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By OGC/CELA at 7:27 am, Oct 10, 2024

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October 8, 2024

Federal Election Commission  
Complaints Examination & Legal Administration  
Attn: Trace Keeys, Paralegal  
1050 First St., NE  
Washington, D.C. 20463

**Re: Matter Under Review 8316 (Amazon.com Services LLC Separate Segregated Fund)**

Dear Commissioners,

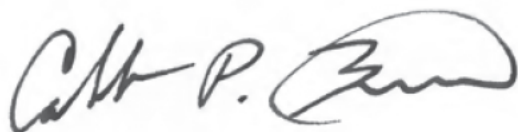
On September 24, 2024, the Federal Election Commission ("FEC" or "Commission") notified our clients, Amazon.com Services LLC Separate Segregated Fund (Amazon PAC) and Brian Huseman in his official capacity as Treasurer, of a complaint filed by Mr. Jacob Thomas against Congresswoman Terri Sewell's re-election campaign. The complaint alleges that the campaign – Terri Sewell for Congress – "made multiple prohibited contributions" to several corporate PACs, including Amazon PAC. Based on Amazon PAC's FEC reports and internal accounting records, Amazon PAC did not receive a contribution from Terri Sewell for Congress.

Rather, it appears Terri Sewell for Congress simply misreported Amazon PAC – as opposed to Amazon.com, Inc. – as the recipient of various operating expenditures. Excerpts from the Terri Sewell for Congress FEC reports attached to the complaint describe the purpose of the disbursements as "campaign office supplies" and "event supplies." Such purposes are consistent with payments to Amazon.com, Inc., a well-known online purveyor of goods, and not contributions to Amazon PAC.

Counsel to Terri Sewell for Congress has since confirmed to us that the campaign did not contribute to Amazon PAC, but had mistakenly disclosed Amazon PAC – instead of Amazon.com, Inc. – as the recipient of the operating expenditures. We understand Terri Sewell for Congress will amend its FEC reports to correct this error.

Accordingly, the Commission should find no reason to believe that Amazon PAC and Brian Huseman in his official capacity as Treasurer violated the law and should dismiss them from this matter.

Sincerely,



Caleb P. Burns  
Andrew G. Woodson



FEDERAL ELECTION COMMISSION  
1050 First Street, NE  
Washington, DC

# STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

E-MAIL: [cela@fec.gov](mailto:cela@fec.gov)

AR/MUR/RR/P-MUR# MUR 8316

Name of Counsel: Caleb P. Burns & Andrew G. Woodson

Firm: Wiley Rein LLP

Address: 2050 M Street, NW

Washington, DC 20815

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E-mail: [cburns@wiley.law](mailto:cburns@wiley.law); [awoodson@wiley.law](mailto:awoodson@wiley.law)

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.

10/2/24  
Date

Brian Huseman  
(Signature - Respondent/Agent/Treasurer)

Treasurer

Title

Brian Huseman

(Name - Please Print)

**RESPONDENT:** Amazon.com Services LLC Separate Segregated Fund (Amazon PAC)  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: \_\_\_\_\_  
(Please Print)

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

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

Office#: \_\_\_\_\_

Fax#: \_\_\_\_\_

E-mail: \_\_\_\_\_

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.

Rev. 2023



FEDERAL ELECTION COMMISSION  
1050 First Street, NE  
Washington, DC

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10/2/24  
Date

Brian Huseman  
(Signature - Respondent/Agent/Treasurer)

Treasurer

Title

Brian Huseman

(Name - Please Print)

**RESPONDENT:** Brian Huseman, in his official capacity as Treasurer of Amazon PAC  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: \_\_\_\_\_  
(Please Print)

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

Office#: \_\_\_\_\_ Fax#: \_\_\_\_\_

E-mail: \_\_\_\_\_

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