



250 Massachusetts Ave NW, Suite 400 | Washington, DC 20001

July 22, 2024

**BY E-MAIL DELIVERY**

Attn: Robert M. Knop, Assistant General Counsel for Policy  
Federal Election Commission  
1050 First Street NE  
Washington, DC 20463

**Re: REG 2024-01; Use of Campaign Funds for Candidate and Officeholder Security**

Dear Mr. Knop,

We submit the following supplemental comment on behalf of DSCC and DCCC (the “*Parties*”) regarding the Federal Election Commission’s (the “*Commission’s*”) Notice of Proposed Rulemaking 2024-01 on the use of campaign funds for candidate and officeholder security (the “*Proposed Rule*”).

On March 27, 2024, all six Commissioners unanimously approved the Proposed Rule.<sup>1</sup> The notice was published in the Federal Register on April 9, 2024, with comments due by June 10, 2024.<sup>2</sup> In our first public comment on June 10, 2024, we emphasized that political security threats have increased in volume and tenor in recent years. Specifically, at that time, we noted that:

When the Parties work directly to help recruit the next generation of civic leaders, they do not take lightly the ask they are making of these candidates and officeholders to put themselves into the public arena, often at the risk to their own personal safety and that of their family and staff.

In light of the assassination attempt on former President Trump, the Commission should act with haste to adopt regulations to provide guidance to candidates, officeholders and members of their families and staff on how they may permissibly protect themselves against threats of political violence. Protecting candidates, officeholders, and members of their families and staff is essential to a functioning democracy and to encourage public service. **We urge the Commission to adopt a revised final rule as soon as possible.**

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<sup>1</sup> REG 2024-01 (Candidate Security) - Draft Notice of Proposed Rulemaking, Agenda Document No. 24-11-A (March 27, 2024).

<sup>2</sup> Fed. Reg. Vol. 89, No. 69 (Apr. 9, 2024).

Sincerely,



Rachel L. Jacobs  
Zachary P. Morrison  
*Counsel to DSCC and DCCC*