

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)

Team Graham, Inc

FEC IDENTIFICATION NUMBER

C00458828

Mailing Address PO Box 1801

City

Columbia

State

SC

ZIP Code

29202-1801

January 11, 2023

Ms. Jessica Grainger

Sr. Campaign Finance Reviewing Analyst

FEC

Dear Ms. Grainger:

Team Graham is in receipt of your letter dated December 7, 2022 in which you reference the Committee's July 2022 Quarterly Report.

With regard to Best Efforts:

The Committee takes the following steps to ensure compliance with 11 CFR§104.3(a)(4)(i) and 104.7:

All solicitations to prospective donors include the following statement: "Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year."

If the individual fails to respond to the initial request, the Committee sends a stand-alone follow-up letter requesting the same information. The letter includes a pre-addressed, stamped envelope and contains the following statement:

"Federal law requires that we obtain the attached information regarding your occupation and employment. Please complete the attached form and return it to us as soon as possible in the enclosed envelope."

If the individual fails to respond to the Committee's requests, the Committee reports donor information pursuant to the guidelines in 11 CFR 104.7(b)(3) and 11 CFR 104.7(b)(4).

Inasmuch as the regulations require the Committee to ask contributors to supply employer/occupation information (as outlined above) but do not compel the contributors to comply with the Committee's requests, the Committee has reported all the information it has in its possession in an attempt to satisfy both the intent and the substance of 11 CFR 100.12, 11 CFR 104.3, and 11 CFR 104.7. In addition, the Committee can find no guidance in the statute or regulations that allow it to add to or subtract from information that is voluntarily provided to it from its contributors nor is there any indication in the statute or regulations that the descriptions referred to are inadequate listings for employer and/or occupation. Finally, the Committee notes that it will update its employer/occupation data as it is received from donors and makes every effort to secure the requested information from all available sources.

With regard to the donors listed in paragraph 1 of your letter, the Committee believes that each of these donors was subsequently refunded so that they are now in compliance with the contribution limits. However, the Committee continues to review the list (and all of its donors) to ensure full compliance as it undertook a software upgrade/transition. As such, the Committee will file any amendments, as necessary, to correct any donors whose records do not properly reflect their actual status.

Sincerely,

Cabell Hobbs

Treasurer

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