

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. 2025-60, 2025-61, 2025-76, 2025-82

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In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

JEREMIAH JOHNSON, and ELEVATE WITH LAURA

Respondents.

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### **COMPLAINT**

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Pursuant to § 1-45-111.7, C.R.S. (2025), the Elections Division of the Secretary of State files this complaint against Jeremiah Johnson and Elevate with Laura (the “Committees” or “Respondents”).

### **BACKGROUND**

1. To provide voters with information about the sources of election-related communications, Colorado law requires entities spending a certain amount on electioneering communications to include in those communications a disclaimer identifying the person who paid for the advertisement. If the person is a non-natural person, the disclaimer must also identify the person’s registered agent.

2. Here, the Committees failed to include compliant disclaimers on just under \$5,000 worth of communications during the 2025 election cycle. Although the Committees were able to cure some of the noncompliant communications, they were unable to cure all of them.

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 Jeremiah Johnson is a candidate committee registered with the Elections Division, ID # 20255049736.<sup>1</sup>

6. Respondent Elevate with Laura is a candidate committee registered with the Elections Division, ID # 20255049731.

### **JURISDICTION AND VENUE**

7. The Division has jurisdiction under § 1-45-111.7.

8. The Division files this complaint with a hearing officer consistent with § 1-45-111.7(5)(a)(IV).

9. This complaint is timely filed within thirty days of Division’s February 5, 2026, Notice of Investigation, according to § 1-45-111.7(5)(a)(IV).

10. Venue is proper before the hearing officer under § 1-45-111.7(5).

### **ALLEGATIONS**

11. In 2025, Jeremiah Johnson and Laura Hansen were candidates for separate school district director seats in Buena Vista R-31 School Board. They each appeared on the November 2025 ballot for that office.

12. The Committees were the candidate committees organized to support Johnson and Hansen’s elections.

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<sup>1</sup> Jeremiah Johnson is also the name of the candidate supported by the Jeremiah Johnson candidate committee. This action is brought against the committee, not the individual.

13. On October 16, 2025, and again on October 22, 2025, the Division received campaign finance complaints alleging that a joint communication from the Committees did not include a “paid for by” disclaimer.

14. Because the complaints arose from a common set of operative facts, the Division consolidated the complaints, and reviewed and investigated the complaints.

15. During its review and investigation, the Division determined that the Committees had distributed two communications that did not originally include a compliant disclaimer.

16. First, the Committees distributed a regular biennial school electioneering communication—specifically, a mailer—that did not include a compliant “paid for by” disclaimer. The Committees spent \$3,201.86 on this communication.

17. Second, the Committees ordered from a vendor a second regular biennial school electioneering communication that did not include a “paid for by” disclaimer.

18. Of this second communication, \$1,111.82 worth were distributed without a “paid for by” disclaimer.

19. However, after receiving notice of the complaints, the Committees obtained and attached stickers containing a compliant “paid for by” disclaimer to the remaining copies of the second mailer. The Committee spent \$511.22 on the copies of this mailer that they were able to cure.

20. On information and belief, each of the two committees paid for half of the cost of the communications.

### **COLORADO CAMPAIGN FINANCE LAW**

21. Under Colorado law, “any person who expends one thousand dollars or more per calendar year on . . . regular biennial school electioneering communications shall, in accordance with the requirements specified in section 1-45-107.5(5), state in the communication the name of the person making the communication.” § 1-45-108.3(3), C.R.S. (2025).

22. Under 107.5(5), that statement must (I) say that “The communication has been ‘paid for by (full name of the person paying for the communication’; and (II) identif[y] a natural person who is the registered agent if the person identified in subsection (5)(a)(I) of this section is not a natural person.” § 1-45-107.5(5)(a).

23. A “regular biennial school electioneering communication” is an “electioneering communication” that applies to candidates and elections for biennial school boards. § 1-45-103(15.5).

24. An “electioneering communication” is “any communication broadcasted by television or radio, printed in a newspaper or on a billboard, directly mailed or delivered by hand to personal residences or otherwise distributed that: (I) Unambiguously refers to any candidate; (II) is . . . distributed within . . . sixty days before a general election; and (III) Is . . . distributed to an audience that includes members of the electorate for such public office.” Colo. Const. art. XXVIII, § 2(7)(a).

**CLAIM ONE**  
**FAILURE TO INCLUDE A COMPLIANT DISCLAIMER**  
**(§ 1-45-108.3(3), C.R.S.)**

25. All preceding allegations are incorporated.

26. In 2025, the Committees distributed more than \$1,000 of regular biennial school electioneering communications.

27. Each of these communications referred to Jeremiah Johnson and Laura Hansen, were distributed to members of the electorate for the office those candidates were seeking, and were distributed within 60 days of the general election for that office.

28. Those communications did not originally include a “paid for by” disclaimer as required by law.

29. 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 9th day of March, 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 9th day of March, 2026, by email and/or U.S. mail, addressed as follows:

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C/O Registered Agent David Hansen  
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/s/ Peter G. Baumann