

COLORADO TITLE SETTING BOARD

IN THE MATTER OF THE TITLE AND BALLOT TITLE AND SUBMISSION CLAUSE
FOR INITIATIVE 2021-2022 #102

MOTION FOR REHEARING

On behalf of Steve Ward and Levi Mendyk, registered electors in the State of Colorado, the undersigned counsel, hereby submits this Motion for Rehearing of the Title Board's April 20, 2022, decision.

1. The Board lacked jurisdiction to consider the initiative because Proponents were required to resubmit the Initiative for review and comment.

After review and comment proponents changed the reference to malt beverage and wine retailer (one license) to malt beverage retailer or malt beverage and wine retailer (two licenses) throughout the submission. These changes were substantive and not in response to review and comment.

2. The measure violates the clear title requirement.

Opponents assert that the titles as set violate clear title as they do not describe the central features of the measure including:

- In parity to opponents' own measures, the board should not include effective dates in one measure while omitting them from other measures.
- A description of any operational changes that also apply to fermented malt beverage licenses

Respectfully submitted this 27th day of April, 2022.

s/Suzanne Taheri
Suzanne Taheri
MAVEN LAW GROUP
1600 Broadway, Suite 1600
Denver, CO 80202
Phone: (303) 218-7150