

# HOLTZMAN VOGEL JOSEFIAK TORCHINSKY PLLC

*Attorneys at Law*

45 North Hill Drive • Suite 100 • Warrenton, VA 20186

**RECEIVED**

By Office of General Counsel at 12:00 pm, Jun 17, 2019

June 17, 2019

Lisa J. Stevenson, Esq.  
Acting General Counsel  
Office of General Counsel  
Federal Election Commission  
1050 First Street., N.E.  
Washington, D.C. 20463

**Re: Comment in Support of AOR 2019-13**

Dear Ms. Stevenson:

This comment is submitted by the undersigned counsel on behalf of U.S. Senator John Cornyn and his principal campaign committee, Texans for Senator John Cornyn, Inc.

On June 5, 2019, counsel for Ms. MJ Hegar and her principal campaign committee, MJ for Texas, submitted to your office an advisory opinion request<sup>1</sup> seeking the Commission's determination regarding the lawfulness of Ms. Hegar's plan to use campaign funds to defray certain childcare expenses that would not exist "irrespective of [her] election campaign." 52 U.S.C. § 30114 (b).

We write today to express Senator Cornyn's full support for Ms. Hegar's advisory opinion request. Our client endorses the Commission's previous advisory opinions<sup>2</sup> permitting the use of campaign funds to defray the costs of childcare and urges the Commission to approve Ms. Hegar's request in the same manner.

Upon review of her request, the Commission should expeditiously issue an advisory opinion affirming that Ms. Hegar and other candidates similarly situated may use campaign funds to defray childcare costs that would not exist "irrespective of the candidate's election campaign."

Sincerely,



Jill Vogel  
Jason Torchinsky  
*Counsel to U.S. Senator John Cornyn and Texans  
for Senator John Cornyn, Inc.*

---

<sup>1</sup> AOR 2019-13

<sup>2</sup> See FEC Adv. Op. 1995-42 (McCrery); FEC Adv. Op. 1995-20 (Roemer); FEC Adv. Op. 2005-09 (Dodd); FEC Adv. Op. 2018-06 (Liuba for Congress).