



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

RQ-2

July 4, 2024

BRADY KELLEY, TREASURER  
WHOLESALE & SPECIALTY INSURANCE ASSOCIATION (WSIA) PAC  
1500 K ST NW SUITE 1100  
WASHINGTON, DC 20005

**Response Due Date**  
**08/08/2024**

IDENTIFICATION NUMBER: C00417634

REFERENCE: YEAR-END REPORT (07/01/2023 - 12/31/2023)

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 1 item(s):

- Schedule B supporting Line 29 of the Detailed Summary Page discloses a disbursement(s) for "Non-federal contribution" totaling \$5,000 to "Tim Temple for Louisiana" dated 10/31/23. This transaction(s) appears to be related to an apparent unauthorized disbursement of Committee funds. The Commission notes the memo text disclosed on your Form 99, received 1/31/24 stating:

"The Wholesale & Specialty Insurance Association PAC (the Committee) hereby submits this miscellaneous report to clarify that a contribution issued by the Committee was stolen. The Committee worked promptly with law enforcement and the perpetrator is now under arrest. The funds have been refunded to the Committee, and the Committee has reissued the underlying intended contribution, with no other impact on the Committee's reported cash on hand, as detailed more below.

In October of 2023, the Committee issued a check for \$5,000 (check number 1406) to be paid as a contribution to the campaign committee of Tim Temple. On November 8, 2023, check 1406 was processed and withdrawn from the Committee's depository bank account. Internal review pursuant to the Committee's internal controls revealed that the check image showed the payee information was altered. The Committee submitted an affidavit to its bank (PNC Bank) to alert them to the fraudulent activity.

Also, a second purported check (which purported to be check number 1418) was

## WHOLESALE &amp; SPECIALTY INSURANCE ASSOCIATION (WSIA) PAC

Page 2 of 3

also processed on November 8, 2023. The check image and the Committee's records revealed that it was not actually check number 1418 (which was later issued a contribution to the campaign committee of Colleen Burton), and the purported check had been altered completely to purport to be check 1418. This was one of several alterations, including date, payee, amount, and memo section, and insertion of "447-6401-007?". None of these alterations reconciled to any information in the Committee's records. Unlike check 1406, PNC Bank flagged check 1418 as fraudulent immediately and the funds were returned the next day.

The Committee promptly alerted local law enforcement, who promptly arrested the perpetrators. The \$5,000 converted from check 1406 was refunded to the Committee on January 18, 2024. The Committee re-issued a contribution check for \$5,000 to the campaign committee of Tim Temple on December 5, 2023, which was properly deposited on January 18, 2024. The Committee maintains internal controls that meet FEC regulations regarding the internal controls safe harbor. It credits those internal controls for its prompt discovery of this theft, and the Committee's swift coordination with law enforcement to catch the perpetrators."

Although the Commission may take further legal action regarding this apparent improper use of Committee funds, any further clarifying information that you can provide will be taken into consideration. (11 CFR § 102.9, 102.15, and 104.3)

**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 (RFAI), 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

WHOLESALE & SPECIALTY INSURANCE ASSOCIATION (WSIA) PAC

Page 3 of 3

press 5 to reach the Reports Analysis Division) or my local number(202) 694-1289.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Moore", is centered within a light blue rectangular background.

Joshua Moore

Campaign Finance Analyst

356