

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

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

DEPOSITION OF: KIMBERLY PEELER-ALLEN

Tuesday, September 1, 2026

Washington, D.C.

The deposition in the above matter was held in room 2237, commencing at 10:00 a.m.
Present: Jordan, Steil, Foxx, and Higgins.

1 Appearances:

5 For the COMMITTEE ON THE JUDICIARY:

7 [REDACTED], GENERAL COUNSEL

8 [REDACTED], DEPUTY GENERAL COUNSEL

9 [REDACTED], COUNSEL

10 [REDACTED], PROFESSIONAL STAFF MEMBER

11 [REDACTED], DIGITAL DIRECTOR

12 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

13 [REDACTED], COUNSEL

14 [REDACTED], PROFESSIONAL STAFF MEMBER

15 [REDACTED] MINORITY COUNSEL

16 [REDACTED] MINORITY CHIEF COUNSEL AND SENIOR ADVISOR

17 [REDACTED], MINORITY FELLOW

18 [REDACTED], MINORITY SENIOR COUNSEL

21 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

23 [REDACTED], DEPUTY STAFF DIRECTOR

24 [REDACTED], SENIOR ADVISOR

25 [REDACTED], MINORITY COUNSEL

1 For the COMMITTEE ON HOUSE ADMINISTRATION:

2

3 [REDACTED], DEPUTY GENERAL COUNSEL

4 [REDACTED], GENERAL COUNSEL

5 [REDACTED], MINORITY STAFF

6 [REDACTED], MINORITY ELECTIONS COUNSEL

7

8

9 For KIMBERLY PEELER-ALLEN:

10

11 MATT GRAVES

12 ANNETTE MACKINNON

13

14

15

16

17

18

19

20

21

22

23

24

25

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

2 Good morning. This is a deposition of Ms. Kimberly Peeler-Allen. The Committee on
3 House Administration, the Committee on the Judiciary, and the Committee on Oversight and
4 Government Reform are charged with upholding fundamental American civil liberties and protecting
5 the integrity of American elections. In light of allegations that online fundraising platforms that
6 service conduits for political donations have accepted fraudulent donations from domestic and
7 foreign sources, the committees are conducting oversight to inform potential legislative reforms.

8 To further the committees' oversight on legislative reforms, the chairmen requested a
9 deposition with Ms. Peeler-Allen. On August 26th, 2026, the committees issued subpoenas for Ms.
10 Peeler-Allen to appear at a deposition today, September 1st. I've marked the August 26th
11 subpoena as exhibit No. 1.

12 [Peeler-Allen Exhibit No. 1
13 was marked for identification.]

14 [REDACTED]: On that same day the committees noticed today's deposition, and I've marked
15 the notice as exhibit No. 2.

16 [Peeler-Allen Exhibit No. 2
17 was marked for identification.]

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

19 The Witness. Kimberly Peeler-Allen.

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

21 Mr. Graves. Matt Graves.

22 Ms. MacKinnon. Annette MacKinnon.

23 [REDACTED]: My name is [REDACTED], and I'm with Chairman Jordan's staff. I'll now
24 have everyone else from the committees and Members who are here introduce themselves as well.

25 Mr. Steil. Congressman Bryan Steil, chairman of the House Administration Committee.

1 [REDACTED] [REDACTED] with Mr. Jordan's staff.
2 [REDACTED] [REDACTED], Ranking Member Raskin's staff.
3 [REDACTED] [REDACTED], Ranking Member Morelle.
4 [REDACTED] [REDACTED], Ranking Member Garcia's staff.
5 [REDACTED] [REDACTED], Ranking Member Raskin's staff.
6 [REDACTED] [REDACTED] with Chairman Comer.
7 [REDACTED] [REDACTED] with Chairman Steil.
8 [REDACTED] [REDACTED] with Chairman Steil.
9 [REDACTED] [REDACTED] with Chairman Jordan.
10 [REDACTED] [REDACTED] with Chairman Jordan.
11 [REDACTED] [REDACTED] with Chairman Jordan.
12 [REDACTED] [REDACTED] with Chairman Jordan.
13 [REDACTED] [REDACTED] with Chairman Jordan.
14 [REDACTED] [REDACTED] with Ranking Member Morelle.
15 [REDACTED] [REDACTED] with Chairman Comer.
16 [REDACTED] [REDACTED] Ranking Member Raskin's staff.
17 [REDACTED] [REDACTED] Chairman Jordan's staff.
18 [REDACTED] I'll now review the ground rules and guidelines that we'll follow during today's
19 deposition.

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

22 Our questioning will proceed in rounds. The majority will ask questions first for 1 hour, and
23 then the minority will have an opportunity to ask questions for an equal period of time if they
24 choose. There will be two staff counsel per side asking the questions. To the extent Members
25 have questions for the witness, they will be propounded during their side's respective rounds.

1 The clock will stop if the witness needs to confer with counsel, when counsel for the witness
2 is speaking, and when Members are speaking during the opposite side's round. We'll alternate back
3 and forth until there are no more questions and the deposition is over.

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

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

8 The Witness. I do.

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

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

15 We want you to answer our questions in a complete and truthful manner. If you do not
16 understand one of our questions or need clarification about what we are seeking, please let us know.
17 If you do not know the answer to a question or do not remember, please tell us what you do know
18 and remember. It is okay to tell us if you learned information from someone else, just indicate how
19 you came to know that information.

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

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

25 The Witness. I do.

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

3 The Witness. I do.

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

7 The Witness. I do.

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

12 The Witness. I do.

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

15 The Witness. No.

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

20 Finally, I will make note for the Members and staff here today that the content of what we
21 discuss here today is confidential under the House deposition regulations. Under the rules, the
22 chairmen and ranking minority members shall consult before any release of testimony, transcripts,
23 including portions thereof. This means it is a violation of House and committee rules to disclose
24 content of the deposition prior to its official release.

25 For this reason, the marked exhibits that we will use today will remain with the court reporter

1 so that they can go in the official transcript, and any copies of those exhibits will be returned to us
2 when we wrap up.

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

5 [REDACTED] Nothing from us. Thanks.

6 [REDACTED] Mr. Graves?

7 Mr. Graves. Thank you.

8 A couple months ago, the committees reached out to my client for the first time concerning
9 this investigation. Ms. Peeler-Allen has a great deal of respect for this institution, is proud of
10 ActBlue, and under normal circumstances would not have any qualms in discussing ActBlue with you.
11 In fact, she has cooperated with your investigation, just as ActBlue and others affiliated with the
12 organization have done, but we are not operating under normal circumstances.

13 There have been repeated suggestions from public officials that criminal conduct occurred at
14 ActBlue, including in April 2025, the President directed the Attorney General to investigate ActBlue,
15 citing the committees' investigation. The committee chairmen pledged to collaborate with the
16 Attorney General in any criminal investigation of ActBlue. Committee chairmen asked several state
17 attorneys general to investigate potential criminal activity relating to ActBlue's fundraising activities
18 leading to investigations that ActBlue immediately responded to. And there have been recent
19 suggestions from committee chairmen that ActBlue's board also participated in 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've
22 advised Ms. Peeler-Allen 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 communications or other information subject
6 to privileges belonging to ActBlue. Nothing Ms. Peeler-Allen does or says should be deemed to
7 waive that privilege which belongs to ActBlue and which Ms. Peeler-Allen lacks authority to waive.

8 Thank you.

9 [REDACTED] The court reporter will now swear the witness in.

10 The Reporter. Do you solemnly declare and affirm under penalty of perjury that the
11 testimony you're about to give will be the truth, the whole truth, and nothing but the truth?

12 The Witness. I do.

13 The Reporter. Thank you.

14 [REDACTED] The clock now reads 10:07 a.m. We'll start the first hour of questioning.

15 EXAMINATION

16 [REDACTED]
17 Q Ms. Peeler-Allen, how long have you served as the chair of the board of ActBlue?

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

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

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

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

25 A On the advice of counsel, I respectfully decline to answer based upon my rights under

1 the Fifth Amendment of the Constitution.

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

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 Why did the 2024 goals of ActBlue's top fraud specialists include allowing more fraud on
7 the platform?

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 Q Why did ActBlue take a, quote, "more lenient approach," end quote, to fraud in 2024?

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

13 Q Did ActBlue and its board make a concerted effort to allow more fraud on the platform
14 in 2024?

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

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

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

21 Q How many fraud campaigns have been conducted on ActBlue that use gift cards or
22 prepaid cards?

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 did ActBlue exempt recurring donations from the CVV requirement?

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

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

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

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

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 Q Did ActBlue's CEO, Ms. Wallace-Jones, lie to Congress?

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

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

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

17 Q And how did you learn that up to 38 million or 1 percent of all donations on ActBlue had
18 indicators that they were foreign contributions?

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

21 Q Do you stand by that statement that you gave to The New York Times?

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

24 Q Why did ActBlue accept up to 38 million in donations with foreign indicators during the
25 2024 election cycle?

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

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

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

7 Q Was the board ever told why the whole legal and compliance team left ActBlue
8 following the 2024 election?

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

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

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

17 Q Did it concern you that Mr. Ting said in his resignation letter that ActBlue leadership
18 was, quote, not fully committed to transparently addressing with the board the seriousness of
19 ActBlue's misconduct?

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 you ever learn why Ms. Wallace-Jones told ActBlue's outside counsel and executives
23 on a video call that she, quote, refused to let the board know or go to the board with information
24 about ActBlue's potential legal vulnerability?

25 A On the advice of counsel, I respectfully decline to answer based upon my rights under

1 the Fifth Amendment of the Constitution.

2 Q And did ActBlue ever take steps to address the concerns in the Covington memoranda
3 that were produced by Dana Remus?

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 [REDACTED] Any questions?

7 Mr. Steil. None from me.

8 [REDACTED] Dr. Foxx, any questions? Go ahead.

9 Ms. Foxx. Why doesn't ActBlue cooperate with investigations by financial institutions whose
10 customers have been defrauded by criminals using the ActBlue platform to test stolen credit cards?

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

13 Ms. Foxx. Does ActBlue not want these fraudsters brought to justice because it benefits
14 from the fraud?

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

17 [REDACTED] We can go off the record.

18 [Discussion off the record.]

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

20 My name is [REDACTED] I'm a senior counsel on the House Judiciary Committee working for
21 Ranking Member Raskin, and along with my minority colleagues from House Administration and
22 House Oversight, I would like to introduce several exhibits for the record.

23 First, I would like to introduce as exhibit 3 President Trump's April 24, 2025, executive order
24 entitled, quote, "Investigation into Unlawful Straw Donor and Foreign Contributions in American
25 Elections," end quote, directing the Department of Justice to investigate ActBlue.

1 [Peeler-Allen Exhibit No. 3

2 was marked for identification.]

3 [REDACTED] Second, I would like to introduce as exhibit 4 an Associated Press article entitled,
4 quote, "Trump wants an investigation of Democrats' fundraising. His own campaign has issues,"
5 end quote, detailing how President Trump's campaign accepted illegal donations, many through the
6 Republican fundraising platform WinRed. These included, quote, "1600 contributions from donors
7 who live abroad have close ties to foreign interests or failed to disclose basic information," end
8 quote, including a Chinese businessman using a La Quinta Inn as his home address.

9 [Peeler-Allen Exhibit No. 4

10 was marked for identification.]

11 [REDACTED] Third, I would like to introduce as exhibit 5 a 2024 CNN article entitled, quote,
12 "How elderly dementia patients are unwittingly fueling political campaigns," end quote, which details
13 how the Federal Trade Commission received more than 800 complaints about the Republican
14 donation platform WinRed.

15 During this time period, the Commission received nearly seven times more complaints about
16 WinRed than it did about ActBlue.

17 [Peeler-Allen Exhibit No. 5

18 was marked for identification.]

19 [REDACTED] Fourth, I would like to introduce as exhibit 6 a letter from the ranking members of
20 the Judiciary, Oversight, and House Administration Committees, Mr. Raskin, Mr. Garcia, and
21 Mr. Morelle, to WinRed detailing concerns about foreign donations and consumer fraud on the
22 platform and seeking WinRed's voluntary cooperation in order to help Congress improve campaign
23 finance laws.

24 [Peeler-Allen Exhibit No. 6

25 was marked for identification.]

1 [REDACTED] Fifth, I would like to introduce as exhibit 7 an email from WinRed's counsel, Nadin
2 Linthorst at Lex Politica, declining to cooperate with the ranking members' inquiry and stating that
3 the ranking members' requests, which are far less broad than the majority's request to ActBlue and
4 cover far more significant reports of wrongdoing, were quote, "overbroad, unduly burdensome,
5 disproportionate, and not reasonably related -- excuse me -- not reasonably tailored to any
6 legitimate legislative or oversight purpose."

7 [Peeler-Allen Exhibit No. 7

8 was marked for identification.]

9 [REDACTED] Fifth, I would like to introduce as exhibit 8 a letter from Ranking Members Raskin,
10 Garcia, and Morelle to Attorney General Paxton seeking records of the numerous Republican voters
11 in Texas who were defrauded by WinRed. As with his constituents who complained to his office
12 about fraud on WinRed, Mr. Paxton failed to respond to this inquiry.

13 [Peeler-Allen Exhibit No. 8

14 was marked for identification.]

15 [REDACTED] Fraud and foreign influence in our elections are worthy of serious investigation,
16 but the majority's selective approach, which ignores a far more problematic platform to investigate
17 President Trump's political enemies, is not serious. This investigation and these depositions appear
18 to be part and parcel of President Trump's relentless attack on his political opponents and his effort
19 to undermine the integrity of our elections and our democracy.

20 We'll go off the record.

21 [Whereupon, at 10:18 a.m., the deposition was adjourned.]

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