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SECRETARY OF THE SENATE

09 FEB 18 AM 11:07

Thad H. Westbrook
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February 12, 2009

Ms. Lauren Lien
Campaign Finance Analyst
Federal Election Commission
Washington, DC 20463

RE: Letters inquiring about 2008 October Quarterly Report (7/1/08-9/30/08), 12-Day Pre-General Report (10/1/08-10/15/08), and 30-Day Post-General Report (10/16/08-11/24/08)

Dear Ms. Lien:

Thank you for your correspondence of January 13, 2009. As the new Treasurer for Lindsey Graham for Senate (ID C00364505), I have studied the committee's reports in order to answer your questions. Our responses are below:

October Quarterly Report (7/1/08-9/30/08)

1. The transfer of \$3,133.30 on 9/29/08 from the 2008 Senators' Classic Committee should have included three itemized memo entries on Schedule A. It was our committee's intention to include them in the original report, but the memo items were entered incorrectly in our compliance software and did not print on the report as anticipated. Enclosed is an amended report that includes the itemized memo entries.
2. The totals in our Column B figures were incorrect because of an error in 2007 that carried forward through 2008. We mistakenly reported a receipt of \$3,000.00 from Bechtel PAC on 8/12/07 that appeared on the most recent amended version of the 2007 October 15 Quarterly Report. While this check was entered in our compliance software, we never deposited it in our bank account. The contribution was returned to the sender because the amount would have exceeded the Primary 2008 limit and presumptive redesignation is not allowed for donations from PACs. While we returned the check, the record of the contribution remained in our software for several months until it was discovered and removed.

This \$3,000.00 error caused discrepancies in Column B for Lines 6(a), 6(c), 11(c), 11(e) and 16 beginning with the 2007 October 15 Quarterly Report. Enclosed are all amended reports affected by this mistake.

3. The previous version of this report mistakenly omitted two interest payments on Schedule A and Line 15 of the Summary Page. The enclosed amended report includes the following:
 - Receipt of \$1,966.07 in interest from BB&T on 8/29/08
 - Receipt of \$2,273.25 in interest from BB&T on 9/30/08

12-Day Pre-General Report (10/1/08-10/15/08)

1. Please see the above explanation as to why the totals for Column B were incorrect. Enclosed is an amended 12-Day Pre-General Report.

30-Day Post-General Report (10/16/08-11/24/08)

1. Please see the above explanation as to why the totals for Column B were incorrect. Enclosed is an amended 30-Day Post-General Report.
- 2a. The contribution from John Boyd on 10/16/08 for \$1,000 was made on-line via a credit card. When individuals go to our website and make a donation, our credit card vendor deposits the money in their account and sends via check a lump sum amount of all of the donations made within a specific date range—usually at the end of each month. Upon receiving the lump sum check, a staff member downloads a corresponding spreadsheet that contains all of the contribution information and enters the appropriate data in our compliance software.

During the 48-hour notice period, we adjusted our normal routine to include checking with our vendor daily for new contributions each evening and immediately reporting any over \$1,000. It appears that the contribution from John Boyd was made late at night after we had already checked for contributions that day and was not included in the report the next day. The narrow window of time between checking for contributions and midnight allowed for a contribution to slip through that should have been reported on a 48-hour notice.

- 2b. The contribution from TACO PAC for \$2,000 was received by an agent of the campaign on 10/31/08 and forwarded to the campaign office for processing. The check arrived at the office after the election and was deposited immediately. Since the election was already over by then, we did not file a 48-hour notice.

In the future, we will adjust our procedures to ensure that agents of the campaign provide the appropriate information immediately upon receiving a contribution so we can file the 48-hour notices as required. We will also run reports from our credit card vendor that

include multiple days to eliminate any window of time for a contribution to be made after the report has been run.

Other Items in Enclosed Amended Reports

2008 July 15 Quarterly Report (5/22/08-6/30/08)

The previous version of this report included several entries on Schedule A for interest received that were incorrectly attributed to the General Election. The enclosed amended report has correctly attributed the interest to the Primary Election.

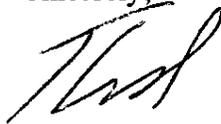
- \$354.96 on 5/29/08 from BB&T
- \$4,324.72 on 5/29/08 from BB&T
- \$573.20 on 5/30/08 from BB&T

We mistakenly reported two contributions on Schedule A from Michele McMorrان on 5/29/08 for \$2,300. There was only one contribution of \$2,300, so the duplicate entry has been removed.

If you have any questions or need any additional information, please contact me at (803) 255-5568.

With kind regards, I am,

Sincerely,



Thad H. Westbrook
Treasurer

Enclosure

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee

SECRETARY OF THE SENATE

09 FEB 18 AM 11:17

Office Use Only

1. NAME OF COMMITTEE (in full) USE FEC MAILING LABEL OR TYPE OR PRINT Example: If typing, type over the lines

Lindsey Graham for Senate

ADDRESS (number and street) P.O. Box 1801

Check if different than previously reported. (ACC) Columbia SC 29202

2. FEC IDENTIFICATION NUMBER C00364505 3. IS THIS REPORT NEW OR AMENDED (A) SC

4. TYPE OF REPORT (Choose One) (a) Quarterly Reports: April 15 Quarterly Report (Q1) July 15 Quarterly Report (Q2) October 15 Quarterly Report (Q3) January 31 Year-End Report (YE) Termination Report (TER)

(b) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R) Convention (12C) Special (12S) Election on in the State of (c) 30-Day POST-Election Report for the: General (30G) Runoff (30R) Special (30S) Election on 11 04 2008 in the State of SC

5. Covering Period 10 16 2008 through 11 24 2008

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete. Type or Print Name of Treasurer Thad H. Westbrook Signature of Treasurer Thad H. Westbrook Date 02 13 2009

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Table with 10 columns and 1 row. Office Use Only. FEC FORM 3 (Revised 02/2003)

20020110146

SUMMARY PAGE

of Receipts and Disbursements

FEC Form 3 (Revised 02/2003)

Page 2

Write or Type Committee Name

Lindsey Graham for Senate

Report Covering the Period:

From:

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| M | M | | D | D | Y | Y | Y | Y |
| 1 | 0 | 1 | 1 | 6 | 2 | 0 | 0 | 8 |

To:

| | | | | | | | | |
|---|---|--|---|---|---|---|---|---|
| M | M | | D | D | Y | Y | Y | Y |
| 1 | 1 | | 2 | 4 | 2 | 0 | 0 | 8 |

| | COLUMN A This Period | COLUMN B Election Cycle-to-Date |
|---|-------------------------|------------------------------------|
| 6. Net Contributions (other than loans) | | |
| (a) Total Contributions (other than loans) (from Line 11(e))..... | 144817.40 | 8397344.54 |
| (b) Total Contribution Refunds (from Line 20(d))..... | 0.00 | 118535.55 |
| (c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))..... | 144817.40 | 8278808.99 |
| 7. Net Operating Expenditures | | |
| (a) Total Operating Expenditures (from Line 17)..... | 742539.38 | 5518125.06 |
| (b) Total Offsets to Operating Expenditures (from Line 14)..... | 59.25 | 146768.41 |
| (c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))..... | 742480.13 | 5371356.65 |
| 8. Cash on Hand at Close of Reporting Period (from Line 27)..... | 2893953.46 | |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)..... | 0.00 | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)..... | 0.00 | |

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-694-1100

29020110147

**POST-ELECTION DETAILED
SUMMARY PAGE**

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FEC Form 3 (Revised 07/05)

Report of Receipts and Disbursements

Page 5

- . If the candidate participated in the general election, use this form for the 30-day Post-General report.
- . If the candidate did NOT participate in the general election, use this form for the Year-end report covering through December 31 of the election year (due on January 31).

This form is used in lieu of filling out Line Numbers 6 through 7 on Page 2 (Summary Page) and Pages 3 and 4 (the Detailed Summary Page) for the last report filed by a candidate during the current election cycle.

Write or Type Committee Name

Lindsey Graham for Senate

Report Covering the Period:

From:

MM DD YYYY
10 16 2008

To:

MM DD YYYY
11 24 2008

I. RECEIPTS

| | COLUMN A Total this Period | COLUMN B Election Cycle Total as of <small>MM DD YYYY</small> 11 04 2008 (date of general election) | COLUMN C Total for <small>MM DD YYYY</small> 11 05 2008 (date after general election) through <small>MM DD YYYY</small> 11 24 2008 (last day of reporting period) |
|---|--------------------------------------|--|--|
| 11. CONTRIBUTIONS (other than loans) FROM: | | | |
| (a) Individuals/Persons Other than Political Committees | | | |
| (i) Itemized (Use Schedule A) | 49908.40 | 6190864.16 | 0.00 |
| (ii) Unitemized | 1109.00 | 233768.66 | 0.00 |
| (iii) Total of contributions from individuals | 51017.40 | 6424632.82 | 0.00 |
| (b) Political Party Committees | 0.00 | 28950.00 | 0.00 |
| (c) Other Political Committees | 93800.00 | 1943761.72 | 0.00 |

29020110148

**POST-ELECTION DETAILED
SUMMARY PAGE
Report of Receipts and Disbursements**

FEC Form 3 (Revised 1/01)

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Page 6

COLUMN A
Total this Period

COLUMN B
Election Cycle Total as of *
(date of general Election)
(* See page 5 for date)

COLUMN C
Total for * (date after general election)
Through * (last day of reporting period)
(* See page 5 for dates)

(d) The Candidate

0.00

0.00

0.00

(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c) and (d))

144817.40

8397344.54

0.00

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

0.00

212071.32

0.00

13. LOANS:

(a) Made or Guaranteed by the Candidate

0.00

0.00

0.00

(b). All Other Loans

0.00

0.00

0.00

(c). TOTAL LOANS (add Lines 13(a) and (b))

0.00

0.00

0.00

14. OFFSETS TO OPERATING EXPENDITURES (refunds, rebates, etc)

59.25

146768.41

0.00

15. OTHER RECEIPTS (Dividends, Interest, etc)

7973.67

395890.12

0.00

16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)

152850.32

9152074.39

0.00

29020110149

**POST ELECTION DETAILED
SUMMARY PAGE**

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FEC Form 3 (Revised 1/01)

Report of Receipts and Disbursements

Page 7

Write or Type Committee Name

Lindsey Graham for Senate

Report the covering period

From:

10

16

2008

To:

11

24

2008

II. DISBURSEMENTS

| COLUMN A Total this period | COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date) | COLUMN C Total for * Through * (date after general election) (last day of reporting period) (* See page 5 for date) |
|---|---|--|
| 17. OPERATING EXPENDITURES | | |
| 742539.38 | 5518125.06 | 130894.80 |
| 18. TRANSFER TO OTHER AUTHORIZED COMMITTEES | | |
| 0.00 | 14990.00 | 0.00 |
| 19. LOAN PAYMENTS | | |
| (a) Of Loans Made or Guaranteed by the Candidate | | |
| 0.00 | 0.00 | 0.00 |
| (b) Of All Other Loans | | |
| 0.00 | 0.00 | 0.00 |
| (c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and 19(b)) | | |
| 0.00 | 0.00 | 0.00 |
| 20. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | | |
| 0.00 | 102048.75 | 0.00 |
| (b) Political Party Committees | | |
| 0.00 | 0.00 | 0.00 |

29020110150

**POST ELECTION DETAILED
SUMMARY PAGE**

FEC Form 3 (Revised 1/01)

Report of Receipts and Disbursements

| COLUMN A Total this period | COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date) | COLUMN C Total for * Through * (date after general election) (last day of reporting period) (* See page 5 for date) |
|--|---|--|
| (c) Other political committees (such as PACs) | | |
| 0.00 | 16486.80 | 0.00 |
| (d) TOTAL CONTRIBUTION REFUNDS (See Lines 20(a), (b) and (c)) | | |
| 0.00 | 118535.55 | 0.00 |
| 21. OTHER DISBURSEMENTS | | |
| 37000.00 | 570822.00 | 37000.00 |
| 22. TOTAL DISBURSEMENTS (add lines 17, 18, 19(c), 20(d), and 21) | | |
| 779539.38 | 6222472.61 | 167894.80 |

III. NET CONTRIBUTIONS (OTHER THAN LOANS)

(Note: Substitute in lieu of Line #6 of Summary Page for this report only; subtract line 20(d) from Line 11(e))

| | | |
|-----------|------------|------|
| 144817.40 | 8278808.99 | 0.00 |
|-----------|------------|------|

IV. NET OPERATING EXPENDITURES

(Note: Substitute in lieu of Line #7 of Summary Page for this report only; subtract line 14 from Line 17)

| | | |
|-----------|------------|------|
| 742480.13 | 5371356.65 | 0.00 |
|-----------|------------|------|

V. CASH SUMMARY

| | |
|--|------------|
| 23. CASH ON HAND AT BEGINING OF REPORTING PERIOD | 3520642.52 |
| 24. TOTAL RECEIPTS AT THIS PERIOD (from Line 16)..... | 152850.32 |
| 25. SUBTOTAL(add Line 23 and Line 24) | 3673492.84 |
| 26. TOTAL DISBURSEMENTS AT THIS PERIOD (from Line 22)..... | 779539.38 |
| 27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (Subtract Line 26 from Line 25)..... | 2893953.46 |

29020110151

United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

THE PRECEDING DOCUMENT WAS:

HAND DELIVERED _____

Date of Receipt

USPS FIRST CLASS MAIL _____

Postmark

USPS REGISTERED/CERTIFIED _____

2-13-09

Postmark

USPS PRIORITY MAIL _____

Postmark

DELIVERY CONFIRMATION OR SIGNATURE CONFIRMATION LABEL

USPS EXPRESS MAIL _____

Postmark

OVERNIGHT DELIVERY SERVICE:

SHIPPING DATE

NEXT BUSINESS DAY DELIVERY

FEDERAL EXPRESS _____

UPS _____

DHL _____

AIRBORNE EXPRESS _____

RECEIVED FROM FEDERAL ELECTION COMMISSION _____

Date of Receipt

POSTMARK ILLEGIBLE

NO POSTMARK

FAX _____

Date of Receipt

OTHER _____

Date of Receipt or Postmark

PREPARER

DH

DATE PREPARED

2-18-09

29020110152

Lindsey Graham for Senate
PO Box 1801
Columbia, SC 29202

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OF THE RETURN ADDRESS. FOLD AT DOTTED LINE
CERTIFIED MAIL™



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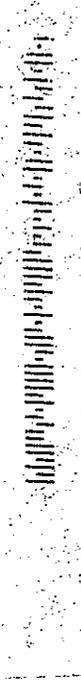
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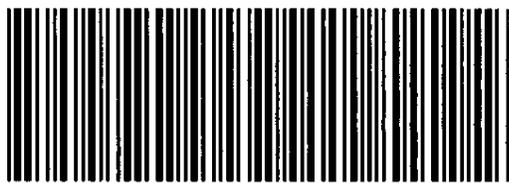
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IN THE SENATE
POST OFFICE**

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P.O. BOX 5109
ALEXANDRIA, VA 22301-0109



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