

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CITIZENS FOR RESPONSIBILITY AND
ETHICS IN WASHINGTON,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*

Defendants.

Case No. 22-cv-3350-TSC

DEFENDANTS' MOTION TO DISMISS

Defendants, by and through their undersigned counsel, hereby move for dismissal of the Complaint pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure. In support of this motion, Defendants submit the accompanying Memorandum of Points and Authorities with supporting declarations and proposed Order.

Dated: March 2, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Director, Federal Programs Branch

/s/ Cormac A. Early
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