

**To:** ActBlue CEO and President Regina Wallace-Jones, ActBlue Chief Revenue Officer Peter Slutsky, ActBlue Director for Democratic Politics & Elections Kiersten Armoni, ActBlue Assistant Director for PACs Emily Zahn, ActBlue Communications Director Megan Hughes

**Re:** ActBlue's responsibility to protect donors

**Date:** December 18, 2024

Grassroots donations play a vital role in funding the work done by progressive organizations, Democratic political campaigns and political committees.

But for many years now, campaign operatives and practitioners have engaged in a lively debate about the sustainability and ethics of some of the fundraising tactics employed by some campaigns and committees. Many of us have argued that these tactics are exploiting donors, harming the Democratic Party's brand, and causing damage to the progressive fundraising ecosystem.

At the same time, the results of several races this cycle and in previous cycles make clear that raising a massive sum of money online doesn't guarantee victory, calling into question the wisdom of campaign tactics that prioritize fundraising totals over all other considerations.

This debate hasn't been confined to digital operatives and campaign staff. Democrats' questionable fundraising tactics have garnered [widespread press attention](#), prompted inquiries from multiple [state attorneys general](#), attracted scrutiny from the [Department of Justice](#) and [Federal Election Commission](#), and inspired [state](#) and [federal legislation](#). Democrats' spammy and deceptive fundraising tactics have even found their way into pop culture, where late night hosts like [Stephen Colbert](#) and comedians like [Colin Jost](#) have made them the punchline of jokes.

Over the summer, the debate over Democrats' digital fundraising tactics reignited by a [series of articles](#) published by Sam Stein in The Bulwark. The articles detail scammy emails and text messages directing people to donate to various Political Action Committees via ActBlue.

In response to Stein's reporting, ActBlue released a statement affirming that it has "a responsibility to ensure the entities on our platform are using our technology appropriately" and is "committed to building a sustainable grassroots movement."

Later, on [The Great Battlefield Podcast](#), ActBlue CEO and President Regina Wallace-Jones reiterated ActBlue's intention to do more to protect donors from bad actors and unscrupulous tactics. "There are actions that we can and must continue to take to tamp this down," she said. "This is a frontier of innovation that we're committed to."

We strongly agree with these sentiments and greatly appreciate ActBlue's commitment to doing more than it has in the past to protect donors on its platform from being exploited.

We also appreciate the steps ActBlue has taken in the past to rein in some of the most egregious practices, including modifying the policy on pre-checked recurring donations, providing new guidance to Political Action Committees on your Account Use Policy, and strengthening your Terms of Service in August 2024.

Given ActBlue's pivotal role in Democratic and progressive fundraising, it has a special responsibility to play a leadership role in protecting donors from deceptive practices. And while ActBlue has taken some helpful steps in that direction, we believe it can and must do more.

To that end, a group of experienced digital fundraisers, organizers and campaign professionals developed a list of recommendations and ideas for your consideration. These ideas are intended to be a starting point for a discussion, not a prescription or set of demands. The recommendations can be found in Appendix A below, followed by a few examples of the types of messages we're referring to in Appendix B.

While the undersigned don't all agree with every idea and recommendation listed below, we all believe that ActBlue should be doing more to protect donors and foster a healthy fundraising ecosystem that ensures donors and supporters feel respected and safe when choosing to give their money to Democratic candidates and causes.

We look forward to collaborating on these ideas to ensure Democratic donors are better protected. We would welcome the opportunity to discuss what we can do to help you tackle these challenges in 2025 and beyond.

Sincerely,

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Renaiss Winter, Neighbors for Progressive Action  
Robert Wheeler  
Roberta Baskin, Partners4Democracy  
Roberta C Brooks  
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## Appendix A: Recommendations

### Strengthen terms of service and account use policy by adding specificity and closing loopholes

- Prohibit post-petition and post-survey redirects to ActBlue pages that include language falsely claiming the individual promised to donate
- Prohibit misleading tandem donation appeals that don't specify in the email, text or ad which entities are receiving part of the split or how the split will be allocated
- Prohibit phony countdown clocks
- Prohibit all administrators from selling or swapping contact information acquired through ActBlue donation forms
- Initiate enforcement action against agencies and their leadership for repeated violations, limiting or removing their ability to administer ActBlue accounts
- Close the loophole Political Action Committees are using to get around your July 31 guidance by sending emails and texts without their full name that link to a petition redirecting to an ActBlue page
- Set a maximum threshold for the percentage of total expenditures entities using ActBlue for donation processing can spend with companies they own or control
- Prohibit tactics identified by the American Association of Political Consultants as [“examples of bad practices”](#), including:
  - Using language like “final notice” to deceive donors that the solicitation is a bill
  - Using misleading sender information to suggest the solicitation came from a government entity, official or signer that you are not a representative of
  - Using matching language when the donation is not matched

### Invest in new features to protect donors

- Offer an optional email forwarding service so that when donors provide an email like alicesmith@gmail.com, it gets sent to the campaign or committee as [alicesmith+jonesformayor@donors.actblue.com](mailto:alicesmith+jonesformayor@donors.actblue.com)
- Let users opt-out of sharing contact information not required by the FEC with entities they're donating to
- Modify the default tandem fundraising opt-in experience so donors aren't signing up for 10+ email lists with a single donation
- Include a small number of fake donor records in CSV exports to catch folks selling or swapping donor contact info acquired through ActBlue donation forms
- Require every organization registering to receive ActBlue contributions to list a public website and prominently link to it on every ActBlue donation page
- Require all donation pages to include an opt-in disclaimer
- Require any page that solicits donations for a political organization/pac/llc/etc that is not an official Democratic Party committee or apparatus (DNC, DSCC, DCCC, DGA, DLCC, state parties) to have an automatic disclaimer that says: "[Organization Name] is a [type of org] and is not an official organization of the Democratic Party."

- Require any page that doesn't directly donate to a candidate to say something along the lines of: "Your donation will not directly benefit any political candidate"
- Build an FEC or Open Secrets integration that dynamically pulls in or at least links to data on a committee's expenditures. Ideally this integration would allow prospective donors to see who runs the organization, the type of organization, date registered with ActBlue, website, total contributions, candidate recipients, expenditures by category, and top vendors/recipients

### **Provide transparency and a voice to the digital fundraising ecosystem**

- Regularly survey donors to better understand their experiences with ActBlue
- Provide a dedicated email address and cell phone number to make it easy to report violations
- Create a mechanism for anonymously reporting potential violations
- Regularly produce public reports outlining enforcement actions, including the number and nature of violations acted upon since the last report
- Regularly solicit industry stakeholder input on new threats to donors using ActBlue and what ActBlue can do to neutralize those threats
- Hire more support staff to ensure that abuse reports are addressed within two business days (when you report something now you get this: "We do our best to prioritize event and refund inquiries; however, due to an unusually high volume of requests, other inquiries will be handled within 10-14 business days.")
- Create an integrity unit inside ActBlue that is responsible for investigating complaints and ensuring that entities with ActBlue accounts are following the Account Use Policy and Terms of Service

## Appendix B: Sample Text Messages

Barack Obama just broke his silence. It's THAT important >>  
<https://secure.actblue.com/donate/dempower24?refcode=0214c1&refcodeSTW=2JPLms>

Dem Power  
Stop to End

