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One Hundred Eighteenth
Congress of the United States
House of Representatives

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October 28, 2024

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

Dear Ms. Wallace-Jones:

As Chairman of the U.S. House of Representatives Committee on House Administration (“Committee”), which has broad jurisdiction over federal campaign finance law, I write today to demand information on 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. Our investigation has indicated that these actors may be exploiting existing U.S. donors by making straw donations without the individuals’ or your platform’s knowledge.

On October 31, 2023, the Committee sent you a letter inquiring 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.¹ In response, you explained that your platform did not require contributors to provide their CVV when making an online contribution in all transactions.² This failure to verify donor identity may have allowed foreign actors to fraudulently participate in the political process in the U.S.

Following this concerning information, the Committee sent a letter to the Federal Election Commission (“FEC”) requesting the FEC immediately initiate an emergency rulemaking process to require political campaigns to verify the CVV of donors who contribute online and a rulemaking to prohibit political committees from accepting online contributions from gift card

¹ Comm. on H. Admin., 118th Cong., Letter to ActBlue (Oct. 31, 2023), [4922D896A967959D5BC6530F6615E9B9.actblue-letter-final-78-.pdf \(house.gov\)](https://www.house.gov/committees/admin/4922D896A967959D5BC6530F6615E9B9.actblue-letter-final-78-.pdf).

² Regina Wallace-Jones, CEO of ActBlue, Letter to the Comm. on H. Admin., 118th Cong., (Nov. 27, 2023), [EEE0032E48BFF011537DA5927F7E9298.response-to-house-admin-committee-11-27-23.pdf](https://www.house.gov/committees/admin/EEE0032E48BFF011537DA5927F7E9298.response-to-house-admin-committee-11-27-23.pdf).

or credit and debit cards.^{3,4} I also introduced,⁵ and the Committee passed H.R. 9488,⁶ the Secure Handling of Internet Electronic Donations Act (“SHIELD Act”), that would prohibit political committees from accepting online contributions from debit or credit cards without the disclosure of the CVV and billing address associated with the card. The legislation would prohibit the acceptance of contributions from pre-paid gift cards. The bill would also adopt a bipartisan legislative recommendation from the FEC to prohibit individuals from knowingly aiding or abetting someone that makes a contribution in the name of another person.⁷

Further, the Committee conducted a comprehensive data analysis, comparing over 200 million FEC donation records with data on age, party affiliation, number of donations, consumer purchasing power, and net worth. This study revealed several anomalies and mismatches in the FEC records, suggesting that foreign entities may be using these tactics to interfere with U.S. elections.

In light of the pressing need to protect the integrity of our upcoming federal elections, the Committee has moved swiftly in its investigations and recently referred this matter to several state Attorneys General for further investigation, including those in Arkansas, Florida, Missouri, Texas, and Virginia.⁸ Additionally, we have continued to consult with experts in money laundering, terrorism finance, and credit card processing to better understand how these foreign actors may be exploiting our political donation systems.⁹

As the Committee continues to develop legislation to close off loopholes in our campaign finance system and prevent foreign actors from influencing U.S. federal elections, we demand the following information from ActBlue:

1. All documents and memoranda regarding changes to ActBlue’s CVV verification policy since October 1, 2023.

³ Comm. on H. Admin., 118th Cong., Letter to the FEC (Aug. 5, 2024),

[AD4186C84F88B81763B784FFFAAA5938.fec-rulemaking-request-letter.pdf](https://www.house.gov/committees/admininst/ce/AD4186C84F88B81763B784FFFAAA5938.fec-rulemaking-request-letter.pdf) (house.gov).

⁴ Attorney General of Texas, Ken Paxton, ran a parallel investigation and recently asked the FEC to initiate in a similar rulemaking. *See* Investigation Into ActBlue By Attorney General Ken Paxton Uncovers Large Number of Suspicious Donations Made Through Obscured Identities and Untraceable Means; OAG Demands FEC Action, Ken Paxton, Attorney General of Texas (Oct. 21, 2024),

<https://www.texasattorneygeneral.gov/news/releases/investigation-actblue-attorney-general-ken-paxton-uncovers-large-number-suspicious-donations-made>.

⁵ 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>.

⁶ 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>.

⁷ Legislative Recommendations of the Federal Election Commission 2023 (Dec. 14, 2023),

<https://www.fec.gov/resources/cms-content/documents/legrec2023.pdf>

⁸ Comm. on H. Admin., Chairman Steil Announces Referrals to Attorneys General in ActBlue Investigation, 118th Cong. (Sep. 19, 2024), <https://cha.house.gov/press-releases?ID=D3B2B5D7-5603-40D6-9DDE-5148A331B76D>.

⁹ The Committee has a briefing scheduled with the Financial Crimes Enforcement Network on October 30, 2024, to discuss how the Treasury Department is combatting potential illicit election funding. *See* Comm. on H. Admin., Chairman Steil Probes FinCEN on Potential for Illicit Campaign Finance Activity in U.S., 118th Cong. (Aug. 16, 2024), <https://cha.house.gov/press-releases?ID=04D2D580-EEB3-412F-9CC6-313DF083E38A>.

2. All documents relating to contributions ActBlue has processed via prepaid cards, since October 1, 2023, including a breakdown of any contributions from cards originating outside the United States and including any gift card or prepaid card payments processed through third-party payment processors.
3. All documents, since October 1, 2023, on any entities that ActBlue has deplatformed due to a decision “not to process” by any third-party payment processors.
4. All documents and memoranda, since October 1, 2023, that pertain to deplatforming any entities where the source of funding came from a foreign or sanctioned source.
5. All documents, since October 1, 2023, that pertain to any reports received from U.S. citizens alleging unauthorized or fraudulent donations made in their names.

The Committee is in the process of subpoenaing the items listed above. Given the critical importance of safeguarding the upcoming election, we strongly urge you to expedite the response to this inquiry. Immediate cooperation on this matter is essential to protect the integrity of our electoral system and to mitigate any risks posed by foreign actors attempting to interfere with the U.S. political process. Thank you for your prompt attention to this urgent national security matter.

To arrange for the delivery of responsive documents, please contact Majority staff at the Committee on House Administration at 202-225-8281.

Sincerely,



Bryan Steil
Chairman
Committee on House Administration