

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

| | | |
|---|---|----------------------------------|
| _____ |) | |
| LAKE TRAVIS CITIZENS COUNCIL, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | Civil Case No. 1:14-cv-00994- LY |
| NATALIA ASHLEY, in her official capacity |) | |
| as Executive Director of the Texas Ethics |) | |
| Commission, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

MOTION FOR DECLARATORY JUDGMENT AND PERMANENT AND PRELIMINARY INJUNCTIONS

Plaintiff Lake Travis Citizens Council, pursuant to 28 U.S.C. §§ 2201-02, 42 U.S.C. § 1983, 42 U.S.C. § 1988, and Fed. R. Civ. P. 65, respectfully requests declaratory judgment and permanent and preliminary injunctions barring the enforcement of Sections 251.001(7) (defining “campaign expenditure”) and 251.001(12) (defining “political committee”) of the Texas Election Code and Texas Ethics Commission Rule § 20.1(20) (defining “principal purpose”). A Memorandum in Support of Plaintiff’s Motion and a Proposed Order are filed concurrently with this Motion.

Dated: November 6, 2015

Respectfully submitted,

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