

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA

Plaintiff,

v.

GREGG M. AMORE, in his official  
capacity as Secretary of State of  
Rhode Island,

Defendant.

CASE NO: 1:25-cv-00639-MSM-PAS

CLARIFICATION OF RECORD

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**NOTICE OF CLARIFICATION**

The Court heard argument in this matter on the Defendants' Motions to Dismiss and the United States' Motion to Compel Production of Documents on March 26, 2026. During argument, the Court asked the United States about what actions, if any, had been taken with the nonpublic voter registration data already in its possession.<sup>1</sup> The United States represented that each data set was stored separately. The United States also stated that no analysis had yet been conducted on the data. To correct and clarify the record, preliminary internal data analysis of the nonpublic voter registration data has begun. In particular, Civil Rights Division

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<sup>1</sup> The language used by the Court and the following responses are paraphrased. The United States has ordered a transcript of the proceedings, however it is not available as of this filing. This filing is made without the aid of the transcript as the Court indicated a ruling would quickly issue.

has begun the process of identifying and quantifying the number and type of duplicate and deceased registered voters in each state. The United States continues to keep each data set stored separately. It also has not shared the information with any other agency.

DATED: March 27, 2026.

Respectfully submitted,

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/s/ Christopher J. Gardner  
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## CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2026, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Christopher J. Gardner  
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