



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

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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