

In re Violations of Lobbying Disclosure Requirements by Alan Philp, Frank McNulty, and Greg Brophy

Stanley Matsunaka, Complainant

**COMPLAINT FILED PURSUANT TO
COLORADO CONSTITUTION, ARTICLE V, §§ 44.2(4)(b)(III) and 48(4)(b)(III)**

Stanley Matsunaka, a registered voter of Larimer County, Colorado, hereby files this complaint based on the express constitutional authority to obtain review of lobbying registration and disclosure violations by Alan Philp, Frank McNulty, and Greg Brophy, who acted in concert on behalf of the Colorado Neighborhood Coalition to lobby redistricting commissioners without full reporting.

LEGAL BACKGROUND

1. At the 2018 general election, the voters of Colorado approved Amendments Y and Z to create the Congressional Redistricting Commission to draw district lines for Colorado's seats in the U.S. House of Representatives and the Legislative Redistricting Commission to draw district lines for members of the State Senate and State House of Representatives.
2. All members of the Congressional Redistricting Commission were appointed as of March 1, 2021.
3. The Governor convened the Congressional Redistricting Commission on or about March 15, 2021.
4. All members of the Legislative Redistricting Commission were appointed as of March 16, 2021.
5. The Governor convened the Legislative Redistricting Commission on or about March 29, 2021.
6. The Colorado Constitution requires persons who contract or are compensated to affect the decisions made by the commissions to register with the Secretary of State and to disclose their lobbying income. Colo. Const., art. V, §§ 44.2(4)(b)(III), 48(4)(b)(III).
7. The Colorado Secretary of State is authorized to adopt, and has established, rules to facilitate the lobbyist registration and reporting process, as well as for processing complaints about

noncompliant lobbyists. Colo. Const., art. V, §§ 44.2(4)(b)(III), 48(4)(b)(III). The Secretary adopted an emergency rule on March 1, 2021 for these purposes and amended the rule on May 28, 2021. *See* 8 CCR 1505-8 (Rules 1, 4, 5).

8. Under the Constitution, a person lobbies the commissions whenever that person “advocate[es] to the commission, to one or more commissioners, or to the nonpartisan staff for the adoption or rejection of any map, amendment to a map, mapping approach, or manner of compliance with any of the mapping criteria specified in section 44.3 of this article V.” *Id.*
9. Thus, a person lobbies the commissions, a group of commissioners, a single commissioner, or the nonpartisan staff by seeking to “influence” commissioners or staff about the use of any “approach” to mapping or a particular way in which the commissions or staff can “compl[y] with the mapping criteria” as set forth in the Constitution. 8 CCR 1505-8 (Rule 1.10) (person who attempts to “influence” commissioners in the exercise of “their constitutionally prescribed duties” is a “redistricting lobbyist” subject to applicable disclosure requirements).
10. The Constitution is specific that lobbyists must disclose publicly to ensure that the process is transparent and the public knows about the extent of lobbying on such critical public decisions. Colo. Const., art. V, §§ 44.2(4)(b)(III), 48(4)(b)(III).
11. Every lobbyist “must disclose to the secretary of state any compensation contracted for, compensation received, and the person or entity contracting or paying for their lobbying services.” *Id.*
12. The Constitution contains a specific timeline for the required reporting. “Such disclosure must be made no later than seventy-two hours after **the earlier of** each instance of such lobbying or any payment of such compensation.” *Id.* (emphasis added).
13. Thus, disclosures must be made within 72 hours of engaging in lobbying commissioners or staff or being compensated for such lobbying – whichever occurs first.
14. For purposes of state law, redistricting commissioners are “covered officials” as each is “a member of a... commission... which has jurisdiction over the subject matter of a... standard,” C.R.S. §§ 24-6-301(1.7)(b), (3.5)(a)(IV), given that the redistricting commissions establish mandatory standards concerning redistricting.
15. The commissions are constitutionally authorized to adopt various redistricting “standards” to which the nonpartisan staff “shall adhere” in mapping districts, “including standards... to be used to evaluate a plan’s competitiveness.” Colo. Const., art. V, §§ 44.4(3), 48.2(3).
16. In the lobbying context, “‘standard’ means a criterion measuring acceptability [or] accuracy.” 8 CCR 1505-8 (Rule 1.13). The commissions are authorized to establish standards for staff’s production of redistricting maps and measurement of

“competitiveness” are criteria to guide whether the resulting map making is “acceptab[le]” in light of pertinent legal requirements and “accura[te]” in light of previous elections.

PARTIES TO COMPLAINT

17. Stanley Matsunaka is a registered voter of Larimer County, Colorado.
18. Alan Philp, Frank McNulty, and Greg Brophy are political operatives who are working and are compensated to affect the decision making of the Congressional and Legislative Redistricting Commissions.

Colorado Neighborhood Coalition

19. Colorado Neighborhood Coalition (CNC) is a Colorado non-profit corporation that represents certain partisan interests in order to affect Congressional and state legislative redistricting.
20. CNC has one registered lobbyist, Alan Philp, who filed a single disclosure in April of this year even though that lobbyist and other staff members have been lobbying one or both commissions.

Alan Philp

21. Philp is a long-time political consultant, now doing business through his firm, Patriot Pathways LLC, including for redistricting lobbying. *See* Alan J. Philp Lobbying Registration Form (using Patriot Pathways firm name, business address, and email address).
<https://www.sos.state.co.us/lobby/RdLobbyistSummary.do?lobbyistId=20215039671>
22. Philp acknowledges publicly that he has a history of being professionally involved in redistricting, having “led Republican redistricting efforts in Colorado in 2011 and 2001.”
<https://www.leadershipinstitute.org/training/contact.cfm?FacultyID=6166325>
23. Philp has filed only one redistricting lobbyist disclosure – on April 20, 2021 – for a \$2,000 “retainer” which he said reflected his “[c]ommunications with commissioners.”
<https://www.sos.state.co.us/lobby/RdReportResults.do?quitButtonDestination=&lobbyistId=20215039671>.
24. Three months after disclosing \$2,000 in lobbying income, Philp testified before the Congressional and Legislative Redistricting Commissions, appearing at the meeting held in Lakewood, Colorado on July 20, 2021, at Lakewood Cultural Center, 470 S. Allison Parkway.

25. At that hearing, Philp spoke to and proposed legislative district maps for Jefferson County.¹
26. Philp submitted a letter and additional commentary to the Legislative Commission on July 21, 2021 by means of the Commissions' website.²
27. Philp wrote that his letter was "in response to the questions posed to me by commissioners at last night's Lakewood hearing."
https://redistricting.colorado.gov/public_comments?q%5Bcommission_eq%5D=&q%5Bbody_cont%5D=&q%5Bname_cont%5D=philp&q%5Bzip_cont%5D=&commit=Search
28. Philp filed an additional comment on the Commissions' website on July 28, 2021 which included a link to a legislative district map that contained "footprints" for 41 State House of Representatives districts in Denver, Arapahoe, Adams, Jefferson, Boulder, Weld, and Larimer Counties.
29. As represented to the commissions, Philp's "footprint" map provides contours for over 60% of the state's 65 House of Representatives districts.
30. Philp testified before the Commissions, appearing at the meeting held in Boulder, Colorado on August 11, 2021, at the University of Colorado (Center for Academic Success and Engagement).
31. Philp has sent redistricting maps to commissioners to set up his communications about redistricting. *See, e.g.*, Recording of Lakewood Hearing at 20:08:08 (commissioner to Philp: "thank you for sending me the map, just prior to this meeting").
32. Philp arranged and held a private meeting with one congressional redistricting commissioner on May 19, 2021. *See* Exhibit 1, attached hereto.
33. Philp arranged a lunch with this same commissioner and his direct supervisor to occur immediately after the meeting referred to above. *Id.*
34. The appointment on the supervisor's calendar reads, "Redistricting Discussion Lunch." *Id.*
35. Philp did not file, with the Secretary of State, a disclosure of his July 20 lobbying within 72 hours of such meeting or at all.
36. Philp did not file, with the Secretary of State, a disclosure of his July 21 lobbying within 72 hours of such meeting or at all.

¹ All Congressional and Legislative Redistricting Commission hearings are recorded and archived at: <https://redistricting.colorado.gov/content/meeting-summaries>.

² Written comments filed with the Congressional and Legislative Redistricting Commissions are available at: https://redistricting.colorado.gov/public_comments/.

37. Philp did not file, with the Secretary of State, a disclosure of his July 28 lobbying within 72 hours of such meeting or at all.
38. Philp did not file, with the Secretary of State, a disclosure of his August 11 lobbying within 72 hours of such meeting or at all.
39. Philp did not file, with the Secretary of State, a disclosure of his July and August communications with commissioners transmitting maps within 72 hours of such map transmission or at all.
40. Philp did not file, with the Secretary of State, a disclosure of his May 19 meeting with a redistricting commissioner within 72 hours of such meeting or at all.
41. Philp did not file, with the Secretary of State, a disclosure of his “Redistricting Discussion Lunch” with a redistricting commissioner and that commissioner’s supervisor within 72 hours of such meeting or at all.
42. Philp testified on July 20 that, while he lobbies for CNC, on that night, he was “speaking for myself and not on behalf of Colorado Neighborhood Coalition today.” Lakewood Hearing Recording at 20:01:48.
43. Philp stated in his July 28 correspondence that he is a lobbyist for CNC but “[b]ecause CNC has not proposed or endorsed any specific map, the mapping ideas herein are my own.”
44. Philp likewise stated in his August 11 address to the Commissions that he was testifying about preferred maps but CNC had not endorsed such maps.
45. Through public comment or otherwise, CNC has not objected to the maps and mapping approaches that Philp has advocated to the commissions.
46. Amendment Y, addressing congressional redistricting, contains no requirement that the principal of an organization endorse a map as a precondition to disclosure.
47. Amendment Z, addressing state legislative redistricting, contains no requirement that the principal of an organization endorse a map as a precondition to disclosure.
48. If Philp were correct that lobbyists need not report their lobbying because the organization they represent did not advance its own map, the lobbying disclosure mandate would be an empty one as every lobbyist would just express his “personal” opinion.
49. The Constitution does not treat as “lobbying” only the advocacy of a map or map amendment. A person lobbies by urging the commissioner to use any “mapping approach” or “manner of compliance with any of the mapping criteria specified” in the Constitution. Colo. Const., art. V, §§ 44.2(4)(b)(III), 48(4)(b)(III). An endorsement of an actual map is not required.

50. A person is a lobbyist either by having been “contracted or compensated to communicate” with one or both commissions, “including through providing public comment.” 8 CCR 1505-8 (Temporary Rule 1.9); (available online at https://content.govdelivery.com/attachments/COSOS/2021/03/01/file_attachments/1709403/20210301_Lobby_NoticeTempAdopSBSJ.pdf); 8 CCR 1505-8 (Permanent Rule 1.10).
51. Philp’s advocacy in writing and at commission hearings of mapping approaches and his recommended manner of the commission’s constitutional compliance meet that standard. Colo. Const., art. V, §§ 44.2(4)(b)(III), 48(4)(b)(III).
52. Even assuming Philp was acting without a specific map endorsement by CNC, it is unreasonable to think that Philp testified and submitted redistricting maps in a way that was inconsistent with or in any way undermined the interests of CNC. In fact, representing interests that are adverse to a lobbying client’s interests violates state law. *See* C.R.S. § 24-6-308(1)(e).
53. Regardless, a lobbyist need not be paid for a specific instance of lobbying, as a lobbyist must disclose his lobbying even when he is supposedly volunteering his time. “A person representing a client on an uncompensated basis for the purposes listed above is a redistricting commission lobbyist.” 8 CCR 1505-8 (Rule 1.10).
54. On information and belief, Philp had contracted, either in writing or verbally, to advocate for maps, mapping approaches, and/or compliance with constitutional mapping criteria before or on March 1, 2021. Philp registered with the Secretary as a redistricting lobbyist on April 20, 2021, and thus had a contract to lobby no later than that date.
55. In the Lakewood and Boulder hearings, Philp stated he was one of the “founding members” and/or authors of Amendments Y and Z, indicating his intimate familiarity with their texts which include the requirement that he disclose his compensation for lobbying. Lakewood Hearing Recording at 20:01:54; Boulder Hearing Recording at 10:13:10.

Frank McNulty

56. Frank McNulty is a lawyer and through his consulting firm, SquareState Strategy Group LLC, is retained by CNC as part of its team that seeks to affect maps and mapping approaches on congressional and state legislative districts.
57. McNulty is a former state legislator, former speaker of the Colorado House of Representatives, and thus is familiar with lobbying registration and disclosure requirements.
58. McNulty is CNC’s corporate registered agent.
59. McNulty states that he is not required to register as a lobbyist for CNC because CNC “registered a lobbyist, Philp who... will directly communicate with the commissioners.”

https://www.coloradopolitics.com/elections/redistricting-testimony-triggers-high-profile-lobbying-disclosure-questions-over-reporting-requirements/article_e724dbc0-e728-11eb-8355-1b44acc1e69d.html

60. McNulty has also stated that “others paid by the group (CNC) are doing community outreach, education and awareness.” *Id.*
61. McNulty met privately with a redistricting commissioner on May 19.
62. Specifically, McNulty joined Philp in having a “Redistricting Discussion Lunch” with that redistricting commissioner and his supervisor, the county administrator, on May 19. *See* ¶¶33-34, *supra*.
63. McNulty testified at the Highlands Ranch hearing on August 18 but did not identify himself as a representative of CNC.
64. McNulty addressed the commissions and responded to questions at the August 18 hearing.
65. McNulty advised the Legislative Commission on how to draw legislative districts, using Highway 85 as a western boundary for one house district and said it makes “more sense to pair the remainder of Highlands Ranch with Lone Tree” for another district. Highlands Ranch Hearing at 22:51:46-22:51:15.
66. McNulty advised the Congressional Commission that it made “a lot of sense” to align Douglas County “with its northern allies” in the metro area for a congressional district. Highlands Ranch Hearing at 22:52:49.
67. McNulty advised both commissions about his opinions on the best way in which to measure and apply competitiveness models arguing that a competitive district is one with a 5% differential in partisan performance. *Id.*
68. McNulty has not registered, with the Secretary of State, as a redistricting lobbyist.
69. McNulty has not filed, with the Secretary of State, a disclosure of his May 19 meeting with a commissioner within 72 hours of such meeting or at all.
70. McNulty has not filed, with the Secretary of State, a disclosure of his “Redistricting Discussion Lunch” with a redistricting commissioner and that commissioner’s supervisor within 72 hours of such meeting or at all.
71. McNulty has not filed, with the Secretary of State, a disclosure of his August 18 lobbying within 72 hours of such meeting or at all.
72. McNulty has not disclosed any of the income received for his activities in advocating mapping approaches and compliance with constitutional mapping criteria.

Greg Brophy

73. Greg Brophy is a former state representative and senator, executive director of The Western Way, and a paid consultant to CNC.
74. According to Brophy, “I am being paid by Colorado Neighborhood Coalition, but I’m not lobbying.” https://www.coloradopolitics.com/elections/redistricting-testimony-triggers-high-profile-lobbying-disclosure-questions-over-reporting-requirements/article_e724dbc0-e728-11eb-8355-1b44acc1e69d.html
75. Brophy also said of his work for CNC, “I don’t have any communications with the commissioners about the maps they’re drawing. I don’t do that.” *Id.*
76. On May 28, 2021, Brophy voluntarily appeared before a group of five Congressional Redistricting Commissioners, comprising that commission’s Public Hearing Schedule Committee. <https://sg001-harmony.sliq.net/00327/Harmony/en/PowerBrowser/PowerBrowserV2/20210401/154/11915>
77. Commissioners Brawner, Diawara, Moore, Wilkes, and Shepard Macklin participated in this hearing. <https://redistricting.colorado.gov/content/meeting-summaries> (May 28 meeting minutes available at “Public Hearing Schedule Committee 05282021.pdf”).
78. At the above-referenced Public Hearing Schedule Committee meeting, Brophy also addressed nonpartisan staff to the Commission, including but not limited to the staff director, Jessika Shipley. *Id.*
79. In that testimony, Brophy addressed the mapping approaches for multiple congressional districts, including the 1st, 2nd, 4th, and 7th districts.
80. Specifically, Brophy advocated to this group of redistricting commissioners (sitting as a committee) and to nonpartisan staff:
- (a) Denver should be its own congressional district;
 - (b) there is “no basis” for Boulder to be in a congressional district with counties on the eastern plains;
 - (c) there is “almost no reason” for Douglas County to be in the 4th Congressional District; and
 - (d) a split of Jefferson County into three congressional districts “shouldn’t happen again” when the Commission sets district lines this year.
- <https://sg001-harmony.sliq.net/00327/Harmony/en/PowerBrowser/PowerBrowserV2/20210401/154/11915> at 2:17:00; 2:16:40; 1:58:05; and 2:18:15.

81. Brophy defends his refusal to register as a lobbyist on the grounds that he is just “encouraging people to participate” and “calling it grassroots organizing.” https://www.coloradopolitics.com/elections/redistricting-testimony-triggers-high-profile-lobbying-disclosure-questions-over-reporting-requirements/article_e724dbc0-e728-11eb-8355-1b44acc1e69d.html
82. By telling commissioners how at least four congressional districts should be formed, Brophy advocated mapping approaches or how the commission could best comply with the specified mapping criteria and, therefore, was required to register as a lobbyist and disclose his lobbying income.
83. Brophy has solicited others to speak about maps, mapping approaches, and mapping criteria in a way that supports his position.
84. On or about April 21, 2021, Brophy attended a meeting of the Associated Governments of Northwest Colorado and to address the work of the redistricting commissions.
85. Brophy stated, “If you wanna have an impact...the western slope is a ‘community of interest’” and told attendees to “use those words.” <https://www.theheraldtimes.com/agnc-holds-monthly-meeting-in-meeker-several-topics-discussed/rio-blanco-county/>
86. AGNC summarized Brophy’s comments as follows: “It is important to advocate that the Western Slope is a community of interest, including Jackson and Grand Counties.” <https://agnc.org/wp-content/uploads/Approved-Minutes-4-21-2021-Meeting-1.pdf>
87. Brophy has not registered as a redistricting lobbyist.
88. Brophy has not filed, with the Secretary of State, a disclosure of his May 28 lobbying of Congressional Commission members within 72 hours of such meeting or at all.
89. Brophy has not disclosed his income from lobbying on congressional districts.
90. Even though he is not registered to lobby on redistricting matters, Brophy is registered with the Secretary of State to lobby on legislative issues for eight (8) clients and is thus familiar with lobbying registration and disclosure requirements.

Other

91. Representative Matt Soper is a sitting legislator in the Colorado House of Representatives and a candidate for reelection.
92. Soper trained his constituents on how to advocate for legislative districts on the Western Slope. https://www.coloradopolitics.com/legislature/incumbent-lawmaker-coached-public-testimony-for-redistricting-hearings-to-protect-his-seat/article_0d10eb27-6d07-5779-bbdf-fc687799eaa3.html

93. Soper told constituents that Philp, McNulty, and Brophy were retained by the Colorado Republican Party and/or its state legislative political committees to lobby the commissions to obtain favorable Republican maps. “The Colorado Republican Party, the House Republicans and Senate Republicans, hired Alan Philp, Greg Brophy and Frank McNulty to represent our interests.” *Id.* (statement of Rep. Matt Soper).
94. Despite the clarity of his earlier understanding, once Soper’s meeting with local supporters was reported in the press, Soper stated he must have been wrong. *Id.*
95. After Soper’s meeting with local supporters was reported in the press, Philp was “upset that Soper said that Colorado Neighborhood Coalition’s efforts were paid to represent Republican interests in redistricting.” *Id.*
96. After Soper’s meeting with local supporters was reported in the press, “McNulty also said Soper was incorrect on the payment arrangement,” and Philp joined him in that denial. *Id.*

FIRST CLAIM
(McNulty and Brophy Failed to Register as Lobbyists)

97. All preceding allegations are adopted for purposes of the First Claim.
98. McNulty and Brophy met with one or more redistricting commissioners to address redistricting maps, mapping approaches, and mapping criteria.
99. McNulty and Brophy were redistricting lobbyists. 8 CCR 1505-8 (Rule 1.10).
100. McNulty and Brophy were required to register as redistricting lobbyists. *Id.* (Rule 4.1).
101. Their failure to register is a violation of the Colorado Constitution.
102. Their failure to register is a violation of lobbyist disclosure rules adopted by the Colorado Secretary of State.

SECOND CLAIM
(Philp, McNulty, and Brophy Failed to Disclose Income from Lobbying)

103. All preceding allegations are adopted for purposes of the Second Claim.
104. Philp, McNulty, and Brophy met with one or more redistricting commissioners to address redistricting maps, mapping approaches, and mapping criteria.
105. Philp, McNulty, and Brophy therefore acted and qualified as redistricting lobbyists.
106. Philp, McNulty, and Brophy were required to disclose redistricting lobbying income within 72 hours of the earlier of each instance of lobbying or the receipt of income. 8 CCR 1505-8 (Rule 4.2).

107. Because they made no such disclosures, their failures are violations of the Colorado Constitution.

108. These failures to disclose are violations of lobbyist disclosure rules adopted by the Colorado Secretary of State.

THIRD CLAIM
(Compensation of Lobbyists Who Are Not Registered to Lobby)

109. All preceding allegations are adopted for purposes of the Third Claim.

110. McNulty and Brophy are not registered to lobby the redistricting commissions.

111. McNulty and Brophy lobbied the commissions anyway.

112. It is unlawful for any “person engaged in lobbying” to “[e]mploy, subcontract, or pay compensation to a person for lobbying who has not registered to lobby.” C.R.S. § 24-6-308(1)(m).

113. CNC is a “corporation” and thus a “person” under lobbying registration and reporting statutes. C.R.S. § 24-6-301(4).

114. Philp, McNulty, and Brophy is each an “individual” thus a “person” under lobbying registration and reporting statutes. *Id.*

115. The Secretary of State’s rules incorporate by reference the state lobbying statute, C.R.S. § 24-6-301, *et seq.* See 8 CCR 1505-8 (Rule 4.3, adopting potential violations and complaint process in statute, per Rules 5.3.1(a), 5.3.2(a), 5.6.1(a), 5.6.2(e), (f)).

116. CNC, McNulty, as CNC’s registered agent, or Philp, as CNC’s registered lobbyist, or all of them, paid or authorized payment to McNulty and Brophy for their lobbying activities even though McNulty and Brophy were not registered to lobby in violation of the applicable law.

REQUEST FOR RELIEF

In light of the above factual allegations and claims for relief, the Secretary of State should:

- A. Conduct the review required by 8 CCR 1505-8 (Rule 5.3.1) within 21 days to assess the facts and violations set forth in this Complaint as well as an investigation within 28 days by the Lobbying Division as authorized by 8 CCR 1505-8 (Rule 5.5);
- B. Refer this complaint for review and decision by an administrative law judge;

- C. Order McNulty and Brophy to file truthful and complete registrations as redistricting lobbyists;
- D. Order Philp, McNulty, and Brophy to file truthful and complete reports of all lobbying of redistricting commissioners, commissions, and staff;
- E. Order Philp, McNulty, and Brophy to file truthful and complete reports of all lobbying income each has received, directly or through the firms for which they work that may have contracted with CNC.
- F. Impose the penalties on Philp, McNulty, and Brophy that are authorized by law, *see* 8 CCR 1505-8 (Rule 5.6);
- G. Upon any continued refusal to comply by Philp, McNulty, or Brophy, or any combination of them, initiate such action in district court as is necessary to enjoin the acts and enforce compliance with lobbyist registration and disclosure requirements, *see* 8 CCR 1505-8 (Rule 5.6.2(e)) and C.R.S. § 24-6-309(2); and
- H. Grant such other relief as is warranted by the facts and the law of this matter.

Respectfully submitted this 24th day of August, 2021.

s/ Mark G. Grueskin
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CERTIFICATE OF SERVICE

I, Erin Holweger, hereby affirm that a true and accurate copy of the **COMPLAINT FILED PURSUANT TO COLORADO CONSTITUTION, ARTICLE V, SECTIONS §§ 44.2(4)(b)(III) and 48(4)(b)(III)** was sent electronically and via U.S. Postal Service, first class, postage prepaid, this day, August 24, 2021, to the following:

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