

JONES DAY

51 LOUISIANA AVENUE, N.W. • WASHINGTON, D.C. 20001.2113
 TELEPHONE: +1.202.879.3939 • FACSIMILE: +1.202.626.1700

DIRECT NUMBER: (202) 879-3986
 MSOWARDSNEWTON@JONESDAY.COM

May 9, 2019

Kathryn Ross
 Federal Election Commission
 Office of General Counsel
 Office of Complaints Examination
 & Legal Administration
 1050 First Street, NE
 Washington, DC 20002

Re: Response to Complaint in MUR 7594

Dear Ms. Ross:

This Firm represents Culberson for Congress and Jennifer Imle Naedler, in her capacity as treasurer (collectively, the “Committee”), in the above-captioned matter. The complaint erroneously alleges that the Committee accepted contributions from a foreign corporation, Enbridge Inc., in violation of the ban on contributions from foreign nationals. In fact, the Committee accepted contributions only from a separate segregated fund of Enbridge’s U.S. subsidiary. Because such contributions are permissible on their face and there is no evidence that suggests the Committee received any illegal contributions from Enbridge Inc., the Commission should find no reason to believe a violation of the Federal Election Campaign Act (“Act”) occurred and dismiss the complaint.

The complaint wrongly alleges that “a foreign (Canadian) company (Enbridge Inc.) has made hundreds of contributions directly to American political campaigns and dozens of American political party committees; likewise, hundreds of American political campaigns and dozens of American political party committees accepted contributions from a foreign (Canadian) company (Enbridge Inc.)” But, in fact, a review of Reports publicly filed with the Commission shows that these contributions were made by Enbridge (U.S.) Inc. Political Action Committee (Enbridge-DCP PAC), the connected PAC of a domestic corporation incorporated in Delaware and headquartered in Houston, Texas.

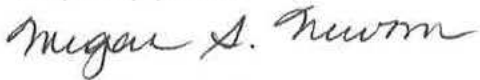
Under 11 C.F.R. § 110.20(i), the contributions to the Committee (and indeed all the PAC’s contributions) appear perfectly legal. The complaint alleges no facts that even suggest Enbridge-DCP PAC’s contributions were unlawful and points out that “hundreds” of other campaigns, all of whom presumably want to abide by the FECA, have accepted these contributions over a number of cycles. As such, the Commission should find no reason to believe a violation of the Act occurred, dismiss the complaint, and close the file. Further, we note that the Committee is in the

MAY 16 AM 9:08
 OFFICE OF
 GENERAL COUNSEL

May 9 , 2019
Page 2

process of winding down its operations and wishes to terminate in the near future. In light of this, we respectfully request that the Commission act expeditiously to dismiss this complaint so that the Committee may proceed with the filing of a termination report.

Very truly yours,

A handwritten signature in cursive script that reads "Megan S. Newton".

Megan Sowards Newton