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JUL 28 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 SEEGERs,

Plaintiff,

v.

FEDERAL ELECTION COMMISSION,

Defendant.

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

Judge Jia M. Cobb

**DECLARATION OF JULIE SEEGERs
IN SUPPORT OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Julie Seegers, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am the Plaintiff in this action and am over the age of eighteen. I make this Declaration on personal knowledge, on my review of the docket in this case, and on my review of my own files. If called to testify, I could and would competently testify to the facts set forth below.

2. I am a United States citizen, an elector, and a voter, and I reside in Burlington, Wisconsin. I rely on accurate and complete federal campaign-finance disclosures to evaluate political committees, candidates, and the true sources of political contributions.

THE ADMINISTRATIVE COMPLAINT (MUR 8404)

3. On August 29, 2025, I executed and submitted to the Federal Election Commission (“the Commission” or “the FEC”) a sworn, notarized administrative complaint pursuant to 52 U.S.C. § 30109(a)(1) and 11 C.F.R. §§ 111.4–111.7. A true and correct copy of that administrative complaint is attached as Exhibit E. The administrative complaint was also filed with the Complaint in this action as Dkt. 1-1.

4. The administrative complaint names as respondents ActBlue (FEC ID C00401224) and its treasurer, George Gilmer. It alleges that ActBlue accepted, processed, and reported large volumes of contributions through a campaign-finance laundering pattern commonly known as “smurfing” - the fragmentation of contributions into large numbers of small transactions reported in the names of individuals, including elderly and unemployed individuals, whose reported donation activity is inconsistent with genuine personal giving.

5. The administrative complaint cites violations of 52 U.S.C. § 30122 (contributions in the name of another), 52 U.S.C. § 30104 (reporting), 52 U.S.C. § 30102 (recordkeeping), and 52 U.S.C. § 30116 (contribution limits), together with the Commission's implementing regulations, including 11 C.F.R. § 110.4(b). It is supported by transaction-level analysis of the FEC's own public disclosure database, identifying as many as 178,204,660 flagged donor transactions totaling at least \$3,543,266,360, attributed to as many as 281,434 unique flagged donor identities — approximately 39.7% of the 449,329,799 committee transactions available for the analyzed period.

6. By letter dated September 26, 2025, the Commission acknowledged receipt of the administrative complaint and confirmed that the matter had been assigned Matter Under Review No. 8404. A true and correct copy of the FEC's acknowledgment letter is attached as Exhibit D.

7. The 120-day statutory period under 52 U.S.C. § 30109(a)(8)(A) began on August 29, 2025, the date the administrative complaint was filed, and expired on December 27, 2025.

8. As of the date of this Declaration, I have received no further communication from the Commission concerning MUR 8404 indicating any disposition. The Commission has not, to my knowledge after diligent inquiry, (a) made a “reason to believe” finding under § 30109(a)(2), (b) dismissed MUR 8404, (c) entered into conciliation under § 30109(a)(4)(A), or (d) instituted civil proceedings under § 30109(a)(6). The Commission's public records and its filings in this Court

reflect no disposition of MUR 8404. The publicly available description of the Commission's preliminary procedures, dated January 2023, is attached as Exhibit H.

PROCEDURAL HISTORY OF THIS CIVIL ACTION

9. I commenced this action on January 30, 2026 by filing the Complaint for Declaratory and Injunctive Relief (Dkt. 1) in this Court, within 60 days after the expiration of the 120-day statutory period. A true and correct copy of the current docket sheet for Civil Action No. 1:26-cv-00276-JMC is attached as Exhibit B and is incorporated herein. I have reviewed Exhibit B and have personal knowledge that no answer, Rule 12 motion, or extension of time has been filed by the Commission and that no entry of any such filing appears on the docket.

10. 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, together with Exhibit 1 and attachments, by delivering them to Aquilla Alexander, Paralegal Specialist, authorized to accept service. See Fed. R. Civ. P. 4(i)(1)(A)(i). The process server's sworn Declaration of Service was filed on March 4, 2026 (Dkt. 6, p. 1). A true and correct copy appears in Exhibit C.

11. 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, with the court-stamped Summons and Complaint, together with Exhibit 1 and attachments, by delivering them to Joe Clark, Facilities Manager, authorized to accept service on behalf of the Commission. See Fed. R. Civ. P. 4(i)(2). The process server's sworn Declaration of Service was filed on March 4, 2026 (Dkt. 6, p. 2). A true and correct copy appears in Exhibit C.

12. 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 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. See Fed. R. Civ. P. 4(i)(1)(B). 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). A true and correct copy appears in Exhibit C. All service was completed within the 90-day period prescribed by Rule 4(m).

13. On April 24, 2026, the Commission filed its Notice of Lack of Quorum (Dkt. 8), signed by counsel Lisa J. Stevenson (Deputy General Counsel - Law; D.C. Bar No. 457628), James D. McGinley (Associate General Counsel; D.C. Bar No. 1017356), Shaina Ward (Acting Assistant General Counsel; D.C. Bar No. 1002801), and Greg J. Mueller (Attorney; D.C. Bar No. 462840). A true and correct copy is attached as Exhibit F. The Notice represents that, since the resignations of former Commissioners Allen Dickerson (April 30, 2025) and James E. "Trey" Trainor (October 3, 2025), the Commission has lacked the four affirmative votes required by 52 U.S.C. § 30106(c) and § 30107(a)(6) to authorize the defense of this action, and that the nominations of two new Commissioners announced on February 11, 2026 remained pending as of April 24, 2026. The Notice does not admit or deny any allegation, asserts no defense, requests no relief, and seeks no extension of time; its sole stated purpose is advisory. (Dkt. 8 ¶ 4.)

14. Under Federal Rule of Civil Procedure 12(a)(2), the Commission's answer or Rule 12 motion was due 60 days after service on the United States Attorney - Saturday, April 25, 2026, extended to Monday, April 27, 2026 by Rule 6(a)(1)(C). That deadline has lapsed. The

Commission has not filed an answer, has not filed a Rule 12 motion, and has neither requested nor obtained an enlargement of time to respond.

15. By Minute Order of May 7, 2026, the Court invited my position on whether this action should be stayed pending restoration of a quorum at the Commission. On May 20, 2026, I filed my Response to Defendant's Notice of Lack of Quorum and Opposition to Any Stay (Dkt. 10). A true and correct copy is attached as Exhibit G.

16. I filed my Declaration in Support of Request for Clerk's Entry of Default on May 18, 2026 (Dkt. 9); my Request for Clerk's Entry of Default, supporting Affidavit, and proposed entry on May 20, 2026 (Dkt. 11); and a letter to the Clerk of Court requesting action on my request on June 15, 2026 (Dkt. 12).

17. On July 8, 2026, the Clerk of Court entered default against the Federal Election Commission under Federal Rule of Civil Procedure 55(a) (Dkt. 13), reciting that the Commission failed to plead or otherwise defend this action though duly served with summons and a copy of the complaint on February 24, 2026. A true and correct copy of the Clerk's Entry of Default is attached as Exhibit A.

18. I have not been informed, and have no information indicating, that the defendant is an infant, an incompetent person, or in the military service. I am informed and believe that, as the defendant is a federal agency, the Servicemembers Civil Relief Act, 50 U.S.C. §§ 3901–4043, does not apply.

EXHIBITS AUTHENTICATED BY THIS DECLARATION

The exhibits attached to and authenticated by this Declaration are as follows:

Exhibit A: Clerk's Entry of Default (Dkt. 13, entered July 8, 2026).

Exhibit B: Current docket sheet for Civil Action No. 1:26-cv-00276-JMC.

Exhibit C: Proof of service under Federal Rule of Civil Procedure 4(i), comprising (i) the process server's Declaration of Service on the United States Attorney for the District of Columbia (Dkt. 6, p. 1), filed March 4, 2026; (ii) the process server's Declaration of Service on the Federal Election Commission (Dkt. 6, p. 2), filed March 4, 2026; and (iii) the process server's Affidavit of Service by Certified Mail on the Attorney General of the United States, with USPS proof of delivery (Dkt. 7), filed April 15, 2026.

Exhibit D: FEC Acknowledgment Letter for MUR 8404, dated September 26, 2025.

Exhibit E: Plaintiff's sworn, notarized administrative complaint (MUR 8404), executed and filed August 29, 2025 (Dkt. 1-1).

Exhibit F: Defendant's Notice of Lack of Quorum (Dkt. 8), filed April 24, 2026.

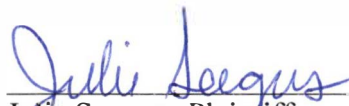
Exhibit G: Plaintiff's Response to Defendant's Notice of Lack of Quorum and Opposition to Any Stay (Dkt. 10), filed May 20, 2026.

Exhibit H: Federal Election Commission, "Description of Preliminary Procedures for Processing Complaints Filed with the Federal Election Commission" (January 2023).

I 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.

Executed on July 20, 2026, at Burlington, Wisconsin.

Respectfully submitted,



Julie Seegers, Plaintiff
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