

1 anything. But, you know, if I did, ask me about it,  
2 and I'll tell you if we did it.

3 Q Sounds good. So you mentioned that Freedom  
4 Vote dissolved within the past year or two. Do you  
5 remember why Freedom Vote dissolved?

6 A There was a case, the details of which you'd  
7 need to ask my lawyer, who's not in this case  
8 entirely. But that case pretty well bankrupt -- not  
9 pretty well -- that case bankrupt Freedom Vote so that  
10 when Freedom Vote ran out of money, all of which went  
11 to the legalities in the case, when we no longer had  
12 money, Freedom Vote was folded.

13 Q So what was that case about? Was it related  
14 to tax issues, or was it a different kind of  
15 litigation?

16 A To be very honest, if you have documents to  
17 remind me, I know that they kind of started in one  
18 direction and then moved in another. If you want to  
19 know details, you're going to have to ask Freedom's  
20 lawyer.

21 Q Okay. I do -- in the documents you provided  
22 us, there was reference to an IRS audit. Do you  
23 recall if the litigation was related to that audit, or  
24 was it a private suit to the best of your  
25 recollection?

1           A     I just don't know. You'd have to ask my  
2 lawyer, Freedom Vote's lawyer.

3           Q     Okay. So you're saying that Freedom Vote  
4 ran out of money, is that why it dissolved?

5           A     Yeah.

6           Q     Did Freedom Vote attempt to sort of raise  
7 more money and continue operations? Why did this sort  
8 of seem like the end of the road for Freedom Vote to  
9 you?

10          A     The result of the case, in our minds, would  
11 have made it very unlikely that any donor, any  
12 organization that would be supportive would want to  
13 put money into it because of the publicity surrounding  
14 the case, so it was just better to let Freedom Vote  
15 die a gentle death.

16          Q     So your -- to your recollection, Freedom  
17 Vote was a party to the case, is that correct?

18          A     Oh, yeah.

19          Q     Okay. Okay. Well, that's helpful. So you  
20 were the Executive Director at the time that Freedom  
21 Vote dissolved, is that correct?

22          A     Correct.

23          Q     Okay. So is not Freedom Vote for any sort  
24 of successor entity continuing to engage in activities  
25 at this point, perhaps under a different name to get

1 away from the publicity you mentioned?

2 A No.

3 Q Okay.

4 A I'm sticking with just no. Otherwise it's  
5 just no.

6 Q I'm interested in what you're thinking of.  
7 I mean, even if you don't think it's relevant, I'm  
8 curious as to what just came to mind.

9 A I'm not sure if something was sold about the  
10 use of something about Freedom Vote that was sold to  
11 somebody later on once I was gone, and you asked me to  
12 even guess at things, so, you know --

13 MR. SPIES: Jim, I'm going to instruct you  
14 not to guess at things. I realize Justine would love  
15 you to give a stream of consciousness, just everything  
16 you know about politics, but that's going to get you  
17 in trouble if you start speculating about things you  
18 don't know. So I'd rather you stick to stuff you  
19 actually know.

20 MS. DI GIOVANNI: Okay, Charlie. Thank you  
21 for that. And, of course, while, you know, there are  
22 certainly things that you may or may not have direct  
23 personal knowledge of, but if you have reason to  
24 believe something, that's something we're still very  
25 interested in hearing. So I appreciate that, though.