

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

JOACHIM WILLIAM LLOP,
Plaintiff, Pro Se,
310 Glen Lake Drive
Atlanta, GA 30327

Case: 1:26-cv-00051
Assigned To : Chutkan, Tanya S.
Assign. Date : 1/7/2026
Description: Pro Se Gen. Civ. (F-DECK)

v.

FEDERAL ELECTION COMMISSION,
Defendant.

Civil Action No. _____

PLAINTIFF'S COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

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Mailroom

JAN - 7 2026

Angela D. Caesar, Clerk of Clerk
U.S. District Court, District of Columbia

TABLE OF AUTHORITIES

Cases

Bolling v. Sharpe, 347 U.S. 497 (1954)
Buckley v. Valeo, 424 U.S. 1 (1976)
Citizens United v. FEC, 558 U.S. 310 (2010)
McCutcheon v. FEC, 572 U.S. 185 (2014)

Statutes and Constitutional Provisions

U.S. Const. amends. I & V
28 U.S.C. §§ 1331, 2201–2202
52 U.S.C. § 30116 et seq.

QUESTIONS PRESENTED

1. Whether the First Amendment permits a federal campaign-finance system that strictly limits direct political contributions by individual citizens while allowing those same individuals, acting through political action committees or nonprofit entities, to raise and expend unlimited funds.
2. Whether such a system violates the equal-protection component of the Fifth Amendment by granting greater expressive capacity to individuals who act through artificial entities than to those who speak as natural persons.

STATEMENT OF FACTS

Plaintiff is a United States citizen and eligible voter subject to strict individual contribution limits under the Federal Election Campaign Act (FECA). While Plaintiff's direct contributions are capped, federal law permits individuals to create, fund, or control political action committees and nonprofit organizations that may engage in unlimited independent expenditures.

In practice, these entities function as conduits for the same individuals otherwise constrained by personal limits, allowing effective circumvention of FECA's contribution caps and producing unequal political influence among citizens.

COUNT I — VIOLATION OF THE FIRST AMENDMENT

The First Amendment protects the right of individuals to engage in political expression and association. By permitting unlimited political spending through entities while restricting individuals, the current framework burdens individual expression relative to identical speech conducted through artificial entities.

COUNT II — VIOLATION OF THE FIFTH AMENDMENT (EQUAL PROTECTION)

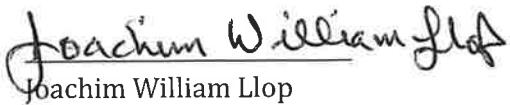
The Fifth Amendment prohibits arbitrary distinctions by the federal government. Treating individuals differently based solely on whether they act directly or through an entity creates unconstitutional inequality among similarly situated citizens.

PRAYER FOR RELIEF

Plaintiff respectfully requests that the Court:

- A. Declare the challenged framework unconstitutional;
- B. Enjoin enforcement of unequal contribution limits;
- C. Grant such other relief as the Court deems just and proper.

Respectfully submitted,

Handwritten signature of Joachim William Llop in cursive script.

Joachim William Llop

Plaintiff, Pro Se

310 Glen Lake Drive

Atlanta, GA 30327

Dated: December 30, 2025