

Press Coverage | September 30, 2026

11th Circ. Seems Wary of Ga. Campaign Finance Challenge

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[David B. Dove](#)

[David Dove](#), a partner in Troutman Pepper Locke's [Regulatory Investigations, Strategy + Enforcement](#) Practice Group, was quoted in the September 30, 2026, *Law360* article, "[11th Circ. Seems Wary of Ga. Campaign Finance Challenge](#)."

Attorney David B. Dove, representing Georgia Attorney General Chris Carr and Georgia State Ethics Commission Chair James Kreyenbuhl, said that the panel was right to question the lack of specificity in the complaint.

U.S. District Judge Mark Cohen was right to dismiss the lawsuit in July 2025, Dove argued, because all that was alleged was a "hypothetical" future injury.

"There is no allegation in the complaint as it relates to any party officer who may have had an issue recruiting a candidate," Dove said. "There is no potential candidate who is alleged to have not run by virtue of the leadership committee statute, and there is also no empirical evidence that looks at the ability of the parties to not recruit candidates as they have in the past since the passage of this statute."

Dove also argued that the political bodies failed to allege any diversion of resources or "any other specific type of injury that is occurring to the parties." Without those elements, he said there is no standing for the organization.

Associational standing also cannot be established for the claims made about members' alleged harm, Dove said, because there was no allegation in the complaint "even one specific member" was harmed by the statute.

"Here, you don't have a candidate, you don't have an injury, and you don't have an election," Dove said. "You just have this broad claim that this is going to impact these future categories of individuals, and that's important to note. The idea that there might be nominees is not a pseudonym for an individual who exists today."

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Carr and Kreyenbuhl are represented by David B. Dove and Elizabeth P. Waldbeser of Troutman Pepper Locke LLP.

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