

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

READY FOR RON)	
66 W. Flagler Street)	Judge Randolph D. Moss
Suite 900, #6781)	
Miami, FL 33130,)	No. 1:22-cv-3282-RDM
)	
)	
<i>Plaintiff,</i>)	
)	
v.)	
)	
FEDERAL ELECTION COMMISSION)	
1050 First Street, NE)	
Washington, DC 20463,)	
)	
<i>Defendant.</i>)	
_____)	

PLAINTIFF READY FOR RON’S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff READY FOR RON respectfully moves this Court for a Preliminary Injunction enjoining Defendant FEDERAL ELECTION COMMISSION from conducting any investigation, initiating any administrative or other proceedings, making any criminal referral, imposing any fine or other sanction, or otherwise attempting to enforce 52 U.S.C. § 30116, 11 C.F.R. § 100.72, or 11 C.F.R. § 110.1, against Plaintiff READY FOR RON, or any of its agents, officers, contractors, employees, volunteers, members, supporters, or signatories, for:

- providing a signed political petition including signatories’ names and contact information (including but not limited to addresses, phone numbers, and/or e-mail addresses) to Florida Governor Ron DeSantis to encourage him to become or remain a candidate for President in the 2024 election cycle, regardless of whether Governor DeSantis is “testing the waters” under 11 C.F.R. § 100.72 or has become a candidate under 52 U.S.C. § 30101(2) and 11 C.F.R. § 100.3;

- providing to Governor DeSantis any supplements or updates to the petition containing additional signatories' names and contact information (including but not limited to addresses, phone numbers, and/or e-mail addresses), regardless of whether Governor DeSantis is “testing the waters” under 11 C.F.R. § 100.72 or has become a candidate under 52 U.S.C. § 30101(2) and 11 C.F.R. § 100.3;
- spending funds from its non-contribution *Carey* account in connection with the petition, including but not limited to expenses relating to advertising, signature gathering, robocalls, or hotline maintenance; or
- accepting unlimited contributions to its non-contribution *Carey* account pursuant to this Court’s ruling in *Carey v. FEC*, 864 F. Supp. 2d 57 (D.D.C. 2002).

Plaintiff further moves for a PRELIMINARY INJUNCTION enjoining Defendant FEDERAL ELECTION COMMISSION from enforcing 11 C.F.R. § 100.72, or otherwise applying or enforcing limitations under 52 U.S.C. § 30116 and 11 C.F.R. § 110.1 with regard to the amount or value of any donations, gifts, transfers, or disbursements—regardless of whether they are monetary, non-monetary, or “in-kind”—to an individual who is not a candidate for federal office under 52 U.S.C. § 30101(2) and 11 C.F.R. § 100.3 on the grounds such individual is, was, may be, or may have been “testing the waters” or otherwise considering the possibility of becoming a candidate at the time such donations, gifts, transfers, or disbursements are or were made.

A memorandum of law, supporting declaration with exhibits, and proposed order are attached.

Dated this 21st day of December, 2022.

Respectfully submitted,

/s/ Dan Backer

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*Motion for pro hac vice admission forthcoming
Attorneys for Plaintiff