

United States Senate
WASHINGTON, DC 20510-0908

COMMITTEES:
APPROPRIATIONS
FOREIGN RELATIONS
SELECT COMMITTEE ON INTELLIGENCE
SMALL BUSINESS AND ENTREPRENEURSHIP
SPECIAL COMMITTEE ON AGING

April 11, 2023

Dara Lindenbaum
Chairwoman
Federal Election Commission
1050 First Street NE
Washington, D.C. 20463

Sean Cooksey
Vice Chairman
Federal Election Commission
1050 First Street NE
Washington, D.C. 20510

Dear Chairwoman Lindenbaum and Vice Chairman Cooksey:

I write to urge the Federal Election Commission (FEC) to investigate the purported presence of widespread fraudulent donations being reported to the commission by ActBlue, a Democratic campaign conglomerate.

Recently, alarming reports emerged of fraudulent donations being reported to the FEC by ActBlue. These reports indicate that numerous individuals, including senior citizens, have purportedly donated to ActBlue thousands of times a year. However, according to recent investigative reports, many of these individuals had no idea that their names and addresses were being used to give thousands of dollars in political donations, with most of these “donations” going to ActBlue. It should come as no surprise that ActBlue serves as a vessel for fraud, considering the intentional lack of security engrained within their donation processes and systems.

As you both know, the vast majority of online transactions require a card verification value (CVV) number. This requirement is standard practice across the e-commerce industry to reduce fraud and prevent unlawful foreign transactions. In knowing that foreign actors use fake accounts to exploit donation systems that do not have robust verification processes and systems in place, most individual campaigns and political action committees (PACs) require CVV numbers as part of making an online donation. However, in breaking with most organizations, ActBlue does not require CVV numbers as a requirement for donating, and thus lending itself as a facilitator of fraud.

I urge the commission to investigate ActBlue’s reporting and insufficient security guardrails. Additionally, I request answers to the following questions:

1. Is the commission concerned about reports detailing widespread fraud from ActBlue?
2. Was the commission aware of these seemingly fraudulent donations being reported by ActBlue prior to reports surfacing?
3. Will the commission investigate ActBlue and their reporting?
 - a. If no, please provide a detailed explanation.

4. What safety/security guardrails does the commission mandate that political organizations and campaigns use as a function of accepting online donations?
5. Does the commission agree that all organizations overseen by the commission should have sufficient guardrails to protect consumers and the donations they place, including the requirement of CVV numbers when making a donation to a political organization, candidate, and/or campaign?

Thank you for your attention to this important matter. I look forward to your prompt response.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Rubio', with a stylized flourish at the end.

Marco Rubio
U.S. Senator