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by Kathryn Ross  
Date: 2019.05.28  
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# CLARK HILL

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May 23, 2019

*By e-mail to [cela@fec.gov](mailto:cela@fec.gov)*  
Federal Election Commission  
Office of Complaints Examination  
and Legal Administration  
Attn: Kathryn Ross, Paralegal  
1050 First Street, NE  
Washington, DC 20463

**Re: MUR 7594**

Dear Ms. Ross:

Please be advised that this firm represents Rodney for Congress (“the Committee”) and its treasurer in his official capacity in connection with the above-referenced Matter Under Review.

We are in receipt of the complaint filed in this matter in which it is seemingly alleged that the Committee has accepted a contribution from Enbridge, Inc., a Canadian corporate entity (“Enbridge”), in violation of the FECA. The Committee has reviewed the complaint and the contribution at issue.

It appears that the complainant has conflated Enbridge with its U.S. subsidiary, Enbridge (US), Inc. (“Enbridge US”), and the political action committee sponsored by Enbridge US, Enbridge (U.S.) Inc. Political Action Committee (“Enbridge US PAC”). Enbridge US is a Delaware corporation, whose principal place of business is Houston, Texas, and the sponsor of Enbridge US PAC. While Enbridge US is a wholly owned subsidiary of Enbridge, it is clear that US subsidiaries of foreign companies may sponsor PACs that legally may contribute to federal candidates. This is the case here. The Committee accepted \$1,000 from Enbridge US PAC, not from Enbridge, on December 4, 2017, in full compliance with the Federal Election Campaign Act.

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We appreciate the opportunity to respond to this charge. Should you need additional information, please do not hesitate to contact my office.

Very truly yours,

*/s/ John Fogarty, Jr. /s/*

John G. Fogarty, Jr.



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

**STATEMENT OF DESIGNATION OF COUNSEL**

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# MUR 7594

Name of Counsel: John Fogarty, Jr.

Firm: Clark Hill, PLC

Address: 130 E. Randolph, Ste. 3900  
Chicago, IL 60601

Office#: 312-517-7555 Fax#: 312-517-7594

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

E-mail: jfogarty@clarkhill.com

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.

5/23/19  
Date

Matt Butcher  
(Signature - Respondent/Agent/Treasurer)

Campaign Manager  
Title

Matt Butcher  
(Name - Please Print)

**RESPONDENT:** Rodney For Congress  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: P.O. Box 344  
(Please Print)

Taylorville, IL 62568-0344

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

Office#: 217-891-3228 Fax#: \_\_\_\_\_

E-mail: info@electrodney.com

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.