

Congress of the United States
Washington, DC 20515

September 28, 2026

Mr. Ronald C. Machen
Partner
WilmerHale
2100 Pennsylvania Avenue, NW
Washington, DC 20052

Dear Mr. Machen:

On September 11, 2026, you provided a briefing to the House Administration, Judiciary, and Oversight and Government Reform Committees regarding the accuracy of ActBlue CEO Regina Wallace-Jones's prior statements to Congress about ActBlue's donor and passport collection processes.¹ During the briefing, you asserted that "ActBlue's November 2023 letter accurately described its passport number collection and donor outreach practices, and allegations to the contrary are wrong."² Assertions you made in your briefing—and later repeated in the "white paper" you authored—appear to contradict information in documents in the possession of the Committees. As such, we require your testimony at a transcribed interview before the Committees.

Documents and information available to the Committees indicate that ActBlue broke the law by accepting foreign donations. The Committees have documented this evidence in several reports detailing ActBlue's fundamental unserious approach to fraud-prevention practices.³ Our findings have been confirmed by independent reporting from the *New York Times* and a contemporaneous review by ActBlue's then-outside counsel, former Biden White House Counsel Dana Remus. In late 2024, Ms. Remus examined ActBlue's potential legal liability for its past

¹ Letter from Regina Wallace-Jones, CEO & President, ActBlue, to Rep. Brian Steil, Chairman, H. Comm. on House Administration (November 27, 2023) (on file with the H. Comm. on House Administration).

² Machen, Ronald, WilmerHale ActBlue's November 27, 2023 Letter Accurately Described Its Donor Vetting Practices [Slide Deck], Sept. 11, 2026, on file with the Committees.

³ 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"); see also 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, PART II: ILLICIT FOREIGN DONATIONS AND A COVER-UP SPUR MASS RESIGNATIONS AND FIRINGS ON ACTBLUE'S LEGAL AND COMPLIANCE TEAM (Comm. Print Apr. 20, 2026) (hereinafter "ActBlue Staff Report II"); see also 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, PART III: ACTBLUE'S FAILURE TO PREVENT ILLEGAL FOREIGN POLITICAL CONTRIBUTIONS SPUR MASS RESIGNATIONS AND FIRINGS ON ACTBLUE'S LEGAL AND COMPLIANCE TEAM (Comm. Print Sept. 16, 2026) (hereinafter "ActBlue Staff Report III").

fraud-prevention practices.⁴ Ms. Remus’s review found “a substantial risk that some of the funds” raised for Democrat campaigns and causes by ActBlue “were impermissible contributions from foreign nationals.”⁵

In addition, Ms. Remus’s contemporaneous review found Ms. Wallace-Jones’s representations to the House Administration Committee about ActBlue’s “robust” and “multilayered” fraud-prevention practices and passport verification process to “not . . . be entirely accurate.”⁶ Ms. Wallace-Jones had represented to the House Administration Committee that “only donations with passport information are processed” and that the “contribution is refunded if we are unable to make contact with the donor.”⁷ Ms. Remus found, however, that passport checks “did not always happen” and were never conducted for transactions made through “third-party apps like Apple Pay, PayPal, or Venmo.”⁸ In fact, the Chairwoman of ActBlue’s Board of Directors, Kimberly Peeler-Allen, admitted later in an interview with the *New York Times* 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.”⁹

During the briefing, you conceded that your “forensic” review found that ActBlue processed and accepted donations with foreign indicators even though ActBlue failed to identify a “passport number” or “other indicia of eligibility” for the donor.¹⁰ Nonetheless, you defended Ms. Wallace-Jones’s representations to Congress by arguing that ActBlue’s compliance and vetting policy was “as close to 100 percent as it could be.”¹¹ Documents produced to the Committees undercut your assertion. These documents demonstrate that if a donor did not have a U.S. passport or a U.S. address, an ActBlue employee retained the ability to determine an “alternative method of verifying the [donor’s] citizenship.”¹² This means an ActBlue employee could put “a placeholder,” including “ACTBLUEXX,” “in the passport number field of [the donor’s] ActBlue account.”¹³ The placeholder allows ActBlue to accept all subsequent contributions from the donor without requiring a U.S. passport number.¹⁴

⁴ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

⁵ *Id.* (quoting memoranda).

⁶ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

⁷ Letter from Regina Wallace-Jones, CEO & President, ActBlue, to Rep. Brian Steil, Chairman, H. Comm. on House Administration (November 27, 2023) (on file with the H. Comm. on House Administration).

⁸ Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).

⁹ 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); Josh Christenston, *ActBlue CEO may have “intentionally misled Congress” about foreign donations to Dems: GOP*, N.Y. POST (April 3, 2026).

¹⁰ Machen, Ronald, WilmerHale ActBlue’s November 27, 2023 Letter Accurately Described Its Donor Vetting Practices [Slide Deck], Sept. 11, 2026, on file with the Committees.

¹¹ Briefing with ActBlue counsel and Committee staff (Sept. 11, 2026).

¹² Memorandum from ActBlue, Procedure for Contributions Made Without a Passport Number.

¹³ *Id.*

¹⁴ *Id.*

In addition, your review was artificially limited in time to only 2023 and did not include an examination of donation data for 2024.¹⁵ As such, the review did not accurately represent the totality of ActBlue’s foreign donation vetting and donor outreach practices during the 2024 election cycle. In fact, documents produced to the Committees show that ActBlue relaxed its vetting practices twice in 2024—data that your narrow “forensic” review did not capture.¹⁶

Throughout the briefing, you disputed the accuracy of Ms. Remus’s contemporaneous review and claimed that the reporting from the *New York Times*, based upon her memoranda, could not be trusted.¹⁷ You refused, however, to elaborate on the methodology of your examination or how it differed from Ms. Remus’s contemporaneous review.¹⁸ Contrary to your after-the-fact assertions, documents show that Ms. Remus’s concerns were well-founded and corroborated by statements from ActBlue staff, including former Associate General Counsel Aaron Ting. For example, in his resignation letter, Mr. Ting stated he was resigning due to “ActBlue’s past practices for screening political donations from abroad and its past representations to Congress regarding foreign donations and related matters.”¹⁹ Further, former Legal Counsel Zain Ahmad was so concerned about the contents of Ms. Remus’s memoranda detailing the platform’s misconduct that he sent the documents “to the ActBlue board of directors [and] ActBlue’s executive leadership team[.]”²⁰

Your review appears to be nothing more than an after-the-fact sugarcoating of ActBlue’s misconduct and Ms. Wallace-Jones’s misrepresentations to the House Administration Committee. It is particularly noteworthy that while ActBlue hired you to conduct and then publish an ex-post review—which unsurprisingly concluded that ActBlue did nothing wrong—the platform still refuses to produce to the Committees Ms. Remus’s independent, contemporaneous examination that found a “substantial risk” of foreign contributions on the platform and that Ms. Wallace-Jones’s representations to Congress were not accurate. Moreover, during your briefing, you declined to allow the Committees to conduct an in-depth examination of how you conducted your “forensic” review, including your methodology and any documents you examined to support your conclusions.

For all these reasons, to advance the Committees’ oversight of ActBlue’s fundamentally unserious approach to fraud prevention and misrepresentations to Congress, the Committees require your testimony in a transcribed interview setting. We ask that you schedule the requested transcribed interview as soon as possible, but no later than 5:00 p.m. on October 12, 2026.

¹⁵ Machen, Ronald, WilmerHale ActBlue’s November 27, 2023 Letter Accurately Described Its Donor Vetting Practices [Slide Deck], Sept. 11, 2026, on file with the Committees.

¹⁶ ActBlue memorandum, *Summary of changes made to Sift rules since 2023*.

¹⁷ Briefing with ActBlue counsel and Committee staff (Sept. 11, 2026).

¹⁸ Briefing with ActBlue counsel and Committee staff (Sept. 11, 2026).

¹⁹ 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).

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

Mr. Ronald C. Machen
September 28, 2026
Page 4

Pursuant to the Rules of the House of Representatives, the Committees have jurisdiction to conduct oversight of matters concerning elections, civil liberties, criminal law, and U.S. national security to inform potential legislative reforms.²¹ If you have any questions about this matter, please contact Judiciary Committee staff at (202) 225-6906, Committee on House Administration staff at (202) 225-8281, and Oversight Committee staff at (202) 225-5074.

Thank you for your prompt attention to this matter.

Sincerely,



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 Jamie Raskin, Ranking Member, Committee on the Judiciary

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

The Honorable Robert Garcia, Ranking Member, Committee on Oversight and Government Reform

²¹ Rules of the House of Representatives R. X (K) Committee on House Administration, (L) Committee on Judiciary, (N) Committee on Oversight and Government Reform (2025).