

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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LIBERTARIAN NATIONAL)	
COMMITTEE, INC.,)	Case No. 1:16-CV-0121-BAH
)	
Plaintiff,)	
)	
v.)	
)	
FEDERAL ELECTION COMMISSION,)	
)	
Defendant.)	
-----)	

PLAINTIFF’S MOTION TO CERTIFY FACTS AND QUESTIONS

Pursuant to 52 U.S.C. § 30110, Plaintiff Libertarian National Committee, Inc. (“LNC”) respectfully moves this Court to adopt the proposed findings of fact and certify the following questions to the Court of Appeals for the District of Columbia Circuit:

1. Does imposing annual contribution limits against the bequest of Joseph Shaber violate the First Amendment rights of the Libertarian National Committee?
2. Do 52 U.S.C. §§ 30116(a)(1)(B) and 30125, on their face, violate the First Amendment rights of the Libertarian National Committee by restricting the purposes for which the Committee may spend its money?
3. Does restricting the purposes for which the Libertarian National Committee may spend the bequest of Joseph Shaber violate the Committee’s First Amendment rights?

This motion is based upon the attached memorandum of points and authorities in support of the motion, attached declarations and exhibits, the Court’s file, matters of which the Court may take judicial notice, and any argument the Court may wish to schedule.

Plaintiff reserves the right to submit additional proposed facts as may be warranted in response to any response to this motion, including proposed facts, by the Defendant.

Plaintiff respectfully requests that the motion be granted.

Dated: September 5, 2017

Respectfully submitted,

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By: /s/ Alan Gura _____

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