

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND ACCOUNTABILITY

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WASHINGTON, DC 20515-6143

MAJORITY (202) 225-5074
MINORITY (202) 225-5051

<https://oversight.house.gov>

September 20, 2024

The Honorable Janet Yellen
Secretary
U. S. Department of the Treasury
1500 Pennsylvania Ave. NW
Washington, D.C. 20220

Dear Secretary Yellen:

The Committee on Oversight and Accountability is investigating reports of potentially fraudulent and illicit financial activity related to contributions to campaigns of candidates for federal offices mediated by online fundraising platforms like ActBlue. The Committee writes to request the U.S. Department of the Treasury (Treasury) make available to the Committee certain Suspicious Activity Reports (SARs) relevant to the Committee's investigation.

Recent reports have raised the specter of fraud and evasion of campaign finance law by individuals exploiting online contribution platforms, especially ActBlue. For example, ActBlue had not implemented standard procedures to guard against identity theft and fraud such as requiring a Card Verification Value (CVV) to process online transactions until it received criticism for not doing so.¹ ActBlue is also being investigated by several states' officials in relation to contributions allegedly made via the platform fraudulently without the reported contributor's awareness.² In Virginia, reports of contribution activity facilitated through the ActBlue platform included "some cases in which single donors made tens of thousands of separate donations worth hundreds of thousands of dollars."³

Federal law prohibits contributions made in the name of another person,⁴ and for good reason. The Committee is concerned that failure to properly vet contributions made through online platforms may have allowed bad actors to more easily commit fraud to illegally exploit and violate federal campaign finance laws. These bad actors could include foreign nationals not lawfully admitted for permanent residence who are prohibited by statute from contributing to

¹ See Charlotte Hazard, *Texas AG Paxton's investigation leads ActBlue to require CVV codes when people make donations*, JUSTTHENEWS (Aug. 9, 2024).

² Press Release, Attorney General of Texas, *Attorney General Ken Paxton's Ongoing Investigation Into ActBlue Yields Cooperation On Donor Credit Card Identification* (Aug. 8, 2024); Letter from Jason Miyares, Office of the Attorney General, Commonwealth of Virginia to ActBlue (Aug. 2, 2024); Jeff Victor, *Secretary of State investigating ActBlue Wyoming based on national allegations*, WYOMING PUBLIC RADIO (Aug. 19, 2024).

³ Brady Knox, *Virginia attorney general demands answers about suspected 'dummy accounts' donating to Democrats*, WASH. EXAMINER (Aug. 2, 2024).

⁴ 52 U.S.C. § 30122 ("No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.").

campaigns or political parties.⁵ They could also include individuals looking to flout the limits of individual contributions⁶ by fraudulently using others' identities to evade those limits, in addition to other criminal activity in violation of campaign finance laws.⁷

As Secretary of the Treasury, you are empowered to provide information obtained through SAR filings to congressional committees upon written request.⁸ We request certain information to further our investigation into this matter. It is imperative that Congress determine whether legislation is necessary to ensure adherence to statutes related to campaign finance, and guard against foreign or unfair influence in our elections.

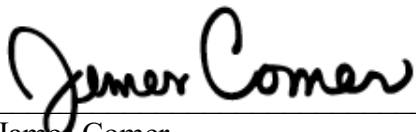
To assist the Committee's investigation in this matter, we request access to the following SARs as soon as possible but no later than October 4, 2024:

All SARs filed or relating to transactions occurring on or after January 1, 2023, to the present, containing the term "ActBlue", which relate to money laundering, counterfeit credit/debit card, credit card or debit card fraud, false statements, wire transfer fraud, or identity theft.

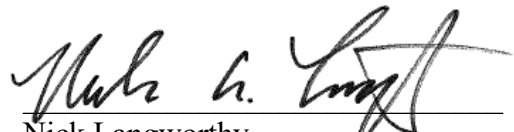
An attachment to this letter provides additional instructions for responding to the Committee's request. To arrange for the delivery of documents or to ask any follow-up questions, please contact Committee on Oversight and Accountability Majority staff at (202) 225-5074.

The Committee on Oversight and Accountability is the principal oversight committee of the U.S. House of Representatives and has broad authority to investigate "any matter" at "any time" under House Rule X. Thank you in advance for your cooperation with this inquiry.

Sincerely,



James Comer
Chairman
Committee on Oversight and Accountability



Nick Langworthy
Member of Congress

⁵ See 52 U.S.C. § 30121 (prohibiting certain contribution activity related to campaigns by foreign nationals who have not been lawfully admitted to the United States for permanent residence).

⁶ See 52 U.S.C. § 30116 (setting forth limitations on contributions and expenditures); see also Federal Election Commission, *Contribution limits*, available at <https://www.fec.gov/help-candidates-and-committees/candidate-taking-receipts/contribution-limits/>.

⁷ See e.g. Federal Election Commission, *Who can and can't contribute*, available at <https://www.fec.gov/help-candidates-and-committees/candidate-taking-receipts/who-can-and-cant-contribute/>.

⁸ 31 C.F.R. § 1010.950(c) ("The Secretary may make any information set forth in any report received pursuant to this chapter available to the Congress, or any committee or subcommittee thereof, upon a written request stating the particular information desired, the criminal, tax or regulatory purpose for which the information is sought, and the official need for the information.").



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Chairman
Subcommittee on National Security,
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Pete Sessions
Chairman
Subcommittee on Government
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Workforce



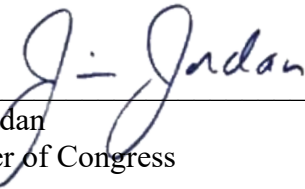
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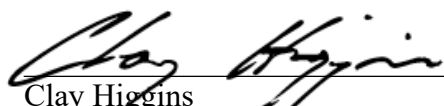
Virginia Foxx
Member of Congress



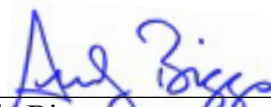
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Gary Palmer
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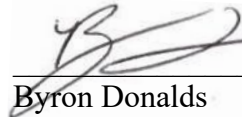
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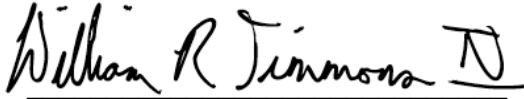
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Jake LaTurner
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Byron Donalds
Member of Congress



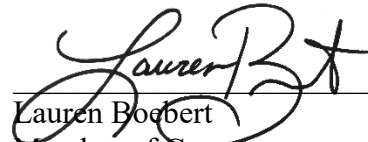
William Timmons
Member of Congress



Tim Burchett
Member of Congress



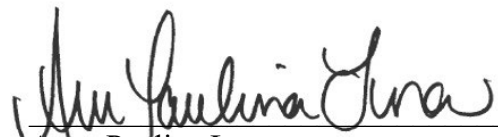
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Anna Paulina Luna
Member of Congress



Eric Burlison
Member of Congress



Michael Waltz
Member of Congress

The Honorable Janet Yellen

September 20, 2024

Page 5 of 5

cc: The Honorable Jamie B. Raskin, Ranking Member
Committee on Oversight and Accountability

The Honorable Robert Garcia, Ranking Member
Subcommittee on National Security, the Border, and Foreign Affairs

The Honorable Kweisi Mfume, Ranking Member
Subcommittee on Government Operations and the Federal Workforce

The Honorable Gerald Connolly, Ranking Member
Subcommittee on Cybersecurity, Information Technology, and Government Innovation

The Honorable Cori Bush, Ranking Member
Subcommittee on Economic Growth, Energy Policy, and Regulatory Affairs

The Honorable Katie Porter, Ranking Member
Subcommittee on Health Care and Financial Services