



**U.S. Department of Justice**  
Civil Division  
950 Pennsylvania Ave.  
Washington, DC 20530

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October 25, 2017

**VIA ECF**

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Citizens for Responsibility and Ethics in Washington v. Donald J. Trump*,  
Civil Action No. 1:17-cv-00458-GBD

Dear Judge Daniels:

I write to correct a misstatement I made during the October 18, 2017, hearing on the government's motion to dismiss. Near the conclusion of that hearing (transcript at p. 94, line 11-14), the transcript reflects that I stated that "for purposes of this motion, we are assuming the President is subject to the Domestic Emoluments Clause." In so stating, I intended to refer to the Foreign Emoluments Clause, rather than the Domestic Emoluments Clause. I apologize for the error. As I also stated, the government has not conceded that the President is subject to the Foreign Emoluments Clause. There is, however, a transcription error in that regard.

Respectfully submitted

CHAD A. READLER  
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/s/ Brett Shumate

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