

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)

FEC IDENTIFICATION NUMBER

AMANDA MAKKI FOR CONGRESS

C00708263

Mailing Address PO BOX 47483

City State ZIP Code
ST PETERSBURG FL 33743-

To Whom It May Concern,

With respect to Item 4, the candidate has already personally reimbursed the Committee for the five Duke Energy payments noted on the RFAI. Those reimbursements will be reflected on the July 15th quarterly report since they were made on 5/15/2022.

The Committee had paid a portion of those electricity bills based on a reasonable and good-faith understanding that this was permissible because the Committee has used her home office seven days a week as the Committee's exclusive campaign headquarters. While the FEC rules and advisory opinions previously permitted campaign funds to pay for these expenses, the rules were subsequently amended to prohibit this, even while the rules continue to allow campaign funds to pay for rent on other real property that a candidate personally owns. See, e.g., FEC AO 1995-08 (Stupak); FEC, Explanation and Justification for Final Rules on Personal Use of Campaign Funds (hereinafter, "Personal Use E&J?"), 60 Fed. Reg. 7,862, 7,865 (Feb. 9, 1995). The FEC's varying regulatory treatment of this type of expense over the years demonstrates the Committee's error in paying these expenses was reasonable and unintentional.

In the course of reviewing its payments in response to the RFAI, the Committee also noticed several payments to Spectrum for internet service at the candidate's personal residence that are not permitted under the FEC's current rule. Although these payments were not noted in the RFAI, the candidate also has personally reimbursed those expenses sua sponte. Again, those reimbursements will be reflected on the July 15th quarterly report since they were made on 5/15/2022.

Lastly, the purpose of the Geico Insurance payment noted on the RFAI has been amended to reflect that it was campaign-related. Specifically, the payment was for insurance on a vehicle that was used exclusively for campaign purposes. The FEC rules expressly permit use of campaign funds for this expense. See 11 C.F.R. § 113.1(g)(1)(ii)(D); Personal Use E&J, 60 Fed. Reg. at 7,869.

Thank you
Nancy Marks
Treasurer