UNITED STATES DISTRICT AND BANKRUPTCY COURTS FOR THE DISTRICT OF COLUMBIA

Joshua Freedman
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VS.

CIVIL ACTION NO. 1:22-cv-01542-RCL

Federal Elections Commission Alan Dickerson, Chair 1050 First Street, NE Washington, DC 20463 District of Columbia 202-694-1100 info@fec.gov cgallagher@fec.gov

Complaint Ammendment

Plaintiff Joshua Freedman hereby amends the complaint previously filed in the above-captioned matter to include the following claims:

- 1. The current enforcement of Federal Election Commission (FEC) rules on federal elections is unconstitutional as corporations are not citizens and do not have the same freedom of speech protections as individuals.
- 2. The Supreme Court's ruling in Citizens United v. Federal Election Commission, 558 U.S. 310 (2010), which held that corporations have the same First Amendment rights as individuals and can therefore spend unlimited amounts of money to influence political campaigns, is unconstitutional.
- 3. The current enforcement of FEC rules and the Citizens United ruling have resulted in a corrupt and undemocratic political system, where the interests of wealthy corporations are prioritized over the interests of the American people.
- 4. The FEC has failed to regulate and enforce federal election laws in a fair and impartial manner, allowing corporations and wealthy individuals to exert undue influence over the political process.
- 5. The continued enforcement of FEC rules and the Citizens United ruling will result in a continued erosion of democracy and the concentration of power in the hands of a few wealthy individuals and corporations.



4/6/2023 Clerk, U.S. District & Bankruptcy Court for the District of Columbia WHEREFORE, Plaintiff Joshua Freedman requests that the Court declare the current enforcement of FEC rules and the Citizens United ruling unconstitutional and order the FEC to regulate and enforce federal election laws in a fair and impartial manner.

Thank you.

GMT 4/6/2023

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