

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. 2026-05

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In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

HARRIS FOR DENVER SCHOOL BOARD

Respondent.

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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 Harris for Denver School Board (the “Committee” or “Respondent”).

### **BACKGROUND**

1. Under Colorado law, candidates for school board director are prohibited from accepting more than \$2,500 in contributions from any natural person.
2. Here, Harris for Denver School Board reported accepting \$6,500 in contributions from Andrea Harris. Although part of this contribution may have been a permissible candidate expenditure or a contribution from the candidate to his own committee, it was reported as a contribution, and the Committee has not amended its reports to state otherwise.
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 is Harris for Dener School Board, a candidate committee registered with the Colorado Secretary of State, ID # 20255048004.

## **JURISDICTION AND VENUE**

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

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

8. This complaint is timely filed within thirty days of Division’s May 4, 2026, Notice of Investigation, according to § 1-45-111.7(5)(a)(IV).

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

## **ALLEGATIONS**

10. Harris for Denver School Board is the candidate committee organized to support Jeremy Harris’s candidacy for Denver School Board, District 4.

11. Jeremy Harris appeared on the November 2025 ballot in Denver County.

12. Under Colorado law, candidates for school board are prohibited from accepting contributions from individuals totaling more than \$2,500.

13. On the Committee’s August 1, 2025 report of contributions and expenditures, the Committee reported receiving an in-kind contribution from Andrea Harris in the amount of \$1,500.

14. On the Committee’s September 2, 2025 report of contributions and expenditures, the Committee reported receiving a monetary contribution from Andrea Harris in the amount of \$2,500.

15. On the Committee's September 29, 2025 report of contributions and expenditures, the Committee reported receiving a non-monetary contribution from Andrea Harris in the amount of \$2,500.

16. In total, during the 2025 election cycle the Committee reported receiving \$6,500 worth of contributions from Andrea Harris.

17. On January 27, 2026, the Division initiated a complaint against the Committee under section 1-45-111.7(7), C.R.S. The Complaint alleged that the Committee had accepted excess contributions from a natural person.

18. On April 3, 2026, the Committee responded through the candidate, Jeremy Harris. The Committee explained that "Andrea Harris is the spouse of candidate Jeremy Harris, and the two share financial accounts." The Committee further indicated that \$2,500 was supposed to be a contribution from Andrea Harris, but that the "remaining \$4,000 consisted of payments made for digital advertising," and "could have been more accurately reported as candidate-related expenditures."

19. The Committee also indicated that it was "reviewing and amending its filings to ensure accurate attribution and reporting consistent with applicable law."

20. The Division requested further information concerning the referenced amendments, but the Committee did not respond.

21. As of the date of this Complaint, the Committee has not amended its reports. The Committee's reports still show contributions in the amount of \$6,500 from Andrea Harris.

22. Even if the Committee's explanation were correct, the Committee violated Colorado law by failing to fully and accurately report its financial activity. Specifically, if \$4,000 worth of the contributions attributed to Andrea Harris should instead have been reported as candidate expenditures made by Jeremy Harris, the Committee's reports did not reflect that.

**COLORADO CAMPAIGN FINANCE LAW**

23. Under Colorado law, a candidate for school board in 2025 was limited to accepting contributions of no greater than \$2,500 from any one natural person per election cycle. § 1-45-103.7(1.7)(a), C.R.S.; 8 CCR 1505-6, Rule 10.17.1(h)(1).

24. Colorado law also requires candidate committees to accurately report “their contributions received, . . . expenditures made, and obligations entered into.” § 1-45-108(1)(a)(I).

**CLAIM ONE  
RECEIPT OF EXCESS CONTRIBUTION  
§ 1-45-103.7(1.7)(A)**

25. All preceding allegations are incorporated.

26. During the 2025 election cycle, the Committee reported receiving more than \$2,500 in contributions from a single donor, Andrea Harris.

27. In total, the Committee accepted \$6,500 in contributions from Andrea Harris, or more than twice the legal limit.

28. To date, the Committee has neither returned those excess contributions nor amended its reports to reflect a different source for those funds.

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 3rd day of June, 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 3rd day of June, 2026, by email and/or U.S. mail, addressed as follows:

Harris for Denver School Board  
C/O Registered Agent Patrick Lewis, II  
C/O Candidate Jeremy Harris  
3278 Syracuse  
Denver, CO 80239  
[treasurer@harris4dps.org](mailto:treasurer@harris4dps.org); [jeremey@harrisfuneraldirectors.com](mailto:jeremey@harrisfuneraldirectors.com)  
*Respondent*

*/s/ Peter G. Baumann*