

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 Nos. 2024-113

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

SONYA JAQUEZ LEWIS and, SONYA FOR COLORADO

Respondents.

COMPLAINT

Pursuant to section 1-45-111.7, C.R.S. (2024), the Elections Division of the Secretary of State files this complaint against Sonya Jaquez Lewis and Sonya for Colorado (the “Committee”) (collectively “Respondents”).

BACKGROUND

1. To provide voters with information about the sources and expenditures of campaign funds, Colorado law requires candidates and their committees to timely report all campaign expenditures. Colorado law also prohibits candidates from using money donated to their candidate committee to make a contribution to another candidate committee.

2. Here, Respondents paid various staffers for several campaign-related and official activities but failed to report those expenditures on the Committee’s reports of contributions and expenditures. The Committee also paid a staffer to campaign for another candidate, constituting an improper contribution to the second candidate committee.

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. Respondents are Sonya Jaquez Lewis, a candidate for reelection in Colorado Senate District 17 in 2024, ID # 20195036727 and Sonya for Colorado, a candidate committee registered with the Colorado Secretary of State, ID # 20195037524.

JURISDICTION AND VENUE

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

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

8. This complaint is timely filed within thirty days of Division’s June 25, 2025, Notice of Investigation according to section 1-45-111.7(5)(a)(IV).

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

ALLEGATIONS

10. In 2024, Sonya Jaquez Lewis was an incumbent state senator representing Senate District 17. She also appeared on the November 2024 General Election ballot for Senate District 17. She won reelection in that race.

11. This complaint involves payments made by Jaquez Lewis and her candidate committee to two staffers, which this Complaint refers to as “Staffer 1” and “Staffer 2,” for official and election-related purposes.

12. Last December, following media reports concerning Jaquez Lewis’s use of campaign funds for allegedly personal activities, the Division received a campaign finance complaint against Jaquez Lewis filed by Cory Gaines. The Gaines Complaint alleged that Jaquez Lewis violated Colorado campaign finance law by:

- a. Failing to report expenditures to staffers;

- b. Unlawfully using campaign contributions for personal purposes; and
- c. Unlawfully providing an in-kind contribution to a separate candidate committee.

13. During its review and investigation of the Gaines Complaint, the Division interviewed Jaquez Lewis and former staff members of Jaquez Lewis, and reviewed publicly available documentary evidence as well as documents provided by the parties and witnesses.

14. Based on its investigation, the Division determined that Jaquez Lewis had used funds from her candidate committee in three ways relevant to this complaint:

- a. First, the Committee paid Staffer #1 to campaign for another candidate committee, Vigil for Adams County.
- b. Second, the Committee paid Staffer #1 for time worked preparing Jaquez Lewis's home to host a campaign fundraising event for the Committee and to work at the event.
- c. Third, the Committee paid Staffer #2 a stipend of \$1 per hour to supplement Staffer #2's salary as a legislative aide to Jaquez Lewis in her official capacity.

15. As to the first payment, the Division's investigation uncovered that the Committee had paid Staffer #1 a total of \$1,205 to campaign for Vigil for Adams County.

16. Under Colorado law, candidate committees are prohibited from making any contributions, including in-kind contributions, to other candidate committees. Colo. const. art. XXVIII, § 3(6). The Committee's payment to Staffer #1, to benefit Vigil for Adams County, was a prohibited in-kind contribution to Vigil for Adams County.

17. Respondent contends that this \$1,205 payment to Staffer #1 was intended to be issued by her political committee, Sonya for Dems. Regardless, the Division's investigation revealed that the payment was made by her candidate committee, Sonya for Colorado. Accordingly, the payment constituted an unlawful contribution from Sonya for Colorado to Vigil for Adams County.

18. As for the second payment to Staffer #1, the Division's investigation concluded that the Committee had paid Staffer #1 to prepare Jaquez Lewis's home in advance of a political fundraising event to benefit the Committee and to work at the event. Because the payments were made for campaign purposes, the Division concluded that this was not a case of unlawfully using campaign funds for personal purposes.

19. However, the Committee failed to report these payments to Staffer #1 on its report of contributions and expenditures.

20. Finally, as to the payments made to Staffer #2, the Division's investigation determined that Jaquez Lewis had supplemented Staffer #2's pay for her work as a legislative staffer by paying Staffer #2 an additional \$1 per hour out of the Committee.

21. Because the Committee had unexpended campaign contributions, this was a permissible use of candidate committee funds under section 1-45-106(1)(b)(V), C.R.S.

22. However, again the Committee failed to report these payments to Staffer #2 on three of its reports of contributions and expenditures.

23. During the Division's review and investigation, the Committee attempted to cure the alleged violations by amending its reports of contributions and expenditures. However, because of the delay in these amendments, the Division determined that the Committee had failed to substantially comply with its legal obligations.

COLORADO CAMPAIGN FINANCE LAW

24. Under Colorado law, "no candidate's candidate committee shall . . . make contributions to, another candidate committee." Colo. const. art. XXVIII, § 3(6).

25. Colorado law also requires all candidate committees to "report to the appropriate officer their . . . expenditures made, and obligations entered into by the committee or party." § 1-45-108(1)(a)(I), C.R.S.

CLAIM ONE PROHIBITED CONTRIBUTION (COLO. CONST. ART. XXVIII, § 3(6))

26. All preceding allegations are incorporated.

27. During the 2024 election cycle, Sonya for Colorado paid a staffer \$1,205 to campaign for a second candidate committee, Vigil for Adams County.

28. This constituted an in-kind contribution of \$1,205 to Vigil for Adams County.

29. By law, Sonya for Colorado—a candidate committee—was not permitted to make a contribution to Vigil for Adams County.

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

CLAIM TWO
FAILURE TO REPORT EXPENDITURES
(§ 1-45-108(1)(a)(1), C.R.S.)

31. All preceding allegations are incorporated.

32. During the 2024 election cycle, Sonya for Colorado paid a staffer \$175 to help prepare her home for a fundraising event and to work at the event. Sonya for Colorado did not timely report that expenditure.

33. Also during the 2024 election cycle, Sonya for Colorado made three expenditures to a different staffer to supplement that staffer's legislative pay. Those expenditures were \$160, \$165, and \$280.

34. None of those expenditures were timely reported.

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

Respectfully submitted this 25th day of July, 2025

PHILIP J. WEISER
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/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 25th day of July, 2025, by email and/or U.S. mail, addressed as follows:

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/s/ Peter G. Baumann

Courtesy copy also provided to Respondents' counsel, Martha Tierney at mtierney@TLS.legal