

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

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

AHO Case No. 2025 AHO 12 CPF

ED Case No. 2024-88

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

YARA FOR COLORADO,

Respondent.

MOTION TO STAY

The Elections Division is moving to stay proceedings in this matter. The parties have agreed in principle to an agreement to resolve the allegations in the Division's complaint. They are in the process of finalizing that agreement and submitting it to the Deputy Secretary 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 21st day of July, 2025.

NATALIE HANLON LEH
Chief Deputy Attorney General

/s/ Peter G. Baumann

PETER G. BAUMANN*
Senior Assistant Attorney General, No 51620
Ralph L. Carr Colorado Judicial Center
1300 Broadway, 6th 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 26th day of June, 2025, by email and/or U.S. mail, addressed as follows:

Yara for Colorado
C/O Registered Agent Michael Stolz
1738 Foggy Brook Dr.
Fort Collins, CO 80528
MrStolz@yahoo.com; yaraforco@gmail.com
Respondent

Stephen Yurash
713 Milan Terrace Dr.
Fort Collins, CO 80525
syurash@hotmail.com
Third-Party Complainant

/s/ Peter G. Baumann