



ALAN WILSON
ATTORNEY GENERAL

August 22, 2024

**ActBlue
Regina Wallace Jones, CEO
366 Summer Street, Somerville, MA 02144**

Dear Ms. Regina Wallace Jones:

My office has been alerted to multiple grave allegations across the country that ActBlue, ActBlue Civics, Inc., and ActBlue Charities, Inc. (collectively referred to as “ActBlue”) may have engaged in potentially fraudulent, deceptive, or otherwise illegal activities. These allegations are of utmost concern and require immediate attention and action.

It has come to my attention that these alleged activities may include “smurfing,” a money laundering technique where large sums of money are “donated” to a political candidate (or committee), and are broken down through smaller, less conspicuous amounts. Based on publicly accessible information, some individual donors in South Carolina have purportedly donated funds through ActBlue in prolific volumes that appear implausible and highly suspicious. Alarming, some of these individuals list their occupations as “unemployed” or report jobs that could not be reasonably commensurate to the total amount of financial contributions made by others in similar positions. These circumstances raise the question of whether contributions via ActBlue may be originating from straw-donors or fictitious accounts, indicating potentially fraudulent activity. The allegations also raise the question of whether contributions were made without the reported donors’ consent or awareness, which is equally troubling.

Allegations such as these, if true, could constitute violations of multiple provisions of South Carolina charitable, regulatory, and criminal law. These allegations, if true, also could potentially violate South Carolina’s campaign finance laws if contributions to ActBlue were then directed to candidates seeking state or local public office in South Carolina. Additionally, these allegations, if true, could potentially violate multiple provisions of the Federal Election Campaign Act if contributions to federal candidates and committees were made in the name of another.

South Carolinians are entitled to transparency and the assurance that nonprofit and political entities are financed legally. Any deviation from this transparency undermines the integrity of our elections and political processes. And as the chief legal officer in South Carolina, it is my duty to ensure unequivocal compliance with the law.

Therefore, it is imperative that you provide my office with a detailed description of ActBlue's processes and procedures for verifying the legitimacy and accuracy of donor and contribution information, as well as the information reported to South Carolina's regulatory bodies. Organizations such as yours have every right to raise campaign funds for its preferred candidates. However, those organizations must remain as transparent as possible so that the public can be reassured of the integrity of our electoral process.

Therefore, given the seriousness of these allegations, I am requesting that you provide a response by **Friday, September 6, 2024**. If you have any questions, please contact Chief Deputy Attorney General Jeff Young at jyoung@scag.gov.

Respectfully,

Alan Wilson
Attorney General of South Carolina