

STATE OF COLORADO  
SECRETARY OF STATE  
1700 BROADWAY #550  
DENVER, COLORADO 80290

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BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE,  
ADMINISTRATIVE HEARING OFFICER

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AHO Case No. \_\_\_\_\_

ED Case No. 2025-94

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In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

PAMELA J JONES FOR WSD3 SCHOOL BOARD,

Respondent.

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### **COMPLAINT**

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Pursuant to § 1-45-111.7, C.R.S. (2024), the Elections Division of the Secretary of State files this complaint Pamela J Jones for WSD3 School Board (“Respondent” or the “Committee”).

### **BACKGROUND**

1. Under Colorado law, candidate committees must timely report their contributions and expenditures to provide information to the public about the sources of election-related activity and communications. Candidate committees are also prohibited from accepting contributions to other candidate committees.

2. Here, the Committee failed to timely disclose an expenditure it made on 1,000 hand cards. The Committee also accepted a contribution from another candidate committee in the form of yard signs that the other committee paid for, but that advocated for Ms. Jones’s election as well.

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 Pamela J Jones for WSD3 School Board, a candidate committee registered with the Colorado Secretary of State, ID # 20245047903.

### **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 January 7, 2026, 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. In 2025, Pamela Jones ran for school board director in the Widefield 3 District in El Paso County. Ms. Jones’s husband, Robin Jones, also ran for school board director in the same district.

11. On October 25, 2025, the Division received a campaign finance complaint filed by Elizabeth Rosenbaum against Pamela Jones. The Rosenbaum complaint alleged that Ms. Jones had failed to include required disclaimers on campaign materials, had failed to accurately report campaign expenditures, and used campaign funds for personal expenditures.

12. The Division reviewed and investigated the Rosenbaum complaint.

13. On September 3, 2025, the Committee spent \$93.67 at “GotPrint.com.” On information and belief, this expenditure was for hand cards supporting Ms. Jones’s candidacy.

14. The Committee did not originally include this expenditure on the report of contributions and expenditures it filed on September 15, 2025.

15. During its investigation, the Division reviewed an expenditure made by the candidate committee supporting Robin Jones's candidacy.

16. On October 3, 2025, Mr. Jones's candidate committee paid \$248.05 to Signs on the Cheap for white yard signs.

17. On information and belief, those yard signs expressly advocated for both Robin Jones and Pamela Jones's election.



18. On information and belief, the Committee did not have a cost-sharing agreement with the candidate committee supporting Robin Jones's candidacy.

19. The signs, which were distributed to voters in the November 2025 election for school board director in WSD3 school district, were an in-kind contribution from the committee supporting Robin Jones to the Committee.

20. During its investigation, the Division reviewed the Committee's reports of contributions and expenditures. The Division also corresponded with the Committee.

21. Based on that investigation, the Division determined that the Committee spent a total of \$613.97 on communications during the 2025 election cycle.

## **COLORADO CAMPAIGN FINANCE LAW**

22. Under Colorado law, “all candidate committees . . . shall report to the appropriate officer their contributions received, including the name and address of each person who has contributed twenty dollars or more; expenditures made, and obligations entered into by the committee[.]” § 1-45-108(1)(a)(I), C.R.S. (2025).

23. Under Colorado law, “[n]o candidate committee shall accept contributions from, or make contributions to, another candidate committee.” Colo. Const. art. XXVIII, § 3(6).

### **CLAIM ONE FAILURE TO REPORT CONTRIBUTIONS AND EXPENDITURES (§ 1-45-108(1)(a)(I), C.R.S.)**

24. All preceding allegations are incorporated.

25. On September 3, 2025, the Committee spent \$93.67 at “GotPrint.com. On information and belief, this expenditure was for hand cards.

26. The Committee did not timely report that expenditure.

27. The Division is entitled to relief under Article XXVIII of the Colorado Constitution and the Fair Campaign Practices Act, § 1-45-101 et seq.

### **CLAIM TWO ACCEPTANCE OF A PROHIBITED CONTRIBUTION (COLO. CONST. ART. XXVIII, § 3(6))**

28. Paragraphs 1-23 are hereby incorporated.

29. On October 3, 2025, a candidate committee made an expenditure on yard signs that advocated, in part, for Pamela Jones’s election.

30. On information and belief, the two committees did not have a cost-sharing agreement that covered those signs.

31. This constituted an unlawful contribution from one candidate committee to another candidate committee.

32. 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.

### **CLAIMS NOT PURSUED**

1. The Rosenbaum complaint also alleged that the Committee had failed to include compliant disclaimers on its electioneering communications and had used campaign funds for personal purposes.

2. As to the former, based on its investigation the Division determined that the Committee did not meet the \$1,000 threshold requiring disclaimers on its communications. *See* § 1-45-108.3, C.R.S.

3. As to the latter, the Rosenbaum complaint alleged that one of the Committee's expenditures—for a campaign website—was improperly made to her husband's company.

4. The Division investigated the Committee's expenditures, and determined that the amount paid—and what the Committee received in return for the payment—was reasonable compared to similar expenditures to other similar companies.

5. Accordingly, the Division determined that the expenditures were for a proper campaign purpose.

Respectfully submitted this 6th day of February, 2026

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 6<sup>th</sup> day of February, 2026, by email and/or U.S. mail, addressed as follows:

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*Third-Party Complainant*

/s/ Peter G. Baumann