

**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  
RESPONSE TO MOTION TO DISMISS

Federal Elections Commission  
Alan Dickerson, Chair  
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District of Columbia  
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**PLAINTIFF'S RESPONSE TO THE DEFENDANT FEDERAL ELECTION COMMISSION'S  
MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION**

I am writing to express my strong objection to the Federal Election Commission's (FEC) motion to dismiss for lack of subject matter and jurisdiction under 52 USC Section 30109(a)(8)(A), particularly with respect to the late complaint, standing of the Plaintiff, and the jurisdiction of the DC court.

Firstly, I would like to address the issue of the late complaint. This was originally filed in the PA Middle District which I believe was filed within the statute of limitations. While it is true that the complaint may be time-barred, due to the pro se nature of the Complainant, it is important to note that the Complainant may not have been aware of the applicable deadline. Additionally, it is not uncommon for pro se litigants to make mistakes in the legal process. Therefore, I urge the FEC and the Court to exercise its discretion to consider the merits of the complaint rather than dismissing it based solely on procedural grounds.

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2/27/2023

Clerk, U.S. District & Bankruptcy  
Court for the District of Columbia

Secondly, I strongly disagree with the FEC's assertion that the Court lacks jurisdiction to order the FEC to conduct a proper investigation in this matter. While the original Defendant may not have responded to the FEC, this does not absolve the FEC of its duty to investigate potential campaign finance violations.

Moreover, it is well-established that the FEC has a duty to enforce the Federal Election Campaign Act (FECA) and investigate potential violations of campaign finance laws. If the FEC does not conduct a proper investigation, it is the responsibility of the DC court to ensure that the FEC fulfills its statutory obligations.

Next, I strongly disagree with the assertion that Plaintiff fails to show he has standing. If I don't have standing, then who does? I was a party to the original complaint that I'm asking the Court to order the FEC to investigate.

Finally, I would like to emphasize the importance of the DC court's jurisdiction in this matter. The DC court has the authority to enforce compliance with federal campaign finance laws, and it is critical that the court exercises this authority to protect the integrity of our democratic process. Dismissing this case on jurisdictional grounds would undermine the power of the court to ensure that campaign finance laws are upheld. **In the original complaint, I asserted that Reddit worked with campaigns, and gave them a thing of value at market or below market rate which is tantamount to a campaign donation, for the purpose of manipulating elections, and did not disclose the donations. Reddit never responded to the complaint and the FEC closed the case.**

In conclusion, I respectfully object to the FEC's motion to dismiss for lack of subject matter and jurisdiction under 52 USC Section 30109(a)(8)(A), and urge the FEC and the Court to consider

the merits of the complaint and conduct a proper investigation. I also urge the DC court to assert its jurisdiction in this matter to enforce compliance with federal campaign finance laws.

Thank you.  2/27/2023

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