

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. 2024-62, 2024-66, 2024-87

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

ACADEMY SCHOOL DISTRICT 20,

Respondent.

MOTION TO STAY

Alongside this Motion, the Elections Division is filing a complaint Academy School District 20. 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 9th day of May, 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, 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 foregoing to be served this 9th day of May, 2025, by email and/or U.S. mail, addressed as follows:

Academy School District 20
C/O Counsel Tonya Thompson
110 Chapel Hills Dr.
Colorado Springs, CO 80920
tonya.thompson@asd20.org
Respondent

Robert Rogers
5704 Leon Young Dr.
Colorado Springs, CO 80924
primetarget@gmail.com
Third-Party Complainant

Lara Matissek
12765 Pensador Dr.
Colorado Springs, CO 80921
laramatissek@gmail.com

/s/ Kyle Holter