

Azing. 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 Nos. 2025-71, 2025-72, 2025-73, and 2025-74

---

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

KRAMER FOR DCSD, VAIL FOR DCSD, GAMBILL FOR DCSD, and SMITH FOR  
DCSD,

Respondents.

---

### **MOTION TO STAY**

---

Alongside this Motion, the Elections Division is filing a complaint against Respondents. 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 15<sup>th</sup> day of April, 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, 6<sup>th</sup> Floor  
Denver, Colorado 80203  
Telephone: 720-508-6152  
Fax: 720-508-6041  
[peter.baumann@coag.gov](mailto:peter.baumann@coag.gov)  
\*Counsel of Record

**CERTIFICATE OF SERVICE**

This is to certify that I will cause the foregoing to be served this 15<sup>th</sup> day of April, 2026, by email and/or U.S. mail, addressed as follows:

Kramer for DCSD  
C/O Registered Agent Katie Kennedy  
2202 Rim Ridge Dr.  
Castle Pines, CO 80108  
katie@strategiccompliancellc.com

Vail for DCSD  
C/O Registered Agent Katie Kennedy  
15635 Greenstone Lane  
Parker, CO 80134  
katie@strategiccompliancellc.com

Smith for DCSD  
C/O Registered Agent Katie Kennedy  
3680 Penang Dr.  
Castle Rock, CO 80109  
katie@strategiccompliancellc.com

Gambill for DCSD  
C/O Registered Agent Katie Kennedy  
4928 Trails Edge Lane  
Castle Rock, CO 80104  
katie@strategiccompliancellc.com  
*Respondents*

Scott Undercofler  
21285 Martingale Ln.  
Parker, CO 80138  
scottu@huenix.com

/s/ Peter G. Baumann