

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. 2025-07

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

ARMAGOST FOR HD64, and RYAN ARMAGOST,

Respondents.

COMPLAINT

Pursuant to § 1-45-111.7, C.R.S. (2025), the Elections Division of the Secretary of State files this complaint against Armagost for HD64 (the “Committee”) and Ryan Armagost (collectively, “Respondents”).

BACKGROUND

1. Under Colorado law, candidate committees are prohibited from accepting contributions from corporations.
2. Here, the Committee accepted a \$763.94 contribution from the American Legislative Exchange Council (“ALEC”) during the 2024 election cycle. ALEC is a corporation and thus prohibited from making contributions to Colorado candidates. The Committee reported this payment from ALEC as a contribution and described its purpose as, in part, assisting Ryan Armagost in being a better candidate for office.
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 Armagost for HD64 is a candidate committee registered with the Colorado Secretary of State, ID # 20215041804.
6. Respondent Ryan Armagost is a candidate who ran for state office in 2024, in House District 64, ID # 20215041805.

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 Feb. 11, 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. Ryan Armagost was a candidate for Colorado House District 64 in 2024. He appeared on the November 5, 2024 general election ballot for House District 64.
12. Armagost for HD64 was the candidate committee organized to support Armagost’s candidacy.
13. On the Committee’s September 30, 2024 Report of Contributions and Expenditures, the Committee reported receiving a \$763.94 contribution from the American Legislative Exxchange [sic] Council, out of Arlington Virginia.
14. On information and belief, this contribution came from ALEC.

Full Name of Committee/Person: ARMAGOST FOR HD64

1. Date Accepted 09/16/2024	4. Name AMERICAN LEGISLATIVE EXXCHANGE COUNCIL
2. Contribution Amount \$763.94	5. Address 2900 CRYSTAL DR 6TH FLOOR
3. Aggregate Amount* \$763.94	6. City/State/Zip ARLINGTON VA 22202
Electioneering Comm? No	7. Description 8. Employer 9. Occupation

15. On March 4, 2025, the Division filed a campaign finance complaint against the Committee under Section 1-45-111.7(7), C.R.S. The complaint alleged that the Committee had accepted a prohibited corporate contribution.

16. According to its most-recent IRS Form 990, ALEC is a 501(c)(3) nonprofit corporation.

17. On information and belief, ALEC accepts contributions from business corporations or labor unions.

18. On March 17, 2025, Marge Klein, the Committee’s Registered Agent, submitted a Notice of Intent to Cure. The Notice indicated that the Committee had amended its September 3, 2024 Report of Contributions and Expenditures “to apply the check as a reimbursement from ALEC instead of filing it as a contribution.”

19. The Committee also amended its reports to report several “returned expenditures,” equaling \$763.94 – the amount originally reported as a contribution from ALEC. These included parking at Denver International Airport, airfare insurance, and flights with United Airlines.

20. On May 12, 2025, the Division requested additional information from the Committee.

21. Ryan Armagost responded to the request for information. In the response, Armagost explained that the relevant ALEC contributions were reimbursements he submitted to ALEC for attending the ALEC annual meeting in Denver in 2024. Armagost also explained

that contrary to the amendments made to his reports of contributions and expenditures, “there was no airline travel associated with this reimbursement.”

22. In a follow-up communication, Armagost provided reimbursement receipts related to the ALEC meeting. The reimbursements were to “Ryan Armagost,” and totaled \$763.94.

23. In response to the Division’s inquiry as to “how any of the reported expenses, now reported as returned expenditures, were reasonably related to supporting [Armagost’s candidacy for elective office,” Armagost replied: “These conferences and seminars cover topics that are extremely pertinent in my House District, therefore making me a better *candidate* and legislator for my constituents, as well as the state of Colorado.” (emphasis added).

24. Based on the receipts provided by Armagost, the ALEC meeting conference fee (\$575) was originally paid on April 15, 2024. The travel expenses associated with attending the ALEC meeting (\$188.94) were incurred in late-July 2024 and uploaded to ALEC on August 5, 2024.

25. According to the Committee’s reports, the Committee received the check from ALEC on September 16, 2024.

COLORADO CAMPAIGN FINANCE LAW

26. Under Colorado law, it is unlawful for a corporation “to make contributions to a candidate committee.” Colo. Const. art. XXVIII, § 3(4)(a).

27. This prohibition does not apply to corporations that, among other things, were “not established by and [do] not accept contributions from business corporations or labor unions.” Colo. Const. art. XXVIII, § 3(4)(b).

28. Under Colorado law, a contribution includes a “payment . . . made to any candidate committee,” and “anything of value given, directly or indirectly, to a candidate for the purpose of promoting the candidate’s nomination, retention, recall, or election.” Colo. Const. art. XXVIII, §§ 2(5)(a)(I), (IV).

CLAIM ONE
ACCEPTING PROHIBITED CONTRIBUTIONS
(Colo. Const. art. XXVIII, § 3(4)(a))

29. All preceding allegations are incorporated.

30. On September 16, 2024, the Committee accepted a \$763.94 contribution from ALEC, a corporation.

31. According to Ryan Armagost, the contribution was to reimburse expenses associated with attending a conference in order to make him “a better candidate.”

32. Thus, the Committee received a payment, which was also a thing of value, given to Armagost and indirectly through him to his Committee, for the purpose of promoting his election.

33. That contribution was prohibited by Colorado law.

34. 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 13th 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 13th day of March, 2026, by email and/or U.S. mail, addressed as follows:

Armagost for HD 64
C/O Registered Agent Marge Klein
Address Redacted at Respondent's Request
mklein@swspolifi.com; ryan@armagost64.com
Respondent

Ryan Armagost
Address Redacted at Respondent's Request
ryan@armagost64.com
Respondent

/s/ Peter G. Baumann