

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. 2025-98

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

MESA COUNTY REPUBLICAN WOMEN,

Respondent.

COMPLAINT

Pursuant to § 1-45-111.7, C.R.S. (2025), the Elections Division of the Secretary of State files this complaint against Mesa County Republican Women, Inc. (“Respondent” or the “Committee”).

BACKGROUND

1. To provide voters with information about the sources of election-related communications, Colorado law requires that entities spending a certain amount on electioneering communications or regular biennial school electioneering communications to include in those communications a disclaimer identifying the person who paid for the advertisement. If the person is a non-natural person, like a committee, the disclaimer must also identify the person’s registered agent.

2. Here, the Committee spent \$4,400 on a billboard supporting the election of three candidates for school board during the November 2025 elections in Mesa County. Although the billboard included a “paid for by” disclaimer, the billboard did not identify the Committee’s registered agent.

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 Mesa County Republican Women, Inc. a 527 Political Organization registered with the Colorado Secretary of State, ID # 20255050236.

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 the Division’s November 15, 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. Andrea Haitz, Angela Lema, and Will Jones ran for school board director in Mesa County in 2025. Each of those candidates appeared on the November 2025 ballot in Mesa County.

11. In the leadup to the November 2025 election for school board in Mesa County, the Committee paid for a billboard encouraging voters to “Re-Elect Lema, Haitz, Jones” to the D51 School Board.

12. According to the Committee, the billboard was displayed to voters in Mesa County between October 7, 2025, and November 7, 2025.

13. According to the Committee, it spent \$4,400 on the billboard.

14. On October 30, 2025, the Division received a campaign finance complaint filed against “Carla Alley c/o Mesa County Republican Women.” The complaint was filed by Shannon Pitton. The Pitton complaint alleged that the Committee was “using [the] Mesa County Valley School District #51 official logo” in its billboard.

15. The Pitton complaint included a photograph of the billboard.



16. The Division conducted a review and investigation of the Pitton complaint.

17. First, the Division determined that the improper use of a district logo is not a campaign finance matter and thus is not under the jurisdiction or authority of the Secretary or Division.

18. However, the Division noted that the “paid for by” disclaimer on the billboard did not identify the Committee’s registered agent.

19. During its investigation, the Division corresponded with the Committee, which confirmed that more than \$1,000 was spent on the billboard.

20. The Division also reviewed the Committee’s reports of contributions and expenditures. The Committee reported making a \$4,400 expenditure to “GJ Billboards” on October 9, 2025.

COLORADO CAMPAIGN FINANCE LAW

21. “Any person who expends one thousand dollars or more per calendar year on electioneering communications or regular biennial school electioneering communications shall, in accordance with the requirements specified in section 1-45-107.5(5), state in the communication the name of the person making the communication.” § 1-45-108.3(3), C.R.S. (2025).

22. Under 107.5(5), that statement must (I) say that “The communication has been ‘paid for by (full name of the person paying for the communication’; and (II) identif[y] a natural person who is the registered agent if the person identified in subsection (5)(a)(I) of this section is not a natural person.” § 1-45-107.5(5)(a).

23. An electioneering communication is “any communication . . . printed . . . on a billboard, . . . that: (I) unambiguously refers to any candidate; and (II) is . . . distributed within thirty days before a primary election or sixty days before a general election; and (III) is . . . distributed to an audience that includes members of the electorate for such public office.” Colo. Const. art. XXVIII, § 2(7)(a).

24. A “regular biennial school electioneering communication” is an electioneering communication that refers to a candidate in a regular biennial school election and is broadcast, printed, mailed, delivered, or distributed within sixty days before a regular biennial school election. § 1-45-103(15.5).

CLAIM ONE FAILURE TO INCLUDE COMPLIANT DISCLAIMER (§ 1-45-108.3(3), C.R.S.)

25. All preceding allegations are incorporated.

26. In 2025, the Committee spent \$4,400 on a billboard supporting the election of three candidates for school board director in Mesa County.

27. The billboard unambiguously identified those three candidates, was broadcast to members of the electorate for the election to school board in Mesa County, and were distributed within 60 days of the November 2025 election to that office.

28. Although the billboard included a “paid for by” disclaimer, the disclaimer did not identify the Committee’s registered agent.

29. 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 15th day of December, 2025

PHILIP J. WEISER
Attorney General

/s/ Peter G. Baumann

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

CERTIFICATE OF SERVICE

This is to certify that I will cause the foregoing to be served this 15th day of December, 2025, by email and/or U.S. mail, addressed as follows:

Mesa County Republican Women, Inc.
C/O Registered Agent Sue Benjamin
C/O President Carla Alley
PO Box 427
Grand Junction, CO 81502
benacres@bresnan.net; TessAlley16@gmail.com
Respondent

Shannon Pitton
367 Plateau Dr.
Grand Junction, CO 81507
Shannon.Pitton@gmail.com
Third-Party Complainant

/s/ Peter G. Baumann