

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

CAMPAIGN LEGAL CENTER,

Plaintiff,

V.

FEDERAL ELECTION COMMISSION,

Defendant.

Civ. No. 26-1559 (ACR)

ANSWER

DEFENDANT FEDERAL ELECTION COMMISSION'S ANSWER

Defendant Federal Election Commission (“FEC” or “Commission”) submits this Answer to the Complaint for Injunctive and Declaratory Relief (the “Complaint”) filed by plaintiff Campaign Legal Center. (*See* ECF No. 1.) Any allegation not specifically responded to below is DENIED.

COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF¹

1. This paragraph contains descriptions and characterizations of the allegations in plaintiff's Complaint, the Federal Election Campaign Act of 1971, 52 U.S.C. §§ 30101-46 ("FECA" or the "Act"), and FEC Advisory Opinion 2024-01 (Texas Majority PAC), which speak for themselves, and so no response is required. To the extent a response is required, DENY.

2. This paragraph contains descriptions and characterizations of the allegations in plaintiff's Complaint and the Administrative Procedure Act ("APA"), which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that

¹ The FEC has included select headings from the Complaint for the sole purpose of assisting in the reading of this Answer and does not admit any factual allegations in those headings.

plaintiff's Complaint purports to assert a claim under the APA. DENY that the Commission has contravened FECA or violated the APA.

3. This paragraph contains plaintiff's conclusions of law as well as references to, characterizations of, and quotations from a provision of FECA and a judicial opinion, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that the cited provision and judicial opinion contain the quoted text.

4. This paragraph contains plaintiff's references to and characterizations of FEC Advisory Opinion 2024-01 (Texas Majority PAC), and Advisory Opinion Request 2024-01, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that the FEC issued the Advisory Opinion on March 20, 2024. DENY that the Commission contravened FECA.

5. This paragraph contains plaintiff's conclusions of law as well as references to and characterizations of provisions of FECA, which speak for themselves, and so no response is required. To the extent a response is required, DENY that the Commission contravened FECA.

6. This paragraph contains plaintiff's characterizations of legal claims and conclusions of law, to which no response is required. To the extent a response is required, DENY.

7. This paragraph contains plaintiff's characterizations of a judicial opinion and conclusions of law, to which no response is required. To the extent a response is required, ADMIT that this paragraph purports to characterize portions of the holding in *Buckley v. Valeo*, 424 U.S. 1, 46-47 (1976) (per curiam), which speaks for itself. ADMIT that the opinion contains the quoted text.

8. This paragraph contains plaintiff's characterizations of a judicial opinion and conclusions of law, to which no response is required. To the extent a response is required, ADMIT that this paragraph purports to characterize portions of the holding in *Buckley v. Valeo*, 424 U.S. 1, 46-47 (1976) (per curiam), which speaks for itself. ADMIT that the opinion contains the quoted text.

9. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third parties alleged in this paragraph. This paragraph also contains plaintiff's legal arguments and conclusions of law, to which no response is required. To the extent a response is required, DENY.

10. This paragraph contains plaintiff's characterizations of a judicial opinion and conclusions of law, to which no response is required. To the extent a response is required, ADMIT that *Buckley*, 424 U.S. at 66 contains the quoted text. DENY the remainder of this paragraph.

11. ADMIT that plaintiff's Complaint seeks the relief stated in this paragraph. DENY that plaintiff is entitled to any relief.

JURISDICTION AND VENUE

12. ADMIT that this Court has jurisdiction pursuant to 28 U.S.C. § 1331. DENY that plaintiff is entitled to relief under 28 U.S.C. §§ 2201 and 2202 and the APA, 5 U.S.C. §§ 701-706.

13. ADMIT.

PARTIES

14. The Commission is without knowledge or information sufficient to admit or deny the allegations in this paragraph.

15. The Commission is without knowledge or information sufficient to admit or deny the allegations in this paragraph.

16. The Commission is without knowledge or information sufficient to admit or deny the allegations in this paragraph.

17. The Commission is without knowledge or information sufficient to admit or deny the allegations in this paragraph.

18. The Commission is without knowledge or information sufficient to admit or deny the allegations in this paragraph.

19. The Commission is without knowledge or information sufficient to admit or deny the allegations in this paragraph.

20. The Commission is without knowledge or information sufficient to admit or deny the allegations in this paragraph.

21. The Commission is without knowledge or information sufficient to admit or deny the first and second sentences in this paragraph. DENY the remainder of the paragraph.

22. ADMIT.

FACTUAL ALLEGATIONS

23. This paragraph contains plaintiff's conclusions of law as well as references to, characterizations of, and quotations from provisions of FECA and Commission regulations, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that the provisions cited in this paragraph contain the quoted text.

24. This paragraph contains plaintiff's conclusions of law as well as references to, characterizations of, and quotations from provisions of FECA, which speak for themselves, and

so no response is required. To the extent a response is required, ADMIT that the provisions cited in this paragraph contain the quoted text.

25. ADMIT that this paragraph purports to reference and characterize uncited provisions of FECA, which speak for themselves.

26. This paragraph contains plaintiff's conclusions of law as well as references to, characterizations of, and quotations from a judicial opinion, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that *Buckley*, 424 U.S. at 46, contains the quoted text.

27. This paragraph contains plaintiff's conclusions of law as well as references to and characterizations of provisions of FECA, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that coordinated expenditures are subject to certain contribution limits and disclosure requirements under the Act.

28. This paragraph contains plaintiff's conclusions of law as well as references to and characterizations of provisions of FECA and the FEC website, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that the per-election candidate committee contribution limits for 2025-2026 include \$3,500 per election for individuals or non-multicandidate PACs, and \$5,000 per election for multi-candidate PACs, as indexed for inflation. See <https://www.fec.gov/resources/cms-content/documents/contribution-limits-chart-2025-2026.pdf>.

29. This paragraph contains plaintiff's conclusions of law as well as references to and characterizations of a provision of FECA, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that 52 U.S.C. § 30118 states, *inter alia*, that it is

unlawful for “any labor organization, to make a contribution or expenditure” in connection with any Congressional or presidential election or primary.

30. This paragraph contains plaintiff’s conclusions of law as well as references to and characterizations of a Commission regulation, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that 11 C.F.R § 110.9 states, *inter alia*, that it is unlawful for “any labor organization, to make a contribution or expenditure” in connection with any Congressional or presidential election or primary.

31. This paragraph contains plaintiff’s conclusions of law as well as references to, characterizations of, and quotations from provisions of FECA and Commission regulations, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that the provisions cited in this paragraph contain the quoted text.

32. This paragraph contains plaintiff’s conclusions of law as well as references to, and characterizations of a Commission regulation, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that 11 C.F.R. § 109.21 defines and outlines the standards for coordinated communications.

33. This paragraph contains plaintiff’s conclusions of law as well as references to, and characterizations of Commission regulations, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that 11 C.F.R. § 109.21(a), (c), and (d) define and outline the standards of coordinated communications.

34. This paragraph contains plaintiff’s conclusions of law as well as references to, and characterizations of Commission regulations, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that 11 C.F.R. § 109.21(c)

sets forth “content standards,” for coordinated communications and that 11 C.F.R. § 100.26 contains the quoted text.

35. This paragraph contains plaintiff’s conclusions of law as well as references to, and characterizations of Commission regulations, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that 11 C.F.R. § 109.21 and 11 C.F.R. § 100.26 set forth the standards of “coordinated communications” and “public communications.”

36. This paragraph contains plaintiff’s conclusions of law as well as references to, quotations from, and characterizations of Commission regulations, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that 11 C.F.R. § 109.21 sets forth the standards of “coordinated communication” and that 11 C.F.R. § 109.20 contains the quoted text.

37. This paragraph contains plaintiff’s conclusions of law, as well as references to, characterizations of, and quotations from a judicial opinion and a Senate Report, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that *Buckley*, 424 U.S. at 67 and S. Rep. 93-689 contain the quoted text.

38. This paragraph contains plaintiff’s conclusions of law, as well as references to, and characterizations of a provision of FECA, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that 52 U.S.C. § 30104(a)(1) requires the treasurer of a political committee reports to file reports of receipts and disbursements in accordance with the provisions in section 30104.

39. This paragraph contains plaintiff’s conclusions of law, as well as references to, and characterizations of, a provision of FECA, which speaks for itself, and so no response is

required. To the extent a response is required, ADMIT that 52 U.S.C. § 30104 sets forth the reporting requirements for political committees.

40. This paragraph contains plaintiff's conclusions of law, as well as references to, and characterizations of, provisions of FECA and FEC regulations, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that 52 U.S.C. § 30116 contains the quoted text.

41. This paragraph contains plaintiff's conclusions of law as well as references to, quotations from, and characterizations of a Commission regulation, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that 11 C.F.R. § 100.16 contains the quoted text.

42. This paragraph contains plaintiff's legal arguments and conclusions of law, and so no response is required. To the extent a response is required, ADMIT that this paragraph appears to characterize provisions of FECA concerning coordinated and independent expenditures.

43. This paragraph contains plaintiff's legal arguments and conclusions of law, and so no response is required. To the extent a response is required, ADMIT that this paragraph appears to characterize provisions of FECA concerning coordinated and independent expenditures. DENY the second sentence of this paragraph.

44. This paragraph contains plaintiff's conclusions of law as well as references to, characterizations of, and quotations from provisions of FECA, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that the provisions cited in this paragraph contain the quoted text.

45. This paragraph contains plaintiff's conclusions of law as well as references to, characterizations of, and quotations from provisions of FECA, which speak for themselves, and

so no response is required. To the extent a response is required, ADMIT that the provisions cited in this paragraph contain the quoted text.

46. This paragraph contains plaintiff's conclusions of law as well as references to, characterizations of, and quotations from provisions of FECA and a judicial opinion, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that the provisions cited in this paragraph contain the quoted text.

47. ADMIT that Texas Majority PAC filed Advisory Opinion Request 2024-01 (Texas Majority PAC) with the Commission on January 12, 2024, a public document that speaks for itself and to which no further response is required.

48. ADMIT that this paragraph purports to characterize Advisory Opinion Request 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required.

49. ADMIT that this paragraph purports to characterize Advisory Opinion Request 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required.

50. ADMIT that this paragraph purports to characterize Advisory Opinion Request 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required.

51. ADMIT that this paragraph purports to characterize Advisory Opinion Request 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required.

52. ADMIT that this paragraph purports to characterize Advisory Opinion Request 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required.

53. ADMIT that this paragraph purports to characterize Advisory Opinion Request 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required. DENY that the Commission violated the APA or contravened FECA or Commission regulations.

54. ADMIT.

55. ADMIT that this paragraph purports to characterize comments submitted in response to Advisory Opinion Request 2024-01 (Texas Majority PAC), public documents that speak for themselves and to which no further response is required.

56. ADMIT that this paragraph purports to characterize plaintiff's comment submitted in response to Advisory Opinion Request 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required.

57. ADMIT that this paragraph purports to characterize plaintiff's comment submitted in response to Advisory Opinion Request 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required.

58. ADMIT.

59. ADMIT that this paragraph purports to characterize an FEC draft response to Advisory Opinion Request 2024-01 (Texas Majority PAC), Draft A (dated Feb. 21, 2024), <https://www.fec.gov/files/legal/aos/2024-01/202401.pdf>, a public document that speaks for itself and to which no further response is required.

60. ADMIT.

61. ADMIT that this paragraph purports to characterize Advisory Opinion 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required. DENY to the extent that this paragraph's legal arguments and characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations.

62. ADMIT that this paragraph purports to characterize Advisory Opinion 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required. DENY to the extent that this paragraph's legal arguments and characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations.

63. ADMIT that this paragraph purports to characterize Advisory Opinion 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required. This paragraph also contains plaintiff's references to, quotations from, and characterizations of a Commission regulation, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that 11 C.F.R. § 109.20(b) contains the quoted text.

64. ADMIT that this paragraph purports to characterize Advisory Opinion 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required. DENY to the extent that this paragraph's legal arguments and characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations.

65. ADMIT that this paragraph purports to characterize Advisory Opinion 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required. DENY to the extent that this paragraph's legal arguments and characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations. This paragraph also contains plaintiff's references to, quotations from, and characterizations of a

provision of FECA, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that 52 U.S.C. § 30116(a)(7)(B)(i) contains the quoted text.

66. ADMIT that this paragraph purports to characterize Advisory Opinion 2024-01 (Texas Majority PAC), a public document that speaks for itself and to which no further response is required. DENY to the extent that this paragraph’s legal arguments and characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations. This paragraph also contains plaintiff’s references to, quotations from, and characterizations of a provision of FECA, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that 52 U.S.C. § 30116(a)(7)(B)(i) contains the quoted text.

67. ADMIT that this paragraph purports to characterize portions of the holding in *Shays v. FEC*, 414 F.3d 76, 99 (D.C. Cir. 2005) (“*Shays I*”), as well as FECA and a Commission regulation which speak for themselves. This paragraph also contains plaintiff’s legal arguments and conclusions of law, and so no response is required. To the extent a response is required, DENY.

68. ADMIT that this paragraph purports to characterize portions of the holding in *Shays II*, which speaks for itself. ADMIT that *Shays II* contains the quoted text. This paragraph also contains plaintiff’s legal arguments and conclusions of law, and so no response is required. To the extent a response is required, DENY.

69. ADMIT that this paragraph purports to characterize portions of the holding in *Campaign Legal Center v. FEC*, 106 F.4th 1175, 1191 (D.C. Cir. 2024), which speaks for itself. ADMIT that *Campaign Legal Center*, 106 F.4th at 1191 contains the quoted text. This paragraph also contains plaintiff’s legal arguments and conclusions of law, and purports to

characterize Advisory Opinion 2024-01 (Texas Majority PAC), and so no response is required. To the extent a response is required, DENY.

70. ADMIT that this paragraph purports to characterize Advisory Opinion 2024-01 (Texas Majority PAC) and Commission regulations, which speak for themselves. This paragraph also contains plaintiff's legal arguments and conclusions of law, and so no response is required. DENY to the extent that this paragraph's characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations..

71. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by candidates, political parties, and other third-party groups in this paragraph. DENY to the extent that this paragraph's characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations.

72. ADMIT that this paragraph purports to characterize press releases and news articles, public documents which speak for themselves. DENY to the extent that this paragraph's characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations.

73. ADMIT that this paragraph purports to characterize a news article, a public document which speaks for itself. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third parties in this paragraph. DENY to the extent that this paragraph's characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations.

74. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. DENY to the extent that

this paragraph's characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations.

75. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. ADMIT that this paragraph purports to characterize FEC reports, public documents which speak for themselves.

76. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. ADMIT that this paragraph purports to characterize FEC reports, public documents which speak for themselves.

77. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. ADMIT that this paragraph purports to characterize FEC reports, public documents which speak for themselves. DENY to the extent that this paragraph's characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations.

78. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. DENY to the extent that this paragraph's characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations.

79. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. ADMIT that this paragraph purports to characterize IRS forms and a website, public documents which speak for themselves.

80. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. ADMIT that this

paragraph purports to characterize social media posts and news articles, public documents which speak for themselves.

81. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. ADMIT that this paragraph purports to characterize news articles, public documents which speak for themselves.

82. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. ADMIT that this paragraph purports to characterize FEC reports, public documents which speak for themselves. DENY to the extent that this paragraph's characterizations imply that the FEC violated the APA or contravened FECA or Commission regulations.

83. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. ADMIT that this paragraph purports to characterize FEC reports, public documents which speak for themselves.

84. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. DENY that the Commission violated plaintiff's "informational rights under FECA."

85. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. ADMIT that this paragraph purports to characterize FEC reports and news articles, public documents which speak for themselves.

86. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. ADMIT that this

paragraph purports to characterize FEC reports and news articles, public documents which speak for themselves.

87. The Commission is without knowledge or information sufficient to admit or deny the allegations regarding the actions by third-parties in this paragraph. DENY the remainder of this paragraph.

88. This paragraph repeats paragraphs 1-87 of the Complaint. The Commission repeats and realleges its responses to paragraphs 1-87 as if set forth fully herein.

89. This paragraph contains plaintiff's conclusions of law, to which no response is required. To the extent a response is required, ADMIT.

90. This paragraph contains plaintiff's conclusions of law, as well as references to, and characterizations of judicial opinions to which no response is required. To the extent a response is required, ADMIT that the issuance of Advisory Opinion 2024-01 (Texas Majority PAC) preceded this lawsuit.

91. This paragraph contains plaintiff's conclusions of law as well as references to, characterizations of, and quotations from 5 U.S.C. § 706(2)(A) of the APA, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that the section 706(2)(A) contains the quoted text.

92. This paragraph contains plaintiff's references to and characterizations of, FEC Advisory Opinion 2024-01 (Texas Majority PAC), which speaks for itself, and so no response is required. The paragraph also contains plaintiff's references to, quotations from, and characterizations of judicial opinions to which no response is required. To the extent a response is required, ADMIT that the judicial opinions contain the quoted text, DENY that the Commission violated the APA or contravened FECA or Commission regulations.

93. This paragraph contains plaintiff's conclusions of law, as well as references to, and characterizations of, a provision of FECA and *Shays II*, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that *Shays II* contains the quoted text.

94. This paragraph contains plaintiff's conclusions of law, as well as references to, and characterizations of, a provision of FECA and *FEC v. Democratic Senatorial Campaign Committee*, 454 U.S. 27, 32 (1981), which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that the judicial opinion contains the quoted text. DENY the remainder of the paragraph.

95. DENY

96. This paragraph repeats paragraphs 1-95 of the Complaint. The Commission repeats and realleges its responses to paragraphs 1-95 as if set forth fully herein.

97. This paragraph contains plaintiff's conclusions of law as well as references to, characterizations of, and quotations from 5 U.S.C. § 706(2)(A) of the APA, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that section 706(2)(A) contains the quoted text.

98. This paragraph contains plaintiff's references to, characterizations of, and quotations from judicial opinions, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that the judicial opinions contain the quoted text.

99. DENY.

100. DENY.

101. This paragraph contains plaintiff's references to, characterizations of, and quotations from a judicial opinion, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that the judicial opinion contains the quoted text.

102. DENY.

103. DENY.

104. DENY.

105. DENY.

REQUESTED RELIEF

The Requested Relief section of the Complaint contains plaintiff's legal arguments and conclusions, which speak for themselves, and so no response is required. To the extent a response is required, DENY that the FEC's approval of Advisory Opinion 2024-01 (Texas Majority PAC) was "contrary to law and arbitrary and capricious, in violation of FECA and the APA;" DENY that the Court should "vacate and set aside" Advisory Opinion 2024-01 (Texas Majority PAC); DENY that plaintiff should be awarded costs and reasonable attorney's fees in this action; DENY that plaintiff is entitled to the relief requested or any other relief.

AFFIRMATIVE DEFENSES

1. The Court lacks subject-matter jurisdiction over plaintiff's claims.
2. The Complaint fails to state a claim upon which relief may be granted.

Respectfully submitted,

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