

STATE OF COLORADO  
SECRETARY OF STATE  
1700 BROADWAY #550  
DENVER, COLORADO 80290

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BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE,  
ADMINISTRATIVE HEARING OFFICER

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AHO Case No. \_\_\_\_\_

ED Case No. 2024-82

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In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

EL PASO COUNTY REPUBLICAN CENTRAL COMMITTEE,

Respondent.

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### **COMPLAINT**

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Pursuant to § 1-45-111.7, C.R.S. (2024), the Elections Division of the Secretary of State files this complaint against The El Paso County Republican Central Committee (the “Committee” or “Respondent”).

### **BACKGROUND**

1. To provide voters with information about the sources of election-related communications, Colorado law requires political party committees, like the El Paso County Republican Central Committee, to report the contributions they receive.
2. Here, the Committee failed to completely and accurately report its contributions during the 2024 election cycle. Although these errors appear inadvertent, they deprived voters of accurate information concerning the source of the Committee’s funding.
3. Accordingly, the Elections Division brings this action for appropriate relief.

## **PARTIES**

4. Complainant is the Elections Division (“Division”) of the Colorado Secretary of State.

5. Respondent is the El Paso County Republican Central Committee, a political party committee registered with the Colorado Secretary of State, ID # 20085621924.

## **JURISDICTION AND VENUE**

6. The Division has jurisdiction under § 1-45-111.7.

7. The Division files this complaint with a hearing officer consistent with § 1-45-111.7(5)(a)(IV).

8. This complaint is timely filed within thirty days of Division’s February 11, 2025, Notice of Investigation, according to § 1-45-111.7(5)(a)(IV).

9. Venue is proper before the hearing officer under § 1-45-111.7(5).

## **ALLEGATIONS**

10. The El Paso County Republican Central Committee is a political party committee under Colorado law. As such, it is obligated to report to the Secretary of State its contributions received. For contributions of over \$100, the Committee must also report certain information about the donor, including the donor’s occupation and employer. Cash contributions in excess of \$100 are prohibited.

11. Notwithstanding these requirements, the Committee’s June 4, 2024, Report of Contributions and Expenditures contained multiple inaccuracies related to the Committee’s contributions.

- a. First, the Committee reported several donors’ aggregate contributions for the election cycle as one-time contributions. For example, one donor made a \$30 contribution that brought the donor’s aggregate total to \$105. However, the Committee originally reported that as a \$105 contribution.

- b. Second, the committee reported several separate contributions as cash contributions that exceeded \$100, even though those contributions either were not cash contributions or did not exceed \$100.
- c. Third, the Committee inaccurately reported four duplicate transactions, and two contributions that did not occur.
- d. Finally, the Committee did not report six contributions altogether.

12. The effect of these errors was that the Committee reported a total of \$1,490 in contributions that it did not receive, and failed to report a total of \$425 that it did receive.

13. The total amount of contributions affected by the errors was \$2,775.

14. Additionally, the Committee did not report the occupation of 7 contributors (and the employer of one of those contributors).

15. On October 18, 2024, the Division initiated its own Complaint against the Committee under section 1-45-111.7(7).

16. The Committee cooperated with the Division's review and investigation of the Complaint.

17. The Committee also updated its June 4, 2024, Report of Contributions and Expenditures to accurately report its contributions received, including the occupation and employer of any person making a contribution of over \$100.

### **COLORADO CAMPAIGN FINANCE LAW**

18. Under Colorado law, "political parties shall report to the appropriate officer their contributions received." § 1-45-108(1)(a)(I), C.R.S. (2024). "[T]he disclosure required by this section shall also include the occupation and employer of each person who has made a contribution of one hundred dollars or more to such committee or party." § 1-45-108(1)(a)(II).

19. "No . . . political party shall accept a contribution, or make an expenditure, in currency or coin exceeding one hundred dollars." Colo. Const. art. XXVIII, § 3(10).

**CLAIM ONE**  
**FAILURE TO FILE AN ACCURATE REPORT**  
**(§ 1-45-108(1)(A)(I), C.R.S.)**

20. All preceding allegations are incorporated.

21. On June 5, 2024, the El Paso County Republican Central Committee filed its June 4, 2025, Report of Contributions and Expenditures.

22. The report contained several errors regarding contributions, including duplicate entries, inaccurate reflections of donation amounts, and incomplete information about donors.

23. In total, \$2,775 in contributions were not accurately or completely reported.

24. The Division is entitled to relief under Article XXVIII of the Colorado Constitution and the Fair Campaign Practices Act, § 1-45-101 et seq.

**PRAYER FOR RELIEF**

WHEREFORE, the Elections Division prays for judgment and relief as follows:

1. Penalties as set out under 8 CCR 1505-6, Rule 23.4.3.
2. Such other relief as the Hearing Officer may deem appropriate.

Respectfully submitted this 13th day of March, 2025.

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 foregoing to be served this 13th day of March, 2025, by email and/or U.S. mail, addressed as follows:

El Paso County Republican Central Committee  
C/O Registered Agent John Coyle  
5145 Centennial Blvd.  
Colorado Springs, CO 80919  
chiefstaffer@outlook.com  
*Respondent*

/s/ Peter G. Baumann