

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JULIE SEEGERs,

Plaintiff,

v.

FEDERAL ELECTION COMMISSION,

Defendant.

Case: 1:26-cv-00276

Assigned To : Cobb, Jia M.

Assign. Date : 1/30/2026

Description: Pro Se Gen. Civ. (F-DECK)

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF
(52 U.S.C. § 30109(a)(8)(A), (C))

Plaintiff Julie Seegers alleges as follows:

I. PRELIMINARY STATEMENT

1. This action is brought under the Federal Election Campaign Act of 1971, as amended, 52 U.S.C. § 30109(a)(8)(A) and (C), to obtain judicial review of the Federal Election Commission's failure to act on Plaintiff's sworn administrative complaint.
2. On August 29, 2025, Plaintiff filed a verified, sworn administrative complaint with the Commission alleging violations of federal campaign finance law by ActBlue, FEC ID C00401224, and its treasurer, George Gilmer.
3. The 120-day statutory period beginning on the date Plaintiff filed her administrative complaint expired on December 27, 2025. The Commission has not taken any final action on Plaintiff's administrative complaint within the meaning of 52 U.S.C. § 30109(a)(8).
4. Plaintiff is filing this civil action within the 60 days after December 27, 2025, as required by 52 U.S.C. § 30109(a)(8)(A).

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5. The Commission's continued inaction constitutes a failure to act that is contrary to law.

II. NATURE OF THE ACTION

6. FECA permits any party aggrieved by the Commission's dismissal of an administrative complaint, or by the Commission's failure to act on such a complaint during the 120-day period beginning on the date the complaint is filed, to seek judicial review in this Court. 52 U.S.C. § 30109(a)(8)(A).
7. Plaintiff seeks a declaration that the Commission's failure to act on Plaintiff's administrative complaint within the statutory period is contrary to law, and an order directing the Commission to conform with that declaration within thirty days. 52 U.S.C. § 30109(a)(8)(C).
8. Plaintiff will provide statutory notice of this action to the Commission and to the respondents named in the underlying administrative complaint.

III. JURISDICTION AND VENUE

9. This Court has subject matter jurisdiction pursuant to 52 U.S.C. § 30109(a)(8)(A).
10. This Court also has jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 2201.
11. Venue lies exclusively in this District pursuant to 52 U.S.C. § 30109(a)(8)(A).

IV. PARTIES

12. Plaintiff Julie Seegers is a citizen of the United States and the complainant who filed the administrative complaint at issue. Plaintiff is a party aggrieved within the meaning of 52 U.S.C. § 30109(a)(8)(A).

13. Defendant Federal Election Commission is an independent agency of the United States government established by 52 U.S.C. § 30106, with its principal office located at 1050 First Street, NE, Washington, D.C. 20463. The Commission is charged with administering, interpreting, and civilly enforcing FECA.
14. The interested parties in the underlying administrative matter, and the respondents named in Plaintiff's administrative complaint, are ActBlue, FEC ID C00401224, and its treasurer George Gilmer.

V. STANDING

15. Plaintiff has standing because FECA confers a statutory right on a complainant to obtain timely Commission action on a properly filed administrative complaint, and Plaintiff has been directly injured by the Commission's failure to act within the 120-day period mandated by Congress.
16. Plaintiff also suffers an informational injury. Plaintiff's administrative complaint seeks enforcement of FECA provisions requiring accurate disclosure of contributor identity and related information in connection with contributions processed and reported through ActBlue. The Commission's failure to act deprives Plaintiff of information Congress required to be made public through lawful reporting and enforcement mechanisms. *FEC v. Akins*, 524 U.S. 11 (1998).
17. Plaintiff uses federal campaign finance disclosure information to evaluate political committees and candidates to question the true source of political donations. The Commission's continued failure to take final action on Plaintiff's administrative complaint causes concrete and ongoing harm. *Common Cause v. FEC*, 842 F.2d 436 (D.C. Cir. 1988).

VI. STATUTORY AND REGULATORY FRAMEWORK

18. FECA permits any person who believes a violation has occurred to file a sworn administrative complaint with the Commission. 52 U.S.C. § 30109(a)(1); 11 C.F.R. § 111.4.
19. Upon receipt of a complaint, the Commission must notify the respondent and provide an opportunity to respond. 52 U.S.C. § 30109(a)(1); 11 C.F.R. § 111.6.
20. The Commission must determine, by an affirmative vote of four Commissioners, whether there is reason to believe a violation has occurred. 52 U.S.C. § 30109(a)(2).
21. If the Commission fails to act on a complaint during the 120-day period beginning on the date the complaint is filed, the complainant may seek judicial review in this Court. 52 U.S.C. § 30109(a)(8)(A).
22. A failure to act includes the failure to make a reason-to-believe determination, the failure to vote to dismiss, or the failure to take any final action resolving the complaint. *Common Cause v. FEC*, 842 F.2d 436 (D.C. Cir. 1988).
23. If this Court declares that the Commission's failure to act is contrary to law, the Court shall remand the matter and may direct the Commission to conform within thirty days. 52 U.S.C. § 30109(a)(8)(C).

VII. FACTUAL BACKGROUND

A. The administrative complaint

24. On August 29, 2025, Plaintiff filed a verified, sworn administrative complaint with the Commission pursuant to 52 U.S.C. § 30109(a)(1).

25. Plaintiff's administrative complaint named ActBlue, FEC ID C00401224, and ActBlue's treasurer George Gilmer as respondents.
26. Plaintiff's administrative complaint alleged violations of FECA based on ActBlue's acceptance and reporting of contributions, including violations of 52 U.S.C. § 30122 and 52 U.S.C. § 30104, and any related provisions specifically identified in Plaintiff's administrative complaint.
27. Plaintiff's administrative complaint was supported by exhibits and transaction-level materials specific to ActBlue activity described in the complaint, including analyses and documentation submitted with the sworn complaint.

B. Commission acknowledgment and failure to act

28. By letter dated September 26, 2025, the Commission acknowledged receipt of Plaintiff's administrative complaint and assigned it Matter Under Review No. 8394.
29. The 120-day statutory period under 52 U.S.C. § 30109(a)(8)(A) began on August 29, 2025, the date Plaintiff filed the administrative complaint.
30. The 120-day period expired on December 27, 2025.
31. As of the filing of this civil action, the Commission has not taken action resolving Plaintiff's administrative complaint within the 120 days.
32. The Commission has not made a reason-to-believe determination, voted to dismiss the complaint, entered into conciliation, or taken any other final action communicated to Plaintiff that resolves the administrative complaint.
33. Plaintiff has received no statement of reasons, dismissal, or other final disposition constituting final agency action within the meaning of 52 U.S.C. § 30109(a)(8).

VIII. CLAIM FOR RELIEF

(Failure to Act Contrary to Law, 52 U.S.C. § 30109(a)(8))

34. Plaintiff incorporates by reference paragraphs 1 through 33.

35. The Commission's failure to act on Plaintiff's administrative complaint during the 120-day period beginning on August 29, 2025 constitutes a failure to act within the meaning of 52 U.S.C. § 30109(a)(8)(A).

36. The Commission's failure to take final action is contrary to law within the meaning of 52 U.S.C. § 30109(a)(8)(C) because FECA requires the Commission to proceed through the statutory enforcement framework on properly filed complaints, and the Commission may not defeat that framework through prolonged inaction.

37. Plaintiff is entitled to declaratory and injunctive relief under 52 U.S.C. § 30109(a)(8)(C).

IX. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

A. Declare that the Federal Election Commission's failure to act on Plaintiff's administrative complaint regarding ActBlue, FEC ID C00401224, and Treasurer George Gilmer is contrary to law under 52 U.S.C. § 30109(a)(8)(C);

B. Remand this matter to the Commission and order it to conform with the Court's declaration within thirty days, as required by 52 U.S.C. § 30109(a)(8)(C);

C. Retain jurisdiction to ensure compliance with the Court's order;

D. Award Plaintiff costs as permitted by law; and

E. Grant such other and further relief as the Court deems just and proper.

X. EXHIBITS

Exhibit 1. FEC acknowledgment letter dated September 26, 2025 (MUR No. 8394)

Exhibit 2. Plaintiff's verified, sworn administrative complaint dated August 29, 2025

Exhibit 3. Supporting exhibits submitted with the administrative complaint

VERIFICATION

I, Julie Seegers, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief. Per 28 U.S.C. 1746.

Executed on January 26, 2026.



Julie Seegers
Plaintiff, pro se
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