



THE LAW OFFICE OF  
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May 2, 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 Friends of John Michael Montgomery 2018**

Dear Federal Election Commission:

Friends of John Michael Montgomery 2018, a candidate committee registered in the State of Oklahoma, received the complaint alleging violations of federal campaign finance laws. Specifically, 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. Friends of John Michael Montgomery 2018 denies the allegation that it accepted a contribution from a foreign national. In support of this, the committee submits the following information:

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 headquartered 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, and there is no indication that Enbridge (U.S.) Inc. PAC is controlled or directed, directly or indirectly, by any foreign national.
5. Enbridge (U.S.) Inc. PAC made a contribution to Friends of John Michael Montgomery 2018, which is permitted by both federal and Oklahoma campaign finance laws.

6. Enbridge (U.S.) Inc. PAC, its contributors, and its affiliated entity, Enbridge (U.S.) Inc., are not foreign nationals, so the foreign national prohibition in 52 USC § 30121 is not implicated in the contributions at issue here.

## Summary

The facts show that Friends of John Michael Montgomery 2018 received a contribution from a United States political action committee registered with the Federal Election Commission. The PAC is affiliated with a United States corporation and only accepts contributions from legally permissible contributors. Friends of John Michael Montgomery 2018 is not in violation of 52 USC § 30121 as alleged in the complaint. Friends of John Michael Montgomery 2018 respectfully requests the Federal Election Commission dismiss it from the complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Geoffrey Long', written in a cursive style.

Geoffrey Long  
*Attorney for Friends of  
John Michael Montgomery 2018*



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

**STATEMENT OF DESIGNATION OF COUNSEL**

Provide one form for each Respondent/Witness

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AR/MUR/RR/P-MUR# 7594

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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.

		Candidate/Respondent
Date	(Signature - Respondent/Agent/Treasurer)	Title
	John Michael Montgomery	
	(Name - Please Print)	

**RESPONDENT:** Friends of John Michael Montgomery 2018  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 413 NW 69th Street  
(Please Print)

Lawton, OK 73505

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

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

E-mail: \_\_\_\_\_

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.