

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. 2025-10

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

ONE COLORADO PAC

Respondent.

COMPLAINT

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

BACKGROUND

1. Under Colorado law, political committees are prohibited from accepting aggregate contributions from one person in excess of \$725. Political committees are also required to timely report their contributions and expenditures on a schedule established by law.

2. Here, although the Committee reported receiving nine contributions in September 2024, it had actually received a single contribution from One Colorado, a 501(c)(4) non-profit corporation.

3. Moreover, the Committee then used those funds to make 41 separate contributions to Colorado candidate committees in October 2024. However, the Committee

did not report these expenditures on either its October 15 Report of Contributions or Expenditures or its October 28 Report of Contributions and Expenditures.

4. Accordingly, the Elections Division brings this action for appropriate relief.

PARTIES

5. Complainant is the Elections Division (“Division”) of the Colorado Secretary of State.

6. Respondent is One Colorado PAC, a political committee registered with the Colorado Secretary of State, ID # 20105018431.

JURISDICTION AND VENUE

7. The Division has jurisdiction under § 1-45-111.7.

8. The Division files this complaint with a hearing officer consistent with § 1-45-111.7(5)(a)(IV).

9. This complaint is timely filed within thirty days of Division’s August 8, 2025, Notice of Investigation, according to § 1-45-111.7(5)(a)(IV).

10. Venue is proper before the hearing officer under § 1-45-111.7(5).

ALLEGATIONS

11. The Committee is a Political Committee registered with the Colorado Secretary of State.

12. On September 30, 2024, the Committee filed its September 30 Report of Contributions and Expenditures. According to that report, the committee had received nine contributions from individuals on September 17, 2024, ranging from \$300 to the maximum contribution of \$725. The September 30 report did not include the occupation and employer for any of the nine contributors, each of whom had contributed over \$100, and omitted the address for several of the contributors.

13. On March 14, 2025, the Division filed a complaint against the Committee under section 1-45-111.7(7), alleging that the Committee had violated Colorado campaign

finance law by failing to identify the occupation and employer and, in some cases, the address, for its contributors.

14. During the Division's review and investigation of the Complaint, the Committee indicated that the nine contributions were originally made to One Colorado, a 501(c)(4) nonprofit corporation at a June fundraiser.

15. In September, the 501(c)(4) determined that it wanted to contribute to several Colorado candidate committees through its political action committee.

16. Accordingly, it contacted the nine donors in question—none of whom had designated a specific purpose or other limitation on the 501(c)(4)'s use of their contributions—to ask whether the 501(c)(4) could transfer those contributions to One Colorado PAC. Each of the nine contributors gave their permission.

17. At that time using the contributions made to it by the nine contributors, the 501(c)(4) made a single contribution of \$5,225 to One Colorado PAC. Nonetheless, One Colorado PAC reported that contribution as nine separate contributions.

18. Using \$4,025 of that contribution, the Committee made approximately 40 contributions to various Colorado candidate committees on or around October 1, 2025.

19. The Committee did not originally include those expenditures on October 15, 2024, Report of Contributions or Expenditures or its October 28, 2024, Report of Contributions and Expenditures. The Committee ultimately reported these contributions on its December 10, 2024, Report of Contributions and Expenditures, but indicated that each was made on October 28, 2024, instead of in early-October when the contributions were distributed.

20. With the remaining \$1,200 from the 501(c)(4)'s contribution, the Committee made a contribution to the Committee to Elect Deneya Esgar on or about October 22, 2024. The Committee did not include that contribution on its October 28, 2024, Report of Contributions and Expenditures.

21. The Committee to Elect Deneya Esgar did disclose the contribution from One Colorado, including in a Major Contributor Report. To date, One Colorado PAC has not amended its reports to reflect the expenditure made to the Committee to Elect Deneya Esgar.

COLORADO CAMPAIGN FINANCE LAW

22. Under Colorado law, political committees are prohibited from accepting more than \$725 from any person over the course of an election cycle. Colo. Const. art. XXVIII, § 3(5); 8 CCR 1505-6, Rule 10.17.1(f).

23. Political committees must also report to the Secretary “their contributions received, including the name and address of each person who has contributed twenty dollars or more; expenditures made, and obligations entered into by the committee[.]” § 1-45-108(1)(a)(I).

CLAIM ONE RECEIPT OF EXCESS CONTRIBUTION (COLO. CONST. ART. XXVIII, § 3(5))

24. All preceding allegations are incorporated.

25. On October 25, 2024, the Committee accepted a \$5,225 contribution from One Colorado, a 501(c)(4) nonprofit corporation.

26. That contribution exceeded the \$725 limit for contributions from one person to a political committee.

27. The Division is entitled to relief under Article XXVIII of the Colorado Constitution and the Fair Campaign Practices Act, § 1-45-101 et seq.

CLAIM TWO RECEIPT OF EXCESS CONTRIBUTION (COLO. CONST. ART. XXVIII, § 3(5))

28. On or about October 1, 2025, the Committee made approximately 40 expenditures. These expenditures consisted of contributions to various Colorado candidate committees.

29. The Committee did not report these expenditures on its October 15 or October 28 Reports of Contributions and Expenditures. Instead, the Committee reported them on its December 10 Report of Contributions and Expenditures.

30. The Committee also made an expenditure to the Committee to Elect Deneya Esgar on or about October 22, 2024. The Committee did not report that contribution on its October 28 Report of Contributions and Expenditures.

31. 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 10th day of September, 2025.

NATALIE HANLON LEH
Chief Deputy 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 10th day of September, 2025, by email and/or U.S. mail, addressed as follows:

One Colorado PAC
C/O Registered Agent Jax Gonzalez
303 E. 17th Ave.
Suite 400
Denver, CO 80203
jaxg@one-colorado.org
Respondent

/s/ Peter G. Baumann