

MISCELLANEOUS TEXT (FEC Form 99)

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NAME OF COMMITTEE (In Full)
TEAM GRAHAM, INC.FEC IDENTIFICATION NUMBER
C00458828

Mailing Address PO BOX 1801

City	State	ZIP Code
COLUMBIA	SC	29202-1801

June 14, 2021

Jessica Grainger
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

RE: Letter inquiring about Amended 2020 October Quarterly Report (07/1/2020 - 09/30/2020) Received 12/09/2020

Dear Ms. Grainger:

Thank you for your correspondence of May 10, 2021. Below are answers to your request for additional information:

1. All contributions that exceeded the limits, with one exception listed below, have been refunded. These refunds were either reported on the Amended Post-General 2020 Report, the April Quarterly 2021 Report, or will be reported on the upcoming July Quarterly 2021 Report.

There were several contribution refunds on the Amended Post-General 2020 report that were mistakenly reported as general operating expenditures on Line 17 of Schedule B. These contribution refunds have been corrected and are now reported on Line 20a on the newest amendment. There were also several contribution refunds mistakenly marked as disbursements for the 2026 Primary election period on the Amended Post-General 2020 report. These contribution refunds have been changed to reflect the correct election period of 2020 General.

According to our records, the Cardinal Health Inc. PAC is not over the contribution limit. The contribution on 3/30/2019 was designated by the donor for the 2020 Primary election, but it was mistakenly reported as a donation for the 2020 General election. The entry for this contribution on Schedule A of the April Quarterly 2019 report has been amended to show the correct period.

2. Our committee routinely contacts all donors who have a foreign address to request a copy of their U.S. passport to confirm their citizenship status. The committee has confirmed that Frederic Ryan Spengeman is an American citizen.

3. Our committee routinely confirms that all limited liability companies that contribute to our campaign are taxed either as a sole proprietorship or a partnership. We confirmed that the LLC in you inquired about, Winning Spirit LLC, is taxed as a partnership. We have amended the report to provide the information about the partners for this contribution.

4. You inquired about a donation from James River Coal Kentucky PAC, which is not a political committee registered with the Commission. This contribution was refunded on 11/23/2020 and itemized on the amended Post-General 2020 Report, although it was mistakenly reported as a general operating expenditure on Line 17. This entry has been corrected so that the refund appears on Line 20 of the latest amendment of the report.

5. The totals listed on lines 6(a), 6(c), 11(a)(i), 11(a)(ii), 11(a)(iii), 11(c), 11(e), 12 and 16 Column B of the Summary and Detailed Summary Pages were incorrect. We discovered duplicate records in our database that have been merged, so all reports going back to the July Quarterly Report 2017 have been amended to correct the Detailed Summary Pages and Schedule A where the contributions, in some cases, were itemized.

We appreciate this opportunity to ensure the correct information is included in the public record. If you have any questions or need any additional information, please contact me at (803) 748-0300.

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Sincerely,

Thad H. Westbrook
Treasurer