

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. 2025-58, 2025-85, 2026-27

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

DMITRI ATRASH, ALEXANDRA LESSEM FOR THOMPSON SCHOOL BOARD,
SCHOLL FOR THOMPSON SCHOOL DISTRICT, AND PUBLIC EDUCATION
COMMITTEE,

Respondents.

COMPLAINT

Pursuant to § 1-45-111.7, C.R.S. (2025), the Elections Division of the Secretary of State files this complaint against Dmitri Atrash, Alexandra Lessem for Thompson School Board, Scholl for Thompson School District (“the Candidate Committees”) and Public Education Committee, (collectively, “Respondents”).

BACKGROUND

1. To provide voters with information about the sources of election-related communications, Colorado law requires entities spending a certain amount on regular biennial school 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, like a committee, the disclaimer must also identify the person’s registered agent.

2. Here, Dmitri Atrash, Alexandra Lessem, and Michael Scholl ran on a common slate for separate school district seats on the Thompson R2-J school board during the November 2025 coordinated election. During that election, each of the Candidate Committees failed to include compliant disclaimers on communications that were purchased to support the candidacies of individual candidates and of the common slate. Moreover, Public Education Committee also spent over \$12,000 on advertisements supporting the slate that did not identify Public Education Committee as the source of the advertisements.

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. One Respondent is Dmitri Atrash, a candidate committee registered with the Colorado Secretary of State, ID # 20255049403.¹

6. One Respondent is Alexandra Lessem for Thompson School Board, a candidate committee registered with the Colorado Secretary of State, ID # 20255049327.

7. One Respondent is Scholl for Thompson School District, a candidate committee registered with the Colorado Secretary of State, ID # 20255050168.

8. One Respondent is Public Education Committee, a small donor committee registered with the Colorado Secretary of State, ID # 20035622676.

JURISDICTION AND VENUE

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

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

¹ “Dmitri Atrash” is both the name of the candidate and the candidate committee supporting Mr. Atrash’s candidacy.

11. This complaint is timely filed within 30 days of the Division’s Notice of Investigation dated April 27, 2026.

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

ALLEGATIONS

13. In 2025, Dmitri Atrash, Alexandra Lessem, and Michael Scholl ran on a common slate for separate school district seats on the Thompson R2-J school district. Each appeared on the November 2025 coordinated ballot.

14. Dmitri Atrash, Alexandra Lessem for Thompson School Board, and Scholl for Thompson School District were the candidate committees organized to support each candidate’s candidacy.

15. On October 16, 2025, the Division received a campaign finance complaint filed by Lori Kay Goebel against Dmitri Atrash. The First Goebel Complaint alleged that Atrash’s yard signs did not include compliant disclaimer statements, and also indicated that “Mike Scholl and Alexandra Lessem . . . are also committing this same violation.”

16. Attached to the First Goebel Complaint were several pictures. One picture was of three yard signs, one for each candidate. The signs for Atrash and Scholl did not include a “paid for by” disclaimer. The sign for Lessem included the disclaimer: “paid for by the Committee to Elect Alexandra Lessem.”



17. Another picture was a yard sign that appeared to support all three candidates. It included the disclaimer: “Paid for by the committee to Elect Dmitri Atrash, the Committee

to Elect Alexandra Lessem, and Scholl for Thompson School District.” It did not identify any of the Candidate Committees’ Registered Agents.



18. On October 23, 2025, Goebel filed a second complaint against Dmitri Atrash. The Second Goebel Complaint again alleged that Atrash’s communications did not include a compliant disclaimer statement. This time Goebel identified an advertisement distributed on television and YouTube with an allegedly incomplete disclaimer encouraging voters to vote for all three members of the slate.

19. Attached to the Second Goebel Complaint was a screenshot from the advertisement encouraging voters to “Vote for Dmitri Atrash, Alexandra Lessem Mike Scholl for Thompson School Board.” It included the disclaimer: “Paid for by the Committee to Elect Dmitri Atrash, the Committee to Elect Alexandra Lessem, and Scholl for Thompson School District.” It did not identify any of the Candidate Committees’ Registered Agents.



20. The Division reviewed and investigated the Goebel Complaints. During the review and investigation, the Candidate Committees cooperated with the Division's requests for information, which enabled the Division to determine the full scope of the noncompliance.

21. The Division's investigation concluded that each of the Candidate Committees had purchased communications supporting their individual candidates that did not include compliant disclaimers. The Division also concluded that each of the Candidate Committees had made expenditures to support the slate of candidates together that did not include compliant disclaimers.

22. With regards to the communications that supported the slate as a whole, the communications purchased by the Candidate Committees incorrectly identified Atrash's candidate committee as "the Committee to Elect Dmitri Atrash," even though no such committee exists. The communications also incorrectly identified Lessem's candidate committee as "the Committee to Elect Alexandra Lessem" on certain communications, even though no such committee exists. These communications also failed to identify the Candidate Committees' registered agents.

Dmitri Atrash

23. With regards to Dmitri Atrash, the Division's investigation concluded that the Committee had spent a total of \$6,223.63 on communications that did not include compliant disclaimer statements.

24. With regards to communications supporting Atrash alone, this included:

- a. Newspaper advertisements with no disclaimer;
- b. Meta advertisements and yard signs wrongly identifying the Committee as "Committee to Elect Dmitri Atrash," and not identifying a registered agent; and
- c. A website wrongly identifying the Committee as the "Committee to Elect Dmitri Atrash."

25. With regards to communications supporting the common slate, this included:

- a. Newspaper advertisements, yard signs, banners, flyers and postcards that wrongly identifying one of the Committees as “Committee to Elect Dmitri Atrash,” and not identifying any registered agents.

Alexandra Lessem for Thompson School Board

26. With regards to Alexandra Lessem for Thompson School Board, the Division’s investigation concluded that the Committee had spent a total of \$4,365.16 on communications that did not include compliant disclaimer statements.

27. With regards to communications supporting Lessem alone, this included:

- a. Campaign tee-shirts with no disclaimer;
- b. Meta advertisements that incorrectly identified the Committee’s name, and no registered agent; and
- c. A website that incorrectly identified the Committee’s name.

28. With regards to communications supporting the common slate, this included:

- a. Newspaper advertisements, yard signs, banners, flyers and postcards that wrongly identifying one of the Committees as “Committee to Elect Dmitri Atrash,” and not identifying any registered agents.

Scholl for Thompson School District

29. With regards to Scholl for Thompson School District, the Division’s investigation concluded that the Committee had spent a total of \$3,200.68 on communications that did not include compliant disclaimer statements.

30. With regards to communications supporting Scholl alone, this included:

- a. Campaign tee-shirts with no disclaimer;
- b. Yard signs with no disclaimer; and
- c. A campaign website that did not identify the Committee’s registered agent.

31. With regards to communications supporting the common slate, this included:

- a. Newspaper advertisements, yard signs, banners, flyers and postcards that wrongly identifying one of the Committees as “Committee to Elect Dmitri Atrash,” and not identifying any registered agents.

32. During its review and investigation of the Goebel Complaints, the Division determined that the video referenced in the Second Goebel Complaint was actually paid for by the Public Education Committee.

33. On April 14, 2026, the Division initiated its own complaint against the Public Education Committee under C.R.S. § 1-45-111.7(2). The Division’s Complaint alleged that the Public Education Committee paid \$12,249.99 for two campaign videos that encouraged voters to vote for Dmitri Atrash, Alexandra Lessem, and Michael Scholl.

34. These videos did not identify Public Education Committee as the person paying for the advertisement and did not identify Public Education Committee’s Registered Agent.

35. The Division’s investigation determined that all these communications—from the slate, the individual candidate committees, and the Public Education Committee—were distributed to voters in the November 2025 election for school board in the Thompson R2-J school district, and were distributed within sixty days of that election.

COLORADO CAMPAIGN FINANCE LAW

36. “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).

37. 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).

38. 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; and (II) is . . . distributed within thirty days before a primary election or 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).

39. A “regular biennial school electioneering communication” “has the same meaning as ‘electioneering communication . . . except that, for purpose of the definition of regular biennial school electioneering communication only, ‘candidate’ . . . means a candidate in a regular biennial school election and the requirements specified in section 2(7)(a)(II) [of the Colorado Constitution] mean a communication that is . . . distributed within sixty days before a regular biennial school election.” § 1-45-103(15.5).

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

40. All preceding allegations are incorporated.

41. In 2025, each Respondent distributed more than \$1,000 worth of regular biennial school electioneering communications.

- a. For Dmitri Atrash, this included \$6,233.63 worth of communications that did not include compliant disclaimer statements;
- b. For Alexandra Lessem for Thompson School Board, this included \$4,365.16 worth of communications that did not include compliant disclaimer statements;
- c. For Scholl for Thompson School District, this included \$3,200.68 worth of communications that did not include compliant disclaimer statements; and
- d. For Public Education Committee, this included \$12,249.99 worth of communications that did not include compliant disclaimer statements.

42. Each of these communications referenced at least one of Atrash, Lessem, or Scholl, encouraged voters to support one or more of those candidates, and were distributed to voters in the November 2025 coordinated election for Thompson R2-J School Board within 60 days of that election.

43. None of these communications had compliant “paid for by” disclaimer statements – they either wrongly identified one or more of the candidate committees, did not identify registered agents, or did not identify any committee or registered agent.

44. 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 27th day of May, 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, 6th Floor
Denver, Colorado 80203
Telephone: 720-508-6152
Fax: 720-508-6041

peter.baumann@coag.gov

*Counsel of Record

CERTIFICATE OF SERVICE

This is to certify that I will cause the foregoing to be served this 27th day of May, 2026, by email and/or U.S. mail, addressed as follows:

Dmitri Atrash
C/O Registered Agent Dmitri Atrash
3727 Barr Lake Dr.
Loveland, CO 80538
dmitri@dmitriatrash.com
Respondent

Alexandra Lessem for Thompson School Board
C/O Registered Agent Ann Baker and Candidate Alexandra Lessem
1049 Colorado Ave.
Loveland, CO 80537
Ann.depperschmidt@gmail.com; alexandra4thompson@gmail.com
Respondent

Scholl for Thompson School District
C/O Registered Agent Michael Scholl
2464 Steamboat Springs St.
Loveland, CO 80538
Scholl4thompson@gmail.com
Respondent

Public Education Committee
C/O Kris Gomez
1500 Grant Street
Denver, CO 80203
kgomez@coloradoea.org
Respondent

Lori Kay Goebel
1383 Warbler St.
Loveland, CO 80537
info@votelorigoebel.com
Third-Party Complainant

/s/ Peter G. Baumann