

STATE OF COLORADO SECRETARY OF STATE ADMINISTRATIVE HEARING OFFICER 1700 Broadway #550 Denver, CO 80290	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE, in re ED 2022-109, 2022- 110, 2022-111, 2022-112, 2022-115, 2022-116, and 2022-117 ELECTIONS DIVISION OF THE SECRETARY OF STATE, Complainant, vs. COLIN LARSON; COLIN FOR COLORADO; RESTORE COLORADO LEADERSHIP FUND IEC, RESTORE COLORADO LEADERSHIP FUND 527; DANIEL COLE, COLE COMMUNICATIONS, LLC; and VICTOR’S CANVASSING, LLC. Respondents.	
Attorney for Respondents: Suzanne M. Taheri, #23411 WEST GROUP LAW & POLICY 6501 E. Belleview Ave, Suite 375 Englewood, CO 80111 Phone Number: (303) 263-0844 Email: st@westglp.com	<p style="text-align: center;">REPLY IN SUPPORT OF MOTION TO DISMISS</p>

The Colorado Constitution established an enforcement system that requires timely adjudication of campaign finance complaints. Colo. Const. Art. XXVIII, Section 9. This is necessary to protect candidates from prolonged proceedings that result from politically motivated

attacks. The Division seeks to set aside any such protection for candidates, not through legislation, rule or policy but by mere arbitrary inaction.

Here, Respondent Larson and Larson for Colorado specifically represented to the Division that they were not seeking to cure. In doing so, the candidate shut the door on the possibility of cure. The Division requires cures be filed on Department forms within a specific time. No form was filed and no amendment to the filing was made and the Respondent. Yet, the Division arbitrarily, for its own convenience, without good cause extended the deadline.

This forces Respondent Larson and Larson for Colorado to keep his account open and continue reporting even though he is no longer a candidate and no longer raising money.

Wherefore, Respondents request this matter be dismissed.

Dated: June 12, 2023

/s/ Suzanne Taheri
Suzanne Taheri
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CERTIFICATE OF SERVICE

I hereby certify that on this 12 day of June 2023, a true and correct copy of the **Motion to Dismiss** was served via email to peter.baumann@coag.gov.

/s/ Suzanne Taheri

Suzanne Taheri

Duly signed original on file at West Group