

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. 2025-08

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

COMMITTEE TO ELECT JIM CHAMBERLAIN HUERFANO COUNTY
COMMISSIONER,

Respondent.

COMPLAINT

Pursuant to § 1-45-111.7, C.R.S. (2024), the Elections Division of the Secretary of State files this complaint against the Committee to Elect Jim Chamberlain Huerfano County Commissioner (“Respondent” or the “Committee”).

BACKGROUND

1. To facilitate compliance with reporting and disclosure requirements, Colorado law prohibits candidate committees from accepting individual cash contributions that exceed \$100.
2. Here, the Committee accepted a \$600 cash contribution in September 2024. And although the Committee later returned that contribution, it did not do so until March 28, 2025, nearly five months after the 2024 election.
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 Committee to Elect Jim Chamberlain Huerfano County Commissioner, a candidate committee registered with the Colorado Secretary of State, ID # 20245047130.

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 the Division’s May 15, 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. In 2024, Jim Chamberlain ran for County Commissioner in Huerfano County. The candidate committee formed to support his candidacy was the Committee to Elect Jim Chamberlain Huerfano County Commissioner.

11. On September 27, 2024, the Committee received a \$600 cash contribution. By law, that contribution exceeded the allowable cash contribution limit by \$500.

12. On March 5, 2025, the Division filed a complaint against the Committee under section 1-45-111.7(7). The complaint alleged that the Committee had accepted a cash contribution in excess of the allowable limit.

13. In response to the Division’s complaint, the Committee cooperated with the Division’s review and investigation, and cured the alleged violation by returning the \$600 contribution on March 28, 2025.

COLORADO CAMPAIGN FINANCE LAW

14. Under Colorado law, candidate committees are prohibited from accepting contributions “in currency or coin” exceeding \$100. Colo. Const. art. XXVIII, § 3(10).

CLAIM ONE
ACCEPTING CASH CONTRIBUTION EXCEEDING \$100
(Colo. Const. art. XXVIII, § 3(10))

15. All preceding allegations are incorporated.

16. On September 27, 2024, the Committee accepted a cash contribution in the amount of \$600.

17. This was \$500 greater than the cash contribution Colorado law permits candidate committees to accept.

18. The Committee returned the contribution, but not until after the 2024 election. As a result, the Committee enjoyed use of the contribution during the 2024 election.

19. 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 16th day of June, 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 16th day of June, 2025, by email and/or U.S. mail, addressed as follows:

Committee to Elect Jim Chamberlain Huerfano County Commissioner
C/O Registered Agent Jim Chamberlain
PO Box 353
La Veta, CO 81055
Chamberlainforcommissioner2@gmail.com
Respondent

/s/ Peter G. Baumann