

STATE OF COLORADO  
SECRETARY OF STATE  
1700 BROADWAY #550  
DENVER, COLORADO 80290

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BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE,  
ADMINISTRATIVE HEARING OFFICER

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AHO Case No. \_\_\_\_\_

ED Case No. 2024-91

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In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

GRAND COUNTY REPUBLICANS,

Respondent.

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### **COMPLAINT**

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Pursuant to § 1-45-111.7, C.R.S. (2024), the Elections Division of the Secretary of State files this complaint against the Grand County Republicans (the “Committee” or “Respondent”).

### **BACKGROUND**

1. Under Colorado law, political party committees are prohibited from accepting cash contributions of greater than \$100. Colorado law also prohibits political party committees from accepting contributions from corporations. Finally, political parties must collect and report the name and address of any person contributing more than \$20, and the occupation and employer for any person contributing more than \$100.

2. Here, the Committee accepted six separate cash contributions totaling \$950, and three corporate contributions totaling more than \$1,400. The Committee also failed to report required address, occupation, or employer information for 21 separate donations.

3. Accordingly, the Elections Division brings this action for appropriate relief.

### **PARTIES**

4. Complainant is the Elections Division (“Division”) of the Colorado Secretary of State.
5. Respondent is the Grand County Republicans, a political party committee registered with the Colorado Secretary of State, ID # 20065643489.

### **JURISDICTION AND VENUE**

6. The Division has jurisdiction under § 1-45-111.7.
7. The Division files this complaint with a hearing officer consistent with § 1-45-111.7(5)(a)(IV).
8. This complaint is timely filed within thirty days of Division’s April 4, 2025, Notice of Investigation, according to § 1-45-111.7(5)(a)(IV).
9. Venue is proper before the hearing officer under § 1-45-111.7(5).

### **ALLEGATIONS**

10. Grand County Republicans is the Republican political party committee for Grand County. Its purpose is “to support Grand County Republicans.”
11. On October 22, 2024, the Division filed a campaign finance complaint and notice of opportunity to cure against the Committee pursuant to its authority under section 1-45-111.7(7), C.R.S. (2024). The complaint alleged that the Committee had accepted cash contributions over \$100, unlawfully accepted corporate contributions, and failed to collect and report address or occupation and employer information for several individual donors.
12. Specifically, the Division identified:
  - a. Six cash contributions in excess of \$100;
  - b. Three contributions from corporations; and

- c. Twenty-one contributions where the address was not listed for a contributor who gave more than \$20, or where the occupation and employer was not listed for a contributor who gave more than \$100.

13. The Committee quickly worked to cure the alleged violations. As to the excess cash contributions, the Committee issued refund checks to each of those contributors, refunding the amount in excess of \$100 to each.

14. As to the corporate contributions, the Committee reimbursed two of the contributions, and explained that the third was a “pass-through payment of table reservations for a Grand County GOP luncheon.” That pass-through payment was ultimately “reversed and replaced with [] individual reservations.” The Committee did identify one corporation who contributed \$400 through this process, and reimbursed that corporation. The Committee did also identify another \$500 contribution for which “appropriate information from the donor was unavailable and untraceable.” For the latter, the Committee donated the \$500 worth of funds to an IRS-approved non-profit.

15. For the donors without addresses, the Committee updated their reports to reflect addresses, and donated one \$45 contribution to an IRS-approved non-profit after it was unable to find an address for the donor.

16. Finally, the Committee added occupation and employer information for all of its individual donors contributing over \$100.

17. The Committee did all of this within the deadline to cure the violations identified in the Division’s complaint.

18. However, some of the prohibited contributions, which the Committee reimbursed, were made in early-2024. Meaning the Committee enjoyed use of those contributions throughout the 2024 election cycle.

19. In addition to its cure efforts, the Committee cooperated with the Division’s investigation.

## **COLORADO CAMPAIGN FINANCE LAW**

20. Under Colorado law, political party committees are prohibited from accepting contribution “in currency or coin exceeding one hundred dollars.” Colo. Const. art. XXVIII, § 3(10).

21. Colorado law also prohibits corporations from contributing to political party committees. Colo. Const. art. XXVIII, § 3(4)(a).

22. Additionally, “all political parties shall report to the appropriate officer their contributions received, including the name and address of each person who has contributed twenty dollars or more.” § 1-45-108(1)(a)(I), C.R.S. (2024).

23. For contributions of one hundred dollars or more, such reports “shall also include the occupation and employer of each person” making such a contribution. § 1-45-108(1)(a)(II), C.R.S. (2024).

### **CLAIM ONE ACCEPTING PROHIBITED CASH CONTRIBUTIONS ( Colo. Const. art. XXVIII, § 3(10))**

24. All preceding allegations are incorporated.

25. During the 2024 election cycle, the Committee accepted six cash contributions in excess of one hundred dollars.

26. Although the Committee ultimately reimbursed or donated the prohibited contributions, it enjoyed use of those contributions for several months during the 2024 election cycle.

27. The Division is entitled to relief under Article XXVIII of the Colorado Constitution and the Fair Campaign Practices Act, § 1-45-101 et seq.

### **CLAIM TWO ACCEPTING PROHIBITED CONTRIBUTIONS ( Colo. Const. art. XXVIII, § 3(4)(a))**

28. All preceding allegations are incorporated.

29. During the 2024 election cycle, the Committee accepted three prohibited contributions from corporations. The total amount of these contributions was \$1,400.

30. Although the Committee ultimately reimbursed or donated the prohibited contributions, it enjoyed use of those contributions for several months during the 2024 election cycle.

31. The Division is entitled to relief under Article XXVIII of the Colorado Constitution and the Fair Campaign Practices Act, § 1-45-101 et seq.

**CLAIM THREE**  
**FAILURE TO REPORT DONOR INFORMATION**  
**(§ 1-45-108(1)(A)(I), (II))**

32. All preceding allegations are incorporated.

33. During the 2024 election cycle, the Committee failed to originally report the address and/or occupation and employer for the donors of twenty-one separate contributions.

34. Although the Committee updated its reports to reflect the required information, it did not do so until the very end of the 2024 election cycle.

35. The Division is entitled to relief under Article XXVIII of the Colorado Constitution and the Fair Campaign Practices Act, § 1-45-101 et seq.

**PRAYER FOR RELIEF**

WHEREFORE, the Elections Division prays for judgment and relief as follows:

1. Penalties as set out under 8 CCR 1505-6, Rule 23.4.3.
2. Such other relief as the Hearing Officer may deem appropriate.

Respectfully submitted this 5<sup>th</sup> day of May, 2025

PHILIP J. WEISER  
Attorney General

/s/ Peter G. Baumann

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## **CERTIFICATE OF SERVICE**

This is to certify that I will cause the foregoing to be served this 5<sup>th</sup> day of May, 2025, by email and/or U.S. mail, addressed as follows:

Grand County Republicans  
C/O Registered Agent Michael Lambert  
PO Box 383  
Granby, CO 80446  
Chairman@grandcountygop.org  
*Respondent*

/s/ Peter G. Baumann