



My name is Liuba Grechen Shirley. I am a former Congressional Candidate and Founder and CEO of Vote Mama.

Thank you for including my testimony for the record and for considering the proposed rule change to amend the regulatory definition of personal use to clarify that campaign funds may be spent on certain security measures. This rule change would explicitly allow all federal candidates and officeholders to use campaign funds to pay for security expenses directly related to ongoing dangers that would not exist irrespective of the individual's status or duties as a federal candidate or officeholder.

**[Vote Mama Foundation](#) is working to break the institutional barriers parents face while running for and serving in office. We provide federal, state, and local legislators and stakeholders with the tools they need to pass truly family-friendly legislation.** We need more women, mothers, and diverse voices in office, and a crucial part of building a more representative democracy is ensuring candidates have the resources to navigate our political landscape and protect themselves. Using campaign funds to pay for security expenses directly related to campaign activity or carrying out official duties is a concrete step we can take to empower more women and moms to run for office and sustainably stay office once elected.

Violence against women politicians is, unfortunately, a global occurrence. Organizations such as the [National Democracy Institute](#), and the [Inter-Parliamentary Union](#) have documented the disproportionate impact of violence against women in politics while on the campaign trail and while serving in office. Scholar and policy practitioner, Mona Lena Krook, identified key forms of violence that impact women politicians in her 2020 book project *Violence Against Women in Politics*. According to her findings, violence against women in politics is perpetuated in political settings across the world in physical, sexual, semiotic, economic, and psychological ways. These acts of violence can deter women from running for office in the first place, end a campaign before an election, or cause women to leave office entirely for the protection of themselves and their families. These findings hold true for women in politics in the United States. Candidates and officeholders at all levels of government have experienced an increase in death threats, swatting, home invasions, gun violence, cyber attacks, and many other forms of violence. Two of the most notable instances of these extreme acts of violence are the home invasion of then Speaker of the House Nancy Pelosi in California and the attempted assassination of Gabby Giffords during a mass shooting in Texas.

Entering the political arena should never come at the expense of a candidate's physical, emotional, and mental well-being. Unfortunately, women, especially women of color, face persistent harassment, threats, and abuse on the campaign trail that takes a toll on their mental health and can even drive them out of politics altogether. These are voices



that we desperately need at the decision-making table and the persistent acts of violence and terror against them are pushing women out of office and out of power.

Under [federal guidelines](#), candidates for Federal office are allowed to use private campaign funds to pay for home security enhancements, “because the threats and need for security upgrades would not exist irrespective of the officeholders’ candidacy or duties as an officeholder.” The Federal Election Commission furthered its guidance for federal candidates in 2021. As cited in [AO 2021-03](#), federal officeholders can use campaign funds to pay for personal security expenses for the officeholder and their immediate family. The Commission stated the following when issuing the Advisory Opinion:

*“Similar to the need for increased residential security, the need for personal security for officeholders and their immediate family members in the context requested arises due to officeholders’ roles as elected officials. Under these circumstances, the reasonable costs of bona fide, legitimate, professional personal security personnel for officeholders and their immediate family members constitute ordinary and necessary expenses incurred in connection with officeholders’ duties and are a permissible use of campaign funds under the Act and Commission regulations.”*

Candidates and officeholders are in immediate need of a universal ruling from the Federal Election Commission that permits the use of campaign funds to pay for any type of security expense, including non-structural security devices, structural security devices, professional security personnel and services, and cybersecurity software, devices, and services; that are a direct response to threats of violence made to the candidate or the candidate’s immediate family. In 2023 alone, 982 transactions were made on personal security, including transactions made by Sen. Raphael Warnock, Sen. Marco Rubio, Rep. Eric Swalwell, President Donald Trump, Rep. Alexandria Ocasio Cortez, and Rep. Cori Bush. In many instances, families need an immediate security response to a threat or attempt of violence, and they need to know that their expenses are permissible and justified.

States such as [California](#), [Georgia](#), [Massachusetts](#), and [Minnesota](#) have all adopted similar guidelines to the above-referenced Federal Election Commission rulings that allow state and local candidates to use campaign funds on security expenses in direct response to threats of violence against a candidate or officeholder.

I fully support the Commission adding a new paragraph (g)(10) to address the use of campaign funds for security. Within proposed 11 CFR 113.1(g)(10),



I respectfully urge the Commission to include an explicit allowance to permit campaign funds to be used to pay for security measures specifically for staff members of a candidate or officeholder and for security measures for the candidate or officeholder's family, especially dependent children who reside in the candidate or officeholder's home. It is paramount that parents running for office can use campaign funds for professional security personnel or similar services for immediate family members, specifically to cover security measures to protect a dependent child or adult who relies on the candidate or officeholder for full-time caregiving.

Through my work at Vote Mama, I have heard countless stories from mama candidates and legislators about the persistent abuse endured by their families while out on the campaign trail. Threats of violence and harm have become a constant in American politics, disproportionately affecting women candidates and their families. What's worse, is that these candidates have to dip into their savings or max out credit cards to pay for out-of-pocket security expenses that are necessary to keep them and their families safe.

During my own run for federal office in 2018, my family and I endured many instances of violence as a direct result of my candidacy. Someone vandalized my car, smashing my back windshield. I had a man continuously show up to my campaign events to film and intimidate me throughout my run for office. People would even call my daughter's nursery school to harass the caregivers I was paying to watch my child. The constant abuse was incredibly difficult for my entire family, and I want to make sure no other moms have to go through that.

We know this vital resource makes a difference in who can run for office across the country – *regardless of political ideology*. Campaign funds spent on security expenses would be reported just like every other campaign expenditure and held to the same standard of reporting and monitoring. I respectfully urge the Federal Election Commission to adopt the proposed rule change, as outlined in [Notice 2024-09](#), to allow federal candidates and officeholders to use campaign funds to pay for security expenses that are directly related to ongoing dangers that would not exist irrespective of the individual's status or duties as a federal candidate or officeholder.

Thank you for your time and consideration. I welcome the opportunity to provide testimony at a public hearing.

Sincerely,

A handwritten signature in black ink that reads 'Liuba Grechen Shirley'.

Liuba Grechen Shirley  
Amityville, New York