

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

JOACHIM WILLIAM LLOP, Plaintiff

v.

FEDERAL ELECTION COMMISSION, Defendant

Civil Action No. 1:26-cv-00051-TSC

### PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

#### INTRODUCTION

Plaintiff Joachim William Llop respectfully opposes Defendant's Motion to Dismiss. Defendant incorrectly characterizes Plaintiff as merely an eligible voter asserting a generalized grievance. Plaintiff is a former congressional candidate who has repeatedly sought federal office and intends to seek federal office again. Plaintiff therefore possesses standing and presents constitutional claims appropriate for judicial review.

#### FACTUAL BACKGROUND

Plaintiff was a candidate for the United States House of Representatives in Georgia's 11th Congressional District Republican Primary in 2012 and received 8,604 votes. Plaintiff was a candidate for the United States House of Representatives in Georgia's 11th Congressional District Republican Primary in 2016 and received 4,857 votes. Plaintiff was a candidate for the United States House of Representatives in Georgia's 6th Congressional District Special Election in 2017 and received 326 votes.

As a federal candidate, Plaintiff was directly subject to the campaign-finance laws and regulations administered by the Federal Election Commission. Plaintiff intends to seek election to the United States House of Representatives in 2028 in either Georgia's 6th Congressional District or Georgia's 11th Congressional District.

#### ARGUMENT

##### I. PLAINTIFF HAS STANDING

Plaintiff is not merely a voter asserting disagreement with public policy. Plaintiff personally participated in three congressional elections and intends to seek federal office again. The challenged regulatory framework directly governs Plaintiff's participation in future federal elections. Plaintiff therefore alleges a personal, concrete, and particularized injury sufficient to satisfy Article III standing requirements.

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JUN 17 2026

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

## II. THIS COURT HAS SUBJECT-MATTER JURISDICTION

Plaintiff challenges federal laws and regulations under the First and Fifth Amendments to the United States Constitution. Federal courts possess jurisdiction to adjudicate constitutional challenges to federal statutes and regulatory frameworks.

## III. PLAINTIFF STATES CLAIMS UPON WHICH RELIEF MAY BE GRANTED

Plaintiff alleges that the campaign-finance framework imposes materially different treatment on natural persons and other political funding mechanisms. Plaintiff contends that such distinctions burden direct political participation and raise constitutional concerns under the First Amendment and the equal-protection component of the Fifth Amendment. At the pleading stage, Plaintiff need only allege plausible claims, not prove them.

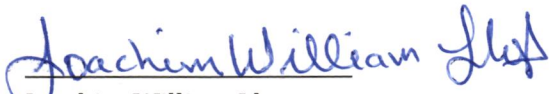
## IV. DISMISSAL IS IMPROPER

The Court's task at this stage is not to determine whether Plaintiff will ultimately prevail. Plaintiff has identified the challenged framework, the constitutional provisions at issue, his personal involvement as a federal candidate, and the relief sought. The case should proceed beyond the pleading stage.

## CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court deny Defendant's Motion to Dismiss and permit this action to proceed on the merits.

Respectfully submitted,



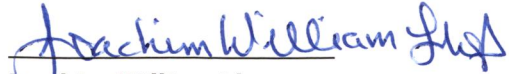
Joachim William Llop

Plaintiff, Pro Se

Date: 6/09/2026

## CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Plaintiff's Opposition to Defendant's Motion to Dismiss was served by United States Mail upon counsel for Defendant on this 10<sup>th</sup> day of June, 2026.

  
Joachim William Llop

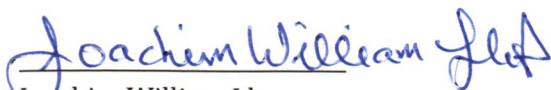
## DECLARATION OF JOACHIM WILLIAM LLOP

I, Joachim William Llop, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the Plaintiff in this action.
2. I was a candidate for the United States House of Representatives in Georgia's 11th Congressional District Republican Primary in 2012 and received 8,604 votes.
3. I was a candidate for the United States House of Representatives in Georgia's 11th Congressional District Republican Primary in 2016 and received 4,857 votes.
4. I was a candidate for the United States House of Representatives in Georgia's 6th Congressional District Special Election in 2017 and received 326 votes.
5. As a federal candidate, I was directly subject to the campaign-finance laws and regulations administered by the Federal Election Commission.
6. I intend to seek election to the United States House of Representatives in 2028 in either Georgia's 6th Congressional District or Georgia's 11th Congressional District.
7. My claims arise from my direct participation in federal elections and my continuing intention to seek federal office.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/09/2026



Joachim William Llop

Declarant