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COMMITTEE ON THE JUDICIARY,
JOINT WITH THE
COMMITTEE ON HOUSE ADMINISTRATION
AND THE
COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

DEPOSITION OF: AARON TING

Monday, November 17, 2025

Washington, D.C.

The deposition in the above matter was held in room 2237, Rayburn House Office Building, commencing at 9:59 a.m.

Present: Representatives Bice and Crockett.

1 Appearances:

2

3 For the COMMITTEE ON THE JUDICIARY:

4

5 [REDACTED], DEPUTY DIGITAL DIRECTOR

6 [REDACTED], DEPUTY GENERAL COUNSEL

7 [REDACTED], PROFESSIONAL STAFF MEMBER

8 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

9 [REDACTED], RESEARCH ASSISTANT

10 [REDACTED], MINORITY SPECIAL COUNSEL

11 FOR INVESTIGATIONS AND SENIOR ADVISOR

12 [REDACTED], MINORITY FELLOW

13 [REDACTED], MINORITY LEGAL INTERN

14 [REDACTED], MINORITY INTERN

15 [REDACTED], MINORITY SENIOR COUNSEL

16

17

18 For the COMMITTEE ON HOUSE ADMINISTRATION:

19

20 [REDACTED], DEPUTY GENERAL COUNSEL

21 [REDACTED], COUNSEL

22 [REDACTED], MINORITY COUNSEL

23

24

25

1 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

2

3 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

4 [REDACTED], GENERAL COUNSEL

5 [REDACTED], SENIOR ADVISOR TO CHAIRMAN COMER

6 [REDACTED], SENIOR COUNSEL

7 [REDACTED], COUNSEL

8 [REDACTED], MINORITY DEPUTY CHIEF COUNSEL

9

10 For The WITNESS:

11

12 DANNY C. ONORATO

13 TARA N. TIGHE

14 Schertler, Onorato, Mead & Sears, LLP

15 555 13th Street NW, Suite 500 West

16 Washington, D.C. 20004

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1 [REDACTED]: Good morning. This is a deposition of Mr. Aaron Ting, Former
2 Director and Associate General Counsel of Product and Privacy at ActBlue.

3 The Committee on House Administration, the Committee on the Judiciary, and the
4 Committee on Oversight and Government Reform are charged with upholding fundamental
5 American civil liberties and protecting the integrity of American elections.

6 In light of allegations that online fundraising platforms that serve as conduits for
7 political donations have accepted fraudulent donations from domestic and foreign sources,
8 the committees are conducting oversight to inform potential legislative reforms.

9 To further the committee's oversight and legislative reforms, the chairmen have
10 requested a deposition with Mr. Ting.

11 On September 4th, 2025, the committees issued subpoenas for Mr. Ting to appear at
12 a deposition on October 21st. After conferring with counsel, the committees agreed to
13 move the deposition to today, November 17th.

14 I have marked the September 4th, 2025, subpoena as Exhibit No. 1, on
15 November 10th. The Committee Notice of today's deposition. I have marked the
16 November 10th notice as Exhibit No. 2.

17 [Ting Exhibits Nos. 1 and 2
18 were marked for identification.]

19 [REDACTED]: Would the witness please state your name for the record.

20 The Witness. Aaron Ting.

21 [REDACTED]: Could counsel, please, state your name for the record?

22 Mr. Onorato. Danny Onorato.

23 Ms. Tighe. Good morning. Tara Tighe.

24 [REDACTED]: My name is [REDACTED], and I'm with Chairman Jordan's staff. I'll
25 now have everyone else from the committees, including members who are here in the

1 room, introduce themselves as well.

2 [REDACTED]: [REDACTED] on Chairman Jordan's staff.

3 Mrs. Bice. Congresswoman Stephanie Bice, House Administration.

4 [REDACTED]: [REDACTED], Deputy Chief Counsel Minority. House Oversight
5 Minority.

6 [REDACTED]: [REDACTED] with Ranking Member Raskin's staff.

7 [REDACTED]: [REDACTED] with Ranking Member Morelle's staff.

8 [REDACTED]: [REDACTED], Ranking Member Raskin's staff.

9 [REDACTED]: [REDACTED], Ranking Member Raskin's staff.

10 [REDACTED]: [REDACTED], Ranking Member Raskin's staff.

11 [REDACTED]: [REDACTED], Chairman Bryan Steil's staff with House Admin majority.

12 [REDACTED]: [REDACTED], House Admin majority.

13 [REDACTED]: [REDACTED], Chairman Jordan's staff.

14 [REDACTED]: [REDACTED], Chairman Jordan's staff.

15 [REDACTED]: [REDACTED], Chairman Jordan's staff.

16 [REDACTED]: [REDACTED], Chairman Jordan's staff.

17 [REDACTED]: [REDACTED], Chairman Jordan's staff.

18 [REDACTED]: [REDACTED], Chairman Jordan's staff.

19 [REDACTED]: [REDACTED], Chairman Jordan's staff.

20 [REDACTED]: Thank you. I'll now review the ground rules and guidelines that we
21 will follow during today's deposition. The committees will conduct today's deposition in
22 accordance with the House's regulation for the use of deposition authority.

23 Our questioning will proceed in rounds. The majority will ask questions first for one
24 hour, and then the minority will have an opportunity to ask questions for an equal period of
25 time, if they choose.

1 There will be two staff counsel per side asking the questions. To the extent the
2 members have questions for the witness, they will be propounded during their side's
3 respective round. The clock will stop if the witness needs to confer with counsel, when
4 counsel for the witness is speaking, and when members are speaking during the opposite
5 side's round. We'll alternate back and forth until there are no more questions and the
6 deposition is over.

7 We ordinarily take a break at the end of each hour, but if you would like to take a
8 break apart from that, please just let us know.

9 As you can see, there is an official court reporter taking down everything we say to
10 make a written record. So we ask that you give verbal responses to all questions. Do you
11 understand?

12 The Witness. Yes.

13 [REDACTED]. So the court reporter can take down a clear record, please try and
14 speak clearly so the court reporter can understand, and so the people at the end of the table
15 can hear you. It is important that we do not talk over one another or interrupt each other,
16 if we can help it, and that goes for everybody present at today's deposition.

17 We want you to answer our questions in a complete and truthful manner. If you do
18 not understand one of our questions or need clarification about what we are seeking, please
19 let us know. If you do not know the answer to a question or do not remember, please tell
20 us what you do know and remember. It is okay to tell us if you learn information from
21 someone else, just indicate how you came to know the information. If there are things you
22 do not know and cannot remember, just say so and please inform us who, to the best of
23 your knowledge, might be able to provide a more complete answer to the question.

24 By law, you are required to answer questions from Congress truthfully. Do you
25 understand that?

1 The Witness. Yes.

2 [REDACTED]: This also applies to questions posed by congressional staff in a
3 deposition. Do you understand this?

4 The Witness. Yes.

5 [REDACTED]: Witnesses that knowingly provide false testimony could be subject to
6 criminal prosecution for perjury. This includes, for example, stating that you do not recall
7 or remember something, when in fact you do. Do you understand this?

8 The Witness. Yes.

9 [REDACTED]: Furthermore, you cannot tell half-truths or exclude information
10 necessary to make statements accurate. You are required to provide all information that
11 would make your response truthful. A deliberate failure to disclose information can
12 constitute a false statement. Do you understand this?

13 The Witness. Yes.

14 [REDACTED]: Is there any reason you are unable to provide truthful answers to
15 today's questions?

16 The Witness. On the advice of counsel, I must respectfully decline to answer based
17 upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to
18 the Constitution. I must follow my lawyer's advice in this matter.

19 [REDACTED]: The Federal Rules of Evidence, Criminal, and Civil Procedure are not
20 applicable for today's deposition. Under the House Deposition Regulation, a witness'
21 attorney may not instruct a witness to refuse to answer a question, except to preserve
22 privilege.

23 The House recognizes constitutionally-based privileges, and not necessarily those
24 privileges derived from common law.

25 Finally, I will make note that the members and staff here today, that the content of

1 what we discuss here today is confidential under the House Deposition Regulations. Under
2 the rule, the chairman and ranking minority members shall consult before any release of
3 testimony, transcripts, including portions thereof. This means it is a violation of House and
4 committee rules to disclose content of the deposition prior to its official release.

5 For this reason, the marked exhibits that we will use today will remain with the court
6 reporter so that they can go in the official transcript, and any copies of those exhibits will be
7 returned to us when we wrap up.

8 Before we begin the first round of questions, we will afford the minority, the witness,
9 and counsel for the witness the opportunity to offer any preliminary remarks.

10 [REDACTED]. I just want to say thank you for being here today. We appreciate it.
11 And I would like to note that this is being recorded.

12 [REDACTED]. Mr. Onorato.

13 Mr. Onorato. Thank you. Good morning. My name is Danny Onorato. My
14 colleague, Tara Tighe, and I represent Aaron Ting, a former attorney for ActBlue.

15 When the committees first contacted us back in May of 2025, we promptly
16 requested that the committees confer with ActBlue to address two critical matters: First,
17 whether ActBlue would authorize a waiver of the attorney-client privilege; and second, the
18 scope of any potential testimony by our prospective clients.

19 The committees have not engaged with ActBlue on these issues, and this failure has
20 created the situation we face today.

21 Mr. Ting is a licensed attorney, and so being licensed, he's bound by the Rules of
22 Professional Responsibility and Ethics, and they impose mandatory duties to preserve
23 attorney-client privilege and protect client confidences. These obligations don't cease
24 when an attorney leaves employment; they continue indefinitely. Legal precedent and
25 ethics rules are abundantly clear, absent a waiver of the attorney-client privilege, an

1 attorney must take all steps necessary to protect client confidences when responding to
2 questions from Congress.

3 If an attorney fails to assert privilege, he or she may inadvertently waive privilege
4 over information provided, a waiver that can't be undone. Moreover, an attorney who
5 discloses privileged information without client authorization faces severe professional
6 consequences, including potential disbarment, or suspension.

7 Mr. Ting cannot and will not jeopardize his law license by breaching his ethical
8 obligations. Given the committee's failure to work with ActBlue to obtain appropriate
9 waivers or define the scope of permissible testimony, Mr. Ting has no alternative. He must
10 protect all privileged information.

11 Thus, following the advice of counsel, Mr. Ting will assert the attorney-client
12 privilege, as well as his Fifth Amendment privilege. We want to emphasize unequivocally
13 that asserting the Fifth Amendment does not imply any wrongdoing to the contrary.

14 As the Supreme Court has recognized more than a century ago, the Fifth
15 Amendment is, quote, "a protection to the innocent," and quote, "a safeguard against
16 needless, unfounded, or tyrannical prosecutions." That's *Queen v. United States*, 349
17 U.S. 155, 1955.

18 Simply put, Mr. Ting's assertion of privilege are mandated by these circumstances.
19 Thank you.

20 [REDACTED]. Thank you. The court reporter will now swear the witness in.

21 The Reporter. Yes, ma'am. Sir, will you raise your right hand.

22 Do you solemnly declare and affirm, under the penalty of perjury, that the testimony
23 you will give today will be the truth, the whole truth, and nothing but the truth?

24 The Witness. I do.

25 The Reporter. Thank you.

1 [REDACTED]. The clock now reads 10:08 a.m. we'll start the first round of
2 questions.

3 EXAMINATION

4 BY [REDACTED]:

5 Q Mr. Ting, when did you work at ActBlue?

6 A On the advice of counsel, I must respectfully decline to answer based upon the
7 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
8 Constitution. I must follow my lawyer's advice in this matter.

9 Q Thank you. And we'll ask that you state the privileges with specificity. So do
10 both apply to this question?

11 Mr. Onorato. They'll apply to every question.

12 BY [REDACTED]:

13 Q Thank you. What did you do at ActBlue?

14 A On the advice of counsel, I must respectfully decline to answer based upon the
15 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
16 Constitution. I must follow my lawyer's advice in this matter.

17 Q Did your job responsibilities include providing legal oversight for decisions
18 about fraud?

19 A On the advice of counsel, I must respectfully decline to answer based upon the
20 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
21 Constitution. I must follow my lawyer's advice in this matter.

22 Q Did members of ActBlue's legal and compliance teams leave ActBlue after the
23 2024 election because of the platform's inability to prevent fraud?

24 A On the advice of counsel, I must respectfully decline to answer based upon the
25 attorney-client privilege and in reliance on my right under the Fifth Amendment to the

1 Constitution. I must follow my lawyer's advice in this matter.

2 Q Why did you abruptly depart from ActBlue?

3 A On the advice of counsel, I must respectfully decline to answer based on the
4 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
5 Constitution. I must follow my lawyer's advice in this matter.

6 Q Was Zain Ahmad placed on leave and retaliated against for blowing the whistle
7 on pervasive fraud at ActBlue?

8 A On the advice of counsel, I must respectfully decline to answer based upon the
9 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
10 Constitution. I must follow my lawyer's advice in this matter.

11 Q After the entire legal team departed from ActBlue and no longer worked there,
12 was ActBlue able to carry out its legal obligations and deter bad actors?

13 A On the advice of counsel, I must respectfully decline to answer based upon the
14 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
15 Constitution. I must follow my lawyer's advice in this matter.

16 Q Why is ActBlue so bad at stopping fraudulent donations?

17 A On the advice of counsel, I must respectfully decline to answer based upon the
18 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
19 Constitution. I must follow my lawyer's advice in this matter.

20 Q Were you ever instructed, and/or did you ever instruct anyone at ActBlue to
21 turn a blind eye to fraud so that campaigns could increase its funding on the platform?

22 A On the advice of counsel, I must respectfully decline to answer based upon the
23 attorney-client privilege, and in reliance on my right under the Fifth Amendment to the
24 Constitution, I must follow my lawyer's advice in this matter.

25 Q According to internal ActBlue documents, in 2024, due to a policy change,

1 ActBlue took a more lenient approach to fraud. Why did ActBlue take a more lenient
2 approach to fraud in 2024?

3 A On the advice of counsel, I must respectfully decline to answer based on the
4 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
5 Constitution. I must follow my lawyer's advice in this matter.

6 Q Did ActBlue make a concerted effort to allow more fraud on the platform in
7 2024?

8 A On the advice of counsel, I must respectfully decline to answer based upon the
9 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
10 Constitution. I must follow my lawyer's advice in this matter.

11 Q Did ActBlue ban CVV's gift card donations, prepaid donations, and foreign
12 donations because it was worried about legal scrutiny of fraud committed using these
13 mechanisms?

14 A On the advice of counsel, I must respectfully decline to answer based upon the
15 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
16 Constitution. I must follow my lawyer's advice in this matter.

17 Q While you were at ActBlue, were there ever fraud campaigns conducted that
18 used gift cards or prepaid cards?

19 A On the advice of counsel, I must respectfully decline to answer based on the
20 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
21 Constitution. I must follow my lawyer's advice in this matter.

22 Q Why did ActBlue exempt recurring donations from the CVV requirement?

23 A On the advice of counsel, I must respectfully decline to answer based upon the
24 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
25 Constitution. I must follow my lawyer's advice in this matter.

1 Q Do you have any knowledge about the training that ActBlue uses for new
2 employees on fraudulent donations?

3 A On the advice of counsel, I must respectfully decline to answer based upon the
4 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
5 Constitution. I must follow my lawyer's advice in this matter.

6 Q Does ActBlue test potential fraud prevention policy changes for their effect on
7 donations before implementing them?

8 A On the advice of counsel, I must respectfully decline to answer based upon the
9 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
10 Constitution. I must follow my lawyer's advice in this matter.

11 Q As a follow-up to that question, how often were policy changes not
12 implemented because of these tests?

13 A On the advice of counsel, I must respectfully decline to answer based upon the
14 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
15 Constitution. I must follow my lawyer's advice in this matter.

16 Q How many times have campaigns used entering mode to directly input
17 fraudulent donations to the campaigns directly?

18 A On the advice of counsel, I must respectfully decline to answer based upon the
19 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
20 Constitution. I must follow my lawyer's advice in this matter.

21 Q How many times were there coordinated big fraud attacks where each
22 individual donation fell below the Sift threshold?

23 A On the advice of counsel, I must respectfully decline to answer based upon the
24 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
25 Constitution. I must follow my lawyer's advice in this matter.

1 Q Is the practice of smurfing in which bad actors make fraudulent donations using
2 the personal information of real people prevalent at ActBlue?

3 A On the advice of counsel, I must respectfully decline to answer based upon the
4 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
5 Constitution. I must follow my lawyer's advice in this matter.

6 Q Does ActBlue cooperate with internal bank investigations on potentially
7 fraudulent transactions?

8 A On the advice of counsel, I must respectfully decline to answer based upon the
9 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
10 Constitution. I must follow my lawyer's advice in this matter.

11 Q Does ActBlue take advantage of older voters to con them into making larger
12 recurring donations?

13 A On the advice of counsel, I must respectfully decline to answer based upon the
14 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
15 Constitution. I must follow my lawyer's advice in this matter.

16 Q Any questions? We can go off the record.

17 [Discussion off the record.]

18 BY [REDACTED]:

19 Q We'll go back on the record at 10:17 a.m.

20 All right. Good morning. I'm [REDACTED]. I'm with the House Judiciary
21 Ranking Member Raskin's staff. Just like the majority had a chance to ask you a few
22 questions, we'll now have an opportunity to ask you questions.

23 During the break, we did hand out a few exhibits, seven to be specific, and I will go
24 through those individually right now.

25 Exhibit 3 is an April 24th, 2025, executive order from President Donald Trump, titled:

1 Investigation into Unlawful Straw Donor and Foreign Contributions to American Elections.

2 Exhibit 4 is a May 7th, 2025, letter to the Honorable Pamela J. Bondi. It relates to
3 ActBlue, and it is signed by the chairmen of the three committees -- Committee on House
4 Administration, Committee on the Judiciary, and Committee on Oversight and Government
5 Reform.

6 Exhibit 5 is a May 14th, 2025, letter to the Honorable Scott Bessent. It relates to
7 WinRed and other political action committees. It is signed by the ranking members of the
8 Committee on Oversight and Government Reform, the Committee on House Administration,
9 the Committee on the Judiciary.

10 Exhibit 6 is a July 31st, 2024, Al Jazeera article titled: Republican PAC WinRed
11 misleads U.S. Consumers into Recurring Donations.

12 Exhibit 7 is an October 21st, 2025, New York Times article, titled: Trump said to
13 Demand Justice Department Pay Him \$230 million for Past Cases.

14 Exhibit 8 is an NBC News article dated November 8th, 2025. It's titled, Ghislaine
15 Maxwell's Prison Emails Show She is Happier at Minimum Security Texas Facility.

16 And exhibit 9 is a November 11th, 2025, letter from counsel for Mr. Ting to the
17 chairman of the Committee on the Judiciary, Committee on Oversight and Government
18 Reform, and the Committee on House Administration.

19 [Ting Exhibit Nos. 3 through 9

20 were marked for identification.]

21 BY [REDACTED]:

22 Q Now that I've gone through those exhibits, Mr. Ting, it appears you have
23 chosen to follow your counsel's advice and to claim attorney-client privilege, as well as
24 assert your Fifth Amendment privilege, the latter of which is your right under our
25 Constitution. In doing so, you are refusing to answer any questions asked of you during

1 this deposition.

2 So it should be said upfront that Mr. Ting worked as an in-house attorney for
3 ActBlue, which appears to be the basis for his assertion of attorney-client privilege. And
4 this assertion should not be a surprise to staff.

5 In a letter dated November 11th, 2025, attorneys representing you asked the
6 majority to work with ActBlue to obtain the appropriate waivers of privilege and to define
7 the scope of any perspective testimony by you, Mr. Ting. It does not appear, however,
8 that this committee obtained those waivers or to find the scope of the respective testimony
9 for ActBlue.

10 So this means that whatever question is asked, however unfair or presumptive, you
11 are required to state the same answer that your attorney advised you to make. Is that
12 correct, Mr. Ting?

13 A On the advice of counsel, I must respectfully decline to answer based on the
14 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
15 Constitution.

16 Q So just to be clear, no matter what questions are asked, no matter what I ask
17 you, no matter how egregious I ask it, you're going to answer in exactly the same way,
18 correct?

19 A On the advice of counsel, I must respectfully decline to answer based upon the
20 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
21 Constitution. I must follow my lawyer's advice in this matter.

22 Q So let's take an example, if I were to ask you about President Trump's
23 friendship with Mr. Jeffrey Epstein, including about an email that Mr. Epstein sent to himself
24 on February 1st of 2019 where Mr. Epstein said -- and this is a quote -- "Trump knew of it
25 and came to my house many times during that period." End quote.

1 You're going to answer with the same statement that your attorney advised you to
2 make; is that correct?

3 A On the advice of counsel, I must respectfully decline to answer based upon the
4 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
5 Constitution. I must follow my lawyer's advice in this matter.

6 Q If I asked you whether the majority on this committee is deliberately hiding the
7 Epstein files from the public, refusing to issue subpoenas to obtain those files so they can be
8 released in full, because they're afraid of what might be in those documents, you'd still give
9 the same answer; is that correct?

10 A On the advice of counsel, I must respectfully decline to answer based upon the
11 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
12 Constitution. I must follow my lawyer's advice in this matter.

13 Q What if I asked you about FBI Director Kash Patel, using a government jet,
14 which is paid for by American taxpayers to travel to see his girlfriend perform in
15 Pennsylvania; or using the same jet to take her home to Nashville, as if it's a personal Uber
16 service. And then having the FBI instruct a flight tracking website to stop sharing public
17 data about that aircraft. You are going to answer with the exact same way, aren't you?

18 A On the advice of counsel, I must respectfully decline to answer based upon the
19 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
20 Constitution. I must follow my lawyer's advice in this matter.

21 Q What if I asked you whether you're aware of evidence that WinRed, the
22 Republicans fundraising platform has received seven times more complaints than ActBlue,
23 and yet the chairs of these three committees are yet to write a single letter or issue a single
24 subpoena to WinRed or demand its documents. You'd still give the same answer?

25 A On the advice of counsel, I must respectfully decline to answer based upon the

1 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
2 Constitution. I must follow my lawyer's advice in this matter.

3 Q I believe this might be the last question I ask. What if I asked you about your
4 knowledge about WinRed, utilizing a series of prechecked boxes or tricked donors into
5 making recurring contributions instead of one donation; or WinRed having to issue over
6 \$100 million of refunds to customers who caught the overcharges in the 2020 election, you
7 would still give the same answer; is that correct?

8 A On the advice of counsel, I must respectfully decline to answer based upon the
9 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
10 Constitution. I must follow my lawyer's advice in this matter.

11 Q Thank you, Mr. Ting. We don't have any additional questions. However, we
12 do have several notes for the record. This congressional investigation of ActBlue is a clear
13 back-door effort to assist the DOJ's investigation of ActBlue, which is initiated at the
14 direction of President Donald Trump's April 24th, 2025, executive order. Despite the
15 majority's assertion that the committees are -- and this is a quote -- "are not conducting this
16 investigation in support of any criminal inquiry," end quote. The majority's letter to
17 Attorney General Pam Bondi expressly stated that they looked forward to -- and I again,
18 quote, "working collaboratively," end quote, with DOJ.

19 The coordination between DOJ and Congress to investigate ActBlue at the demand of
20 President Trump is blatant. If our committees are truly concerned over campaign
21 fundraising issues and protecting Americans from fraud, then we would encourage them to
22 expand its investigation to include WinRed, the Republican fundraising platform that has
23 preyed on senior citizens with deceptive tactics. Instead, the majority continued this
24 targeted investigation of ActBlue to try to distract from releasing the Epstein files.

25 So far this Congress, the majority has failed to conduct any -- and I say

1 any -- oversight of this administration. And there are many issues worthy of our
2 committee's attention.

3 For example, the majority in, our committees could investigate the extraordinary and
4 a regular transfer of Ghislaine Maxwell to a minimum security prison in an apparent brazen
5 violation of the Bureau of Prisons regulations and policies that do not allow sex offenders to
6 be held in minimum security prisons. DOJ and the Bureau of Prisons transferred Ms.
7 Maxwell after an unprecedented and unusual interview of her by Deputy Attorney General
8 Todd Blanche.

9 It appears that Ms. Maxwell was also receiving special treatment from the warden at
10 the facility, which our committee should be investigating. Moreover, many of
11 Ms. Maxwell's answers to Mr. Blanche should be also closely scrutinized in light of the
12 documents that were released by my colleagues on House Oversight last week. If Ms.
13 Maxwell provided answers to Mr. Blanche that are inconsistent with her prior
14 communications, the majority should determine whether she made fault statements, and
15 then refer the matter to DOJ as they've done in several other instances, including with
16 House Judiciary.

17 Or maybe the majority on three committees should investigate the President
18 Trump's effort to steal \$230 million from the American people, which he claims are for
19 damages from prior criminal investigations, but what is clearly a shakedown effort and
20 another example of President Trump using the Federal Government and U.S. taxpayers to
21 increase his own wealth.

22 As the House Judiciary Committee minority pointed out in a recent letter to DOJ, the
23 same personal attorneys who represented President Trump in the same cases for which he
24 is now claiming these astronomical damages are now in the position at DOJ to approve this
25 huge payout.

1 There's only one way to describe this. It's plain corruption through and through.
2 And yet, the majority has not said a word.

3 But instead, we continue this investigation to ActBlue without even pretending to
4 investigate WinRed. This is no different than President Trump demanding that DOJ
5 investigate Democrats' ties to Epstein, but not scrutinize his own close relationship with Mr.
6 Epstein, which is apparent in the documents released last week by the House Oversight
7 Committee Democrats.

8 And with that, I want to say thank you for being here, and I think we have -- I will
9 allow Ms. Crockett to state her name for the record as well. She walked in.

10 Ms. Crockett. Again, Congresswoman Jasmine Crockett.

11 [REDACTED]. Ma'am, do you have any follow-up questions for the witness?

12 Ms. Crockett. No.

13 [REDACTED]. With that, we'll go off the record at 10:26 a.m.

14 [Discussion held off the record.]

15 [REDACTED]. If we can go back on the record for one second. I just wanted to read
16 the whole quote from the committee's May 7th, 2025, letter to Attorney General Bondi.
17 My colleague read a selective portion of it. So I'll read the full sentence: As we continue
18 our oversight to inform potential legislative reforms, the committees would like to
19 emphasize the importance of the ActBlue investigation and work collaboratively with DOJ to
20 improve and strengthen the integrity of America's electoral system. Thanks. We can go
21 off the record.

22 [Discussion off the record.]

23 [Whereupon, at 11:26 a.m., the deposition was concluded.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date

Transcribed Interview Transcript Errata Form

Interviewee	Aaron Ting
Date of Interview	11/17/25
Date of Review	11/21/25
Name of Reviewer	Tara N. Tighe, Counsel for Mr. Ting
Signature of Reviewer	Tara N. Tighe

Page	Line	Suggested Correction
4	14 - 14 15	I have marked the September 4 th 2025, Subpoena as Exhibit No. 1. on November 10 th , the committees noticed today's deposition.
7	21 - 22	except to preserve a privilege.
7	25	Finally, I will make note for the members and staff
8	3	testimony or transcripts
9	13 - 14	... does not imply any wrongdoing. To the contrary, as the supreme court...
9	16	Quinn v. United States
12	11	Did Act Blue ban CVVs, gift card...
14	11 - 12	... making large or recurring...
16	7	... scope of any prospective testimony ...
16	8 - 9	... obtained those waivers or defined the scope of the prospective testimony with Act Blue.



Page	Line	Suggested Correction
17	17	You are going to answer in the exact same way, aren't you?
18	4	... utilizing a series of prechecked boxes to trick donors...
18	13	... which was initiated...
19	14	irregular transfer
19	9	Ms. Maxwell is also receiving
19	14	whether she made false statements
19	17	majority on these three committees
20	3	this investigation into Act Blue

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COMMITTEE ON THE JUDICIARY
JOINT WITH THE
COMMITTEE ON HOUSE ADMINISTRATION
AND THE
COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

DEPOSITION OF: ALYSSA TWOMEY

Wednesday, July 23, 2025

Washington, D.C.

1

2 The deposition in the above matter was held in room 2237, Rayburn House Office
3 Building, commencing at 10:02 a.m.

4 Present: Representatives Biggs and Crane.

1 Appearances:

2

3

4

5 For the COMMITTEE ON THE JUDICIARY:

6

7 [REDACTED], DEPUTY DIGITAL DIRECTOR

8 [REDACTED], DEPUTY GENERAL COUNSEL

9 [REDACTED], PROFESSIONAL STAFF MEMBER

10 [REDACTED], PROFESSIONAL STAFF MEMBER

11 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

12 [REDACTED], PROFESSIONAL STAFF MEMBER

13 [REDACTED], MINORITY CHIEF OVERSIGHT COUNSEL

14 [REDACTED], MINORITY SPECIAL COUNSEL FOR INVESTIGATIONS AND SENIOR
15 ADVISOR

16 [REDACTED], MINORITY CHIEF COUNSEL AND SENIOR ADVISOR

17 [REDACTED], MINORITY PROFESSIONAL STAFF MEMBER

18 AND LEGISLATIVE AIDE

19 [REDACTED], MINORITY SENIOR COUNSEL

20 [REDACTED], MINORITY INTERN

21

22

23

1 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

2

3 [REDACTED], SENIOR ADVISOR

4 [REDACTED], DEPUTY STAFF DIRECTOR

5 [REDACTED], COUNSEL

6 [REDACTED], MINORITY LEGAL INTERN

7 [REDACTED], MINORITY COUNSEL

8 [REDACTED], MINORITY COUNSEL

9 [REDACTED], MINORITY CHIEF COUNSEL

10 [REDACTED], MINORITY DEPUTY CHIEF OVERSIGHT COUNSEL

11

12

13 For the COMMITTEE ON HOUSE ADMINISTRATION:

14

15 [REDACTED], GENERAL COUNSEL

16 [REDACTED], SENIOR COUNSEL

17 [REDACTED], DEPUTY GENERAL COUNSEL

18 [REDACTED], MINORITY SENIOR ELECTIONS COUNSEL

19 [REDACTED], MINORITY ELECTIONS COUNSEL

20

21

22 Also Present:

23

24 [REDACTED], LEGISLATIVE ASSISTANT TO REPRESENTATIVE BIGGS

1 For THE WITNESS:

2

3 DANNY C. ONORATO, ESQ.

4 TARA N. TIGHE, ESQ.

5 Schertler, Onorato, Mead & Sears LLP

6 555 13th Street NW

7 Washington, D.C. 20004

1 [REDACTED]: Okay. We can go on the record.

2 Good morning. This is a deposition of Ms. Alyssa Twomey, former vice president
3 of customer service at ActBlue.

4 The Committee on House Administration, the Committee on the Judiciary, and the
5 Committee on Oversight and Government Reform are charged with upholding
6 fundamental American civil liberties and protecting the integrity of American elections.

7 In light of allegations that online fundraising platforms that serve as conduits for
8 political donations have accepted fraudulent donations from domestic and foreign
9 sources, the committees are conducting oversight to inform potential legislative reforms.

10 To further the committees' oversight and legislative reforms, the chairmen
11 requested a deposition today.

12 On June 24th, 2025, the committees issued subpoenas for Ms. Twomey to appear
13 at a deposition today, July 23rd. I've marked the subpoenas as exhibit No. 1.

14 [Twomey Exhibit No. 1
15 was marked for identification.]

16 [REDACTED]: On July 16th, the committees noticed today's deposition. I have
17 marked the July 16 notice as exhibit No. 2.

18 [Twomey Exhibit No. 2
19 was marked for identification.]

20 [REDACTED]: Would the witness please state your name for the record?
21 The Witness. Alyssa Twomey, T-w-o-m-e-y.

22 [REDACTED]: And could counsel please state your name for the record?
23 Mr. Onorato. Sure. Danny Onorato.

24 Ms. Tighe. Tara Tighe.

25 [REDACTED]: Thank you.

1 My name is [REDACTED], and I'm with Chairman Jordan's Judiciary staff.
2 I'll now have everyone else from the committees who are here in the room
3 introduce themselves as well.

4 [REDACTED] - [REDACTED], with Chairman Jordan's staff.

5 Mr. Crane. Representative Eli Crane.

6 [REDACTED] - [REDACTED], with Ranking Member Raskin's staff.

7 [REDACTED] - [REDACTED], with Ranking Member Joe Morelle's staff.

8 [REDACTED] - [REDACTED], with Ranking Member Garcia's staff.

9 [REDACTED] - [REDACTED], with the Committee on House Administration
10 majority.

11 [REDACTED] - [REDACTED], counsel for Chairman Comer.

12 [REDACTED] - [REDACTED], with the Committee on House Administration.

13 [REDACTED] - [REDACTED], Committee on House Administration.

14 [REDACTED] - [REDACTED], Committee on the Judiciary.

15 [REDACTED] - [REDACTED], Committee on the Judiciary minority.

16 [REDACTED] - [REDACTED], House Oversight Democratic staff.

17 [REDACTED] - [REDACTED], House Oversight minority staff.

18 [REDACTED] - [REDACTED], Oversight Committee majority.

19 [REDACTED] - [REDACTED], Oversight majority.

20 [REDACTED] - [REDACTED], Chairman Jordan's staff.

21 [REDACTED] - [REDACTED], with Chairman Jordan's staff.

22 [REDACTED] - [REDACTED], Chairman Jordan's staff.

23 [REDACTED] - [REDACTED], Chairman Jordan's staff.

24 [REDACTED] - [REDACTED], House Admin minority staff.

25 [REDACTED] - [REDACTED], Ranking Member Raskin's office.

1 [REDACTED]: [REDACTED], Ranking Member Raskin's staff.

2 [REDACTED]: Thank you.

3 I'll now review the ground rules and guidelines that we will follow during today's
4 deposition.

5 The committees will conduct today's deposition in accordance with the House
6 regulations for the use of deposition authority, which we have provided copies to your
7 attorneys.

8 Our questioning will proceed in rounds. The majority will ask questions first for 1
9 hour; then the minority will have an opportunity to ask questions for an equal period of
10 time if they choose.

11 There will be two staff counsel per side asking the questions. To the extent
12 Members have questions for the witness, they will be propounded during their side's
13 respective rounds.

14 The clock will stop if the witness needs to confer with counsel, when counsel for
15 the witness is speaking, and when Members are speaking during the opposite side's
16 round.

17 We will alternate back and forth until there are no more questions and the
18 deposition is over.

19 We ordinarily take a short break at the end of each hour, but if you would like to
20 take a break apart from that, please just let us know.

21 As you can see, there is an official court reporter taking down everything we say to
22 make a written record, so we ask that you give verbal responses to all questions.

23 Do you understand?

24 The Witness. On the advice of counsel, I must respectfully decline to answer, in
25 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,

1 and I must follow my lawyers' advice in this matter.

2 [REDACTED]: So the court reporter can take down a clear record, please try and
3 speak clearly so the court reporter can understand and so the people at the end of the
4 table and in the room can hear you.

5 It is important that we do not talk over one another or interrupt each other if we
6 can help it, and that goes for everybody present at today's deposition.

7 We want you to answer our questions in a complete and truthful manner. If you
8 do not understand one of our questions or need clarification about what we are seeking,
9 please just let us know.

10 If you do not know the answer to a question or do not remember, please tell us
11 what you do know and remember.

12 It is okay to tell us if you learned information from someone else. Just indicate
13 how you came to know the information.

14 If there are things you do not know or cannot remember, just say so, and please
15 inform us who, to the best of your knowledge, might be able to provide a more complete
16 answer to the question.

17 By law, you are required to answer questions from Congress truthfully. Do you
18 understand that?

19 The Witness. On the advice of counsel, I must respectfully decline to answer, in
20 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
21 and I must follow my lawyers' advice in this matter.

22 [REDACTED]: This also applies to questions posed by congressional staff in a
23 deposition. Do you understand this?

24 The Witness. On the advice of counsel, I must respectfully decline to answer, in
25 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,

1 and I must follow my lawyers' advice in this matter.

2 [REDACTED]: Witnesses that knowingly provide false testimony could be subject
3 to criminal prosecution for perjury. This includes, for example, stating that you do not
4 recall or remember something when, in fact, you do.

5 Do you understand this?

6 The Witness. On the advice of counsel, I must respectfully decline to answer, in
7 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
8 and I must follow my lawyers' advice in this matter.

9 [REDACTED]: Furthermore, you cannot tell half-truths or exclude information
10 necessary to make statements accurate. You are required to provide all information
11 that would make your response truthful. A deliberate failure to disclose information can
12 constitute a false statement.

13 Do you understand this?

14 The Witness. On the advice of counsel, I must respectfully decline to answer, in
15 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
16 and I must follow my lawyers' advice in this matter.

17 [REDACTED]: Is there any reason you are unable to provide truthful answers to
18 today's questions?

19 The Witness. On the advice of counsel, I must respectfully decline to answer, in
20 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
21 and I must follow my lawyers' advice in this matter.

22 [REDACTED]: You should know that the Federal Rules of Evidence, Criminal and
23 Civil Procedure are not applicable for today's deposition.

24 Under the House deposition regulation, a witness's attorney may not instruct a
25 witness to refuse to answer a question except to preserve a privilege. The House

1 recognizes constitutionally based privileges and not necessarily those privileges derived
2 from common law.

3 Finally, I will make note for the Members and staff here today that the content of
4 what we discuss here today in the room is confidential under the House deposition
5 regulations.

6 Under the rules, the chairmen and ranking minority members shall consult before
7 any release of testimony, transcripts, including portions thereof, are released. This
8 means it is a violation of House and committee rules to disclose content of the deposition
9 prior to its official release.

10 For this reason, the marked exhibits that we will use today will remain with the
11 court reporter so they can go in the official transcript, and any copies of those exhibits
12 will be returned to us when we wrap up.

13 Before we begin the first round of questions, we will afford the minority, the
14 witness, and counsel for the witness the opportunity to offer any preliminary remarks.

15 Do my colleagues from the minority have anything?

16 [REDACTED]: I just want to say thank you for being here today, and also note
17 that this is being recorded. No need to answer; just wanted to make that aware for you.

18 [REDACTED]: Mr. Onorato, do you have anything?

19 Mr. Onorato. Thank you.

20 Good morning. My name is Danny Onorato. Tara Tighe and I represent Alyssa
21 Twomey.

22 When first contacted by the committees, Ms. Twomey, through counsel,
23 consistently expressed her intent to cooperate with this investigation.

24 However, on April 24th of 2025, President Trump issued a Presidential
25 memorandum which directed the Attorney General of the United States to investigate her

1 former employer, ActBlue, for the same issues being investigated by these committees.
2 President Trump directed the Attorney General to report the results of that investigation
3 within an expedited timeframe of 180 days.

4 In light of that pending DOJ investigation, we, as Ms. Twomey's lawyers, asked the
5 committee to postpone this deposition until after that parallel Department of Justice
6 inquiry was finished.

7 The request for a modest adjournment was rejected by the committees while, at
8 the same time, the committees pledged to, quote, "work collaboratively with the DOJ."

9 Given these developments and the committees' insistence on proceeding today, it
10 leaves Ms. Twomey no choice but to follow the advice of her lawyers and assert her Fifth
11 Amendment right under the Constitution of the United States.

12 In so doing, she follows in the footsteps of many other Americans that appear in
13 proceedings before this Congress and elsewhere by invoking fundamental rights
14 guaranteed by the Constitution.

15 We want to emphasize that asserting the Fifth Amendment privilege does not
16 imply that Ms. Twomey or anyone else has engaged in any wrongdoing. In fact, to the
17 contrary, as our Supreme Court has recognized more than a century ago, the Fifth
18 Amendment is, quote, "a protection to the innocent" and "a safeguard against heedless,
19 unfounded, or tyrannical prosecutions."

20 Ms. Twomey will therefore respectfully decline to answer questions that might be
21 posed today before the committee.

22 Thank you.

23 [REDACTED]: Thank you.

24 The court reporter will now swear the witness in.

25 The Reporter. Please raise your right hand.

1 Do you solemnly declare and affirm under penalty of perjury that the testimony
2 you are about to give will be the truth, the whole truth, and nothing but the truth?

3 The Witness. Yes.

4 [REDACTED]: Thank you.

5 The clock now reads 10:09 a.m. We'll start with the first round of questions.

6 EXAMINATION

7 BY [REDACTED]:

8 Q Ms. Twomey, when did you start working at ActBlue?

9 A On the advice of counsel, I must respectfully decline to answer, in reliance
10 on my right under the Fifth Amendment of the Constitution. I am not a lawyer, and I
11 must follow my lawyers' advice in this matter.

12 Q During your tenure at ActBlue, can you describe your relationship with the
13 fraud prevention team at ActBlue?

14 A On the advice of counsel, I must respectfully decline to answer, in reliance
15 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
16 must follow my lawyers' advice in this matter.

17 Q And how many people reported to you while you were at ActBlue?

18 A On the advice of counsel, I must respectfully decline to answer, in reliance
19 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
20 must follow my lawyers' advice in this matter.

21 Q Ms. Twomey, why is ActBlue so bad at stopping fraudulent donations?

22 A On the advice of counsel, I must respectfully decline to answer, in reliance
23 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
24 must follow my lawyers' advice in this matter.

25 Q Why does ActBlue review so many fewer transactions for fraud than an

1 ordinary website?

2 A On the advice of counsel, I must respectfully decline to answer, in reliance
3 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
4 must follow my lawyers' advice in this matter.

5 Q Does ActBlue willingly turn a blind eye to fraud so that campaigns can
6 increase fundraising on ActBlue?

7 A On the advice of counsel, I must respectfully decline to answer, in reliance
8 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
9 must follow my lawyer's advice in this matter.

10 Q Were you ever part of a conspiracy to launder foreign money into fraudulent
11 donations for campaigns using ActBlue?

12 A On the advice of counsel, I must respectfully decline to answer, in reliance
13 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
14 must follow my lawyers' advice in this matter.

15 Q Does ActBlue instruct donors or campaigns about how they can evade
16 ActBlue's fraud-prevention processes?

17 A On the advice of counsel, I must respectfully decline to answer, in reliance
18 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
19 must follow my lawyers' advice in this matter.

20 Q Why did the 2024 goals of ActBlue's top fraud specialist include allowing
21 more fraud on ActBlue?

22 A On the advice of counsel, I must respectfully decline to answer, in reliance
23 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
24 must follow my lawyers' advice in this matter.

25 Q According to documents produced to the committees, in 2024 ActBlue took

1 a more lenient approach to fraud by increasing Sift score thresholds.

2 Why did ActBlue take a more lenient approach?

3 A On the advice of counsel, I must respectfully decline to answer, in reliance
4 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
5 must follow my lawyers' advice in this matter.

6 Q Was the policy in an effort to increase donations to campaigns?

7 A On the advice of counsel, I must respectfully decline to answer, in reliance
8 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
9 must follow my lawyers' advice in this matter.

10 Q Did you ever receive direction from ActBlue executives to allow more fraud
11 on the platform or weaken ActBlue's fraud-prevention defenses?

12 A On the advice of counsel, I must respectfully decline to answer, in reliance
13 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
14 must follow my lawyers' advice in this matter.

15 Q Does ActBlue only make fraud-prevention policy changes that positively
16 affect the number of donations on its platform?

17 A On the advice of counsel, I must respectfully decline to answer, in reliance
18 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
19 must follow my lawyers' advice in this matter.

20 Q Does ActBlue not institute fraud-prevention policies if they would negatively
21 affect the number of donations on the platform?

22 A On the advice of counsel, I must respectfully decline to answer, in reliance
23 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
24 must follow my lawyers' advice in this matter.

25 Q In 2024, did ActBlue ban gift card donations, prepaid donations, and foreign

1 donations and newly require CVVs because it was worried about legal scrutiny of fraud
2 committed using these mechanisms?

3 A On the advice of counsel, I must respectfully decline to answer, in reliance
4 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
5 must follow my lawyers' advice in this matter.

6 Q How many times has ActBlue determined that bad actors have coordinated a
7 big fraud attack where each individual donation fell below the Sift threshold?

8 A On the advice of counsel, I must respectfully decline to answer, in reliance
9 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
10 must follow my lawyers' advice in this matter.

11 Q Why doesn't ActBlue cooperate with internal bank investigations of
12 potentially fraudulent transactions?

13 A On the advice of counsel, I must respectfully decline to answer, in reliance
14 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
15 must follow my lawyer's advice in this matter.

16 Q Do you have any information regarding whether Zain Ahmad was placed on
17 leave by ActBlue because he chose to blow the whistle on pervasive fraud and
18 misconduct?

19 A On the advice of counsel, I must respectfully decline to answer, in reliance
20 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
21 must follow my lawyers' advice in this matter.

22 Q Why did you and six other senior staff members resign from ActBlue in
23 February 2025?

24 A On the advice of counsel, I must respectfully decline to answer, in reliance
25 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I

1 must follow my lawyers' advice in this matter.

2 Q Were the resignations related to pervasive fraud and misconduct at ActBlue?

3 A On the advice of counsel, I must respectfully decline to answer, in reliance
4 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
5 must follow my lawyers' advice in this matter.

6 Mr. Biggs. Thank you.

7 Hi. My name is Andy Biggs. I am a Congressman from Arizona's Fifth
8 Congressional District. Thank you for being here today.

9 Just a couple questions regarding various areas.

10 Counsel just was referring to you -- referred to you the questioning dealing with
11 seven senior executives who left the company in February of 2024 -- 2025. Do you know
12 who those seven were?

13 The Witness. On the advice of counsel, I must respectfully decline to answer, in
14 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
15 and I must follow my lawyers' advice in this matter.

16 Mr. Biggs. Are you familiar with Sift?

17 The Witness. On the advice of counsel, I must respectfully decline to answer, in
18 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
19 and I must follow my lawyers' advice in this matter.

20 Mr. Biggs. What was your main contact -- main point of contact at Sift?

21 The Witness. On the advice of counsel, I must respectfully decline to answer, in
22 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
23 and I must follow my lawyers' advice in this matter.

24 Mr. Biggs. Tell us again about the seven -- the seven people -- seven executives
25 who left in February of this year.

1 member -- or from the chairmen of House Admin, House Oversight, and House Judiciary
2 to Attorney General Pam Bondi dated May 7th, 2025.

3 [Twomey Exhibit No. 4
4 was marked for identification.]

5 [REDACTED]: Exhibit 5 will be a CNN article related to the deceptive political
6 fundraising practices, including with WinRed. It's dated October 22nd, 2024.

7 [Twomey Exhibit No. 5
8 was marked for identification.]

9 [REDACTED]: And exhibit 6, which we'll enter into the record after the next
10 break, will be a letter from the ranking members of House Admin, House Oversight, and
11 House Judiciary to the Department of the Treasury about WinRed. And this letter is
12 dated May 14th, 2025.

13 [Twomey Exhibit No. 6
14 was marked for identification.]

15 EXAMINATION

16 BY [REDACTED]:

17 Q Good morning again, Ms. Twomey. I'm [REDACTED]. I'm with House
18 Judiciary, the minority. I'm joined by [REDACTED], who's also with House Oversight in
19 the minority.

20 So, Ms. Twomey, you've chosen to follow your counsels' advice here today and
21 assert your Fifth Amendment privilege, which is your right under the Constitution. And,
22 in doing so, you're not answering any questions asked of you during this deposition.

23 So this means that whatever question is asked, however unfair or however
24 presumptive that question is, you're going to follow the advice of your attorney. Is that
25 correct?

1 A On the advice of counsel, I must respectfully decline to answer, in reliance
2 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
3 must follow my lawyers' advice in this matter.

4 Q So no matter what questions are asked, no matter what I ask, no matter
5 what the majority asks, you're going to answer in exactly the same way. Is that correct?

6 A On the advice of counsel, I must respectfully decline to answer, in reliance
7 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
8 must follow my lawyers' advice in this matter.

9 Q Now, the majority has claimed that this investigation, part of it's focused on
10 this foreign influence in our political system.

11 So if I were to ask you, for example, whether there's evidence that President
12 Trump is currently violating the Constitution and enriching himself by accepting an
13 opulent, \$400-million airplane from the royal family of Qatar, which would be donated,
14 for example, to his personal use after he leaves office, all while giving the Qataris lucrative
15 arms and trade deals, you're going to answer with the same statement that your attorney
16 has advised you. Is that correct?

17 A On the advice of counsel, I must respectfully decline to answer, in reliance
18 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
19 must follow my lawyers' advice in this matter.

20 Q And if I asked you whether it's a gross ethical violation and evidence of
21 corruption for President Trump's company -- which, I'd like to note, benefits him
22 directly -- to use access to him as an incentive in exchange for hundreds of millions of
23 dollars of investment in his otherwise-worthless meme coin, and inviting hundreds of
24 largely foreign and mostly anonymous investors to a personal dinner as a reward for their
25 investment, you're going to answer with the same statement your attorney has advised

1 you to, correct?

2 A On the advice of counsel, I must respectfully decline to answer, in reliance
3 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
4 must follow my lawyers' advice in this matter.

5 Q What if I asked you whether you're aware of evidence that WinRed, the
6 Republicans' fundraising platform, has received seven times more complaints than
7 ActBlue, and yet the chairs of these three committees have yet to write a single letter or
8 issue a single subpoena to WinRed or to demand its documents? You'd still give the
9 same answer, wouldn't you?

10 A On the advice of counsel, I must respectfully decline to answer, in reliance
11 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
12 must follow my lawyers' advice in this matter.

13 Q This will be my last question, I think.

14 What if I asked you whether President Trump and the Department of Justice are
15 deliberately hiding the Epstein files from the public, refusing to release them in full,
16 because they're afraid of what might be in these documents? You'd give the same
17 answer, wouldn't you?

18 A On the advice of counsel, I must respectfully decline to answer, in reliance
19 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
20 must follow my lawyers' advice in this matter.

21 [REDACTED]: Thank you, Ms. Twomey.

22 We don't have any additional questions. However, we do have a couple notes
23 for the record.

24 Look, it's not surprising that you're invoking your Fifth Amendment privilege today
25 in response to the questions that we've asked. This congressional investigation of

1 ActBlue is a clear backdoor effort to assist the DOJ's investigation of ActBlue, which was
2 initiated at the direction of President Donald Trump's April 24th, 2025, executive order.

3 Despite the majority's assertion that the committees -- and this is a quote -- "are
4 not conducting this investigation in support of any criminal inquiry," end quote, the
5 majority's letter to Attorney General Pam Bondi expressly stated that they looked forward
6 to, quote, "working collaboratively," end quote, with DOJ.

7 The coordination between DOJ and Congress to investigate ActBlue at the demand
8 of President Trump, it's blatant.

9 Furthermore, ActBlue has been voluntarily cooperating with our committees until
10 President Trump directed DOJ to investigate them in an executive order. So far, ActBlue
11 has produced nearly 3,500 pages of documents in response to the committees' inquiry,
12 with minimal redactions, we should note.

13 If our committees are truly concerned over campaign fundraising issues and
14 protecting Americans from fraud, then we would encourage them to expand this
15 investigation to include WinRed, the Republican fundraising platform that has preyed on
16 senior citizens with deceptive tactics.

17 Further, if the majority truly cared about foreign interference in our elections, as it
18 has claimed in its interim report, they would join committee Democrats in investigating
19 other issues, such as President Trump pressuring the Qatari royal family for a \$400-million
20 ultra-luxury jetliner.

21 But, instead, the majority continues its targeted investigation of ActBlue to try to
22 distract from releasing the Epstein files. So far this Congress, the majority has failed to
23 conduct any oversight of this administration or call a single administration witness to any
24 transcribed interview, deposition, or hearing.

25 So I want to say thank you.

1 And, with that, we'll go off the record.

2 Is that it?

3 [REDACTED]: Yep.

4 [REDACTED]: All right.

5 [Whereupon, at 10:27 a.m., the deposition was concluded.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date

Transcribed Interview Transcript Errata Form

Interviewee	Alyssa Twomey
Date of Interview	July 23, 2025
Date of Review	July 28, 2025
Name of Reviewer	Tara N. Tighe, counsel for Ms. Twomey
Signature of Reviewer	Tara N. Tighe

Page	Line	Suggested Correction
6	12	Change "June 24, 2025" to June 25, 2025 to reflect correct date of subpoenas.
12	8	The quotation marks should only be around the words "work collaboratively."
12	20	Add the word "any" between "answer" and "questions" so that it reads "decline to answer any questions."
14	1	Add the word "retail" between "ordinary" and "website."
20	9-10	The phrase "part of it's focused on this foreign influence" should read "part of what it's focused on is foreign influence."

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COMMITTEE ON THE JUDICIARY,
JOINT WITH THE
COMMITTEE ON HOUSE ADMINISTRATION
AND THE
COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

DEPOSITION OF: DARRIN HURWITZ

Wednesday, November 19, 2025

Washington, D.C.

The deposition in the above matter was held in room 2237, Rayburn House Office Building, commencing at 10:00 a.m.

Present: Representatives Donalds and Gooden.

1 Appearances:

2

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5 For the COMMITTEE ON THE JUDICIARY:

6

7 [REDACTED], DEPUTY GENERAL COUNSEL

8 [REDACTED], PROFESSIONAL STAFF MEMBER

9 [REDACTED], DIGITAL DIRECTOR

10 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

11 [REDACTED], RESEARCH ASSISTANT

12 [REDACTED], MINORITY SPECIAL COUNSEL

13 FOR INVESTIGATIONS AND SENIOR ADVISOR

14 [REDACTED], MINORITY CHIEF COUNSEL AND SENIOR ADVISOR

15 [REDACTED], MINORITY FELLOW

16 [REDACTED], MINORITY LEGAL INTERN

17 [REDACTED], MINORITY INTERN

18 [REDACTED], MINORITY SENIOR COUNSEL

19

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21 For the COMMITTEE ON HOUSE ADMINISTRATION:

22

23 [REDACTED], COUNSEL

24 [REDACTED], MINORITY COUNSEL

25

1 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

2

3 [REDACTED], SENIOR ADVISORY TO CHAIRMAN COMER

4 [REDACTED], SENIOR COUNSEL

5 [REDACTED], COUNSEL

6 [REDACTED], LEGAL INTERN

7 [REDACTED], MINORITY DEPUTY CHIEF COUNSEL

8

9

10 For The WITNESS:

11

12 DANNY C. ONORATO

13 TARA N. TIGHE

14 Schertler, Onorato, Mead & Sears, LLP

15 555 13th Street NW, Suite 500 West

16 Washington, D.C. 20004

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1 [REDACTED]: We'll go on the record.

2 Good morning. This is a deposition of Mr. Hurwitz, former general counsel at
3 ActBlue.

4 The Committee on House Administration, the Committee on the Judiciary, and the
5 Committee on Oversight and Government Reform are charged with upholding fundamental
6 American civil liberties and protecting the integrity of American elections.

7 In light of allegations that online funding platforms that serve as conduits for political
8 donations have accepted fraudulent donations from domestic and foreign sources, the
9 committees are conducting oversight to inform potential legislative reforms.

10 To further the committees' oversight and legislative reforms, the chairmen have
11 requested a deposition with Mr. Hurwitz.

12 On September 4th, 2025, the committees issued subpoenas for Mr. Hurwitz to
13 appear at a deposition on October 28th. After conferring with counsel, the committees
14 agreed to move the deposition to today, November 19th.

15 I have marked the September 4th, 2025, subpoena as exhibit No. 1.

16 [Hurwitz Exhibit No. 1
17 was marked for identification.]

18 [REDACTED]: On November 12th, the committees noticed today's deposition. I
19 have marked the November 12th notice as exhibit No. 2.

20 [Hurwitz Exhibit No. 2
21 was marked for identification.]

22 [REDACTED]: Would the witness please state your name for the record?

23 The Witness. Darrin Hurwitz.

24 [REDACTED]: Thank you.

25 Could counsel please state your name for the record?

1 Mr. Onorato. Sure. Danny Onorato.

2 Ms. Tighe. Good morning. Tara Tighe.

3 [REDACTED]: My name is [REDACTED], and I'm with Chairman Jordan's staff.

4 I'll now have everyone else from the committees, including members who are here,
5 introduce themselves as well.

6 [REDACTED]: [REDACTED], Chairman Jordan's staff.

7 Mr. Gooden. Lance Gooden, Texas-5.

8 [REDACTED]: [REDACTED], Ranking Member Garcia.

9 [REDACTED]: [REDACTED] with Ranking Member Raskin's staff.

10 [REDACTED]: [REDACTED] with Ranking Member Morelle.

11 [REDACTED]: [REDACTED], legal intern, minority under Ranking Member Garcia.

12 [REDACTED]: [REDACTED] with Chairman Comer's staff.

13 [REDACTED]: [REDACTED] with Chairman Comer's staff.

14 [REDACTED]: [REDACTED], Chairman Jordan's staff.

15 [REDACTED]: [REDACTED], Chairman Jordan.

16 [REDACTED]: [REDACTED], Ranking Member Raskin's staff.

17 [REDACTED]: [REDACTED], Ranking Member Raskin's staff.

18 [REDACTED]: [REDACTED], Ranking Member Raskin's staff.

19 [REDACTED]: [REDACTED], Ranking Member Raskin's staff.

20 [REDACTED]: [REDACTED], Chairman Steil's staff.

21 [REDACTED]: [REDACTED], Oversight majority, Chairman Comer.

22 [REDACTED]: [REDACTED], Chairman Jordan's staff.

23 [REDACTED]: [REDACTED], Ranking Member Raskin's staff.

24 [REDACTED]: Thank you.

25 I will now review the ground rules and guidelines that we will follow during today's

1 deposition.

2 The committees will conduct today's deposition in accordance with the House's
3 regulation for the use of deposition authority.

4 Our questioning will proceed in rounds. The majority will ask questions first for one
5 hour. Then the minority will have an opportunity to ask questions for an equal period of
6 time if they choose.

7 There will be two staff counsel per side asking the questions. To the extent
8 members have questions for the witness, they will be propounded during their side's
9 respective round.

10 The clock will stop if the witness needs to confer with counsel, when the counsel for
11 the witness is speaking, and when members are speaking during the opposite side's round.

12 We'll alternate back and forth until there are no more questions and the deposition
13 is over.

14 We ordinarily take a short break at the end of each hour. If you would like a break
15 apart from that, please just let us know.

16 As you can see, there is an official court reporter taking down everything we say to
17 make a written record. So we ask that you give verbal responses to all questions.

18 Do you understand?

19 The Witness. Yes.

20 [REDACTED]. So the court reporter can take down a clear record, please try and
21 speak clearly and so the people that are down at the end of the table can hear you as well.

22 It is important that we do not talk over one another or interrupt each other, if we
23 can help it, and that goes for everybody present at today's deposition.

24 We want you to answer our questions in a complete and truthful manner. If you do
25 not understand one of our questions or need clarification about what we are seeking, please

1 let us know.

2 If you do not know the answer to a question or do not remember, please tell us what
3 you do know and remember. It is okay to tell us if you learned information from someone
4 else. Just indicate how you came to know the information.

5 If there are things you do not know or cannot remember, just say so, and please
6 inform us who, to the best of your knowledge, might be able to provide a more complete
7 answer to the question.

8 By law, you are required to answer questions from Congress truthfully.

9 Do you understand that?

10 The Witness. Yes.

11 [REDACTED]: This also applies to questions posed by congressional staff in a
12 deposition.

13 Do you understand this?

14 The Witness. Yes.

15 [REDACTED]: Witnesses that knowingly provide false testimony could be subject to
16 criminal prosecution for perjury. This includes, for example, stating that you do not recall
17 or remember something when, in fact, you do.

18 Do you understand this?

19 The Witness. Yes.

20 [REDACTED]: Furthermore, you cannot tell half-truths or exclude information
21 necessary to make statements accurate. You are required to provide all information that
22 would make your response truthful. A deliberate failure to disclose information can
23 constitute a false statement.

24 Do you understand this?

25 The Witness. Yes.

1 [REDACTED]. Is there any reason you are unable to provide truthful answers to
2 today's questions?

3 The Witness. On the advice of counsel, I must respectfully decline to answer based
4 upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to
5 the Constitution. I must follow my lawyer's advice in this matter.

6 [REDACTED]. The Federal Rules of Evidence, Criminal and Civil Procedure are not
7 applicable for today's deposition. Under the House deposition regulation, a witness'
8 attorney may not instruct a witness to refuse to answer a question, except to preserve a
9 privilege.

10 The House recognizes constitutionally based privileges and not necessarily those
11 privileges derived from common law.

12 Finally, I will make note for the members and staff here today that the content of
13 what we discuss here is confidential under the House deposition regulation.

14 Under the rules, the chairmen and ranking minority members shall consult before
15 any release of testimony transcripts, including portions thereof. This means it is a violation
16 of House and committee rules to disclose the content of the deposition prior to its official
17 release.

18 For this reason, the marked exhibits that we will use today will remain with the court
19 reporter so that they can go in the official transcript and any copies of those exhibits will be
20 returned to us when we wrap up.

21 Before we begin the first round of questions, I want to make note that we did have
22 another member join us.

23 If you would like to note yourself for the record, sir.

24 Mr. Donalds. Congressman Byron Donalds, Florida's 19th Congressional District.

25 [REDACTED]. Thank you.

1 We will also afford the minority, the witness, and counsel for the witness the
2 opportunity to offer any preliminary remarks.

3 [REDACTED]: I just want to thank you for being here today. I do appreciate it. I
4 would like to note for your awareness that it is being recorded.

5 [REDACTED]: Mr. Onorato?

6 Mr. Onorato. Thank you. Good morning.

7 My name is Danny Onorato. My colleague Tara Tighe and I represent Darrin
8 Hurwitz, the former attorney for ActBlue.

9 When the committees first contacted us in May of 2025, we promptly requested that
10 the committees confer with ActBlue to address two critical matters: first, whether ActBlue
11 would authorize a waiver of the attorney-client privilege; and second, the scope of any
12 potential testimony by attorney clients.

13 The committees have not engaged with ActBlue on these issues, and this failure has
14 created the situation we face today.

15 Mr. Hurwitz is a licensed attorney bound by the Rules of Professional Responsibility
16 and Ethics. They impose mandatory duties to preserve the attorney-client privilege and
17 protect client confidences. These obligations do not cease when an attorney leaves a
18 client's employment. They continue indefinitely.

19 Both legal precedent and ethical rules are abundantly clear. Absent a waiver of the
20 attorney-client privilege, an attorney must take all necessary measures to protect client
21 confidences when responding to questions from Congress.

22 If an attorney fails to assert privilege, he or she may inadvertently waive that
23 privilege over information provided, a waiver that simply cannot be undone.

24 Moreover, an attorney who discloses privileged information without client
25 authorization faces severe professional consequences, including potential suspension or

1 even disbarment.

2 Mr. Hurwitz cannot and will not jeopardize his law license by breaching his ethical
3 duties and obligations.

4 Given the committees' failure to work with ActBlue to obtain an appropriate waiver
5 or define the scope of permissible testimony, Mr. Hurwitz has no alternative, he must
6 protect all privileged information.

7 Thus, following the advice of counsel, Mr. Hurwitz will assert the attorney-client
8 privilege, as well as his Fifth Amendment privilege, today.

9 We want to emphasize unequivocally that asserting the Fifth does not imply any
10 wrongdoing. To the contrary, as the Supreme Court has recognized more than a century
11 ago, the Fifth Amendment is, quote, "a protection to the innocent," end quote, and "a
12 safeguard against heedless, unfounded, or tyrannical prosecutions." That's *Quinn v.*
13 *United States*, 349 U.S. 155, 1955.

14 Simply put, Mr. Hurwitz's assertions of privilege are mandated by these
15 circumstances.

16 [REDACTED]: Thank you.

17 The court reporter will now swear the witness in.

18 The Reporter. Yes, ma'am.

19 Sir, will you please raise your right hand?

20 Do you solemnly declare and affirm under the penalty of perjury that the testimony
21 you are about to give today will be the truth, the whole truth, and nothing but the truth?

22 The Witness. I do.

23 The Reporter. Thank you.

24 [REDACTED]: The clock now reads 10:08 a.m. We will start the first hour of
25 questioning.

EXAMINATION

1
2 BY [REDACTED]:

3 Q Mr. Hurwitz, when did you work at ActBlue?

4 A On the advice of counsel, I must respectfully decline to answer based upon the
5 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
6 Constitution. I must follow my lawyer's advice in this matter.

7 Q What were your job responsibilities at ActBlue?

8 A On the advice of counsel, I must respectfully decline to answer based upon the
9 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
10 Constitution. I must follow my lawyer's advice in this matter.

11 Q Were you removed from your position in November 2024 because of ActBlue's
12 inability to deter fraudulent and illegal donations?

13 A On the advice of counsel, I must respectfully decline to answer based upon the
14 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
15 Constitution. I must follow my lawyer's advice in this matter.

16 Q Can you testify as to why every lawyer on the legal team and the entire
17 compliance team at ActBlue resigned or went on leave by March 2025?

18 A On the advice of counsel, I must respectfully decline to answer based upon the
19 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
20 Constitution. I must follow my lawyer's advice in this matter.

21 Q Did you or anyone at ActBlue retaliate against Zain Ahmad for speaking up
22 about pervasive fraud at ActBlue?

23 A On the advice of counsel, I must respectfully decline to answer based upon the
24 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
25 Constitution. I must follow my lawyer's advice in this matter.

1 Q After the entire legal team left, was ActBlue able to carry out its legal
2 obligations and deter bad actors?

3 A On the advice of counsel, I must respectfully decline to answer based upon the
4 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
5 Constitution. I must follow my lawyer's advice in this matter.

6 Q Why is ActBlue so bad at stopping fraudulent donations?

7 A On the advice of counsel, I must respectfully decline to answer based upon the
8 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
9 Constitution. I must follow my lawyer's advice in this matter.

10 Q While you were at ActBlue, did anyone instruct you or did you instruct anyone
11 on ActBlue's staff to turn a blind eye to fraud so that a campaign could increase its
12 fundraising on the platform?

13 A On the advice of counsel, I must respectfully decline to answer based upon the
14 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
15 Constitution. I must follow my lawyer's advice in this matter.

16 Q Why did ActBlue take a more lenient approach to fraud in 2024?

17 A On the advice of counsel, I must respectfully decline to answer based upon the
18 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
19 Constitution. I must follow my lawyer's advice in this matter.

20 [REDACTED]. I believe Mr. Gooden has some questions.

21 Mr. Gooden. As general counsel and a key stakeholder for fraud prevention at
22 ActBlue, did you notice an increase or decrease in fraudulent transactions in and around the
23 2024 election cycle?

24 The Witness. On the advice of counsel, I must respectfully decline to answer based
25 upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to

1 the Constitution. I must follow my lawyer's advice in this matter.

2 Mr. Gooden. There was a reported increase in fraudulent contributions, but
3 ActBlue still adopted several policy changes which made it easier for fraud to take place.

4 As a stakeholder for fraud prevention and the head of the legal team, what steps did
5 you take to prevent fraud? And what was your recommendation regarding the policy
6 changes in April 2024 and July 2024 reducing the threshold for review?

7 The Witness. On the advice of counsel, I must respectfully decline to answer based
8 upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to
9 the Constitution. I must follow my lawyer's advice in this matter.

10 Mr. Gooden. Based on ActBlue's internal policy changes, it seems that fraud
11 prevention safeguards were weakened during most of the campaign period of the 2024
12 election.

13 Shortly before the election, there were policy changes at ActBlue to ban
14 contributions from foreign prepaid cards and gift cards.

15 What was the reason for these bans? And did you or someone at ActBlue observe
16 any issues being caused by these modes of payment?

17 The Witness. On the advice of counsel, I must respectfully decline to answer based
18 upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to
19 the Constitution. I must follow my lawyer's advice in this matter.

20 Mr. Gooden. ActBlue's records indicate that abuse of prepaid cards and gift cards
21 was prevalent. And I'm curious, why was this ban instituted only a couple of weeks before
22 the election?

23 The Witness. On the advice of counsel, I must respectfully decline to answer based
24 upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to
25 the Constitution. I must follow my lawyer's advice in this matter.

1 Mr. Gooden. You received a severance package of almost \$170,000. Did you
2 receive that for resigning or being terminated from your position at ActBlue or for any other
3 reason?

4 The Witness. On the advice of counsel, I must respectfully decline to answer based
5 upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to
6 the Constitution. I must follow my lawyer's advice in this matter.

7 Mr. Gooden. Do you believe fraudulent contributions from foreign sources to
8 political fundraising platforms can affect election results?

9 The Witness. On the advice of counsel, I must respectfully decline to answer based
10 upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to
11 the Constitution. I must follow my lawyer's advice in this matter.

12 ██████████: Did ActBlue test potential fraud prevention policy changes for their
13 affect on donations before implementing them?

14 The Witness. On the advice of counsel, I must respectfully decline to answer based
15 upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to
16 the Constitution. I must follow my lawyer's advice in this matter.

17 ██████████: How often does ActBlue weaken its fraud prevention standards?

18 The Witness. On the advice of counsel, I must respectfully decline to answer based
19 upon the attorney-client privilege and in reliance on my right under the Fifth Amendment to
20 the Constitution. I must follow my lawyer's advice in this matter.

21 ██████████: Mr. Donalds, any questions, sir?

22 Mr. Donalds. No.

23 ██████████: We can go off the record.

24 [Discussion off the record.]

25 ██████████: We can go back on the record at 10:16 a.m.

1 Mr. Hurwitz, I'm [REDACTED]. I'm with the House Judiciary Democrats. I'm
2 joined by my colleagues from the minority on House Oversight and House Admin. So we're
3 going to reintroduce ourselves to you.

4 Before I get started, I do want to put a few exhibits on the record, starting with
5 exhibit 3, which we had provided to you all during the break.

6 [Hurwitz Exhibit No. 3
7 was marked for identification.]

8 [REDACTED]. Exhibit 3 will be an executive order titled, "Investigation into
9 Unlawful 'Straw Donor' and Foreign Contributions in American Elections," dated April 24th
10 of 2025.

11 [Hurwitz Exhibit No. 4
12 was marked for identification.]

13 [REDACTED]. Exhibit 4 will be an Aljazeera article dated July 31st of 2024 titled,
14 "Republican PAC WinRed misleads US consumers into recurring donations."

15 [Hurwitz Exhibit No. 5
16 was marked for identification.]

17 [REDACTED]. Exhibit 5 will be an NBC News article from November 8th of 2025
18 titled, "Ghislaine Maxwell's prison emails show she is 'happier' at minimum-security Texas
19 facility."

20 [Hurwitz Exhibit No. 6
21 was marked for identification.]

22 [REDACTED]. Exhibit 6 will be a September 20th, 2025, Truth Social post from
23 President Donald Trump, where he directs Attorney General Pam Bondi to prosecute
24 political enemies.

25 [Hurwitz Exhibit No. 7

1 Constitution. I must follow my lawyer's advice in this matter.

2 Q So, again, just going back to no matter how unfair or presumptive the question
3 is, whether it be about ActBlue being so bad, it's stopping fraudulent donations, or about
4 ActBlue taking a, quote, unquote, more lenient approach at stopping fraud, no matter what
5 question's asked of you, no matter how unfair it is, you are going to answer in the exact
6 same way. Is that correct?

7 A On the advice of counsel, I must respectfully decline to answer based upon the
8 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
9 Constitution. I must follow my lawyer's advice in this matter.

10 Q So if I asked you, for example, about President Trump's friendship with Mr.
11 Jeffrey Epstein, including about an email where Mr. Epstein said the President -- that
12 President Trump -- and this is a quote -- "knew about the girls," end quote, you're going to
13 answer with the same statement your attorney advised you to make. Is that correct?

14 A On the advice of counsel, I must respectfully decline to answer based upon the
15 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
16 Constitution. I must follow my lawyer's advice in this matter.

17 Q What if I asked you about the girlfriend of FBI Director Kash Patel receiving a
18 security detail made up of elite FBI agents usually assigned to a SWAT team in the Nashville
19 FBI Field Office, presumably making the SWAT team agents that are working on the security
20 detail unable to respond to crises that develop, such as a mass shooting or terror attack, you
21 would answer in the exact same way. Is that correct?

22 A On the advice of counsel, I must respectfully decline to answer based upon the
23 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
24 Constitution. I must follow my lawyer's advice in this matter.

25 Q What if I asked you whether you were aware of evidence that WinRed, the

1 Republicans' fundraising platform, has received seven times more complaints than ActBlue,
2 and yet the chairs of these three committees are yet to write a single letter or issue a single
3 subpoena to WinRed or to demand its documents? You would still give the same answer.
4 Is that correct?

5 A On the advice of counsel, I must respectfully decline to answer based upon the
6 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
7 Constitution. I must follow my lawyer's advice in this matter.

8 Q Last question, I believe.

9 What if I asked you about your knowledge about WinRed utilizing a series of
10 pre-checked boxes to trick donors into making recurring contributions instead of one
11 donation; or WinRed having to issue over a hundred million dollars of refunds to customers
12 who caught the overcharge in the 2020 election, you'd still give the same answer? Is that
13 right?

14 A On the advice of counsel, I must respectfully decline to answer based upon the
15 attorney-client privilege and in reliance on my right under the Fifth Amendment to the
16 Constitution. I must follow my lawyer's advice in this matter.

17 Q Thank you. We don't have any additional questions for you, but we do -- we
18 would like to note several things for the record.

19 This congressional investigation of ActBlue is a clear backdoor effort, and it's to assist
20 DOJ's investigation of ActBlue, which was initiated at the direction of the President on
21 April 24th of 2025.

22 In this executive order, ActBlue is the only platform that's named. And despite the
23 majority's assertion that the committees are not conducting this investigation in support of
24 any criminal inquiry, the majority has not investigated any other platform, including
25 WinRed, the Republicans' fundraising platform that has preyed on senior citizens with

1 deceptive tactics.

2 Instead, the majority continues its targeted partisan investigation of ActBlue to try to
3 distract from the Epstein files and to distract the American public in general.

4 So far this Congress, the majority has failed to conduct any oversight of this
5 administration, and there are many issues worthy of our attention.

6 For example, the majority in our committee could investigate the extraordinary and
7 irregular transfer of Ms. Ghislaine Maxwell to a minimum security prison in an apparent
8 brazen violation of the Bureau of Prisons' regulations and policies that do not allow sex
9 offenders to be held in minimum security prisons.

10 DOJ and the Bureau of Prisons transferred Ms. Maxwell after an unprecedented and
11 unusual interview with her by Deputy Attorney General Todd Blanche.

12 It appears that Ms. Maxwell is receiving special treatment from the warden at the
13 facility, which our committees should be investigating.

14 Or maybe the majority should investigate the interim U.S. Attorney for the Eastern
15 District of Virginia who is an inexperienced prosecutor, yet still leading the prosecution of
16 James Comey.

17 Just this week, a Federal judge ordered her to turn over grand jury materials that she
18 used to obtain an indictment against Mr. Comey, and the court raised questions of whether
19 government misconduct might require dismissing the charges altogether.

20 It should be noted, since it's relevant here, that prior to seeking this indictment of
21 Mr. Comey, President Trump demanded on Truth Social that the Attorney General
22 prosecute his political rivals, quoting, all quotes, "Now!!!" end quote, with three
23 exclamation points, calling them "guilty as hell."

24 Just as the President is doing with ActBlue, he is also targeting Mr. Comey and other
25 political rivals, and this truly deserves oversight from our committees. But instead, we

1 continue this investigation into ActBlue without even pretending to investigate WinRed.

2 This is no different than President Trump demanding that DOJ investigate prominent
3 Democrats' ties to Mr. Epstein, but not scrutinize his own close relationship with Mr.
4 Epstein, which is apparent in the documents released -- recently released by my colleagues
5 on the House Oversight Committee Democrats.

6 And with that, I want to say thank you for being here. And we will go off the
7 record.

8 [Whereupon, at 10:14 a.m., the deposition was concluded.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date

Transcribed Interview Transcript Errata Form

Interviewee	Darrin Hurwitz
Date of Interview	11/19/25
Date of Review	11/21/25
Name of Reviewer	Tara N. Tighe, counsel for Mr. Hurwitz
Signature of Reviewer	Tara N. Tighe

Page	Line	Suggested Correction
3	3	senior advisor
9	8	a former attorney for Act Blue
9	12	by our attorney clients
14	13	effect on donations
17	3	ActBlue being so bad at stopping
17	4	more lenient approach to stopping
17	5	question is asked
18	12	caught the overcharges
19	6	majority in our committees

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COMMITTEE ON THE JUDICIARY
JOINT WITH THE
COMMITTEE ON HOUSE ADMINISTRATION
AND THE
COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

DEPOSITION OF: [REDACTED]

Tuesday, July 15, 2025

Washington, D.C.

1 The deposition in the above matter was held in room 2237, Rayburn House Office
2 Building, commencing at 10:02 a.m.

3 Present from the Committee on the Judiciary: Representatives Jordan, Biggs,
4 Raskin, Moskowitz, and Crockett.

5 Present from the Committee on House Administration: Representatives Steil,
6 Bice, Miller, and Morelle.

7 Present from the Committee on Oversight and Government Reform:
8 Representatives Jordan, Biggs, and Crockett.

1 Appearances:

2

3

4

5 For the COMMITTEE ON THE JUDICIARY:

6

7 [REDACTED], DEPUTY GENERAL COUNSEL

8 [REDACTED], PROFESSIONAL STAFF MEMBER

9 [REDACTED], PROFESSIONAL STAFF MEMBER

10 [REDACTED], DIGITAL DIRECTOR

11 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

12 [REDACTED], PROFESSIONAL STAFF MEMBER

13 [REDACTED], PROFESSIONAL STAFF MEMBER

14 [REDACTED], MINORITY CHIEF OVERSIGHT COUNSEL

15 [REDACTED], MINORITY SPECIAL COUNSEL FOR INVESTIGATIONS

16 AND SENIOR ADVISOR

17 [REDACTED], MINORITY GENERAL COUNSEL

18 [REDACTED] MINORITY CHIEF COUNSEL AND SENIOR ADVISOR

19 [REDACTED], MINORITY LEGAL INTERN

1 For the COMMITTEE ON HOUSE ADMINISTRATION:

2

3 [REDACTED], GENERAL COUNSEL

4 [REDACTED], PARLIAMENTARIAN

5 [REDACTED] MINORITY STAFF DIRECTOR

6 [REDACTED], MINORITY PROFESSIONAL STAFF

7 [REDACTED], MINORITY SENIOR COUNSEL - ELECTIONS

8 [REDACTED], MINORITY COUNSEL

9

10

11

12 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

13

14 [REDACTED], SENIOR ADVISOR TO CHAIRMAN COMER

15 [REDACTED], CHIEF OVERSIGHT COUNSEL

16 [REDACTED], COUNSEL

17 [REDACTED], MINORITY LEGAL INTERN

18 [REDACTED], MINORITY COUNSEL

19 [REDACTED], MINORITY COUNSEL

20 [REDACTED], MINORITY SENIOR COUNSEL

21 [REDACTED], MINORITY COUNSEL

22 [REDACTED], MINORITY CHIEF COUNSEL

23 [REDACTED], MINORITY DEPUTY CHIEF COUNSEL - OVERSIGHT

1 For [REDACTED]:

2

3 DANNY C. ONORATO, ESQ.

4 TARA N. TIGHE, ESQ.

5 Schertler, Onorato, Mead & Sears, LLP

6 555 13th Street NW, Suite 500 West

7 Washington, D.C. 20004

1 [REDACTED]: Good morning.

2 This is a deposition of [REDACTED], senior workflow specialist at ActBlue.

3 The Committee on House Administration, the Committee on the Judiciary, and the
4 Committee on Oversight and Government Reform are charged with upholding
5 fundamental American civil liberties protecting the integrity of American elections.

6 In light of allegations that online fundraising platforms that serve as conduits for
7 political donations have accepted fraudulent donations from domestic and foreign
8 sources, the committees are conducting oversight to inform potential legislative reforms.

9 To further the committees' oversight and legislative reforms, the chairmen
10 requested a deposition with [REDACTED]

11 On June 25th, 2025, the committees issued subpoenas for [REDACTED] to appear at a
12 deposition today, July 15th.

13 [REDACTED] Exhibit No. 1
14 was marked for identification.]

15 [REDACTED]: I've marked the June 25th, 2025, subpoenas as exhibit No. 1.

16 On July 8th, the committees noticed today's deposition. I'll mark the July 8th
17 notices as exhibit No. 2.

18 [REDACTED] Exhibit No. 2
19 was marked for identification.]

20 [REDACTED]: Would the witness please state your name for the record?

21 The Witness. [REDACTED]

22 [REDACTED]: And I understand that you're represented today by personal
23 counsel.

24 Could personal counsel please state your name for the record?

25 Mr. Onorato. Good morning. Danny Onorato.

1 Ms. Tighe. And Tara Tighe.

2 [REDACTED]: Thank you.

3 My name is [REDACTED], and I'm with Chairman Jordan's Judiciary staff.

4 I'll now have everyone else from the committees here in the room introduce
5 themselves as well.

6 Mr. Biggs. Andy Biggs, Arizona 5.

7 [REDACTED] - [REDACTED], counsel for Chairman Comer.

8 [REDACTED]: [REDACTED], general counsel for House Administration
9 Committee.

10 [REDACTED]: [REDACTED], with Ranking Member Raskin on House
11 Judiciary.

12 [REDACTED]: [REDACTED], counsel with the Committee on House
13 Administration Democrats.

14 [REDACTED]: [REDACTED], with Ranking Member Garcia for House
15 Oversight.

16 [REDACTED]: [REDACTED], Ranking Member Raskin with House Judiciary.

17 [REDACTED] - [REDACTED], chief counsel, Ranking Member Joe Morelle's staff.

18 [REDACTED]: [REDACTED], House Judiciary Committee Democratic staff.

19 [REDACTED] - [REDACTED], House Judiciary Committee Democratic staff.

20 [REDACTED]: [REDACTED], House Oversight Democratic staff.

21 [REDACTED] - [REDACTED], House Oversight Democratic staff.

22 [REDACTED] - [REDACTED], House Oversight Committee majority.

23 [REDACTED] - [REDACTED], House Admin majority.

24 Mrs. Bice. Congresswoman Stephanie Bice, House Administration.

25 [REDACTED]: [REDACTED], with Chairman Jordan's staff at House Judiciary

1 Committee.

2 [REDACTED]: [REDACTED], Chairman Jordan's staff, House Judiciary

3 Committee.

4 [REDACTED]: [REDACTED], Chairman Jordan's staff, House Judiciary.

5 [REDACTED]: [REDACTED], Chairman Jordan's staff, House Judiciary.

6 [REDACTED]: [REDACTED], Chairman Jordan's staff, House Judiciary.

7 [REDACTED]: [REDACTED], House Oversight minority.

8 [REDACTED]: [REDACTED], Oversight majority.

9 [REDACTED]: [REDACTED], with Ranking Member Raskin's staff.

10 [REDACTED]: [REDACTED], House Oversight Committee.

11 [REDACTED]: [REDACTED], House Oversight minority.

12 [REDACTED]: [REDACTED], House Oversight Democratic staff.

13 [REDACTED]: Thank you.

14 I'll now review the ground rules and guidelines that we will follow during today's
15 deposition.

16 The committees will conduct today's deposition in accordance with the House's
17 Regulations for the Use of Deposition Authority, which we have provided a copy to your
18 counsel.

19 Our questioning will proceed in rounds. The majority will ask questions first for 1
20 hour. Then the minority will have an opportunity to ask questions for an equal period of
21 time if they choose.

22 There will be two staff counsel per side asking the questions. To the extent
23 Members have questions for the witness, they will be propounded during their side's
24 respective rounds.

25 The clock will stop if the witness needs to confer with counsel, when counsel for

1 the witness is speaking, and when Members are speaking during the opposite side's
2 round.

3 We'll alternate back and forth until there are no more questions and the
4 deposition is over.

5 We ordinarily take a short break at the end of each hour, but if you would like to
6 take a break apart from that, please just let us know.

7 As you can see, there is an official court reporter taking down everything we say to
8 make a written record, so we ask that you give verbal responses to all questions.

9 Do you understand that?

10 The Witness. On the advice of counsel, I must respectfully decline to answer, in
11 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
12 and I must follow my lawyer's advice in this matter.

13 [REDACTED]. So the court reporter can take down a clear record, please try and
14 speak clearly so the court reporter can understand and so the people at the end of the
15 table can hear you.

16 It is important that we do not talk over one another or interrupt each other if we
17 can help it, and that goes for everybody present at today's deposition.

18 We want you to answer our questions in a complete and truthful manner. If you
19 do not understand one of our questions or need clarification about what we are seeking,
20 please let us know.

21 If you do not know the answer to a question or do not remember, please tell us
22 what you do know and remember. It is okay to tell us if you learned information from
23 someone else; just indicate how you came to know the information.

24 If there are things you do not know or cannot remember, just say so, and please
25 inform us who, to the best of your knowledge, might be able to provide a more complete

1 answer to the question.

2 By law, you are required to answer questions from Congress truthfully. Do you
3 understand that?

4 The Witness. On the advice of counsel, I must respectfully decline to answer, in
5 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
6 and I must follow my lawyer's advice in this matter.

7 [REDACTED]: This applies to questions posed by congressional staff in a
8 deposition. Do you understand this?

9 The Witness. On the advice of counsel, I must respectfully decline to answer, in
10 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
11 and I must follow my lawyer's advice in this matter.

12 [REDACTED]: Witnesses that knowingly provide false testimony could be subject
13 to criminal prosecution for perjury. This includes, for example, stating that you do not
14 recall or remember something when, in fact, you do.

15 Do you understand this?

16 The Witness. On the advice of counsel, I must respectfully decline to answer, in
17 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
18 and I must follow my lawyer's advice in this matter.

19 [REDACTED]: Furthermore, you cannot tell half-truths or exclude information
20 necessary to make statements accurate. You are required to provide all information
21 that would make your response truthful. A deliberate failure to disclose information can
22 constitute a false statement.

23 Do you understand this?

24 The Witness. On the advice of counsel, I must respectfully decline to answer, in
25 reliance on my right under the Fifth Amendment to the Constitution. I'm not a lawyer,

1 and I must follow my lawyer's advice in this matter.

2 [REDACTED]: The Federal Rules of Evidence, Criminal and Civil Procedure are not
3 applicable for today's deposition.

4 Under the House deposition regulations, a witness's attorney may not instruct a
5 witness to refuse to answer a question except to preserve a privilege. The House
6 recognizes constitutionally based privileges and not necessarily those privileges derived
7 from common law.

8 Finally, I will make note for the Members and staff here today that the content of
9 what we discuss is confidential under the House deposition regulations.

10 Under the rules, the chairmen and ranking minority members shall consult before
11 any release of the testimony transcripts, including portions thereof. This means it is a
12 violation of House and committee rules to disclose content of the deposition prior to its
13 official release.

14 For this reason, the marked exhibits that we will use today will remain with the
15 court reporter so that they can go in the official transcript, and any copy of those exhibits
16 will be returned to us when we wrap up.

17 Before we begin the first round of questions, we'll afford the minority an
18 opportunity to make any opening remarks.

19 [REDACTED]: We'll just say thank you for taking the time to be here today to
20 testify before our committees and also make you aware that this deposition is being
21 recorded.

22 Thanks.

23 The Witness. On the advice of counsel, I must respectfully decline to answer, in
24 reliance on my right under the Fifth Amendment to the Constitution. I am not a lawyer,
25 and I must follow my lawyer's advice in this matter.

1 ██████████: Mr. Onorato, do you have any opening remarks?

2 Mr. Onorato. Good morning.

3 My name is Danny Onorato. Tara Tighe and I represent ██████████.

4 When first contacted by your committees, ██████████, through counsel, consistently
5 expressed his intent to cooperate with this investigation.

6 However, on April 24th of 2025, President Trump issued a Presidential
7 memorandum directing the Attorney General of the United States to investigate
8 ██████████ employer, ActBlue, for the same issues being investigated by these
9 committees. President Trump directed the Attorney General to report the results of the
10 investigation within an expedited timeframe of 180 days.

11 In light of the pending DOJ investigation, we, as ██████████ lawyers, asked the
12 committees to postpone this deposition until after the parallel Department of Justice
13 inquiry was completed. The request for a modest adjournment was rejected by the
14 committees, while at the same time the committees pledged to work, quote,
15 "collaboratively" with the DOJ.

16 Given these developments, the committees' insistence on proceeding today leaves
17 ██████████ with no choice but to follow the advice of his lawyers and assert his Fifth
18 Amendment right under the United States Constitution.

19 In so doing, he follows in the footsteps of many other Americans that appear in
20 proceedings before Congress and elsewhere by invoking fundamental rights guaranteed
21 by the Constitution.

22 We want to emphasize that asserting the Fifth Amendment privilege does not
23 imply that ██████████ has engaged in any wrongdoing. In fact, to the contrary, as our
24 Supreme Court recognized more than a century ago, the Fifth Amendment is a, quote,
25 "safeguard" -- I'm sorry -- is a, quote, "protection to the innocent and a safeguard against

1 heedless, unfounded, or tyrannical prosecutions."

2 [REDACTED], therefore, will respectfully decline to answer any questions that might
3 be posed to him by this committee.

4 Thank you.

5 [REDACTED]: Thank you, Mr. Onorato.

6 The court reporter will now swear the witness in.

7 The Reporter. Do you solemnly declare and affirm under the penalty of perjury
8 that the testimony you are about to give will be the truth, the whole truth, and nothing
9 but the truth?

10 The Witness. I do.

11 [REDACTED]: The clock now reads 10:11 a.m. We'll start the first round of
12 questions.

13 EXAMINATION

14 BY [REDACTED]:

15 Q [REDACTED], when did you start working at ActBlue?

16 A On the advice of counsel, I must respectfully decline to answer, in reliance
17 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
18 must follow my lawyer's advice in this matter.

19 Q During your tenure at ActBlue, what positions have you held?

20 A On the advice of counsel, I must respectfully decline to answer, in reliance
21 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
22 must follow my lawyer's advice in this matter.

23 Q Is it accurate to say that you supervised the fraud-prevention team?

24 A On the advice of counsel, I must respectfully decline to answer, in reliance
25 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I

1 must follow my lawyer's advice in this matter.

2 Q How many individuals work on the fraud-prevention team at ActBlue?

3 A On the advice of counsel, I must respectfully decline to answer, in reliance
4 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
5 must follow my lawyer's advice in this matter.

6 Q [REDACTED], why is ActBlue so bad at stopping fraudulent donations?

7 A On the advice of counsel, I must respectfully decline to answer, in reliance
8 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
9 must follow my lawyer's advice in this matter.

10 Q Why does ActBlue review so many fewer transactions for fraud than an
11 ordinary website selling physical goods?

12 A On the advice of counsel, I must respectfully decline to answer, in reliance
13 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
14 must follow my lawyer's advice in this matter.

15 Q Does ActBlue willingly turn a blind eye to fraud so that campaigns can
16 increase fundraising on ActBlue?

17 A On the advice of counsel, I must respectfully decline to answer, in reliance
18 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
19 must follow my lawyer's advice in this matter.

20 Q Have you ever instructed individuals at ActBlue to turn a blind eye to fraud?

21 A On the advice of counsel, I must respectfully decline to answer, in reliance
22 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
23 must follow my lawyer's advice in this matter.

24 Q Have you ever been part of a conspiracy to launder foreign money into
25 fraudulent donations for campaigns using ActBlue?

1 A On the advice of counsel, I must respectfully decline to answer, in reliance
2 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
3 must follow my lawyer's advice in this matter.

4 Q Does ActBlue instruct donors or campaigns about how they can evade
5 ActBlue's fraud-prevention processes?

6 A On the advice of counsel, I must respectfully decline to answer, in reliance
7 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
8 must follow my lawyer's advice in this matter.

9 Q Is Sift capable of detecting fraudulent transactions on ActBlue?

10 A On the advice of counsel, I must respectfully decline to answer, in reliance
11 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
12 must follow my lawyer's advice in this matter.

13 Q In 2024, according to documents that the committees have received, in your
14 goals you included allowing more fraud on ActBlue. Why did you do that?

15 A On the advice of counsel, I must respectfully decline to answer, in reliance
16 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
17 must follow my lawyer's advice in this matter.

18 Q According to documents produced to the committee, ActBlue took a quote,
19 "more lenient approach," end quote, to fraud in 2024 by increasing Sift score thresholds.

20 Why did ActBlue take a more lenient approach to fraud in 2024?

21 A On the advice of counsel, I must respectfully decline to answer, in reliance
22 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
23 must follow my lawyer's advice in this matter.

24 Q Did ActBlue take a more lenient approach to fraud in 2024 to increase
25 donations to campaigns?

1 A On the advice of counsel, I must respectfully decline to answer, in reliance
2 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
3 must follow my lawyer's advice in this matter.

4 Q Did ActBlue make a concerted effort to allow more fraud on the platform in
5 2024?

6 A On the advice of counsel, I must respectfully decline to answer, in reliance
7 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
8 must follow my lawyer's advice in this matter.

9 Q Have ActBlue executives ever instructed you to allow more fraud on the
10 platform or weaken ActBlue's fraud-prevention defenses?

11 A On the advice of counsel, I must respectfully decline to answer, in reliance
12 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
13 must follow my lawyer's advice in this matter.

14 Q In 2024, did ActBlue ban gift card donations, prepaid donations, and foreign
15 donations and newly require CVVs because it was worried about legal scrutiny of fraud
16 committed using these mechanisms?

17 A On the advice of counsel, I must respectfully decline to answer, in reliance
18 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
19 must follow my lawyer's advice in this matter.

20 Q Why did ActBlue exempt recurring donations from the CVV requirement?

21 A On the advice of counsel, I must respectfully decline to answer, in reliance
22 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
23 must follow my lawyer's advice in this matter.

24 Q Does ActBlue only make fraud-prevention policy changes that positively
25 affect the number of donations on its platform?

1 A On the advice of counsel, I must respectfully decline to answer, in reliance
2 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
3 must follow my lawyer's advice in this matter.

4 Q Does ActBlue not institute fraud-prevention policy changes if they would
5 negatively affect the number of donations on the platform?

6 A On the advice of counsel, I must respectfully decline to answer, in reliance
7 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
8 must follow my lawyer's advice in this matter.

9 Q How often does ActBlue weaken its fraud-prevention standards?

10 A On the advice of counsel, I must respectfully decline to answer, in reliance
11 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
12 must follow my lawyer's advice in this matter.

13 Q Does ActBlue deliberately have weaker fraud-prevention defenses for
14 donations made using third-party payment apps like PayPal?

15 A On the advice of counsel, I must respectfully decline to answer, in reliance
16 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
17 must follow my lawyer's advice in this matter.

18 Q How many times has ActBlue determined that campaigns have used
19 ActBlue's Entry Mode to directly input fraudulent donations to themselves?

20 A On the advice of counsel, I must respectfully decline to answer, in reliance
21 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
22 must follow my lawyer's advice in this matter.

23 ██████████: ██████████, can we go off the record for a second?

24 ██████████: Yep. We can go off the record.

25 [Discussion off the record.]

1 [REDACTED]: We'll go back on the record.

2 BY [REDACTED]:

3 Q How many times has ActBlue determined that bad actors have coordinated a
4 big fraud attack where each individual donation fell below the Sift threshold?

5 A On the advice of counsel, I must respectfully decline to answer, in reliance
6 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
7 must follow my lawyer's advice in this matter.

8 Q How many times have bad actors hacked ActBlue Express Accounts and then
9 made fraudulent donations on ActBlue?

10 A On the advice of counsel, I must respectfully decline to answer, in reliance
11 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
12 must follow my lawyer's advice in this matter.

13 Q Why doesn't ActBlue cooperate with internal bank investigations of
14 potentially fraudulent transactions?

15 A On the advice of counsel, I must respectfully decline to answer, in reliance
16 on my right under the Fifth Amendment to the Constitution. I am not a lawyer, and I
17 must follow my lawyer's advice in this matter.

18 Q Do you have any information regarding why ActBlue placed Zane Ahmad on
19 leave because he chose to blow the whistle on pervasive fraud and misconduct at
20 ActBlue?

21 A On the advice of counsel, I must respectfully decline to answer, in reliance
22 on my right under the Fifth Amendment to the Constitution. I'm not a lawyer, and I
23 must rely on my lawyer's advice in this matter.

24 Q Do you have any information regarding why seven senior staff resigned in
25 February of 2025 from ActBlue?

1 DOJ's investigation of ActBlue, which was initiated at the direction of President Donald
2 Trump's April 24th, 2025, executive order.

3 Just a couple weeks after President Trump's executive order, congressional
4 Republicans sent a letter to Attorney General Pam Bondi stating that they looked forward
5 to -- and this is a quote -- "working collaboratively," end quote, with DOJ in investigating
6 ActBlue.

7 With this blatant coordination between DOJ and Congress to investigate ActBlue
8 at the demand of President Trump, it is not surprising that our witness here is invoking
9 their Fifth Amendment privilege.

10 ActBlue had been voluntarily cooperating with our committees until President
11 Trump directed DOJ to investigate them in an executive order.

12 In reviewing ActBlue's productions and responses to congressional requests, it is
13 clear that ActBlue is not hiding any relevant information. In fact, ActBlue has produced
14 nearly 3,500 pages of documents in response to the committees' inquiry, with minimal
15 redactions.

16 If our committees are truly concerned over campaign fundraising issues and
17 protecting Americans from fraud, then we would encourage them to expand this
18 investigation to include WinRed, the Republican fundraising platform that has preyed on
19 senior citizens with deceptive tactics.

20 Further, if the majority truly cared about foreign interference in our elections, as it
21 has claimed in its interim report, they would join committee Democrats in investigating
22 other issues, such as President Trump pressuring the Qatari royal family for a \$400 million
23 ultra-luxury jetliner.

24 And if they cared about corruption, they would join the minority in investigating
25 President Trump's retribution against law firms and rewarding wealthy donors with

1 pardons. And that's just to name a few examples.

2 Instead, the majority has failed to conduct any oversight of this administration or
3 call a single administration witness to any transcribed interview, deposition, or hearing.

4 So, again, thank you for being here.

5 And, with that, we will go off the record.

6 [REDACTED]. Thank you.

7 [Whereupon, at 10:32 a.m., the deposition was concluded.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

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COMMITTEE ON THE JUDICIARY,
JOINT WITH THE
COMMITTEE ON HOUSE ADMINISTRATION
AND THE
COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

DEPOSITION OF: ZAIN AHMAD

Friday, December 5, 2025

Washington, D.C.

The deposition in the above matter was held in room 2237, Rayburn House Office
Building, commencing at 10:00 a.m.

1 Appearances:

2

3

4

5 For the COMMITTEE ON THE JUDICIARY:

6

7 [REDACTED], DEPUTY GENERAL COUNSEL

8 [REDACTED], PROFESSIONAL STAFF MEMBER

9 [REDACTED], DIGITAL DIRECTOR

10 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

11 [REDACTED], PROFESSIONAL STAFF MEMBER

12 [REDACTED], MINORITY SPECIAL COUNSEL

13 FOR INVESTIGATIONS AND SENIOR ADVISOR

14 [REDACTED], MINORITY FELLOW

15 [REDACTED], MINORITY LEGAL INTERN

16 [REDACTED], MINORITY INTERN

17

18 For the COMMITTEE ON HOUSE ADMINISTRATION:

19 [REDACTED], COUNSEL

20 [REDACTED], MINORITY CHIEF COUNSEL

21 [REDACTED], MINORITY COUNSEL

22

1 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

2

3 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

4 [REDACTED], SENIOR COUNSEL

5 [REDACTED], COUNSEL

6 [REDACTED], MINORITY LEGAL INTERN

7 [REDACTED], MINORITY DEPUTY CHIEF COUNSEL

8 [REDACTED], MINORITY COUNSEL

9

10 ALSO PRESENT:

11

12 [REDACTED], LEGISLATIVE ASSISTANT TO REPRESENTATIVE BIGGS

13

14

15 For ZAIN AHMAD:

16

17 DANNY C. ONORATO, ESQ.

18 TARA N. TIGHE, ESQ.

19 Schertler, Onorato, Mead & Sears, LLP

20 555 13th Street NW, Suite 500 West

21 Washington, D.C. 20004

22

23

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25

1 [REDACTED] Good morning. This is a deposition of Mr. Zain Ahmad, former legal
2 counsel at ActBlue. The Committee on House Administration, the Committee on the
3 Judiciary, and the Committee on Oversight and Government Reform are charged with
4 upholding fundamental American civil liberties and protecting the integrity of American
5 elections.

6 In light of allegations that online fundraising platforms that serve as conduits for
7 political donations have accepted fraudulent donations from domestic and foreign sources,
8 the committees are conducting oversight to inform potential legislative reforms.

9 To further the committee's oversight and legislative reforms, the chairmen have
10 requested a deposition with Mr. Ahmad. On September 4, 2025, the committees issued
11 subpoenas for Mr. Ahmad to appear at a deposition on October 15th. After conferring
12 with counsel, the committees agreed to move the deposition to today, December 5th. I've
13 marked the September 4, 2025, subpoena as exhibit number 1.

14 [Ahmad Exhibit No. 1
15 was marked for identification.]

16 [REDACTED]: On November 28, the committees noticed today's deposition. I've
17 marked the November 28th notice as exhibit number 2.

18 [Ahmad Exhibit No. 2
19 was marked for identification.]

20 [REDACTED]: Would the witness please state your name for the record.

21 Mr. Ahmad. Zain Ahmad.

22 [REDACTED]: Could counsel please state your name for the record.

23 Mr. Onorato. Danny Onorato.

24 Ms. Tighe. Good morning. Tara Tighe.

25 [REDACTED]: My name is [REDACTED], and I am with Chairman Jordan's staff.

1 I'll now have everyone else from the committees who are here in the room introduce
2 themselves as well.

3 [REDACTED] :- [REDACTED] with Chairman Jordan's staff.

4 [REDACTED] :- [REDACTED], Ranking Member Garcia's staff.

5 [REDACTED] :- [REDACTED] with Ranking Member Raskin's staff.

6 [REDACTED] :- [REDACTED] with Ranking Member Morelle's staff.

7 [REDACTED] :- [REDACTED], Ranking Member Garcia's staff.

8 [REDACTED] :- [REDACTED], Ranking Member Garcia's staff.

9 [REDACTED] :- [REDACTED], Ranking Member Morelle's staff.

10 [REDACTED] :- [REDACTED], Ranking Member Raskin's staff.

11 [REDACTED] :- [REDACTED], Ranking Member Raskin's staff.

12 [REDACTED] :- [REDACTED], Ranking Member Raskin's staff.

13 [REDACTED] :- [REDACTED], Chairman Jordan's staff.

14 [REDACTED] :- [REDACTED], Chairman Jordan.

15 [REDACTED] :- [REDACTED] with the Oversight Committee, majority.

16 [REDACTED] :- [REDACTED], Chairman Comer's staff.

17 [REDACTED] :- [REDACTED], Chairman Steil's staff.

18 [REDACTED] :- [REDACTED], Chairman Comer's staff.

19 [REDACTED] :- [REDACTED], Chairman Jordan's staff.

20 [REDACTED] :- Thank you. I'll now review the ground rules and guidelines that we
21 will follow during today's deposition. The committees will conduct today's deposition in
22 accordance with the House's regulations for the use of deposition authority. Our
23 questioning will proceed in rounds. The majority will ask questions first for one hour, and
24 then the minority will have an opportunity to ask questions for an equal period of time if
25 they choose. There will be two staff counsel per side asking the questions. To the extent

1 members have questions for the witness, they will be propounded during their side's
2 respective rounds. The clock will stop if the witness needs to confer with counsel, when
3 counsel for the witness is speaking, and when members are speaking during the opposite
4 side's round. We'll alternate back and forth until there are no more questions and the
5 deposition is over.

6 We ordinarily take a short break at the end of each hour, but if you would like to
7 take a break apart from that, please just let us know.

8 As you can see, there is an official court reporter taking down everything we say to
9 make a written record, so we ask that you give verbal responses to all questions. Do you
10 understand this?

11 Mr. Ahmad. I understand.

12 [REDACTED]: So the court reporter can take down a clear record, please try and
13 speak clearly so they can understand and so the people at the end of the table can hear you.
14 It's important that we do not talk over one another or interrupt each other if we can help it,
15 and that goes for everybody present at today's deposition.

16 We want you to answer our questions in a complete and truthful manner. If you do
17 not understand one of our questions or need clarification about what we are seeking, please
18 just let us know. If you do not know the answer to a question or do not remember, please
19 tell us what you do know and remember. It is okay to tell us if you learned information
20 from someone else. Just indicate how you came to know that information. If there are
21 things you do not know or cannot remember, just say so, and please inform us who, to the
22 best of your knowledge, might be able to provide a more complete answer to the question.
23 By law, you are required to answer questions from Congress truthfully. Do you understand
24 that?

25 Mr. Ahmad. I understand.

1 [REDACTED]: This also applies to questions posed by congressional staff in a
2 deposition. Do you understand this?

3 Mr. Ahmad: I understand.

4 [REDACTED]: Witnesses that knowingly provide false testimony could be subject to
5 criminal prosecution for perjury. This includes, for example, stating that you do not recall
6 or remember something when, in fact, you do. Do you understand this?

7 Mr. Ahmad: I understand.

8 [REDACTED]: Furthermore, you cannot tell half-truths or exclude information
9 necessary to make statements accurate. You are required to provide all information that
10 would make your response truthful. A deliberate failure to disclose information can
11 constitute a false statement. Do you understand this?

12 Mr. Ahmad: I understand.

13 [REDACTED]: Is there any reason you are unable to provide truthful answers to
14 today's questions?

15 Mr. Ahmad: On the advice of counsel, I must respectfully decline to answer based
16 upon the attorney/client privilege and in reliance on my right under the Fifth Amendment to
17 the Constitution. I must follow my lawyer's advice in this matter.

18 [REDACTED]: The Federal rules of evidence, criminal, and civil procedure are not
19 applicable for today's deposition. Under the House deposition regulation, a witness's
20 attorney may not instruct a witness to refuse to answer a question except to preserve a
21 privilege. The House recognizes constitutionally based privileges and not necessarily those
22 privileges derived from common law.

23 Finally, I will make note for those in attendance today that the content of what we
24 discuss here is confidential under the House deposition regulations. Under the rules, the
25 chairman and ranking minority members shall consult before any release of testimony,

1 transcripts, including portions thereof. This means it is a violation of House and
2 Committee rules to disclose content of the deposition prior to its official release. For this
3 reason, the marked exhibits that we will use today will remain with the court reporter so
4 that they can go in the official transcript, and any copies of those exhibits will be returned to
5 us when we wrap up.

6 Before we begin the first round of questions, we'll afford the minority, the witness,
7 and counsel for the witness the opportunity to offer any preliminary remarks.

8 [REDACTED]: I just want to say thank you for being here. I'm not sure you're
9 aware that this deposition is being recorded, so I just wanted to make you aware of the
10 cameras in the back of the room.

11 Mr. Ahmad. Thank you.

12 [REDACTED]: Mr. Onorato.

13 Mr. Onorato. Thank you. Good morning. My name is Danny Onorato. My
14 colleague Tara Tighe and I represent Zain Ahmad in this matter in his role as an attorney for
15 ActBlue. When the committees first contacted us back in May of 2025, we promptly
16 requested that the committees confer with ActBlue to address two critical matters. First,
17 whether ActBlue would authorize a waiver of the attorney/client privilege, and second, the
18 scope of any potential testimony by our attorney clients. The committees have not
19 engaged with ActBlue on these issues and this failure has created the situation we face
20 today.

21 Mr. Ahmad is a licensed attorney bound by the rules of professional responsibility
22 and ethics. They impose mandatory duties to preserve the attorney/client privilege and
23 protect client confidences. These obligations do not cease when an attorney leaves a
24 client's employment. They continue indefinitely. Legal precedent and ethical rules are
25 abundantly clear. Absent a waiver of the attorney/client privilege, an attorney must take

1 all necessary measures to protect client confidences even when responding to questions
2 from Congress.

3 If an attorney fails to assert a privilege, he or she may inadvertently waive the
4 privilege over any information provided, a waiver that cannot be undone. Moreover, an
5 attorney who discloses privileged information without client authorization faces severe
6 professional consequences, including the potential suspension or disbarment. Mr. Ahmad
7 cannot and will not jeopardize his law license by breaching his ethical duties and obligations.

8 Given the committee's failure to work with ActBlue to obtain an appropriate waiver
9 or to define the scope of permissible testimony, Mr. Ahmad has no alternative but to
10 protect all attorney/client privileged information. Thus, following the advice of counsel, he
11 will assert the attorney/client privilege as well as his Fifth Amendment privilege against
12 self-incrimination. We want to emphasize unequivocally that asserting the Fifth
13 Amendment does not imply any wrongdoing. To the contrary, as the Supreme Court
14 recognized more than a century ago, the Fifth Amendment is, quote, "a protection to the
15 innocent," and a quote, "safeguard against heedless, unfounded, or tyrannical
16 prosecutions." That's *Quinn versus United States*, 349 U.S. 155 1955. Simply put, Mr.
17 Ahmad's assertions of privilege are mandated by these circumstances. Thank you.

18 [REDACTED]: Thank you. The court reporter will now sear the witness in.

19 [Witness sworn.]

20 [REDACTED]: Thank you. The clock now reads 10:08 a.m. We'll start the first
21 hour of questioning.

22 EXAMINATION

23 BY [REDACTED]:

24 Q What were your job responsibilities at ActBlue?

25 A On the advice of counsel, I must respectfully decline to answer based upon the

1 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
2 Constitution. I must follow my lawyer's advice in this matter.

3 Q Did members of ActBlue's legal and compliance teams leave ActBlue after the
4 2024 election because of the platform's inability to prevent fraud during previous election
5 cycles?

6 A On the advice of counsel, I must respectfully decline to answer based upon the
7 attorney/client privilege, and in reliance on my right under the Fifth Amendment to the
8 Constitution. I must follow my lawyer's advice in this matter.

9 Q After the entire legal and compliance team quit, was fired, or went on leave,
10 was ActBlue able to carry out its legal obligations and deter bad actors?

11 A On the advice of counsel, I must respectfully decline to answer based upon the
12 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
13 Constitution. I must follow my lawyer's advice in this matter.

14 Q Have you ever witnessed misconduct related to fraud prevention at ActBlue?

15 A On the advice of counsel, I must respectfully decline to answer based upon the
16 attorney client privilege and in reliance on my right under the Fifth Amendment to the
17 Constitution. I must follow my lawyer's advice in this matter.

18 Q Were you retaliated against for blowing the whistle on misconduct related on
19 fraud prevention at ActBlue?

20 A On the advice of counsel, I must respectfully decline to answer based upon the
21 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
22 Constitution. I must follow my lawyer's advice in this matter.

23 Q Around the time you went on leave at ActBlue, there were a wave of
24 resignations among senior ActBlue staff. Were those events related?

25 A On the advice of counsel, I must respectfully decline to answer based upon the

1 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
2 Constitution. I must follow my lawyer's advice on the matter.

3 Q Did you ever willingly turn a blind eye to fraud so that any campaign could
4 increase its fundraising on ActBlue?

5 A On the advice of counsel, I must respectfully decline to answer based upon the
6 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
7 Constitution. I must follow my lawyer's advice in this matter.

8 Q As a follow-up to that previous question, were you ever instructed by ActBlue
9 staff to do so?

10 A On the advice of counsel, I must respectfully decline to answer based upon the
11 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
12 Constitution. I must follow my lawyer's advice in this matter.

13 Q Internal ActBlue documents stated that ActBlue took a, quote, "more lenient
14 approach," end quote, to fraud in 2024. Can you tell us why ActBlue made that change?

15 A On the advice of counsel, I must respectfully decline to answer based upon the
16 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
17 Constitution. I must follow my lawyer's advice on the matter -- on this matter.

18 Q Did ActBlue ban CVVs, gift card donations, prepaid donations, and foreign
19 donations because it was worried about legal scrutiny of fraud committed using these
20 mechanisms?

21 A On the advice of counsel, I must respectfully decline to answer based upon the
22 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
23 Constitution. I must follow my lawyer's advice in this matter.

24 Q Did ActBlue make a concerted effort to allow more fraud on the platform in
25 2024?

1 A On the advice of counsel, I must respectfully decline to answer based upon the
2 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
3 Constitution. I must follow my lawyer's advice in this matter.

4 Q Does ActBlue test potential fraud prevention policy changes for their effect on
5 donations before implementing them?

6 A On the advice of counsel, I must respectfully decline to answer based upon the
7 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
8 Constitution. I must follow my lawyer's advice in this matter.

9 Q Did campaigns ever use entry mode to directly input fraudulent donations to
10 themselves?

11 A On the advice of counsel, I must respectfully decline to answer based upon the
12 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
13 Constitution. I must follow my lawyer's advice in this matter.

14 Q Did you ever witness coordinated big fraud attacks where each individual
15 donation fell below the sift threshold?

16 A On the advice of counsel, I must respectfully decline to answer based upon the
17 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
18 Constitution. I must follow my lawyer's advice in this matter.

19 Q Have ActBlue express accounts ever been hacked in order to make fraudulent
20 donations?

21 A On the advice of counsel, I must respectfully decline to answer based upon the
22 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
23 Constitution. I must follow my lawyer's advice in this matter.

24 Q Is the practice of smurfing in which bad actors make fraudulent donations using
25 the personal information of real people pervasive at ActBlue?

1 [REDACTED]. Exhibit 5 is going to be a New Republic article titled, "Trump Told
2 CBS What to Cut From Its 60 Minutes Interview and They Listened." This article is dated
3 November 3rd of 2025.

4 [Ahmad Exhibit No. 5
5 was marked for identification.]

6 [REDACTED]. Exhibit 6 is going to be a September 20th, 2025, Truth Social post by
7 Donald Trump where he directs Attorney General Pam Bondi to investigate his political
8 enemies.

9 [Ahmad Exhibit No. 6
10 was marked for identification.]

11 [REDACTED]. And exhibit 7 is going to be a November 11th, 2025 letter from your
12 attorney, Mr. Danny Onorato, to the committees of jurisdiction here, the House Judiciary
13 Committee, the House Committee on Oversight and Government Reform, as well as the
14 Committee on House Administration where he discusses potential issues of attorney/client
15 privilege prior to these depositions.

16 Mr. Ahmad, you've chosen to follow your counsel's advice and claim attorney/client
17 privilege as well as assert your Fifth Amendment privilege, the latter of which is your right
18 under our Constitution. In doing so, you are refusing to answer any question asked of you
19 during this deposition it appears.

20 It should be said that Mr. Ahmad previously served in the General Counsel's Office as
21 an attorney for ActBlue, which supports your assertion of attorney/client privilege, and this
22 assertion is no surprise to staff. In a letter dated November 11, 2025, which I just
23 discussed is the exhibit we entered in, attorneys representing you asked the majority to
24 work with ActBlue to obtain appropriate waivers of privilege and to define the scope of any
25 perspective testimony that you would give here today. This was raised again during the

1 opening statement that we heard from your attorney.

2 It does not appear, however, that this committee has attained those waivers, or
3 define the scope of your perspective testimony here.

4 Q So I want to start by some questions that the majority asked you during their
5 hour. I believe one of the questions discussed retaliation against you for blowing the
6 whistle on fraud at ActBlue. Do you believe the majority is misrepresenting an internal
7 labor dispute at ActBlue to validate their wild conspiracy theory about alleged fraud on the
8 ActBlue platform?

9 A On the advice of counsel, I must respectfully decline to answer based upon the
10 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
11 Constitution. I must follow my lawyer's advice in this matter.

12 Q Are you aware of President Trump's extortion of companies like Disney, Meta,
13 YouTube, and Paramount where he slaps them with frivolous lawsuits, or holds their merger
14 plans hostage at the FCC in exchange for tens of millions of dollars in payments that he then
15 funnels to a vanity ballroom project at the White House in his own presidential foundation?
16 Are you aware of that?

17 A On the advice of counsel, I must respectfully decline to answer based upon the
18 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
19 Constitution. I must follow my lawyer's advice in this matter.

20 Q Are you aware of President Trump's decision to pardon a Honduran drug lord
21 who was convicted by an American jury for coordinating one of the largest and most violent
22 drug traffic conspiracies in the world and who was sentenced by a Federal judge to 45 years
23 in prison while President Trump simultaneously shut down the DOJ organized crime and
24 drug enforcement task force and diverted thousands of agents from the Drug Enforcement
25 Agency to street level immigration enforcement? Are you aware of that as well?

1 A On the advice of counsel, I must respectfully decline to answer based upon the
2 attorney/client privilege and in reliance on my right under the Fifth Amendment to the
3 Constitution. I must follow my lawyer's advice in this matter.

4 [REDACTED]. Thank you, Mr. Ahmad. We don't have any additional questions.

5 However, we do have several notes for the record. This Congressional investigation
6 of ActBlue is a clear back-door effort to assist the DOJ's investigation of ActBlue which was
7 initiated at the direction of President Donald Trump on April 24th of 2025. In this
8 executive order, ActBlue is the only platform that's named, and despite the majority's
9 assertion that this -- that the committees are not conducting this investigation in support of
10 any criminal inquiry, the majority has not investigated any other platform, including
11 WinRed, the Republican fundraising platform that has preyed on senior citizens with
12 deceptive tactics.

13 Instead, the majority continues its targeted partisan investigation of ActBlue to try to
14 distract from the rising inflation that's running rampant in our country, and the damning
15 content of the Epstein files. Instead of spending time chasing fake allegations of fraud on
16 ActBlue's platform, our committee could be investigating many other issues, and I'll name a
17 few of those that we could be doing. We could be talking about how President Trump
18 appears to be exercising direct control over editorial decisions of one of the very companies
19 that settled one of his meritless lawsuits for \$36 million, demanding CBS edit out, among
20 other damning exchanges, a question about his decision to pardon a crypto billionaire
21 whose platform helped finance terrorists, oligarchs, and drug traffickers, but who also struck
22 a \$2 billion deal with the Trump family's own crypto venture. This egregious violation of
23 the first amendment is squarely within House Judiciary's oversight jurisdiction, and it
24 demands our attention.

25 Or maybe the majority should investigate the President's appointment of his

1 personal lawyers to fill U.S. attorney positions around the country, including Ms. Lindsey
2 Halligan who served as acting U.S. attorney for the eastern district of Virginia until a Federal
3 judge ruled her appointment was illegal and ordered the dismissal of a baseless case she
4 brought against Ms. Letitia James and Mr. James Comey in which she likely committed
5 prosecutorial misconduct due to her glaring inexperience on the job. It should be noted
6 that prior to seeking these indictments, President Trump demanded on Truth Social that the
7 attorney general prosecute his political rivals, and I say in all quotes now with three
8 exclamation points after the now, calling them, in quotes, guilty as hell, end quote.

9 Just as the President is doing with ActBlue, he's also targeting Mr. Comey, Ms. James,
10 and other political rivals, and this truly deserves oversight from our committees, but instead,
11 we continue this investigation into ActBlue without even pretending to investigate WinRed,
12 a platform of fraud on Americans is rampant and well-documented. This is no different
13 than President Trump demanding the DOJ investigate prominent Democrats ties to the
14 Epstein files, but not scrutinize his own relationship with Mr. Epstein, which is apparent in
15 the documents released by my colleagues on the House Oversight Democrats.

16 With that, I want to say thank you for being here and we'll go off the record.

17 [Whereupon, at 10:23 a.m., the deposition was concluded.]

1 Certificate of Deponent/Interviewee

2

3

4 I have read the foregoing ____ pages, which contain the correct transcript of the answers
5 made by me to the questions therein recorded.

6

7

8

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Witness Name

11

12

13

14

Date

15

Transcribed Interview Transcript Errata Form

Interviewee	Zain Ahmad
Date of Interview	12/5/25
Date of Review	12/10/25
Name of Reviewer	Tara N. Tighe, counsel for Mr. Ahmad
Signature of Reviewer	Tara N. Tighe

Page	Line	Suggested Correction
4	9	"committee's" should be "committees"
14	25	"perspective" should be "prospective"
15	3	"define" should be "defined"
15	3	"perspective" should be "prospective"
17	12	"a platform of fraud" should be "a platform where fraud"
10	18	"related on" should be "related to"