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| <p>STATE OF COLORADO SECRETARY OF STATE ADMINISTRATIVE HEARING OFFICER 1700 Broadway #550 Denver, CO 80290</p> <hr/> <p>BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE, <i>in re</i> ED 2023-13, 2023-14</p> <p>ELECTIONS DIVISION OF THE SECRETARY OF STATE,</p> <p>Complainant,</p> <p>vs.</p> <p>DANIAL WALL, THE COMMITTEE TO ELECT DAN, TRACEY FERGERSON, and THE COMMITTEE TO ELECT TRACEY</p> <p>Respondents.</p> | <p>▲ COURT USE ONLY ▲</p> <hr/> <p>CASE NUMBER</p> <p>2023-_____</p> |
| <p>MOTION TO STAY</p> | |

Alongside this Motion, the Elections Division of the Secretary of State is filing a complaint against Danial Wall, the Committee to Elect Dan, Tracey Ferguson, and the Committee to Elect Tracey. 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 proceedings. If the parties are unable to finalize their agreement, the Division will move to lift the stay.

Respectfully submitted this 27th day of November, 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 27th day of November, 2023, addressed as follows:

Danial Wall and the Committee to Elect Dan
7458 Muhly Ct.
Colorado Springs, CO 80915
Danial.Wall@gmail.com

Respondent

Tracey Ferguson and the Committee to Elect Tracey
2174 Velliquette Ln.
Colorado Springs, CO 80951
cherokeemetrotracey@gmail.com

Respondent

/s/ Peter G. Baumann