

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:23cv763
)	
CHAMELEON LLC and GARY V.)	
LAYNE,)	
)	
Defendants.)	
)	

**DEFENDANTS’ MOTION TO DISMISS FOR LACK OF SUBJECT MATTER
JURISDICTION AND FAILURE TO STATE A CLAIM**

Chameleon LLC and Gary V. Layne (collectively “Defendants”) move to dismiss the United States of America’s (“Government”) Amended Complaint for lack of subject matter jurisdiction under Federal Rule of Civil Procedure 12(b)(1) and for failure to state a cognizable claim under Federal Rule of Civil Procedure 12(b)(6).

For the reasons more fully stated in Defendants’ Memorandum in Support of Their Motion to Dismiss, which is incorporated herein, Defendants request that the Court dismiss the Government’s Amended Complaint with prejudice.

Dated: January 2, 2025

Respectfully submitted,

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Counsel for Chameleon LLC and Gary V. Layne

CERTIFICATE OF SERVICE

I certify that on January 2, 2025, I filed the forgoing electronically, which sent a notice of electronic filing to all counsel of record in this matter.

/s/ Frank Talbott V