

1 think we've fleshed that out as much as we've can.

2 I'm going to move down now to "Educational Activity."

3 A Mm-hmm.

4 Q Here, do you see the payments to Main Street
5 Media Group?

6 A Correct, mm-hmm.

7 Q And the parentheses here, that says "media
8 buy," is that correct?

9 A Correct.

10 Q Okay. And we see that, over at the right,
11 we've got some pretty big disbursements here.

12 A Yes.

13 Q We've got 50,000 and -- or 600,000, pardon
14 me, and 497,000.

15 A Mm-hmm.

16 Q What can you tell me about these
17 expenditures? What were these for?

18 A I'm sorry, what?

19 Q What can you tell me about these
20 expenditures? What were these for?

21 A They were media buys that Freedom Vote did
22 for ads that we ran in the 2016 cycle.

23 Q And --

24 A So Main Street made the buy. They were the
25 firm that actually bought the media time.

1 Q So this is for television advertising? It
2 was for --

3 A Yes, I believe it would have been, and that
4 could have been radio in there, but I believe it was
5 primarily television.

6 Q And I'm not sure how recently you reviewed
7 the complaint in this matter, but was this for the
8 third largest television ad that the complaint refers
9 to?

10 A I cannot answer. I just know, and those
11 payments were just, you know, I believe -- I'm not
12 sure they were even broke -- how they were broken
13 down. No, I can't -- I know that sometimes they'd
14 just say send us this money now and the rest later or
15 something like that. I just don't remember.

16 Q Okay. We'll have more on that in a little
17 bit because we've actually got some documents that may
18 help refresh your memory, so we won't belabor that
19 until we have it in front of us. Then, moving down to
20 McCarthy, Hennings, Whalen, these are two
21 disbursements for production.

22 A Yes, mm-hmm.

23 Q Do you believe that that's the same?

24 A No. The first group bought the time; the
25 second group actually physically produced the ads.