

1 I'm going to let you take a look at this. Let me know  
2 when you've read the letter here.

3 A Yes.

4 Q Okay. I'm going to go down. This appears  
5 to be an email in which you attach a letter to this  
6 individual back from you, so I'll let you read the  
7 letter you sent then.

8 A Correct, yes.

9 Q Okay. So, going back to the email from --  
10 or the letter from the donor, with the understanding  
11 that, as you just told us, you can't speak for what  
12 someone -- what's in someone else's mind, but do you  
13 have any idea why this donor would have thought that  
14 giving money to Freedom Vote would be for the  
15 reelection of Rob Portman?

16 A I do know -- I cannot tell you that. I know  
17 that the second that that came across, I remember that  
18 the second I came across, we acted. But why that  
19 person felt what he did, I can't speak to.

20 Q Sure, and with the under --

21 A This isn't a situation I do remember.

22 Q Okay. So you may remember who this was, who  
23 this donor was. And do you recall whether you  
24 discussed Portman's election with this donor  
25 previously?

1           A     No, I -- that's not what I said. I have no  
2     recollection of who the donor is from memory. I  
3     remember getting a donation that made that claim, and  
4     we immediately reacted to it. What I'm remembering is  
5     the claim in this letter to me and that we reacted  
6     immediately to that. So I'm remembering the situation  
7     of somebody sending a check saying it was for the  
8     reelection of Portman. I don't remember who the donor  
9     was, anonymous or otherwise.

10          Q     Got it. Do you recall if you ever -- more  
11     generally -- not this donor specifically, but,  
12     generally, did you ever speak with donors about  
13     Portman or Strickland?

14          A     To the best of my knowledge, I never --  
15     again, to the best of my knowledge, I never mentioned  
16     either name to a donor.

17          Q     Okay. So, when you sent this letter to the  
18     donor, we see the email you have here where you  
19     attached it, and the donor replies, "Thanks." Did you  
20     ever speak with this donor about this matter further,  
21     or was this the end of the conversation?

22          A     That's what I'm having trouble remembering.  
23     I know that we sent the letter. Our lawyer drafted it  
24     for me. And I can't really remember, to your  
25     question, because what I remember was the shock of

1 receiving that letter and reacting to it. The follow-  
2 up, I don't actually remember.

3 Q Sure. Do you have any recollection about  
4 how Freedom Vote would have spent the \$500,000 it  
5 received from this person?

6 A Well, I -- the -- if we -- I believe that  
7 was 2016. You can see from the spreadsheets I  
8 provided you exactly where every penny we raised in  
9 2016 was spent.

10 (The document referred to was  
11 marked for identification as  
12 Exhibit No. 13.)

13 BY MS. DI GIOVANNI:

14 Q All right. I'm going to take back Exhibit  
15 No. 12, and I'm going to put forward our last exhibit,  
16 Exhibit No. 13, lucky No. 13. So I'm going to -- this  
17 is just one page, and it is Bates stamped 1393. I'm  
18 going to just let you read it. It is dated October 5,  
19 2016, and sent to you. Let me know when you finish.

20 (Pause.)

21 A Continue.

22 Q Okay. So can you please read me the line  
23 beginning "Enclosed, please find," and you can finish  
24 at the end of that sentence.

25 A Sure. "Enclosed, please find a \$10,000