#### November 7, 2022

Hon. Jena Griswold Colorado Secretary of State Campaign Finance Enforcement 1700 Broadway, Suite 550 Denver, CO 90290 CPFcomplaints@ColoradoSOS.gov

Re: Campaign Finance Complaint Against Rep. Colin Larson, Colin for Colorado, Restore Colorado Leadership Fund (527), Restore Colorado Leadership Fund IEC, Frank McNulty, Square State Strategy Group, LLC, Daniel Cole, Cole Communications, and Victors Canvassing

### Dear Secretary Griswold:

Pursuant to Colo. Const. Art. XXVIII, Sec. 9(2) & 10, C.R.S. Sec 1-45-111.7, and 8 CCR 1505-6 Rule 23 pertaining to violations, complaints and sanctions, and 8 CCR 1505-6 Rule 21 pertaining to the prohibition of improper coordination, Marcie Little ("Complainant") submits the following campaign finance complaint against Rep. Colin Larson, Colin for Colorado, Restore Colorado Leadership Fund (527), Restore Colorado Leadership Fund IEC, Frank McNulty, Square State Strategy Group, LLC, Daniel Cole, Cole Communications, and Victors Canvassing ("Respondents").

- 1. The late Rep. Hugh McKean was the elected representative for Colorado House District 51 during the 71st, 72nd, and 73rd General Assemblies and served as the Republican House Minority Leader during the 73rd General Assembly.
- 2. Rep. McKean created the Restore Colorado Leadership Fund as a 527 political organization ("Restore 527"). Exhibit 1.
- 3. Rep. McKean created the Restore Colorado Leadership Fund IEC as an Independent Expenditure Committee ("Restore IEC"). <u>Exhibit 1</u>.
- 4. Rep. McKean created the Restore Colorado Leadership Fund 501(c)(4) as a non-profit organization ("Restore 501(c)(4)"). Exhibit 1.
- 5. Rep. McKean created these organizations to work in concert with one another to fundraise money and spend in elections for the benefit of certain Colorado House Republican nominees in the 2022 election cycle. Exhibit 1.

- 6. Square State Strategy Group ("Square State"), is a "full service corporate and campaign firm," managed by attorney and former Speaker of the Colorado House, Frank McNulty.
- 7. Cole Communications and Victor's Canvassing are two political consulting and campaign companies owned and operated by Daniel Cole.
- 8. Rep. Colin Larson is currently the elected representative for Colorado House District 22 and controls at least Restore 527 & Restore IEC as indicated in paragraph 20.
- 9. Colin for Colorado is the official candidate committee for Rep. Colin Larson.
- 10. According to records submitted to the Colorado Secretary of State posted on the TRACER website, numerous 2022 House candidates and/or candidates committees have contracted with Square State for services, including: Colin Larson, Jaylen Mosqueira, Savannah Wolfson, Dave Woolever, and Dan Montoya. Exhibit 2.
- 11. According to records submitted to the Colorado Secretary of State posted on the TRACER website, Restore 527 contracted with Square State for services. Exhibit 2.
- 12. According to records submitted to the Colorado Secretary of State posted on the TRACER website, Restore 527 repeatedly transferred money to Restore IEC. Exhibit 3.
- 13. According to records submitted to the Secretary of State posted on the TRACER website, numerous 2022 House candidates and/or candidates committees who contracted with Square State for services, also benefited from Restore IEC electioneering spending. Those candidates include: Colin Larson, Jaylen Mosqueira, Savannah Wolfson, Dave Woolever, and Dan Montoya. Exhibit 4.
- 14. According to records submitted to the Colorado Secretary of State posted on the TRACER website, Restore 527 contracted with Daniel Cole, through Cole Communications, for services. Exhibit 5.
- 15. According to records submitted to the Colorado Secretary of State posted on the TRACER website, Daniel Cole, through Victor's Canvassing, was contracted by a third party or parties to campaign in numerous legislative districts on behalf of various House & Senate candidates, including on behalf of all of the candidates in paragraph

- 13 above who benefited from the electioneering spending. See United for Colorado IEC contributions in Exhibit 6.
- 16. In an email from Rep. Larson on November 2, 2022, discussing permitted invitees to a zoom call, he explained "the zoom call that took place last night was with candidates who have been participating in the campaign program being run by Hugh Mckean, former speaker Mcnulty and others…." Exhibit 7.
- 17. As confirmed by Rep. Larson, the zoom call on November 2, 2022, was a private meeting that included McNulty and the candidates referenced in paragraph 13 to discuss non-public information (information about how the "campaign program" coordination efforts would continue for those select candidates after the sudden passing of Rep. McKean). Rep. Larson also confirms that not every House GOP nominee was invited to participate. Exhibit 7.
- 18. Rep. Dave Williams is the current elected representative for House District 15.
- 19. On November 4, 2022, Rep. Williams posted an update to his constituents from the outcome of another meeting relating to the "fallout from the tragic and sudden death of Rep. Hugh McKean." Exhibit 8.
- 20. In his update, Rep. Williams noted that Rep. Larson controls the "House GOP 527/IEC" and that "presumably the other consultants brought on to advise in implementing the McKean/Larson campaign plan. Larson will continue to oversee the strategy for the election." Exhibit 8.
- 21. Axiom Strategies ("Axiom"), based in Kansas City, Missouri, is one of the largest Republican political strategy firms in the country. (See axiomstrategies.com.)
- 22. Ready Colorado Action Fund ("Ready Colorado") is a Colorado based IEC formed to support "conservative candidates working to improve education in colorado." See readycoloaction.org.
- 23. According to records submitted to the Colorado Secretary of State posted on the TRACER website, Ready Colorado reported two payments of \$8,882.00 on 10/25/22 made to Axiom to support the defeat of Rep. Larson's current Democratic challenger, Tammy Story.
- 24. According to records submitted to the Colorado Secretary of State posted on the TRACER website, Restore IEC (with funds controlled by Rep. Larson) reported two

- payments of the exact same amount to the same firm on 10/26/22 with the same stated purpose of defeating his opponent, Tammy Story.
- 25. According to records submitted to the Colorado Secretary of State posted on the TRACER website, Restore Colorado IEC then attempted to "amend" the TRACER record shortly thereafter to "delete" or "offset" the evidence of those two payments.
- 26. According to records submitted to the Colorado Secretary of State posted on the TRACER website, the \$8,882.00 is a unique amount, not a standard charge, as evidenced by payments made at the same time by Restore IEC to the same firm to support the other candidates participating in the "campaign program."
- 27. The implication, however, is clear. Rep. Larson knew of the two \$8,882.00 payments that needed to be made to Axiom to support his campaign. He was supposed to let Ready Colorado (an IEC) pay for the effort (presumably to conceal his involvement), but he made a mistake, paying for it out of the IEC funds that he controls.
- 28. Rep Larson, realizing his mistake, attempted to cover the evidence of his coordination by submitting equal deductions, identifying them as an offset intended to represent a "deletion", but with TRACER, he was unable to delete the entries from the record entirely.
- 29. While two IEC committees can coordinate with each other, it's not lawful for those IEC committees to do so with the candidate who is benefiting from their expenditures because it is impossible for a candidate to "firewall" non-public information about his own campaign from himself.
- 30. As demonstrated in paragraphs 21-28, it's impossible for Rep. Larson, Restore IEC, or Ready Colorado to have a proper firewall in place as they coordinate together to electioneer on behalf of Rep. Larson's own candidacy and against his own opponent.
- 31. These TRACER entries represent one example of the larger coordinated effort, involving non-public information across select campaigns as part of what Rep. Larson called a "campaign program."
- 32.8 CCR 1505-6 Rule 21 prohibits coordination by 527's, IEC's and 501(c)(4)'s with a candidate or a candidate's campaign.
- 33. While the use of common consultants is permissible in some circumstances, 8 CCR 1505-6 Rule 21.1.4 requires that any "common consultant" maintain "effective

- barriers to the transmission of non-public information" to ensure there is no prohibited coordination.
- 34. Per Rep. Larson's email, Rep. McKean and Frank McNulty were all coordinating a "campaign program." The Tracer records bear this out with funds transferred between the groups and from campaigns to common consultants, both Square State and Daniel Cole's firms.
- 35. Rep. Larson admitted during the meeting with Rep. Williams and others that he controls the Restore 527/IEC funds, some of which include expenditures paid to McNulty's Square State firm.
- 36. Rep. Larson is also currently a candidate for House District 25, and has separately benefited from Restore IEC spending, while also contracting with Square State (which itself is engaged by Restore 527) for his own campaign services.
- 37. Between Daniel Cole's firms, Cole has been paid expenditures by Restore 527 while at the same time electioneering for some of the same candidates also contracting with Square State (which again is engaged by Restore 527).
- 38. Following from Rep. Larson's email, Restore 527 pays Square State for a "campaign program." Rep. Larson, managing those funds, is coordinating those efforts with McNulty.
- 39. Rep. Larson, through his campaign and Restore 527, McNulty through Square State and Cole through his firms are coordinating campaign efforts with campaigns listed in paragraph 13 and possibly others as a part of an overall "campaign program" in violation of campaign finance laws.
- 40. As interpreted on page 15 of the Secretary of States' Campaign and Political Finance Manual, "Expenditures controlled by or coordinated with a candidate or a candidate's agent represent both contributions by the person making the expenditure, and expenditures by the candidate committee."
- 41. Consequently, the Respondents violated 8 CCR 1505-6 Rule 21 regarding campaign finance laws and regulations, and violating those provisions for coordination also invariably include violations of campaign contributions and filing requirements, which further propel the public mistrust of "Dark Money" unduly influencing the outcomes of fair elections.

42. In accordance with Colo. Const. Art. XXVIII, Sec. 10, C.R.S. 1-45-111.5(1.5), 8 CCR 1505-6 Rule 23.3.3 & 23.3.4, 23.3.5, the Complainant requests that the Secretary of State seek to have an administrative law judge order monetary fines, all necessary specific actions and consider all factors as appropriate to reach a just and equitable outcome, including fines for failure to file complete and accurate reports (for contributions and expenditures from improper coordinated campaign activities), acceptance and use of prohibited contributions, donations and expenditures, and other violations of campaign and political finance laws and regulations.

WHEREFORE, Complainant respectfully requests all remedies pursuant to Colorado law in keeping with the interests of justice, including appropriate penalties, disclosures and such additional relief as may be deemed appropriate.

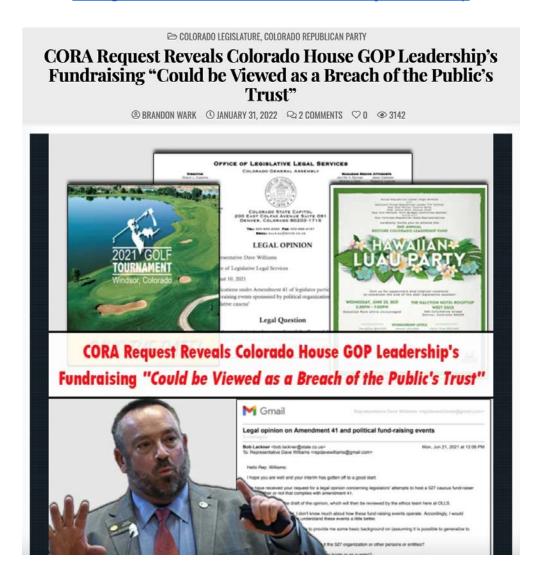
Respectfully Submitted,

Marcie Little Colorado Citizen & Voter

# Restore Colorado Leadership Creation and History

Below is a link to an article that details the formation of Restore Colorado Leadership and potential Amendment 41 Violations associated with it.

https://freestatecolorado.com/cora-request-reveals-colorado-house-gop-leaderships-fund raising-could-be-viewed-as-a-breach-of-the-publics-trust/



# McNulty (Square State) & Restore Colorado Leadership Connection: Hard & Soft Side

Tracer shows that GOP House candidates who have benefited from Restore Colorado Leadership are connected by Frank McNulty. Colorado law prohibits campaigns and third-party groups, like 527's or IECs, from coordinating together.

Payee	City, State	Expenditure Type	Amount	<u>Date</u> ▼	Candidate/Committee Name	Ind.	Elec.	
SQUARE STATE STRATEGY GROUP	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$500.00	10/13/2022	FRIZELL FOR 45 COMMITTEE	No	No	View
SQUARE STATE	HIGHLANDS RANCH, CO	Other	\$1,000.00	10/05/2022	JAYLEN FOR COLORADO		No	View
SQUARE STATE	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$2,500.00	10/03/2022	COMMITTEE FOR DAN MONTOYA	No	No	View
SQUARE STATE STRATEGY GROUP LLC	DENVER, CO	Consultant & Professional Services	\$500.00	09/20/2022	DAVE WOOLEVER FOR HD 61	No	No	View
SQUARE STATE STRATEGY GROUP	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$500.00	09/09/2022	FRIZELL FOR 45 COMMITTEE	No	No	View
SQUARE STATE	DENVER, CO	Consultant & Professional Services	\$1,000.00	09/09/2022	SAVANNAH WOLFSON FOR COLORADO	No	No	View
SQUARE STATE STRATEGY	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$500.00	09/07/2022	COLIN FOR COLORADO	No	No	View
SQUARE STATE POLITICAL CONSULTING	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$500.00	09/06/2022	KEVIN FOR COLORADO HOUSE	No	No	View
SQUARE STATE STRATEGY GROUP	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$500.00	09/06/2022	COMMITTEE TO ELECT BILL PATTERSON	No	No	View
SQUARE STATE STRATEGY	HIGHLANDS RANCH, CO	Other	\$500.00	09/03/2022	ROSE FOR COLORADO	No	No	View
Payee	City, State	Expenditure Type	Amount	Date ▼	Candidate/Committee Name	Ind	Flec	
SQUARE STATE POLITICAL	HIGHLANDS	Consultant &			KEVIN FOR COLORADO	1110	LIGO.	Rosa -
CONSULTING	RANCH, CO	Professional Services	\$500.00	09/02/2022	HOUSE	No	No	View
SQUARE STATE STRATEGY GROUP	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$5,000.00	08/24/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
SQUARE STATE	HIGHLANDS RANCH, CO	Other	\$500.00	08/04/2022	JAYLEN FOR COLORADO	No	No	View
SQUARE STATE STRATEGY GROUP	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$500.00	08/02/2022	FRIZELL FOR 45 COMMITTEE	No	No	View
SQUARE STATE STRATEGY GROUP	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$5,000.00	07/22/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
SQUARE STATE	HIGHLANDS RANCH, CO	Other	\$500.00	07/20/2022	JAYLEN FOR COLORADO	No	No	View
SQUARE STATE STRATEGY	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$500.00	07/19/2022	COLIN FOR COLORADO	No	No	View
SQUARE STATE STRATEGY GROUP LLC	SI CONTRACTOR OF THE PROPERTY	Consultant & Professional Services	\$500.00	07/13/2022	DAVE WOOLEVER FOR HD 61	No	No	View
SQUARE STATE STRATEGY	HIGHLANDS RANCH, CO	Other	\$1,500.00	07/12/2022	ROSE FOR COLORADO	No	No	View
SQUARE STATE STRATEGY GROUP	HIGHLANDS RANCH, CO	Consultant & Professional Services	\$5,000.00	06/21/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
Payee	City, State	Expenditure Type	Amount	Date ▼	Candidate/Committee Name	Ind.	Elec.	
SQUARE STATE	HIGHLANDS	Consultant & Professional Services	\$5,000.00	06/21/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View

# Restore Colorado Leadership Fund 527 money transfers to IEC

Example screenshots below. These transfers have occurred throughout the year.

<u>Payee</u>	City, State	Expenditure Type	Amount	<u>Date</u> ▼	Candidate/Committee Name	Ind.	Elec	•
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER, CO	Donation for Independent Expenditures	\$6,902.00	10/19/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER,	Donation for Independent Expenditures	\$23,199.00	10/26/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER,	Donation for Independent Expenditures	\$25,037.00	10/26/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER, CO	Donation for Independent Expenditures	\$21,848.00	10/26/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER,	Donation for Independent Expenditures	\$9,094.00	10/20/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER,	Donation for Independent Expenditures	\$50,000.00	10/19/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER,	Donation for Independent Expenditures	\$10,000.00	10/19/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER,	Donation for Independent Expenditures	\$57,279.00	10/19/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER,	Donation for Independent Expenditures	\$10,000.00	10/19/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER, CO	Donation for Independent Expenditures	\$8,319.00	10/19/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER, CO	Donation for Independent Expenditures	\$9,094.00	10/19/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER,	Donation for Independent Expenditures	\$100,000.00	10/24/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER,	Donation for Independent Expenditures	\$14,203.00	10/24/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER,	Donation for Independent Expenditures	\$20,199.00	10/24/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER, CO	Donation for Independent Expenditures	\$15,000.00	10/24/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND IEC	DENVER, CO	Donation for Independent Expenditures	\$30,000.00	10/14/202	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND	DENVER, CO	Contributions	\$8,396.00	10/12/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View
RESTORE COLORADO LEADERSHIP FUND	DENVER, CO	Contributions	\$46,793.00	10/11/2022	RESTORE COLORADO LEADERSHIP FUND	No	No	View

# Candidates who benefited from Restore Colorado IEC Spending

Example screenshots. These candidates benefited from Restore Colorado IEC spending as far back as September, possibly August. Candidates who hired Square State: Colin Larson, Jaylen Mosqueira, Savannah Wolfson, Dave Woolever, and Dan Montoya.



# **Exhibit 4- Continued**

# **Candidates who benefited from Restore Colorado IEC Spending**

Committee ID: Committee Type	20225043559	RADO LEADERSHIP FUND	IEC Report Schedule: Reporting Period: Filing Due:	OCTOBER 31, 2022 - DONATIONS AND EX 10/13/2022 - 10/26/200 10/31/2022	REPORT OF PENDITURES 22	
Exper	nditure Type: dverteing	Expense Date: 10/26/2022	Amount: \$8,882.00	Independent: Yes	Electioneering Yes	
		Disbursement Type; Monetary (Itemized)	Payment Type: Check	Payee Type; Business		
	AXIOM STRATEGIES 800 W 47TH STREET S KANSAS CITY, MO 641	JUITE 200	Dates of Commi Method of Comm	unication: 10/28/202 munication: Mailing	2-11/8/2022	
rpose:	DIRECT MAIL					
ummary:	VOTE FOR COLIN LAR	SON, OPPOSE TAMMY STO	DRY			
	ected by this Expenditu				El W. W.	
Candidate COLIN LARSON		Office COLORADO HOUSE	District HOUSE DISTRICT 25	Jurisdiction STATEWIDE	Election Year	Support, Oppose or Neutra Support
AMMY STORY	DEMOCRATION	COLORADO HOUSE	HOUSE DISTRICT 25	STATEWIDE	2022	Oppose
mmittee Type Expen	diture Type:	nditure Committee  Expense Date:	Filing Due:	48 HOUR NOTICE OF EXPENDITURE REP 10/28/2022 - 10/28/2 10/28/2022 Independent:	Electioneerin	ng:
Expen Ad	diture Type: Ivertising	Expense Date: 10/26/2022	Amount: \$12,966.00	Independent: Yes	Electioneerin Yes	ng:
		Disbursement Type: Monetary (Hemized)	Payment Type: Check	Payee Type: Business		
ryee:	AXIOM STRATEGIES 900 W 47TH STREET S KANSAS CITY, MO 641	UITE 200 12	Dates of Comm Method of Com	nunication: 10/28/20 nunication: Mailing	22-11/8/2022	
urpose: (	DIRECT MAIL					
	VOTE FOR JAYLEN MO	SQUEIRA, OPPOSE DAVID	ORTIZ			
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andidates Affe	cted by this Expenditu		Dietriet	Jurindiction	Election Voor	Support Oppose or Neutr
andidates Affe	Name Part	ty. Office	District	Jurisdiction 38 STATEWIDE	Election Year	Support, Oppose or Neutr Support
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Candidate  Candidate  VYLEN E MOSS  ANIO DANIEL C  EXPEND  Committee Name  Committee Name  Expend  Add  Add  Add  Add  Add  Add  Add	Name Par  DUERTA REPUBLIC  DEMOCR  LITURE Detai  RESTORE COLOR  20225043559 Independent Exper  diture Type:	V. Office DAN COLORADO HOUS ATIC COLORADO HOUS  ADO LEADERSHIP FUND IS dibura Commisso Expense Date: 1923/2022 Disbursement Type: Monotary (Itemizod)	INCUSE DISTRICT  Report Schedule: Reporting Period: Filing Due: Amount: 57,203,00  Payment Type:	48 HOUR NOTICE OF IN EXPENDITURE REPORT INDESSE22 - 1025/2022 Independent; Yes Payer Type: Business Section: 1028/2022-1	2022 2022 2022 DEPENDENT Electioneering: Ves	Support
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Candidates Affect Candidate AVLEN E MOSSAVID DANIEL C  EXPEND Committee Name Committee Name Expend  Expend  Committee Name Expend  Committee Name Expend  Committee Name Expend  Candidates Affect Candidates Affect Candidates Affect  Candidate	Iliture Detai  ERESTORE COLOR 20225043559 Independent Exper  ANIOM STRATECIES 800 W 47TH STREET SI GANSAS CITY, MO 8411: DIRECT MAIL  WOTE FOR SAWANNAH	V Office DAN COLORADO HOUS ATTIC COLORADO HOUS  ATTIC COLORADO HOUS  ADO LEADERSHIP FUND IE Expense Date: 10/25/20/22  Disbursement Type: Monostary (Itemizod)  ATTIC 200  St. Party  Party  Party	INCUSE DISTRICT  C Report Schedule: Reporting Period: Filing Due: Amount: 57,203,00  Payment Type: Chack  Dates of Commun. Method of Commun. HAN LUKENS	SS STATEWIDE  SS STATEWIDE  AS HOUR NOTICE OF IN DOPENITURE REVISION  1027/2022  Independent: Yes  Payer Type: Business  Junioration: Mailing  District Jurist	2022 2022  DEPENDENT  Electioneering: Yes  118/2022	Support Oppose

#### **Exhibit 4- Continued**

## Candidates who benefited from Restore Colorado IEC Spending

#### **Expenditure Detail**

mmittee Name: RESTORE COLORADO LEADERSHIP FUND IEC Report Schedule: OCTOBER 31, 2022 - REPORT OF CONATIONS AND EXPENDITURES mmittee ID: 20225043559 Reporting Period: 10132022 - 10232022 Committee ID: 20225043559
Committee Type: Independent Expenditure Committee Reporting Period: Filing Due:

Expenditure Type: Amount: \$6,864.00

> Payee Type: Business Disbursement Type: Monetary (Itemized)

AXIOM STRATEGIES 800 W 47TH STREET SUITE 200 KANSAS CITY, MO 64112 Dates of Communication: 10/19/2022-11/8/2022 Method of Communication: Mailing

Summary: VOTE FOR DAN MONTOYA, OPPOSE SHEILA LIEDER

Candidates Affected by this Expenditure:

Candidate Name	Party	Office	District	Jurisdiction	Election Year	Support, Oppose or Neutral
DAN MONTOYA	REPUBLICAN	COLORADO HOUSE	HOUSE DISTRICT 28	STATEWIDE	2022	Support
SHEILALIEDER	DEMOCRATIC	COLORADO HOUSE	HOUSE DISTRICT 28	STATEWIDE	2022	Oppose

#### **Expenditure Detail**

48 HOUR NOTICE OF INDEPENDENT EXPENDITURE REPORT 10/25/2022 - 10/25/2022 10/27/2022 RESTORE COLORADO LEADERSHIP FUND IEC Report Schedule:

20225043559 Independent Expenditure Committee Reporting Period: Filing Due:

Expenditure Type: Advertising Electioneering: Yes Amount: \$15,943.00 Independent: Yes

Disbursement Type: Monetary (femized) Payment Type: Check Payee Type: Business

AXIOM STRATEGIES 800 W 47TH STREET SUITE 200 KANSAS CITY, MO 64112

Dates of Communication: 10/26/2022-11/8/2022 Method of Communication: Mailing

DIRECT MAIL

Summary: VOTE FOR JAYLEN MOSQUEIRA, OPPOSE DAVID ORTIZ

Candidates Affected by this Expenditure: District Candidate Name Jurisdiction Election Year Support, Oppose or Neutra JAYLEN E MOSQUEIRA REPUBLICAN COLORADO HOUSE HOUSE DISTRICT 38 STATEWIDE DAVID DANIEL ORTIZ DEMOCRATIC COLORADO HOUSE HOUSE DISTRICT 38 STATEWIDE

#### **Expenditure Detail**

48 HOUR NOTICE OF INDEPENDENT EXPENDITURE REPORT 10/19/2022 - 10/19/2022 10/21/2022 RESTORE COLORADO LEADERSHIP FUND IEC Report Schedule:

Committee ID: 20225043559 Committee Type: Independent Expenditure Committee Reporting Period: Filing Due:

Expenditure Type: Advertising Expense Date: 10/19/2022

Disbursement Type: Monetary (Itemized) Payment Type: Check Payce Type: Business

mmary: VOETE FOR DAVE WOOLEVER, OPPOSE ELIZA HAMRICK

Candidates Affected by this EXP	enditure:					
Candidate Name	Party	Office	District	Jurisdiction	Election Year	Support. Oppose or Neutral
DAVE MICHAEL WOOLEVER	REPUBLICAN	COLORADO HOUSE	HOUSE DISTRICT 61	STATEWIDE	2022	Oppose
ELIZA CARNEY HAMRICK	DEMOCRATIC	COLORADO HOUSE	HOUSE DISTRICT 61	STATEWIDE	2022	Oppose

#### **Exhibit 4- Continued**

# Candidates who benefited from Restore Colorado IEC Spending

#### **Expenditure Detail**

e Name: RESTORE COLORADO LEADERSHIP FUND IEC Report Schedule: 48 HOUR NOTICE OF INDEPENDENT EXPENDITURE REPORT 10/18/2022 - 10/19/2022 10/21/2022 Committee ID: 20225043559
Committee Type: Independent Expenditure Committee Reporting Period: Filing Due:

Expenditure Type: Advertising Electioneering: Expense Date: 10/19/2022

Payment Type: Check

AXIOM STRATEGIES 800 W 47TH STREET SUITE 200 KANSAS CITY, MO 64112 Dates of Communication: 10/19/2022-11/6/2022 Method of Communication: Mailing

Summary: VOTE FOR DAN MONTOYA, OPPOSE SHELLA LIEDER

# **Expenditure Detail**

Committee Name: RESTORE COLORADO LIEADERSHIP FUND IIC Report Schedule: 48 HOUR NOTICE OF INDEPENDENT EXPENDITURE REPORT EXPENDITURE REPORT 101/2022 101/2022 101/2022 Reporting Period: Filing Due:

me Party Office District Jurisdictio
REPUBLICAN COLORADO HOUSE HOUSE DISTRICT 28 STATEWIDE
DENOCRATIC COLORADO HOUSE HOUSE DISTRICT 28 STATEWIDE

Expenditure Type: Advertising Independent: Yes

Payment Type: Check Payee Type: Business

Summary: VOTE FOR DAN MONTOYA, OPPOSE SHEILA LIEDER

#### **Expenditure Detail**

Committee Name: RESTORE COLORADO LEADERSHIP FUND IEC Report Schedule: 48 HOUR NOTICE OF INDEPENDENT EXPENDITURE REPORT COmmittee ID: 20225043459 Reporting Period: 10/14/2022 10/14/2022 10/14/2022 10/14/2022

Expenditure Type: Advertising Amount: \$8,396,00

Dates of Communication: 10/12/2022-11/9/2022 Method of Communication: Maling

DIRECT MAIL

Summary: VOTE FOR DAVE WOOLEVER, OPPOSE ELIZAHAMRICK

DAVE MICHAEL WOOLEVER REPUBLICAN COLORADO HOUSE HOUSE DISTRICT 61 STATEWIDE ELIZA GARNEY HAMRICK DEMOCRATIC COLORADO HOUSE HOUSE DISTRICT 61 STATEWIDE

# Restore Colorado 527 also Contracts with Daniel Cole

Example screenshot. Expenditures to Daniel Cole for consulting services are indicated in Tracer throughout the year.

Expendit	ure Deta	il			
Committee Name:	RESTORE COLO	RADO LEADERSHIP FUND	Report Schedule:	OCTOBER 17, 2022 - RE CONTRIBUTIONS AND EXPENDITURES	PORT OF
Committee ID: 20205039893			Reporting Period:	09/29/2022 - 10/12/2022	
Committee Type:	527 Political Orga	nization	Filing Due:	10/17/2022	
Expenditu Consultant & Profe		Expense Date: 10/11/2022	Amount: \$7,000.00	Independent: No	Electioneering: No
		Disbursement Type: Monetary (Itemized)	Payment Type: Check	Payee Type: Business	

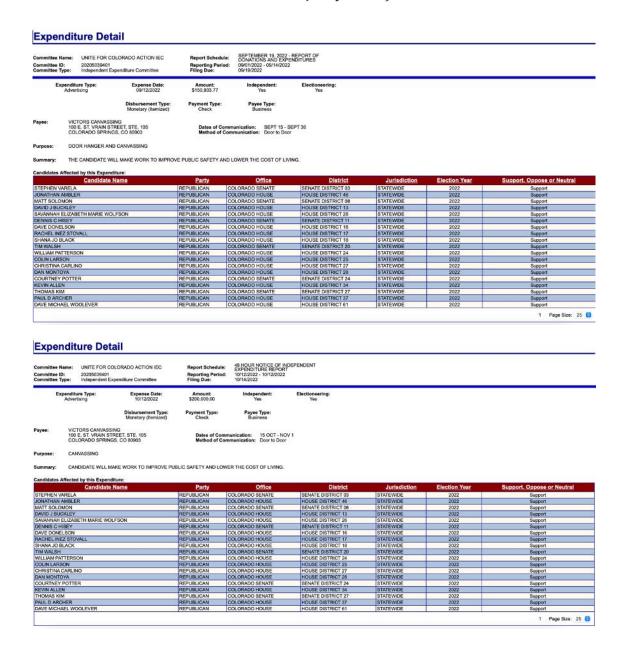
Payee:

COLE COMMUNICATIONS 100 EAST SAINT VRAINT STREET SUITE 105 COLORADO SPRINGS, CO 80903

CAMPAIGN CONSULTING Purpose:

# <u>Daniel Cole's company, Victor's Canvassing, Spending on Behalf of GOP House</u> Candidates

Example screenshot below. Daniel Cole is one of the general campaign consultants brought on by Rep. McKean and Rep. Larson to determine how to spend independent expenditure money for competitive house candidates. (Notably, Daniel Cole also consults for the GOP Senate Majority Fund.)



#### **Exhibit 6 - Continued**

# <u>Daniel Cole's company, Victor's Canvassing, Spending on Behalf of GOP House</u> Candidates

#### **Expenditure Detail** AUGUST 1, 2022 - REPORT OF DONATIONS AND EXPENDITURES 06/23/2022 - 07/27/2022 08/01/2022 Report Schedule: Reporting Period: Filing Due: UNITE FOR COLORADO ACTION IEC 20205039401 Independent Expenditure Committee Electioneering: Yes Expenditure Type: Advertising Expense Date: 07/13/2022 Amount: \$110,476.16 Disbursement Type: Monetary (Itemized) Payment Type: Check Payee Type: Business VICTORS CANVASSING 100 E. ST. VRAIN STREET, STE. 105 COLORADO SPRINGS, CO 80903 Dates of Communication: JULY 15 - AUGUST 30 Method of Communication: Door to Door CANDIDATES WILL MAKE WORK TO IMPROVE PUBLIC SAFETY AND LOWER THE COST OF LIVING. Candidates Affected by this Expenditure: Candidate Name Candidate Name STEPHEN VARELA JONATHAN AMBLER MATT SOLOMON DAMID J BUCKLEY SAMANNAH ELZABETH MARIE WOLFSON DENNIS C HISEY DAVE DOWLE ON RACHEL NEZ STOVALL SHANAJ OR JONACK TIM WALSH WILLIAM ENTERSON REPUBLICAN REPUBLICAN REPUBLICAN REPUBLICAN REPUBLICAN REPUBLICAN COLORADO SENATE COLORADO HOUSE COLORADO HOUSE COLORADO HOUSE COLORADO HOUSE COLORADO SENATE STATEWIDE STATEWIDE STATEWIDE STATEWIDE STATEWIDE STATEWIDE STATEWIDE Support Support COLORADO HOUSE COLORADO SENATE TIM WALSH WILLIAM PATTERSON COLIN LARSON CHRISTINA CARLINO DAN MONTOVA COURTNEY POTTER KEVIN ALLEN THOMAS KIM PAUL D ARCHER DAVE MICHAEL WOOLEVER REPUBLICAN COLORADO HOUSE HOUSE DISTRICT 24 HOUSE DISTRICT 25 STATEWIDE STATEWIDE HOUSE DISTRICT 25 HOUSE DISTRICT 27 HOUSE DISTRICT 28 SENATE DISTRICT 24 HOUSE DISTRICT 34 SENATE DISTRICT 37 HOUSE DISTRICT 37 HOUSE DISTRICT 61 STATEWIDE STATEWIDE STATEWIDE STATEWIDE STATEWIDE STATEWIDE STATEWIDE STATEWIDE 1 Page Size: 25 📵

# **Rep. Larson Email Confirming Coordination**

From: Colin Larson <colinforcolorado@gmail.com>
Date: November 2, 2022 at 3:24:01 PM MDT
To: pastorscottforhd15@gmail.com
Subject: Re: Confused and Concerned

Hey Scott,

Thank you for reaching out with your email. First off I am sorry that this is the first time we have had a chance to talk and get introduced, the zoom call that took place last night was with candidates who have been participating in the campaign program being run by Hugh McKean, former speaker Mcnulty and others, it was not a caucus meeting or designed to be exclusionary in anyway merely to reassure people who had been working with Hugh since his passing was so suddenly.

I am so sorry that this is how we had to get introduced but I would love to hop on a call and talk and my apologies for the misunderstanding.

My cell number is

Looking forward to to getting to know you and serving with you.

Colin Larson

# Facebook Post Confirming that Rep. Larson Controls Restore Colorado Leadership



I've been receiving many questions about what's going on in the fallout from the tragic and sudden death of Rep. Hugh McKean.

Here's what we were told and what the plan is moving forward so that the House Republicans can finish out this election cycle.

The remaining leadership members will oversee staff and ensure there's a smooth transition to the new leadership team. They are Reps. Kim Ransom, Janice Rich, and Rod Pelton.

The House GOP 527/IEC is being controlled by Rep. Colin Larson, and presumably the other consultants brought on to advise in implementing the McKean/Larson campaign plan. Larson will continue to oversee the strategy for the election.

Finally, McKean's memorial service will be on Nov. 12th in Loveland, and a ceremony where he will "lie in state" will occur at the Capitol on Nov. 10th.

Hope this answers all the questions anyone has.

# Rep. Larson Works to Conceal Coordination Between Himself, Restore IEC, and Ready **Colorado Action Fund**

<u>Payee</u>	City, State	Expenditure Type	Amount	<u>Date</u> ▼	Candidate/Committee Name	Ind.	Elec.	
AXIOM STRATEGIES	KANSAS CITY, MO	Advertising	\$8,882.00	10/26/2022	RESTORE COLORADO LEADERSHIP FUND IEC	Yes	Yes	View
AXIOM STRATEGIES	KANSAS CITY, MO	Advertising	(\$8,882.00)	10/26/2022	RESTORE COLORADO LEADERSHIP FUND IEC	Yes	Yes	View
AXIOM STRATEGIES	KANSAS CITY, MO	Advertising	(\$8,882.00)	10/26/2022	RESTORE COLORADO LEADERSHIP FUND IEC	Yes	Yes	View
AXIOM STRATEGIES	KANSAS CITY, MO	Advertising	\$8,882.00	10/26/2022	RESTORE COLORADO LEADERSHIP FUND IEC	Yes	Yes	View
AXIOM STRATEGIES	KANSAS CITY, MO	Advertising	\$8,882.00	10/25/2022	READY COLORADO ACTION FUND	Yes	Yes	View
AXIOM STRATEGIES	KANSAS CITY, MO	Advertising	\$8,882.00	10/25/2022	READY COLORADO ACTION FUND	Yes	Yes	View

# Expenditure Detail

Pavee:

Purpose:

48 HOUR NOTICE OF INDEPENDENT EXPENDITURE REPORT 10/26/2022 - 10/26/2022 10/28/2022 RESTORE COLORADO LEADERSHIP FUND IEC Report Schedule:

20225043559 Independent Expenditure Committee Committee ID: Committee Type: Reporting Period: Filing Due:

Expense Date: 10/26/2022 Independent: Yes Expenditure Type: Amount: -\$8,882.00 Electioneering: Advertising Yes

**Disbursement Type:** Payment Type: Payee Type: Business

Monetary (Itemized) Check

AXIOM STRATEGIES 10/28/2022-11/8/2022 800 W 47TH STREET SUITE 200 Dates of Communication: KANSAS CITY, MO 64112

Offset due to deletion of filed item - DIRECT MAIL Purpose:

VOTE FOR COLIN LARSON, OPPOSE TAMMY STORY Summary:

Candidates Affected by this Expenditure:

Candidate Name	Party	Office	District	Jurisdiction	Election Year	Support, Oppose or Neutral
COLIN LARSON	REPUBLICAN	COLORADO HOUSE	HOUSE DISTRICT 25	STATEWIDE	2022	Support
TAMMY STORY	DEMOCRATIC	COLORADO HOUSE	HOUSE DISTRICT 25	STATEWIDE	2022	Oppose

## **Expenditure Detail**

OCTOBER 31, 2022 - REPORT OF DONATIONS AND EXPENDITURES 10/13/2022 - 10/26/2022 10/31/2022 RESTORE COLORADO LEADERSHIP FUND IEC Report Schedule: Committee ID: Committee Type: 20225043559 Independent Expenditure Committee Reporting Period: Filing Due:

Independent: Yes **Expenditure Type: Expense Date:** Amount: **Electioneering:** 

Advertising 10/26/2022 -\$8,882.00

Disbursement Type: Monetary (Itemized) Payment Type: Payee Type: Business

AXIOM STRATEGIES 800 W 47TH STREET SUITE 200 Payee: Dates of Communication: 10/28/2022-11/8/2022 Method of Communication: Mailing

KANSAS CITY, MO 64112 Offset due to deletion of filed item - DIRECT MAIL

VOTE FOR COLIN LARSON, OPPOSE TAMMY STORY Summary:

Candidates Affected by this Expenditure: Candidate Name Support, Oppose or Neutral Party Office District Jurisdiction **Election Year** COLIN LARSON TAMMY STORY REPUBLICAN COLORADO HOUSE HOUSE DISTRICT 25 STATEWIDE 2022 DEMOCRATIC COLORADO HOUSE HOUSE DISTRICT 25 STATEWIDE

#### **Exhibit 9 - Continued**

# Rep. Larson Works to Conceal Coordination Between Himself, Restore IEC, and Ready **Colorado Action Fund**

## **Expenditure Detail**

READY COLORADO ACTION FUND Report Schedule:

48 HOUR NOTICE OF INDEPENDENT EXPENDITURE REPORT 10/25/2022 - 10/25/2022 10/27/2022 Committee ID: Committee Type: 20195036604 Independent Expenditure Committee Reporting Period: Filing Due:

Expenditure Type: Advertising Expense Date: 10/25/2022 Electioneering: Yes

Disbursement Type: Monetary (Itemized) Payment Type: Check Payee Type: Business

Payee:

AXIOM STRATEGIES 1251 NW BRIARCLIFF PARKWAY, SUITE 85 KANSAS CITY, MO 64116 Dates of Communication: 10/31 Method of Communication: Mailing

MAILER IN HD25. VOTE AGAINST TAMMY STORY

Candidates Affected by this Expenditure:

Purpose:

Candidate Name	<u>Party</u>	<u>Office</u>	<u>District</u>	<u>Jurisdiction</u>	Election Year	Support, Oppose or Neutral
TAMMY STORY	DEMOCRATIC	COLORADO HOUSE	HOUSE DISTRICT 25	STATEWIDE	2022	Oppose

## **Expenditure Detail**

OCTOBER 31, 2022 - REPORT OF DONATIONS AND EXPENDITURES 10/13/2022 - 10/26/2022 10/31/2022 READY COLORADO ACTION FUND Report Schedule: Committee Name: 20195036604

Committee ID: Committee Type: Reporting Period: Filing Due: Independent Expenditure Committee

Expenditure Type: Advertising Expense Date: 10/25/2022 Independent: Yes Electioneering: Yes \$8,882.00

Payment Type: Check Disbursement Type: Monetary (Itemized) Payee Type: Business

AXIOM STRATEGIES 1251 NW BRIARCLIFF PARKWAY, SUITE 85 KANSAS CITY, MO 64116 Payee: Dates of Communication: 10/31 Method of Communication: Mailing

MAILER IN HD25. Purpose:

VOTE AGAINST TAMMY STORY

Candidates Affected by this Expenditure:

Candidate Name	<u>Party</u>	<u>Office</u>	<u>District</u>	<u>Jurisdiction</u>	Election Year	Support, Oppose or Neutral
TAMMY STORY	DEMOCRATIC	COLORADO HOUSE	HOUSE DISTRICT 25	STATEWIDE	2022	Oppose