

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. 2025 AHO 38 (CPF)

ED Case No. 2025-33

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

WEINBERG FOR COLORADO, and RON WEINBERG

Respondents.

RESPONDENTS' ANSWER

COME NOW the Respondents, RON WEINBERG and WEINBERG FOR COLORADO, and hereby submit this *Answer* pursuant to C.R.C.P. Rule 12, and in support thereof, respond as follows:

1. The allegations in paragraph one (1) of the Complaint are legal conclusions rather than factual assertions, and thus, no response is required. To the extent a response is required or that Plaintiff's allegations mischaracterize any aspect of the law or the legal proceeding described therein, Respondents deny the same.

2. Respondents admit to having campaign expenditures alleged in paragraph two (2) of the Complaint but denies that they were "not reasonably related to his election."

3. Paragraph three (3) contains no specific allegations against Respondents, but rather a conclusory statement which is neither specifically factual or legal by its terms. As such, no response is required. To the extent a response is required, Respondents deny the allegations contained in paragraph three (3) of the Complaint.

PARTIES

4. Respondents admit the allegations in paragraph four (4) of the Complaint.

5. Respondents admit the allegations in paragraph five (5) of the Complaint.

6. Respondents admit the allegations in paragraph six (6) of the Complaint.

JURISDICTION AND VENUE

7. The allegations in paragraph seven (7) of the Complaint are legal conclusions rather than factual assertions, and thus, no response is required. To the extent a response is required or that Plaintiff's allegations mischaracterize any aspect of the law or the legal proceeding described therein, Respondents deny the same.

8. The allegations in paragraph eight (8) of the Complaint are legal conclusions rather than factual assertions, and thus, no response is required. To the extent a response is required or that Plaintiff's allegations mischaracterize any aspect of the law or the legal proceeding described therein, Respondents deny the same.

9. The allegations in paragraph nine (9) of the Complaint are legal conclusions rather than factual assertions, and thus, no response is required. To the extent a response is required or that Plaintiff's allegations mischaracterize any aspect of the law or the legal proceeding described therein, Respondents deny the same.

10. The allegations in paragraph ten (10) of the Complaint are legal conclusions rather than factual assertions, and thus, no response is required. To the extent a response is required or that Plaintiff's allegations mischaracterize any aspect of the law or the legal proceeding described therein, Respondents deny the same.

ALLEGATIONS

11. Respondents admit the allegations contained in paragraph eleven (11) of the Complaint.

12. Respondents admit the allegations contained in paragraph twelve (12) of the Complaint.

13. Respondents are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph thirteen (13) of the Complaint and therefore deny the same. Also, the allegations in paragraph thirteen (13) of the Complaint refer to the “Bradley Complaint” which document speaks for itself.

14. The allegations contained in paragraph fourteen (14) of the Complaint refer to the “Bradley Complaint” which document speaks for itself and requires no response. To the extent a response is required, then Respondents deny the same.

15. Respondents are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph fifteen (15) of the Complaint and therefore deny the same.

16. Paragraph sixteen (16) contains no specific allegations against Respondents, but rather a conclusory statement which is neither specifically factual or legal by its terms. As such, no response is required. To the extent a response is required, Respondents deny the allegations contained in paragraph sixteen (16) of the Complaint.

17. Respondents admit that expenses which are the basis of this lawsuit were indeed reasonably related to supporting the campaign of Ron Weinberg as alleged in paragraph seventeen (17) of the Complaint. Respondents deny all other allegations contained in paragraph seventeen (17) of the Complaint.

18. Respondents admit the committee reported an expenditure to Mountain View High School as alleged in paragraph eighteen (18) of the Complaint. As to the remaining allegations in paragraph eighteen (18) of the Complaint, Respondents are without sufficient knowledge and information to form a belief as to the truth or falsity of said allegations and therefore deny the same.

19. Respondents are without sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in paragraph nineteen (19) of the Complaint and therefore deny the same.

20. Respondents are without sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in paragraph twenty (20) of the Complaint and therefore deny the same.

21. Respondents are without sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in paragraph twenty-one (21) of the Complaint and therefore deny the same.

22. Respondents are without sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in paragraph twenty-two (22) of the Complaint and therefore deny the same.

23. Respondents are without sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in paragraph twenty-three (23) of the Complaint and therefore deny the same.

24. Respondents are without sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in paragraph twenty-four (24) of the Complaint and therefore deny the same.

25. Respondents are without sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in paragraph twenty-five (25) of the Complaint and therefore deny the same.

26. Paragraph twenty-six contains no actual allegations against the Respondents, and as such, does not require a response. To the extent a response is required, Respondents deny the allegations contained in paragraph twenty-six (26).

27. Upon information and belief, Respondents admit the allegations in paragraph twenty-seven (27) of the Complaint.

28. The allegations contained in paragraph twenty-eight (28) contain legal conclusions without supporting factual evidence or specific factual assertions which are similarly baseless. Respondents specifically deny the allegations contained in paragraph twenty-eight of the Complaint.

29. Upon information and belief, Respondents admit the allegations contained in paragraph twenty-nine (29) of the Complaint.

30. The allegations in paragraph thirty (30) of the Complaint are legal conclusions rather than factual assertions, and thus, no response is required. To the extent a response is required or that Plaintiff's allegations mischaracterize any aspect of the law or any legal proceeding described therein, Respondents deny the same.

31. The allegations in paragraph thirty-one (31) of the Complaint are legal conclusions rather than factual assertions, and thus, no response is required. To the extent a response is required or that Plaintiff's allegations mischaracterize any aspect of the law or any legal proceeding described therein, Respondents deny the same.

CLAIM ONE
UNLAWFUL USE OF CAMPAIGN CONTRIBUTIONS
(C.R.S. § 1-45-106(i)(a)(II))

32. Paragraph thirty-two (32) of the Complaint is a restatement of prior allegations by reference. Accordingly, Respondents incorporate their answers or responses to each of those allegations set forth above. To any extent the re-allegations require a separate answer, those restated allegations are denied.

33. The allegations contained in paragraph thirty-three (33) of the Complaint are denied.
34. The allegations contained in paragraph thirty-four (34) of the Complaint are denied.
35. The allegations contained in paragraph thirty-five (35) of the Complaint are denied.
36. The allegations contained in paragraph thirty-six (36) of the Complaint are denied.

The paragraph entitled “PRAYER FOR RELIEF,” is indeed a prayer for relief, and therefore requires no response. To the extent any further response is required, Respondents deny the same and all allegations contained therein.

AFFIRMATIVE DEFENSES

First Affirmative Defense

The Complaint fails to state a cause of action upon which relief can be granted.

Second Affirmative Defense

Petitioner’s claims are time-barred.

Third Affirmative Defense

Petitioner’s claims are barred by the applicable statute of limitations, the Colorado Rules of Civil Procedure, or Colorado Statutory Law, including, but not limited to, proper notice to Defendant and that Defendant has been afforded her due process.

Fourth Affirmative Defense

Petitioner’s claims are barred by the legal or equitable doctrines (separately or together) of estoppel, laches, waiver, unclean hands, and balancing of the equities.

Fifth Affirmative Defense

Respondents specifically reserve the right to designate additional affirmative defenses as they become known to Respondents during the course of the litigation of this matter.


VIII. PRAYER FOR RELIEF

WHEREFORE, having fully responded to Petitioner’s Complaint, Respondents respectfully request dismissal of all of Petitioner’s claims, judgment in Respondents’ favor, plus costs, attorney fees, and such other and further relief, including all means of legal and equitable relief, as the Court deems just and proper.

Respondents specifically request an award of attorney fees as authorized by statute in this matter.

RESPECTFULLY SUBMITTED this 9th day of June, 2026.

SINNETT LAW OFFICE, LLC

By: 
Russell W. Sinnett, #32723
Attorneys for Defendant Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of June, 2026, a true and correct copy of the above and foregoing **RESPONDENTS' ANSWER** was electronically filed with the Court and served upon all counsel via ICCES or addressed to:

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