

| | |
|---|--|
| <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 2024-57</p> <p>ELECTIONS DIVISION OF THE SECRETARY OF STATE,</p> <p>Complainant,</p> <p>vs.</p> <p>CAMPAIGN TO ELECT TODD WATKINS,</p> <p>Respondent.</p> | <p>▲ COURT USE ONLY ▲</p> <hr/> <p>CASE NUMBER</p> <p>2024 AHO _____</p> |
| <p>MOTION TO STAY</p> | |

Alongside this Motion, the Elections Division of the Secretary of State is filing a complaint against the Campaign to Elect Todd Watkins. 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 31st day of October, 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, 6th Floor
Denver, Colorado 80203
Telephone: 720-508-6152
Fax: 720-508-6041
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 8th day of October 2024, addressed as follows:

The Campaign to Elect Todd Watkins
C/O Registered Agent Todd Watkins
Address Redacted by SOS
TMW20202@gmail.com
Respondent

/s/ Peter G. Baumann