

# BROWN & CONNERY, LLP

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April 11, 2019

**Via Email [electdiv@camdencounty.com] & Facsimile [856-374-6398]**

Election Division, Office of the County Clerk  
County of Camden  
Elections & Archive Center  
100 University Ct.  
PO Box 218  
Blackwood, NJ 08012-0218

**Re: Emergent OPRA Request**

To Whom It May Concern:

Our office represents the Camden County Democratic Committee, Inc. ("CCDC") and Freeholder candidates Edward T. McDonnell and Carmen G. Rodriguez (collectively, the "Challengers") in this matter. On April 10, 2019, the Office of the County Clerk issued its Determination of the Challenges to Petitions for the 2019 Democratic Primary. With respect to the Joint Petition of Jennifer O'Donnell & Jerome A. Taylor, Sr. for Freeholder, the following determination was made:

With advice from County Counsel, the petition of Jennifer O'Donnell & Jerome A. Taylor, Sr. for Freeholder is rejected in its entirety as it has been found and confirmed by a Law Enforcement Agency investigation that there were signatures that were ill-gotten on the petitions circulated, verified and submitted by Candidate Taylor.

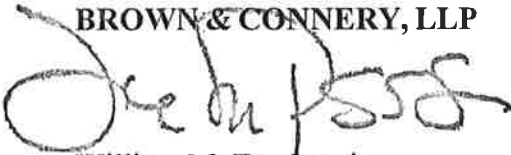
The Challengers hereby request, pursuant to the New Jersey Open Public Records Act ("OPRA"), the production of all documents relied upon by the Office of the Clerk in making this determination to strike the petition of Jennifer O'Donnell & Jerome A. Taylor, Sr. for Freeholder. Due to the time sensitivity of this matter, the Challengers respectfully request the immediate production of the requested records via email to wtambussi@brownconnery.com.

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Thank you for your prompt attention in this matter. Please do not hesitate to contact me should you require anything further.

Very truly yours,

**BROWN & CONNERY, LLP**  
  
William M. Tambussi

MJM