

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. 2024-65

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

MONTROSE COUNTY SCHOOL DISTRICT,

Respondent.

MOTION TO STAY

Alongside this Motion, the Elections Division is filing a complaint against Montrose County School District. 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 12th 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 12th day of May, 2025, by email and/or U.S. mail, addressed as follows:

Montrose County School District
c/o Thomas Matthew Jenkins, Public Information Officer; and
Dr. Carrie Stephenson, Superintendent
930 Colorado Avenue, Montrose, Colorado 81402
Thomas.Jenkins@mcsd.org; CarrieStephenson@mcsd.org
Respondent

George Kerber
2108 County Road 22
Montrose, CO 81403
pixeldebris@gmail.com
Third-Party Complainant

/s/ Peter G. Baumann

With courtesy copy provided by email to Respondent's counsel at:

Darryl Farrington
dfarrington@semplelaw.com

/s/ Peter G. Baumann