

**SANDLER REIFF**SANDLER REIFF LAMB  
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T: 202-479-1111  
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by Kathryn Ross  
Date: 2019.10.16  
16:45:42 -04'00'

May 20, 2019

Mr. Jeff S. Jordan  
Assistant General Counsel  
Office of Complaints Examination  
and Legal Administration  
Federal Election Commission  
1050 First Street, N.E.  
Washington, D.C. 20463

Re: MUR 7594

Dear Mr. Jordan:

The undersigned serves as counsel to the Louisiana House Democratic Campaign Committee and Louisiana Senate Democratic Campaign Committee. By this letter, we hereby respond to the complaint in the above referenced matter. The complaint, filed by Alexander Austin, is completely without merit. In his complaint, Mr. Austin alleges that my clients received contributions from a foreign corporation. In fact, this was not the case. The contributions received by my client were received from a federally registered political committee of an American subsidiary of the foreign corporation and were in full compliance with federal campaign finance laws. In response to this complaint, the committee exercised its due diligence and made an inquiry with respect to the legality of the contributions in question. In response, the donor (Embridge-DCP PAC) has provided my clients with the attached letters. In these letters, Embridge-DCP PAC has made assurances that the contributions that are the subject of this complaint are in full compliance with federal campaign finance law.

While we assume you have received a full accounting of the legality of these contributions directly from the donor, we believe the response from the donor puts our committee in compliance with federal law and any due diligence required of my clients in accordance with 11 C.F.R. § 103.3. Therefore, we respectfully request that the Commission immediately dismiss this matter.

If you have any questions regarding this Response, my daytime number is (202) 479-1111. My email address is [reiff@sandlerreiff.com](mailto:reiff@sandlerreiff.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "N. Reiff".

Neil P. Reiff  
Counsel to the Louisiana House Democratic  
Campaign Committee and Louisiana Senate  
Democratic Campaign Committee



Enbridge DCP PAC  
5400 Westheimer Court  
Houston, Texas 77056

May 3, 2019

House Democratic Campaign Committee of Louisiana  
P.O. Box 4385  
Baton Rouge, LA 70821

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.

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 me at 202-347-3386 or [adam.parker1@enbridge.com](mailto:adam.parker1@enbridge.com).

Sincerely,

A handwritten signature in blue ink that reads "Adam C. Parker". The signature is written in a cursive style with a large initial "A".

Adam Parker  
Manager  
Enbridge-DCP PAC



Enbridge DCP PAC  
5400 Westheimer Court  
Houston, Texas 77056

May 3, 2019

Senate Democratic Campaign Committee of Louisiana  
P.O. Box 4385  
Baton Rouge, LA 70821

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Adam Parker  
Manager  
Enbridge-DCP PAC