Congress of the United States

Washington, DC 20515

June 25, 2025

[redacted]
Senior Workflow Specialist
ActBlue
c/o Danny Onorato
Schertler Onorato Mead & Sears
555 13th Street, NW
Suite 500 West
Washington, DC 20004

Dear [redacted]:

The Committee on House Administration, the Committee on the Judiciary, and the Committee on Oversight and Government Reform are charged with upholding fundamental American civil liberties and protecting the integrity of American elections. In light of allegations that online fundraising platforms that serve as conduits for political donations have accepted fraudulent donations from domestic and foreign sources,[1] the Committees are conducting oversight to inform potential legislative reforms.[2] To further our oversight and legislative reforms, on April 2, 2025, the Committees first requested your appearance at a transcribed interview.[3] To date, you have failed to comply with the Committees' request. Therefore, the Committee on House Administration must resort to compulsory process to obtain your testimony.

Following our initial letter, on April 14, Danny Onorato, your attorney, contacted the Judiciary Committee to inform us that you had retained him to represent you in this matter.[4] On April 21, Mr. Onorato indicated that you had agreed to appear for a voluntary transcribed

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[1] *See* Miranda Devine, *Potential ActBlue criminal charges over possible fraud donations once again reveal the Dems' fraud campaign*, N.Y. POST (Sept. 19, 2024); Josh Christenson, *Treasury finds hundreds of transactions linked to fundraising platform ActBlue flagged by banks: GOP memo*, N.Y. POST (Oct. 29, 2024); Breanne Deppisch, *Democrat platform ActBlue subpoenaed by House committee amid concerns foreign donors exploited security flaws*, FOX NEWS (Oct. 31, 2024).

[2] *See* Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., to Ms. Regina Wallace-Jones, Chief Executive Officer, ActBlue (Oct. 28, 2024); Letter from Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Ms. Regina Wallace-Jones, Chief Executive Officer, ActBlue (Dec. 9, 2024); Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Ms. Regina Wallace-Jones, Chief Executive Officer, ActBlue (Apr. 2, 2025).

[3] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Ms. Regina Wallace-Jones, Chief Executive Officer, ActBlue (Apr. 2, 2025).

[4] Email from Counsel to Committee Staff, H. Comm. on the Judiciary (Apr. 14, 2025) (on file with the Comms.).

interview and began the process of scheduling your appearance for late May.[5] However, on May 7—in a call where the Committees planned to finalize a date for your appearance—Mr. Onorato changed course and notified the Committees that you would not appear in a timely manner for a voluntary transcribed interview in light of a reported executive branch investigation into "the unlawful use of online fundraising platforms to make 'straw' or 'dummy' contributions or foreign contributions to political candidates and committees[.]"[6] Specifically, Mr. Onorato stated that he would advise you not to appear before the Committees until you had "more information" about the reported "parallel investigation being conducted by the Department of Justice."[7]

On May 22, the Committees reiterated our request for your testimony.[8] On May 29, Mr. Onorato responded and once again asked the Committees to "withdraw [our] requests for transcribed interviews until the Department of Justice completes its investigation or clarifies its position with respect to our clients."[9] On June 9, counsel for ActBlue separately wrote to the Committees, raising additional objections.[10]

I. The stated reason for noncompliance with our request is unpersuasive and has no basis in law.

Congress has a "broad and indispensable" power to conduct oversight, which "encompasses inquiries into the administration of existing laws, studies of proposed laws, and surveys in our social, economic or political system for the purpose of enabling Congress to remedy them."[11] The Supreme Court has recognized that Congress's oversight authority is not restricted by ongoing civil and criminal investigations.

In *Sinclair v. United States*, the Court noted that the pendency of litigation does not stop

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[5] Call with Counsel and Committee Staff, H. Comm. on the Judiciary (Apr. 21, 2025).
[6] Call with Counsel and Committee Staff, H. Comm. on the Judiciary (May 7, 2025); *see* Memorandum for the Sec'y of the Treasury, the Att'y Gen., and the Couns. to the President, *Investigation into Unlawful "Straw Donor" and Foreign Contributions in American Elections* (Apr. 24, 2025).
[7] Call with Counsel and Committee Staff, H. Comm. on the Judiciary (May 7, 2025); *see* Letter from Counsel to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (May 29, 2025).
[8] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to [redacted], Senior Workflow Specialist, ActBlue (May 22, 2025).
[9] Letter from Counsel to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (May 29, 2025). Mr. Onorato also indirectly accused the Committees of having an improper motive of collaborating with DOJ in its reported parallel investigation of ActBlue. As described further below, this allegation is unfounded and based on a distortion of the Committees' May 7 letter to Attorney General Pamela Bondi. *See* Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Hon. Pamela J. Bondi, Att'y Gen., U.S. Dep't of Justice (May 7, 2025).
[10] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025).
[11] *Trump v. Mazars LLP*, 591 U.S. 848, 862 (2020) (internal citations and quotation marks omitted).

Congress's ability to investigate.[12] In that case, the Court held that Congress's authority "directly or through its committees, to require pertinent disclosures in aid of its own constitutional power is not abridged because the information sought to be elicited may also be of use in" civil or criminal suits.[13] Similarly, in *Hutcheson v. United States*, the Court explained that "a congressional committee . . . engaged in a legitimate legislative investigation need not grind to a halt whenever responses to its inquiries might potentially be harmful to a witness in some distinct proceeding . . . or when crime or wrongdoing is exposed."[14] As we have explained, the historical record bears this point out—many congressional investigations have occurred in parallel to Executive Branch investigations of the same or related matters.[15]

Mr. Onorato's request that the Committees "withdraw [our] requests for transcribed interviews until the Department of Justice completes its investigation or clarifies its position with respect to our clients" amounts to a demand that the Committees forgo testimony that is potentially critical to our legislative oversight.[16] Congress may set the terms of its own oversight, compelling testimony in a time, place, and manner of its own choosing.[17] Federal courts have consistently held that witnesses may not "impose [their] own conditions upon the manner of [congressional] inquiry."[18] That is because "a witness does not have the legal right to dictate the conditions under which he will or will not testify"[19] or "to prescribe the conditions under which he may be interrogated by Congress."[20]

Mr. Onorato is wrong to claim that "the Committees will not be prejudiced in any way" by his request to delay your testimony "because President Trump directed that the Attorney

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[12] *Sinclair v. United States*, 279 U.S. 263 (1929).
[13] *Id.* at 295.
[14] *Hutcheson v. United States*, 369 U.S. 599, 618 (1962).
[15] *See, e.g.,* FINAL REPORT OF THE S. SELECT COMM. ON PRESIDENTIAL CAMPAIGN ACTIVITIES, 93rd. Cong (June 1974); Anthony Ripley, *Archibald Cox Appointed Prosecutor for Watergate*, N.Y. TIMES (May 19, 1973); STAFF OF S. SELECT COMM. ON SECRET MILITARY ASSISTANCE TO IRAN AND THE NICARAGUAN OPPOSITION & H. SELECT COMM. TO INVESTIGATE COVERT ARMS TRANSACTIONS WITH IRAN, REPORT OF THE CONGRESSIONAL COMMITTEES INVESTIGATING THE IRAN-CONTRA AFFAIR, 100th. Cong (Nov. 13, 1987); George Lardner, Jr., *Special Counsel Walsh Names 12 Top Assistants for Probe*, WASH. POST (Jan. 7, 1987); FINAL REPORT OF THE S. SPECIAL COMM. TO INVESTIGATE WHITEWATER DEVELOPMENT CORP. AND RELATED MATTERS, 104th. Cong. (June 17, 1996); Stephen Labaton, *Judges Appoint New Prosecutor for Whitewater,* N.Y. TIMES (Aug. 6, 1994); STAFF OF JOINT COMM. ON TAXATION, REPORT OF INVESTIGATION OF ENRON CORPORATION AND RELATED ENTITIES REGARDING FEDERAL TAX AND COMPENSATION ISSUES, AND POLICY RECOMMENDATIONS, 108th. Cong (Feb. 2003); Rebecca Smith, *Justice Confirms Probe Into Enron; Creditors Seek to Delay Sale of Unit*, WALL ST. J. (Jan. 10, 2002); STAFF OF S. PERMANENT SUBCOMM. ON INVESTIGATIONS, WALL STREET AND THE FINANCIAL CRISIS: ANATOMY OF A FINANCIAL COLLAPSE, 112th. Cong (Apr. 13, 2011); *FTC says that it is investigating Countrywide*, NBC NEWS (Aug. 11, 2008).
[16] Letter from Counsel to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (May 29, 2025).
[17] *See, e.g.,* Todd Garvey, *Committee Discretion in Obtaining Witness Testimony*, Cong. Rsch. Serv. No. LSB11093 (Dec. 22, 2023).
[18] *Eisler v. United States*, 170 F. 2d 273, 280 (D.C. Cir. 1948).
[19] *United States v. Costello*, 198 F. 2d 200, 205 (2d Cir. 1952); *see also United States v. Brewster*, 154 F. Supp. 126, 134 (D.D.C. 1957) (finding a witness guilty of Contempt of Congress because "a witness has no right to set his own conditions for testifying").
[20] *United States v. Hintz*, 193 F. Supp. 325, 335 (N.D. Ill. 1961).

General report the results of her investigation . . . within 180 days."[21] To start, 180 days, or six months, represents one-quarter of the duration of the 119th Congress. A six-month delay, as Mr. Onorato demands, risks preventing the Committees from adequately developing the factual record upon which to consider legislative reforms. Moreover, while the President directed the Attorney General to "report" the results of her investigation within six months, potential proceedings arising from that investigation could carry on much longer.[22]

To the extent you adopt the reasoning in ActBlue's June 9 letter—that the Committees' requests violate the First Amendment and the Constitution's Equal Protection Clause by allegedly "selective[ly] focus[ing]" on ActBlue[23]—these bases for noncompliance are also unpersuasive. As a foundational matter, as explained above, Congress is free to choose how to conduct oversight, including which entities to examine and in what manner.[24] A Congressional committee's decision to examine one entity and not another does not violate the Equal Protection Clause, and ActBlue has offered no evidence—because there is none—that the Committees have initiated their oversight on the basis of any "suspect classification."[25] Similarly, with respect to ActBlue's First Amendment argument, the Supreme Court has been clear that the First Amendment does not give witnesses an absolute right to refuse to respond to a Congressional inquiry.[26] Where, as here, a Congressional committee has a valid legislative purpose and the appropriate delegation from the legislative body to investigate, the First Amendment does not insulate a witness from cooperating.[27]

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[21] Letter from Counsel to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (May 29, 2025).
[22] *See* Memorandum for the Sec'y of the Treasury, the Att'y Gen., and the Couns. to the President, *Investigation into Unlawful "Straw Donor" and Foreign Contributions in American Elections* (Apr. 24, 2025).
[23] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025). In addition, ActBlue's complaint about "selective focus" is fundamentally false. As we have explained, the Committees are conducting oversight of ActBlue due to specific allegations, stemming from both congressional testimony and public reports, about ActBlue's ability to prevent straw, foreign, and fraudulent donations. *See American Confidence in Elections: Prohibiting Foreign Interference: Hearing Before the Comm. on H. Admin.,* 118th Cong. (Dec. 18, 2024); Hollie McKay, *Exclusive: Data shows that half of 2019 donations to ActBlue came from untraceable 'unemployed' donors*, FOX NEWS (Sept. 12, 2020); Phill Kline, *Commentary: ActBlue Raises Millions in Suspicious Gift Card Donations*, REALCLEARPOLITICS (Sept. 16, 2020); Steven Kovac*, The Most Expensive Judicial Race in US History Is Raising Questions*, THE EPOCH TIMES (Oct. 21, 2023). ActBlue's claim that the Committees should investigate another online fundraising entity because it also faces "public reports about irregularities" is without merit.
[24] *See* U.S. CONST. art. I, § 1.
[25] *San Antonio Indep. School Dist. v. Rodriguez*, 411 U.S. 1, 18 (1973); *see also United States v. Carolene Products, Co.,* 304 U.S. 144, n. 4 (1938) (stating that a heightened standard of judicial review may be necessary for government actions targeting "discrete and insular minorities")*; City of Cleburne v. Cleburne Living Center, Inc.*, 473 U.S. 432, 440 (1985) (listing "race, alienage, or national origin" as suspect classifications under the Equal Protection Clause); *United States v. Batchelder*, 442 U.S. 114, n. 9 (1979) (including "religion" as a suspect classification). Needless to say, ActBlue does not fall into any of these categories.
[26] *See, e.g.*, *Barenblatt v. United States*, 360 U.S. 109 (1959).
[27] *Id.*

II. The Committees' inquiry has a valid and important legislative purpose.

Mr. Onorato's May 29 letter also alleges that the Committees have promised to "'work collaboratively with DOJ' in its parallel investigation."[28] That selective quotation distorts the Committees' May 7 letter to Attorney General Bondi. In full, the Committees pledged to "work collaboratively with DOJ *to improve and strengthen the integrity of America's electoral system*."[29] That shared policy outcome is not evidence of improper motivation, as Mr. Onorato implies, in the Committees' oversight inquiry.

Likewise, ActBlue's reliance on cherry-picked statements from Chairman Steil without their surrounding context is misleading.[30] ActBlue glaringly omits the remainder of Chairman Steil's statement, in which he stated that a goal of the Committees' oversight is to "put[] in place rules and laws that prevent any abuse in the future."[31] Furthermore, Chairman Steil explicitly acknowledged the differences between the Committee's oversight and the Department's reported investigative activity, explaining that the prosecutorial function is squarely "the domain of the United States Department of Justice."[32] Contrary to ActBlue's claims, the Committees have no "agreement to coordinate the Committees' activities with the Executive Branch," are not conducting this investigation in support of any criminal inquiry, and have not furnished any non-public information to the Department.[33]

The Committees' investigation has a clear—and important—legislative purpose. Congress has a specific interest in ensuring that bad actors, including foreign actors, cannot make fraudulent or illegal political donations through online fundraising platforms. Our oversight to

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[28] Letter from Counsel to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (May 29, 2025) (quoting Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Hon. Pamela J. Bondi, Att'y Gen., U.S. Dep't of Justice (May 7, 2025)).

[29] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Hon. Pamela J. Bondi, Att'y Gen., U.S. Dep't of Justice (May 7, 2025) (italics added).

[30] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025). Separately, individual committee members' motives cannot vitiate a legitimate legislative purpose for an investigation. *Cf. Watkins v. United States,* 354 U.S. 178, 200 (1957) ("[M]otives alone would not vitiate an investigation which has been instituted by a House of Congress if that assembly's legislative purpose is being served.").

[31] *Vicki McKenna Show with Guest Host Matt Kittle – California Ballot Debacle*, THE VICKI MCKENNA SHOW (May 7, 2025), https://podcasts.apple.com/us/podcast/vicki-mckenna-show-with-guest-host-matt-kittle/id1601657419?i=1000706717908 at 1:25:30 – 1:25:35; *id*. at 1:24:45 – 1:24:57 (Chairman Steil reaffirmed that the Committees' objective is to "put in place new laws and policies that prevent the type of abuse we're concerned is occurring.").

[32] *See id.* at 1:25:02 – 1:25:06.

[33] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025).

date indicates that current law may be insufficient to stop these illicit donations.[34] The Committees are considering a wide array of potential legislative reforms to address these concerns. These may include a requirement that card verification values be collected for online political donations,[35] restrictions on political donations made using gift cards, prepaid cards, or foreign credit cards, and enhanced reporting requirements for online fundraising conduits. Some or all of these requirements could be enforced with criminal penalties.

Such legislation is squarely within the power of Congress and within the jurisdiction of the Committees. Article I of the Constitution states that "Congress may at any time by Law make or alter . . . Regulations" pertaining to federal elections.[36] Under the rules of the House of Representatives, the Committee on House Administration has jurisdiction over "Federal elections."[37] The Committee on the Judiciary has jurisdiction over "criminal law enforcement" and "civil liberties," including political speech.[38] The Committee on Oversight and Government Reform has jurisdiction to conduct oversight over "any matter" at "any time" to inform legislative reforms by any congressional committee.[39]

Finally, ActBlue's assertion that the Committees' release of a staff report "suggests that the investigation has become something other than a legislative fact-gathering effort" lacks merit. [40] Congressional staff reports are a common mechanism by which committees present information to inform legislative reforms. Indeed, the Committees' staff report specifically notes that the Committees will "continue investigating to inform potential legislative reforms to improve and strengthen our democracy."[41]

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You are uniquely positioned to aid the Committees' oversight. Documents produced to the Committees indicate that you have been the top fraud-prevention employee at ActBlue, the

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[34] *See* STAFF OF COMM. ON H. ADMIN., H. COMM. ON THE JUDICIARY, & H. COMM. ON OVERSIGHT & GOV'T REFORM, FRAUD ON ACTBLUE: HOW THE DEMOCRATS' TOP FUNDRAISING PLATFORM OPENS THE DOOR FOR ILLEGAL ELECTION CONTRIBUTIONS (Apr. 2, 2025).
[35] *See, e.g.,* H.R. 9488, Secure Handling of Internet Electronic Donations (SHIELD) Act, 118th. Cong. (2024).
[36] U.S. CONST. art. I, § 4, cl. 1.
[37] Rules of the House of Representatives R. X, cl. 1(k) Committee on House Administration (2025).
[38] Rules of the House of Representatives R. X, cl. 1(l) Committee on the Judiciary (2025); see *Citizens United v. Federal Election Comm'n*, 558 U.S. 310 (2010).
[39] Rules of the House of Representatives R. X, cl 4(c)(2).
[40] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025).
[41] STAFF OF COMM. ON H. ADMIN., H. COMM. ON THE JUDICIARY, & H. COMM. ON OVERSIGHT & GOV'T REFORM, FRAUD ON ACTBLUE: HOW THE DEMOCRATS' TOP FUNDRAISING PLATFORM OPENS THE DOOR FOR ILLEGAL ELECTION CONTRIBUTIONS (Apr. 2, 2025) at 3. In addition, ActBlue's claims that the Committees "mischaracterized the contents of the documents" or "distorted a selection of out-of-context communications" are inaccurate. The Committees' report includes full versions of every document cited in the report in a 458-page appendix. At the request of ActBlue's former counsel, the Committees redacted certain portions of these documents to protect the identities of ActBlue staff and potentially sensitive information. *See* Letter from Brian D. Smith, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Dec. 23, 2024).

nation's largest online political fundraising platform, since 2020.[42] The Committees have found significant evidence that ActBlue had "a fundamentally unserious approach to fraud prevention" during this period.[43] For example, the Committees discovered that ActBlue weakened its fraud-prevention standards twice in 2024 despite knowledge of significant attempted fraud on the platform, including from foreign actors.[44] Similarly, during your tenure, ActBlue's training guide for new fraud-prevention staff instructed employees to "'look for reasons to accept contributions'" rather than assess potentially fraudulent donations with a skeptical eye.[45] Other internal ActBlue documents show that top fraud-prevention staff, including you, have assessed that there were several mechanisms by which bad actors could evade ActBlue's fraud-prevention systems and make illicit donations.[46] In order to legislate effectively, the Committees must first gather more information about these and other instances of potentially fraudulent donations being made through online fundraising platforms.

Accordingly, please find attached a subpoena compelling your appearance for a deposition on July 15, 2025.

Sincerely,

Bryan Steil
Chairman
Committee on House Administration

Jim Jordan
Chairman
Committee on the Judiciary

James Comer
Chairman
Committee on Oversight and Government Reform

cc: The Honorable Jamie Raskin, Ranking Member, Committee on the Judiciary

The Honorable Joseph D. Morelle, Ranking Member, Committee on House Administration

[42] *See, e.g.,* STAFF OF COMM. ON H. ADMIN., H. COMM. ON THE JUDICIARY, & H. COMM. ON OVERSIGHT & GOV'T REFORM, FRAUD ON ACTBLUE: HOW THE DEMOCRATS' TOP FUNDRAISING PLATFORM OPENS THE DOOR FOR ILLEGAL ELECTION CONTRIBUTIONS (Apr. 2, 2025) at App'x Ex. 5, 13, 16, 17, 24, 29, 34, 48-50.
[43] *Id.* at 1.
[44] *Id.* at 1-2.
[45] *Id.* at 11.
[46] *Id.* at 17-19.

The Honorable Robert Garcia, Ranking Member, Committee on Oversight and Government Reform

Enclosure

Congress of the United States

Washington, DC 20515

June 25, 2025

Ms. Alyssa Twomey
Former Vice President of Customer Service
ActBlue
c/o Danny Onorato
Schertler Onorato Mead & Sears
555 13th Street, NW
Suite 500 West
Washington, DC 20004

Dear Ms. Twomey:

The Committee on House Administration, the Committee on the Judiciary, and the Committee on Oversight and Government Reform are charged with upholding fundamental American civil liberties and protecting the integrity of American elections. In light of allegations that online fundraising platforms that serve as conduits for political donations have accepted fraudulent donations from domestic and foreign sources,[1] the Committees are conducting oversight to inform potential legislative reforms.[2] To further our oversight and legislative reforms, on April 18, 2025, the Committees requested your appearance at a transcribed interview.[3] To date, you have failed to comply with the Committees' request. Therefore, the Committee on House Administration must resort to compulsory process to obtain your testimony.

The Committees first sought your informal testimony on March 20, 2025.[4] Following this initial attempt, on March 31, Danny Onorato, your attorney, contacted the Judiciary Committee

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[1] *See* Miranda Devine, *Potential ActBlue criminal charges over possible fraud donations once again reveal the Dems' fraud campaign*, N.Y. POST (Sept. 19, 2024); Josh Christenson, *Treasury finds hundreds of transactions linked to fundraising platform ActBlue flagged by banks: GOP memo*, N.Y. POST (Oct. 29, 2024); Breanne Deppisch, *Democrat platform ActBlue subpoenaed by House committee amid concerns foreign donors exploited security flaws*, FOX NEWS (Oct. 31, 2024).

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[3] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Ms. Alyssa Twomey, Former Vice President of Customer Service, ActBlue (Apr. 18, 2025).

[4] Call from Committee Staff, H. Comm. on the Judiciary, to Ms. Alyssa Twomey (Mar. 20, 2025).

to inform us that you had retained him to represent you in this matter.[5] On April 18, the Committees formally requested that you appear for a voluntary transcribed interview.[6] On an April 21 call with Committee staff, Mr. Onorato indicated that you had agreed to appear for a voluntary transcribed interview.[7] At that time, the Committees agreed to prioritize scheduling Senior Workflow Specialist [redacted] transcribed interview for late May, with others—including yours—to follow. While the Committees acknowledged that it may be more productive to interview other ActBlue employees after receiving documents responsive to our April 2 request to ActBlue, at no point did we agree to suspend scheduling discussions for any current or former ActBlue employees.

On a May 7 call with Mr. Onorato, the Committees—having received an initial document production from ActBlue two days prior—planned to finalize the date for [redacted] transcribed interview and begin scheduling discussions for other interviewees. However, on that call, Mr. Onorato notified the Committee that he would advise his clients not to appear before the Committee until he had "more information" about a reported executive branch investigation into "the unlawful use of online fundraising platforms to make 'straw' or 'dummy' contributions or foreign contributions to political candidates and committees," and indicated this was the basis for your refusal to cooperate voluntarily with the Committees.[8]

On May 22, the Committees reiterated our request for your testimony.[9] On May 29, Mr. Onorato responded and once again asked the Committees to "withdraw [our] requests for transcribed interviews until the Department of Justice completes its investigation or clarifies its position with respect to our clients."[10] On June 9, counsel for ActBlue separately wrote to the Committees, raising additional objections.[11]

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[5] Call from Counsel to Committee Staff, H. Comm. on the Judiciary (Mar. 31, 2025).
[6] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Ms. Alyssa Twomey, Former Vice President of Customer Service, ActBlue (Apr. 18, 2025).
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[11] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025).

I. The stated reason for noncompliance with our request is unpersuasive and has no basis in law.

Congress has a "broad and indispensable" power to conduct oversight, which "encompasses inquiries into the administration of existing laws, studies of proposed laws, and surveys in our social, economic or political system for the purpose of enabling Congress to remedy them."[12] The Supreme Court has recognized that Congress's oversight authority is not restricted by ongoing civil and criminal investigations.

In *Sinclair v. United States*, the Court noted that the pendency of litigation does not stop Congress's ability to investigate.[13] In that case, the Court held that Congress's authority "directly or through its committees, to require pertinent disclosures in aid of its own constitutional power is not abridged because the information sought to be elicited may also be of use in" civil or criminal suits.[14] Similarly, in *Hutcheson v. United States*, the Court explained that "a congressional committee . . . engaged in a legitimate legislative investigation need not grind to a halt whenever responses to its inquiries might potentially be harmful to a witness in some distinct proceeding . . . or when crime or wrongdoing is exposed."[15] As we have explained, the historical record bears this point out—many congressional investigations have occurred in parallel to Executive Branch investigations of the same or related matters.[16]

Mr. Onorato's request that the Committees "withdraw [our] requests for transcribed interviews until the Department of Justice completes its investigation or clarifies its position with respect to our clients" amounts to a demand that the Committees forgo testimony that is potentially critical to our legislative oversight.[17] Congress may set the terms of its own oversight, compelling testimony in a time, place, and manner of its own choosing.[18] Federal courts have consistently held that witnesses may not "impose [their] own conditions upon the manner of

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[12] *Trump v. Mazars LLP*, 591 U.S. 848, 862 (2020) (internal citations and quotation marks omitted).
[13] *Sinclair v. United States*, 279 U.S. 263 (1929).
[14] *Id.* at 295.
[15] *Hutcheson v. United States*, 369 U.S. 599, 618 (1962).
[16] *See, e.g.,* FINAL REPORT OF THE S. SELECT COMM. ON PRESIDENTIAL CAMPAIGN ACTIVITIES, 93rd. Cong (June 1974); Anthony Ripley, *Archibald Cox Appointed Prosecutor for Watergate*, N.Y. TIMES (May 19, 1973); STAFF OF S. SELECT COMM. ON SECRET MILITARY ASSISTANCE TO IRAN AND THE NICARAGUAN OPPOSITION & H. SELECT COMM. TO INVESTIGATE COVERT ARMS TRANSACTIONS WITH IRAN, REPORT OF THE CONGRESSIONAL COMMITTEES INVESTIGATING THE IRAN-CONTRA AFFAIR, 100th. Cong (Nov. 13, 1987); George Lardner, Jr., *Special Counsel Walsh Names 12 Top Assistants for Probe*, WASH. POST (Jan. 7, 1987); FINAL REPORT OF THE S. SPECIAL COMM. TO INVESTIGATE WHITEWATER DEVELOPMENT CORP. AND RELATED MATTERS, 104th. Cong. (June 17, 1996); Stephen Labaton, *Judges Appoint New Prosecutor for Whitewater,* N.Y. TIMES (Aug. 6, 1994); STAFF OF JOINT COMM. ON TAXATION, REPORT OF INVESTIGATION OF ENRON CORPORATION AND RELATED ENTITIES REGARDING FEDERAL TAX AND COMPENSATION ISSUES, AND POLICY RECOMMENDATIONS, 108th. Cong (Feb. 2003); Rebecca Smith, *Justice Confirms Probe Into Enron; Creditors Seek to Delay Sale of Unit*, WALL ST. J. (Jan. 10, 2002); STAFF OF S. PERMANENT SUBCOMM. ON INVESTIGATIONS, WALL STREET AND THE FINANCIAL CRISIS: ANATOMY OF A FINANCIAL COLLAPSE, 112th. Cong (Apr. 13, 2011); *FTC says that it is investigating Countrywide*, NBC NEWS (Aug. 11, 2008).
[17] Letter from Counsel to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (May 29, 2025).
[18] *See, e.g.,* Todd Garvey, *Committee Discretion in Obtaining Witness Testimony*, Cong. Rsch. Serv. No. LSB11093 (Dec. 22, 2023).

[congressional] inquiry."[19] That is because "a witness does not have the legal right to dictate the conditions under which he will or will not testify"[20] or "to prescribe the conditions under which he may be interrogated by Congress."[21]

Mr. Onorato is wrong to claim that "the Committees will not be prejudiced in any way" by his request to delay your testimony "because President Trump directed that the Attorney General report the results of her investigation . . . within 180 days."[22] To start, 180 days, or six months, represents one-quarter of the duration of the 119th Congress. A six-month delay, as Mr. Onorato demands, risks preventing the Committees from adequately developing the factual record upon which to consider legislative reforms. Moreover, while the President directed the Attorney General to "report" the results of her investigation within six months, potential proceedings arising from that investigation could carry on much longer.[23]

To the extent you adopt the reasoning in ActBlue's June 9 letter—that the Committees' requests violate the First Amendment and the Constitution's Equal Protection Clause by allegedly "selective[ly] focus[ing]" on ActBlue[24]—these bases for noncompliance are also unpersuasive. As a foundational matter, as explained above, Congress is free to choose how to conduct oversight, including which entities to examine and in what manner.[25] A Congressional committee's decision to examine one entity and not another does not violate the Equal Protection Clause, and ActBlue has offered no evidence—because there is none—that the Committees have initiated their oversight on the basis of any "suspect classification."[26] Similarly, with respect to

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[19] *Eisler v. United States*, 170 F. 2d 273, 280 (D.C. Cir. 1948).
[20] *United States v. Costello*, 198 F. 2d 200, 205 (2d Cir. 1952); *see also United States v. Brewster*, 154 F. Supp. 126, 134 (D.D.C. 1957) (finding a witness guilty of Contempt of Congress because "a witness has no right to set his own conditions for testifying").
[21] *United States v. Hintz*, 193 F. Supp. 325, 335 (N.D. Ill. 1961).
[22] Letter from Counsel to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (May 29, 2025).
[23] *See* Memorandum for the Sec'y of the Treasury, the Att'y Gen., and the Couns. to the President, *Investigation into Unlawful "Straw Donor" and Foreign Contributions in American Elections* (Apr. 24, 2025).
[24] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025). In addition, ActBlue's complaint about "selective focus" is fundamentally false. As we have explained, the Committees are conducting oversight of ActBlue due to specific allegations, stemming from both congressional testimony and public reports, about ActBlue's ability to prevent straw, foreign, and fraudulent donations. *See American Confidence in Elections: Prohibiting Foreign Interference: Hearing Before the Comm. on H. Admin.,* 118th Cong. (Dec. 18, 2024); Hollie McKay, *Exclusive: Data shows that half of 2019 donations to ActBlue came from untraceable 'unemployed' donors*, FOX NEWS (Sept. 12, 2020); Phill Kline, *Commentary: ActBlue Raises Millions in Suspicious Gift Card Donations*, REALCLEARPOLITICS (Sept. 16, 2020); Steven Kovac*, The Most Expensive Judicial Race in US History Is Raising Questions*, THE EPOCH TIMES (Oct. 21, 2023). ActBlue's claim that the Committees should investigate another online fundraising entity because it also faces "public reports about irregularities" is without merit.
[25] *See* U.S. CONST. art. I, § 1.
[26] *San Antonio Indep. School Dist. v. Rodriguez*, 411 U.S. 1, 18 (1973); *see also United States v. Carolene Products, Co.,* 304 U.S. 144, n. 4 (1938) (stating that a heightened standard of judicial review may be necessary for government actions targeting "discrete and insular minorities")*; City of Cleburne v. Cleburne Living Center, Inc.*, 473 U.S. 432, 440 (1985) (listing "race, alienage, or national origin" as suspect classifications under the Equal Protection Clause); *United States v. Batchelder*, 442 U.S. 114, n. 9 (1979) (including "religion" as a suspect classification). Needless to say, ActBlue does not fall into any of these categories.

ActBlue's First Amendment argument, the Supreme Court has been clear that the First Amendment does not give witnesses an absolute right to refuse to respond to a Congressional inquiry.[27] Where, as here, a Congressional committee has a valid legislative purpose and the appropriate delegation from the legislative body to investigate, the First Amendment does not insulate a witness from cooperating.[28]

II. The Committees' inquiry has a valid and important legislative purpose.

Mr. Onorato's May 29 letter also alleges that the Committees have promised to "'work collaboratively with DOJ' in its parallel investigation."[29] That selective quotation distorts the Committees' May 7 letter to Attorney General Bondi. In full, the Committees pledged to "work collaboratively with DOJ *to improve and strengthen the integrity of America's electoral system*."[30] That shared policy outcome is not evidence of improper motivation, as Mr. Onorato implies, in the Committees' oversight inquiry.

Likewise, ActBlue's reliance on cherry-picked statements from Chairman Steil without their surrounding context is misleading.[31] ActBlue glaringly omits the remainder of Chairman Steil's statement, in which he stated that a goal of the Committees' oversight is to "put[] in place rules and laws that prevent any abuse in the future."[32] Furthermore, Chairman Steil explicitly acknowledged the differences between the Committee's oversight and the Department's reported investigative activity, explaining that the prosecutorial function is squarely "the domain of the United States Department of Justice."[33] Contrary to ActBlue's claims, the Committees have no "agreement to coordinate the Committees' activities with the Executive Branch," are not conducting this investigation in support of any criminal inquiry, and have not furnished any non-

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[27] *See, e.g.*, *Barenblatt v. United States*, 360 U.S. 109 (1959).
[28] *Id.*
[29] Letter from Counsel to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (May 29, 2025) (quoting Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Hon. Pamela J. Bondi, Att'y Gen., U.S. Dep't of Justice (May 7, 2025)).
[30] Letter from Rep. Bryan Steil, Chairman, Comm. on H. Admin., Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Hon. Pamela J. Bondi, Att'y Gen., U.S. Dep't of Justice (May 7, 2025) (italics added).
[31] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025). Separately, individual committee members' motives cannot vitiate a legitimate legislative purpose for an investigation. *Cf. Watkins v. United States,* 354 U.S. 178, 200 (1957) ("[M]otives alone would not vitiate an investigation which has been instituted by a House of Congress if that assembly's legislative purpose is being served.").
[32] *Vicki McKenna Show with Guest Host Matt Kittle – California Ballot Debacle*, THE VICKI MCKENNA SHOW (May 7, 2025), https://podcasts.apple.com/us/podcast/vicki-mckenna-show-with-guest-host-matt-kittle/id1601657419?i=1000706717908 at 1:25:30 – 1:25:35; *id*. at 1:24:45 – 1:24:57 (Chairman Steil reaffirmed that the Committees' objective is to "put in place new laws and policies that prevent the type of abuse we're concerned is occurring.").
[33] *See id.* at 1:25:02 – 1:25:06.

public information to the Department.[34]

The Committees' investigation has a clear—and important—legislative purpose. Congress has a specific interest in ensuring that bad actors, including foreign actors, cannot make fraudulent or illegal political donations through online fundraising platforms. Our oversight to date indicates that current law may be insufficient to stop these illicit donations.[35] The Committees are considering a wide array of potential legislative reforms to address these concerns. These may include a requirement that card verification values be collected for online political donations,[36] restrictions on political donations made using gift cards, prepaid cards, or foreign credit cards, and enhanced reporting requirements for online fundraising conduits. Some or all of these requirements could be enforced with criminal penalties.

Such legislation is squarely within the power of Congress and within the jurisdiction of the Committees. Article I of the Constitution states that "Congress may at any time by Law make or alter . . . Regulations" pertaining to federal elections.[37] Under the rules of the House of Representatives, the Committee on House Administration has jurisdiction over "Federal elections."[38] The Committee on the Judiciary has jurisdiction over "criminal law enforcement" and "civil liberties," including political speech.[39] The Committee on Oversight and Government Reform has jurisdiction to conduct oversight over "any matter" at "any time" to inform legislative reforms by any congressional committee.[40]

Finally, ActBlue's assertion that the Committees' release of a staff report "suggests that the investigation has become something other than a legislative fact-gathering effort" lacks merit. [41] Congressional staff reports are a common mechanism by which committees present information to inform legislative reforms. Indeed, the Committees' staff report specifically notes that the Committees will "continue investigating to inform potential legislative reforms to improve and strengthen our democracy."[42]

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[34] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025).

[35] *See* STAFF OF COMM. ON H. ADMIN., H. COMM. ON THE JUDICIARY, & H. COMM. ON OVERSIGHT & GOV'T REFORM, FRAUD ON ACTBLUE: HOW THE DEMOCRATS' TOP FUNDRAISING PLATFORM OPENS THE DOOR FOR ILLEGAL ELECTION CONTRIBUTIONS (Apr. 2, 2025).

[36] *See, e.g.,* H.R. 9488, Secure Handling of Internet Electronic Donations (SHIELD) Act, 118th. Cong. (2024).

[37] U.S. CONST., art. I, § 4, cl. 1.

[38] Rules of the House of Representatives R. X, cl. 1(k) Committee on House Administration (2025).

[39] Rules of the House of Representatives R. X, cl. 1(l) Committee on the Judiciary (2025); see *Citizens United v. Federal Election Comm'n*, 558 U.S. 310 (2010).

[40] Rules of the House of Representatives R. X, cl 4(c)(2).

[41] Letter from Mr. Vincent Cohen & Mr. Jonathan Streeter, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, Rep. James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, & Rep. Bryan Steil, Chairman, Comm. on H. Admin. (June 9, 2025).

[42] STAFF OF COMM. ON H. ADMIN., H. COMM. ON THE JUDICIARY, & H. COMM. ON OVERSIGHT & GOV'T REFORM, FRAUD ON ACTBLUE: HOW THE DEMOCRATS' TOP FUNDRAISING PLATFORM OPENS THE DOOR FOR ILLEGAL ELECTION CONTRIBUTIONS (Apr. 2, 2025) at 3. In addition, ActBlue's claims that the Committees "mischaracterized the contents of the documents" or "distorted a selection of out-of-context communications" are inaccurate. The Committees' report includes full versions of every document cited in the report in a 458-page appendix. At the request of ActBlue's former counsel, the Committees redacted certain portions of these documents to protect the

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You are uniquely positioned to aid the Committees' oversight. Documents produced to the Committees indicate that while you served as ActBlue's Vice President of Customer Service, you managed ActBlue's fraud-prevention team.[43] The Committees have found significant evidence that ActBlue had "a fundamentally unserious approach to fraud prevention" during this period.[44] For example, the Committees discovered that ActBlue weakened its fraud-prevention standards twice in 2024 despite knowledge of significant attempted fraud on the platform, including from foreign actors.[45] Similarly, ActBlue's training guide for new fraud-prevention staff instructed employees to "'look for reasons to accept contributions'" rather than assess potentially fraudulent donations with a skeptical eye.[46] Other internal ActBlue documents show that top fraud-prevention staff assessed that there were several mechanisms by which bad actors could evade ActBlue's fraud-prevention systems and make illicit donations.[47] In order to legislate effectively, the Committees must first gather more information about these and other instances of potentially fraudulent donations being made through online fundraising platforms.

Accordingly, please find attached a subpoena compelling your appearance for a deposition on July 23, 2025.

Sincerely,

Bryan Steil
Chairman
Committee on House Administration

Jim Jordan
Chairman
Committee on the Judiciary

James Comer
Chairman
Committee on Oversight and Government Reform

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identities of ActBlue staff and potentially sensitive information. *See* Letter from Brian D. Smith, Counsel for ActBlue, to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Dec. 23, 2024).

[43] *See, e.g.,* STAFF OF COMM. ON H. ADMIN., H. COMM. ON THE JUDICIARY, & H. COMM. ON OVERSIGHT & GOV'T REFORM, FRAUD ON ACTBLUE: HOW THE DEMOCRATS' TOP FUNDRAISING PLATFORM OPENS THE DOOR FOR ILLEGAL ELECTION CONTRIBUTIONS (Apr. 2, 2025) at App'x Ex. 33; ActBlue Slide Deck, *The Value of Fraud Review at ActBlue* at AB-HJC-000509 (on file with the Comms.); ActBlue Internal Memorandum, *Model Governance Committee/Trust & Safety Team Proposal* at AB-HJC-000724 (on file with the Comms.).

[44] STAFF OF COMM. ON H. ADMIN., H. COMM. ON THE JUDICIARY, & H. COMM. ON OVERSIGHT & GOV'T REFORM,. FRAUD ON ACTBLUE: HOW THE DEMOCRATS' TOP FUNDRAISING PLATFORM OPENS THE DOOR FOR ILLEGAL ELECTION CONTRIBUTIONS (Apr. 2, 2025) at 1.

[45] *Id.* at 1-2.

[46] *Id.* at 11.

[47] *Id.* at 17-19.

cc: The Honorable Jamie Raskin, Ranking Member, Committee on the Judiciary

The Honorable Joseph D. Morelle, Ranking Member, Committee on House Administration

The Honorable Robert Garcia, Committee on Oversight and Government Reform

Enclosure