

<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 2024-57</p> <p>ELECTIONS DIVISION OF THE SECRETARY  OF STATE,</p> <p>Complainant,</p> <p>vs.</p> <p>CAMPAIGN TO ELECT TODD WATKINS,</p> <p>Respondent.</p>	<p>▲ COURT USE ONLY ▲</p> <hr/> <p>CASE NUMBER</p> <p>2024 AHO _____</p>
<p><b>COMPLAINT</b></p>	

Pursuant to § 1-45-111.7, C.R.S. (2024), the Elections Division of the Secretary of State files this complaint against the Campaign to Elect Todd Watkins (the “Committee”).

**BACKGROUND**

1. To provide voters with information about the sources of election-related activity, Colorado law requires all candidates to report their contributions and expenditures to the appropriate officer.

2. Here, the Committee received a \$500 contribution in 2022 during Todd Watkins’s campaign for El Paso County Sheriff. The Committee did not report that contribution until 2024, well after the 2022 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 Campaign to Elect Todd Watkins, a candidate committee registered with the Colorado Secretary of State, ID number 20215041736.

## **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 Division’s October 1, 2024, 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. Todd Watkins was a candidate for Sherriff in El Paso County in 2022. The Campaign to Elect Todd Watkins was the candidate committee formed to support Watkins’s candidacy.

11. In July 2022, the Committee received a \$500 contribution from Steve Shannon. The Committee did not originally report that contribution on its report of contributions and expenditures.

12. In August 2024, the Division received a campaign finance complaint from Shannon, alleging that the Committee had failed to report his July 2022 contribution.

13. According to Shannon, he had a conversation with unknown persons in June 2024 that alerted him that others who had contributed to the Committee in 2022 had not received receipts for their contributions as promised. He then checked TRACER, and saw that the Committee had not reported his 2022 contribution.

14. The Division investigated the Shannon complaint, and issued a Notice of Initial Review and Opportunity to Cure. In response, the Committee sought to cure the violation by reporting a \$500 contribution from Steve Shannon on July 24, 2022. It amended its report to show this contribution in August 2024.

## **COLORADO CAMPAIGN FINANCE LAW**

15. Under Colorado law, “all candidate committees . . . shall report to the appropriate officer their contributions received, including the name and address of each person who has contributed twenty dollars or more[.]” § 1-45-108(1)(a)(I), C.R.S. (2024).

### **CLAIM ONE Failure to Report Contribution (1-45-108(1)(a)(I), C.R.S.)**

16. All preceding allegations are incorporated.

17. On or about July 24, 2022, the Committee received a \$500 contribution from Steven Shannon. The Committee did not report that contribution on its next report of contributions and expenditures.

18. The Committee only reported that contribution in August 2024, after a campaign finance complaint was filed regarding the failure to report the contribution.

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 CCCR 1505-1, Rule 23.3.3
2. Such other relief as the Hearing Officer may deem appropriate.

Respectfully submitted this 31st day of October, 2024.

PHILIP J. WEISER  
Attorney General

*/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 30th day of October, 2024, by email and/or U.S. mail, addressed as follows:

The Campaign to Elect Todd Watkins  
C/O Registered Agent Todd Watkins  
Address Redacted by SOS  
TMW20202@gmail.com  
*Respondent*

Steven Marshall Shannon  
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Peyton, CO 80831  
stevenmarshallshannon@gmail.com  
*Third-party Complainant*

/s/ Peter G. Baumann