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July 25, 2020

Via email: agenova@genovaburns.com

Angela J. Genova, Esq.
Genova Burns, LLC
494 Broad Street
Newark, N.J. 07102

Re: July 28, 2020 Mercer County Democratic Meeting

Dear Mr. Genova

This firm has been retained to represent the Mercer County Democratic Committee (“MCDC”). Please accept this letter in response to your letter to Chairwoman Janice S. Mironov (“Chairwoman”) dated July 24, 2020.

Specifically, your letter raises three issues concerning the Biennial Organization Meeting (“BOM”) currently scheduled for Tuesday, July 28, 2020 at 6:00 p.m. We have reviewed your concerns and will address them below.

First, any concern that the telephonic nature of the BOM infringes on the right of County Committee members to fully participate in the meeting is without basis and mere speculation. In fact, a significant number of members, in excess of 300 of the approximately 450 plus eligible to vote, have already registered for the BOM. You should know that the MCDC is not alone in its use of Tele Town Hall. Many other organizations use this platform, including neighboring Middlesex County Democratic Committee who used this meeting platform and voting process, for their reorganization meeting last week. County committee members have until 12:00 p.m., July 28, 2020 to register for the BOM.

Secondly, as to your clients' concern over the secrecy of a member's vote, the Chairwoman and her executive committee have taken the necessary steps, during a State of Emergency and Global Pandemic, to ensure that a member's vote remain secret. In that connection, the MCDC has retained the services of the independent third party, ElectionBuddy, to oversee and verify the election and results. I suggest that you review their website at www.electionbuddy.com, where they guarantee that a voter can only vote once and that "voting choices remain anonymous".

Thirdly, your clients raise a concern as to the Chairwoman providing adequate notice to members of the MCDC and adhering to the MCDC bylaws. As to that concern, the selection of both Tele Town Hall and ElectionBuddy to oversee the meeting to ensure ballot secrecy, along with the decision of the MCDC Executive Board to hold the BOM on the first Tuesday after the July primary election results are certified, in accordance with the Governor's Executive Order 164, fully and completely complies with the MCDC bylaws.

Based on the foregoing, we believe that all of your clients' concerns have been fully addressed and, as such, will be withdrawing its objection. However, should you like to discuss this matter further, please feel free to call me on my cell phone at [REDACTED] at any time.

Very truly yours,
ANTONELLI KANTOR, P.C.

By: *Daniel Antonelli*
Daniel Antonelli

By: *Jarrid H. Kantor*
Jarrid H. Kantor

DA/tm

cc: Chairwoman Janice S. Mironov (via email)
Jarrid H. Kantor, Esq. (via email)