

- (2001); *McConnell v. FEC*, 540 U.S. 93 (2003)), 19-21 (discussing potential for massive aggregate contributions), 28-29 (discussing contributions to non-party political committees), 30-33 (discussing contributions to candidates).)
- The aggregate limit furthers the government's anti-corruption interest by limiting contributors' ability to use contributions to national political parties to exert actual or apparently corrupt influence over federal officeholders. (FEC Inj. Br. at 23-26 (discussing *Colorado Republican*, *McConnell*, and *Republican Nat'l Comm. v. FEC*, 698 F. Supp. 2d 150 (D.D.C. 2010) (three-judge court), *aff'd mem.*, 130 S. Ct. 3544 (2010)).)

For the foregoing reasons and all the others discussed in the Commission's prior memorandum, the Commission requests that the Court dismiss this action with prejudice after the consolidated motion hearing currently scheduled for September 6, 2012.

Respectfully submitted,

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