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One Hundred Nineteenth Congress of the United States House of Representatives

COMMITTEE ON HOUSE ADMINISTRATION

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May 7, 2025

The Honorable Pamela J. Bondi Attorney General U.S. Department of Justice 950 Pennsylvania Ave, NW Washington, DC 20530

Dear Attorney General Bondi:

The Committee on House Administration, the Committee on the Judiciary, and the Committee on Oversight and Government Reform have broad oversight of our nation's federal campaign finance laws. On April 24, 2025, President Trump issued a memorandum directing the Department of Justice (DOJ) to "investigate allegations regarding the unlawful use of online fundraising platforms to make 'straw' or 'dummy' contributions or foreign contributions to political candidates." The Committees write today to draw your attention to our ongoing investigation into ActBlue, a political action committee and fundraising platform for the Democrat Party. The oversight has uncovered that ActBlue has weak fraud-prevention practices and overlooks bad actors, including foreign actors, who take advantage of the platform to make illicit political donations. ActBlue's concerning activities may have a direct effect on U.S. political campaigns and elections.

Since October 2023, the Committee on House Administration (CHA) has been investigating ActBlue's activities to understand how it operates as a platform for online donations, and to ensure that all collected contributions are legally obtained. CHA's interest arose from reporting that ActBlue was accepting credit card contributions without a card verification value (CVV)—such donations are often untraceable and can be used by bad actors to make fraudulent and illicit contributions.³

On October 31, 2023, Chairman Steil sent a letter to ActBlue requesting information about the platform's practices, questioning if it was complying with federal campaign finance

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 Memorandum from The White House to The Secretary of the Treasury, The Attorney General, The Counsel to the President, *Investigation into Unlawful "Straw Donor" and Foreign Contributions in American Elections* (Apr. 24, 2025).

³ See Hollie McKay, Exclusive: Data shows that half of 2019 donations to ActBlue came from untraceable 'unemployed' donors, FOX NEWS (Sept. 12, 2020).

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laws and preventing foreign and illegal contributions. Following ActBlue's lackluster response, in which the platform confirmed that it did not collect CVVs, Chairman Steil introduced legislation to prohibit political committees from accepting online contributions without the CVV and billing address associated with the card, and from accepting online contributions from prepaid cards. The legislation, the SHIELD Act, would also prohibit individuals from knowingly directing, helping, or assisting a person in making a contribution in the name of another person. We remain committed to rooting out foreign influence in American elections, and Chairman Steil plans to reintroduce the SHIELD Act this Congress.

On October 28, 2024, CHA sent a letter to ActBlue requesting documents and information related to the platform's donor verification policies and potential vulnerabilities that foreign actors may exploit to illegally participate in or influence U.S. political processes. To ensure compliance with the requests, CHA subsequently issued a subpoena to ActBlue for documents relating to ActBlue's donor verification policies, contributions originating outside of the United States, deplatformed entities, and reported unauthorized or fraudulent donations. ActBlue's responsive documents confirmed that the platform accepted unverified payments during a period of record campaign fundraising. Although ActBlue has since updated its policies to reject donations without safeguards such as a CVV requirement, the Committees' oversight found that ActBlue implemented these changes only after ensuring that they would not negatively impact Democrat donations. 10

On December 9, 2024, CHA, along with the Judiciary Committee, sent a letter to Sift, the company that provides fraud detection and prevention services for ActBlue, requesting documents related to Sift's efforts to deter illicit election funding by foreign actors. ¹¹ The responses from ActBlue and Sift have shed some light on the nature of their operations, but many questions remain, especially considering the recently reported series of staff resignations from ActBlue. ¹²

Since March 2025, CHA, the Oversight and Government Reform Committee, and the Judiciary Committee have worked with the Department of the Treasury to access suspicious

⁴ Letter from Hon. Bryan Steil, Chairman, H. Comm. on Admin., to Ms. Regina Wallace-Jones, Chief Executive Officer & President, ActBlue (Oct. 31, 2023).

⁵ Secure Handling of Internet Electronic Donations (SHIELD) Act, H.R. 9488, 118th Cong. (2024).

[°] Id.

⁷ Letter from Hon. Bryan Steil, Chairman, H. Comm. on Admin., to Ms. Regina Wallace-Jones, Chief Executive Officer & President, ActBlue (Oct. 28, 2024).

⁸ Letter from Hon. Bryan Steil, Chairman, H. Comm. on Admin., to Ms. Regina Wallace-Jones, Chief Executive Officer & President, ActBlue (Oct. 30, 2024).

⁹ Press Release, H. Comm. on Admin., Chairman Steil Releases Findings from Subpoena of ActBlue (Dec. 10, 2024).

¹⁰ Staff of H. Comm. on the Judiciary, Comm. on H. Admin., & H. Comm. on Oversight & Gov't Reform, Fraud on ActBlue: How the Democrats' Top Fundraising Platform Opens the Door for Illegal Election Contributions (Apr. 2, 2025).

¹¹ Letter from Hon. Bryan Steil, Chairman, H. Comm. on Admin. & Hon. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Mr. Kris Nagel, Chief Executive Officer, Sift (Dec. 9, 2024).

¹² See Reid J. Epstein & Shane Goldmacher, ActBlue, the Democratic Fund-Raising Powerhouse, Faces Internal Chaos, N.Y. TIMES (Mar. 6, 2025).

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activity reports (SARs) related to ActBlue, including the reports withheld by the Biden Administration. ¹³ The Committees continue to review relevant SARs on a rolling basis.

Subsequently, following the publicized resignations of several high-level ActBlue officials, the Committees sent an additional letter to ActBlue on April 2, 2025, to address ActBlue's "internal turmoil, lack of a functioning legal team, possible retaliatory actions, and failure to take fraud seriously." The letter included two requests for transcribed interviews with ActBlue employees. 15

In conjunction with the April 2 letter, the Committees released a joint report, revealing that ActBlue knowingly made its fraud-prevention rules more lenient multiple times in 2024, despite knowledge of extensive fraud on the platform, including from foreign sources. ¹⁶ The report detailed internal communications showing that ActBlue attempted to hide fraud-related policy changes to avoid public discourse about the fraud executed on its platform. ¹⁷ The report also highlighted hundreds of foreign donations made from foreign IP addresses on the ActBlue platform. ¹⁸ ActBlue's fundamentally unserious approach to fraud prevention empowers foreign influence and infiltration while jeopardizing the integrity of U.S. elections. Most recently, the Committees requested transcribed interviews with four other former ActBlue employees who possess pertinent knowledge of ActBlue's fraud-prevention practices and policies. ¹⁹

As we continue our oversight to inform potential legislative reforms, the Committees would like to emphasize the importance of the ActBlue investigation and work collaboratively with DOJ to improve and strengthen the integrity of America's electoral system.

Sincerely,

¹³ Letter from Hon. Bryan Steil, Chairman, H. Comm. on Admin., et al., to Hon. Scott Bessent, Sec'y, U.S. Dep't of the Treasury (Mar. 10, 2025).

¹⁴ Letter from Hon. Bryan Steil, Chairman, H. Comm. on Admin., et al., to Ms. Regina Wallace-Jones, Chief Executive Officer & President, ActBlue (Apr. 2, 2025).

¹⁶ See Staff of H. Comm. on the Judiciary, Comm. on H. Admin., & H. Comm. on Oversight & Gov't Reform, Fraud on ActBlue: How the Democrats' Top Fundraising Platform Opens the Door for Illegal Election Contributions (Apr. 2, 2025).

¹⁷ Id. at 8-9.

¹⁸ Id. at 17.

¹⁹ See Letter from Hon. Bryan Steil, Chairman, Comm. on H. Admin, et al., to Mr. Darrin Hurwitz, former General Counsel, ActBlue (Apr. 18, 2025); Letter from Hon. Bryan Steil, Chairman, Comm. on H. Admin, et al., to Mr. Peter Slutsky, former Chief Revenue Officer, ActBlue (Apr. 18, 2025); Letter from Hon. Bryan Steil, Chairman, Comm. on H. Admin, et al., to Ms. Alyssa Twomey, former Vice President of Customer Service, ActBlue (Apr. 18, 2025); Letter from Hon. Bryan Steil, Chairman, Comm. on H. Admin, et al., to Ms. Natalie Niemeyer, former Assistant Director of Research, ActBlue (Apr. 18, 2025).

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Bryan Steil Chairman

Committee on House Administration

Jim Jordan Chairman

Committee on the Judiciary

James Comer Chairman

Committee on Oversight and Government Reform

cc: The Honorable Joseph D. Morelle, Ranking Member, Committee on House Administration

The Honorable Jamie Raskin, Ranking Member, Committee on the Judiciary

The Honorable Gerald Connolly Ranking Member, Committee on Oversight and Government Reform