

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
JOACHIM WILLIAM LLOP,)	
)	
Plaintiff,)	Civ. No. 26-0051 (TSC)
)	
v.)	
)	
FEDERAL ELECTION COMMISSION,)	
)	
)	MOTION TO DISMISS
)	
Defendant.)	
_____)	

**DEFENDANT FEDERAL ELECTION COMMISSION’S
MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION
AND FAILURE TO STATE A CLAIM**

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and (6), defendant Federal Election Commission moves to dismiss the Complaint filed by pro se plaintiff Joachim William Llop. (Pl’s Compl. for Declaratory and Injunctive Relief (“Compl.”) (ECF 1).)

Mr. Llop seeks broad and unspecific relief, declaring the “challenged framework” unconstitutional, and requests that the Court enjoin enforcement of the federal campaign finance contribution limits. (*Id.*) Mr. Llop lacks Article III standing, fails to state a claim on which relief can be granted, and, in any event, his claims are foreclosed by precedent. Accordingly, this action should be dismissed. A supporting memorandum of points and authorities and a proposed order accompany this motion.

Respectfully submitted,

Lisa J. Stevenson (D.C. Bar No. 457628)
Deputy General Counsel – Law
lstevenson@fec.gov

/s/ Greg J. Mueller
Greg J. Mueller (D.C. Bar No. 462840)
Attorney
gmueller@fec.gov

James D. McGinley (D.C. Bar No. 1017536) COUNSEL FOR DEFENDANT
Associate General Counsel FEDERAL ELECTION COMMISSION
jmcginley@fec.gov 1050 First Street, NE

Shaina Ward (D.C. Bar No. 1002801)
Acting Assistant General Counsel
sward@fec.gov

Washington, DC 20463
(202) 694-1650

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