

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM
2157 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-6143

MAJORITY (202) 225-5074
MINORITY (202) 225-5051
<https://oversight.house.gov>

March 20, 2026

Mr. Graham Wilson
Founder
Creator Collective
250 Mass. Ave., NW
Suite 400
Washington, DC 20001

Dear Mr. Wilson:

The Committee on Oversight and Government Reform continues to investigate reports that Sixteen Thirty Fund, Arabella Advisors (now operating as Sunflower Services), and others have worked to circumvent federal campaign finance disclosure requirements and obscure the distinction between activities of legitimate journalists from campaign operatives.¹ During the course of our investigation, we have uncovered a disturbing pattern of activity that raises concerns about intentional efforts to mislead the public and shield the Chorus influencer program from scrutiny. The Committee seeks documents in your possession and the possession of organizations, including the Creator Collective and its subsidiaries or affiliates, as part of this oversight.

Scramble to get Chorus out of the Sixteen Thirty Fund after the Committee's inquiry

On November 18, 2025, the Committee sent inquiries to Sixteen Thirty Fund and Sunflower Services seeking documents related to Chorus, which the Committee understood to be operating not as an independent legal entity but as a project of Sixteen Thirty Fund with support from Arabella Advisors.² This appears to have instigated an organizational scramble around the Chorus project as three days later, on November 21, 2025, records with the Government of the District of Columbia (D.C.) show that you filed as founder of a new domestic nonprofit corporation called the Creator Collective.³ One month later, in a December 16, 2025 response to the Committee, Sixteen Thirty Fund confirmed that Chorus was merely a project of the Sixteen Thirty Fund, and specifically stated that Chorus is “not an independent legal entity.”⁴ The next

¹ Taylor Lorenz, *A Dark Money Group Is Secretly Funding High-Profile Democratic Influencers*, WIRED (Aug. 27, 2025), <https://www.wired.com/story/dark-money-group-secret-funding-democrat-influencers/>.

² *Comer Launches Investigation into Sixteen Thirty Fund's Reported Secretive Chorus Program, Effort to Evade Campaign Finance Laws*, COMM. ON OVERSIGHT AND GOV'T REFORM: PRESS RELEASES (Nov. 19, 2025).

³ Search for 'Creator Collective', DC DEP'T OF LICENSING AND CONSUMER PROT.: BUSINESS SEARCH <https://corponline.dlcp.dc.gov/homepage/business-info> (last visited Feb. 20, 2026).

⁴ Letter from Sixteen Thirty Fund to James Comer (Dec. 16, 2025) (on file with Comm. On Oversight And Gov't Reform).

day, on December 17, 2025, “Chorus” was registered with the D.C. Government as a trade name under the previously incorporated Creator Collective you had registered only days after the Committee’s first inquiry.⁵ Only on February 6, 2026, after Committee staff sought to verify the assertion that Chorus is not an independent legal entity, did a Sixteen Thirty Fund representative clarify that while the statement was true when the letter was sent, “[a]s of January 1, 2026, Chorus became inactive as a project of the Sixteen Thirty Fund.”⁶

Part of a disturbing pattern

The Committee finds the sequence and circumstances surrounding this change of control dubious at best. The opacity surrounding the legal separation between Chorus and the Sixteen Thirty Fund suggests efforts to conceal the change from the Committee and the public. Chorus’ legal status is materially relevant to the Committee’s investigation and the change is a significant departure from Sixteen Thirty Fund’s original response to the Committee’s November 18, 2025, inquiry.⁷ Furthermore, information about this change of legal status is not readily available to Chorus’ audiences: neither Chorus’ public website nor its social media channels disclose the change of control. The secrecy surrounding the change of control seems to be part of an effort to hide Chorus’ true leadership and mislead the public, which continues a disturbing pattern around the Chorus influencer program.

Chorus’ website misrepresents its true leadership

Chorus is a self-described “creator-led non profit program.”⁸ According to information on the company’s website, the program is founded by online creator Brian Tyler Cohen and an 11-person “Creator Council” of individuals who are listed as Chorus influencer participants on the website.⁹ According to legal registration documents filed with the D.C. Government, however, in addition to yourself, three directors who hold professional positions focused on state elections are the company’s organizational leaders.¹⁰

- Greg Speed – Former Director of Communications for the Democratic Congressional Campaign Committee (DCCC) and President of America Votes, and organization that describes one of its goals in coordinating the progressive community as to “win elections.”¹¹

⁵Search for ‘Creator Collective’, DC DEP’T OF LICENSING AND CONSUMER PROT.: BUSINESS SEARCH <https://corponline.dlcp.dc.gov/homepage/business-info> (last visited Feb. 20, 2026).

⁶ Email from Sixteen Thirty Fund, to Oversight Committee Maj. staff (Feb. 6, 2026) (on file with Comm. On Oversight And Gov’t Reform).

⁷ Letter from Sixteen Thirty Fund to James Comer (Nov. 17, 2025) (on file with Comm. On Oversight And Gov’t Reform).

⁸ *About Chorus*, CHORUS, <https://www.wearechorus.com/about> (last visited Feb. 20, 2026).

⁹ *MEET THE TEAM*, CHORUS <https://www.wearechorus.com/team> (last visited Feb. 20, 2026).

¹⁰ Search for ‘Creator Collective’, DC DEP’T OF LICENSING AND CONSUMER PROT.: BUSINESS SEARCH <https://corponline.dlcp.dc.gov/homepage/business-info> (last visited Feb. 20, 2026).

¹¹ *About*, AMERICA VOTES, <https://americavotes.org/about/> (last visited Feb. 24, 2026).

- Kim Rogers – President of Fund for States, an organization focused on developing partisan opposition research targeting candidates for state and local offices.¹²
- Eric Ming – Executive Director of State + Local Election Alliance, an organization that describes itself as a “center of gravity to win state and local elections.”¹³

Despite the assertions on the website, the Committee has yet to see evidence that Chorus’ contracted and compensated creators have any legal role or control over the program. At best, it seems the website’s description presents as a highly selective and misleading narrative of Chorus’ organizational history and current structure.

Withheld for Privacy

In addition to creating a misleading perception of the Chorus leadership, the Chorus entity has utilized a peculiar partnership to guard against disclosure of its legal structure and ownership to the public through its website registration. According to records of website registrations maintained by ICANN, *wearechorus.com* is registered by website registration company Withheld for Privacy.¹⁴ Withheld for Privacy, according to *The New York Times*, is based in Iceland and is known to be used by nefarious actors and others intending to hide information about website registrations.¹⁵ According to *The Times*, Withheld for Privacy clients include a website owned by a white supremacist group that sold counterfeit hormone drugs to trans-identifying individuals, fake news outlets run by Moscow-based former Florida Sheriff John Mark Dougan as part of Russian disinformation campaigns, and phishing scam sites posing as reputable companies.¹⁶ The reasons and motivations for Chorus to seek secrecy around its leadership and control of its website remain unanswered.

Influencer content inconsistent with certifications

Finally, the aforementioned legal leadership of the Creator Collective has a stated professional focus on winning elections, including at the state and local level. The Committee has obtained 50 quarterly reports completed by influencers contracting with Chorus. The reports include signed certifications from Chorus influencers attesting that they, “did not create any content on behalf of Chorus or using any Chorus resources that (i) expressly advocated the election or defeat of, or solicited funds for, a clearly identified candidate, political party, or ballot measure.” However, numerous Chorus influencers appear to have generated content potentially inconsistent with this certification. For example:

¹²*Research*, FUND FOR STATES, <https://www.fundforstates.org/research> (last visited Feb. 24, 2026).

¹³ STATE + LOCAL ELECTION ALLIANCE, <https://www.state-elections.org/> (last visited Feb. 24, 2026).

¹⁴Search for ‘wearechorus.com’, ICANN LOOKUP, <https://lookup.icann.org/en/lookup> (last visited Feb. 24, 2026).

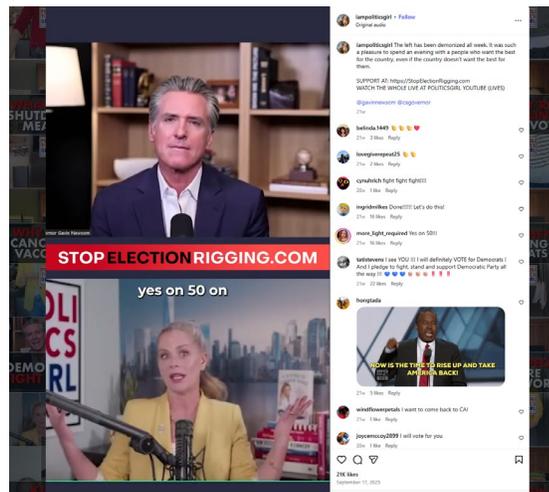
¹⁵ Steven Lee Myers & Tiffany Hsu, Some of the Web’s Sketchiest Sites Share an Address in Iceland, N.Y. Times (Oct. 15, 224).

¹⁶ *Id.*

- Chorus influencer Barrett Adair video post advocates for candidate Abigail Spanberger for Virginia Governor, (11/3/25, Instagram)¹⁷:



- Chorus influencer Leigh McGowan video post advocates for passage of California ballot initiative Proposition 50 (9/17/25, Instagram)¹⁸:



- Chorus influencer Brian Baez video post advocates voting for Democrats (11/4/25, TikTok)¹⁹:

¹⁷ Barrett Adair (barrettadair), INSTAGRAM (Nov. 3, 2025), https://www.instagram.com/reel/DQnOA4LEWZ8/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==.

¹⁸ Leigh McGowan (iampoliticsgirl), Instagram (Sep. 17, 2025), https://www.instagram.com/reel/DOuUJHjFOAG/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==.

¹⁹ Briam Baez (username), TikTok (Nov. 4, 2025), <http://www.tiktok.com/t/ZP8xMbkme/>.



It is unclear how influencers might claim that content clearly advocating for the election or defeat of candidates, parties, or ballot measures is not linked to the resources or purpose of Chorus. The Committee requires information about Chorus' business relationships with its contracted influencers and the resources it provides them to understand if federal laws are being systematically violated or circumvented, and whether additional legislation is needed to guard against similar future misconduct.

Continued involvement through Chorus' legal control

As underscored in the Committee's November 18, 2025, letter to Sixteen Thirty Fund, we understand that you as a practicing attorney have involved yourself in periods when Chorus existed under the control by Sixteen Thirty Fund and those when it did not.²⁰ 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 you and organizations you lead 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 from you personally, Creator Collective, and any other entity you control or contributed to affiliated with activities related to the Chorus creator incubator program covering the time period January 1, 2024, to the present unless otherwise indicated, as soon as possible but no later than April 3, 2026:

²⁰ *Graham Wilson, Our Team*, ELIAS LAW GROUP, <https://elias.law/bio/graham-wilson/> (last visited Feb. 24, 2026); *Comer Launches Investigation into Sixteen Thirty Fund's Reported Secretive Chorus Program, Effort to Evade Campaign Finance Laws*, COMM. ON GOV'T OVERSIGHT AND GOV'T REFORM: PRESS RELEASES (Nov. 19, 2025).

1. All documents and communications sent to or from Sixteen Thirty Fund and its employees or representatives from November 18, 2025, to present.
2. 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;
3. All requests for inclusion or information about participating in Chorus;
4. 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;
5. All documents and communications including any recordings, notes, minutes, or transcripts of meetings, video conferences, or calls related to the funding, creation, launch, coordination, and activities of Chorus and its participants;
6. 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;
7. All slide decks and other marketing materials, including any drafts or prior versions thereof, created for fundraising that mention or describe the Chorus project;
8. All requests for changes to slide decks and other marketing materials created for fundraising that mention or describe the Chorus project;
9. 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;
10. 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;
11. All documents and communications related to Chorus' compliance or reporting obligations with federal and state laws including all FEC requirements;
12. All documents related to or describing the budget and financial resources of the Chorus project;
13. All documents referring to, or communications with, the following individuals or entities:
 - a. Stuart Perelmuter
 - b. Brian Tyler Cohen
 - c. Ellie Langford
 - d. Greg Speed

Mr. Graham Wilson

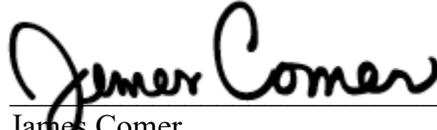
March 20, 2026

Page 7 of 7

- e. Kim Rogers
- f. Eric Ming
- g. Any employee or representative of Good Influence
- h. Sixteen Thirty Fund
- i. Arabella Advisors
- j. Sunflower Services
- k. America Votes
- l. Fund for States
- m. State + Local Election Alliance
- n. We Are Chorus LTD
- o. Withheld for Privacy
- p. Any subsidiary or organization affiliated with the Chorus creator incubator program

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

cc: The Honorable Robert Garcia, Ranking Member
Committee on Oversight and Government Reform