UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

DEMOCRATIC NATIONAL COMMITTEE,

DSCC,

and

DCCC,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States,

PAMELA BONDI, in her official capacity as U.S. Attorney General,

FEDERAL ELECTION COMMISSION,

And

JAMES E. TRAINOR III, SHANA M. BROUSSARD, ALLEN DICKERSON, and DARA LINDENBAUM, in their official capacities as Commissioners of the Federal Election Commission,

Defendants

Civil Action No. 25-587 (AHA)

MOTION TO DISMISS THE COMPLAINT

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Defendants Donald J. Trump and Pamela Bondi respectfully file this Motion to Dismiss the Complaint. The Court should dismiss the entire Complaint for lack of subject-matter jurisdiction and should dismiss Count II of the Complaint for failure to state a claim. The grounds for this motion are fully explained in the accompanying memorandum of law.

Dated: March 14, 2025 Respectfully Submitted,

YAAKOV M. ROTH Acting Assistant Attorney General Civil Division

CHRISTOPHER R. HALL Assistant Director, Federal Programs Branch

/s/ Jeremy S.B. Newman
JEREMY S.B. NEWMAN
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, DC 20005
Tel: (202) 532-3114
Fax: (202) 616-8470

Email: jeremy.s.newman@usdoj.gov

Attorneys for Defendants Donald J. Trump and Pamela Bondi