

Setting the Record Straight

Two years ago, I decided to run for office for the first time. I knew that politics could be an ugly business and that my personal story and my professional accomplishments would be questioned. I was OK with that reality, as Congress is not a place for thin skin. But I never expected that a former opponent would allege that the business I worked so hard to build was some kind of elaborate plot to fund my congressional bid.

I believe that if we're going to restore trust in our politics, we need our elected officials to be honest, transparent and fair. While I was hoping that the Federal Election Commission would adjudicate a politically motivated complaint that was lodged against my 2018 campaign, it's clear to me that won't happen any time soon. President Trump has refused to nominate commissioners, and so the FEC has ground to a stand-still.

In the meantime, I want to address some of the confusion that has been created about my business, my income and the issues underlying a campaign finance inquiry.

I will start with my company, Concire, which I co-founded with two smart, successful women – Frances Frei, a Harvard Business School professor, and Anne Morriss, an author and entrepreneur. Like many HBS professors who launch a consultancy, Frances's research and expertise were in demand in boardrooms, off-site meetings and retreats around the globe. We created methodologies that were appealing to companies seeking to change business strategies and cultures.

Some companies sought us out to tackle a specific problem, and those relationships were short and intense, while others kept us on annual retainers so that they could seek guidance as needed. When I took over the business in 2015, I began booking other HBS faculty as speakers and advisors for companies looking for expertise in a broader range of fields.

Because of the sensitivity around the services we provided and the competitive industries of our clients, all of our contracts included confidentiality clauses, which are a standard practice in the consulting world. I never thought that honoring those contracts would give rise to a political allegation that those clients weren't real.

Concire was perfect for this working mom of two little girls because I had flexibility and autonomy. I traveled extensively to where my clients were located, but when I was home, I could structure my own schedule and often work after my children went to bed. While I was campaigning in 2018, I could not spend as much time traveling or developing new business so I focused on managing a handful of long-standing clients, continuing to book engagements (off which I earned a fee), and settling accounts for work already delivered.

Concire allowed me to contribute to my family's finances as well. Through my work, I earned \$361,000 in 2017 and \$274,000 in 2018. Growing up in a working class neighborhood of Lowell, I never imagined earning that kind of income.

When Dave and I got married in 2007, we made a deal. And we actually wrote it down. All of the income that each of us earned would be our marital property, and each of us would have an equal right to manage and spend it. What I earned was *our money* and what he earned was *our money*. We didn't distinguish. In time, we fell into a routine. Certain expenses (e.g. family health care premiums) would be paid from accounts in my name; other expenses (e.g. tuition payments) would be paid from accounts in his name; and a variety of regular household expenses would be paid from joint accounts. That's just the way we did things. It worked well for us, with three boys from Dave's first marriage and the two girls we had together.

When Congresswoman Niki Tsongas announced her retirement in 2017, I jumped at the chance to run for her seat to represent the Third Congressional District – a place where I have lived my whole life. With President Trump in office, one thing was abundantly clear: we needed more women at the table in Washington, setting the priorities and influencing the outcomes. What I did not know then was that my campaign would be outspent by more than \$2 million, and that I would need to tap my own resources. I just started running with the confidence that we would figure it out.

But after campaigning for a while, and having asked so many people to invest in me financially, I determined I would do the same. Having made that decision, I didn't give much thought to which bank account to use. We considered all of the income that Dave and I earned to be ours, and I had the same right as Dave did to manage and spend it. So, over the course of the campaign, we decided to move \$300,000 from income Dave had earned to

our joint checking account; Dave deposited \$50,000 and \$55,000 into our joint checking account before I filed my first and second quarterly reports in 2018, and in August, he deposited an additional \$200,000. I loaned money to my campaign in similar amounts from that joint checking account – \$50,000 on March 31st, \$50,000 on June 30th, and \$200,000 on August 22nd. Later in the campaign, I used a home equity line of credit to loan my campaign an additional \$71,000.

I could have done it differently. I could have dipped into open lines of credit on our homes, like I did for the last loan of \$71,000, for all of the loans. We had \$2 million in equity in our two homes, and a \$700,000 line of credit available. Or I could have saved more of my Concire income to use on the campaign and used Dave's income to cover all household expenses. But I never gave it much thought, because we had never structured our finances that way. All of it – what I earned, what Dave earned – was **our** money, regardless of whether it was in my account, Dave's account, or a joint account.

I now know that the way I contributed those funds constitute a gray area in campaign finance law. I also know that the Federal Election Commission's past rulings suggest what I did was **not** a violation, including the following high-profile cases:

- Jane Fonda – yes, that Jane Fonda – was the subject of a complaint in the 1970s because funds from her account were used to support her husband's campaign. But the Federal Election Commission decided that Fonda and her husband had an equal right to manage and spend those funds, and found no violation.
- Bob Dole – yes, that Bob Dole – was the subject of a complaint in the 1980s because funds from his wife were used to support his campaign. But the Federal Election Commission decided that there was no violation, because they both had a right to those funds under state law.
- Several years ago, the Federal Election Commission did not find a violation when a Senate candidate loaned money to her campaign from a joint account she maintained with her husband, which her husband had funded with his own income.

- And perhaps most tellingly, several commissioners on the Federal Election Commission looked at the question of how to determine when funds belonged to one family member versus another family member, and described it all as “hopelessly muddled.”

I realize that I could have done it differently and that how I did has raised some questions. But it has also given rise to the claim that somehow Concire wasn't legitimate, or worse, that it was purely a vehicle for me to raise money for my campaign.

These claims are ridiculous and deeply offensive to me, both personally and professionally. Starting a business is hard. Negotiating contracts is hard. Delivering on your brand promise is hard. I take solace in assuming that the people who suggest Concire wasn't real have probably never sat across the table from a procurement officer at a Fortune 500 company and won that signature, and probably haven't told a CEO that a line of business should be spun off or sold.

Finally, last year, I discovered that my campaign made several errors in our personal financial disclosure statements and federal election reports. For many first time candidates like myself, this is common. The House Ethics Committee has written that, “between 30% and 50% of all Financial Disclosure Statements reviewed by the Committee each year contain errors or require a corrected statement....accordingly, errors and omissions in Financial Disclosure Statements are an ordinary part of the process for many filers.”

There is no plausible argument that anything in the amended forms would have changed anyone's vote; nonetheless, voters deserve transparency and accuracy from candidates and elected officials, and I regret that there were inadvertent omissions and errors in my initial filings. I have hired the premiere campaign finance law firm in the nation to handle all campaign reporting issues moving forward. And these statements and filings were amended and made accurate, to the best of my knowledge, immediately following the 2018 election.

The 2018 primary campaign in the 3rd Congressional District was perhaps the most competitive in the nation. My campaign was dramatically outspent at every turn. We competed with grit and integrity in a hard-won, fast

moving race. From the outset, we raised money predominantly from people who lived and worked in the district and we rejected corporate PAC money.

I remain incredibly proud of the campaign we ran – and the path we took to fund it. Running for office is hard. Winning is even harder. And, yes, sometimes I do think it's even more difficult for women and working mothers like me. Our campaign was outspent three to one. We proved that it's not about who spends the most money but about authentic connections to voters and lifelong roots in the community.

It is the honor of my lifetime to represent my home in Congress and bring needed change to Washington. The confusion my former opponent has created about my family's finances will not distract me from a much more urgent concern: securing the financial future of the working people throughout our district.