

<p>STATE OF COLORADO SECRETARY OF STATE ADMINISTRATIVE HEARING OFFICER 1700 Broadway #550 Denver, CO 80290</p> <hr/> <p>BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE, <i>in re</i> ED 2024-08</p> <p>ELECTIONS DIVISION OF THE SECRETARY OF STATE,</p> <p>Complainant,</p> <p>vs.</p> <p>BOLDLY FORWARD COLORADO,</p> <p>Respondent.</p>	<p>▲ COURT USE ONLY ▲</p> <hr/> <p>CASE NUMBER</p> <p>2024 AHO _____</p>
<p>MOTION TO STAY</p>	

Alongside this Motion, the Elections Division of the Secretary of State is filing a complaint against Boldly Forward Colorado. The parties are engaged in good faith negotiation on the terms of a settlement agreement to resolve the allegations in the Division’s complaint.

Because the parties anticipate that a settlement agreement would 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 these proceedings. If the parties are unable to finalize their agreement, the Division will move to lift the stay.

Respectfully submitted this 10th day of June, 2024.

PHILIP J. WEISER
Attorney General

/s/ Kyle M. Holter

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CERTIFICATE OF SERVICE

This is to certify that I will cause the foregoing to be served this 10th day of June, 2024, by email, addressed as follows:

Boldly Forward Colorado
c/o Mark Grueskin
mark@rklawpc.com

/s/ Carmen Van Pelt