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by Kathryn Ross  
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John B. Heatly  
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Greg A. Castro  
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Bryan N.B. King

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Susannah M. Barclay  
Chelsea Celsor Smith  
John K. Williams

May 1, 2019

Federal Election Commission  
Office of Complaints Examination  
& Legal Administration  
Attn: Kathryn Ross, Paraegal  
Via email: [cela@fec.gov](mailto:cela@fec.gov)

**RE: MUR 7594 – Response by Mark McBride for State House 53-2018**

Dear Federal Election Commission:

I represent Mark McBride for State House 53-2018, a candidate committee registered in the State of Oklahoma, that received a complaint alleging violations of federal campaign finance laws. The complaint alleges the committee accepted a contribution from a foreign national in violation of 52 USC § 30121(a)(2), which prohibits any person to solicit, accept, or receive a contribution in connection with a Federal, State, or local election from a foreign national. Mark McBride for State House 53-2018 denies the allegation that it accepted a contribution from a foreign national. In support of this, the committee submits the following:

1. The alleged foreign national in this complaint is Enbridge (U.S.) Inc. Political Action Committee (Enbridge-DCP PAC)(FEC Committee ID # C00429662).
2. Enbridge (U.S.) Inc. PAC is a United States political action committee registered with the Federal Election Commission with an address located in Houston, Texas.
3. Enbridge (U.S.) Inc. PAC is registered as an affiliated committee of Enbridge (U.S.) Inc., a domesticated United States corporation with a headquarters in Houston, Texas.
4. Enbridge (U.S.) Inc. PAC appears to only accept contributions from individuals who are legally permitted to contribute to the PAC.
5. Enbridge (U.S.) Inc. PAC made a contribution to Mark McBride for State House 53-2018, which is permitted by federal and Oklahoma campaign finance laws.
6. Enbridge (U.S.) Inc. PAC and its affiliated entity, Enbridge (U.S.) Inc., are not foreign nationals making the foreign national prohibition in 52 USC § 30121 irrelevant.

In conclusion, Mark McBride for State House 53-2018 received a contribution from a United States PAC registered with the Federal Election Commission. The PAC is affiliated with a United States corporation and only accepts contributions from legally permissible contributors. Mark McBride for State House 53-2018 is not in violation of 52 USC § 30121 and respectfully requests the Federal Election Commission dismiss the complaint.

Respectfully submitted,

A handwritten signature in cursive script that reads "Chelsea Celsor Smith".

Chelsea Celsor Smith

#56580/755465



FEDERAL ELECTION COMMISSION  
1050 First Street, NE  
Washington, DC 20463

**STATEMENT OF DESIGNATION OF COUNSEL**

*Provide one form for each Respondent/Witness*

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7594

Name of Counsel: Chelsea Smith

Firm: Fellers Snider

Address: 100 N. Broadway, Suite 1700  
Oklahoma City, OK 73102

Office#: \_\_\_\_\_ Fax#: \_\_\_\_\_

Mobile#: \_\_\_\_\_

E-mail: Csmith@fellersnider.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5-1-19 \_\_\_\_\_  
Date (Signature - Respondent/Agent/Treasurer) Title  
J. Mark McBride  
J. Mark McBride  
(Name - Please Print)

**RESPONDENT:** Mark McBride for State House 53-2018  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 100 N. Broadway, Suite 1700  
(Please Print) Oklahoma City, OK 73102

Home#: \_\_\_\_\_ Mobile#: \_\_\_\_\_

Office#: \_\_\_\_\_ Fax#: \_\_\_\_\_

E-mail: mark.mcbride@okhouse.gov

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.