



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 4, 2021

MS. JENNIFER B. MURPHY, TREASURER  
NATIONAL ASSOCIATION OF HEALTH  
UNDERWRITERS PAC (HUPAC)  
1212 NEW YORK AVE NW SUITE 1100  
WASHINGTON, DC 20005

**Response Due Date**  
**04/08/2021**

IDENTIFICATION NUMBER: C00283135

REFERENCE: YEAR-END REPORT (11/24/2020 - 12/31/2020)

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. Schedule B supporting Line 23 discloses one or more contributions to a candidate(s) for the 2020 General election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action promptly by providing

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the date and method of your remedy (refund or redesignation request) for each contribution. The committee should retain for its records copies of the refund and/or redesignation request(s) sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

2. Schedule B of your report discloses one or more contributions to "Jerry Carl For Congress," "Lisa McClain For Congress," and "Peter Meijer For Congress" for the retirement of debts incurred by the 2020 General election campaign; however, it appears that the recipient committee(s) had insufficient debts to warrant such a contribution. Please note that a committee may only designate contributions to retire a candidate's debts if those debts exist. (11 CFR §§ 110.1(b) and 110.2(b))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund or redesignation request) for each contribution. The committee should retain for its records copies of the refund and/or redesignation request(s) sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b)).

Although the Commission may take further legal action regarding this

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impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

- For your information and consideration for future filings, Schedule B supporting Line 23 of your report discloses a contribution(s) to "Catherine Cortez Masto For Senate" and "Wyden For Senate" designated for "General 2020." However, it appears this candidate(s) did not participate in the election(s) indicated. Contributions not designated for a valid election will be attributed to the next election for Federal office in which the candidate is participating. (11 CFR §§ 110.1(b)(2) and 110.2(b)(2)) For future filings, please include valid election designation(s) if applicable.

**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. For information about the report review process or specific filing information for your committee type, please visit [www.fec.gov/help-candidates-and-committees](http://www.fec.gov/help-candidates-and-committees). For more information about Requests for Additional Information (RAI), why you received a letter, and how to respond, please visit [www.fec.gov/help-candidates-and-committees/request-additional-information](http://www.fec.gov/help-candidates-and-committees/request-additional-information). Should you 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) 694-1294.

Sincerely,



Jamie Timmie

Senior Campaign Finance Analyst

**Apparent Impermissible, Excessive, and Prohibited Contributions****NATIONAL ASSOCIATION OF HEALTH UNDERWRITERS PAC (HUPAC) (C00283135)****Apparent Contributions Made After Election Date**

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Election Date</b>
Michelle Steel For Congress	12/15/20	\$1,000.00	G2020	11/3/20
Zeldin For Congress	12/15/20	\$1,000.00	G2020	11/3/20