

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.

MOTION TO STAY

The Elections Division of the Colorado Department of State moves to stay proceedings in this case. As good cause, the Division states:

1. This case is currently in default proceedings. On January 13, 2026, the Hearing Officer entered a default judgment against Respondent, Yara for Colorado. The entry of default concluded: “Unless Respondent moves to set aside the default within ten days, a Judgment by Default will be entered in the amount of \$54.84 against Yara for Colorado.” Entry of Default, ¶ 10 (Jan. 13, 2025).

2. The parties have agreed to a settlement agreement to resolve the allegations in the Division’s Complaint. The settlement agreement includes a monetary fine in the amount of \$54.84.

3. Both the Division and Respondent have executed that agreement. They submitted that agreement to the Deputy Secretary of State for his approval on Wednesday morning, January 21, 2026.

4. Because the parties anticipate that the settlement agreement will resolve this matter in full, the Division respectfully requests that the Hearing Officer stay further proceedings in this matter, including relating to the entry of default, pending approval of the settlement agreement.

5. Once the agreement is approved, the Division will move to dismiss this proceeding. If the agreement is not approved, the Division will move to lift the stay.

Accordingly, the Division respectfully requests that the Hearing Officer stay proceedings in this matter.

Respectfully submitted this 21st day of January, 2026.

NATALIE HANLON LEH
Chief Deputy 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 21st day of January, 2026, by email and/or U.S. mail, addressed as follows:

Yara for Colorado
C/O Registered Agent Michael Stolz
1738 Foggy Brook Dr.
Fort Collins, CO 80528
MrStolz@yahoo.com; yaraforco@gmail.com
Respondent

Stephen Yurash
713 Milan Terrace Dr.
Fort Collins, CO 80525
syurash@hotmail.com
Third-Party Complainant

/s/ Peter G. Baumann