

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. 2025-101

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

ESSERMAN FOR DENVER KIDS,

Respondent.

COMPLAINT

Alongside this Motion, the Elections Division is filing a complaint against Esserman for Denver Kids. 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 12th day of December, 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 12th day of December, 2025, by email and/or U.S. mail, addressed as follows:

Esserman for Denver Kids
C/O Registered Agent Rob Baumgarten
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Respondent

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/s/ Peter G. Baumann