



**FRAUD ON ACTBLUE, PART II: ILLICIT FOREIGN DONATIONS AND A COVER-UP
SPUR MASS RESIGNATIONS AND FIRINGS ON ACTBLUE'S LEGAL AND
COMPLIANCE TEAM**

Interim Staff Report of the

Committee on House Administration,
Committee on the Judiciary, and
Committee on Oversight and Government Reform

U.S. House of Representatives



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EXECUTIVE SUMMARY

The Committee on House Administration, the Committee on the Judiciary, and the Committee on Oversight and Government Reform are charged with ensuring the integrity of American elections.¹ To that end, the Committees are examining allegations that ActBlue, a leading political fundraising organization, allowed bad actors, including foreign actors, to exploit its online platform to make fraudulent political donations.²

On April 2, 2025, the Committees published a staff report detailing initial findings from our investigation into ActBlue’s fraud-prevention practices.³ Internal documents produced to the Committees by ActBlue and its fraud-prevention contractor, Sift, “reflect a fundamentally unserious approach to fraud prevention at ActBlue—one that has left the door open for large-scale fraud campaigns on Democrats’ top fundraising platform.”⁴ The Committees’ oversight has found that ActBlue, in its own words, decided to take “a more lenient approach” to fraud prevention in 2024, weakening its fraud-prevention policies at least twice even though internal assessments showed that these changes would result in a measurable increase in fraudulent contributions.⁵ Similarly, internal trainings directed ActBlue’s fraud-prevention team to “look for reasons to accept contributions” rather than examine them closely for indicators of fraud—as required by federal regulation.⁶ ActBlue took this lax approach to fraud prevention even though it has detected at least 22 significant fraud campaigns on the platform in recent years, including several from foreign sources.⁷

After the Committees’ investigation began, the *New York Times* reported that at least seven senior staff members, including ActBlue’s “highest-ranking legal officer,” resigned from or were fired by the platform in early 2025.⁸ The *Times* also reported that the last remaining lawyer on ActBlue’s legal team, Zain Ahmad, went “on leave” and had his access to internal systems revoked in late February 2025.⁹ Ahmad reportedly claimed that he had been retaliated against by ActBlue staff for blowing the whistle on internal misconduct.¹⁰ On April 2, 2025, the Committees requested documents and communications from ActBlue related to this staff turmoil and alleged retaliation.¹¹ After ActBlue suspended its voluntary cooperation with the

¹ Rules of the House of Representatives R. X (K) Committee on House Administration, (L) Committee on the Judiciary, (N) Committee on Oversight and Government Reform (2025).

² See STAFF OF THE COMM. ON H. ADMIN., H. COMM. ON THE JUDICIARY, & H. COMM. ON OVERSIGHT AND GOV’T REFORM, 119TH CONG., FRAUD ON ACTBLUE: HOW THE DEMOCRATS’ TOP FUNDRAISING PLATFORM OPENS THE DOOR FOR ILLEGAL ELECTION CONTRIBUTIONS (Comm. Print Apr. 2, 2025) (hereinafter “ActBlue Staff Report I”).

³ *Id.*

⁴ *Id.* at 1.

⁵ *Id.* at 6-9.

⁶ *Id.* at 10-14; see Deposit of receipts and disbursements, 11 C.F.R. § 103.3(b) (2024).

⁷ ActBlue Staff Report I, *supra* note 2, at 14-17.

⁸ Reid J. Epstein & Shane Goldmacher, *ActBlue, the Democratic Fund-Raising Powerhouse, Faces Internal Chaos*, N.Y. TIMES (Mar. 5, 2025).

⁹ *Id.*

¹⁰ *Id.*

¹¹ Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Ms. Regina Wallace-Jones, CEO, ActBlue (Apr. 2, 2025).

Committees’ oversight in June 2025,¹² the Committees issued subpoenas for these documents and communications on July 22.¹³

Documents produced pursuant to the Committees’ subpoenas show the collapse of ActBlue’s legal and compliance team in the months after the 2024 election. By March 2025, every member of ActBlue’s legal and compliance team resigned, was fired, or went on extended leave from the platform.¹⁴ According to subsequent media reports, this mass exodus was a direct consequence of ActBlue’s failure to deter illegal foreign political donations—which the Committees first uncovered in April 2025¹⁵—and CEO Regina Wallace-Jones’s previous misstatements to Congress.¹⁶ Put simply: every member of ActBlue’s legal and compliance team appears to have left the platform after the 2024 election because of its “knowing and willful” acceptance of illegal foreign contributions, and the subsequent cover-up.¹⁷

Indeed, public reporting indicates that ActBlue obstructed the Committees’ investigation from the outset. In October 2023, the Committee on House Administration requested information about ActBlue’s failure to require card verification values (CVVs) and deter fraud on the platform.¹⁸ ActBlue’s November 2023 response, signed by Wallace-Jones, made material misrepresentations about ActBlue’s processes for deterring illegal foreign donations¹⁹—which were, in fact, alarmingly weak.²⁰ Then, to cover up this misconduct, ActBlue withheld documents responsive to the Committees’ July 2025 subpoenas.²¹

Shortly after Election Day 2024, ActBlue fired General Counsel Darrin Hurwitz. As a condition of his termination, Hurwitz received a severance package of more than \$168,000 and signed an agreement that he would cooperate with ActBlue in any future investigation of the platform.²² Shortly after—and facing renewed scrutiny from the Committees for its suspect

¹² Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025) (on file with Comms.).

¹³ Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Ms. Regina Wallace-Jones, CEO, ActBlue (July 22, 2025) (attaching subpoena).

¹⁴ Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14; ActBlue Legal & Compliance Operations Specialist Resignation Letter (Mar. 4, 2025), *see* Ex. 13; Email from ActBlue HR Employee to Regina Wallace-Jones (Feb. 26, 2025, 5:01 PM), *see* Ex. 6.

¹⁵ ActBlue Staff Report I, *supra* note 2.

¹⁶ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

¹⁷ *Id.* (quoting memoranda prepared by ActBlue’s outside counsel).

¹⁸ Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., to Ms. Regina Wallace-Jones, CEO, ActBlue (Oct. 31, 2023).

¹⁹ Letter from Ms. Regina Wallace-Jones, CEO, ActBlue, to Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Nov. 27, 2023).

²⁰ ActBlue Staff Report I, *supra* note 2; Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

²¹ *See* Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Ms. Regina Wallace-Jones, CEO, ActBlue (Apr. 14, 2026).

²² Darrin Hurwitz Severance Total, *see* Ex. 1; Darrin Hurwitz Separation Agreement, *see* Ex. 2; Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

fraud-prevention practices²³—ActBlue’s outside counsel prepared two memoranda that “landed with a thud inside ActBlue,” causing an internal “meltdown.”²⁴ These memoranda detailed ActBlue’s apparently “knowing and willful” acceptance of illegal foreign donations and CEO Regina Wallace-Jones’s subsequent misstatements to Congress.²⁵ Once ActBlue’s outside counsel shared the memoranda with the company in February 2025, Interim General Counsel Aaron Ting, who had been offered the full-time job, abruptly quit.²⁶ Ting’s resignation letter, which ActBlue withheld from the Committees despite subpoenas compelling its production, stated that “I am concerned that leadership is not fully committed to transparently addressing with the Board the seriousness of our most pressing concerns: the legal compliance of ActBlue’s past practices for screening political donations from abroad and its past representations to Congress regarding foreign donations and related matters[.]”²⁷ Internal messages among ActBlue staff that were produced to the Committees merely stated that Ting was “really unhappy with what he[] [had] seen while being in the interim role” and was “more fed up that [sic] we realized.”²⁸

After Ting’s resignation, Legal Counsel Zain Ahmad was the last remaining lawyer on ActBlue’s legal team.²⁹ By default, he became the new interim head of legal, reporting directly to Wallace-Jones.³⁰ In one of his first acts, Ahmad forwarded the memoranda and related materials to ActBlue’s Board of Directors and other executives.³¹ Later that day, Ahmad went on a suspicious leave of absence, alleging that he faced retaliation for speaking up about internal misconduct.³² ActBlue Chief People & Culture Officer Candace King violated internal policy to lock Ahmad out of his email and other accounts³³—actions that ActBlue staff contemporaneously said “look[ed] like blatant retaliation.”³⁴ Amid this staff outcry, King

²³ Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., to Ms. Regina Wallace-Jones, CEO, ActBlue (Oct. 28, 2024); Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., to Ms. Regina Wallace-Jones, CEO, ActBlue (Oct. 30, 2024) (attaching subpoena); Letter from Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Ms. Regina Wallace-Jones, CEO, ActBlue (Dec. 9, 2024).

²⁴ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

²⁵ *Id.* (quoting memoranda).

²⁶ Internal ActBlue Employee Message (Feb. 21, 2025, 3:27 PM), *see* Ex. 3; Internal Message from Aaron Ting to Candace King (Feb. 14, 2025, 10:14 PM), *see* Ex. 4; *see also* Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

²⁷ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026) (quoting letter).

²⁸ Internal ActBlue Employee Message (Feb. 21, 2025, 3:28 PM), *see* Ex. 3; Internal ActBlue Employee Message (Feb. 18, 2025, 5:33 PM), *see* Ex. 5.

²⁹ Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14.

³⁰ Email from ActBlue HR Employee to Regina Wallace-Jones (Feb. 26, 2025, 5:01 PM), *see* Ex. 6.

³¹ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

³² *Id.*; Email from ActBlue HR Employee to Zain Ahmad (Feb. 25, 2025, 5:26 PM), *see* Ex. 7; Email from ActBlue HR Employee to Zain Ahmad (Feb. 25, 2025, 6:10 PM), *see* Ex. 8; Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14; *see also* Reid J. Epstein & Shane Goldmacher, *ActBlue, the Democratic Fund-Raising Powerhouse, Faces Internal Chaos*, N.Y. TIMES (Mar. 5, 2025).

³³ Internal Message from Candace King to ActBlue Employee (Feb. 26, 2025, 4:26 PM), *see* Ex. 18; ActBlue Leave of Absence & FMLA Guidance, *see* Ex. 20 (“While access to most systems will be paused” during an extended leave, “**essential tools such as email . . . will remain available** to ensure continuity if necessary.”) (emphasis added).

³⁴ Internal Message from ActBlue Employee to Candace King (Feb. 26, 2025, 11:46 PM), *see* Ex. 9.

relented and granted Ahmad access to his email again—on the condition that she could spy on it, using ActBlue’s internal security tools to “key in on him” and, presumably, to ensure that he did not jeopardize the cover-up.³⁵

The turmoil did not stop there. Two days after Ahmad’s leave began, ActBlue Director of Compliance Eric Hoke, who had been at the platform for well over a decade, “either quit . . . or was fired.”³⁶ Remaining ActBlue staff stated in internal messages that Hoke’s departure came because “the whole [legal and compliance] department [was] falling apart” following the revelations about ActBlue’s acceptance of illegal foreign donations and misleading statements to Congress.³⁷ One week later, in early March 2025, the last remaining employee on the legal and compliance team submitted her resignation.³⁸ At that point, ActBlue’s entire legal and compliance team had left the platform within the preceding four months.³⁹ ActBlue’s employee union wrote to the Board of Directors, stating that ActBlue staff who worked with the legal and compliance team “[did] not have clear direction on how to proceed with [their] work” in light of its disintegration.⁴⁰

It is unlawful “to solicit, accept, or receive a [political] contribution or donation” from “a foreign national.”⁴¹ Federal law also prohibits making “any materially false, fictitious, or fraudulent statement or representation” to Congress and failing to “produce papers upon any matter under inquiry before either House” if such papers are responsive to a congressional subpoena.⁴² ActBlue and Wallace-Jones appear to have done all three.

The Committees conducted five depositions with key ActBlue fraud-prevention and legal personnel to obtain more information about the fraud-prevention failures detailed in the Committees’ first report and the cover-up detailed here. The employees invoked their Fifth Amendment right against self-incrimination in response to *every single one* of the Committees’ substantive questions—146 times in total.⁴³ Their unwillingness to testify only amplifies the Committees’ concerns.

³⁵ Internal Messages between ActBlue Employee and Candace King (Feb. 27, 2025), *see* Ex. 10.

³⁶ Internal ActBlue Employee Message (Feb. 28, 2025), *see* Ex. 11; Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14.

³⁷ Internal ActBlue Employee Message (Feb. 28, 2025, 8:40 PM), *see* Ex. 12.

³⁸ ActBlue Legal & Compliance Operations Specialist Resignation Letter (Mar. 4, 2025), *see* Ex. 13; Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14.

³⁹ *Id.*; *see also* Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

⁴⁰ Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14.

⁴¹ 52 U.S.C. § 30121; 52 U.S.C. § 30109(d).

⁴² 18 U.S.C. § 1001; 2 U.S.C. § 192.

⁴³ Deposition of ActBlue Senior Workflow Specialist, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov’t Reform (July 15, 2025); Deposition of Alyssa Twomey, Former Vice President of Customer Service, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov’t Reform (July 23, 2025); Deposition of Aaron Ting, Former Director & Associate General Counsel, Product and Privacy, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov’t Reform (Nov. 17, 2025); Deposition of Darrin Hurwitz, Former General Counsel, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov’t Reform (Nov. 19, 2025); Deposition of Zain Ahmad, Legal Counsel, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov’t Reform (Dec. 5, 2025).

The Committees are committed to protecting the integrity of American elections and will continue investigating to inform potential legislative reforms to improve and strengthen our democracy. This oversight work is necessary and important to ensure that American elections are free, fair, and decided by Americans alone.

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RESIGNATIONS, FIRINGS, AND RETALIATION CLAIMS AFTER THE 2024 ELECTION

After the 2024 election, amid an internal “meltdown” over ActBlue’s apparently deliberate failure to prevent illegal foreign political donations and subsequent misrepresentations to Congress,⁴⁴ every member of the platform’s legal and compliance staff resigned, was fired, or went on extended leave while alleging that they had faced retaliation from ActBlue staff. In a 2023 letter to Congress, following inquiries into suspect fraud-prevention measures at ActBlue, CEO Regina Wallace-Jones misrepresented ActBlue’s fraud-prevention procedures for foreign political donations⁴⁵—which, in fact, were extremely weak.⁴⁶ In early 2025, ActBlue’s outside counsel raised concerns about potential legal exposure stemming from ActBlue’s alleged “knowing and willful” acceptance of illegal foreign political donations and Wallace-Jones’s misrepresentations to Congress on the topic.⁴⁷ Wallace-Jones’s refusal to address these vulnerabilities or correct the record spurred the resignations of long-serving legal and compliance staff, while the lawyer who alerted ActBlue’s Board of Directors to these serious allegations quickly went on leave and was locked out of his internal accounts in violation of company policy. By March 2025, every member of ActBlue’s legal and compliance team had left the company.

I. ActBlue’s entire internal legal team left the platform as outside counsel raised concerns about illegal conduct at ActBlue.

Between November 2024 and February 2025, amid grave allegations of illegal conduct at ActBlue, every lawyer on ActBlue’s legal and compliance staff either resigned, was fired, or went on extended leave while alleging internal retaliation.

a. ActBlue fired General Counsel Darrin Hurwitz in November 2024 with a generous severance package and an agreement to cooperate with ActBlue.

Turmoil within ActBlue’s legal and compliance team began on November 22, 2024, when ActBlue fired General Counsel Darrin Hurwitz. While he stopped work immediately, Hurwitz stayed on the ActBlue payroll through December and received a severance payment of \$168,187.50.⁴⁸ The basis for this significant severance package is unclear.

⁴⁴ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

⁴⁵ Letter from Ms. Regina Wallace-Jones, CEO, ActBlue, to Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Nov. 27, 2023).

⁴⁶ ActBlue Staff Report I, *supra* note 2; see also Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

⁴⁷ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026) (quoting memoranda).

⁴⁸ Darrin Hurwitz Severance Total, *see* Ex. 1; Darrin Hurwitz Separation Agreement, *see* Ex. 2.

review of ActBlue’s potential legal liability for past fraud-prevention practices.⁵³ The findings were alarming. First, because of ActBlue’s weak fraud-prevention standards, the outside counsel found “a substantial risk that some of the funds” raised for Democrat campaigns and causes by ActBlue “were impermissible contributions from foreign nationals.”⁵⁴ The outside counsel stated that ActBlue’s acceptance of illegal foreign contributions seemed deliberate: “ActBlue’s staff was aware that its system was not as robust as necessary,” making these violations appear “knowing and willful.”⁵⁵ It is unlawful “to solicit, accept, or receive a [political] contribution or donation” from “a foreign national.”⁵⁶ The Chairwoman of ActBlue’s Board of Directors, Kimberly Peeler-Allen, admitted later that up to \$38 million in contributions to Democrat campaigns and causes during the 2024 election cycle “had signs that they were from foreign countries.”⁵⁷ Unsurprisingly, ActBlue’s internal and external lawyers were concerned about the potential legal risks of ActBlue’s conduct.

This legal review also indicated that Wallace-Jones previously misled Congress about ActBlue’s review processes for foreign contributions. In November 2023, Wallace-Jones represented in a letter to the Committee on House Administration that “passport information is required from [ActBlue] donors providing an address outside of the United States” and that foreign donations are not processed without this “passport information.”⁵⁸ The legal review conducted by ActBlue’s outside counsel, however, found that Wallace-Jones’s claim was “not . . . entirely accurate,” as the passport checks “did not always happen” and were never conducted for transactions made through “third-party apps like Apple Pay, PayPal, or Venmo.”⁵⁹ Wallace-Jones also claimed that ActBlue “contributions that indicate a foreign country in the address information are set aside for manual review.”⁶⁰ Documents produced to the Committees indicate that this was untrue: contributions with foreign addresses in a select set of 28 countries were automatically rejected or manually reviewed, while contributions with foreign addresses outside of these countries received no additional scrutiny.⁶¹ ActBlue’s outside counsel wrote that the November 2023 letter could be seen “not just as a false statement but as an effort to conceal the foreign contributions”—a cover-up to mislead Congress and prevent it from discovering ActBlue’s previous misconduct.⁶²

⁵³ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

⁵⁴ *Id.* (quoting memoranda).

⁵⁵ *Id.* (quoting memoranda).

⁵⁶ 52 U.S.C. § 30121; 52 U.S.C. § 30109(d).

⁵⁷ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026); *PAC Profile: ActBlue*, OPEN SECRETS, <https://www.opensecrets.org/political-action-committees-pacs/actblue/C00401224/summary/2024> (last accessed Apr. 9, 2026).

⁵⁸ Letter from Ms. Regina Wallace-Jones, CEO, ActBlue, to Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Nov. 27, 2023).

⁵⁹ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

⁶⁰ Letter from Ms. Regina Wallace-Jones, CEO, ActBlue, to Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Nov. 27, 2023).

⁶¹ ActBlue Staff Report I, *supra* note 2, Ex. 1.

⁶² Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026) (quoting memoranda).

The outside counsel’s review concluded that “ActBlue did not have the rigor in its review of overseas donations that was required or that it had described to congressional investigators.”⁶³ ActBlue’s outside lawyers proposed that Wallace-Jones “correct the record,” noting “risks” associated with failing to do so.⁶⁴ Former Biden White House Counsel Dana Remus, who led the legal review, even recommended that Wallace-Jones hire a personal lawyer to navigate her own exposure.⁶⁵ Instead, Wallace-Jones “terminated” the law firm that conducted the review.⁶⁶ Wallace-Jones’s refusal to address either the apparent illegal contributions or her misstatements to Congress led every remaining member of ActBlue’s internal legal and compliance team to leave the company.

c. Associate General Counsel Aaron Ting abruptly resigned because of ActBlue’s misconduct and its potential legal ramifications.

After Hurwitz’s departure, ActBlue named Associate General Counsel Aaron Ting the interim leader of ActBlue’s legal team.⁶⁷ In his previous Associate General Counsel role, Ting had been a fraud-prevention “stakeholder[]” who “provide[d] legal oversight for decisions about fraud.”⁶⁸ While Ting served as the interim general counsel, ActBlue offered him the job to “head [legal and compliance]” on a permanent basis.⁶⁹ Instead, Ting quit, announcing to coworkers on February 14, 2025 that he would “leave ActBlue at the end of the month.”⁷⁰

Ting’s resignation letter plainly stated the reason for his departure: “ActBlue’s past practices for screening political donations from abroad and its past representations to Congress regarding foreign donations and related matters.”⁷¹ Ting wrote that he was “concerned that leadership [was] not fully committed to transparently addressing with the Board the seriousness of” ActBlue’s misconduct.⁷² Ting, as the lawyer responsible for overseeing ActBlue’s fraud-prevention program, may have played a role in the company’s alleged “knowing and willful” acceptance of foreign donations.⁷³ But even he would not go along with Wallace-Jones’s cover-up.

As part of this cover-up, ActBlue withheld Ting’s resignation letter from the Committees. On July 22, 2025, the Committees issued subpoenas for “[a]ll documents and communications referring or relating to whistleblowers, retaliation against whistleblowers, and actual or alleged misconduct by ActBlue staff” and “[a]ll documents and communications referring or relating to the resignations of staff in ActBlue’s Office of the General Counsel[.]”⁷⁴ Ting’s resignation letter

⁶³ *Id.*

⁶⁴ *Id.* (quoting memoranda).

⁶⁵ *Id.*

⁶⁶ *Id.*

⁶⁷ Internal ActBlue Employee Message (Feb. 21, 2025, 3:28 PM), *see* Ex. 3.

⁶⁸ ActBlue internal memorandum, *Model Governance Committee/Trust & Safety Team Proposal*; *see* Ex. 15.

⁶⁹ Internal ActBlue Employee Message (Feb. 21, 2025, 3:27 PM), *see* Ex. 3.

⁷⁰ Internal Message from Aaron Ting to Candace King (Feb. 14, 2025, 10:14 PM); *see* Ex. 4.

⁷¹ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026) (quoting letter).

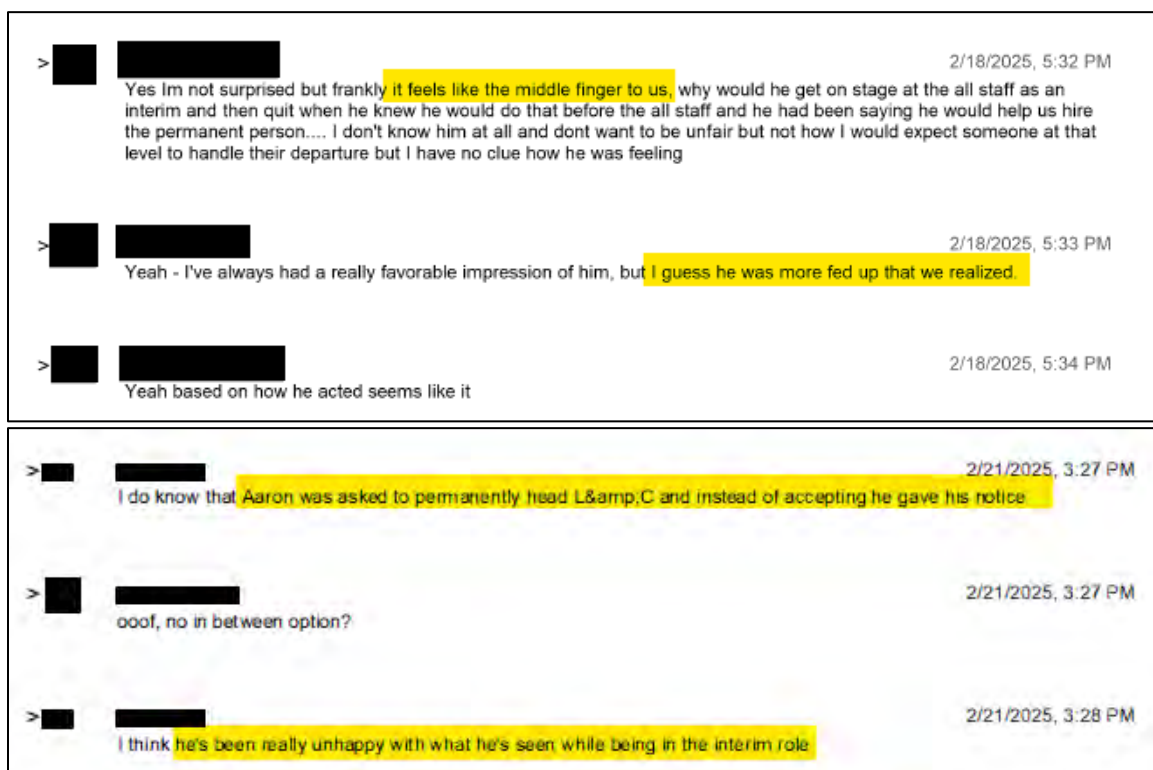
⁷² *Id.* (quoting letter).

⁷³ *Id.* (quoting memoranda).

⁷⁴ Document Subpoena to ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov’t Reform, Schedule A (July 22, 2025).

is undeniably responsive to these subpoenas—but ActBlue never produced it. Instead, on October 27, 2025, ActBlue represented to the Committees that it had produced “[a]ll non-privileged documents with responsive, relevant information.”⁷⁵

Yet ActBlue did produce *other* internal communications related to Ting’s resignation—ones that lacked evidence of gross misconduct by ActBlue executives. This only strengthens the appearance that ActBlue deliberately withheld materials responsive to the Committees’ subpoenas that contained evidence of foul play. Internal messages among ActBlue employees produced to the Committees stated that Ting departed because he was “really unhappy with what he[] [had] seen while being in the interim role,” while another employee wrote that Ting was “more fed up that [sic] we realized.”⁷⁶ One employee chimed in to say that Ting’s departure “feels like the middle finger to [ActBlue employees].”⁷⁷ On February 24, Ting notified other employees that it would be his last day—four days ahead of his intended departure.⁷⁸



Internal messages stated that Ting was “really unhappy with what he[] [had] seen” during his interim tenure leading ActBlue’s legal team.

Ting would not be the last casualty on the legal and compliance team.

⁷⁵ Letter from Mr. Vincent Cohen, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Oct. 27, 2025) (on file with Comms.).

⁷⁶ Internal ActBlue Employee Message (Feb. 21, 2025, 3:28 PM), *see* Ex. 3; Internal ActBlue Employee Message (Feb. 18, 2025, 5:33 PM), *see* Ex. 5.

⁷⁷ Internal ActBlue Employee Message (Feb. 18, 2025, 5:32 PM), *see* Ex. 5.

⁷⁸ Email from Aaron Ting to ActBlue Employees (Feb. 24, 2025, 8:18 AM), *see* Ex. 16.

d. ActBlue appears to have retaliated against Legal Counsel Zain Ahmad and locked him out of his internal accounts in violation of company policy after he shared information with ActBlue’s Board of Directors.

After Ting’s resignation, Legal Counsel Zain Ahmad was the only remaining lawyer on ActBlue’s legal and compliance team.⁷⁹ By default, Ahmad became the new interim head of legal, reporting directly to Wallace-Jones.⁸⁰ On his first full day, February 25, 2025, Ahmad sent the memoranda from ActBlue’s outside counsel detailing the platform’s misconduct “to the ActBlue board of directors [and] ActBlue’s executive leadership team[.]”⁸¹

Later that day, Ahmad went on a “leave of absence.”⁸² While the absence was processed internally as medical leave, documents show that human resources (HR) officials who worked on the request suspected that the real reason was “something else.”⁸³ HR processed and granted Ahmad’s leave request within an hour, despite ActBlue’s internal guidelines noting that processing of leave requests takes five to seven days.⁸⁴ On February 26, HR staff notified Wallace-Jones that Ahmad would be taking leave and that he would “maintain access to essential tools,” including his ActBlue email and Slack accounts.⁸⁵

We want to keep you informed about the process for employees taking leaves longer than 30 days. During this time, your team member’s access to most internal systems will be temporarily restricted. However, they will maintain access to essential tools, specifically email, Slack, UKG, and Confluence.

An email to ActBlue CEO Regina Wallace-Jones informed her that Ahmad was going on leave and stated that he would retain access to internal systems.

Despite HR staff’s assertion that Ahmad would retain access to his ActBlue accounts, ActBlue Chief People & Culture Officer Candace King violated internal policy and locked Ahmad out of his email and other internal systems.⁸⁶ ActBlue’s formal leave handbook deems email access “essential” for employees on leave and states that email “will remain available” for them.⁸⁷ Yet, on February 26, King ordered a subordinate to ensure that Ahmad was “unable to access” his email account and Google Drive.⁸⁸ Ahmad, consistent with his legal and ethical

⁷⁹ Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14; *see* Reid J. Epstein & Shane Goldmacher, *ActBlue, the Democratic Fund-Raising Powerhouse, Faces Internal Chaos*, N.Y. TIMES (Mar. 5, 2025) (“Zain Ahmad . . . was the last remaining lawyer in the ActBlue general counsel’s office.”).

⁸⁰ Email from ActBlue HR Employee to Regina Wallace-Jones (Feb. 26, 2025, 5:01 PM), *see* Ex. 6.

⁸¹ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

⁸² Email from ActBlue HR Employee to Regina Wallace-Jones (Feb. 26, 2025, 5:01 PM), *see* Ex. 6; *see* Email from ActBlue HR Employee to Zain Ahmad (Feb. 25, 2025, 5:26 PM), Ex. 7; Email from ActBlue HR Employee to Zain Ahmad (Feb. 25, 2025, 6:10 PM), Ex. 8.

⁸³ Internal Message from ActBlue Employee to Candace King (Feb. 25, 2025, 8:44 PM), *see* Ex. 17.

⁸⁴ ActBlue Leave of Absence & FMLA Guidance, *see* Ex. 20; Email from ActBlue HR Employee to Zain Ahmad (Feb. 25, 2025, 5:26 PM), *see* Ex. 7; Email from ActBlue HR Employee to Zain Ahmad (Feb. 25, 2025, 6:10 PM), *see* Ex. 8.

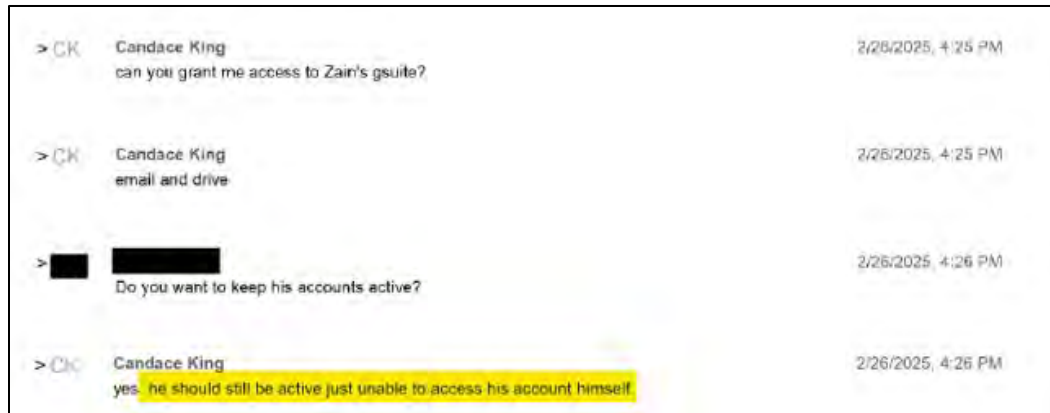
⁸⁵ Email from ActBlue HR Employee to Regina Wallace-Jones (Feb. 26, 2025, 5:01 PM), *see* Ex. 6.

⁸⁶ Internal Message from Candace King to ActBlue Employee (Feb. 26, 2025, 4:26 PM), *see* Ex. 18; ActBlue Leave of Absence & FMLA Guidance, *see* Ex. 20.

⁸⁷ ActBlue Leave of Absence & FMLA Guidance, *see* Ex. 20.

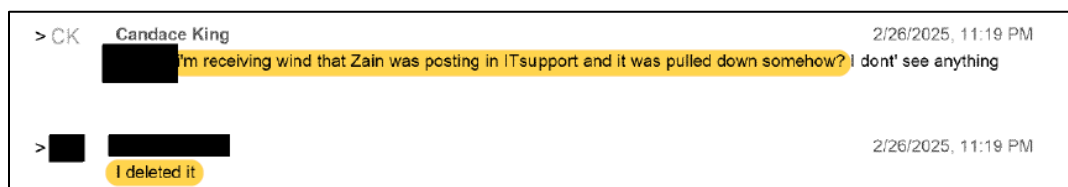
⁸⁸ Internal Message from Candace King to ActBlue Employee (Feb. 26, 2025, 4:26 PM), *see* Ex. 18.

responsibilities, notified ActBlue leadership of credible allegations of misconduct at the company, including significant violations of federal campaign finance law and false statements to Congress.⁸⁹ Subsequently, Ahmad went on a suspicious leave of absence while ActBlue’s top HR official violated internal policy to lock him out of his “essential” accounts.⁹⁰



Chief People & Culture Officer Candace King ordered her staff to lock Zain Ahmad out of his email account.

However, Ahmad retained access to Slack, ActBlue’s internal messaging platform. After HR revoked Ahmad’s access to email and other internal systems, he posted a Slack message stating that “we have Anti-Retaliation and Whistleblower Policies for a reason,” appearing to claim that he was retaliated against for blowing the whistle on ActBlue’s misconduct.⁹¹ One of King’s deputies swiftly “deleted” the message.⁹² To date, ActBlue has not produced this message to the Committees despite extensive evidence corroborating its existence,⁹³ once again indicating deliberate stonewalling of the Committees’ investigation.



One of King’s staff members deleted Ahmad’s internal message alleging that he was being retaliated against.

After Ahmad’s message was deleted, ActBlue employees spoke up, telling senior officials that Ahmad’s treatment appeared to be retaliatory. A member of King’s staff told her that

⁸⁹ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

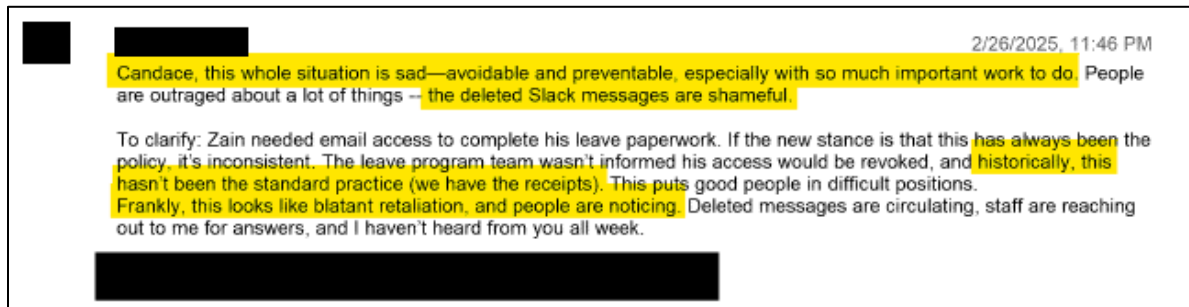
⁹⁰ ActBlue Leave of Absence & FMLA Guidance, *see* Ex. 20.

⁹¹ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026) (quoting message).

⁹² Internal Message from ActBlue Employee to Candace King (Feb. 26, 2025, 11:19 PM), *see* Ex. 18.

⁹³ *Id.*; Internal Message from ActBlue Employee to Candace King (Feb. 26, 2025, 11:46 PM), *see* Ex. 9; Reid J. Epstein & Shane Goldmacher, *ActBlue, the Democratic Fund-Raising Powerhouse, Faces Internal Chaos*, N.Y. TIMES (Mar. 5, 2025); Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

Ahmad's treatment was "shameful," noting that it was out of line with "the standard practice" and warning that she "ha[d] the receipts."⁹⁴ The employee told King that Ahmad's treatment "look[ed] like blatant retaliation" and that "people [were] noticing."⁹⁵ Shortly after sending this message, the employee resigned.⁹⁶ Yet King remained defiant, telling a top deputy that "we are not restoring access" to Ahmad's email.⁹⁷



One employee told King that Ahmad's treatment looked like "blatant retaliation."

The next day, amid a staff uproar, King relented and restored Ahmad's access to ActBlue's internal systems—with a catch.⁹⁸ King still "want[ed] access to his emails" so that she could monitor Ahmad's communications without him knowing.⁹⁹ The apparent reason: King wanted to make sure that Ahmad did not tell anybody else about ActBlue's potentially illegal conduct. King's staff informed her that they could use ActBlue's "sec[urity] tooling" to "monitor [his] behavior."¹⁰⁰ King, emphasizing her desire to "key in on [Ahmad]," said that would be "great."¹⁰¹

⁹⁴ Internal Message from ActBlue Employee to Candace King (Feb. 26, 2025, 11:46 PM), *see* Ex. 9.

⁹⁵ *Id.*

⁹⁶ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

⁹⁷ Internal Message from Candace King to ActBlue Employee (Feb. 26, 2025, 11:20 PM), *see* Ex. 18.

⁹⁸ Internal Message from Candace King to ActBlue Employee (Feb. 27, 2025, 12:26 AM), *see* Ex. 10.

⁹⁹ Internal Message from Candace King to ActBlue Employee (Feb. 27, 2025, 12:36 AM), *see* Ex. 10.

¹⁰⁰ Internal Message from ActBlue Employee to Candace King (Feb. 27, 2025, 12:38 AM), *see* Ex. 10.

¹⁰¹ Internal Message from Candace King to ActBlue Employee (Feb. 27, 2025, 12:38 AM), *see* Ex. 10.



King used internal security tools to spy on Ahmad's email after she reinstated it.

Ahmad's leave was scheduled to last 12 weeks.¹⁰² It is unclear who led ActBlue's legal and compliance team after Ahmad left the platform, whether Ahmad returned to ActBlue after this leave, or in what capacity. What is clear: ActBlue executives appear to have retaliated against Ahmad after he spoke up about the platform's acceptance of illegal foreign money and Wallace-Jones's apparent false statements to Congress.

* * *

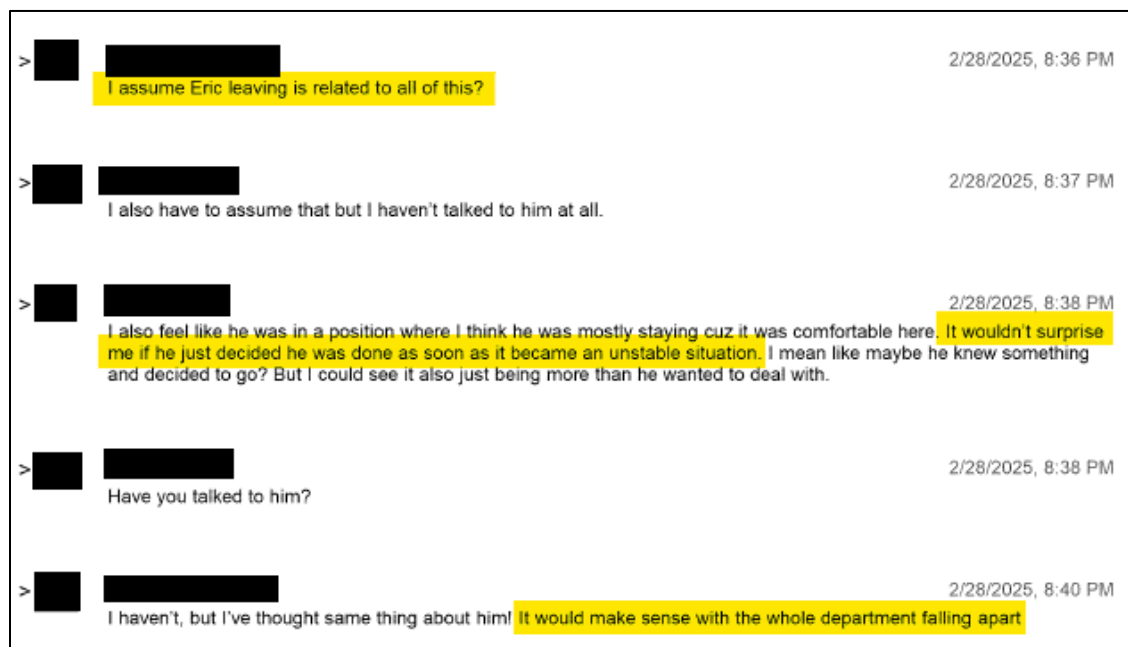
In the months after the 2024 election, as it became apparent that ActBlue and Wallace-Jones faced significant legal liability for accepting illegal foreign political contributions, every member of ActBlue's legal team left the platform. General Counsel Darrin Hurwitz accepted a \$168,000 severance payment and agreed to cooperate with ActBlue on his response to any future investigation of misconduct at the platform. Hurwitz's interim replacement, Aaron Ting, left ActBlue rather than take the job permanently because ActBlue refused to address these glaring legal issues. Zain Ahmad, the last remaining lawyer on the legal staff, blew the whistle on this misconduct, informing the Board of Directors and other ActBlue executives. Within a day, Ahmad went on a suspicious "leave of absence" and was locked out of his "essential" accounts in violation of internal policy.¹⁰³ He alleged whistleblower retaliation in an internal message, which ActBlue staff promptly deleted. Finally, once a staff outcry led ActBlue to restore Ahmad's email account, top HR officials spied on him to ensure that he could not blow the whistle to anybody else. ActBlue's legal team collapsed for a simple reason: ActBlue and Wallace-Jones likely broke the law, and Wallace-Jones refused to do anything about it.

¹⁰² Internal Message from Candace King to ActBlue Employee (Feb. 25, 2025, 8:43 PM), *see* Ex. 17.

¹⁰³ Email from ActBlue HR Employee to Regina Wallace-Jones (Feb. 26, 2025, 5:01 PM), *see* Ex. 6; ActBlue Leave of Absence & FMLA Guidance, *see* Ex. 20

II. ActBlue’s internal compliance team collapsed within a week after Ahmad went on leave.

ActBlue also has a “compliance” team that works with the legal team to fulfill ActBlue’s legal and regulatory obligations. This team presumably would have been expected to pick up the slack after the legal team’s disintegration, especially amid allegations that ActBlue previously failed to comply with applicable federal law by accepting illegal foreign donations.¹⁰⁴ Instead, on February 27, 2025—just two days after Ahmad went on leave—Director of Compliance Eric Hoke “either quit . . . or was fired” after more than a dozen years at ActBlue.¹⁰⁵ Hoke had previously been listed as a fraud-prevention “stakeholder[]” and was involved in the review process for changes to ActBlue’s fraud-prevention policies—including their weakening in 2024.¹⁰⁶ ActBlue employees attributed Hoke’s departure to the “unstable situation” in the legal and compliance department, noting that “the whole department [was] falling apart” following the revelations about ActBlue’s potentially illegal conduct.¹⁰⁷



ActBlue employees discussed Director of Compliance Eric Hoke’s departure.

After Hoke’s departure, “only one person” remained on ActBlue’s “substantially weakened” compliance staff.¹⁰⁸ That person—ActBlue’s Legal and Compliance Operations Specialist—resigned the following week, in early March 2025.¹⁰⁹

¹⁰⁴ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

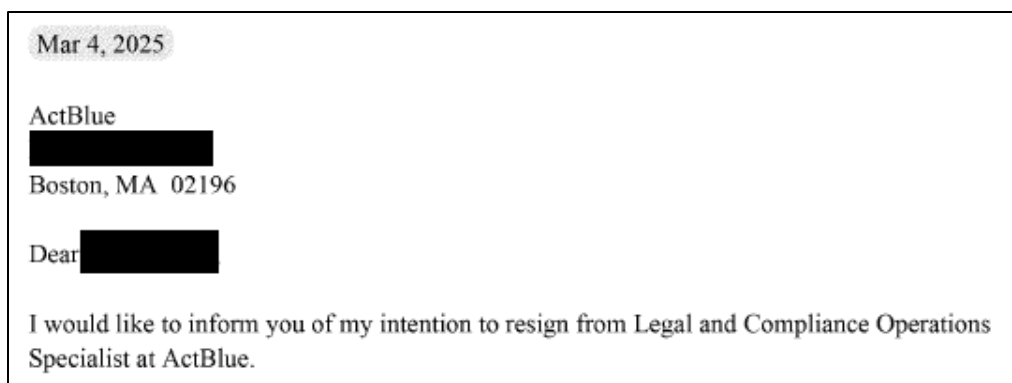
¹⁰⁵ Internal ActBlue Employee Message (Feb. 28, 2025), *see* Ex. 11; Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14.

¹⁰⁶ ActBlue internal memorandum, *Fraud Prevention Stakeholders Writeup [2023]* *see* Ex. 19; ActBlue Staff Report I, *supra* note 2, Ex. 3.

¹⁰⁷ Internal ActBlue Employee Messages (Feb. 28, 2025, 8:38 PM), *see* Ex. 12.

¹⁰⁸ Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14.

¹⁰⁹ ActBlue Legal & Compliance Operations Specialist Resignation Letter (Mar. 4, 2025); *see* Ex. 13.



ActBlue's last compliance staffer resigned shortly after Eric Hoke.

With these additional departures, ActBlue's legal and compliance team had been thoroughly gutted. Following credible allegations by ActBlue's own outside counsel that the platform had "facilitated the acceptance of foreign-national contributions into American elections" and then lied to Congress to cover it up,¹¹⁰ every member of ActBlue's legal and compliance team left the platform between November 2024 and March 2025.¹¹¹

III. ActBlue's union raised concerns to the Board of Directors during this staff exodus.

On February 27, 2025, amid the internal "meltdown" following the revelations about ActBlue's years-long misconduct,¹¹² members of the ActBlue union wrote to the ActBlue Board of Directors to share "serious concerns about the state of the organization."¹¹³ The union letter cited "an alarming pattern" of "constant turnover" that eroded the union's "confidence in the stability of the organization."¹¹⁴ The union called Ahmad's treatment "incredibly alarming," "deeply unsettling[,] and disturbing" and noted that in the wake of Ahmad's departure, ActBlue staff who worked with the legal and compliance team "[did] not have clear direction on how to proceed with our work."¹¹⁵ This raises further concerns about ActBlue's compliance with applicable campaign finance law following the disintegration of the legal and compliance team. If ActBlue was unable to comply with the law during the period when it had a fully staffed legal and compliance team, it is unclear how it could have done so without a single legal or compliance employee. Ultimately, the union demanded that ActBlue retain outside counsel to investigate potential misconduct and "evaluate if our CEO is doing her job in an appropriate, competent, and responsible manner."¹¹⁶

¹¹⁰ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026) (quoting memoranda).

¹¹¹ Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14; ActBlue Legal & Compliance Operations Specialist Resignation Letter (Mar. 4, 2025), *see* Ex. 13.

¹¹² Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

¹¹³ Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 14.

¹¹⁴ *Id.*

¹¹⁵ *Id.*

¹¹⁶ *Id.*

On Thu, Feb 27, 2025 at 7:38 PM ActBlue Union <[REDACTED]@campaignworkersguild.org> wrote:

As staff from across ActBlue, we feel compelled to share our serious concerns about the state of the organization. Over the last two years, we've navigated nearly constant turnover in leadership positions. The dramatic uptick in the last few weeks has indicated an alarming pattern, making it difficult for us to do our work and eroding our confidence in the stability of the organization. In the last few months alone, we've seen the departure of the following leaders:

- Darrin Hurwitz, General Counsel, 1 year 6 month tenure, departed 11/22/2024
- Alyssa Twomey, VP of Customer Service, 14 year tenure, departed 02/21/2025

- Aaron Ting, Associate General Counsel, 15 month tenure, departed 2/24/2025 (five days prior to originally planned departure date)

In the hyper-partisan, tenuous political climate we find ourselves in today, the organization is under increasing scrutiny and is the target of bad-faith political attacks at the hands of ill-intentioned operators. With this context, we are particularly concerned about the departure of leaders who focused on legal and compliance work. Those of us who work with our legal team in our day-to-day do not have clear direction on how to proceed with our work in their absence. We have not received information from the Executive Leadership Team about who will step into these roles or who will lead the defense of our work in the months since Darrin's departure.

Furthermore, in an incredibly alarming development this week, our only remaining Legal Counsel on staff posted in a Slack channel and alluded to possible violations of our Time Off and Leave Policy, Non-Retaliation Policy, and Whistleblower Protection Policy. Their messages were swiftly deleted from the channel without acknowledgement. We find this deeply unsettling and disturbing, and part of a growing pattern of volatility and toxicity stemming from current leadership.

As the workers who are crucial to the organization's continued success, and as people with a fundamental interest in seeing ActBlue remain a reliable and trusted platform, we ask the board urgently take the following steps:

- Retain independent outside counsel
- Utilize that independent outside counsel to conduct exit interviews of all of the above leaders and others who have left ActBlue in recent weeks
- Utilize that independent outside counsel to take other investigatory actions to better understand the current state of the organization and evaluate if our CEO is doing her job in an appropriate, competent, and responsible manner
- Take corrective actions based on the findings

Signed,
ActBlue Tech Workers Union (ABTWU) and ActBlue Union (AB1U)

A letter from ActBlue's union to the Board of Directors expressed concerns with mass resignations and questioned ActBlue's ability to comply with ongoing legal obligations.

Despite multiple requests by the Committees, ActBlue has refused to share any information about investigatory actions by outside counsel, as demanded by its union.¹¹⁷ It is unclear whether ActBlue has retained outside counsel for such an investigation, whether an investigation is underway, or if there are findings from any completed investigations.

IV. ActBlue’s alleged acceptance of foreign donations and obstruction of a congressional investigation raise serious questions about its compliance with federal laws and regulations.

ActBlue’s misconduct is significant. First, ActBlue appears to have accepted illegal foreign political donations. The review by ActBlue’s outside counsel stated that because of ActBlue’s weak fraud-prevention measures, there was “a substantial risk that some of the funds received” by ActBlue during the 2024 election cycle, and potentially even before that, “were impermissible contributions from foreign nationals.”¹¹⁸ This was not a mere oversight. ActBlue’s counsel found that “ActBlue’s staff was aware that its system was not as robust as necessary” to deter foreign interference and comply with federal law.¹¹⁹ Because ActBlue knew about vulnerabilities and failed to patch them, the review concluded, there were grounds to believe that ActBlue’s “violations were knowing and willful.”¹²⁰ Under federal law, it is “unlawful” to “solicit, accept, or receive a [political] contribution or donation . . . from a foreign national.”¹²¹ According to ActBlue Board Chairwoman Kimberly Peeler-Allen, ActBlue may have processed up to \$38 million in foreign contributions during the 2024 election cycle.¹²²

Second, CEO Regina Wallace-Jones impermissibly misrepresented ActBlue’s fraud-prevention practices for foreign donations in a November 2023 letter to the Committee on House Administration. In that letter, Wallace-Jones categorically stated that “passport information is required from donors providing an address outside of the United States.”¹²³ But this “turned out not to be entirely accurate”: the internal review found that foreign “donors who paid through third-party apps like Apple Pay, PayPal or Venmo were not asked for passport information.”¹²⁴ Similarly, Wallace-Jones claimed that “if a contribution appears to be from a foreign address, ActBlue contacts the donor to request United States passport information.”¹²⁵ This, too, “did not

¹¹⁷ See Letter from Mr. Vincent Cohen, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Oct. 27, 2025) (on file with Comms.).

¹¹⁸ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026) (quoting memoranda).

¹¹⁹ *Id.* (quoting memoranda).

¹²⁰ *Id.* (quoting memoranda).

¹²¹ 52 U.S.C. § 30121; 52 U.S.C. § 30109(d).

¹²² Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026); *PAC Profile: ActBlue*, OPEN SECRETS, <https://www.opensecrets.org/political-action-committees-pacs/actblue/C00401224/summary/2024> (last accessed Apr. 9, 2026).

¹²³ Letter from Ms. Regina Wallace-Jones, CEO, ActBlue, to Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Nov. 27, 2023).

¹²⁴ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

¹²⁵ Letter from Ms. Regina Wallace-Jones, CEO, ActBlue, to Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Nov. 27, 2023).

always happen,” according to ActBlue’s own outside counsel.¹²⁶ Finally, Wallace-Jones wrote that “contributions that indicate a foreign country in the address information are set aside for manual review.”¹²⁷ Contemporaneous documents produced to the Committees indicate that contributions from approximately 170 countries were *not* manually reviewed, contradicting Wallace-Jones’s claim.¹²⁸

Finally, ActBlue withheld documents responsive to the Committees’ July 2025 subpoena that would have shed light on the scandal and cover-up. The Committees’ subpoenas compelled ActBlue to produce “[a]ll documents and communications referring or relating to whistleblowers, retaliation against whistleblowers, and actual or alleged misconduct by ActBlue staff” and “[a]ll documents and communications referring or relating to the resignations of staff in ActBlue’s Office of the General Counsel[.]”¹²⁹ In October 2025, ActBlue represented to the Committees that it had produced “[a]ll non-privileged documents with responsive, relevant information.”¹³⁰ Yet ActBlue never produced Interim General Counsel Aaron Ting’s resignation letter, which stated that Ting was resigning because of his concerns about ActBlue and Wallace-Jones’s potentially illegal conduct and the platform’s refusal to address these risks.¹³¹ ActBlue produced other documents and communications related to Ting’s resignation—just not the one that would have detailed ActBlue’s extensive misconduct. Likewise, ActBlue withheld the internal message in which Zain Ahmad alleged that he was being retaliated against for blowing the whistle on internal misconduct.

ActBlue’s deliberate acceptance of foreign donations and its subsequent obstruction of congressional oversight amount to serious misconduct and potentially illegal actions.

KEY ACTBLUE OFFICIALS INVOKED THEIR FIFTH AMENDMENT RIGHT TO AVOID THE COMMITTEES’ QUESTIONS

To further the Committees’ oversight of ActBlue’s weak fraud-prevention practices and allegations of internal misconduct and retaliation, the Committees issued subpoenas for depositions with five key ActBlue personnel. These employees were:

- ActBlue’s Senior Workflow Specialist, who manages fraud prevention on ActBlue day-to-day;¹³²

¹²⁶ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

¹²⁷ Letter from Ms. Regina Wallace-Jones, CEO, ActBlue, to Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Nov. 27, 2023).

¹²⁸ ActBlue Staff Report I, *supra* note 2, Ex. 1.

¹²⁹ Document Subpoena to ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov’t Reform, Schedule A (July 22, 2025).

¹³⁰ Letter from Mr. Vincent Cohen, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Oct. 27, 2025) (on file with Comms.).

¹³¹ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

¹³² Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to ActBlue Senior Workflow

- Former Vice President of Customer Service Alyssa Twomey, the executive responsible for overseeing ActBlue’s fraud-prevention team during the 2024 election cycle;¹³³
- Former General Counsel Darrin Hurwitz;¹³⁴
- Former Director and Associate General Counsel Aaron Ting, who “provide[d] legal oversight for decisions about fraud” and resigned rather than participate in ActBlue’s cover-up;¹³⁵ and
- Legal Counsel Zain Ahmad, who appears to have been retaliated against by ActBlue executives for blowing the whistle.¹³⁶

Across these five depositions, the current and former ActBlue employees declined to answer a single one of the Committees’ substantive questions, collectively invoking their Fifth Amendment right 146 times. The ActBlue employees refused to answer basic questions, including:

- Whether they could give truthful testimony to the Committees:

Q. Is there any reason you are unable to provide truthful answers to today’s questions?

Ms. Twomey. On the advice of counsel, I must respectfully decline to answer, in reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I must follow my lawyers’ advice in

Specialist (June 25, 2025) (attaching subpoena); see ActBlue Staff Report I, *supra* note 2, Ex. 5, 13, 16, 17, 24, 29, 34, 48-50.

¹³³ Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Ms. Alyssa Twomey, Former Vice President of Customer Service, ActBlue (June 25, 2025) (attaching subpoena); see ActBlue Staff Report I, *supra* note 2, Ex. 33.

¹³⁴ Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Mr. Darrin Hurwitz, Former General Counsel, ActBlue (Sep. 4, 2025) (attaching subpoena).

¹³⁵ Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Mr. Aaron Ting, Former Director & Associate General Counsel, Product and Privacy, ActBlue (Sep. 4, 2025) (attaching subpoena); see ActBlue internal memorandum, *Model Governance Committee/Trust & Safety Team Proposal*; see Ex. 15; Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

¹³⁶ Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Mr. Zain Ahmad, Legal Counsel, ActBlue (Sep. 4, 2025) (attaching subpoena); Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026). It is unclear whether Mr. Ahmad remains employed by ActBlue, or in what position.

this matter.¹³⁷

- When they worked at ActBlue:

Q. Mr. Hurwitz, when did you work at ActBlue?

Mr. Hurwitz. On the advice of counsel, I must respectfully decline to answer based upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to the Constitution. I must follow my lawyer's advice in this matter.¹³⁸

- What they did at ActBlue:

Q. Thank you. What did you do at ActBlue?

Mr. Ting. On the advice of counsel, I must respectfully decline to answer based upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to the Constitution. I must follow my lawyer's advice in this matter.¹³⁹

- Why ActBlue took a “more lenient” approach to fraud in 2024:

Q. According to documents produced to the committee, ActBlue took a “more lenient approach” to fraud in 2024 by increasing Sift score thresholds. Why did ActBlue take a more lenient approach to fraud in 2024?

Senior Workflow Specialist. On the advice of counsel, I must respectfully decline to answer, in reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I must follow my lawyer's advice in this matter.¹⁴⁰

- Whether ActBlue executives instructed them to allow more fraud on the platform:

Q. Have ActBlue executives ever instructed you to

¹³⁷ Deposition of Alyssa Twomey, Former Vice President of Customer Service, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 10 (July 23, 2025).

¹³⁸ Deposition of Darrin Hurwitz, Former General Counsel, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 11 (Nov. 19, 2025).

¹³⁹ Deposition of Aaron Ting, Former Director & Associate General Counsel, Product and Privacy, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 10 (Nov. 17, 2025).

¹⁴⁰ Deposition of ActBlue Senior Workflow Specialist, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 15 (July 15, 2025); *see* ActBlue Staff Report I, *supra* note 2, at 6-7.

allow more fraud on the platform or weaken ActBlue's fraud-prevention defenses?

Senior Workflow Specialist. On the advice of counsel, I must respectfully decline to answer, in reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I must follow my lawyer's advice in this matter.¹⁴¹

- Whether they had been part of a conspiracy to launder foreign money to Democrat campaigns:

Q. Have you ever been part of a conspiracy to launder foreign money into fraudulent donations for campaigns using ActBlue?

Senior Workflow Specialist. On the advice of counsel, I must respectfully decline to answer, in reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I must follow my lawyer's advice in this matter.¹⁴²

- Whether the practice of "smurfing," in which bad actors make fraudulent donations using the names and addresses of real people, is prevalent on ActBlue:

Q. Is the practice of smurfing, in which bad actors make fraudulent donations using the personal information of real people, prevalent at ActBlue?

Mr. Ting. On the advice of counsel, I must respectfully decline to answer based upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to the Constitution. I must follow my lawyer's advice in this matter.¹⁴³

- Whether ActBlue banned donations made using gift or foreign prepaid cards shortly before the 2024 election because of significant fraud using these mechanisms:

Mr. Gooden. [. . .] Shortly before the election, there were policy changes at ActBlue to ban contributions from foreign prepaid cards and gift cards. What

¹⁴¹ Deposition of ActBlue Senior Workflow Specialist, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 16 (July 15, 2025).

¹⁴² *Id.* at 14-15.

¹⁴³ Deposition of Aaron Ting, Former Director & Associate General Counsel, Product and Privacy, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 14 (Nov. 17, 2025).

was the reason for these bans? And did you or someone at ActBlue observe any issues being caused by these modes of payment?

Mr. Hurwitz. On the advice of counsel, I must respectfully decline to answer based upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to the Constitution. I must follow my lawyer's advice in this matter.

Mr. Gooden. ActBlue's records indicate that abuse of prepaid cards and gift cards was prevalent. And I'm curious, why was this ban instituted only a couple of weeks before the election?

Mr. Hurwitz. On the advice of counsel, I must respectfully decline to answer based upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to the Constitution. I must follow my lawyer's advice in this matter.¹⁴⁴

- Whether mass resignations after the 2024 election were related to fraud on ActBlue:

Q. Did members of ActBlue's legal and compliance teams leave ActBlue after the 2024 election because of the platform's inability to prevent fraud during previous election cycles?

Mr. Ahmad. On the advice of counsel, I must respectfully decline to answer based upon the attorney-client privilege, and in reliance on my right under the Fifth Amendment to the Constitution. I must follow my lawyer's advice in this matter.¹⁴⁵

- Why ActBlue leadership granted Darrin Hurwitz such a large severance package:

Mr. Gooden. You received a severance package of almost \$170,000. Did you receive that for resigning or being terminated from your position at ActBlue or for any other reason?

Mr. Hurwitz. On the advice of counsel, I must respectfully

¹⁴⁴ Deposition of Darrin Hurwitz, Former General Counsel, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 13 (Nov. 19, 2025).

¹⁴⁵ Deposition of Zain Ahmad, Legal Counsel, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 10 (Dec. 5, 2025).

decline to answer based upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to the Constitution. I must follow my lawyer's advice in this matter.¹⁴⁶

- Whether Zain Ahmad was retaliated against for blowing the whistle on pervasive misconduct:

Q. Were you retaliated against for blowing the whistle on misconduct related on [sic] fraud prevention at ActBlue?

Mr. Ahmad. On the advice of counsel, I must respectfully decline to answer based upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to the Constitution. I must follow my lawyer's advice in this matter.¹⁴⁷

- Whether ActBlue was able to carry out its legal obligations after the entire legal and compliance team left:

Q. After the entire legal and compliance team quit, was fired, or went on leave, was ActBlue able to carry out its legal obligations and deter bad actors?

Mr. Ahmad. On the advice of counsel, I must respectfully decline to answer based upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to the Constitution. I must follow my lawyer's advice in this matter.¹⁴⁸

- Whether they understood that they could freely share information with the Committees about their time at ActBlue:

Mr. Biggs. [. . .] [Y]ou are aware, Ms. Twomey, that you do have a choice; you could answer these questions?

Ms. Twomey. On the advice of counsel, I must respectfully decline to answer, in reliance on my right under the Fifth Amendment to the Constitution. I am not

¹⁴⁶ Deposition of Darrin Hurwitz, Former General Counsel, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 14 (Nov. 19, 2025).

¹⁴⁷ Deposition of Zain Ahmad, Legal Counsel, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 10 (Dec. 5, 2025).

¹⁴⁸ *Id.*

a lawyer, and I must follow my lawyer's advice in this matter.¹⁴⁹

Every ActBlue employee called before the Committees chose to invoke their Fifth Amendment right. Not a single employee offered testimony that could help ensure that American elections are free, fair, and decided by Americans alone.

CONCLUSION

The crux of this misconduct is simple: ActBlue appears to have accepted illegal foreign donations en masse and tried to cover it up, lying to and withholding information from Congress in the process. It is not only the Committees that allege this—it is what ActBlue's own outside lawyers found during a legal review of the platform's fraud-prevention practices and statements to Congress. ActBlue's legal and compliance team, alarmed by this finding and CEO Regina Wallace-Jones's refusal to address it appropriately, disintegrated. Between November 2024 and March 2025, every member of the team resigned, was fired, or went on extended leave while alleging internal retaliation. This included General Counsel Darrin Hurwitz, given a generous severance package upon his firing while agreeing to coordinate with ActBlue before responding to any future investigation of misconduct at the platform; Associate General Counsel Aaron Ting, who resigned explicitly because of ActBlue's refusal to address these legal risks; and Director of Compliance Eric Hoke, who worked on fraud-prevention issues at ActBlue for well over a decade.

Meanwhile, the evidence indicates that ActBlue retaliated against Legal Counsel Zain Ahmad, the last remaining lawyer on its legal team, for informing the ActBlue Board of Directors and other executives about ActBlue and Wallace-Jones's gross misconduct. The day he blew the whistle, he went on a suspicious leave of absence and was locked out of his email in violation of internal policy by Chief People & Culture Officer Candace King. Even once Ahmad regained email access following a staff outcry, King continued to spy on Ahmad's email using internal security tools to ensure that he could not inform others about ActBlue's potential violations of the law. By this point, alarms were blaring across ActBlue: the ActBlue union wrote the Board of Directors to notify them that ActBlue's legal and compliance functions had been gutted and request an external investigation of ActBlue's conduct.

ActBlue took every step to prevent Congress from finding out about this: Wallace-Jones appears to have made false statements to Congress, ActBlue appears to have withheld documents responsive to a congressional subpoena, and former ActBlue employees invoked their Fifth Amendment right a collective 146 times rather than offer testimony that could help the Committees stamp out foreign money that taints our elections.

The Committees will not be deterred. The Committees have requested additional information about ActBlue's fraud-prevention practices for foreign donations dating back to

¹⁴⁹ Deposition of Alyssa Twomey, Former Vice President of Customer Service, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform at 18 (July 23, 2025).

2020.¹⁵⁰ We will continue to conduct oversight to inform potential legislation to ensure that our elections are safe and secure.

¹⁵⁰ See Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Ms. Regina Wallace-Jones, CEO, ActBlue (Apr. 14, 2026).

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EXHIBIT 1

Darrin Hurwitz Severance Total

GARLV - Garden Leave	120.00	161,718.8	19,406.26			1,358.44		232.88	
								1,734.89	
								5,641.69	
								281.39	
								1,203.19	
						1,358.44		9,094.04	0.00

Total Hours 120.00

19,406.26

Check Printed:

Check Amount: 0.00

Direct Deposit: 8,953.78

Net: 8,953.78

	Employee Number	Per Control	Per Control	Period End Date	Job Code	
Hurwitz, Darrin						
SEVF - Severance Amt		168,187.50				2,018.25
						11,000.38
						37,001.25
						2,443.50
						8,912.89
						61,476.27
						0.00

Total Hours

168,187.50

Check Printed:

Check Amount: 0.00

Direct Deposit: 106,711.23

Net: 106,711.23

EXHIBIT 2

Darrin Hurwitz Separation Agreement

Hi Darrin,

Please review the following information regarding next steps for your departure from ActBlue.

Separation Date & Agreement

Your last working day is November 22, 2024. You will be on paid leave effective November 22, 2024 until December 27, 2024. You will receive your last paycheck on December 27, 2024.

You will have 21 days to review your severance agreement. If you sign and return the agreement by December 13, 2024, you will receive the lump sum severance payment on or around January 3, 2024.

Benefits Information

Your medical, dental, and vision insurance benefits will be maintained and fully paid for by ActBlue for you and any dependents enrolled in the plan(s) for 6 months following your last day of benefits coverage (December 31, 2024) provided that you sign your severance agreement and submit the attached COBRA election form. Note: You must elect COBRA coverage and sign the COBRA document to remain on ActBlue benefits. If you wish to continue COBRA coverage beyond the 6 months, you will be responsible for the full COBRA costs of those insurance benefits, as described in the attached letter.

Life Insurance: please review the following information which outlines your options [Life Insurance Portability & Conversion Brochure](#) or to speak with a [REDACTED], call: [REDACTED]

HRA & FSA: You will have 90 days from your end date, December 27, 2024, to submit claims for reimbursement for services incurred up to your last day. Purchases made after the last day of employment are not eligible for reimbursement. You never lose access to the portal; claims are submitted in the same way through the Voya Portal, email, fax, or mail. **If COBRA is elected for HRA, debit cards will be inactivated and all reimbursements will be manual through the Voya portal.* If you have any questions about your accounts(s), you can contact the [REDACTED] team at [REDACTED] or [REDACTED]

401K: Your 401k benefits are managed by [REDACTED]. Please contact them directly [REDACTED] to learn more about your options.

Outplacement Services

ActBlue is offering up to 6 months of outplacement services via an external partner. This service would begin following your last date of employment. You must elect this service by reaching out to [REDACTED] no later than December 27, 2024.

Unemployment Insurance

While you are not working, you may also be eligible for unemployment benefits through the state of California. Please see the enclosed material on how to access unemployment insurance in your state.

Accessing Employment Records

You will have 12 months from your departure date to access UKG. After that, your access will be removed. If you wish to access UKG in the future for paystubs or to update your address, please use the following to log in:

- Link: [REDACTED]
- User name: [REDACTED]
- Password: [REDACTED]

Equipment Return

A shipping box will be sent to your home address. Please return your laptop within two (2) weeks of receipt of the box.

Please let me know if you have any questions.

Thank you,

Candace King

Contents

1. Separation Agreement and General Release
2. Cobra Letter
3. Cobra Continuation Coverage Election Notice
4. Unemployment Insurance Benefit Notice to Employees

SEPARATION AGREEMENT AND GENERAL RELEASE

This Separation Agreement and General Release ("Agreement") is made by and between Darrin Hurwitz ("Employee") and ActBlue LLC ("ActBlue"), a Massachusetts limited liability corporation.

WHEREAS, the parties desire to reach mutually agreeable terms related to Employee's separation from employment with ActBlue;

NOW, THEREFORE, in exchange for the good and valuable consideration described herein, the receipt of which is hereby acknowledged, Employee and ActBlue agree as follows:

1. Separation from Employment.

(a) Employee's employment with ActBlue shall terminate as of close of business on December 27, 2024 ("Last Day of Employment"). All employee benefits and leave accruals will cease on the Last Day of Employment.

(b) Between the close of business on November 22, 2024 and their Last Day of Employment, Employee shall be on paid vacation leave and shall not perform or have authority to perform any job duties; however, during this time, as Employee will still be considered an ActBlue employee, Employee will still be bound by applicable ActBlue policies and procedures.

(c) Following the Last Day of Employment, Employee will receive information about any rights Employee has to health insurance continuation benefits under the Consolidated Omnibus Budget Reorganization Act of 1985 (COBRA) or any other applicable law.

2. Additional Consideration. If Employee is otherwise in compliance with the terms of this Agreement, ActBlue will:

(a) Pay severance to Employee in the total amount of \$168,187.50, an amount equal to twenty-six (26) weeks of Employee's current salary, which is [REDACTED]. The Severance will be paid to the Employee in a lump sum on or around January 3, 2025. The Severance will be reduced by all deductions and withholdings applicable to payment of compensation and by any outstanding amounts Employee owes ActBlue for expenses, advances, or amounts not incurred in accordance with ActBlue policies. Payments will be directly deposited in Employee's bank account in accordance with Employee's previous instructions to ActBlue.

(b) Provided Employee and any covered spouse, domestic partner, and dependents timely elect to continue group health, vision, and dental insurance coverage under COBRA and to the extent they are eligible for COBRA coverage, pay to continue Employee's and any covered spouse's, domestic partner's, and dependents' COBRA coverage as well as maintain Employee's Health Reimbursement Arrangement (HRA) for twenty-six (26) weeks following the Last Day of Employment. Fully executed COBRA documents will be required for continued coverage.

After that date, if Employee remains eligible under COBRA, Employee may continue group health, vision, and dental insurance coverage at Employee's own expense.

3. Use and Return of Organizational Property and Information.

(a) No later than the Last Day of Employment, Employee agrees to return any and all materials and property, without regard to the format (i.e. hard copy or electronic), related to ActBlue in Employee's possession or control, including but not limited to computer equipment, and all material and information related to finances, campaigns, fundraising, donors, personnel, programs, strategies, business plans, platforms, technology, operations, and communications, and electronic and written files, data, keys, fobs, credit cards, contact lists, and correspondence. Up, and until, the Last Date of Employment, Employee shall be bound by all ActBlue technology policies and shall not misappropriate any ActBlue property. Employee shall not keep any copies (electronic or hard copy) of such materials, property, and information without the express written consent of ActBlue. Employee agrees that, should Employee discover after the Last Day of Employment that Employee possesses or otherwise has custody or control of any property, materials or information of ActBlue, Employee will immediately return such property to ActBlue. No later than the Last Day of Employment, Employee shall submit all outstanding expense reimbursements Employee is seeking, reconcile any charges on Employee's ActBlue credit card, if applicable, and submit all outstanding timesheets.

(b) Subject to the provisions of Paragraph 5(b) and unless otherwise required by applicable law, Employee will continue to abide by Employee's obligations not to use themselves or disclose to others any information regarding ActBlue which is not generally available to the public, including but not limited to information about ActBlue's finances, campaigns, fundraising, donors, personnel, programs, activities, platforms, technology, strategies, operations, and communications, whether past, current, or planned. Notwithstanding the foregoing, notice is hereby provided that, in accordance with the Defend Trade Secrets Act of 2016, Employee is immune from liability and shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret (as that term is defined in the Defend Trade Secrets Act of 2016) that is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney if such disclosure (i) is made solely for the purpose of reporting or investigating a suspected violation of law or (ii) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

4. Release of Claims. As a material inducement to enter into this Agreement, Employee hereby waives, releases and discharges ActBlue, and its successors, assigns, agents, directors, officers, employees, representatives, attorneys, insurers and reinsurers, joint employers, and related entities, and all persons acting by, through, under or in concert with any of them (all of the foregoing are collectively referred to herein as the "Released Parties") from liability for any and all claims which Employee has or may have against any of the Released Parties, known or unknown, which arose at any time up to the date of this Agreement, except for those claims that are not legally waivable by private agreement (such as claims for unemployment or workers compensation insurance). This release includes, without implication of limitation, all claims arising from or attributable to Employee's recruitment, hiring, employment, or termination from employment with ActBlue; all claims of discrimination or retaliation under any federal, state, or

local statute, including but not limited to, the Age Discrimination in Employment Act (ADEA), Title VII of the Civil Rights Act of 1964, the Civil Rights Act of 1991, the Americans with Disabilities Act, as amended, the Equal Pay Act, the Genetic Information Nondiscrimination Act of 2008, and any state or local nondiscrimination or equal pay laws; all claims under the Employee Retirement Income Security Act of 1974, as amended, but excluding claims for vested retirement benefits; all claims under the National Labor Relations Act or state labor laws; all claims under the Worker Adjustment and Retraining Notification Act (WARN) or any similar state or local WARN acts; all waivable claims for family, medical or sick leave under any federal, state, or local statute; all claims of wrongful termination of employment or discharge in violation of public policy; all claims of breach of either express or implied contract, detrimental reliance, promissory estoppel, or tortious interference with contract or economic relations; all claims of defamation, misrepresentation, violation of privacy, emotional distress, fraud, negligence, or personal injury; all waivable claims under any other federal, state or local statute or regulation of any kind, or the common law; and all claims for wages, benefits, medical expenses, paid or unpaid leave, damages, interest and attorneys' fees. The release in this Paragraph 4 is a GENERAL RELEASE and is to be construed in the broadest possible manner consistent with applicable law. Employee specifically agrees that this GENERAL RELEASE extends to claims which Employee does not know or suspect to exist in Employee's favor and which, if Employee did know to exist, would have materially affected this Agreement. The release in this Paragraph 4 does not release any rights or claims that arise after this Agreement is executed, including any claim for breach of this Agreement.

Employee acknowledges and agrees that other than those payments provided for under this Agreement, Employee has no claims for further compensation of any type from ActBlue. Employee represents that as of the date of signing this Agreement, Employee has received all sick, family, and medical leave that might be due Employee under applicable law, is not suffering from a work-related injury, and has not failed to report a work-related injury to ActBlue.

5. No Actions or Claims.

(a) Employee represents that Employee has no charges, complaints, grievances, arbitrations, lawsuits, or claims against ActBlue filed or pending with any local, state or federal agency, union, or court as of the date of execution of this Agreement and that Employee will not file any such charge, complaint, grievance, arbitration, lawsuit, or claim at any time hereafter, based upon events occurring prior to the date of execution of this Agreement, except as provided in Paragraph 5(b) below. In the event any agency or court ever assumes jurisdiction of any such lawsuit, claim, charge, grievance, arbitration, or complaint, or purports to bring any legal proceeding on Employee's behalf, Employee will ask any such agency or court to withdraw from and/or dismiss any such action, grievance, or arbitration, with prejudice.

(b) Employee agrees never to file a lawsuit, claim, cause of action, administrative proceeding, or agency action against Released Parties seeking damages, reinstatement, benefits, attorneys' fees, or other personal relief based upon the claims being released by Employee in this Agreement. However, Employee understands that Employee retains any right that cannot be waived by law to file administrative charges or complaints with government agencies regarding Released Parties. Nothing in this Agreement, including but not limited to the provisions of

paragraph 3(b) and 6, is intended to, or shall, interfere with any nonwaivable rights Employee has under applicable laws to participate in a proceeding with any appropriate federal, state, or local government agency enforcing discrimination, labor, workplace safety, or whistleblower laws, including the Equal Employment Opportunity Commission (EEOC), the National Labor Relations Board (NLRB), the Occupational Safety and Health Administration (OSHA), the Securities and Exchange Commission (SEC), or any other federal, state or local governmental agency or commission (Government Agencies), or to cooperate with any such agency in its investigation, including providing documents or other information, without notice to ActBlue. This Agreement does not limit Employee's right to receive an award for information provided to any Government Agencies.

(c) **Civil Code of the State of California §1542.** Employee expressly waives all rights under Section 1542 of the Civil Code of the State of California, which reads as follows:

“A general release does not extend to claims which the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.”

Notwithstanding the provisions of Section 1542, and for the purpose of implementing a full and complete release and discharge of each and all of the Releases, Employee expressly acknowledges that this Agreement is intended to include and does include in its effect, without limitation, all claims which Employee does not know or suspect to exist in Employee's favor at the time Employee signed this Agreement and that this Agreement contemplates the extinguishment of all such claims.

(d) There is a good faith dispute between the parties as to whether Employee is owed any additional payments, including but not limited to wages, commissions, bonuses, vacation, sick leave, holidays, reimbursements, benefits, and/or penalties, except for the Severance expressly set forth in Section 2(a) above, and Employee is willing to compromise and resolve all such claims by accepting the Severance under the terms of this Agreement.

6. Confidentiality and Non-Disparagement.

(a) ActBlue and Employee agree to maintain the confidentiality of all terms of this Agreement and the discussions leading to it, except as set forth in Paragraph 5(b), and except that either ActBlue or Employee may make disclosure to its/their attorneys, financial advisers, as required by federal, state or local taxing agencies, and as otherwise compelled by law. Employee may also make disclosure to Employee's immediate family members (each of whom must first agree to maintain strict confidentiality concerning this Agreement). ActBlue may further make disclosure to its directors and officers and to responsible employees as reasonably necessary to address the operations of the organization or to implement the terms of this Agreement. Nothing in this section shall prohibit Employee from making disclosures allowed under Government Code 12964.5 or Code of Civil Procedure 1001.

(b) Subject to the provisions of Paragraph 5(b), Employee agrees not to make any disparaging or defamatory statements or comments about ActBlue or its programs, activities,

board members, officers, and employees. ActBlue agrees to instruct Regina Wallace Jones, as ActBlue's President & CEO, not to make any disparaging or defamatory statements or comments about Employee. ActBlue may provide truthful information in response to a subpoena, in response to any inquiry by a government or regulatory agency such as an unemployment insurance agency, or when otherwise compelled by law.

7. **Acknowledgments Regarding Agreement.** Employee acknowledges and declares that the following statements are true and correct and in compliance with the Older Workers Benefits Protection Act:

(a) This Agreement is written in a manner that I can and do understand. I have carefully reviewed this Agreement, understand all of its terms and consequences, and have entered into it freely, knowingly, and voluntarily.

(b) I understand that this Agreement specifically waives all discrimination claims against ActBlue, including those under the ADEA, as well as those other claims arising under any other statutes, regulations, contracts, or common law as referenced in Paragraph 4, that arose at any time before the execution of this Agreement.

(c) I understand that this Agreement does not waive rights or claims based on events occurring after the signing of this Agreement, but that it does include the future consequences of events that occurred before the execution of this Agreement.

(d) I understand that my release and waiver of rights and claims in this Agreement is made in exchange for monetary payments and other value that are in addition to what I would otherwise be entitled to.

(e) I have been advised by ActBlue that I have the right to consult with an attorney prior to signing this Agreement.

(f) I have been given a period of at least 21 days in which to consider this Agreement prior to signing it. I understand that if I have not signed and returned this Agreement to ActBlue by close of business on December 13, 2024, the offer contained in this Agreement is withdrawn and I will not receive the additional consideration set forth in this Agreement. I agree that any changes made in the Agreement, whether material or not, do not restart the running of the 21-day period. In the event that I sign this Agreement within less than 21 days of the date of its delivery, I acknowledge that such decision was entirely voluntary and that I had the opportunity to consider this Agreement for the entire 21-day period.

(g) I understand that for seven (7) days following execution of the Agreement by both parties, I may revoke my agreement to the above terms. Any revocation must be in writing and be sent via email to [REDACTED]

8. **Non-Admission of Liability.** The parties mutually understand and agree that this Agreement and the actions taken pursuant to this Agreement are not to be understood or construed as an admission of wrongdoing or liability on the part of ActBlue, Employee, or any other person or entity.

9. **Breach.** Employee understands and agrees that, in the event Employee breaches the provisions of Paragraphs 3 or 6, the harm to ActBlue will be substantial, but impossible to quantify, and, accordingly, Employee understands and agrees that, in the event Employee breaches the provisions of Paragraphs 3 or 6, ActBlue shall be entitled to withhold or recover all

but \$100.00 of the consideration paid or payable to Employee under Paragraph 2, which Employee agrees shall constitute sufficient and adequate consideration for Employee's promises in the Agreement, including without limitation Employee's undertakings pursuant to Paragraph 4. In addition, ActBlue shall be entitled to any other remedies available under law, including, but not limited to, an immediate injunction in a court of competent jurisdiction to specifically enforce this Agreement without the need to prove irreparable harm and without the necessity of placing a bond for such preliminary injunction.

10. **Responsibility for Payment of Taxes.** Employee acknowledges and agrees that ActBlue has not made any representations or warranties regarding the tax consequences of any amounts paid pursuant to this Agreement. Employee is solely responsible for its own tax reporting obligations and agrees to pay all local, state and federal income taxes, penalties, interest, fines or other assessment incurred or owed by Employee, if any, in connection with the Severance or this Agreement. Employee agrees to indemnify and hold harmless ActBlue against any liabilities, assessment of taxes, penalties, interests, fines, costs and expenses, including attorneys' fees, arising out of the Severance or this Agreement.

11. **Future Cooperation.** Upon reasonable notice, Employee agrees to cooperate with ActBlue and its legal counsel in connection with any current or future investigation or litigation relating to any matter with which Employee was involved or of which Employee has knowledge.

12. **No Reliance.** The parties represent and acknowledge in executing this Agreement that they do not rely nor have they relied upon any representation, statement, promise, or inducement made by the other party or their agents or representatives with regard to the subject matter, basis, terms or effects of this Agreement, other than those contained herein.

13. **Modification, Waiver, Entire Agreement.** This Agreement can be amended only in writing and by mutual consent of Employee and ActBlue. No waiver of any provision of this Agreement shall be valid unless in writing and signed by the party against whom it is sought to be enforced. This Agreement constitutes the entire agreement related to the parties' settlement and release of claims, and there are no other agreements, oral or written, which supersede or control this document.

14. **Severability.** Should any provision of this Agreement except the release of claims be found to be void or unenforceable by a court of competent jurisdiction, that determination will not affect the remainder of this Agreement. In addition, any such provision may be reformed by a court of competent jurisdiction so that it is enforceable to the maximum extent permitted by law, and the parties agree to abide by such determination.

15. **Successors.** This Agreement shall be binding on and inure to the benefit of the parties and their respective heirs, employees, subsidiaries, affiliates, agents, attorneys, representatives, successors, and assigns.

16. **Governing Law.** This Agreement shall be governed, without regard to any conflict of laws principles, by the laws of Massachusetts.

17. **Effective Date.** This Agreement will not be effective until the eighth day after it is fully executed by both parties, provided Employee does not revoke the Agreement as allowed in Paragraph 6(g). This date shall be considered the “Effective Date” of the Agreement.

18. **Execution.** This Agreement may be executed in counterparts, each of which shall be deemed an original. This Agreement may be executed via DocuSign or any other electronic signature method, by facsimile signatures, or by signatures that are scanned and transmitted by e-mail.

IN WITNESS WHEREOF, the parties have caused this Separation Agreement and General Release to be signed on the dates indicated below.

Darrin Hurwitz

Date: _____

ActBlue LLC
By: Candace King, Head of People & Culture

Date: _____

EXHIBIT 3

Internal ActBlue Employee Messages (Feb. 21,
2025)

Short Message Report

Conversations: 1	Participants: 3
Total Messages: 22	Date Range: 2/21/2025

Outline of Conversations

 [REDACTED] [REDACTED] [REDACTED] [REDACTED] • 22 messages on 2/21/2025 • [REDACTED] • [REDACTED]

Messages in chronological order (times are shown in GMT +00:00)

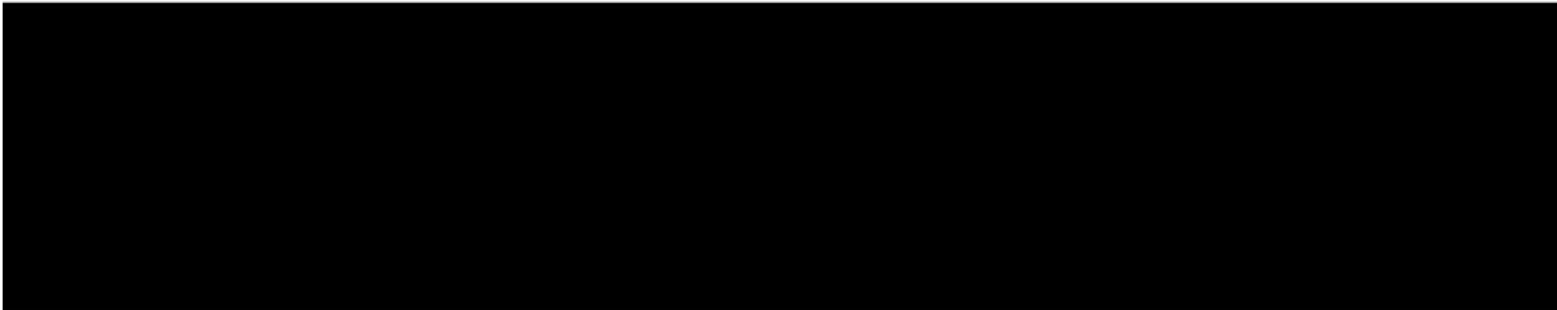


[REDACTED]



> [REDACTED] [REDACTED]
I do not think Aaron, Peter, Alyssa were asked - I think it's their choice and they are unhappy

2/21/2025, 3:26 PM



> [REDACTED] [REDACTED]
I do know that Aaron was asked to permanently head L&C and instead of accepting he gave his notice

2/21/2025, 3:27 PM

> [REDACTED] [REDACTED]
ooof, no in between option?

2/21/2025, 3:27 PM

> [REDACTED] [REDACTED]
I think he's been really unhappy with what he's seen while being in the interim role

2/21/2025, 3:28 PM

> [REDACTED] [REDACTED]
ahhhh makes sense

2/21/2025, 3:28 PM

EXHIBIT 4

Internal Messages between Aaron Ting and
Candace King (Feb. 14, 2025)

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 4	Date Range: 2/14/2025

Outline of Conversations



██████████ • 4 messages on 2/14/2025 • Aaron Ting • Candace King

Messages in chronological order (times are shown in GMT +00:00)

-  
- AT Aaron Ting 2/14/2025, 10:14 PM
Hey friend -- I just met with Regina to let her know that I've decided to leave ActBlue at the end of the month for a new opportunity. I wanted to reach out and make sure you and other ELT members know as well. I've loved working with you and I'm happy to hop on a call later to chat if you have any questions.
- > CK Candace King 2/14/2025, 10:51 PM
Hi Aaron, thanks for letting me know. This is disappointing news! End of the month is fast approaching so should we schedule time on Tuesday to discuss transition logistics?
- > AT Aaron Ting 2/14/2025, 10:55 PM
Yes! And I already have a staffing plan that I walked through on a call with Regina to make sure no plates are dropped.
- > CK Candace King 2/14/2025, 10:56 PM
ohh great! thank you for that. i'll find us a quick 30 min then.
"Aaron Ting" reacted with "raised_hands"

EXHIBIT 5

Internal ActBlue Employee Messages (Feb. 18,
2025)

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 29	Date Range: 2/18/2025

Outline of Conversations



██████████ • 29 messages on 2/18/2025 • ██████████ • ██████████

Messages in chronological order (times are shown in GMT +00:00)



[REDACTED]

[REDACTED]

> [REDACTED] 2/18/2025, 5:07 PM
FYI the only resignation I know of is Aaron that resigned Friday I don't have an end date

> [REDACTED] 2/18/2025, 5:09 PM
oof gotcha

> [REDACTED] 2/18/2025, 5:09 PM
yeah exactly

[REDACTED]

> [REDACTED] 2/18/2025, 5:10 PM
He resigned to Regina, not sure who else knows and I don't know what other resignations they are talking about

[REDACTED]

- [REDACTED]
- > [REDACTED] 2/18/2025, 5:29 PM
Candace just told me he leaves next week so fast timing for Aaron
- > [REDACTED] 2/18/2025, 5:30 PM
woooof
- > [REDACTED] 2/18/2025, 5:30 PM
not surprising but man this is all bad timing lol
- > [REDACTED] 2/18/2025, 5:32 PM
Yes Im not surprised but frankly it feels like the middle finger to us, why would he get on stage at the all staff as an interim and then quit when he knew he would do that before the all staff and he had been saying he would help us hire the permanent person.... I don't know him at all and dont want to be unfair but not how I would expect someone at that level to handle their departure but I have no clue how he was feeling
- > [REDACTED] 2/18/2025, 5:33 PM
Yeah - I've always had a really favorable impression of him, but I guess he was more fed up that we realized.
- > [REDACTED] 2/18/2025, 5:34 PM
Yeah based on how he acted seems like it
- [REDACTED]

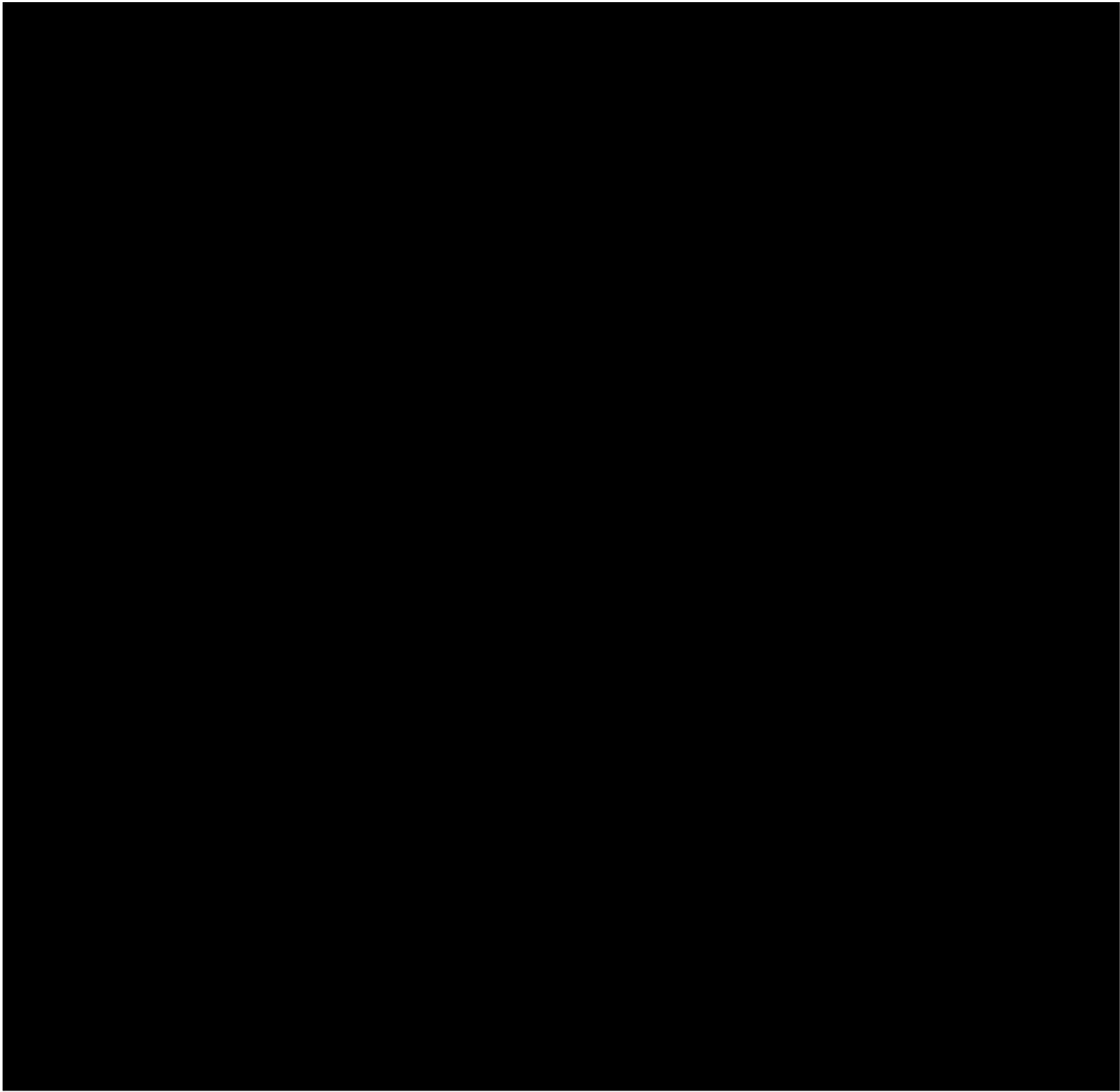


EXHIBIT 6

Email from ActBlue HR Employee to Regina
Wallace-Jones (Feb. 26, 2025, 5:01 PM)

From: [REDACTED]
Sent: 2/26/2025 5:01:29 PM
To: [REDACTED]@actblue.com
Subject: Zain Ahmad Leave of Absence Request Received

Hello Regina Wallace-Jones,

We received a Leave of Absence request for your direct report, Zain Ahmad, and it is in process. We'll notify you once it's approved.

We want to keep you informed about the process for employees taking leaves longer than 30 days. During this time, your team member's access to most internal systems will be temporarily restricted. However, they will maintain access to essential tools, specifically email, Slack, UKG, and Confluence.

Here's what we've shared with your team member to ensure a smooth transition:

Update key document access: They've been advised to ensure that important files and systems are accessible to you and the team before their leave begins.

Out of Office Planning: We've provided them with our ActBlue Out of Office Template for additional guidance.

Manager access to GSuite: If needed for business continuity, your team member can request IT to grant you access to their GSuite.

If you need any support or additional guidance for leave planning, feel free to reach out to your People Business Partner.



[REDACTED]
(she/her/hers)
P&C Operations Analyst | ActBlue
secure.actblue.com

EXHIBIT 7

Email from ActBlue HR Employee to Zain Ahmad
(Feb. 25, 2025, 5:26 PM)

From: [REDACTED]
on behalf of [REDACTED]
Sent: 2/25/2025 5:26:07 PM
To: [REDACTED]@actblue.com
Subject: PNC-163 Medical Leave

Reply above this line.

Hi there, thanks for contacting **People & Culture!** We have received your request and will get back to you soon.
In the meantime, please check out our [Confluence space](#). The space includes information on [benefits](#), [P&C FAQs](#), [Payroll FAQs](#), and more.

[View request](#) · [Turn off this request's notifications](#)

This is shared with Zain Ahmad.

Powered by [REDACTED]

EXHIBIT 8

Email from ActBlue HR Employee to Zain Ahmad
(Feb. 25, 2025, 6:10 PM)

From: [REDACTED]
on behalf of [REDACTED]
Sent: 2/25/2025 6:10:53 PM
To: [REDACTED]@actblue.com
Subject: PNC-163 Medical Leave

Reply above this line.

[REDACTED] commented:

Thank you, Zain. [REDACTED] will work with you directly throughout your leave.

[REDACTED] resolved this as Done.

[View request](#) · [Turn off this request's notifications](#)

This is shared with Zain Ahmad.

Powered by [REDACTED]

EXHIBIT 9

Internal Message from ActBlue Employee to
Candace King (Feb. 26, 2025, 11:46 PM)

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 1	Date Range: 2/26/2025

Outline of Conversations



• 1 message on 2/26/2025 • Candace King •

Messages in chronological order (times are shown in GMT +00:00)



[Redacted]



[Redacted]

2/26/2025, 11:46 PM

Candace, this whole situation is sad—avoidable and preventable, especially with so much important work to do. People are outraged about a lot of things -- the deleted Slack messages are shameful.

To clarify: Zain needed email access to complete his leave paperwork. If the new stance is that this has always been the policy, it's inconsistent. The leave program team wasn't informed his access would be revoked, and historically, this hasn't been the standard practice (we have the receipts). This puts good people in difficult positions. Frankly, this looks like blatant retaliation, and people are noticing. Deleted messages are circulating, staff are reaching out to me for answers, and I haven't heard from you all week.

[Redacted]

EXHIBIT 10

Internal Messages between ActBlue Employee and
Candace King (Feb. 27, 2025)

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 27	Date Range: 2/27/2025

Outline of Conversations



██████████ • 27 messages on 2/27/2025 • Candace King • ██████████

Messages in chronological order (times are shown in GMT +00:00)

 [REDACTED]

CK Candace King 2/27/2025, 12:26 AM
Hi [REDACTED] can you please reinstate the critical functions email, confluence, etc per the policy? I'm sorry for all of the friction this caused you today.

> CK Candace King 2/27/2025, 12:26 AM
for Zain i mean

> [REDACTED] 2/27/2025, 12:28 AM
Hey, sorry for you too - I've never seen anything like this

> [REDACTED] 2/27/2025, 12:28 AM
email, confluence, slack and ukg?

> CK Candace King 2/27/2025, 12:28 AM
yes please.

> [REDACTED] 2/27/2025, 12:28 AM
ok on it

[REDACTED]

> CK Candace King 2/27/2025, 12:34 AM
let me get through Zain first. i'll reply to him once he's reinstated.

> [REDACTED] 2/27/2025, 12:36 AM
I am worried about how he'll behave with these accounts when he gets back in, honestly

> CK Candace King 2/27/2025, 12:36 AM
i still want access to his emails though. is that possible?

> [REDACTED] 2/27/2025, 12:36 AM
Only if you have delegate email access and he'd see that

> CK Candace King 2/27/2025, 12:36 AM
i am too so we need to monitor it and if there is a conduct concern, we will address it

> [REDACTED] 2/27/2025, 12:38 AM
We have sec tooling that can monitor behavior

> [REDACTED] 2/27/2025, 12:38 AM
mass download, messages meant to harass, etc

> CK Candace King 2/27/2025, 12:38 AM
ok great! then can we key in on him there?

> [REDACTED] 2/27/2025, 12:38 AM
yup

> [REDACTED] 2/27/2025, 12:46 AM
His access is all set - I reset his password so he'll need help getting back in. I'm going to reach out to his personal email and see if he needs help

> [REDACTED] 2/27/2025, 12:46 AM
Unless you want to follow up? Up to you

> CK Candace King 2/27/2025, 12:49 AM
you can reach out. i need to respond to an email he sent regarding this matter but I'll also share that you're reaching out to assist via his personal email.

> [REDACTED] 2/27/2025, 12:50 AM
ok - thanks

> CK Candace King 2/27/2025, 1:00 AM
done!

> CK Candace King 2/27/2025, 1:53 AM
sorry to bother again [REDACTED] were you able to reach Zain to assist with his password reset?

> CK Candace King 2/27/2025, 1:53 AM
checking on you to see if it went ok for you

> [REDACTED] 2/27/2025, 2:09 AM
He didn't respond to me

> CK Candace King 2/27/2025, 2:11 AM
ok. again, i'm sorry [REDACTED] for today, period.

[REDACTED]

EXHIBIT 11

Internal ActBlue Employee Messages (Feb. 28,
2025)

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 6	Date Range: 2/28/2025

Outline of Conversations

	6 messages on 2/28/2025
---	------------------------------------

Messages in chronological order (times are shown in GMT +00:00)



[Redacted]

Also in case you are not aware yet, Eric Hoke either quit last night or was fired. So. There's that.

[Redacted]

2/28/2025, 1:56 PM

And I didn't know about Eric - that is terrible.

[Redacted]

EXHIBIT 12

Internal ActBlue Employee Messages (Feb. 28,
2025)

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 29	Date Range: 2/28/2025

Outline of Conversations

	 29 messages on 2/28/2025 *  * 
---	---

Messages in chronological order (times are shown in GMT +00:00)



D7VU0EDC5



> [REDACTED] 2/28/2025, 7:23 PM
How are you doing with everything?

> [REDACTED] 2/28/2025, 7:24 PM
wow, it's a lot to take in! I do have a couple questions, if you're able to answer?

> [REDACTED] 2/28/2025, 7:25 PM
I know what Zain posted in the IT channel, but I don't know what [REDACTED]'s message was- is that something you could share with me, even just a recap would be helpful. and when Candace mentioned a message from last night, I wasn't sure if she meant [REDACTED]'s message from Wednesday night, or was there something else that happened last night? was that from the unions?

> [REDACTED] 2/28/2025, 7:25 PM
I can also ask [REDACTED] if that's better. I appreciate you all being open

> [REDACTED] 2/28/2025, 7:36 PM
no worries dude - so after Zain saw messages being deleted from the IT channel (which was never something anyone instructed anyone to do - we still don't know who was doing that) he moved to a channel that's for HR/IT collaboration - usually used for onboarding/offboarding logistics. There are about 18 people in that channel including a bunch of P&Cers as you can imagine. He was expressing concerns that we were violating policy around his leave of absence and was particularly escalated by his messages being removed - saying it was retaliatory. [REDACTED]
[REDACTED]

[REDACTED]

> [REDACTED] 2/28/2025, 7:38 PM
To be clear - no retaliation was intended and I've been told repeatedly that no one instructed for messages to be deleted. So the whole thing escalated due to some weird assumptions and miscommunication. And like Candace said - part of that was because she had taken over as PBP for L&C and was working with IT directly to shut off the right amount of access for his leave. And the lack of visibility for [REDACTED] I guess alarmed her to such a degree that she reacted that way.

> [REDACTED] 2/28/2025, 7:39 PM
I definitely still don't know what to make of her assuming the worst in that moment and I also am super blurry on the broader context of everything going on. But I am confident that in that specific situation - there was no shady intent at all

> [REDACTED] 2/28/2025, 7:39 PM
So just a super unfortunate result of a couple miscommunications.

> [REDACTED] 2/28/2025, 7:39 PM
I don't know as much about the message last night folks were referring to. I'm assuming it was the message to the board from the union after their meeting. But I haven't seen that.

> [REDACTED] 2/28/2025, 7:39 PM
[REDACTED] may have. Feel free to ask her about it.

> [REDACTED] 2/28/2025, 7:41 PM
Overall my current vibe is very much wait and see. I'm glad that there's going to be someone external looking into all of this and I'm gonna be ready for whatever comes form that, but try not to jump the gun or be too reactive based on assumptions.
[REDACTED] reacted with "blue_heart"

> [REDACTED] 2/28/2025, 8:33 PM
This is was very helpful info, thank you so much!

> [REDACTED] 2/28/2025, 8:34 PM
I really do appreciate the leads being willing to answer questions and talk about this stuff

> [REDACTED] 2/28/2025, 8:35 PM
Of course. It's hard cuz like we barely know anything either. And even the ELT don't know everything. I get the sense this is all less anyone hiding anything and more just that a few too many people are clueless.
[REDACTED] reacted with "+1"

> [REDACTED] 2/28/2025, 8:36 PM
So much going on!

> [REDACTED] 2/28/2025, 8:36 PM
I assume Eric leaving is related to all of this?

> [REDACTED] 2/28/2025, 8:37 PM
I also have to assume that but I haven't talked to him at all.

> [REDACTED] 2/28/2025, 8:38 PM
I also feel like he was in a position where I think he was mostly staying cuz it was comfortable here. It wouldn't surprise me if he just decided he was done as soon as it became an unstable situation. I mean like maybe he knew something and decided to go? But I could see it also just being more than he wanted to deal with.

> [REDACTED] 2/28/2025, 8:38 PM
Have you talked to him?

> [REDACTED] 2/28/2025, 8:40 PM
I haven't, but I've thought same thing about him! It would make sense with the whole department falling apart

> [REDACTED] 2/28/2025, 8:40 PM
Also my thumbs up above is a millennial thumbs up, I truly mean it as ok, no sarcasm 🙄 😊 🙄 😊

> [REDACTED] 2/28/2025, 8:41 PM
Hahaha I know.

> [REDACTED] 2/28/2025, 8:41 PM
That's so funny

> [REDACTED] 2/28/2025, 8:41 PM
Young people today! 🙄 😊

> [REDACTED] 2/28/2025, 8:41 PM
Literallyyyyy

EXHIBIT 13

ActBlue Legal & Compliance Operations Specialist
Resignation Letter (Mar. 4, 2025)

Mar 4, 2025

ActBlue
PO Box 962017
Boston, MA 02196

Dear [REDACTED],

I would like to inform you of my intention to resign from Legal and Compliance Operations Specialist at ActBlue.

My last day will be April 6, 2025. It is my intention to give ActBlue the most time possible to plan for this change; I will be fully available through my last day, and will assist in any and all transitional work during this period.

I appreciate the opportunities in my tenure here. I wish you and the company the very best going forward.

Sincerely,

[REDACTED]

EXHIBIT 14

Email from ActBlue Union to ActBlue Board (Feb.
27, 2025)

From: Candace King [REDACTED]@actblue.com]
on behalf of Candace King [REDACTED]@actblue.com> [REDACTED]@actblue.com]
Sent: 3/5/2025 8:58:03 PM
To: [REDACTED]
Subject: Fwd: ActBlue Union and ActBlue Tech Workers Union Letter to the Board

FYI

Candace

----- Forwarded message -----

From: [REDACTED]
Date: Sun, Mar 2, 2025 at 12:00 PM
Subject: Re: ActBlue Union and ActBlue Tech Workers Union Letter to the Board
To: ActBlue Union [REDACTED]
Cc: [REDACTED]
[REDACTED]

To whom it may concern:

On behalf of the Board of Directors, I am confirming receipt of your messages below. The Board is convening this Wednesday, March 5th and Thursday, March 6th to discuss this and other Board business.

Regards,

[REDACTED]
[REDACTED]
Board Chair
ActBlue

On Fri, Feb 28, 2025 at 7:22 PM ActBlue Union [REDACTED] wrote:
As of today, another critical leader has departed from the organization:

- Eric Hoke, Compliance Director, 12 year 9 month tenure, departed 02/27/2025 (effective immediately)

In addition to significant losses to our in-house legal function, Eric's departure means that our internal compliance function is now substantially weakened, with only one person (his former direct report) remaining on staff. Compliance is critical to our day-to-day operations.

[REDACTED]

[REDACTED]

[REDACTED] As members of the Board who have a fiduciary duty to the organization, we implore you to act immediately and include Eric Hoke in the investigatory activities to be conducted by outside independent counsel per our original communication yesterday, February 27th.

Please confirm receipt of this message and our previous message by 5:00 pm Eastern on Monday, March 3rd.

Signed,
ActBlue Tech Workers Union (ABTWU) and ActBlue Union (AB1U)

On Thu, Feb 27, 2025 at 7:38 PM ActBlue Union [REDACTED] wrote:

As staff from across ActBlue, we feel compelled to share our serious concerns about the state of the organization. Over the last two years, we've navigated nearly constant turnover in leadership positions. The dramatic uptick in the last few weeks has indicated an alarming pattern, making it difficult for us to do our work and eroding our confidence in the stability of the organization. In the last few months alone, we've seen the departure of the following leaders:

- Darrin Hurwitz, General Counsel, 1 year 6 month tenure, departed 11/22/2024
- Alyssa Twomey, VP of Customer Service, 14 year tenure, departed 02/21/2025

- [REDACTED]
- Aaron Ting, Associate General Counsel, 15 month tenure, departed 2/24/2025 (five days prior to originally planned departure date)
- [REDACTED]

In the hyper-partisan, tenuous political climate we find ourselves in today, the organization is under increasing scrutiny and is the target of bad-faith political attacks at the hands of ill-intentioned operators. With this context, we are particularly concerned about the departure of leaders who focused on legal and compliance work. Those of us who work with our legal team in our day-to-day do not have clear direction on how to proceed with our work in their absence. We have not received information from the Executive Leadership Team about who will step into these roles or who will lead the defense of our work in the months since Darrin's departure.

Furthermore, in an incredibly alarming development this week, our only remaining Legal Counsel on staff posted in a Slack channel and alluded to possible violations of our Time Off and Leave Policy, Non-Retaliation Policy, and Whistleblower Protection Policy. Their messages were swiftly deleted from the channel without acknowledgement. We find this deeply unsettling and disturbing, and part of a growing pattern of volatility and toxicity stemming from current leadership.

In the wake of all of these high-level departures — and amidst additional drastic changes across the organization — we have been expected to navigate the prolonged vacancy of all of these roles and the lack of clear plans from leadership moving forward. Simultaneously, we are being held to increasingly punitive standards for our work, which has contributed to a demoralizing and distrustful work environment, rather than one that is healthy and collaborative.

As the workers who are crucial to the organization's continued success, and as people with a fundamental interest in seeing ActBlue remain a reliable and trusted platform, we ask the board urgently take the following steps:

- Retain independent outside counsel
- Utilize that independent outside counsel to conduct exit interviews of all of the above leaders and others who have left ActBlue in recent weeks
- Utilize that independent outside counsel to take other investigatory actions to better understand the current state of the organization and evaluate if our CEO is doing her job in an appropriate, competent, and responsible manner
- Take corrective actions based on the findings

Signed,
ActBlue Tech Workers Union (ABTWU) and ActBlue Union (AB1U)

EXHIBIT 15

ActBlue internal memorandum, *Model Governance
Committee/Trust & Safety Team Proposal*

Model Governance Committee/Trust & Safety Team Proposal

Introduction

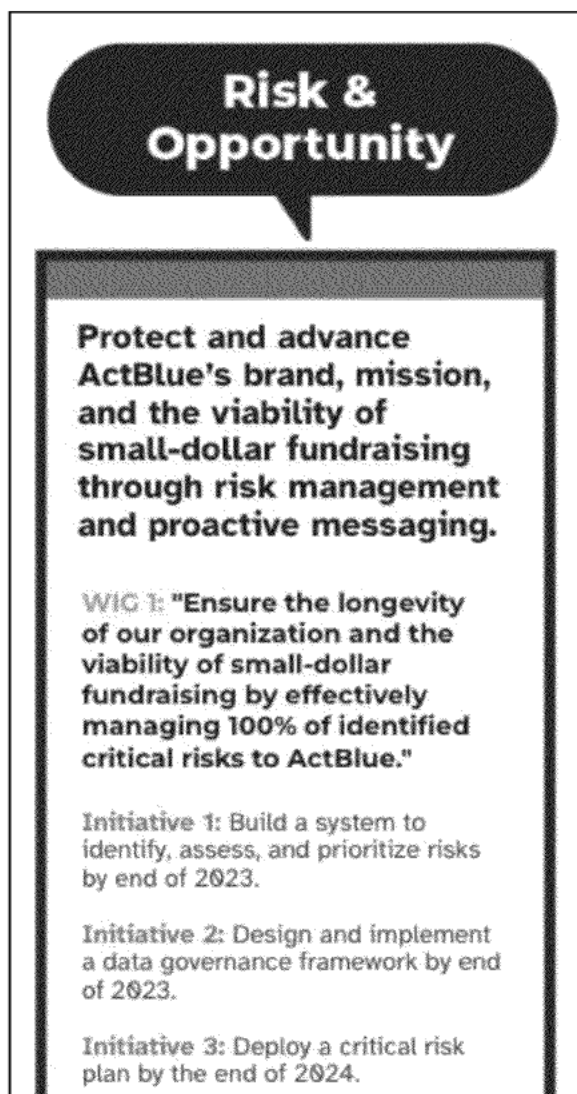
For an excellent summary of the reasons for having a Trust & Safety team at an organization, see this writeup by Persona: [REDACTED]

As our organization grows, we will experience more and more challenges to our Fraud Prevention strategy. In order to respond to those challenges, we need to be able to move quickly and make decisions that impact many departments. In our current iteration, the various departments that need to weigh in on any given decision when a fraud situation occurs are siloed, leaving gaps that can be exploited by fraudsters, leave donors/admins without an answer for longer when we experience an issue, and leaves changes to our payments/fraud model to be made with less oversight.

Purpose

The purpose of this document is to propose a cross-departmental team that could provide consistency in our Trust & Safety decision-making. It will outline which stakeholders should be included in the team, propose a structure for the team, and explain how decisions will be made. With the 2024 election season coming to a close, we must prepare ourselves to make more informed decisions about our fraud prevention/payments approach in the years to come.

Scope



Forming this team will help ActBlue accomplish several aspects of the Risk & Opportunity pillar of the 2023-2024 Operational Plan.

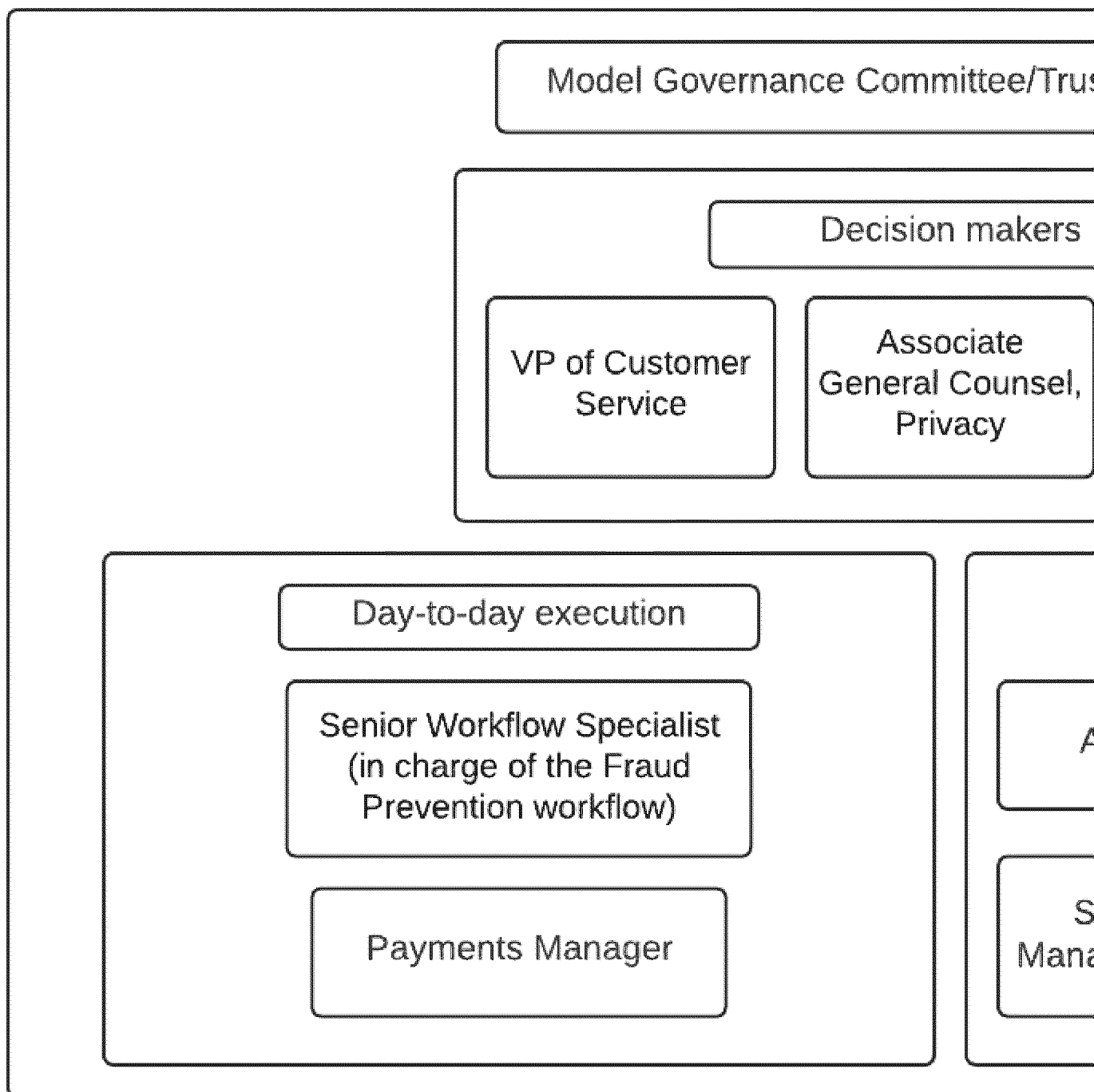
In all ways, forming this team will help ActBlue achieve its mission of servicing donors and groups more effectively while also minimizing their, and our, exposure to risk. The benefits are both explicitly monetarily through things like lower chargeback rates but more broadly like better brand name and meeting the moment of increased political scrutiny.

Stakeholders

This is a list of roles that should be part of the team, notes as to why they should be included, and the name of the person that currently occupies the role. The person in that role will be responsible for representing the opinion of their team, and should do the due diligence of soliciting feedback from people outside of the team when needed.

	Notes	Current Employee
(in charge of workflow)	Oversees the execution of the Fraud Prevention workflow on a day-to-day basis, and currently proposes changes to rules/policies	[REDACTED]
	Oversees the department in which at least two other stakeholders live, and makes key decisions that can affect donors and admins	Alyssa Twomey
	Expert on the Payments flow, and can pursue refunds outside of Indigo	[REDACTED]
	Key figure in AUP flow, and looks into entities/admins of concern	[REDACTED]
Privacy	Provides legal oversight for decisions about fraud	Aaron Ting
or	Provides direction on how to communicate with external individuals when needed	[REDACTED]
curity	Provides a site security perspective	[REDACTED]
Payments	Provides a technical payments perspective	[REDACTED]
	Provides perspective for the team which handles execution of donor-facing decisions	[REDACTED]

Structure



The structure I am proposing for the MGC/T&ST has three subsections, with different roles and responsibilities for each. The day-to-day execution team will handle all tasks that do not require input from the full group and execute on any decisions made by the group (e.g. deploying changes to Sift's rules). When larger/more impactful decisions

need to be made, the advisory team will be asked to weigh in, and the decision makers will reach a consensus on steps to take.

Please note that this proposed structure does not require any changes to existing team structures. This group exists akin to AUP or ELT: a collection of people on multiple teams that work towards a common goal.

Roles and Responsibilities

The team will oversee all aspects of the fraud prevention workflow and the payments team as it relates to fraud prevention. Most of these aspects will run daily without need for full MGC/T&ST input. For example: technically, the scheduling of DS Associates to clear Sift manual review queues falls under the purview of this group, but would be executed by the Senior Workflow Specialist (in charge of the Fraud Prevention workflow) without checking with the other members.

In a similar way, adjustment proposals to workflow rules *will* involve the entire committee, but will be accomplished asynchronously. The most frequent involvement of the full team will be in approving changes made to our Sift (or any future fraud prevention provider) model.

Expectations for Team Members

Members of this team are expected to participate in discussions and fulfill their responsibilities in a timely manner. Weighing in when prompted will help the day-to-day execution team complete their important work.

The group will gather at minimum once per quarter to discuss the strengths, weaknesses, opportunities, and threats to the fraud model. They will meet more frequently on an as needed basis, with the meeting facilitated by the Senior Workflow Specialist in charge of Fraud Prevention.

An example of a situation where the full team would be engaged via a meeting would be in the situation that occurred recently which left us needing to make decisions around

how we handle hacked Express profile accounts used to commit fraud. That decision affects multiple departments and requires the input a team like this would provide.

Requirements to Succeed

- Slack channel (proposed name: xteam-trustandsafety)
- Email group
- Standing quarterly meeting

Timeline

Q3 2024: Initial proposal

Q4 2024: Stakeholders review proposal and weigh in

Q4 2024: Make updates to proposal

Q4 2024: Second revisions

Q1 2025: Go-live

Q2 2025: Review success of team

EXHIBIT 16

Email from Aaron Ting to ActBlue Employees (Feb.
24, 2025, 8:18 AM)

From: [REDACTED]
on behalf of [REDACTED]
Sent: 2/24/2025 2:11:21 PM
To: Aaron Ting ([REDACTED]@actblue.com)
Subject: Re: Leaving ActBlue

Hi Aaron,

I'm sad to see you go, but excited that you are onto a new adventure. It has been a pleasure working with you.

[REDACTED]

On Mon, Feb 24, 2025 at 8:18 AM Aaron Ting [REDACTED] wrote:

Hi friends,

I'm reaching out to let you know that I'm leaving ActBlue today and embarking on a new adventure. It's been an absolute privilege to serve as your in-house counsel, and I wanted to leave you with a few reflections.

First, I've been reminded that those who depart must entrust their aspirations for this organization to those who remain. So I hope you'll begin each workday with humble respect for the opportunity and responsibility of advancing this organization's important mission.

Every day, people all over the country—driven by anger, sadness, or fear—turn to ActBlue in search of hope. By pressing the Donate button, they're using our technology to stand by their belief in a better tomorrow. They need ActBlue's support and empowerment.

They also need its integrity. Our users depend on you to continue being a principled team of diverse professionals—one that recognizes the stakes of the decisions you make, the impact of the products you build, and the influence vested in you to help ensure that this institution continues to be an agent of good and an instrument for change.

Finally, they need your selfless courage. At times, you may be called to place Democratic goals and the public good above the primacy of individual interests. Your work here in service of our democracy shows that you already know how to do that.

You are an exceptional group of people whose hearts keep beat with my own. I'll be rooting for your success every day. Thanks for everything and please stay in touch.

-Aaron-

[REDACTED]

Aaron Ting
(he/him/his)
Director & Associate General Counsel | ActBlue



EXHIBIT 17

Internal Messages between Candace King and
ActBlue Employee (Feb. 25, 2025)

Short Message Report

Conversations: 1	Participants: 3
Total Messages: 15	Date Range: 2/25/2025

Outline of Conversations



15 messages on 2/25/2025 • Candace King • [REDACTED] • [REDACTED]

Messages in chronological order (times are shown in GMT +00:00)

CK Candace King 2/25/2025, 7:15 PM
hey lady! have a min for a quick huddle at 11:30?

>   2/25/2025, 7:15 PM
Hi!! Yes, I do

> CK Candace King 2/25/2025, 7:16 PM
Zain Ahmad submitted a leave request? and i'd love to get a bit more context.

> CK Candace King 2/25/2025, 7:16 PM
call you then!

>   2/25/2025, 7:16 PM
Okay!!

>   2/25/2025, 7:30 PM
Calling via Huddle

>   2/25/2025, 7:30 PM
<No text available>

> CK Candace King 2/25/2025, 7:31 PM
be right there

>   2/25/2025, 7:31 PM
okay!

> CK Candace King 2/25/2025, 7:32 PM
calling now!

>   2/25/2025, 7:52 PM
I just spoke to Zain..

>   2/25/2025, 7:54 PM
He is sick he was coughing the entire call he shared it's the Flu/Phenomena

> CK Candace King
but 12 weeks?! sheesh

2/25/2025, 8:43 PM

> [REDACTED]
That's what I said!

2/25/2025, 8:43 PM

> [REDACTED]
I think that is a factor but something else too

2/25/2025, 8:44 PM

EXHIBIT 18

Internal Messages between Candace King and
ActBlue Employee (Feb. 26, 2025)

Short Message Report

Conversations: 1	Participants: 3
Total Messages: 44	Date Range: 2/26/2025

Outline of Conversations

	• 44 messages on 2/26/2025 • Candace King • •
---	---

Messages in chronological order (times are shown in GMT +00:00)

 [REDACTED]

CK Candace King 2/26/2025, 2:06 AM
Hi [REDACTED] can you please call me

> [REDACTED] 2/26/2025, 2:07 AM
Huddle?

> CK Candace King 2/26/2025, 2:07 AM
Yes please

> [REDACTED] 2/26/2025, 2:07 AM
<No text available>

> [REDACTED] 2/26/2025, 2:51 PM
Hey - just checking in. We still good with the account setup we talked about last night?

> CK Candace King 2/26/2025, 2:58 PM
Morning! Yes! We are on hold this morning. Thank you.

> [REDACTED] 2/26/2025, 2:58 PM
:saluting_face:

> CK Candace King 2/26/2025, 4:25 PM
hi [REDACTED] think we're ready to take another step.

> [REDACTED] 2/26/2025, 4:25 PM
🙏

> CK Candace King 2/26/2025, 4:25 PM
can you grant me access to Zain's gsuite?

> CK Candace King 2/26/2025, 4:25 PM
email and drive

> [REDACTED] 2/26/2025, 4:26 PM
Do you want to keep his accounts active?

> CK Candace King 2/26/2025, 4:26 PM
yes. he should still be active just unable to access his account himself.

> CK Candace King 2/26/2025, 4:26 PM
i'd like to put an out of office up for him

> CK Candace King 2/26/2025, 4:27 PM
do we have a general matters legal inbox?

> CK Candace King 2/26/2025, 4:27 PM
like the ones we have for HR and IT?

> [REDACTED] 2/26/2025, 4:32 PM
Screenshot 2025-02-26 at 11.32.15 AM.png

<Message sent with an attachment>

GROUPS

[REDACTED]
[REDACTED]@actbluetech.com (alias)

[REDACTED]
[REDACTED]@actblue.com

[REDACTED]
[REDACTED]@actblue.com

[REDACTED]
[REDACTED]@actblue.com

[REDACTED]
[REDACTED]@actblue.com

[REDACTED]
[REDACTED]@actblue.com

Image: JUNO_APRIL_SLACK00100041285.png (79 KB)

> [REDACTED] 2/26/2025, 4:34 PM
Here's the list of legal accounts

> [REDACTED] 2/26/2025, 4:34 PM
Trying to figure out how to get you into Zain's account while keeping it active and tied to Okta

> CK Candace King 2/26/2025, 4:36 PM
ok and who has access to the <mailto:[REDACTED]@actblue.com| [REDACTED]@actblue.com> box? is that all internal counsel and

compliance?

> [REDACTED]

2/26/2025, 4:37 PM

Screenshot 2025-02-26 at 11.37.06 AM.png

<Message sent with an attachment>



☐	Member	email	Role	Type
☐	[REDACTED]	[REDACTED]@actblue.com	Member	User
☐	[REDACTED]	[REDACTED]@actblue.com	Member	User
☐	[REDACTED]	[REDACTED]@actblue.com	Owner	User
☐	[REDACTED]	[REDACTED]@actblue.com	Member	User
☐	[REDACTED]	[REDACTED]@actblue.com	Member	User
☐	[REDACTED]	[REDACTED]@actblue.com	Manager	User

Image: JUNO_APRIL_SLACK00100041290.png (138 KB)

> CK Candace King
perfect!

2/26/2025, 4:37 PM

> CK Candace King
thank you

2/26/2025, 4:37 PM

> CK Candace King
cna we remove [REDACTED]?

2/26/2025, 4:38 PM

> [REDACTED]
done

2/26/2025, 4:38 PM

> CK Candace King
thank you!

2/26/2025, 4:38 PM

> CK Candace King
Can we also update Zain's out of office please? email replies should read

2/26/2025, 4:52 PM

Please be advised that I am currently out of the office and will have limited access to email.
If you require immediate assistance, please contact [REDACTED]@actblue.com [REDACTED]@actblue.com>.
Thank you for your understanding.

> CK Candace King
note the legal was misspelled so i just fixed that for the OOO
"[REDACTED] reacted with "thank_you"

2/26/2025, 5:23 PM

> CK Candace King 2/26/2025, 6:10 PM
Hi [REDACTED] i just received a message from Zain in email!

> CK Candace King 2/26/2025, 6:11 PM
i thought he was suspended.

> CK Candace King 2/26/2025, 6:14 PM
can we hop on a huddle?

> [REDACTED] [REDACTED] 2/26/2025, 6:18 PM
<No text available>

> [REDACTED] [REDACTED] 2/26/2025, 6:45 PM
OK

> [REDACTED] [REDACTED] 2/26/2025, 6:51 PM
I'm not in panic mode anymore. Here's the login to Zain's account: [REDACTED]
[REDACTED]

<Message sent with an attachment>

[REDACTED]

Image: JUNO_APRIL_SLACK00100041304.png (164 KB)

> [REDACTED] [REDACTED] 2/26/2025, 6:51 PM
Happy to hop on a huddle if you need help with any of this!

> CK Candace King 2/26/2025, 6:53 PM
yes please!

> CK Candace King 2/26/2025, 6:53 PM
huddle

> [REDACTED] 2/26/2025, 6:53 PM
<No text available>

> CK Candace King 2/26/2025, 11:19 PM
[REDACTED] i'm receiving wind that Zain was posting in ITsupport and it was pulled down somehow? I dont' see anything

> [REDACTED] 2/26/2025, 11:19 PM
I deleted it

> [REDACTED] 2/26/2025, 11:20 PM
I'm also getting text messages from unknown phone numbers about it too

> [REDACTED] 2/26/2025, 11:20 PM
and like [REDACTED] and [REDACTED] are pinging me to restore access

> CK Candace King 2/26/2025, 11:20 PM
we are not restoring access

> [REDACTED] 2/26/2025, 11:21 PM
[REDACTED]

EXHIBIT 19

ActBlue internal memorandum, *Fraud Prevention Stakeholders Writeup [2023]*

Fraud Prevention Stakeholders Writeup [2023]

Purpose

The purpose of this document is to re-examine the relationship between various stakeholders in the Fraud Prevention workflow.

Understanding the context and pain points will help us understand what steps we should take to establish healthy coordination between very busy individuals.

The goal of having stakeholders isn't to meet just for the sake of meeting, but to legitimately achieve consensus on this important workflow.

Context & Pain Points

In 2020, there were several people thought to be stakeholders of the Fraud Prevention workflow. There was not much collaboration between the stakeholders as it related to the regular administration of the workflow. At most, they were kept in the loop on important topics, discussed contracts, raised technical issues, and for some time ██████ sought consensus before deploying changes to rules/processes. Three of the five main stakeholders have left ActBlue, and one is currently out of office for an extended period.

Without a clear understanding of stakeholders, it becomes difficult to know where to raise issues, find collaborators on ideas, obtain requisite permissions, etc. Our relationship with Sift is a very expensive and important one. It is a common occurrence that our contract comes up in our conversations with our Sift Account Representatives, and I am fully unable to discuss, or even understand, that aspect of our relationship with them, and frankly, I don't know to whom I should speak if I needed to. A similar situation exists with our technical implementation.

Fraud Prevention is something we will likely always do at ActBlue in some capacity, but how we get a return on our investment is something we need to discuss more robustly. Part of that includes how we market, if at all, our fraud prevention efforts to existing and potential customers. Therefore, we should include admin-facing stakeholders, who will likely also receive questions when fraud prevention interferes with admin fundraising efficiency.

List of Stakeholders

- Darrin Hurwitz - General Counsel
- [REDACTED] - Director of Product
- Eric Hoke - Compliance Director
- [REDACTED] - Senior Product Manager II
- [REDACTED] - Research Director
- [REDACTED] - VP Engineering
- [REDACTED] - VP Comms and Marketing
- [REDACTED] - Sr. Compliance Associate
- [REDACTED] - Sen. Platform Security Manager
- [REDACTED] - Staff Counsel II
- [REDACTED] - Director, Donor Support
- [REDACTED] - VP Product

EXHIBIT 20

ActBlue Leave of Absence & FMLA Guidance

Leave of Absence & FMLA Guidance

This page provides guidance for ActBlue staff regarding Leave of Absence and Family and Medical Leave Act (FMLA), including employee eligibility, reasons for leave, and the amount of leave available. It outlines various leave options, such as military caregiver leave, personal leave, and domestic violence leave, while emphasizing job protection and confidentiality. Additionally, it details employee rights, responsibilities, and the continuation of pay and benefits during approved leaves.

? For more questions on Leave of Absence and FMLA, please contact

@actblue.com

All conversations and documentation will be handled confidentially.

▼ Table of Contents

-  How to Submit a Leave of Absence in Tilt
-  Family and Medical Leave Act (FMLA)
 -  Eligibility
 -  Applicable FMLA Reasons
 -  Amount of Leave
 -  Military Caregiver Leave
 -  Intermittent Leave or Reduced Work Schedule
 -  Employee Notice Requirement
 -  Designation of FMLA Leave
 -  Intent to Return to Work from FMLA Leave
 -  Medical Leave
 -  Parental Leave*
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 -  Witness Protection Leave
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 -  Disclaimer: Interaction With Other State and Federal Leave Programs
 -  Employee Rights and Responsibilities
 -  Required Notices
 -  Leave of Absence FAQs

⚠ ActBlue uses **Tilt** as our official leave management platform. Tilt is our partner in guiding employees through the entire leave process from start to finish. To begin your leave, you'll need to **submit your request directly through the Tilt platform**

➡ How to Submit a Leave of Absence in Tilt

1. Log into Tilt using SSO in Okta or by using Rippling

2. **Start Your Leave Request**

Click the **"Request a Leave"** button on your Tilt homepage to begin.

3. **Complete the Leave Form**

Provide the required details, including:

- Type of leave (e.g., medical, parental, personal)
- Job title, location, and scheduled hours
- Anticipated start and return dates
- Personal contact info and communication preferences

4. **Submit Your Request**

Click **"Submit"** once the form is complete. You'll receive a confirmation on your dashboard, and your request will move to review.

5. **Tilt and P&C Review Process**

6. Your request will first be reviewed by the P&C team.
7. Then, a **Tilt Leave Success Manager** will create your custom leave plan.
8. You'll be notified when your leave plan is finalized, typically within 5–7 business days.

🔄 Need to Update Your Request?

If your leave status is still "Waiting on Employee," you can edit the request directly in Tilt. Once it's marked as "Under Review," updates may need to wait until your leave plan is published.

👤 Family and Medical Leave Act (FMLA)

ActBlue complies with and expands upon the federal Family and Medical Leave Act (FMLA), in addition to applicable state and local leave regulations. Under the FMLA, eligible employees are granted up to 12 weeks of job-protected leave during a 12-month period (or up to 26 weeks of military caregiver leave). Unless required by specific state requirements, FMLA leave is not paid,

but oftentimes run concurrently with a different leave option that provides pay and benefits to the employee.

Eligibility

To be eligible for FMLA leave, employees must meet **all** of the following requirements:

- Be actively employed with ActBlue when the leave begins.
- Have worked at least twelve (12) months for ActBlue. The 12 months of employment do not have to be consecutive. All periods of absence from work due to or necessitated by service in the uniformed services are counted as hours worked in determining eligibility.
- Have worked at least 1,250 hours for ActBlue over the twelve (12) months preceding the date the leave would commence.

Applicable FMLA Reasons

To qualify as FMLA leave under this policy, the leave must be for one of the following reasons:

- The birth of a child or placement of a child with the employee for adoption or foster care.
- To care for a spouse, domestic partner, child, or parent who has a serious health condition.
- For a serious health condition that makes the employee unable to perform the essential functions of his or her job.
- For any qualifying exigency arising out of the fact that a spouse, domestic partner, child, or parent is a military member on covered active duty or on call to covered active duty status.
- To care for a covered service member with a serious injury or illness.

Amount of Leave

An eligible employee can take up to 12 weeks of FMLA leave during any 12-month period. ActBlue will measure the 12-month period as a rolling 12-month period measured backward from the date an employee uses any leave under this policy. Each time an employee takes FMLA leave, the amount of time taken under this policy in the last 12 months will be subtracted from the 12 weeks of available leave, and the balance remaining is the amount the employee is entitled to take at that time. Note, that ActBlue may grant additional time off for employees based on need, applicable law, and business circumstances.

Military Caregiver Leave

An eligible employee can take up to 26 weeks for the FMLA military caregiver leave during a single 12-month period. For this military caregiver leave, the company will measure the 12-month period as a rolling 12-month period measured forward. FMLA leave already taken for other FMLA circumstances will be deducted from the total of 26 weeks available.

Intermittent Leave or Reduced Work Schedule

Employees may take FMLA leave in one consecutive block of time, may use the leave intermittently (take a day periodically when needed over the year), or, under certain circumstances, may use the leave to reduce the workweek or workday, resulting in a reduced hour schedule.

Under the FMLA, employers may temporarily transfer an employee to an available alternative position with equivalent pay and benefits if the alternative position would better accommodate the intermittent or reduced schedule in instances when leave for the employee or employee's family member is foreseeable and for planned medical treatment, including recovery from a serious health condition or to care for a child after birth or placement for adoption or foster care.

For the birth, adoption, or foster care of a child, the company and the employee must mutually agree to the schedule before the employee may take the leave intermittently or work a reduced-hour schedule. Leave for birth, adoption or foster care of a child must be taken within one year of the birth or placement of the child.

When leave is needed for planned medical treatment, the employee must make a reasonable effort to schedule treatment so as not to unduly disrupt the company's operations.

Employee Notice Requirement

Under the FMLA, employees requesting FMLA leave must provide verbal or written notice of the need for leave to their manager or P&C Manager. ActBlue encourages folks to reach out to @actblue.com directly for leave planning support.

If the need for leave is expected, the employee should give ActBlue a minimum of 30 days' notice or as much notice as possible. In situations where the need for FMLA leave is unforeseen, the employee should notify ActBlue by the next business day unless they are unable to do so. In the case of incapacitation, they should inform ActBlue as soon as possible or have a personal designee contact us in their absence.

Within five business days after the employee has provided this notice, P&C will complete and provide the employee with a Notice of Eligibility and Rights and request a medical certification or other supporting documentation as necessary.

Designation of FMLA Leave

Within five business days after the employee has submitted the required certification or other documentation, P&C will complete and provide the employee with a written response to the employee's request for FMLA leave using the FMLA Designation Notice.

Intent to Return to Work from FMLA Leave

Employees should notify their Manager and P&C of any changes to their employment status or return to work date when applicable. On a basis that does not discriminate against employees on FMLA leave, ActBlue may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

Medical Leave

ActBlue provides every benefits-eligible, permanent employee with short-term disability and long-term disability insurance through MetLife insurance at no cost to staff. Employees taking a medical leave of absence are generally eligible to file a claim for short-term disability. Pending claim acceptance, employees receive up to 60% of their regular weekly wages through MetLife (up to a maximum of \$2,500/week, less taxes) for a period of up to 12 weeks. The remaining 40% of wages are paid by ActBlue via regular payroll.

- For more details on STD please review [MetLife STD--Employee Summary.pdf](#)
- For more details on LTD please review [MetLife LTD--Employee Summary](#)

Parental Leave*

**Non-represented employees only. Represented employees please refer to your applicable CBA.*

Employees will be granted twenty (20) weeks of paid leave for parental leave. Parental leave must be taken during the first twelve (12) months following the child's birth or placement of the child with the Employee for adoption or foster care. Leave can be taken continuously or intermittently. Non-birthing and adoptive parents are also eligible for Parental leave. This leave runs concurrently with FMLA if applicable. Employees represented by a collective bargaining agreement should refer to their CBA for parental leave options.

Military Leave

ActBlue provides military leave for employees who serve in the United States Armed Forces, including the National Guard and Reserves, to take time off from their civilian jobs to fulfill their military obligations. This leave is designed to protect the employment rights of those who are called to active duty, training, or deployment.

- **Eligibility:** Applies to employees who are members of the Armed Forces, including the National Guard and Reserves.
- **Duration:** The length of leave depends on the duration of the military service or training. Employees are entitled to the full period required for their duty, including recovery time for

service-related injuries.

- **Job Protection:** Under the Uniformed Services Employment and Reemployment Rights Act (USERRA), employees on military leave are entitled to return to their civilian job with the same status, seniority, and benefits as if they had not been absent.

Witness Protection Leave

ActBlue provides leave options for witness protection that allows employees who are involved in legal proceedings as witnesses to take time off from work without jeopardizing their employment. This leave is designed to support individuals who may be required to testify, provide evidence, or participate in legal processes under subpoena or court order, particularly in cases where witness protection is necessary for their safety.

- **Eligibility:** All employees who are required by law to testify or participate in legal proceedings as witnesses, especially those placed in witness protection programs.
- **Duration:** The duration of the leave depends on the length of time the employee is required to be involved in the legal proceedings. This could range from a single day to an extended period, depending on the case.
- **Job Protection:** Employees on Witness Protection Leave are entitled to job protection, meaning their position or an equivalent one will be available to them when they return from leave.
- **Confidentiality:** For employees in witness protection, additional confidentiality measures may be taken to ensure their safety and privacy during and after their leave.

Domestic Violence Leave

ActBlue offers domestic violence leave that allows employees who are victims of domestic violence, sexual assault, stalking, or other forms of abuse to take time off from work to address personal, legal, and safety needs related to the situation. This leave is designed to support individuals as they navigate the complexities of dealing with abuse while maintaining job security.

- **Eligibility:** Employees who are victims of domestic violence, sexual assault, stalking, or other abuse, or who need to support a family member facing such issues.
- **Permitted Uses:**
 - Seeking medical attention for injuries related to the abuse.
 - Obtaining legal assistance, including filing for protective orders or attending court proceedings.
 - Receiving counseling or mental health services.
 - Relocating to ensure safety for themselves or their family.

- Attending to other necessary activities related to the violence or abuse, such as meeting with law enforcement.
- **Duration:** The length of leave varies by jurisdiction, but it generally provides sufficient time to address immediate safety, legal, and medical needs.
- **Job Protection:** Employees are entitled to job protection during domestic violence leave, meaning they cannot be penalized for taking time off for these reasons, and their position or an equivalent role will be available upon their return.
- **Confidentiality:** Employers are often required to maintain confidentiality regarding an employee's use of domestic violence leave, to protect their privacy and safety.

Personal Leave

A personal leave of absence may be reviewed and considered when an individual needs to take time off, beyond PTO, due to extreme or extenuating circumstances that are not covered by other ActBlue leave options (e.g., parental, medical, or family leave). These situations are reviewed carefully to ensure they meet specific criteria, and the leave may be granted based on the nature of the request and organizational needs. Personal leave is intended for exceptional cases where other leave types do not apply, and it is typically reserved for serious personal matters that require extended time away from work.

Leave Options Under the ADA (Americans with Disabilities Act)

Under the ADA, employees with a qualifying disability may be entitled to additional leave as a reasonable accommodation if they are unable to perform the essential functions of their job due to their condition. This leave may be provided even if the employee is not eligible for FMLA or has exhausted their FMLA leave. The ADA does not set a specific duration for leave, but the amount of leave provided must be reasonable and not impose undue hardship to ActBlue.

In addition to extended leave, employees returning from ADA-related leave may also request reasonable accommodations, such as modified duties, adjusted schedules, or assistive devices, to help them successfully transition back to work. The goal of ADA leave accommodations is to ensure employees with disabilities have the support they need to remain employed, while balancing the needs of the business.

ActBlue is committed to working with employees to explore reasonable accommodations, including leave, to support their health and well-being under ADA guidelines. For additional support or questions on accommodation visit our [resource page](#).

State Specific Quick Links

▼ California

- [CA Disability Paid Family Leave](#)

▼ Colorado

- [CO FAMLI](#)

▼ Connecticut

- [CT Paid Family and Medical Leave](#)

▼ Washington, D.C.

- [D.C. Universal Paid Leave](#)

▼ Massachusetts

- [MA Paid Family & Medical Leave](#)

▼ New Jersey

- [NJ Temporary Disability Insurance](#)
- [NJ Family Leave Insurance](#)

▼ New York

- [NY Disability Insurance](#)
- [NY Paid Family Leave](#)

▼ Oregon

- [OR Paid Family Leave](#)

▼ Washington

- [WA Paid Family & Medical Leave](#)

Guidance

Pay and Benefits Continuation

In most cases, employees on leave will continue to receive full pay along with uninterrupted health benefits. People & Culture will work to coordinate employees' pay and benefits throughout their leave whenever possible. However, for state-run disability and paid family leave programs, employees will need to apply for those benefits directly. P&C will provide the necessary guidance and resources to help employees navigate these state programs in conjunction with ActBlue's benefits. It's important to note that under no circumstances will an employee's combined state and ActBlue pay exceed 100% of their usual earnings.

Throughout an approved leave of absence, health insurance benefits—such as medical, dental, vision, and company-paid disability and life insurance—will remain active and uninterrupted. Employees enrolled in voluntary benefits, such as supplemental life insurance or FSA plans, will be required to maintain their monthly premium payments, which are typically deducted from their regular payroll. Upon returning from leave, employees will be responsible for covering any payments for employee-elected benefits.

Out-of-Office Template

This guide is designed to support employees and their managers in planning for an extended absence.

Employee Status During Leave

To prioritize your well-being, ensure uninterrupted time off, and uphold security best practices, ActBlue will temporarily restrict access to most internal systems for leaves longer than 30 days. This approach allows you to fully disconnect and recharge during your time away.

While access to most systems will be paused, essential tools such as email, Slack, UKG, Expensify, and Confluence will remain available to ensure continuity if necessary. This does not impact intermittent leaves or flexible work schedules.

Guidance for Exhausting Leave

When an employee exhausts their available leave—whether under FMLA, ADA accommodations, disability leave, or any other type of leave—they are generally expected to return to work on the next scheduled workday.

If an employee is unable to return to work after exhausting all applicable leave:

1. **Communicate with manager and P&C:** The employee should promptly notify either manager or P&C about their situation. P&C will evaluate whether additional accommodations or leave extensions may be available under the ADA or other policies.
2. **Reasonable Accommodation (ADA):** If the inability to return is due to a medical condition that qualifies as a disability, P&C may explore whether a reasonable accommodation, such as extended unpaid leave, reduced hours, or modified duties, can be provided. Any extension of leave must not create an undue hardship to ActBlue.
3. **Return-to-Work Plan:** If additional leave is not granted, the employee is required to either return to their position or engage in discussions regarding their ability to fulfill job duties.
4. **Failure to Return:** If the employee does not return to work or fails to provide the necessary documentation for continued leave or accommodations, ActBlue may consider the absence

as a voluntary resignation. At this point, termination of employment may occur, following a thorough review of the situation and consistent with ActBlue policies.

Employees are encouraged to maintain open communication with P&C to avoid misunderstandings and explore all available options before leave is exhausted.

● Employee Status After Leave

Depending on the type of leave, a return-to-work release may be required. P&C will inform the employee if any documentation is needed prior to their return.

Generally, employees returning from FMLA leave will be reinstated to their previous position or to a role with equivalent status, pay, benefits, and working conditions. The role will be the same or nearly identical in all essential aspects.

Additionally, disability leave for the birth of a child, an employee's serious health condition, (when applicable) will run concurrently with FMLA, provided the employee is eligible for both.

⚠ Disclaimer: Interaction With Other State and Federal Leave Programs

Time off taken under ActBlue's leave of absence policies run concurrently with other state and federal programs, including the FMLA, unless prohibited by law.

⚖ Employee Rights and Responsibilities

The P&C team strives to streamline the leave of absence process by ensuring employees understand the benefits available to them. It's also important that ActBlue provide and gather the necessary documentation needed to administer policies consistently and in compliance with applicable law.

Therefore, employees seeking to take a leave of absence must submit a leave of absence request form prior to their leave start date or as soon as possible if advance notice is not known.

📋 Required Notices

If you are located in the following states please review your required employee notices:

- California
- Colorado
- Connecticut
- Washington, D.C.
- Massachusetts
- New Jersey
- New York

- Oregon
- Washington

🔗 Leave of Absence FAQs

✓ Will my healthcare or other benefits be impacted while on leave?

No. All employee benefits remain in effect while on an approved leave of absence.

✓ What do managers need to do if their employee notifies them of a potential leave of absence need?

Support your staff through their leave. Engage in thoughtful leave planning to support ongoing work, realign project timelines, and if applicable, revisit goals. Respect their uninterrupted time away from work.

See below for a more comprehensive list of manager responsibilities:

- Defer to P&C; we're here to support: if you're made aware of a potential leave, even if you're not sure if the situation qualifies as an leave of absence, advise your staff to reach out to [REDACTED]@actblue.com
- Become familiar with these *potential* leave of absence triggers:
 - Medical, parental and family leaves longer than 5 consecutive business days
 - Personal time off exceeding 3 consecutive weeks where the reason is unclear.
 - Not every situation falling into these two categories will be an official LoA, however notification to P&C is critical to ensure everyone understands the resources and benefits available to them and that as an employer, we administer our policies consistently, equitably and in compliance with the law.
- Respect personal and protected health information. Do not ask probing questions on the reason for the leave; P&C will gather necessary info.
- Align on communication preferences during leave with the understanding that most leaves offer protections under federal and/or state law, including the right to uninterrupted, job-protected time off. Employees on leave should not be working. Align with your staff on if and to what extent they wish to be cc'd on while out, with the expectation that they are not to engage in any work until they return.
 - If you notice your direct report is working while on a leave, immediately ask them to stop and notify P&C if this continues.
- Support staff as they return from leave by aligning on schedules, setting clear expectations and remaining flexible as they adjust back to work.

abc Definitions

Serious health condition	means an illness, injury, impairment, or physical or mental condition that involves inpatient care or continuing treatment by a healthcare provider. This can include conditions with short-term, chronic, long-term or permanent periods of incapacity.
Spouse	means a husband or wife as defined or recognized in the state where the individual was married and includes individuals in common law or same-sex marriage. Spouse also includes a husband or wife in a marriage that was validly entered into outside of the United States, if the marriage could have been entered into in at least one state.
Domestic Partner	means an adult person whom the employee deems as their significant other and whom they share a residence with.
Child	means a biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is either under age 18, or age 18 or older and “incapable of self-care because of a mental or physical disability” at the time that FMLA leave is to commence.
Parent	means a biological, adoptive, step or foster father or mother, or any other individual who stood in loco parentis to the employee when the employee was a child. This term does not include parents “in law.”
Qualifying exigency	includes short-notice deployment, military events and activities, child care and school activities, financial and legal arrangements, counseling, rest and recuperation, post-deployment activities, and additional activities that arise out of active duty, provided that the employer and employee agree, including agreement on timing and duration of the leave.
Covered active duty	for members of a regular component of the Armed Forces, means duty during deployment of the member with the Armed Forces to a foreign country. For a member of the Reserve components of the Armed Forces, means duty during the deployment of the member with the Armed Forces to a foreign country under a federal call or order to active duty in support of a contingency operation, in accordance with 29 CR 825.102.

The next of kin of a covered service member	is the nearest blood relative, other than the covered service member's spouse, parent or child in the following order of priority: blood relatives who have been granted legal custody of the service member by court decree or statutory provisions, brothers and sisters, grandparents, aunts and uncles, and first cousins, unless the covered service member has specifically designated in writing another blood relative as his or her nearest blood relative for purposes of military caregiver leave under the FMLA.
Covered service member	is a current member of the Armed Forces, including a member of the National Guard or Reserves, who is receiving medical treatment, recuperation or therapy, or is in outpatient status or on the temporary disability retired list for a serious injury or illness.
Serious injury or illness	is one that is incurred by a service member in the line of duty on active duty that may cause the service member to be medically unfit to perform the duties of his or her office, grade, rank or rating. A serious injury or illness also includes injuries or illnesses that existed before the service member's active duty and that were aggravated by service in the line of duty on active duty.

▲ To the extent this space conflicts with or is inconsistent with any article of an applicable collective bargaining agreement, the terms of the collective bargaining agreement shall govern.

This guidance is currently under negotiation with CWG. If you are a member of the CWG Union, please refer to the previous version of this space [here](#) until a agreement is finalized.