

<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 2024-50</p> <p>ELECTIONS DIVISION OF THE SECRETARY  OF STATE,</p> <p>Complainant,</p> <p>vs.</p> <p>COALITION FOR RESPONSIBLE EDUCATION  IN RE-2,</p> <p>Respondent.</p>	<p>▲ COURT USE ONLY ▲</p> <hr/> <p>CASE NUMBER</p> <p>2024 AHO _____</p>
<p><b>MOTION TO STAY</b></p>	

Alongside this Motion, the Elections Division of the Secretary of State is filing a complaint against Coalition for Responsible Education in RE-2. The parties have agreed to a settlement in principle, and are submitting that settlement to the Deputy Secretary of State for his 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 20th day of September, 2024.

PHILIP J. WEISER  
Attorney General

*/s/ Peter G. Baumann*

---

PETER G. BAUMANN\*  
Senior Assistant Attorney General,  
No. 51620  
Ralph L. Carr Colorado Judicial Center  
1300 Broadway, 6<sup>th</sup> Floor  
Denver, Colorado 80203  
Telephone: 720-508-6152  
Fax: 720-508-6041  
[peter.baumann@coag.gov](mailto:peter.baumann@coag.gov)  
\*Counsel of Record

CERTIFICATE OF SERVICE

This is to certify that I will cause the within filing to be served by mail and/or email this 20<sup>th</sup> day of September 2024, addressed as follows:

Coalition for Responsible Education in RE-2  
c/o Registered Agent Willow Brotzman  
1710 Grand Ave.  
Silt, CO 81652  
[Coalition4re2@gmail.com](mailto:Coalition4re2@gmail.com)  
*Respondent*

Sherronna Bishop  
3192 Kennedy Ave.  
Grand Junction, CO 81504  
[Sherronna7@gmail.com](mailto:Sherronna7@gmail.com)  
*Third-Party Complainant*

*/s/ Peter G. Baumann*