FRAUD ON ACTBLUE, PART III: ACTBLUE'S FAILURE TO PREVENT ILLEGAL FOREIGN POLITICAL CONTRIBUTIONS

Interim Staff Report of the

Committee on House Administration,
Committee on the Judiciary, and
Committee on Oversight and Government Reform

U.S. House of Representatives

September 16, 2026

EXECUTIVE SUMMARY

The Committee on House Administration, the Committee on the Judiciary, and the Committee on Oversight and Government Reform are charged with ensuring the integrity of American elections.[1] To that end, the Committees have been examining allegations that ActBlue, a leading political fundraising organization, allowed bad actors, including foreign actors, to exploit its online platform to make fraudulent political donations.[2]

In late 2024, the Committees began investigating ActBlue's fraud-prevention practices. The Committees have since released two interim staff reports detailing ActBlue's "lenient approach" to fraud prevention in 2024 and the resulting collapse of the platform's legal and compliance team in the months after the 2024 election.[3] During the investigation, ActBlue assured the Committees that it had produced all information relevant to the Committees' inquiry.[4] However, on April 2, 2026, the *New York Times* published an article about ActBlue's fraud-prevention practices, which contained facts and cited documents that ActBlue had not produced to the Committees.[5] Among other details, the *Times* quoted from two documents—an employee resignation letter and internal company messages—revealing fraud and whistleblower retaliation at ActBlue.[6] The *Times* also reported that ActBlue's outside counsel and former Biden White House Counsel, Dana Remus, drafted memoranda for ActBlue concluding that CEO Regina Wallace-Jones may have misled Congress about ActBlue's review processes for foreign contributions, and that ActBlue's acceptance of illegal foreign contributions appeared to be "knowing and willful."[7]

Following these reports, the Committees requested additional documents related to ActBlue's processes for reviewing foreign contributions. New information obtained by the Committees reveals new details about ActBlue's unserious approach to fraud prevention on its platform. For example:

---

[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] *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").
[3] *Id*.
[4] *See, e.g*., Letter from Mr. Vincent Cohen, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Sep. 19, 2025) (on file with Comms.).
[5] Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned,* N.Y. TIMES (Apr. 2, 2026).
[6] *Id.*
[7] *Id.*

- ActBlue's policies that allegedly "prevent" illegal, fraudulent political contributions could be bypassed easily by foreign actors.[8]

- ActBlue's "passport verification process," which allegedly prevents illegal foreign donations, is an ineffective security method that does not actually require a valid U.S. passport number.[9]

- ActBlue repeatedly instructed its fraud prevention analysts to "give the donor the benefit of the doubt" and to ignore red flags about contributions with foreign indicators.[10]

In 2023, Wallace-Jones wrote to the Committee on House Administration to describe ActBlue's multilayered approach to "root out potential foreign contributions."[11] The letter claimed that ActBlue required passport information from donors providing an address outside of the United States, and that "[o]nly donations with passport information are processed."[12] In its subsequent document production, ActBlue claimed that the platform "validates" passport numbers to ensure that non-U.S. citizens or foreign donors cannot provide political contributions through the platform.[13] However, internal documents reveal that ActBlue's "passport verification" feature is essentially toothless—it only ensures that the entered passport number contains a certain number of characters, not that it is a valid U.S. passport number. The provided documents expose that ActBlue does "not verify the [passport number] information in any other way . . . [or] check the information provided against a government database."[14]

The documents produced to the Committees also detail several scenarios in which ActBlue supervisors instruct fraud prevention analysts to "give the donor the benefit of the doubt" in making a contribution, despite multiple red flags.[15] Oftentimes, ActBlue employees were instructed to accept a donation that they had previously rejected for signs of an illegal foreign contribution. One ActBlue employee noted that a donor who "has a few red flags, such as IP/billing mismatch and a concerning IP provider name, a foreign credit card, an odd email domain, and [is] connected to other rejected users via browser fingerprint," should be accepted because ActBlue "can't say for sure that this is fraud."[16] In another case, an analyst reported "an odd pattern of small donations to the [Kamala] Harris campaign using prepaid cards," which another ActBlue employee affirmed were "good to accept."[17] ActBlue reportedly banned contributions from foreign prepaid cards and gift cards just before the 2024 election to prevent fraudulent donations via these methods.[18]

---

[8] Doc. Production 5 from ActBlue to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 25, 2026), (hereinafter "June 25 document production").
[9] *Id*.
[10] *Id*.
[11] Letter from Ms. Regina Wallace-Jones, Chief Executive Officer, ActBlue, to Rep. Bryan Steil, Chairman, Comm. on House Administration (Nov. 27, 2023).
[12] *Id*.
[13] June 25 document production, *supra* note 8.
[14] *Id*.
[15] *Id*.
[16] *Id*.
[17] *Id*.
[18] *Id*.

ActBlue previously insisted that requiring a card verification value (CVV) for recurring online political donations is unnecessary to prevent fraudulent donations and hinders the platform's contribution rate. According to a letter from Wallace-Jones to Chairman Steil in November 2023, as of that time, ActBlue "currently require[s] and use[s] CVV on many transactions across the site, and ha[s] been in the process of increasing coverage of CVV to improve the donor experience."[19] In a subsequent letter to then-Virginia Attorney General Jason Miyares on August 12, 2024, ActBlue stated that CVVs are required for "all donors entering a new credit card number" and "are an additional measure used to verify that a person making a transaction is in physical possession of the card being used."[20] In January 2024, ActBlue began requiring a CVV for most transactions, although this rule change was carefully calibrated to minimize the effects on ActBlue's donation volume and reputation.[21]

The findings in this report expand upon the Committees' earlier revelations about ActBlue's flawed and inadequate fraud-prevention practices. As explained in the Committees' initial report from April 2025, ActBlue weakened its fraud-prevention standards twice in 2024 to take "a more lenient approach" to fraud prevention by triggering fewer manual reviews.[22] In July 2024, ActBlue confirmed that its recent policy changes allowed more fraud than the January 2024 CVV requirement prevented.[23] According to documents produced to the Committees, ActBlue stated that "there is no evidence that foreign donations through online or small-dollar contributions are a problem in U.S. elections,"[24] and alleged that requiring a CVV for online contributions was a political scheme for "suppressing political participation."[25] ActBlue explained that "adding additional fields to a contribution form decreases conversion rates, and suppresses contributions, while not adding any security."[26] ActBlue's approach to implementing fraud prevention polices is reflected in internally-circulated documents stating that the CVV requirement is a result of Republicans' supposed "fear" of ActBlue and the alleged "power of Democratic small-dollar donors."[27]

These new revelations build on the Committees' previous findings regarding ActBlue's lenient fraud-prevention policies. The Committees' April 2025 report detailed how internal documents produced to the Committees by ActBlue and its fraud-prevention contractor, Sift, "reflect a fundamentally unserious approach to fraud prevention at ActBlue—one that has left the door open for largescale fraud campaigns on Democrats' top fundraising platform."[28] The

---

[19] Letter from Ms. Regina Wallace-Jones, CEO, ActBlue, to Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Nov. 27, 2023).
[20] Letter from ActBlue to Jason S. Miyares, Att'y Gen. of Virginia (Aug. 12, 2024).
[21] Email from ActBlue Product Manager to ActBlue Staff (Jan. 2, 2024), *see* Ex. 1; ActBlue Meeting Agenda & Notes re: Sift percentile change, ActBlue (July 8, 2024); *see* Ex. 2.
[22] ActBlue Staff Report I, *supra* note 2, at 6.
[23] *Id*.
[24] June 25 document production, *supra* note 8.
[25] Memorandum from ActBlue, Requiring a CVV for online contributions suppresses small-dollar donations and doesn't prevent foreign transactions, AB-House-000415 (on file with Comms.).
[26] Memorandum from ActBlue, Requiring a CVV for online contributions suppresses small-dollar donations and doesn't prevent foreign transactions, AB-House-000501 (on file with Comms.).
[27] Memorandum from ActBlue, Historic Dem Fundraising through ActBlue Leads to Right-Wing Attacks, AB-House-000422, (on file with Comms.).
[28] ActBlue Staff Report I, *supra* note 2, at 1.

Committees' oversight has found that ActBlue, in its own words, decided to take "a more lenient approach" to fraud prevention in 2024, weakening its fraud-prevention policies at least twice even though internal assessments showed that these changes would result in a measurable increase in fraudulent contributions.[29] Similarly, internal trainings directed ActBlue's fraud-prevention team to "look for reasons to accept contributions" rather than to examine them closely for indicators of fraud—as required by federal regulation.[30] ActBlue took this lax approach to fraud prevention even though it had detected at least 22 significant fraud campaigns on the platform in recent years, including several from foreign sources.[31]

In April 2026, the Committees published a second interim report, following reports that at least seven senior staff members, including ActBlue's "highest-ranking legal officer," resigned from or were fired by the platform in the months following the 2024 election.[32] According to reporting by the *New York Times*, the last remaining lawyer on ActBlue's legal team, Zain Ahmad, went "on leave" and had his access to internal systems revoked in late February 2025.[33] Ahmad reportedly claimed that he had been retaliated against by ActBlue staff for blowing the whistle on internal misconduct.[34] After ActBlue suspended its voluntary cooperation with the Committees' oversight in June 2025,[35] the Committees issued subpoenas for documents and communications related to staff turmoil and alleged retaliation on July 22, 2025.[36]

Documents produced pursuant to the Committees' subpoenas show the collapse of ActBlue's legal and compliance team. By March 2025, every member of ActBlue's legal and compliance team resigned, was fired, or went on extended leave from the platform.[37] According to subsequent media reports, this mass exodus was a direct consequence of ActBlue's failure to deter illegal foreign political donations—which the Committees first uncovered in April 2025[38]—and Wallace-Jones's previous misstatements to Congress.[39] Put simply: every member of ActBlue's legal and compliance team appears to have left the platform after the 2024 election because of its "knowing and willful" acceptance of illegal foreign contributions, and the subsequent cover-up.[40]

---

[29] *Id*. at 6-9.
[30] *Id*. at 10-14; *see* Deposit of receipts and disbursements, 11 C.F.R. § 103.3(b) (2024).
[31] ActBlue Staff Report I, *supra* note 2, at 14-17.
[32] Reid J. Epstein & Shane Goldmacher, *ActBlue, the Democratic Fund-Raising Powerhouse, Faces Internal Chaos*, N.Y. TIMES (Mar. 5, 2025).
[33] *Id*.
[34] *Id*.
[35] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025) (on file with Comms.).
[36] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Ms. Regina Wallace-Jones, CEO, ActBlue (July 22, 2025) (attaching subpoena).
[37] Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex. 3; ActBlue Legal & Compliance Operations Specialist Resignation Letter (Mar. 4, 2025), *see* Ex. 4; Email from ActBlue HR Employee to Regina Wallace-Jones (Feb. 26, 2025, 5:01 PM), *see* Ex. 5.
[38] ActBlue Staff Report I, *supra* note 2.
[39] Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned,* N.Y. TIMES (Apr. 2, 2026).
[40] *Id*. (quoting memoranda prepared by ActBlue's outside counsel).

One of these abrupt departures was ActBlue's Interim General Counsel Aaron Ting.[41] Internal messages among ActBlue staff stated that Ting was "really unhappy with what he[] [had] seen while being in the interim role" and staff claimed that Ting may have been "more fed up tha[n] we realized."[42] However, Ting's concerns were much more serious. According to the *New York Times,* which reviewed Ting's resignation letter, Ting wrote that he was "concerned that leadership is not fully committed to transparently addressing with the Board the seriousness of our most pressing concerns: the legal compliance of ActBlue's past practices for screening political donations from abroad and its past representations to Congress regarding foreign donations and related matters[.]"[43] The Committees pressed ActBlue to produce Ting's resignation letter, which falls under the scope of the Committees' subpoenas. To date, ActBlue continues to withhold large portions of Ting's resignation letter on the basis of attorney-client privilege.[44] Notably, when ActBlue finally produced a heavily redacted version of the resignation letter to the Committees, all information regarding misconduct at ActBlue—including the words quoted by the *New York Times*—was redacted and shielded as supposed "legal advice."[45]

After Ting's resignation, Legal Counsel Zain Ahmad became the new interim head of ActBlue's legal team, reporting directly to CEO Wallace-Jones.[46] On his first full day, February 25, 2025, Ahmad sent the memoranda from ActBlue's outside counsel detailing the platform's misconduct "to the ActBlue board of directors [and] ActBlue's executive leadership team[.]"[47] Later that day, Ahmad suspiciously requested a "leave of absence."[48] The following day, ActBlue Chief People & Culture Officer Candace King violated internal policy and locked Ahmad out of his email and other internal systems.[49] However, Ahmad retained access to Slack, ActBlue's internal messaging platform.[50] On February 26, 2025, Ahmad sent a Slack message to ActBlue's IT Support group requesting that they restore access to his essential accounts.[51] However, Hanna Bonin, ActBlue's director of IT, deleted Ahmad's message minutes after it was sent.[52] Ahmad

---

[41] Internal ActBlue Employee Message (Feb. 21, 2025), *see* Ex. 6; Internal Message from Aaron Ting to Candace King (Feb. 14, 2025, 10:14 PM), *see* Ex. 7; *see also* Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned*, N.Y. TIMES (Apr. 2, 2026).
[42] Internal ActBlue Employee Message (Feb. 21, 2025), *see* Ex. 6; Internal ActBlue Employee Message (Feb. 18, 2025), *see* Ex. 8.
[43] 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).
[44] Email from Vincent Cohen, Counsel to ActBlue, to Comm. Staff, H. Comm. on the Judiciary (July 2, 2026) (on file with Comms.).
[45] Letter from Mr. Vincent Cohen, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 26, 2026).
[46] ActBlue Staff Report I, *supra* note 2.
[47] Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned,* N.Y. TIMES (Apr. 2, 2026).
[48] *Id.*; Email from ActBlue HR Employee to Zain Ahmad (Feb. 25, 2025), *see* Ex. 9; Email from ActBlue Union to ActBlue Board (Feb. 27, 2025), *see* Ex 3.; *see also* Reid J. Epstein & Shane Goldmacher, *ActBlue, the Democratic Fund-Raising Powerhouse, Faces Internal Chaos,* N.Y. TIMES (Mar. 5, 2025).
[49] Internal Message from Candace King to ActBlue Employee (Feb. 26, 2025), *see* Ex. 10.
[50] Email from ActBlue HR Employee to Regina Wallace-Jones (Feb. 26, 2025, 5:01 PM), *see* Ex. 5.
[51] Internal Message from Zain Ahmad to 277 ActBlue Employees (Feb. 26, 2025), *see* Ex. 11.
[52] *Id*.

sent several additional messages, alluding to retaliation for blowing the whistle on ActBlue's misconduct.[53] Bonin deleted each message after they were sent—a total of six times.[54]

ActBlue's "knowing and willful" acceptance of illegal foreign political donations and subsequent cover-up, as well as its lenient approach to preventing fraudulent donations, are of great concern to the Committees.[55] It is unlawful "to solicit, accept, or receive a [political] contribution or donation" from "a foreign national."[56] Federal law also prohibits making "any materially false, fictitious, or fraudulent statement or representation" to Congress.[57] ActBlue and Wallace-Jones appear to have done both.

The Committees are charged by the House of Representatives with protecting the integrity of American elections and will continue investigating to inform potential legislative reforms that improve and strengthen America's democracy. In May 2026, the Committee on House Administration passed multiple bills to improve transparency and eliminate foreign donations in American elections.[58] As these bills continue through the legislative process, the Committees' oversight will ensure that American elections are free, fair, and decided by Americans alone.

---

[53] *Id*

[54] *Id*.

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

[56] 52 U.S.C. § 30121; 52 U.S.C. § 30109(d).

[57] 18 U.S.C. § 1001; 2 U.S.C. § 192.

[58] H.R. 3535, the Stop Foreign Funds in Elections Act, 119th Cong. (2026); H.R. 8720, the Campaign Finance Transparency Act, 119th Cong. (2026); H.R. 8721, the Preventing Foreign Interference in American Elections Act, 119th Cong. (2026).

TABLE OF CONTENTS

In March 2024, ActBlue released a new "passport verification" feature to prevent fraudulent political donations from foreign actors.[59] ActBlue claimed that the feature "validates" the passport number of U.S. citizens traveling or living abroad during the time of their contribution to ensure that non-U.S. citizens or foreign donors cannot provide political contributions through the platform.[60] However, documents produced to the Committees undermine ActBlue's assertion. The documents describe how ActBlue's passport verification process only requires that the entered passport number contain a certain number of characters; the process does not involve authenticating the U.S. passport number.[61] This "verification" process could allow foreign actors to enter any random combination of numbers and donate to political campaigns in the United States, in violation of federal law. In addition to the platform's weak fraud-prevention policies and verification procedures, ActBlue has regularly instructed its employees to "give the donor the benefit of the doubt," even when there are significant concerns that a contribution may be from a fraudulent, foreign donor.[62]

I. ActBlue's "passport verification process" is an ineffective security method that does not actually require a valid U.S. passport to donate.

Internal documents describe how ActBlue's "passport verification" feature would potentially allow fraudulent political donations from foreign actors. [63] ActBlue reportedly designed the process so that donors living or traveling abroad must enter their U.S. passport number, or they "cannot complete their contribution."[64] According to ActBlue, "[i]f someone enters an address when making a contribution that includes a country other than the United States, they see a popup in the contribution flow requesting their passport number."[65] ActBlue's own policy states, however, that the "verification" process requires only that a donor enter the correct amount of characters to complete the prompt; it does not actually require that the donor provide a legitimate U.S. passport number.[66] Under ActBlue's procedures, the passport verification feature "uses very basic validation—number of characters—to ensure that the number entered is a valid passport number, but [it does] not verify the information in any other way. . . . [It does] not, for instance, check the information provided against a government database. . . . [It] merely store[s] the information and continue[s] the contribution flow."[67]

---

59 Memorandum from ActBlue, Slack Announcement for New Passport Verification Feature, *see* Ex. 12.
60 Memorandum from ActBlue, Procedure for Contributions Made Without a Passport Number, *see* Ex. 13.
61 *Id*.
62 *See, e.g.*, ActBlue Employee Contribution Review, *see* Ex. 14.
63 Memorandum from ActBlue, Procedure for Contributions Made Without a Passport Number, *see* Ex. 13.
64 *Id*.
65 *Id.*
66 *Id*.
67 *Id*.

> Recently, we built a tool to assist campaigns and committees using our site to verify that contributors are U.S. citizens or permanent residents. If someone enters an address when making a contribution that includes a country other than the United States, they see a popup in the contribution flow requesting their passport number. This is a method approved by the FEC for confirming citizenship or permanent residency. If the contributor does not enter a passport number, they cannot complete their contribution. We use some very basic validation -- number of characters -- to ensure that the number entered is a valid passport number, but we do not verify the information in any other way. We do not, for instance, check the information provided against a government database. We merely store the information and continue with the contribution flow.

An ActBlue customer service page details the "Procedure for Contributions Made Without a Passport Number."

Even more concerning, ActBlue's internal documents describe that if a donor does not have a U.S. passport or address in the United States, an ActBlue employee has the ability to determine an "alternative method of verifying the [donor's] citizenship."[68] The employee's decision allegedly requires an explanation of the law and review from ActBlue's legal department, but the procedure ultimately allows, and in fact encourages, ActBlue employees to put "a placeholder in the passport number field of [the donor's] ActBlue account."[69] The placeholder allows ActBlue to accept all subsequent contributions from the donor without requiring a U.S. passport number.[70] If an ActBlue employee determines a donor without a U.S. passport or address in the United States is a U.S. citizen, ActBlue's ostensibly secure passport number placeholder is "ACTBLUEXX."[71] In one example, ActBlue accepted a contribution from a foreign donor who provided copies of a Form 225-A ("Card of Identity and Registration), which expired on August 27, 1974, and a birth certificate from the Detroit Health Department, but no U.S. passport.[72] A member of ActBlue's Legal and Compliance team stated that "[t]his seems like sufficient evidence to me!"[73]

Despite ActBlue's ineffective passport verification process, ActBlue employees regularly relied on the feature to determine that donors were not foreign actors. ActBlue's policy for passport verification from foreign donations was woefully inadequate for meaningfully identifying and flagging foreign donations. ActBlue supervisors directed their teams to accept donations even when there were red flags for potential foreign donations, relying instead on the

---

[68] *Id*.
[69] *Id*.
[70] *Id*.
[71] *Id*.
[72] Doc. Production 9 from ActBlue to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Sep. 4, 2026).
[73] *Id*.

incomplete passport verification process.[74] For example, one ActBlue supervisor corrected a fraud-prevention staffer's review of a contribution, noting that a donation should be accepted even though "[t]he donor is foreign, [because they] correctly entered their billing address, so they would be prompted for a passport number."[75]

> 3. AB[redacted] - I disagree with rejecting this donation. The donor is foreign, but correctly entered their billing address, so they would be prompted for their passport number. Their IP/billing are also tightly clustered together. We can accept this type of donation and the campaign will verify their passport number. Also, please remember to add a case comment if

An ActBlue supervisor recorded their notes while auditing a fraud-prevention staffer's manual reviews of contributions.

Another supervisor wrote that the employee should accept a foreign donation to a political organization because "the donor used the correct country code . . . so they would need to enter a passport number."[76] Here, the supervisor acknowledged that even though the donation was foreign, the donor would need to enter a passport number and so long as the passport number was the correct number of digits, that was sufficient for ActBlue's verification process. In both cases, the ActBlue supervisors relied on an inadequate passport verification process to verify a donor's identity — a process that apparently is incapable of determining whether an entered number is a legitimate U.S. passport number.

> I am actually okay with accepting AB[redacted] rather than rejecting. It is a foreign contribution to a political organization, but the donor used the correct country code (they have a billing/IP/CC country match), so they would need to enter a passport number.

An ActBlue supervisor recommended accepting a foreign contribution to a political organization, relying on the passport verification process to prevent fraud.

II. ActBlue has repeatedly instructed its fraud-prevention analysts to "give the donor the benefit of the doubt" and ignore red flags about contributions.[77]

As detailed in the Committees' initial April 2025 report, ActBlue employs Sift, an "AI-powered fraud decisioning" platform, as the key cog in its fraud-prevention operations.[78] Most ActBlue transactions are processed through Sift, which assigns each transaction a 0 to 100 fraud likelihood score based on various indicators of fraud.[79] ActBlue sets and periodically tweaks guidelines dictating the transactions that Sift flags for ActBlue staff to review.[80] Transactions with high Sift scores (indicating a high likelihood of fraud) from high-risk countries, or bearing other indicators of fraud, may be flagged for automatic rejection or manual review.[81]

---

[74] *See e.g.,* Internal Messages between ActBlue Employees, ActBlue Employee Contribution Review, *see* Ex. 14.
[75] *Id*.
[76] Internal Messages between ActBlue Employees, ActBlue Employee Contribution Review, *see* Ex. 15.
[77] *See, e.g.*, ActBlue Employee Contribution Review, *see* Ex. 16.
[78] ActBlue Staff Report I, *supra* note 2.
[79] Memorandum from ActBlue, Fraud Prevention FAQ (on file with the Comms.).
[80] Memorandum from ActBlue, Summary of changes to Sift rules since 2023 (on file with the Comms.).
[81] *Id*.

Following Sift's review, ActBlue automatically accepts 99.8 percent of donations.[82] According to ActBlue, the remaining 0.2 percent are manually reviewed by ActBlue staff, or automatically rejected if they "use foreign prepaid/gift cards, domestic gift cards, are from high-risk/sanctioned countries, [or] have the highest level of risk as determined by Sift."[83] Only five percent of contributions that are manually reviewed are rejected, meaning that ActBlue rejects significantly "less than 0.1 [percent] of all contributions" for suspected fraud.[84]

In its June 25, 2026, production to the Committees, ActBlue provided logs of staffers' manual reviews of contributions that were flagged for potential fraud between October 9, 2022, and October 31, 2024.[85] ActBlue supervisors recorded notes regarding the performance of each fraud prevention analyst during their shift, including recommending that certain contributions be either accepted or rejected. These entries reveal the frequency with which supervisors reinforced the ActBlue policy: "we give the benefit of the doubt to the donor."[86] On one occasion, shown below, a supervisor listed the various red flags associated with a particular foreign donor, including "IP/billing mismatch and a concerning IP provider name, a foreign credit card, an odd email domain, and being connected to other rejected users" but instead of commending his or her subordinate for blocking the donation, the supervisor instructed the subordinate to accept the donation because they could not "say for sure that this is fraud."[87] While this process gives the appearance that ActBlue supervisors meaningfully review potentially fraudulent donations, the logs are clear that the consistent instruction to ActBlue staff was to accept donations that appear fraudulent based on "the benefit of the doubt."

> I could go either way on AB[redacted]. I don't necessarily disagree with [redacted]'s decision, and as we have said, we give the benefit of the doubt to the donor. However, this donor has a few red flags, such as IP/billing mismatch and a concerning IP provider name, a foreign credit card, an odd email domain, and being connected to other rejected users via browser fingerprint. I can't say for sure that this is fraud, so I am good with the accept, but one worth discussing!

An ActBlue supervisor reiterated that a fraud-prevention staffer should "give the benefit of the doubt to the donor," despite multiple red flags about the contribution.

One ActBlue supervisor explained that a contribution "set off a lot of Sift's alarms but [they] agree with [the employee] in giving them the benefit of the doubt and accepting this."[88]

> Contribution AB[redacted] set off a lot of Sift's alarms but I agree with [redacted] in giving them the benefit of the doubt and accepting this.

[82] *Id*.
[83] *Id*.
[84] Memorandum from ActBlue, How Sift is Impacting Our Work at ActBlue (on file with the Comms.); Memorandum from ActBlue, Fraud Prevention 101 for New Associates in the Workflow (on file with the Comms.).
[85] *See* June 25 document production, *supra* note 8.
[86] Internal Messages between ActBlue Employees, ActBlue Employee Contribution Review, *see* Ex. 16.
[87] *Id.*
[88] Internal Messages between ActBlue Employees, ActBlue Employee Contribution Review, *see* Ex. 17.

An ActBlue supervisor agreed that fraud-prevention staffers should "give the donor the benefit of the doubt," despite multiple fraud indicators.

Another supervisor commended a "great accept," because a "donor has a few foreign IPs, but they are all consistently in the same place."[89]

> 2. AB[redacted] - Great accept. Donor has a few foreign IPs but they are all consistently in the same place.

An ActBlue supervisor approved accepting a contribution from a donor with several foreign IP addresses.

One supervisor noted that a denied foreign contribution "should have [been] accepted," even though "[t]he donor uses an Arkansas state code which isn't great, but [the] system can be wonky with requiring state codes for foreign donors."[90]

> [redacted] should have accepted AB[redacted] It is a foreign contribution, but the name/email match, the IP/billing match, a full address with the correct country code, and there were previously accepted and successful contributions. The donor uses an Arkansas state code which isn't great, but our system can be wonky with requiring state codes for foreign donors.

An ActBlue supervisor recommended that a foreign contribution from a previous donor be accepted.

Another employee suggested that a donor who "sometimes has an IP in Hong Kong" be accepted because "none of their signals [potential fraud-indicators] raise any eyebrows."[91]

> 2. AB[redacted] - Great accept. Donor sometimes has an IP in Hong Kong but none of their other signals raise any eyebrows.

An ActBlue supervisor approved of accepting a potentially foreign contribution.

Further, instead of verifying a donors' identity using a reliable source, ActBlue employees referred to donors' social media accounts to confirm their identity. In one case, according to review logs, an ActBlue supervisor noted that "all signs point to [a donor] being from Canada, but they used a Missouri billing address."[92] Nonetheless, the supervisor recommended that ActBlue accept the donation because the donor appeared to have an active Twitter account.[93]

---

[89] Internal Messages between ActBlue Employees, ActBlue Employee Contribution Review, *see* Ex. 18.
[90] Internal Messages between ActBlue Employees, ActBlue Employee Contribution Review, *see* Ex. 19.
[91] Internal Messages between ActBlue Employees, ActBlue Employee Contribution Review, *see* Ex. 20.
[92] Internal Messages between ActBlue Employees, ActBlue Employee Contribution Review, *see* Ex. 21.
[93] *Id*.

Accept of donation AB[redacted] is good! Its odd that all signs point to this person being from Canada but they used a Missouri billing address, but Twitter seems to confirm that they are a real person!

An ActBlue supervisor approves of accepting a contribution from a potentially foreign donor because they have a Twitter account.

One ActBlue employee noted that a foreign donation should be accepted, "[e]ven though they have some IP/Billing mismatches, [because] it seems like this is a real donor, reinforced by them having a LinkedIn."[94]

No overturned decisions. I like that you accepted AB[redacted] Even though they have some IP/Billing mismatches, it seems like this is a real donor, reinforced by them having a LinkedIn.

An ActBlue supervisor approved of accepting a contribution from a potentially foreign donor because they had a LinkedIn account.

Another ActBlue supervisor wrote that there is "nothing suspicious" about a donor who used a prepaid card and that it was not enough reason to reject the contribution.[95] ActBlue reportedly banned contributions from foreign prepaid cards and gift cards just before the 2024 election to prevent fraudulent donations using these methods.[96]

2. AB[redacted] - Great accept. Nothing suspicious about the donor. They use a prepaid card but that alone isn't reason for us to reject.

An ActBlue supervisor approved of accepting a donation from a prepaid card.

Documents provided to the Committees demonstrate additional examples in which ActBlue supervisors instructed fraud-prevention staffers to accept potentially fraudulent donations, often deferring to ActBlue's ineffective "passport verification process" to "prevent" illegal foreign political contributions. These documents make it clear that ActBlue maintained a culture within its fraud-prevention team that instructed analysts to accept potentially fraudulent or illegal foreign donations, even in the face of significant red flags.

III. According to reporting by the *New York Times,* ActBlue's legal team voiced significant concerns about ActBlue's past practices for screening foreign donations.

In October 2023, the Committee on House Administration requested information about ActBlue's failure to require CVVs and deter fraud on the platform.[97] According to the *New York Times*, ActBlue's November 2023 response, signed by CEO Wallace-Jones, made material

[94] Internal Messages between ActBlue Employees, ActBlue Employee Contribution Review, *see* Ex. 22.
[95] Internal Messages between ActBlue Employees, ActBlue Employee Contribution Review, *see* Ex. 23.
[96] Memorandum from ActBlue, Sift Rule Changes – Adjustments to Prepaid Cards (on file with the Comms.).
[97] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., to Ms. Regina Wallace-Jones, CEO, ActBlue (Oct. 31, 2023).

misrepresentations about ActBlue's processes for deterring illegal foreign donations.[98] In fact, the fraud-prevention processes were alarmingly weak.[99] In late 2024, as ActBlue faced renewed scrutiny from the Committees for its suspect fraud-prevention practices,[100] ActBlue's outside counsel prepared two memoranda detailing ActBlue's apparently "knowing and willful" acceptance of illegal foreign donations and Wallace-Jones's subsequent misstatements to Congress.[101] The outside counsel's review, as quoted by the *Times*, concluded that "ActBlue did not have the rigor in its review of overseas donations that was required or that it had described to congressional investigators."[102] ActBlue's outside lawyers proposed that Wallace-Jones "correct the record," noting "risks" associated with failing to do so.[103] Former Biden White House Counsel Dana Remus, who led the legal review, even recommended that Wallace-Jones hire a personal lawyer to navigate her own criminal exposure.[104] Instead of heeding Remus's advice, Wallace-Jones "terminated" the law firm and disparaged their review.[105] Wallace-Jones's refusal to address the apparent illegal contributions or her misstatements to Congress appears to have led every remaining member of ActBlue's internal legal and compliance team to leave the company, including former Interim General Counsel Aaron Ting.

Ting's resignation letter reportedly stated that he was resigning because of his concerns about "ActBlue's past practices for screening political donations from abroad and its past representations to Congress regarding foreign donations and related matters."[106] As reported by the *Times*, Ting also wrote that he was "concerned that leadership [was] not fully committed to transparently addressing with the Board the seriousness of" ActBlue's misconduct.[107] Ting's letter also reportedly raised concerns about ActBlue's misleading statements to Congress.[108]

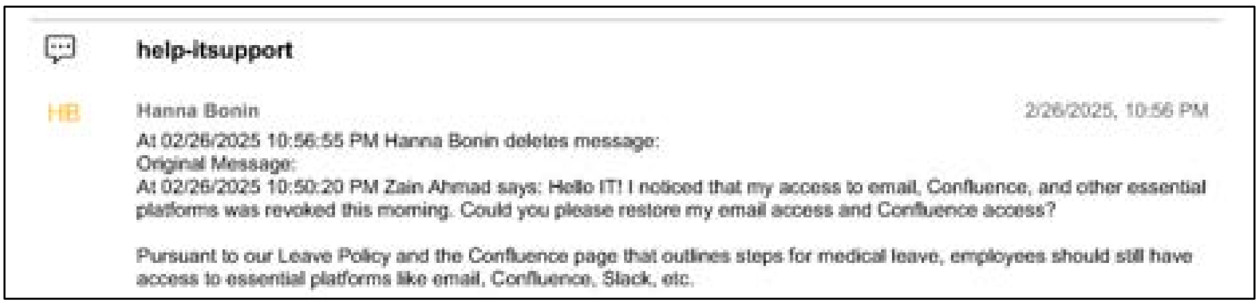
Following Ting's resignation, Zain Ahmad, the last remaining lawyer on ActBlue's legal team, went "on leave" and against company policy, had his access to internal systems revoked in late February 2025.[109] Before his departure, Ahmad, consistent with his legal and ethical responsibilities, reportedly notified ActBlue leadership, including ActBlue's Board of Directors,

---

[98] Letter from Ms. Regina Wallace-Jones, CEO, ActBlue, to Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Nov. 27, 2023).
[99] ActBlue Staff Report I, *supra* note 2.
[100] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., to Ms. Regina Wallace-Jones, CEO, ActBlue (Oct. 28, 2024); Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., to Ms. Regina Wallace-Jones, CEO, ActBlue (Oct. 30, 2024) (attaching subpoena); Letter from Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Ms. Regina Wallace-Jones, CEO, ActBlue (Dec. 9, 2024).
[101] Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned,* N.Y. TIMES (Apr. 2, 2026) (quoting memoranda).
[102] *Id.*
[103] *Id.* (quoting memoranda).
[104] *Id.*
[105] *Id.*
[106] *Id.* (quoting letter).
[107] *Id.* (quoting letter).
[108] *Id.*
[109] Internal Message from Candace King to ActBlue Employee (Feb. 26, 2025), *see* Ex. 10; ActBlue Leave of Absence & FMLA Guidance ("While access to most systems will be paused" during an extended leave, "essential tools such as email . . . will remain available to ensure continuity if necessary."), *see* Ex. 24.

of credible allegations of misconduct at the company, including significant alleged violations of federal campaign finance law and false statements to Congress.[110]

Ahmad then went on a suspicious medical leave of absence while ActBlue's top HR official locked him out of his "essential" accounts.[111] Despite HR staff's assertion that Ahmad would retain access to his ActBlue accounts, ActBlue Chief People & Culture Officer Candace King violated internal policy and locked Ahmad out of his email and other internal systems.[112] In response, Ahmad sent an internal Slack message to ActBlue's IT Support group, a group that contains 277 people, stating that his "access to email, Confluence, and other essential platforms was revoked this morning" and requested IT restore his access.[113] Ahmad explained that employees on medical leave "should still have access to essential platforms like email, Confluence, Slack, etc."[114] Hanna Bonin, ActBlue's director of IT, deleted Ahmad's request five minutes later.[115]


help-itsupport

HB Hanna Bonin 2/26/2025, 10:56 PM

At 02/26/2025 10:56:55 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 10:50:20 PM Zain Ahmad says: Hello IT! I noticed that my access to email, Confluence, and other essential platforms was revoked this morning. Could you please restore my email access and Confluence access?

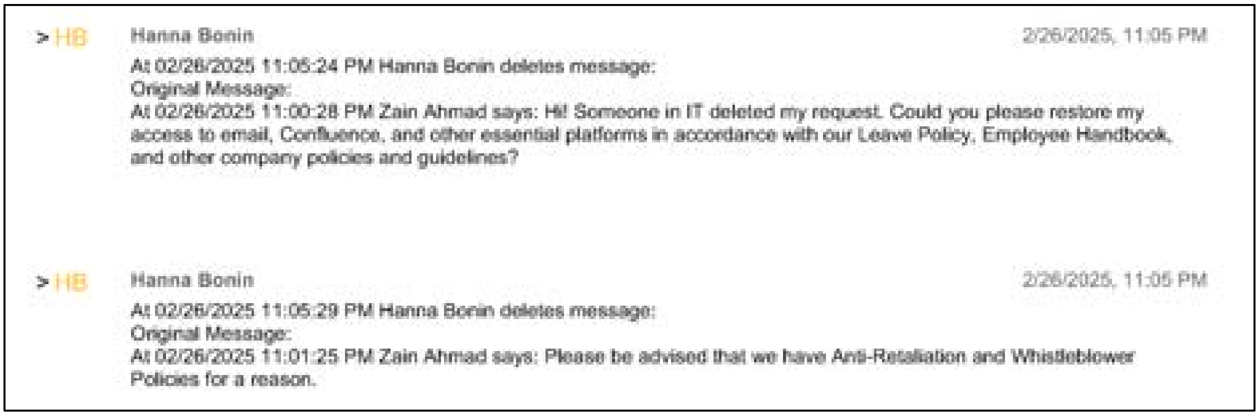
Pursuant to our Leave Policy and the Confluence page that outlines steps for medical leave, employees should still have access to essential platforms like email, Confluence, Slack, etc.

10:50 PM Slack Message from Zain Ahmad requesting his access be restored. Hanna Bonin deleted the message five minutes later.

After Bonin deleted Ahmad's second request, Ahmad wrote, "Please be advised that we have Anti-Retaliation and Whistleblower Policies for a reason," alleging that King's and Bonin's treatment toward him was retaliation for blowing the whistle on ActBlue's misconduct.[116] Bonin deleted this message too.[117]

---

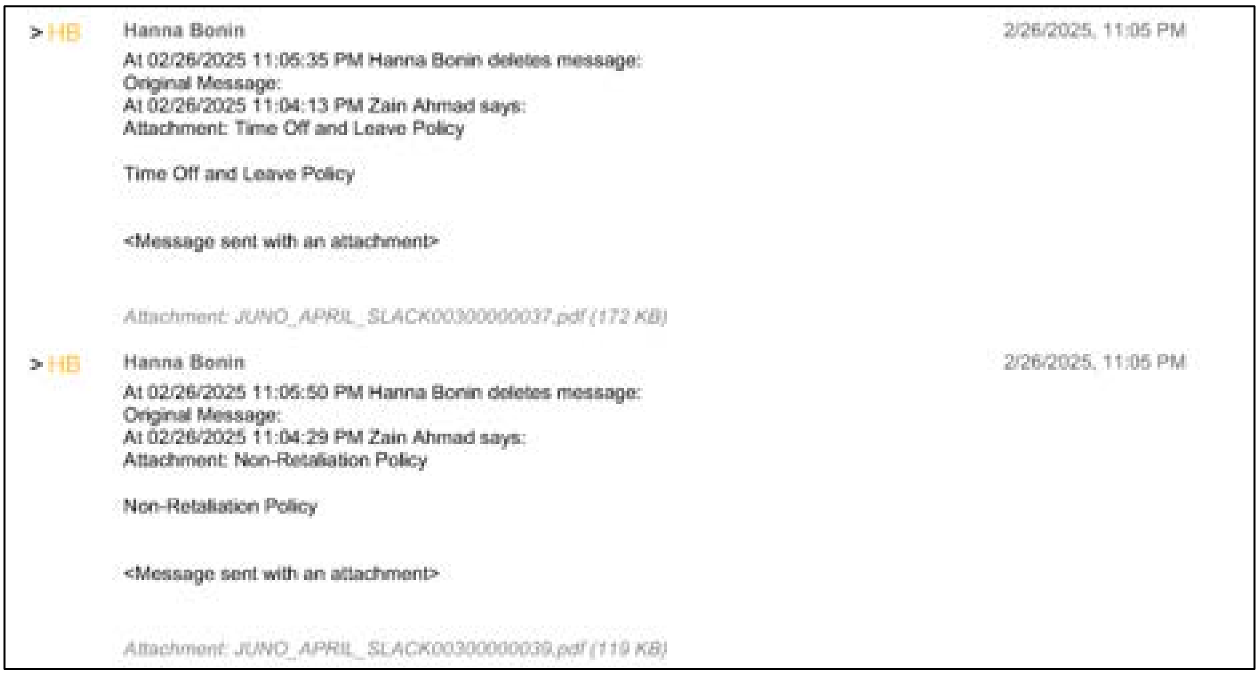
[110] Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned,* N.Y. TIMES (Apr. 2, 2026).
[111] ActBlue Leave of Absence & FMLA Guidance, *see* Ex. 24.
[112] *Id.*; Internal Message from Candace King to ActBlue Employee (Feb. 26, 2025), *see* Ex. 10.
[113] Internal Message from Zain Ahmad to 277 ActBlue Employees (Feb. 26, 2025), *see* Ex. 11.
[114] *Id*.
[115] *Id.*
[116] *Id*.
[117] *Id.*


> HB Hanna Bonin 2/26/2025, 11:05 PM
At 02/26/2025 11:05:24 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:00:28 PM Zain Ahmad says: Hi! Someone in IT deleted my request. Could you please restore my access to email, Confluence, and other essential platforms in accordance with our Leave Policy, Employee Handbook, and other company policies and guidelines?

> HB Hanna Bonin 2/26/2025, 11:05 PM
At 02/26/2025 11:05:29 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:01:25 PM Zain Ahmad says: Please be advised that we have Anti-Retaliation and Whistleblower Policies for a reason.

11:00 PM Slack messages from Ahmad citing the Employee Handbook, Leave Policy, Anti-Retaliation, and Whistleblower Policies. Bonin deleted both messages minutes later.

Ahmed then sent ActBlue's Time Off and Leave Policy, the Non-Retaliation Policy, and the Whistleblower Protection Policy.[118] Bonin deleted these messages just minutes later.[119]


> HB Hanna Bonin 2/26/2025, 11:05 PM
At 02/26/2025 11:06:35 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:04:13 PM Zain Ahmad says:
Attachment: Time Off and Leave Policy

Time Off and Leave Policy

<Message sent with an attachment>

Attachment: JUNO_APRIL_SLACK00300000037.pdf (172 KB)

> HB Hanna Bonin 2/26/2025, 11:05 PM
At 02/26/2025 11:06:50 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:04:29 PM Zain Ahmad says:
Attachment: Non-Retaliation Policy

Non-Retaliation Policy

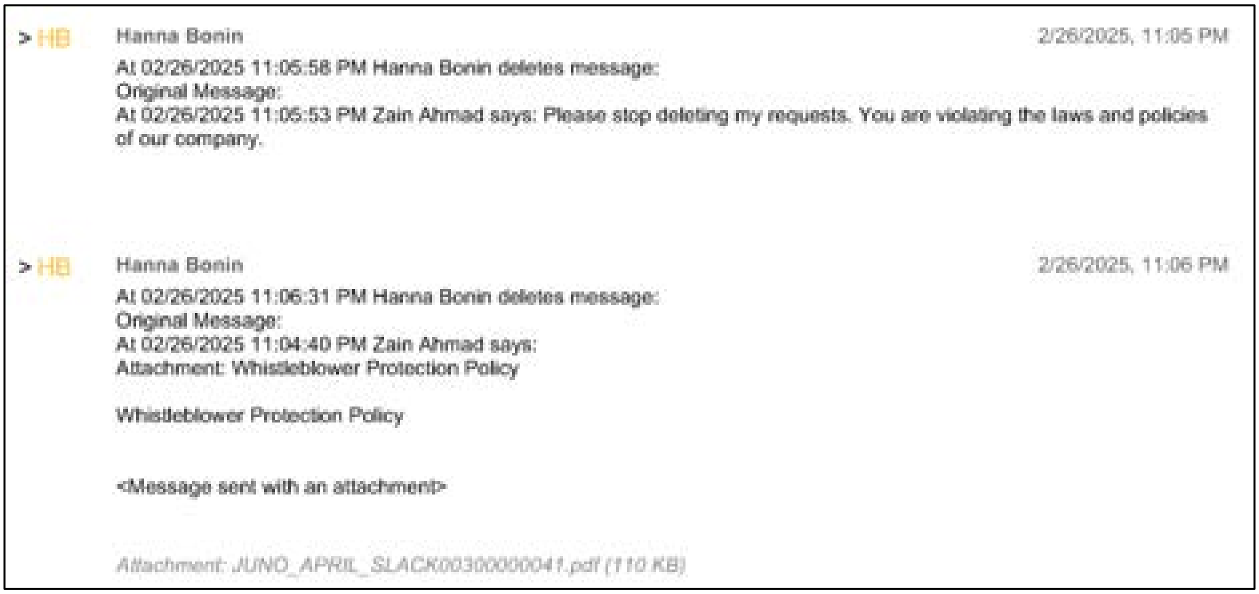
<Message sent with an attachment>

Attachment: JUNO_APRIL_SLACK00300000039.pdf (119 KB)

11:04 PM Slack messages from Ahmad attaching the Leave and Non-Retaliation Policies. Bonin deleted both messages minutes later.

Again, Ahmad messaged Bonin requesting that she "[p]lease stop" deleting his requests because she was "violating the laws and policies of" ActBlue.[120] Here, too, Bonin deleted Ahmad's message—a message declaring that she was violating the laws and ActBlue's policies by retaliating against him.[121]

[118] *Id.*
[119] *Id.*
[120] *Id.*
[121] *Id.*



> HB Hanna Bonin 2/26/2025, 11:05 PM
At 02/26/2025 11:05:58 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:05:53 PM Zain Ahmad says: Please stop deleting my requests. You are violating the laws and policies of our company.

> HB Hanna Bonin 2/26/2025, 11:06 PM
At 02/26/2025 11:06:31 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:04:40 PM Zain Ahmad says:
Attachment: Whistleblower Protection Policy

Whistleblower Protection Policy

<Message sent with an attachment>

Attachment: JUNO_APRIL_SLACK00300000041.pdf (110 KB)

11:05 PM Slack message from Ahmad requesting Bonin stop deleting his messages. Bonin deleted Ahmad's message five seconds later.

This process occurred six times in total, which other ActBlue staff contemporaneously noted "look[ed] like blatant retaliation."[122] Amid this staff outcry, King relented and granted Ahmad access to his email again—on the condition that she could spy on it, using ActBlue's internal security tools to "key in on him" and, presumably, to ensure that he did not jeopardize the cover-up.[123]

After ActBlue's outside counsel noted serious concerns about potentially illegal conduct at the company, the platform's entire legal and compliance team either resigned, was fired, or went on extended leave within just four months after the 2024 election.[124] The Committees sought to question both Ting and Ahmad about these allegations; however, both lawyers asserted their Fifth Amendment right against self-incrimination during depositions.[125] In any event, the documents produced to the Committees further support the Committees' concerns about ActBlue's fundamentally unserious approach to fraud prevention. The company's passport verification process is nothing more than a veneer of protection against illegal foreign contributions.[126] Behind the scenes, ActBlue supervisors urged analysts to accept foreign

---

[122] *Id.*; Internal Message from ActBlue Employee to Candace King (Feb. 26, 2025, 11:46 PM), *see* Ex. 25.
[123] Internal Messages between ActBlue Employee and Candace King (Feb. 27, 2025), *see* Ex. 26.
[124] ActBlue Legal & Compliance Operations Specialist Resignation Letter (Mar. 4, 2025); Email from ActBlue Union to ActBlue Board (Feb. 27, 2025); *see also* Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned,* N.Y. TIMES (Apr. 2, 2026).
[125] Deposition of Aaron Ting, Former Director & Associate General Counsel, Product and Privacy, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform (Nov. 17, 2025); Deposition of Zain Ahmad, Legal Counsel, ActBlue, Comm. on H. Admin., H. Comm. on the Judiciary, & H. Comm. on Oversight and Gov't Reform (Dec. 5, 2025).
[126] Memorandum from ActBlue, Procedure for Contributions Made Without a Passport Number, *see* Ex. 13.

donations—giving donors "the benefit of the doubt" despite real concerns that the contributions were illegal.[127]

[127] *See, e.g.*, Memorandum from ActBlue, ActBlue Employee Contribution Review, *see* Ex. 16.

ACTBLUE PURPOSEFULLY WITHHELD INFORMATION FROM THE COMMITTEES INDICATING IT MISLED CONGRESS

On April 2, 2026, the *New York Times* reported on ActBlue's poor fraud-prevention practices and CEO Wallace-Jones's misstatements to Congress, quoting from ActBlue documents that were not produced to the Committees, despite falling under the scope of the Committees' subpoenas.[128] The documents, which included former Interim General Counsel Aaron Ting's resignation letter and internal messages in which former Legal Counsel Zain Ahmad alleged that he was retaliated against for blowing the whistle on internal misconduct at ActBlue, were clearly responsive to the Committees' subpoenas and unprotected by any reasonable assertion of the attorney-client privilege.[129]

These documents likely contain evidence that ActBlue accepted foreign donations, misled Congress, and then retaliated against an employee who spoke up about it.[130] Nonetheless, ActBlue initially asserted attorney-client privilege or attorney work-product privilege over these and 420 other documents responsive to the Committees' subpoenas.[131]

In a detailed letter to ActBlue dated June 18, 2026, the Committees rejected ActBlue's assertion of privilege over Ting's resignation letter, Ahmad's internal messages, and the category of "documents circulated among non-lawyers containing or reflecting . . . information from an attorney."[132] The Committees explained that because both Ting's resignation letter and Ahmad's internal messages were drafted and sent in the context of an employer-employee relationship—and not an attorney-client relationship "for the purpose of obtaining or providing legal advice"[133]—ActBlue's assertion of privilege over these documents was improper.[134] The Committees also explained that generalized "information from an attorney" is not a sufficient basis on which to assert privilege because attorney-client privilege does not attach if a document is not created "for the purpose of obtaining or providing legal advice,"[135] which ActBlue seems to concede was the case for these documents.[136]

---

[128] Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned,* N.Y. TIMES (Apr. 2, 2026).
[129] *Id*.
[130] *Id*.
[131] Letter from Mr. Vincent Cohen, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 5, 2026) (attaching log of privileged materials).
[132] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Ms. Regina Wallace-Jones, CEO, ActBlue (June 18, 2026).
[133] *In re Kellogg Brown & Root, Inc.*, 756 F.3d 754, 757 (D.C. Cir. 2014); *see also United States v. Mejia*, 655 F.3d 126, 132 (2d Cir. 2011) (explaining that the attorney-client privilege "protects communications (1) between a client and his or her attorney (2) that are intended to be, and in fact were, kept confidential (3) for the purpose of obtaining or providing legal advice.").
[134] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Ms. Regina Wallace-Jones, CEO, ActBlue (June 18, 2026).
[135] *Kellogg Brown & Root*, 756 F.3d at 757.
[136] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Ms. Regina Wallace-Jones, CEO, ActBlue (June 18, 2026); *see* Letter from Mr. Vincent Cohen, Counsel for ActBlue, to Rep. Jim Jordan,

On June 27, 2026, over a year after the Committees issued the subpoenas, ActBlue finally produced heavily redacted versions of Ting's resignation letter and Ahmad's internal messages. ActBlue stated that it would only produce the letter and messages in redacted form because "the provision of legal advice was among the significant purposes of the communication[s]."[137] Additionally, ActBlue argued that "even if the Committees were right that each document served a non-legal purpose—which ActBlue does not concede—a multi-purpose communication is privileged" for this reason.[138] Notably, ActBlue redacted all information in the documents regarding misconduct at the company, labeling it as supposed "legal advice."

On July 10, 2026, after additional pressure from the Committees, ActBlue finally produced Ahmad's internal messages in unredacted form. This production came only after the Committees urged ActBlue to again review its privilege assertions. As the Committees explained, Ahmad's internal messages were sent for the purpose of making a claim of retaliation—*not* to obtain or provide legal advice. Based on the surrounding context, it is clear that Ahmad was acting as an employee trying to restore his e-mail access, and not an attorney providing legal advice. There is no indication that any ActBlue employee was seeking to obtain his legal advice.

Contemporaneous evidence also indicates that Ahmad sent the internal messages to an "[information technology] support" messaging thread, unrelated to any legal advisory function, and employees across ActBlue knew in real time that Ahmad had posted a message alleging retaliation.[139] Further, Ahmad sent this message to 277 individuals. Although sending a message to many people does not necessarily destroy privilege, it is evidence that these messages were not intended to be kept confidential.[140] After the Committees raised these facts, ActBlue revised its assertion of privilege and produced the internal messages in unredacted form.

Although ActBlue produced Ahmad's messages in unredacted form to the Committees, ActBlue continues to withhold large portions of Ting's resignation letter because it supposedly contains legal advice. ActBlue's redactions cover the portions of the letter from which the *New York Times* quoted and which reportedly contain information about ActBlue's acceptance of illegal foreign donations.[141] The resignation letter reportedly states that Ting resigned because of his concerns about "ActBlue's past practices for screening political donations from abroad and its past representations to Congress regarding foreign donations and related matters."[142] Ting's letter also reportedly contains information about CEO Wallace-Jones's false statements to

---

Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (Oct. 27, 2025).

137 Letter from Mr. Vincent Cohen, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 26, 2026).

138 *Id*.

139 Internal Message from Zain Ahmad to 277 ActBlue Employees (Feb. 26, 2025, 10:50 PM), *see* Ex. 11; Internal Message from ActBlue Employee to Candace King (Feb. 26, 2025, 11:46 PM), *see* Ex. 25.

140 *See* Fed. R. Civ. P. 502.

141 *See* June 25 document production, *supra* note 8; Reid J. Epstein & Shane Goldmacher, *ActBlue May Have Misled Congress on Vetting Foreign Donations, Its Lawyers Warned,* N.Y. TIMES (Apr. 2, 2026).

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

Congress.[143] However, to date, the Committees have only received heavily redacted versions of this letter. ActBlue defended the redactions of entire portions of the letter, explaining that the document discusses "recommendations related to steps that could be taken to mitigate legal risk for the organization, including with respect to the structure of the legal department."[144] ActBlue's decision to withhold this information materially impedes the Committees' oversight.

[143] *Id.*
[144] Email from Vincent Cohen, Counsel to ActBlue, to Comm. Staff, H. Comm. on the Judiciary (July 2, 2026, 2:30 p.m.).

CONCLUSION

American elections belong to American citizens. ActBlue, one of the largest online political contribution platforms, maintains unserious fraud-prevention practices that allow illegal foreign donations in U.S. elections. The Committees have been conducting oversight of ActBlue's lax fraud-prevention practices since 2024. This third interim report presents new information about ActBlue's unserious approach to fraud prevention.

ActBlue claims that its policies prevent fraudulent political contributions from foreign actors. However, internal ActBlue documents reveal that the platform's feature to verify the identity of donors using a U.S. passport number accepts any combination of digits entered that meets a certain character number. The passport verification feature does not determine whether the entered number is a real U.S. passport number or whether the donor is an American citizen. ActBlue's policies also allow an employee to verify a donor's citizenship on their own, then input a passport number placeholder of "ACTBLUEXX" that skips future verification for the donor. Thus, ActBlue's donor "verification" method is ineffective and allows foreign actors to provide illegal political contributions through ActBlue.

In addition, internal logs show how ActBlue maintains a culture that instructs fraud analysts to err on the side of accepting questionable foreign donations. As these logs highlight, ActBlue employees' manual reviews of flagged foreign donations are often subjective. ActBlue accepts foreign donations, even disregarding red flags that suggest an illegal foreign contribution, due to a policy to give "the benefit of the doubt to the donor." ActBlue's lenient and inconsistent fraud-prevention practices have left the door open for large-scale fraud campaigns on the Democrats' top fundraising platform.

ActBlue's cooperation with the Committees' oversight has been incomplete. ActBlue has continually forced the Committees to compel documents from the company. After the company represented to the Committees that it had produced all responsive documents, an exposé in the *New York Times* quoted from ActBlue documents that the company had not produced. Even today, ActBlue continues to withhold large portions of Aaron Ting's resignation letter and other documents, unpersuasively claiming they are protected by attorney-client privilege. The company's obstruction with the Committees' oversight has prevented a full accounting of the scope of misconduct on ActBlue's platform.

The Committees will continue to pursue the facts to inform potential legislative reform to ensure that American elections are safe, secure, and decided only by American citizens.

INDEX OF EXHIBITS

EXHIBIT NUMBER	TITLE
1	Email from ActBlue Product Manager to ActBlue Staff (Jan. 2, 2024)
2	ActBlue Meeting Agenda & Notes, Sift Percentile Change (July 8, 2024)
3	Email from ActBlue Union to ActBlue Board (Feb. 27, 2025).
4	ActBlue Legal & Compliance Operations Specialist Resignation Letter (Mar. 4, 2025)
5	Email from ActBlue HR Employee to Regina Wallace-Jones (Feb. 26, 2025, 5:01 PM)
6	Internal ActBlue Employee Message (Feb. 21, 2025)
7	Internal Message from Aaron Ting to Candace King (Feb. 14, 2025)
8	Internal ActBlue Employee Message (Feb. 18, 2025)
9	Email from ActBlue HR Staff to Zain Ahmad (Feb. 25, 2025)
10	Internal Message from Candace King to ActBlue Employee (Feb. 26, 2025)
11	Internal Message from Zain Ahmad to 277 ActBlue Employees (Feb. 26, 2025)
12	Memorandum from ActBlue, Slack Announcement for New Passport Verification Feature
13	Memorandum from ActBlue, Procedure for Contributions Made Without a Passport Number
14	ActBlue Employee Contribution Review
15	ActBlue Employee Contribution Review
16	ActBlue Employee Contribution Review

17	ActBlue Employee Contribution Review
18	ActBlue Employee Contribution Review
19	ActBlue Employee Contribution Review
20	ActBlue Employee Contribution Review
21	ActBlue Employee Contribution Review
22	ActBlue Employee Contribution Review
23	ActBlue Employee Contribution Review
24	ActBlue Leave of Absence & FMLA Guidance
25	Internal Message from ActBlue Employee to Candace King (Feb. 26, 2025, 11:46 PM)
26	Internal Messages between ActBlue Employee and Candace King (Feb. 27, 2025)

EXHIBIT 1

Email from ActBlue Product Manager to ActBlue Staff (Jan. 2, 2024)

ActBlue

Redacted @actblue.com>

Release digest - Tues. 1/2/23 [2 mins]

1 message

[redacted]ia Everyone [redacted]
Reply-To: [redacted]
To: Everyone [redacted]

Tue, Jan 2, 2024 at 12:00 PM

Hi everyone,

Happy New Year! Here's where things are starting off for our donors and entity users in 2024:

For entity users, the graduated rollout of **Direct Deposit** as an option resumes next week on Monday 1/8 for 501 c 3, 501 c 4, and non-exempt entities. Select superusers (plus ActBlue staff) are now seeing **QR codes** for their contribution forms ahead of a full release for all users next week.

Contribution forms for first-time donors (a.k.a the multi-step experience) and returning donors (where we have saved/cookied personal info but not payment info) will begin collecting CVV this Thursday 1/4 ('Entry Mode' remains exempt).

This week we're adding tipping capability to the donate modal (or, pop-up) that donors see in Donor HQ, excluding PayPal for now due to technical complexity. Separately our Payment Options Layout Test for first-time donors continues to run and a new test is experimenting with new copy and visual updates to our default recurring upsells.

As always, please get in touch here or via Slack if you have any questions.

[redacted]

Major releases for donors and entity users

In the next 2-4 weeks (subject to change)

EXHIBIT 2

ActBlue Meeting Agenda and Notes, Sift
Percentile Change (July 8, 2024)

Jul 8, 2024 | Sift percentile change

Attendees: [redacted]

Agenda/Notes

- Thought experiment: If we make this change, how would we defend an assertion that we're increasing our risk tolerance / willing to accept more fraud?
  - The changes we've made of the last year have *already* meant we're "accepting" more fraud.
- They're based on a 7-day average and updated every 10 minutes
  - In the event of a fraud attack, will increase percentage.
- This is Sift's "product" going forward. So they may not get rid of "Sift score" entirely, but their perspective is that this is what the product should've always been.
- Would mean only looking at top riskiest cases each day, which is essentially what we're already doing by reverse engineering it
- Example: If we set the percentile at 2%, and all 2% are fraud "and then some," what happens to the "and then some"?
- We can still have signal-specific rules. Can still set rules that flag cases outside of the percentile.

Action items

-

EXHIBIT 3

Email from ActBlue Union to ActBlue Board
(Feb. 27, 2025)

From:	Candace King [redacted]
on behalf of	Candace King [redacted]
Sent:	2/28/2025 2:58:47 AM
To:	Regina Wallace-Jones [redacted]
Subject:	Fwd: ActBlue Union and ActBlue Tech Workers Union Letter to the Board

The old board members received this from the unions.

Candace

---------- Forwarded message ---------
From: **Kimberly Peeler-Allen** [redacted]
Date: Thu, Feb 27, 2025 at 6:33 PM
Subject: Fwd: ActBlue Union and ActBlue Tech Workers Union Letter to the Board
To: Candace King [redacted]

This just landed.

Kimberly Peeler-Allen
[redacted]
Sent from my iPhone

Begin forwarded message:

From: ActBlue Union [redacted]
Date: February 27, 2025 at 8:38:35 PM EST
To: [redacted]
Cc: [redacted]
Subject: ActBlue Union and ActBlue Tech Workers Union Letter to the Board

As staff from across ActBlue, we feel compelled to share our serious concerns about the state of the organization. Over the last two years, we've navigated nearly constant turnover in leadership positions. The dramatic uptick in the last few weeks has indicated an alarming pattern, making it difficult for us to do our work and eroding our confidence in the stability of the organization. In the last few months alone, we've seen the departure of the following leaders:

- Darrin Hurwitz, General Counsel, 1 year 6 month tenure, departed 11/22/2024
- Alyssa Twomey, VP of Customer Service, 14 year tenure, departed 02/21/2025

[redacted]

- Aaron Ting, Associate General Counsel, 15 month tenure, departed 2/24/2025 (five days prior to originally planned departure date)

[redacted]

[redacted]

In the hyper-partisan, tenuous political climate we find ourselves in today, the organization is under increasing scrutiny and is the target of bad-faith political attacks at the hands of ill-intentioned operators. With this context, we are particularly concerned about the departure of leaders who focused on legal and compliance work. Those of us who work with our legal team in our day-to-day do not have clear direction on how to proceed with our work in their absence. We have not received information from the Executive Leadership Team about who will step into these roles or who will lead the defense of our work in the months since Darrin's departure.

Furthermore, in an incredibly alarming development this week, our only remaining Legal Counsel on staff posted in a Slack channel and alluded to possible violations of our Time Off and Leave Policy, Non-Retaliation Policy, and Whistleblower Protection Policy. Their messages were swiftly deleted from the channel without acknowledgement. We find this deeply unsettling and disturbing, and part of a growing pattern of volatility and toxicity stemming from current leadership.

In the wake of all of these high-level departures — and amidst additional drastic changes across the organization — we have been expected to navigate the prolonged vacancy of all of these roles and the lack of clear plans from leadership moving forward. Simultaneously, we are being held to increasingly punitive standards for our work, which has contributed to a demoralizing and distrustful work environment, rather than one that is healthy and collaborative.

As the workers who are crucial to the organization's continued success, and as people with a fundamental interest in seeing ActBlue remain a reliable and trusted platform, we ask the board urgently take the following steps:

- Retain independent outside counsel
- Utilize that independent outside counsel to conduct exit interviews of all of the above leaders and others who have left ActBlue in recent weeks
- Utilize that independent outside counsel to take other investigatory actions to better understand the current state of the organization and evaluate if our CEO is doing her job in an appropriate, competent, and responsible manner
- Take corrective actions based on the findings

Signed,
ActBlue Tech Workers Union (ABTWU) and ActBlue Union (AB1U)

EXHIBIT 4

ActBlue Legal & Compliance Operations Specialist
Resignation Letter (Mar. 4, 2025)

Mar 4, 2025

ActBlue
PO Box 962017
Boston, MA 02196

Dear [redacted],

I would like to inform you of my intention to resign from Legal and Compliance Operations Specialist at ActBlue.

My last day will be April 6, 2025. It is my intention to give ActBlue the most time possible to plan for this change; I will be fully available through my last day, and will assist in any and all transitional work during this period.

I appreciate the opportunities in my tenure here. I wish you and the company the very best going forward.

Sincerely,

[redacted]

EXHIBIT 5

Email from ActBlue HR Employee to Regina Wallace-Jones (Feb 26. 2025, 5:01 PM)

From: [redacted]
Sent: 2/26/2025 5:01:29 PM
To: [redacted]
Subject: Zain Ahmad Leave of Absence Request Received

Hello Regina Wallace-Jones,

We received a Leave of Absence request for your direct report, Zain Ahmad, and it is in process. We'll notify you once it's approved.

We want to keep you informed about the process for employees taking leaves longer than 30 days. During this time, your team member's access to most internal systems will be temporarily restricted. However, they will maintain access to essential tools, specifically email, Slack, UKG, and Confluence.

Here's what we've shared with your team member to ensure a smooth transition:

Update key document access: They've been advised to ensure that important files and systems are accessible to you and the team before their leave begins.

Out of Office Planning: We've provided them with our ActBlue Out of Office Template for additional guidance.

Manager access to GSuite: If needed for business continuity, your team member can request IT to grant you access to their GSuite.

If you need any support or additional guidance for leave planning, feel free to reach out to your People Business Partner.

[redacted]
(she/her/hers)
P&C Operations Analyst | ActBlue
secure.actblue.com

EXHIBIT 6

Internal ActBlue Employee Message (Feb. 21, 2025)

Short Message Report

Conversations: 1	Participants: 3
Total Messages: 22	Date Range: 2/21/2025

Outline of Conversations

[redacted] • 22 messages on 2/21/2025 • [redacted] • [redacted] •
[redacted]

Messages in chronological order (times are shown in GMT +00:00)

[redacted]-[redacted]-[redacted]-[redacted]

[redacted]

[redacted]

>[redacted] [redacted] 2/21/2025, 3:26 PM
I do not think Aaron, Peter, Alyssa were asked - I think it's their choice and they are unhappy

[redacted]

>[redacted] [redacted] 2/21/2025, 3:27 PM
I do know that Aaron was asked to permanently head L&C and instead of accepting he gave his notice

>[redacted] [redacted] 2/21/2025, 3:27 PM
ooof, no in between option?

>[redacted] [redacted] 2/21/2025, 3:28 PM
I think he's been really unhappy with what he's seen while being in the interim role

>[redacted] [redacted] 2/21/2025, 3:28 PM
ahhhh makes sense

EXHIBIT 7

Internal Message from Aaron Ting to Candace King (Feb. 14, 2025, 10:14 PM)

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 4	Date Range: 2/14/2025

Outline of Conversations

[redacted] • 4 messages on 2/14/2025 • Aaron Ting • Candace King

Messages in chronological order (times are shown in GMT +00:00)

[redacted]

AT **Aaron Ting** 2/14/2025, 10:14 PM

Hey friend -- I just met with Regina to let her know that I've decided to leave ActBlue at the end of the month for a new opportunity. I wanted to reach out and make sure you and other ELT members know as well. I've loved working with you and I'm happy to hop on a call later to chat if you have any questions.

> CK **Candace King** 2/14/2025, 10:51 PM

Hi Aaron, thanks for letting me know. This is disappointing news! End of the month is fast approaching so should we schedule time on Tuesday to discuss transition logistics?

> AT **Aaron Ting** 2/14/2025, 10:55 PM

Yes! And I already have a staffing plan that I walked through on a call with Regina to make sure no plates are dropped.

> CK **Candace King** 2/14/2025, 10:56 PM

ohh great! thank you for that. i'll find us a quick 30 min then.
"Aaron Ting" reacted with "raised_hands"

EXHIBIT 8

Internal ActBlue Employee Message (Feb. 18, 2025)

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 29	Date Range: 2/18/2025

Outline of Conversations

[redacted] • 29 messages on 2/18/2025 • [redacted] • [redacted]

Messages in chronological order (times are shown in GMT +00:00)

[redacted]

[redacted]

> [redacted] [redacted] 2/18/2025, 5:07 PM
FYI the only resignation I know of is Aaron that resigned Friday I don't have an end date

> [redacted] [redacted] 2/18/2025, 5:09 PM
oof gotcha

> [redacted] [redacted] 2/18/2025, 5:09 PM
yeah exactly

[redacted]

> [redacted] [redacted] 2/18/2025, 5:10 PM
He resigned to Regina, not sure who else knows and I don't know what other resignations they are talking about

[redacted]

[redacted]

>[redacted] [redacted] 2/18/2025, 5:29 PM
Candace just told me he leaves next week so fast timing for Aaron

>[redacted] [redacted] 2/18/2025, 5:30 PM
woooof

>[redacted] [redacted] 2/18/2025, 5:30 PM
not surprising but man this is all bad timing lol

>[redacted] [redacted] 2/18/2025, 5:32 PM
Yes Im not surprised but frankly it feels like the middle finger to us, why would he get on stage at the all staff as an interim and then quit when he knew he would do that before the all staff and he had been saying he would help us hire the permanent person.... I don't know him at all and dont want to be unfair but not how I would expect someone at that level to handle their departure but I have no clue how he was feeling

>[redacted] [redacted] 2/18/2025, 5:33 PM
Yeah - I've always had a really favorable impression of him, but I guess he was more fed up that we realized.

>[redacted] [redacted] 2/18/2025, 5:34 PM
Yeah based on how he acted seems like it

[redacted]

[redacted]

EXHIBIT 9

Email from ActBlue HR Staff to Zain Ahmad (Feb. 25, 2025)

From: [redacted]
on behalf of [redacted]
Sent: 2/25/2025 5:26:07 PM
To: zahmad@actblue.com
Subject: PNC-163 Medical Leave

Reply above this line.

Hi there, thanks for contacting **People & Culture**! We have received your request and will get back to you soon.

In the meantime, please check out our Confluence space. The space includes information on benefits, P&C FAQs, Payroll FAQs, and more.

View request · Turn off this request's notifications

This is shared with Zain Ahmad.

Powered by [redacted]

EXHIBIT 10

Internal Message from Candace King to ActBlue Employee (Feb. 26, 2025)

Short Message Report

Conversations: 1	Participants: 3
Total Messages: 44	Date Range: 2/26/2025

Outline of Conversations

[redacted] • 44 messages on 2/26/2025 • Candace King • [redacted] • [redacted]

Messages in chronological order (times are shown in GMT +00:00)

[redacted]

CK **Candace King** 2/26/2025, 2:06 AM
Hi Hanna, can you please call me

> [redacted] [redacted] 2/26/2025, 2:07 AM
Huddle?

> CK **Candace King** 2/26/2025, 2:07 AM
Yes please

> [redacted] [redacted] 2/26/2025, 2:07 AM
<No text available>

> [redacted] [redacted] 2/26/2025, 2:51 PM
Hey - just checking in. We still good with the account setup we talked about last night?

> CK **Candace King** 2/26/2025, 2:58 PM
Morning! Yes! We are on hold this morning. Thank you.

> [redacted] [redacted] 2/26/2025, 2:58 PM
:saluting_face:

> CK **Candace King** 2/26/2025, 4:25 PM
hi Hanna. think we're ready to take another step.

> [redacted] [redacted] 2/26/2025, 4:25 PM
👀

> CK **Candace King** 2/26/2025, 4:25 PM
can you grant me access to Zain's gsuite?

> CK **Candace King** 2/26/2025, 4:25 PM
email and drive

> [redacted] [redacted] 2/26/2025, 4:26 PM
Do you want to keep his accounts active?

> CK **Candace King** 2/26/2025, 4:26 PM

yes. he should still be active just unable to access his account himself.

> CK **Candace King** 2/26/2025, 4:26 PM

i'd like to put an out of office up for him

> CK **Candace King** 2/26/2025, 4:27 PM

do we have a general matters legal inbox?

> CK **Candace King** 2/26/2025, 4:27 PM

like the ones we have for HR and IT?

>[redacted] [redacted] 2/26/2025, 4:32 PM

Screenshot 2025-02-26 at 11.32.15 AM.png

<Message sent with an attachment>

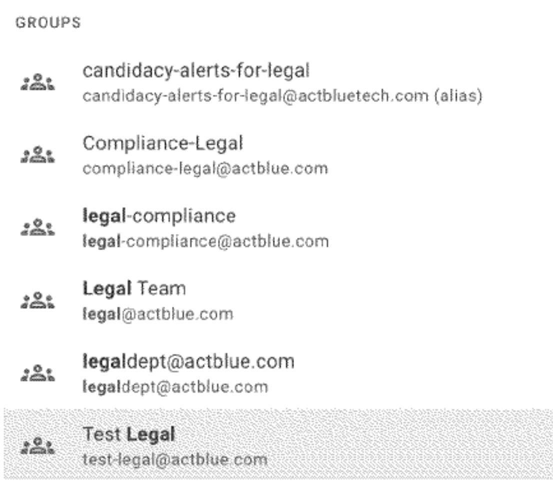


Image: JUNO_APRIL_SLACK00100041285.png (79 KB)

>[redacted] [redacted] 2/26/2025, 4:34 PM

Here's the list of legal accounts

>[redacted] [redacted] 2/26/2025, 4:34 PM

Trying to figure out how to get you into Zain's account while keeping it active and tied to Okta

> CK **Candace King** 2/26/2025, 4:36 PM

ok and who has access to the <mailto:legal@actblue.com|legal@actblue.com> box? is that all internal counsel and compliance?

> [redacted] [redacted] 2/26/2025, 4:37 PM

Screenshot 2025-02-26 at 11.37.06 AM.png

<Message sent with an attachment>

Member	Email/ID	Role	Type
Ann Koppuzha	akoppuzha@actblue.com	Member	User
Lucy Giordano	giordano@actblue.com	Member	User
Joanna Pelayo	jpelayo@actblue.com	Owner	User
Josh Roselman	jroselman@actblue.com	Member	User
[illegible] Patel	mpatel@actblue.com	Member	User
Zain Ahmad	zahmad@actblue.com	Manager	User

Image: JUNO_APRIL_SLACK00100041290.png (138 KB)

> CK **Candace King** 2/26/2025, 4:37 PM

perfect!

> CK **Candace King** 2/26/2025, 4:37 PM

thank you

> CK **Candace King** 2/26/2025, 4:38 PM

cna we remove Josh Roselman?

> [redacted] [redacted] 2/26/2025, 4:38 PM

done

> CK **Candace King** 2/26/2025, 4:38 PM

thank you!

> CK **Candace King** 2/26/2025, 4:52 PM

Can we also update Zain's out of office please? email replies should read

Please be advised that I am currently out of the office and will have limited access to email.
If you require immediate assistance, please contact <mailto:legal@actblue.com|legal@actblue.com>.
Thank you for your understanding.

> CK **Candace King** 2/26/2025, 5:23 PM

note the legal was misspelled so i just fixed that for the OOO
"Hanna Bonin" reacted with "thank_you"

> CK **Candace King** 2/26/2025, 6:10 PM

Hi Hanna, i just received a message from Zain in email!

> CK **Candace King** 2/26/2025, 6:11 PM

i thought he was suspended.

> CK **Candace King** 2/26/2025, 6:14 PM

can we hop on a huddle?

>[redacted] [redacted] 2/26/2025, 6:18 PM

<No text available>

>[redacted] [redacted] 2/26/2025, 6:45 PM

OK

>[redacted] [redacted] 2/26/2025, 6:51 PM

I'm not in panic mode anymore. Here's the login to Zain's account: https://share.1password.com/s#kG47WqqPVGb-RJ2QX5KMf7MnXXyI-jNMQi_CFMmajO8
• This link will expire in 30 days, I recommend you save it in your 1password account
• Open an incognito window in chrome (Command + Shift + N) when you have a chrome window open - go to actblue.okta.com and login with his username and password and the OTP password when it prompts you, second line w/the numbers in the 1Pass Login
• This is giving you direct access to email and drive via his okta homepage just like your primary account
Troubleshooting how he was able to send email: his account was suspended, not deactivated so our automation didn't trigger to clear his cache and cookies! This was a miss on my part, I assumed it would follow our typically sign out rule of a "deactivation" that we normally do for an offboarded person but we never set it up for folks on medical leave because they typically still need access to email.
I'm sharing an item with you using 1PasswordA password manager, digital vault, form filler and secure digital wallet. 1Password remembers all your passwords for you to help keep account information safe.

<Message sent with an attachment>

Image: JUNO_APRIL_SLACK00100041304.png (164 KB)

>[redacted] [redacted] 2/26/2025, 6:51 PM

Happy to hop on a huddle if you need help with any of this!

> CK **Candace King** 2/26/2025, 6:53 PM
yes please!

> CK **Candace King** 2/26/2025, 6:53 PM
huddle

> [redacted] 2/26/2025, 6:53 PM
<No text available>

> CK **Candace King** 2/26/2025, 11:19 PM
Hanna, i'm receiving wind that Zain was posting in ITsupport and it was pulled down somehow? I dont' see anything

> [redacted] 2/26/2025, 11:19 PM
I deleted it

> [redacted] 2/26/2025, 11:20 PM
I'm also getting text messages from unknown phone numbers about it too

> [redacted] 2/26/2025, 11:20 PM
and like Courtney and Danielle are pinging me to restore access

> CK **Candace King** 2/26/2025, 11:20 PM
we are not restoring access

> [redacted] 2/26/2025, 11:21 PM

EXHIBIT 11

Internal Message from Zain Ahmad to 277 ActBlue Employees (Feb. 26, 2025)

Short Message Report

Conversations: 1	Participants: 277
Total Messages: 7	Date Range: 2/26/2025

Outline of Conversations

[redacted]

Messages in chronological order (times are shown in GMT +00:00)

help-itsupport

HB Hanna Bonin 2/26/2025, 10:56 PM

At 02/26/2025 10:56:55 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 10:50:20 PM Zain Ahmad says: Hello IT! I noticed that my access to email, Confluence, and other essential platforms was revoked this morning. Could you please restore my email access and Confluence access?

Pursuant to our Leave Policy and the Confluence page that outlines steps for medical leave, employees should still have access to essential platforms like email, Confluence, Slack, etc.

> HB Hanna Bonin 2/26/2025, 11:05 PM

At 02/26/2025 11:05:24 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:00:28 PM Zain Ahmad says: Hi! Someone in IT deleted my request. Could you please restore my access to email, Confluence, and other essential platforms in accordance with our Leave Policy, Employee Handbook, and other company policies and guidelines?

> HB Hanna Bonin 2/26/2025, 11:05 PM

At 02/26/2025 11:05:29 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:01:25 PM Zain Ahmad says: Please be advised that we have Anti-Retaliation and Whistleblower Policies for a reason.

> HB Hanna Bonin 2/26/2025, 11:05 PM

At 02/26/2025 11:05:35 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:04:13 PM Zain Ahmad says:
Attachment: Time Off and Leave Policy

Time Off and Leave Policy

<Message sent with an attachment>

Attachment: JUNO_APRIL_SLACK00300000037.pdf (172 KB)

> HB Hanna Bonin 2/26/2025, 11:05 PM

At 02/26/2025 11:05:50 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:04:29 PM Zain Ahmad says:
Attachment: Non-Retaliation Policy

Non-Retaliation Policy

<Message sent with an attachment>

Attachment: JUNO_APRIL_SLACK00300000039.pdf (119 KB)

> HB **Hanna Bonin** 2/26/2025, 11:05 PM

At 02/26/2025 11:05:58 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:05:53 PM Zain Ahmad says: Please stop deleting my requests. You are violating the laws and policies of our company.

> HB **Hanna Bonin** 2/26/2025, 11:06 PM

At 02/26/2025 11:06:31 PM Hanna Bonin deletes message:
Original Message:
At 02/26/2025 11:04:40 PM Zain Ahmad says:
Attachment: Whistleblower Protection Policy

Whistleblower Protection Policy

<Message sent with an attachment>

Attachment: JUNO_APRIL_SLACK00300000041.pdf (110 KB)

EXHIBIT 12

Memorandum from ActBlue, Slack Announcement
for New Passport Verification Feature

SLACK ANNOUNCEMENT

Hello Team DS! As of Monday, the new **passport verification feature** for US citizens living abroad is **LIVE** for all AB Express users.

What does this mean: New AB Express users who enter an international address upon setting up their account will be prompted to verify their U.S. passport information via Stripe. Existing Express users who have an international address on file will also find this prompt by navigating to their AB Express Profile from the Donor Dashboard.

How does it work: Watch this video demo!

Why the change: By using this method, we reduce our own risk of transmitting invalid or fraudulent donations and beef up the security around the highly sensitive information we're required to ask of these donors. This is a huge win for AB and for donors!

Handling inquiries: We've created a new macro **ActBlue Info::Passport Verification Process Explanation** to explain the reason for this new process and instructions on how to complete it. For other inquiries, please escalate to the following:

- **Managers**: Donors who may be mistrusting of the feature, and any spicy donors.
- **Troubleshooting:** All technical questions related to the feature.

Please reach out with any questions and concerns as they come up!

PROPOSED MACRO

Thank you for reaching out to ActBlue! I'm sorry for any confusion or frustration caused by our passport verification process, and I'm happy to assist.

The Federal Election Commission (FEC) requires political candidates and committees to collect a donor's U.S. passport number when they provide a foreign address. In our ongoing effort to make political giving as safe and accessible as possible for our small-dollar donors overseas, we have partnered with Stripe to ensure a more secure and streamlined process.

To complete this verification process, please follow these steps:

1. Once logged in to your ActBlue Express account, click on the "Account" dropdown menu on the top right of the screen, select "ActBlue Express Profile," and click the button marked "Verify identity with passport" to proceed.
2. You will be prompted to review information from ActBlue and Stripe regarding the use of your data. Click "Agree and continue" to proceed.
3. You will be shown a QR code to scan and complete the verification process on your mobile device.

    a. Alternatively, you can select “Other options” to have the link emailed or texted to the device of your choice, or to “Continue on this device,” provided it is equipped with a front-facing camera.
4. Use the camera on your chosen device to take a clear photo of your U.S. passport which will be verified by Stripe.

Please let me know if you have any additional questions or concerns!

Best,

RELATED DOCUMENTS

Video demo
Confluence: Passport Verification for International Donors
Confluence: Improve Donor Passport Requirements
help.actblue.com: I'm a U.S. citizen living abroad. How can I donate?
Stripe: Managing your ID verification information
Stripe: Uploading photo of government-issued ID FAQ

EXHIBIT 13

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

{This procedure is posted in the Customer Service Confluence site.]

Procedure for Contributions Made without a Passport Number

Background

Federal campaign finance law prohibits contributions made by foreign nationals. Foreign nationals are defined as someone who is not a citizen or permanent resident of the United States. The prohibition extends to anybody who is not a U.S. citizen and does not live in the United States on a permanent basis. This includes people who live in foreign countries and people from foreign countries who are only here temporarily (such as exchange students). It does not include U.S. citizens who are living abroad or people who have immigrated to the U.S., but have not gained citizenship.

The prohibition applies to *all political contributions in the United States*. Someone who is not a citizen or a permanent resident may not make a contribution to a federal candidate, committee, or political party, and also may not make a contribution to a state or local candidate, committee, or political party. It prohibits political contributions of any kind, at any level of government. It does not, however, prohibit contributions to other types or organizations we work with, such as charitable organizations. Any organization which is not political in nature is still permitted to accept contributions from a foreign national.

Recently, we built a tool to assist campaigns and committees using our site to verify that contributors are U.S. citizens or permanent residents. If someone enters an address when making a contribution that includes a country other than the United States, they see a popup in the contribution flow requesting their passport number. This is a method approved by the FEC for confirming citizenship or permanent residency. If the contributor does not enter a passport number, they cannot complete their contribution. We use some very basic validation -- number of characters -- to ensure that the number entered is a valid passport number, but we do not verify the information in any other way. We do not, for instance, check the information provided against a government database. We merely store the information and continue with the contribution flow.

When the contributor does not have a passport number

It is the rare occasion when someone who is either a U.S. citizen or permanent resident will not be able to provide us with an address in the United States or a passport number. A permanent resident by definition must have an address in the United States. A U.S. citizen who is abroad will in most cases have a U.S. passport and will be able to provide the number. However, there do seem to be some circumstances under which a citizen genuinely does not have either a U.S. address or a passport. For instance, if someone is born to a U.S. citizen living in a foreign country and has never lived in the United States, they may never have obtained a U.S. passport. There are likely other atypical circumstances under which someone might be a citizen, but doesn't not have a passport, and therefore they cannot enter a passport number into the contribution form even though they are eligible to make a contribution.

When this occurs, we need to take additional steps to verify that the contributor is a citizen or permanent resident and therefore eligible to make a contribution. The easiest and safest method of verifying is for the person to provide a residence address in the United States. If the contributor is abroad (serving in a consular office, for example) but does have an address in the U.S. which is where they typically reside, that is the address they should use to make a contribution. So the first step should be to ask the contributor if there they have a residence address -- even if they are temporarily living somewhere abroad at the moment -- that they can use.

If the contributor doesn't have a passport or an address in the United States, then the next step is to determine what alternative method of verifying the person's citizenship might be appropriate. By this point, most likely the contributor has explained why they cannot provide a passport number. But if they have not said, this is the time to ask about their situation. It is appropriate to explain that the law prohibits anyone who isn't a citizen or permanent resident of the U.S. from making political contributions, and then ask about their citizenship. Once they have provided the details, the legal department will need to consider whether there is additional explanation or documentation we will need to request, or if we have been given sufficient verification of U.S. citizenship.

Once the contributor's citizenship has been verified, that contributor's account will need a placeholder in the passport number field of their ActBlue account so that they are not required to enter a passport number with subsequent contributions. The text "ACTBLUEXX" should be entered into the account. Additionally, we will need to keep track of the cases where we have verified citizenship outside of the contribution flow. The details of the particular situation should be recorded in this Google spreadsheet. All requests, whether citizenship is ultimately confirmed and the contribution made or not, should be logged in this spreadsheet. Including every request allows us to keep track of how many cases ultimately end up with no contribution made.

Summary

Here is a quick summary of the steps to take when someone who is a United States citizen attempts to make a contribution using an address outside of the U.S. and doesn't have a passport:

1. Encourage the contributor to us a U.S. address if they are living abroad temporarily and have a permanent address here.
2. If the contributor hasn't yet explained why they are a U.S. citizen outside the country, but doesn't have a U.S. passport, explain that the law prohibits contributions from someone who is not a U.S. citizen or permanent resident and ask about their citizenship.
3. Contact [redacted] or [redacted] in the legal department and explain the situation. They will record the case in the Google spreadsheet and determine whether additional explanation or documentation is required.
4. Once the contributor's citizenship is verified, enter the text "ACTBLUEXX" into the passport number field of the contributor's account to allow them to complete their contribution and make future contributions.

EXHIBIT 14

ActBlue Employee Contribution Review

Period covering 9/1/24 - 9/30/24

[redacted] had reviews for all assigned shifts. Great job!

[redacted] had below the median reviews per shift, just inside the middle 25%. Her rejection rate was very high compared to the median of the team. If there really were that many contributions to reject, that is okay, but please double check that you are not rejecting contributions that are donating imperfectly (an abreviated name, for example) and only likely fraud cases.

Had no escalations in this time period. Please be mindful to flag any contributions you are unsure about and importantly proactive outreach opportunities.

Audit:
"1. AB[redacted] - Great accept! Nothing suspicious about this donor. They should be scored much lower by Sift!
2. AB[redacted] - Great accept! Donor has a PR billing address (which is totally fine) and a Miami IP address (a common place for people in the Carribean to visit).
3. AB[redacted] - I disagree with rejecting this donation. The donor is foreign, but correctly entered their billing address, so they would be prompted for their passport number. Their IP/billing are also tightly clustered together. We can accept this type of donation and the campaign will verify their passport number. Also, please remember to add a case comment if you reject a donation so the next associate who reviews that donor knows why you rejected!"

EXHIBIT 15

ActBlue Employee Contribution Review

Period covering 2/1/23 - 3/31/22

[redacted] worked all of her shifts, great job!

She reviewed a healthy amount of contributions. She had above average numbers of both reviews/shift and rejections/review.

I agree with the rejection of AB[redacted]. IP/billing/CC country mismatch and the billing address matches a restaurant and not a residential one.

I am actually okay with accepting AB[redacted] rather than rejecting. It is a foreign contribution to a political organization, but the donor used the correct country code (they have a billing/IP/CC country match), so they would need to enter a passport number.

Great escalations of proactive outreach situations and making connections between similar email addresses, as with AB[redacted]. Request to all Sifters to investigate more deeply and

Period covering 10/9/22 - 1/31/22

[redacted] usually falls on the above side of average reviews per shift and often had above the

EXHIBIT 16

ActBlue Employee Contribution Review

Period covering 2/1/23 - 3/31/23

I changed the column "shifts missed" to "shifts without reviews", which is more accurate and non-accusatory. I noticed that of the two shifts assigned to [redacted] in this period, there was one where she did not have reviews. Volume is very low at the moment, so was this just two instances where there was nothing to review, or shifts [redacted] missed? If it is the latter, I want to make sure everyone feels comfortable with/remembers to mark themselves OOO. If it is the former, then ignore this!

[redacted] was not given much to review, so it is difficult to draw any meaningful insights about her reviews/shift or reject rate. She had no rejections, which at such a low volume is reasonable.

I could go either way on AB[redacted]. I don't necessarily disagree with [redacted]'s decision, and as we have said, we give the benefit of the doubt to the donor. However, this donor has a few red flags, such as IP/billing mismatch and a concerning IP provider name, a foreign credit card, an odd email domain, and being connected to other rejected users via browser fingerprint. I can't say for sure that this is fraud, so I am good with the accept, but one worth discussing!

Period covering 10/9/22 - 1/31/23

[redacted] did not work in the workflow during this period.

EXHIBIT 17

ActBlue Employee Contribution Review

Period covering 2/1/23 - 3/31/22

[redacted] did not miss any assigned shifts in this time period. Great job!

She had a low number of contributions to review, which makes sense given that she only had two shifts, so it is hard to draw meaningful insights from her metrics, but she was on the below side of reviews/shift and the below side of rejections/review.

I would accept AB[redacted]. The donation amount is big, but everything else about the donation is okay.

Contribution AB[redacted] set off a lot of Sift's alarms but I agree with [redacted] in giving them the benefit of the doubt and accepting this.

[redacted] had no escalations in the time period, which is normal given the low volume she had to review (as long as she feels comfortable with all of her reviews). Request to all Sifters to investigate more deeply and escalate proactive outreach issues while volume is low.

Period covering 10/9/22 - 1/31/22

[redacted] did not work in the workflow during this period.

EXHIBIT 18

ActBlue Employee Contribution Review

Period covering 7/1/24 - 7/31/24

[redacted] did not have shifts to generate reviews per shift. He had very close to the average rejection rate.

No escalations in this period. Please keep an eye open for proactive outreach opportunities.

Audit:
"1. AB[redacted] - Great accept. Donor has an abreviated first name, so good for a proactive outreach escalation
2. AB[redacted] - Great accept. Donor has a few foreign IPs but they are all consistently in the same place.
3. AB[redacted] - Great reject. Name is full of odd characters. Please remember to add case comments for rejections!"

EXHIBIT 19

ActBlue Employee Contribution Review

Period covering 2/1/23 - 3/31/22

I changed the column "shifts missed" to "shifts without reviews", which is more accurate and

Period covering 10/9/22 - 1/31/22

[redacted] should have accepted AB[redacted]. Previously accepted donations, tight IP/billing, nothing suspicious about it.
[redacted] both accepted and rejected contributions from [redacted].
[redacted] should have accepted AB[redacted]. Nothing suspicious about this c3 donation
[redacted] should have accepted AB[redacted]. The only odd thing about it is that the donor used the Alaska state code for a foreign donation but our system is kind of weird with state codes and they don't even need an address for a c3 donation. Name/email match, IP/billing match
[redacted] should have accepted AB[redacted]. It is a foreign contribution, but the name/email match, the IP/billing match, a full address with the correct country code, and there were previously accepted and successful contributions. The donor uses an Arkansas state code which isn't great, but our system can be wonky with requiring state codes for foreign donors.
[redacted] should not have rejected contributions from [redacted]

I will be on the lookout for excellent reviews in the future to share with her for reinforcement. Would you be comfortable with me sharing a review of yours with which I agree with the whole team? How about one with which I disagreed?

Please remember to add a case comment with information about your decision before rejecting

EXHIBIT 20

ActBlue Employee Contribution Review

Period covering 6/1/24 - 6/30/24

[redacted]

Above average reviews per shift, and slightly lower than average rejection, but close to the average

No escalations in this period. Please keep an eye open for proactive outreach opportunities.

Audit:
"1. AB[redacted] - Great accept. Frequent flyer without any suspicious characteristics.
2. AB[redacted] - Great accept. Donor sometimes has an IP in Hong Kong but none of their other signals raise any eyebrows.
3. AB[redacted] - I disagree with this reject. You are right that their IP/billing are mismatched, and a Romanian IP definitely raises some questions. But you wrote in the case comment (which I greatly appreciate) that their name on their X profile is different, but when I click it, it looks like its the same name, plus all their tweets are in support of Democrats. I overturned this

EXHIBIT 21

ActBlue Employee Contribution Review

Period covering 2/1/23 - 3/31/22

[redacted] worked both her assigned shifts, great job!

It is hard to draw conclusions from low volume, but [redacted]'s numbers look good! She had above the average of reviews/shift and below the average of rejections/review.

Accept of donation AB[redacted] is good! Its odd that all signs point to this person being from Canada but they used a Missouri billing address, but Twitter seems to confirm that they are a real person!

[redacted] had no escalations in the time period, which is normal given the low volume she had to review (as long as she feels comfortable with all of her reviews). Request to all Sifters to investigate more deeply and escalate proactive outreach issues while volume is low.

Period covering 10/9/22 - 1/31/22

There is not a large sample size for [redacted] so please take these perspectives with a grain of salt.

EXHIBIT 22

ActBlue Employee Contribution Review

Period covering 2/1/23 - 3/31/22

I changed the column "shifts missed" to "shifts without reviews", which is more accurate and non-accusatory. I noticed that of the four shifts assigned to [redacted] in this period, there were two where she did not have reviews. Volume is very low at the moment, so was this just two instances where there was nothing to review, or shifts [redacted] missed? If its the latter, I want to make sure everyone feels comfortable with/remembers to mark themselves OOO. If it is the former, then ignore this!

[redacted] was not given much to review, so it is difficult to draw any meaningful insights about her reviews/shift or reject rate.

No overturned decisions. I like that you accepted AB[redacted]. Even though they have some IP/Billing mismatches, it seems like this is a real donor, reinforced by them having a LinkedIn.

[redacted] had no escalations in the time period, which is normal given the low volume she had to review (as long as she feels comfortable with all of her reviews). Request to all Sifters to investigate more deeply and escalate proactive outreach issues while volume is low.

Period covering 10/9/22 - 1/31/22

[redacted] is often very close to the team average in reviews per shift and rejections per review.

EXHIBIT 23

ActBlue Employee Contribution Review

Period covering 7/1/24 - 7/31/24

[redacted] had reviews for all shifts she was assigned. Great job!

[redacted] had below the average reviews per shift and above the average rejection rate.

Great job escalating a chargebacks issue for [redacted]!

Audit:
"1. AB[redacted] - I agree with this accept. They use a credit card from the Congo, but that alone isn't reason to reject. She sometimes uses a prepaid card from the Congo, and those get autorejected, but I think they are a legit donor.
2. AB[redacted] - Great accept. Nothing suspicious about the donor. They use a prepaid card but that alone isn't reason for us to reject.
3. AB[redacted] - I disagree with this rejection. Yes, the donor is foreign-based, but all of the information is consistent, i.e. they have a CL credit card, email, and address. They would be prompted for a passport number. Please remember to add case comments for rejections\"

EXHIBIT 24

ActBlue Leave of Absence & FMLA Guidance

Leave of Absence & FMLA Guidance

This page provides guidance for ActBlue staff regarding Leave of Absence and Family and Medical Leave Act (FMLA), including employee eligibility, reasons for leave, and the amount of leave available. It outlines various leave options, such as military caregiver leave, personal leave, and domestic violence leave, while emphasizing job protection and confidentiality. Additionally, it details employee rights, responsibilities, and the continuation of pay and benefits during approved leaves.

? For more questions on Leave of Absence and FMLA, please contact [redacted]@actblue.com
All conversations and documentation will be handled confidentially.

Table of Contents

Definitions

ActBlue uses **Tilt** as our official leave management platform. Tilt is our partner in guiding employees through the entire leave process from start to finish. To begin your leave, you'll need to **submit your request directly through the Tilt platform**

How to Submit a Leave of Absence in Tilt

1. Log into Tilt using SSO in Okta or by using Rippling
2. **Start Your Leave Request**
   Click the **"Request a Leave"** button on your Tilt homepage to begin.
3. **Complete the Leave Form**
   Provide the required details, including:
   - Type of leave (e.g., medical, parental, personal)
   - Job title, location, and scheduled hours
   - Anticipated start and return dates
   - Personal contact info and communication preferences
4. **Submit Your Request**
   Click **"Submit"** once the form is complete. You'll receive a confirmation on your dashboard, and your request will move to review.
5. **Tilt and P&C Review Process**
6. Your request will first be reviewed by the P&C team.
7. Then, a **Tilt Leave Success Manager** will create your custom leave plan.
8. You'll be notified when your leave plan is finalized, typically within 5–7 business days.

Need to Update Your Request?

If your leave status is still "Waiting on Employee," you can edit the request directly in Tilt. Once it's marked as "Under Review," updates may need to wait until your leave plan is published.

Family and Medical Leave Act (FMLA)

ActBlue complies with and expands upon the federal Family and Medical Leave Act (FMLA), in addition to applicable state and local leave regulations. Under the FMLA, eligible employees are granted up to 12 weeks of job-protected leave during a 12-month period (or up to 26 weeks of military caregiver leave). Unless required by specific state requirements, FMLA leave is not paid, but oftentimes run concurrently with a different leave option that provides pay and benefits to the employee.

📝 **Eligibility**

To be eligible for FMLA leave, employees must meet **all** of the following requirements:

- Be actively employed with ActBlue when the leave begins.
- Have worked at least twelve (12) months for ActBlue. The 12 months of employment do not have to be consecutive. All periods of absence from work due to or necessitated by service in the uniformed services are counted as hours worked in determining eligibility.
- Have worked at least 1,250 hours for ActBlue over the twelve (12) months preceding the date the leave would commence.

☑️ **Applicable FMLA Reasons**

To qualify as FMLA leave under this policy, the leave must be for one of the following reasons:

- The birth of a child or placement of a child with the employee for adoption or foster care.
- To care for a spouse, domestic partner, child, or parent who has a serious health condition.
- For a serious health condition that makes the employee unable to perform the essential functions of his or her job.
- For any qualifying exigency arising out of the fact that a spouse, domestic partner, child, or parent is a military member on covered active duty or on call to covered active duty status.
- To care for a covered service member with a serious injury or illness.

🕓 **Amount of Leave**

An eligible employee can take up to 12 weeks of FMLA leave during any 12-month period. ActBlue will measure the 12-month period as a rolling 12-month period measured backward from the date an employee uses any leave under this policy. Each time an employee takes FMLA leave, the amount of time taken under this policy in the last 12 months will be subtracted from the 12 weeks of available leave, and the balance remaining is the amount the employee is entitled to take at that time. Note, that ActBlue may grant additional time off for employees based on need, applicable law, and business circumstances.

🎖️ **Military Caregiver Leave**

An eligible employee can take up to 26 weeks for the FMLA military caregiver leave during a single 12-month period. For this military caregiver leave, the company will measure the 12-month period as a rolling 12-month period measured forward. FMLA leave already taken for other FMLA circumstances will be deducted from the total of 26 weeks available.

📅 Intermittent Leave or Reduced Work Schedule

Employees may take FMLA leave in one consecutive block of time, may use the leave intermittently (take a day periodically when needed over the year), or, under certain circumstances, may use the leave to reduce the workweek or workday, resulting in a reduced hour schedule.

Under the FMLA, employers may temporarily transfer an employee to an available alternative position with equivalent pay and benefits if the alternative position would better accommodate the intermittent or reduced schedule in instances when leave for the employee or employee's family member is foreseeable and for planned medical treatment, including recovery from a serious health condition or to care for a child after birth or placement for adoption or foster care.

For the birth, adoption, or foster care of a child, the company and the employee must mutually agree to the schedule before the employee may take the leave intermittently or work a reduced-hour schedule. Leave for birth, adoption or foster care of a child must be taken within one year of the birth or placement of the child.

When leave is needed for planned medical treatment, the employee must make a reasonable effort to schedule treatment so as not to unduly disrupt the company's operations.

📣 Employee Notice Requirement

Under the FMLA, employees requesting FMLA leave must provide verbal or written notice of the need for leave to their manager or P&C Manager. ActBlue encourages folks to reach out to [redacted]@actblue.com directly for leave planning support.

If the need for leave is expected, the employee should give ActBlue a minimum of 30 days' notice or as much notice as possible. In situations where the need for FMLA leave is unforeseen, the employee should notify ActBlue by the next business day unless they are unable to do so. In the case of incapacitation, they should inform ActBlue as soon as possible or have a personal designee contact us in their absence.

Within five business days after the employee has provided this notice, P&C will complete and provide the employee with a Notice of Eligibility and Rights and request a medical certification or other supporting documentation as necessary.

🗓️ Designation of FMLA Leave

Within five business days after the employee has submitted the required certification or other documentation, P&C will complete and provide the employee with a written response to the employee's request for FMLA leave using the FMLA Designation Notice.

Intent to Return to Work from FMLA Leave

Employees should notify their Manager and P&C of any changes to their employment status or return to work date when applicable. On a basis that does not discriminate against employees on FMLA leave, ActBlue may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

Medical Leave

ActBlue provides every benefits-eligible, permanent employee with short-term disability and long-term disability insurance through MetLife insurance at no cost to staff. Employees taking a medical leave of absence are generally eligible to file a claim for short-term disability. Pending claim acceptance, employees receive up to 60% of their regular weekly wages through MetLife (up to a maximum of $2,500/week, less taxes) for a period of up to 12 weeks. The remaining 40% of wages are paid by ActBlue via regular payroll.

- For more details on STD please review MetLife STD--Employee Summary.pdf
- For more details on LTD please review MetLife LTD--Employee Summary

Parental Leave*

**Non-represented employees only. Represented employees please refer to your applicable CBA.*

Employees will be granted twenty (20) weeks of paid leave for parental leave. Parental leave must be taken during the first twelve (12) months following the child's birth or placement of the child with the Employee for adoption or foster care. Leave can be taken continuously or intermittently. Non-birthing and adoptive parents are also eligible for Parental leave. This leave runs concurrently with FMLA if applicable. Employees represented by a collective bargaining agreement should refer to their CBA for parental leave options.

Military Leave

ActBlue provides military leave for employees who serve in the United States Armed Forces, including the National Guard and Reserves, to take time off from their civilian jobs to fulfill their military obligations. This leave is designed to protect the employment rights of those who are called to active duty, training, or deployment.

- **Eligibility**: Applies to employees who are members of the Armed Forces, including the National Guard and Reserves.
- **Duration**: The length of leave depends on the duration of the military service or training. Employees are entitled to the full period required for their duty, including recovery time for

service-related injuries.

- **Job Protection**: Under the Uniformed Services Employment and Reemployment Rights Act (USERRA), employees on military leave are entitled to return to their civilian job with the same status, seniority, and benefits as if they had not been absent.

🕵 Witness Protection Leave

ActBlue provides leave options for witness protection that allows employees who are involved in legal proceedings as witnesses to take time off from work without jeopardizing their employment. This leave is designed to support individuals who may be required to testify, provide evidence, or participate in legal processes under subpoena or court order, particularly in cases where witness protection is necessary for their safety.

- **Eligibility**: All employees who are required by law to testify or participate in legal proceedings as witnesses, especially those placed in witness protection programs.
- **Duration**: The duration of the leave depends on the length of time the employee is required to be involved in the legal proceedings. This could range from a single day to an extended period, depending on the case.
- **Job Protection**: Employees on Witness Protection Leave are entitled to job protection, meaning their position or an equivalent one will be available to them when they return from leave.
- **Confidentiality**: For employees in witness protection, additional confidentiality measures may be taken to ensure their safety and privacy during and after their leave.

Domestic Violence Leave

ActBlue offers domestic violence leave that allows employees who are victims of domestic violence, sexual assault, stalking, or other forms of abuse to take time off from work to address personal, legal, and safety needs related to the situation. This leave is designed to support individuals as they navigate the complexities of dealing with abuse while maintaining job security.

- **Eligibility**: Employees who are victims of domestic violence, sexual assault, stalking, or other abuse, or who need to support a family member facing such issues.
- **Permitted Uses**:
  - Seeking medical attention for injuries related to the abuse.
  - Obtaining legal assistance, including filing for protective orders or attending court proceedings.
  - Receiving counseling or mental health services.
  - Relocating to ensure safety for themselves or their family.

    - Attending to other necessary activities related to the violence or abuse, such as meeting with law enforcement.
- **Duration**: The length of leave varies by jurisdiction, but it generally provides sufficient time to address immediate safety, legal, and medical needs.
- **Job Protection**: Employees are entitled to job protection during domestic violence leave, meaning they cannot be penalized for taking time off for these reasons, and their position or an equivalent role will be available upon their return.
- **Confidentiality**: Employers are often required to maintain confidentiality regarding an employee's use of domestic violence leave, to protect their privacy and safety.

Personal Leave

A personal leave of absence may be reviewed and considered when an individual needs to take time off, beyond PTO, due to extreme or extenuating circumstances that are not covered by other ActBlue leave options (e.g., parental, medical, or family leave). These situations are reviewed carefully to ensure they meet specific criteria, and the leave may be granted based on the nature of the request and organizational needs. Personal leave is intended for exceptional cases where other leave types do not apply, and it is typically reserved for serious personal matters that require extended time away from work.

Leave Options Under the ADA (Americans with Disabilities Act)

Under the ADA, employees with a qualifying disability may be entitled to additional leave as a reasonable accommodation if they are unable to perform the essential functions of their job due to their condition. This leave may be provided even if the employee is not eligible for FMLA or has exhausted their FMLA leave. The ADA does not set a specific duration for leave, but the amount of leave provided must be reasonable and not impose undue hardship to ActBlue.

In addition to extended leave, employees returning from ADA-related leave may also request reasonable accommodations, such as modified duties, adjusted schedules, or assistive devices, to help them successfully transition back to work. The goal of ADA leave accommodations is to ensure employees with disabilities have the support they need to remain employed, while balancing the needs of the business.

ActBlue is committed to working with employees to explore reasonable accommodations, including leave, to support their health and well-being under ADA guidelines. For additional support or questions on accommodation visit our resource page.

State Specific Quick Links

California

- CA Disability Paid Family Leave

Colorado

- CO FAMLI

Connecticut

- CT Paid Family and Medical Leave

Washington, D.C.

- D.C. Universal Paid Leave

Massachusetts

- MA Paid Family & Medical Leave

New Jersey

- NJ Temporary Disability Insurance
- NJ Family Leave Insurance

New York

- NY Disability Insurance
- NY Paid Family Leave

Oregon

- OR Paid Family Leave

Washington

- WA Paid Family & Medical Leave

Guidance

Pay and Benefits Continuation

In most cases, employees on leave will continue to receive full pay along with uninterrupted health benefits. People & Culture will work to coordinate employees' pay and benefits throughout their leave whenever possible. However, for state-run disability and paid family leave programs, employees will need to apply for those benefits directly. P&C will provide the necessary guidance and resources to help employees navigate these state programs in conjunction with ActBlue's benefits. It's important to note that under no circumstances will an employee's combined state and ActBlue pay exceed 100% of their usual earnings.

Throughout an approved leave of absence, health insurance benefits—such as medical, dental, vision, and company-paid disability and life insurance—will remain active and uninterrupted. Employees enrolled in voluntary benefits, such as supplemental life insurance or FSA plans, will be required to maintain their monthly premium payments, which are typically deducted from their regular payroll. Upon returning from leave, employees will be responsible for covering any payments for employee-elected benefits.

📄 Out-of-Office Template

This guide is designed to support employees and their managers in planning for an extended absence.

🔄 Employee Status During Leave

To prioritize your well-being, ensure uninterrupted time off, and uphold security best practices, ActBlue will temporarily restrict access to most internal systems for leaves longer than 30 days. This approach allows you to fully disconnect and recharge during your time away.

While access to most systems will be paused, essential tools such as email, Slack, UKG, Expensify, and Confluence will remain available to ensure continuity if necessary. This does not impact intermittent leaves or flexible work schedules.

🗺️ Guidance for Exhausting Leave

When an employee exhausts their available leave—whether under FMLA, ADA accommodations, disability leave, or any other type of leave—they are generally expected to return to work on the next scheduled workday.

If an employee is unable to return to work after exhausting all applicable leave:

1. **Communicate with manager and P&C**: The employee should promptly notify either manager or P&C about their situation. P&C will evaluate whether additional accommodations or leave extensions may be available under the ADA or other policies.
2. **Reasonable Accommodation (ADA)**: If the inability to return is due to a medical condition that qualifies as a disability, P&C may explore whether a reasonable accommodation, such as extended unpaid leave, reduced hours, or modified duties, can be provided. Any extension of leave must not create an undue hardship to ActBlue.
3. **Return-to-Work Plan**: If additional leave is not granted, the employee is required to either return to their position or engage in discussions regarding their ability to fulfill job duties.
4. **Failure to Return**: If the employee does not return to work or fails to provide the necessary documentation for continued leave or accommodations, ActBlue may consider the absence

as a voluntary resignation. At this point, termination of employment may occur, following a thorough review of the situation and consistent with ActBlue policies.

Employees are encouraged to maintain open communication with P&C to avoid misunderstandings and explore all available options before leave is exhausted.

Employee Status After Leave

Depending on the type of leave, a return-to-work release may be required. P&C will inform the employee if any documentation is needed prior to their return.

Generally, employees returning from FMLA leave will be reinstated to their previous position or to a role with equivalent status, pay, benefits, and working conditions. The role will be the same or nearly identical in all essential aspects.

Additionally, disability leave for the birth of a child, an employee's serious health condition, (when applicable) will run concurrently with FMLA, provided the employee is eligible for both.

⚠ Disclaimer: Interaction With Other State and Federal Leave Programs

Time off taken under ActBlue's leave of absence policies run concurrently with other state and federal programs, including the FMLA, unless prohibited by law.

⚖ Employee Rights and Responsibilities

The P&C team strives to streamline the leave of absence process by ensuring employees understand the benefits available to them. It's also important that ActBlue provide and gather the necessary documentation needed to administer policies consistently and in compliance with applicable law.

Therefore, employees seeking to take a leave of absence must submit a leave of absence request form prior to their leave start date or as soon as possible if advance notice is not known.

📋 Required Notices

If you are located in the following states please review your **required employee notices**:

- California
- Colorado
- Connecticut
- Washington, D.C.
- Massachusetts
- New Jersey
- New York

- Oregon
- Washington

Leave of Absence FAQs

Will my healthcare or other benefits be impacted while on leave?

No. **All** employee benefits remain in effect while on an approved leave of absence.

What do managers need to do if their employee notifies them of a potential leave of absence need?

Support your staff through their leave. Engage in thoughtful leave planning to support ongoing work, realign project timelines, and if applicable, revisit goals. Respect their uninterrupted time away from work.

See below for a more comprehensive list of manager responsibilities:

- Defer to P&C; we're here to support: if you're made aware of a potential leave, even if you're not sure if the situation qualifies as an leave of absence, advise your staff to reach out to [redacted]@actblue.com
- Become familiar with these *potential* leave of absence triggers:
  - Medical, parental and family leaves longer than 5 consecutive business days
  - Personal time off exceeding 3 consecutive weeks where the reason is unclear.
    - Not every situation falling into these two categories will be an official LoA, however notification to P&C is critical to ensure everyone understands the resources and benefits available to them and that as an employer, we administer our policies consistently, equitably and in compliance with the law.
- Respect personal and protected health information. Do not ask probing questions on the reason for the leave; P&C will gather necessary info.
- Align on communication preferences during leave with the understanding that most leaves offer protections under federal and/or state law, including the right to uninterrupted, job-protected time off. Employees on leave should not be working. Align with your staff on if and to what extent they wish to be cc'd on while out, with the expectation that they are not to engage in any work until they return.
  - If you notice your direct report is working while on a leave, immediately ask them to stop and notify P&C if this continues.
- Support staff as they return from leave by aligning on schedules, setting clear expectations and remaining flexible as they adjust back to work.

Definitions

Serious health condition	means an illness, injury, impairment, or physical or mental condition that involves inpatient care or continuing treatment by a healthcare provider. This can include conditions with short-term, chronic, long-term or permanent periods of incapacity.
Spouse	means a husband or wife as defined or recognized in the state where the individual was married and includes individuals in common law or same-sex marriage. Spouse also includes a husband or wife in a marriage that was validly entered into outside of the United States, if the marriage could have been entered into in at least one state.
Domestic Partner	means an adult person whom the employee deems as their significant other and whom they share a residence with.
Child	means a biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is either under age 18, or age 18 or older and "incapable of self-care because of a mental or physical disability" at the time that FMLA leave is to commence.
Parent	means a biological, adoptive, step or foster father or mother, or any other individual who stood in loco parentis to the employee when the employee was a child. This term does not include parents "in law."
Qualifyin g exigency	includes short-notice deployment, military events and activities, child care and school activities, financial and legal arrangements, counseling, rest and recuperation, post-deployment activities, and additional activities that arise out of active duty, provided that the employer and employee agree, including agreement on timing and duration of the leave.
Covered active duty	for members of a regular component of the Armed Forces, means duty during deployment of the member with the Armed Forces to a foreign country. For a member of the Reserve components of the Armed Forces, means duty during the deployment of the member with the Armed Forces to a foreign country under a federal call or order to active duty in support of a contingency operation, in accordance with 29 CR 825.102.

The next of kin of a covered service member	is the nearest blood relative, other than the covered service member's spouse, parent or child in the following order of priority: blood relatives who have been granted legal custody of the service member by court decree or statutory provisions, brothers and sisters, grandparents, aunts and uncles, and first cousins, unless the covered service member has specifically designated in writing another blood relative as his or her nearest blood relative for purposes of military caregiver leave under the FMLA.
Covered service member	is a current member of the Armed Forces, including a member of the National Guard or Reserves, who is receiving medical treatment, recuperation or therapy, or is in outpatient status or on the temporary disability retired list for a serious injury or illness.
Serious injury or illness	is one that is incurred by a service member in the line of duty on active duty that may cause the service member to be medically unfit to perform the duties of his or her office, grade, rank or rating. A serious injury or illness also includes injuries or illnesses that existed before the service member's active duty and that were aggravated by service in the line of duty on active duty.

⚠ To the extent this space conflicts with or is inconsistent with any article of an applicable collective bargaining agreement, the terms of the collective bargaining agreement shall govern.

This guidance is currently under negotiation with CWG. If you are a member of the CWG Union, please refer to the previous version of this space here until a agreement is finalized.

EXHIBIT 25

Internal Message from ActBlue Employee to Candace King (Feb. 26, 2025, 11:46 PM)

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 1	Date Range: 2/26/2025

Outline of Conversations

[redacted] • 1 message on 2/26/2025 • Candace King • [redacted]

Messages in chronological order (times are shown in GMT +00:00)

[redacted]

[redacted]

[redacted] 2/26/2025, 11:46 PM

Candace, this whole situation is sad—avoidable and preventable, especially with so much important work to do. People are outraged about a lot of things -- the deleted Slack messages are shameful.

To clarify: Zain needed email access to complete his leave paperwork. If the new stance is that this has always been the policy, it's inconsistent. The leave program team wasn't informed his access would be revoked, and historically, this hasn't been the standard practice (we have the receipts). This puts good people in difficult positions.
Frankly, this looks like blatant retaliation, and people are noticing. Deleted messages are circulating, staff are reaching out to me for answers, and I haven't heard from you all week.

[redacted]

EXHIBIT 26

Internal Messages between ActBlue Employee and Candace King (Feb. 27, 2025)

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 27	Date Range: 2/27/2025

Outline of Conversations

[redacted] • 27 messages on 2/27/2025 • Candace King • [redacted]

Messages in chronological order (times are shown in GMT +00:00)

[redacted]

CK Candace King 2/27/2025, 12:26 AM
Hi [redacted], can you please reinstate the critical functions email, confluence, etc per the policy? I'm sorry for all of the friction this caused you today.

> CK Candace King 2/27/2025, 12:26 AM
for Zain i mean

> [redacted] [redacted] 2/27/2025, 12:28 AM
Hey, sorry for you too - I've never seen anything like this

> [redacted] [redacted] 2/27/2025, 12:28 AM
email, confluence, slack and ukg?

> CK Candace King 2/27/2025, 12:28 AM
yes please.

> [redacted] [redacted] 2/27/2025, 12:28 AM
ok on it

[redacted]

> CK Candace King 2/27/2025, 12:34 AM
let me get through Zain first. i'll reply to him once he's reinstated.

> [redacted] [redacted] 2/27/2025, 12:36 AM
I am worried about how he'll behave with these accounts when he gets back in, honestly

> CK Candace King 2/27/2025, 12:36 AM
i still want access to his emails though. is that possible?

> [redacted] [redacted] 2/27/2025, 12:36 AM
Only if you have delegate email access and he'd see that

> CK **Candace King** 2/27/2025, 12:36 AM
i am too so we need to monitor it and if there is a conduct concern, we will address it

> [redacted] [redacted] 2/27/2025, 12:38 AM
We have sec tooling that can monitor behavior

> [redacted] [redacted] 2/27/2025, 12:38 AM
mass download, messages meant to harass, etc

> CK **Candace King** 2/27/2025, 12:38 AM
ok great! then can we key in on him there?

> [redacted] [redacted] 2/27/2025, 12:38 AM
yup

> [redacted] [redacted] 2/27/2025, 12:46 AM
His access is all set - I reset his password so he'll need help getting back in. I'm going to reach out to his personal email and see if he needs help

> [redacted] [redacted] 2/27/2025, 12:46 AM
Unless you want to follow up? Up to you

> CK **Candace King** 2/27/2025, 12:49 AM
you can reach out. i need to respond to an email he sent regarding this matter but I'll also share that you're reaching out to assist via his personal email.

> [redacted] [redacted] 2/27/2025, 12:50 AM
ok - thanks

> CK **Candace King** 2/27/2025, 1:00 AM
done!

> CK **Candace King** 2/27/2025, 1:53 AM
sorry to bother again [redacted] were you able to reach Zain to assist with his password reset?

> CK **Candace King** 2/27/2025, 1:53 AM
checking on you to see if it went ok for you

> [redacted] [redacted] 2/27/2025, 2:09 AM
He didn't respond to me

> CK **Candace King** 2/27/2025, 2:11 AM
ok. again, i'm sorry [redacted] for today, period.

[redacted]