

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. 2025-99; 2025-100

---

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

TOGETHER WITH TRACIE,

Respondent.

---

### **COMPLAINT**

---

Pursuant to § 1-45-111.7, C.R.S. (2025), the Elections Division of the Secretary of State files this complaint against Together with Tracie, (“Respondent” or “the Committee”).

### **BACKGROUND**

1. To provide voters with information about the sources of election-related communications, Colorado law requires candidates and their committees to report their campaign expenditures. This is particularly important for expenditures that occur prior to the election, so that voters have the benefit of seeing a campaign’s full spending activity prior to voting for or against that candidate.

2. Here, Together with Tracie inadvertently failed to disclose a \$682.93 expenditure it made prior to the election until thirty days after the election had occurred.

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 Together with Tracie, a candidate committee registered with the Secretary of State’s Elections Division, ID # 20255050330.

## **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 filed within 30 days of the Division’s May 7, 2026, Notice of Investigation. § 1-45-111.7(5)(a)(IV).

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

## **ALLEGATIONS**

10. Tracy Alvarado was a candidate for school board director in the Brighton 27J district. She appeared on the November 2025 general election ballot.

11. Together with Tracie was the candidate committee organized to support Alvarado’s candidacy. Its purpose is to “be fiscally responsible for Tracie Alvarado, candidate for SD27J District 6.”

12. On October 21, 2025, the Committee hosted a campaign event. As part of the event, the Committee paid for refreshments from a Kona Ice truck. In total, the Committee paid \$682.93 for the truck to be at the event. The Committee used its bank debit card to pay for the truck, and made the payment during the event.

13. Despite making this expenditure on October 21, 2025, the Committee did not disclose the expenditure on its last report before the November 3, 2025 election. That report, which was due on October 27, 2025, covered expenditures made between October 9, 2025, and October 22, 2025. Instead, the Committee reported the Kona Ice expenditure on its December 3, 2025 report.

14. On November 3, 2025, the Division received two campaign finance complaints filed against the Committee by Brittany Randazzo. The First Randazzo complaint alleged that the Committee had co-hosted pizza parties around the district with another candidate but had not reported any expenditures related to those parties.

15. The Second Randazzo complaint noted the Kona Ice truck had been at the October 21, 2025, event, but that the Committee had not reported any expenditures related to the truck.

16. Because the complaints arose from a common set of operative facts, the Division consolidated the two Randazzo complaints.

17. The Division reviewed and investigated the complaints. Based on its investigation, the Division concluded that the Committee had co-hosted the pizza events with another candidate, Melinda Carbajal, who was running for a seat on Brighton City Council.

18. The Division's investigation determined that the pizza parties were joint campaign events between the two candidates, and that the Committee had paid its proportionate share of the costs to host these events.

### **COLORADO CAMPAIGN FINANCE LAW**

19. Under Colorado law, all candidate committees "shall report to the appropriate officer their contributions received, . . . expenditures made, and obligations entered into." § 1-45-108(1)(a)(I), C.R.S.

20. For school board elections, such reports must be filed "on the first day of each month beginning the sixth full month before the . . . election . . . on the first Monday in September and on each Monday every two weeks thereafter before the . . . election." § 1-45-108(2)(a)(I).

21. Under Colorado law, "an expenditure is made when the actual spending occurs or when there is a contractual agreement requiring such spending and the amount is determined." Colo. const. art. XXVIII, § 2(8)(a).

**CLAIM ONE**  
**FAILURE TO TIMELY REPORT EXPENDITURE**  
**(§ 1-45-108(a)(1)(A))**

22. All preceding allegations are incorporated.

23. On October 21, 2025, the Committee made a \$682.93 expenditure for a Kona Ice truck at a campaign event.

24. That expenditure should have been reported on the Committee's October 27, 2025 report of contributions and expenditures.

25. Instead, the Committee did not report that expenditure until its December 3, 2025 report of contributions and expenditures, 30 days after the election.

26. The Division is entitled to relief under Article XXVIII of the Colorado Constitution and the Fair Campaign Practices Act, § 1-45-101 et seq. and the Greeley Municipal Code.

**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.

**CLAIMS NOT PURSUED**

1. The First Randazzo complaint alleged that the Committee had not reported expenditures associated with pizza parties that were hosted around the district.

2. Under the Secretary's rules, candidate committees may share the costs associated with certain expenditures so long as each committee pays the "proportionate share" of the costs associated with those expenditures. 8 CCR 1505-6, Rule 10.11.1.

3. Here, the Division determined after its investigation that the Committee had paid its proportionate share of the costs associated with the joint events it hosted with another candidate committee.

4. Accordingly, the Division is not pursuing claims associated with those expenditures.

Respectfully submitted this 8th day of June, 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 8<sup>th</sup> day of June, 2026, by email and/or U.S. mail, addressed as follows:

Together with Tracie  
C/O Registered Agent Tracy Nichole Alvarado  
7980 E. 136<sup>th</sup> Dr.  
Thornton, CO 80602  
togetherwithtracie@gmail.com  
*Respondent*

Brittany Randazzo  
7105 Inca Way  
Denver, CO 80221  
Brittany.arguello@gmail.com  
*Third-Party Complainant*

/s/ Peter G. Baumann