

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
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<https://oversight.house.gov>

May 14, 2026

Ms. Amy Kurtz
President
Sixteen Thirty Fund
1828 L St. NW
Washington, DC 20036

Dear Ms. Kurtz:

The Committee on Oversight and Government Reform is exploring whether legislative reforms are necessary to uphold fundamental American civil liberties and protect the integrity of American elections. In particular, the Committee is investigating the Chorus influencers program (Chorus) as part of an effort to identify policy gaps in campaign finance disclosure laws enforced by the Federal Election Commission (FEC) and the Department of Justice (DOJ), including distinguishing activities of legitimate journalists from campaign operatives whose paid activity requires disclosure.¹ On November 18, 2025, the Committee sought certain documents and communications from you related to this investigation.² Based on your limited and improperly redacted document productions, changes to your business structure, and your refusal to provide certain requested documents, compulsory process is necessary to obtain the information the Committee needs to further its legislative purposes.

To date, the Committee's investigation has highlighted how influencers paid to participate in the Chorus program (contractors) have generated content specifically advocating for voters to support candidates, ballot initiatives, and political parties in U.S. elections despite restrictions Chorus purportedly attempted to impose on their ability to do so.³ These election advocacy efforts, legal or otherwise, raise questions for Congress about coordination among parties that may necessitate revision to election and non-profit laws. Sixteen Thirty Fund has previously acknowledged that the Chorus incubator program existed as one of its projects in 2025 following Chorus' previous status as an independent legal entity.⁴ Documents in the possession of Sixteen Thirty Fund are essential to the Committee's ability to understand what role communications, expectations, and resources provided by Chorus may have contributed to

¹ Taylor Lorenz, *A Dark Money Group Is Secretly Funding High-Profile Democratic Influencers*, WIRED (Aug. 27, 2025).

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 *Comer Continues to Investigate Dark Money Group's Efforts to Evade Campaign Finance Laws*, COMM. ON OVERSIGHT AND GOV'T REFORM: PRESS RELEASES (Mar. 20, 2026).

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

these and other content posts regardless of any restrictions put in place by your organization. In addition, while the Committee has performed preliminary analysis on some of the publicly disclosed contractors working with Chorus, it is impossible to perform similar analysis on contractors who have accepted financial and resource support from your organization but have not been disclosed. The Committee requires documents in your possession to complete its oversight and inform the contours of potential legislation.

Sixteen Thirty Fund's voluntary compliance with requests to date has been unacceptable. Sixteen Thirty Fund has produced just 135 pages since November 18, 2025, which is a pace of less than one page per day since the Committee's request. Furthermore, of the 135 pages provided to the Committee, 62 included obstructive redactions. The Committee has indicated to your counsel that these limited and redacted productions are insufficient, yet Sixteen Thirty Fund has not addressed the Committee's need for information.⁵ For example, on January 29, 2026, the Committee—via staff email to your counsel—reiterated its request for “[u]nredacted versions of the initial production [made by Sixteen Thirty Fund to the Committee]” as top priority.⁶ In refusing to provide these unredacted documents, your representatives vaguely cited “various privileges” and “the personal safety of individuals” for redactions and other withholdings.⁷

Assertions to the Committee that equate production to public release of documents creating personal safety risks for Chorus contractors⁸ are not persuasive or valid justifications for withholding information. Courts have rejected the argument that production of information to Congress is tantamount to public release. The D.C. Circuit in *Exxon Corp. v. FTC* held that release of information to Congress does not constitute public disclosure and that courts “must presume that the committees of Congress will exercise their powers responsibly and with due regard for the rights of affected parties[.]”⁹ Furthermore, the argument that production of documents disclosing an affiliation with Chorus by its contractors would harm their personal safety is undermined by the failure to have produced even documents for the limited set of contractors publicized on Chorus' own website.¹⁰

Sixteen Thirty Fund's limited production of documents also add weight to the necessity and appropriateness for utilizing the Committee's compulsory legal process to obtain information. Sixteen Thirty Fund's contracting templates for Chorus contractors specifically contemplate the possibility and process for providing confidential contractor information under a legal process such as a congressional subpoena. Clause 4(b) of agreements for providing “amplifier services,” “community member services,” and “contributor services” outline a “nondisclosure” provision whereby Sixteen Thirty Fund and Chorus contractors made a mutual

⁵Comm. On Oversight And Gov't Reform Maj. staff–Sixteen Thirty Fund Counsel Phone Call (Jan. 23, 2026); Email from Oversight Committee Maj. staff to Sixteen Thirty Fund representatives (Jan. 29, 2026) (on file with Comm. On Oversight And Gov't Reform); Email from Comm. On Oversight And Gov't Reform Maj. staff to Sixteen Thirty Fund representatives (Feb. 5, 2026) (on file with Comm. On Oversight And Gov't Reform).

⁶ Email from Oversight Comm. Maj. Staff, *supra* n. 4, at email dated Jan. 29, 2026.

⁷ Letter from Sixteen Thirty Fund to Committee staff (Feb. 27, 2026) (on file with Comm. On Oversight And Gov't Reform).

⁸ *Id.*

⁹ *Exxon Corp. v. FTC*, 589 F.2d 582, 589 (D.C. Cir. 1978).

¹⁰ *MEET THE TEAM*, CHORUS <https://www.wearechorus.com/team> (last visited Apr. 15, 2026).

and reciprocal agreement “not to disclose such Confidential Information to any third party unless such disclosure is required by a valid law or legal process[.]”¹¹ The clause even outlined specific steps for Sixteen Thirty Fund to provide notice to its contractors and then proceed in providing the Committee with information subject to subpoena.¹² As such, use of the Committee’s subpoena authority triggers a process Sixteen Thirty Fund and its contractors have already contemplated and agreed to for providing the Committee with information it seeks. The Committee expects Sixteen Thirty Fund to promptly follow its legal obligations and produce documents without delay, because, as the Supreme Court has stated, there exists “a legal obligation to comply with a duly issued [Congressional] subpoena.”¹³

Concern that your organization may attempt to shirk its legal obligations in response to this subpoena is acute. It appears Sixteen Thirty Fund may have attempted to mislead the Committee about its legal structure and that of Chorus. On December 16, 2025, Sixteen Thirty Fund stressed in a letter to this Committee that Chorus is “not an independent legal entity.”¹⁴ This statement was made despite the reality, that on November 21, 2025—only three days after you received the Committee’s November 18, 2025 letter—records with the Government of the District of Columbia (D.C.) show that Graham Wilson, who represented Chorus during its time under Sixteen Thirty Fund, filed as founder of a new independent domestic nonprofit corporation called the Creator Collective.¹⁵ Then, on December 17, 2025, the day *after* Sixteen Thirty Fund sent its reply to the Committee in which it asserted, “[a]s a project of [Sixteen Thirty Fund], Chorus is not an independent legal entity,”¹⁶ “Chorus” was registered with the D.C. Government by Wilson as a trade name under the previously incorporated Creator Collective.¹⁷ Only after being pressed by Committee staff did counsel for Sixteen Thirty Fund, on February 6, 2026, acknowledge the change of status.¹⁸ This attempt to obfuscate Chorus’s legal structure strongly suggests an intent to hide potentially responsive documents and delay the Committee’s investigation. Despite the Committee’s best efforts to secure voluntary compliance, your organization has not cooperated. As a result, please see the attached subpoena for certain documents and communications on or before May 28, 2026.

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.¹⁹ Further, pursuant to House Rule XI clause 2(k)(6)

¹¹ Sixteen Thirty Fund production (Feb. 27, 2026) (on file with Comm. On Oversight And Gov’t Reform).

¹² The agreement states that Sixteen Thirty Fund must provide all Chorus influence participants subject to the agreement “written notice of the nature of the required disclosure and the source of the compulsion to disclose prior to disclosure of any such information so that the Disclosing Party may seek a protective order or other appropriate remedy[.]”

¹³ *Watkins v. United States*, 354 U.S. 178, 187–88 (1957)

¹⁴ *Supra* n. 4.

¹⁵ 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).

¹⁶ *Supra* n. 4.

¹⁷ *Supra* n. 15.

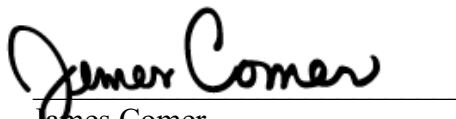
¹⁸ Email from Sixteen Thirty Fund, to Oversight Committee Maj. staff (Feb. 6, 2026) (on file with Comm. On Oversight And Gov’t Reform).

¹⁹ Rule X, cl. 4(c)(2), Rules of the U.S. House of Representatives, 119th Cong. (Jan. 16, 2025).

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“...the chair shall receive and the committee shall dispose of requests to subpoena additional witnesses.”²⁰ Additionally, House Rule XI clause 2(m)(1)(B) grants Committees of the House of Representatives the authority “to require, by subpoena or otherwise, the attendance and testimony of such witnesses and the production of such books, records, correspondence, memoranda, papers, and documents as it considers necessary.”²¹ If you have any questions regarding this subpoena, please contact Committee on Oversight and Government Reform Majority staff at (202) 225-5074.

Sincerely,

A handwritten signature in black ink that reads "James Comer". The signature is written in a cursive style and is positioned above a horizontal line.

James Comer
Chairman
Committee on Oversight and Government Reform

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

²⁰ *Id.*; Rule XI, cl. 2(k)(6), Rules of the U.S. House of Representatives, 119th Cong. (Jan. 16, 2025).

²¹ *Id.*; Rule XI, cl. 2(m)(1)(b), Rules of the U.S. House of Representatives, 119th Cong. (Jan. 16, 2025).