

**Congress of the United States**  
**Washington, DC 20515**

May 9, 2018

Lisa J. Stevenson, Acting General Counsel  
Office of the General Counsel  
Federal Election Commission  
1050 First Street NE  
Washington, DC 20463

**Re: Advisory Opinion Request 2018-06 (Shirley)**

Dear Ms. Stevenson,

We write in support of the request of Liuba Grechen Shirley and her campaign committee to allow campaign funds to be used for campaign-related childcare expenses so that she may engage in campaign activities in her run for Congress. For a parent to seek federal office and participate in requisite campaign events and travel, childcare is a necessary expense and should not constitute a “personal use” of campaign funds under 11 C.F.R. 113.1(g).

The Commission decided a similar question in AO 1995-42 (McCrery), in which the Commission allowed a candidate to pay for childcare expenses with campaign funds because “childcare expenses [were] incurred only as a direct result of campaign activity and would not otherwise exist.”<sup>1</sup>

During an election cycle in which a record number of women are running for office, the Commission’s opinion on the use of campaign funds to pay for campaign-related childcare expenses will have nationwide ramifications.<sup>2</sup> Women and working parents face many barriers in running for public office, including meeting childcare obligations during campaigns that require frequent travel and evening and weekend events. As we work to build a political environment that is fair to candidates of all backgrounds, the Commission has a role to play in fairly enforcing and administering federal campaign finance laws.

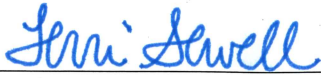
In the case of Ms. Shirley and others like her, we urge the Commission to recognize childcare as a necessary campaign-related expense which may be paid for with campaign funds. While the original 10-day comment period on AOR 2018-06 expired on April 16, 2018, we urge you to accept this comment given the time required to develop and submit thoughtful input and the weight of the FEC’s decision on this matter.

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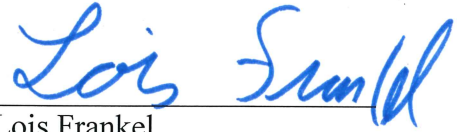
<sup>1</sup> See FEC Adv. Op. 1995-42 (McCrery)

<sup>2</sup> See Danielle Kurtzleben, More Than Twice As Many Women Are Running for Congress in 2018 Compared with 2016, NPR (Feb. 20, 2018), available at <https://www.npr.org/2018/02/20/585542531/more-than-twice-as-many-women-are-running-for-congress-in-2018-compared-to-2016>

Sincerely,



Terri A. Sewell  
Member of Congress



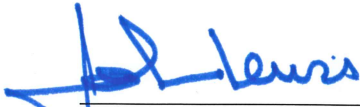
Lois Frankel  
Member of Congress



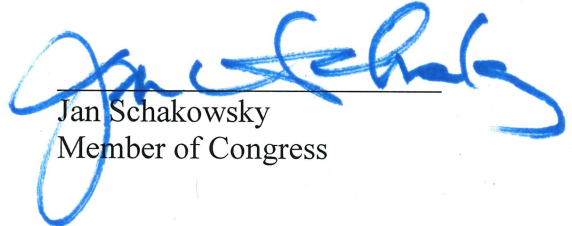
Brenda Lawrence  
Member of Congress



Carolyn B. Maloney  
Member of Congress



John Lewis  
Member of Congress



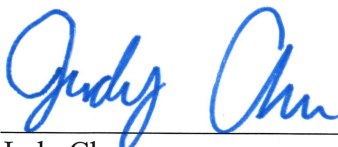
Jan Schakowsky  
Member of Congress



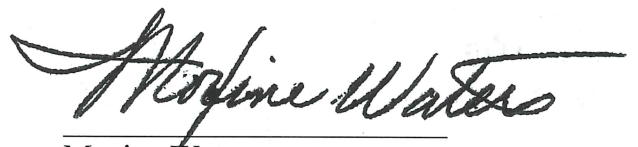
Barbara Lee  
Member of Congress



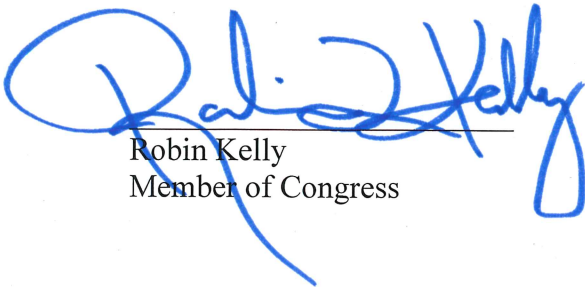
Robert A. Brady  
Member of Congress



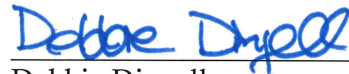
Judy Chu  
Member of Congress



Maxine Waters  
Member of Congress



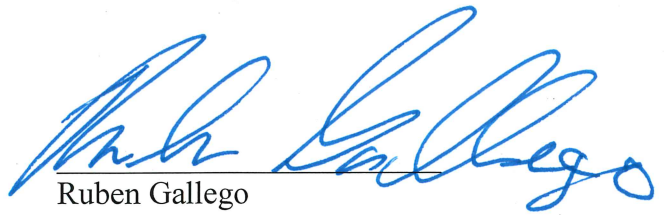
Robin Kelly  
Member of Congress



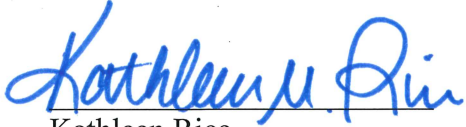
Debbie Dingell  
Member of Congress



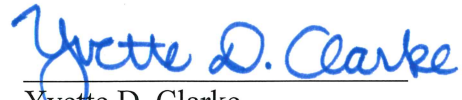
Dina Titus  
Member of Congress



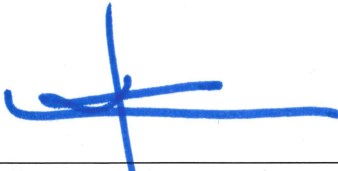
Ruben Gallego  
Member of Congress



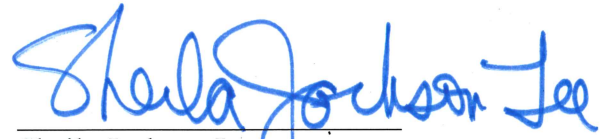
Kathleen Rice  
Member of Congress



Yvette D. Clarke  
Member of Congress



Colleen Hanabusa  
Member of Congress



Sheila Jackson Lee  
Member of Congress



Donald McEachin  
Member of Congress



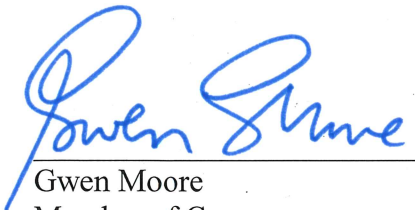
Bonnie Watson Coleman  
Member of Congress




Frederica S. Wilson  
Member of Congress



Jamie Raskin  
Member of Congress



Gwen Moore  
Member of Congress



Ted Deutch  
Member of Congress