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. 2025-03

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

VAN WINKLE FOR COLORADO,

Respondent.

MOTION TO STAY

Alongside this Motion, the Elections Division is filing a complaint against the Van Winkle for Colorado candidate 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 18th day of April, 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 18th day of April, 2025, by email and/or U.S. mail, addressed as follows:

Van Winkle for Colorado
C/O Registered Agent Kevin Van Winkle
9457 S. University Blvd. #102
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Respondent

Lloyd Guthrie
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Third-Party Complainant

            /s/ *Peter G. Baumann*