Digitally signed by Kathryn Ross Date: 2019.05.10 14:11:51 -04'00'

#### Donna García Davidson ATTORNEY AND COUNSELOR AT LAW P.O. BOX 12131 AUSTIN, TEXAS 78711

Telephone: 512.775.7625 Toll Free Fax: 877.200.6001 E-mail: donna@dgdlawfirm.com Website: www.dgdlawfirm.com

May 9, 2019

Via Email: cela@fec.gov
Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Kathryn Ross, Paralegal
1050 First Street, NE
Washington, DC 20463

Re: Texans for Dade; MUR 7594

Dear Ms. Ross:

On behalf of my client, Dade Phelan, we respectfully request that the above-referenced Complaint be dismissed as it does not warrant the use of Commission resources. There is no basis in fact or law for this Complaint against my client.

The Complaint alleges that my client, among many others, may have solicited, accepted, or received a contribution from a foreign national in violation of federal law. As you may know, the Texas Ethics Commission's rules also prohibit contributions from foreign nationals. As we clearly demonstrate with the enclosed exhibits, the contribution was from a political action committee (PAC) that has long been registered with the Texas Ethics Commission.

In light of the evidence presented in the exhibits and the sworn facts, we respectfully request dismissal of the Complaint against my client.

Sincerely,

Donna García Davidson

Attorney and Counselor at Law

Enclosures: Exhibits A-C

# **EXHIBIT A**

#### **FEC COMPLAINT MUR 7594** DADE PHELAN AFFIDAVIT

State of Texas

§

**County of Travis** 

§

BEFORE ME, the undersigned authority, personally appeared Dade Phelan, a person known to me or identified to me by his Texas driver's license, who upon his oath stated:

I, Dade Phelan, hereby file this Response to the Federal Election Commission's (FEC) Complaint identified as MUR 7594. I swear, under penalty of perjury, that I have read the Response prepared by my attorney.

I swear that all the factual statements made in this Affidavit and in the Response are in all things true and correct. I have never solicited contributions from any foreign national and my campaign would never do so. I have personal knowledge of the statements made in the Response and am fully and legally capable of making this Affidavit. I respectfully request that the FEC dismiss the Complaint as it is without merit.

Further affiant sayeth not.

ADE PHELAN

SWORN AND SUBSCRIBED by Dade Phelan on this

**ERIC A VINING** Notary ID #131097944 My Commission Expires

April 21, 2021

which my hand and official seal of office.

day of May, 2019, to witness

Notary Public in and for the State of

# **EXHIBIT B**

Texas Ethics Commission P.O. Box 12070 Austin, Texas 78711-2070 (512) 463-5800

1-800-325-8506

#### APPOINTMENT OF A CAMPAIGN TREASURER BY A GENERAL-PURPOSE COMMITTEE

FORM GTA PG 1

See GTA INSTRUCT	ом Guide for detailed instructions.		OFFICE USE ONLY
COMMITTEE NAME	Spectra Energy Corp Political Action	Committee	RECEIVED
3) ACRONYM	Spectra DCP PAC	c c	APR 14 2008
COMMITTEE ADDRESS	ADDRESS / POBOX, APT / SUITE #; 5400 Westheimer Court  Houston, TX-77056	CITY; STATE. ZIP CODE	Texas Ethics Commission
5 REPORTING TYPE	REGULAR [	MONTHLY P	Date Processed  RCCESSED APR 1 4 2008
6 CAMPAIGN TREASURER NAME	Ms. Anne N. Moore	MI NICKNAME	LAST SUFFIX
CAMPAIGN TREASURER STREET ADDRESS (Residence or busine)	STREET ADDRESS (NO POBOX PLEASE): APT/SI 5400 Westheimer Court Houston, TX 77056	UITE#; CITY; STATE;	ZIP CODE
E CAMPAIGN TREASURER MAILING ADDRESS Serme as above	ADDRESS / POBOX: APT/SUITE #; 5400 Westheimer Court Houston, TX 77056	CITY; STATE; ZIP CODE	
CAMPAIGN TREASURER PHONE	( 713 ) 627-4555	EXTENSION	
10 PERSON APPOINTING TREASURER	FiRST Brenda B. Wisniewski	MI LAST	SUFFIX
SIGNATURE	I understand that I have been appoint committee and that I am responsible fines for failure to do so. I am aware from corporations and labor organizations	for filing all required reports of the restrictions in title 15 of	and that I may be subject to
ASSISTANT CAMPAIGN TREASURER	Ritu K. Talwar	MI LAST	SUFFIX
ASSISTANT CAMPAIGN TREASURER ADDRESS	ADDRESS /POBOX; APT/SUITE#; 5400 Westheimer Court, Suite 6O-45 Houston, TX 77056	CITY; STATE; ZIP CODE	
ASSISTANT CAMPAIGN TREASURER PHONE	AREA CODE PHONE NUMBER ( 713 ) 989-1784	EXTENSION	
	CONTINUI This appointment is effective on th	E ON PAGE 2 e date it is filed with the cor	nmission.

Texas Ethics Commission P.O. Box 12070 Austin, Texas 78711-2070

(512) 463-5800

1-800-325-8506

#### GENERAL-PURPOSE COMMITTEE:

#### FORM GTA PG 2

CONTROLLINGE	ENTITYINFORMATIO	N		PG 2				
15 COMMITTEENAM	=		<del> </del>					
	– p Political Action Committ	tee						
16	FULL NAME OF CONTROLLING ENTITY							
1	Spectra Energy Corp							
CONTROLLING ENTITY INFORMATION	ACRONYM							
	FULL NAME OF CONTROLLING	FULL NAME OF CONTROLLING ENTITY						
	ACRONYM	• · · · · · • • • · · · · · · · · · · ·						
	FULL NAME OF CONTROLLING	ENTITY						
	ACRONYM	• • • • • • • • •						
	FULL NAME OF CONTROLLING	ENTITY						
	ACRONYM							
17]	First	МІ	Last	Sutfix				
CONTRIBUTION DECISION MAKERS	First	мі	Last	Suffix				
	First	мг	Lest	Suffix				
	First	MI	Lest	Suffix				
			· · · · · · · · · · · · · · · · · · ·					
	First	MI	Lest	Suffix				
18	First	МІ	Lest	Suffix				
EXPENDITURE DECISION MAKERS	First	мі	Lest	Suffix				
, ,	First	MI	Last	Sutfix				
	First	MI	Last	Suffix				
	First	Mi	Last	Suffix				
			·					
	ATTACH ADD	DITIONAL COPIES O	F THIS FORM AS NEED	ED				

Texas Ethics Commission P.O. Box 12070 Austin, Texas 78711-2070 (512) 463-5800 1-800-325-8506

#### GENERAL-PURPOSE COMMITTEE:

#### FORM GTA

#### RECIPIENT COMMITTEES

PG3

19 COMMITTEENAME				
Spectra Energy Corp I	Political Action Committee			
20	Committeename			
RECIPIENT GENERAL PURPOSE COMMITTEES	Committee address; City, State; Zip Code			
	Committeename			
	Committee address; City, State; Zip Code			
	Committeename			
	Committee address; City, State; Zip Code			
	Committeename			
	Committee address; City, State, Zip Code			
	Committeename			
	Committiee address; City, State; Zip Code			
<del></del>				
	Committeerame			
	Committee address; City, State; Zip Code			
	Committeename			
	Committee address; City, State; Zip Code			
	ATTACH ADDITIONAL COPIES OF THIS FORM AS NEEDED			

ACK-LTR

### **TEXAS ETHICS COMMISSION**

P.O. Box 12070, Capitol Station Austin, Texas 78711-2070

Tom Harrison Chair

Ross Fischer Vice Chair

David A. Reisman Executive Director



Commissioners

Raymond R. "Tripp" Davenport, III Wilhelmina Delco Jim Graham Paula M. Mendoza David Montagne Nicholas C. Taylor

April 14, 2008



Ms. Anne N. Moore 5400 Westheimer Court Houston, Texas 77056

PROCESSED APR 1 4 2008

ETHICS COMMISSION ACCOUNT #

**COMMITTEE NAME** 

ASSISTANT TREASURER

DOCUMENT TYPE RECEIVED

EFFECTIVE DATE

FILING SCHEDULE

: 00063939

: Spectra Energy Corp Political Action Committee

: Ritu K. Talwar

: Appointment Of A Campaign Treasurer

By A General-Purpose Committee

: April 4, 2008

: Regular

Dear Ms. Moore:

The Ethics Commission has received the document referenced above appointing you as the committee's campaign treasurer. Please use the committee's Ethics Commission account number on all correspondence and documents that you submit to the Ethics Commission.

Reporting Requirements. You must file semiannual reports with the Ethics Commission not later than January 15 and July 15 of each year. Other reports are required in connection with elections. You should review the appropriate Ethics Commission campaign finance guide for more detailed information about filing requirements.

Note: You will be required to file reports until a campaign finance report designated as a "Dissolution Report" and the "Political Committee Affidavit of Dissolution" is filed, or you submit a written notice to the Texas Ethics Commission that you are resigning as treasurer.

Late-Filing Penalties. As the committee's campaign treasurer, you are personally responsible for filing the committee's reports and for any late-filing penalties in connection with the committee's reports. The late-filing penalty for most reports is \$500. For a report due eight days before an election and for the first semiannual report required to be filed after a primary election or after a general election, the late-filing penalty is \$500 for the first day the report is late and \$100 for each day thereafter that the report is late.

> Come visit our home page at http://www.ethics.state.tx.us on the Internet. (512) 463-5800 • 1-800-325-8506 • FAX (512) 463-8808 • TDD 1-800-735-2989 The Texas Ethics Commission does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of services

Forms, Schedules, and Guides. Forms, filing schedules, and guides are available on the Ethics Commission website at http://www.ethics.state.tx.us on the Internet. You are responsible for obtaining forms for filing reports and you should review the following information on our website.

- 1. Filing Schedule: www.ethics.state.tx.us/filinginfo/pacfilesch.htm Use the applicable annual filing schedule to determine when you will be required to file reports. Although the Ethics Commission may send notices to remind you of certain filing deadlines, it is your responsibility to make sure you file all required reports.
- 2. Electronic Filing Information: www.ethics.state.tx.us/whatsnew/elf\_filing\_info.htm Review this information to help you determine whether you are required to file electronically. If you are required to file electronically, you must submit the enclosed Form PASS.
- 3. Political Advertising Guide: www.ethics.state.tx.us/pamphlet/G03polad.htm Review this guide to help you understand carrier laws relating to political advertising.
- 4. Campaign Finance Guide for Political Committees: www.ethics.state.tx.us/guides/pac\_guide.pdf Review this guide to help you understand the restrictions and filing requirements in the campaign finance law.

Qualified Paper Filers. The forms and instructions you may need are available on the Ethics Commission website at www.ethics.state.tx.us/filinginfo/g&mpacfrm.htm on the Internet.

Please call our office at (800) 325-8506 or (512) 463-5800 if you have questions.

Sincerely,

Becky L(Levy

Director, Disclosure Filing Division

BLL/rld

**Enclosure** 

P.O. Box 12070

Austin, Texas 78711-2070

(512) 463-5800

1		NT: APPOINTMENT OF A CAMPAIGN BY A GENERAL-PURPOSE COMMITTEE	FORM AGTA PG 1
	See	AGTA Instruction Guide for detailed instructions.	1 Total pages filed: 3
2	COMMITTEE NAM Spectra Energy	Corp Political Action Committee 3 ACCOUNT# 00063939	OFFICE USE ONLY
4	COMMITTEE NAME	NEW	Date ReceiveRECEIVED
			MAR 23 2 <b>012</b>
5	ACRONYM	Spectra-DCP PAC	Texas Ethics Commission
6	COMMITTEE ADDRESS	NEW ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE	3/22/12 Date Processed
	4.1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	PRO	CESSED MAR 23 2017
7	REPORTING TYPE	REGULAR MONTHLY	Date Imaged
8	CAMPAIGN TREASURER NAME	NEW MS/MRS/MR FIRST MI NICKNAME  Ms. Ritu Ta	last suffix
9	CAMPAIGN TREASURER STREET ADDRESS (residence or business)	NEW STREET ADDRESS (NO PO BOX PLEASE); APT / SUITE #; CITY; STATE;	ZIP CODE
10	CAMPAIGN TREASURER MAILING ADDRESS Same as above	NEW ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE	
11	CAMPAIGN TREASURER PHONE	AREA CODE PHONE NUMBER EXTENSION  ( 713 )989-1784	*
12	PERSON APPOINTING TREASURER	FIRST MI LAST Spectra Energy Corp Political Action Committee E	suffix coard (Spectra-DCP PAC)
13	SIGNATURE	I understand that I have been appointed as the campaign treas committee and that I am responsible for filing all required reports fines for failure to do so. I am aware of the restrictions in title 15 of the from corporations and labor organizations.  Signature of Co	and that I may be subject to
14	ASSISTANT CAMPAIGN	NEW FIRST MI LAST Craig Hicks	SUFFIX
15	ASSISTANT CAMPAIGN TREASURER ADDRESS	NEW ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE 5400 Westheimer Ct. Houston, TX 77056	
16	ASSISTANT CAMPAIGN TREASURER PHONE	AREA CODE PHONE NUMBER EXTENSION  ( 713 ) 627-5749	
(i	<del>(</del> }	CONTINUE ON PAGE 2  This appointment is effective on the date it is filed with the com	D 613071 mission.

P.O. Box 12070

Austin, Texas 78711-2070

(512) 463-5800

	ENDMENT: GENERAL-PURPOSE COMMITTEE TROLLING ENTITY INFORMATION					FORM AGTA PG 2	
17 COMMITTEE NAM Spectra End	ME ergy Co	orp Poli	tical Ac	tion Comm	nittee	18 ACCOUNT# 00063939	
19 CONTROLLING ENTITY INFORMATION	□ add □ delete	FULL NAME OF	CONTROLLING ENTI				
	□ add □ delete	· ACRONYM · ·	CONTROLLING ENTI				
	□ add □ delete	FULL NAME OF	CONTROLLING ENTI				
	add delete	FULL NAME OF	CONTROLLING ENTI				
20 CONTRIBUTION DECISION MAKERS	☐ add ☐ delete	First		MI	Last	Suffix	
Ð	add delete	First		MI	Last	Suffix	
	add delete	First		MI	Last	Suffix	
	add delete	First		MI	Last	Suffix	
	□ add □ delete	First	(2014 to -1)	MI	Last	Suffix	
21 EXPENDITURE DECISION MAKERS	□ add □ delete	First		MI	Last	Suffix	
	☐ add ☐ delete	First	at a sold was a sure to real real and a sold of the	MI	Last	Suffix	
s	□ add □ delete	First		MI	Last	Suffix	
	☐ add ☐ delete	First		МІ	Last	Suffix	
	add delete	First		MI	Last	Suffix	
	Α	TTACH ADD	OITIONAL CO	PIES OF THIS	FORM AS NEEDED	)	

P.O. Box 12070

Austin, Texas 78711-2070

(512) 463-5800

AMENDMENT: G RECIPIENT COMMITT	ENERAL-PURPOSE COMMITTEE EES	FORM AGTA PG 3
22 COMMITTEE NAME		23 ACCOUNT#
	orp Political Action Committee	00063939
24 RECIPIENT GENERAL PURPOSE COMMITTEES	Committee name  Committee address;  City;  State;	Zip Code
ADD	Committee name	
	Committee address; City; State;	Zip Code
ADD	Committee name	
	Committee address; City; State;	Zip Code
ADD	Committee name	na some e de l'administra de l'administra
	Committee address; City; State;	Zip Code
ADD	Committee name	
	Committee address; City; State;	Zip Code
ADD	Committee name	
	Committee address; City; State;	Zip Code
ADD	Committee name	
	Committee address; City; State;	Zip Code
	ATTACH ADDITIONAL COPIES OF THIS FORM AS NEEDED	

For Domestic and International Use

Visit us at usps.com



2nd 2nd Del. Day

□зРМ

3rd Day

Spectra Energy tn: Ritu Talway 5400 Westheimer Ct.

Houston, TX 77056

FOR PICKUP OR TRACKING visit www.usps.com

Call 1-800-222-1811

PHONE ( 713 , 989 - 1784

COD Fee

\$

Total Postage & Form



Mailing Label Label 11-B, March 2004

Post Office To Addressee

	TAL USE	ONE!	Employee Signature
very Attempt	Time	☐ AM	Employee Signature
Day		□ РМ	
Day very Attempt	Time		Employee Signature
very Attempt	11110	□ AM	
Day		□рм	
ivery Date	Time	Пам	Employee Signature
55.7	100000000	LI AM	
Day		□РМ	
ISTOMER US	SE ONLY		
MENT BY ACCOUN	Т	WAIVER	OF SIGNATURE (Domestic Mail Only)
ress Mail Corporate		ATTENDED AND ARE THE	n merchandise insurance is void if quests waiver of signature.
		wish delivery	to be made without obtaining signature or addressee's agent (if delivery employee.
eral Agency Acct. N	lo, or	udges that ar	hole can be left in secure location) and the
tal Service Acct. No	. \$	authorize that	delivery employee's signature constitutes
	2	valid proof of	delivery
NO DELIVER	V REPORT OF THE PARTY OF		
Weekend Ho	liday	Mailer Signati	ur <b>o</b>
): (PLEASE PRINT)	PHONE	( )	
			11-40
090 00020		_ //	
TV .	CLhi	10	NINITULI DI YLUVU
Tx :	Ethic	cs c	OMMUSTION
Tx :	Ethi	csc	ommission 121th 51
Tx :	Ethio 1 5	es c	14th St.
Tx :	Ethio	cs c	14th St.
TX :	Ethio L E	es c east ston	14th 54. Bldg. 10th F1.
TX : 20 Sam	Hou	cast ston	Bldg, 10th F1.
TX 20 Sam	Hou	cast ston	Bldg, 10th F1.
Sam	Hou Au	iast ston Stin.	Bldg, 10th f1.
Sam	Hou Au	iast ston Stin.	Bldg, 10th F1.
Sam	Hou Au	iast ston Stin.	Bldg, 10th f1.
Sam	Hou Au	iast ston Stin.	Bldg, 10th f1.
Sam	Hou Au	iast ston Stin.	Bldg, 10th f1.
Sam	How Au	cast ston stin. ot use for 1	Bldg, 10th F1. TX FOREIGN POSTAL CODES.)



When used internationally affix customs declarations (PS Form 2976, or 2976A).

RECEIVED

MAR 23 2012

**Texas Ethics Commission** 



USPS packaging products have been awarded Cradle to Cradle Certification<sup>SM</sup> for their ecologically-intelligent design. For more information go to mbdc.com/usps

This packaging is the property of the U.S. Postal Service® and is provided solely for use in sendino Express Mail® shioments.

Please recycle.



Flat Rate or Weight

## TEXAS ETHICS COMMISSION Ock Lt.

P.O. Box 12070, Capitol Station Austin, Texas 78711-2070

Tom Ramsay Chair

Jim Clancy Vice Chair

David A. Reisman Executive Director



March 23, 2012

Commissioners

Hugh C. Akin Tom Harrison Paul W. Hobby Bob Long Paula M. Mendoza Chase Untermeyer

PROCESSED MAR 2 3 2012

Ms. Ritu Talwar 5400 Westheimer Ct. Houston, Texas 77056

ETHICS COMMISSION ACCOUNT #

**COMMITTEE NAME** 

ASSISTANT TREASURER

DOCUMENT TYPE RECEIVED

: 00063939

: Spectra Energy Corp PAC

: Craig Hicks

: Amendment: Appointment of a Campaign Treasurer by a

**General-Purpose Committee** 

EFFECTIVE DATE

: March 22, 2012

FILING SCHEDULE : Regular

Dear Ms. Talwar:

The Ethics Commission has received the document referenced above appointing you as the committee's campaign treasurer. Please use the committee's Ethics Commission account number on all correspondence and documents that you submit to the Ethics Commission.

**Reporting Requirements.** You must file semiannual reports with the Ethics Commission not later than January 15 and July 15 of each year. *These reports must be filed even if there was no activity during the reporting period.* Other reports are required in connection with elections. You should review the appropriate Ethics Commission campaign finance guide and filing schedule for more detailed information about filing requirements.

Note: You will be required to file reports until a campaign finance report designated as a "Dissolution Report" and the "Political Committee Affidavit of Dissolution" is filed, or you submit a written notice to the Texas Ethics Commission that you are resigning as treasurer.

**Late-Filing Penalties.** As the committee's campaign treasurer, you are personally responsible for filing the committee's reports and for any late-filing penalties in connection with the committee's reports. The late-filing penalty for most reports is \$500. For a report due eight days before an election and for the first semiannual report required to be filed after a primary election or after a general election, the late-filing penalty is \$500 for the first day the report is late and \$100 for each day thereafter that the report is late.



(OVER)



**Forms, Schedules, and Guides.** Forms, filing schedules, and guides are available on the Ethics Commission's website at <a href="http://www.ethics.state.tx.us">http://www.ethics.state.tx.us</a> on the Internet. You are responsible for obtaining forms for filing reports and you should review the following information on our website:

- 1. Filing Schedule: www.ethics.state.tx.us/filinginfo/pacfilesch.htm Use the applicable annual filing schedule to determine when you will be required to file reports. Although the Ethics Commission may send notices to remind you of certain filing deadlines, it is your responsibility to make sure you file all required reports.
- 2. Electronic Filing Information: www.ethics.state.tx.us/whatsnew/elf\_filing\_info.htm Review this information to help you determine whether you are required to file electronically. If you are required to file electronically, you must submit the enclosed Form PASS.

If you are filing electronically, please fill out and send to us the enclosed Form PASS to obtain a new password. The previous treasurer's password is no longer valid.

- 3. Political Advertising Guide: www.ethics.state.tx.us/guides/G08polad.htm Review this guide to help you understand certain laws relating to political advertising.
- 4. Campaign Finance Guide for Political Committees: **www.ethics.state.tx.us/guides/pac\_guide.pdf** Review this guide to help you understand the restrictions and filing requirements in the campaign finance law.

Qualified Paper Filers. The forms and instructions you may need are available on the Ethics Commission's website at www.ethics.state.tx.us/filinginfo/g&mpacfrm.htm on the Internet.

Please call our office at (512) 463-5800 if you have questions.

Sincerely,

Becky L. Levy

Director, Disclosure Filings Division

Bechy L. Lew

BLL/cmp

Enclosure



Texas Ethics Commission	P.O. Box 12070 Au	ıstin, Texas 78711-	2070 (512) 463	3-5800 (TDD 1-800-735-2989)			
AMENDMENT: TREASURER BY A				FORM AGTA PG 1			
See AGTA	See AGTA Instruction Guide for detailed instructions.						
2 COMMITTEE NAME Spectra Energy Corp Political	Action Committee (Spectra-DC		COUNT # 0063939	OFFICE USE ONLY			
4 COMMITTEE NEW	dge (U.S.) Inc. Political Action			Date Received CEIVED			
5 ACRONYM NEW Enbrid	dge-DCP PAC	700.	10000	MAR 10 2017  AE "exas athics Commission			
6 COMMITTEE NEW ADDRESS	ADDRESS / PO BOX; APT / SUIT	E#; CITY;	STATE; ZIP CODE	Date Processed OCESSED MAR 1 0 2017			
7 REPORTING NEW TYPE	REGULAR	MONTHLY		Dale imaged			
8 CAMPAIGN NEW TREASURER NAME	MS/MRS/MR FIRST	MI	NICKNAME	LAST SUFFIX			
9 CAMPAIGN TREASURER STREET ADDRESS (residence or business)	STREET ADDRESS (NO PO BOX PLE	EASE): APT / SUITE #.	CITY; STATE:	ZIP CODE			
TREASURER MAILING ADDRESS Same as above	ADDRESS / PO BOX: APT / SUITE	E#. CITY;	STATE; ZIP CODE				
11 CAMPAIGN NEW TREASURER PHONE	AREA CODE PHONE NU	JMBER	EXTENSION				
12 PERSON APPOINTING TREASURER	FIRST	Mi	LAST	SUFFIX			
comn fines from	nittee and that I am respon	nsible for filing a ware of the restrict	II required reports a ions in title 15 of the I	rer for this general-purpose nd that I may be subject to Election Code on contributions  LUAL  mpaign Treasurer			
14 ASSISTANT NEW CAMPAIGN TREASURER	FIRST	MI	LAST	SUFFIX			
15 ASSISTANT NEW CAMPAIGN TREASURER ADDRESS	ADDRESS / PO BOX; APT / SUITE	E# CITY;	STATE; ZIP CODE				
16 ASSISTANT NEW CAMPAIGN TREASURER PHONE	AREA CODE PHONE NUI	MBER E	EXTENSION				
This:	CONT appointment is effective o	TINUE ON PAGE on the date it is f		ission. \$10095032			

www.ethics.state.tx.us

Revised 09/01/2003



Legal Subsidiary Name Address Line 1 Address Line 2 Address Line 3

fax

REGEIVED

MAR 10 2017

Texas Ethics Commission

From: Ritu Talwar/Enbridy, In
No. of pages (including this cover): 0 2
Date: 3-10-17
if this transmission is not received in good order, please call:

>Message here<

This facsimile and its contents are private and confidential and are intended for the exclusive use of the addressee(s). If you are not the intended recipient, copying, scanning, forwarding or other distribution of this facsimile and its contents by any means is prohibited. If you believe you have received this facsimile in error, please notify the original sender immediately (collect if necessary) at the number above and destroy the original facsimile and all attachments. Thank you.

enbridge.com

P.O. Box 12070

Austin, Texas 78711-2070

(512) 463-5800

(TDD 1-800-735-2989)

## **AMENDMENT:** APPOINTMENT OF A CAMPAIGN TREASURER BY A GENERAL-PURPOSE COMMITTEE

#### FORM AGTA PG 1

	112/10011211		V
	See	1 Total pages filed: 2	
	COMMITTEE NAMI	OFFICE USE ONLY	
		litical Action Committee (Enbridge-DCP PAC) 00063939	RECEIVED
4	COMMITTEE NAME	Enbridge (U.S.) Inc. Political Action Committee	MAR 1 0 2017
5	ACRONYM	Enbridge-DCP PAC	Texas Ethics Commission
6	COMMITTEE ADDRESS	NEW ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE	Mar 8 2017 OCESSED MAR 102017
7	REPORTING TYPE	REGULAR MONTHLY	Date Imaged
8	CAMPAIGN TREASURER NAME	NEW MS/MRS/MR FIRST MI NICKNAME	LAST SUFFIX
9	CAMPAIGN TREASURER STREET ADDRESS (residence or business)	NEW STREET ADDRESS (NO PO BOX PLEASE); APT / SUITE #; CITY; STATE;	ZIP CODE
10	CAMPAIGN TREASURER MAILING ADDRESS same as above	NEW ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE	
11	CAMPAIGN TREASURER PHONE	NEW AREA CODE PHONE NUMBER EXTENSION	
12	PERSON APPOINTING TREASURER	FIRST MI LAST	SUFFIX
	SIGNATURE	I understand that I have been appointed as the campaign treasured committee and that I am responsible for filing all required reports fines for failure to do so. I am aware of the restrictions in title 15 of the from corporations and labor organizations.	and that I may be subject to
14	ASSISTANT CAMPAIGN TREASURER	NEW FIRST MI LAST	SUFFIX
15	ASSISTANT CAMPAIGN TREASURER ADDRESS	NEW ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE	10
16	ASSISTANT CAMPAIGN TREASURER PHONE	NEW AREA CODE PHONE NUMBER EXTENSION	
		CONTINUE ON PAGE 2	

This appointment is effective on the date it is filed with the commission.

D1009 50320

P.O. Box 12070

Austin, Texas 78711-2070

(512) 463-5800

AMENDME	AMENDMENT: GENERAL-PURPOSE COMMITTEE			FORM AGTA	
CONTROLLIN	G ENTI	TY INFORMATION	<u> </u>		PG <b>2</b>
17 COMMITTEE NAM	ИE	74070			18 ACCOUNT#
Enbridge (U.S.) Inc	. Political A	ction Committee (Enbridge	e-DCP PAC)		00063939
19 CONTROLLING ENTITY	☐ add	FULL NAME OF CONTROLLING EN			
INFORMATION	delete	Spectra Energy Corporat		* * * * * * * * * *	
		FULL NAME OF CONTROLLING EN	TITY		
	☑ add	Enbridge (U.S.) Inc.			
		ACRONYM			
		FULL NAME OF CONTROLLING EN	TITY		
	add delete	· ÁCRONYM · · · · · · · · · · · · · · · · · · ·		*******	
		FULL NAME OF CONTROLLING EN	FITV	- Managing o	
	add delete				
		ACRONYM	ne te de la 12 ne de 20 ne de		
20 CONTRIBUTION DECISION MAKERS	add delete	First	MI	Last	Suffix
(2) (2008/2016) (deep Verbook 54/2016)	add delete	First	MI	Last	Suffix
	add delete	First	MI	Last	Suffix
	add delete	First	MI	Last	Suffix
ь	add delete	First	MI	Last	Suffix
21 EXPENDITURE DECISION MAKERS	add delete	First	MI	Last	Suffix
	add delete	First	М	Last	Suffix
	add delete	First	MI	Last	Suffix
	add delete	First	MI .	Last	Suffix
	add delete	First	MI	Last	Suffix
	Α	TTACH ADDITIONAL CO	OPIES OF THIS F	ORM AS NEEDED	A CONTRACTOR OF THE CONTRACTOR

# **EXHIBIT C**

#### April 26, 2019

Candidate or political Committee [address]
[city, state]
[P.O. Box 1205]
Colonial Heights, VA 23834]

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.

April 29, 2019 Page 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.

Sincerely,

Adam Parker

Enbridge-DCP PAC Manager