

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. 2025-33

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

WEINBERG FOR COLORADO, and RON WEINBERG

Respondents.

COMPLAINT

Pursuant to § 1-45-111.7, C.R.S. (2025), the Elections Division of the Secretary of State files this complaint against Weinberg for Colorado (the “Committee”) and Ron Weinberg (collectively, “Respondents”).

BACKGROUND

1. When a Colorado candidate committee raises funds from supporters, those funds can only be spent—with limited exceptions—for campaign purposes. Under no circumstances can they be spent on personal expenses that are not reasonably related to supporting the candidate’s election.

2. Here, Representative Ron Weinberg’s candidate committee spent thousands of dollars on expenditures that were not reasonably related to his election, including nearly \$2,000 to an Israeli football club, and thousands of dollars for clothes, haircuts, hotels, and meals.

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 Weinberg for Colorado, a candidate committee registered with the Colorado Secretary of State, ID # 20225044063.

6. Respondent is Ron Weinberg, an active candidate for state office and elected Representative to the Colorado State House in House District 51, ID # 20235045403.

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 the Division’s November 19, 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. Rep. Ron Weinberg is a member of the Colorado State House of Representatives. He was appointed to the House in 2023 and reelected at the general election in November 2024. Weinberg for Colorado is the candidate committee formed to support Weinberg’s candidacy.

12. The Committee’s purpose is to “support and raise funds for Republican Ron Weinberg to House District 51.”

13. On August 11, 2025, the Division received a campaign finance complaint against Weinberg filed by Brandeis Bradley. The Bradley Complaint alleged that Weinberg had violated Colorado law by using campaign funds for personal purposes.

14. The Bradley Complaint identified several expenditures that Bradley claimed were not campaign related. These included expenditures made to an Israeli Football Club, a barbershop, and the Monarch casino in Blackhawk, CO.

15. The Division reviewed and investigated the Complaint. In addition to the expenditures identified by Bradley, the Division identified others that did not seem reasonably related to campaign purposes.

16. Excepting restaurants, which are addressed in more detail below, a list of the relevant expenditures is attached as Exhibit A.

17. Although some of these expenditures, in isolation, may be reasonably related to supporting Weinberg's election, the sheer volume of questionable expenditures is a sharp departure from other candidates and committees.

18. The Committee also reported a \$525 expenditure to "Mountain View High School" on September 9, 2024. On information and belief, Mountain View High School has no record of that amount being received from the Committee.

19. During the Division's review and investigation of the Bradley Complaint, the Division corresponded with the Committee's registered agent, Marge Klein.

20. On September 2, 2025, Klein responded to the Division's Initial Review with a "Notice of Intent to Cure." On that form, Klein indicated that Weinberg believed the identified expenditures were "legitimate expenditures for a State Representative."

21. Later, Klein responded to a Request for Information from the Division. In this later communication, Klein referred back to her previous communication, and said that instead of "legitimate expenditures for a State Representative," "I should have said for a candidate running for the State Legislature."

22. In this follow-up communication, Klein attached an email from "Ron@RepWeinberg.com". The email is dated October 2, 2025, and includes the phrase: "I declare under penalty of perjury under the law of Colorado that the foregoing is true and correct."

23. The Weinberg email includes an explanation for each of the identified expenditures. Those explanations are reproduced in the final column of Exhibit A.

24. In addition to the expenditures identified in Exhibit A, the committee also spent thousands of dollars at restaurants and bars. On information and belief, not all of those expenditures were made for campaign purposes.

25. For example, between July 13, 2023 and May 20, 2025, the Committee reported 42 separate expenditures to “McGraffs,” totaling \$3,566.19. On information and belief, “McGraffs” is McGraff’s American Grill, a bar and restaurant located approximately one mile from Weinberg’s physical address in Loveland, CO.

26. A full list of restaurant expenditures reported by the Committee is attached as Exhibit B.

27. According to the Committee, following the November 2024 general election, the Committee had \$6,936.29 in unexpended campaign contributions.

28. These unexpended campaign contributions would only be available for use as “unexpected funds” as outlined in Section 1-45-106(1)(b), C.R.S., following the 2024 election cycle, which concluded on December 5, 2024.

29. As of the date of this filing, the Committee has reported \$9,010.74 in campaign expenditures in 2025.

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30. With very limited exceptions, “in no event shall contributions to a candidate committee be used for personal purposes not reasonably related to supporting the election of the candidate.” § 1-45-106(1)(a)(II), C.R.S. (2025).

31. Those narrow exceptions are:

- a. During a campaign, a candidate committee “may expend contributions received and accepted by the committee . . . to reimburse the candidate for reasonable and necessary expenses for the care of children or other dependents the candidate incurs directly in connection with the candidate’s campaign activities during the election cycle.” § 1-45-103.7(6.5).

- b. A person “elected to public office” may also use “unexpended campaign contributions held by the person’s candidate committee for any of the following purposes: (I) Voter registration; (II) Political issue education, which includes obtaining information from or providing information to the electorate; (III) Postsecondary educational scholarships; (IV) To defray reasonable and necessary expenses related to mailings and similar communications to constituents; [and] (V) Any expenses that are directly related to such person’s official duties as an elected official, including, but not limited to, expenses for the purchase or lease of office equipment and supplies, room rental for public meetings, necessary travel and lodging expenses for legislative education such as seminars, conferences, and meetings on legislative issues, and telephone and pager expenses.” § 1-45-106(1)(b).

CLAIM ONE
UNLAWFUL USE OF CAMPAIGN CONTRIBUTIONS
(§ 1-45-106(1)(a)(II), C.R.S.)

32. All preceding allegations are incorporated.
33. Between 2023 and 2025, the Committee used campaign contributions to provide personal benefits to the candidate, Ron Weinberg.
34. These expenditures were used for personal purposes and were not reasonably related to supporting Weinberg’s election or reelection.
35. Nor were they directly related to Weinberg’s official duties as an elected official.
36. 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.
2. Such other relief as the Hearing Officer may deem appropriate.

Respectfully submitted this 19th 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 19th day of December, 2025, by email and/or U.S. mail, addressed as follows:

Weinberg for Colorado
C/O Registered Agent Marge Klein
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Respondent

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Third-Party Complainant

/s/ Peter G. Baumann