

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

---

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

---

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

ED Case No. 2024-82

---

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

EL PASO COUNTY REPUBLICAN CENTRAL COMMITTEE,

Respondent.

---

### **MOTION TO STAY**

---

Alongside this Motion, the Elections Division is filing a complaint against the El Paso County Republican Central Committee. 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 proceeding. If the parties are unable to finalize their agreement, the Division will move to lift the stay.

Respectfully submitted this 13th day of March, 2025.

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 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