

Submit complaint by mail or email to:

Colorado Secretary of State
Campaign Finance Enforcement
1700 Broadway, Suite 550
Denver, CO 80290
CPFcomplaints@ColoradoSOS.gov



CAMPAIGN FINANCE COMPLAINT FORM

Any person may file a complaint up to 180 days after the date on which the Complainant either knew or should have known, by the exercise of reasonable diligence, of an alleged violation. A complainant must specifically identify one or more respondents, a violation of Colorado campaign finance rules and regulations (Constitution Article XXVIII, the Fair Campaign Practices Act, or the Secretary of State's rules concerning Campaign and Political Finance), and allege specific facts to support a legal and factual basis for the complaint. (See section 1-45-111.7, C.R.S.)

Please be advised, complaints are public information and the respondent will be provided a copy of this Complaint. The Division must have sufficient contact information to identify the Respondent and be able to correspond and communicate with both the Complainant and Respondent.

Your Information (Complainant): Contact information for the person or entity filing the complaint:

Full Name: Kristi Burton Brown

Mailing Address: 5950 S. Willow Dr., Ste. 210, Greenwood Village, CO 80111

Telephone Number: (303) 758-3333 Email Address: kristi@cologop.org

Respondent's Information: Contact information for the person or entity alleged to have committed the violation:

Full Name: Jared Polis

Mailing Address: 200 E Colfax Ave, Denver, CO 80203

Telephone Number: (303) 866-2471 Email Address: _____

Website (if applicable): _____

Please provide the following information (failure to provide sufficient information could result in the complaint being dismissed):

- Date you learned of the violation: 8/4/2022
- Alleged violation(s) of campaign finance laws, rules, or regulations (if known) that were violated. For reference, the Fair Campaign Practices Act and the Campaign Finance Rules available, [here](#).
 - Failure to file a candidate affidavit
 - Failure to report an expenditure
 - Prohibited contribution
 - Missing or improper disclaimer
 - OTHER: Violation of electioneering law
 - Failure to register a committee
 - Failure to report a contribution
 - Prohibited expenditure
 - Inaccurate or incomplete filing
- Facts to support your allegations (Please provide additional information on next page.)

Complaint form must be signed on bottom of second page.

Please detail the allegations of your complaint including dates of the alleged violations and explain how you were made aware of the violation. If known, please cite the provisions of Article XXVIII of the Colorado Constitution, the Fair Campaign Practices Act, Article 45, Title 1, C.R.S., or the Secretary of State's Campaign Finance Rules you believe were violated. **Please provide any supporting documentation or evidence to support your allegations of a Colorado campaign finance law violation(s).**

Today, Gov. Jared Polis released a letter he is sending to every taxpayer in Colorado, along with their \$750 TABOR refund check. This letter blatantly misleads voters by refusing to say the word "TABOR" or "Taxpayer Bill of Rights." Instead, the Governor uses his own campaign language of "Colorado Cashback," a phrase he coined during his campaign for re-election.

Due to the Governor's use of campaign language, this letter is a campaign mailing and not an official "instructional letter" as he told the media. The Governor's refusal to call the refund a TABOR refund, after he campaigned against TABOR refunds in 2019, demonstrates that he is promoting his own campaign instead of being honest with voters and informing them of the true source of the refund: TABOR, not his campaign term "Colorado Cashback."

Furthermore, Jared Polis is spending \$2.7 million in state funds to send this letter prior to his election. \$1.7 million is the specific cost to print and mail. (Spreadsheet of cost attached.) The Governor is using taxpayer dollars to send his own campaign mailer, and this is a plain campaign finance violation. This letter is not in the ordinary course of business, as no Colorado Governor has done this before -- including Jared Polis.

The specific laws the Governor is violating include:

Article XXVIII, Section 3 of the Colorado Constitution - prohibiting campaign donations from the state or other government entities. The state is spending \$2.7 million on this campaign mailer for Jared Polis.

Article XXVIII of the Colorado Constitution, C.R.S. 1-45-103(9), C.R.S. 1-45-103 (15.5) - all define electioneering as a communication this close to an election that unambiguously refers to the candidate. Jared Polis is directly named three times in this letter.

C.R.S. 1-45-108.3 - a campaign mailer must have a disclosure; there is none.

C.R.S. 1-45-117 - No more than \$50 in public money may be spent; \$2.7 million is being spent in taxpayer funds to promote Jared Polis' campaign.

The Governor also failed to report the \$2.7 million in state funds as a campaign contribution.

I hereby submit this complaint signed and in writing under section 1-45-111.7(2), C.R.S. (Electronic signature is permitted.)

Complainant's Signature: _____

Kristi Burton Brown

Date: _____

8/4/22