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

DEPOSITION OF: ZAIN AHMAD

Friday, December 5, 2025

Washington, D.C.

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

1 Appearances:

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4

5 For the COMMITTEE ON THE JUDICIARY:

6

7 [REDACTED], DEPUTY GENERAL COUNSEL

8 [REDACTED], PROFESSIONAL STAFF MEMBER

9 [REDACTED], DIGITAL DIRECTOR

10 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

11 [REDACTED], PROFESSIONAL STAFF MEMBER

12 [REDACTED], MINORITY SPECIAL COUNSEL

13 FOR INVESTIGATIONS AND SENIOR ADVISOR

14 [REDACTED], MINORITY FELLOW

15 [REDACTED], MINORITY LEGAL INTERN

16 [REDACTED], MINORITY INTERN

17

18 For the COMMITTEE ON HOUSE ADMINISTRATION:

19 [REDACTED], COUNSEL

20 [REDACTED], MINORITY CHIEF COUNSEL

21 [REDACTED], MINORITY COUNSEL

22

1 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

2

3 [REDACTED], CHIEF COUNSEL FOR OVERSIGHT

4 [REDACTED], SENIOR COUNSEL

5 [REDACTED], COUNSEL

6 [REDACTED], MINORITY LEGAL INTERN

7 [REDACTED], MINORITY DEPUTY CHIEF COUNSEL

8 [REDACTED], MINORITY COUNSEL

9

10 ALSO PRESENT:

11

12 [REDACTED], LEGISLATIVE ASSISTANT TO REPRESENTATIVE BIGGS

13

14

15 For ZAIN AHMAD:

16

17 DANNY C. ONORATO, ESQ.

18 TARA N. TIGHE, ESQ.

19 Schertler, Onorato, Mead & Sears, LLP

20 555 13th Street NW, Suite 500 West

21 Washington, D.C. 20004

22

23

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25

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

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

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

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

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

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

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

21 Mr. Ahmad. Zain Ahmad.

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

23 Mr. Onorato. Danny Onorato.

24 Ms. Tighe. Good morning. Tara Tighe.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

11 Mr. Ahmad. I understand.

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

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

25 Mr. Ahmad. I understand.

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

3 Mr. Ahmad. I understand.

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

7 Mr. Ahmad. I understand.

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

12 Mr. Ahmad. I understand.

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

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

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

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

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

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

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

11 Mr. Ahmad. Thank you.

12 [REDACTED]: Mr. Onorato.

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

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

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

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

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

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

19 [Witness sworn.]

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

22 EXAMINATION

23 BY [REDACTED]:

24 Q What were your job responsibilities at ActBlue?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 opening statement that we heard from your attorney.

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

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

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

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

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

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

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

4 ██████████. Thank you, Mr. Ahmad. We don't have any additional questions.

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

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

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

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

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

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

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

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Certificate of Deponent/Interviewee

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

Witness Name

Date

Transcribed Interview Transcript Errata Form

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

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