

OFFICE OF CONGRESSIONAL ETHICS

COOLIDGE REAGAN FOUNDATION
1629 K Street, N.W. Suite 300
Washington, D.C. 20006

Complainant,

v.

REP. JASMINE CROCKETT
1616 Longworth House Office Building
15 Independence Avenue
Washington, DC 20515, and

Respondents.

VERIFIED COMPLAINT

Introduction

This Complaint alleges Representative Jasmine Crockett attempted to illegally intimidate Republican voters and government officials in violation of the federal Voting Rights Act by publicly calling for and celebrating violence against them. Representative Crockett also illegally and systematically accepted at least several dozen fraudulent contributions through the Act Blue online platform from a retired couple with no income who denies having made them.

PARTIES

1. Complainant COOLIDGE-REAGAN FOUNDATION is a 501(c)(3) nonprofit corporation incorporated in the District of Columbia with its principal place of business in Virginia.

2. Respondent JASMINE CROCKETT serves as a Member of Congress from Texas's 30th Congressional District.

JURISDICTION

3. The Office of Congressional Ethics has jurisdiction over this Complaint pursuant to Rule 1 of the Rules for the Conduct of Investigations (Jan. 23, 2015).

4. This Complaint is brought against Rep. Jasmine Crockett, who is a Member of the U.S. House of Representatives. *See* Rule 1(1).

5. This Complaint arises from conduct that occurred after March 11, 2008. *See* Rule 1(2).

6. This Complaint alleges violations of the House Committee on Standards of Official Conduct's Ethics Manual, U.S. House Code of Official Conduct, and the U.S. Code. All of these provisions were in effect at the time of Rep. Crockett's actions and applied to her in the performance of her official duties. *See* Rule 1(3).

APPLICABLE PROVISIONS ALLEGEDLY VIOLATED

7. The U.S. House of Representatives Ethics Manual states:

a. "Making statements that impugn the reputation of the House" has been deemed to violate Rule 23, clause 1. U.S. House Comm. On Standards of Official Conduct, House Ethics Manual, 110th Cong., 2d Sess., at 13 (2022 ed.) (hereafter, "House Ethics Manual");

b. Members are "prohibited from threatening punitive action" on the basis of a person's "partisan affiliation." *Id.* at 160.

c. Members may not make "threat[s] to agency officials." *Id.* at 313. "A Member should **not** directly or indirectly threaten reprisal . . . to any administrative official." *Id.* at 314. "Care should be taken to avoid any inference of a threat to agency officials." *Id.* at 318.

8. The U.S. House Code of Official Conduct states, "A Member, Delegate, Resident Commissioner, officer, or employee of the House shall behave at all times in a manner that shall

reflect creditably on the House.” Rules of the House of Representatives, 118th Cong., Rule XXIII(1) (Jan. 10, 2023) (hereafter, “Code of Official Conduct” or “Code”). The Code further states, “A Member . . . shall adhere to the spirit and the letter of the Rules of the House.” *Id.* R. XXIII(2).

9. The U.S. Code provides it is a federal crime to:

a. “intimidate, threaten, or coerce, or attempt to intimidate, threaten, or coerce any person for voting or attempting to vote . . .” 52 U.S.C. § 10307(b);

b. “knowingly . . . falsif[y], or make[] a false entry in any record, [or] document . . . with the intent to impede, obstruct, or influence the . . . proper administration of any matter within the jurisdiction of any [federal] department or agency . . .” 18 U.S.C. § 1519; or

c. “in any matter within the jurisdiction of the executive . . . branch of the Government of the United States, knowingly and willfully [to] falsif[y], conceal[], or cover[] up by any trick, scheme, or device, a material fact; [or] make[] any materially false, fictitious or fraudulent statement or representation . . .” 18 U.S.C. § 1001(a)(1)-(a)(2).

**REP. JASMINE CROCKETT IMPUGNED THE HOUSE’S REPUTATION AND
ENGAGED IN ILLEGAL VOTER INTIMIDATION BY TWEETING THREATS OF
VIOLENCE AGAINST REPUBLICAN VOTERS AND OFFICIALS**

10. On or about February 7, 2025, Rep. Crockett declared to a major Internet-based news publication, Axios, that she anticipates “full-on combat” against Elon Musk and the Department of Governmental Efficiency (“DOGE”), because “DOGE is clearly the devil right now.” *See* Andrew Solender, *Democrats Brace for “Full-on Combat” at “Shitshow” DOGE Hearing*, AXIOS (Feb. 7, 2025), <https://www.axios.com/2025/02/07/doge-subcommittee-hearing-greene-crockett-musk>

11. Following up on this violent tirade, on or about February 10, 2025, Rep. Crockett delivered a public speech which was both broadcast over C-SPAN3 and uploaded to YouTube where it remains viewable on numerous websites. A true and complete copy of the video is available at RealClear Politics (Feb. 10, 2025), https://www.realclearpolitics.com/video/2025/02/10/dem_rep_crockett_we_are_going_to_be_on_your_aes_make_sure_you_understand_what_democracy_looks_like.html.

12. During this speech, Rep. Crockett addressed President Donald J. Trump, stating, “Let me tell you something, Mr. Trump. You gonna [sic] learn a few lessons from us.” *Id.* She threatened, “We are gonna be in your face.” *Id.* She screamed, “We are gonna be on your asses, and we are going to make sure. We are going to make sure you know what democracy looks like.” *Id.*

13. Progressives across the country have heeded Rep. Crockett’s call for “full-on combat” by “getting on” Elon’s Musk “ass to teach him a few lessons” by setting fire to Tesla dealerships and vandalizing innocent owners’ Tesla vehicles. *See* Jonathan J. Cooper & Gene Johnson, *Violent Attacks on Tesla Dealerships Spike as Musk Takes Prominent Role in Trump White House*, AP News (Mar. 19, 2025), <https://apnews.com/article/tesla-vandalism-musk-trump-domestic-extremism-7576c03393a733eaf34b793e86ad1a6f>.

14. Dissatisfied with violence against Republican officials, Rep. Crockett circulated on Instagram a cartoon video celebrating her and Rep. Alexandria Occasion Cortez smiling as they physically assault a prone Republican who was pleading with them to stop.

15. @jasmineforus is the Instagram handle for Jasmine Crockett. The bio for this account states, “Congresswoman #TX30 | Civil Rights & Criminal Attorney | Progressive | Former State Rep for HD100 | DST 1913 🐘🔥 | She/Her/Ella | PERSONAL PAGE.”

16. @JasmineForUS is the X.com handle for Jasmine Crockett. The bio for this account likewise states, “Congresswoman #TX30 | Civil Rights & Criminal Attorney | Progressive | Former State Rep for HD100 | DST 1913 🐘🔥 | She/Her/Ella | Personal Account.”

17. Rep. Crockett’s account on Facebook is labeled “JASMINE FOR US” and the URL is <https://www.facebook.com/jasminefor100/>.

18. On or about March 9, 2025, Rep. Crockett circulated online a video from a social media account named coconut_news_network using one of her “jasmineforus” accounts. It appears Rep. Crockett circulated the video through either Facebook Stories or Instagram.

19. The video depicts two smiling hand-drawn cartoon figures. One of them is labeled Jasmine Crockett and the other is labeled AOC (presumably a reference to Rep. Alexandria Ocasio-Cortez).

20. A third figure is lying prone on the ground. It is labeled “Republicans.”

21. The video shows the Crockett and AOC figures smiling as they repeatedly beat and jump on the prone Republican figure as the Republican cries out in pain and begs them to “stop.” The video includes sound effects for the assaults, as well.

22. Rep. Crockett circulated this video containing a cartoon of her enjoying committing physical violence against a helpless Republican voter.

23. A reasonable person viewing this video may reasonably fear Rep. Crockett publicly endorses, is calling for, and/or is willing to engage in physical violence against Republican voters.

24. Crockett has hundreds of thousands of social media followers. Her circulation of the video reached an extremely broad audience.

25. All of the actions alleged herein occurred over the course of 2025.

**REP. JASMINE CROCKETT IMPERMISSIBLY ACCEPTED AND FALSELY
REPORTED FRAUDULENT CAMPAIGN CONTRIBUTIONS FROM AN
UNEMPLOYED SENIOR CITIZEN WHO PUBLICLY DENIED MAKING THEM.**

26. ActBlue is a political committee which accepts and transmits conduit contributions to Democratic candidates, progressive political committees, and other left-wing entities.

27. On information and belief, ActBlue has been laundering hundreds of millions of dollars from foreign sources, wealthy individuals who have already met federal contribution limits, and other illegal sources to progressive Democratic candidates to enable them to attack fundamental American values, undermine the national economy, bankrupt the country, require women to allow men into their intimate changing and bathing areas, and indoctrinate our nation's youth with racist DEI ideology.

28. ActBlue has submitted a series of reports to the Federal Election Commission ("FEC") claiming an individual named Randy Best who lives in Plano, Texas made a total of 2,533 political contributions between January 1, 2023 and December 31, 2024 through the ActBlue online platform totaling \$21,517.37. Each of these disclosures states Mr. Best is "NOT EMPLOYED."

29. On information and belief, Mr. Best is an unemployed 73-year-old retiree.

30. According to ActBlue's reports, between May 26 and November 4, 2024, Mr. Best is reported as allegedly contributing a total of \$610 through ActBlue to Jasmine Crockett over a series of 56 separate transactions throughout that period.

31. Plano, where Mr. Best resides, is not located within Texas' 30th Congressional District.

32. A spreadsheet containing data downloaded from the FEC website summarizing all of the reports ActBlue submitted to the FEC concerning each conduit contribution it claims to have received from Mr. Best is attached in relevant part as Exhibit 1.

33. Jasmine Crockett submitted a series of reports throughout the FEC over approximately the same time period claiming she received a total of \$595 from Mr. Best through 53 separate transactions.

34. A spreadsheet containing data downloaded from the FEC website summarizing all of the reports Jasmine for US submitted to the FEC on behalf of Rep. Crockett concerning each contribution it claims to have received through ActBlue from Mr. Best is attached in relevant part as Exhibit 2.

35. Attorney Sholdon Daniels, who wishes to run against Rep. Crockett for Congress, posted an online video of him visiting the Best residence in Plano, Texas, apparently at the address reported on Rep. Crockett's FEC filings. A true and complete copy of the four-minute video is available on x.com at: <https://x.com/SholdonDaniels/status/1899651558817575239>. The video contains a recording of Mr. Daniels speaking with an elderly woman at that address claiming to be Mr. Best's wife. She said that they are retired, and was completely unaware that over \$21,000 in political contributions had been made—or were reported as having been made—in her husband's name.

36. The money provided through ActBlue in the name of Mr. Best appear to be fraudulent transactions, with the identity of the true contributor concealed by both ActBlue and Rep. Crockett.

37. Rep. Crockett has received thousands of other donations through ActBlue totaling over \$870,000. It is unclear how many of these are similarly fraudulent transactions, made in the name of unsuspecting innocent people who did not actually provide the funds.

38. All of the actions alleged herein occurred over the course of 2024 and 2025.

VIOLATIONS

COUNT I

Engaging in Behavior that does not Reflect Credibly on the House U.S. House Code of Official Conduct Rule XXIII

39. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

40. The U.S. House Code of Official Conduct states, “A Member, Delegate, Resident Commissioner, officer, or employee of the House shall behave at all times in a manner that shall reflect creditably on the House.” Code of Official Conduct Rule XXIII(1). Moreover, a Member must “adhere” to both “the spirit and the letter of the Rules of the House.” *Id.* R. XXIII(2).

41. The U.S. House of Representatives Ethics Manual explains his rule prohibits Members from “[m]aking statements that impugn the reputation of the House.” House Ethics Manual at 13.

42. Members are likewise “prohibited from threatening punitive action” on the basis of a person’s partisan affiliation.” *Id.* at 160. They are similarly enjoined from threatening officials of federal agencies. *Id.* at 313, 314, 318.

43. Rep. Crockett engaged in behavior that does not reflect credibly on the House and threatened punitive action on the basis of voters’ partisan affiliation by circulating a sick video depicting animated likeness of her and Rep. Ocasio-Cortez beating a prone Republican voter as he moaned in pain and pled with them to stop.

44. Rep. Crockett engaged in behavior that does not reflect credibly on the House and threatened federal agency officials by calling for “full-on combat” against Elon Musk, on the grounds that he is “clearly the devil.”

45. Rep. Crockett engaged in behavior that does not reflect credibly on the House and threatened President Trump by saying he would “learn a few lessons” from her because she would be “in [h]s face” and “on [his] ass.”

46. Rep. Crockett at the very least violated the “spirit” of the House rules by disseminating these vile videos and messages.

WHEREFORE, Respondent Rep. Jasmine Crockett violated the U.S. House Code of Official Conduct by engaging in behavior that does not reflect credibly on the House.

COUNT II
Voter Intimidation
in Violation of 52 U.S.C. § 10307(b)

47. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

48. The U.S. Code makes it a federal crime to “intimidate, threaten, or coerce, or attempt to intimidate, threaten, or coerce any person for voting or attempting to vote” 52 U.S.C. § 10307(b).

49. Rep. Crockett circulated a disturbing video to her hundreds of thousands of social media followers depicting avatars of her and Rep. Ocasio-Cortez smiling as they physically assault a prone Republican as he moans in pain and pleads with them to stop.

50. A reasonable person viewing this video may reasonably fear Rep. Crockett publicly endorses, is calling for, and/or is willing to engage in physical violence against Republican voters, and may thereby reasonably be deterred from continuing to remain a registered Republican, voting

for Republican candidates, or publicly supporting the Republican party due to these threats of physical assault, if not by Rep. Crockett personally, then by any of the hundreds of thousands of supporters to whom she has disseminated this video.

WHEREFORE, Respondent Rep. Jasmine Crockett violated 52 U.S.C. § 10307(b).

COUNT III
False Statements in Violation of 18 U.S.C. § 1001(a)(2)

51. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

52. The U.S. Criminal Code provides it is a federal crime for any person “in any matter within the jurisdiction of the . . . legislative . . . branch of the Government of the United States, knowingly and willfully . . . [to] make[] any materially false, fictitious, or fraudulent statement or representation.” 18 U.S.C. § 1001(a)(2).

53. Rep. Crockett filed disclosure reports with the FEC over the course of 2024 falsely claiming Mr. Randy Best of Plano, Texas, was the source of fifty-three (53) separate contributions she received through the ActBlue platform in 2024.

54. Mr. Best is an unemployed 73-year-old retiree who lives outside of Rep. Crockett’s district; his wife has publicly denied any knowledge of any such contributions ever being made. On information and belief, under the totality of the circumstances, it is at least extremely unlikely on its face Mr. Best is the source of either these contributions to Rep. Crockett or the other thousands of contributions made in his name through the ActBlue platform.

55. Rep. Crockett’s material misrepresentations helped to conceal the true source of the funds she received through ActBlue, shielding it from public and congressional scrutiny.

WHEREFORE, Respondent Rep. Jasmine Crockett violated 18 U.S.C. § 1001(a)(2).

COUNT IV
False Statements in Violation of 18 U.S.C. § 1519

56. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

57. The U.S. Criminal Code provides it is a federal crime for any person to “knowingly . . . falsif[y], or make[] a false entry in any record, [or] document . . . with the intent to impede, obstruct, or influence the . . . proper administration of any matter within the jurisdiction of any [federal] department or agency . . .” 18 U.S.C. § 1519;

58. The filing of a campaign finance report constitutes a matter within the FEC’s jurisdiction for purposes of this provision. *United States v. Benton*, 890 F.3d 697, 811 (8th Cir. 2018).

59. Rep. Crockett filed disclosure reports with the FEC over the course of 2024 falsely claiming Mr. Randy Best of Plano, Texas, was the source of fifty-three (53) separate contributions she received through the ActBlue platform in 2024.

60. Mr. Best is an unemployed 73-year-old retiree who lives outside of Rep. Crockett’s district; his wife has publicly denied any knowledge of any such contributions ever being made. On information and belief, under the totality of the circumstances, it is extremely unlikely Mr. Best is the source of either these contributions to Rep. Crockett or the other thousands of contributions made in his name through the ActBlue platform.

61. Rep. Crockett’s material misrepresentations helped to conceal the true source of the funds she received through ActBlue, shielding it from public and congressional scrutiny.

WHEREFORE, Respondent Rep. Jasmine Crockett violated 18 U.S.C. § 1519.

CONCLUSION

For these reasons, this Office should investigate this Complaint, authorize preliminary and second-phase reviews, and refer this matter to the U.S. House Committee on Ethics, the House Office of Inspector General, and the U.S. Department of Justice.

VERIFICATION

I declare under penalty of perjury the foregoing is true and correct to the best of my personal knowledge. 18 U.S.C. § 1001 applies to the information I am providing.

I further affirm that to the best of my knowledge and ability all evidence submitted was not obtained in violation of any law, rule, or regulation.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Dan Backer", is written over a horizontal line.

Dan Backer, Esq.
Counsel for Complainant
Coolidge Reagan Foundation

Dated March 25, 2025