

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. 2025-30

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

COLORADO DEMOCRATIC PARTY,

Respondent.

COMPLAINT

Pursuant to § 1-45-111.7, C.R.S. (2024), the Elections Division of the Secretary of State files this complaint against the Colorado Democratic Party (the “Committee” or “Respondent”).

BACKGROUND

1. Under Colorado law, political party committees are prohibited from accepting contributions from corporations or labor unions.

2. Here, the Committee accepted a \$2,500 contribution from the Colorado AFL-CIO, a labor union. Although the Committee returned the contribution, it did not do so until nearly 10 months after it originally accepted the contribution.

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 Colorado Democratic Party, a political party committee registered with the Colorado Secretary of State, ID # 19991500001.

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 November 6, 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. According to its original April 15, 2025 Report of Contributions and Expenditures, on January 28, 2025, the Committee accepted a \$2,500 contribution from the Colorado AFL-CIO Labor 2k Union. The Committee reported this contribution as coming from a corporation.

11. On July 28, 2025, the Division filed a complaint against the Committee on its own volition under section 1-45-111.7(7). The original complaint alleged that the Committee had accepted a corporate contribution in violation of Colorado law.

12. On August 11, 2025, the Committee filed a Notice of Intent to Cure. In the Notice, the Committee said that the contribution had actually come from a small-donor committee, not a corporation. It also noted that it had amended its reports to reflect this distinction.

13. The Division reviewed the amended April 15, 2025 Report, and saw that the contribution was now said to have come from the American Federation of State, County and Municipal Employees (“AFSCME”) small donor committee.

14. Noting the change in the source of the contribution, the division requested a copy of the check from the Committee.

15. Instead, on October 15, 2025, the Committee told the Division that a further review of its records showed that the contribution had not come from AFSCME or the AFL-CIO's small donor committee but had in fact come from the general treasury of the Colorado AFL-CIO, a labor union.

16. On October 14, 2025, the Committee issued the Colorado AFL-CIO a refund in the amount of \$2,500. The Committee provided a copy of this check to the Division, and updated its April 15, 2025 Report to reflect the reimbursement of those funds.

COLORADO CAMPAIGN FINANCE LAW

17. Under Colorado law, "it is unlawful for a corporation or labor organization to make contributions to a political party." Colo. Const. art. XXVIII, § 3(4)(a).

CLAIM ONE ACCEPTING PROHIBITED CONTRIBUTIONS (Colo. Const. art. XXVIII, § 3(4)(a))

18. All preceding allegations are incorporated.

19. On January 28, 2025, the Colorado Democratic Party accepted a \$2,500 contribution from the Colorado AFL-CIO Labor 2k Union.

20. That contribution came from the union's treasury account, not its small donor committee account.

21. That contribution was prohibited by Colorado law.

22. The Committee did not reimburse that contribution until October 14, 2025.

23. 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 5th day of December, 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 5th day of December, 2025, by email and/or U.S. mail, addressed as follows:

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Respondent

/s/ Peter G. Baumann