

OPEN-SOURCE INTELLIGENCE INVESTIGATION

Age Verification Lobbying: Dark Money, Model Legislation & Institutional Capture

How corporate lobbying, think tank infrastructure, competing model legislation, and obscured funding networks are shaping age verification policy across 45 states and Congress.

\$26.3M

FEDERAL LOBBYING (2025)

86+

LOBBYISTS, 45 STATES + EU

\$70M+

SUPER PAC SPENDING

283

DOCUMENTED FINDINGS

EXECUTIVE SUMMARY

What This Investigation Found

This investigation documents a national lobbying operation spanning corporate spending, think tank infrastructure, dark money networks, and competing model legislation templates. Meta spent a record \$26.3 million on federal lobbying in 2025, deployed 86+ lobbyists across 45 states, and covertly funded a group called the **Digital Childhood Alliance (DCA)** to advocate for the **App Store Accountability Act (ASAA)**. But the operation extends beyond Meta.

The Heritage Foundation funds three of six named DCA coalition organizations, staffs the advocacy pipeline from Capitol Hill to state legislatures, and has merged leadership with another coalition member. A competing model bill (ICMEC’s DAAA) takes a different approach, creating a two-track legislative landscape where both tracks shift regulatory burden away from social media platforms. Snap, X, and Pinterest have joined Meta in supporting ASAA. Every confirmed supporter is a social media platform; every opponent operates an app store.

This investigation traced funding flows across five confirmed channels, analyzed **\$2.0 billion in dark money grants**, searched 59,736 DAF recipients, parsed LD-2 filings, and mapped campaign contributions across four states to document the operation.

The pattern extends internationally. Meta spends EUR 10 million annually on EU lobbying (the largest single company spend), retains 18+ consulting firms across jurisdictions, and uses at least three firms operating in both Brussels and Washington. In Brazil, Meta appeared at legislative hearings for PL 2628/2022, though Brazil’s resulting law placed the burden on platforms directly. ICMEC, which authored the competing DAAA model legislation aligned with Meta’s interests, operates under severe financial distress with Meta as a confirmed major donor. Over 30 jurisdictions introduced age verification bills within an 18-month window.

Every finding is sourced from public records: IRS 990 filings, Senate LD-2 lobbying disclosures, state and EU lobbying registrations, campaign finance databases, corporate registries, WHOIS/DNS records, charity filings, and investigative journalism.

INVESTIGATION TRACKS

Nine Documented Tracks

Each track documents a distinct pathway through which age verification legislation is advanced, funded, or staffed.

Direct Lobbying

DCA (Astroturf)

Super PACs

Arabella Network

State Campaigns

Heritage Foundation •

ICMEC & Model Legislation •

International •

Funding Networks •

\$26.3 Million, 86+ Lobbyists, 45 States

Meta retained 40+ lobbying firms and 87 federal lobbyists in 2025 (85% with prior government service). Meta’s own LD-2 filings with the Senate explicitly list H.R. 3149/S. 1586, the App Store Accountability Act, as a lobbied bill.

At the state level, confirmed operations include **\$338,500 to Headwaters Strategies** (Colorado), **\$324,992+ across 9 firms and 12 lobbyists** in Louisiana, and **\$1,036,728 in direct California lobbying** (Q1-Q3 2025 alone).

A Meta lobbyist brought the legislative language for **Louisiana HB-570** directly to the bill’s sponsor, Rep. Kim Carver, who confirmed this publicly.

INFLUENCE MAP

The Lobbying Network

EXPLORE

Deep Dive

DATABASE

283 Documented Findings

All documented findings with source citations, filterable by category. 184 high confidence, 93 medium, 6 low.

CHRONOLOGY

Investigation Timeline

Key events from DCA domain registration through state law signings.

ANALYSIS

Research Documents

29 analysis files covering IRS filings, lobbying disclosures, campaign finance, and more.

PROCESS

Methodology

OSINT techniques, source categories, and verification approach.

MEDIA

Press Contact

Key findings summary for journalists, downloadable charts.

SOURCE

Source Repository

Full source data, 29 analysis files, and interactive HTML reports. Also mirrored on [Forgejo](#).

