STATE OF COLORADO
SECRETARY OF STATE
Administrative Hearing Office
1700 Broadway, Suite 550
Denver, CO 80290

Case number:	2025 AHO 15 CPF (*in re* ED 2025-01)

IN THE MATTER OF:

ELECTIONS DIVISION of the SECRETARY OF STATE

Complainant

v.

DOUGLAS COUNTY VICTORY FUND,

Respondent

ORDER DENYING MOTION TO DISMISS

The Motion to Dismiss, Opposition and Reply concern the legal obligation of Respondent Douglas County Victory Fund (DCVF), a political committee, to register with the Colorado Secretary of State as a committee and to report contributions and expenditures for the benefit of state candidates for public office. DCVF has made reportable expenditures in the form of contributions to the candidate committees of both a federal candidate and seven candidates for Colorado state offices. Douglas County Victory Fund raised money at an event July 2, 2024 which it then disbursed to Lauren Boebert, a federal candidate for the House of Representatives, and seven candidates for Colorado

state and county offices as well as the Douglas County Republican Central Committee. Compl., ¶¶ 11, 18.

Respondent moves to dismiss Count 1 [Failure to Register] and Count 2 [Failure to Report Contributions and Expenditures] of the Complaint. While failing in its Motion to invoke the rule under which it is made, the Motion falls under C.R.C.P. 12(b)(5). DCVF asserts that it has no obligation to register and report campaign contributions and expenditures to the Colorado Secretary of State because it reported them to the Federal Election Commission (FEC). DCVF asserts that Colorado's campaign finance law is preempted by federal law. Having registered DCVF with the FEC and reported its contributions and expenditures, Respondent argues that Colorado cannot require registration and reporting where a political committee has done so with the FEC, and that the first two counts of the complaint must therefore be dismissed.

Standard of Review. Motions to dismiss are looked upon with disfavor and will be granted only if it appears beyond doubt that the plaintiff can prove no set of facts in support of a claim that would entitle the plaintiff to relief. *Warne v. Hall*, 2016 CO 50, ¶ 11, 373 P.3d 588, 592. In reviewing a motion to dismiss, the Hearing Officer must accept all factual allegations as true and view them in the light most favorable to the Complainant. *Denver Post Corp. v. Ritter*, 255 P.3d 1083, 1088 (Colo. 2011). Motions to dismiss are granted only when the plaintiff's factual allegations do not, as a matter of law, support the claim for relief. *Id.*

Pertinent facts alleged in the Complaint.[1] The Douglas County Victory Fund was established in 2024 to support candidates for both federal and state offices. Compl., ¶ 2. It had a major purpose to raise money for and support candidates for state offices. Compl. ¶

[1] The Division's Complaint somewhat scrambled the allegations, which made it difficult to tease out what happened, when and where, and which facts constitute an element of the claims. Many questions were raised by individual paragraphs, as the court looked for allegations that matched the three asserted legal claims. The questions are in **bold** typeface in this footnote.

¶ 2: "In 2024, the Douglas County Victory Fund was established to support candidates for both federal and state offices." **When was it established, what month, where and how? At the SOS Elections Division? At the FEC? There is no entity by that name listed on the SOS business website.**

¶ 6: "Respondent is the Douglas County Victory Fund, a joint fundraising committee previously registered with the Federal Elections Commission." **When was it registered with the FEC? How long has it been in operation? When did it start reporting contributions and expenditures to the FEC? Is "joint" a term of art for a certain type of committee under FECA?**

¶ 13: "The RSVP link [for the Larkspur event July 2, 2024] also included information about the 'Douglas County Republican Victory Fund.'" **What type of entity is the DCRVF? When did it register as a committee with either the FEC or the Elections Division? What facts led the Division to include DCVF as opposed to DCRVF as Respondent in this action?**

¶ 14: "On information and belief, DCVF spent $28,072.61 on the event, which came in the form of three separate in-kind contributions from members of the Ames family. The event raised $28,176.15." **Why are the very specific dollar amounts in this paragraph made "on information and belief?" Where were these dollar amounts reported? This must have been a huge event or lavish, in order for it to cost $28,072.61. And as a fundraiser, it appears from this paragraph that it was a flop since it only raised $103.54 more than was "spent…on the event."**

¶ 16: "Roughly two months after the event, on July 31, 2024, Douglas County Victory Fund—not the 'Douglas County Republican Victory Fund' advertised on the invitations to the event—was registered as a joint fundraising committee with the Federal Elections Commission ("FEC")." **The time stated is not just confusing but incorrect, according to the Opposition to MtD at p. 3. And what is meant by "joint" fundraising committee? Does "joint" at the FEC mean contributions by the fundraising committee are made to several federal candidate committees? Or does "joint" mean that the fundraising committee is raising funds for both federal and state candidates?**

¶ 17: "Through the FEC, DCVF reported receiving $56,922.61 in contributions, and disbursing the same amount in expenditures. [**When was this reported to the FEC?**] It reported receiving 11 separate contributions on July 31, 2024." **During what period of time did it receive and disburse $56,922.61. Was that all reported as having occurred July 31, 2024? Were the disbursements for state or for federal candidates? Did the 11 separate contributions include the three separate contributions from the Ames family that paid for the July 2 Larkspur event mentioned in ¶14?**

¶ 18: FEC Form 1 listed the committees participating in the Lartkspur joint fundraising effort. Those included Lauren Boebert for Congress, the Douglas County Republican Central Committee, and *seven* Colorado candidate committees covering candidates for Colorado state races. **The enumeration of contributions in ¶20 includes only *five* Colorado candidate Committees. What happened to the other two?**

36. On July 2, 2024, a fundraiser was held in Larkspur, Compl., ¶ 11, that raised $28,176.15. Compl., ¶ 14. The money raised at the event was expended or contributed to candidate committees in the following amounts, Compl., ¶ 19:

Recipient	**Amount**	**% of total**
Lauren Boebert for Congress	$3,340.36	12%
Legal & accounting	$6,384.26	23%
Douglas County Republican Central Committee	$15,389.53	55%
5 Colo state candidate committees	$3,062.00	11%
Total:	**$28,176.15**	**100%**

The following five Colorado state candidate committees received $3,062.00 from the fundraiser were, Compl., ¶ 20:

State Candidate Recipient	**Amount**
Brandi Bradley for HD 39	$159.06
Hartsook for House	$159.06
Brauchler for DA	$755.56
George for DougCo	$397.66
Van Winkle for Colorado	$1,590.65
Total	**$3,061.99**

Under Colorado law, any person or group with the major purpose of electing or nominating candidates for office, and which makes contributions or expenditures in excess of $200 to support or oppose a candidate for state office, is a political committee. Colo. Const. art. xxviii, § 2(12)(a). Such committees must register with the Secretary of State and report their contributions and expenditures.

Taken in the light most favorable to the Plaintiff, DCVF is a political committee as thus defined. First, DCVF spent more than $200 to support candidates for state office, Compl., ¶¶ 19-20. Second, contributions to Colorado state candidates, the Douglas

County Republican Central Committee and legal and accounting amounted to 88% of the total amount disbursed, while 12% went to the federal candidate Lauren Boebert. DCVF had the major purpose of supporting or opposing candidates for office. Compl., ¶ 36.

The invitation to the July 2, 2024 event stated that it was "paid for by Douglas County *Republican* Victory Fund and authorized by all participating committees." Compl., ¶ 11. Considering that there were seven Colorado candidate committees who benefited from the fundraiser, Compl., ¶ 18, it is plausible that the group was knowledgeable about the FCPA's requirement that DCVF register with the state of Colorado Elections Division "*before* accepting . . . any contributions," § 1-45-108(3), C.R.S. [Emphasis supplied.] That section required the fundraising entity to register *before* the July 2, 2024 event. But the DCVF *did not* register before the event, and the $28,176.15 raised on July 2 went unreported until DCVF placed it in a federal filing with the Federal Election Commission on Form 1 two months later. Compl., ¶ 16.

The public purposes to reporting and disclosure requirements were discussed at length in *Buckley v. Valeo*, 424 U.S. 1 (1976).

> "First, disclosure provides the electorate with information as to where political campaign money comes from and how it is spent by the candidate in order to aid the voters in evaluating those [*67] who seek federal office. It allows voters to place each candidate in the political spectrum more precisely than is often possible solely on the basis of party labels and campaign speeches. The sources of a candidate's financial support also alert the voter to the interests to which a candidate is most likely to be responsive and thus facilitate predictions of future performance in office."
>
> *Id.*, at 66-67.

These public purposes of timely disclosure were acknowledged even by appellants in *Buckley*[2] who otherwise wanted the entire Federal Election Campaign Act of 1971(FECA) to be declared unconstitutional. And yet for two or three months during the 2024 election season there was no reporting or disclosure at all about the $28,176.15 raised on July 2 by DCVF. Compl., ¶¶ 20-21. A person wanting to know in September who the contributors were to the DCVF that enabled it to give money to state candidate committees would arrive at a dead end, as DCVF did not register with the state Elections Division. The Complaint reveals no clue that would prompt the public to navigate the FEC website to ferret out that information.

Is compliance with Colorado's Fair Campaign Practices Act preempted by the Federal Election Campaign Reporting Act? Respondent argues that both the Federal Election Campaign Act of 1971 and regulations adopted by the Federal Elections Commission remove any obligation for DCVF to either register or report to the state.

> The provisions of this Act, and of rules prescribed under this Act, supersede and preempt any provision of State law *with respect to election to Federal office*. [Emphasis supplied.]
>
> 52 U.S.C.S. § 30143.[3]

In the regulations, the preemption of FECA is further described:

[2] Appellants conceded that "narrowly drawn disclosure requirements are the proper solution to virtually all of the evils Congress sought to remedy [by enactment of the Federal Election Campaign Act of 1974]." Brief for Appellants, 171, Buckley v. Valeo, 424 U.S. at 60.

[3] The language of preemption was first inserted into FECA as § 403 by the 1974 Amendments. Pub. L. 93-443, Title IV, § 403, 88 Stat. 1299 (Oct. 15, 1974). When FECA was reorganized and republished as a stand-alone Act, general provisions were renumbered §§ 451–455 and the preemption clause was codified as 2 U.S.C. § 453 in the 1976 edition of the U.S. Code (Supplement IV, covering the 93rd–94th Congresses' laws through Jan. 3, 1977). In 2014, Congress created Title 52 – Voting and Elections, placed FECA in that Title and the preemption provision was moved from 2 U.S.C. § 453 to 52 U.S.C. § 30143, where it remains today. Courts discussing federal preemption prior to the 2014 codification refer to it as section 453.

> (a) The provisions of the Federal Election Campaign Act of 1971, as amended, and rules and regulations issued thereunder, supersede and preempt any provision of State law *with respect to election to Federal office*. [Emphasis supplied.]
>
> (b) Federal law supersedes State law concerning the —
>
> > (1) Organization and registration of political committees supporting Federal candidates;
> >
> > (2) Disclosure of receipts and expenditures by Federal candidates and political committees; and
> >
> > (3) Limitation on contributions and expenditures regarding Federal candidates and political committees.
>
> 11 C.F.R. § 108.7.

The Complaint in the instant case does not intrude into any of the subjects of the three subparagraphs above. (1) It does not require registration of DCVF concerning its support of Lauren Boebert, a federal candidate for Congress; it seeks registration of DCVF with the Secretary of State because most of the money it raised went to state candidates (which includes the county party). (2) It does not seek the disclosure of receipts and expenditures related to a federal candidate or committee; it seeks disclosure of money related to state candidates to the extent that DCVF operated as a state political committee. (3) The FCPA contains no limits on contributions and expenditures regarding federal candidates and political committees, so there is nothing in the FCPA to preempt.

Respondent nonetheless argues that the language "supersede and preempt," 52 U.S.C. § 30143 and 11 C.F.R. § 108.7, is a complete barrier to any state regulation of DCVF. The case it cites, *Meyer v. Conlon*, 162 F.3d 1264, 1268 (10th Cir.1998) supports the assertion that state law can be preempted by lawful federal agency regulations as well as by statutes. But the import of the holding in *Meyer* is that state law need not yield to federal preemption where the state law is not contrary to the federal regulations. *Meyer v. Conlon*,

162 F.3d 1264, 1270 (10th Cir. 1998). The argument is strengthened where state law is resonant with the purposes of the federal law.

The first federal law requiring the disclosure of persons contributing more than $100 to political campaigns for Congress was enacted in 1910. Act of June 25, 1910, c. 392, 36 Stat. 822; *Buckley v. Valeo*, 424 U.S. 1, 61, 96 S. Ct. 612, 654-55 (1976). The next significant federal legislation affecting contributors to Congressional campaigns was the Federal Election Campaign Act of 1971, amended in 1974, in 1976 after *Buckley* was decided, and in amended again in 1979.[4] The decade of the 1970s was a time of ferment across the United States in reporting and disclosure laws, spurred by the Watergate Scandal that revealed secret campaign money, slush funds, outsized corporate influence and other indicia of corruption in the electoral process.

Part of that ferment, Colorado enacted the Campaign Reform Act in 1974, which included registration and reporting requirements for "all contributions received and all expenditures made by or on behalf of [a] candidate or political committee." § 1-45- 108(1), C.R.S. (1976, 1980 Repl. Vol. 1B). FECA was already requiring disclosure of the sources of contributions to federal candidates, so the Colorado Campaign Reform Act specifically excluded campaigns for President, Vice President, Senate and Congress. § 1-45-103(11), C.R.S. (1976, 1980 Repl. Vol. 1B). In 1996, voters approved a statutory initiative, the Fair Campaign Practices Act (FCPA), that replaced most of the 1974 law with much stricter

[4] The 1979 amendments to FECA were enacted in H.R. 5010 signed by the President January 8, 1980. https://www.congress.gov/bill/96th-congress/house-bill/5010/all-actions (accessed Aug. 24, 2025).

rules, in part to ensure the "full and timely disclosure of campaign contributions." See § 1-45-102, C.R.S. (1997). In 2002, Colorado voters placed the state's campaign finance framework into Colorado's Constitution, declaring that the public interest is "best served by . . . providing for full and timely disclosure of campaign contributions...and strong enforcement of campaign finance requirements." *Colo. Const., Art. xxviii, § 1*.[5]

The federal and state laws requiring political committees to disclose contributions and expenditures are thus consonant and reinforcing as to the public purpose of disclosure. FECA and *Federal* Election Commission regulations require disclosure of contributions made to political committees supporting candidates *for federal offices*, while Colo. Const. Art. xxviii and Colorado's Fair Campaign Practices Act require disclosure of contributions made to political committees supporting candidates *for state offices*.

Respondent acknowledges, Motion at 3, that the Supreme Court has identified three substantial governmental interests justifying these requirements: "(1) providing voters with information; (2) deterring quid pro quo candidate corruption and avoiding its appearance; and (3) facilitating the enforcement of campaign finance law." But then Respondent surprisingly asserts that "precisely none of these interests are supported by requiring Respondent to register with the Secretary and disclose substantially the same

[5] On November 5, 2002, the citizens of Colorado approved a ballot initiative titled "Amendment 27: Campaign Finance." This initiative amended the Colorado Constitution by the addition of a new "Article XXVIII." The vote on Amendment 27 was 890,390 YES; 448,599 NO. Source: https://historicalelectiondata.coloradosos.gov/eng/ballot_questions/view/12950/.

information it is already required to disclose to the FEC." On the contrary, each of those three interests are served by requiring DCVF to report its contributions and expenditures to the Secretary of State. 1) Reporting to the state certainly would have provided information to voters in Colorado, who had and still have no information at all about who contributed money to DCVF that was given to seven state candidates. That information was on the FEC website—not the Secretary of State website that persons interested in Colorado elections would naturally be consulting. 2) Knowledge about donors on the Secretary of State's website does help to avoid quid pro quo corruption and the appearance of corruption by shining a light on who is giving money to candidates and thus alerting the public to favors that may be returned by a candidate who wins an election. In this case, for example, three family members gave virtually all of the $28,072.61 contributions that were taken in at the July 2 event. Compl., ¶14. 3) This case does indeed show how disclosure aids in the enforcement of campaign finance law. For example, the citizen complaint that launched the instant case was filed December 31, 2024. Compl., ¶ 23. Only after the investigation began did Brauchler for DA—a recipient of money from DCVF—return funds in excess of the $450 per cycle limit imposed by the FCPA to the donor DCVF. That occurred on January 17, 2025. Compl. ¶ 46. To summarize, all three purposes of reporting and disclosure that Respondent recognized in its brief, citing *Buckley v. Valeo* and *Citizens United v. Fed. Election Comm'n*, 558 U.S. 310, 344-45 (2010), are advanced by requiring DCVF to register and report contributions and expenditures *related to state candidates and offices* to the Colorado Secretary of State.

Rooted in a similar political and legal tradition that favors disclosure as the best way to avoid corruption or the appearance of corruption and to inform voters of where candidates may be placed on the political spectrum, an analysis of the preemption doctrine is required to see if Colorado's FCPA is preempted by the Federal Election Campaign Act.

Rice v. Santa Fe Elevator Corp., 331 U.S. 218 (1947) is the starting point for a preemption analysis, which put the intent of Congress at its center.

> "[W]e start with the assumption that the historic police powers of the States were not to be superseded by the Federal Act unless that was the clear and manifest purpose of Congress." Rice v. Santa Fe Elevator Corp., 331 U.S. 218, 230, 67 S. Ct. 1146, 1152 (1947).

The scheme of federal regulation in FECA is not "so pervasive as to make reasonable the inference that Congress left no room for the States to supplement it." *Id.* Nor is this "a field in which the federal interest is so dominant that the federal system will be assumed to preclude enforcement of state laws on the same subject." *Id.* Both of these are true, and thus argue against preemption, because FECA requires disclosure only *as to federal offices* and has left the states to legislate disclosure *as to state offices*.

Courts have found preemption where it simply was not possible to comply with both the federal and the state law requirements. *Fla. Lime & Avocado Growers, Inc. v. Paul*, 373 U.S. 132, 142-43, 83 S. Ct. 1210, 1217 (1963) (State law is preempted where compliance with both federal and state regulations is a physical impossibility). *Pac. Gas & Elec. Co. v. State Energy Res. Conservation & Dev. Comm'n*, 461 U.S. 190, 204, 103 S. Ct.

1713, 1722 (1983) (preemption is found where state law "stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress.")

The disclosure of contributions and expenditures sought here is not a case where "state policy may produce a result inconsistent with the objective of the federal statute." *Rice v. Santa Fe Elevator Corp.*, 331 U.S. at 230, 67 S. Ct. at 1152. The policy reasons supporting disclosure and reporting of campaign contributions and expenditures are the same for state offices as they are for federal offices, and they were thoroughly discussed, as noted above, in *Buckley, id.* at 66-67. Compliance of the Douglas County Victory Fund with the disclosure and reporting of federal campaign funds to the FEC and state campaign funds to the Colorado Secretary of State can be readily accomplished without transgressing the purposes or provisions of either campaign finance scheme.

Not a sentence in FECA or its regulations touches reporting and disclosure requirements for state offices. And in Colorado, the FCPA does not touch political committees insofar as they support federal candidates. What Respondent points to as the language of preemption—"The provisions of this Act, and of rules prescribed under this Act, supersede and preempt any provision of State law *with respect to election to Federal office*"—can be read as preempting nothing at all because the FCPA has for fifty years excluded elections to Federal offices from its purview.

A closer look can be taken at the case at the point of Respondent's spear, *Meyer v. Conlon*. Motion, p. 2. That 10th Circuit case states that "preemption occurs [1] when Congress expresses a clear intent to preempt in a federal statute; [2] when there is a

conflict between federal and state law; [3] when compliance with both federal and state law is impossible; [4] when there is an implicit barrier in the federal statute to state regulation; [5] when Congress has comprehensively occupied an entire field and leaves no room for state law; or [6] when state law is an obstacle to the objectives and purpose of Congress." *Id.* at 1268.

Applying these six factors in *Meyer* to the case at hand, it is apparent that [1] No language in FECA provides a safe harbor for a political committee to avoid the FCPA obligation of registration and making state disclosures for money handed to candidates for state office. [2} There is no conflict between federal and state law: one requires reporting federal candidate contributions to the FEC, the other requires reporting state candidate contributions to the Colorado Secretary of State. [3] There is nothing in the Complaint or Motion to Dismiss to suggest that compliance with both FECA and FCPA is difficult, much less impossible. [4] The provisions of FECA do not create any barriers for the state to regulate contributions and expenditures made by political actors for state candidate races. [5] The field occupied by Congress in FECA is federal elections, and FECA is barren of any language impinging on a state's interest in disclosure of money placed in service of state candidates' elections. [6] And finally, the state FCPA focusing only on state candidates and the political committees supporting them is entirely consonant with the purposes of Congress in enacting FECA. The two acts are resonant. Voters can track who is contributing money to federal campaigns by going to the FEC website; they can track contributions to state campaigns by going to the Secretary of State website.

The Division's Opposition to the Motion to Dismiss cites several cases that have interpreted quite narrowly the preemption language on which the Motion is grounded. *Stern v. Gen. Elec. Co.*, 924 F.2d 472, 475 n.3 (2d Cir. 1991)("courts have given section 453 a narrow preemptive effect in light of its legislative history.") *Krikorian v. Ohio Elections Comm'n*, 2010 U.S. Dist. LEXIS 110871, 2010 WL 4117556, at *10 (S.D. Ohio Oct. 19, 2010) ("While at first blush, § 453 appears to have an exceedingly broad scope, courts have not interpreted [it] in that manner.") *Karl Rove & Co. v. Thornburgh*, 39 F.3d 1273, 1280 (5th Cir. 1994)(a "strong presumption" exists against preemption.") *Minn. Chamber of Com. v. Choi*, 707 F. Supp. 3d 846, 866 (D. Minn. 2023) ("Because the FECA only expressly preempts state laws with respect to elections of federal office, and the prohibitions in [the challenged law] are limited to state offices, the provisions are not expressly preempted by the FECA.")

Another case that reads the preemption language of FECA narrowly. In *Reeder v. Kan. City Bd. of Police Comm'rs*, 733 F.2d 543, 545 (8th Cir. 1984), the 8th Circuit held that a state statute forbidding police officers from making contributions to candidates for federal office was not preempted by this language. And in one of the most famous preemption cases of the last generation, the Supreme Court held that warning labels on cigarettes mandated by federal law did not preclude state common law damages actions and stated that the court determines the preemption issue "in light of the presumption against the pre-emption of state police power regulations" in the absence of an expression of congressional intent. *Cipollone v. Liggett Grp.*, 505 U.S. 504, 518, 112 S. Ct. 2608, 2618 (1992).

Adding to this authority on the side of "no preemption here" is the Federal Election Commission's Advisory Opinion 1986-27 appended to the Division's brief. The facts pertaining to fundraising in Alaska by a federally registered political committee that give rise to the Opinion are nearly on all fours with the instant case. The federally registered Alaska political committee raised the money. 80% of the money was diverted to state candidates and purposes. The Alaska Commission through which disclosures are made requires more information about contributors than FECA requires. The Alaska political committee asked the FEC for an Opinion as to whether reporting contributions with respect to state offices is preempted by FECA. ("You ask whether the filing of such a consolidated report covering the receipts and disbursements of both A.L.I.V.E. Voluntary and A.L.I.V.E. Regular as a single committee is permissible under the Act and regulations." Advisory Opinion 1986-27 at p. 2.) The Opinion clearly states that FECA does not preempt state registration and disclosure requirements as to state offices and candidates.

> The Commission has noted that the legislative history evinces the intent of Congress that the Act should occupy the field with respect to Federal campaign funds. See Advisory Opinion 1986-11. *The Act does not, however, preempt state law with respect to the reporting of receipts and disbursements of funds used for non-Federal election purposes or the registration and reporting of non-Federal accounts or state committees*.[Citation omitted. Emphasis supplied.]
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> Advisory Opinion 1986-27 at p. 3.

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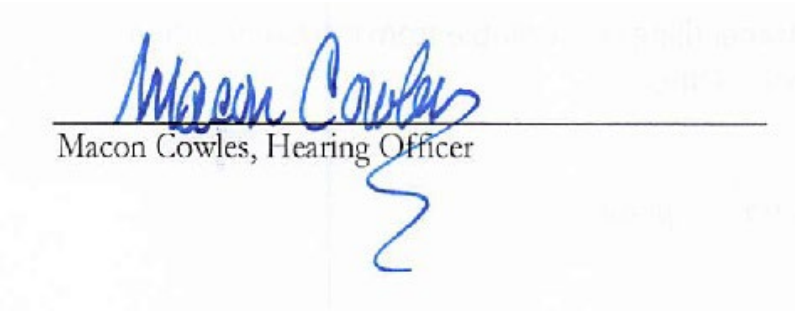
For the reasons stated, the Motion to Dismiss is DENIED. Respondent shall have fourteen days from the date of this Order to file an Answer to the Complaint. C.R.C.P. 12(a)(1).

SO ORDERED this 27th day of August 2025.



CERTIFICATE OF SERVICE

The undersigned hereby certifies that one true copy of this Order Denying Motion to Dismiss was sent via email and / or U.S. Post on August 28, 2025 to the following:

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