

1 matter or --

2 A Correct, correct, the IRS matter.

3 Q Okay. So Freedom Vote was served our first
4 subpoena in this matter, and this is after it was
5 given notice of the complaint and given an opportunity
6 to respond, we served our first documentary subpoena
7 in July of 2019. Why didn't Freedom Vote respond to
8 that subpoena or any of the subsequent notifications
9 that we sent?

10 A You will have to ask Freedom Vote's lawyer
11 to answer that question.

12 Q But you're Freedom Vote -- you were, pardon
13 me, Freedom Vote's Executive Director.

14 A Correct.

15 Q You would have been involved -- you were
16 involved in making decisions with its counsel, were
17 you not?

18 A We provided counsel all Freedom Vote
19 documents in order to comply to the subpoena. The
20 decision how to comply to the subpoena was not mine.

21 Q Whose was it?

22 A It was the lawyer's.

23 Q Which lawyer?

24 A It was Freedom Vote's lawyer, David Langdon.

25 Q So am I understanding you to say that

1 Freedom Vote's lawyer made decisions without your
2 input on how to comply with federal law enforcement?

3 MR. SPIES: Jim, I do not want you to go
4 into the advice you received from counsel here.

5 BY MS. DI GIOVANNI:

6 Q Okay. Were you aware of the correspondence
7 that Freedom Vote had received from the FEC?

8 A Yes.

9 Q And did you receive the subsequent letter
10 that was sent to your attention at your home address?

11 A Correct.

12 MS. DI GIOVANNI: Okay. Well, give me just
13 a moment to make sure that I've tied up everything
14 here.

15 (Pause.)

16 MS. DI GIOVANNI: All right. Counsel, if
17 you have any redirect you'd like to ask, you can do so
18 now.

19 MR. SPIES: No.

20 MS. DI GIOVANNI: Okay. Well, then I think
21 that we are done here. I'd like to thank you for your
22 cooperation, Mr. Nathanson.

23 THE WITNESS: My pleasure.

24 MS. DI GIOVANNI: Charlie, I will follow up
25 with a list of documents that we'd like you to track