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August 15, 2002

VIA HAND DELIVERY

Ms. Jane Parks, Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC

Re: Graham South Carolina Victory Committee, Inc.
FEC ID #C00378257

Dear Ms. Parks:

This firm serves as counsel to the Graham South Carolina Victory Committee, Inc. ("Victory Committee"). My client received a letter from your office dated July 24, 2002 which asked several questions. I was out of town on the day when the Treasurer, Mr. Clarence Davis, first actually received the letter (August 8, 2002). Mr. Davis contacted your office and was advised that a response needed to be forwarded that very day in order to be considered timely filed.

First, it has been my understanding from previous dealings with your office that an additional three (3) days is added to the date of such a letter as the *starting* point for calculating the fifteen day response period. My understanding was that this three day period was to account for mailing and delivery of the letter to respondents. If this practice has changed and *no* time is now allowed for the mailing and delivery of a letter from your office, please notify me as that is different from the previous standard practice with which I am familiar.

In any event, my assistant in this office worked with Mr. Davis and a response was prepared and mailed to your office via certified mail, on August 8, 2002 in order not to be tardy in responding. You may recall speaking with Ms. Madelynn Lane from my firm about the questions contained in your letter – and you are no doubt aware that my client did in fact submit a response on that date.

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CLIENT/MATTER NUMBER
064545-0102

002.876927.1

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Ms. Jane Parks, Reports Analyst
August 15, 2002
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The purpose of this letter is to correct several factual errors which are contained in your letter of July 24, 2002 in order that the public record does not reflect erroneous information.

1. Graham South Carolina Victory Committee, Inc. filed with the FEC a Statement of Organization as a separate reporting committee and a *joint fundraising representative* of Graham for Senate and the South Carolina Republican Party, as the joint fundraising participants. A copy of the Statement of Organization, file-stamped and dated as received by the Commission on June 5, 2002, is attached.

2. On June 12, 2002, Graham for Senate filed its amended Statement of Organization to indicate the additional depository account of the Graham for Senate Committee and to notify the Commission of the appointment of a joint fundraising representative.

3. On June 12, 2002, Lindsey Graham filed his amended Statement of Candidacy to authorize the Graham South Carolina Victory Committee, Inc to act as a joint fundraising representative on his behalf.

4. The Statement of Organization for the Graham South Carolina Victory Committee, Inc. provides on page 2, #8 that the Graham for Senate Committee is a joint fundraising participant of the Graham South Carolina Victory Committee, Inc. and it specifically states as follows: *See attachment for additional joint fundraising participant*. The only attachment to the Statement of Organization contains the name and address of the South Carolina Republican Party.

It is our belief that my client was, prior to your letter, in full compliance with the Commission's filing and documentation requirements as well as the Commission's regulations at 11 C.F.R. §102.17. I am not clear as to why my client received this letter in the first place.

Also, it is my understanding from my assistant that you advised her *not* to indicate on the front page of this filing the existing FEC ID # of the Graham South Carolina Victory Committee, Inc. and *not* to check the box indicating that the filing on August 8, 2002 was an amendment. Thus, the box is checked 'new' and there is no FEC ID# listed on the filing of that date. I do *not* think this is correct manner in which to proceed, but my assistant stated that it was prepared that way at your instruction.

I am concerned that your July 24, 2002 letter contains incorrect information and further, I am concerned that the document prepared and filed on August 8, 2002, in response to your letter and instructions may create future confusion if not properly listed as an amendment to an earlier filing. I do not want a *new* Graham South Carolina Victory Committee, Inc. to be established as a result of that response letter, with a separate FEC ID #.

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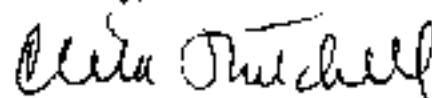
Ms. Jane Parks, Reports Analyst
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Please take whatever steps are necessary to be certain that only one Graham South Carolina Victory Committee, Inc. is listed with the Commission. We would also appreciate it if you would please correct your records as indicated above to note that there was/is no improper use of a candidate's name – and, further, that the original filing did in fact specify that the South Carolina Republican Party was/is a joint fundraising participant in the Graham South Carolina Victory Committee, Inc.

Please contact me at (202) 295-8041 if you have any further questions regarding this matter.

Thank you in advance for your prompt attention to this matter and your assistance in making sure the files/records are corrected.

Sincerely,



Clea Mitchell
Foley & Lardner

Attachments

cc: Mr. Clarence Davis, Treasurer
Ms. Denise Bauld
Mr. Ed Matricardi, Treasurer, South Carolina Republican Party

2002 JUN - SEN A ID 22

FEC
FORM 1

STATEMENT OF ORGANIZATION

(See instructions)

Office Use Only

1. NAME OF COMMITTEE (In full) (Check if name is changed) Example: If typing, type over the lines. 12PB4MS

Graham South Carolina Victory Committee

ADDRESS (number and street) P O Box 11579

(Check if address is changed) Columbia SC 29211

CITY STATE ZIP CODE

COMMITTEE'S E-MAIL ADDRESS

COMMITTEE'S WEB PAGE ADDRESS (URL)

2. DATE 05 24 2002

3. FEC IDENTIFICATION NUMBER C

4. IS THIS STATEMENT NEW (N) OR AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Clarence Davis

Signature of Treasurer *Clarence Davis* Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

SECRETARY OF THE SENATE
02 AUG 09 AM 10:33

5. TYPE OF COMMITTEE (Check One)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate _____

Candidate Party Affiliation Office Sought House Senate President State District

- (c) This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate _____

(d) This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

(e) This committee is a separate segregated fund.

(f) This committee supports/opposes more than one federal candidate, and is NOT a separate segregated fund or party committee.

6. Name of Any Connected Organization or Affiliated Committee (See attachment for additional joint fundraising participant)

Lindsay Graham for Senate _____

Mailing Address P.O. Box 1155 _____

337 Biv. Place 123 _____

Seeger, S.C. 29679 _____

CITY ▲

STATE ▲

ZIP CODE ▲

Relationship Joint Fundraising Participant _____

Type of Connected Organization:

- Corporation Corporation w/ Capital Stock Labor Organization
- Membership Organization Trade Association Cooperative

Write or Type Committee Name

Graham South Carolina Victory Committee, Inc.

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name | A | l | l | e | n | , | H | a | r | v | e | y | , | W | o | o | d |

Mailing Address | 3 | 9 | 0 | 1 | , | B | a | r | k | e | t | t | , | D | r |

| S | u | i | t | e | , | 2 | 0 | 5 |

| R | a | l | e | i | g | h | | N | C | | 2 | 7 | 6 | 0 | 9 | - |

Title or Position | CITY | STATE | ZIP CODE

| A | s | s | i | s | t | a | n | t | T | r | e | a | s | u | r | e | r | Telephone number | 9 | 1 | 9 | - | 5 | 7 | 1 | - | 8 | 7 | 7 | 3 |

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer | C | l | e | r | e | n | c | e | , | D | a | v | i | B |

Mailing Address | 1 | 3 | 3 | 9 | , | L | a | d | y | , | S | t | r | e | e | t |

| K | e | e | n | a | n | B | u | i | l | d | i | n | g | , | T | h | i | r | d | F | l | o | o | r |

| C | o | l | u | m | b | i | a | | S | C | | 2 | 9 | 2 | 0 | 1 | - |

Title or Position | CITY | STATE | ZIP CODE

| T | r | e | a | s | u | r | e | r | Telephone number | 8 | 0 | 3 | - | 2 | 5 | 5 | - | 9 | 5 | 8 | 3 |

Full Name of Designated Agent | A | l | l | e | n | , | H | e | y | W | o | o | d |

Mailing Address | P | O | B | o | x | , | 1 | 7 | 9 | 2 | 6 |

| R | a | l | e | i | g | h | | N | C | | 2 | 7 | 6 | 0 | 9 | - | 2 | 9 | 2 | 0 | 1 |

Title or Position | CITY | STATE | ZIP CODE

| A | s | s | i | s | t | a | n | t | T | r | e | a | s | u | r | e | r | Telephone number | 9 | 1 | 9 | - | 5 | 7 | 1 | - | 8 | 7 | 7 | 3 |

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Bank of America

Mailing Address

1301 Gervais Street

Columbia SC 29201

CITY ▲

STATE ▲

ZIP CODE ▲

Name of Bank, Depository, etc.

Mailing Address

CITY ▲

STATE ▲

ZIP CODE ▲

**Statement of Organization
Attachment**

South Carolina Republican Party
1508 Lady Street
P.O. Box 21765
Columbia, SC 29201

