

EXHIBIT 1

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

SENATE MAJORITY PAC

Plaintiff,

v.

FEDERAL ELECTION COMMISSION

Defendant,

NRSC

Intervenor-Defendant.

Civil Action No. 1:26-cv-336 (BAH)

**NATIONAL REPUBLICAN SENATORIAL COMMITTEE’S
MOTION TO DISMISS**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), the National Republican Senatorial Committee (“NRSC”) respectfully moves this court to dismiss the claims in plaintiff’s complaint. Plaintiffs fail to state a claim upon which relief may be granted for three reasons: (1) plaintiff lacks standing; (2) the defendant did not act contrary to law; and (3) contrary-to-law review of the defendant’s inherent enforcement discretion violates Article II of the U.S. Constitution.

The grounds for this motion are set forth in the accompanying memorandum. A proposed order is attached.

Dated: April 7, 2026

Respectfully submitted,

/s/ Dennis W. Polio

Dennis W. Polio

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Erin Morrow Hawley

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Pro hac vice motion pending

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Pro hac vice motion pending

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CERTIFICATE OF SERVICE

I hereby certify that, on April 7, 2026, the foregoing Motion to Intervene was electronically served upon all counsel of record via the Court's CM/ECF system.

/s/ Dennis W. Polio
Dennis W. Polio
*Counsel for Proposed Intervenor-Defendant
NRSC*