

RECEIVED
MAILROOM

MAY 18 2026

Angela D. Caesar, Clerk
U.S. District & Bankruptcy Courts
for the District of Columbia

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JULIE SEEGER, S,
Plaintiff,

Civil Action No. 1:26-cv-00276-JMC

v.

FEDERAL ELECTION COMMISSION,
Defendant.

**DECLARATION IN SUPPORT OF REQUEST FOR CLERK'S
ENTRY OF DEFAULT UNDER FED. R. CIV. P. 55(a)**

Plaintiff Julie Seegers submits this sworn declaration in support of her request that the Clerk enter default against Defendant Federal Election Commission ("FEC") under Federal Rule of Civil Procedure 55(a).

1. I am the Plaintiff in this action, appearing pro se. I make this declaration based on personal knowledge and on my review of the docket and the filings in Case No. 1:26-cv-00276-JMC and my records.
2. Procedural history. The Complaint was filed and entered on the docket on January 30, 2026 (Dkt. 1). The Clerk issued the original summons on January 30, 2026 (Dkt. 2), and issued additional summonses for the United States Attorney for the District of Columbia and the Attorney General of the United States on February 13, 2026 (Dkt. 5).
3. Rule 4(i)(2) service – Defendant Federal Election Commission. On February 24, 2026, at 1:42 p.m., Michael Weaver of Capitol Process Services, Inc. personally served the Federal Election Commission at its principal office, 1050 First Street, NE, Washington, DC 20002, with the court-stamped Summons and Complaint for Declaratory and Injunctive Relief, together with Exhibit 1 and attachments, by delivering them to Joe Clark, Facilities

- Manager, who was authorized to accept service on behalf of the Commission. The process server's sworn Declaration of Service was filed on March 4, 2026 (Dkt. 6).
4. Rule 4(i)(1)(A) service – United States Attorney for the District of Columbia. On February 24, 2026, at 2:33 p.m., Ambiko Wallace of Capitol Process Services, Inc. personally served the United States Attorney for the District of Columbia, c/o Civil Process Clerk, 601 D Street, NW, Washington, DC 20530, with the court-stamped Summons and Complaint for Declaratory and Injunctive Relief, together with Exhibit 1 and attachments, by delivering them to Aquilla Alexander, Paralegal Specialist, who was authorized to accept service. The process server's sworn Declaration of Service was filed on March 4, 2026 (Dkt. 6).
 5. Rule 4(i)(1)(B) service – Attorney General of the United States. Angela H. Croson of Capitol Process Services, Inc., of Greenbelt, Maryland, served the Attorney General of the United States by United States Postal Service Certified Mail, Return Receipt Requested, addressed to the U.S. Department of Justice, 950 Pennsylvania Avenue, NW, Washington, DC 20530, mailed on February 23, 2026, USPS Article No. 9414 8362 0855 1295 5585 87. The mailing was delivered to and signed for at the U.S. Department of Justice on March 4, 2026, as confirmed by the USPS proof of delivery. The process server's sworn Affidavit of Service by Certified Mail, with the USPS proof of delivery attached, was filed on April 15, 2026 (Dkt. 7).
 6. Compliance with Rule 4(i). The service described in paragraphs 3 through 5 satisfies Rule 4(i)(2). To serve a United States agency, Plaintiff was required to (i) serve the United States, and (ii) send a copy of the summons and complaint by registered or certified mail to the agency. Plaintiff served the United States by (a) delivering a copy of the summons and complaint to the United States Attorney for the District of Columbia, see Fed. R. Civ. P. 4(i)(1)(A)(i), and (b) sending a copy of the summons and complaint by certified mail to the Attorney General of the United States, see Fed. R. Civ. P. 4(i)(1)(B). Plaintiff also served the Federal Election Commission directly. See Fed. R. Civ. P. 4(i)(2). All three components were effected within the 90-day period prescribed by Rule 4(m).
 7. Response deadline under Rule 12(a)(2). Federal Rule of Civil Procedure 12(a)(2) requires a United States agency, or a United States officer or employee sued only in an official

capacity, to serve an answer to a complaint within 60 days after service on the United States Attorney. Based on the February 24, 2026 Rule 4(i)(1)(A) service on the United States Attorney for the District of Columbia (Dkt. 6), the 60-day period for the FEC to answer or otherwise respond to the Complaint expired on April 27, 2026 (April 25, 2026 being a Saturday; the period accordingly runs to the next business day under Fed. R. Civ. P. 6(a)(1)(C)).

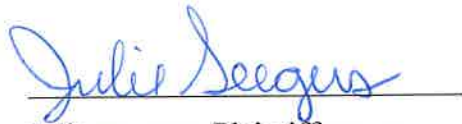
8. No answer or Rule 12 motion has been filed. As of the date of this declaration, the docket does not reflect that Defendant has served or filed any answer, any motion under Federal Rule of Civil Procedure 12, or any other responsive pleading directed to the Complaint.
9. Any “Notice of Lack of Quorum” is not a pleading and does not “otherwise defend.” To the extent the Federal Election Commission has filed, or may hereafter file, a document styled “Notice of Lack of Quorum” or any similar advisory notice in this action, such a filing: (a) is not styled as, and does not purport to be, an answer under Rule 8(b) or a motion under Rule 12; (b) does not admit or deny any allegation of the Complaint; (c) does not seek dismissal, a more definite statement, judgment on the pleadings, or any other relief; and (d) does not request an extension of time to respond. Such a filing is, on its face, an advisory notice of the Commission’s inability to defend, and is therefore not a “pleading” or other step to “otherwise defend” within the meaning of Rule 55(a).
10. No extension has been sought or granted. The docket does not reflect that Defendant has obtained, or has moved for, an order enlarging its time to answer or otherwise respond to the Complaint.
11. Rule 55(a) standard. Federal Rule of Civil Procedure 55(a) provides: “When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.” The showing required by Rule 55(a) is made here.
12. Request. Plaintiff respectfully requests that the Clerk enter default against Defendant Federal Election Commission under Federal Rule of Civil Procedure 55(a). This request is without prejudice to any subsequent motion practice concerning default judgment under

Rule 55(b) and Rule 55(d), or any motion the Defendant may file to set aside an entry of default.

VERIFICATION

I, Julie Seegers, declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct based on my personal knowledge, my review of the docket in this action, and the filings referenced above.

Executed on May 12, 2026.



Julie Seegers, Plaintiff pro se
7729 334th Avenue
Burlington, WI 53105
Telephone: (608) 212-6037
Email: julies53597@yahoo.com

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JULIE SEEGERs,

Plaintiff,

Civil Action No. 1:26-cv-00276-JMC

v.

FEDERAL ELECTION COMMISSION,

Defendant.

**CLERK'S ENTRY OF DEFAULT
UNDER FED. R. CIV. P. 55(a)**

Upon the Declaration of Plaintiff Julie Seegers in Support of Request for Clerk's Entry of Default, and upon review of the record in this action, it appearing that Defendant Federal Election Commission has failed to plead or otherwise defend as provided by Federal Rule of Civil Procedure 55(a),

IT IS HEREBY ENTERED, pursuant to Federal Rule of Civil Procedure 55(a), that default is entered against Defendant Federal Election Commission.

Date: 5/12/26

ANGELA D. CAESAR

Clerk of Court

Julie Seegers

By:

Deputy Clerk

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JULIE SEEGERs,
Plaintiff,

Civil Action No. 1:26-cv-00276-JMC

v.
FEDERAL ELECTION COMMISSION,
Defendant.

RECEIVED
MAILROOM

MAY 18 2026

Angela D. Caesar, Clerk
U.S. District & Bankruptcy Courts
for the District of Columbia

CERTIFICATE OF SERVICE

I, Julie Seegers, Plaintiff pro se, hereby certify under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that on May 12, 2026, a true and correct copy of the foregoing Plaintiff's Request for Clerk's Entry of Default Under Fed. R. Civ. P. 55(a), the Declaration of Julie Seegers in Support thereof, and the Proposed Clerk's Entry of Default, were served by United States Postal Service First-Class Mail, postage prepaid, upon the following:

Federal Election Commission
Office of General Counsel
1050 First Street, NE
Washington, DC 20463

and upon the United States by United States Postal Service First-Class Mail, postage prepaid, addressed as follows:

Civil Process Clerk
U.S. Attorney's Office for the District of Columbia
601 D Street, NW
Washington, DC 20530

Attorney General of the United States
U.S. Department of Justice – Civil Process Clerk
950 Pennsylvania Avenue, NW
Washington, DC 20530

Executed on May 12, 2026.



Julie Seegers, Plaintiff pro se
7729 334th Avenue
Burlington, WI 53105
Telephone: (608) 212-6037
Email: julies53597@yahoo.com

RECEIVED
MAILROOM

MAY 18 2026

Angela D. Caesar, Clerk
U.S. District & Bankruptcy Courts
for the District of Columbia

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JULIE SEEGER,)
)
Plaintiff,)

Civ. No. 26-276 (JMC)

FEDERAL ELECTION COMMISSION,)
)
Defendant.)
_____)

NOTICE OF LACK OF QUORUM

DEFENDANT FEDERAL ELECTION COMMISSION'S NOTICE
OF LACK OF QUORUM

1. Defendant Federal Election Commission ("FEC" or "Commission") submits this Notice to the Complaint for Declaratory and Injunctive Relief filed by pro se plaintiff Julie Seegers, in which plaintiff challenges the FEC's alleged delay in acting on an administrative complaint under 52 U.S.C. 30109(a)(8)(A) of the Federal Election Campaign Act ("FECA").

2. FECA provides for six voting Commissioners, 52 U.S.C. 30106(a). On April 30, 2025, former Commissioner Allen Dickerson resigned from the FEC upon the expiration of

his term. This resignation left the Commission with only three Commissioners.¹ On October 3,

2025, former Commissioner James E. "Trey" Trainor resigned from the FEC, leaving the Commission with only two Commissioners.²

1 See Statement of Allen J. Dickerson Upon the Conclusion of his Term (Apr. 30, 2025), available at <https://www.fec.gov/resources/cms-content/documents/Statement-CommissionerAllen-J-Dickerson-Upon-Conclusion-of-Term.pdf>.

2 See <https://www.washingtonexaminer.com/news/washington-secrets/3823999/treytrainor-resigns-fec-2026-elections/>.

Case 1:26-cv-00276-JMC Document 8

2 2

3. The authority for the Commission to conduct an investigation on an administrative matter or defend a civil action brought under 52 U.S.C. 30109(a)(8)(A) requires the affirmative votes of four members of the Commission. 52 U.S.C 30107(a)(6); see also 52 U.S.C. 30106(c). Thus, as of May 1, 2025, the Commission is without a quorum and unable to authorize defense of this action. On February 11, 2026, President Trump announced the nominations of two new Commissioners.¹ Should Congress confirm the nominations of the two new Commissioners, the Commission will regain its quorum. Those nominations remain pending as of April 24, 2026.

4. This notice is given for the sole purpose of notifying the Court that the Commission lacks a quorum and is without the authority to litigate the merits of plaintiff's Complaint.

Respectfully submitted,

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

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

James D. McGinley (D.C. Bar No. 1017356) /s/ Greg J. Mueller
Associate General Counsel

Greg J. Mueller (D.C. Bar No. 462840)

¹ See <https://www.whitehouse.gov/presidential-actions/2026/02/nominations-sent-to-the-senate-b65f/>.

jmcginley@fec.gov

Attorney
gmueller@fec.gov
COUNSEL FOR DEFENDANT
FEDERAL ELECTION COMMISSION
1050 First street, NE
Washington, DC 20463
(202) 694-1650

April 24, 2026

Case 1:26-cv-00276-JMC Document 8-1

1 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

)	
JULIE SEEGERs,)	
)	
Plaintiff,)	Civ. No. 26-276 (JMC)

)	
FEDERAL ELECTION COMMISSION,)	
)	
Defendant.)	CERTIFICATE OF SERVICE
)	

CERTIFICATE OF SERVICE

Pursuant to Local Civil Rule 5.4(d)(2), I hereby certify that on April 24, 2026, I caused to

have served on pro se plaintiff Julie Seegers a copy of the Federal Election Commission's Notice

of Lack of Quorum, which was electronically filed on April 24, 2026 with the Clerk of the United States District Court for the District of Columbia by using the Court's CM/ECF system.

This document was also served on the plaintiff by UPS at the following address listed on

the docket:

Julie Seegers
7729 334th Avenue
Burlington, WI 53105

Respectfully submitted,

/s/ Greg J. Mueller

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