

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

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

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AHO Case No. \_\_\_\_\_

ED Case No. 2025-10

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In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

ONE COLORADO PAC,

Respondent.

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### **MOTION TO STAY**

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Alongside this Motion, the Elections Division is filing a complaint against One Colorado PAC. The parties have reached an agreement to resolve the allegations in the Division's complaint, and are submitting their agreement to the Deputy Secretary of State 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 10th day of September, 2025.

NATALIE HANLON LEH  
Chief Deputy Attorney General

*/s/ Peter G. Baumann*

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PETER G. BAUMANN\*  
Senior Assistant Attorney General,  
No. 51620  
Ralph L. Carr Colorado Judicial Center  
1300 Broadway, 6<sup>th</sup> Floor  
Denver, Colorado 80203  
Telephone: 720-508-6152  
Fax: 720-508-6041  
[peter.baumann@coag.gov](mailto:peter.baumann@coag.gov)  
\*Counsel of Record

## **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. 17<sup>th</sup> Ave.  
Suite 400  
Denver, CO 80203  
[jaxg@one-colorado.org](mailto:jaxg@one-colorado.org)  
*Respondent*

/s/ Peter G. Baumann