



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 1, 2015

THAD H. WESTBROOK, TREASURER
LINDSEY GRAHAM 2016
PO BOX 2732
COLUMBIA, SC 29202

Response Due Date

12/07/2015

IDENTIFICATION NUMBER: C00578757

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2015 - 09/30/2015)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule A-P of your report discloses a transfer to your committee from an authorized committee of the same candidate. Please be advised that when a committee transfers funds from an authorized committee of the same candidate it may be necessary to include information about the original contributions on Schedule A-P as memo entries. Please amend the report to disclose the original contributions as memo entries or clarify that the transfer does not require memo itemization. (52 U.S.C. § 30104(b)(3)(C) (formerly 2 U.S.C. §434(b)(3)(C)) and 11 CFR § 104.3(a)(4)(iii))
2. Schedule A-P of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). The Commission notes your additional explanation regarding the committee's corrective action taken for some of these contributions.

An individual or a political committee other than an authorized committee or a qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,700 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value

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made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR §§ 110.1(b), (e) and (k), and 102.13(c))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

Please be reminded that all refunds, redesignations and reattributions must be made within 60 days of receipt of the contribution. To date, one or more of the apparent excessive contributions have not been refunded, redesignated, or reattributed.

For reattributions, the funds can be retained if, within 60 days of receipt, the excessive amount was properly reattributed to another person. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor who signed the check an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount was properly designated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) the committee redesignates by presumption the excessive portion of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) A contribution can only be redesignated to a previous election to the extent that the contribution does not

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exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt, the excessive amount must be refunded. (11 CFR § 103.3(b)(1))

Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 28(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B-P of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A-P of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund or redesignate and/or reattribute the excessive amount will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1138.

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Sincerely,

A handwritten signature in black ink that reads "Carolina Mongeon". The signature is written in a cursive, flowing style.

Carolina Mongeon
Senior Campaign Finance Analyst
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions
Lindsey Graham 2016 (C00578757)**

Excessive Contributions from Committees

Contributor Name	Date	Amount	Election
CB&I PAC	3/27/15	\$1,000.00	P2016
CB&I PAC	4/10/15	\$1,000.00	P2016
Chicago Bridge & Iron Company Political Action Committee	4/10/15	\$1,000.00	P2016
CB&I PAC	7/21/15	\$2,500.00	P2016

Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
B-4 Holdings, LLC	7/16/15	\$5,200.00	P2016
B-4 Holdings, LLC	8/31/15	\$2,700.00	P2016
B-4 Holdings, LLC	9/22/15	-\$2,500.00	P2016
B-4 Holdings, LLC	9/22/15	-\$200.00	P2016
Bayly, Daniel Mr.	9/29/15	\$2,700.00	P2016
Bayly, Daniel Mr.	9/29/15	\$2,700.00	P2016
Bayly, Pamela C. Mrs.	9/29/15	\$2,700.00	P2016
Bayly, Pamela C. Mrs.	9/29/15	\$2,700.00	P2016
Best, W. H.	9/30/15	\$10,000.00	P2016
Cassels, William Tobin III	2/24/15	\$2,700.00	P2016
Cassels, William Tobin Mr. III	9/30/15	\$5,400.00	P2016
Cassels, William Tobin Jr.	2/24/15	\$2,700.00	P2016
Cassels, William Tobin Mr. Jr.	9/30/15	\$5,400.00	P2016
Coppedge, Judith C.	4/16/15	\$2,700.00	P2016
Coppedge, Judith C. Mrs.	9/30/15	\$800.00	P2016
Coppedge, Judith C. Mrs.	9/30/15	\$1,900.00	P2016
Coppedge, Lloyd W.	4/16/15	\$2,700.00	P2016
Coppedge, Lloyd W.	9/30/15	\$2,700.00	P2016
Davis, Gary Mr.	6/25/15	\$2,700.00	P2016
Davis, Gary Mr.	9/30/15	\$1,000.00	P2016
Drew, Lynn Mrs.	6/29/15	\$2,700.00	P2016
Drew, Lynn Mrs.	9/28/15	\$2,700.00	P2016

**Excessive, Prohibited, and Impermissible Contributions
Lindsey Graham 2016 (C00578757)**

Falk, Carl O.	3/24/15	\$2,700.00	P2016
Falk, Carl O.	9/29/15	\$2,700.00	P2016
Falk, Marcia G.	3/24/15	\$2,700.00	P2016
Falk, Marcia G.	9/29/15	\$2,700.00	P2016
Ford, Scott T.	2/24/15	\$2,600.00	P2016
Ford, Scott T.	2/24/15	\$2,600.00	P2016
Ford, Scott T.	9/25/15	\$2,700.00	P2016
Frazier-Melton, Anne Ms.	5/1/15	\$1,500.00	P2016
Frazier-Melton, Anne Ms.	6/25/15	\$2,700.00	P2016
Frazier-Melton, Anne Ms.	6/25/15	-\$2,700.00	P2016
Frazier-Melton, Anne Ms.	6/29/15	\$1,300.00	P2016
Frazier-Melton, Anne Ms.	7/7/15	\$1,500.00	P2016
Melton, Ann Frazier Ms.	9/25/15	\$500.00	P2016
Hoefler, Ashley Ms.	6/25/15	\$2,700.00	P2016
Hoefler, Ashley Ms.	9/30/15	\$2,700.00	P2016
Hoefler, John M.S. Mr.	2/5/15	\$2,600.00	P2016
Hoefler, John M.S. Mr.	6/25/15	\$100.00	P2016
Hoefler, John M.S. Mr.	9/30/15	\$100.00	P2016
Hoelscher, Jerome F. Mr.	5/1/15	\$1,000.00	P2016
Hoelscher, Jerome F. Mr.	6/24/15	\$800.00	P2016
Hoelscher, Jerome F. Mr.	8/5/15	\$900.00	P2016
Hoelscher, Jerome F. Mr.	9/24/15	\$100.00	P2016
Holland, Roger L. Mr.	6/25/15	\$2,500.00	P2016
Holland, Roger L. Mr.	9/24/15	\$1,000.00	P2016
Jostrom, Eric H.	2/19/15	\$1,000.00	P2016
Jostrom, Eric H. Mr.	8/10/15	\$2,700.00	P2016
Kissinger, Wes A.	2/24/15	\$3,400.00	P2016
Kissinger, Wes	3/12/15	-\$700.00	
Kissinger, Wes A. Mr.	9/8/15	\$1,500.00	P2016
Knight, Robert A. Mr.	6/10/15	\$2,700.00	P2016

Excessive, Prohibited, and Impermissible Contributions
Lindsey Graham 2016 (C00578757)

Knight, Robert A. Mr.	8/17/15	\$1,000.00	P2016
Knott, David M. Mr.	6/11/15	\$1,000.00	P2016
Knott, David M. Mr.	7/7/15	\$2,000.00	P2016
Knott, David M. Mr.	7/7/15	\$1,000.00	P2016
Knott, David M. Mr.	7/24/15	\$2,000.00	P2016
Knott, David M. Mr.	9/1/15	-\$1,400.00	P2016
Knott, David M. Mr.	9/1/15	-\$300.00	P2016
Knott, David M. Mr.	9/1/15	-\$1,000.00	P2016
Legrand, Ann Swing Ms.	8/26/15	\$5,400.00	P2016
Legrand, Wesley T. Ms.	8/26/15	\$4,400.00	P2016
Norwood, Timothy	8/19/15	\$1,000.00	P2016
Norwood, Timothy	9/25/15	\$2,700.00	P2016
Norwood, Timothy	9/30/15	\$2,700.00	P2016
Posek, David J.	3/18/15	\$2,700.00	P2016
Posek, David Mr.	8/31/15	\$1,000.00	P2016
Posek, David Mr.	9/28/15	-\$1,000.00	P2016
Posek, David Mr.	9/30/15	\$1,700.00	P2016
Rudy, Richard	7/13/15	\$5,400.00	P2016
Snowden, Nancy Ms.	9/24/15	\$5,400.00	P2016
Steinhardt, Judy	9/30/15	\$2,800.00	P2016
Steinhardt, Michael H.	9/30/15	\$2,800.00	P2016
Stephens, Warren A.	2/19/15	\$2,700.00	P2016
Stephens, Warren A. Mr.	8/17/15	\$2,700.00	P2016
Thompson, Toni Mrs.	8/26/15	\$3,000.00	P2016
Thompson, Toni Mrs.	8/26/15	\$2,800.00	P2016
Thompson, Toni Mrs.	9/22/15	-\$200.00	P2016
Timmons, William R.	2/5/15	\$2,600.00	P2016
Timmons, William R. Mr. III	8/17/15	\$1,000.00	P2016

**Excessive, Prohibited, and Impermissible Contributions
Lindsey Graham 2016 (C00578757)**

Tirosh, Gal	3/5/15	\$2,700.00	P2016
Tirosh, Gal	9/30/15	\$2,700.00	P2016
Webster, William M. Mr. IV	9/8/15	\$5,400.00	P2016
White, Karen M.	2/5/15	\$2,600.00	P2016
White, Karen M.	9/8/15	\$2,700.00	P2016
White, Karen M.	9/8/15	-\$100.00	P2016
White, Karen M.	9/8/15	\$2,800.00	P2016
Whittle, Mack I. Jr.	2/5/15	\$2,600.00	P2016
Whittle, Mack I. Mr. Jr.	8/17/15	\$2,700.00	P2016
Wilkins, Susan C.	2/5/15	\$2,600.00	P2016
Wilkins, Susan C. Ms.	9/30/15	\$2,700.00	P2016