

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. 2025-93

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

ROBIN J JONES FOR WSD3 SCHOOL BOARD DIRECTOR,

Respondent.

COMPLAINT

Pursuant to § 1-45-111.7, C.R.S. (2024), the Elections Division of the Secretary of State files this complaint Robin 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 making contributions to other candidate committees.

2. Here, the Committee failed to timely report two expenditures, including on yard signs. And the Committee’s yard-signs—which also expressly advocated for another candidate running in the same race—were a prohibited contribution from one candidate committee to another.

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 Robin J Jones for WSD3 School Board Director, a candidate committee registered with the Colorado Secretary of State, ID # 20255051093.

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, Robin Jones ran for school board director in the Widefield 3 District in El Paso County. Mr. Jones’s wife, Pamela Jones, also ran for school board director in the same district.

11. Mr. Jones filed his candidate affidavit attesting his candidacy on August 28, 2025. His candidate committee is Robin J Jones for WSD3 School Board.

12. Under Colorado law, as a candidate for school board in the November 2025 election who did not file an affidavit until August 28, 2025, Mr. Jones was obligated to file bi-weekly reports of contributions and expenditures through October 27, 2025. *See* § 1-45-108(2)(a)(I)(D), C.R.S. (2025).

13. The Committee timely filed reports of contributions and expenditures on September 15, 2025, and September 29, 2025. The Committee reported no contributions or expenditures on either of those reports.

14. On information and belief, the remaining reports during the 2025 election season were not “assigned” to the Committee, meaning a user would not have been able to see—in TRACER—that the Committee was required to file reports on those dates.

15. Accordingly, the Committee did not originally file the remaining required reports, missing three reporting periods: one that ran from September 25, 2025 through October 8, 2025, one that ran from October 9, 2025, through October 22, 2025, and one that ran from October 23, 2025, through December 4, 2025.

16. On September 13, 2025, the Committee paid \$10.19 to “Hostinger International LTD” for the domain name and registration of a website, www.robin4wsd3.com.

17. This expenditure should have been reported on the September 29, 2025, report of contributions and expenditures (which the Committee was assigned in TRACER). The Committee did timely file this report, but the Hostinger International expenditure but was not originally reported as part of that report.

18. On October 3, 2025, the Committee paid \$248.05 to Signs on the Cheap for white yard signs.

19. This expenditure should have been reported on the Committee’s October 14, 2025, report of contributions and expenditures, but was not originally reported on that date. This is one of the mandatory reports the Committee was not assigned in TRACER.

20. Each of these expenditures were funded by contributions made by Mr. Jones to his own candidate committee. These contributions were also not timely reported.

21. The October 3, 2025, expenditure to Signs on the Cheap funded yard signs. On information and belief, those yard signs expressly advocated for both Robin Jones and Pamela Jones’s election.



22. On information and belief, the Committee did not have a cost-sharing agreement with the candidate committee supporting Pamela Jones’s candidacy.

23. 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 to the candidate committee supporting Pamela Jones.

COLORADO CAMPAIGN FINANCE LAW

24. 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).

25. These reports must be filed, “on the first Monday in September and on each Monday every two weeks thereafter before [a] major election.” § 1-45-108(2)(a)(I)(D), C.R.S.

26. Major election “means the election that decides an issue committee’s issue, the election that elects a person to the public office sought by the candidate committee’s candidate, and a regular biennial school election.” § 1-45-108(2)(a)(III), C.R.S.

27. 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.)

28. All preceding allegations are incorporated.

29. In 2025, the Committee received contributions and made expenditures that were not timely reported. These included expenditures on a campaign website and on yard signs.

30. At least one of these expenditures, and its corresponding contribution, were not reported on a report that the Committee timely filed.

31. 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
PROHIBITED CONTRIBUTION FROM A CANDIDATE COMMITTEE TO A
CANDIDATE COMMITTEE
(COLO. CONST. ART. XXVIII, § 3(6))

32. Paragraphs 1-27 are hereby incorporated.

33. On October 3, 2025, the Committee made an expenditure on yard signs. The yard signs expressly advocated for Pamela Jones, and therefore constituted a contribution to the Pamela Jones candidate committee.

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

35. 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 6th day of February, 2026

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

Robin J Jones for WSD3 School Board Director
C/O Registered Agent Robin J Jones
500 Rose Dr.
Colorado Springs, CO 80911
Robin@robin4wsd3.com and 719turbomedia@gmail.com
Respondent

Elizabeth Rosenbaum
10031 Avenida Hermosa View
Fountain, CO 80817
2lizrosenbaum@gmail.com
Third-Party Complainant

/s/ Peter G. Baumann