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5 COMMITTEE ON THE JUDICIARY,
6 JOINT WITH THE
7 COMMITTEE ON HOUSE ADMINISTRATION
8 AND THE
9 COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM,
10 U.S. HOUSE OF REPRESENTATIVES,
11 WASHINGTON, D.C.
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16 DEPOSITION OF: MATT DeBERGALIS
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19 Thursday, August 20, 2026
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21 Washington, D.C.
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24 The deposition in the above matter was held in room 2237, Rayburn House Office Building,
25 commencing at 10:24 a.m.

1 Appearances:

5 For the COMMITTEE ON THE JUDICIARY:

7 [REDACTED], DEPUTY DIGITAL DIRECTOR

8 [REDACTED] DEPUTY GENERAL COUNSEL

9 [REDACTED], COUNSEL

10 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

11 [REDACTED] COUNSEL

12 [REDACTED] MINORITY COUNSEL

13 [REDACTED], MINORITY CHIEF COUNSEL AND SENIOR ADVISOR

14 [REDACTED], MINORITY FELLOW

15 [REDACTED], MINORITY CLERK INTERN

16 [REDACTED] MINORITY SENIOR COUNSEL

19 For the COMMITTEE ON HOUSE ADMINISTRATION:

21 [REDACTED], DEPUTY GENERAL COUNSEL

22 [REDACTED], MINORITY DEPUTY STAFF DIRECTOR

23 [REDACTED], MINORITY INTERN

24 [REDACTED], MINORITY POLICY DIRECTOR

1 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

2
3 [REDACTED], DEPUTY CHIEF COUNSEL FOR INVESTIGATIONS

4 [REDACTED], DEPUTY STAFF DIRECTOR

5 [REDACTED], MINORITY CHIEF COUNSEL

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7
8
9 For THE WITNESS:

10
11 KIMBERLY HAMM, ESQ.

12 JAMES M. KOUKIOS, ESQ.

13 Morrison Foerster

14 2100 L Street NW, Suite 900

15 Washington, D.C. 20037

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

2 Good morning. This is a deposition of Mr. DeBergalis.

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

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

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

11 On August 17th, 2026, the committees issued subpoenas for the deposition today, for August
12 20th. I've marked the August 17th subpoena as exhibit No. 1.

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

15 [REDACTED]. On August 17th, the committee noticed today's deposition. I've marked the
16 August 17th notice as exhibit No. 2.

17 [DeBergalis Exhibit No. 2
18 was marked for identification.]

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

20 The Witness. Matthew DeBergalis.

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

22 Ms. Hamm. Kimberly Hamm, Morrison Foerster.

23 Mr. Koukios. James Koukios, Morrison Foerster.

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

25 I'll now have everyone else from the committees who are here in the room introduce

1 themselves as well.

2 [REDACTED]: [REDACTED], with Chairman Jordan's staff.

3 [REDACTED] [REDACTED], with Chairman Steil's staff.

4 [REDACTED] [REDACTED] with Chairman Comer.

5 [REDACTED] [REDACTED] with Ranking Member Raskin.

6 [REDACTED] [REDACTED] Ranking Member Morelle.

7 [REDACTED] [REDACTED] Ranking Member Garcia.

8 [REDACTED] [REDACTED] Ranking Member Raskin.

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

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

11 [REDACTED] [REDACTED] Chairman Comer's staff.

12 [REDACTED] [REDACTED] Chairman Jordan's staff.

13 [REDACTED] [REDACTED] Ranking Member Morelle.

14 [REDACTED] [REDACTED] Ranking Member Morelle.

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

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

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

18 [REDACTED] I will now review the ground rules and guidelines that we'll follow during
19 today's deposition.

20 The committee will conduct today's deposition in accordance with the House's "Regulations
21 for the Use of Deposition Authority," which has been provided to your counsel prior to today.

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

25 There will be two staff counsel per side asking the questions. To the extent members have

1 questions for the witness, they will be propounded during their side's respective rounds.

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

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

5 We ordinarily take a short break at the end of each hour, but if you would like to take a break
6 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 make a
8 written record, so we ask that you give verbal responses to all questions. Do you understand that?

9 The Witness. I do.

10 [REDACTED] In addition, the committee's videographer is making a video record of today's
11 proceeding.

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

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

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

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

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

1 The Witness. I do.

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

4 The Witness. I do.

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

8 Do you understand this?

9 The Witness. Yes.

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

13 Do you understand this?

14 The Witness. Yes.

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

17 The Witness. No.

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

23 Finally, I'll make note for everyone in the room here today that the content of what we
24 discuss here is confidential under the House deposition regulations. Under the rules, the chairman
25 and ranking minority member shall consult before any release of testimony, transcripts, including

1 portions thereof. This means it is a violation of House and Committee rules to disclose content of a
2 deposition prior to its official release.

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

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

8 We'll go ahead and start with the minority.

9 [REDACTED] Nothing from us. Thanks.

10 [REDACTED] Ms. Hamm?

11 Ms. Hamm. Thank you.

12 In June of 2026, the committees reached out to my client for the first time concerning this
13 investigation, possibly unaware that he has not served on the ActBlue board for over a year.

14 Out of respect for this institution and these committees, Mr. DeBergalis has traveled here
15 today, but based on our understanding of the scope of the committees' questions, he intends to
16 follow our advice to invoke his rights under the Fifth Amendment.

17 His invocation of the Fifth Amendment is in no way an admission of his own liability or that of
18 ActBlue. Honest and innocent people find themselves in circumstances where they are forced to
19 invoke the Fifth Amendment, and this is one of those circumstances.

20 We believe this is the case due to the State and Federal investigations relating to ActBlue that
21 have arisen out of the committees' investigation to date. For example, in September 2024,
22 Chairman Steil asked several State attorneys general to investigate potential criminal activity
23 relating to ActBlue. According to public reports, at least one State -- I believe more -- could
24 investigate in response to the chairman's letter.

25 In April 2025, the President directed the Attorney General to investigate ActBlue, citing the

1 committees' investigation. And, more recently, the committee chairmen have suggested that
2 ActBlue's board participated in this conduct at the organization.

3 Finally, some of your questions today may independently call for attorney-client-privileged
4 communications or other information subject to privileges belonging to ActBlue. Nothing my client
5 says should be deemed to waive that privilege, which belongs to ActBlue, and he may, in certain
6 circumstances, make a statement that reflects that.

7 Again, this is a privilege that really has to be asserted or waived by ActBlue, but he may flag
8 for the committees that there are certain questions that could implicate that issue.

9 Thank you for the opportunity.

10 [REDACTED] Okay.

11 The court reporter will now swear the witness in.

12 The Reporter. Please raise your right hand.

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

15 The Witness. I do.

16 [REDACTED] The clock now reads 10:31 a.m. We'll start our first round of questioning.

17 EXAMINATION

18 [REDACTED]
19 Q Mr. DeBergalis, how long have you served on the board of ActBlue?

20 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
21 Fifth Amendment to the U.S. Constitution.

22 Q Are you able to tell us why ActBlue is so bad at stopping fraudulent donations?

23 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
24 Fifth Amendment to the U.S. Constitution.

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

1 website selling physical goods?

2 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
3 Fifth Amendment to the U.S. Constitution.

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

6 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
7 Fifth Amendment to the U.S. Constitution.

8 Q As a board member, were you ever made aware that the 2024 goals of ActBlue's top
9 fraud specialist included allowing more fraud on ActBlue?

10 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
11 Fifth Amendment to the U.S. Constitution.

12 Q Was the board ever made aware that in 2024 ActBlue took a, quote, "more lenient
13 approach," end quote, to fraud?

14 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
15 Fifth Amendment to the U.S. Constitution.

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

17 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
18 Fifth Amendment to the U.S. Constitution.

19 Q Have ActBlue executives ever instructed ActBlue employees to allow more fraud on the
20 platform or weaken ActBlue's fraud-prevention defenses?

21 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
22 Fifth Amendment to the U.S. Constitution.

23 Q Did ActBlue require CVVs, ban credit card donations, prepaid donations, and foreign
24 donations because it was worried about legal scrutiny of fraud committed using these mechanisms?

25 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the

1 Fifth Amendment of the U.S. Constitution.

2 Q How many fraud campaigns have been conducted on ActBlue that used gift cards or
3 prepaid cards?

4 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
5 Fifth Amendment to the U.S. Constitution.

6 Q Was the board ever made aware of fraud campaigns conducted on ActBlue?

7 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
8 Fifth Amendment to the U.S. Constitution.

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

10 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
11 Fifth Amendment to the U.S. Constitution.

12 Q Why does ActBlue test potential fraud-prevention policy changes for their effect on
13 Democrat donations before implementing them?

14 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
15 Fifth Amendment to the U.S. Constitution.

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

17 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
18 Fifth Amendment to the U.S. Constitution.

19 Q Why does ActBlue refuse to verify the U.S. passport information for foreign
20 contributions to ensure they are legitimate?

21 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
22 Fifth Amendment to the U.S. Constitution.

23 Q Did Ms. Wallace-Jones lie to Congress?

24 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
25 Fifth Amendment to the U.S. Constitution.

1 Q Why did ActBlue accept up to \$38 million in donations with foreign indicators during the
2 2024 election cycle?

3 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
4 Fifth Amendment to the U.S. Constitution.

5 Q Was Zain Ahmad placed on leave because he chose to blow the whistle on pervasive
6 fraud and misconduct at ActBlue?

7 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
8 Fifth Amendment to the U.S. Constitution.

9 Q Why did the whole legal and compliance team leave ActBlue following the 2024
10 election?

11 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
12 Fifth Amendment to the U.S. Constitution.

13 Q Were you concerned by statements in interim general counsel Aaron Ting's resignation
14 letter, where he stated the reason for his departure included, quote, "ActBlue's past practices for
15 screening political donations from abroad and its past representations to Congress regarding foreign
16 donations and related matters," end quote?

17 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
18 Fifth Amendment to the U.S. Constitution.

19 Q Why was ActBlue leadership, according to Mr. Ting, quote, "not fully committed to
20 transparently addressing with the board the seriousness of ActBlue's misconduct"?

21 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
22 Fifth Amendment to the U.S. Constitution.

23 Q Why did Ms. Wallace-Jones tell ActBlue's outside counsel and executives on a video call
24 in February 2025 that she "refuse[d] to let [them] go to the board," end quote, with information
25 about ActBlue's potential legal vulnerability?

1 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
2 Fifth Amendment of the U.S. Constitution.

3 Q Did ActBlue ever take steps to address the concerns in the Covington memorandum
4 prepared by Dana Remus?

5 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
6 Fifth Amendment to the U.S. Constitution.

7 Q Did the board ever receive copies of Ms. Remus's memoranda?

8 A On the advice of counsel, I respectfully decline to answer pursuant to my right under the
9 Fifth Amendment to the U.S. Constitution.

10 [REDACTED] We'll go off the record.

11 [Discussion off the record.]

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

13 Ms. Hamm. Thank you.

14 I do want to point out, as I mentioned at the start, that some of these questions do appear to
15 implicate the attorney-client privilege of ActBlue, so we would ask that you work with ActBlue to
16 determine the scope of those privileges. And nothing that my client has said should be deemed to
17 waive any of those privileges.

18 [REDACTED] Thanks.

19 We'll go off the record.

20 Ms. Hamm. Thank you.

21 [Whereupon, at 10:38 a.m., the deposition was concluded.]

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