

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. 2025-43

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In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

JENNIFER MCGAVIN ELECTION COMMITTEE,

Respondent.

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### **MOTION TO STAY**

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Alongside this Motion, the Elections Division is filing a complaint against Jennifer McGavin Election Committee. The parties have reached an agreement to resolve the allegations in the Division's complaint and are submitting their agreement to the Deputy Secretary of State for his approval.

Because the parties anticipate that the settlement agreement will resolve this matter in full, the Division respectfully requests that the Hearing Officer stay proceedings in this matter pending finalization of the settlement agreement. Once the agreement is approved, the Division will move to dismiss this proceeding. If the parties are unable to finalize their agreement, the Division will move to lift the stay.

Respectfully submitted this 19th 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 19<sup>th</sup> day of February, 2026, by email and/or U.S. mail, addressed as follows:

Jennifer McGavin Election Committee  
C/O Registered Agent Jennifer McGavin  
42822 Hidden Valley Dr.  
Paonia, CO 81428  
Jennifermcgavin2025@gmail.com  
*Respondent*

Richard Lee Stelter  
PO Box 573  
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*Third-Party Complainant*

/s/ Peter G. Baumann