

**Congress of the United States**  
**Washington, DC 20515**

March 27, 2018

Dr. Alexander Tayler  
Acting Chief Executive Officer  
Cambridge Analytica  
1901 Pennsylvania Ave NW, Suite 902  
Washington, DC 20006

Dear Dr. Tayler:

We are writing to you regarding recent news reports that Cambridge Analytica may have violated U.S. election regulations that prohibit high-level strategy or analysis work by foreign nationals in a U.S. political campaign.

On Sunday, the *Washington Post* reported that three former employees of the firm stated that “Cambridge Analytica assigned dozens of non-U.S. citizens to provide campaign strategy and messaging advice to Republican candidates in 2014.”<sup>1</sup> In 2014, Cambridge Analytica reportedly was “overwhelmingly staffed by non U.S. citizens.” At least 20 of those employees worked in the United States on legislative and congressional campaigns, and had involvement in “helping to decide what voters to target with political messages and what messages to deliver to them.”<sup>2</sup>

If true, these activities appear to violate a Federal Election Commission regulation that prohibits the participation of foreign nationals in “decisions involving election-related activities.” In relevant part, that regulation provides:

A foreign national shall not direct, dictate, control, or directly or indirectly participate in the decision-making process of any person, such as a corporation, labor organization, political committee, or political organization with regard to such person’s Federal or non-Federal election-related activities, such as decisions concerning the making of contributions, donations, expenditures, or disbursements in connection with elections for any Federal, State, or local office or decisions concerning the administration of a political committee.<sup>3</sup>

In fact, Cambridge Analytica was reportedly provided with a 10-page memorandum by an attorney that cited this regulation, and elaborated on the restrictions on foreign nationals’

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<sup>1</sup> *Former Cambridge Analytica Workers Say Firm Sent Foreigners to Advise U.S. Campaigns*, Washington Post (Mar. 25, 2018) (online at [www.washingtonpost.com/politics/former-cambridge-analytica-workers-say-firm-sent-foreigners-to-advise-us-campaigns/2018/03/25/6a0d7d90-2fa2-11e8-911f-ca7f68bfff0fc\\_story.html](http://www.washingtonpost.com/politics/former-cambridge-analytica-workers-say-firm-sent-foreigners-to-advise-us-campaigns/2018/03/25/6a0d7d90-2fa2-11e8-911f-ca7f68bfff0fc_story.html)).

<sup>2</sup> *Id.*

<sup>3</sup> 11 C.F.R. §110.20 (2004).

participation in U.S. elections. The memorandum reportedly advised that “foreign nationals could serve in minor roles — for example as ‘functionaries’ handling data — but could not involve themselves in significant campaign decisions or provide high-level analysis or strategy.”<sup>4</sup>

Despite these warnings, the firm reportedly gave its foreign national employees inaccurate immigration documents “showing that they were not there to work when they had arrived for the purpose of advising campaigns.”<sup>5</sup>

### **Request for Information**

In order to evaluate the accuracy of these allegations, whether Cambridge Analytica violated U.S. election regulations, and, if so, who was aware of those violations, we request that you provide, by April 10, 2018, the following documents and information:

- (1) all documents and communications referring or relating to the work of foreign nationals, whether independent contractors or employees of Cambridge Analytica, in any U.S. election, from January 1, 2014 to the present, including, but not limited to:
  - a. work on behalf of, or for, the campaign of Senator Thom Tillis or the North Carolina Republican Party;
  - b. work on behalf of, or for, the presidential campaign of Senator Ted Cruz;
  - c. work on behalf of, or for, the presidential campaign of Donald J. Trump; and
  - d. work on behalf of, or for, the John Bolton Super PAC;
- (2) all documents and communications referring or relating to the legality of Cambridge Analytica’s work in the United States, including any documents and communications referring or relating to Cambridge Analytica’s compliance with 11 C.F.R. §110.20, from January 1, 2014 to the present;
- (3) all documents and communications referring or relating to Cambridge Analytica’s immigration documents for foreign employees entering the United States, from January 1, 2014 to the present;
- (4) all documents and communications referring or relating to representations by Cambridge Analytica regarding the work of foreign nationals on U.S. elections or campaigns, from January 1, 2014 to the present.

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<sup>4</sup> *Former Cambridge Analytica Workers Say Firm Sent Foreigners to Advise U.S. Campaigns*, Washington Post (Mar. 25, 2018) (online at [www.washingtonpost.com/politics/former-cambridge-analytica-workers-say-firm-sent-foreigners-to-advise-us-campaigns/2018/03/25/6a0d7d90-2fa2-11e8-911f-ca7f68bff0fc\\_story.html](http://www.washingtonpost.com/politics/former-cambridge-analytica-workers-say-firm-sent-foreigners-to-advise-us-campaigns/2018/03/25/6a0d7d90-2fa2-11e8-911f-ca7f68bff0fc_story.html)).

<sup>5</sup> *Id.*

Sincerely,



Elijah E. Cummings  
Ranking Member  
Committee on Oversight and  
Government Reform



Jerrold Nadler  
Ranking Member  
Committee on the Judiciary

cc: The Honorable Trey Gowdy, Chairman  
Committee on Oversight and Government Reform

The Honorable Bob Goodlatte, Chairman  
Committee on the Judiciary