STATE OF COLORADO SECRETARY OF STATE 1700 BROADWAY #550 DENVER, COLORADO 80290

MOTION TO STAY
Respondent.
COLORADO VOTERS FIRST,
vs.
Complainant,
ELECTIONS DIVISION OF THE SECRETARY OF STATE,
In the Matter of
ED Case Nos. 2024-51, 2024-54
AHO Case No
ADMINISTRATIVE HEARING OFFICER
BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE,

Alongside this Motion, the Elections Division is filing a complaint against Colorado Voters First. 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 17th day of March, 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, 6<sup>th</sup> 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 17th day of March, 2025, by email and/or U.S. mail, addressed as follows:

Colorado Voters First C/O Counsel Terrance Carroll 1555 S. Havana St., Unit F-309 Denver, CO 80012 TCarroll@shermanhoward.com Respondent

Cindy Louise Harmer 635 S. Alton Way, Apt. 4C Denver, CO 80247 cl.harmer@gmail.com Third-party Complainant

Katrice Traylor 1013 S. Mobile St. Aurora, CO 80017 kattraylor@gmail.com Third-party Complainant

/s/ Peter G. Baumann