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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: MUTHONI WAMBU KRAAL
17
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19 Monday, August 24, 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 10:01 a.m.

1 Appearances:

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5 For the COMMITTEE ON THE JUDICIARY:

6
7 [REDACTED], DEPUTY DIGITAL DIRECTOR

8 [REDACTED], DEPUTY GENERAL COUNSEL

9 [REDACTED], COUNSEL

10 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

11 [REDACTED], PROFESSIONAL STAFF MEMBER

12 [REDACTED] MINORITY COUNSEL

13 [REDACTED] MINORITY CHIEF COUNSEL AND SENIOR ADVISOR

14 [REDACTED] MINORITY SENIOR COUNSEL

15
16 For the COMMITTEE ON HOUSE ADMINISTRATION:

17
18 [REDACTED] DEPUTY GENERAL COUNSEL

19 [REDACTED] MINORITY CHIEF COUNSEL

20 [REDACTED] MINORITY POLICY DIRECTOR

21
22 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

23
24 [REDACTED] DEPUTY STAFF DIRECTOR

25 [REDACTED] MINORITY COUNSEL

1 For THE WITNESS:

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3 MATT M. GRAVES, ESQ.

4 TRAELOH T. RODGERS, ESQ.

5 WINSTON TAYLOR

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

2 Good morning.

3 This is a deposition of Ms. Kraal.

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

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

11 The chairmen requested a deposition with Ms. Kraal. On August 19th, 2026, the committee
12 issued subpoenas for an appearance at a deposition today, August 24th. I've marked the
13 August 19th subpoena as exhibit number 1.

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

16 [REDACTED] On August 19th, the committees noticed today's deposition, and I've marked
17 the August 19th notice as exhibit number 2.

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

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

21 The Witness. Muthoni Wambu Kraal.

22 [REDACTED] Could counsel please state your names for the record?

23 Mr. Graves. Matt Graves.

24 Mr. Rodgers. Traelon Rodgers.

25 [REDACTED] My name is [REDACTED] and I'm with Chairman Jordan's staff. I'll now

1 have everyone else from the committees who are here in the room introduce 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] House Oversight, minority.

7 [REDACTED] [REDACTED] Ranking Member Morelle.

8 [REDACTED] [REDACTED] Ranking Member Raskin.

9 [REDACTED] [REDACTED] Ranking Member Raskin.

10 [REDACTED] [REDACTED] with Chairman Jordan's staff.

11 [REDACTED] [REDACTED] with Chairman Jordan's staff.

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

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

15 The committees will conduct today's deposition in accordance with the House's regulation for
16 the use of deposition authority, which has been provided in advance to your counsel.

17 Our questioning will proceed in rounds. The majority will ask questions first for 1 hour, and
18 the minority will have an opportunity to ask questions for an equal period of time if they choose.

19 There will be two staff counsel per side asking the questions. To the extent members come
20 today and they have questions for the witness, they'll be propounded during their side's respective
21 rounds.

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

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

25 We ordinarily take a short break at the end of each hour, but if you'd like to take a break

1 apart from that, please just let us know.

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

4 Do you understand?

5 The Witness. I do.

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

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

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

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

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

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

21 Do you understand that?

22 The Witness. I do.

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

24 Do you understand this?

25 The Witness. I do.

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

4 Do you understand this?

5 The Witness. I do.

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

9 Do you understand this?

10 The Witness. I do.

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

13 The Witness. No.

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

18 Finally, I'll make note for the staff here today that the content of what we discuss is
19 confidential. And under the House deposition regulations, under the rules, the chairman and
20 ranking minority member shall consult before any release of testimony transcripts, including portions
21 thereof. This means it is a violation of House and committee rules to disclose content of the
22 deposition prior to its official release.

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

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

3 [REDACTED] Nothing from us. Thanks.

4 [REDACTED] Mr. Graves?

5 Mr. Graves. Thank you.

6 Two months ago, the committees reached out to my client for the first time concerning this
7 investigation.

8 Mrs. Wambu Kraal has a great deal of respect for this institution, is proud of ActBlue, and
9 under normal circumstances would not have any qualms in discussing ActBlue with you. In fact, she
10 has cooperated with your investigation just as ActBlue and others affiliated with the organization
11 have done.

12 But we are not operating under normal circumstances. There have been repeated
13 suggestions from public officials that criminal conduct occurred at ActBlue, including in April 2025 the
14 President directed the Attorney General to investigate ActBlue citing the committees' investigation;
15 committee chairmen pledged to collaborate with the Attorney General in any criminal investigation
16 of ActBlue; committee chairmen asked several State attorneys general to investigate, quote,
17 "potential criminal activity," unquote, relating to ActBlue's fundraising activities, leading to
18 investigations that ActBlue immediately responded to; and there have been recent suggestions from
19 committee chairmen that ActBlue's board also participated in this alleged misconduct.

20 Our understanding is that there is substantial overlap between the matters you would like to
21 discuss and the issues referenced in these public statements. Under these circumstances, I have
22 advised Mrs. Wambu Kraal that she should invoke her rights under the Fifth Amendment, and she
23 intends to follow my advice.

24 While I believe these claims of illegal conduct to be baseless, we have no choice but to take
25 them very seriously given the powerful roles of the people making these claims.

1 It's a bedrock principle that an invocation of one's Fifth Amendment rights is in no way an
2 admission of wrongdoing, and that is certainly the case here. The Fifth Amendment is designed to
3 protect innocent people against unfounded prosecutions.

4 Finally, based on our understanding of the issues the committee wants to discuss, some
5 questions today will call for attorney-client-privileged communication or other information subject to
6 privileges belonging to ActBlue.

7 Nothing Mrs. Wambu Kraal does or says should be deemed to waive that privilege, which
8 belongs to ActBlue and which Mrs. Kraal lacks authority to waive.

9 Thank you.

10 [REDACTED] Thank you.

11 The court reporter will now swear the witness in.

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

14 The Witness. I do.

15 The Reporter. Thank you.

16 [REDACTED] The clock now reads 10:08. We will start the first hour of questioning.

EXAMINATION

Q Ms. Wambu Kraal, how long have you served on the board of ActBlue?

A On the advice of counsel, I respectfully decline to answer based upon my rights under the Fifth Amendment of the Constitution.

Q Why is ActBlue so bad at stopping fraudulent donations?

A On the advice of counsel, I respectfully decline to answer based upon my rights under the Fifth Amendment of the Constitution.

Q Can you help us understand why ActBlue reviews so many fewer transactions for fraud than an ordinary website selling physical goods?

A On the advice of counsel, I respectfully decline to answer based upon my rights under the Fifth Amendment of the Constitution.

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

A On the advice of counsel, I respectfully decline to answer based upon my rights under the Fifth Amendment of the Constitution.

Q Did the board have any awareness that the 2024 goals of ActBlue's top fraud specialists included allowing more fraud on ActBlue?

A On the advice of counsel, I respectfully decline to answer based upon my rights under the Fifth Amendment of the Constitution.

Q Did the board know that ActBlue took a, quote, "more lenient approach" to fraud in 2024?

A On the advice of counsel, I respectfully decline to answer based upon my rights under the Fifth Amendment of the Constitution.

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

2 A On the advice of counsel, I respectfully decline to answer based upon my rights under
3 the Fifth Amendment of the Constitution.

4 Q Have ActBlue executives or board members ever instructed ActBlue employees to allow
5 more fraud on the platform or weaken ActBlue's fraud prevention defenses?

6 A On the advice of counsel, I respectfully decline to answer based upon my rights under
7 the Fifth Amendment of the Constitution.

8 Q And how many fraud campaigns have been conducted on ActBlue that used gift cards or
9 prepaid cards?

10 A On the advice of counsel, I respectfully decline to answer based upon my rights under
11 the Fifth Amendment of the Constitution.

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

13 A On the advice of counsel, I respectfully decline to answer based upon my rights under
14 the Fifth Amendment of the Constitution.

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

17 A On the advice of counsel, I respectfully decline to answer based upon my rights under
18 the Fifth Amendment of the Constitution.

19 Q How often does ActBlue weaken its fraud prevention standards?

20 A On the advice of counsel, I respectfully decline to answer based upon my rights under
21 the Fifth Amendment of the Constitution.

22 Q Did ActBlue CEO Ms. Regina Wallace-Jones lie to Congress?

23 A On the advice of counsel, I respectfully decline to answer based upon my rights under
24 the Fifth Amendment of the Constitution.

25 Q Why does ActBlue refuse to verify the U.S. passport information for foreign

1 contributions?

2 A On the advice of counsel, I respectfully decline to answer based upon my rights under
3 the Fifth Amendment of the Constitution.

4 Q Why did ActBlue accept up to 38 million in donations with foreign indicators during the
5 2024 election cycle?

6 A On the advice of counsel, I respectfully decline to answer based upon my rights under
7 the Fifth Amendment of the Constitution.

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

10 A On the advice of counsel, I respectfully decline to answer based upon my rights under
11 the Fifth Amendment of the Constitution.

12 Q Does the board have any awareness as to why the whole legal and compliance team left
13 ActBlue following the 2024 election?

14 A On the advice of counsel, I respectfully decline to answer based upon my rights under
15 the Fifth Amendment of the Constitution.

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

20 A On the advice of counsel, I respectfully decline to answer based upon my rights under
21 the Fifth Amendment of the Constitution.

22 Q Why was ActBlue leadership not fully committed to transparently addressing with the
23 board the seriousness of ActBlue's misconduct?

24 A On the advice of counsel, I respectfully decline to answer based upon my rights under
25 the Fifth Amendment of the Constitution.

1 Q And do you know why Ms. Wallace-Jones told ActBlue's outside counsel Dana Remus
2 and executives on a video call in February 2025 that she refused to let them go to the board with
3 information about ActBlue's potential legal vulnerability?

4 A On the advice of counsel, I respectfully decline to answer based upon my rights under
5 the Fifth Amendment of the Constitution.

6 Q And did the board provide any guidance or have any awareness as to whether ActBlue
7 took steps to address the concerns in the memoranda that Covington produced?

8 A On the advice of counsel, I respectfully decline to answer based upon my rights under
9 the Fifth Amendment of the Constitution.

10 [REDACTED] Thank you. We can go off the record.

11 [Discussion off the record.]

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

13 Ms. Kraal, good morning. My name is [REDACTED] I'm a senior counsel on the House
14 Judiciary Committee. I'm joined here by my colleagues on the House Administration Committee
15 and the House Oversight Committee for the Democrats.

16 I would like to introduce several exhibits for the record.

17 [Kraal Exhibit No. 3

18 was marked for identification.]

19 [REDACTED] First, I would like to introduce President Donald Trump's executive order on
20 April 24th, 2025, entitled, quote, "Investigation Into Unlawful 'Straw Donor' and Foreign
21 Contributions in American Elections," end quote, directing the Department of Justice to investigate
22 ActBlue.

23 [Kraal Exhibit No. 4

24 was marked for identification.]

25 [REDACTED] Second, I would like to introduce as -- and I believe this will be exhibit 4 -- an

1 Associated Press article entitled "Trump wants an investigation of Democrats' fundraising. His own
2 campaign has issues," detailing how President Trump's campaign accepted donations, many through
3 the Republican fundraising platform WinRed, including, quote, "1,600 contributions from donors who
4 live abroad, have close ties to foreign interests or failed to disclose basic information," end quote,
5 including a Chinese businessman using a La Quinta Inn as his home address.

6 [Kraal Exhibit No. 5

7 was marked for identification.]

8 [REDACTED] Third, I would like to introduce as an exhibit a 2024 CNN article entitled, "How
9 elderly dementia patients are unwittingly fueling political campaigns," an article which details how
10 the Federal Trade Commission received more than 800 complaints about the Republican donation
11 platform WinRed. This is nearly seven times more complaints than the Commission received about
12 ActBlue.

13 [Kraal Exhibit No. 6

14 was marked for identification.]

15 [REDACTED] Fourth, I would like to introduce as an exhibit a letter from the ranking members
16 of the Judiciary, Oversight, and House Administration Committees, Mr. Raskin, Mr. Garcia, and
17 Mr. Morelle, to WinRed detailing our concerns about foreign donations and consumer fraud and
18 seeking WinRed's voluntary cooperation to provide information in order to help Congress improve
19 campaign finance laws.

20 [Kraal Exhibit No. 7

21 was marked for identification.]

22 [REDACTED] Next, I would like to introduce as an exhibit an email from WinRed's counsel and
23 letter, Nadin Linthorst at Lex Politica declined to cooperate with our inquiry, and stating that the
24 ranking members' requests, which are far less broad than the majority's requests to ActBlue and
25 cover far more significant reports of wrongdoing, as, quote, "overbroad, unduly burdensome,

1 disproportionate, and not reasonably tailored to any legitimate legislative or oversight purpose."

2 [Kraal Exhibit No. 8

3 was marked for identification.]

4 [REDACTED] Finally, I would like to introduce as an exhibit a letter from Ranking Members
5 Raskin, Garcia, and Morelle to Attorney General Paxton seeking records of these individuals who
6 were defrauded by WinRed. As with his constituents, who complained to his office about fraud on
7 WinRed, Mr. Paxton failed to respond to that congressional oversight request.

8 I'd like to end by noting that fraud and foreign influence in our elections is worthy of serious
9 investigation. But the majority's selective approach, which ignores a far more problematic platform
10 to investigate President Trump's political enemies, is not serious.

11 This investigation and these depositions appear to be part and parcel of President Trump's
12 relentless attack on his political opponents and his effort to undermine the integrity of our elections
13 and our democracy.

14 We'll go off the record.

15 [Whereupon, at 10:17 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