

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. 2025 AHO 12 CPF

ED Case No. 2024-88

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

YARA FOR COLORADO,

Respondent.

DECLARATION OF PETER G. BAUMANN

I, Peter G. Baumann, swear and declare as follows:

1. I am a Senior Assistant Attorney General and Assistant Solicitor General in the Colorado Office of the Attorney General.

2. I am counsel of record to the Elections Division of the Secretary of State in this matter.

3. On April 17, 2025, I served a copy of the Complaint in this action on Yara for Colorado (the "Committee") in two ways:

- a. I emailed a copy of the Complaint to the Committee's Registered Agent, Michael Stolz, at the email address listed on the Committee's Committee Registration: mrstolz@yahoo.com. I also emailed a copy of the Complaint to the candidate, Yara Zokaie, at yaraforco@gmail.com.

- b. I also mailed the Complaint, by first class mail, to the address on the Committee's registration statement: 1738 Foggy Brook Dr. Fort Collins, CO 80528.
4. Following service of the Complaint, I emailed a First Set of Discovery Requests to the Committee on April 21, 2025. To date, I have not received responses to those requests.
5. After the Committee did not respond to the Complaint, I began preparing a motion for entry of default judgment. As part of that process I contacted the Committee and spoke with the candidate, Yara Zokaie. Zokaie indicated that the Committee wanted to resolve the allegations in the Division's Complaint.
6. We engaged in settlement discussions, and reached agreement on a fine to resolve the allegations in the Division's Complaint.
7. Based on that agreement in principle, the Division moved to stay proceedings before the Hearing Officer.
8. Shortly after filing that Motion to Stay, the Division prepared and sent a draft settlement agreement to the Committee by email. The Committee did not respond.
9. I attempted to contact the Committee by telephone and email throughout the fall and winter of 2025. I received no answer.
10. On December 18, 2025, I moved to lift the stay. On December 20, 2025, I also re-served the discovery requests that I originally served on April 21, 2025. To date, I have not received a response to those requests.
11. I am emailing a copy of the Motion for Entry of Default Judgment and the supporting exhibits to MrStolz@yahoo.com and yaraforco@gmail.com. I am also mailing copies of those documents to the Committee's address by first class mail, 1738 Foggy Brook Dr. Fort Collins, CO 80528.

I declare under penalty of perjury under the law of Colorado that the foregoing is true and correct.

Date: January 9, 2026.

s/ Peter G. Baumann

Peter G. Baumann
Senior Assistant Attorney General