



MISSISSIPPI'S SPEAKER OF THE HOUSE

April 26, 2019

Federal Election Commission  
Office of Complaints Examination  
& Legal Administration  
Attn: Kathryn Ross, Paralegal  
1050 First Street, NE  
Washington, DC 20463

2019 MAY -7 PM 12: 32

OFFICE OF  
GENERAL COUNSEL

Re: Philip Gunn Campaign  
MUR 7594

Dear Ms. Ross:

We are corresponding to your office in response to an April 18, 2019 letter from Mr. Jeff S. Jordan (see attached) regarding a complaint filed with the Federal Election Commission (FEC) related to the above captioned campaign.

We agree that the campaign did receive a \$1,500 contribution from Enbridge (U.S.) Inc. PAC (copy of check enclosed). Please note the check reflects FEC ID # C00429662 and states that "this PAC is registered as a Multi-Candidate Committee (see attached printout from the FEC website denoting registration from the FEC). We have also attached a letter from The Enbridge/DCP PAC confirming their status as being registered with the FEC as a PAC and confirming that the contribution made to this campaign was in fact in compliance with FEC rules.

If the FEC determines that the registration of this PAC by the FEC is incorrect, and the PAC is a foreign entity, then the campaign stands ready to return the funds to the donor. We await your guidance as to the resolution of this matter.

Please let us know as soon as possible as to your determination. We appreciate your consideration of the information provided in this letter.

Sincerely,

Anthony L. Huffman, CPA  
Campaign Finance Director



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

APR 18 2019

Phillip Gunn Election Campaign  
Capitol Room 306  
P.O. Box 1018  
Jackson, MS 39215

RE: MUR 7594

Dear Sir/Madam:

The Federal Election Commission received a complaint that indicates Phillip Gunn Election Campaign may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 7594. Please refer to this number in all future correspondence.

The Act affords you the opportunity to demonstrate in writing that no action should be taken against Phillip Gunn Election Campaign in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.<sup>1</sup>

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission. Please note that you have a legal obligation to preserve all documents, records, and materials relating to the subject matter of the complaint until such time as you are notified that the Commission has closed its file in this matter. See 18 U.S.C. § 1519.

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<sup>1</sup> The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

Any correspondence sent to the Commission, such as a response, must be addressed to **one** of the following (note, if submitting via email this Office will provide an electronic receipt by email):

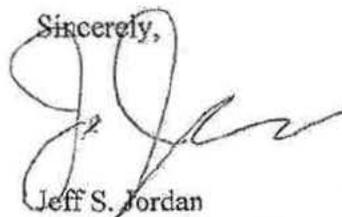
**Mail**  
Federal Election Commission  
Office of Complaints Examination  
& Legal Administration  
Attn: Kathryn Ross, Paralegal  
1050 First Street, NE  
Washington, DC 20463

OR

**Email**  
cela@fec.gov

If you have any questions, please contact Kathryn Ross at (202) 694-1539 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff S. Jordan', written over the word 'Sincerely,'.

Jeff S. Jordan  
Assistant General Counsel  
Complaints Examination &  
Legal Administration

Enbridge (U.S.) Inc. PAC (Enbridge-DCP PAC)  
5400 WESTHEIMER COURT  
HOUSTON, TX 77056  
FEC ID C00429662

COMERICA BANK  
09-009/720

Date: 09/20/2018

THIS PAC IS REGISTERED AS A MULTI-CANDIDATE CMTE.

Philip Gunn Election Campaign

1,500.00

PAY TO THE  
ORDER OF

One thousand five hundred and xx / 100 \*\*\*\*\*

\$

DOLLARS

2019 Primary

Void in 90 Days

*Ritu Talwar*

MEMO

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Home > Campaign finance data > Committee profiles

> ENBRIDGE (U.S.) INC. POLITICAL ACTION COMMITTEE (ENBRIDGE-DCP PAC)

# ENBRIDGE (U.S.) INC. POLITICAL ACTION COMMITTEE (ENBRIDGE-DCP PAC)



PAC - QUALIFIED - LOBBYIST/REGISTRANT PAC

ID: C00429662

## Financial summary

TWO-YEAR PERIOD

2019-2020



Enbridge DCP PAC  
5400 Westheimer Court  
Houston, Texas 77056

April 26, 2019

Nathan Wells  
House Speaker Phillip Gunn's office  
Jackson, Ms

Re: Complaint filed with the Federal Election Commission by Alexander Austin with respect to Enbridge-DCP PAC – MUR 7594

To whom it may concern:

As you may be aware, Alexander Austin, an individual residing in Colorado, has submitted a complaint to the Federal Election Commission (FEC) with respect to Enbridge (U.S.) Inc. Political Action Committee (Enbridge-DCP PAC) (which was formerly known as Spectra Energy Corp Political Action Committee (Spectra-DCP PAC)).

The complaint is focused on the fact that Enbridge (U.S.) Inc., which sponsors Enbridge-DCP PAC, is a subsidiary of Enbridge Inc., a Canadian company.

Enbridge Inc. is a Canadian corporation with its common shares publically traded on the Toronto and New York stock exchanges under the symbol "ENB." Enbridge Inc. is one of North America's largest energy infrastructure companies with strategic business platforms (owned and operated through its subsidiaries) that include an extensive network of crude oil, liquids and natural gas pipelines, regulated natural gas distribution utilities and renewable power generation assets. Enbridge (U.S.) Inc. is a Delaware corporation and a wholly owned subsidiary of Enbridge Inc. Enbridge (U.S.) Inc.'s principal place of business is located in Houston, Texas, and, through its subsidiaries, has approximately 3,500 employees in the U.S., who safely maintain and operate Enbridge's assets across 41 U.S. states.

Please be assured that the operations of the Enbridge-DCP PAC are in full compliance with federal law and regulations, which allow the U.S. subsidiaries of foreign companies to sponsor PACs, have such PACs solicit contributions from eligible U.S. citizens and green card holders, and have such PACs make contributions to U.S. political committees. Many U.S. subsidiaries of foreign companies sponsor PACs and engage in such activities. The law is clear in this area, and we are confident the complaint will be dismissed.

Unfortunately, the complaint identified not only the Enbridge-DCP PAC but also many of the federal and state political committees to which the Enbridge-DCP PAC made contributions to over several years. This included your committee, and the FEC was therefore obligated to notify your committee of the complaint. You likely received a letter from Jeff Jordan, the FEC's Assistant General Counsel, in recent days.

As the letter explains, at this preliminary stage the FEC is given an opportunity to determine if there is any reason to believe that a possible violation has occurred. Only if the FEC reach that conclusion would the FEC open an investigation into the matter.

April 29, 2019  
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Enbridge (U.S.) Inc. will respond to the complaint on our behalf and seek to demonstrate that there is no reason for the FEC to believe that any violation has occurred. Other parties mentioned in the complaint, including your committee, are provided a chance to respond at this preliminary stage too, but a response is not required. If your committee chooses to respond, as the letter explains, your committee may request an extension of the 15-day response deadline referenced in the letter.

If you have any questions about this matter, please feel free to contact Adam Parker at 202-347-3386 or [adam.parker1@enbridge.com](mailto:adam.parker1@enbridge.com).

Sincerely,

A handwritten signature in black ink that reads "Adam C. Parker". The signature is written in a cursive style with a large initial "A" and "P".

Adam Parker  
Enbridge-DCP PAC Manager