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October 31, 2016

VIA CM/ECF

Honorable John Michael Vazquez, U.S.D.J.
United States District Court for the District of New Jersey
United States Courthouse and Post Office Building
50 Walnut Street
Newark, New Jersey 07102

Re: Democratic National Committee, et al., v. Republican National Committee, et al., Civil Action No.: 81-3876 (JMV)(JBC)

Dear Judge Vazquez:

As discussed during this afternoon's conference call with the Court, plaintiff Democratic National Committee ("DNC") has uncovered evidence that the Republican National Committee ("RNC") – contrary to the sworn declarations submitted earlier today, and the clear statements of its counsel – has and continues to engage in one or more ballot security initiatives utilizing poll watchers in Nevada. The enclosed declarations are being provided today pursuant to the Court's request, and will be discussed more fully in the DNC's reply submission which will be filed later this week.

Thank you for the Court's continued attention to this matter.

Respectfully,

GENOVA BURNS LLC

A handwritten signature in blue ink that reads "Angelo J. Genova / RDP".

ANGELO J. GENOVA

Encls.

c: Rajiv D. Parikh, Esq. (via CM/ECF)
Marc E. Elias, Esq. (via electronic mail)
Joshua L. Kaul, Esq. (via electronic mail)
Mark Sheridan, Esq. (via CM/ECF)