

April 24, 2025

MEMORANDUM FOR THE SECRETARY OF THE TREASURY
THE ATTORNEY GENERAL
THE COUNSEL TO THE PRESIDENT

SUBJECT: Investigation into Unlawful "Straw Donor" and
Foreign Contributions in American Elections

Federal law (52 U.S.C. 30121 and 30122) strictly prohibits making political contributions in the name of another person, as well as contributions by foreign nationals.

Notwithstanding these laws designed to protect American democracy, press reports and investigations by congressional committees have generated extremely troubling evidence that online fundraising platforms have been willing participants in schemes to launder excessive and prohibited contributions to political candidates and committees.

Specifically, these reports raise concerns that malign actors are seeking to evade Federal source and amount limitations on political contributions by breaking down large contributions from one source into many smaller contributions, nominally attributed to numerous other individuals, potentially without the consent or even knowledge of the putative contributors. The reports also raise concerns that such "straw donations" are being made through "dummy" accounts, potentially using gift cards or prepaid credit cards to evade detection.

Further, there is evidence to suggest that foreign nationals are seeking to misuse online fundraising platforms to improperly influence American elections. A recent House of Representatives investigation revealed that a platform named ActBlue had in recent years detected at least 22 "significant fraud campaigns", nearly half of which had a foreign nexus. During a 30-day window during the 2024 campaign, the platform detected 237 donations from foreign IP addresses using prepaid cards, indicating that this activity remains a pressing concern.

These activities undermine the integrity of our electoral process. Therefore, I direct the Attorney General, in consultation with the Secretary of the Treasury, to use all lawful authority, as necessary, to investigate allegations regarding the unlawful use of online fundraising platforms to make "straw" or "dummy" contributions or foreign contributions to political candidates and committees, and to take all appropriate actions to enforce the law.

I further direct the Attorney General to report back to me through the Counsel to the President within 180 days of the date of this memorandum on the results of the investigation.

This memorandum is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

DONALD J. TRUMP