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One Hundred Eighteenth
Congress of the United States
House of Representatives

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October 30, 2024

Ms. Regina Wallace-Jones
Chief Executive Officer
ActBlue
P.O. Box 441146
Somerville, MA 02144

Dear Ms. Wallace-Jones:

As you may be aware, the Committee on House Administration of the U.S. House of Representatives (“Committee”) has broad legislative and oversight jurisdiction over federal elections, including federal campaign finance laws.¹ Pursuant to its Constitutional oversight responsibilities regarding the integrity and fairness of federal elections, the Committee is compelling, via the attached subpoena, the production of documents and communications related to ActBlue’s donor verification policies and the potential for foreign actors, primarily from Iran, Russia, Venezuela, and China, to use ActBlue to launder illicit money into U.S. political campaigns.

Per the Committee’s October 28, 2024, letter detailing the Committee’s investigative efforts, the Committee has concerns that foreign actors may be exploiting existing U.S. donors by making straw donations without the knowledge of either those individuals or your platform.²

On October 31, 2023, the Committee inquired about how ActBlue prevents contributions from foreign sources, and whether it requires the card verification value (“CVV”) associated with the credit or debit card used by the contributor when making an online contribution.³ In response, you explained that at the time your platform did not require contributors to provide a CVV when making an online contribution in all transactions.⁴ This failure to verify donor identity may have allowed foreign actors to fraudulently participate in the political process in the United States.

¹ Rules of the United States House of Representatives, Rule X(k)(12), <https://rules.house.gov/sites/republicans.rules118.house.gov/files/documents/Rules%20and%20Resources/118-House-Rules-Clerk.pdf>.

² Comm. on H. Admin, 118th Cong., Letter to ActBlue (Oct. 28, 2024), <https://cha.house.gov/cache/files/c/3/c331cd52-b2aa-4016-83ad-8c63a1acd916/E5D8C3D2B5DC920314CF97242C7F7A0E.final-letter-to-actblue---oct-2024.pdf>.

³ Comm. on H. Admin., 118th Cong., Letter to ActBlue (Oct. 31, 2023), <4922D896A967959D5BC6530F6615E9B9.actblue-letter-final-78-.pdf> (house.gov).

⁴ Regina Wallace-Jones, CEO of ActBlue, Letter to the Comm. on H. Admin., 118th Cong., (Nov. 27, 2023), <FEE0032E48BFF011537DA5927F7E9298.response-to-house-admin-committee-11-27-23.pdf>.

However, according to the Office of the Texas Attorney General, it appears ActBlue may have recently changed this policy.⁵

To strengthen donor verification requirements, I introduced,⁶ and the Committee unanimously reported out, H.R. 9488,⁷ the Secure Handling of Internet Electronic Donations Act⁸ (“SHIELD Act”), which would prohibit political committees from accepting online contributions from debit or credit cards without the disclosure of the card verification value (“CVV”) and billing address associated with the card. The legislation would also prohibit the acceptance of contributions from pre-paid gift cards and adopt a bipartisan recommendation from the Federal Election Commission to prohibit individuals from knowingly aiding or abetting someone who makes a contribution in the name of another person.⁹

As the Committee continues to develop legislation to close loopholes in our campaign finance system and prevent foreign actors from influencing U.S. federal elections, we are issuing this subpoena to better inform our efforts to safeguard our nation’s elections.

Per the attached subpoena and its instructions, please comply by November 6, 2024. Please contact T. March Bell, General Counsel of the Committee on House Administration, at March.Bell@mail.house.gov, if you have any questions.

Sincerely,



Bryan Steil
Chairman
Committee on House Administration

⁵ Attorney General Ken Paxton’s Ongoing Investigation Into Act-Blue Yields Cooperation On Donor Credit Card Identification, Ken Paxton, Attorney General of Texas (Aug. 8, 2024), <https://www.texasattorneygeneral.gov/news/releases/attorney-general-ken-paxtons-ongoing-investigation-actblue-yields-cooperation-donor-credit-card#:~:text=%E2%80%9CActBlue%20has%20cooperated%20with%20our%20ongoing%20investigation.%20The%20help%20prevent%20fraudulent%20donations%2C%E2%80%9D%20said%20Attorney%20General%20Paxton.>

⁶ Comm. on H. Admin., Chairman Steil Introduces Legislation to Strengthen Campaign Finance Laws, 118th Cong. (Sep. 9, 2024), <https://cha.house.gov/press-releases?ID=3FE0757A-2973-48E5-A221-88AFD8F5B8B7>.

⁷ Comm. on H. Admin., Nonpartisan Measures Pass Out of House Administration Markup by Voice Vote, 118th Cong. (Sep. 20, 2024), <https://republicans-cha.house.gov/2024/9/nonpartisan-measures-pass-out-of-house-administration-markup-by-voice-vote>.

⁸ Secure Handling of Internet Electronic Donations Act, H.R. 9488, 118th Cong. § 2 (2024).

⁹ Legislative Recommendations of the Federal Election Commission 2023 (Dec. 14, 2023), <https://www.fec.gov/resources/cms-content/documents/legrec2023.pdf>. See also *FEC v. Swallow*, 304 F. Supp. 3d 1113, 1116 (D. Utah 2018) (invalidating the FEC’s longstanding regulation prohibiting this conduct).