

FEDERAL ELECTION COMMISSION

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,

JASMINE FOR US
P.O. Box 227235
Dallas, TX 75222, and

ACTBLUE
P.O. Box 441146
Somerville, MA 02144,

Respondents.

VERIFIED COMPLAINT

Democratic Congresswoman Jasmine Crockett appears to have violated federal campaign finance law by accepting and inaccurately reporting a series of contributions processed through the ActBlue platform throughout late 2024. Rep. Crockett reported receiving over fifty contributions from Mr. Randy Best of Plano, Texas, an unemployed 73-year-old retiree who does not reside in her congressional district. The totality of the circumstances, including the public statements of his wife, presents reason to believe Mr. Best did not actually make any of those contributions. Nor does it appear he made any of the 2,533 contributions made in his name through ActBlue between January 1, 2023, and December 31, 2024. Rather, the evidence suggests ActBlue has been providing thousands of dollars of contributions to Democratic candidates in the names of

unsuspecting elderly people in order to allow recipients such as Rep. Crockett to shield the true source of the funds and potentially accept excessive or otherwise illegal contributions. The Federal Election Commission (“FEC”), on the basis of this clear evidence, should open an investigation into both Rep. Crockett and ActBlue’s larger scheme, which has been persuasively linked to money laundering for hundreds of millions of dollars to Democratic candidates.¹

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.

3. Respondent JASMINE FOR US, FEC ID #C00795450, is the principal authorized campaign committee for Rep. Jasmine Crockett. It registered with the FEC on November 23, 2021. Its treasurer is Sue Jackson.

4. Respondent ACTBLUE is a nonqualified unauthorized hybrid political committee, FEC #1806806. Its treasurer is George Gilmer.

¹ See Andrew Miller & Elizabeth Elkind, *GOP Lawmaker Calls for FBI Investigation Into “Alarming” Allegations Against Top Dem Fundraising Platform*, Yahoo! News (Mar. 13, 2025) (“Rep. Andy Biggs, R-Ariz., has sent a letter to the Federal Bureau of Investigation (FBI) calling for an investigation into ActBlue, the main fundraising platform for the Democratic Party, over concerns the platform had ‘been used to skirt the integrity of federal campaign finance laws.’”), <https://www.yahoo.com/news/gop-lawmaker-calls-fbi-investigation-185758987.html>; see also Press Release, *Chairman Steil Releases Findings from Subpoena of ActBlue* (Dec. 10, 2024) (“On October 30, 2024, Chairman Steil issued a subpoena to ActBlue for documents related to ActBlue’s donor verification policies and the potential for foreign actors to use the platform to launder illicit money into U.S. political campaigns.”), <https://republicans-cha.house.gov/2024/12/chairman-steil-releases-findings-from-subpoena-of-actblue>; cf. Josh Christenson & Emily Crane, *Dem Fundraiser ActBlue Facing Possible Terror-Financing Investigation Amid Fraud Probe*, N.Y. Post (Mar. 12, 2025), <https://nypost.com/2025/03/12/us-news/dem-fundraiser-actblue-facing-possible-terror-financing-investigation-amid-fraud-probe/>.

**REP. CROCKETT HAS ACCEPTED THOUSANDS OF CONTRIBUTIONS
THROUGH AN ONLINE PLATFORM UNDER PERVASIVE INVESTIGATION
FOR FACILITATING ILLEGAL FINANCIAL TRANSACTIONS**

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

6. 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.

7. ActBlue has been the subject of hundreds of "suspicious activity reports" banks across the country have submitted to the U.S. Treasury Department. *See* Miller & Elkind, *supra* ("In 2024, President Biden's Treasury Department found hundreds of suspicious transactions with ActBlue reported by banks . . .").

8. "[N]ineteen state attorneys general across the country have made inquiries into ActBlue over a variety of allegations, including fraud, money laundering, fraudulent and counterfeit use of credit and debit cards, and patterns of contributions that are suspicious." *Id.*

9. ActBlue is "the subject of several state-level investigations stemming from allegedly fraudulent contributions made via the platform without the reported contributors' awareness — serious allegations that, if proven true, would violate federal law." *Id.*

10. "Democratic fundraising platform ActBlue may have raked in millions through fraudulent donations, according to the testimonies of elderly Americans who said federal election

records do not reflect their giving.” Elizabeth Troutman Mitchell, *Where Does the Money Come From? Elderly Democrats Say Donations Made in Their Names Aren’t Genuine*, Daily Signal (Jan. 8, 2025), <https://www.dailysignal.com/2025/01/08/elderly-democrats-say-thousands-donations-actblue-were-made-fraudulently-their-names/>.

- a. “An 88-year-old retired Yale University professor, for example, supposedly made 7,539 donations for a total of \$213,163, according to FEC records. After [former Connecticut candidate] Dominic Rapini informed him about the significant donations in his name, he signed an affidavit saying, ‘I believe this does not reflect my donation frequency or dollars I have donated.’” *Id.*
- b. “An elderly acupuncturist and registered Democrat appears to have made 17 donations in 2022 through ActBlue totaling \$317. In an email to Rapini, she promised she hasn’t made political contributions since 2016.” *Id.*
- c. “A 91-year-old woman appears to have made 2,591 donations totaling \$41,000, according to FEC filings. She signed an affidavit with Rapini denying making the reported donations.” *Id.*
- d. “Another 75-year-old woman looks to have made 4,270 small donations adding up to \$32,323. She too signed an affidavit with Rapini denying making the donations in this frequency or quantity.” *Id.*

**REP. CROCKETT’S ACCEPTANCE AND FALSE REPORTING
OF SCORES OF CONTRIBUTIONS THROUGH ACTBLUE
APPARENTLY MADE IN THE NAME OF ANOTHER PERSON**

11. ActBlue has submitted a series of reports to the FEC claiming an individual named Randy Best, who lives outside the Texas 30th Congressional District 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.”

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

13. 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.

14. 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.

15. Jasmine Crockett, through her principal campaign committee Respondent Jasmine for US, 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.

16. 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.

17. 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 they are retired, and was completely unaware that over \$16,000 in political contributions had been made—or were reported as having been made—in her husband's name.

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

19. Rep. Crockett, through her principal campaign committee Respondent Jasmine for US, 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.

ALLEGED VIOLATIONS

COUNT I

Failure to Accurately Report the Identity of a Contributor in Violation of 52 U.S.C. § 30104(b)(3)(A)

20. Complainant re-alleges the foregoing allegations as if set forth fully herein.

21. The Federal Election Campaign Act ("FECA") provides, "Each report under this section shall disclose . . . the identification of each person (other than a political committee) who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of \$200 within the calendar year" 52 U.S.C. § 30104(b)(3)(A).

22. Over the course of 2024, both ActBlue and Jasmine for US, the principal authorized candidate committee of Rep. Crockett, reported receiving dozens of contributions which they reported as originating with Mr. Randy Best of Plano, Texas.

23. Under the totality of the circumstances, substantial reason to believe exists none of those contributions actually originated with Mr. Best. Accordingly, both ActBlue's and Rep. Crockett's reports contained false information and did not accurately contain the identification of the source of funds in excess of \$200 in calendar year 2024.

WHEREFORE, reason to believe exists Respondents Rep. Crockett, Jasmine for US, and ActBlue violated 52 U.S.C. § 30104(b)(3)(A).

COUNT II
Accepting Contributions in the Name of Another
in Violation of 52 U.S.C. § 30122

24. Complainant re-alleges the foregoing allegations as if set forth fully herein.

25. The Federal Election Campaign Act ("FECA") provides, "[N]o person shall knowingly accept a contribution made by one person in the name of another person." 52 U.S.C. § 30122.

26. Respondents ActBlue and Jasmine for US claim to have accepted scores of contributions from Mr. Randy Best of Plano, Texas, when the totality of the circumstances provides reason to believe the funds actually originated from a different source.

WHEREFORE, reason to believe exists Respondents Rep. Crockett, Jasmine for US, and ActBlue violated 52 U.S.C. § 30104(b)(3)(A).

CONCLUSION

For these reasons, Complainant Coolidge-Reagan Foundation respectfully requests the Federal Election Commission commence enforcement proceedings against Respondents Rep. Jasmine Crockett, Jasmine for US, and ActBlue.

Respectfully submitted this 26th day of March, 2025.



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