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May 6, 2019

Amanda Bevis  
Adam Putnam for Governor  
P.O. Box 547  
Bartow, Florida 33831

Federal Election Commission  
Office of Complaints Examination & Legal Administration  
Attention: Kathryn Ross, Paralegal  
1050 First Street, NE  
Washington, D.C. 20463  
Via E-mail: [cela@fec.gov](mailto:cela@fec.gov)

Reference: MUR 7594

To Whom It May Concern:

The Adam Putnam for Governor campaign, which closed in 2018, received a notice from the Federal Election Commission regarding a complaint filed by Alexander Austin with respect to Enbridge (U.S.) Inc. Political Action Committee (Enbridge-DCP PAC).

No action should be taken against the Adam Putnam for Governor campaign in this matter. Enclosed please find a letter from Enbridge-DCP PAC, which demonstrates as much.

If you have further questions or concerns regarding the Adam Putnam for Governor campaign, please reach out to me:

Amanda Bevis  
Adam Putnam for Governor  
1017 Thomasville Road, Suite A  
Tallahassee, Florida 32303  
[amanda@redhillsstrategies.com](mailto:amanda@redhillsstrategies.com)  
(202) 680-9262 Cell

Thank you for the notification and the opportunity to respond.

Sincerely,



Amanda Bevis  
Adam Putnam for Governor

Enc: Letter from Enbridge-DC PAC

May 6, 2019

The Honorable Adam Putnam  
Adam Putnam for Governor  
P.O. Box 547  
Bartow, FL 33831

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.

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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,



Adam Parker  
Enbridge-DCP PAC Manager