



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 7, 2021

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *KDR BH*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Withdrawal and Resubmission of Reason To Believe Recommendation –  
2020 July Quarterly Report for the Administrative Fine Program

We are withdrawing the document circulated to the Commission on September 11, 2020 in order to reflect updates disclosed in filings received by the Commission after the initial submission of this recommendation. An overview of these updates has been provided below.

Attached is a list of political committees and their treasurers who failed to file the 2020 July Quarterly Report in accordance with 52 U.S.C. § 30104(a). The July Quarterly Report was due on July 15, 2020.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

### **Recommendation**

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

Federal Election Commission  
Reason to Believe Circulation Report  
2020 JULY QUARTERLY Not Election Sensitive 07/15/2020 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
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3878	C00710608	FOR VIRGINIA	THOMAS A. SPECIALE	CARL ALLARD	\$151,568	0		Not Filed	\$37,892 (est)	\$1,252
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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
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3904	C00676320	UNITED FORWARD 2020 BENZEL FOR CONGRESS	JULIANNE ELIZABETH BENZEL	GREG DON BENZEL	\$206,748	0	7/28/2020	13	\$1,420	\$114
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Withdrawal and Resubmission of Reason )  
To Believe Recommendation - 2020 July )  
Quarterly Report for the Administrative )  
Fine Program: )

Federal Election Commission  
Withdrawal and Resubmission of Reason  
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FOR VIRGINIA, and ALLARD, CARL as ) AF# 3878  
treasurer; )

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UNITED FORWARD 2020 BENZEL FOR ) AF# 3904  
CONGRESS, and BENZEL, GREG DON )  
MR. as treasurer; )

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CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on January 08, 2021, the Commission took the following actions on the Withdrawal and Resubmission of Reason To Believe Recommendation - 2020 July Quarterly Report for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated January 07, 2021, on the following committees:

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AF#3878 Decided by a vote of 6-0 to: (1) find reason to believe that FOR  
VIRGINIA, and ALLARD, CARL in his official capacity as treasurer violated 52 U.S.C.  
30104(a) and make a preliminary determination that the civil money penalty would be the

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amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3904      Decided by a vote of 6-0 to: (1) find reason to believe that UNITED FORWARD 2020 BENZEL FOR CONGRESS, and BENZEL, GREG DON MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.



February 5, 2021

Date

Attest:

**Laura  
Sinram**

Laura E. Sinram

Acting Secretary and Clerk of the  
Commission

Digitally signed by  
Laura Sinram  
Date: 2021.02.05  
15:39:37 -05'00'



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

February 5, 2021

Carl Allard, in official capacity as Treasurer  
For Virginia  
4196 Merchants Plaza, Suite 434  
Woodbridge, VA 22192

C00710608  
AF#: 3878

Dear Mr. Allard,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a July Quarterly Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period June 4, 2020 through June 30, 2020, shall be filed no later than July 15, 2020. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On January 8, 2021, the FEC found that there is reason to believe ("RTB") that For Virginia and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before July 15, 2020. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$1,252. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <https://www.fec.gov/af/pay.shtml> 11 CFR § 111.34. Your payment of \$1,252 is due within forty (40) days of the finding, or by February 17, 2021, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$37,892  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

FOR VIRGINIA

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**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or February 17, 2021. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

Please note, on June 18, 2020, the Federal Election Commission began the initial phase (Phase I) of its return to normal operations. At this stage, the agency's offices will remain closed to visitors and most of its employees will continue to telework in an effort to limit the spread of coronavirus (COVID-19). The Commission is processing some documents submitted by mail, though processing will not occur daily until the agency resumes normal mail operations. Nevertheless, a challenge to an RTB finding and/or calculated civil money penalty must be received on time. Thus, all written responses and supporting documentation should be converted to PDF (Portable Document Format) and must be emailed to [administrativefines@fec.gov](mailto:administrativefines@fec.gov). The Commission encourages the use of electronic signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted challenges will be deemed received on the date it is electronically received by staff.

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). For a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates;

FOR VIRGINIA

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and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

**2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that For Virginia and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 et seq. The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

**5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected.

FOR VIRGINIA

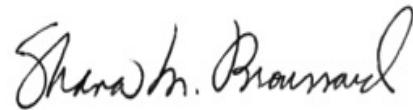
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Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <https://www.fec.gov/af/pay.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,



Shana M. Broussard  
Chair

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#### ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$1,252 for the July Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](https://www.fec.gov/af/pay.shtml) to be directed to Pay.gov's Administrative Fine Program Payment form. Please use the details below to complete the required fields. For additional payment options, please contact Ben Holly in the Reports Analysis

FOR VIRGINIA

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Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

COMMITTEE NAME: For Virginia

FEC ID#: C00710608

AF#: 3878

PAYMENT DUE DATE: February 17, 2021

PAYMENT AMOUNT DUE: \$1,252

To whom it may concern,

This letter is in reference to the recent determinations to levy fines due to our failing to file our committee reports for the July Quarterly Report of Receipts and Disbursements (C00710608, AF#: 3878 ) and the October Quarterly Report of Receipts and Disbursements (C00710608, AF#: 3941) in a calendar year during which there is a regularly scheduled election.

However, we were unable to file these reports due to a number of issues beyond our control which we believe falls into the category of a disaster-related incident. Namely, the COVID-19 pandemic.

Administratively I was able to transition the campaign to a multi-candidate PAC however, this epidemic severely disrupted our committee activities. Despite this, I was personally able to recreate missing filings and complete our filings at the earliest possible opportunity and did file these reports as soon as humanly possible.

It is our hope that these circumstances will be taken into consideration and waive our fines due to these economically disastrous events.

Finally, our committee has not been able to raise funds due to the social distancing requirements imposed in Virginia and has cause disruptions financially and personally for the officers of the committee and these fines would only exacerbate an already extremely difficult financial situation.

Thank you for your concern and consideration.

Tom Speciale

A handwritten signature in black ink, appearing to read "Tom Speciale".



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 16, 2021

**REVIEWING OFFICER RECOMMENDATION  
OFFICE OF ADMINISTRATIVE REVIEW (“OAR”)**

AF# 3878 and AF# 3941 – For Virginia<sup>1</sup> and Carl Allard, in his official capacity as Treasurer (C00710608)

**Summary of Recommendation**

Make a final determination in AF# 3878 that the respondents violated 52 U.S.C. § 30104(a) and assess a \$347 civil money penalty.

Make a final determination in AF# 3941 that the respondents violated 52 U.S.C. § 30104(a) and assess a \$556 civil money penalty.

**Reason-to-Believe Background**

The 2020 July Quarterly Report was due on July 15, 2020. The respondents filed the report on January 29, 2021, 198 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1). On January 8, 2021, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 July Quarterly Report and made a preliminary determination that the civil money penalty was \$1,252 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was sent to the respondents’ email address of record from the Reports Analysis Division (“RAD”) on February 5, 2021 to notify them of the Commission’s RTB finding and civil money penalty.

The 2020 October Quarterly Report was due on October 15, 2020. The respondents filed the report on January 29, 2021, 106 days late. The report is election sensitive and was not filed prior to 4 days before the 2020 General Election; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2). On January 8, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 October Quarterly Report and made a preliminary determination that the civil money penalty was \$1,947 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was sent to the respondents’ email address of

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<sup>1</sup> On 7/1/19, the Committee registered as a principal campaign committee under the name Tom Speciale for Virginia. On 7/13/20, the Committee filed an Amended Statement of Organization (FEC Form 1) to convert to a political action committee. At this time, the Committee also changed its name to For Virginia.

record from RAD on February 8, 2021 to notify them of the Commission's RTB finding and civil money penalty.

## **Legal Requirements**

The Federal Election Campaign Act ("Act") states that the treasurer of a principal campaign committee of a candidate shall file a report for the period ending June 30 no later than July 15. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(a)(1)(i). The Act states that the treasurer of a political committee not authorized by a candidate shall file, in an election year, a report for the period ending September 30 no later than October 15. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(1)(i). Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on July 15 for the July Quarterly Report to be timely filed and October 15 for the October Quarterly Report to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

## **Summary of Respondents' Challenge**

On February 17, 2021, the Commission received the written response ("challenge") from the former Candidate who is now serving as the Director of the political action committee. He states, in part:

...we were unable to file these reports due to a number of issues beyond our control which we believe falls into the category of a disaster-related incident. Namely, the COVID-19 pandemic.

Administratively I was able to transition the campaign to a multi-candidate PAC however, this epidemic severely disrupted our committee activities. Despite this, I was personally able to recreate missing filings and complete our filings at the earliest possible opportunity and did file these reports as soon as humanly possible.

The Director also notes that the Committee has not been able to fundraise due to social distancing requirements, which has financially and personally impacted the Committee's officers. He states that the "fines would only exacerbate an already extremely difficult financial situation" and requests that the Commission waive the penalties due the circumstances.

## **Analysis**

The respondents contend they were unable to timely file the 2020 July and October Quarterly Reports due to impacts of COVID-19, which they state is a circumstance that was unforeseen and beyond the Committee's control. The Reviewing Officer acknowledges the COVID-19 pandemic may have impacted the Committee's normal operations.<sup>2</sup>

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<sup>2</sup> The respondents did not dispute nor contend they were unaware of the filing requirements. Commission records indicate the Commission appropriately notified and reminded the Committee of its reporting requirements on multiple occasions. *See* Attachments 2, 3, and 4.

In accordance with 11 C.F.R. § 111.35, the FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond the respondents' control. The "best efforts" defense is a two-part test: the respondents used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control, and they filed the report no later than 24 hours after the end of these circumstances.

The Commission states in its *Explanation and Justification for Revised 11 CFR § 111.35(b)(3) – "Best Efforts" Defense*, 72 Fed. Reg. 14662, 14664-14666 (Mar. 29, 2007) that respondents must show

"...that the reasonably unforeseen circumstances in fact *prevented* the timely and proper filing of the required report...[T]his rule requires a strict causal relationship between the circumstances described in the challenge...and the respondent's inability to file the report timely. It is not sufficient for reasonably unforeseen circumstances to make it merely more difficult than usual for the respondent to file on time. The circumstance must cause the respondent to be *unable* to file in a timely and proper manner, despite the respondent attempting to use all available methods of filing." (emphasis included)

While the Reviewing Officer recognizes COVID-19 and its related impacts may potentially be considered a reasonably unforeseen circumstance beyond a committee's control, the respondents did not demonstrate that the unforeseen circumstances directly *prevented* the respondents from filing the report by the July 15, 2020 and October 15, 2020 filing deadlines. Nor did the respondents demonstrate that they filed the report no later than 24 hours after the end of a circumstance considered to be unforeseen and beyond the respondents' control. Therefore, the "best efforts" defense does not succeed. Further, unavailability of committee staff and computer/software failures are specifically included at 11 C.F.R. § 111.35(d) as examples of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) in AF# 3878 and AF# 3941.

At the time of the RTB finding, the Commission used an estimated level of activity (\$37,892) to calculate the penalty because the 2020 July Quarterly Report had not yet been filed. 11 C.F.R. § 111.43(d)(2). On January 29, 2021, the Committee filed the 2020 July Quarterly Report, 198 days late. The 2020 July Quarterly Report discloses \$0 in total receipts and \$3,149 in total disbursements during the reporting period.<sup>3</sup> Therefore, the actual level of activity for the 2020 July Quarterly reporting period is \$3,149. 11 C.F.R. § 111.43(d)(3). Using the schedule of penalties at 11 C.F.R. § 111.43(a), a penalty of \$347 should be assessed.

At the time of the RTB finding, the Commission used an estimated level of activity (\$37,892) to calculate the penalty because the 2020 October Quarterly Report had not yet been filed.

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<sup>3</sup> On 2/2/21, the Committee filed an Amended 2020 July Quarterly Report which disclosed no change in the amount of total receipts and total disbursements.

11 C.F.R § 111.43(d)(2). On January 29, 2021, the Committee filed the 2020 October Quarterly Report, 106 days late. The 2020 October Quarterly Report discloses \$525 in total receipts and \$31 in total disbursements during the reporting period.<sup>4</sup> Therefore, the actual level of activity for the 2020 October Quarterly reporting period is \$556. 11 C.F.R § 111.43(d)(3). Using the schedule of penalties at 11 C.F.R § 111.43(b), a penalty of \$556 should be assessed.

### **OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 3878 involving For Virginia and Carl Allard, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3878 that For Virginia and Carl Allard, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$347 civil money penalty (reduced from the RTB civil money penalty of \$1,252);
3. Adopt the Reviewing Officer recommendation for AF# 3941 involving For Virginia and Carl Allard, in his official capacity as Treasurer, in making the final determination;
4. Make a final determination in AF# 3941 that For Virginia and Carl Allard, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$556 civil money penalty (reduced from the RTB civil money penalty of \$1,947); and
5. Send the appropriate letters.

### **Attachments**

Attachment 1 –

Attachment 2 –

Attachment 3 –

Attachment 4 – Declaration from RAD

Attachment 5 – Declaration from OAR

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<sup>4</sup> On 2/2/21, the Committee filed an Amended 2020 October Quarterly Report which disclosed no change in the amount of total receipts and total disbursements.

## **DECLARATION OF KRISTIN D. ROSER**

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission (“Commission”). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to For Virginia:
  - A) Non-Filer Letter, dated July 30, 2020, referencing the 2020 July Quarterly Report (sent via electronic mail to: [thomas.speciale@gmail.com](mailto:thomas.speciale@gmail.com));
  - B) Non-Filer Letter, dated October 30, 2020, referencing the 2020 October Quarterly Report (sent via electronic mail to: [thomas.speciale@gmail.com](mailto:thomas.speciale@gmail.com));
  - C) Reason-to-Believe Letter, dated February 5, 2021, referencing the 2020 July Quarterly Report (sent via electronic mail to: [thomas.speciale@gmail.com](mailto:thomas.speciale@gmail.com)).
  - D) Reason-to-Believe Letter, dated February 8, 2021, referencing the 2020 October Quarterly Report (sent via electronic mail to: [thomas.speciale@gmail.com](mailto:thomas.speciale@gmail.com)).
4. I hereby certify that I have searched the Commission’s public records and find that For Virginia filed the 2020 July Quarterly Report and the 2020 October Quarterly Report with the Commission on January 29, 2021.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed on the 11<sup>th</sup> day of March, 2021.

Kristin D. Roser

Kristin D. Roser  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

July 30, 2020

ALLARD, CARL, TREASURER  
FOR VIRGINIA  
4196 MERCHANTS PLAZA  
SUITE 434  
WOODBRIDGE, VA 22192

IDENTIFICATION NUMBER: C00710608

REFERENCE: JULY QUARTERLY REPORT (06/04/2020 - 06/30/2020)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

You will be allowed until 5:00 pm est on the fourth (4th) business day from the date of this notice to file this report to avoid publication. If you have already filed the report by express, certified or registered mail or are planning to file it within four (4) business days from the date of this notice, please notify us immediately of the certified, registered or express tracking number and the date that the report was sent.

If you are a paper filer, the report must be filed with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note, on June 18, 2020, the Federal Election Commission began the initial phase (Phase I) of its return to normal operations. At this stage, the agency's offices will remain closed to visitors and most of its employees will continue to telework in an effort to limit the spread of coronavirus (COVID-19). The Commission is processing some documents submitted by mail, though processing will not occur on a daily basis until the agency resumes normal mail operations. Reports sent by registered mail, overnight delivery, or certified mail, are considered filed with the FEC as of the date of the postmark. Reports submitted by first-class mail will be considered filed when actually received by Commission staff, subject to delays resulting from the agency's limited mail processing. The Commission will not be able to receive or process reports filed by courier service during Phase I. The FEC does not have statutory authority to extend filing deadlines, but it may choose not to pursue administrative fines against filers prevented from filing by reasonably unforeseen circumstances beyond their control.

Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent

FOR VIRGINIA

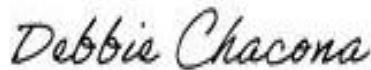
Page 2 of 2

State officer unless the state is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at [www.fec.gov](http://www.fec.gov).

In addition, the failure to timely file this report may result in civil money penalties, an audit or other legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report.

If you have any questions regarding this matter, please contact Ben Holly in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1129.

Sincerely,



Deborah Chacona  
Assistant Staff Director  
Reports Analysis Division

250

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

October 30, 2020

ALLARD, CARL, TREASURER  
FOR VIRGINIA  
4196 MERCHANTS PLAZA  
SUITE 434  
WOODBRIDGE, VA 22192

IDENTIFICATION NUMBER: C00710608

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2020 - 09/30/2020)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note, on June 18, 2020, the Federal Election Commission began the initial phase (Phase I) of its return to normal operations. At this stage, the agency's offices will remain closed to visitors and most of its employees will continue to telework in an effort to limit the spread of coronavirus (COVID-19). The Commission is processing some documents submitted by mail, though processing will not occur on a daily basis until the agency resumes normal mail operations. Reports sent by registered mail, overnight delivery, or certified mail, are considered filed with the FEC as of the date of the postmark. Reports submitted by first-class mail will be considered filed when actually received by Commission staff, subject to delays resulting from the agency's limited mail processing. The Commission will not be able to receive, or process reports filed by courier service during Phase I. The FEC does not have statutory authority to extend filing deadlines, but it may choose not to pursue administrative fines against filers prevented from filing by reasonably unforeseen circumstances beyond their control.

Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at [www.fec.gov](http://www.fec.gov).

The failure to timely file this report may result in civil money penalties, suspension of

FOR VIRGINIA

Page 2 of 2

matching funds payments, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Jamie Sikorsky in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1137.

Sincerely,



Deborah Chacona  
Assistant Staff Director  
Reports Analysis Division

250

**DECLARATION OF RHIANNON MAGRUDER**

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission (“Commission”). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A principal campaign committee of a candidate shall file a report for the period ending June 30 no later than July 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time July 15, 2020 for the 2020 July Quarterly Report to be timely filed.
- 3) A political committee not authorized by a candidate shall file, in an election year, a report for the period ending September 30 no later than October 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time October 15, 2020 for the 2020 October Quarterly Report to be timely filed.
- 4) I hereby certify that I have searched the Commission’s public records and that the documents identified herein are the true and accurate copies of:
  - a) Amended Statement of Organization electronically filed by For Virginia on July 13, 2020.
  - b) Cover, Summary, and Detailed Summary Pages of the 2020 July Quarterly Report filed by For Virginia. The report includes the coverage period of June 4, 2020 through June 30, 2020 and was electronically filed on January 29, 2021.
  - c) Cover, Summary, and Detailed Summary Pages of the 2020 October Quarterly Report filed by For Virginia. The report includes the coverage period of July 1, 2020 through October 30, 2020 and was electronically filed on January 29, 2021.
- 5) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on the 15<sup>th</sup> day of April, 2021.

*Rhiannon Magruder*  
Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

FEC  
FORM 1STATEMENT OF  
ORGANIZATION

Office Use Only

1. NAME OF  
COMMITTEE (in full)(Check if name  
is changed)Example: If typing, type  
over the lines.

12FE4M5

For Virginia

ADDRESS (number and street)

4196 Merchants Plaza

 (Check if address  
is changed)

Suite 434

Woodbridge

VA

22192

CITY ▲

STATE ▲

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

 (Check if address  
is changed)

thomas.speciale@gmail.com

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

 (Check if address  
is changed)

thomassspeciale.com

2. DATE

M M / D D / Y Y Y Y  
07 / 01 / 2019

3. FEC IDENTIFICATION NUMBER ►

C C00710608

4. IS THIS STATEMENT



NEW (N)

OR



AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Allard, Carl, , ,

Signature of Treasurer

Allard, Carl, , ,

[Electronically Filed]

Date

M M / D D / Y Y Y Y  
07 / 13 / 2020NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.  
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.Office  
Use  
OnlyFor further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-694-1100FEC FORM 1  
(Revised 06/2012)

## 5. TYPE OF COMMITTEE

### **Candidate Committee:**

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)

(b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of  
Candidate

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

Candidate  
Party Affiliation

10

Office  
Sought

## House

## Senate

## President

### State

10

## District

- (c) This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of  
Candidate

11. *What is the primary purpose of the following sentence?*

### Party Committee:

- (d) This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

### **Political Action Committee (PAC):**

- (e)  This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

Corporation       Corporation w/o Capital Stock       Labor Organization

Membership Organization       Trade Association       Cooperative

In addition, this committee is a Lobbyist/Registrant PAC.

(f)  This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

In addition, this committee is a Lobbyist/Registrant PAC.

In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

### Joint Fundraising Representative:

- (g) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.

(h) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

#### Committees Participating in Joint Fundraiser

- |    |  |               |  |  |
|----|--|---------------|--|--|
| 1. | <input style="width: 150px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 10px; margin-right: 10px;" type="text"/> | FEC ID number | <input style="width: 150px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 10px; margin-right: 10px;" type="text"/> | <input style="width: 15px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 5px;" type="text"/> |
| 2. | <input style="width: 150px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 10px; margin-right: 10px;" type="text"/> | FEC ID number | <input style="width: 150px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 10px; margin-right: 10px;" type="text"/> | <input style="width: 15px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 5px;" type="text"/> |
| 3. | <input style="width: 150px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 10px; margin-right: 10px;" type="text"/> | FEC ID number | <input style="width: 150px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 10px; margin-right: 10px;" type="text"/> | <input style="width: 15px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 5px;" type="text"/> |
| 4. | <input style="width: 150px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 10px; margin-right: 10px;" type="text"/> | FEC ID number | <input style="width: 150px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 10px; margin-right: 10px;" type="text"/> | <input style="width: 15px; height: 20px; border: 1px solid black; border-radius: 5px; padding: 2px 5px;" type="text"/> |

Write or Type Committee Name

For Virginia

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

NONE

**Mailing Address**

1. **What is the primary purpose of the U.S. Constitution?**

11. *Leucosia* (Leucosia) *leucostoma* (Fabricius) (Fig. 11)

## CITY

## STATE

ZIP CODE

Relationship:  Connected Organization  Affiliated Committee  Joint Fundraising Representative  Leadership PAC Sponsor

**Custodian of Records:** Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name	Allard, Carl, ,
Mailing Address	4196 Merchants Plaza Suite 434 Woodbridge
	VA 22192-0000

Title or Position **CITY** **STATE** **ZIP CODE**  
Telephone number **702** **900** **4467**

8. **Treasurer:** List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer	Allard, Carl, ,
Mailing Address	4196 Merchants Plaza Suite 434 Woodbridge
	CITY      STATE      ZIP CODE
	VA      22192      -

Full Name of Designated Agent	Speciale, Thomas, Anthony, Mr., II		
Mailing Address	14940 Grassy Knoll Ct Woodbridge		
	CITY	STATE	ZIP CODE
Title or Position Director	Telephone number 831-521-5716		

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Bank of America

Mailing Address	12505 Dillingham Square Woodbridge		
	CITY	STATE	ZIP CODE

Name of Bank, Depository, etc.

Mailing Address			
	CITY	STATE	ZIP CODE

FEC  
FORM 3REPORT OF RECEIPTS  
AND DISBURSEMENTS  
For An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full) **TYPE OR PRINT ▼**Example: If typing, type  
over the lines.

12FE4M5

TOM SPECIALE FOR VIRGINIA

ADDRESS (number and street)

4196 MERCHANTS PLAZA

SUITE 434

WOODBRIDGE

VA

22192

▼  
 Check if different  
than previously  
reported. (ACC)

CITY ▲

STATE ▲

ZIP CODE ▲

2. FEC IDENTIFICATION NUMBER ▼

 C

C00710608

3. IS THIS  
REPORTNEW  
(N)AMENDED  
(A)

STATE ▼ DISTRICT

VA

00

## 4. TYPE OF REPORT (Choose One)

## (a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- Termination Report (TER)

## (b) 12-Day PRE-Election Report for the:

- Primary (12P)
- General (12G)
- Runoff (12R)
- Convention (12C)
- Special (12S)

Election on

M M / D D / Y Y Y Y

in the  
State of

## (c) 30-Day POST-Election Report for the:

- General (30G)
- Runoff (30R)
- Special (30S)

Election on

M M / D D / Y Y Y Y

in the  
State of

5. Covering Period

M M / D D / Y Y

through

M M / D D / Y Y

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Allard, Carl, Edward, ,

Type or Print Name of Treasurer

Allard, Carl, Edward, ,

Signature of Treasurer

[Electronically Filed]

Date

M M / D D / Y Y

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.

Office  
Use  
OnlyFEC FORM 3  
(Revised 05/2016)

Write or Type Committee Name  
TOM SPECIALE FOR VIRGINIA

Report Covering the Period: From:

M M 06 / D D 04 / Y Y 2020

To:

M M 06 / D D 30 / Y Y 2020

**COLUMN A**  
This Period

**COLUMN B**  
Election Cycle-to-Date

6. Net Contributions (other than loans)

- (a) Total Contributions (other than loans) (from Line 11(e)) ....
- (b) Total Contribution Refunds (from Line 20(d)) .....
- (c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)) .....

0.00	18062.81
0.00	0.00
0.00	18062.81

7. Net Operating Expenditures

- (a) Total Operating Expenditures (from Line 17) .....
- (b) Total Offsets to Operating Expenditures (from Line 14).....
- (c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)) .....

3149.00	53962.00
0.00	0.00
3149.00	53962.00

8. Cash on Hand at Close of Reporting Period (from Line 27).....

18115.91
----------

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) .....

0.00
------

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) .....

54114.10
----------

**For further information contact:**

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

## POST-ELECTION DETAILED SUMMARY PAGE

Report of Receipts and Disbursements

FEC Form 3 (Revised 07/05)

PAGE 3 / 21

- If the candidate participated in the general election, use this form for the 30-day Post-General report.
- If the candidate did NOT participate in the general election, use this form for the Year-end report covering through December 31 of the election year (due on January 31).

This form is used in lieu of filling out Line Numbers 6 through 7 on Page 2 (Summary Page) and Pages 3 and 4 (the Detailed Summary Page) for the last report filed by a candidate during the current election cycle.

Write or Type Committee Name

TOM SPECIALE FOR VIRGINIA

Report Covering the Period:

From:

M	M	/	D	D	/	Y	Y	Y	Y
06			04			20	20	20	20

To:

M	M	/	D	D	/	Y	Y	Y	Y
06			30			20	20	20	20

## I. RECEIPTS

COLUMN A  
Total this PeriodCOLUMN B  
Election Cycle Total as ofCOLUMN C  
Total for

M	M	/	D	D	/	Y	Y	Y	Y
06			23			20	20	20	20

(date of general election)

M	M	/	D	D	/	Y	Y	Y	Y
06			24			20	20	20	20

(date after general election)

through

M	M	/	D	D	/	Y	Y	Y	Y
06			30			20	20	20	20

(last day of reporting period)

## 11. CONTRIBUTIONS

(other than loans) FROM:

- (a) Individuals/Persons Other than Political Committees
- (i) Itemized (use Schedule A)

0.00

10150.00

0.00

(ii) Unitemized

0.00

7912.81

0.00

(iii) Total of contributions from individuals

0.00

18062.81

0.00

- (b) Political Party Committees

0.00

0.00

0.00

- (c) Other Political Committees

0.00

0.00

0.00

## POST-ELECTION DETAILED SUMMARY PAGE

Report of Receipts and Disbursements

FEC Form 3 (Revised 1/01)

PAGE 4 / 21

COLUMN A Total this Period	COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date)	COLUMN C Total for * (date after general election) through * (last day of reporting period) (* See page 5 for dates)
-------------------------------	---	---

(d) The Candidate

0.00	0.00	0.00
------	------	------

(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c) and (d))

0.00	18062.81	0.00
------	----------	------

## 12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

0.00	0.00	0.00
------	------	------

## 13. LOANS:

(a) Made or Guaranteed by the Candidate

0.00	54114.10	0.00
------	----------	------

(b) All Other Loans

0.00	0.00	0.00
------	------	------

(c) TOTAL LOANS (add Lines 13(a) and (b))

0.00	54114.10	0.00
------	----------	------

## 14. OFFSETS TO OPERATING EXPENDITURES (Refunds, rebates, etc.)

0.00	0.00	0.00
------	------	------

## 15. OTHER RECEIPTS (Dividends, Interest, etc.)

0.00	0.00	0.00
------	------	------

## 16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)

0.00	72176.91	0.00
------	----------	------

## POST-ELECTION DETAILED SUMMARY PAGE

Report of Receipts and Disbursements

FEC Form 3 (Revised 1/01)

PAGE 5 / 21

Write or Type Committee Name

TOM SPECIALE FOR VIRGINIA

Report Covering the Period:

From:

M M M  
06D D D  
04Y Y Y Y Y  
2020

To:

M M M  
06D D D  
30Y Y Y Y  
2020

## II. DISBURSEMENTS

COLUMN A  
Total this PeriodCOLUMN B  
Election Cycle Total as of \*  
(date of general election)  
(\* See page 5 for date)COLUMN C  
Total for \* (date after general election)  
through \* (last day of reporting period)  
(\* See page 5 for dates)

## 17. OPERATING EXPENDITURES

3149.00

53962.00

99.00

## 18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES

0.00

0.00

0.00

## 19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed by the Candidate

0.00

0.00

0.00

(b) Of All Other Loans

0.00

0.00

0.00

(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and 19(b))

0.00

0.00

0.00

## 20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

0.00

0.00

0.00

(b) Political Party Committees

0.00

0.00

0.00

## POST-ELECTION DETAILED SUMMARY PAGE

Report of Receipts and Disbursements

FEC Form 3 (Revised 1/01)

PAGE 6 / 21

COLUMN A Total this Period	COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date)	COLUMN C Total for * (date after general election) through * (last day of reporting period) (* See page 5 for dates)
-------------------------------	---	---

(c) Other Political Committees (such as PACs)

0.00	0.00	0.00
------	------	------

(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b) and (c))

0.00	0.00	0.00
------	------	------

## 21. OTHER DISBURSEMENTS

0.00	0.00	0.00
------	------	------

## 22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d) and 21)

3149.00	53962.00	99.00
---------	----------	-------

## III. NET CONTRIBUTIONS (OTHER THAN LOANS)

(Note: Substitute in lieu of Line #6 of Summary Page for this report only; subtract Line 20(d) from Line 11(e))

0.00	18062.81	0.00
------	----------	------

## IV. NET OPERATING EXPENDITURES

(Note: Substitute in lieu of Line #7 of Summary Page for this report only; subtract Line 14 from Line 17)

3149.00	53962.00	99.00
---------	----------	-------

## V. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....
24. TOTAL RECEIPTS THIS PERIOD (from Line 16).....
25. SUBTOTAL (add Line 23 and Line 24).....
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25)

21264.91
0.00
21264.91
3149.00
18115.91

FEC  
FORM 3REPORT OF RECEIPTS  
AND DISBURSEMENTS  
For An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full) **TYPE OR PRINT ▼**Example: If typing, type  
over the lines.

12FE4M5

TOM SPECIALE FOR VIRGINIA

ADDRESS (number and street)

4196 MERCHANTS PLAZA

SUITE 434

WOODBRIDGE

VA

22192

▼  
 Check if different  
than previously  
reported. (ACC)

CITY ▲

STATE ▲

ZIP CODE ▲

2. FEC IDENTIFICATION NUMBER ▼

C C00710608

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)

STATE ▼ DISTRICT

VA

00

## 4. TYPE OF REPORT (Choose One)

## (a) Quarterly Reports:

- April 15 Quarterly Report (Q1)  
 July 15 Quarterly Report (Q2)  
 October 15 Quarterly Report (Q3)  
 January 31 Year-End Report (YE)  
 Termination Report (TER)

## (b) 12-Day PRE-Election Report for the:

- Primary (12P)  General (12G)  Runoff (12R)  
 Convention (12C)  Special (12S)

Election on

M M / D D / Y Y Y Y

in the  
State of

## (c) 30-Day POST-Election Report for the:

- General (30G)  Runoff (30R)  Special (30S)

Election on

M M / D D / Y Y Y Y

in the  
State of

5. Covering Period

M M / D D / Y Y  
07 / 01 / 2020

through

M M / D D / Y Y  
09 / 30 / 2020

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Allard, Carl, Edward, ,

Type or Print Name of Treasurer

Allard, Carl, Edward, ,

Signature of Treasurer

[Electronically Filed]

Date

M M / D D / Y Y  
01 / 29 / 2021

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.

Office  
Use  
OnlyFEC FORM 3  
(Revised 05/2016)

Write or Type Committee Name  
TOM SPECIALE FOR VIRGINIA

Report Covering the Period: From:

M M 07 / D D 01 / Y Y 2020

To:

M M 09 / D D 30 / Y Y 2020

6. Net Contributions (other than loans)

- (a) Total Contributions (other than loans) (from Line 11(e)) ....
- (b) Total Contribution Refunds (from Line 20(d)) .....
- (c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)) .....

COLUMN A  
This Period

COLUMN B  
Election Cycle-to-Date

525.00	18062.81
0.00	0.00
525.00	18062.81

7. Net Operating Expenditures

- (a) Total Operating Expenditures (from Line 17) .....
- (b) Total Offsets to Operating Expenditures (from Line 14).....
- (c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)) .....

31.30	53962.00
0.00	0.00
31.30	53962.00

8. Cash on Hand at Close of Reporting Period (from Line 27).....

18609.61
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9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) .....

0.00
------

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) .....

54114.10
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For further information contact:

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

## DETAILED SUMMARY PAGE

of Receipts

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Write or Type Committee Name

TOM SPECIALE FOR VIRGINIA

Report Covering the Period: From:

M M 07 / D D 01 / Y Y Y 2020

To:

M M 09 / D D 30 / Y Y Y 2020

## I. RECEIPTS

COLUMN A  
Total This PeriodCOLUMN B  
Election Cycle-to-Date

## 11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than

Political Committees

(i) Itemized (use Schedule A) .....

0.00

10150.00

(ii) Unitemized .....

25.00

7912.81

(iii) TOTAL of contributions  
from individuals .....

25.00

18062.81

(b) Political Party Committees.....

0.00

0.00

(c) Other Political Committees

0.00

0.00

(such as PACs) .....

500.00

0.00

(d) The Candidate.....

525.00

18062.81

(e) TOTAL CONTRIBUTIONS

(other than loans)

(add Lines 11(a)(iii), (b), (c), and (d))..

12. TRANSFERS FROM OTHER  
AUTHORIZED COMMITTEES .....

0.00

0.00

## 13. LOANS:

(a) Made or Guaranteed by the  
Candidate.....

0.00

54114.10

(b) All Other Loans.....

0.00

0.00

(c) TOTAL LOANS

(add Lines 13(a) and (b)).....

0.00

54114.10

14. OFFSETS TO OPERATING  
EXPENDITURES  
(Refunds, Rebates, etc.) .....

0.00

0.00

15. OTHER RECEIPTS  
(Dividends, Interest, etc.) .....

0.00

0.00

16. TOTAL RECEIPTS (add Lines  
11(e), 12, 13(c), 14, and 15)  
(Carry Total to Line 24, page 4).....

525.00

72176.91

## DETAILED SUMMARY PAGE

of Disbursements

PAGE 4 / 19

FEC Form 3 (Revised 05/2016)

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
17. OPERATING EXPENDITURES.....	31.30	53962.00
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....	0.00	0.00
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate.....	0.00	0.00
(b) Of All Other Loans .....	0.00	0.00
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)).....	0.00	0.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees .....	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs) .....	0.00	0.00
(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c)).....	0.00	0.00
21. OTHER DISBURSEMENTS .....	0.00	0.00
<b>22. TOTAL DISBURSEMENTS</b> (add Lines 17, 18, 19(c), 20(d), and 21) ►	<b>31.30</b>	<b>53962.00</b>

## III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....	18115.91
24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3).....	525.00
25. SUBTOTAL (add Line 23 and Line 24).....	18640.91
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....	31.30
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25).....	18609.61



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 16, 2021

Carl Allard, in his official capacity as Treasurer  
For Virginia  
4196 Merchants Plaza  
Suite 434  
Woodbridge, VA 22192

C00710608  
AF#: 3878 and AF# 3941

Dear Mr. Allard:

On January 8, 2021, the Federal Election Commission (“Commission”) found reason to believe (“RTB”) that For Virginia and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 July and October Quarterly Reports. The Commission also made a preliminary determination that the civil money penalties were \$1,252 and \$1,947, respectively, based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess reduced civil money penalties. A copy of the Reviewing Officer’s recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Please note, the agency's offices remain closed to visitors and most of its employees will continue to telework in an effort to limit the spread of coronavirus (COVID-19). The Commission is processing some documents submitted by mail, though processing will not occur on a daily basis until the agency resumes normal mail operations. Nevertheless, if you choose to submit a response to the recommendation, it must be received on time. Thus, all written responses and supporting documentation should be converted to PDF (Portable Document Format) and must be emailed to the Commission Secretary at [secretary@fec.gov](mailto:secretary@fec.gov). The Commission encourages the use of electronic signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted responses will be deemed received on the date it is electronically received by staff. Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer’s recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1158 if you have any questions.

Sincerely,

*Rhiannon Magruder*

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review

**RECEIVED***By Office of the Commission Secretary at 11:06 am, May 25, 2021*

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

May 25, 2021

**MEMORANDUM**

To: The Commission

Through: Alec Palmer *AP*  
Staff DirectorFrom: Patricia C. Orrock *PCO*  
Chief Compliance OfficerRhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3878 and AF# 3941 – For Virginia and Carl Allard, in his official capacity as Treasurer (C00710608)

On January 8, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 July Quarterly Report (AF# 3878) and 2020 October Quarterly Report (AF# 3941) and made a preliminary determination that the civil money penalties were \$1,252 and \$1,947, respectively. On February 17, 2021, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated April 16, 2021 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) in AF# 3878 and AF# 3941, and assess penalties of \$347 (reduced from the RTB civil money penalty of \$1,252) and \$556 (reduced from the RTB civil money penalty of \$1,947), respectively.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). The respondents have since indicated they will not be submitting a response to the ROR.

**OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 3878 involving For Virginia and Carl Allard, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3878 that For Virginia and Carl Allard, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$347 civil money penalty (reduced from the RTB civil money penalty of \$1,252);
3. Adopt the Reviewing Officer recommendation for AF# 3941 involving For Virginia and Carl Allard, in his official capacity as Treasurer, in making the final determination;
4. Make a final determination in AF# 3941 that For Virginia and Carl Allard, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$556 civil money penalty (reduced from the RTB civil money penalty of \$1,947); and
5. Send the appropriate letters.

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) AFs 3878 and 3941  
Final Determination Recommendation: )  
For Virginia and Carl Allard, in his )  
official capacity as Treasurer )  
(C00710608) )

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 08, 2021, the Commission decided by a vote of 6-0 to take the following actions in AFs 3878 and 3941:

1. Adopt the Reviewing Officer recommendation for AF# 3878 involving For Virginia and Carl Allard, in his official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 3878 that For Virginia and Carl Allard, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$347 civil money penalty (reduced from the RTB civil money penalty of \$1,252).
3. Adopt the Reviewing Officer recommendation for AF# 3941 involving For Virginia and Carl Allard, in his official capacity as Treasurer, in making the final determination.
4. Make a final determination in AF# 3941 that For Virginia and Carl Allard, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$556 civil money penalty (reduced from the RTB civil money penalty of \$1,947).
5. Send the appropriate letters.

Federal Election Commission  
AFs 3878 and 3941  
June 08, 2021

Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and  
Weintraub voted affirmatively for the decision.



Attest:

**Laura  
Sinram**



Digitally signed by Laura Sinram  
Date: 2021.06.08 15:21:58 -04'00'

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Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 11, 2021

Carl Allard, in official capacity as Treasurer  
For Virginia  
4196 Merchants Plaza  
Suite 434  
Woodbridge, VA 22192

C00710608  
AF# 3878

Dear Mr. Allard:

On January 8, 2021, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that For Virginia and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2020 July Quarterly Report. By letter dated February 5, 2021, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$1,252 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On February 17, 2021, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission’s RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission reduce the RTB civil money penalty because it was calculated using an estimated level of activity, make a final determination that For Virginia and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the actual level of activity disclosed on the 2020 July Quarterly Report filed January 29, 2021 (\$3,149), assess a civil money penalty in the amount of \$347 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on April 17, 2021.

On June 8, 2021, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that For Virginia and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the level of activity disclosed on the 2020 July Quarterly Report (\$3,149), assessed a civil money penalty in the amount of \$347 (reduced from the RTB civil money penalty of \$1,252). It is based on the same factors used to calculate the civil money penalty at RTB except that the actual rather than the estimated level of activity was used. A copy of the Final Determination Recommendation is attached.

At this juncture, the following courses of action are available to you:

**1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

**2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the civil money penalty, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

## 5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Shana M. Broussard  
Chair

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**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at final determination is \$347 for the 2020 July Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](http://www.fec.gov/af/pay.shtml) to be directed to Pay.gov's Administrative Fine Program Payment form. Please use the details below to complete the required fields. For additional payment options, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

COMMITTEE NAME: For Virginia

FEC ID#: C00710608

AF#: 3878

PAYMENT AMOUNT DUE: \$347