

September 12, 2026

Ronald C. Machen

Honorable Jim Jordan

Chairman, Committee on the Judiciary
U.S. House of Representatives

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Honorable James Comer

Chairman, Committee on Oversight and Government Reform
U.S. House of Representatives

Honorable Bryan Steil

Chairman, Committee on House Administration
U.S. House of Representatives

Re: Allegations Regarding ActBlue's November 2023 Letter To The Committees

Dear Chairmen Jordan, Comer, and Steil:

I write in response to the Committees' April 20, 2026 interim staff report regarding my client, ActBlue. That interim report recapitulated allegations from the media that ActBlue inaccurately described its donor-vetting processes in a November 27, 2023 letter to the Committees. Specifically, the interim report alleged that ActBlue's November 2023 letter misrepresented (1) its practices for collecting U.S. passport numbers from donors who selected a country other than the United States when entering their mailing addresses on online political contribution forms and (2) its practice of manually reviewing political contributions and reaching out to donors who selected United States but input a potential foreign mailing address. Both allegations are false.

Attached, please find a white paper documenting the operation of ActBlue's platform in 2023, including the results of a thorough forensic review of ActBlue's political contribution data. These facts validate that ActBlue's November 2023 letter accurately described ActBlue's practices. Among other findings, the data disproves the allegation that ActBlue failed to collect passport numbers from donors who selected a country other than the United States and paid using a third-party payment processor: To the contrary, in 2023, ActBlue collected passport numbers at a *higher* rate for Apple Pay, Google Pay, and PayPal contributions than for credit card transactions. The facts also confirm that ActBlue accurately described its practice of manually reviewing contributions and reaching out to donors who were identified as having entered a foreign address despite having selected the United States as their country. The data indicates that ActBlue collected information to support the conclusion that at least 99.99% of the political contribution dollars it processed in 2023 came from likely U.S. citizens.

Chairmen Jordan, Comer, and Steil
September 12, 2026
Page 2

These findings confirm that there is no basis for the Committees to repeat the false allegation that ActBlue's November 2023 letter was misleading. We appreciated the opportunity to brief the staff of the Committees on these findings yesterday. I would welcome the opportunity to engage with the Committees to answer any further questions they may have regarding our analysis.

Sincerely,

A handwritten signature in dark ink, appearing to read 'R. Machen', followed by a horizontal line extending to the right.

Ronald C. Machen

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**ActBlue’s November 2023 Letter To Congress Accurately Described Its
Robust Vetting Of Contributions By Americans Overseas**

I. Executive Summary

For nearly three years, ActBlue has responded to investigations by the House Administration, Judiciary, and Oversight and Government Reform Committees of the U.S. House of Representatives. ActBlue has provided information on how ActBlue’s platform, policies, and practices have expanded ordinary Americans’ ability to participate in the democratic process while protecting the integrity of the U.S. campaign finance system. ActBlue has produced thousands of pages of documents and provided detailed information about topics of interest to the Committees, including ActBlue’s measures designed to ensure that only U.S. citizens and lawful permanent residents (“LPRs”) make political contributions through the platform.

On November 27, 2023, ActBlue wrote to the Committee on House Administration to describe ActBlue’s robust, multilayered process for confirming the permissibility of contributions and preventing fraudulent transactions.¹ Although contributions by Americans overseas are an infinitesimally small percentage of the political contributions processed by the platform, in that letter ActBlue described the various steps it took to vet contributions made from American servicemembers, students, and others living outside the United States.

In an April 2026 [staff report](#), the Committees, relying on a *New York Times* [article](#) claimed that ActBlue’s letter “impermissibly misrepresented” its compliance practices. According to the Committees, ActBlue did not request passport information for transactions from foreign addresses that were paid through third-party payment processors, like Apple Pay. The Committees also claimed that ActBlue failed to reach out to certain donors with foreign addresses to request passport information.

ActBlue’s November 2023 letter was accurate, and a comprehensive review of contribution data and documentary record confirms that accuracy. ActBlue did what it said it was doing. The November 2023 letter accurately described ActBlue’s policies and practices for collecting passport numbers from donors who entered a foreign address.

¹ [Letter](#) from Regina Wallace-Jones, CEO, ActBlue, to Rep. Bryan Steil, Chairman, Committee on House Administration (Nov. 27, 2023).

Specifically, the data shows that:

- **Foreign-address contributions were vanishingly rare.** In 2023, donors using a foreign address accounted for only 0.13% of the political contribution dollars that ActBlue processed overall. In other words, 99.87% of political contributions on ActBlue came from addresses inside the United States.
- **ActBlue’s policy in 2023 was to require a U.S. passport number from donors who resided abroad before processing a political contribution.** 99.99% of political contributions that ActBlue processed in 2023 came from donors who provided either a United States address or passport number. Foreign-address contributions for which a passport number was not collected in the same transaction amounted to roughly 0.01% of political contribution dollars processed by ActBlue in 2023.
- **ActBlue’s online platform collected passport numbers from donors who selected a country other than the United States, regardless of the payment method used.** Throughout 2023, passport numbers were collected more often for contributions made through third-party payment processors like Apple Pay than for those made by credit cards. This fact refutes a key premise of the allegation that the November 2023 letter was misleading—*i.e.*, that ActBlue did not collect passport numbers for contributions made through third-party payment processors.
- **ActBlue’s compliance team proactively searched for the tiny subset of contributions for which the donor selected “United States” but also provided a potential foreign address.** In the rare instances in which such contributions were identified, ActBlue contacted the donors to request their passport numbers as described in the November 2023 letter. This practice refutes another key premise of the Committees’ allegation that the November 2023 letter was misleading—*i.e.*, that ActBlue did not manually review and conduct outreach to such donors.

II. Background: ActBlue’s Platform & Its Cooperation With Congress

A. ActBlue’s Platform Was Designed To Enable Political Participation And To Protect The Electoral System

ActBlue is a nonprofit organization whose mission is to enable ordinary Americans to exercise their First Amendment rights to participate in the political process by supporting progressive candidates, campaigns, and causes with small-dollar donations. In furtherance of this mission, ActBlue operates an online fundraising platform that serves as a conduit for individuals to support campaigns and causes of their choosing. In 2023, Americans used ActBlue to give more than \$1.12 billion; the average contribution was approximately \$35. This figure included over 32 million separate political contributions from more than 3 million unique

donors, who together gave nearly \$990 million to more than 16,000 candidates and campaigns at all levels of the U.S. political system.²

Americans have a First Amendment right to participate in the U.S. political process by making campaign contributions to support the candidates and causes of their choosing. Americans do not forfeit this right when they go abroad. Accordingly, federal law permits U.S. citizens and LPRs to make political contributions regardless of where they are located or living at the time of the donation.³ This includes U.S. military servicemembers posted at a foreign base, students studying abroad, U.S. diplomats working in embassies, Americans working in foreign countries, or U.S. citizens who have retired to another country.

For more than two decades, ActBlue has sought to enable Americans to participate in the democratic process while maintaining a multilayered security and compliance program to protect the U.S. campaign finance system from unlawful donations. For instance, ActBlue contribution pages list eligibility criteria and require donors to affirm that they meet such criteria before a contribution can be processed—including that they are U.S. citizens or LPRs. As ActBlue explained in its November 2023 letter, it also maintains robust technical controls and compliance processes designed to detect fraud and to ensure that donors provide accurate information. These controls included an industry-leading fraud-detection tool that screened more than 140 behavioral signals, an Address Verification Service, a rules-based processor block, and Payment Card Industry Data Security Standard (PCI DSS) Level 1 certification, which reflects adherence to the most rigorous industry standards for protecting payment card data.

Among the information ActBlue requires of donors is that they provide their mailing address, either when filling out a contribution form or when setting up an ActBlue Express account. In November 2023, ActBlue permitted U.S. citizens living abroad to make political contributions using a foreign mailing address, on the condition that they provided a U.S. passport number. In this way, ActBlue afforded Americans living abroad the opportunity to exercise their First Amendment rights. In 2023, ActBlue implemented this policy by presenting a passport number field whenever a donor selected a country other than the United States on an ActBlue contribution form or during the ActBlue Express Account setup process. The passport number field was a “required” field, meaning that the contribution form or Express Account setup form involving a country other than the United States could not be submitted without completing the passport number field.

By November 2023, ActBlue had also enabled donors to make political contributions using several different payment methods. After providing identity and employment information,

² Of the \$1.12 billion in contributions processed by ActBlue in 2023, approximately \$990 million was directed to candidates and campaign committees, with the remainder directed to 501(c)(3) and 501(c)(4) organizations.

³ See 52 U.S.C. § 30121(b)(2).

donors could choose to contribute using a credit card, Apple Pay, Google Pay, PayPal, or Venmo. Donors with an ActBlue Express Account also had the option to use payment methods saved to their profiles.

B. ActBlue Provided Congress With Accurate Information In Its November 2023 Letter About Its Donor Verification Policies And Procedures

On October 31, 2023, the Committee on House Administration sent a letter to ActBlue, requesting answers to five questions regarding its “donor verification policies and procedures,” in light of “allegations ... that malicious actors ha[d] used ActBlue’s systems” to make fraudulent or unlawful political contributions.⁴ The Committee’s letter asked several questions, including, as relevant here, an inquiry about ActBlue’s processes for vetting donors:

“Federal law imposes many restrictions on political committees, including those that ultimately receive contributions through conduit platforms like ActBlue. Those committees are responsible for ensuring any contributions they accept comply with law. Even though these responsibilities are not imposed on ActBlue, does ActBlue nevertheless take any voluntary steps to ensure that only real persons are able to make contributions to political committees that use ActBlue’s platform?”

ActBlue responded in a letter dated November 27, 2023. ActBlue’s general counsel drafted the letter with input from, and multiple rounds of fact-checking review by, subject-matter experts across ActBlue’s legal, product, engineering, compliance, and communications functions. Before submission, ActBlue’s now-former outside counsel at Covington & Burling LLP also reviewed the letter. After the lawyers and experts had signed off, ActBlue CEO Regina Wallace-Jones signed the letter on behalf of the organization.

The November 2023 letter described numerous aspects of ActBlue’s fraud-prevention tools and compliance processes. Among other things, the letter described ActBlue’s collection of passport numbers when a donor selects a country other than the United States in providing a mailing address. The letter further described ActBlue’s practice of reviewing contributions for the possibility that the donor provided a foreign mailing address but erroneously selected the United States and contacting such donors to request U.S. passport information.

Since the submission of the November 2023 letter, ActBlue has continued to cooperate with requests from the House of Representatives, including by making eleven document

⁴ [Letter](#) from Rep. Bryan Steil, Chairman, Committee on House Administration, to Regina Wallace-Jones, CEO, ActBlue (Oct. 31, 2023).

productions comprising more than 8,000 pages, meeting with the Committees on at least five occasions, and providing other detailed written responses to questions.⁵

On April 2, 2026, the *New York Times* published an article alleging that the November 2023 letter may have inaccurately described ActBlue's practices for collecting passport numbers and conducting donor outreach.⁶ In reporting these allegations, the *Times* cited a privileged legal memorandum, purportedly written in February 2025 by ActBlue's former outside counsel.⁷ The *Times* did not purport to investigate the actual operation of ActBlue's platform, and the article cites no ActBlue document or interview with any current or former ActBlue employee concerning the platform's passport number collection or donor outreach practices in November 2023. Nor does the article describe what due diligence, if any, ActBlue's former outside counsel purported to have conducted before writing the memorandum. In other words, the article rested on a foundation that has never been tested against the actual facts.

On April 20, 2026, an interim staff report by the Committees recapitulated the allegations in the *Times* article.⁸

III. ActBlue Accurately Described How It Collected Passport Numbers

A thorough review of ActBlue's contribution data and the documentary record demonstrates that ActBlue's November 2023 letter was accurate. The Committees' allegations do not stand up to scrutiny. The reason is straightforward: Those allegations were never grounded in an actual examination of how ActBlue's platform operated.

⁵ [Letter](#) from ActBlue Counsel to Rep. Bryan Steil, Chairman, House Committee on Administration, Rep. Jim Jordan, Chairman, House Committee on the Judiciary & Rep. James Comer, Chairman, House Committee on Oversight and Government Reform (June 9, 2025).

⁶ Epstein & Goldmacher, [ActBlue May Have Misled Congress](#), N.Y. Times (Apr. 2, 2026).

⁷ ActBlue continues to assert its attorney-client privilege over the Covington & Burling LLP memoranda, which appear to have been provided to the *Times* by a disgruntled former employee who was not authorized to disclose them. Accordingly, ActBlue has not—and will not—comment on the content of the memoranda. ActBlue has demanded that the *Times* return or destroy the materials.

⁸ [Interim Staff Report](#) of the House Committee on Administration, House Committee on the Judiciary & House Committee on Oversight and Government Reform (Apr. 20, 2026).

A. ActBlue’s 2023 Letter To Congress Accurately Explained That It Collected Passport Numbers When Donors Selected A Country Other Than The United States

ActBlue’s November 2023 letter gave this accurate description of how its platform prompted donors who provided a foreign mailing address to provide a U.S. passport number before a contribution form could be processed:

“Passport information is required from donors providing an address outside of the United States. When a donor selects any country other than the United States on an ActBlue contribution form, a United States passport number field appears. Only donations with passport information are processed.”

The interim staff report, quoting the *Times*, made the following allegation regarding ActBlue’s statement:

“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.’”

That allegation is false. Just as it wrote to the Committee in November 2023, ActBlue did in fact ask donors who paid through third-party payment apps for passport information before contributions were processed. The contribution data proves it—irrefutably.

B. Forensic Examination Of Contribution Data Confirms That Passport Numbers Were Collected For Foreign-Address Contributions Regardless Of Payment Type

In 2023, ActBlue processed nearly **\$990 million in total political contributions** from more than **3 million unique donors**. Of these, contributions for which donors selected a country other than the United States and provided a foreign address totaled only **\$1.3 million**. That is, contributions from a donor with a foreign mailing address accounted for only **0.13%** of the amount of political contributions that ActBlue processed in 2023. **99.87%** of the total donation amount processed by ActBlue in 2023 came from addresses inside the United States.⁹

Significantly, even among the 0.13% of donations from foreign addresses, ActBlue implemented strong controls to assess the permissibility of those contributions. Of the \$1.3

⁹ Foreign-address contributions are defined as contributions where the ‘donor_country’ field contains a value other than ‘united states’, ‘us’, ‘america’, ‘puerto rico’, ‘pr’, ‘american samoa’, ‘samoa’, ‘us virgin islands’, ‘virgin islands, us’, ‘guam’, ‘northern mariana islands’, ‘n mariana islands’, or ‘saipan’, and exclude any contributions where the ‘donor_address’, ‘donor_city’, ‘donor_state’, ‘donor_zip’, and/or ‘donor_country’ fields correspond to a US address, territory, or military mail address designation.

million in 2023 foreign-address contributions ActBlue processed, donors provided a passport number at the time of contributing (either on the contribution form or via an ActBlue Express Account) for all but **\$91,316** in contributions. This means that ActBlue collected a passport number at the time of contribution for approximately 93% of foreign-address contribution dollars. The funds raised through foreign-address contributions that did not provide a passport accounted for just **0.01%** of the total amount of political contributions that ActBlue processed overall in 2023. In other words, **99.99%** of 2023 contributions through ActBlue came either from donors inside the U.S. or from donors outside the U.S. who had provided a passport number.

Breaking these 2023 foreign-address contributions down by the payment method used demonstrates that the criticism about contributions paid via third-party apps is fundamentally incorrect. If it were correct that “donors who paid through third-party apps like Apple Pay, PayPal or Venmo were not asked for passport information,” then passport number collection rates would be zero—or at least significantly lower—for contributions processed using those third-party payment apps.

But the opposite is true. ActBlue’s political contribution data reflects that passport numbers were collected at consistently high rates across every payment method, including third-party apps. In fact, in 2023 passport numbers were collected at a slightly *higher* rate for funds processed through foreign-address contributions via Apple Pay (99.7%), Google Pay (99.8%), and PayPal (94.9%) than for foreign-address contributions processed via credit cards (92.3%).¹⁰ These statistics do not merely undermine the Committees’ allegation—they refute it entirely. ActBlue’s November 2023 letter was accurate.

C. Most Donors Associated With The \$91,316 In 2023 Foreign-Address Contributions For Which Passport Numbers Were Not Collected In The Same Transaction Had Other Strong Indicia Of Eligibility

Significantly, ActBlue data also reflects that there were strong indicia of eligibility for the vast majority of the **\$91,316** in foreign-address contributions that were processed in 2023 without a passport number. Even among that remaining 0.01%, the overwhelming majority is attributable to identifiable U.S. donors: donors who supplied a U.S. passport number at another time, donors who used a U.S. address when making another contribution, and other likely U.S. citizens. The remaining donors are responsible for just 0.001% of total contribution dollars, well below any materiality threshold.

¹⁰ Only one foreign-address contribution was processed by Venmo in 2023, and it had an associated passport number. As explained further below, the vast majority of the already small volume of 2023 foreign-address contributions processed without an associated passport number were associated with donors who provided ActBlue a passport number or domestic address in connection with another contribution.

- For more than 75% of these funds (\$68,995), the same donor provided a U.S. passport number to ActBlue in connection with another contribution.
- For another 13% of these funds (\$12,253), the same donor provided a U.S. address to ActBlue in connection with another contribution.

As a result, in 2023 there was only **\$10,068** in foreign-address political contributions for which ActBlue did not collect passport information and there were no other indicia of the donor's eligibility (other than the donor's affirmation on the contribution form that they were eligible to donate as a U.S. citizen or LPR). This amounts to just 0.001% of the nearly \$990 million that ActBlue processed for political candidates and campaigns in 2023.¹¹ This data further confirms that the November 2023 letter was accurate in stating that ActBlue required donors who selected a country other than the United States to supply passport numbers before the contribution would be processed.¹²

D. ActBlue's Forensic Examination Validates Its 2023 Description Of Its Passport Number Collection Practices

ActBlue's November 2023 letter to Congress accurately stated that its platform was configured to require donors who selected a country other than the United States to provide a U.S. passport number before a political contribution could be processed. Contrary to recent criticism, this requirement applied to—and was enforced for—political contributions regardless of the payment method that the donor selected.

ActBlue's forensic review of 2023 contribution data confirms these facts. Out of nearly \$990 million in 2023 political contributions, ActBlue collected either a domestic address or a passport number in connection with 99.99% of political contribution dollars. ActBlue's forensic review identified only \$91,316 in 2023 political contributions that were processed with a foreign address but no passport number out of \$1.3 million in total foreign-address contributions that year. Of that \$91,316 in foreign-address contributions, the vast majority (almost 90%) were made by donors who either provided a passport number or a domestic address when they made

¹¹ Together, this \$10,068 and the \$12,253 in contributions from donors who used a U.S. address on another contribution comprise the \$22,321 in 2023 contributions (from 139 unique donors) for which no passport number was ever collected. *See* n. 12.

¹² Like any payment system handling tens of millions of transactions annually, nothing will ever occur 100% of the time. With respect to the *de minimis* number of donors who made a 2023 political contribution using a foreign address without ever providing ActBlue a passport number (139 unique donors who made 2023 contributions totaling \$22,321), the forensic review found this primarily occurred due to either (1) recurring contributions (*i.e.*, subscriptions) initiated using a foreign address before 2020, when the passport number collection function was added to ActBlue's platform, or (2) contributions made by a donor who set up an ActBlue Express Account before 2020 using a foreign address.

another ActBlue contribution. This record confirms that ActBlue accurately described its policy and practice in its November 2023 letter to Congress.

IV. ActBlue Accurately Described Its Donor Outreach Process

A. ActBlue’s 2023 Letter To Congress Accurately Described The Process By Which Its Compliance Team Identified The Extraordinarily Rare Cases In Which Donors Provided A Foreign Address But Selected “United States” As Their Country

ActBlue’s November 2023 letter accurately described a process by which ActBlue’s compliance team identified and reached out to donors who had selected “United States” as their country but nevertheless entered a potential foreign address, based on the mailing address fields on the contribution form:

“Contributions are reviewed for the possibility that a donor provided a foreign address even if the donor selected the United States as their country. Contributions that indicate a foreign country in the address information are set aside for manual review. If a contribution appears to be from a foreign address, ActBlue contacts the donor to request United States passport information. The contribution is refunded if we are unable to make contact with the donor.”

The Committees’ interim staff report, again citing the *Times*, alleged that this statement was false in two respects:

“Wallace-Jones claimed that ‘if a contribution appears to be from a foreign address, ActBlue contacts the donor to request United States passport information.’ This, too, ‘did not always happen,’ according to ActBlue’s own outside counsel. ... Wallace-Jones wrote that ‘contributions that indicate a foreign country in the address information are set aside for manual review.’ Contemporaneous documents produced to the Committees indicate that contributions from approximately 170 countries were not manually reviewed, contradicting Wallace-Jones’s claim.”

Those allegations are false. A review of ActBlue’s contribution data and compliance team records validates the November 2023 letter’s description of this process. At the time, ActBlue’s compliance team manually reviewed contributions for foreign-address indicia even where the donor had selected the United States and contacted donors for contributions where a foreign address was identified.

B. Forensic Examination Of ActBlue Contribution Data Demonstrates How Rarely Donors Provided A Foreign Address

To identify contributions for manual review, the ActBlue compliance team's practice was to periodically obtain spreadsheets containing details of political contributions with address data containing the names of foreign countries and cities, even though the donor had selected "United States" as the country. These reports often contained more than 1,000 entries, but nearly all were false positives (*e.g.*, London Drive; Lebanon, PA; Paris, TX). ActBlue's compliance team manually reviewed these reports to identify apparent foreign addresses for individual donor outreach.

An intensive forensic review of ActBlue's contribution data confirms that the issue this donor outreach process sought to address was an extremely rare occurrence. For instance, of the approximately 1.9 million unique addresses for which the donor selected "United States" in Q4 2023, the forensic review identified only 36 donors who input a foreign address, and they made contributions in Q4 2023 totaling only \$3,136 (Figure 1). Accordingly, the manual outreach process that ActBlue accurately described in its November 2023 letter applied to a vanishingly small set of contributions. Nevertheless, the documentary record proves that the compliance team undertook significant efforts to find the foreign addresses associated with the 0.001% of contribution dollars for which the donor selected "United States."¹³

¹³ Of those 36 donors identified by the forensic review, 21 provided ActBlue a passport number, either in connection with a prior contribution or in response to ActBlue's outreach, or had their contributions refunded. Another 5 donors, who together gave just \$339 in Q4 2023, used a domestic address on another contribution. The remaining 10 donors gave a total of just \$963 in Q4 2023, and it appears that the compliance team's screening process did not identify these addresses as foreign at the time.

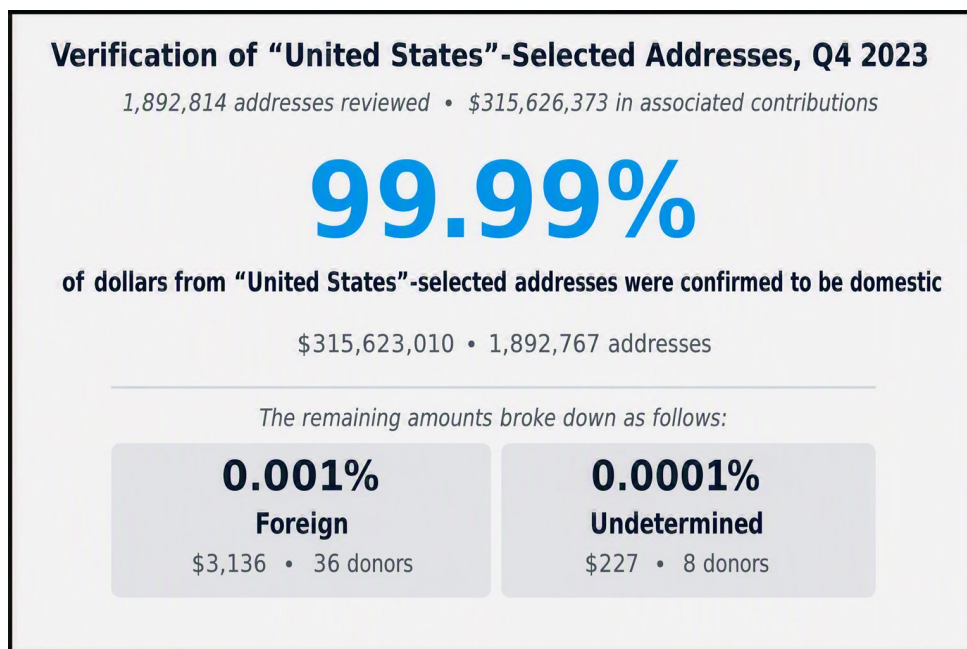


Figure 1. Forensic verification of "United States"-selected addresses, fourth quarter 2023. Source: independent analysis using postal, census, and commercial address-verification data, primarily relying on city, state, ZIP combinations, plus manual review.

C. Contemporaneous Documents Prove That ActBlue Carried Out The Donor Outreach Process It Described In The November 2023 Letter

The contemporaneous documentary record reflects numerous outreach emails to donors that the compliance team sent as part of the process described in the November 2023 letter. For example, Figure 2 below is an example of one of these emails. It was sent by a member of the compliance team to a donor who had selected United States, but entered an address in Frejus, France. The donor responded the next day and provided a passport number.



Figure 2. Example of compliance team donor-outreach email. AB-House-004162.

ActBlue's practice when it received updated address or passport number information was to attach the identified contribution(s) and additional information to an ActBlue Express Account profile for the donor.

As the November 2023 letter described, if the compliance team was unable to contact a donor, its policy was to refund the contribution. Figure 3 is an example of an email to a donor who selected "United States" when making two contributions on October 24, 2023 for \$100 and \$10 but input an address in Cervera, Spain. The compliance team emailed the donor at least three times in October and November 2023 for passport information and received no response. Compliance records subsequently reflect a decision to refund these contributions. ActBlue's forensic review confirmed that these contributions were refunded.

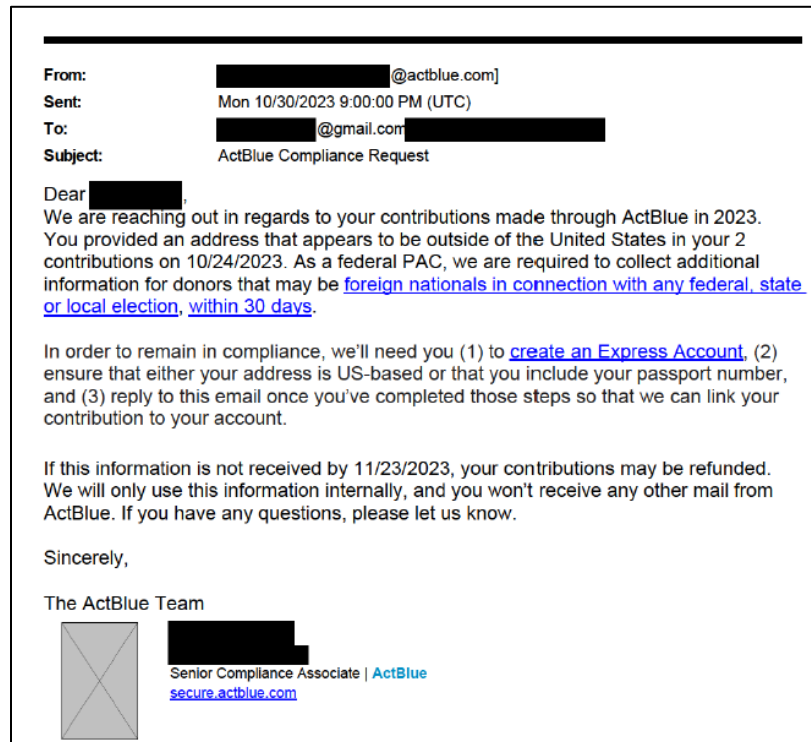


Figure 3. Example of compliance team donor-outreach email followed by refund where the donor did not respond. AB-House-004161.

The contemporaneous communications from the months just before ActBlue’s November 2023 letter to the Committee confirm that the letter accurately described ActBlue’s existing practices.

D. The House Committees Mischaracterize Multiple, Complementary Safeguards Implemented By ActBlue To Ensure Contribution Integrity On The Platform

The Committees’ interim staff report also criticized the donor outreach statement in ActBlue’s November 2023 letter because “documents produced to the Committees” reflected that contributions associated with a select set of 28 countries were automatically rejected or set aside for manual review, while contributions with addresses in other countries were not automatically blocked. However, this criticism mistakenly conflates two separate transaction monitoring efforts meant to address two separate issues. As the November 2023 letter states, ActBlue maintained a “rules-based fraud prevention system” that analyzed payments in real time and would “block[]” any “contribution... if it d[id] not meet the standards of those rules.” One of those rules was a block on payments that appeared to have certain links to a discrete set of

high-risk countries.¹⁴ In other words, payments from those high-risk countries were blocked or reviewed even if a U.S. citizen making the contribution provided their U.S. passport number.

That block was a separate safeguard from the donor outreach process, which was described in the November 2023 letter, and designed to obtain passport information from donors who had erroneously selected “United States” as country of residence and then entered a foreign mailing address on the contribution form.

E. ActBlue’s November 2023 Description Of Its Donor Outreach Was Accurate

ActBlue’s November 2023 letter accurately described its compliance team’s effort to address the *de minimis* set of contributions (roughly 0.001%) that involved a foreign address incorrectly entered when the donor selected the United States as their country. ActBlue’s robust compliance processes exemplify the organization’s commitment to not only expanding access to the democratic process for small-dollar donors but to protecting the integrity of the U.S. campaign finance system from unlawful political contributions. Any suggestion that the description of these processes was somehow false—based on no independent review of the actual facts—is unfounded.

V. Conclusion: ActBlue Did Not Mislead Congress

ActBlue told Congress the truth in its November 2023 letter. The suggestion otherwise—first reported by the *New York Times* and later repeated by the Committees—rests on numerous false premises asserted without performing a meaningful review of the facts. It is, at bottom, an accusation manufactured from incomplete information and advanced without the rigor that so serious an allegation demands.

ActBlue’s transaction data confirms that foreign-address contributions were an extremely small share of the overall contribution volume—just 0.13%. And it proves that, even with respect to that tiny population of foreign-address contributions, ActBlue collected passport numbers for 93% of the contributions. Significantly, on the rare occasions when passport numbers were not collected, there is strong evidence that many of those contributions were made by eligible donors. In 2023, ActBlue collected information indicating likely eligibility for donors responsible for 99.99% of total contribution dollars.

The documentary record also substantiates ActBlue’s November 2023 statement that it systematically sought to identify the vanishingly small set of contributions where donors selected

¹⁴ The Committees’ cited exhibit confirms that this country list was part of ActBlue’s fraud-prevention rules rather than its donor-outreach process. See [Interim Staff Report of the House Committee on Administration, House Committee on the Judiciary & House Committee on Oversight and Government Reform](#) (Apr. 2, 2025), Ex. 1 at p.27.

“United States” on the contribution form but appeared to enter a foreign address, and that ActBlue followed up by reaching out to donors when it identified those rare instances.

The Committees’ criticism of ActBlue’s statements rests entirely on a news report, which itself rested on faulty assumptions and inaccurate information. These criticisms are not grounded in any meaningful review of the facts underlying the statements in ActBlue’s November 2023 letter. A comprehensive forensic review demonstrates that ActBlue accurately described its robust, multilayered systems for vetting contributions associated with foreign addresses. Any suggestion that ActBlue misled Congress is divorced from reality. It cannot be reconciled with the documentary record, and it should not be credited.