

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. _____

ED Case No. 2025-24

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

CHRIS FOR RTD

Respondent.

COMPLAINT

Pursuant to § 1-45-111.7, C.R.S. (2025), the Elections Division of the Secretary of State files this complaint against Chris for RTD (the “Committee” or “Respondent”).

BACKGROUND

1. Under Colorado law, candidates are prohibited from accepting cash contributions in excess of \$100.
2. Here, the Committee erroneously accepted a \$1,000 cash contribution. Although the Committee returned the contribution after receiving notice from the Division, it did not do so until well after the 2024 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 Chris for RTD, a candidate committee registered with the Colorado Secretary of State, ID # 20235046581.

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 August 7, 2025, 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. Chris for RTD is a candidate committee under Colorado law. Its purpose is “to elect Christopher “Chris” Nicholson as RTD Director for District A.”

11. Nicholson appeared on the General Election ballot in November 2024. He won that election.

12. According to Reports of Contributions and Expenditures filed with the Secretary of State, the Committee accepted a cash contribution of \$1,000 on October 25, 2024.

13. The contribution was made by Mohamed Abukar.

14. On June 3, 2025, the Division, filed a complaint against the Committee under section 1-45-111.7(7). The complaint alleged that the Committee had accepted a cash contribution in excess of the limit allowed under Colorado law.

15. The Committee worked quickly to cure the alleged violation. On June 6, 2025, the Committee returned the \$1,000 contribution to Abukar.

16. The Committee also fully cooperated with the Division’s investigation. Nothing in the Division’s investigation suggested an intent to mislead the electorate.

COLORADO CAMPAIGN FINANCE LAW

17. Under Colorado law, candidates and their committees shall not “accept a contribution, or make an expenditure, in currency or coin exceeding one hundred dollars.” Colo. Const. art. XXVIII, § 3(10).

CLAIM ONE RECEIPT OF EXCESS CASH CONTRIBUTION (COLO. CONST. ART. XXVIII, § 3(10))

18. All preceding allegations are incorporated.

19. On October 25, 2024, the Committee accepted a \$1,000 cash contribution.

20. That contribution exceeded the \$100 limit for contributions made in cash.

21. Although the Committee reimbursed the \$1,000 contribution, it was unable to do so until after the 2024 election.

22. 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 CCR 1505-6, Rule 23.4.3.
2. Such other relief as the Hearing Officer may deem appropriate.

Respectfully submitted this 8th day of September, 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 8th day of September, 2025, by email and/or U.S. mail, addressed as follows:

Chris for RTD
C/O Registered Agent Christopher Friendly Nicholson
1550 Larimer St.
Box 784
Denver, CO 80202
chris@chrisforrtd.com
Respondent

/s/ Peter G. Baumann