



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**MEMORANDUM**

**TO:** The Commission

**FROM:** Office of the Commission Secretary *LC*

**DATE:** August 28, 2024

**SUBJECT:** AOR 2024-07 (Team Graham)  
Comment on Drafts A and B from  
Holtzman Vogel

The following is an AOR 2024-07 (Team Graham) Comment on Drafts A and B from Holtzman Vogel. This matter will be discussed on the next Open Meeting of August 29, 2024.

**Attachment**

# Holtzman Vogel

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

August 28, 2024

**RECEIVED**

By Office of General Counsel at 12:48 pm, Aug 28, 2024

**VIA E-MAIL**

Federal Election Commission  
Office of General Counsel  
1050 First Street, NE  
Washington, DC 20463

**RECEIVED**

By Office of the Commission Secretary at 1:22 pm, Aug 28, 2024

**Re: Advisory Opinion Request 2024-07**

Dear Commissioners:

We write on behalf of Team Graham, Inc. (“Team Graham”) regarding Drafts A and B released in response to Advisory Opinion Request 2024-07. We appreciate the Commission’s thoughtful consideration of the important issues raised in Team Graham’s request, and write to encourage the Commission to adopt either Draft A or Draft B.

Importantly, both Drafts A and B correctly conclude that Team Graham may participate in the joint fundraising committee as proposed in its request. Both Drafts A and B determine that the proposed joint fundraising committee would be permissible under 52 U.S.C. § 30125(e). And, both Drafts A and B recognize that, as proposed, neither Senator Graham, Team Graham, nor their agents will engage in prohibited coordination. The minor additions contained in Draft B do not meaningfully change the analysis and conclusions found in both Drafts.<sup>1</sup>

Accordingly, we urge the Commission to adopt either Draft A or Draft B. The minor distinctions between Drafts A and B should not prevent the Commission from adopting an advisory opinion recognizing the important conclusions unanimously reached in both Drafts. Thank you for your careful attention to the important issues raised in Team Graham’s request.

Sincerely,



Jessica Furst Johnson  
Andrew D. Watkins  
*Counsel to Team Graham, Inc.*

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<sup>1</sup> Draft B contains an additional sentence on page 8 recognizing that Team Graham’s request, as proposed, will “fully comply with 11 C.F.R. § 102.17, including that Super PAC will not ‘advance any funds to pay joint fundraising costs,’ and notes, in footnote 26, that the NRSC submitted a comment in response to Team Graham’s request “which represents that it will similarly not coordinate communications with Super PAC other than the joint fundraising solicitations.”