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by Kathryn Ross  
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# BakerHostetler

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May 8, 2019

## VIA E-MAIL

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

*Re: MUR #7594, Alexander Austin v. Republican State Leadership Committee, et al.:*  
Response of Republican State Leadership Committee

Dear Ms. Ross:

We represent the Republican State Leadership Committee<sup>1</sup> (“RSLC”) in the above-referenced matter. Alexander Austin (“Austin”) complains that the RSLC—along with hundreds of federal candidate committees, national political committees, state candidate committees, state political committees, and state caucus committees, both Democrat and Republican—accepted illegal contributions from a foreign corporation. This Complaint is frivolous and should be dismissed.

The RSLC is a political organization organized under Section 527 of the Internal Revenue Code, and it is not required to register with the Federal Election Commission. The

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<sup>1</sup> We do not represent the Republican Legislative Delegation Campaign Committee, which appears to be a Louisiana Organization with an address at P.O. Box 44422, Baton Rouge, LA 70804. See 2018 April Monthly, FEC Form 3X at 83, filed April 19, 2018. This entity is not related, affiliated, or otherwise connected to the RSLC.

**VIA E-MAIL**

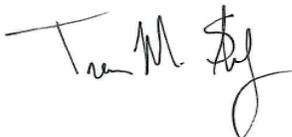
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RSLC does not accept foreign contributions. In addition, the RSLC is not subject to the source and limit restrictions contained in the Federal Election Campaign Act of 1971 (the "Act"). Consequently, the RSLC is able to accept unlimited corporate contributions, and it publicly discloses those contributions on Form 8872 filed with the Internal Revenue Service.

RSLC did not accept a foreign, corporate contribution as Mr. Austin alleges. Instead, it accepted one contribution of \$15,000 from Enbridge (U.S.) Inc. PAC (Enbridge-DCP PAC), a separate segregated fund qualified as a multicandidate committee with the Commission. *See* Exhibit A, copy of contribution to RSLC. This PAC is not a foreign corporation. Instead, it is separate segregated fund of a connected U.S. based organization, Enbridge (U.S.) Inc., located at 5400 Westheimer Court, Houston Texas, 77056. *See* Exhibit B, Statement of Organization. There is no federal, state, or local law or regulation prohibiting a separate segregated fund that is registered with the Commission, and has qualified as a multicandidate committee, from making a contribution, in any amount, to the RSLC. Consequently, there is no basis to pursue this complaint.

For the foregoing reasons, this Complaint should be dismissed.

Sincerely,

A handwritten signature in black ink, appearing to read "Trevor M. Stanley". The signature is written in a cursive style with a large, stylized "S" at the end.

Trevor M. Stanley

# EXHIBIT A

CASH ONLY IF ALL CheckLock™ SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

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

COMERICA BANK  
09-009/720

4329

THIS PAC IS REGISTERED AS A MULTI-CANDIDATE CMTE.

Date: 09/20/2018

Republican State Leadership Committee RSLC

PAY TO THE  
ORDER OF

\$ 15,000.00

Fifteen thousand and xx / 100 \*\*\*\*\*

DOLLARS

MEMO  
2018 Nonfederal Contribution

Void in 90 Days

*Ritu Talwar*

Enbridge (U.S.) Inc. PAC (Enbridge-DCP PAC)

4329

Date: 09/20/2018

Amount: \$15,000.00

Pay To: Republican State Leadership Committee RSLC

Memo: 2018 Nonfederal Contribution

Stub Note: Republican State Leadership Committee RSLC

*RLLC MEM 18*

152011 INTUIT INC # 7185 / 80043315610

Details on Back Intuit® CheckLock™ Secure Check

# EXHIBIT B

# FEC FORM 1

# STATEMENT OF ORGANIZATION

Office Use Only

1. NAME OF COMMITTEE (in full)  (Check if name is changed) Example: If typing, type over the lines.

12FE4M5

Enbridge (U.S.) Inc. Political Action Committee (Enbridge-DCP PAC)

ADDRESS (number and street)

5400 Westheimer Court

(Check if address is changed)

Houston

CITY ▲

TX

STATE ▲

77056

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

(Check if address is changed)

pacservices@ddcadvocacy.com

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address is changed)

2. DATE

02 / 27 / 2017

3. FEC IDENTIFICATION NUMBER ►

C C00429662

4. IS THIS STATEMENT

NEW (N)

OR

AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Talwar, Ritu, K, ,

Signature of Treasurer

Talwar, Ritu, K, ,

[Electronically Filed]

Date

03 / 06 / 2017

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office Use Only

For further information contact: Federal Election Commission Toll Free 800-424-9530 Local 202-694-1100

FEC FORM 1 (Revised 06/2012)

5. TYPE OF COMMITTEE

**Candidate Committee:**

- (a)  This committee is a principal campaign committee. (Complete the candidate information below.)
- (b)  This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate \_\_\_\_\_

Candidate Party Affiliation  Office Sought:  House  Senate  President State   
 District

- (c)  This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate \_\_\_\_\_

**Party Committee:**

- (d)  This committee is a  (National, State or subordinate) committee of the  (Democratic, Republican, etc.) Party.

**Political Action Committee (PAC):**

- (e)  This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
  - Corporation  Corporation w/o Capital Stock  Labor Organization
  - Membership Organization  Trade Association  Cooperative
  - In addition, this committee is a Lobbyist/Registrant PAC.
- (f)  This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
  - In addition, this committee is a Lobbyist/Registrant PAC.
  - In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

**Joint Fundraising Representative:**

- (g)  This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h)  This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. \_\_\_\_\_ FEC ID number  C \_\_\_\_\_
2. \_\_\_\_\_ FEC ID number  C \_\_\_\_\_
3. \_\_\_\_\_ FEC ID number  C \_\_\_\_\_
4. \_\_\_\_\_ FEC ID number  C \_\_\_\_\_

Write or Type Committee Name

# Enbridge (U.S.) Inc. Political Action Committee (Enbridge-DCP PAC)

**6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor**

Enbridge (U.S.) Inc.

Mailing Address 5400 Westheimer Court

Houston TX 77056

CITY STATE ZIP CODE

Relationship:  Connected Organization  Affiliated Committee  Joint Fundraising Representative  Leadership PAC Sponsor

**7. Custodian of Records:** Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name Talwar, Ritu, K, ,

Mailing Address 5400 Westheimer Court

Houston TX 77056

CITY STATE ZIP CODE

Title or Position

Treasurer Telephone number 713 - 989 - 1784

**8. Treasurer:** List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer Talwar, Ritu, K, ,

Mailing Address 5400 Westheimer Court

Houston TX 77056-5353

CITY STATE ZIP CODE

Title or Position

Treasurer Telephone number 713 - 989 - 1784

Full Name of Designated Agent

Nguyen, Rita, , ,

Mailing Address

5400 Westerheimer Court

Houston

TX

77056

CITY

STATE

ZIP CODE

Title or Position

Assistant Treasurer

Telephone number

713

989

8446

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Comerica Bank

Mailing Address

P.O Box 75000

Detroit

MI

48275

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE