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One Hundred Eighteenth  
Congress of the United States  
House of Representatives

COMMITTEE ON HOUSE ADMINISTRATION  
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October 17, 2024

The Honorable Christopher A. Wray  
Director  
Federal Bureau of Investigations  
935 Pennsylvania Ave NW  
Washington, DC, 20535

Dear Director Wray:

As Chairman of the Committee on House Administration (“CHA”) and as the Ranking Member of the Senate Permanent Subcommittee on Investigations (“PSI”), both with broad oversight of our nation’s federal elections<sup>1</sup>, we write to you to raise an urgent concern regarding potential illicit election funding by foreign actors. CHA has been investigating claims that foreign actors, primarily from Iran, Russia, Venezuela, and China, may be using ActBlue<sup>2</sup> to launder illicit money into U.S. political campaigns. The investigation has indicated that these actors may be exploiting existing U.S. donors by making straw donations without their knowledge.

Similarly, as Ranking Member of PSI, Senator Johnson wrote to the Federal Election Commission (“FEC”) in April 2023 regarding a video posted online by the O’Keefe Media Group on March 28, 2023 alleging that political donations are being made in large amounts to certain political groups without the donors’ knowledge.<sup>3</sup> The FEC refused to confirm or deny whether it is investigating this matter.

During CHA’s investigation, evidence has emerged pointing to illegal donations being broken into many smaller donations made in the name of existing ActBlue donors without their knowledge. This practice is known as “smurfing,” where illicit actors use prepaid debit, credit, or gift cards in the names of legitimate donors to make straw donations that are virtually impossible to detect.

In October 2023, CHA sent a letter to ActBlue inquiring how it prevents contributions from foreign sources, and whether it requires the card verification value (“CVV”) associated with the credit or debit card used by the contributor when making an online contribution.<sup>4</sup> ActBlue responded, explaining that it did not require contributors to provide their CVV when making an

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<sup>1</sup> Rules of the United States House of Representatives, Rule X(k)(12).

<sup>2</sup> ActBlue is a political action committee and operates as a conduit for most Democratic candidates and committees, which means donations made through ActBlue are considered individual donations to these other groups.

<sup>3</sup> Letter from Ron Johnson, Ranking Member, Permanent Subcomm. on Investigations, to Dara Lindenbaum, Chair, Federal Election Commission, et al., Apr. 17, 2023, <https://www.ronjohnson.senate.gov/services/files/6D1654EF-A0B0-4314-A1FA-F47C4178C68D>.

<sup>4</sup> Comm. on H. Admin., 118<sup>th</sup> Cong., Letter to ActBlue (Oct. 31, 2023), [4922D896A967959D5BC6530F6615E9B9.actblue-letter-final-78-.pdf \(house.gov\)](https://www.house.gov/committees/admin/4922D896A967959D5BC6530F6615E9B9.actblue-letter-final-78-.pdf).

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online contribution.<sup>5</sup> This failure to verify donor identity may have allowed foreign actors to fraudulently participate in the political process in the U.S.

Following this concerning information, CHA sent a letter to the FEC requesting it immediately initiate an emergency rulemaking process to require political campaigns to verify the CVV of donors who contribute online and a rulemaking to prohibit political committees from accepting online contributions from gift cards or credit and debit cards.<sup>6</sup> CHA also introduced H.R. 9488, the Secure Handling of Internet Electronic Donations Act (“SHIELD Act”), that would prohibit political committees like ActBlue from accepting online contributions from debit or credit cards without the disclosure of the CVV and billing address associated with the card. The legislation would prohibit the acceptance of contributions from gift cards, pre-paid credit or debit cards, or gift certificates. The bill also would adopt a bipartisan legislative recommendation from the FEC to prohibit individuals from knowingly aiding or abetting someone that makes a contribution in the name of another person.

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

Disturbingly, when Ranking Member Johnson asked you during a September 25, 2024 secure briefing about election security what the FBI was doing to investigate smurfing, you seemed clueless on the issue and had no idea if the FBI was doing anything to investigate it. The other briefers—Director of National Intelligence Avril Haines and Cybersecurity and Infrastructure Security Agency Director Jen Easterly—remained silent.

Based on the evidence gathered, CHA referred this matter to several state Attorneys General for further investigation, including those in Arkansas, Florida, Missouri, Texas, and Virginia.<sup>7</sup> Additionally, we have consulted with experts in money laundering, terrorism finance, and credit card processing to better understand how these foreign actors may be exploiting our political donation systems.

In light of these findings, CHA and PSI request a classified briefing on the FBI’s findings concerning potential election interference through fraudulent donations by foreign actors. We

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<sup>5</sup> Regina Wallace-Jones, CEO of ActBlue, Letter to the Comm. on H. Admin., 118<sup>th</sup> Cong., (Nov. 27, 2023), [FEE0032E48BFF011537DA5927F7E9298.response-to-house-admin-committee-11-27-23.pdf](https://www.house.gov/committees/admininst/ce/000001/000001/000001/000001/FEE0032E48BFF011537DA5927F7E9298.response-to-house-admin-committee-11-27-23.pdf).

<sup>6</sup> Comm. on H. Admin., 118<sup>th</sup> Cong., Letter to the FEC (Aug. 5, 2024), [AD4186C84F88B81763B784FFFAAA5938.fec-rulemaking-request-letter.pdf](https://www.house.gov/committees/admininst/ce/000001/000001/000001/000001/AD4186C84F88B81763B784FFFAAA5938.fec-rulemaking-request-letter.pdf) (house.gov).

<sup>7</sup> Comm. on H. Admin., Chairman Steil Announces Referrals to Attorneys General in ActBlue Investigation, 118<sup>th</sup> Cong. (Sep. 19, 2024), <https://cha.house.gov/press-releases?ID=D3B2B5D7-5603-40D6-9DDE-5148A331B76D>.

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request that the FBI examine and report any evidence or intelligence that links foreign actors, particularly from Iran, Russia, Venezuela, and China, to efforts to exploit U.S. political fundraising systems. We are particularly interested in any relevant investigations or intelligence involving ActBlue and other similar platforms regarding the use of prepaid debit, credit, and gift cards to facilitate these activities. Given the potential threat this poses to the integrity of federal elections, we request that the FBI contact CHA by close of business October 18, 2024, to schedule a briefing for no later than October 30, 2024.

Please contact Rachel Collins, Deputy General Counsel for the Committee on House Administration, at [Rachel.Collins@mail.house.gov](mailto:Rachel.Collins@mail.house.gov) to arrange the briefing.

Sincerely,



Bryan Steil  
Chairman  
Committee on House Administration



Ron Johnson  
Ranking Member  
Senate Permanent Subcommittee on  
Investigations