



# FACT

FOUNDATION FOR  
ACCOUNTABILITY  
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## FACT Releases Top Ethics Violators of 2024

Washington, D.C. --- December 21, 2024 --- The non-partisan ethics watchdog group, the Foundation for Accountability and Civic Trust (FACT), today released its “**Top Ethics Violators of 2024**”.

At the close of each year FACT releases a “Top Violators” list from the past year. This year’s top violators revolved around those in or seeking public office in the 2024 election. One would hope that those seeking state or federal roles of public leadership in America would hold the highest level of ethics and integrity, especially during an election year. This year’s top ethics complaints show that this is not always the case.

Unethical leadership is the exact opposite behavior Americans want to see from a public official. It is important to note the alarming detail that there is not one particular ethics rule implicated amongst them, rather they cover a wide variety of fronts, including the laws enforced by of the Office of Special Counsel, the Federal Election Commission, and the Office of Congressional Ethics. It’s clear these top violators too often prioritize themselves over serving their constituents.

FACT’s top ethics violators of 2024 included:

- [Department of Health and Human Services Secretary Xavier Becerra](#): In October, FACT requested the Office of Special Counsel investigate whether Secretary Becerra and other federal employees violated the Hatch Act by sending a blatant political email to Medicare recipients. In September 2024, just two months before the presidential election, HHS sent an unsolicited political email which has been accurately described as a “sales pitch for Kamala Harris.” The email touted the Vice President’s alleged role in the Inflation Reduction Act, “lowering health care costs”, and “save[ing] money for American taxpayers.” The official email from HHS was sent to those who signed up simply to receive updates on the government’s Medicare program, which is a total possible universe of 67.5 million recipients. This type of political advocacy from the government targeting citizens who interact with an agency is exactly the type of politicization the Hatch Act is designed to prevent.
- [U.S. Representative-elect Eugene Vindman of Virginia](#): In August, FACT requested the Federal Election Commission investigate whether Eugene Vindman and his Virginia House campaign unlawfully solicited and accepted multiple contributions from the VoteVets PAC in violation of the contribution limits under the Federal Election Campaign Act. During his campaign, a media outlet contacted Vindman’s office for comment on his military experience. Vindman’s campaign manager pointed the media outlet to the political

director of VoteVets PAC and stated that all media requests could be directed to him. VoteVets, a “hybrid PAC”, endorsed Vindman, made \$10,000 in direct campaign contributions to him during the election cycle, and spent more than \$400,000 on advertisements supporting the candidacy of his successful congressional run. VoteVets, in handling Vindman’s campaign communications, appears to have significantly exceeded federal law’s contribution limits.

- [U.S. Representative Gwen Moore of Wisconsin](#): In July, FACT filed a complaint requesting the Federal Election Commission investigate and take appropriate action on Rep. Moore for abusing her leadership PAC to the point that its activities demonstrate it to be a “scam PAC”. Rep. Moore’s leadership PAC, named GWEN PAC, was established to support candidates for public office and is legally required to do so. In the 2024 election cycle GWEN PAC made only \$14,500 in 12 contributions to political committees or organizations--just 5% of its overall spending. Thus, 94.8% of GWEN PAC’s spending went toward things other than the law’s required purpose of supporting candidates or causes. GWEN PAC spent almost eight times more on food and travel than it did on its required purpose of supporting candidates. Some examples of their spending were on alcohol, catering, food delivery, restaurants, hotels, and a resort in California’s wine country. GWEN PAC’s spending proves that instead of being the leadership PAC it claims to be, the organization is operating as a scam PAC, or a PAC that raises funds under the guise of supporting candidates when in fact the majority of their spending goes to “operating costs”. Federal candidates may not operate a scam PAC according to the Federal Election Campaign Act (FECA).
- [Senator Sherrod Brown of Ohio](#): In May, FACT urged the Federal Election Commission to investigate whether Sen. Sherrod Brown of Ohio and his campaign knowingly solicited excessive contributions for his 2024 Ohio Senate campaign. Sen. Brown’s campaign committee reported no outstanding debts in connection with his uncontested primary on March 19. After this, however, Sen. Brown continued to actively solicit contributions for this past primary election through a joint fundraising committee—a clear violation of federal law. Separately, Sen. Brown’s solicitation of funds specifically designated that contributions of up to \$10,000 made to the Ohio Democratic Party would be spent on his U.S. Senate general reelection campaign, namely to fund “voter turnout operation to get Sherrod across the finish line this November.” This qualifies the contribution as an earmark and thus legally should have been deemed contributions to Sen. Brown. The solicitations in both instances above--the past primary election with no debt and the general election--appear to be in excess of the federal legal limits.
- [Representative Alexandria Ocasio-Cortez of New York](#): In April, FACT filed a complaint requesting the Office of Congressional Ethics investigate Rep. Ocasio-Cortez for using official resources for political purposes, including official House floor and committee video, in violation of federal law and House ethics rules. House ethics rules clearly state that Members are forbidden from using official resources for any campaign or political activity, which she did on multiple occasions.
- [The American Mainstream Policy Leadership Institute \(AMPLI\) and federal candidates who have accepted funds from their organization](#): In March, FACT filed a complaint requesting the Federal Election Commission investigate and take appropriate action to

address apparent violations of AMPLI and the federal candidates who have accepted funds from their organization. AMPLI made payments to candidates for federal office under the guise of a “fellowship” program. However, the founder of the fellowship explained in a public interview that their purpose is to pay the personal expenses of candidates who have lost elections and are highly likely to run again in the near future, and not for actual work product. The founder of the fellowship explained, “they get a stipend, so they don’t have to like worry about paying their rent or their groceries or their mortgage, right, and also they get four months to rethink and reflect and work on and do research on things that they find would be valuable for them as political leadership development.” AMPLI would not have given the fellowship funds to someone that they did not anticipate running for an office in the near future. It’s quite clear that the purpose of this program is not to pay failed candidates for bona fide services, but rather to illegally give money to candidates before they file again to run for another office. This activity, namely paying candidates for reasons directly related to their candidacy, is most certainly not allowed by federal law.

### **FACT’s Dishonorable Mentions of 2024**

- [Former Congressman and 2024 congressional candidate Mondaire Jones of New York](#): In October, FACT filed a complaint requesting the Office of Congressional Ethics investigate Jones to determine whether he violated federal law and House ethics rules by failing to disclose sources of income and positions held in his 2024 financial disclosure filing. Former Rep. Jones established his candidacy on July 5, 2023, after which he was required to file a financial disclosure report within 30 days and another closer to the election in May 2024. He did file the two required reports, but based upon information he provided in his 2023 filing, Jones did not include his relationship with CNN, Future Forward USA Action, Demand Justice, and The Nation in his 2024 report. Jones’s failure to disclose this information on his 2024 filing leaves the organizations’ names totally absent from the report. Notably much of the omitted information was related to political organizations that held positions with which voters may disagree.
- [U.S. Representative David Trone of Maryland](#): In June, FACT filed a complaint requesting the Office of Congressional Ethics investigate Congressman Trone to determine whether he violated federal law and House ethics rules by failing to disclose financial information about his ownership in "Total Wine." The company is one of the largest liquor retail chains in the U.S., with a reported \$5.5 billion in revenue in 2022. Congressman Trone’s financial disclosure filings appear to show substantial underreporting of assets by failing to disclose his interest in numerous Total Wine franchises.