

Congress of the United States

Washington, DC 20515

September 8, 2026

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Acting Comptroller General of the United States
U.S. Government Accountability Office
441 G Street N.W.
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Acting Comptroller General Williams Brown:

We are writing with an urgent request for GAO review to help preserve the integrity of the fast-approaching election. On July 2, 2026, the Democratic staff of the Committee on Natural Resources released an interim report documenting Freedom 250's hostile takeover and intentional sidelining of America250 in hosting semiquincentennial celebrations.¹ Among the report's findings, our ongoing investigation has uncovered evidence that Freedom 250 LLC co-opted the funds set aside for America's semiquincentennial and used them in part to assemble an apparatus that collects Americans' personal data – including that of minors – run by vendors owned by the president's longtime allies.² However, we do not know where that data is stored, who controls it and is responsible for ensuring data privacy, or what, if anything, prevents its transfer to WinRed, the Republican National Committee, or the Trump-aligned political action committees (PACs) these vendors already serve within the MAGA movement's political machine. Based on our preliminary findings, President Trump and his allies are in a position to use information on American voters, harvested with taxpayer money and government resources, in an attempt to tip the scales in the upcoming midterm elections. This is a grave threat to Americans' personal privacy and freedom from election interference, and we are asking the Government Accountability Office to investigate.

America250 is the nonprofit commission that Congress officially chartered in 2016 to plan semiquincentennial celebrations across the nation on a non-partisan basis. Freedom 250 is a partisan, limited liability company set up in the fall of 2025 to host parallel semiquincentennial events by President Trump and his allies. It is lodged inside the National Park Foundation, the philanthropic partner Congress chartered to support the National Park Service.³

America celebrated its semiquincentennial on July 4, 2026. One year prior, on July 4, 2025, the United States Congress passed the One Big Beautiful Bill Act, which provided \$150 million in funding for events, celebrations, and activities surrounding the observance of this historic anniversary.⁴ Freedom 250 captured the lion's share of this funding, including an additional \$10 million in Institute of Museum and Library Services funds transferred away from America250, while America250 received \$25 million of the \$50 million promised to it in a signed agreement

¹ DEMOCRATIC STAFF OF THE H. COMM. ON NATURAL RESOURCES, FROM VANITY TO INSANITY: HOW THE WHITE HOUSE CHEATED THE AMERICAN PEOPLE OUT OF THEIR 250TH BIRTHDAY (July 2, 2026), https://democrats-naturalresources.house.gov/imo/media/doc/freedom250_oversight_report2.pdf.

² *Id.*

³ *Id.*

⁴ One Big Beautiful Bill Act, Pub. L. No. 119-21, 139 Stat. 72 (2025).

with the National Park Service.⁵ Freedom 250, designated as the “primary public-private partner for the America250 commemoration period, ... operational implementing entity for America250 projects executed under [the] Agreement,” and the entity responsible for leading the President’s “signature events,” utilized those funds to host events catered towards the President.⁶ Because Freedom 250 usurped America250’s role in the celebrations, first taking its congressionally appropriated funds and then placing its branding across the federal government, Americans engaging with Freedom 250 programming often do not realize the partisan and hyperpolitical nature of the organization.⁷ Any American, simply seeking to participate in semiquincentennial activities, could have purchased merchandise celebrating America’s 250th birthday or signed up to attend a free event in Washington, D.C., and in so doing, unwittingly turned their personal information over to the President and his allies – individuals that are closely involved in Freedom 250’s creation and operations.

Freedom 250 Used MAGA Campaign Affiliates to Collect Americans’ Information

Registration, ticketing, and data collection for Freedom 250’s events are handled by Campaign Nucleus, a political technology firm founded by Brad Parscale, who directed the President’s 2016 digital operation and managed his 2020 campaign.⁸ On July 1, 2026, the Executive Office of the President awarded Campaign Nucleus a non-competitive \$66,000 blanket purchase agreement for software described as ‘EVENT PLANNING,’ performed in Washington, D.C. and running through 2031.⁹ Every person who requested a free ticket to attend a Freedom 250 event submitted their name, an email address, a telephone number, and ZIP code into this system, which is owned by the President’s former campaign manager. That includes attendees of the FIFA World Cup Fan Zone on the National Mall, the Great American State Fair, the July 4 Salute to America, and the Patriot Games.

Mr. Parscale’s involvement with Freedom 250 is not limited to Campaign Nucleus; Freedom 250’s email and text messaging is managed by Dyspatchit, a firm also owned by Mr. Parscale.¹⁰ It is

⁵ DEMOCRATIC STAFF OF THE H. COMM. ON NATURAL RESOURCES, FROM VANITY TO INSANITY: HOW THE WHITE HOUSE CHEATED THE AMERICAN PEOPLE OUT OF THEIR 250TH BIRTHDAY, at 16 (July 2, 2026), https://democrats-naturalresources.house.gov/imo/media/doc/freedom250_oversight_report2.pdf.

⁶ Cooperative Agreement P26AM00099 between the U.S. Dep’t of the Interior, Nat’l Park Serv., and Nat’l Park Found. (Nov. 11, 2025) (on file with the Committee).

⁷ DEMOCRATIC STAFF OF THE H. COMM. ON NATURAL RESOURCES, FROM VANITY TO INSANITY: HOW THE WHITE HOUSE CHEATED THE AMERICAN PEOPLE OUT OF THEIR 250TH BIRTHDAY (July 2, 2026), https://democrats-naturalresources.house.gov/imo/media/doc/freedom250_oversight_report2.pdf.

⁸ DEMOCRATIC STAFF OF THE H. COMM. ON NATURAL RESOURCES, FROM VANITY TO INSANITY: HOW THE WHITE HOUSE CHEATED THE AMERICAN PEOPLE OUT OF THEIR 250TH BIRTHDAY, at 35 (July 2, 2026), https://democrats-naturalresources.house.gov/imo/media/doc/freedom250_oversight_report2.pdf.

⁹ *Id.*, at 25.

¹⁰ Alan Suderman & Garance Burke, *Brad Parscale helped Trump win in 2016 using Facebook ads. Now he's back, and an AI evangelist*, AP (May 6, 2024), <https://apnews.com/article/ai-trump-campaign-2024-election-brad-parscale-3ff2c8eba34b87754cc25e96aa257c9d>.

registered to the same Florida address as Campaign Nucleus.¹¹ Donald J. Trump for President 2024, Inc. and the Trump Save America Joint Fundraising Committee also paid Dyspatchit for “email services” during the 2024 election.¹² Beyond the event registration forms and email and text messaging services, the official Freedom 250 merchandise storefront has also been contracted out to a Trump campaign vendor. The storefront, which collects billing and mailing addresses along with a person’s contact information when an order is placed, is operated by Ace Specialties.¹³ Ace Specialties, the President’s official campaign merchandise supplier in 2016 and 2020, received \$6.5 million from the Trump Save America Joint Fundraising Committee in 2024, and is currently affiliated with WinRed, the Republican Party’s fundraising platform. The information this vendor collects at Freedom 250 storefronts could easily be offered as a product to the RNC or any of the PACs Ace Specialties serves today.¹⁴

Further, the National Design Studio – a temporary agency within the Executive Office of the President largely staffed by ex-DOGE employees – is responsible for designing and managing the Freedom 250 website.¹⁵ When they created the website, they inserted a PostHog script into the site’s backend.¹⁶ PostHog is a commercial tool for developers that can automate the collection of user-input data from websites, including every click, scroll and keystroke a visitor makes as well as their location, and evade ad blockers while doing so.¹⁷ The website developer can turn this feature on and off with the flick of a switch and begin collecting users’ information. Although the National Design Studio deactivated the PostHog tracker on the site on or around June 18, 2026, following an inquiry from the Guardian, it can be reactivated at any time.¹⁸ Consequently, even without Campaign Nucleus’ or Dyspatchit’s involvement, the administration has the ability to collect user data that could be used to construct a contact database prior to the midterms; and if utilized by Mr. Parscale, the PostHog script adds an extra layer of user’s behavioral and

¹¹ Florida Dep’t of State, Division of Corporations, Detail by Entity Name, Dyspatchit Email and Text Services LLC, <https://search.sunbiz.org> (last visited August 11, 2026).

¹² Fed. Election Comm’n, *Disbursements to Dyspatchit*, 2023–2024 election cycle, https://www.fec.gov/data/disbursements/?recipient_name=DYSPATCHIT&two_year_transaction_period=2024 (last visited August 11, 2026).

¹³ Freedom 250, *Freedom 250 Storefront Contact Information*, <https://shop.freedom250.org/policies/contact-information> (last visited August 11, 2026).

¹⁴ WinRed, *Ace Specialties Homepage*, <https://winred.com/product-catalog/ace-specialties> (last visited August 6, 2026); OpenSecrets, *Vendor/Recipient Profile: Ace Specialties*, <https://www.opensecrets.org/campaign-expenditures/vendor?cycle=2024&vendor=Ace+Specialties> (last visited Sept. 2, 2026) (reporting \$24,996,518 in payments during the 2024 cycle, including \$13,208,121 from Trump National Committee JFC and \$6,474,433 from Trump Save America JFC).

¹⁵ National Design Studio (@ndstudio), X (April 14, 2026, 4:58PM), <https://x.com/ndstudio/status/2044158296416813379>

¹⁶ Jason Wilson, *‘It’s dangerous and it’s going to erode trust’: redesign of US government websites stokes surveillance fears*, THE GUARDIAN (June 28, 2026), <https://www.theguardian.com/us-news/2026/jun/28/government-website-visitor-tracking-surveillance-fears>.

¹⁷ Dustin Byrne, *How to prevent feature flags from being blocked*, POSTHOG (Nov. 3, 2025), <https://posthog.com/tutorials/flags-adblock-prevention>.

¹⁸ Jason Wilson, *‘It’s dangerous and it’s going to erode trust’: redesign of US government websites stokes surveillance fears*, THE GUARDIAN (June 28, 2026), <https://www.theguardian.com/us-news/2026/jun/28/government-website-visitor-tracking-surveillance-fears>.

geolocation data that can enrich the information that is already collected by the event registration forms.

Freedom 250 Lacks Sufficient Data Privacy Protections

Given Freedom 250's unique organizational structure as a private limited liability company, coupled with its affiliation with the White House, the National Design Studio, and the National Park Foundation, laissez-faire terms of service on affiliated events, and the lack of publicly available information about its data protection practices, we are concerned that the data may not remain siloed within the Freedom 250 organization. Freedom 250's privacy policy states that the information it collects is controlled by a "data protection manager," who is not publicly named and does not have an individual, specific email beyond the general informational email for the entire Freedom 250 organization – info@freedom250.org.¹⁹ Freedom 250 is wholly owned by the National Park Foundation, and control of the Foundation's board is control of Freedom 250. That board now includes John DeStefano, a former president of Data Trust, the firm that handles voter data for the Republican National Committee, alongside Trump campaign finance architects Meredith O'Rourke and Chris LaCivita.²⁰ The National Park Foundation's charter authorizes it to accept and administer gifts for the benefit of the National Park Service's mission, not to operate nationwide data collection.

It is unclear what safeguards exist to prevent data collected by Freedom 250 from migrating to Freedom 250's political allies or to the White House's National Design Studio, which is staffed by ex-DOGE employees notorious for their demonstrated record of misusing and exfiltrating data.²¹ If any data is being collected and stored by the National Design Studio, it is subject to the Paperwork Reduction Act – which requires federal agencies, including those under the Executive Office of the President, to seek permission from the Office of Management and Budget before collecting personal information from ten or more people.²² Our search of the Federal Register shows no such filings on behalf of the National Design Studio, despite the use of the PostHog script prior to June 18th, raising concerns that the National Design Studio may have collected user data from the Freedom 250 site and failed to publicly report it as required by the law.²³

¹⁹ *Id.*

²⁰ DEMOCRATIC STAFF OF THE H. COMM. ON NATURAL RESOURCES, FROM VANITY TO INSANITY: HOW THE WHITE HOUSE CHEATED THE AMERICAN PEOPLE OUT OF THEIR 250TH BIRTHDAY, at 20 (July 2, 2026), https://democrats-naturalresources.house.gov/imo/media/doc/freedom250_oversight_report2.pdf.

²¹ Jason Wilson, 'It's dangerous and it's going to erode trust': redesign of US government websites stokes surveillance fears, THE GUARDIAN (June 28, 2026), <https://www.theguardian.com/us-news/2026/jun/28/government-website-visitor-tracking-surveillance-fears>

²² Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 109 Stat. 163 (codified as amended at 44 U.S.C. §§ 3501–3521).

²³ FederalRegister.gov, *Search*, <https://www.federalregister.gov/documents/search?conditions%5Bterm%5D=%22National+Design+Studio%22> (searching of Federal Register for the term "National Design Studio," conducted Aug. 18, 2026).

Freedom 250's Data Could Enrich MAGA Campaign Outreach Ahead of the Midterms

The information collected by Freedom 250 and its affiliates, including the National Design Studio, could seed Republican political campaigns and fundraising. Freedom 250 vendors Campaign Nucleus and Ace Specialties specialize in serving Republican candidates, party committees, and Trump-aligned PACs, making them integral hubs of the MAGA movement's political machinery. Both firms specialize in serving Republican candidates, party committees, and Trump-aligned PACs. Mr. Parscale, a noted digital strategist who has been at the forefront of leveraging AI in campaign operations, is embedded in the conservative political ecosystem. Mr. Parscale's firms have been paid millions of dollars by the Trump campaign, the Republican National Committee, and affiliated political and fundraising committees since 2023 for providing digital campaign strategy – specifically for identifying, targeting, and persuading Americans to vote for Republican candidates.²⁴ The Associated Press has reported that Mr. Parscale's firm Campaign Nucleus “specializes in mining information from a politician's supporters” and using “AI to analyze reams of personal data to assign that person a numerical score,” yielding lists of voters deemed persuadable by Mr. Parscale's methodology that can then be targeted with specific outreach, ads, and social media campaigns to tilt the scales in favor of Republican candidates.²⁵

This is particularly insidious because telephone numbers and email addresses, the information collected by Campaign Nucleus for Freedom 250, are among the most valuable assets in modern political campaigning. They permit direct, low-cost contact for fundraising, volunteer recruitment, and voter mobilization. A national contact list assembled at taxpayer expense, enriched with geolocation and behavioral data and scored for persuadability, is an asset of extraordinary value to a party heading into a midterm election. Information about voter preferences has a short shelf life, making more recently collected information immediately usable by Republican campaigns. In unprecedented fashion, this list was built with money Congress appropriated for a nonpartisan celebration, from events held on public land, by a limited liability company housed within a Congressionally-chartered charity intended to support the executive branch of the federal government of the United States.

Freedom 250 Has Already Been Leveraged for MAGA Midterm Campaign Fundraising

Indeed, the record already shows that the barriers between Freedom 250 and the Trump campaign are porous. On June 24, 2026, Americans seeking free tickets to the Freedom 250 July 4th Salute on the National Mall were asked to fill out a form hosted by Campaign Nucleus.²⁶ Although the text of the form claimed that entering a phone number was optional to complete registration, the

²⁴ Alan Suderman & Garance Burke, *Brad Parscale helped Trump win in 2016 using Facebook ads. Now he's back, and an AI evangelist*, AP (May 6, 2024), <https://apnews.com/article/ai-trump-campaign-2024-election-brad-parscale-3ff2c8eba34b87754cc25e96aa257c9d>.

²⁵ Fed. Election Comm'n, *Disbursements to Campaign Nucleus and to Dyspatchit, 2023–2024 and 2025–2026 election cycles*, <https://www.fec.gov/data/disbursements> (last visited August 11, 2026).

²⁶ Josh Meyer, *Trump-tied Freedom 250 sent ticket seekers to GOP fundraising site*, USA TODAY (July 2, 2026), <https://www.usatoday.com/story/news/usa250/2026/07/02/trump-freedom-250-ticket-gop-fundraising-website/90709404007>.

form could not be submitted if the phone number field was left blank.²⁷ Once the form was completed, phone number intact, it asked registrants to consent to a recurring text messaging program delivering “alerts, donation requests” and other information.²⁸ It also provided registrants with the link to a Trump-branded event site, 45.donaldjtrump.com – a site that was hosted by WinRed and contained a “NeverSurrender Inc.” donation page soliciting contributions of up to \$5,000.²⁹

This form represents a stunning misuse of Freedom 250 resources to explicitly request event registrants to join President Trump’s “Prestigious MAGA Midterm Roster,” and donate to the Trump-aligned political action committee (PAC) Never Surrender. It poses several concerns – firstly, that the message was sent without disclosing the affiliation with a highly partisan political action committee in the body of the message, as required by the FEC when sending “public communication... including communications that do not expressly advocate the election or defeat of a clearly identified federal candidate or solicit a contribution.”³⁰ Regardless of the disclaimer, utilizing federal dollars for campaign purposes rather than semiquincentennial programming would violate the Purpose Statute, which expressly states that “appropriations shall be applied only to the objects for which the appropriations were made.”³¹ It would also violate the IRS code, which prohibits tax-exempt organizations like the National Park Foundation and its wholly-owned subsidiary, Freedom 250, from “directly or indirectly participating in, or intervening in, any political campaign.”³²

After USA Today sought comment, Freedom 250 removed the fundraising consent language and claimed that “standard vendor-provided consent language related to opting in for SMS (text) messages referenced fundraising in parts of the registration flow,” but “did not reflect how the SMS messaging system is actually used.”³³ However, weeks after the donation link was sent to event registrants for the July 4th Salute, an email was sent from “Freedom 250 <contact@win.donaldjtrump.com>”.³⁴ This is a sender using the name Freedom 250, as well as the official logo, branding, and standard email template of past Freedom 250 emails, but sending

²⁷ *Id.*

²⁸ *Id.*

²⁹ WinRed, *Never Surrender Inc. Donation Request*, https://secure.winred.com/never-surrender/lp-hf-sms-ops-default-donate-page?money_pledge=true&exitintent=true (last visited August 11, 2026)

³⁰ *Id.*

³¹ 31 U.S.C. § 1301.

³² Internal Revenue Serv., *Restriction of political campaign intervention by Section 501(c)(3) tax-exempt organizations*, <https://www.irs.gov/charities-non-profits/charitable-organizations/restriction-of-political-campaign-intervention-by-section-501c3-tax-exempt-organizations> (last visited August 28, 2026); Ki P. Hong, et al., *Potential Compliance Issues Raised by Donations to Various Entities for America’s 250th Celebrations*, SKADDEN (March 5, 2026) <https://www.skadden.com/insights/publications/2026/03/potential-compliance-issues-raised>.

³³ Josh Meyer, *Trump-tied Freedom 250 sent ticket seekers to GOP fundraising site*, USA TODAY (July 2, 2026), <https://www.usatoday.com/story/news/usa250/2026/07/02/trump-freedom-250-ticket-gop-fundraising-website/90709404007>.

³⁴ Archive of Political Emails, *Search*, <https://politicalemails.org/organizations/415?query=freedom+250> (last visited Aug. 18, 2026) (searching for sender profile “Donald Trump,” for the term “Freedom 250”).

the email from an address associated with Never Surrender.³⁵ In fact, the domain of the email address, <https://win.donaldjtrump.com/>, directs visitors to the very same MAGA donation link operated by Never Surrender that Freedom 250 claimed was included by mistake on June 24th.³⁶ This was not a one-time occurrence; similar emails were sent multiple times between June 30th and July 13th, none of which disclosed that Never Surrender paid for or was otherwise involved in the message.³⁷ This means that either Freedom 250 is so closely tied to the Trump campaign that it is using the campaign PAC's email for its own regular business purposes, or that Freedom 250's mailing list has already been shared with the Trump campaign and the campaign is utilizing it for outreach. In either scenario, it is clear that Freedom 250 and the Trump campaign are co-mingling their activities and using Freedom 250's collected data to point registrants to a campaign PAC's website.

There is an established link connecting Never Surrender and Freedom 250 that helps explain this cross-pollination. Federal Election Commission (FEC) records show that Never Surrender, the PAC operating the donation page to which Freedom 250 registrants were directed, has paid Dyspatchit, the vendor that manages Freedom 250's email and text messaging, \$426,197 for email services during the 2025 to 2026 election cycle.³⁸ That is, the vendor engaged to communicate with Freedom 250's registrants is concurrently on retainer for the PAC soliciting those same registrants for donations.

Data-sharing Raises Potential Campaign Finance and Data Privacy Concerns

These facts raise two categories of concern. The first is appropriations and campaign finance. The National Park Foundation has acknowledged that the majority of Freedom 250's operating funds come from federal funds appropriated by Congress in the One Big Beautiful Bill Act.³⁹ As of April 2026, the Department of the Interior reports a \$68 million award to the National Park Foundation, which houses Freedom 250, for "A250 Events," with a period of performance running into 2028.⁴⁰ Freedom 250's sponsored events often take place on federal land, specifically the National Mall and other units of the National Park System, are secured and staffed by federal personnel, and are promoted through official federal channels. Federal funds may be obligated only for the purposes for which Congress appropriated them, yet the Department of the Interior has directed its staff to place Freedom 250 logos in official email signatures, federal building facades, and mail postmarks; Freedom 250's demonstrated partisan conduct makes such saturation a potential Hatch Act

³⁵ *Id.*

³⁶ WinRed, *Support Trump-Vance 2024!*, <https://win.donaldjtrump.com> (last visited Aug. 18, 2026).

³⁷ Archive of Political Emails, *Search*, <https://politicalemails.org/organizations/415?query=freedom+250> (last visited Aug. 18, 2026) (searching for sender profile "Donald Trump," for the term "Freedom 250").

³⁸ Fed. Election Comm'n, *Disbursements to Dyspatchit, 2025–2026 election cycle*, https://www.fec.gov/data/disbursements/?recipient_name=DYSPATCHIT&two_year_transaction_period=2026 (last visited August 11, 2026) (reflecting \$426,197 in eighteen disbursements from Never Surrender, Inc).

³⁹ DEMOCRATIC STAFF OF THE H. COMM. ON NATURAL RESOURCES, FROM VANITY TO INSANITY: HOW THE WHITE HOUSE CHEATED THE AMERICAN PEOPLE OUT OF THEIR 250TH BIRTHDAY (July 2, 2026), https://democrats-naturalresources.house.gov/imo/media/doc/freedom250_oversight_report2.pdf

⁴⁰ Anna Kramer, *America's Bipartisan Birthday Commission Is Losing to Trump*, NOTUS (June 1, 2026), <https://www.notus.org/trump-white-house/america-250-shortfall-freedom-250-interior-funds>

violation.⁴¹ Thus, using an email affiliated with a political action committee to send Freedom 250 marketing, without disclosing the affiliation with a highly partisan political action committee in the body of the email as required by 52 U.S.C. § 30120, is especially cause for concern and further investigation as to potential violations of federal election laws.⁴²

If this email was sent by Dyspatchit, acting on behalf of either Freedom 250 as a vendor, it implicates the use of federal funds to pay a vendor that performed services for a political action committee. Further, if appropriated federal dollars and resources were used by Freedom 250 to pay vendors to build a contact list that is available, directly or indirectly, to political action committees, the transfer could raise questions under the purpose statute and under the prohibitions on political campaign contributions by corporations, federal contractors, and tax-exempt nonprofits.⁴³

The second category of concern is privacy and information security. Federal privacy law does not apply to Freedom 250 because, as a nonprofit subsidiary, it falls outside the jurisdiction of the Privacy Act of 1974 and the Paperwork Reduction Act, both of which only regulate federal agencies.⁴⁴ No federal statute governs the collection, retention, or disclosure of the personal information Freedom 250 gathers via federally funded channels; and according to Freedom 250's privacy policy, this includes tracking precise geolocation down to latitude, logging user actions, and capturing information users type into forms.⁴⁵

Consequently, Freedom 250's privacy policy is quite minimal—it does not name its data protection manager, sets no data retention limit, and specifies no date on which collected information is destroyed or relinquished.⁴⁶ Nor does the policy address what happens to data when Freedom 250 is dissolved: whether it would be destroyed, or whether it passes to the Foundation, the Park Service, or Freedom 250 vendors.⁴⁷ Freedom 250 states that its policy “does not apply to ... information collected by third parties,” including vendors, and further provides that “Freedom250 or its agents, vendors or contractors may disclose, share, and use your information,” granting its third-party vendors like Campaign Nucleus access to information collected by Freedom 250 for its own uses without imposing privacy restrictions.⁴⁸ In fact, Campaign Nucleus' privacy policy states that “we, or third parties acting on our behalf, may receive Personal Data about you from our affiliates and other business partners,” and that “we may share Personal Data with our affiliates and business partners for ... our business operations.”⁴⁹ Campaign Nucleus's privacy policy further

⁴¹ See 5 U.S.C. § 7321.

⁴² Fed. Election Comm'n, *Advertising and Disclaimers*, <https://www.fec.gov/help-candidates-and-committees/advertising-and-disclaimers/> (last visited Aug. 18, 2026)

⁴³ See 52 U.S.C. §§ 30118, 30119.

⁴⁴ Privacy Act of 1974, Pub. L. No. 93-579, 88 Stat. 1896; Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 109 Stat. 163

⁴⁵ Freedom 250, *Privacy Policy*, <https://freedom250.org/privacy-policy> (last visited August 6, 2026).

⁴⁶ *Id.*

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ Campaign Nucleus, *Privacy Policy – How we use personal data*, <https://www.campaignnucleus.com/privacy-policy> (last visited August 6, 2026).

reserves the right to use “aggregated, anonymized, or de-identified information ... for any lawful purpose,” as well as to utilize the personal data that it collects for “business purposes permitted under applicable law.”⁵⁰

Freedom 250 and its vendors are able to exercise such relaxed and permissive privacy policies because Freedom 250 is intentionally structured to escape the restraints posed by federal law. As demonstrated repeatedly in the interim staff report released by Natural Resources Committee Democrats, Freedom 250 took advantage of its unique status as a nonprofit to circumvent the rules and regulations typically associated with federal activities.⁵¹ In the future, this structure may be easily reused to create a federally-funded vehicle for data collection, and thus it is important to understand how to extend the jurisdiction of privacy law over such data to prevent the exploitation of public-private partnerships for such purposes.

Lack of Data Privacy in the Patriot Games Led to the Harassment of Teen Participants

The Patriot Games illustrate the potential consequences of the lack of sufficient data privacy protections. The competition was held from August 9 through 11, 2026, with a nationally televised finale on August 13, and was open to applicants aged 14 to 17.⁵² The application, which had a listed deadline of July 10, remained open for an additional ten days until July 20, potentially collecting private information for which it had no use.⁵³ It directed each teen applicant to post an introduction video to YouTube, collected their Instagram, X, and TikTok handles, and requested the right to use the minor’s name, image, and likeness.⁵⁴ Specifically, the application asked parents to consent to “allow Freedom 250 LLC to use [their] minor’s name, image or likeness without prior approval and without current or future compensation for marketing purposes related to the 2026 Patriot Games or Freedom 250 LLC.”⁵⁵ This consent form poses no end date after which the data will no longer be eligible for use, and it explicitly includes potential Freedom 250 uses, indicating the data is not firewalled within the Patriot Games event.⁵⁶ That application was processed through Campaign Nucleus infrastructure; had the National Park Service, or another federal entity, collected the same information, the notice and disclosure obligations of the Privacy Act of 1974 would have applied.⁵⁷

⁵⁰ *Id.*

⁵¹ DEMOCRATIC STAFF OF THE H. COMM. ON NATURAL RESOURCES, FROM VANITY TO INSANITY: HOW THE WHITE HOUSE CHEATED THE AMERICAN PEOPLE OUT OF THEIR 250TH BIRTHDAY (July 2, 2026), https://democrats-naturalresources.house.gov/imo/media/doc/freedom250_oversight_report2.pdf

⁵² Freedom 250, *The 2026 Patriot Games*, <https://freedom250.org/celebration/the-2026-patriot-games> (last visited August 6, 2026).

⁵³ Freedom 250, *The 2026 Patriot Games Submission Portal*, <https://freedom250.org/patriot-games> (last visited July 20, 2026) (archived at <https://web.archive.org/web/20260720032012/freedom250.org/patriot-games>).

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ *Id.*

⁵⁷ Privacy Act of 1974, Pub. L. No. 93-579, 88 Stat. 1896; Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 109 Stat. 163

Application videos in which minors identified their age, school, and hometown were publicly accessible under the terms Freedom 250 required for submission and were reviewed by multiple news organizations.⁵⁸ Several potential contestants went viral on social media before and during the competition, receiving harassment and lewd comments.⁵⁹ Minors received hostile messages on the personal social media accounts the application required them to disclose; the mother of one sixteen-year-old participant described deleting harmful comments left on her daughter's account by strangers.⁶⁰ Had Freedom 250 allowed applicants to submit videos via private hyperlinks, password protected hyperlinks, or the video files themselves, the teens' privacy might have been protected. Freedom 250's solicitation of teens' videos with little respect for their privacy adds evidence to their pattern of being cavalier with Americans' data.

Congress chartered both the Semiquincentennial Commission and the National Park Foundation to be insulated from the political actions of any administration. Both were turned to the opposite purpose, and Americans' data were potentially subject to untoward collection, commercialization, and wanton distribution by vendors dedicated to supporting the RNC and MAGA-aligned PACs. Congressional oversight of Freedom 250's data collection practices is necessary to prevent the reuse of such a structure in the future. To achieve this, Congress requires a clear understanding of how procurement practices, governance mechanisms, and compliance controls are functioning in relation to the distribution of funds, the permitting the use of public lands, and the protection of the privacy of the American public for these events. This request is made as a priority oversight matter of the House Committee on Natural Resources and the Committee on House Administration pursuant to our oversight responsibilities regarding the Department of the Interior, National Park Service, and the use of public lands, and federal elections administration. We respectfully request that the Government Accountability Office review all activity related to the distribution of funds to celebrate America's 250th anniversary.

We request that GAO examine the following:

1. Any acquisition governance or planning materials for Freedom 250, including contracting methods and guidance;
2. Contracts, procurement vehicles – including those used for federal purchases of Freedom 250 merchandise – and grants awarded by the Department of the Interior, the National Park

⁵⁸ Isabelle Khurshudyan, *Trump's Patriot Games are billed as a youth sports contest. They're also a test of patriotic branding*, CNN (Aug. 9, 2026), <https://www.cnn.com/2026/08/09/politics/patriot-games-trump-partisan-patriotic-branding>; Julian E.J. Sorapuru, *Inside Trump's Patriot Games, where a new generation was introduced to the ugly side of politics*, BOSTON GLOBE (Aug. 13, 2026), <https://www.bostonglobe.com/2026/08/13/nation/trump-patriot-games-athlete-backlash>; Connor Greene, *What Are Trump's Patriot Games? Teens From Every State Are Competing for a \$250,000 Prize Pool*, TIME (Aug. 11, 2026, 4:56 PM), <https://time.com/article/2026/08/11/patriot-games-trump-america-250-anniversary>.

⁵⁹ Julian E.J. Sorapuru, *Inside Trump's Patriot Games, where a new generation was introduced to the ugly side of politics*, BOSTON GLOBE (Aug. 13, 2026), <https://www.bostonglobe.com/2026/08/13/nation/trump-patriot-games-athlete-backlash>.

⁶⁰ *Id.*

Service, and the Institute of Museum and Library Sciences in relation to America's 250th anniversary, including:

- a. a full list of Freedom 250's vendors, subcontractors, and data processors, including the party and political action committee clients those entities served in the 2024 or 2026 election cycles;
 - b. the extent to which such funds were used by Freedom 250 to pay for ticketing, registration, email, text messaging, web development, analytics, or merchandise fulfillment services;
3. Documents created and steps, either taken or necessary, by relevant federal agencies to ensure the privacy of personal data collected from the public, as well as the extent of data-sharing conducted in the course of Freedom 250's activities, including:
- a. any privacy, records management, or information security requirements imposed on the National Park Foundation and Freedom 250 as recipients of federal funds, including governing the retention, transfer, or disclosure of personal information collected from event registrants;
 - b. the extent to which Freedom 250's data is, or could be made, accessible to political action committees, party committees, or other clients and affiliates of Freedom 250's vendors, and what contractual or statutory controls, if any, prevent such access;
 - c. the extent to which federal agencies, federal employees, and federal domains directed the public to registration portals that collected personal information or routed users to WinRed or similar partisan fundraising platforms, and how agencies accounted for the appropriations, personnel time, and property used to do so;
 - d. the applicability of the Privacy Act of 1974 and Paperwork Reduction Act to personal information collected by or on behalf of federal agencies and agencies in the Executive Office of the President through nonprofit subsidiaries, and their vendors, including information collected from minors; and
 - e. the presence of potential violations of the Purpose Statue, prohibitions on augmentation of appropriations, or laws governing political campaign contributions by corporations and by federal contractors by Freedom 250's and its vendors' use of federal funds;
4. Permits issued for the use of public land and facilities for the Celebration, and any and all steps taken to administer these awards or permits that the Comptroller General deems fit to investigate in relation to Freedom 250 celebrations.

Ms. Orice Williams Brown

September 8, 2026

Page 12

In addition, we ask that the GAO identify options, if any, for closing gaps in the federal privacy and information security framework governing nonprofits in public-private partnerships. Thank you for your attention to this request. Please contact the Minority Staff of the House Natural Resources Oversight and Investigations Subcommittee at (202) 225-6065 or the Minority Staff of the Committee on House Administration at (202) 225-2061 with any questions.

Sincerely,

A handwritten signature in blue ink, reading "Jared Huffman".

Jared Huffman
Ranking Member
Committee on Natural Resources

A handwritten signature in blue ink, reading "Joseph D. Morelle".

Joseph D. Morelle
Ranking Member
Committee on House Administration