

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JULIE SEEGERs,

Plaintiff,

v.

FEDERAL ELECTION COMMISSION,

Defendant.

Civil Action No. 1:26-cv-00276-JMC

Judge Jia M. Cobb

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AGAINST
DEFENDANT FEDERAL ELECTION COMMISSION**

Pursuant to Federal Rule of Civil Procedure 55(b)(2) and 55(d), Local Civil Rule 7, and 52 U.S.C. § 30109(a)(8)(C), Plaintiff Julie Seegers, appearing pro se, respectfully moves this Court for entry of default judgment against Defendant Federal Election Commission (“FEC” or “the Commission”). In support of this Motion, Plaintiff states as follows:

1. On January 30, 2026, Plaintiff commenced this action by filing the Complaint for Declaratory and Injunctive Relief (Dkt. 1), seeking review under 52 U.S.C. § 30109(a)(8) of the Commission's failure to act within 120 days on Plaintiff's sworn administrative complaint against ActBlue (FEC ID C00401224) and its treasurer, George Gilmer, which the Commission received on August 29, 2025 and designated Matter Under Review (“MUR”) 8404.

2. Plaintiff completed service of process pursuant to Federal Rule of Civil Procedure 4(i), and all service was completed within the 90-day period of Rule 4(m). On February 24, 2026, at 2:33 p.m., Ambiko Wallace of Capitol Process Services, Inc. personally served the United States Attorney for the District of Columbia, c/o Civil Process Clerk, 601 D Street, NW, Washington, DC 20530, by delivering the court-stamped Summons and Complaint to Aquilla Alexander,

Paralegal Specialist, authorized to accept service, satisfying Rule 4(i)(1)(A)(i); the process server's sworn Declaration of Service was filed on March 4, 2026 (Dkt. 6, p. 1). On February 24, 2026, at 1:42 p.m., Michael Weaver of Capitol Process Services, Inc. personally served the Federal Election Commission at its principal office, 1050 First Street, NE, Washington, DC, by delivering the court-stamped Summons and Complaint to Joe Clark, Facilities Manager, authorized to accept service on behalf of the Commission; the process server's sworn Declaration of Service was filed on March 4, 2026 (Dkt. 6, p. 2). The Attorney General of the United States was served by United States Postal Service Certified Mail, Return Receipt Requested, Article No. 9414 8362 0855 1295 5585 87, mailed February 23, 2026 and delivered March 4, 2026, satisfying Rule 4(i)(1)(B); the process server's sworn Affidavit of Service by Certified Mail, with USPS proof of delivery, was filed on April 15, 2026 (Dkt. 7).

3. The deadline for the Commission to answer or otherwise respond has expired. Under Federal Rule of Civil Procedure 12(a)(2), an agency of the United States must serve an answer within 60 days after service on the United States Attorney. Based on the February 24, 2026 Rule 4(i)(1)(A) service on the United States Attorney for the District of Columbia, the 60-day period expired on Saturday, April 25, 2026, extended to Monday, April 27, 2026 by Rule 6(a)(1)(C). That deadline has lapsed. The Commission has filed no answer, has filed no motion under Rule 12, and has neither requested nor obtained any enlargement of time under Rule 6(b).

4. The Commission's April 24, 2026 Notice of Lack of Quorum (Dkt. 8) is not a responsive pleading and does not “otherwise defend” within the meaning of Rule 55(a). The Notice does not admit or deny any allegation, asserts no defense, requests no relief, and seeks no extension of time. Its sole stated purpose is to advise the Court that the Commission lacks a quorum and is “without the authority to litigate the merits of plaintiff's Complaint.” (Dkt. 8 ¶ 4.)

5. By Minute Order of May 7, 2026, the Court invited Plaintiff's position on whether this action should be stayed pending restoration of a quorum. On May 20, 2026, Plaintiff filed her Response to Defendant's Notice of Lack of Quorum and Opposition to Any Stay (Dkt. 10). Plaintiff also filed her Declaration in Support of Request for Clerk's Entry of Default on May 18, 2026 (Dkt. 9), her Request for Clerk's Entry of Default with supporting Affidavit and proposed entry on May 20, 2026 (Dkt. 11), and a letter to the Clerk of Court on June 15, 2026 (Dkt. 12).

6. The Clerk of Court has entered default against Defendant Federal Election Commission under Federal Rule of Civil Procedure 55(a). See Clerk's Entry of Default, Dkt. 13, entered July 8, 2026.

7. Because the defendant is an agency of the United States, Plaintiff must "establish[] a claim or right to relief by evidence that satisfies the court." Fed. R. Civ. P. 55(d). Plaintiff has done so. The accompanying Memorandum of Points and Authorities and Declaration of Julie Seegers, with Exhibits A through H listed in the accompanying Exhibit Index, set forth (a) the administrative-phase facts establishing the Commission's receipt of Plaintiff's administrative complaint on August 29, 2025, its acknowledgment and designation of MUR 8404 by letter dated September 26, 2025, and the elapse of the 120-day statutory period on December 27, 2025; (b) the procedural facts establishing service, default, and the absence of any defense; and (c) the legal basis for relief under 52 U.S.C. § 30109(a)(8)(C).

8. Notice under Rule 55(b)(2). Although counsel for the Federal Election Commission filed the April 24, 2026 Notice of Lack of Quorum (Dkt. 8) for the limited purpose of advising the Court that the Commission cannot defend, Plaintiff treats that filing as an appearance "by a representative" for purposes of Rule 55(b)(2) and provides this Motion to counsel of record listed on Dkt. 8 - Lisa J. Stevenson (D.C. Bar No. 457628), Deputy General Counsel - Law; James D.

McGinley (D.C. Bar No. 1017356), Associate General Counsel; Shaina Ward (D.C. Bar No. 1002801), Acting Assistant General Counsel; and Greg J. Mueller (D.C. Bar No. 462840), Attorney, of the FEC Office of General Counsel - together with the accompanying papers, more than seven days before any hearing on this Motion, as reflected in the accompanying Certificate of Service.

9. Plaintiff seeks the relief that Congress prescribed for this exact circumstance: (a) a declaration, under 52 U.S.C. § 30109(a)(8)(C), that the Commission's failure to act on MUR 8404 is contrary to law; (b) an order directing the Commission to conform with that declaration within thirty (30) days, including by certifying any vote and filing any controlling Statement of Reasons sufficient to permit judicial review of any dismissal; (c) authorization, in the event the Commission fails to conform within thirty days, for Plaintiff to bring a civil action under § 30109(a)(8)(C) to remedy the violation involved in the original administrative complaint; (d) retention of jurisdiction over the conformance period; and (e) allowable costs. Plaintiff does not at this stage ask the Court to adjudicate the underlying FECA violations alleged in MUR 8404; that is the subject of the citizen-action remedy that Congress placed in § 30109(a)(8)(C) for use only after a failure of conformance.

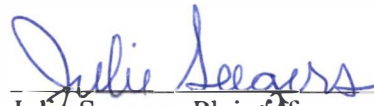
10. Local Civil Rule 7(m) does not apply to this Motion. A motion for default judgment is dispositive, and LCvR 7(m) governs only nondispositive motions. Even if the Rule applied, conferral was not feasible: the Commission has formally represented to this Court that it lacks the quorum required to authorize the defense of this action (Dkt. 8), and no counsel has appeared on behalf of the Commission in any capacity beyond the filing of that Notice.

11. Pursuant to Local Civil Rule 7(a), this Motion is supported by the accompanying Memorandum of Points and Authorities. Pursuant to Local Civil Rule 7(c), this Motion is

accompanied by a [Proposed] Order. Pursuant to Local Civil Rule 7(k), the [Proposed] Order includes a list of the names and addresses of all persons entitled to notice of its entry. An Exhibit Index accompanies the supporting Declaration.

WHEREFORE, Plaintiff respectfully requests that this Court GRANT this Motion for Default Judgment and enter the relief set forth in the accompanying [Proposed] Order Granting Plaintiff's Motion for Default Judgment.

Respectfully submitted,



Julie Seegers, Plaintiff
7729 334th Avenue
Burlington, WI 53105
Telephone: (608) 212-6037
Email: julies53597@yahoo.com

Dated: July 20, 2026