



P.O. Box 1254 • Springfield, VA 22151 • www.DickSaslaw.com

May 13, 2019

MUR 7594

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

RECEIVED  
GENERAL COUNSEL  
MAY 13 2019 10:29 AM

Dear Ms. Ross:

In reply to a letter from Jeff Jordan, Assistant General Counsel, concerning a \$500 contribution I received from Enbridge DCP PAC, in 2018, Enclosure 1 is a copy of the reply I provided by email message. The email was timely provided within the 15-day time limit for comments referenced in your letter. In my email message, I stated that the funds I received were from their PAC with an FEC ID # and a Houston address. There was no indication that I had received an illegal foreign contribution.

I request an extension of time on your 15-day limit on responses, for consideration of additional material I was able to obtain from the Enbridge DCP-PAC, the letter at Enclosure 2. In their letter, Enbridge vigorously defends the legality of their political contributions. Enbridge states in their letter that there is no reason for the FEC to believe that a violation has occurred.

Please include both my email message and the Enbridge letter as components of my complete reply to your letter from Jeff Jordan. As noted before, I can be reached by telephone at

Sincerely,

Richard L. Saslaw

2 Enclosures

4/30/2019

Gmail - Fwd: Enbridge Contribution (picture)MUR 7594

**SASLAW REPLY**

Bruce Neilson

**Fwd: Enbridge Contribution (picture)MUR 7594**

1 message

**To FEC ltr**

Tue, Apr 30, 2019 at 2:25 PM

For your records

-----Original Message-----

From: Richard Saslaw

To: cela &lt;cela@fec.gov&gt;

Cc: '

Sent: Tue, Apr 30, 2019 1:58 pm

Subject: Fwd: Enbridge Contribution (picture)MUR 7594

Ms. Ross

I received a letter from the FEC saying I received an illegal contribution from a foreign company, the Enbridge Co. From Canada. I have enclosed a picture of their contribution and as you can see, it came from Houston, Texas and has an FEC number. The letter from the FEC was signed by Jeff Jordan.

Please don't hesitate to call me at

You also have my e-mail.

Thanks.

Richard Saslaw

35th Senate District

Virginia

Sent from my iPhone

Begin forwarded message:

**From:** Bruce Neilson**Date:** April 30, 2019 at 12:45:37 PM EDT**To:** Dick Saslaw**Subject:** Enbridge Contribution (picture)**Reply-To:** Bruce Neilson

Dick

The company is the US branch, headquartered in Houston, not Canada. I will be happy to compose a letter in reply to FEC if you want.

Regards

Bruce

ENBRIDGE contribution 2018 01 09.pdf

506K

Enclosure 1

Enbridge | DCP  
Political Action Committee

Enbridge DCP PAC  
9400 Westheimer Court  
Houston, Texas 77036

May 3, 2019

Saslaw for State Senate  
P.O. Box 1254  
Springfield, VA 22151

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.

Enclosure 2.

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".

Adam Parker  
Enbridge-DCP PAC Manager