

STATE OF COLORADO ADMINISTRATIVE HEARING OFFICER 1700 Broadway #550 Denver, CO 80290	
BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE, <i>in re</i> ED 2022-105	
ELECTIONS DIVISION OF THE SECRETARY OF STATE,	▲ COURT USE ONLY ▲
Complainant,	CASE NUMBER
vs.	2023-_____
COLORADO DAWN IEC	
Respondent.	
<b>MOTION TO STAY</b>	

Alongside this Motion, the Elections Division of the Secretary of State is filing a complaint against Colorado Dawn IEC. The parties have reached agreement on the terms of a settlement agreement to resolve the allegations in the Division’s Complaint. The parties are in the process of finalizing that agreement, and submitting it to the Deputy Secretary of State for final agency approval.

Because the parties anticipate that the settlement agreement will resolve this matter in full, the Division respectfully requests that the Hearing Officer stay proceedings in this matter pending finalization of the settlement agreement. Once the agreement is approved, the Division will move to dismiss this proceeding. If the parties are unable to finalize their agreement, the Division will move to lift the stay.

Respectfully submitted this 8th day of September, 2023.

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 within filing to be served by email this 8th day of September, 2023, addressed as follows:

Colorado Dawn IEC  
C/O Registered Agent Katie Kennedy  
100 East St. Vrain, Suite 105  
Colorado Springs, CO 80903  
katie@strategiccompliancellc.com  
*Respondent*

*/s/ Peter G. Baumann*