

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

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<https://oversight.house.gov>

November 18, 2025

Mr. Allan Williams
CEO
Sunflower Services
1828 L St. NW
Washington, DC 20036

Dear Mr. Williams:

The Committee on Oversight and Government Reform works to uphold fundamental American civil liberties and protect the integrity of American elections. To this end, we are investigating reports of new activities by Sixteen Thirty Fund—an entity with books that have long been in the care of Arabella Advisors.¹ Sunflower Services has announced its acquisition of Arabella Advisors.² Sixteen Thirty Fund has reportedly attempted to circumvent campaign finance disclosure requirements enforced by the Federal Election Commission (FEC) and the Department of Justice (DOJ) as well as media ethics norms that help distinguish activities of legitimate journalists from campaign operatives whose paid activity requires disclosure.³ The Committee seeks documents in the possession of your organization as part of this oversight.

According to *Wired*, the Chorus Creator Incubator Program (Chorus) was recently launched by Sixteen Thirty Fund, which it describes as a “powerful liberal dark money group.”⁴ Invited participants in Chorus receive up to \$8,000 per month for bolstering Democratic messaging on the internet but are required to sign contracts mandating “extensive secrecy about disclosing their payments and had restrictions on what sort of political content the creators could produce.”⁵ Chorus participants claim the contract “stipulated they’d be kicked out and essentially cut off financially if they even so much as acknowledged that they were part of the program.” *Wired* reported that contracts required participants to funnel “all bookings with lawmakers and political leaders through Chorus” and are “not allowed to use any funds or resources that they receive as part of the program to make content that supports or opposes any political candidate or campaign without express authorization from Chorus in advance and in writing, per the

¹ Sixteen Thirty Fund 2023 *Public Disclosure Copy Forms* 8868 & 990, Sixteen Thirty Fund available at <https://www.sixteenthirtyfund.org/wp-content/uploads/2024/11/2023-Sixteen-Thirty-Fund-Form-990-Public-Disclosure-Copy-bnJAVgQYKTxcQpgdwdYN.pdf> (last accessed September 15, 2025).

² Sunflower Services *We’re proud to announce the launch of Sunflower Services*, Sunflower Services available at <https://sunflowerservicespb.com/> (last accessed November 18, 2025).

³ Taylor Lorenz, *A Dark Money Group Is Secretly Funding High-Profile Democratic Influencers*, WIRED (Aug. 27, 2025).

⁴ *Id.*

⁵ *Id.*

contract.” Another observer noted how Chorus’ secretive and controlling arrangements stand out as “other groups like Turning Point USA would come in with their influencer affiliate program, be pretty open about who they were funded by and what they did, and everyone was like, ‘Okay, sure, we’re chill with it.’”⁶

Reporting has also raised concerning information about the motivations and ethics of Chorus. Graham Wilson, who is identified as a lawyer working for Chorus reportedly explained perceived advantages of using a nonprofit entity in a Zoom call for invited Chorus participants stating, “[i]t gives us the ability to raise money from donors. It also, with this structure, it avoids a lot of the public disclosure or public disclaimers—you know, ‘Paid for by blah blah blah’—that you see on political ads. We don’t need to deal with any of that. Your names aren’t showing up on, like, reports filed with the FEC.”⁷ Elizabeth Dubois, an assistant professor at the University of Ottawa noted of Chorus, “[s]ometimes it is actually clear that influencers are being used to, for example, evade spending limits.”⁸ Don Heider, the chief executive of the Markkula Center for Applied Ethics at Santa Clara University, described ethical shortcomings of Chorus’ secrecy saying, “[i]f the contract for getting money from a particular interest group says you can’t disclose it, then it’s pretty simple, you can’t take the money.”⁹

As part of its investigation, and to inform legislation regarding compliance with and enforcement of campaign finance disclosure requirements, the Committee seeks documents and other information from your organization about Chorus, the requirements as well as inducements for participation, and information about all invited participants.

Specifically, the Committee requests the following documents and information acquired from Arabella Advisors covering the time period January 1, 2024, to the present, unless otherwise indicated, as soon as possible but no later than December 2, 2025:

1. All contracts, along with any addendum or related material—including but not limited to any confidentiality and/or non-disclosure agreement—signed by or offered to any individual or entity for participation in Chorus;
2. All requests for inclusion or information about participating in Chorus;
3. All documents and communications discussing Chorus contracts and any addendum or related material, decisions to offer or not offer contracts, or the negotiation of contractual agreements for or related to Chorus;
4. All documents and communications including any recordings, notes, minutes, or transcripts of meetings, video conferences, or calls related to the funding, creation,

⁶ Tina Nguyen, *How the Democrats keep copying the MAGA influencer playbook (and failing)*, THE VERGE (Sept. 2, 2025).

⁷ Lorenz, *supra* note 2.

⁸ *Id.*

⁹ *Id.*

launch, coordination, and activities of Chorus and its participants;

5. All documents describing staff and contractor job responsibilities for organizing or managing activities and/or funds as part of or relating to the Chorus project;
6. All slide decks and other marketing materials, including any drafts or prior versions thereof, created for fundraising that mention or describe the Chorus project;
7. All requests for changes to slide decks and other marketing materials created for fundraising that mention or describe the Chorus project;
8. All slide decks, planning materials, and communications, including any drafts or prior versions, used for the purpose of or that discuss recruitment efforts for Chorus;
9. All documents and communications—including any guidance or suggestions on messaging and possible topics—with parties who signed agreements or otherwise agreed to participate in the Chorus project;
10. All documents and communications related to Chorus' compliance or reporting obligations with federal and state laws including all FEC requirements;
11. All documents related to or describing the budget and financial resources of the Chorus project;
12. All documents referring to, or communications with, the following individuals or entities:
 - a. Stuart Perelmuter
 - b. Brian Tyler Cohen
 - c. Ellie Langford
 - d. Graham Wilson
 - e. Any employee or representative of Good Influence

The Committee on Oversight and Government Reform is the principal oversight committee of the U.S. House of Representatives and has broad authority to investigate “any matter” at “any time” under House Rule X. To arrange for delivery of documents or to ask any related follow up questions, please contact the Committee on Oversight and Government Reform Majority staff at (202) 225-5074. Thank you for your attention to this important matter.

Sincerely,


James Comer
Chairman

Mr. Allan Williams
November 18, 2025
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cc: The Honorable Robert Garcia, Ranking Member
Committee on Oversight and Government Reform