

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

_____)	
AB PAC,)	
)	
Plaintiff,)	Civ. No. 22-2139 (TJK)
)	
v.)	
)	MOTION TO DISMISS
FEDERAL ELECTION COMMISSION,)	
)	
Defendant.)	
_____)	

**FEDERAL ELECTION COMMISSION’S PARTIAL MOTION
TO DISMISS AMENDED COMPLAINT**

Pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, the Federal Election Commission (“FEC” or “Commission”) hereby moves for an order dismissing the portion of plaintiff’s amended complaint alleging that the Commission has unlawfully failed to act on an administrative complaint plaintiff filed alleging that former president Donald J. Trump violated 52 U.S.C. § 30116(f) by accepting excessive contributions from his leadership PAC and a joint fundraising committee because plaintiff has not established Article III standing to obtain any relief on this portion of its claim. A supporting memorandum and a proposed order accompany this motion.

Respectfully submitted,

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