

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

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BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE,  
ADMINISTRATIVE HEARING OFFICER

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AHO Case No. \_\_\_\_\_

ED Case No. 2024-109

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In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

COMMITTEE TO ELECT JASON GEMMER,

Respondent.

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### **MOTION TO STAY**

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Alongside this Motion, the Elections Division is filing a complaint against the Committee to Elect Jason Gemmer. 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 16th day of April, 2025.

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 16th day of April, 2025, by email and/or U.S. mail, addressed as follows:

Committee to Elect Jason Gemmer  
C/O Registered Agent Rebecca Gemmer  
311 Rock Rd.  
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[becky@jasonforpark.com](mailto:becky@jasonforpark.com)  
*Respondent*

Jack Hansell  
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*Third-Party Complainant*

/s/ Peter G. Baumann