

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. 2026 AHO 13 CPF

ED Case No. 2025-44

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

GREELEY DESERVES BETTER,

Respondent.

MOTION TO CONSOLIDATE

The Elections Division of the Secretary of State and Greeley Deserves Better hereby move to consolidate this action into Case No. 2026 AHO 17 CPF, *Elections Division v. We are Greeley et al.* As good cause, the Parties state:

1. This action involves activity undertaken by a registered issue committee, Greeley Deserves Better, in late-2025 and early-2026. The activity relates to a project in the City of Greeley, which was the subject of proposed ballot measures—one in 2025, and another in 2026.

2. On May 8, 2026, the Division initiated this action against Greeley Deserves Better. On June 8, 2026, Greeley Deserves Better filed an Answer to the Complaint. The case is currently set for hearing on July 7, 2026.

3. On June 5, 2026, the Division filed an Administrative Complaint against We Are Greeley and Greeley Demands Better. That case is Case No. 2026 AHO 17 CPF. In its Complaint, the Division alleges that We Are Greeley, Greeley Deserves Better, and Greeley Demands Better are closely related entities.

4. On June 8, 2026, the Hearing Officer entered a Scheduling Order in the *We Are Greeley* matter, pursuant to which that matter is set for hearing on August 4, 2026.

5. The Parties have conferred about the claims and defenses raised in the two actions and agree that consolidation is appropriate. Consolidating the two cases will realize significant efficiencies at the ultimate hearing and ensure uniformity in the development of facts common to both Complaints.

6. First, Greeley Deserves Better, Greeley Demands Better, and We Are Greeley are all represented by the same counsel. Thus, counsel for the two cases is identical. Based on their conferrals, counsel for the Parties agree that consolidation will reduce the overall time and resources, including state resources, that will need to be devoted to these matters. Counsel also agree that consolidating the Complaints—effectively adding Greeley Deserves Better as a Respondent to the second complaint and incorporating the allegations from the first complaint into the second—will result in a more streamlined proceeding rather than increase confusion.

7. This is because the two cases arise from a similar set of operative facts. Specifically, both cases involve the City of Greeley’s efforts to facilitate the development of a proposed mixed-use development in West Greeley, and Respondents’ actions to oppose the City’s efforts. The underlying facts related to the City of Greeley’s efforts and the ensuing procedural steps that led to first one, and then another, ballot measure are relevant to both claims. *Compare Elections Division v. Greeley Deserves Better*, Compl. ¶¶ 10-19 with *Elections Division v. We Are Greeley*, Compl. ¶¶ 11-19.

8. Third, the third-party complainants in both cases are represented by the same counsel, as referenced in the certificates of service attached to both Complaints.

9. Finally, the Parties may need testimony from the same witnesses in both Complaints. These witnesses may include not only agents and representatives of the Parties, but also third parties including perhaps public officials from the City of Greeley. To minimize the burden on these witnesses, these two matters should be consolidated so that their testimony may be presented in a single hearing.

10. Moreover, the Hearing Officer will benefit from a single presentation of the operative facts relevant to both Complaints, and a single proceeding will minimize the potential for conflicting factual findings relating to identical, relevant, events.

Accordingly, the Parties respectively request that this action be consolidated into 2026 AHO 17 CPF, such that the claims and defenses raised in these two actions can be presented in a single proceeding.

Respectfully submitted this 17th 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, 6th Floor
Denver, Colorado 80203
Telephone: 720-508-6152
Fax: 720-508-6041
peter.baumann@coag.gov
*Counsel of Record for Complainant

/s/ Suzanne Taheri
Suzanne Taheri
Reg. No. 23411
Counsel to Greeley Deserves Better,
Greeley Demands Better and We are
Greeley
st@westglp.com

CERTIFICATE OF SERVICE

This is to certify that I will cause the foregoing to be served this 17th day of June, 2026, by email and/or U.S. mail, addressed as follows:

Greeley Deserves Better
C/O Attorney Suzanne Taheri
6501 E. Belleview Ave. Suite 375
Denver, CO 80111
st@westglp.com
Respondent

Greeley Forward
C/O Attorney Christopher Beall
1600 Stout St. Suite 1400
Denver, CO 80202
christopher@rklawpc.com
Third-Party Complainant

/s/ Peter G. Baumann