



★ VIRGINIA ★
STATE BOARD *of* ELECTIONS

BOARD MEETING

Tuesday, September 15, 2026
Washington Building
Martha Brissette Conf. Rm – B27
Richmond, VA
Video and Teleconference

Videoconference:

<https://covaconf.webex.com/covaconf/j.php?MTID=meb2023ffa607805cfa24075c7c013343>

Meeting password: imDSPJhU863

Teleconference:

1-517-466-2023 US Toll
1-866-692-4530 US Toll-Free
Access Code: 2428 610 3615

1:00 P.M.



**STATE BOARD OF ELECTIONS
AGENDA**

DATE: Tuesday, September 15, 2026

1100 Bank St. Richmond, VA 23219

Martha Brissette Conf. Rm – B27

TELECONFERENCE:

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VIDEO CONFERENCE:

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Password: imDSPJhU863

TIME: 1:00 P.M.

I. CALL TO ORDER

John O'Bannon, Chairman

II. APPROVAL OF MINUTES

Georgia Alvis-Long, Secretary

A. August 18, 2026

III. PUBLIC COMMENT

IV. COMMISSIONER'S REPORT

*Steven Koski
Commissioner*

OLD BUSINESS

**V. State Board of Elections policies 2026-003 and 2026-004
regarding general registrar and electoral board member
removal proceedings**

*Danny Davenport
Director of Policy*

NEW BUSINESS

VI. Virginia's Guide to Hand-Counting and Duplicating Ballots

*Claire Scott
ELECT Policy Analyst*

VII. SBE Advisory Opinion #1 regarding the personal use of campaign funds.

*Kayla Soltis
ELECT Policy Analyst*

VIII. 2027 Locality Elections Security Standard (LESS)

*Brandon Smith
Chief Technology Officer*

IX. Campaign Finance Appeals

A. Locally Assessed Penalty Appeals:

- Friends of Donna Lee Biggs (Portsmouth City)
- Friends of Sabrina (Fairfax County)
- Friends of Clark Hedrick (Fairfax County)
- Kat's Leadership Committee (Harrisonburg City)

B. State Assessed Penalty Appeals:

- Fight for Fairfax
- Virginia 3rd District GOP
- Factocracy, Inc.

*Emily Mynarski
Campaign Finance Compliance
and Training Specialist*

X. CLOSED SESSION

XI. ADJOURNMENT

NOTE: <https://townhall.virginia.gov/L/ViewMeeting.cfm?MeetingID=43690>

Re. Entrance to the Washington Building

All members of the public will be required to show his/her driver's license, passport or other government issued ID to enter the Washington Building.

Re. public comment

Public comment will first be heard from those persons participating in person as per the sign-up list. Next, we will hear from the persons who requested to speak via chat on WebEx. Last, we will hear from persons who provided their name and phone number to FOIA@elections.virginia.gov.

Re. limitation on individual participation in public comment

Due to the large number of persons who may wish to speak, we encourage you to be as brief as possible, with a maximum of **THREE** minutes per person. We also ask that you be prepared to approach the podium or unmute yourself if you hear your name announced as the next participant.

Re. individual requests for additional information

Citizens seeking additional information related to matters on this agenda may submit questions to info@elections.virginia.gov

Re. How to Participate in Public Comment

If you are a member of the public and wish to participate, you must sign up in order to be recognized to speak. Please note the following:

If you are attending in person, please ensure your name is on the sign-up list at the front door.

If you are participating virtually using WebEx, sign up using the chat feature, located on the bottom right part of the WebEx application, to add your participant's name.

If you are participating virtually using a phone and cannot access WebEx's chat feature, please send an email with your name and your phone number to FOIA@elections.virginia.gov. You will need to provide your first and last name and the phone number you've used to call in.



★ VIRGINIA ★
STATE BOARD *of* ELECTIONS

Approval of Minutes

BOARD WORKING PAPERS

1 The State Board of Elections (“the Board”) meeting was held on Tuesday,
2 August 18, 2026 in Martha Brissette Conference Room of the Washington Building
3 in Richmond, Virginia. The meeting also offered public participation through
4 electronic communication so the remote public could view and hear the meeting. In
5 attendance: John O’Bannon, Chairman; Rosalyn R. Dance, Vice Chair; Georgia
6 Alvis-Long, Secretary; Dr. Chris Stolle and Dr. Sally Hudson, members
7 represented the State Board of Elections (“the Board”). Steven Koski,
8 Commissioner, and Ashley Coles, Deputy Commissioner represented the
9 Department of Elections (“ELECT”), and Ajay P. Saini represented the Office of
10 the Attorney General (“OAG”); attended the meeting electronically. Chairman
11 O’Bannon called the meeting to order at 1:00 P.M.

12 The first item of business was the Approval of the minutes from the June 30,
13 2026 and August 4, 2026 Board Meetings. Dr. Stolle moved *to approve of the*
14 *minutes as distributed and presented.* Vice Chair Dance seconded the motion and
15 the motion passed unanimously. A roll vote was taken:

16 Chairman O’Bannon – Aye

17 Vice Chair Dance – Aye

18 Secretary Alvis-Long – Aye

19 Dr. Stolle – Aye

20 Dr. Hudson – Aye

21 Chairman O'Bannon opened the floor to public comment. No public
22 comment was given.

23 The next item of business was the Commissioner's Report, presented by
24 Commissioner Koski. Commissioner Koski expressed his appreciation to the
25 Electoral Boards ("EB"), General Registrars ("GR"), and the Election Poll workers
26 for a conducting a smooth election. The Commissioner stated that ELECT has had
27 a bifurcated candidate filing because of the shifted August primary and ELECT has
28 done a great job of adjusting and being resourceful. Commissioner Koski advised
29 the Board that ELECT has a quick turnaround to prepare for early voting in
30 September. The Commissioner expressed his appreciation to ELECT staff for
31 guiding the localities during this process.

32 Commissioner Koski informed the Board that two items on the agenda
33 related to the removal of EB members and GR's were passed during the last
34 Legislative Session. The Commissioner stated that ELECT was directed to prepare
35 procedures for the removal. Commissioner Koski advised the Board that the
36 legislation gives removal authority to the EB members and the Board. The

37 Commissioner informed the Board that ELECT has received comments and
38 additional information. Commissioner Koski recommended that the Board defer
39 the two removal polices until the September 15th Board meeting.

40 The next item of business was the Certification of August 4, 2026 Primary
41 Election, presented by John Cronin, Election Services Manager. *This memo is in*
42 *the Working Papers for the August 18, 2026 Meeting.* Dr. Stolle stated after
43 reviewing the Abstracts of Votes Cast in the 2026 August Primary Elections, I
44 move *that the Board certify the statements to be correct and declare the winners of*
45 *each primary to be that party's nominee for the November 3, 2026 General*
46 *Election.* Vice Chair Dance seconded the motion and the motion passed
47 unanimously. A roll call vote was taken:

48 Chairman O'Bannon – Aye

49 Vice Chair Dance – Aye

50 Secretary Alvis-Long – Aye

51 Dr. Stolle – Aye

52 Dr. Hudson – Aye

The next item of business was the Party Abbreviation, presented by John Cronin, Election Service Manager. *This memo is in the Working Papers for the August 18, 2026 Meeting.* Vice Chair Dance moved *that the Board approve the party abbreviations as presented by staff for general and special elections being held through June 30, 2027.* Dr. Stolle seconded the motion and the motion passed unanimously. A roll call vote was taken:

Chairman O'Bannon – Aye

Vice Chair Dance – Aye

Secretary Alvis-Long – Aye

Dr. Stolle – Aye

Dr. Hudson – Aye

The next item of business was the Party Ballot Order Drawing, presented by John Cornin, Election Services Manager. *This memo is in the Working Papers for the August 18, 2026 Meeting.* Vice Chair Dance conducted the drawing for “political parties” order. The ballot order is as follows:

1. Democratic

2. Republican

70 Vice Chair Dance conducted the drawing for “recognized parties” order. The ballot
71 order as follows:

72 3. Green

73 4. Libertarian

74 Dr. Stolle moved *that the Board approve the party abbreviations as presented by*
75 *staff for general and special elections being held through June 30, 2027.* Secretary
76 Alvis-Long seconded the motion and the motion passed unanimously. A roll call
77 vote was taken:

78 Chairman O’Bannon – Aye

79 Vice Chair Dance – Aye

80 Secretary Alvis-Long – Aye

81 Dr. Stolle – Aye

82 Dr. Hudson – Aye

83 The next item of business was the Hart VVGS 2.0 Vanguard 1.0

84 Certification, presented by Londo Andrews, Voting Systems Security Manager.

85 *This memo is in the Working Papers for the August 18, 2026 Meeting.* Vice Chair

86 Dance moved *that the Board certify the use of Hart InterCivic Inc., voting system -*

87 *Verity Vanguard 1.0, in elections in the Commonwealth of Virginia, pursuant to the*
88 *State Certification of Voting Systems: Requirements and Procedures.* Dr. Stolle
89 seconded the motion and the motion passed unanimously. A roll call vote was
90 taken:

91 Chairman O'Bannon – Aye

92 Vice Chair Dance – Aye

93 Secretary Alvis-Long – Aye

94 Dr. Stolle – Aye

95 Dr. Hudson – Aye

96 The next item of business was the Risk Limiting Audit Decision: Selection
97 of methods for the Statutorily Required RLA and Setting the Risk Limit for the
98 November 2026 Risk Limiting Audits presented by Claire Scott, ELECT Policy
99 Analyst. *These memos are in the Working Papers for the August 18, 2026 Meeting.*
100 Secretary Alvis-Long moved *that the State Board of Elections utilize the batch-*
101 *comparison method to conduct a risk limiting audit for a randomly selected U.S.*
102 *House of Representatives race after the November 2026 General Election.* Dr.
103 Stolle seconded the motion. The motion passed.

104 Vice Chair D Chairman O'Bannon – Aye

105 Vice Chair Dance – Nay

106 Secretary Alvis-Long – Aye

107 Dr. Stolle – Aye

108 Dr. Hudson – Aye

109 Vice Chair Dance moved *that the State Board of Elections utilize the ballot-*
110 *polling method to conduct a risk-limiting audit for a randomly selected U.S. House*
111 *of Representatives race after the November 2026 General Election.* The motion
112 failed for lack of a second.

113 Dr. Stolle moved *that the State Board of Elections set the risk limit to 10%*
114 *for the statutorily required November 2026 RLAs and for any possible approved*
115 *RLAs requested by a local electoral board.* Dr. Hudson seconded the motion and
116 the motion passed unanimously. A roll call vote was taken:

117 Chairman O'Bannon – Aye

118 Vice Chair Dance – Aye

119 Secretary Alvis-Long – Aye

120 Dr. Stolle – Aye

121 Dr. Hudson – Aye

122 The next item of business was the Proposed Amendments to the Risk-
123 limiting Audit Manual, presented by Claire Scott, ELECT Policy Analyst. *This*
124 *memo is in the Working Papers for the August 18, 2026 Meeting.* Vice Chair Dance
125 moved that the State Board of Elections approve the amendments to the RLA
126 Manual as presented. Dr. Stolle seconded the motion and the motion passed
127 unanimously. A roll call vote was taken:

128 Chairman O'Bannon – Aye

129 Vice Chair Dance – Aye

130 Secretary Alvis-Long – Aye

131 Dr. Stolle – Aye

132 Dr. Hudson – Aye

133 The next item of business was the Regulation of the Personal Use of
134 Campaign Funds presented by, Danny Davenport, Director of Policy. *This memo is*
135 *in the Working Papers for the August 18, 2026 Meeting.* Dr. Stolle moved *that the*
136 *State Board of Elections approve the proposed changes to Board regulations*

137 *IVAC20-90-10, IVAC20-90-50 and IVAC20-90-60.* Secretary Alvis-Long
138 seconded the motion and the motion passed unanimously. A roll call vote was
139 taken:

140 Chairman O'Bannon – Aye

141 Vice Chair Dance – Aye

142 Secretary Alvis-Long – Aye

143 Dr. Stolle – Aye

144 Dr. Hudson – Aye

145 The next item of business was the Proposed changes to 1VAC20-70-40
146 Absentee Pre-Processing Regulations presented by, Danny Davenport, Director of
147 Policy. *This memo is in the Working Papers for the August 18, 2026 Meeting.* Vice
148 Chair Dance moved *that the State Board of Elections approve the proposed*
149 *changes to regulatory action IVAC20-70- 40.* Secretary Alvis-Long seconded the
150 motion and the motion passed unanimously. A roll call vote was taken:

151 Chairman O'Bannon – Aye

152 Vice Chair Dance – Aye

153 Secretary Alvis-Long – Aye

154 Dr. Stolle – Aye

155 Dr. Hudson – Aye

156 The next item on the agenda was the Proposed SBE Policies 2026-003:

157 General Registrar Removal Procedures by Local Electoral Boards; and 2026-004:

158 State Board of Elections removal of General Registrars and Local Electoral Board

159 Members presented by, Danny Davenport. *The memo is in the Working Papers for*

160 *the August 18, 2026 Meeting.* No motion was made.

161 At 1:57 P.M., Dr. Stolle stated pursuant to Virginia Code Section 2.2-

162 3711(A)(7), I move *that the Board go into closed session for the purpose of*

163 *discussing pending threatened litigation. In accordance with Section 2.2-3712(F),*

164 *Steven Koski, Commissioner of Elections, Ashley Coles, Deputy Commissioner of*

165 *Elections, and Ajay Saini, Office of the Attorney General, will attend the closed*

166 *session because their presence will reasonably aid the Board in its consideration of*

167 *the subject of the meeting.* Vice Chair Dance seconded the motion and the motion

168 passed unanimously. A roll call vote was taken:

169 Chairman O'Bannon – Aye

170 Vice Chair Dance – Aye

171 Secretary Alvis-Long – Aye

172 Dr. Stolle – Aye

173 Dr. Hudson – Aye

174 At 2:16 P.M., Vice Chair Dance moved *to reconvene the meeting in open*
175 *session, and take a roll call vote certifying that to the best of each member's*
176 *knowledge (i) only such public business matters lawfully exempted from open*
177 *meeting requirements under this chapter and (ii) only such public business matters*
178 *as were identified in the motion by which the closed meeting was convened were*
179 *heard or discussed by the State Board of Elections.* Dr. Stolle seconded the motion
180 and the motion passed unanimously. A roll call vote was taken:

181 Chairman O'Bannon – Aye

182 Vice Chair Dance – Aye

183 Secretary Alvis-Long – Aye

184 Dr. Stolle – Aye

185 Dr. Hudson – Aye

186 Vice Chair Dance moved *to adjourn the meeting*. Dr. Stolle seconded the
187 motion and the motion passed unanimously. A roll call vote was taken:

188 Chairman O'Bannon – Aye

189 Vice Chair Dance – Aye

190 Secretary Alvis-Long – Aye

191 Dr. Stolle – Aye

192 Dr. Hudson – Aye

193 The meeting adjourned at 2:16 P.M.

194

195

196 _____

197 Chairman

198

199 _____

200 Vice-Chairman

201

202 _____

203 Secretary

State Board of Elections
Tuesday, August 18, 2026
FINAL Meeting Minutes

204

205

206 Board Member

207

208

209 Board Member



★ VIRGINIA ★
STATE BOARD *of* ELECTIONS

Public Comment

BOARD WORKING PAPERS



★ VIRGINIA ★
STATE BOARD *of* ELECTIONS

Commissioner's Report

BOARD WORKING PAPERS

Steven Koski
Commissioner



★ VIRGINIA ★
STATE BOARD *of* ELECTIONS

State Board of Elections policies 2026-003 and 2026-004 regarding general registrar and electoral board member removal proceedings

BOARD WORKING PAPERS

Danny Davenport
Director of Policy



★ VIRGINIA ★
DEPARTMENT *of* ELECTIONS

Memorandum

To: Chairman O'Bannon, Vice-Chair Dance, Secretary Alvis-Long, Dr. Christopher Stolle, and Dr. Sally Hudson
From: Daniel Davenport, Director of Policy
Date: September 15, 2026
Re: Proposed SBE Policies 2026-003: General Registrar Removal Procedures by Local Electoral Boards; and
2026-004: State Board of Elections removal of General Registrars and Local Electoral Board Members

Proposed Motion:

"I move that the State Board of Elections approve proposed SBE Policies 2026-003: Local Electoral Board Procedures for the Removal of General Registrars and 2026-004: State Board of Elections Procedures for the Removal of General Registrars and Local Electoral Board Members.

Applicable Statutes:

- Va. Code § 24.2-103. Powers and duties in general; report
- Va. Code § 24.2-109. Appointment and removal of general registrar; appointment of officers of election; powers and duties in general.
- Va. Code § 24.2-234.1. Removal of members of local electoral boards and general registrars.

Background

The 2026 session of the Virginia General Assembly passed into law Chapter 1032 of the 2026 Governor's Acts of Assembly relating to elections; administration; procedures for removal of electoral board members and general registrars. This enacted bill modifies Va. Code §§ 24.2-103 and 24.2-109, with such modifications becoming effective on July 1, 2026.

On August 18, 2026, the SBE heard a presentation from ELECT staff regarding the aforementioned proposed removal policies. However, the SBE did not yet hold a vote regarding adoption of the policies. Rather, the SBE's consideration of the proposed policies was continued to this meeting of the SBE, to provide ELECT with time to consider and implement recommended suggestions from the Virginia Electoral Board Association.

If adopted, SBE Policy 2026-003 will establish standards and procedures regarding local electoral boards, when conducting hearings to remove a general registrar. If adopted, SBE Policy 2026-004 will set standards and procedures regarding: SBE hearings to remove a GR or EB; and SBE hearings reviewing an EB's decision to remove a GR.

ELECT Recommendation

ELECT staff recommends that the State Board of Elections adopt the removal policies as presented.

State Board of Elections Policy 2026-003

A meeting of the Virginia State Board of Elections (the SBE) was held on September 15, 2026, during which the following policy was proposed by the Virginia Department of Elections (ELECT) and approved by the SBE:

Local Electoral Board Procedures for the Removal of General Registrars

PURPOSE: To establish standards and procedures for local electoral boards (EBs) when conducting public hearings to (i) institute proceedings for removal of a general registrar (GR) or (ii) directly remove a GR, pursuant to Va. Code §§ 24.2-109, 24.2-234.1, and 2.2-4000 *et seq.* However, conflicting authorities, including court orders, decisions, statutes, and regulatory actions, may supersede the effects of part or all of this policy. Where such an authority conflicts with only part of this policy, the remainder of the policy shall still apply.

REFERENCES: Va. Code §§24.2-109, 24.2-234.1, and 2.2-4000 *et seq.*

SEC. 1. POLICY ESTABLISHMENT

Subsequent to its adoption by the majority of the SBE, this policy shall be posted on the Virginia Department of Elections website.

SEC. 2. ABBREVIATIONS AND DEFINITIONS*Abbreviations*

- “EB” refers to the local electoral board of a locality.
- “EB member” refers to a member of a locality’s electoral board.
- “ELECT” refers to the Virginia Department of Elections.
- “GR” refers to the general registrar or director of elections in a locality.
- “OAG” refers to the Virginia Office of the Attorney General.
- “SBE” refers to the Virginia State Board of Elections.
- “USPS” refers to the United States Postal Service.

Definitions

“Secretary” means the secretary of the local electoral board.

SEC. 3. CRITERIA FOR REMOVAL

I. Criteria for Removal

Pursuant to Va. Code § 24.2-109, a GR may be removed or have removal proceedings instituted against them for:

- i. Neglect of a clear, ministerial duty of the office, misuse of the office, or incompetence in the performance of the duties of the office where such neglect, misuse, or incompetence has a material adverse effect upon the conduct of the office; or
- ii. An unambiguous indication of a future refusal or failure to carry out the duties of the office where such refusal or failure would likely have a material adverse effect upon the conduct of the office.

II. Vote for Direct Removal by the EB

An EB may remove a GR by a recorded unanimous vote of all its members after a public hearing on related matters.

III. Vote to Institute Circuit Court Removal Proceedings

An EB may institute proceedings pursuant to Va. Code § 24.2-234.1 for the removal of a GR by a recorded majority vote of the EB after a public hearing on related matters.

SEC. 4. REQUEST FOR REMOVAL OF A GR

1. An EB member may request that the EB conduct a public hearing to have a GR removed or have removal proceedings instituted against them pursuant to Va. Code § 24.2-234.1.
2. The request shall be provided to all members of the EB.
3. Requests must contain the following information:
 - The name and position of the EB member making the request.
 - The GR's name, position, and the locality in which they serve.
 - The laws and/or policies the GR is alleged to have violated.
 - A credible allegation or allegations under Va. Code § 24.2-109 regarding specific actions, omissions, or unambiguous indications of future refusal or failure to act that satisfy the standards for removal from **SEC. 3 (I). Criteria for Removal**.
 - The name and contact information of any person the EB member knows to have knowledge of underlying facts relating to the allegation(s).
 - If available, attached documentation supporting the allegation.

SEC. 5. PUBLIC HEARING

I. Notice Requirements

The Secretary of the EB must provide the GR with adequate notice prior to the public hearing. The Secretary shall send notice to the GR within five business days of the EB's decision but no later than 15 days before the scheduled public hearing.

The notice shall contain:

- The statutory provision(s) under which the EB is exercising its authority.
- The laws and/or policies the GR is alleged to have violated.
- The matters of fact and law at question, including an explanation of the violation alleged, and including the standards for removal from **SEC. 3 (I). *Criteria for removing a GR.***
- The date, time, and location of the public hearing.
- This policy.

Notice shall be sent to the GR's office via USPS or delivered in-person by an EB member. Additionally, notices may be sent to the GR's professional email address or personal email address, if known by the Secretary of the EB.

II. Time of Hearing

The hearing should be conducted at the next public meeting of the EB following the notice provisions required in subsection I of this section.

III. Rights of the EB Member Requesting the Hearing

The EB member requesting the hearing may:

- Submit oral and documentary evidence, including testimony.
- Provide a rebuttal or additional context in response to a GR to elicit a full and fair disclosure of the facts.
- Have the proceedings completed efficiently and a decision made promptly.

IV. Rights of the GR

A GR may:

- Be accompanied by and represented by counsel.
- Submit oral and documentary evidence.
- Provide a rebuttal or additional context in response to the EB member who requested the hearing, to elicit a full and fair disclosure of the facts.
- Have the proceedings completed efficiently and a decision made promptly.
- In the event of removal, file a notice of appeal to the SBE within three business days of the EB's decision.

A GR shall be given the opportunity to, on request and before actions are taken, submit in writing for the record:

- Proposed findings and conclusions; and
- Statements of reasons for the proposed findings and conclusions.

V. Role of the EB

The EB may:

- Administer oaths and affirmations;
- Receive probative evidence;
- Exclude irrelevant, immaterial, insubstantial, privileged, or repetitive evidence;
- Rule upon offers of proof;
- Oversee a verbatim recording of the evidence;
- Hold conferences for the settlement or simplification of issues by consent;
- Dispose of procedural requests; and
- Regulate and expedite the course of the hearing.

VI. Preservation of Evidence

All evidence introduced at the hearing must be preserved and maintained in an official evidentiary record, subject to review by the SBE. To preserve and maintain evidence, the EB should:

- Give each unique document an exhibit letter from A-Z, then from AA-ZZ, then from AAA-ZZZ as needed.
- Clearly record all proceedings and testimony. ELECT recommends testing recording equipment before a hearing, as failure to record can materially impact appeals by the GR.
- Retain all exhibits and testimony in an electronic format that can be produced in the event of an appeal.

VII. Default orders

- If the GR without good cause fails to attend or appear at a hearing, the EB may issue a default order against the GR.
- If the EB issues a default order, the EB may conduct all further proceedings necessary to complete the hearing without the defaulting GR's presence at the hearing.
- The issuance of a default order does not eliminate the requirement for a public hearing before the EB may take action, pursuant to Va. Code § 24.2-109.
- A default order is appealable to the SBE pursuant to Va. Code § 24.2-109 and SBE Policy 2026-004: State Board of Elections' Procedures for the Removal of General Registrars or Local Electoral Board Members.

- A GR must file a notice of appeal for a default order within three business days of issuance of the default order.

VIII. Continuance

- A scheduled hearing shall not be delayed by the inability of the GR to attend the hearing unless a request for continuance is made in writing to the EB not less than seven days before the scheduled hearing date.
- Continuance shall not be granted unless the request is received in the required time and, in the opinion of the EB chair, sets forth good and sufficient cause for the continuance. If the chair is the EB member requesting the hearing, the determination shall be made by the EB member serving as the presiding officer.
- If continuance is granted, the Secretary shall notify all EB members and document the grant in the official record of the meeting for continuity.
- A continuance may be granted within seven days of a hearing if there is an emergency circumstance that justifies continuing the hearing.

IX. Requests for Records

- The EB may request additional documents, records, or other evidence that it determines is relevant or necessary to the conduct of the hearing, including upon the request of the GR.
- The GR and the EB member requesting the hearing shall comply with requests by the EB and shall timely acquire and produce all requested documents, records, and other evidence that are reasonably accessible.
- The EB may establish a reasonable deadline and manner for the production of requested documents, records, or other evidence. Any challenge to the reasonableness of such a deadline will be resolved at the discretion of the SBE.

X. Interpreter Services

If an interpreter service is needed for the conduct of the hearing, the EB will make appropriate arrangements to ensure an interpreter is present. A GR requesting an interpreter shall provide the EB with reasonable notice before the hearing. Any challenge to the reasonableness of the notice's timing will be resolved at the discretion of the SBE.

XI. Presentation of the Background

The EB member requesting the hearing shall present information to assist the EB in determining whether to remove the GR or institute removal proceedings.

In presenting the matter, the EB member requesting the hearing shall provide the factual background related to the request and any other information to allow the EB to review the merits of the request, including:

- The name and position of the GR.
- The laws and/or policies the GR is alleged to have violated.
- The matters of fact and law at question, including an explanation of the violation alleged, and including the standards for removal from **SEC. 3 (I). *Criteria for Removal.***
- The evidence submitted supporting the request.
- Mitigating and aggravating factors, including but not limited to:
 - Any history of issues complying with or performing duties of the office.
 - Attempts to improve statutory or policy compliance.
- If the GR without good cause fails to attend or appear at a hearing, the EB may issue a default order against the GR. However, the EB must hold and complete the hearing prior to issuing a default order.

XII. GR Testimony

After presentation of the background, the EB shall invite the GR to present relevant testimony and additional supporting evidence. Each member of the EB shall have the opportunity to question the GR and any other participant in the hearing on all relevant matters including testimony and evidence.

XIII. Decision

At the conclusion of the GR's testimony and EB questions, the EB shall:

- Carry out further deliberation as necessary; and
- Conduct a recorded vote either to:
 - File a petition for removal with the circuit court where the GR serves, pursuant to Va. Code 24.2-234.1 by a majority vote.
 - Remove the GR from their office by a unanimous vote of all EB members; or
 - to dismiss the petition by a majority vote.
- If the EB removes the GR, the decision is appealable to the SBE.

XIV. Notice of Appeal

If an EB removes a GR, the GR so removed may file a notice of appeal to the SBE within three business days.

The notice of appeal should be submitted on a written or electronic form approved by the SBE for such purposes.

SEC. 6. PETITION FOR REMOVAL BY THE CIRCUIT COURT

I. Petition for Removal

A petition for removal shall be on a form prescribed by the SBE and shall state with reasonable accuracy and detail the grounds or reasons for removal. This form shall be signed by the persons making it under penalties of perjury.

The petition shall be filed together with either (i) three paper copies or (ii) an electronic copy.

Removal petitions submitted to the circuit court must contain the following information:

- The GR's identity, including their name, position, and the locality where they serve.
- The laws and/or policies the GR is alleged to have violated.
- The matters of fact and law at question, including an explanation of the violation alleged, and including the standards for removal from **SEC. 3 (III). *Vote to Institute Circuit Court Removal Proceedings.***
- The recorded vote of the EB members.
- Supporting evidence showing:

1. Neglect of a clear, ministerial duty of the office, misuse of the office, or incompetence in the performance of the duties of the office where such neglect, misuse, or incompetence has a material adverse effect upon the conduct of the office;

OR

2. An unambiguous indication of a future refusal or failure to carry out the duties of the office where such refusal or failure would likely have a material adverse effect upon the conduct of the office.

Forms of evidence may include but are not limited to:

- EB minutes from public meetings.
- Emails to or from GRs or EB Members.
- Signed, notarized affidavits of eyewitness testimony.
- Any information required by the circuit court for such petitions.

The petition should be provided to the GR when it is submitted to the circuit court.

- If the EB decides to submit a petition for removal to the circuit court of the locality where the GR serves, the petition shall be signed by a majority of the EB members and submitted to the appropriate court.

- The GR will maintain their office while the proceedings are ongoing at the circuit court.

SEC. 7. APPEALS TO THE SBE

- Pursuant to Va. Code § 24.2-109, if an EB directly removes a GR from office, the GR may appeal such removal by filing a notice of appeal to the SBE within three business days of the EB's decision.
- The notice of appeal must be submitted on a written or electronic form approved by the SBE for such purposes.
- Upon receipt of a properly filed appeal, the SBE shall schedule a public hearing on the matter as soon as practicable.
- A GR who is removed by a unanimous, recorded vote of all members of the EB shall remain in office until the expiration of the deadline to file a notice of appeal or, if the notice of appeal is properly filed, until the SBE renders a final decision upholding the decision of the EB.

I. Notice Requirements

- The SBE shall provide the GR and EB with reasonable notice regarding the public hearing. Upon receipt of a properly filed appeal, ELECT shall send notices to the GR and EB as soon as practicable but no later than 15 business days before the scheduled public hearing.
- The notice must contain:
 - The statutory provision(s) under which the SBE is exercising its authority.
 - The date, time, and location of the public hearing.
 - This policy.
 - Contact information for an ELECT staff member who will assist with administration of the hearing.
- The notice shall be sent to the GR and EB via USPS. If ELECT is aware of email addresses for the GR and EB members, then ELECT may also send such notices via email.
- The notice shall include the date, time, and location of the public hearing.

II. Rights of the GR

The GR may:

- Appear at the hearing.
- Be represented by counsel.
- Present testimony explaining why the EB's removal decision was inappropriate.
- In support of their testimony, the GR may cite evidence and testimony that has been admitted into the evidentiary record.

III. Rights of the EB

The EB may:

- Appear at the hearing.
- Be represented by counsel.
- Present testimony explaining why the EB's removal decision was appropriate.
- Have one EB member provide initial testimony. However, the SBE may call upon any EB member to answer questions.

IV. Role of the SBE

The SBE shall review evidence presented at the hearing and determine whether to reverse or uphold the EB's removal decision. Evidence that the SBE may review includes:

- The evidentiary record from the EB's hearing, including recordings and transcripts of any testimony.
- Testimony by the GR or the EB, as it relates to the outstanding issues of fact and law.

V. Presentation of Background

- In presenting the appeal, ELECT shall present information to assist the SBE in determining whether to uphold the EB's removal decision.
- In presenting the appeal, ELECT shall provide the factual and procedural background related to the appeal and any other information relevant to the merits of the appeal, including:
 - o The date notice of the EB hearing was provided to the GR
 - o The date of the EB hearing and removal decision.
 - o The date of the appeal and whether the appeal was properly filed.
 - o The laws and/or policies the GR was found to have violated.
 - o The matters of fact and law at question, including the standards for removal under **SEC. 3(I). Criteria for removal.**
 - o The name of the GR and the locality they serve;
 - o The provision(s) of Title 24.2 allegedly violated;
 - o The evidence submitted supporting the petition;
 - o Any procedural issues related to the EB hearing raised on appeal;
 - o Mitigating/aggravating factors, including but not limited to:
 - Any history of issues complying with or performing duties of the office.
 - Attempts to improve statutory or policy compliance.

VI. GR testimony

- After presentation of the background by ELECT, the SBE shall invite the GR to present relevant testimony and additional supporting evidence.

- Each member of the SBE shall have the opportunity to question the GR, ELECT staff, and any other participant in the hearing on all matters related to the petition and testimony and evidence received.

VII. Decision

- At the conclusion of the GR's testimony and SBE questions, the SBE shall:
 - Carry out further deliberation as necessary
 - Consult with counsel in closed session as necessary; and
 - Conduct a recorded vote decided either to:
 - Reverse the decision of the EB by a two-thirds majority vote of all its members; or
 - Uphold the decision of the EB by a simple majority vote.
- If the SBE reverses the decision of the EB, such decision shall be final and not subject to appeal.

This policy is effective September 15, 2026.

State Board of Elections Policy 2026-004

A meeting of the Virginia State Board of Elections (SBE) was held on September 15, 2026, during which the following policy was proposed by the Virginia Department of Elections (ELECT) and approved by the SBE:

State Board of Elections Procedures for the Removal of General Registrars and Local Electoral Board Members

PURPOSE: To establish standards and procedures for the SBE when conducting public hearings to (i) institute proceedings for removal of a general registrar (GR) or local electoral board member (EB member) or (ii) directly remove a GR or EB member, pursuant to Va. Code §§ 24.2-103, 24.2-234.1, and 2.2-4000 *et seq.* However, conflicting authorities, including court orders, decisions, statutes, and regulatory actions, may supersede the effects of part or all of this policy. Where such an authority conflicts with only part of this policy, the remainder of the policy shall still apply.

REFERENCES: Va. Code §§ 24.2-103, 24.2-234.1, and 2.2-4000 *et seq.*

SEC. 1. POLICY ESTABLISHMENT

Subsequent to its adoption by the majority of the SBE, this policy shall be posted on the Virginia Department of Elections website.

SEC. 2. ABBREVIATIONS AND DEFINITIONS*Abbreviations*

- “EB” refers to the local electoral board of a locality.
- “EB member” refers to a member of a locality's electoral board.
- “ELECT” refers to the Virginia Department of Elections.
- “GR” refers to the general registrar or director of elections in a locality.
- “OAG” refers to the Virginia Office of the Attorney General.
- “SBE” refers to the Virginia State Board of Elections.
- “USPS” refers to the United States Postal Service.

Definitions

“Complainant” means an individual residing in the locality where the EB member or GR serves who is submitting a complaint against an EB member or GR.

“Respondent” means the EB member or GR who is the subject of the complaint

SEC. 3. CRITERIA FOR REMOVAL*I. Criteria for Removal*

Pursuant to Va. Code § 24.2-103, an EB member or GR may be removed or have removal proceedings instituted against them for:

- i. Neglect of a clear, ministerial duty of the office, misuse of the office, or incompetence in the performance of the duties of the office where such neglect, misuse, or incompetence has a material adverse effect upon the conduct of the office; or
- ii. An unambiguous indication of a future refusal or failure to carry out the duties of the office where such refusal or failure would likely have a material adverse effect upon the conduct of the office.

Pursuant to Va. Code § 24.2-103, the SBE shall institute proceedings against any EB member who neglects or refuses to carry out any clear ministerial duty of the office in accordance with law.

II. Vote for Direct Removal by the SBE

The SBE may remove any EB member or GR by a recorded two-thirds majority vote of all its members after a public hearing on related matters.

III. Vote to Institute Circuit Court Removal Proceedings

The SBE may institute proceedings pursuant to Va. Code § 24.2-234.1 for the removal of an EB member or GR by a recorded majority vote of the SBE after a public hearing on related matters.

SEC. 4. COMPLAINT AGAINST AN EB MEMBER OR A GR

1. Complaints may be filed by a resident, the GR, or an EB member of the locality in which the Respondent serves. Complaints may also be filed by ELECT.
2. Complaints must be sent via certified mail to:

Virginia Department of Elections
1100 Bank Street, 1st Floor
Richmond, Virginia 23219

3. Complaints must contain the following information:

- The name and address of the complainant.
- The EB member or GR's name, position, and locality in which they serve.

- The laws and/or policies the EB member or GR is alleged to have violated.
 - A credible allegation or allegations under Va. Code § 24.2-103 regarding specific actions, omissions, or unambiguous indications of future refusal or failure to act that satisfy the standards for removal from **SEC.3 (I). *Criteria for Removal.***
 - The name and contact information of any person the Complainant knows to have knowledge or underlying facts relating to the allegation(s).
 - If available, attached documentation supporting the allegation(s).
 - A sworn statement, notarized, attesting that the information contained in the complaint is accurate and true to the best of the Complainant's knowledge.
 - Any additional information requested by ELECT during its review.
4. ELECT will review complaint(s) for completeness and, if the complaint is complete, prepare documents sufficient for initial review by the SBE during a closed session of the next scheduled public meeting. After reviewing the complaint and the evidence during the closed session, the SBE shall vote on whether to have a public hearing at the next scheduled public meeting consistent with the notice requirements of **SEC. 5 (I). *Notice Requirements.*** A simple majority vote is sufficient.
5. ELECT may request additional information from the Complainant as necessary.

SEC. 5. PUBLIC HEARING

I. Notice Requirements

ELECT must provide the Respondent with adequate notice prior to the public hearing. Should the SBE vote to hold a public hearing, ELECT shall send notice to the Respondent and Complainant within five business days of the SBE's decision but no later than 15 days before the scheduled public hearing.

The notice shall contain:

- The statutory provision under which the SBE is exercising its authority.
- The laws and/or policies the GR or EB member are alleged to have violated.
- The matters of fact and law at question including an explanation of the violation alleged, including the standards for removal from **SEC. 3 (III). *Vote to Institute Circuit Court Removal Proceedings.***
- The date, time, and location of the public hearing.
- The relevant complaint.
- This policy.
- Contact information for ELECT staff.

Notice shall be sent to the Respondent via USPS. Additionally, notices may be sent via email to the GR's professional email address or personal email address, if known by ELECT.

II. Time of hearing

The hearing should be conducted at the next public meeting of the SBE following the notice provisions required in subsection I of this section.

III. Rights of the Complainant

A Complainant may:

- Submit oral and documentary evidence, including testimony.
- Provide a rebuttal or additional context to the Chairman of the SBE in response to a Respondent to elicit a full and fair disclosure of the facts.
- Have the proceedings completed efficiently and a decision made promptly.

IV. Rights of the Respondents

A Respondent may:

- Be accompanied by and represented by counsel.
- Submit oral and documentary evidence.
- Provide a rebuttal or additional context to the Chairman of the SBE in response to a Complainant to elicit a full and fair disclosure of the facts.
- Have the proceedings completed efficiently and a decision made promptly.

A Respondent shall be given the opportunity to, on request and before actions are taken, submit in writing for the record:

- Proposed findings and conclusions; and
- Statements of reasons for the proposed findings and conclusions.

V. Role of the SBE

The SBE may:

- Administer oaths and affirmations;
- Receive probative evidence;
- Exclude irrelevant, immaterial, insubstantial, privileged, or repetitive evidence;
- Rule upon offers of proof;
- Oversee a verbatim recording of the evidence;
- Dispose of procedural requests and
- Regulate and expedite the course of the hearing.

VI. Preservation of Evidence

All evidence introduced at the hearing must be preserved and maintained in an official evidentiary record, subject to judicial review. To preserve and maintain evidence, the SBE should:

- Give each unique document an exhibit letter from A-Z, then from AA-ZZ, then from AAA-ZZZ as needed.
- Clearly record all proceedings and testimony.
- Retain all exhibits and testimony in an electronic format that can be produced in the event of judicial review.

VII. Default orders

- If a respondent without good cause fails to attend or appear at a hearing, the SBE may issue a default order against the respondent.
- If the SBE issues a default order, the SBE may conduct all further proceedings necessary to complete the hearing without the defaulting Respondent's presence at the hearing.
- The issuance of a default order does not eliminate the requirement for a public hearing before the SBE may take action, pursuant to Va. Code § 24.2-103.

VIII. Continuance

- A scheduled hearing shall not be delayed by the inability of the Respondent to attend the hearing unless a request for continuance is made in writing to the SBE not less than seven days before the scheduled hearing date.
- Continuance shall not be granted unless the request is received in the required time and, in the opinion of the Chairperson of the SBE, sets forth good and sufficient cause for the continuance.
- If a continuance is granted, ELECT staff shall notify all members of the SBE and document the grant in the official record of the meeting for continuity.
- At the SBE's discretion, a continuance may be granted within seven days of a hearing if there is an emergency circumstance that justifies continuing the hearing.

IX. Requests for Records

- The SBE may, at any time, request additional documents, records, or other evidence that it determines is relevant or necessary to the conduct of the hearing, including upon the request of a Respondent .
- Respondents and Complainants shall comply with requests by the SBE and shall timely acquire and produce all requested documents, records, and other evidence that are reasonably accessible.
- The SBE may establish a reasonable deadline and manner for the production of requested documents, records, or other evidence.

X. Interpreter Services

If an interpreter service is needed for the conduct of the hearing, ELECT will make appropriate arrangements to ensure an interpreter is present. The Claimant or Respondent requesting an interpreter shall provide ELECT with reasonable notice before the hearing.

Whether the timing of a request was reasonable will be resolved at the discretion of the SBE.

XI. Presentation of the Background by ELECT

ELECT shall present information to assist the SBE in determining whether to remove the GR or EB member or institute removal proceedings.

In presenting the matter, ELECT shall provide the factual background related to the Complaint and any other information to allow the SBE to review the matter, including:

- Date of receipt of the complaint.
- The name and position of the Respondent.
- The law and/or policies the Respondent is alleged to have violated.
- The matters of fact and law at question, including an explanation of the violation alleged, and including the standards for removal from **SEC. 3 (I). *Criteria for Removal***.
- The evidence submitted supporting the complaint;
- Mitigating and aggravating factors, including but not limited to:
 - Any history of issues complying with or performing the duties of the office.
 - Attempts to improve statutory or policy compliance.

XII. Respondent Testimony

After presentation of the background by ELECT, the SBE shall invite the Respondent to present relevant testimony and additional supporting evidence. Each member of the SBE shall have the opportunity to question the respondent, ELECT staff, and any other participant in the hearing on all matters related to the complaint, including testimony and evidence.

XIII. Decision

At the conclusion of the respondent's testimony and SBE questions, the SBE shall:

- Carry out further deliberation as necessary;
- Consult with counsel in closed session as necessary, and
- Conduct a recorded vote either to:
 - File a petition for removal with the circuit court where the respondent serves, pursuant to § 24.2-234.1, by a majority vote of the members of the SBE;
 - Remove the GR or EB member from their office by a two-thirds majority vote of all members of the SBE; or
 - to dismiss the complaint by majority vote of the SBE.
- If the SBE decides to submit a petition for removal to the circuit court of the locality where the respondent serves, the petition shall be signed by a majority of the members of the SBE and the OAG will submit the petition to the appropriate court.

- The respondent will maintain their office while the proceedings are ongoing at the circuit court.
- If the SBE decides to directly remove the GR or EB member, the decision is final and shall be subject to judicial review only in accordance with the Administrative Process Act (§ [2.2-4000](#) et seq.).

SEC. 6. PETITION FOR REMOVAL BY THE CIRCUIT COURT

I. Petition for Removal

A petition for removal shall be on a form prescribed by the SBE and shall state with reasonable accuracy and detail the grounds or reason for removal. This form shall be signed by the persons making it under penalties of perjury.

The petition shall be filed together with either (i) three paper copies or (ii) an electronic copy.

Removal petitions submitted to the circuit court must contain the following information:

- The GR or EB member's identity, including their name, position, and the locality where they serve.
 - The laws and/or policies the GR or EB member is alleged to have violated.
 - The matters of fact and law at question, including an explanation of the violation alleged, and including the standards for removal from **SEC. 3 (III). *Vote to Institute Circuit Court Removal Proceedings.***
 - The recorded vote of the SBE.
 - Supporting evidence showing:
 1. Neglect of a clear, ministerial duty of the office, misuse of the office, or incompetence in the performance of the duties of the office where such neglect, misuse, or incompetence has a material adverse effect upon the conduct of the office;
- OR
2. An unambiguous indication of a future refusal or failure to carry out the duties of the office where such refusal or failure would likely have a material adverse effect upon the conduct of the office.

Forms of evidence may include but are not limited to:

- Minutes from public meetings.
- Emails to or from GRs or EB members.
- Signed, notarized affidavits of eyewitness testimony.

- Any information required by the circuit court for such petitions.

The petition should be provided to the EB member or GR when it is submitted to the circuit court.

- The EB member or GR will maintain their office while the proceedings are ongoing at the circuit court.

SEC. 7. APPEALS TO THE SBE

- Pursuant to Va. Code § 24.2-109, if an EB directly removes a GR from office, the GR may appeal such removal by filing a notice of appeal to the SBE within three business days of the EB's decision.
- The notice of appeal must be submitted on a written or electronic form approved by the SBE for such purposes.
- Upon receipt of a properly filed appeal, the SBE shall schedule a public hearing on the matter as soon as practicable.
- A GR who is removed by a unanimous, recorded vote of all members of the EB shall remain in office until the expiration of the deadline to file a notice of appeal or, if the notice of appeal is properly filed, until the SBE renders a final decision upholding the decision of the EB.

I. Notice Requirements

- The SBE shall provide the GR and EB with reasonable notice regarding the public hearing. Upon receipt of a properly filed appeal, ELECT shall send notices to the GR and EB as soon as practicable but no later than 15 business days before the scheduled public hearing.
- The notice must contain:
 - The statutory provision(s) under which the SBE is exercising its authority.
 - The date, time, and location of the public hearing.
 - This policy.
 - Contact information for an ELECT staff member who will assist with administration of the hearing.
- The notice shall be sent to the GR and EB via USPS. If ELECT is aware of email addresses for the GR and EB members, then ELECT may also send such notices via email.
- The notice shall include the date, time, and location of the public hearing.

II. Rights of the GR

The GR may:

- Appear at the hearing.
- Be represented by counsel.

- Present testimony explaining why the EB's removal decision was inappropriate.
- In support of their testimony, the GR may cite evidence and testimony that has been admitted into the evidentiary record.

III. Rights of the EB

The EB may:

- Appear at the hearing.
- Be represented by counsel.
- Present testimony explaining why the EB's removal decision was appropriate.
- Have one EB member provide initial testimony. However, the SBE may call upon any EB member to answer questions.

IV. Role of the SBE

The SBE shall review evidence presented at the hearing and determine whether to reverse or uphold the EB's removal decision. Evidence that the SBE may review includes:

- The evidentiary record from the EB's hearing, including recordings and transcripts of any testimony.
- Testimony by the GR or the EB, as it relates to the outstanding issues of fact and law.

V. Presentation of Background

- In presenting the appeal, ELECT shall present information to assist the SBE in determining whether to uphold the EB's removal decision.
- In presenting the appeal, ELECT shall provide the factual and procedural background related to the appeal and any other information relevant to the merits of the appeal, including:
 - The date notice of the EB hearing was provided to the GR
 - The date of the EB hearing and removal decision.
 - The date of the appeal and whether the appeal was properly filed.
 - The laws and/or policies the GR was found to have violated.
 - The matters of fact and law at question, including the standards for removal under **SEC. 3(I). Criteria for removal.**
 - The name of the GR and the locality they serve;
 - The provision(s) of Title 24.2 allegedly violated;
 - The evidence submitted supporting the petition;
 - Any procedural issues related to the EB hearing raised on appeal;
 - Mitigating/aggravating factors, including but not limited to:
 - Any history of issues complying with or performing duties of the office.
 - Attempts to improve statutory or policy compliance.

VI. *GR Testimony*

- After presentation of the background by ELECT, the SBE shall invite the GR to present relevant testimony and additional supporting evidence.
- Each member of the SBE shall have the opportunity to question the GR, ELECT staff, and any other participant in the hearing on all matters related to the petition and testimony and evidence received.

VII. *Decision*

- At the conclusion of the GR's testimony and SBE questions, the SBE shall:
 - Carry out further deliberation as necessary
 - Consult with counsel in closed session as necessary; and
 - Conduct a recorded vote decided either to:
 - Reverse the decision of the EB by a two-thirds majority vote of all its members; or
 - Uphold the decision of the EB by a simple majority vote.
- If the SBE reverses the decision of the EB, such decision shall be final and not subject to appeal.

This policy is effective September 15, 2026.



★ VIRGINIA ★
STATE BOARD *of* ELECTIONS

Virginia's Guide to Hand-Counting and Duplicating Ballots

BOARD WORKING PAPERS

Claire Scott
ELECT Policy Analyst



★ VIRGINIA ★
DEPARTMENT *of* ELECTIONS

Memorandum

To: Chairman O'Bannon, Vice-Chair Dance, Secretary Alvis-Long, Dr. Christopher Stolle, and Dr. Sally Hudson

From: Claire Scott, ELECT Policy Analyst

Date: September 15, 2026

Re: Updating Virginia's Guide to Hand-counting and Duplicating Ballots

Proposed Motion

"I move that the State Board of Elections approve the amendments to Virginia's Guide to Hand-counting and Duplicating Ballots and that they be effective immediately."

Applicable Statutes

§24.2-103 Powers and duties in general

§24.2-653.01 Provisional ballots; electoral boards to make determination as to validity.

§24.2-673.1 Ranked choice voting.

§24.2-709.2 Processing absentee ballots; duplication of damaged or defective ballots.

Background

Virginia's Guide to Hand-counting Ballots has provided valuable and necessary guidance on how to interpret voter intent in situations that require ballots to be hand-counted. Due to the passage of the 2026 Acts of Assembly Chapter 718, the situations where hand-counting ballots is required have narrowed to specific situations; additionally, the Chapter also allows for the duplication of provisional ballots and certain absentee ballots that are damaged or defective in such a way as to make them unreadable to a voting system. These changes require the modification of Virginia's Guide to Hand-counting Ballots to not only include the specific situations for hand-counting but also considerations for the duplication of ballots.

ELECT Recommendation

ELECT staff recommend approving the amendments presented to the State Board of Elections.

Attachment

Proposed Virginia's Guide to Hand-counting and Duplicating Ballots



Virginia's Guide To Hand-Counting and Duplicating Ballots

Rev. September 2026

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Introduction

Hand-counting and ballot duplication are two processes that allow local election officials to tabulate ballots that cannot be read by a ballot scanner. Hand-counting refers to the act of manually tabulating ballots, i.e., counting them “by hand.” Ballot duplication refers to the process of transcribing a voter’s markings from a damaged or defective machine-readable ballot to another machine-readable ballot.

In Virginia, hand-counting and ballot duplication are allowed only in certain circumstances. Further, some circumstances mandate the use of either hand-counting or ballot duplication. To assist local election officials with the tabulation of ballots, the remainder of this guide explains Virginia’s rules and requirements for hand-counting and ballot duplication.

What will you learn in this guide?

- Definitions of key terms like “Machine-readable ballot” and “Unique identifier.”
- A step-by-step process for ballot duplication
- Answers to frequently asked questions or “FAQs”
- How to determine whether a ballot should or should not be hand-counted or duplicated.

Definitions:

“Ballot duplication” is the process of replacing damaged or improperly marked ballots (i.e. the ballot scanner cannot read the ballot) with a new ballot that preserves the voter’s intent. In Virginia, machine-readable ballots that are damaged or defective cannot be hand-counted and *must* undergo ballot duplication, pursuant to Va. Code §§ 24.2-653.01(D) and 24.2-709.2

“Hand-counting” is the process by which ballots are manually counted rather than tabulated by a ballot scanner. In Virginia, tabulation by hand-count should happen only when a ballot scanner is inoperative, there is no other available scanner, and it would be unreasonable to wait for the inoperative machine to be made operative or replaced with an operative machine. See Va. Code §24.2-654.

“Machine-readable ballot” means a tangible ballot that can be fed into and scanned by a ballot scanner capable of reading ballots and tabulating results. See Va. Code §24.2-101. All machine-readable ballots must be tabulated by the ballot scanner, and damaged or defective machine-readable ballots must be duplicated.

“Non-Machine-readable ballot” means a tangible ballot that cannot be fed into a ballot scanner but is otherwise a valid ballot. Examples of non-machine-readable ballots are electronically transmitted UOCAVA or Print Disabled ballots.

“Unique identifier” means a number or code that links a defective or damaged ballot to its duplicate counterpart. Localities may create their own system for assigning unique identifiers. However, each unique identifier should capture a ballot’s precinct, the date of duplication, the team who duplicated the ballot, and the ballot’s order number (e.g. the 17th ballot that Team A duplicated that day).

When Do I Duplicate?

Ballot duplication *must* occur when:

- A machine-readable ballot is damaged or defective; or
- A machine-readable ballot contains an error, such as a timing-mark error, that renders the ballot unreadable by the ballot scanner.
- Ballot duplication should only occur in three instances:
 1. During an absentee pre-processing meeting;
 2. At the central absentee precinct (CAP) on Election Day; or
 3. During the canvass.

A locality may choose to conduct as many, or as few ballot duplication sessions as needed to process absentee ballots that cannot be read by a ballot scanner.

When Don’t I Duplicate?

Do not perform duplication on ballots that are not inherently machine-readable. For example, ballot duplication is not permitted on electronically transmitted UOCAVA ballots, because even validly marked electronically transmitted UOCAVA ballots are not machine-readable.

During instances where ballot duplication is an option, if a ballot is machine-readable and is not clearly identified as damaged or defective then the ballot should not be immediately duplicated or hand-counted— it must be inserted into the ballot scanner if one is available. If the ballot is inserted into the machine and returned out of the machine due to unreadability, then set aside for duplication.

On Election Day, if the ballot scanner is unable to tabulate a voter's damaged or defaced machine-readable ballot, the officer of election may instead void the damaged ballot and issue a replacement to the voter.

When Do I Hand-Count?

Always hand-count ballots that are not inherently machine-readable, such as electronically transmitted UOCAVA ballots. In rare circumstances, election officials can hand-count machine-readable ballots. However, this is permitted only when all the following apply:

1. The ballot scanner machine is inoperative;
2. There is no other available scanner; and
3. It would be unreasonable to wait for the inoperative ballot scanner to be made operative or an operative ballot scanner to be delivered to the polling place rather than hand-counting the ballots.

When is a scanner considered unavailable or a wait considered unreasonable?

Localities should plan to ensure that any machine-readable ballots that are not defaced or damaged are read by a ballot scanner. Localities should budget to purchase additional ballot scanners so that all machine-readable ballots can be tabulated by machine.

There may be circumstances, including during the post-election period, in which a locality determines that an operative scanner cannot reasonably be made available at a particular location. Under Va. Code § 24.2-654, registrars may, after certain conditions are met, hand count ballots consistent with this guide if it would be unreasonable to wait for an operative ballot scanner to be delivered to the polling place rather than hand counting the ballots.

Localities should exercise their best judgment, on a case-by-case basis, to determine whether the conditions in Va. Code § 24.2-654 have been met, and whether waiting for an operative scanner is unreasonable. If possible, these determinations should be made in consultation with your local attorney and documented. When making these decisions, localities should consider the following:

1. Is there a backup and programmed scanner that can be easily delivered to the voting location?
2. Are all available scanners currently in use?
3. Would assigning an available scanner prevent or otherwise interfere with efficiently running any future ballots through the scanner?
4. If a scanner is inoperative, how long would it take to repair the scanner?

Recommended Ballot Duplication Steps

Preparation

1. Create a chain of custody, accounting, and storage system for tracking ballots that cannot be scanned and will require duplication. Establish a system and schedule for the duplication operation.
2. As part of the pre-processing or post-election notice, give notice to the local political party chairs of the time and place for ballot duplication in sufficient time to allow for the authorized party representatives to be present.
3. At least two officers of election, one representing each political party (as defined by VA Code §24.2-101), shall perform the duplication of ballots. No person present while ballot duplication is occurring shall disclose any information concerning the ballots.

If CAP officers are going to be designated as the pair of election officials to duplicate ballots, make sure to clear their roles with the political party chairs. If service by party is difficult with the lack of party affiliation amongst officers of election, designate a bipartisan pair of EBs to serve as the ballot duplicators for the CAP.

4. Prepare materials and logging templates for establishing unique identifiers and tracking chain of custody for original ballots versus duplicate ballots.
5. Prepare pre-processing staff for identifying ballots to be duplicated. Develop a process for determining a cure versus duplication (see FAQ section for more information on cure).

Processing

1. Once a ballot is identified to require duplication, alert designated staff.
2. Collect the ballot at a central workstation at the meeting and set aside for duplication with any other damaged or defective ballots. If not being duplicated on the same day, these should be stored in a secure location consistent with the locality's security plan.
 - To consolidate the process and improve efficiency, ELECT recommends conducting all pre-processing duplication at the end of pre-processing, at the CAP on Election Day, or at the CAP during post-election.
 - If there are multiple duplication teams across multiple days, each team should have a tracking log to complete while duplicating ballots. The information must be consolidated into a master tracking sheet for each precinct and a grand master tracking sheet for the entire locality.
3. Mark the voter's status in VERIS.
4. Once ready for duplication, retrieve the ballots from the secure location.
5. Use the guidance in this document for determining voter intent.

-
- Voter intent for each ballot must be agreed to by the officers of election present representing the two political parties. If the officers of election cannot agree on voter intent, the ballot cannot be counted and must be determined invalid.

6. Assign the original voter-marked ballot a unique identifier that corresponds with the duplicated ballot. Your unique identifier should, at a minimum, indicate the ballot's precinct, date of duplication, team responsible for duplication, and the duplicated ballot's order (for example, the fourth ballot duplicated by team C for the day).

Each locality may designate its own unique identifier format. Alternatively, localities may choose to follow one of the example formats below:

Example 1:

- F-110926-7-003
 - Precinct F
 - Processed on 11/09/26
 - Team 7 (Carla F and Jack R)
 - 3rd ballot Team 7 duplicated that day

Example 2:

- P215-007
 - Precinct 215
 - 7th ballot transcribed for that precinct
 - Date of transcription and individuals who performed the duplication would be captured on the master Duplication Log

7. Have a team member duplicate the original ballot's selections onto the new duplicate ballot.
8. Place a stamp or written note on the back of the original and duplicate ballot and write:
 - The precinct number/name
 - Original or Duplicate Ballot with a ballot number
 - Examples: "Precinct 101-Central Library Original #1", "Precinct 101-Central Library Duplicate #1"; "Precinct 201 Original #2, "Precinct 201 Duplicate #2"

Note: If a stamp is used, it should be placed on the back of the ballot to keep it away from the area that is read by the ballot scanner, i.e. away from the timing marks and where the voter is marking their votes. Localities may also wish to discuss the placement of the stamp with their vendor.

9. Once complete, insert the duplicate ballot into the ballot scanner. Total results when appropriate and record the results per normal locality process.

Documentation and Records Retention

Robust documentation is key to the successful and transparent implementation of ballot duplication. Local election officials should maintain daily counts, a duplication log, and any other recordkeeping necessary.

The original and duplicated ballots should ultimately be stored with the clerk of court and be organized in such a way to be easily identified. Localities may decide how best to organize the original and duplicate ballots for storage after the ballots have been duplicated and scanned. Examples could include:

- Paperclipping the original ballot and the duplicated ballot together and placing with the other machine-readable ballots in an Envelope 3.
- Keeping the original ballot in one Envelope 3 labeled “Damaged/Defective Original Ballots-Precinct 101” and the duplicated ballot in another Envelope 3 labeled “Duplicated Ballots-Precinct 101.”
- For absentee ballots, ELECT offers a 5A envelope that will capture the original damaged absentee ballot, its B envelope, and its return envelope. This envelope will carry the same retention period as the current Envelope 5. If the absentee ballot duplication process is an on-going process, the unsealed Envelope 5A should be placed in the locality’s locked security area after each day’s activity. In this scenario, the counted duplicated ballots may either be stored in a traditional Envelope 3 with a paperclip or folder to separate these uniquely identified ballots from the other counted absentee ballots or in a uniquely identified Envelope 3, e.g., Envelope 3D, Duplicated Absentee Ballots ONLY.
- For provisional ballots, ELECT recommends that damaged original provisional ballots be returned and sealed in the precinct’s Envelope 1A. Do not attach the original and duplicated ballots with the green provisional envelope to ensure secrecy of the ballot. The counted duplicated provisional ballots may either be stored in a traditional Envelope 3 with a paperclip or folder to separate these uniquely identified ballots from the other counted provisional ballots or in a uniquely identified Envelope 3, e.g., Envelope 3D, Duplicated Provisional Ballots ONLY.

Ensure the locality log of all ballots duplicated is retained by the general registrar and held per the Library of Virginia’s record retention schedule. Example templates can be found in the appendix of this guide.

(Ranked Choice Voting ONLY) A grand master sheet must be created for every RCV contest: one copy must go to the Clerk of Court, one copy must go to ELECT, and one copy must be retained by the general registrar.

Frequently Asked Questions

What if my team cannot determine who the voter voted for?

If the bipartisan review team cannot discern a voter's intent from a damaged ballot, vote a ballot with the contests under contention not marked (under-voted). This may mean voting a blank ballot. If required by your ballot scanners, override a return of duplicated ballots with under-voted offices so the ballot is scanned/counted.

If the team agrees on partial voter intent, the agreed upon office selections should be marked on the duplicate ballot and the other offices left blank. A duplicated ballot with under-voted offices must be overridden by the ballot officer once entered into the ballot scanner.

In a recount, if the teams cannot agree on how to process the ballot, the vote must be challenged and adjudicated by the court.

How do I ensure political party representation for a primary election?

During a primary, officers of election may all represent one party, pursuant to §24.2-115(B). However, pursuant to §§24.2-653.01 and 24.2-709.2, when duplicating damaged or defective provisional or absentee ballots, the team of election officials must represent both political parties. Localities may need to reach out to officers of election who represent the other party to assist in the duplication process during pre-processing, CAP, or during the post-election period. Alternatively, Electoral Board members who represent both parties may work as a duplication team if officers of election representing the other party are unavailable.

Do the same rules apply to Ranked Choice Voting (RCV) elections?

Since ballots in RCV elections require marking ranking selections in a comparable manner to marking candidate selections in traditional elections, the provisions of this guide generally apply to ranked choice voting elections in determining voter intent. See Section 8 for guidance regarding ranked choice voting ballots and example scenarios specific to that method of voting. In the event of a conflict between Section 8 and the remainder of the guide in relation to ranked choice voting, Section 8 shall control.

How does ballot duplication apply to the cure process?

While both processes involve intervention by an election official, the two processes are distinct and function differently.

Cure process

The cure process exists primarily to remedy defects in the *B Envelope* used to return mail absentee ballots. Common errors on the B Envelope include a missing signature or address.

The cure process involves an election official contacting a voter and offering the voter an opportunity to correct any material omissions on the voter's B Envelope. This is because *only a voter can cure their own B Envelope*.

Ballot duplication

Ballot duplication remedies a defect in or damage to a *ballot* such that the ballot can no longer be read by a machine. Unlike the absentee ballot cure process, the ballot duplication process does not involve the

voter. Rather, bipartisan teams of election officials perform ballot duplication.

How should duplicated ballots be handled in a Risk Limiting Audit (RLA)?

Risk Limiting Audits are to ensure the accuracy of the reported outcome of an election before an election is certified. Therefore, when performing an RLA, the original damaged absentee ballot must be acquired and counted rather than its corresponding duplicated ballot. The original ballot should still be compared to the duplicated ballot to ensure proper duplication occurred. Therefore, when a locality is asking its Clerk of Court for envelopes, the request must include Envelope 5A along with the #3 Envelopes, if that was the method chosen by the locality. Additionally, duplicated ballots captured in a unique Envelope 3 will create a batch for ballot manifest purposes. Duplicated ballots that were placed in the same Envelope 3 as other machine-read ballots would not create a new batch, as the duplicated ballots would be a part of that batch. Please review the RLA Manual for further information regarding the RLA process.

How should duplicated ballots be handled in a recount?

If a recount were to occur in your locality, any absentee ballot “sought to be cast but ruled invalid and not cast in the election” shall not be taken into account for the recount, pursuant to §24.2-802.2.

If duplicated ballots were counted in the election, the duplicated ballot, not the original ballot, should be counted in the recount. The determination of voter intent, i.e., hand-counting ballots, used in recounts is only applicable as prescribed by Va. Code §24.2-802.2.

Determining Voter Intent: Can this vote count?

Use the following vote-marking scenarios when duplicating or hand-counting a ballot to determine if a voter's intent can be determined and captured in the results.

1. Extra Marks

A voter might accidentally make extra pen marks or smudges on their ballot.

- Any ballot marked so that the intent of the voter is clear shall be counted. (Va. Code §24.2-644)
- Count the vote for the mark that stands out and is clearly associated with a candidate.

**Member
House of Delegates
64th District**

Vote for not more than one

☐ Aaron J. Peshkin II (D)

☐ G. Duane Kruse (R)

☒ Davitra Rangel (L)

☐ Jin Chen (I)

☐ Viviana Montoya (I)

#1a



Vote to count

This example contains two marks, but one stands out because it is bold and complete.

This vote is counted for Davitra Rangel.

**Member
House of Delegates
64th District**

Vote for not more than one

☒ Aaron J. Peshkin II (D)

☒ G. Duane Kruse (R)

☐ Davitra Rangel (L)

☐ Jin Chen (I)

☐ Viviana Montoya (I)

#1b



Vote not to count

The voter marked between two candidate names. In this instance, the voter did not clearly indicate their choice.

This vote cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ Aaron J. Peshkin II (D)
- ☐ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)
- ☐ Jin Chen (I)
- ☐ Viviana Montoya (I)

#1c



Vote not to count

The mark is between two names and gives no clear indication of voter's choice.

This vote cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ Aaron J. Peshkin II (D)
- ☐ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)
- ☐ Jin Chen (I)
- ☐ Viviana Montoya (I)

1d



Vote not to count

It is not clear who the voter prefers because the mark is in between candidates

This vote cannot be counted

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ Aaron J. Peshkin II (D)
- ☐ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)
- ☐ Jin Chen (I)
- ☐ Viviana Montoya (I)

#1e



Vote not to count

The mark is between-and touches-two names and gives no clear indication of the voter's choice.

This vote cannot be counted.

2. More than one candidate marked

You may encounter a ballot that contains more than one mark for a vote-for-one contest.

- Any ballot marked so that the intent of the voter is clear shall be counted. (Va. Code §24.2-644).
- If a ballot for an office contains a greater number of votes than permitted, no vote for the office can be counted (Va. Code §24.2-663).
- In a recount, voting for more candidates than permitted is considered an overvote and the vote cannot be counted (Va. Code §24.2-802.2).
- Count the vote for the mark that stands out and is clearly associated with a candidate.

**Member
House of Delegates
64th District**

Vote for not more than one

☒ Aaron J. Peshkin II (D)

☒ G. Duane Kruse (R)

☐ Davitra Rangel (L)

☐ Jin Chen (I)

☐ Viviana Montoya (I)

#2a



Vote to count

This example contains two marks, but one stands out because the box contains an x and is circled.

The vote is counted for Aaron J. Peshkin II.

**Member
House of Delegates
64th District**

Vote for not more than one

☒ Aaron J. Peshkin II (D)

☒ G. Duane Kruse (R)

☒ Davitra Rangel (L)

☒ Jin Chen (I)

☒ Viviana Montoya (I)

#2b



Vote not to count

The voter marked each candidate on the ballot. One candidate was marked with a check while the others are marked with an "X". Each mark has the same weight for choice, and there is no clear indication of voter intent.

The voter marked each candidate, which is an overvote; the vote cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ Aaron J. Peshkin II (D)
- ☒ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)
- ☐ Jin Chen (I)

P. J Roe

#2c



Vote not to count

The voter marked a candidate and wrote the name of a write-in candidate Both are a voter for a candidate.

This vote cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

- ☒ Aaron J. Peshkin II (D)
- ☒ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)
- ☐ Jin Chen (I)
- ☐ Viviana Montoya (I)

#2d



Vote not to count

The voter marked two candidates, when only one is allowed. It is not clear who the voter prefers because both marks the same. No mark stands out for a particular candidate.

This vote cannot be counted.

3. Strikethroughs

Some voters draw lines (also called strikethroughs) across candidate names instead of marking in the oval or box.

- Any ballot marked so that the intent of the voter is clear shall be counted. (Va. Code §24.2-644)
- Strikethroughs mean a voter does not favor a candidate. They don't provide information about voter intent. Often, these votes cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

☐ ~~Aaron J. Peshkin II (D)~~

☐ ~~G. Duane Kruse (R)~~

☐ ~~Davitra Rangel (L)~~

☐ ~~Jin Chen (I)~~

☒ Viviana Montoya (I)

#3a



Vote to count

This voter checked the oval for one candidate and marked out the others.

This vote is counted for Viviana Montoya.

**Member
House of Delegates
64th District**

Vote for not more than one

☐ Aaron J. Peshkin II (D)

☐ G. Duane Kruse (R)

☐ Davitra Rangel (L)

☐ Jin Chen (I)

☐ Viviana Montoya (I)

3b



Vote not to count

The voter marked a line in between two names, and there is no clear indication of the voter's choice.

The vote cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ ~~Aaron J. Peshkin II (D)~~
- ☐ ~~G. Duane Kruse (R)~~
- ☐ ~~Davitra Rangel (L)~~
- ☐ ~~Jim Chen (H)~~
- ☐ Viviana Montoya (I)

#3c



Vote not to count

In this example, 4 candidates are struck out. There is no clear mark that indicates who the voter prefers.

This vote cannot be counted.

4. Mark outside the oval

A voter's mark for a candidate may fall outside the oval or box.

- Any ballot marked so that the intent of the voter is clear shall be counted. (Va. Code §24.2-644)
- Consider whether the mark indicates a preference for a candidate. If the mark is unclear, the vote cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

☒ Aaron J. Peshkin II (D)

☐ G. Duane Kruse (R)

☐ Davitra Rangel (L)

☐ Jin Chen (I)

☐ Viviana Montoya (I)

#4a



Vote to count

In this example, it is clear that the checkmark aligns with a candidate.

The vote is counted for Aaron J. Peskin II.

**Member
House of Delegates
64th District**

Vote for not more than one

☐ Aaron J. Peshkin II (D)

☐ G. Duane Kruse (R) ←

☐ Davitra Rangel (L)

☐ Jin Chen (I)

☐ Viviana Montoya (I)

#4b



Vote to count

In this example, the arrow clearly points to a candidate.

The vote is counted for G. Duane Kruse.

I

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ Aaron J. Peshkin II (D)
- ☐ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)
- ☐ Jin Chen (I)
- ☐ Viviana Montoya (I)

#4c



Vote not count

This mark outside of the oval is not clearly associated with any candidate.

This vote cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ Aaron J. Peshkin II (D)
- ☐ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)
- ☐ Jin Chen (I)
- ☐ Viviana Montoya (I)

#4d



Vote not to count

This mark is not clearly associated with a single candidate.

This vote cannot be counted.

5. Circle-like marks

You may encounter a ballot on which a voter has circled a candidate name, rather than filling in an oval or box to specify their vote.

- Any ballot marked so that the intent of the voter is clear shall be counted (Va. Code §24.2-644).
- Consider whether the mark indicates a preference for a candidate. If it is unclear, the vote cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

☒ Aaron J. Peshkin II (D)

☐ G. Duane Kruse (R)

☐ Davitra Rangel (L)

☐ Jin Chen (I)

☐ Viviana Montoya (I)



Vote to count

In this example, the circle corresponds to a specific candidate.

The vote is counted for Aaron J. Peshkin II.

**Member
House of Delegates
64th District**

Vote for not more than one

☐ Aaron J. Peshkin II (D)

☐ G. Duane Kruse (R)

☒ Davitra Rangel (L)

☐ Jin Chen (I)

☐ Viviana Montoya (I)

#5b



Vote to count

In this example, the circle line touches more than one candidate. The center of the circle closes on one candidate.

The vote can be counted for Davitra Rangel.

Member
House of Delegates
64th District

Vote for not more than one

☐ Aaron J. Peshkin II (D)

☐ G. Duane Kruse (R)

☐ Davitra Rangel (L)

☐ Jin Chen (I)

☐ Viviana Montoya (I)

#5c



Vote not to count

The circle closes around two candidates. The voter's preference cannot be determined.

This vote cannot be counted.

6. Writing words

Voters shall not write words, other than a candidate's name, to indicate preference. Writing words cannot be used to indicate preference.

**Member
House of Delegates
64th District**

This one
Vote for not more than one

☐ Aaron J. Peshkin II (D)

☒ G. Duane Kruse (R)

☐ Davitra Rangel (L)

☐ Jin Chen (I)

☐ Viviana Montoya (I)

6a



Vote to count

In this example, the words “this one” cannot be taken as an indication of preference. However, the voter also drew an arrow, which can be used to indicate the voter's preference for 1 candidate.

The vote is counted for G. Duane Kruse.

**Member
House of Delegates
64th District**

Vote for not more than one

☒ Aaron J. Peshkin II (D)

☒ G. Duane Kruse (R)

☒ Davitra Rangel (L)

☒ Jin Chen (I)

☒ Viviana Montoya (I)

This one



Vote not to count

The voter checked all boxes and wrote “this one” on the ballot. The words “this one” cannot be used as an indication of preference.

Additionally, voter marked each candidate, which is an overvote; the vote cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ ~~my GUY~~ Aaron J. Perlut (D)
- ☐ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)
- ☐ Jin Chen (I)
- ☐ Viviana Montoya (I)

#6c



Vote not to count

The voter only wrote “My Guy” across a candidate’s name. This is not a clear indication that the voter was choosing this candidate for their vote.

This vote cannot be counted.

7. Write-in votes

Voters may choose to write in the name of a candidate not listed on the ballot.

Follow the rules in the election code

- At all elections, except primary elections, a voter may vote for any person other than the listed candidates for the office by writing or hand printing the person's name on the official ballot. No check or other mark shall be required to cast a valid write-in vote.
§24.2-644(C)
- No write-in vote shall be counted for an office for any person whose name appears on the ballot as a candidate for that office.
§24.2-644(D)

**Member
House of Delegates
64th District**

Vote for not more than one

☐ Aaron J. Peshkin II (D)

☐ G. Duane Kruse (R)

☐ Davitra Rangel (L)

☒ Write-In
P.J. Roe

#7



Vote to count

The voter wrote the name and filled in the oval to indicate that this is their choice.

The vote is counted as a write-in for P.J. Roe.

**Member
House of Delegates
64th District**

Vote for not more than one

☐ Aaron J. Peshkin II (D)

☐ G. Duane Kruse (R)

☐ Davitra Rangel (L)

☐ Jin Chen (I)

X P.J. Roe

#7a



Vote to count

The voter wrote in the name and created a mark to indicate that this is their choice.

The vote is counted as a write-in vote for P.J. Roe.

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ Aaron J. Peshkin II (D)
- ☐ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)
- ☐ Jin Chen (I)

P.J. Roe

#7b



Vote to count

The voter clearly indicated their voting preference.

No check or other mark shall be required to cast a valid write-in vote. §24.2-644(C)

The vote is counted as a write-in vote for P.J. Roe.

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ Aaron J. Peshkin II (D)
- ☐ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)
- ☐ Write-In

AARON J PESHKIN II

#7c



Vote not to count

The voter indicated their choice; however, their choice is already printed on the ballot.

No write-in vote shall be counted for an office for any person whose name appears on the ballot as a candidate for that office. §24.2-644(D)

This vote cannot be counted.

**Member
House of Delegates
64th District**

Vote for not more than one

- ☐ Aaron J. Peshkin II (D)
- ☐ G. Duane Kruse (R)
- ☐ Davitra Rangel (L)

☒ Write-In
Peshkin

#7d



Vote not to count

The voter indicated their choice with the last name of the candidate; however, their choice is already printed on the ballot.

No write-in vote shall be counted for an office for any person whose name appears on the ballot as a candidate for that office. §24.2-644(D)

This vote cannot be counted.

Member
House of Delegates
64th District

Vote for not more than one

☒ Aaron J. Peshkin II (D)

☐ G. Duane Kruse (R)

☐ Davitra Rangel (L)

☐ Write-In

P.J. Roe

#7e



Vote not to count

The voter marked a selection and wrote down a name. This indicates two choices, more than what is permitted for this contest.

If voter indicate a number of choices for a race in which is not permitted they have made an overvote and no vote shall be counted. §24.2-802.2

This vote cannot be counted.

8. Ranked Choice Votes

Pursuant to § 24.2-673.1 of the Code of Virginia, the State Board of Elections promulgated 1VAC20-100-40, which sets forth standards for ballot treatment in ranked choice elections for scenarios in which a voter completes their ballot in a manner inconsistent with given instructions. This section provides a visual guide for those scenarios and how they are resolved.

The examples in this section presume the ability to determine the intent for each choice. If there is uncertainty about whether a voter intended to make a choice, the preceding sections will serve as a guide to make determinations of intent. This section shall control for purposes of ranked choice votes in the event of a conflict with the preceding sections. .

In the following examples, keep in mind that only first-choice rankings may be applied in the first-choice ranking tabulation round. 1VAC20-100-50(A).

Ranked choice Overvote: More than one candidate assigned same ranking

MAYOR (4 year term)	Vote 1 st Choice Here	Vote 2 nd Choice Here	Vote 3 rd Choice Here	Vote 4 th Choice Here	Vote 5 th Choice Here
Thomas Jefferson	☒	☐	☐	☐	☐
Benjamin Franklin	☐	☒	☐	☐	☐
Alexander Hamilton	☐	☒	☐	☐	☐
John Adams	☐	☐	☒	☐	☐
Write in: _____	☐	☐	☐	☐	☐

In the case of a ranked choice overvote for a ranking on a ballot, the ranking shall not be counted in any round and the next valid ranking shall be counted in all rounds except the first-choice ranking tabulation. 1VAC20-100-40 A 1.

Votes are invalid for a ranking assigned to multiple candidates. In this example, the first-choice vote would be applied in the first-choice ranking tabulation round. If the first-choice candidate is eliminated in a subsequent round, the second-choice overvotes would be invalid and the third-choice vote would be valid.

Duplicate Ranking: Voter assigned one candidate multiple rankings

MAYOR (4 year term)	Vote 1 st Choice Here	Vote 2 nd Choice Here	Vote 3 rd Choice Here	Vote 4 th Choice Here	Vote 5 th Choice Here
Thomas Jefferson	☐	☒	☐	☐	☐
Benjamin Franklin	☐	☐	☐	☐	☒
Alexander Hamilton	☐	☐	☐	☒	☐
John Adams	☒	☐	☒	☐	☐
Write in: _____	☐	☐	☐	☐	☐

In the case of a duplicate ranking for an active candidate, only the voter's highest ranking for the candidate shall be counted. Valid rankings after a duplicate ranking shall be counted. 1VAC20-100-40 A 2.

In this example, the voter's highest ranking for John Adams is valid. The third-choice vote for John Adams is not valid. If the voter's first- and second-choice candidates are eliminated, the fourth-choice ranking would be applied.

Skipped Ranking #1: One ranking skipped

MAYOR (4 year term)	Vote 1 st Choice Here	Vote 2 nd Choice Here	Vote 3 rd Choice Here	Vote 4 th Choice Here	Vote 5 th Choice Here
Thomas Jefferson	☐	☐	☒ 	☐	☐
Benjamin Franklin	☒ 	☐	☐	☐	☐
Alexander Hamilton	☐	☐	☐	☐	☐
John Adams	☐	☐	☐	☐	☐
Write in: _____	☐	☐	☐	☐	☐

In the event of a ballot with a skipped ranking, the next valid ranking shall be counted, except in the first-choice tabulation round. 1VAC20-100-40 B 1.

If only one ranking skipped, next valid vote to count. In this example, first-choice and third-choice votes are valid.

Skipped Ranking #2: More than one ranking skipped

MAYOR (4 year term)	Vote 1 st Choice Here	Vote 2 nd Choice Here	Vote 3 rd Choice Here	Vote 4 th Choice Here	Vote 5 th Choice Here
Thomas Jefferson	☐	☐	☐	☐	☐
Benjamin Franklin	☐	☐	☐	☐	☐
Alexander Hamilton	☐	☐	☐	☐	☐
John Adams	☐	☐	☒ 	☐	☐
Write in: _____	☐	☐	☐	☐	☐

In the event the ballot reaches two consecutive skipped rankings, the ballot will be considered an inactive ballot. 1VAC-20-100-40 B 2.

Vote after two consecutive skipped rankings not to count. In this example, the third-choice vote is not valid.

Please note: Pursuant to 1VAC20-100-10, “skipped ranking” is when a voter has left a ranking unassigned but validly ranks a candidate at a subsequent ranking. A round in which a voter has made a choice deemed invalid is not a “skipped ranking” (e.g., an overvote followed by a skipped ranking does not count as two consecutive skipped rankings).

Appendix

A. Example tracking logs/sheets

- Example of a team log (new log each day):

Precinct:	CAP		
Team:	A: Jackson F and Felicia S		
Process Date:	11/03/26		
Ballot Unique Identifiers			
12-110326-A-001		12-110326-A-004	
12-110326-A-002			
12-110326-A-003			
Total Ballots Processed		4	
Team Member 1 Signature:		Jackson Forest	
Team Member 2 Signature:		Felicia Sampson	

- Example of a precinct sheet:

Precinct:	Provisional			
Process Date	Team Name	Team Member 1	Team Member 2	# of Ballots Duplicated
11/12/26	1	Susan G	Sammy B	1
11/12/26	2	Andi K	Carol V	0

- Example of a locality-wide sheet:

Process Date	Precinct	# of Ballots Duplicated
11/03/26	304	38
11/03/26	307	27

B. Damaged\Unreadable Ballot Duplication Log

County\City of:	Universal	Precinct:	Central Absentee
Election:	11/3/2026 General and Special	Team Member 1:	Republican EB Member
Process Date:	11/03/2026	Team Member 2:	Democratic EB Member
		Team Name:	Duplication Team (DT)
A. Total # of Duplicated Ballots	6	B. Total # of ABs to Process:	909
Unique Ballot Identifiers			
1. 201-110326-DJ-01		5. 623-110326-DJ-05	
2. 515-110326-DJ-02		6. 402-110326-DJ-06	
3. 111-110326-DJ-03			
4. 315-110326-DJ-04			
Total Number of Absentee Envelopes to be Processed (Total of A and B Above):	915		
Public Count at the Start of the Day:	377		
Public Count at the end of the Day:	1292		
Difference:	915		
Total Ballots Processed:	915		
Duplication Team Member 1 Signature:	<i>Republican Electoral Board Member One</i>		
Duplication Team Member 2 Signature:	<i>Democratic Electoral Board Member Two</i>		

Number of Original Damaged Ballots Sealed in Envelope 5A:	
6	
Number of Counted Ballots Sealed in Envelope 3:	915
CAP Chief Officer's Signature:	
CAP Deputy Chief Officer's Signature:	



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SBE Advisory Opinion #1 regarding the personal use of campaign funds.

BOARD WORKING PAPERS
Kayla Soltis
ELECT Policy Analyst



★ VIRGINIA ★
DEPARTMENT *of* ELECTIONS

Memorandum

To: Chairman O'Bannon, Vice-Chair Dance, Secretary Alvis-Long, Dr. Christopher Stolle, and Dr. Sally Hudson
From: Kayla Soltis, Senior Policy Analyst and Data Privacy Advisor
Date: September 15, 2026
Re: Advisory opinion request #1

Proposed Motion

"Pursuant to its authority under Virginia Code § 24.2-948.8, I move that the State Board of Elections adopt the proposed advisory opinion and its holdings and conclusions."

Applicable Code Sections

Va. Code §§ 24.2-948.6. Use of campaign funds and 24.2-948.8. Advisory opinions.

Background

The 2025 session of the Virginia General Assembly passed into law 2025 Acts of Assembly chapters 535 and 537. These established Va. Code §§ 24.2-948.6 and 24.2-948.8. Pursuant to Va. Code § 24.2-948.8, any person subject to the provisions of § 24.2-948.6 may submit a complete written advisory opinion request (AOR or the "request") regarding the application of § 24.2-948.6 to a specific transaction or activity. The State Board will issue a written advisory opinion within 60 days of receipt of the AOR.

The instant AOR#1 was submitted on behalf of Phil for VA, Campaign Committee-22-000017, on August 10, 2026. The request states as follows:

"Mr. Hernandez, in his role as Delegate, is running a community engagement drive to collect design proposals of a specialty license plate celebrating Ocean View, a historic community in Norfolk. Submissions will be collected until September 15 and a selection committee will decide which design is the winner. That design will then be used for the eventual [specialty] plate after Del. Hernandez carries legislation to create the plate in January of 2027. Mr. Hernandez would like to award the winning design artist with \$1000. In light of the new campaign finance laws, we are seeking an [advisory] opinion from the Board before making this potential award public. Please advise if this would be acceptable under the new law."

The AOR was posted on the Department of Elections website on August 10, 2026, and on Virginia's Regulatory Town Hall on August 18, 2026, and comment was solicited from interested parties. However, no comments were received with respect to this AOR.

Having considered the relevant laws, regulations, and policies, this draft advisory opinion was prepared for consideration and adoption at the Board's discretion. If the Board does not adopt the opinion, then its members may meet in a closed session to further discuss the AOR. In any case, the Board will issue the opinion timely and in compliance with the requirements of Va. Code §§ 24.2-948.8 and 2.2-3700 *et seq.*

Recommendation

ELECT staff recommends that the State Board of Elections adopt the proposed motion above.

Richmond, Virginia 23219

September 15, 2026

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION REQUEST AOR #1
ADVISORY OPINION AO#1

Dan Harner
Office of Del. Phillip Hernandez
P.O. Box 8927
Norfolk, VA 23503

Dear Mr. Harner:

We are responding to your advisory opinion request (AOR) on behalf of Phil for VA (the “Committee”) regarding the application of Va. Code § 24.2-948.6, concerning the use of campaign funds. Specifically, your request concerns whether utilizing campaign funds to finance and conduct a competition to design a specialty license plate commemorating a local historic community, which would award the creator of the winning design \$1,000 in prize money, would constitute prohibited personal use of campaign funds.

The State Board of Elections (“The Board”), having considered the relevant facts and law, issues this advisory opinion pursuant to the Board’s authority under Va. Code § 24.2-948.8. Accordingly, the Board concludes that the Committee’s proposed use of campaign funds would not be prohibited under Va. Code § 24.2-948.6, because both the contest and the award constitute “a political or officially connected expense to the extent the expense is an expenditure that is provided for under Virginia law or an ordinary and necessary expense incurred in connection with the duties of an officeholder.”¹ The proposed specialty license plate contest would be held in honor of a historic community in the officeholder’s (the “Delegate’s”) district, for residents of the Delegate’s district, as part of a community engagement drive. Additionally, the \$1,000 prize would be rewarded based on the merits of the design and is an ordinary expense as it closely resembles the usual and normal compensation for a service provided- in this case designing a specialty license plate. Further, the Delegate intends to sponsor the winning design as a legislative proposal as part of the General Assembly session in 2027, undoubtedly a routine duty of a state legislator. It should be noted that the Board has considered only the facts as stated in

¹ Prohibited Personal Use of Campaign Funds (2026) 1VAC 20-90-50.
<https://townhall.virginia.gov/L/ViewAction.cfm?actionid=6888>

the AOR. Additional facts or materially relevant omissions to the questions posed could change the permissibility of using campaign funds on the contest or the prize.

Questions Presented

For the purposes of Va. Code § 24.2-948.6:

1. May the Committee use campaign funds to finance and conduct a competition to select a design for a specialty license plate for the purpose of sponsoring that commemorative license plate design in a legislative proposal?
2. May the Committee use campaign funds to award the winner of said competition, selected by a committee of judges based on the merits of the design, \$1,000?

Background

On August 10, 2026, the Committee submitted an AOR² (the “request” or “AOR”) asking the Board to advise whether the following activity would be a prohibited personal use of campaign funds:

“Mr. Hernandez, in his role as Delegate, is running a community engagement drive to collect design proposals of a specialty license plate celebrating Ocean View, a historic community in Norfolk. Submissions will be collected until September 15 and a selection committee will decide which design is the winner. That design will then be used for the eventual [specialty] plate after Del. Hernandez carries legislation to create the plate in January of 2027. Mr. Hernandez would like to award the winning design artist with \$1000. In light of the new campaign finance laws, we are seeking an [advisory] opinion from the Board before making this potential award public. Please advise if this would be acceptable under the new law.”

The Board posted the AOR publicly on August 19, 2026, and solicited comments from interested parties. No comments were received.

The Board met on September 15, 2026, to consider the underlying issues of fact and law. By a vote of e.g. 4-1, 3-2, the Board concluded that the proposed use of campaign funds to finance and conduct a competition to select a design for a license plate for the purpose of sponsoring the winning design in a legislative proposal would not violate the provisions of Va. Code § 24.2-948.6. By a vote of e.g. 4-1, 3-2, the Board concluded that the proposed use of campaign funds to award the winner of said competition, selected by a panel of judges based on the merit of the design, \$1,000 would not violate the provisions of Va. Code § 24.2-948.6.

² Prohibited Personal Use of Campaign Funds Advisory Opinion Request #1 (2026).
<https://townhall.virginia.gov/L/ViewNotice.cfm?GNid=3447>

Discussion

Va. Code § 24.2-948.6 identifies seven categories of permissible uses of contributions accepted by a candidate or his campaign committee: (1) for otherwise authorized expenditures in connection with the candidate's campaign; (2) for ordinary and necessary expenses incurred in connection with the duties of the individual as an officeholder; (3) for contributions to any organization described in § 170(c) of the Internal Revenue Code; (4) for transfers to any federal, state, or local political party committee; (5) for contributions to federal, state, and local candidates subject to the provisions of prevailing law; (6) for dependent care expenses that are incurred as a direct result of the person's seeking, holding, or maintaining public office; or (7) for any other lawful purpose unless prohibited by subsection B of Va. Code § 24.2-948.6.

In the case of this request, the two proposed expenditures must be separated to evaluate them properly. First, the Committee proposes spending campaign funds for the contest itself, including any capital required to conduct the contest. Second, in addition to the cost of the contest, the Committee proposes awarding the creator of the winning design with a prize of \$1,000. This prize must be considered a distinct expenditure, as a monetary prize is not strictly required to conduct such a contest.

May the Committee use campaign funds to finance and conduct a competition to select a design for a specialty license plate for the purpose of sponsoring that commemorative license plate design in a legislative proposal?

The first proposed use of funds, the license plate design contest, is intended to serve as part of a community engagement drive conducted by the Delegate in celebration of a historic community, Ocean View, located within the district the Delegate represents. A cursory examination of local sources suggests that Ocean View has been the subject of ongoing revitalization efforts.^{3 4 5} It is reasonable that an officeholder would want to celebrate Ocean View's historical significance and recent revitalization through a community engagement event, such as the proposed contest. Creating such community engagement events and stakeholder outreach are routine officeholder duties, and this case is no exception.

Further, the Delegate will likely carry the winning design through the General Assembly: a core duty of the officeholder.⁶ As such, should the Delegate carry the winning design to the 2027 session as its patron, this would be an ordinary element of the Delegate's job duties. Thus,

³ Ocean View Beach Park Expansion Project. City of Norfolk, Virginia - Official Website. (n.d.).

<https://www.norfolk.gov/6203/Ocean-View-Beach-Park-Expansion-Project>

⁴ Delesline, N. (2019, July 27). New Year will bring major redevelopment to Ocean View.

<https://www.pilotonline.com/2018/12/26/new-year-will-bring-major-redevelopment-to-ocean-view-2/>

⁵ Vargas, A. (2022, November 30). Next steps for Norfolk's Ocean View Revitalization Project in the works | 13newsnow.com. 13 News Now. <https://www.13newsnow.com/article/news/local/mycity/norfolk/norfolks-ocean-view-revitalization-project/291-99560318-9070-4500-90ea-811b99e36581>

⁶ Create a Plate Guidelines (2026.) Virginia Department of Motor Vehicles.

<https://www.dmv.virginia.gov/vehicles/license-plates/plate-develop>

both the proposed purpose of the contest, and any subsequent proposed license plate design legislation, would fit the definition of a permitted campaign expense, as a use of campaign funds “for a political or officially connected expense to the extent the expense is an expenditure that is provided for under Virginia law or an ordinary and necessary expense incurred in connection with the duties of an officeholder.”⁷

May the Committee use campaign funds to award the winner of said competition, selected by a committee of judges based on the merits of the design, \$1,000?

For the question of the proposed prize, several key elements of the advisory opinion request suggest that this expenditure would not be a prohibited personal use of campaign funds. The Delegate has proposed that a committee of judges select the winning design based on its merits, rather than at random. This prevents the contest from resembling a raffle or lottery, and instead suggests the prize is fulfilling a role closer to compensation for the individual who submits the winning entry for the use of their design. Compensating this individual for their labor and design in service of the officeholder would not be considered a personal use of campaign funds if the labor is directly related to the routine duties of the office and that labor would not occur outside of the Delegate’s duties as an officeholder, as it seems here.

In order to be considered a permissible use of campaign funds, payments for goods and services must not be excessive. Specifically, such payments must not exceed the “usual and normal” charge for a good or service, defined as “the hourly charge for the same or similar goods or services at a commercially reasonable rate at the time the services were rendered.”⁸ Should the payment surpass that usual and normal threshold, any additional amount would then be considered personal use and could not be paid with campaign funds.

Considering this AOR, similar publicly advertised design contests offer prizes as compensation for the labor of the winning designer or design team, and many of those contests offer prizes of similar monetary value to the \$1,000 prize described in this AOR.^{9 10 11} Therefore, the \$1000 prize is a usual and normal charge and is not a prohibited personal use of campaign funds.

Holding

⁷ Va. Code § 24.2-948.6 and Personal Use of Campaign Funds (2026) 1VAC 20-90-50(4). <https://townhall.virginia.gov/L/ViewAction.cfm?actionid=6888>

⁸ Va. Code § 24.2-948.6 and Prohibited Personal Use of Campaign Funds (2026) 1VAC 20-90-50(A). <https://townhall.virginia.gov/L/ViewAction.cfm?actionid=6888>

⁹ See *Artists Magazine Annual art competition*. Artists Network. (2026, June 19). <https://www.artistsnetwork.com/art-competitions/artists-magazine-annual/?srsltid=AfmBOokwEcD2ss35-XwHf3wp-71TTGsmSjinolHci5BVgjy8ZNhesc>

¹⁰ See *Bienenstock furniture and Interior Design Competition winners*. Bienenstock Furniture Library. (2026, March 11). <https://www.furniturelibrary.com/academics/competition-winners/>

¹¹ See *Nisod Student Design Contest*. NISOD. (2026, May 13). <https://www.nisod.org/membership/student-graphic-design-contest/>

Having considered the relevant facts and law, the Board holds that: (1) using campaign funds to finance and conduct a competition to select a design for a specialty license plate for the purpose of sponsoring that commemorative license plate design in a legislative proposal would not be a prohibited personal use of campaign funds and (2) using campaign funds to award the winner of said competition \$1,000, selected by a committee of judges based on the merits of the design, would not be a prohibited use of campaign funds.

This advisory opinion addresses only whether the activity described in the accompanying AOR would qualify as prohibited personal use of campaign funds under Va. Code § 24.2-948.6 and its appurtenant regulations and policies. This opinion does not address whether the underlying activity is lawful under any other state, federal, or local laws. Further, this advisory opinion is not an endorsement of the underlying activity.

This advisory opinion may be relied upon by any person involved in the transaction or activity described herein or involved in a materially indistinguishable transaction or activity.¹² Any such individual who acts in good faith in accordance with the findings of this advisory opinion shall not, as a result of such act, be subject to any sanction provided under Va. Code § 24.2-948.6.¹³ However, this opinion should not be relied upon regarding activities or transactions that are materially different from those discussed herein.

On behalf of the State Board of Elections

(signed)

Chairman

¹² Va. Code 24.2-948.8 (D).

¹³ Va. Code 24.2-948.7.



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STATE BOARD *of* ELECTIONS

2027 Locality Elections Security Standard (LESS)

BOARD WORKING PAPERS

Brandon Smith
Chief Technology Officer



★ VIRGINIA ★
STATE BOARD *of* ELECTIONS

Memorandum

To: Chairman O'Bannon, Vice Chair Dance, Secretary Alvis-Long, Dr. Christopher Stolle, and Dr. Sally Hudson

From: Virginia Voter Registration System Security Advisory Workgroup (VRSS)

Date: September 15, 2026

Re: 2027 Locality Election Security Standards (LESS)

Overview

Under the Code of Virginia §24.2-410.2, the State Board of Elections is required to promulgate regulations and standards necessary to ensure the security and integrity of the Virginia voter registration system and supporting technologies used by the counties and cities to maintain and record registrant information. Further, the Board, in consultation with representatives of local government information technology professionals and general registrars, must update the security standards annually prior to November 30th. The Board has previously approved the Locality Election Security Standards (LESS) to comply with this requirement. The proposed 2027 Locality Election Security Standards represent an ongoing collaborative effort that includes input from general registrars, city and county information technology leadership, and ELECT staff who have a wide range of expertise in election management, information technology, and cybersecurity.

Background

The purpose of the Locality Election Security Standards is to ensure that each county and city meet election security standards designed to maintain the security and integrity of the Virginia voter registration system and supporting technologies through appropriate security controls, policies, practices and procedures. To help all localities work toward improving their cybersecurity stance, the Virginia Voter Registration System Security Advisory Group (VRSS) works to make limited changes focusing on efficiency, to the standards which localities can use to meet baseline requirements.

Recommendation

ELECT staff recommends the adoption of the 2027 Locality Election Security Standards which maintains the previously approved 2026 Locality Election Security Standards with no suggested revisions at this time.

“I move that the State Board of Elections adopt the 2027 Locality Election Security Standards effective December 1, 2026.”

Applicable Code Sections

§24.2-410.2 Security of the Virginia voter registration system.



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DEPARTMENT *of* ELECTIONS

2027 LOCALITY ELECTION SECURITY STANDARDS (LESS)

**Voter Registration System Security (VRSS) Advisory Group
Virginia Department of Elections
Virginia State Board of Elections**

Version Number: 8



Document Control

Year	Updates
2026	This year the Voter Registration System Security Advisory Group (VRSS) recommends no changes.
2025	This year, the Voter Registration System Security (VRSS) Advisory Group focused on further refining the Locality Election Security Standards content for better clarity. The Tools and Resources Matrix document was combined with the LESS checklist to eliminate one of the LESS documents and make the tools and resource materials more readily available to the localities. Additionally, four controls were eliminated from the checklist. In summary, these updates continue to streamline the LESS requirements, ensure consistent language, and improve localities' compliance by minimizing potential misunderstandings.
2024	This year, the VRSS Advisory Group focused on refining the LESS content for better clarity. The VRSS and ELECT worked to ensure localities would more easily understand the LESS requirements by standardizing terminology and creating a glossary. In summary, these updates streamline the LESS requirements, ensure consistent language, and improve localities' compliance by minimizing potential misunderstandings.
2023	This year, the VRSS Advisory Group sought to recommend as few changes as possible to the LESS and instead focus on improving locality infrastructure through trainings with locality IT staff to support local administrators during the ongoing election season. The VRSS and ELECT worked to develop multiple resources tailored to the LESS and Commonwealth of Virginia (COV) localities, including templates and guides on role-based training, incident reporting and review, patch management, privacy training for elections officials, vulnerability scanning remediation frequency, system categorization, and baseline configuration.
2022	The VRSS Advisory Group annually reviews and recommends updates to the LESS in advance of the SBE's annual review in November. To prepare recommendations for the SBE, the VRSS Advisory Group met over a dozen times between June and October 2022 to write a revised, simplified, and re-structured set of standards and controls. The VRSS reduced 22 standards and 441 controls to a streamlined, prioritized, and mapped maturity path composed of 14 control families and 165 individual controls. To assist localities in identifying the top priorities for their security posture, the VRSS identified three maturity paths. Localities within the Commonwealth must comply with the controls identified as Baseline, the lowest maturity path, but may choose to implement additional controls as their locality election security posture strengthens. Each locality is required to submit an accurate report of its compliance with LESS by March 1 of each year. Additionally, by April 1, each locality must submit a formal remediation plan for any Baseline controls that it cannot meet. To further assist localities in organizing the resources needed to implement these controls, we organized the 14 control families into three types of security controls: physical and administrative, organizational, and technical. Within the LESS, they are designated as GR 1-6, ORG 7, and TECH 8-14. - GR 1-6 are physical and administrative controls. Physical controls address



	process-based security needs using physical hardware devices, such as a badge reader, architectural features of buildings and facilities, and specific security actions taken by people. Administrative controls (also known as managerial controls) are directives, guidelines or advisories aimed at the people within the organization. For the purpose of elections security, the local General Registrar (GR) typically controls the physical spaces in which elections systems, equipment and personnel operate, and the policies and procedures followed by elections staff-members. These are controls that mostly fall within the ability of the GR to implement. Some support from locality IT staff, and prioritization from local governing bodies and administrators will still be required. - ORG 7 is an organizational control (formerly LESS Organizational controls known as Contingency Planning, Security Planning, Program Management, Policy and Procedure, and Security and Acceptable Use). Organizational controls in the elections context are security controls that require the involvement of locality leadership and technology personnel. These include organizational planning such as disaster recovery, organizational contingency plans, systems security plans, and locality-wide acceptable use policies, for example. TECH 8-14 are technical controls. Technical controls (also called logical controls) are security controls that computer systems and networks directly implement. A local General Registrar will likely need assistance from technology professionals to implement these controls. Examples include access control, system audit logs, and configuration management.
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QUICK START GUIDE

BACKGROUND

The Code of Virginia § 24.2-410.2(A) instructs the State Board of Elections (SBE) to “promulgate regulations and standards necessary to ensure the security and integrity of the Virginia voter registration system and the supporting technologies utilized by the counties and cities to maintain and record registrant information. The SBE shall, in consultation with representatives of local government information technology professionals and general registrars, update the security standards at least annually. Such review shall be completed by November 30 each year.”

The law (Code of Virginia § 24.2-410.2(B)) requires each locality electoral board to “develop and annually update written plans and procedures to ensure the security and integrity of those supporting technologies. All plans and procedures shall be in compliance with the security standards established by the SBE pursuant to subsection A. Each electoral board shall report annually by March 1 to the Department of Elections (ELECT) on its security plans and procedures.” To maintain access to the Virginia Voter Registration System, localities must follow the SBE adopted Locality Election Security Standards (LESS). Prior to restricting access to the Virginia voter registration system, ELECT must provide notice to the locality of the failure to comply with the required standards or the required reporting on compliance with those standards and allow the locality seven days to correct deficiencies.

A locality has until March 1 annually to submit its report on compliance with the LESS, and until April 1 to submit its full Remediation Plan in compliance with the Locality Election Security Standards GR 4 (Locality Election Security Standards Annual Audit). As per § 24.2-410.2, any record or meeting, the release of which would compromise the security of elections, shall be confidential and are prohibited from release. This includes records regarding locality security, compliance, penetration tests, and remediation planning. These records must be encrypted if provided electronically to an authorized individual.

REMEDIATION PLAN

If your locality does not meet all standards and controls designated as Baseline, the local Electoral Board (EB) must submit a Remediation Plan to ELECT by April 1.

All localities must meet the controls identified as Baseline. If a locality does not meet a Baseline controls, it must provide a remediation plan to include:

- The standard/control that is not met
- The locality's plan for remediation
- The person or people or organizational resources required to remediate
- Signature from local electoral board members (two of three are required)
- Signature of acknowledgement from city or county administrator



ROLES AND RESPONSIBILITIES

SBE, ELECT, and VRSS Advisory Group

- As per the Code of Virginia §24.2-410.2 the SBE shall, in consultation with representatives of local government information technology professionals and general registrars, update the security standards at least annually. Such review shall be completed by November 30 each year.

Locality Governing Body

- As per §24.2-111, “Each local governing body shall pay the reasonable costs of ... conducting elections as required by this chapter”, to include allocating the funds necessary to meet requirements in the Code of Virginia §24.2-410.2, regarding security standards approved by the State Board of Elections to ensure the security of the Virginia voter registration system and supporting technologies.

Electoral Board

- The local EB is accountable and responsible for adherence to and reporting on the Locality Election Security Standards.
- As per §24.2-410.2, the local EB is responsible for reporting annually to ELECT regarding compliance with LESS. The local EB is also responsible for submitting exception requests to ELECT.
- The local EB is also responsible for liaising with the local governing body to ensure the funding of sufficient IT resources to comply with LESS, as well as to resolve any disputes that arise between the local EB and locality IT resources.

General Registrar

- The local General Registrar (GR) is responsible for being familiar with and supporting the local EB in the implementation of the LESS.
- For localities with internal IT resources, the GR, upon request by the local EB, may liaise with locality personnel on behalf of the EB. Issues related to compliance with the LESS should be raised to the attention of the local EB Chair and then addressed with the appropriate supervisor or manager responsible for locality IT. Issues that persist should be brought back to the local EB in a formal meeting and handled by the local EB.
- For localities without internal information technology resources, the GR, upon request by the local EB, may identify any existing contracts or arrangements the locality has made for the provision of IT resources. The GR should bring this information before the local EB in a formal meeting, so that the EB may take further action as necessary to secure locality funding and support.



GR 1 – SECURITY AWARENESS TRAINING

BACKGROUND

According to the 2024 Verizon Data Breach Investigations Report, 74% of data breaches are caused by human errors such as falling for phishing emails, weak passwords, or accidental data leaks. GR 1 outlines the requirements to develop and implement Security Awareness Training (SAT) programs to lower the risk posed by staff working in the local elections office (Election Staff) and implement role-based security training for locality information technology roles.

When assigning role-based training, localities should determine the appropriate training for individuals based on their roles and responsibilities, the specific security requirements of the locality, and the information systems they have access to. Suggested roles include system administrator, systems support professional, database administrator, security analyst, network administrator, software developer, security engineer, cloud architect, information security manager or help desk staff member who interacts with infrastructure and technology supporting the elections office completes appropriate role-based security training. The Locality Security Tools and Resources document outlines what role-based training is, explains how it is different from regular user security awareness training, and provides a chart of suggested trainings.

SCOPE

GR 1 applies to users with access to Sensitive Systems.

MATURITY MATRIX

GR 1 –Security Awareness Training	Baseline	Preferred	Platinum
1. Security Awareness Training	All	All	All
2. Role-Based Security Training	All	All	All
3. Training Records	3.1	3.1	All

1 Security Awareness Training

- 1.1 All Election Staff in the roles Locality Admin, VVRS PII, VVRS User comply with 1 VAC 20-20-90, which requires Security and Awareness Training to maintain access to the Virginia Voter Registration System. Localities enrolled in the ELECT SAT program comply with standards 1.1.

2 Role-Based Security Training

- 2.1 Your locality provides role-based training to information technology professionals with access to Sensitive Systems.

3 Training Records

- 3.1 Maintain training records for Elections Staff for at least two years. The records capture the name of the trainee, trainee role/access, completion date of training, and the name of training. Localities enrolled in the ELECT SAT program comply with standard 3.1.
- 3.2 Your locality security awareness training program is documented, monitored, tested, and reviewed for improvement annually and for compliance with current ELECT VERIS access and SAT requirements.



GR 2 – INCIDENT RESPONSE

BACKGROUND

Incident response is the effort to quickly identify an attack (data breach, ransomware, malware infection, etc.), minimize its effects, contain damage, and remediate the cause to reduce the risk of future incidents. The purpose of GR 2 is to ensure Election Staff can recognize signs of a potential cyberattack and know how and what to report, and that the locality has a response plan outlining the steps to take in the event of a cyberattack.

Localities should document and implement incident response plans and procedures, train users to identify and report suspicious activity, periodically test incident response capabilities, and report incidents to the Virginia Fusion intelligence Center as required by § 2.2-5514. Refer to the Locality Security Tools and Resources for incident response resources and templates.

SCOPE

GR 2 applies to Sensitive Systems.

MATURITY MATRIX

GR 2 – Incident Response	Baseline	Preferred	Platinum
1. Incident Reporting	1.1	All	All
2. Incident Response	2.1	2.1-2.3	All
3. Incident Preparedness	3.1	3.1-3.2	All

1 Incident Reporting

- 1.1 The Voter Registration Office has an incident reporting procedure to ensure potential cybersecurity incidents are reported appropriately.
- 1.2 The Voter Registration Office's incident reporting procedure defines reportable incidents and outlines how to report the incident internally for further action.

2 Incident Response

- 2.1 Election Staff have a current and accurate reference guide for immediate mitigation procedures, including specific instructions based on information security incident type, particularly when and whether to shut down or disconnect affected IT systems.
- 2.2 The Voter Registration Office's incident plan provides contact information for incident response support resources such as your locality InfoSec, IT or systems support, or the Fusion Center for assistance handling security incidents.
- 2.3 The Voter Registration Office's plan outlines incident handling capability for real-time incident management including preparation, detection and analysis, containment, eradication, and recovery.
- 2.4 The Voter Registration Office's plan requires a post-incident review to incorporate lessons learned from the incident into training and process documentation.

3 Incident Preparedness

- 3.1 Election Staff are provided training regarding how to detect potential cybersecurity incidents such as the below.
 - 3.1.1 Unusual files, applications, or services that cannot be accessed.



- 3.1.2 Locked accounts or the passwords changed unknowingly.
- 3.1.3 Files or software have been deleted or installed, or the contents have been changed without user involvement.
- 3.1.4 Suspicious pop-ups load when you access the internet, or unknown files or programs appear.
- 3.1.5 Slower than normal internet speeds due to a spike in network traffic (or computers “hang” or crash).
- 3.1.6 Files have been unexpectedly encrypted, blocking access to them.
- 3.1.7 Programs running, turning off or reconfiguring themselves.
- 3.1.8 Emails sent automatically without the user’s knowledge.
- 3.1.9 No control over the functions of the computer (e.g., in instances whereby device can be controlled remotely, or computer gets locked and displays messages coaxing users into paying a ransom).
- 3.1.10 Requests for credentials
- 3.2 Incident response training occurs annually for locality personnel responsible for a role in incident response or incident management.
- 3.3 Incident Reporting Procedure has been reviewed and updated, as well as distributed to all Election Staff, in the last calendar year.
- 3.4 Incident Response Plan has been reviewed and updated, as well as distributed to all Election Staff, in the last calendar year.

GR 3 – RISK ASSESSMENT

BACKGROUND

Risk assessments help identify, prioritize, and mitigate risk to Election Records and Sensitive Systems. GR 3 requires localities to inventory assets, look for vulnerabilities, and identify the security risk level of Sensitive Systems.

Localities and their administration officials must identify the potential adverse impacts on the locality's operations, assets, and individuals if election information and systems are compromised through a loss of confidentiality, integrity, or availability. Risk assessments must consider risk from external parties such as service providers or contractors that operate information systems on behalf of the locality.

Localities must maintain an information asset inventory or management system that categorizes systems according to the data stored, transmitted, or processed.

Localities should conduct vulnerability scans of all Sensitive Systems. The frequency and comprehensiveness of vulnerability scans should be determined by the security risk level. Localities should ensure that their vulnerability scanning procedures are comprehensive and that they cover all potential sources of vulnerabilities. This includes scanning for patch levels, functions, ports, protocols, and services that should not be accessible, and improperly configured or incorrectly operating information flow mechanisms. By conducting regular vulnerability scans, localities can identify and address security vulnerabilities before they are exploited by attackers. This helps to protect sensitive data and ensure the availability of critical information systems.

Using a risk assessment, localities must identify the potential adverse impacts on operations, assets, and individuals if Election Records and Sensitive Systems are compromised through a loss of confidentiality, integrity, or availability.

SCOPE

GR 3 applies to Sensitive Systems.

MATURITY MATRIX

GR 3 – Risk Assessment	Baseline	Preferred	Platinum
1. Security Inventory	1.1	All	All
2. Vulnerability Scanning	2.1	All	All
3. Risk Assessment	3.1	3.1-3.2	All

1 Asset Inventory

- 1.1 The GR has an accurate and annually reviewed inventory of information systems and assets used for elections purposes as outlined in TECH 12 – Configuration Management controls 1.1 and 1.2.
- 1.2 The GR and locality IT support have met to identify the Sensitive Systems most critical to elections operations and the systems storing sensitive data. The results of these ongoing discussions are documented in a System Security Plan.



2 Vulnerability Scanning

- 2.1 Locality uses a security scanner at least monthly to find vulnerabilities in critical systems, such as workstations, portable devices, file servers, application servers, and network equipment. Identified vulnerabilities are fixed according to the timeline in the locality's remediation schedule.

3 Risk Assessment

- 3.1 A risk assessment has been conducted within the last two years for Sensitive System classified to identify threats and vulnerabilities to confidentiality, integrity and availability and the environment in which it operates. This includes risks posed to operations, assets, or individuals from individuals accessing locality's systems.
- 3.2 The risk assessment considers risks posed to operations, assets, or individuals from external service providers operating systems on behalf of the locality.
- 3.3 Maintain a risk register that outlines each risk finding and provides a risk treatment plan for critical or high-risk assessment findings.
- 3.4 The GR or local Electoral Board is notified annually of critical and high risks to Sensitive Systems identified by the risk assessment.



GR 4 – LOCALITY ELECTION SECURITY STANDARDS ANNUAL AUDIT

BACKGROUND

The Code of Virginia § 24.2-410.2 requires local EBs to report annually on its plans and procedures to comply with security standards, LESS, established by the SBE. Each locality is required to comply with all standards identified as Baseline and submit a Remediation Plan to ELECT by April 1 for each Baseline standard not met.

Localities must perform a penetration test or scan based on the risk level of their systems.

SCOPE

GR 4 applies to Sensitive Systems.

MATURITY MATRIX

GR 4 – LESS Security Audit	Baseline	Preferred	Platinum
1. Annual Assessment and Penetration Test	All	All	All
2. Remediation Plan	All	All	All

1 Annual Assessment and Penetration Testing

- 1.1 Each locality must review LESS compliance annually. The assessment will review the locality's overall organizational and information technology compliance to the LESS standards and include a Remediation Plan for Baseline standards not met. Assessments are submitted to ELECT as required by March 1. If your locality completed and submitted the LESS Report, you comply with this control.
- 1.2 Localities with internet-facing applications should perform penetration tests on the applications at least once every two years.
- 1.3 The GR or local EB are notified when a penetration test on Sensitive Systems has been conducted.

2 Remediation Plan

- 2.1 Your locality has developed a remediation plan to address baseline controls not met. A new Remediation Plan is created annually. Plans not closed out from the previous year are included in the new Remediation Plan. Plans document the following:
 - 2.1.1 The control out of compliance
 - 2.1.2 The plan to get to compliance
 - 2.1.3 Estimated date to get to compliance
 - 2.1.4 Person responsible for the plan
 - 2.1.5 Progress
 - 2.1.6 Progress Date
 - 2.1.7 Status of the plan (Open/Closed)



2.2 Your locality's remediation plan is regularly updated with a progress report regarding completion efforts. Updates should include information on the age of open items.



GR 5 – PRIVACY AND DATA PROTECTION

BACKGROUND

GR 5 defines personal information, sensitive information, and sensitive system, as well as outlines requirements for the protection of data to ensure its confidentiality, integrity and availability for legal purposes. Localities must develop and implement training to ensure staff understand their responsibilities for protecting personally identifiable and other sensitive information. Localities must design and implement controls over the collection, sharing, storing, transmitting, use, and disposal of sensitive and personally identifiable information.

SCOPE

GR 5 applies to all Election Records and Election Staff.

MATURITY MATRIX

GR 5 – Privacy and Data Protection	Baseline	Preferred	Platinum
1. Personal and Sensitive Information	All	All	All
2. Data Release and Transport	All	All	All
3. Destruction	All	All	All

1 Personal and Sensitive Information

- 1.1 The GR conducts training for Election Staff to identify and protect Sensitive Information.
- 1.2 Election Staff in the roles Locality Admin, VVRS PII, or Records Manager are trained to use a redaction tool.
- 1.3 Election Staff in the roles Locality Admin, VVRS PII, or Records Manager are trained to use an email encryption tool.

2 Release and Transport

- 2.1 Prior to the locality releasing records and information, the GR or Records Manager confirms that records do not contain Personal or Sensitive Information.

3 Destruction

- 3.1 The GR complies with the Library of Virginia Retention Schedule GS-01 for the proper destruction and documentation of destruction of Election Records.



GR 6 – PHYSICAL SECURITY: PERSONNEL, ACCESS, AND ENVIRONMENT

BACKGROUND

GR 6 works to ensure that users comply with the minimum-security prerequisites applicable to their function and are informed of their responsibility to protect locality information; that physical access controls adequately protect equipment and information; and that environmental factors such as emergencies are considered, and controls implemented. Localities must determine and implement proper physical security controls which may include professional security guards, keys, locks, cameras, combinations, and card readers. Localities must also ensure that appropriate background screening is performed on staff and contractors before access is granted to systems and data. Third-Party risk should be managed using non-disclosure, service level, and other agreements.

SCOPE

GR 6 applies to Users with access to Sensitive Systems. GR 6 also applies to all locality, vendor, or third-party organizations.

PHYSICAL SECURITY: PERSONNEL

MATURITY MATRIX

GR 6 – (Personnel)	Baseline	Preferred	Platinum
1 Personnel Screening	1.1-1.3	All	All
2 Personnel Termination and Transfer	All	All	All
3 Personnel, Vendor, and Third-Party Access Agreements	3.1	3.1-3.2	All

1 Personnel Screening

- 1.1 The GR ensures officers of election are registered voters by confirming their status in the VVRS as required by § 24.2-115.
- 1.2 The GR conducts a background check on full-time employees prior to the employee starting work.
- 1.3 The locality conducts background checks on all (full, part-time, and seasonal) staff members involved in the election process.
- 1.4 Individuals granted access credentials to the VVRS undergo a specific, documented screening process if their duties or tasks involve access to sensitive information and assets. Until the required controls are completed, individuals cannot be appointed to a position or have access to sensitive information and assets.

2 Personnel Termination and Transfer

- 2.1 The GR or the Secretary of the locality EB must notify ELECT (during working hours) of the termination or resignation of any user with a VERIS account. Notifications are made via email to electit@elections.virginia.gov. The notification must occur within 4 hours of the user's resignation if voluntary, and within 1 hour if the termination is involuntary.
- 2.2 The locality's or GR's office has a documented off-boarding and transfer process which includes the requirements to terminate/revoke any authenticators/credentials associated with the individual or role and retrieve the appropriate assets.



3 Personnel, Vendor, and Third-Party Access Agreements

- 3.1 Document (and include in Inventory discussed in Risk Assessment 1.1 and Access Control 1.6) any third- party access to locality information and information systems and ensure each has signed appropriate confidentiality agreements.
- 3.2 Develop and document access agreements including Non-Disclosure Agreements (NDAs) for sensitive systems.
- 3.3 Responsible locality entity ensures the appropriate access agreement(s) has (have) been signed and are retained in a secure location, in accordance with locality record retention policies. The base agreements are reviewed annually and changed if needed, and include the below (not an inclusive list):
 - 3.3.1 Contractors shall fully cooperate with Commonwealth incident response resources and all required law enforcement personnel for assistance in the handling and reporting of security incidents.
 - 3.3.2 Contractors shall comply with the privacy and security requirements mandated by federal, state, and local laws and regulations.
 - 3.3.3 Contractors shall not use any software, hardware, or services prohibited pursuant to § 2.2-5514 of the Code of Virginia.
 - 3.3.4 Contractors shall only store and process ELECT data within the continental United States.
- 3.4 As part of contracts or service level agreements (SLAs), require third-party entities to perform the appropriate background checks of personnel, and to notify the localities when the entity's personnel are transferred or terminated.
- 3.5 Does the locality store election data in a third-party application hosted in the cloud, such as G Suite, Airtable, or Monday.com?



PHYSICAL SECURITY: ENVIRONMENTAL PROTECTION

MATURITY MATRIX

GR 6 – (Physical & Environmental Protection)	Baseline	Preferred	Platinum
4. Emergency Power	4.1	All	All
5. Location of Information System Components	All	All	All

4 Emergency Power

- 4.1 Short-term uninterruptible power supply (UPS) or a generator is installed to facilitate an orderly shutdown of elections desktops or servers in the event of a primary power source loss.
- 4.2 Any UPS supporting infrastructure is tested quarterly and generators are tested annually to ensure the devices are working properly. The results of these tests are documented. The following information is documented:
 - 4.2.1 Date of test
 - 4.2.2 Name of Person performing the test
 - 4.2.3 Name of Device tested
 - 4.2.4 Results of the test

5 Location of Information System Components

- 5.1 Elections equipment and documents are stored in a secure environment.



PHYSICAL SECURITY: ACCESS

MATURITY MATRIX

GR 6 – (Physical Access)	Baseline	Preferred	Platinum
6. Restricted Access Area	All	All	All
7. Monitor Physical Access	7.1	All	All
8. Access Records for Secure Areas	All	All	All
9. Visitor Access	9.1	All	All

6 Restricted Access Area

- 6.1 Access to Sensitive Systems is restricted to authorized personnel through keys, combination locks, badges, or smart cards.
- 6.2 Access list to physical spaces is reviewed quarterly to ensure that individuals still require access. Physical access devices are collected from those that no longer need access.
- 6.3 Keys, badges, smart cards, equipment, and documents are collected and deactivated within 24 hours of last active day of work. Combinations are changed within 24 hours of last active day of work in a voluntary termination or transfer. Keys, badges, smart cards, equipment, and documents are collected and deactivated immediately for involuntary terminations. Combinations are changed immediately for involuntary terminations.
- 6.4 Physical access devices are secured in a lock box or cabinet. Combinations are stored securely, such as a software key vault.

7 Monitor Physical Access

- 7.1 Except for election-day chain of custody provisions, access to physical spaces where systems that support elections and/or ballots are stored are monitored with cameras, card readers, or security alarm systems as outlined in the Voting System Security Plan.
- 7.2 Access logs are reviewed monthly for anomalies.
- 7.3 Violations are handled through the incident response process as discovered.

8 Access List for Physical Spaces

- 8.1 The record of individuals granted access to elections equipment or documents is maintained and updated quarterly. The document captures the following:
 - 8.1.1 The individual provided physical access
 - 8.1.2 Approval of access
 - 8.1.3 Date access was provided
 - 8.1.4 What physical access the individual has. (Rooms/Cabinets/Physical Documents)
 - 8.1.5 Physical access devices (Keys, badges, smart cards) provided to the individual
 - 8.1.6 Date access was revoked



9 Visitor Access

- 9.1 Visitors such as guests or maintenance personnel that do not have access must register their visit with the locality before being given access. Documentation must capture the following:
 - 9.1.1 Visitor name and business they represent
 - 9.1.2 Purpose of visit
 - 9.1.3 Date/time of arrival
 - 9.1.4 Date/time of departure
 - 9.1.5 Temporary badge id if applicable
- 9.2 All visitors must be escorted by a locality representative at all times.



ORG 7 – ORGANIZATIONAL POLICIES AND PROCEDURES

BACKGROUND

ORG 7 assists locality leadership and management, as well as technology or security personnel to prioritize, and fund a locality Information Security Program that will support compliance with the LESS. The locality must document and implement policies and procedures for the effective implementation of the LESS controls, including but not limited to acceptable use policy, business continuity plan, etc. Localities must also document a System Security Plan that describes how security requirements for election systems and data are met.

SCOPE

Requirements for policies, plans and procedures apply to all localities and Sensitive Systems. Software includes, but is not limited to operating systems, database software, applications, firmware, encryption software, security software, network/General Support System (GSS) support applications, and any other software resident on (or necessary to a component to access) the sensitive elections related system(s). *This standard also applies to all network- based and locally based authentication and stand-alone systems utilized to gain access to Sensitive Systems.*

ORG 7 – Organizational Policies and Procedures	Baseline	Preferred	Platinum
1. Organizational Security Planning	1.1, 1.2, 1.5	1.1-1.3, 1.5, 1.7	All
2. System Security Planning	2.1	All	All
3. Acceptable Use and Policies	All	All	All

1 Organizational Security Planning

- 1.1 Locality leadership (city/county administrator or technology leadership) has provided the GR a Business Impact Assessment (BIA) within the last year, that specifically addresses the locality's elections-specific mission and goals and:
 - 1.1.1 Lists all core functions, in order of priority with relation to organizational mission and goals.
 - 1.1.2 Outlines impact of the loss or degradation of the functions with respect to the mission goals.
- 1.2 Within the last year, your locality has created and/or updated an elections-specific Contingency Plan (CP) that, among other goals, does the following:
 - 1.2.1 Identify essential missions and business functions and associated contingency requirements.
 - 1.2.2 Identify critical system assets supporting essential missions and business functions.
 - 1.2.3 Provide recovery objectives, restoration priorities, and metrics.
 - 1.2.4 Address contingency roles, responsibilities, assigned individuals with contact information.
 - 1.2.5 Address maintaining essential missions and business functions despite a system disruption, compromise, or failure.
 - 1.2.6 Address eventual, full system restoration without deterioration of the security and privacy controls originally planned and implemented.
 - 1.2.7 Be reviewed and agreed to by the locality, GR, and EB.
- 1.3 The Contingency Plan lists the people, tools, technologies, processes, and support functions that must be in place to resume normal or possibly degraded functionality when one or more threats materialize to place the mission of the organization in jeopardy. Some examples of threats include, but are not limited to:
 - 1.3.1 Damaging weather (wind/flood, etc.).



- 1.3.2 Civil Unrest.
- 1.3.3 Cyber Attack.
- 1.3.4 Loss of Power or Internet Service.
- 1.3.5 Insider Threat.
- 1.4 The locality's Security Program includes the existence of a Systems Security Plan, BIA, and Contingency Planning Policy – all of which have been reviewed within the last year, provided to the locality, GR, and EB, and comply with the standards outlined in 1.1-1.3 to cover the scope of Sensitive Systems.
- 1.5 Your locality Contingency governance (whether your locality has some or all of the Contingency Plan, Contingency Planning Policy, Contingency Procedure) addresses purpose, scope, roles, responsibilities, management commitment, coordination among organizational entities, and compliance and facilitates the implementation of the contingency planning policy and the associated contingency planning controls, to include:
 - 1.5.1 Coordination of contingency planning with the appropriate organizational elements – leadership, technology, personnel, fiscal, maintenance.
 - 1.5.2 Alignment with contingency plans of external service providers to ensure that contingency requirements can be satisfied.
 - 1.5.3 Identifying alternative processing and storage sites that are separated from the primary site(s) to reduce susceptibility to the same threats.
- 1.6 Training is consistent with assigned roles and responsibilities in the contingency plan and any related policies, procedures, or plans.
- 1.7 Training incorporates simulated events into contingency training to facilitate effective response by personnel in crises.
- 1.8 Testing the contingency plan using varying methods but at least once in the last calendar year that:
 - 1.8.1 Tests the alternate processing site and alternate telecommunications services to familiarize personnel with the facility, resources, and to allow the evaluation of capabilities of alternative site/telecommunications services to support contingency operations.
 - 1.8.2 Test includes full recovery and constitution of the system to a known state.

2 System Security Planning (SSP)

- 2.1 The locality has developed a security plan for sensitive systems. Each system security plan:
 - 2.1.1 Maps the relevant, associated elements of the organization's enterprise architecture.
 - 2.1.2 Explicitly defines the authorization boundary for the system.
 - 2.1.3 Describes the operational context of the information systems in terms of missions and business processes.
 - 2.1.4 Provides the security categorization of the information system and relationships with or connections to other information systems.
 - 2.1.5 Provides an overview of the security requirements for the system and identifies any relevant overlays, if applicable.
 - 2.1.6 Describes the security controls in place or planned for meeting those requirements, including a rationale for the tailoring decisions.
- 2.2 Within the last year, the locality's security plan has been updated to address changes to



the information system, environment of operation or problems identified during security control assessments and distributed to appropriate managers.

3 Acceptable Use Policy

- 3.1 Your locality Acceptable Use policy has been distributed to all elections employees and reviewed/updated in the last calendar year, and clearly:
 - 3.1.1 Prohibits the use of elections assets for personal gain, to promote hatred or discriminatory tendencies, to misrepresent or make fraudulent statements, or for pornography.
 - 3.1.2 Prohibits unauthorized remote connections, installation of software or any unauthorized modifications to Information System assets or hardware components; intrusive network monitoring; bypassing security mechanisms; using assets to elevate user privilege beyond what is approved and needed for business requirements.
 - 3.1.3 Notifies users that their activities may be monitored, inspected, and collected without user permission; prohibits the sharing of sensitive information with non-authorized individuals, on social media, or in printed materials; requires users to use encryption or another secured means to share sensitive information with authorized users; outlines responsibility to secure and dispose of sensitive material falls on individuals to whom access, or materials are given.
- 3.2 If remote work is permitted, Remote Access policy has been reviewed and updated, as well as distributed to all elections employees, in the last calendar year.



TECH 8 – PASSWORD MANAGEMENT

BACKGROUND

TECH 8 outlines technical controls necessary to mitigate the risk of unauthorized access. Password management controls help protect systems and data from unauthorized access. By implementing and enforcing effective password management controls, localities can reduce the risk of password-related cyberattacks, such as brute-force, phishing, and credential stuffing attacks. Password management controls comprise technical and administrative controls. Technical controls refer to technologies such as password managers that help users create and manage strong passwords. Administrative controls include policies and procedures that govern password usage, including change requirements and sharing prohibitions. Localities should leverage multifactor authentication (MFA) to add an extra layer of security to login processes.

SCOPE

TECH 8 applies to Sensitive Systems. TECH 8 also applies to all network-based and locally based authentication and stand-alone systems utilized to gain access to Sensitive Systems.

MATURITY MATRIX

TECH 8 – Password Management	Baseline	Preferred	Platinum
1. Password Complexity	1.1-1.3	1.1-1.3	All
2. Password Management	2.1-2.7	2.1-2.7	All

1 Password Complexity

- 1.1 All system passwords to access Sensitive Systems are at least 14 characters in length.
- 1.2 Passwords must contain three of the following: upper case character, lower case character, number, and special character.
- 1.3 Passwords cannot contain whole or partial usernames, user ids, or repeating strings (e.g. 12341234).
- 1.4 Passwords are compared against a common password list before being accepted to prevent easily guessable passwords.

2 Password Management

- 2.1 Passwords are encrypted at AES 256 or higher when transmitted or stored.
- 2.2 Passwords are not shared.
- 2.3 Passwords are not displayed on screen on entry, are obscured while being entered, and cannot be unmasked.
- 2.4 Users authenticate with current password before changing to a new one. The previous 3 passwords may not be reused when resetting passwords.
- 2.5 Access to the password storage location is highly restricted.
- 2.6 All systems require passwords to be changed every 90 days.
- 2.7 All elections staff have a password manager approved and installed by authorized technology personnel.
- 2.8 Feedback for invalid credentials is vague and does not provide clues to why an authentication failed. If a user tries to log in unsuccessfully, they only receive a "Login Unsuccessful" message. Additionally, password composition is never displayed to an unauthorized user.



TECH 9 – SYSTEM AND COMMUNICATION PROTECTION

BACKGROUND

TECH 9 outlines controls implementing boundary protection devices to monitor activity, traffic, and potential attacks; ensure appropriate encryption for data in transit and at rest; and outline requirements for wireless devices. Boundary protection controls must be designed to protect the internal networks and systems at localities from unauthorized access and attacks. These controls should be implemented at the perimeter of the locality's network, where it connects to the internet or other external networks. Boundary protection controls may include firewalls, intrusion detection system and prevention systems (IDS/IPS), and web-filtering solutions. Boundary protection controls work by filtering and blocking traffic between the internal and external networks based on predefined rules and policies. These rules and policies may be based on source and destination IP addresses, ports, protocols, etc. To enhance the effectiveness of boundary protection controls, localities should ensure these controls are implemented in a layered manner, with a combination of different types of controls. Localities must ensure that data at rest is encrypted, and all data in-transit is wrapped in secure protocols.

SCOPE

TECH 9 applies to Sensitive Systems.

MATURITY MATRIX

TECH 9 – System and Communication Protection	Baseline	Preferred	Platinum
1. Boundary Protection	1.1- 1.3	All	All
2. Use of Cryptography	2.1-2.2	All	All
3. Wireless Devices	3.1-3.2	3.1-3.3	All

1 Boundary Protection

- 1.1 Boundary protection devices such as firewalls, gateways, routers, and proxies are used to manage connections to external systems and incoming requests. Localities must also have an architectural diagram of how these tools are implemented locally.
- 1.2 Unused network and physical device ports are disabled to prevent unauthorized access.
- 1.3 Subnetworks are implemented for publicly accessible system components to separate them from internal organizational networks.
- 1.4 Monitoring tools are put in place to monitor potential Distributed Denial-of-Service (DDoS) attacks. These tools are also capable of mitigating DDoS attacks.
- 1.5 Port protection capabilities are incorporated into the network and servers to protect against attacks such as ethernet switching table overflow attacks, DHCP server attacks, ARP spoofing attacks, DHCP starvation attacks and prevent the connection of unauthorized equipment to network/servers.

2 Cryptography

- 2.1 All Sensitive Information must be encrypted while in transit.
- 2.2 All Sensitive Information must be encrypted while at rest.
- 2.3 Digital signatures must be part of the encryption process.



3 Wireless Network

- 3.1 Wireless access points are password protected in compliance with Tech 8 Password Management.
- 3.2 Encryption compliant with Federal Information Processing Standards (FIPS), such as FIPS 140-3, is enabled on wireless networks.
- 3.3 Wireless networks are not publicly viewable (the SSID of a locality wireless network should be hidden).
- 3.4 Logging is enabled on wireless networks and logging information is generated per Tech 14 System Audit Logs.



TECH 10 – SYSTEM AND INFORMATION INTEGRITY

BACKGROUND

TECH 10 addresses required malicious code protections, security alerts, advisories and directives, information system monitoring, backups, and recovery. System and information integrity safeguards are designed to protect the integrity of election systems and data. These safeguards help ensure that election systems are operating as intended and that the related election data is accurate and reliable. System and information integrity controls can be broadly classified into these four categories:

- Malicious code protection – controls designed to prevent, detect, and remove malicious code from information systems. These controls include antivirus software, intrusion detection and prevention systems (IDS/IPS), and application whitelisting.
- Security alerts and advisories – provide localities with information on security vulnerabilities and potential threats to Sensitive Systems and data. Information or insights from these alerts/advisories can be leveraged to prioritize system remediation efforts and mitigate the risk of security breaches.
- Information system monitoring – involves collecting and analyzing data about the performance, capacity, and security of information systems. This data can help localities to identify and respond to security incidents in a timely manner.
- Backup and recovery – ensure that data can be restored in the event of a data loss or corruption. Backup and recovery controls include regular backups, offsite data storage, and data recovery procedures.

Localities should layer these controls to mitigate the risk of security breaches even if one layer is compromised.

SCOPE

TECH 10 applies to Sensitive Systems.

MATURITY MATRIX

TECH 10 – System and Information Integrity	Baseline	Preferred	Platinum
1. Malicious Code Protection	All	All	All
2. Security Alerts, Advisories, and Directives	All	All	All
3. Information System Monitoring	3.1	3.1	All
4. Backup and Recovery	All	All	All

1 Malicious Code Protection

- 1.1 Any devices (PCs and Servers) that connect to ELECT's systems must have an active anti-malware/anti-virus/malicious code scanning tool enabled at all times. All patches/updates must occur on a monthly basis at minimum or sooner as needed to address specific vulnerabilities.

2 Security Alerts, Advisories and Directives

- 2.1 The GR, locality IT representatives, or both, are members of the Center for Internet Security (CIS) Elections Infrastructure Information Sharing & Analysis Center (EI-ISAC) and/or Multi-State ISAC (MS-ISAC).



- 2.2 Locality has implemented a process to automatically review security alerts, advisories, and directives and take appropriate action, including sharing the information with relevant stakeholders or implementing required security updates.

3 Information System Monitoring

- 3.1 Any devices that connect to ELECT's systems must be continuously monitored for the following:
- 3.1.1 Login Failures
 - 3.1.2 Access exceptions
 - 3.1.3 System exceptions
 - 3.1.4 Operating System and Application patching
- 3.2 Any devices that connect to ELECT's systems must continuously log the following:
- 3.2.1 Login Failures
 - 3.2.2 Access exceptions
 - 3.2.3 System exceptions
 - 3.2.4 Operating System and Application patching

4 Backup and Recovery

- 4.1 Provide the capability to restore system components within the Continuity of Operations Plan (COOP), from configuration-controlled and integrity-protected information.
- 4.2 Depending on criticality, perform monthly, quarterly, and annual backups of system data and system images. The locality regularly updates documentation identifying the level of criticality and frequency required.
- 4.3 Backup copies of critical systems are stored in a separate facility or in a fire-rated container that is not co-located with the operational system.
- 4.4 Test data backups quarterly to ensure data recovery, integrity, and usability.
- 4.5 Test system recovery annually to verify the integrity and usability of system backups.



TECH 11 – ACCESS CONTROL

BACKGROUND

TECH 11 outlines requirements to prevent unauthorized user access by verifying and validating users are permitted to access the systems and data. Some of the requirements in this section include:

- Separation of duties – to ensure no single individual can perform all the tasks related to a process or transaction.
- Unsuccessful login attempts – to mitigate brute-force attacks or unauthorized access, monitor the number of unsuccessful logins attempts to information systems, and lock the system when the defined threshold is met.
- System use notification – to help deter users from malicious behavior by displaying messages that may include system security policy and consequences of unauthorized behavior or access.
- Least privilege – to ensure users are only granted privileges required to perform their assigned duties.
- Multifactor authentication – require users to use more than factor for authentication before access is granted. This adds an additional layer of protection from unauthorized access.

While not a specific requirement in this section, where feasible, localities should consider implementing identity and access management (IAM) systems that facilitate the management of user identities and access privileges. Localities should also consider the use of directories such as Microsoft's Active Directory in the management of access in their environments.

SCOPE

TECH 11 applies to all Sensitive Systems. This standard applies to all network-based and locally based authentication and stand-alone systems utilized to gain access to Sensitive Systems.

MATURITY MATRIX

TECH 11 – Access Control	Baseline	Preferred	Platinum
1. Actively Manage Access	1.1-1.8	1.1-1.11	All
2. Separation of Duties and Account Creation	2.1-2.2	2.1-2.2	All
3. Access	All	All	All
4. Mobile Devices	All	All	All
5. Unsuccessful Logon Attempts	All	All	All
6. System Use Notification	All	All	All

1 Actively Manage Access

- 1.1 Access to systems is limited only to authorized personnel who need access to the system to perform specific assignments.
- 1.2 Users given access to systems are given the minimum level of access required within the system to perform their jobs, adhering to the principle of “least privilege”.
- 1.3 Separate accounts are created and maintained for elevated/privileged accounts. These accounts must adhere to 1.1 and 1.2 and may not be used for daily business work.



- 1.4 Users who change roles or positions must have their access reviewed to ensure access still complies with 1.1-1.3. Access within a system or to a system that is no longer needed is removed.
- 1.5 Requests for new accounts or access must capture the following:
 - 1.5.1 Requestor's name, date, and role,
 - 1.5.2 Supervisor name
 - 1.5.3 Approver of the request
 - 1.5.4 When the request was approved
 - 1.5.5 Systems and level of access granted
- 1.6 Privileged accounts are automatically logged out after five minutes of inactivity.
- 1.7 No temporary, test, or default accounts are permitted. If the account is necessary, it is set up as a permanent account with a unique id.
- 1.8 Disable service and network sign-on accounts from concurrent use.
- 1.9 Disable user accounts within 24 hours of the last active day of work. Disable user accounts immediately for involuntary termination.
- 1.10 Automate quarterly account reviews to ensure accounts for terminated personnel or accounts that have not been active in the last 90 days are disabled.
- 1.11 List the role(s) a user will need to perform business functions on the application for a new user account. Applicants or assigned supervisors must list the systems and groups the user needs, prior to account approval and creation.
- 1.12 Log and track privileged accounts usage separately from the use of general user accounts. Review the privileged users' activities on the system(s) for which they are accountable, at least quarterly.

2 Separation of Duties and Account Creation

- 2.1 Shared accounts and passwords are prohibited.
- 2.2 Every user granted an account to an information system is assigned a unique ID for account access traceability.
- 2.3 Ensure security personnel who administer access control functions do not administer audit functions. For sensitive processes, assign different tasks of a process to more than one individual so that no one person can solely initiate, record, authorize, and reconcile a transaction without the intervention of another person.

3 Access

- 3.1 Employ two-factor authentication as part of the identification and authentication process for remote access or to use admin accounts.
- 3.2 Accounts are locked after 15 minutes of inactivity. Users must re-authenticate to regain access.
- 3.3 Users are identified and authenticated (including a confirmation that required training has been completed) before receiving credentials.
- 3.4 Every system records when users access a system. At a minimum it captures the user id, the action, and the date and time.

4 Mobile Devices

- 4.1 All mobile devices used to conduct elections business must be password protected.
- 4.2 All mobile devices used to conduct elections business must be configured to permit the locality to



remote wipe the device.



- 4.3 Encrypt mobile devices that contain elections specific data to protect the confidentiality and integrity of that information. Encryption must be AES 256 compliant and applies to data storage and transmission (where applicable).

5 Unsuccessful Logon Attempts

- 5.1 Invalid logon attempts are limited to three attempts within a 15-minute period. If three invalid attempts are detected within 15 minutes, then the account is time-locked for 15 minutes.
- 5.2 Do not provide users any indication of what the password lacked during any unsuccessful login attempt(s). For example, if a user tries to log in unsuccessfully, they only receive a "Login Unsuccessful" message. Unsuccessful login details are not provided to the user.

6 System Use Notification

- 6.1 Display to users a notification message or banner before granting access to a local system. This message is displayed until users acknowledge the usage conditions and take explicit actions to log on. The message provides privacy and security notices consistent with applicable federal laws, executive orders, directives, policies, regulations, standards and guide and states at a minimum the following:
 - 6.1.1 Users are accessing a government or private information system.
 - 6.1.2 The information system usage may be monitored, recorded, and subject to audit.
 - 6.1.3 Unauthorized use of the information system is prohibited and subject to criminal and civil penalties.
 - 6.1.4 Use of the information system indicates consent to monitoring and recording.



TECH 12 – CONFIGURATION MANAGEMENT

BACKGROUND

TECH 12 outlines configuration management requirements designed to help mitigate the risk of unauthorized changes being introduced into information systems without proper approval. These controls are also essential in detecting configuration changes that have occurred and restoring systems to a known good state in the event of a security incident or system failure. Configuration management controls are particularly important for sensitive systems, as these systems must be highly reliable and secure to ensure the integrity of the electoral process.

Localities must ensure that a baseline configuration, referred to as a known good state of a system that includes all installed software, security software, and configuration settings, is maintained for each system component. Once a baseline configuration has been established, localities must implement change control practices to ensure that all changes to systems are authorized, documented, and tested. Change control procedures must include a process to review and approve proposed changes and test such changes before they are implemented in the production environment.

Specific examples of configuration management controls that localities can implement include:

- Establish a baseline configuration for each election-related system component – the baseline should include all installed software, security patches and configuration settings.
- Implement change control procedures – ensure all changes are documented, reviewed, approved, and tested.
- Use configuration management tools – to ensure all changes are properly documented and authorized.
- Perform regular reviews of system configuration – to detect unauthorized changes and ensure all system components are in a good known state.

SCOPE

TECH 12 applies to all infrastructure owned or managed by localities (or designated third party) that are used to provide IT services in support of Sensitive Systems, their individual components, and any software or applications resident on those systems – or necessary to access said system(s).

MATURITY MATRIX

TECH 12 – Configuration Management	Baseline	Preferred	Platinum
1. Baseline Configuration for Elections Related Systems	1.1-1.3	1.1-1.4	All
2. Change Control	2.1	2.1	2.1

1 Baseline Configuration for Elections Related Systems

- 1.1 An inventory of hardware assets is maintained. The inventory should capture the following for hardware assets
 - 1.1.1 Type of equipment
 - 1.1.2 Manufacturer
 - 1.1.3 Model
 - 1.1.4 Serial Number
 - 1.1.5 Manufacturing Date
- 1.2 An inventory of software assets is maintained. The inventory should capture the following for software assets
 - 1.2.1 Name of software
 - 1.2.2 Software vendor
 - 1.2.3 License quantity



- 1.2.4 License expiration
- 1.3 The baseline configuration for hardware and software is documented for each item on the inventory listed created in 1.1 and 1.2. This document is updated continually as configurations are changed,
- 1.4 Localities with locally maintained IT services must capture configuration information for hardware and software. Below is a list of configuration settings that are captured. This list is not intended to be exhaustive.
 - 1.4.1 HARDWARE: Open Ports, White/Blacklist of IP Addresses, DNS Settings, Connected Devices, Installed Software, Installed OS, Security Policies, Processors, Memory, Diskspace
 - 1.4.2 SOFTWARE: Home/Install Directory, Environment Variables/Paths, Memory Settings, CPU Settings, Plugins, Database Connections
- 1.5 Technical architecture diagrams are created, maintained, and kept secure for sensitive systems. These diagrams should capture information about the following:
 - 1.5.1 Topology that captures components and their interconnections
 - 1.5.2 Components, including their IP addresses and model or serial numbers
 - 1.5.3 Configurations, including information on aspects such as the voter registration database
 - 1.5.4 Information security mechanisms in place, including encryption and access control
 - 1.5.5 Maintenance practices/procedures
 - 1.5.6 Testing and certifications related to the system

2 Change Control

- 2.1 A documented change control process must be in place to manage changes to hardware or software systems. The process must include a step to update relevant inventories or diagrams that may be impacted by changes. This process must capture the following information for each change:
 - 2.1.1 Description of the change that includes information about the hardware or software being changed.
 - 2.1.2 Who requested the change
 - 2.1.3 Who is responsible for implementing the change
 - 2.1.4 The date/time the change will be implemented
 - 2.1.5 Who approved the change
 - 2.1.6 Information Security Officer (ISO) or person representing the ISO role approval



TECH 13 – MAINTENANCE

BACKGROUND

TECH 13 addresses maintenance of physical assets and locations, as well as software, providing documentation requirements to ensure external parties also comply. These controls are designed to ensure that Sensitive Systems and components are properly maintained and updated to keep them secure and operating as intended. The maintenance controls help prevent system failures, mitigate security vulnerabilities, and ensure the availability of sensitive systems and data.

Maintenance controls can be classified as follows:

- Physical maintenance – involve the care and upkeep of the physical component of information systems, such as servers, workstations, network equipment, etc. Physical maintenance may include cleaning and inspecting equipment, replacing defective components, etc.
- Software maintenance – involve the updating and patching of software applications to keep them secure. Some of the related tasks include installing security patches, updating new versions of software, and fixing bugs.
- Maintenance documentation – involve keeping a record of all maintenance activities that have been performed on information systems. Such documentation should include the date and time of maintenance activity, name of person who performed the maintenance, a description of the work that was performed, and any other information.

SCOPE

The Maintenance standard addresses information security aspects of the maintenance program for Sensitive Systems. System maintenance includes those components not directly associated with information processing and/or data information retention such as scanners, copiers, and printers.

MATURITY MATRIX

TECH 13 – Maintenance	Baseline	Preferred	Platinum
1. Physical Maintenance	All	All	All
2. Software Maintenance	All	All	All
3. Maintenance Documentation	All	All	All

1 Physical Maintenance

- 1.1 Physical equipment used to support election processes (election equipment) is serviced in accordance with manufacturer or vendor specifications and/or organizational requirements. If voting equipment is involved, maintenance must be performed as outlined in the Voting System Security Plan.
- 1.2 Maintenance and service performed on elections equipment is documented. The following information is captured for each device serviced:
 - 1.2.1 Equipment Serviced
 - 1.2.2 Equipment Identification Number
 - 1.2.3 Date/time of service
 - 1.2.4 Name of person that performed service
 - 1.2.5 Description of service performed
 - 1.2.6 If the equipment was serviced offsite
 - 1.2.7 Person that authorized offsite service
 - 1.2.8 Date/Time equipment was removed
 - 1.2.9 Date/Time equipment was returned



- 1.2.10 Date/Time equipment was tested
- 1.2.11 Person(s) that performed the test
- 1.3 Elections equipment that needs to be serviced offsite must be approved before being removed. This information is documented as outlined in 1.2.
- 1.4 Localities test equipment and software after maintenance to verify security controls and functionality. Testing of equipment is documented on the service records in 1.2.
- 1.5 Equipment that is decommissioned must document the following:
 - 1.5.1 Equipment decommissioned
 - 1.5.2 Equipment Identification Number
 - 1.5.3 Date/Time equipment decommissioned
 - 1.5.4 Person(s) that decommissioned the equipment
 - 1.5.5 Date/Time equipment was removed
- 1.6 Equipment that is decommissioned must have the following performed before being removed:
 - 1.6.1 Any equipment media is sanitized as per NIST or COV guidelines
 - 1.6.2 Equipment default settings are restored

2 Software Maintenance

- 2.1 Equipment running operating systems and/or software for elections must be updated regularly. Operating system and software should still be receiving security updates from the vendor.
- 2.2 Software/OS updates and diagnostic activities are approved and scheduled in accordance with Configuration Management policies.

3 Maintenance Documentation

- 3.1 Localities must ensure that contractors and vendors are taking appropriate measures to prevent the introduction of security vulnerabilities into their equipment. In addition to items addressed in GR 6 (Physical Security), localities must request and receive the following from vendors providing software and hardware for elections-systems:
 - 3.1.1 Contractor's and vendors' security policies regarding their equipment and tools used to maintain the equipment.
 - 3.1.2 Contracts that address data handling, reporting responsibilities in the event of a breach, termination conditions, necessary background checks, and remediation.



TECH 14 – SYSTEM AUDIT LOGS

BACKGROUND

TECH 14 works to ensure essential system activity records are captured, reviewed, and preserved. Localities must maintain system audit logs to help with the detection and investigation of security incidents, troubleshooting of system problems, and compliance with LESS requirements. Logs such as application logs, user logs, database log, network logs and system logs, can be leveraged to identify suspicious or potentially malicious activity.

System log controls must be implemented in a manner that ensures security logs are generated, collected, stored, and analyzed in a secure manner. These controls should cover the lifecycle of audit logs including:

- Generation – ensure audit logs are configured and generated for all identified/defined system activities.
- Collection – logs are collected and stored in a secure/tamper-proof location.
- Storage – logs are stored for a sufficient period to support investigations of incidents.
- Analysis – logs are analyzed for suspicious activity and indicators of compromise (IOCs).

SCOPE

TECH 14 applies to all Sensitive Systems.

MATURITY MATRIX

TECH 14 – System Audit Logs	Baseline	Preferred	Platinum
1. Auditable Events and Automated Alerts	1.1-1.2	All	All
2. Review, Analysis and Retention	2.1-2.2	All	All

1 Auditable Events and Automated Alerts

- 1.1 Event logging is enabled on all information systems and operating systems.
- 1.2 At minimum, the logs will include:
 - 1.2.1 The event
 - 1.2.2 The user ID associated with the event; and
 - 1.2.3 The time the event occurred
- 1.3 Whenever possible, all systems utilize Network Time Protocol (NTP) time synchronization.
- 1.4 Log storage capacity is monitored. For example, automated alerts are provided when log storage capacity reaches pre-defined levels (e.g., 50%, 80%, and 95%).

2 Review, Analysis and Retention

- 2.1 Audit records are backed up to a machine different than the originating system on a quarterly basis.
- 2.2 Audit records are reviewed and analyzed every 30 days for inappropriate or unusual activity. Findings are reported using the Incident Response process.
- 2.3 Audit records, audit settings, and audit reports are protected from unauthorized access, modification, and deletion by setting appropriate access controls.
- 2.4 Retain audit records consistent with State and Local retention policies, to provide support for



after-the- fact investigations of security incidents.



GLOSSARY

Asset: Any hardware, software, or technological resource that an organization uses to manage or deliver IT services. Hardware can include computers, mobile devices, peripherals, servers, routers, printers, scanners, security cameras. Software includes licenses, operating systems, applications, and programs. Cloud assets include virtual machines, storage resources, networking assets, access management platform, firewalls, and security services. Data assets include contracts, warranties,

Components: Includes but not limited to user productivity systems (laptops/desktops as similarly configured groups), application servers, mobile devices (with similar configurations), network peripherals (printers, scanner, etc.), network infrastructure (routers, switches, firewalls, intrusion detection systems, file servers, databases, system monitoring and security tools, etc.), and cloud assets.

Election Records: Paper and electronic information defined in the Library of Virginia's GS-01 record retention schedule.

Election Staff: The term 'election staff' refers to all personnel employed or appointed with access to voter registration records, electronic or paper, that contains PII including officers of elections, contractors, and their employees.

Incident Response Handling focuses on the actions and efforts required to effectively respond to an incident after it has been confirmed. This includes coordinating among local, state, and federal partners in performing the technical and business recovery steps.

Multifactor Authentication (MFA) requires users to enter two or more factors of authentication, such as a password and a one-time code before accessing systems and data.

Penetration Scan: Automated scan for common vulnerabilities, less comprehensive and expensive than human-led penetration tests

Penetration Test: Test typically performed by humans using a variety of tools and techniques to gain unauthorized access.

Personal Information means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. This includes

(i) identifiers such as internet protocol address, email address, home address, contact information, account name, social security number, driver's license number, passport number, or other similar identifiers; (ii) information contained in voter registration forms, applications for absentee ballots; and (iii) voter registration or participation history. The term does not include information that is lawfully obtained from publicly available information, or from federal, state, or local government records lawfully made available to the general public.

Physical Access Devices include keys, combination locks, badges, or smart cards.

Roles: Locality Admin, VERIS PII, VERIS User, Document Intake, '405' Access, and Locality IT

- **Locality Admin (GR):** Staff in a locality's Office of Voter Registration who can request access to the VRS. These users have full permissions to the VRS including access to PII.



- **VRS PII:** Local user of the VRS with access to PII. These staff have both physical and electronic access to PII. They have unique emails provided by the locality.
- **VRS User:** Local user of the VRS without access to PII. These staff have physical but not electronic access to PII. They have unique emails provided by the locality.
- **Physical Access:** Individuals who have physical access to voter registration records that contain PII. This includes Officers of Election who accept voter registration applications, third-party voter registration drives, etc.
- **'405' Access:** Individuals who have access to data made available through Va Code. 24.2-405. This data includes names, address, year of birth, election districts. This includes Officers of Elections, poll book vendors, third-party mail ballot vendors, etc.
- **Locality IT:** Has access to sensitive systems (defined in GR 5) that store or transmit election data. This includes administrative access to email, shared drives, etc. While they do not have direct access to the VRS, they support systems that access, transmit, or store data from it.
- **Remote User:** As the ability to access county systems remotely.
- **Mobile Device:** Has been assigned a county cell phone or hot spot.
- **Records Manager**
- **Electoral Board Member:** Has access to sensitive election security information.

Sensitive Information means all records, information and data in any format regarding (i) the security of elections offices, polling places, voting and counting equipment, ballots, the Virginia voter registration system and supporting technologies; (ii) sensitive personal information as defined in 1 VAC 20-20-20; (iii) personal information as defined in the Code of Virginia §18.2-186.6 and (iv) information exempt or excluded from the Freedom of Information Act as described in the Code of Virginia 24.2, et seq. and 2.2-3700, et seq.

Sensitive System means supporting technologies used by localities to maintain and record registrant information. These systems contain Sensitive Information, information designated as confidential or restricted by ELECT, or information (or a system) designated as sensitive by the locality or ELECT. This can include applications, servers, computers, and networks that process, store, and access or transmit voter registration records. Components include but are not limited to user productivity systems (laptops/desktops as similarly configured groups), application servers, mobile devices (with similar configurations), network peripherals (printers, scanner, etc.), network infrastructure (routers, switches, firewalls, intrusion detection systems, file servers, databases, system monitoring and security tools, etc.), and cloud assets. Software includes, but is limited to: operating systems, database software, applications (including mobile), firmware, encryption software, security software, network/GSS support applications and any other software resident on (or necessary to a component to access) the sensitive systems.

Users: Locality employees, contractors or third parties with physical or logical access to Election Records.

Virginia Election and Registration Information System (VERIS): the statewide database of registered voters in Virginia maintained by the Virginia Department of Elections.



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STATE BOARD *of* ELECTIONS

Campaign Finance Appeals

- A. Locally Assessed Penalty Appeals
 - B. State Assessed Penalty Appeals
-

BOARD WORKING PAPERS
Emily Mynarski
Campaign Finance Compliance
and Training Specialist



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STATE BOARD *of* ELECTIONS

Memorandum

To: Chairman O'Bannon, Vice Chair Dance, Secretary Alvis-Long, Dr. Christopher Stolle, and Dr. Sally Hudson

From: Emily Mynarski, Campaign Finance Compliance/Training Specialist

Date: September 15, 2026

Re: Campaign Finance Penalties Appeal Hearing

Suggested Motions:

- GRANTING APPEAL: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief...
 - o ...as requested by the petitioner."
 - or-
 - o ...[*state relief to be granted if different than requested*]."
- DISMISSING APPEAL: "Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner's appeal of the assessed campaign finance penalty(s) for failure to show good cause."

Applicable Code Section:

Va. Code § 24.2-953.6

Background:

Pursuant to § 24.2-953.6 of the Code of Virginia, the Board has discretion to grant relief for campaign finance penalties if good cause is shown that either:

- Circumstances present within a reasonable amount of time of the filing deadline made filing or requesting an extension impracticable; or
- An administrative error occurred in the assessment of the penalty.

Consistent with the Board’s policy, ELECT has scheduled a hearing for 7 appeals and prepared for the Board a summary (including supporting documentation) for each appeal. The list of petitioners are as follows:

Locally Assessed:

1. Friends of Donna Lee Biggs (Portsmouth City)
2. Friends of Sabrina (Fairfax County)
3. Friends of Clark Hedrick (Fairfax County)
4. Kat’s Leadership Committee (Harrisonburg City)

State Assessed:

1. Fight For Fairfax
2. Virginia 3rd District GOP
3. Factocracy, Inc.

State Board Decision

After reviewing all materials and hearing from interested parties, the Board will either grant or dismiss the appeal based on whether good cause is provided. If granted, the Board must decide whether to provide the relief requested or a different amount (or type). The relief provided may include a retroactive extension of the deadline and may not include excusing the requirement to file the required report.

Written Opinion

The Board must issue a written opinion explaining its decision no later than 21 days after the hearing. ELECT will prepare a draft opinion for each appeal and provide it to the Board members for their review within the required timeframe.

Attachments:

- State Board of Elections *Campaign Finance Penalty Appeal Procedures*
- Campaign Finance Penalty Appeals PowerPoint
- Appeal packets (appeals of local-issued penalties)
 - o ELECT summary brief
 - o Petition
 - o Petitioner supporting documentation
 - o General registrar supporting documentation (if provided)
- Appeal packets (appeals of state-issued penalties)
 - o ELECT summary brief
 - o Petition
 - o Petitioner supporting documentation

State Board of Elections Policy 2025-001

A meeting of the Virginia State Board of Elections (SBE) was held on May 27, 2025, during which the following policy was proposed by the Department of Elections (ELECT) and approved by the SBE:

CAMPAIGN FINANCE PENALTY APPEAL PROCEDURES

WHEREAS, the 2025 Acts of Assembly Chapter 360, effective July 1, 2025, amends the Code of Virginia by adding in Article 8 of Chapter 9.3 of Title 24.2 a section numbered 24.2-953.6, relating to campaign finance; appeal of penalties (see attached); and

WHEREAS, Va. Code § 24.2-953.6(A) provides any person or committee assessed a penalty pursuant to Chapter 9.3 of Title 24.2 of the Code of Virginia (Chapter 9.3) the opportunity to file a petition to appeal a campaign finance penalty to the SBE;

WHEREAS, Va. Code § 24.2-953.6(B) provides that the SBE shall develop procedures to conduct a public hearing to consider facts and supporting documentation presented by the petitioner as part of an appeal; and

WHEREAS, Va. Code § 24.2-953.6(C) provides the SBE discretion to provide relief from penalties for good cause shown by the petitioner and found by the SBE sufficient to justify the relief requested.

NOW, THEREFORE, BE IT RESOLVED, by the SBE as directed by Va. Code § 24.2-953.6(B) and under its authority to issue rules and regulations to promote the proper administration of election laws and obtain uniformity in the administration of elections pursuant to Va. Code § 24.2-103(A), that the following policy applies to campaign finance penalty appeal proceedings conducted pursuant to Va. Code § 24.2- 953.6.

Penalty Notices

- Penalty notices issued pursuant to the provisions of Chapter 9.3 must include information about the right to an appeal and the method by which such appeals may be filed.
- For penalties issued by general registrars, ELECT shall direct general registrars to provide the penalty:
 - o via certified mail (general registrars must retain all documentation related to the mailing); and
 - o electronically with confirmation of receipt (when there is an email address on file for the penalized individual/committee).

Petitions

- To file an appeal, an individual or committee issued a penalty under Chapter 9.3 of Title 24.2 must submit a petition on a form prescribed by the SBE.¹
- Petitions must be filed with the Department of Elections (ELECT) electronically or by

¹ Va. Code § 24.2-953.6(A).

certified mail, pursuant to instructions from ELECT.²

- Petitions must be received by ELECT within 60 days of the date of actual receipt of written notice of a penalty.³
 - For penalties issued by ELECT, the actual date of receipt is the next business day after the date notice is sent electronically.
 - For penalties issued by general registrars, the actual date of receipt is the earlier of the date of delivery via certified mail and the date of receipt electronically.
- To submit an appeal, a petition must contain the following:⁴
 - The name and committee code of the penalized committee or, in the case of a penalized individual, the name of the individual.
 - Information about the individual filing the petition, including first and last name, role in the penalized committee (if applicable), and email address;
 - Information about the campaign finance report related to the penalty, including the start and end dates of the filing period and the filing deadline;
 - Information about the issued penalty, including the issuing entity, the date of the penalty, the amount of the penalty, and the date of receipt of the penalty notice;
 - The grounds upon which an appeal is being made; and
 - The relief sought.
- A petitioner should include all relevant information, evidence, and documents necessary to support the stated grounds for appeal.
- ELECT will conduct a facial review of submitted petitions and provide a response in one of the following manners:
 - If the petition contains all required information, issue a notice of hearing; or
 - If the petition does not contain the necessary information to file an appeal or is otherwise improperly filed, issue a notice stating that the appeal has not been properly filed, a hearing has not been scheduled, and that a new/amended petition must be filed by the deadline for a hearing to be scheduled.

Notice of Hearing

Method

- If a petitioner properly files an appeal, ELECT shall provide notice to the petitioner electronically and via certified mail not later than 10 days before the date on which a hearing on the matter will be held.⁵
 - Electronic notice shall be sent to the email addresses (where available/applicable) of the petitioner, candidate, treasurer, custodian of books, and COMET account administrators.
 - Notice via certified mail shall be sent to the address provided by the petitioner.⁶

Contents

- Each notice shall include:

² *Id.*

³ *Id.*

⁴ Va. Code § 24.2-953.6(A).

⁵ Va. Code § 24.2-953.6(B).

⁶ *Id.*

- o The time, date, and place of the hearing;⁷
- o The basic law under which the SBE contemplates its possible exercise of authority; and
- o Contact information consisting of the name, phone number, and government email address of the person designated by the SBE to respond to questions or otherwise assist a named party.

Hearings

Rights of petitioner

- A petitioner shall be entitled to:
 - o Be accompanied by and represented by counsel;
 - o Submit oral and documentary evidence; and
 - o Have a written opinion containing the SBE's decision issued not later than 21 days after the hearing.⁸

Rights of the SBE

- The SBE may:
 - o Administer oaths and affirmations;
 - o Receive oral and documentary evidence;
 - o Exclude irrelevant, immaterial, insubstantial, privileged, or repetitive proofs; and
 - o Regulate and expedite the course of the hearing.

Continuance

- A scheduled hearing shall not be delayed by the inability of the petitioner to attend the hearing unless a request for a continuance is made in writing to ELECT not less than 7 days before the scheduled hearing date.
- A continuance shall not be granted unless the request is received in the required time and, in the opinion of the Chair, sets forth good and sufficient cause for the continuance.
- If a continuance is granted, ELECT staff shall notify all relevant parties of the date to which the proceedings are continued.

Interpreter services

If an interpreter is required, ELECT will make appropriate arrangements to ensure an interpreter is present during the hearing. The petitioner shall provide ELECT reasonable notice before the hearing that an interpreter is required.

Presentation of appeal background by ELECT

- With respect to each appeal, ELECT shall present information to assist the SBE in determining whether relief should be granted.
- In presenting each appeal, ELECT shall provide the factual background related to the issuance of the penalty and the filing of the appeal, and any other information to allow the SBE to review the merits of the appeal, including:

⁷ *Id.*

⁸ Va. Code § 24.2-953.6(D).

- o The name of the penalized committee/individual;
- o The name of the petitioner (if different);
- o The provision(s) of Chapter 9.3 violated;
- o Penalty information, including date of violation, amount, date issued, and date received by committee/individual;
- o Date of receipt of the petition;
- o The relief requested by petitioner;
- o The grounds provided by petitioner for relief;
- o The evidence submitted supporting the petition; and
- o Mitigating/aggravating factors, including but not limited to:
 - Penalty history for the penalized committee/individual;
 - COMET account activity, or attempted activity, of penalized committee/individual within a reasonable time prior to the filing deadline;
 - Attempts by individual/committee to contact ELECT within a reasonable time prior to the filing deadline if experiencing technical difficulties; and
 - Whether a purported technical issue was widespread in nature.

Petitioner testimony

- After presentation of the appeal background by ELECT, the SBE shall invite the petitioner to present relevant testimony and additional supporting evidence.
- Each member of the SBE shall have the opportunity to question the petitioner, ELECT staff, and any other participant in the hearing on all matters related to the petition and testimony and evidence received.

Decision

- At the conclusion of petitioner testimony and SBE questions, the SBE shall:
 - o Carry out further deliberation as necessary; and
 - o Conduct a vote(s) deciding whether to provide relief to the petitioner.
- To provide relief, the SBE must find that the petitioner has demonstrated good cause to justify such relief.
 - o To demonstrate good cause, petitioner must establish either:
 - Facts of circumstances present within a reasonable amount of time of the filing deadline that made filing or requesting an extension impracticable⁹; or
 - An administrative error in the assessment of the penalty.¹⁰
- Relief granted by the SBE:
 - o May include forgiveness of all or a portion of an assessed civil penalty, the retroactive extension of a deadline, or other appropriate remedy.¹¹
 - o May not include an exemption from filing a report that is otherwise required to be filed pursuant to Chapter 9.3.¹²
- The SBE may consider mitigating/aggravating factors presented in determining the extent to which relief is justified.

⁹ Va. Code § 24.2-953.6(B)(i).

¹⁰ Va. Code § 24.2-953.6(B)(ii).

¹¹ Va. Code § 24.2-953.6(C).

¹² *Id.*

Written opinion

- Upon reaching a decision, the SBE shall direct ELECT to draft a written opinion for the SBE's review and issuance.
- The written opinion shall state:
 - The facts put before the SBE;¹³
 - The SBE's decision;¹⁴ and
 - The SBE's rationale for its decision.¹⁵
- The SBE shall issue the final written opinion not later than 21 days after the conclusion of the hearing.¹⁶ The opinion shall be immediately distributed by ELECT in the following manners:
 - Posting on ELECT's website;¹⁷ and
 - By mail to the petitioner.¹⁸

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ Va. Code § 24.2-953.6(D).

¹⁷ *Id.*

¹⁸ *Id.*

VIRGINIA ACTS OF ASSEMBLY - 2025 SESSION

CHAPTER 360

An Act to amend the Code of Virginia by adding in Article 8 of Chapter 9.3 of Title 24.2 a section numbered 24.2-953.6, relating to campaign finance; appeal of penalties.

[S 945]

Approved March 21, 2025

Be it enacted by the General Assembly of Virginia:

1. That the Code of Virginia is amended by adding in Article 8 of Chapter 9.3 of Title 24.2 a section numbered 24.2-953.6 as follows:

§ 24.2-953.6. Appeal of penalties.

A. Any person or committee shall have the right to appeal a civil penalty assessed to it pursuant to this chapter by filing a petition of appeal with the State Board, on a form prescribed by the State Board, within the 60 days following its actual receipt of written notice of such penalty. The petition shall state the grounds upon which the appeal is being made in addition to any additional information required by the State Board.

B. The appeal shall be adjudicated by the State Board in a public hearing. The State Board shall develop procedures for the conduct of such hearing. At least 10 days prior to such hearing, the State Board shall send notice by certified mail to any person whose petitions of appeal will be reviewed at such hearing. Notice shall include the time, date, and place of the hearing.

Consideration on appeal shall be limited to whether the petition and any supporting documents submitted by the petitioner establish (i) facts of circumstances present within a reasonable amount of time of the filing deadline that made filing or requesting an extension impracticable or (ii) an administrative error in the assessment of the penalty.

C. The State Board shall be authorized to provide relief for good cause shown by the petitioner and found by the Board sufficient to justify the relief requested. Such relief may include forgiveness of all or a portion of an assessed civil penalty, the retroactive extension of a deadline, or other appropriate remedy. Such relief shall not include an exemption from filing a report that is otherwise required to be filed pursuant to this chapter.

D. For each appeal that it hears, the State Board shall issue a written opinion, which shall include the facts put before the State Board, the State Board's decision, and the State Board's rationale for reaching such decision. The State Board's opinion shall be published on the Department of Elections website and a copy of the opinion shall be mailed to the petitioner as notice of the State Board's decision not later than 21 days after the conclusion of the appeal hearing. The decision on appeal shall be final and not subject to further appeal.

E. The time for notifying an attorney for the Commonwealth of a violation of this chapter pursuant to subsection F of § 24.2-946.3 shall be tolled from the time the State Board receives a petition of appeal until notification to the petitioner by the State Board of its decision on such petition.

CAMPAIGN FINANCE PENALTY APPEALS

State Board of Elections Meeting



Penalty Appeals, § 24.2-953.6(A)

Any persons or committees assessed a penalty pursuant to Chapter 9.3 of Title 24.2 of the Code of Virginia can file a petition to appeal a campaign finance penalty to the SBE within 60 days of penalty assessment.

Consideration on appeal is limited to whether the petitioner established *one of the following*:

- 1. “Facts of circumstances present within a reasonable amount of time of the filing deadline that made filing or requesting an extension impracticable”**
- 2. “An administrative error in the assessment of the penalty”**

This code provides the SBE discretion to provide relief from penalties for good cause shown by the petition and sufficiently justifies relief requested.

****Penalties: \$100 for the 1st offence within an election cycle, \$1000 for subsequent offences within an election cycle, Late filed SOOs up to \$500).****



Locally Assessed Penalty Petitioners

- Friends of Donna Lee Biggs (Portsmouth City)
- Friends of Sabrina (Fairfax County)
- Friends of Clark Hedrick (Fairfax County)
- Kat's Leadership Committee (Harrisonburg City)



Friends of Donna Lee Biggs

- Report Due: July 27, 2026
- Penalty: \$100, Assessed August 3rd by Portsmouth City General Registrar (April Barnes)
- Basis For Appeal: Circumstances made filing by the deadline, or requesting an extension by the deadline impracticable
- Grounds For Relief: Candidate did not file the report due to lack of technological knowledge.
- Requesting Forgiveness of the Assessed Penalty (\$100)



★ VIRGINIA ★
DEPARTMENT of ELECTIONS

Friends of Donna Lee Biggs

FRIENDS OF DONNA LEE BIGGS LOGIN ACTIVITY

- Committee did not login during the filing period.

COMET User Activity - Login Information

Show 25 entries Search:

User Name	Time Accessed	Details
	4/16/2026 6:06:53 AM	{ "Information": [{ "ResourceInfo": "Password Reset Link Request", "Cont...
	4/16/2026 6:07:33 AM	{ "Information": [{ "ResourceInfo": "Password Link Clicked", "ControllerA...
	4/16/2026 6:17:19 AM	{ "Information": [{ "ResourceInfo": "Password Link Clicked", "ControllerA...
	4/16/2026 6:17:46 AM	{ "Information": [{ "ResourceInfo": "Password Link Clicked", "ControllerA...
	4/16/2026 1:07:44 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	4/16/2026 2:33:49 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	6/17/2026 11:52:27 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	7/15/2026 11:51:28 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	7/15/2026 12:06:32 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	7/15/2026 12:22:49 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	7/27/2026 12:33:54 PM	{ "Information": [{ "ResourceInfo": "Password Reset Link Request", "Cont...
	7/27/2026 12:35:46 PM	{ "Information": [{ "ResourceInfo": "Password Link Clicked", "ControllerA...
	7/27/2026 12:36:45 PM	{ "Information": [{ "ResourceInfo": "Password Changed", "ControllerActi...

Showing 1 to 13 of 13 entries (filtered from 62,573 total entries) < 1 >

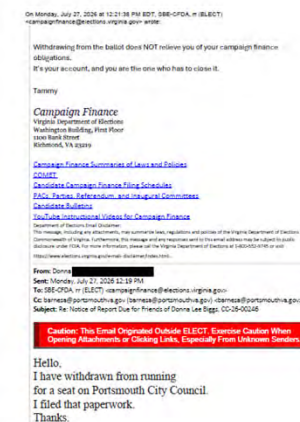
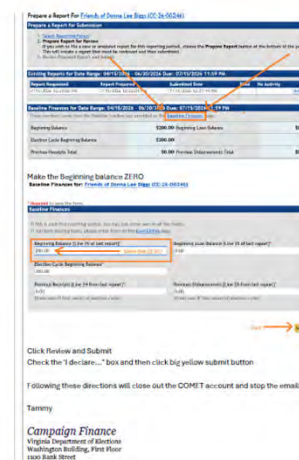
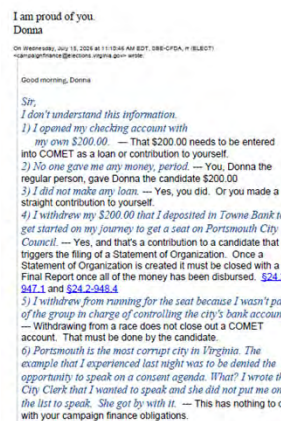
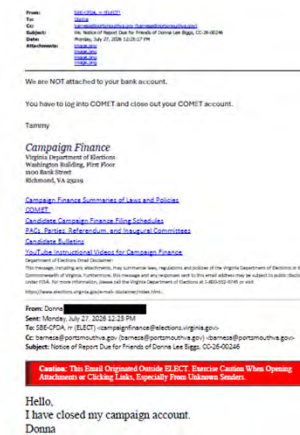
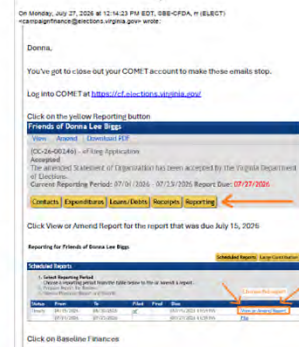


* VIRGINIA *

DEPARTMENT of ELECTIONS

Friends of Donna Lee Biggs

- ELECT has attempted to assist the candidate several times in closing her committee



Friends of Donna Lee Biggs

SUGGESTED MOTIONS:

1. **GRANT, AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$100 assessed penalty*).”
2. **GRANT, NOT AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(state relief to be granted if different than requested).”
3. **DISMISS PETITION:** “Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner’s appeal of the assessed campaign finance penalty(s) for failure to show good cause.”



Friends of Sabrina

- Report Due: July 15, 2026
- Penalty: \$100, Assessed July 22nd by Fairfax County General Registrar(Eric Spicer)
- Basis For Appeal: Circumstances made filing by the deadline, or requesting an extension by the deadline impracticable; Administrative Error
- Grounds For Relief: Candidate was late filing the report due to preparing the report minutes prior to the deadline. The candidate serves as their own treasurer and did not know that they had to enter in certain transactions, which contributed to their late filing.
- Requesting Forgiveness of the Assessed Penalty (\$100)



Friends of Sabrina

- Committee did not login until less than 3 hours to the deadline.

Friends of Sabrina - User Login Activity

COMET User Activity - Login Information

Show 25 entries Search:

User Name	Time Accessed	Details
	1/7/2026 2:16:22 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	2/9/2026 12:09:57 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	2/9/2026 2:00:02 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	2/13/2026 3:17:09 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/15/2026 8:38:35 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/23/2026 12:47:26 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/24/2026 1:30:31 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/24/2026 2:02:07 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/24/2026 3:38:19 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/15/2026 9:31:50 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/27/2026 11:25:52 PM	{ "Information": [{ "ResourceInfo": "Login Failure", "ControllerAction": "A..."
	7/27/2026 11:26:07 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."

Showing 1 to 12 of 12 entries (filtered from 61,921 total entries)



★ VIRGINIA ★
DEPARTMENT of ELECTIONS

Friends of Sabrina

- Committee received three email reminders for the reporting deadline

Hogle, Lisa K.

From: Hogle, Lisa K.
Sent: Wednesday, July 15, 2026 3:39 PM
Cc: Ardalan, Bushra
Subject: Important Info for Local Office Candidates

Good afternoon!
We wanted to provide you with some important candidate-related information found on the Virginia Department of Elections website. Below is the link to the Amended 2026 Candidate Reporting Deadlines.

[2026 Candidate Reporting Deadlines schedule](#)

Contact cfda@elections.virginia.gov with any questions regarding filing through COMET.
Regards,
Lisa Hogle
Candidate Services Manager
Fairfax County Office of Elections
www.fairfaxcounty.gov/elections

Friends of Sabrina – Email Reminders Sent Prior to Deadline

Reporting Period for Friends of Sabrina - CC-26-00014

Report Type: Scheduled

Filing Status: Late

Begin Date: 04/01/2026

End Date: 06/30/2026

Due Date: 07/15/2026 11:59 PM

Date Filed: 07/16/2026 12:00 AM

Submitted On	Submitted By	Is Amendment?	Final Report
7/16/2026 12:00:06 AM		No	View Report

Emails

View Email	Subject	When	Who	Email Sent
View Email	07/15/2026 Report Received	07/16/2026 12:00 AM	Bryce, Sabrina	Sent
View Email	Report Filed by Friends of Sabrina, CC-26-0...	07/16/2026 12:00 AM	Bryce, Sabrina	Sent

Emails

View Email	Subject	When	Who	Email Sent
View Email	Notice of Report Due for Friends of Sabri...	07/09/2026 6:18 AM	Agent, SQL Exec...	Sent
View Email	Notice of Report Due for Friends of Sabri...	07/15/2026 6:09 AM	Agent, SQL Exec...	Sent

Notes

Attachments



Friends of Sabrina

SUGGESTED MOTIONS:

1. **GRANT, AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$100 assessed penalty*).”
2. **GRANT, NOT AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(state relief to be granted if different than requested).”
3. **DISMISS PETITION:** “Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner’s appeal of the assessed campaign finance penalty(s) for failure to show good cause.”



Friends of Clark Hedrick

- Report Due: July 27, 2026
- Penalty: \$100, Assessed July 29th by Fairfax County General Registrar(Eric Spicer)
- Basis For Appeal: Circumstances made filing by the deadline, or requesting an extension by the deadline impracticable
- Grounds For Relief: Candidate did not see the notifications that the filing deadline changed and did not check their emails to see the notifications, due to professional obligations.
- Requesting Forgiveness of the Assessed Penalty (\$100)



★ VIRGINIA ★
DEPARTMENT of ELECTIONS

Friends of Clark Hedrick

- Committee did not login during the filing period.

LOGIN ACTIVITY FOR FRIENDS OF CLARK HEDRICK

COMET User Activity - Login Information

Show entries Search:

User Name	Time Accessed	Details
	1/2/2026 9:03:29 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	3/5/2026 10:04:53 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/2/2026 6:04:10 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/12/2026 11:50:29 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/29/2026 5:35:02 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."

Showing 1 to 5 of 5 entries (filtered from 62,354 total entries) < 1 >



★ VIRGINIA ★
DEPARTMENT of ELECTIONS

Friends of Clark Hedrick

- Committee received four email reminders for the reporting deadline and 2026 schedule update

Hogle, Lisa K.

From: Hogle, Lisa K.
Sent: Wednesday, July 15, 2026 3:39 PM
Cc: Ardalan, Bushra
Subject: Important Info for Local Office Candidates

Good afternoon!
We wanted to provide you with some important candidate-related information found on the Virginia Department of Elections website. Below is the link to the Amended 2026 Candidate Reporting Deadlines.

[2026 Candidate Reporting Deadlines schedule](#)

Contact cfda@elections.virginia.gov with any questions regarding filing through COMET.
Regards,
Lisa Hogle
Candidate Services Manager
Fairfax County Office of Elections

MAIL REMINDERS:

Reporting Period for Friends of Clark Hedrick - CC-20-00309

Report Type:	Scheduled
Filing Status:	Late #
Begin Date:	07/01/2026
End Date:	07/23/2026
Due Date:	07/27/2026 11:59 PM
Date Filed:	07/29/2026 3:33 PM

Submitted On	Submitted By	Is Amendment?	Final Report
7/26/2026 3:33 PM		No	View Report

Emails

View Email	Subject	When	Who	Email Sent
View Email	07/27/2026 Report Received	07/29/2026 3:33 PM	Hedrick, Clark	Sent
View Email	Report Filed by Friends of Clark Hedrick, CC...	07/29/2026 3:33 PM	Hedrick, Clark	Sent

Emails

View Email	Subject	When	Who	Email Sent
View Email	Notice of Report Due for Friends of Clark...	07/19/2026 6:02 AM	Agent, SCS, Inc...	Sent
View Email	Notice of Report Due for Friends of Clark...	07/26/2026 6:02 AM	Agent, SCS, Inc...	Sent

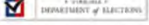
Friends of Clark Hedrick - CC-20-00309

Contacts

Committee: Friends of Clark Hedrick

Subject: Updates in Campaign Finance

Email Content:



July 1, 2026, marked the start of \$242,948.6 pertaining to the use of campaign funds. The Candidate Campaign Committee Summary of Laws and Policies has been updated to reflect this new information for candidate committees. You can find the Candidate Campaign Committee Summary of Laws and Policies on this page of our website.

<https://www.elections.virginia.gov/candidatepac-info/regulation-and-policies/>

For candidate committees with elections on the 2026 November ballot, please, remember that today is the start of the filing period for the July 27, 2026, deadline. File today, so you can enjoy your weekend!

Today also marks the start of the first large pre-election contribution reporting (LCR) period for offices on the 2026 November ballot. The local threshold is \$500. Any contribution received in the amount of \$500 or more must be reported by the next day except for contributions received the day before the primary date or the November election date which must be filed the same day.

This year's two LCR periods are

July 24 through August 3
and
October 23 through November 2

Email History

View Email	Subject	When	Who	Email Sent
View Email	Updates in Campaign Finance	07/24/2026 12:14 PM	Alexander, Tammy	Sent
View Email	Updates in Campaign Finance	07/24/2026 12:14 PM	Alexander, Tammy	Sent
View Email	Updates in Campaign Finance	07/24/2026 12:14 PM	Alexander, Tammy	Sent
View Email	Amended 2026 Filing Schedule	03/24/2026 11:37 AM	Alexander, Tammy	Sent
View Email	Amended 2026 Filing Schedule	03/24/2026 11:37 AM	Alexander, Tammy	Sent
View Email	Amended 2026 Filing Schedule	03/24/2026 11:37 AM	Alexander, Tammy	Sent

Subject: Amended 2026 Filing Schedule

Email Content:



Good afternoon,

2026 Primary date has been moved to August 4, 2026. This change requires a change to the annual filing schedule for committees with Statements of Organization for offices on the 2026 ballot. Reports are due regardless of whether the candidate has achieved ballot access or not.

Please, log into COMET to view the new schedule under the Yellow Reporting Button or the Red Reporting Button.

You can also print out a paper version of the filing schedule from this link on our website: <https://www.elections.virginia.gov/media/forms/warehouses/campaign-finance/2026/AMENDED-2026-Candidate-Reporting-Deadlines-example.pdf>

Please, enter these dates on your calendars and in your phone notifications.

You can file your report as soon as the activity end date passes.

For example:
You can file as early as April 1st for the report that's due April 15th
You can file July 1st for the report due July 15th
You can file July 24th for the report due July 27th, etc.

Don't wait until the last day!

Also make note of the two large pre-election contributions filing periods. These are the 11 days prior to August 4th and the 11 days prior to November 3rd.

July 24th - August 3rd, 2026
October 23rd - November 2nd, 2026

Please, make sure you are familiar with the Summary of Laws and Policies found on the side of our website.



Friends of Clark Hedrick

SUGGESTED MOTIONS:

1. **GRANT, AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$100 assessed penalty*).”
2. **GRANT, NOT AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(state relief to be granted if different than requested).”
3. **DISMISS PETITION:** “Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner’s appeal of the assessed campaign finance penalty(s) for failure to show good cause.”



Kat's Leadership Committee

- Report Due: July 27, 2026
- Penalty: \$100, Assessed July 29th by Harrisonburg City General Registrar (Mark Finks)
- Basis For Appeal: Circumstances made filing by the deadline, or requesting an extension by the deadline impracticable; Administrative Error
- Grounds For Relief: Candidate filed an amendment to a previous report unintentionally, believing it to be the required report, which was due.
- Requesting Forgiveness of the Assessed Penalty (\$100)



Kat's Leadership Committee

- Committee did not login until less than 2 hours until the deadline.

Kat's Leadership Committee – User Login Activity

COMET User Activity - Login Information

Show 25 entries Search:

User Name	Time Accessed	Details
	4/8/2026 9:14:03 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/8/2026 9:40:27 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/9/2026 1:55:40 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/9/2026 5:08:41 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/9/2026 6:41:52 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/10/2026 10:21:30 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/10/2026 5:37:33 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/13/2026 9:49:10 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/14/2026 10:55:58 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/15/2026 7:30:07 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/20/2026 4:45:10 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/15/2026 9:31:00 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/15/2026 9:53:40 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/27/2026 10:49:38 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/28/2026 12:46:17 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/28/2026 11:06:53 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."

Showing 1 to 16 of 16 entries (filtered from 61,943 total entries)



★ VIRGINIA ★
DEPARTMENT of ELECTIONS

Kat's Leadership Committee

- Committee received four email reminders for the reporting deadline

From: Mark D. Finks
Bcc: [REDACTED]
Subject: Campaign Finance Deadline Monday Night (July 27th)
Date: Sunday, July 26, 2026 5:19:00 PM
Attachments: [example.pdf](#)
Importance: High

Hello Everyone,

This is a reminder that Monday night is a campaign finance deadline. I'm contacting you because as of the time of this email I have not received confirmation from COMET that your campaign has filed a report for this period.

If you are unable to file your report in COMET by Monday's deadline your campaign committee will be subject to fines listed under state code [§ 24.2-953.2](#). You still must submit a report even if you didn't have any activity during this time period.

My office will not always be able to send this reminder email, so please remember to review the 2026 amended deadlines: <https://www.elections.virginia.gov/media/formswarehouse/campaign-finance/2026/AMENDED-2026-Candidate-Reporting-Deadlines-example.pdf>

Take care,

Mark Finks

Director of Elections / General Registrar
City of Harrisonburg

Kat's Leadership Committee - CC-26-00220 X

Contacts

Committee	Kat's Leadership Committee	[REDACTED]
Treasurer	Kathy Hendley	[REDACTED]

Subject: Updates in Campaign Finance

Email Content:



July 1, 2026, marked the start of \$24.2-948.6 pertaining to the use of campaign funds. The Candidate Campaign Committee Summary of Laws and Policies has been updated to reflect this new information for candidate committees. You can find the Candidate Campaign Committee Summary of Laws and Policies on this page of our website.

<https://www.elections.virginia.gov/candidatepac-info/regulation-and-policies/>

For candidate committees with elections on the 2026 November ballot, please, remember that today is the start of the filing period for the July 27, 2026, deadline. File today, so you can enjoy your weekend!

Today also marks the start of the first large pre-election contribution reporting (LCR) period for offices on the 2026 November ballot. The local threshold is \$500. Any contribution received in the amount of \$500 or more must be reported by the next day except for contributions received the day before the primary date or the November election date which must be filed the same day.

This year's two LCR periods are

July 24 through August 3
and
October 23 through November 2

All candidate committees are required to keep all their financial records pursuant to §24.2-947.3.

This year's Campaign Finance Reports and Records Review drawing will take place after the January 15, 2027 deadline which closes out the election cycle for those offices on the 2026 November General Election ballot. The date and time of the drawing will be announced later this year. You will be contacted via the email contact information you provide(d) on your Statement of Organization in the event you are chosen in the random drawing. Keep tidy records to make this process easy.

Remember that if you have any questions regarding campaign finance, we welcome your emails at CFDA@elections.virginia.gov

Contact the Department of Elections if you have any questions.

Department of Elections
Campaign Finance
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219
800-652-9745

Sent: 7/24/2026 12:43:00 PM

Sent By: Entered by: Alexander, Tammy
Sent From: cfda@elections.virginia.gov

Kat's Leadership Committee – Email Reminders Sent Prior to Deadline

Reporting Period for Kat's Leadership Committee - CC-26-00220 X

Report Type:	Scheduled
Filing Status:	Late ⚠️
Begin Date:	07/01/2026
End Date:	07/23/2026
Due Date:	07/27/2026 11:59 PM
Date Filed:	07/28/2026 11:16 PM

Submitted On	Submitted By	Is Amendment?	Final Report
7/28/2026 11:16:34 PM	[REDACTED]	No	View Report

Emails

View Email	Subject	When	Who	Email Sent
View Email	07/27/2026 Report Received	07/28/2026 11:17 PM	Hendley, Kathy	Sent
View Email	Report Filed by Kat's Leadership Committe...	07/28/2026 11:17 PM	Hendley, Kathy	Sent

Emails

View Email	Subject	When	Who	Email Sent
View Email	Notice of Report Due for Kat's Leadershi...	07/19/2026 6:13 AM	Agent, SQI, Exec...	Sent
View Email	Notice of Report Due for Kat's Leadershi...	07/26/2026 6:09 AM	Agent, SQI, Exec...	Sent

Notes

Attachments



Kat's Leadership Committee

SUGGESTED MOTIONS:

1. **GRANT, AS REQUESTED:** "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$100 assessed penalty*)."
2. **GRANT, NOT AS REQUESTED:** "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(state relief to be granted if different than requested)."
3. **DISMISS PETITION:** "Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner's appeal of the assessed campaign finance penalty(s) for failure to show good cause."



State Assessed Penalty Petitioners

- Fight for Fairfax
- Virginia 3rd District GOP
- Factocracy, Inc.



Fight For Fairfax

- Report Due: June 1, 2026
- Penalty: \$1,000, Assessed June 2nd by ELECT
- Basis For Appeal: Circumstances made filing by the deadline, or requesting an extension by the deadline impracticable
- Grounds For Relief: Financial Hardship, and petitioner has a disability that impacts their memory and their ability to remember the deadline.
- Requesting Forgiveness of the Assessed Penalty (\$1,000)



★ VIRGINIA ★
DEPARTMENT of ELECTIONS

Fight for Fairfax

- Committee received two email reminders for the reporting deadline

Reporting Period for Fight For Fairfax - PAC-22-00038 X

Report Type: Scheduled

Filing Status: Late 🚩

Begin Date: 04/01/2026

End Date: 05/25/2026

Due Date: 06/01/2026 11:59 PM

Date Filed: 06/22/2026 6:29 PM

Submitted On	Submitted By	Is Amendment?	Final Report
6/22/2026 6:29:42 PM			No View Report

Emails

View Email	Subject	When	Who	Email Sent
View Email	06/01/2026 Report Received	06/22/2026 6:30 PM	Bonnie Amiri	Sent

Emails

View Email	Subject	When	Who	Email Sent
View Email	Notice of Report Due for Fight For Fairfa...	05/25/2026 6:06 AM	Agent, SQL Exec...	Sent
View Email	Notice of Report Due for Fight For Fairfa...	05/31/2026 6:13 AM	Agent, SQL Exec...	Sent

Notes

Attachments



★ VIRGINIA ★
DEPARTMENT of ELECTIONS

Fight For Fairfax

- Committee did not login during the filing period.

COMET User Activity - Login Information

Show 10 entries Search: [REDACTED]

User Name	Time Accessed	Details
[REDACTED]	9/22/2025 4:44:51 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
[REDACTED]	9/22/2025 4:48:13 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
[REDACTED]	9/22/2025 4:56:48 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
[REDACTED]	10/18/2025 11:08:12 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
[REDACTED]	1/15/2026 11:57:05 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
[REDACTED]	6/22/2026 9:43:15 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
[REDACTED]	6/22/2026 9:52:48 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
[REDACTED]	6/22/2026 6:28:55 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
[REDACTED]	6/23/2026 8:47:08 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
[REDACTED]	7/1/2026 12:33:29 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."

Showing 1 to 10 of 11 entries (filtered from 55,754 total entries)

< 1 2 >



Fight For Fairfax

SUGGESTED MOTIONS:

1. **GRANT, AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$1000 assessed penalty*).”
2. **GRANT, NOT AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(state relief to be granted if different than requested).”
3. **DISMISS PETITION:** “Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner’s appeal of the assessed campaign finance penalty(s) for failure to show good cause.”



Virginia 3rd District GOP

- Report Due: July 15, 2026
- Penalty: \$1,000, Assessed July 16th by ELECT
- Basis For Appeal: Circumstances made filing by the deadline, or requesting an extension by the deadline impracticable
- Grounds For Relief: Petitioner states that due to organization changes, the new treasurer did not have access to the committee to file reports in COMET. The Treasurer was unable to contact the previous Treasurer to get access to the filing system, due to the previous Treasurer moving out-of-state.
- Requesting Forgiveness of the Assessed Penalty (\$1,000)



★ VIRGINIA ★
 DEPARTMENT of ELECTIONS
 Virginia 3rd District GOP

- Committee received three email reminders for the reporting deadline

EMAIL REMINDERS FOR VIRGINIA 3RD DISTRICT GOP

Reporting Period for Virginia 3rd District GOP - PP-12-00626 X

Report Type:
 Filing Status:
 Begin Date:
 End Date:
 Due Date:
 Date Filed:

Scheduled
 Late 🚩
 04/01/2026
 06/30/2026
 07/15/2026 11:59 PM
 08/10/2026 7:58 PM

Submitted On	Submitted By	Is Amendment?	Final Report
8/10/2026 7:58:41 PM	[REDACTED]		No View Report

Emails

View Email	Subject	When	Who	Email Sent
View Email	07/15/2026 Report Received	08/10/2026 7:59 PM	Goodwin, Anth...	Sent

Emails

View Email	Subject	When	Who	Email Sent
View Email	Notice of Report Due for Virginia 3rd Dis...	07/05/2026 6:19 AM	Agent, SQL Exec...	Sent
View Email	Notice of Report Due for Virginia 3rd Dis...	07/12/2026 6:16 AM	Agent, SQL Exec...	Sent
View Email	Notice of Report Due for Virginia 3rd Dis...	07/12/2026 6:16 AM	Agent, SQL Exec...	Sent

Notes

Attachments



★ VIRGINIA ★
 DEPARTMENT of ELECTIONS
 Virginia 3rd District GOP

- Committee emailed ELECT on July 15, requesting assisting for the filing deadline (getting access)

From: [SBE-CFDA - \(ELECT\)](#)
 To: [Anthony Goodwin SBE-CFDA - \(ELECT\)](#)
 Subject: RE: VA 3rd District GOP PP-12-00636
 Date: Wednesday, July 15, 2026 10:57:00 AM

Good Morning,

We cannot file reports for committees, that is their responsibility. If you do not have access to your committee then you need to get access with your admins, who are Miki Miller and Anna Laethem. Please contact them to get you access.

Thank you,
 Emily Mynarski
 Campaign Finance Training and Compliance Specialist
 Department of Elections
Emily.Mynarski@elections.virginia.gov

Campaign Finance Filing Resources:
[Virginia Department of Elections Campaign Finance Tutorials - YouTube](#)
[Candidate Campaign Committee Laws Summary](#)
[Campaign Finance Laws and Policies](#)
[COMET Login Portal](#)

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From: Anthony Goodwin
 Sent: Wednesday, July 15, 2026 10:37 AM
 To: SBE-CFDA, re (ELECT) <cfda@elections.virginia.gov>
 Subject: VA 3rd District GOP PP-12-006266

Caution: This Email Originated Outside ELECT. Exercise Caution When Opening Attachments or Clicking Links, Especially From Unknown Senders.

I have been the treasurer of the 3rd district GOP since the first of the year and I have yet to be able to log in to file the reports. The past Treasurers are no longer available to make the change and add me. Please help me fix this to not be assessed another late filing fee. If someone in the office has access to the account could we request the numbers be inputted to show no activity in both time periods presently and before.

I will be in Richmond on Monday the 20th and I would like to request a time to meet face to face and solve this problem.

Thank you,
 Tony Goodwin
 Treasurer 3rd District GOP
 --



Making it A Good Win for Buyer's,
 Seller's, and Your Community!
 Mobile: [REDACTED]



Virginia 3rd District GOP

SUGGESTED MOTIONS:

1. **GRANT, AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$1000 assessed penalty*).”
2. **GRANT, NOT AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(state relief to be granted if different than requested).”
3. **DISMISS PETITION:** “Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner’s appeal of the assessed campaign finance penalty(s) for failure to show good cause.”



Factocracy, Inc.

- Report Due: June 1, 2026
- Penalty: \$100, Assessed August 15th by ELECT
- Basis For Appeal: Circumstances made filing by the deadline, or requesting an extension by the deadline impracticable
- Grounds For Relief: Petitioner states that the committee did not know that they were legally required to file campaign finance reports.
- Requesting Forgiveness of the Assessed Penalty (\$100)



★ VIRGINIA ★
DEPARTMENT of ELECTIONS

Factocracy, Inc.

- Committee did not file the Statement of Organization until August 14, 2026.

Factocracy, Inc. - PAC-26-00051 - Amended Print SOO
 Submitted By [Myer, Cynthia](#) On: 08/14/2026

Previous SOO Changes ▼

Previous Status: Rejected - [View](#) Date Changes Took Effect: 08/14/2026 Version: 3 of 3

Reason: Please complete address section for Principal Custodian

Accepted 08/14/2026 by [Mynarski, Emily](#) COMET Users

Open/Close All? ☰

SOO History ▲

Submitted On	Submitted By	Status	Rejection Reason	Version
08/13/2026 4:53 PM	Myer, Cynthia	Rejected	Please complete address section for Principal Custodian	2
08/13/2026 3:45 PM	Myer, Cynthia	Rejected	Please complete the Principal Custodian section	1

Scheduled Reports ▼

Report Penalties ▼

No Committee Penalties Generated [Add](#)

Email History ▼

Notes ▼

Attachments ▼

Committee Information ▼

Area, Scope, and Jurisdiction ▼

Treasurer Information ▼

Principal Custodian Information ▼

Additional Officers (optional) ▼

Primary Financial Institution ▼

Secondary Financial Institution ▼

Address Where Books are Maintained ▼

Committee Activity ▲

Date contributions exceeded \$200:

06/13/2026

Date expenditures exceeded \$200:

07/30/2026

Date Committee Depository Designated:

04/14/2026

Date Treasurer Appointed:

04/14/2026



Factocracy, Inc.

SUGGESTED MOTIONS:

1. **GRANT, AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$100 assessed penalty*).”
2. **GRANT, NOT AS REQUESTED:** “Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(state relief to be granted if different than requested).”
3. **DISMISS PETITION:** “Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner’s appeal of the assessed campaign finance penalty(s) for failure to show good cause.”



Written Opinion

The SBE will issue the final written opinion not later than 21 days from the conclusion of this hearing.

The opinion will be distributed by ELECT via:

- Posting on ELECT's website
- Mail to the petitioner
- Email to the petitioner (and General Registrar, if applicable)



FRIENDS OF DONNA LEE BIGGS (CC-26-00246)

BASIS FOR APPEAL:

Filing Report/Requesting Extension Impracticable by Deadline

GROUND(S) FOR RELIEF:

Candidate did not file the report due to lack of technological knowledge.

REPORT(S) APPEALED:

7/27/2026

- Penalty Assessed (\$100) 8/3/2026 by Portsmouth City General Registrar
(April Barnes)

RELIEF REQUESTED:

Forgiveness of Assessed Penalty (\$100)

LATE FILING STORY:

4/16/2018
6/4/2018
7/16/2018

AGGRAVATING FACTOR(S):

Committee had 4 days to file the report.
Candidate received 3 email reminders for the deadline.
Candidate has not logged in to COMET since the July 15th deadline.

SUGGESTED MOTIONS:

GRANT, AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$100 assessed penalty.*)"

GRANT, NOT AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(*state relief to be granted if different than requested.*)"

DISMISS PETITION: "Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner's appeal of the assessed campaign finance penalty(s) for failure to show good cause."

ELECT COMMENT(S):

ELECT has attempted to assist the candidate with their filings; however, the candidate is unresponsive to ELECT's attempts of assistance.

**APPEAL PETITION
AND PETITIONER
SUPPLIED DOCUMENTS**

Penalty Appeal for Individual: Donna L Biggs

Petitioner Information

Email Address: [REDACTED]

First Name: Donna

Middle Name: L

Last Name: Biggs

Role in Committee: Treasurer

Address Line 1: 3104 Garland Drive

Address Line 2:

Suite:

City: Portsmouth State: VA Zip: 23703

Phone Number: [REDACTED]

Are you appealing a penalty issued to a Committee or Individual? Individual

Penalized Individual Information

Full Name: Donna L Biggs

Relationship: Candidate

Address Line 1: 3104 Garland Drive

Address Line 2:

Suite:

City: Portsmouth State: VA Zip: 23703

Phone Number: [REDACTED]

Email Address: [REDACTED]

Report Information

Filing Period Start: 7/1/2026 12:00:00 AM

Filing Period End: 7/23/2026 12:00:00 AM

Filing Deadline for Report: 7/27/2026 12:00:00 AM

Date Report was Submitted: 7/15/2026 12:00:00 AM

Penalty Information

Issuing Entity: Virginia Dept. of Elections

Invoice Number: 9589071052701856820542

Date of Penalty: 8/3/2026 12:00:00 AM

Amount of Penalty: \$100.00

Date of Receipt of Penalty Notice: 8/3/2026 12:00:00 AM

Appeal Information

Reason for Appeal:

- Circumstances made filing the required report or requesting an extension by the deadline impracticable.

Grounds for Appeal: On July 15, 2026, the election office reported that the report was incomplete. I had called the election office to report that I didnt know how to use the comet for the financial reporting. The clerk did not help me learn how to use the Comet pages to correct the error.

Relief Sought: The relief sought is for someone to help me delete the financial dollars off the report. The issue is lack of knowledge of the method to use electronics for reporting with no help from the superior assistants.

Notes

Attachments

Choose File

No file chosen

Enter Attachment Name Here

Enter Attachment Comment

Select a Type

Add

No Attachments

**ELECT
SUPPORTING
DOCUMENT(S)**

FRIENDS OF DONNA LEE BIGGS LOGIN ACTIVITY

COMET User Activity - Login Information

Show 25 entries

Search:

User Name	Time Accessed	Details
	4/16/2026 6:06:53 AM	{ "Information": [{ "ResourceInfo": "Password Reset Link Request", "Cont...
	4/16/2026 6:07:33 AM	{ "Information": [{ "ResourceInfo": "Password Link Clicked", "ControllerA...
	4/16/2026 6:17:19 AM	{ "Information": [{ "ResourceInfo": "Password Link Clicked", "ControllerA...
	4/16/2026 6:17:46 AM	{ "Information": [{ "ResourceInfo": "Password Link Clicked", "ControllerA...
	4/16/2026 1:07:44 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	4/16/2026 2:33:49 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	6/17/2026 11:52:27 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	7/15/2026 11:51:28 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	7/15/2026 12:06:32 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	7/15/2026 12:22:49 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction...
	7/27/2026 12:33:54 PM	{ "Information": [{ "ResourceInfo": "Password Reset Link Request", "Cont...
	7/27/2026 12:35:46 PM	{ "Information": [{ "ResourceInfo": "Password Link Clicked", "ControllerA...
	7/27/2026 12:36:45 PM	{ "Information": [{ "ResourceInfo": "Password Changed", "ControllerActi...

Showing 1 to 13 of 13 entries (filtered from 62,573 total entries)

< 1 >

From: [SBE-CFDA, rr \(ELECT\)](#)
To: [Donna](#)
Cc: barnesa@portsmouthva.gov (barnesa@portsmouthva.gov)
Subject: Re: Notice of Report Due for Friends of Donna Lee Biggs, CC-26-00246
Date: Monday, July 27, 2026 12:25:17 PM
Attachments: [image.png](#)
[image.png](#)
[image.png](#)
[image.png](#)

We are NOT attached to your bank account.

You have to log into COMET and close out your COMET account.

Tammy

Campaign Finance

Virginia Department of Elections
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219

[Campaign Finance Summaries of Laws and Policies](#)

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<https://www.elections.virginia.gov/e-mail-disclaimer/index.html>.

From: Donna [REDACTED]
Sent: Monday, July 27, 2026 12:23 PM
To: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>
Cc: barnesa@portsmouthva.gov (barnesa@portsmouthva.gov) <barnesa@portsmouthva.gov>
Subject: Notice of Report Due for Friends of Donna Lee Biggs, CC-26-00246

Caution: This Email Originated Outside ELECT. Exercise Caution When Opening Attachments or Clicking Links, Especially From Unknown Senders.

Hello,
I have closed my campaign account.
Donna

On Monday, July 27, 2026 at 12:21:38 PM EDT, SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov> wrote:

Withdrawing from the ballot does NOT relieve you of your campaign finance obligations.

It's your account, and you are the one who has to close it.

Tammy

Campaign Finance

Virginia Department of Elections
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219

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<https://www.elections.virginia.gov/e-mail-disclaimer/index.html>.

From: Donna [REDACTED]

Sent: Monday, July 27, 2026 12:19 PM

To: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>

Cc: barnesa@portsmouthva.gov (barnesa@portsmouthva.gov) <barnesa@portsmouthva.gov>

Subject: Re: Notice of Report Due for Friends of Donna Lee Biggs, CC-26-00246

Caution: This Email Originated Outside ELECT. Exercise Caution When Opening Attachments or Clicking Links, Especially From Unknown Senders.

Hello,

I have withdrawn from running
for a seat on Portsmouth City Council.

I filed that paperwork.

Thanks.

Donna Biggs

Land Line Only

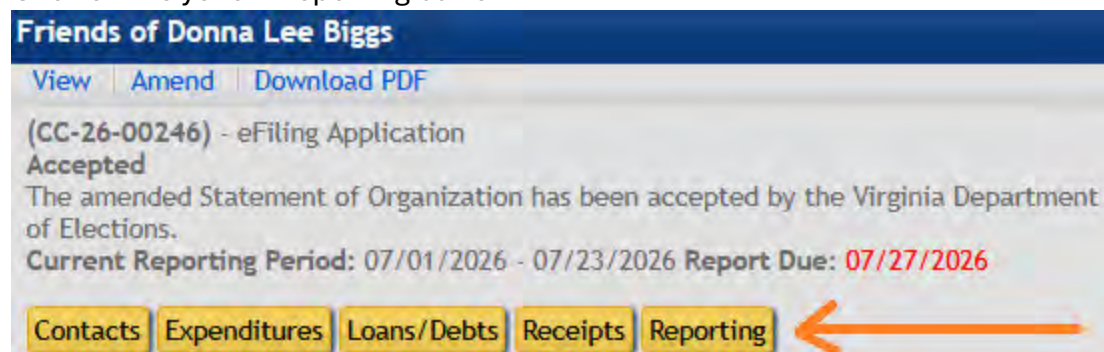
On Monday, July 27, 2026 at 12:14:23 PM EDT, SBE-CFDA, rr (ELECT)
<campaignfinance@elections.virginia.gov> wrote:

Donna,

You've got to close out your COMET account to make these emails stop.

Log into COMET at <https://cf.elections.virginia.gov/>

Click on the yellow Reporting button



Click View or Amend Report for the report that was due July 15, 2026

Reporting for Friends of Donna Lee Biggs

Scheduled Reports					
1. Select Reporting Period Choose a reporting period from the table below to file or amend a report. 2. Prepare Report for Review 3. Review Prepared Report and Submit					
Status	From	To	Filed	Final	Due
Timely	04/15/2026	06/30/2026	✓		07/15/2026 11:59 PM
	07/01/2026	07/23/2026			07/27/2026 11:59 PM
					View or Amend Report
					File

Click on Baseline Finances

Prepare a Report For [Friends of Donna Lee Biggs \(CC-26-00246\)](#)

Prepare a Report for Submission

1. [Select Reporting Period](#)
2. **Prepare Report for Review**
If you wish to file a new or amended report for this reporting period, choose the **Prepare Report** button at the bottom of the page. This will create a report that must be reviewed and then submitted.
3. Review Prepared Report and Submit

Existing Reports for Date Range: 04/15/2026 - 06/30/2026 Due: 07/15/2026 11:59 PM

Report Requested	Report Prepared	Submitted Date	Final	No Activity	
7/15/2026 12:21:03 PM	7/15/2026 12:22:01 PM	7/15/2026 12:27:14 PM			View

Baseline Finances for Date Range: 04/15/2026 - 06/30/2026 Due: 07/15/2026 11:59 PM

These numbers come from the Baseline number you provided on the [Baseline Finances](#) page.

Beginning Balance	\$200.00	Beginning Loan Balance	\$0.00
Election Cycle Beginning Balance	\$200.00		
Previous Receipts Total	\$0.00	Previous Disbursements Total	\$0.00

Make the Beginning balance ZERO

Baseline Finances for: [Friends of Donna Lee Biggs \(CC-26-00246\)](#)

* Required to save the form.

Baseline Finances

If this is your first reporting period, you may just enter zero in all the fields.

If you have existing loans, please enter them on the [Loan Listing](#) page.

Beginning Balance [Line 19 of last report]* 200.00	Beginning Loan Balance [Line 15 of last report]* 0.00
Election Cycle Beginning Balance* 200.00	
Previous Receipts [Line 24 from last report]* 0.00 (Enter zero if first report of election cycle)	Previous Disbursements [Line 28 from last report]* 0.00 (Enter zero if first report of election cycle)

Click  [Save](#)

Click Review and Submit

Check the "I declare..." box and then click big yellow submit button

Following these directions will close out the COMET account and stop the emails.

Tammy

Campaign Finance

Virginia Department of Elections
Washington Building, First Floor
1100 Bank Street

Richmond, VA 23219

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<https://www.elections.virginia.gov/e-mail-disclaimer/index.html>.

From: SBE - INFO, rr (ELECT) <INFO@elections.virginia.gov>

Sent: Monday, July 27, 2026 11:01 AM

To: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>

Subject: FW: Notice of Report Due for Friends of Donna Lee Biggs, CC-26-00246

FYI

From: Donna [REDACTED]

Sent: Sunday, July 26, 2026 6:48 AM

To: SBE - INFO, rr (ELECT) <info@elections.virginia.gov>

Subject: Notice of Report Due for Friends of Donna Lee Biggs, CC-26-00246

Caution: This Email Originated Outside ELECT. Exercise Caution When Opening Attachments or Clicking Links, Especially From Unknown Senders.

Hello,

Please get your operations manager organized.

I withdrew from running for a seat on city council.

Thanks.

Donna Biggs

[REDACTED]

Land Line Only

On Sunday, July 26, 2026 at 06:09:13 AM EDT, <info@elections.virginia.gov> wrote:

|

Please note that your committee has a report due on 7/27/2026 11:59:59 PM for all activity occurring between 7/1/2026 and 7/23/2026.

See "Review and Submit Report" section in the linked document below for instructions.

<https://www.elections.virginia.gov/media/formswarehouse/campaign-finance/comet/COMETQuickGuide.pdf>

Department of Elections
Campaign Finance
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219
800-552-9745
cfda@elections.virginia.gov

From: [SBE-CFDA, rr \(ELECT\)](#)
To: [Donna](#)
Cc: barnesa@portsmouthva.gov (barnesa@portsmouthva.gov)
Subject: Re: Notice of Report Due for Friends of Donna Lee Biggs, CC-26-00246
Date: Wednesday, July 15, 2026 11:56:30 AM

I know you can do it, Donna, because you've done it four other times.

Just log into COMET and file that one and only report as a Final and be done.

Tammy

Campaign Finance

Virginia Department of Elections
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219

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[COMET](#)

[Candidate Campaign Finance Filing Schedules](#)

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<https://www.elections.virginia.gov/e-mail-disclaimer/index.html>.

From: Donna [REDACTED]
Sent: Wednesday, July 15, 2026 11:17 AM
To: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>
Cc: barnesa@portsmouthva.gov (barnesa@portsmouthva.gov) <barnesa@portsmouthva.gov>
Subject: Notice of Report Due for Friends of Donna Lee Biggs, CC-26-00246

Caution: This Email Originated Outside ELECT. Exercise Caution When Opening Attachments or Clicking Links, Especially From Unknown Senders.

Thanks. You are the first to help with the communication process. You deserve a reward. Let me see if I can help you get it by getting through this process.

I am proud of you.

Donna

On Wednesday, July 15, 2026 at 11:10:46 AM EDT, SBE-CFDA, rr (ELECT)
<campaignfinance@elections.virginia.gov> wrote:

Good morning, Donna

Sir,

I don't understand this information.

1) I opened my checking account with

my own \$200.00. --- That \$200.00 needs to be entered into COMET as a loan or contribution to yourself.

2) No one gave me any money, period. --- You, Donna the regular person, gave Donna the candidate \$200.00

3) I did not make any loan. --- Yes, you did. Or you made a straight contribution to yourself.

4) I withdrew my \$200.00 that I deposited in Towne Bank to get started on my journey to get a seat on Portsmouth City Council. --- Yes, and that's a contribution to a candidate that

triggers the filing of a Statement of Organization. Once a Statement of Organization is created it must be closed with a Final Report once all of the money has been disbursed. [§24.2-947.1](#) and [§24.2-948.4](#)

5) I withdrew from running for the seat because I wasn't part of the group in charge of controlling the city's bank account.

--- Withdrawing from a race does not close out a COMET account. That must be done by the candidate.

6) Portsmouth is the most corrupt city in Virginia. The example that I experienced last night was to be denied the opportunity to speak on a consent agenda. What? I wrote the City Clerk that I wanted to speak and she did not put me on the list to speak. She got by with it. --- This has nothing to do with your campaign finance obligations.

7) Now I am dealing with you on an issue that can be handled in person. --- All campaign finance for candidates is handled electronically through COMET.

Yet, I have to go through hell with y'all because you don't want to help me get through this internet process and not in person. --- You hung up on my staff member who was trying to assist you.

You got it?

I ain't like the people who are running for money, power, and privilege.

Now, How are you going to help me unplug this continuous dialogue? --- You, Donna, are going to end this by filing the report that is due today as a Final Report.

Tammy

Campaign Finance

Virginia Department of Elections
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219

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<https://www.elections.virginia.gov/e-mail-disclaimer/index.html>.

From: Donna <[REDACTED]>

Sent: Wednesday, July 15, 2026 10:07 AM

To: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>

Subject: Re: Notice of Report Due for Friends of Donna Lee Biggs, CC-26-00246

Caution: This Email Originated Outside ELECT. Exercise Caution When Opening Attachments or Clicking Links, Especially From Unknown Senders.

Sir,

I don't understand this information.

- 1) I opened my checking account with my own \$200.00.
- 2) No one gave me any money, period.
- 3) I did not make any loan.
- 4) I withdrew my \$200.00 that I deposited in Towne Bank to get started on my journey to get a seat on Portsmouth City Council.
- 5) I withdrew from running for the seat because I wasn't part of the group in charge of controlling the city's bank account.
- 6) Portsmouth is the most corrupt city in Virginia. The example that I experienced last night was to be denied the opportunity to speak on a consent agenda. What? I wrote the City Clerk that I wanted to speak and she did not put me on the list to speak. She got by with it.
- 7) Now I am dealing with you on an issue that can be handled in person.

Yet, I have to go through hell with y'all because you don't want to help me get through this internet process and not in person.

You got it?

I ain't like the people who are running for money, power, and privilege.

Now, How are you going to help me
unplug this continuous dialogue?
Donna

On Wednesday, July 15, 2026 at 08:49:54 AM EDT, SBE-CFDA, rr (ELECT)
<campaignfinance@elections.virginia.gov> wrote:

Good Morning,

Please see the attached instructions on how to file a final report to close your committee.

Thank you,
Emily Mynarski
Campaign Finance Training and Compliance Specialist
Department of Elections
Emily.Mynarski@elections.virginia.gov

Campaign Finance Filing Resources:

[Virginia Department of Elections Campaign Finance Tutorials - YouTube](#)

[Candidate Campaign Committee Laws Summary](#)

[Campaign Finance Laws and Policies](#)

[COMET Login Portal](#)

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From: SBE - INFO, rr (ELECT) <INFO@elections.virginia.gov>
Sent: Wednesday, July 15, 2026 8:16 AM
To: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>
Subject: FW: Notice of Report Due for Friends of Donna Lee Biggs, CC-26-00246

Stacey Crump
Administrative Assistant
Department of Elections
Stacey.Crump@elections.virginia.gov
804-864-8902

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From: Donna <[REDACTED]>
Sent: Wednesday, July 15, 2026 7:52 AM
To: SBE - INFO, rr (ELECT) <info@elections.virginia.gov>
Subject: Re: Notice of Report Due for Friends of Donna Lee Biggs, CC-26-00246

Caution: This Email Originated Outside ELECT. Exercise Caution When Opening Attachments or Clicking Links, Especially From Unknown Senders.

Sir,
I withdrew from running for
the seat on Portsmouth City Council.
Donna Biggs
[REDACTED] Land Line only

On Wednesday, July 15, 2026 at 06:09:46 AM EDT, <info@elections.virginia.gov> wrote:

[REDACTED]

Please note that your committee has a report due on 7/15/2026 11:59:59 PM for all activity occurring between 4/15/2026 and 6/30/2026.

See "Review and Submit Report" section in the linked document below for instructions.

<https://www.elections.virginia.gov/media/formswarehouse/campaign-finance/comet/COMETQuickGuide.pdf>

Department of Elections

Campaign Finance
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219
800-552-9745
cfda@elections.virginia.gov

From: [Alexander, Tammy \(ELECT\)](#)
To: [Mynarski, Emily \(ELECT\)](#)
Subject: Fw: 2018 Filing Schedule for Friends of Donna Sayegh
Date: Tuesday, August 4, 2026 3:31:35 PM

Donna Biggs from 2018

Tammy L. Alexander

Campaign Finance Compliance and Training Supervisor
Virginia Department of Elections
tammy.alexander@elections.virginia.gov
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219

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From: Donna [REDACTED]
Sent: Monday, July 30, 2018 1:20 PM
To: Alexander, Tammy (ELECT) <Tammy.Alexander@elections.virginia.gov>
Subject: 2018 Filing Schedule for Friends of Donna Sayegh

Thanks, Tammy.

I finally got it.
I see what happened.
Thanks for your patience with me.

I'll check back in September after
Labor Day to make sure that I get
my report in on time.

Hopefully, I'll have more money in
my account by then.

Donna Sayegh
[REDACTED]

-----Original Message-----

From: Tammy Alexander <Tammy.Alexander@elections.virginia.gov>
To: Friends of Donna Sayegh [REDACTED]
Sent: Mon, Jul 30, 2018 1:05 pm
Subject: FW: 2018 Filing Schedule for Friends of Donna Sayegh

----- Original Message -----

From: Elections Campaign Finance Division

Received: 7/6/2018 8:50 AM

To: CC-18-00296-Primary; CC-18-00296-Treasurer; Friends of Donna Sayegh

Subject: 2018 Filing Schedule for Friends of Donna Sayegh

The **2018** filing schedule for **Friends of Donna Sayegh** is listed below.

From	To	Due
01/01/2018	03/31/2018	04/16/2018 11:59 PM
04/01/2018	05/31/2018	06/04/2018 11:59 PM
06/01/2018	06/30/2018	07/16/2018 11:59 PM
07/01/2018	08/31/2018	09/17/2018 11:59 PM
09/01/2018	09/30/2018	10/15/2018 11:59 PM
10/01/2018	10/25/2018	10/29/2018 11:59 PM
10/26/2018	11/29/2018	12/06/2018 11:59 PM
11/30/2018	12/31/2018	01/15/2019 11:59 PM

Department of Elections
 Campaign Finance Section
 1100 Bank Street
 Richmond, VA 23219
 800-552-9745
cfda@elections.virginia.gov

From: [Alexander, Tammy \(ELECT\)](#)
To: [Mynarski, Emily \(ELECT\)](#)
Subject: Fw: Notice of Report Due for Donna Sayegh for Mayor, CC-19-00303
Date: Tuesday, August 4, 2026 3:35:48 PM

Donna Biggs from 2020

Tammy L. Alexander

Campaign Finance Compliance and Training Supervisor
Virginia Department of Elections
tammy.alexander@elections.virginia.gov
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219

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From: [REDACTED]
Sent: Thursday, December 3, 2020 12:38 PM
To: Alexander, Tammy (ELECT) <Tammy.Alexander@elections.virginia.gov>
Subject: Re: Notice of Report Due for Donna Sayegh for Mayor, CC-19-00303

Okay, Thanks, Tammy, for letting me know.

Be Safe.

Donna Sayegh
[REDACTED]

-----Original Message-----

From: Alexander, Tammy <tammy.alexander@elections.virginia.gov>
To: Donna [REDACTED] >
Sent: Thu, Dec 3, 2020 11:46 am
Subject: Re: Notice of Report Due for Donna Sayegh for Mayor, CC-19-00303

Goodmorning, Donna

It looks like you filed your report on time!

Tammy L. Alexander

Campaign Finance Compliance and Training Specialist
Department of Elections
tammy.alexander@elections.virginia.gov
(804) 864-8924

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On Thu, Dec 3, 2020 at 9:49 AM SBE - INFO, rr <info@elections.virginia.gov> wrote:

FYI

Department of Elections
1100 Bank Street, 1st Floor
Richmond, Virginia 23219
804 864-8901
804 552-9745

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----- Forwarded message -----

From: [REDACTED]
Date: Thu, Dec 3, 2020 at 7:21 AM
Subject: Re: Notice of Report Due for Donna Sayegh for Mayor, CC-19-00303
To: Info@elections.virginia.gov <Info@elections.virginia.gov>

Dear Tammy,

I called and left you a message a couple of days ago.

I was wondering if I had filed 2 reports.

Thanks for any information.

Donna Sayegh
[REDACTED]

-----Original Message-----

From: Info@elections.virginia.gov
To: [REDACTED]
Sent: Thu, Dec 3, 2020 6:03 am
Subject: Notice of Report Due for Donna Sayegh for Mayor, CC-19-00303

Virginia Department of Elections Logo



Please note that your committee has a report due on 12/3/2020 11:59:59 PM for all activity occurring between 10/23/2020 and 11/26/2020.

See "Review and Submit Report" section in the linked document below for instructions.

<https://www.elections.virginia.gov/media/formswarehouse/campaign-finance/comet/COMETQuickGuide.pdf>

Department of Elections
Campaign Finance
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219
800-552-9745
cfda@elections.virginia.gov

FRIENDS OF SABRINA (CC-26-00014)

BASIS FOR APPEAL:

Filing Report/Requesting Extension Impracticable by Deadline; An Administrative Error

GROUND(S) FOR RELIEF:

Candidate was late filing the report due to preparing the report minutes prior to the deadline. The candidate serves as their own treasurer and did not know that they had to enter in certain transactions, which contributed to their late filing.

REPORT(S) APPEALED:

7/15/2026

- Penalty Assessed (\$100) 7/22/2026 by Fairfax County General Registrar
(Eric Spicer)

RELIEF REQUESTED:

Forgiveness of Assessed Penalty (\$100)

LATE FILING HISTORY:

No Prior Late Filings on Record

AGGRAVATING FACTOR(S):

Committee had 15 days to file the report. Candidate received 2 email reminders for the deadline. Candidate did not login to COMET until the evening of the deadline.

SUGGESTED MOTIONS:

GRANT, AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$100 assessed penalty.*)"

GRANT, NOT AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(state relief to be granted if different than requested)."

DISMISS PETITION: "Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner's appeal of the assessed campaign finance penalty(s) for failure to show good cause."

ELECT COMMENT(S):

Candidate did not attempt to Login to COMET until 9:31PM on the night of the deadline. Candidate had 15 days to file the required report and waiting until the last few hours of the deadline may lead to late filings.

Candidate never contacted ELECT for any assistance prior to the deadline.

GENERAL REGISTRAR COMMENT(S):

General Registrar provided calculations for assessed penalty.
- See Petitioner's Provided Invoice

**APPEAL PETITION
AND PETITIONER
SUPPLIED DOCUMENTS**

Penalty Appeal for Committee: Friends of Sabrina - CC-26-00014

[Print](#)

Petitioner Information

Email Address: [REDACTED]**First Name:** Sabrina**Middle Name:****Last Name:** Bruce**Role in Committee:** Candidate**Address Line 1:** 859 Dogwood Ct**Address Line 2:****Suite:****City:** Herndon **State:** VA **Zip:** 20170**Phone Number:** [REDACTED]**Are you appealing a penalty issued to a Committee or Individual?** Committee

Penalized Committee Information

Committee Name: Friends of Sabrina**Committee Code:** CC-26-00014**Address Line 1:** 859 Dogwood Ct**Address Line 2:****Suite:****City:** Herndon **State:** VA **Zip:** 20170

Report Information

Filing Period Start: 4/1/2026 12:00:00 AM**Filing Period End:** 6/30/2026 12:00:00 AM**Filing Deadline for Report:** 7/15/2026 12:00:00 AM**Date Report was Submitted:** 7/16/2026 12:00:00 AM

Penalty Information

Issuing Entity: Virginia Dept. of Elections**Invoice Number:****Date of Penalty:** 7/22/2026 12:00:00 AM**Amount of Penalty:** \$100.00**Date of Receipt of Penalty Notice:** 7/23/2026 12:00:00 AM

Appeal Information

Reason for Appeal:

- Circumstances made filing the required report or requesting an extension by the deadline impracticable.
- There was an administrative error in the assessment of the penalty.

Grounds for Appeal: I am a first time candidate and trying to understand the system. All my filings are being done myself. In my filing on June 15th, I was informed late at night that I needed to make sure my ActBlue service fees were included as expenses. Putting in these expenses delayed my completion of my report. Even with that, my report was completed roughly around 1158pm. I submitted the report and as COMET was processing my request, the clock rolled over to midnight. My report was submitted seconds after passing the deadline. I have attached an image that shows my report was accepted at midnight. I accept the responsibility of ensuring that these reports are done in a timely manner. I will ensure that in the future that circumstances do not put me in a situation where I am so close to the deadline.

Relief Sought: I am requesting forgiveness of the penalty that was assessed towards me.

File Uploads:

File Type	File
Penalty Notice	img07222026_0001.pdf
Attachment Evidence	Screenshot 20260728 135038.jpg

Emails

View Email	Subject	When	Who	Email Sent
View Email	Your Penalty Appeal form has been Received	07/28/2026 1:53 PM	sabrina@sabrin...	Sent

Notes

Attachments



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods, and diverse communities of Fairfax County

Electoral Board

Hon. Katherine K. Hanley
Chairman

Megan M. Challenger
Vice Chairman

Kevin R. Pinkney
Secretary

Eric L. Spicer
General Registrar and
Director of Elections

July 22, 2026

Via email: sabrina@sabrinabruce.com

Friends of Sabrina
Sabrina A. Bruce
859 Dogwood Ct
Herndon, VA 20170-5446

Dear Sabrina Bruce,

After careful review, our records show that Friends of Sabrina (CC-26-00014) did not file its Campaign Finance reports by the July 15, 2026 deadline.

According to the civil penalty schedule adopted by the State Board of Elections, the committee must be assessed a penalty of \$100 for the first report not submitted by the deadline. Any additional late reports during this election cycle will result in a \$1,000 fine.

Filing Period: 4/1/2026 – 6/30/2026

Report Deadline: July 15, 2026

Date Filed: July 16, 2026

Penalty Amount Due: \$100.00

Penalty Amount Due by: September 21, 2026

Please make your check in the amount of \$100.00 payable to "County of Fairfax, VA." Please forward your payment within 60 days from the date of this notice (September 21, 2026) to the Fairfax County Office of Elections, Office of the General Registrar, a return envelope is enclosed. If we do not receive payment by the deadline above, we are required to refer this matter to the Fairfax County Commonwealth's Attorney, pursuant to Code of Virginia § 24.2-946.3.

Pursuant to Va. Code § 24.2-953.6(A), if circumstances made it impracticable to file or request an extension by the deadline or the penalty was wrongfully assessed due to an administrative error, you may file an appeal to the State Board within 60 days of receipt of the penalty at <https://cfapps.elections.virginia.gov/Appeal>. Pursuant to Va. Code § 24.2-953.6(C), the State Board may, in its discretion, grant relief for good cause shown. For questions related to the appeal process, please contact CFAppeals@elections.virginia.gov.

If you feel that you require additional information or have received this letter in error, please contact our office as soon as possible at 703-222-0776.

Sincerely,

Eric Spicer
General Registrar/Director of Elections

Voter Services
Phone: 703-222-0776
Fax: 703-324-2205
TTY: 711 (Virginia Relay)
Email: voting@fairfaxcounty.gov

Election Administration
Phone: 703-324-4735
Fax: 703-324-4706
TTY: 711 (Virginia Relay)
Email: elect@fairfaxcounty.gov

Fairfax County Office of Elections
12000 Government Center Parkway
Suite 323
Fairfax, Virginia 22035
www.fairfaxcounty.gov/elections

Department of Elections Committee ID and Name:

CC-26-00014, Friends of Sabrina

Date Received:

07/16/2026 12:00 AM

Reporting Period:

Start Date: 04/01/2026 End Date: 06/30/2026 Report Due Date: 7/15/2026 11:59:59 PM

Scheduled Filing:

Amendment Count: 0

Final Report: No

ELECT
SUPPORTING
DOCUMENT(S)

Friends of Sabrina - User Login Activity

COMET User Activity - Login Information

Show entries

Search:

User Name	Time Accessed	Details
	1/7/2026 2:16:22 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	2/9/2026 12:09:57 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	2/9/2026 2:00:02 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	2/13/2026 3:17:09 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/15/2026 8:38:35 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/23/2026 12:47:26 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/24/2026 1:30:31 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/24/2026 2:02:07 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/24/2026 3:38:19 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/15/2026 9:31:50 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/27/2026 11:25:52 PM	{ "Information": [{ "ResourceInfo": "Login Failure", "ControllerAction": "A..."
	7/27/2026 11:26:07 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."

Showing 1 to 12 of 12 entries (filtered from 61,921 total entries)

< 1 >

Friends of Sabrina – Email Reminders Sent Prior to Deadline

Reporting Period for Friends of Sabrina - CC-26-00014

X

Report Type: Scheduled
 Filing Status: Late ⚠️
 Begin Date: 04/01/2026
 End Date: 06/30/2026
 Due Date: 07/15/2026 11:59 PM
 Date Filed: 07/16/2026 12:00 AM

Submitted On	Submitted By	Is Amendment?	Final Report
7/16/2026 12:00:06 AM			No View Report

Emails				
View Email	Subject	When	Who	Email Sent
View Email	07/15/2026 Report Received	07/16/2026 12:00 AM	Bruce, Sabrina	Sent
View Email	Report Filed by Friends of Sabrina, CC-26-0...	07/16/2026 12:00 AM	Bruce, Sabrina	Sent
Emails				
View Email	Subject	When	Who	Email Sent
View Email	Notice of Report Due for Friends of Sabri...	07/09/2026 6:18 AM	Agent, SQL Exec...	Sent
View Email	Notice of Report Due for Friends of Sabri...	07/15/2026 6:09 AM	Agent, SQL Exec...	Sent
Notes				
Attachments				

FRIENDS OF CLARK HEDRICK (CC-20-00309)

BASIS FOR APPEAL:

Filing Report/Requesting Extension Impracticable by Deadline

GROUND(S) FOR RELIEF:

Candidate did not see the notifications that the filing deadline changed and did not check their emails to see the notifications, due to professional obligations.

REPORT(S) APPEALED:

7/27/2026

- Penalty Assessed (\$100) 7/29/2026 by Fairfax County General Registrar (Eric Spicer)

RELIEF REQUESTED:

Forgiveness of Assessed Penalty (\$100)

LATE FILING HISTORY:

12/3/2020

1/15/2021

AGGRAVATING FACTOR(S):

Committee had 4 days to file the report. Candidate received 4 email reminders for the deadline. Candidate was emailed multiple times about the change of schedule for the 2026 reporting schedule. Candidate did not login to COMET during the filing period.

SUGGESTED MOTIONS:

GRANT, AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$100 assessed penalty*)."

GRANT, NOT AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(state relief to be granted if different than requested)."

DISMISS PETITION: "Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner's appeal of the assessed campaign finance penalty(s) for failure to show good cause."

ELECT COMMENT(S):

Candidate did not login during the filing period. ELECT sent multiple emails notifying candidates of the filing changes. ELECT also sent 2 emails reminding candidates of the July 27th deadline.

- See ELECT Supporting Document(s)

GENERAL REGISTRAR COMMENT(S):

General Registrar provided calculations for assessed penalty.

- See Petitioner's Provided Invoice
- General Registrar sent the candidate an email reminder prior to the deadline.
- See petition

APPEAL PETITION
AND PETITIONER
SUPPLIED DOCUMENTS

Penalty Appeal for Committee: Friends of Clark Hedrick - CC-20-00309

[Print](#)

Petitioner Information

Email Address: [REDACTED]

First Name: Clark

Middle Name:

Last Name: Hedrick

Role in Committee: Candidate

Address Line 1: 828 Van Buren St.

Address Line 2:

Suite:

City: Herndon State: VA Zip: 20170

Phone Number: [REDACTED]

Are you appealing a penalty issued to a Committee or Individual? Committee

Penalized Committee Information

Committee Name: Friends of Clark Hedrick

Committee Code: CC-20-00309

Address Line 1: 828 Van Buren St.

Address Line 2:

Suite:

City: Herndon State: VA Zip: 20170

Report Information

Filing Period Start: 7/1/2026 12:00:00 AM

Filing Period End: 7/23/2026 12:00:00 AM

Filing Deadline for Report: 7/27/2026 12:00:00 AM

Date Report was Submitted: 7/29/2026 12:00:00 AM

Penalty Information

Issuing Entity: General Registrar

Invoice Number:

Date of Penalty: 7/29/2026 12:00:00 AM

Amount of Penalty: \$100.00

Date of Receipt of Penalty Notice: 7/29/2026 12:00:00 AM

Appeal Information

Reason for Appeal:

- Circumstances made filing the required report or requesting an extension by the deadline impracticable.

Grounds for Appeal: The filing deadline was imposed mid-cycle, in February, and has not matched any prior filing schedule. In an abundance of due diligence, as I do every year, I placed the filing schedule on my calendar as a reminder in January. I had no reason to believe the schedule would change and did not check. The local registrar did send an email notice on 7/15, however due to professional obligations, I did not see or access that notice. Furthermore, for this period, I had no activity during the period.

Relief Sought: Forgiveness of penalty and retroactive extension of the deadline.

File Uploads:

File Type	File
Penalty Notice	img07292026_0001.pdf

Emails				
View Email	Subject	When	Who	Email Sent
View Email	Your Penalty Appeal form has been Received	07/30/2026 11:18 AM	clark.a.hedrick1...	Sent
Notes				
Attachments				



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods, and diverse communities of Fairfax County

Electoral Board

Hon. Katherine K. Hanley
Chairman

Megan M. Challender
Vice Chairman

Kevin R. Pinkney
Secretary

Eric L. Spicer
General Registrar and
Director of Elections

July 29, 2026

Via email: clark.a.hedrick1@gmail.com

Friends of Clark Hedrick
Clark A. Hedrick
828 Van Buren St
Herndon, VA 20170-4651

Dear Clark Hedrick,

After careful review, our records show that Friends of Clark Hedrick (CC-20-00309) did not file its Campaign Finance reports by the July 27, 2026 deadline.

According to the civil penalty schedule adopted by the State Board of Elections, the committee must be assessed a penalty of \$100 for the first report not submitted by the deadline. Any additional late reports during this election cycle will result in a \$1,000 fine.

Filing Period: July 1, 2026 – July 23, 2026

Report Deadline: July 27, 2026

Date Filed: Not filed

Penalty Amount Due: \$100.00

Penalty Amount Due by: September 28, 2026

Please make your check in the amount of \$100.00 payable to "County of Fairfax, VA." Please forward your payment within 60 days from the date of this notice (September 28, 2026) to the Fairfax County Office of Elections, Office of the General Registrar, a return envelope is enclosed. If we do not receive payment by the deadline above, we are required to refer this matter to the Fairfax County Commonwealth's Attorney, pursuant to Code of Virginia § 24.2-946.3.

Pursuant to Va. Code § 24.2-953.6(A), if circumstances made it impracticable to file or request an extension by the deadline or the penalty was wrongfully assessed due to an administrative error, you may file an appeal to the State Board within 60 days of receipt of the penalty at <https://cfapps.elections.virginia.gov/Appeal>. Pursuant to Va. Code § 24.2-953.6(C), the State Board may, in its discretion, grant relief for good cause shown. For questions related to the appeal process, please contact CFAppeals@elections.virginia.gov.

If you feel that you require additional information or have received this letter in error, please contact our office as soon as possible at 703-222-0776.

Sincerely,

Eric Spicer
General Registrar/Director of Elections

Voter Services
Phone: 703-222-0776

Fax: 703-324-2205

TTY: 711 (Virginia Relay)

Email: voting@fairfaxcounty.gov

Election Administration

Phone: 703-324-4735

Fax: 703-324-4706

TTY: 711 (Virginia Relay)

Email: elect@fairfaxcounty.gov

Fairfax County Office of Elections

12000 Government Center Parkway

Suite 323

Fairfax, Virginia 22035

www.fairfaxcounty.gov/elections

ELECT
SUPPORTING
DOCUMENT(S)

LOGIN ACTIVITY FOR FRIENDS OF CLARK HEDRICK

COMET User Activity - Login Information

Show 10 entries

Search:

User Name	Time Accessed	Details
	1/2/2026 9:03:29 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	3/5/2026 10:04:53 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/2/2026 6:04:10 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/12/2026 11:50:29 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/29/2026 5:35:02 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."

Showing 1 to 5 of 5 entries (filtered from 62,354 total entries)

< 1 >

EMAIL REMINDERS:

Reporting Period for Friends of Clark Hedrick - CC-20-00309

X

Report Type: Scheduled
 Filing Status: Late ⚠️
 Begin Date: 07/01/2026
 End Date: 07/23/2026
 Due Date: 07/27/2026 11:59 PM
 Date Filed: 07/29/2026 5:35 PM

Submitted On	Submitted By	Is Amendment?	Final Report
7/29/2026 5:35:42 PM		No	View Report

Emails				
View Email	Subject	When	Who	Email Sent
View Email	07/27/2026 Report Received	07/29/2026 5:36 PM	Hedrick, Clark	Sent
View Email	Report Filed by Friends of Clark Hedrick, CC...	07/29/2026 5:36 PM	Hedrick, Clark	Sent
Emails				
View Email	Subject	When	Who	Email Sent
View Email	Notice of Report Due for Friends of Clark...	07/19/2026 6:02 AM	Agent, SQL Exec...	Sent
View Email	Notice of Report Due for Friends of Clark...	07/26/2026 6:02 AM	Agent, SQL Exec...	Sent

Friends of Clark Hedrick - CC-20-00309

X

Contacts

Committee Friends of Clark Hedrick

Subject: Updates in Campaign Finance

Email Content:



• VIRGINIA •
DEPARTMENT of ELECTIONS

July 1, 2026, marked the start of §24.2-948.6 pertaining to the use of campaign funds. The Candidate Campaign Committee Summary of Laws and Policies has been updated to reflect this new information for candidate committees. You can find the Candidate Campaign Committee Summary of Laws and Policies on this page of our website.

<https://www.elections.virginia.gov/candidatepac-info/regulation-and-policies/>

For candidate committees with elections on the 2026 November ballot, please, remember that today is the start of the filing period for the July 27, 2026, deadline. File today, so you can enjoy your weekend!

Today also marks the start of the first large pre-election contribution reporting (LCR) period for offices on the 2026 November ballot. The local threshold is \$500. Any contribution received in the amount of \$500 or more must be reported by the next day except for contributions received the day before the primary date or the November election date which must be filed the same day.

This year's two LCR periods are

July 24 through August 3
and
October 23 through November 2

All candidate committees are required to keep all their financial records pursuant to §24.2-947.3.

This year's Campaign Finance Reports and Records Review drawing will take place after the January 15, 2027 deadline which closes out the election cycle for those offices on the 2026 November General Election ballot. The date and time of the drawing will be announced later this year. You will be contacted via the email contact information you provide(d) on your Statement of Organization in the event you are chosen in the random drawing. Keep tidy records to make this process easy.

Remember that if you have any questions regarding campaign finance, we welcome your emails at CFDA@elections.virginia.gov

Contact the Department of Elections if you have any questions.

Department of Elections
Campaign Finance
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219
800-552-9745

Friends of Clark Hedrick - CC-20-00309

X

Contacts

Committee

Friends of Clark Hedrick

Subject: Amended 2026 Filing Schedule

Email Content:



Good afternoon,

The 2026 Primary date has been moved to August 4, 2026. This change requires a change to the annual filing schedule for committees with Statements of Organization for offices on the 2026 ballot. Reports are due regardless of whether the candidate has achieved ballot access or not.

Please, log into COMET to view the new schedule under the Yellow Reporting Button or the Red Reporting Tab.

You can also print out a paper version of the filing schedule from this link on our website.
<https://www.elections.virginia.gov/media/formswarehouse/campaign-finance/2026/AMENDED-2026-Candidate-Reporting-Deadlines-example.pdf>

Please, enter these dates on your calendars and in your phone notifications.

You can file your report as soon as the activity end date passes.

For example:

You can file as early as April 1st for the report that's due April 15th

You can file July 1st for the report due July 15th

You can file July 24th for the report due July 27th, etc.

Don't wait until the last day!

Also make note of the two large pre-election contributions filing periods. These are the 11 days prior to August 4th and the 11 days prior to November 3rd.

July 24th – August 3rd, 2026

October 23rd – November 2nd, 2026

Please, make yourself familiar with the Summary of Laws and Policies found on this page of our website.
<https://www.elections.virginia.gov/candidatepac-info/regulation-and-policies/>

COMET Tutorial videos on our Campaign Finance Playlist can be found on our YouTube channel at
<https://www.youtube.com/@SBEvirginia/playlists>

If you have a problem filing a report or any other campaign finance related questions, please, email us at CFDA@elections.virginia.gov as soon as possible for assistance.

Contact the Department of Elections if you have any questions.

Department of Elections
 Campaign Finance
 Washington Building, First Floor
 1100 Bank Street
 Richmond, VA 23219
 800-552-9745

Email History 				
View Email	Subject	When	Who	Email Sent
View Email	Updates in Campaign Finance	07/24/2026 12:14 PM	Alexander, Tammy	Sent
View Email	Updates in Campaign Finance	07/24/2026 12:14 PM	Alexander, Tammy	Sent
View Email	Updates in Campaign Finance	07/24/2026 12:14 PM	Alexander, Tammy	Sent
View Email	Updates in Campaign Finance	07/24/2026 12:14 PM	Alexander, Tammy	Sent
View Email	Amended 2026 Filing Schedule	03/24/2026 11:37 AM	Alexander, Tammy	Sent
View Email	Amended 2026 Filing Schedule	03/24/2026 11:37 AM	Alexander, Tammy	Sent
View Email	Amended 2026 Filing Schedule	03/24/2026 11:37 AM	Alexander, Tammy	Sent
View Email	Amended 2026 Filing Schedule	03/24/2026 11:37 AM	Alexander, Tammy	Sent

KAT'S LEADERSHIP COMMITTEE (CC-26-00220)

BASIS FOR APPEAL:

Filing Report/Requesting Extension Impracticable by Deadline; An Administrative Error

GROUND(S) FOR RELIEF:

Candidate filed an amendment to a previous report unintentionally, believing it to be the required report, which was due.

REPORT(S) APPEALED:

7/27/2026

- Penalty Assessed (\$100) 7/29/2026 by Harrisonburg City General Registrar (Mark Finks)

RELIEF REQUESTED:

Forgiveness of Assessed Penalty (\$100)

LATE FILING HISTORY:

No Prior Late Filings on Record

AGGRAVATING FACTOR(S):

Committee had 4 days to file the report. Candidate received 4 email reminders for the deadline. Candidate did not login to COMET until the evening of the deadline.

SUGGESTED MOTIONS:

GRANT, AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*Petitioner is requesting forgiveness for the \$100 assessed penalty.*)"

GRANT, NOT AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(state relief to be granted if different than requested)."

DISMISS PETITION: "Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner's appeal of the assessed campaign finance penalty(s) for failure to show good cause."

ELECT COMMENT(S):

The report in the provided screenshots indicates which report was filed, and that it was amendment to a previous report filing.

Candidate did not attempt to Login to COMET until 11:25 PM on the night of the deadline. Candidates had 4 days to file the required report and waiting until the last few hours of the deadline may lead to late filings.

GENERAL REGISTRAR COMMENT(S):

General Registrar provided calculations for assessed penalty.

- See Petitioner's Provided Invoice

General Registrar sent the candidate an email reminder prior to the deadline.

- See General Registrar Document(s)

APPEAL PETITION
AND PETITIONER
SUPPLIED DOCUMENTS

Penalty Appeal for Individual: Kat Leadership Committee

[Print](#)

Petitioner Information

Email Address: [REDACTED]**First Name:** Kathy**Middle Name:** Meredith**Last Name:** Hendley**Role in Committee:** Candidate**Address Line 1:** 600 Norwood Street**Address Line 2:** Apt G**Suite:****City:** Harrisonburg **State:** VA **Zip:** 22801**Phone Number:** [REDACTED]**Are you appealing a penalty issued to a Committee or Individual?** Individual

Penalized Individual Information

Full Name: Kat Leadership Committee**Relationship:** Self**Address Line 1:** 600 Norwood Street**Address Line 2:** Apt G**Suite:****City:** Harrisonburg **State:** VA **Zip:** 22801**Phone Number:** [REDACTED]**Email Address:** [REDACTED]

Report Information

Filing Period Start: 7/1/2026 12:00:00 AM**Filing Period End:** 7/23/2026 12:00:00 AM**Filing Deadline for Report:** 7/27/2026 12:00:00 AM**Date Report was Submitted:** 7/28/2026 12:00:00 AM

Penalty Information

Issuing Entity: General Registrar**Invoice Number:** LF010**Date of Penalty:** 7/29/2026 12:00:00 AM**Amount of Penalty:** \$100.00**Date of Receipt of Penalty Notice:** 7/28/2026 12:00:00 AM

Reason for Appeal:

- Circumstances made filing the required report or requesting an extension by the deadline impracticable.
- There was an administrative error in the assessment of the penalty.

Grounds for Appeal: On the application online , it statement that the report was filed. When checked the o report said it was an amended report.

Relief Sought: The relief is due to the online reporting and the incorrect information reported from the online website.

File Uploads:

File Type	File
Penalty Notice	IMG_8043.png
Attachment Evidence	IMG_8043.png
Attachment Evidence	IMG_8042.png
Attachment Evidence	IMG_8035.jpeg

Notes

Attachments

07/27/2026 Report Received



info@elections.virginia... Jul 28 ★
To: Me ▾



★ VIRGINIA ★
DEPARTMENT of ELECTIONS

From: ELECT Campaign Finance Division
Received: 07/28/2026 11:16 PM
To: Kat's Leadership Committee , Kathy Hendley
Subject: 07/27/2026 Report Received

Department of Elections Committee ID and Name:

CC-26-00220, Kat's Leadership Committee

Date Received:
07/28/2026 11:16 PM

Reporting Period:
Start Date: 07/01/2026 End Date: 07/23/2026
Report Due Date: 7/27/2026 11:59:59 PM

Scheduled Filing:
Amendment Count: 0

Final Report: No

The Department of Elections (ELECT) has received your campaign Finance Disclosure Report. While your report has been received, it has not been fully processed. ELECT will review your report and alert you if we find any errors. ELECT ~~highly recommends~~ that you



Delete

Reply

Forward

Move

More



cf.elections.virginia.gov

★ VIRGINIA ★
DEPARTMENT of ELECTIONSWelcome Kathy Hendley!
[Log Off](#) | [Change Password](#) | [Profile](#)[Home](#)[About](#)[FAQs](#)[Statement of Organization](#) | [Users](#) | [Contacts](#) | [Expenditures](#) | [Loans / Debts](#) | [Receipts](#) | [Reporting](#)

Review & Submit Report for Kat's Leadership Committee (CC-26-00220)

[Report](#) [A](#) [B](#) [C](#) [D](#) [E-1](#) [E-2](#) [F](#) [G](#) [H](#)

This Report Has Been Submitted

1. [Select Reporting Period](#)
2. [Prepare Report for Review](#)
3. **Review Prepared Report and Submit**

This report has been submitted. If you wish to file changes return to the [Prepare Report for Review](#) page and create an amendment.

Report for 07/01/2026 - 07/23/2026

- Amended filing
- Final Report

AmendmentCount:

0

Schedule A and B Contact Statistics

	Schedule A	Schedule B	Both
Entries	0	0	0
Complete Entries	0	0	0
Completion Rate	% 100.00	% 100.00	% 100

Report Submitted

Submitted On: 07/28/2026 By: Kathy Hendley

216

GENERAL REGISTRAR
SUPPORTING
DOCUMENT(S)

From: [Mark D. Finks](#)
Bcc: "katleadershipcommittee@gmail.com"; "kathen129@yahoo.com"; [REDACTED]
Subject: Campaign Finance Deadline Monday Night (July 27th)
Date: Sunday, July 26, 2026 5:19:00 PM
Attachments: [image002.png](#)
Importance: High

Hello Everyone,

This is a reminder that Monday night is a campaign finance deadline. I'm contacting you because as of the time of this email I have not received confirmation from COMET that your campaign has filed a report for this period.

If you are unable to file your report in COMET by Monday's deadline your campaign committee will be subject to fines listed under state code [§ 24.2-953.2](#). You still must submit a report even if you didn't have any activity during this time period.

-

My office will not always be able to send this reminder email, so please remember to review the 2026 amended deadlines. <https://www.elections.virginia.gov/media/formswarehouse/campaign-finance/2026/AMENDED-2026-Candidate-Reporting-Deadlines-example.pdf>

Take care,

Mark Finks

Director of Elections / General Registrar
City of Harrisonburg
409 South Main Street
Harrisonburg, VA 22801
P: 540-432-7707 // C: 540-435-8992 // F: 540-432-7784



CITY OF HARRISONBURG
VOTER
REGISTRAR

**CHECK YOUR
VOTER STATUS**

From: [Mark D. Finks](#)
To: kathen129@yahoo.com; "katleadershipcommittee@gmail.com"
Subject: Late Filing Notification
Date: Wednesday, July 29, 2026 8:55:00 AM
Attachments: [image002.png](#)

Dear Kathy,

A careful review of our records shows that Kat's Leadership Committee filed its report on August 28th which was after the report's required deadline of August 27th.

According to the civil penalty schedule adopted by the State Board of Elections, the committee must be assessed a penalty of \$100 for not submitting the required campaign finance report by the deadline. **Any additional late reports during this election cycle will result in a \$1,000 fine.**

The failure to pay the civil penalty within 60 days (September 26th, 2026) of the deadline for this filing period will result in the Harrisonburg General Registrar requesting the Commonwealth's attorney to enforce collection.

Filing Period Ending	Report Deadline	Date Filled	Assessed Penalty
07/23/26	07/27/26	07/28/26	\$100
TOTAL AMOUNT DUE Invoice Number (LF0101)			\$100

Please make your check in the amount of \$100 payable to the Treasurer of the City of Harrisonburg referencing the invoice number listed above and forward this payment to the General Registrar.

Pursuant to Va. Code § 24.2-953.6(A), if circumstances made it impracticable to file or request an extension by the deadline or the penalty was wrongfully assessed due to an administrative error, you may file an appeal to the State Board within 60 days of receipt of the penalty at <https://cfapps.elections.virginia.gov/Appeal>. Pursuant to Va. Code § 24.2-953.6(C), the State Board may, in its discretion, grant relief for good cause shown. For questions related to the appeal process, please contact CFAppeals@elections.virginia.gov.

If you feel that you require additional information or have received this letter in error, please contact our office as soon as possible at 540-432-7707.

Sincerely,

Mark Finks

Director of Elections / General Registrar
 City of Harrisonburg
 409 South Main Street

Harrisonburg, VA 22801

P: 540-432-7707 // C: 540-435-8992 // F: 540-432-7784



CITY OF HARRISONBURG
VOTER
REGISTRAR

**CHECK YOUR
VOTER STATUS**

From: [Mark D. Finks](#)
To: ["katleadershipcommittee@gmail.com"](#); [kathen129@yahoo.com](#)
Subject: RE: Late Filing Notification
Date: Wednesday, July 29, 2026 4:16:00 PM
Attachments: [image002.png](#)

Hello Kathy,

Unfortunately, notification of a missed deadline to ELECT does not void any penalties. Please review the letter for the option to appeal the penalty if you qualify for relief. You can appeal at <https://cfapps.elections.virginia.gov/Appeal>

Regards,

Mark Finks

Director of Elections / General Registrar
City of Harrisonburg
409 South Main Street
Harrisonburg, VA 22801
P: 540-432-7707 // C: 540-435-8992 // F: 540-432-7784



From: katleadershipcommittee@gmail.com <katleadershipcommittee@gmail.com>
Sent: Wednesday, July 29, 2026 3:24 PM
To: Mark D. Finks <Mark.Finks@harrisonburgva.gov>; kathen129@yahoo.com
Subject: Re: Late Filing Notification

WARNING: External email. Be cautious when clicking on links or opening attachments.

Good afternoon. I already reached out to finance committee about the online issue.

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, July 29, 2026, 8:55 AM, Mark D. Finks <Mark.Finks@harrisonburgva.gov> wrote:

Dear Kathy,

A careful review of our records shows that Kat's Leadership Committee filed its report on August 28th which was after the report's required deadline of August 27th.

According to the civil penalty schedule adopted by the State Board of Elections, the committee must be assessed a penalty of \$100 for not submitting the required campaign finance report by the deadline. **Any additional late reports during this election cycle will result in a \$1,000 fine.**

The failure to pay the civil penalty within 60 days (September 26th, 2026) of the deadline for this filing period will result in the Harrisonburg General Registrar requesting the Commonwealth's attorney to enforce collection.

Filing Period Ending	Report Deadline	Date Filled	Assessed Penalty
07/23/26	07/27/26	07/28/26	\$100
TOTAL AMOUNT DUE Invoice Number (LF0101)			\$100

Please make your check in the amount of \$100 payable to the Treasurer of the City of Harrisonburg referencing the invoice number listed above and forward this payment to the General Registrar.

Pursuant to Va. Code § 24.2-953.6(A), if circumstances made it impracticable to file or request an extension by the deadline or the penalty was wrongfully assessed due to an administrative error, you may file an appeal to the State Board within 60 days of receipt of the penalty at <https://cfapps.elections.virginia.gov/Appeal>. Pursuant to Va. Code § 24.2-953.6(C), the State Board may, in its discretion, grant relief for good cause shown. For questions related to the appeal process, please contact CFAppeals@elections.virginia.gov.

If you feel that you require additional information or have received this letter in error,

please contact our office as soon as possible at 540-432-7707.

Sincerely,

Mark Finks

Director of Elections / General Registrar

City of Harrisonburg

409 South Main Street

Harrisonburg, VA 22801

P: 540-432-7707 // C: 540-435-8992 // F: 540-432-7784



CITY OF HARRISONBURG
VOTER
REGISTRAR

**CHECK YOUR
VOTER STATUS**

ELECT
SUPPORTING
DOCUMENT(S)

Kat’s Leadership Committee – User Login Activity

COMET User Activity - Login Information		
Show 25 entries		Search:
User Name	Time Accessed	Details
	4/8/2026 9:14:03 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/8/2026 9:40:27 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/9/2026 1:55:40 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/9/2026 5:08:41 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/9/2026 6:41:52 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/10/2026 10:21:30 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/10/2026 5:37:33 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/13/2026 9:49:10 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/14/2026 10:55:58 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/15/2026 7:30:07 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	4/20/2026 4:45:10 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/15/2026 9:31:00 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/15/2026 9:53:40 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/27/2026 10:49:38 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/28/2026 12:46:17 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/28/2026 11:06:53 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
Showing 1 to 16 of 16 entries (filtered from 61,943 total entries)		< 1 >

Kat's Leadership Committee – Email Reminders Sent Prior to Deadline

Reporting Period for Kat's Leadership Committee - CC-26-00220

X

Report Type: Scheduled
 Filing Status: Late ⚠️
 Begin Date: 07/01/2026
 End Date: 07/23/2026
 Due Date: 07/27/2026 11:59 PM
 Date Filed: 07/28/2026 11:16 PM

Submitted On	Submitted By	Is Amendment?	Final Report
7/28/2026 11:16:34 PM			No View Report

Emails

View Email	Subject	When	Who	Email Sent
View Email	07/27/2026 Report Received	07/28/2026 11:17 PM	Hendley, Kathy	Sent
View Email	Report Filed by Kat's Leadership Committe...	07/28/2026 11:17 PM	Hendley, Kathy	Sent

Emails

View Email	Subject	When	Who	Email Sent
View Email	Notice of Report Due for Kat's Leadershi...	07/19/2026 6:13 AM	Agent, SQL Exec...	Sent
View Email	Notice of Report Due for Kat's Leadershi...	07/26/2026 6:09 AM	Agent, SQL Exec...	Sent

Notes

Attachments

Kat's Leadership Committee - CC-26-00220

X

Contacts

Committee	Kat's Leadership Committee	
Treasurer	Kathy Hendley	

Subject: Updates in Campaign Finance

Email Content:



* VIRGINIA *

DEPARTMENT of ELECTIONS

July 1, 2026, marked the start of §24.2-948.6 pertaining to the use of campaign funds. The Candidate Campaign Committee Summary of Laws and Policies has been updated to reflect this new information for candidate committees. You can find the Candidate Campaign Committee Summary of Laws and Policies on this page of our website.

<https://www.elections.virginia.gov/candidatepac-info/regulation-and-policies/>

For candidate committees with elections on the 2026 November ballot, please, remember that today is the start of the filing period for the July 27, 2026, deadline. File today, so you can enjoy your weekend!

Today also marks the start of the first large pre-election contribution reporting (LCR) period for offices on the 2026 November ballot. The local threshold is \$500. Any contribution received in the amount of \$500 or more must be reported by the next day except for contributions received the day before the primary date or the November election date which must be filed the same day.

This year's two LCR periods are

July 24 through August 3
and
October 23 through November 2

All candidate committees are required to keep all their financial records pursuant to §24.2-947.3.

This year's Campaign Finance Reports and Records Review drawing will take place after the January 15, 2027 deadline which closes out the election cycle for those offices on the 2026 November General Election ballot. The date and time of the drawing will be announced later this year. You will be contacted via the email contact information you provide(d) on your Statement of Organization in the event you are chosen in the random drawing. Keep tidy records to make this process easy.

Remember that if you have any questions regarding campaign finance, we welcome your emails at CFDA@elections.virginia.gov

Contact the Department of Elections if you have any questions.

Department of Elections
Campaign Finance
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219
800-552-9745

Sent: 7/24/2026 12:45:00 PM

Sent By: Entered by: [Alexander, Tammy](#)
Sent From: cfda@elections.virginia.gov

FIGHT FOR FAIRFAX (PAC-22-00038)

BASIS FOR APPEAL:

Filing Report/Requesting Extension Impracticable by Deadline

GROUND(S) FOR RELIEF:

Petitioner states that they have a disability that impacts their memory and their ability to remember deadlines.

REPORT(S) APPEALED:

6/1/2026

- Penalty Assessed (\$1000) 6/2/2026 by ELECT

RELIEF REQUESTED:

Forgiveness of the Assessed Penalty (\$1000)

LATE FILING HISTORY:

9/15/2023	\$100 UNPAID
10/16/2023	\$1,000 UNPAID
6/3/2024	\$100 UNPAID
6/2/2025	\$100 UNPAID
9/15/2025	\$1000 UNPAID
10/15/2025	\$1000 UNPAID
4/15/2026	\$100 UNPAID

AGGRAVATING FACTOR(S):

7 Days to File

Committee did not login to COMET to attempt to submit a report prior to the deadline.

Committee was emailed reminders prior to the deadline.

SUGGESTED MOTIONS:

GRANT, AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*requested relief is forgiveness of the assessed penalty*)."

GRANT, NOT AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(*state relief to be granted if different than requested*)."

DISMISS PETITION: "Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner's appeal of the assessed campaign finance penalty(s) for failure to show good cause."

ELECT COMMENT(S):

Committees are required to file reports regardless of activity, and committee received two email reminders prior to the deadline.

- See ELECT Supporting Documents

Committee did not login, since the January 15, 2026 report, in COMET during the filing period.

- See ELECT Supporting Documents

APPEAL PETITION AND PETITIONER SUPPLIED DOCUMENTS

Penalty Appeal for Committee: Fight For Fairfax - PAC-22-00038

[Print](#)

Petitioner Information

Email Address: fightforfairfax@gmail.com

First Name: Amini

Middle Name:

Last Name: Bonane

Role in Committee: COMET Administrator

Address Line 1: 10332 Main Street

Address Line 2: 135

Suite:

City: Fairfax **State:** VA **Zip:** 22030

Phone Number: (703) 628-5850

Are you appealing a penalty issued to a Committee or Individual? Committee

Penalized Committee Information

Committee Name: Fight For Fairfax

Committee Code: PAC-22-00038

Address Line 1: 10332 Main Street

Address Line 2:

Suite: 135

City: Fairfax **State:** VA **Zip:** 22030

Report Information

Filing Period Start: 4/1/2026 12:00:00 AM

Filing Period End: 3/25/2026 12:00:00 AM

Filing Deadline for Report: 6/1/2026 12:00:00 AM

Date Report was Submitted: 6/22/2026 12:00:00 AM

Penalty Information

Issuing Entity: Virginia Dept. of Elections

Invoice Number: PAC-22-00038-108

Date of Penalty: 6/2/2026 12:00:00 AM

Amount of Penalty: \$1,000.00

Date of Receipt of Penalty Notice: 6/22/2022 12:00:00 AM

Appeal Information

Reason for Appeal:

- Circumstances made filing the required report or requesting an extension by the deadline impracticable.

Grounds for Appeal: I respectfully request relief from the assessed penalty for the June 1, 2026 filing deadline. Fight For Fairfax PAC was established to support voter registration and civic engagement efforts. Throughout its existence, the committee has never accepted any contributions, made any expenditures, incurred any debts, or conducted any financial transactions. Every report filed reflects zero receipts and zero disbursements. I acknowledge that I was responsible for filing the required reports on time, even when there was no financial activity. Because of my disability, I have significant difficulty remembering recurring filing deadlines, which contributed to these late filings. I did not intentionally fail to comply with Virginias campaign finance laws or attempt to conceal any financial activity. I also was unaware that there was a formal penalty appeal process until I contacted the Department of Elections regarding these penalties. The committee has never handled campaign funds, and there was no public financial information withheld. I respectfully ask the State Board of Elections to find good cause and grant relief from the assessed penalty.

Relief Sought: I respectfully request that the State Board of Elections waive the civil penalty assessed for the June 1, 2026 filing deadline. In light of the committees complete lack of financial activity, my disability affecting my ability to track recurring deadlines, and my good-faith efforts to comply with the reporting requirements, I respectfully request that the Board grant the maximum relief permitted under Virginia law.

Emails

View Email	Subject	When	Who	Email Sent
View Email	Your Penalty Appeal form has been Received	07/02/2026 2:21 PM	fightforfairfax@...	Sent

Notes

Attachments

Fight For Fairfax - PAC-22-00038

Contacts

Committee: Fight For Fairfax

Subject: Notice of Penalty Assessed For Fight For Fairfax PAC-22-00038

Email Content:

 *** VIRGINIA ***
DEPARTMENT of ELECTIONS

The report due 6/1/2026 11:59:59 PM for filing period 04/01/2026 through 05/25/2026 has not been received by the Department of Elections to date. You are required to file reports according to your report schedule, even if there is no activity during the given filing period.

The penalty for failure to file a timely report has been assessed at \$1000. Please refer to Invoice Number PAC-22-00038-108 when making payment.

If the report has not been received by the Department of Elections within 60 days of the due date, a certified letter may be sent to the Committee's main address.

If the penalty has not been paid within 100 days of the due date, a notification will be sent to the Commonwealth's Attorney to pursue collection of this penalty.

You may login to the following Website to view your report schedule, enter expenditures, receipts, loans, and debts, and review and submit reports:

<https://cf.elections.virginia.gov/>

Pursuant to Va. Code Section 24.2-953.6(A), if circumstances made it impracticable to file or request an extension by the deadline or the penalty was wrongfully assessed due to an administrative error, you may file an appeal to the State Board within 60 days of receipt of the penalty at [Appeal](#).

Pursuant to Va. Code Section 24.2-953.6(C), the State Board may, in its discretion, grant relief for good cause shown. For questions related to the appeal process, please contact CFAppeals@elections.virginia.gov.

If you feel you have received this email in error or if there are any general questions related to the penalty, please contact us at CFDA@elections.virginia.gov.

Department of Elections
Campaign Finance
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219
800-552-9745
cfda@elections.virginia.gov

Sent: 6/2/2026 12:04:00 AM

Sent By: Entered by: [Agent, SQL Execute](#)
Sent From: cfda@elections.virginia.gov

View Email	Subject	When	Who	Email Sent
View Email	Notice of Penalty Assessed For Fight For Fairfax PA...	06/02/2026 12:04 AM	Agent, SQL Execu...	Sent

ELECT
SUPPORTING
DOCUMENT(S)

LOGIN ACTIVITY FOR FIGHT FOR FAIRFAX

COMET User Activity - Login Information

Show 10 entries

Search:

User Name	Time Accessed	Details
	9/22/2025 4:44:51 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	9/22/2025 4:48:13 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	9/22/2025 4:56:48 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	10/18/2025 11:08:12 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	1/15/2026 11:57:05 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	6/22/2026 9:43:15 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	6/22/2026 9:52:48 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	6/22/2026 6:28:55 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	6/23/2026 8:47:08 AM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."
	7/1/2026 12:33:29 PM	{ "Information": [{ "ResourceInfo": "Login Successful", "ControllerAction..."

Showing 1 to 10 of 11 entries (filtered from 55,754 total entries)

EMAIL NOTICES FOR DEADLINE

Reporting Period for Fight For Fairfax - PAC-22-00038

X

Report Type: Scheduled
 Filing Status: Late 
 Begin Date: 04/01/2026
 End Date: 05/25/2026
 Due Date: 06/01/2026 11:59 PM
 Date Filed: 06/22/2026 6:29 PM

Submitted On	Submitted By	Is Amendment?	Final Report
6/22/2026 6:29:42 PM			No View Report

Emails

View Email	Subject	When	Who	Email Sent
View Email	06/01/2026 Report Received	06/22/2026 6:30 PM	Bonane, Amini	Sent

Emails

View Email	Subject	When	Who	Email Sent
View Email	Notice of Report Due for Fight For Fairfa...	05/25/2026 6:06 AM	Agent, SQL Exec...	Sent
View Email	Notice of Report Due for Fight For Fairfa...	05/31/2026 6:13 AM	Agent, SQL Exec...	Sent

Notes

Attachments

VIRGINIA 3RD DISTRICT GOP (PP-12-00626)**BASIS FOR APPEAL:**

Filing Report/Requesting Extension Impracticable by Deadline

GROUND(S) FOR RELIEF:

Petitioner states that due to organization changes, the new treasurer did not have access to the committee to file reports in COMET. The Treasurer was unable to contact the previous Treasurer to get access to the filing system, due to the previous Treasurer moving out-of-state.

REPORT(S) APPEALED:

7/15/2026

- Penalty Assessed (\$1000) 7/16/2026 by ELECT

RELIEF REQUESTED:

Forgiveness of the Assessed Penalty (\$1000)

LATE FILING HISTORY:

1/16/2017	\$100 UNPAID
1/15/2025	\$100 PAID
1/15/2026	\$100 PAID
4/15/2026	\$100 UNPAID

MITIGATING FACTOR(S):

Treasurer did not have access to the committee in COMET.

AGGRAVATING FACTOR(S):

15 Days to File
Committee was emailed reminders prior to the deadline.

SUGGESTED MOTIONS:

GRANT, AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*requested relief is forgiveness of the assessed penalty*)."

GRANT, NOT AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(*state relief to be granted if different than requested*)."

DISMISS PETITION: "Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner's appeal of the assessed campaign finance penalty(s) for failure to show good cause."

ELECT COMMENT(S):

Treasurer emailed ELECT on July 15th and was instructed to get access from the previous Treasurer. The current Treasurer visited ELECT on July 27, 2026 to get access to the committee account in COMET.

- See ELECT Supporting Documents

APPEAL PETITION
AND PETITIONER
SUPPLIED DOCUMENTS

Penalty Appeal for Committee: Virginia 3rd District GOP - PP-12-00626

Print

Petitioner Information

Email Address: [REDACTED]

First Name: Anthony

Middle Name: Wayne

Last Name: Goodwin

Role in Committee: Treasurer

Address Line 1: 900 High Street

Address Line 2:

Suite:

City: Portsmouth State: VA Zip: 23704

Phone Number: [REDACTED]

Are you appealing a penalty issued to a Committee or Individual? Committee

Penalized Committee Information

Committee Name: Virginia 3rd District GOP

Committee Code: PP-12-00626

Address Line 1: 900 High Street

Address Line 2:

Suite:

City: Portsmouth State: VA Zip: 23704

Report Information

Filing Period Start: 4/1/2026 12:00:00 AM

Filing Period End: 6/30/2026 12:00:00 AM

Filing Deadline for Report: 7/15/2026 12:00:00 AM

Date Report was Submitted: 8/10/2026 12:00:00 AM

Penalty Information

Issuing Entity: Virginia Dept. of Elections

Invoice Number: PP-12-00626-104

Date of Penalty: 7/16/2026 12:00:00 AM

Amount of Penalty: \$1,000.00

Date of Receipt of Penalty Notice: 7/16/2026 12:00:00 AM

Appeal Information

VA 3RD DISTRICT
GOP 3

Reason for Appeal:

- Circumstances made filing the required report or requesting an extension by the deadline impracticable.

Grounds for Appeal: As the new treasurer since December of 2025 when our former treasurer moved out of state and our other administrator did not have credentials to connect me. There were difficulties assigning me to the account. Many attempts by phone calls and emails to customer service to establish my link was not completed before the July 15th deadline for the report. Since I was receiving notices from the COMET system as far back as May I felt confident I was linked properly. It wasn't until I made an in person visit to the Department in Richmond on July 27th with a letter to approve my access from the chairwomen Miki Miller.

Relief Sought: We have accepted the the fact that the end of the year and the 1st quarter reports were assessed the 100 fees but we are seeking relief from the 1000 fee from the late filing of July 15th report. Now that access has been approved all future filings will be made on time to not see this delay happen again.

File Uploads:

File Type	File
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Emails				
View Email	Subject	When	Who	Email Sent
View Email	Your Penalty Appeal form has been Received	08/12/2026 10:33 PM	agoodwinre1@...	Sent
Notes				
Attachments				

Virginia 3rd District GOP - PP-12-00626

Contacts

Committee	Virginia 3rd District GOP	
Treasurer	Anthony	Goodwin
Admin	Anna	Van Laethem
Admin	Miki	Miller

Subject: Notice of Penalty Assessed For Virginia 3rd District GOP PP-12-00626

Email Content:



The report due 7/15/2026 11:59:59 PM for filing period 04/01/2026 through 06/30/2026 has not been received by the Department of Elections to date. You are required to file reports according to your report schedule, even if there is no activity during the given filing period.

The penalty for failure to file a timely report has been assessed at \$1000. Please refer to Invoice Number PP-12-00626-104 when making payment.

If the report has not been received by the Department of Elections within 60 days of the due date, a certified letter may be sent to the Committee's main address.

If the penalty has not been paid within 100 days of the due date, a notification will be sent to the Commonwealth's Attorney to pursue collection of this penalty.

You may login to the following Website to view your report schedule, enter expenditures, receipts, loans, and debts, and review and submit reports:

<https://cf.elections.virginia.gov/>

Pursuant to Va. Code Section 24.2-953.6(A), if circumstances made it impracticable to file or request an extension by the deadline or the penalty was wrongfully assessed due to an administrative error, you may file an appeal to the State Board within 60 days of receipt of the penalty at <https://cfapps.elections.virginia.gov/Appeal>.

Pursuant to Va. Code Section 24.2-953.6(C), the State Board may, in its discretion, grant relief for good cause shown. For questions related to the appeal process, please contact CFAppeals@elections.virginia.gov.

If you feel you have received this email in error or if there are any general questions related to the penalty, please contact us at CFDA@elections.virginia.gov.

Department of Elections
Campaign Finance
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219
800-552-9745
cfda@elections.virginia.gov

Sent: 7/16/2026 12:02:00 AM

Sent By: Entered by: [Agent SOL Execute](#)
Sent From: cfda@elections.virginia.gov

**ELECT
SUPPORTING
DOCUMENT(S)**

From: [SBE-CFDA, rr \(ELECT\)](#)
To: [Anthony Goodwin; SBE-CFDA, rr \(ELECT\)](#)
Subject: RE: VA 3rd District GOP PP-12-006266
Date: Wednesday, July 15, 2026 10:57:00 AM

Good Morning,

We cannot file reports for committees, that is their responsibility. If you do not have access to your committee then you need to get access with your admins, who are Miki Miller and Anna Laethem. Please contact them to get you access.

Thank you,
Emily Mynarski
Campaign Finance Training and Compliance Specialist
Department of Elections
Emily.Mynarski@elections.virginia.gov

Campaign Finance Filing Resources:

[Virginia Department of Elections Campaign Finance Tutorials - YouTube](#)

[Candidate Campaign Committee Laws Summary](#)

[Campaign Finance Laws and Policies](#)

[COMET Login Portal](#)

This message, including any attachments, may summarize laws, regulations and policies of the Virginia Department of Elections or the Commonwealth of Virginia. Furthermore, this message and any responses sent to this email address may be subject to public disclosure under FOIA. For more information, please call the Virginia Department of Elections at 1-800-552-9745 or visit <https://www.elections.virginia.gov/e-mail-disclaimer/index.html>.

From: Anthony Goodwin [REDACTED]
Sent: Wednesday, July 15, 2026 10:37 AM
To: SBE-CFDA, rr (ELECT) <cfda@elections.virginia.gov>
Subject: VA 3rd District GOP PP-12-006266

Caution: This Email Originated Outside ELECT. Exercise Caution When Opening Attachments or Clicking Links, Especially From Unknown Senders.

I have been the treasurer of the 3rd district GOP since the first of the year and I have yet to be able to log in to file the reports. The past Treasurers are no longer available to make the change and add me. Please help me fix this to not be assessed another late filing fee. If someone in the office has access to the account could we request the numbers be inputted to show no activity in both time periods presently and before.

**VA 3RD DISTRICT
GOP 7**

I will be in Richmond on Monday the 20th and I would like to request a time to meet face to face and solve this problem.

Thank you,
Tony Goodwin
Treasurer 3rd District GOP

--



*Making it A Good Win for Buyer's,
Seller's, and Your Community!*
Mobile [REDACTED]

EMAIL REMINDERS FOR VIRGINIA 3RD DISTRICT GOP

Reporting Period for Virginia 3rd District GOP - PP-12-00626

X

Report Type:

Scheduled

Filing Status:

Late ⚠

Begin Date:

04/01/2026

End Date:

06/30/2026

Due Date:

07/15/2026 11:59 PM

Date Filed:

08/10/2026 7:58 PM

Submitted On	Submitted By	Is Amendment?	Final Report
8/10/2026 7:58:41 PM			No View Report

Emails

View Email	Subject	When	Who	Email Sent
View Email	07/15/2026 Report Received	08/10/2026 7:59 PM	Goodwin, Anth...	Sent

Emails

View Email	Subject	When	Who	Email Sent
View Email	Notice of Report Due for Virginia 3rd Dis...	07/05/2026 6:19 AM	Agent, SQL Exec...	Sent
View Email	Notice of Report Due for Virginia 3rd Dis...	07/12/2026 6:16 AM	Agent, SQL Exec...	Sent
View Email	Notice of Report Due for Virginia 3rd Dis...	07/12/2026 6:16 AM	Agent, SQL Exec...	Sent

Notes

Attachments

FACTOCRACY (PAC-26-00051)

BASIS FOR APPEAL:

Filing Report/Requesting Extension Impracticable by Deadline

GROUND(S) FOR RELIEF:

Petitioner states that they were not aware that they were legally required to file reports, they have raised/spent under \$300 during the missed filing period.

REPORT(S) APPEALED:

6/1/2026

- Penalty Assessed (\$100) 8/15/2026 by ELECT

RELIEF REQUESTED:

Forgiveness of the Assessed Penalty (\$100)

LATE FILING HISTORY:

No Prior Late Filings

MITIGATING FACTOR(S):

Treasurer did not know about the filing requirements.

AGGRAVATING FACTOR(S):

Filing requirements are on the Virginia Department of Elections website.

SUGGESTED MOTIONS:

GRANT, AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief as requested by the petitioner (*requested relief is forgiveness of the assessed penalty*)."

GRANT, NOT AS REQUESTED: "Pursuant to § 24.2-953.6 of the Code of Virginia, because the petitioner has demonstrated good cause to justify relief of the assessed campaign finance penalty(s), I move that the State Board of Elections grant relief ...(*state relief to be granted if different than requested*)."

DISMISS PETITION: "Pursuant to § 24.2-953.6 of the Code of Virginia, I move that the State Board of Elections dismiss the petitioner's appeal of the assessed campaign finance penalty(s) for failure to show good cause."

ELECT COMMENT(S):

Campaign Finance filing requirements are found on the Virginia Department of Elections website, and this includes filing requirements for Political Action committees.

APPEAL PETITION
AND PETITIONER
SUPPLIED DOCUMENTS

Penalty Appeal for Committee: Factocracy, Inc. - PAC-26-00051

[Print](#)

Petitioner Information

Email Address: [REDACTED]**First Name:** Cynthia**Middle Name:****Last Name:** Myer**Role in Committee:** Treasurer**Address Line 1:** 2211 W Grace St**Address Line 2:****Suite:****City:** Richmond **State:** VA **Zip:** 23220**Phone Number:** [REDACTED]**Are you appealing a penalty issued to a Committee or Individual?** Committee

Penalized Committee Information

Committee Name: Factocracy, Inc.**Committee Code:** PAC-26-00051**Address Line 1:** 2211 W Grace St**Address Line 2:****Suite:****City:** Richmond **State:** VA **Zip:** 23220

Report Information

Filing Period Start: 4/14/2026 12:00:00 AM**Filing Period End:** 5/26/2026 12:00:00 AM**Filing Deadline for Report:** 6/1/2026 12:00:00 AM**Date Report was Submitted:** 8/18/2026 12:00:00 AM

Penalty Information

Issuing Entity: Virginia Dept. of Elections**Invoice Number:** PAC-26-00051-101**Date of Penalty:** 8/15/2026 12:00:00 AM**Amount of Penalty:** \$100.00**Date of Receipt of Penalty Notice:** 8/15/2026 12:00:00 AM

Reason for Appeal:

- Circumstances made filing the required report or requesting an extension by the deadline impracticable.

Grounds for Appeal: We are a new organization, and did not realize we needed to file with the Virginia Department of Elections. As a 527 Political Organization, and new to this process, it was a research error on our part. However, our intention was not to circumvent the process or fail to file any necessary paperwork, and we now fully understand the need for accurate reporting. Our organization set-up was self-funded and our intentions were good. We acted as soon as it was brought to our attention by another organization that we needed to file the SOO. The late report was filed today. During the reporting period, we loaned the organization 95, and raised only 125. We will file timely reports going forward.

Relief Sought: Waive penalty, please.

Submitted - 8/18/2026 12:21:33 PM

Days Elapsed: 3

- ☐ Accept
- ☒ Send Review Email
- ☐ Reject

Clear Box

Select Additional Information

Submit

Emails

View Email	Subject	When	Who	Email Sent
View Email	Your Penalty Appeal form has been Received	08/18/2026 12:22 PM	factocracy.usa...	Sent

Notes

Attachments

Factocracy, Inc. - PAC-26-00051 X

Contacts

Committee	Factocracy, Inc.	
Custodian	Cynthia	Myer

Subject: Notice of Penalty Assessed For Factocracy, Inc. PAC-26-00051

Email Content:

 * VIRGINIA *
DEPARTMENT of ELECTIONS

The report due 6/1/2026 11:59:59 PM for filing period 04/14/2026 through 05/25/2026 has not been received by the Department of Elections to date. You are required to file reports according to your report schedule, even if there is no activity during the given filing period.

The penalty for failure to file a timely report has been assessed at \$100. Please refer to Invoice Number PAC-26-00051-101 when making payment.

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If the penalty has not been paid within 100 days of the due date, a notification will be sent to the Commonwealth's Attorney to pursue collection of this penalty.

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Pursuant to Va. Code Section 24.2-953.6(C), the State Board may, in its discretion, grant relief for good cause shown. For questions related to the appeal process, please contact CFAppeals@elections.virginia.gov.

If you feel you have received this email in error or if there are any general questions related to the penalty, please contact us at CFDA@elections.virginia.gov.

Department of Elections
Campaign Finance
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219
800-552-9745
cfda@elections.virginia.gov

Sent: 8/15/2026 12:01:00 AM

Sent By: Entered by: [Agent, SQL Execute](#)
Sent From: cfda@elections.virginia.gov

Principal Custodian Information

ELECT
SUPPORTING
DOCUMENT(S)

From: [SBE-CFDA, rr \(ELECT\)](#)
To: [Cynthia Myer](#); [SBE-CFDA, rr \(ELECT\)](#); [Alexander, Tammy \(ELECT\)](#)
Subject: RE: Help with Virginia filing for 527 Political Organization
Date: Thursday, August 13, 2026 4:21:00 PM

It was rejected, it needs the Principal Custodian section filled (you can also serve as the Principal Custodian). Once it gets resubmitted with the required changes, then you will get an acceptance notice and a filing schedule. Please review this document for other requirements: [Summary-of-Laws-and-Policies-for-Political-Action-Committees---PAC_Summary---2025-01-18.pdf](#)

Thank you,
Emily Mynarski
 Campaign Finance Training and Compliance Specialist
 Department of Elections
Emily.Mynarski@elections.virginia.gov

Please note I will be out of office from August 15, 2026 to September 1, 2026

Campaign Finance Filing Resources:

[Virginia Department of Elections Campaign Finance Tutorials - YouTube](#)
[Candidate Campaign Committee Laws Summary](#)
[Campaign Finance Laws and Policies](#)
[COMET Login Portal](#)

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From: Cynthia Myer [REDACTED]
Sent: Thursday, August 13, 2026 3:52 PM
To: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>; Alexander, Tammy (ELECT) <Tammy.Alexander@elections.virginia.gov>
Subject: Re: Help with Virginia filing for 527 Political Organization

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OK! So I've submitted the incorrect one while on the phone with Tammy and she deleted it (thank you!)

Now I've submitted the correct one. How do I access the information to file the necessary report? Is it due now or on September 15?

I really appreciate you helping me with this. It's (obviously!) my first rodeo!

Cynthia
[REDACTED]

From: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>

Sent: Thursday, August 13, 2026 2:21 PM

To: Cynthia Myer [REDACTED]; SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>; Alexander, Tammy (ELECT) <Tammy.Alexander@elections.virginia.gov>

Subject: RE: Help with Virginia filing for 527 Political Organization

Good Morning,

You can just fill out a new form type. Submit the incorrect one as well, and provide us with the ID# so we can remove it.

Thank you,

Emily Mynarski

Campaign Finance Training and Compliance Specialist

Department of Elections

Emily.Mynarski@elections.virginia.gov

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From: Cynthia Myer [REDACTED]

Sent: Thursday, August 13, 2026 2:00 PM

To: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>; Alexander, Tammy (ELECT) <tammy.alexander@elections.virginia.gov>

Subject: Re: Help with Virginia filing for 527 Political Organization

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Hi Emily,

Can you please clarify if my understanding it correct? I want to be in compliance.

Thanks so much,

Cynthia Myer

From: Cynthia Myer [REDACTED]
Sent: Thursday, August 13, 2026 12:28 PM
To: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>
Subject: Re: Help with Virginia filing for 527 Political Organization

Thanks. Just to be clear: even though we are a 527 Political Org for IRS purposes, I should still register as a regular PAC in Virginia?

I have a draft saved under Out of State Political Organizations. How do I delete this before filing as a regular PAC?

I appreciate your help!

Cynthia

From: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>
Sent: Thursday, August 13, 2026 12:14 PM
To: Cynthia Myer [REDACTED]; SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>; Alexander, Tammy (ELECT) <Tammy.Alexander@elections.virginia.gov>
Subject: RE: Help with Virginia filing for 527 Political Organization

If you are located in Virginia, then you need a regular PAC. Please see: [Summary-of-Laws-and-Policies-for-Political-Action-Committees---PAC_Summary---2025-01-18.pdf](#)

Emily Mynarski
Campaign Finance Training and Compliance Specialist
Department of Elections
Emily.Mynarski@elections.virginia.gov

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From: Cynthia Myer [REDACTED]
Sent: Thursday, August 13, 2026 12:12 PM
To: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>; Alexander, Tammy (ELECT) <Tammy.Alexander@elections.virginia.gov>
Subject: Re: Help with Virginia filing for 527 Political Organization

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We are located in Virginia, but our messaging is national. I'm not sure which entity type we should file under: Out of State Political Committee? I'm looking at the form online, and have a draft save, but don't want to hit the wrong button. Also, it mentions "other questions" but I can't see them until I submit.

Thank you,
 Cynthia

From: SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>
Sent: Thursday, August 13, 2026 10:57 AM
To: Cynthia Myer [REDACTED]; SBE-CFDA, rr (ELECT) <campaignfinance@elections.virginia.gov>; Alexander, Tammy (ELECT) <Tammy.Alexander@elections.virginia.gov>
Subject: RE: Help with Virginia filing for 527 Political Organization

Good Morning,

Where is this organization based out of, which state?

Thank you,
Emily Mynarski
 Campaign Finance Training and Compliance Specialist

Please note I will be out of office from August 15, 2026 to September 1, 2026

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From: Cynthia Myer [REDACTED]

Sent: Thursday, August 13, 2026 10:53 AM

To: SBE-CFDA, rr (ELECT) <cfda@elections.virginia.gov>; Alexander, Tammy (ELECT) <tammy.alexander@elections.virginia.gov>

Subject: Help with Virginia filing for 527 Political Organization

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Hi Tammy,

My husband and I started a 527 Political Organization, geared toward general messaging, not candidate specific. We plan to operate in multiple states.

My understanding is that we don't file (and can't even register) with the IRS until we hit the \$25,000 fundraising limit.

I'm not sure what to do about Virginia filing and want very much to stay in compliance. Can you please help me? I've looked at the website, read the documents, and am still not clear on what to do. I don't want to make an error!

I understand that your office is very helpful and we can talk on the phone. I would surely appreciate a call today.

Thank you,
Cynthia Myer



★ VIRGINIA ★
STATE BOARD *of* ELECTIONS

Closed Session

BOARD WORKING PAPERS

September 15, 2026

Closed Session

1. **Into closed session:** “Pursuant to Virginia Code Section 2.2-3711(A)(7), I move that the Board go into closed session for the purpose of discussing pending threatened litigation. In accordance with Section 2.2-3712(F), Steven Koski, Commissioner of Elections, Ashley Coles, Deputy Commissioner of Elections, and Ajay Saini, Office of the Attorney General, will attend the closed session because their presence will reasonably aid the Board in its consideration of the subject of the meeting.”

 a. After the motion is seconded, the Board members must vote (must be a roll call vote).

2. **Out of closed session:** “I move to reconvene the meeting in open session, and take a roll call vote certifying that to the best of each member’s knowledge (i) only such public business matters lawfully exempted from open meeting requirements under this chapter and (ii) only such public business matters as were identified in the motion by which the closed meeting was convened were heard or discussed by the State Board of Elections”

 a. After the motion is seconded, poll the members for each vote. Each member must vote individually and not as a group.