



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 11, 2015

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

Response Due Date

09/15/2015

IDENTIFICATION NUMBER: C00578757

REFERENCE: JULY QUARTERLY REPORT (04/01/2015 - 06/30/2015)

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. Your report discloses activity outside the stated coverage dates. The beginning coverage date of the report should be adjusted to include activity that occurred during the testing-the-waters phase. Please amend this report so that the report coverage dates reflect all activity disclosed in the report. (52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)) and 11 CFR § 104.3)
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 all 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 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))

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

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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 Individuals

Contributor Name	Date	Amount	Election
Benet, Lincoln	6/23/15	\$5,400.00	P2016
Benet, Patricia	6/23/15	\$5,400.00	P2016
Bethea, Paula Harper	4/10/15	\$1,108.85	P2016
Bethea, Paula Harper	4/10/15	\$1,108.85	P2016
Bethea, Paula Harper	5/28/15	\$1,500.00	P2016
Blavatnik, Alex	6/22/15	\$5,400.00	P2016
Blavatnik, Larisa	6/22/15	\$5,400.00	P2016
Blavatnik, Olga	6/22/15	\$5,400.00	P2016
Braasch, Dennis M. Mr.	2/10/15	\$2,600.00	P2016
Braasch, Dennis M. Mr.	6/25/15	\$1,800.00	P2016
Braasch, Dennis M. Mr.	6/26/15	\$1,000.00	P2016
Brown, Douglas G. Mr.	3/27/15	\$2,700.00	P2016
Brown, Douglas G. Mr.	6/25/15	\$2,700.00	P2016
Brown, Terry S.	2/5/15	\$2,600.00	P2016
Brown, Terry S.	3/17/15	\$2,600.00	P2016
Buntrock, Dean L. Mr.	6/30/15	\$5,400.00	P2016
Buntrock, Rosemarie Mrs.	6/30/15	\$5,400.00	P2016
Dalton, Charles E. Mr.	2/5/15	\$2,600.00	P2016
Dalton, Charles E. Mr.	6/25/15	\$1,000.00	P2016
Daniel, E. Bart	2/24/15	\$2,600.00	P2016
Daniel, E. Bart	4/10/15	\$2,600.00	P2016
Drew, Dennis E. Mr.	3/3/15	\$2,600.00	P2016
Drew, Dennis E. Mr.	6/26/15	\$2,700.00	P2016
Eudy, Carla	3/24/15	\$2,700.00	P2016

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

Eudy, Carla	6/24/15	\$2,700.00	P2016
Fayssoux, James W. Jr.	2/10/15	\$2,600.00	P2016
Fayssoux, James W. Jr.	3/27/15	\$1,000.00	P2016
Fleishman, Barry	6/4/15	\$2,700.00	P2016
Fleishman, Barry	6/12/15	\$500.00	P2016
Ford, Scott T.	2/24/15	\$2,600.00	P2016
Ford, Scott T.	2/24/15	\$2,600.00	P2016
Frank, Richard H. Mr.	6/25/15	\$2,700.00	P2016
Frank, Richard H. Mr.	6/30/15	\$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
Glueck, Kenneth	6/28/15	\$5,400.00	P2016
Hackman, Michael Mr.	3/3/15	\$2,700.00	P2016
Hackman, Michael Mr.	6/10/15	\$2,700.00	P2016
Hammer, Alvin Mr.	6/25/15	\$5,000.00	P2016
Harmon, Gerald E. Dr.	4/16/15	\$5,400.00	P2016
Heller, Ben	3/27/15	\$2,700.00	P2016
Heller, Ben	6/30/15	\$4,050.00	P2016
Heller, Beth Mrs.	6/30/15	\$4,050.00	P2016
Hertog, Roger	2/26/15	\$2,500.00	P2016
Hertog, Roger	6/30/15	\$5,400.00	P2016
Hertog, Roger	6/30/15	-\$2,700.00	P2016
Hertog, Susan	2/26/15	\$2,500.00	P2016
Hertog, Susan	6/30/15	\$4,600.00	P2016
Hertog, Susan	6/30/15	-\$1,900.00	P2016

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

Jauhari, Sam	3/3/15	\$2,700.00	P2016
Jauhari, Sam	4/16/15	\$50.00	P2016
Kehl, William W. Mr.	2/5/15	\$2,600.00	P2016
Kehl, William W. Mr.	4/16/15	\$250.00	P2016
Kehl, William W. Mr.	5/8/15	\$250.00	P2016
Kehl, William W. Mr.	5/8/15	-\$250.00	P2016
Kehl, William W. Mr.	5/28/15	\$250.00	P2016
Kehl, William W. Mr.	6/9/15	\$1,000.00	P2016
Kehl, William W. Mr.	6/9/15	-\$1,000.00	P2016
Kehl, William W. Mr.	6/25/15	\$1,300.00	P2016
Kehl, William W. Mr.	6/25/15	-\$1,300.00	P2016
Klepper, Kenny	2/10/15	\$1,000.00	P2016
Klepper, Kenny	3/24/15	\$1,000.00	P2016
Klepper, Kenny	4/16/15	\$1,000.00	P2016
Klepper, Kenny	6/11/15	\$1,250.00	P2016
Leffell, Michael J.	3/3/15	\$2,000.00	P2016
Leffell, Michael J.	6/11/15	\$2,500.00	P2016
Legrand, Stuart H. Mr.	4/24/15	\$2,700.00	P2016
Legrand, Stuart H. Mr.	6/25/15	\$2,700.00	P2016
Lehman, John F.	4/10/15	\$2,700.00	P2016
Lehman, John F.	6/15/15	\$100.00	P2016
Likovich, John	6/27/15	\$5,000.00	P2016
Lucas, Donald L. Mr.	4/16/15	\$1,000.00	P2016
Lucas, Donald L. Mr.	6/29/15	\$2,700.00	P2016
Matityahu, Charlotte H. Mrs.	6/30/15	\$8,100.00	P2016
Mckissick, E. Smyth Mr. III	3/3/15	\$2,600.00	P2016
Mckissick, E. Smyth Mr. III	6/30/15	\$2,800.00	P2016
Mckissick, Martha W. Ms.	3/3/15	\$2,600.00	P2016
Mckissick, Martha W. Ms.	6/29/15	\$2,800.00	P2016
McClean, Jodie W.	2/10/15	\$5,200.00	P2016

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

Mizel, Larry A.	6/25/15	\$5,400.00	P2016
Moorhead, Robert C. Mr.	5/1/15	\$1,000.00	P2016
Moorhead, Robert C. Mr.	5/1/15	\$500.00	P2016
Moorhead, Robert C. Mr.	6/10/15	\$500.00	P2016
Moorhead, Robert C. Mr.	6/10/15	\$500.00	P2016
Moorhead, Robert C. Mr.	6/10/15	\$1,000.00	P2016
Paul, Laurence E. Dr.	3/12/15	\$1,392.00	P2016
Paul, Laurence E. Dr.	5/8/15	\$1,308.00	P2016
Paul, Laurence E. Dr.	6/26/15	\$2,700.00	P2016
Pennock, Paul J.	6/11/15	\$4,600.00	P2016
Reaud, Lauren S.	3/27/15	\$2,700.00	P2016
Reaud, Lauren S.	6/29/15	\$2,700.00	P2016
Reaud, Reagan	3/27/15	\$2,700.00	P2016
Reaud, Reagan	6/29/15	\$2,700.00	P2016
Riordan, Michael C. Mr.	2/5/15	\$2,600.00	P2016
Riordan, Michael C. Mr.	6/25/15	\$2,700.00	P2016
Risch, Frank A. Mr.	3/3/15	\$2,700.00	P2016
Risch, Frank A. Mr.	6/15/15	\$2,351.00	P2016
Russ, Michael C. Mr.	6/30/15	\$5,400.00	P2016
Schile, Clay	6/24/15	\$5,400.00	P2016
Schwarz, Donald	5/11/15	\$2,700.00	P2016
Schwarz, Donald	6/30/15	\$1,000.00	P2016
Segall, Gregory	6/12/15	\$5,400.00	P2016
Shepard, Michael	5/8/15	\$1,000.00	P2016
Shepard, Michael	6/28/15	\$2,700.00	P2016
Shultz, George P. Mr.	6/19/15	\$2,700.00	P2016
Shultz, George P. Mr.	6/30/15	\$2,700.00	P2016

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

Simms, Joshua	6/2/15	\$5,400.00	P2016
Smith, Blake	3/3/15	\$1,000.00	P2016
Smith, Blake	6/3/15	\$2,500.00	P2016
Suggs, Thomas E. Mr.	3/3/15	\$2,600.00	P2016
Suggs, Thomas E. Mr.	6/30/15	\$500.00	P2016
Taylor, Joe E Mr. Jr.	2/5/15	\$2,600.00	P2016
Taylor, Joe E. Mr. Jr.	6/30/15	\$5,600.00	P2016
Vallarino, Emily	3/3/15	\$2,700.00	P2016
Vallarino, Emily	6/26/15	\$2,700.00	P2016
Vallarino, Manuel R.	3/3/15	\$2,700.00	P2016
Vallarino, Manuel R.	6/26/15	\$2,700.00	P2016
Wilkins, David H. Mr.	2/5/15	\$2,600.00	P2016
Wilkins, David H. Mr.	6/30/15	\$2,700.00	P2016
Winthrop, John Mr.	2/24/15	\$1,000.00	P2016
Winthrop, John Mr.	5/1/15	\$10.00	P2016
Winthrop, John Mr.	6/9/15	\$1,000.00	P2016
Winthrop, John Mr.	6/24/15	\$1,000.00	P2016