

ATTACHMENT A - LIST OF ELECTION COMPLAINTS SINCE 2019

Date Filed	Complainant	Respondent	Complaint Type	Details of Complaint	Result
November 2023 Election					
11/6/2023	Robbie Moreland	Emily Francis	Disclosure of Campaign Expense	Failure to provide "paid for by" on campaign materials	Cured
11/6/2023	Robbie Moreland	Patricia Babbitt	Disclosure of Campaign Expense	Failure to provide "paid for by" on campaign materials	Cured
11/6/2023	Cathy Kipp	Patricia Babbitt	Disclosure of Campaign Expense	Failure to provide "paid for by" on campaign materials	Cured
12/13/2023	Robbie Moreland	Alexander Adams	Financial	Incorrect Campaign Finance Report Totals	Cured
12/11/2023	Sean McCoy	PFC Action	Financial	GoFundMe.com Petition	No probable cause exists.
November 2022 Election					
7/11/2022	Steve Lucas	Ranked Choice Voting Fort Collins	Registration	Failure to register as an Issues Committee	Cured
7/19/2022	Steve Lucas	Better Ballot and RCV Fort Collins	Financial	Donate button on RCV website takes user to Better Ballots.	Cured
8/22/2022	Robbie Moreland	Unidentified registrant using GoDaddy	Disclosure of Campaign Expense	Failure to provide "paid for by" on campaign materials	Registrant never identified.
11/3/2022	Jody Deschenes	Community for Fair Elections	Disclosure of Campaign Expense	Failure to provide "paid for by" on campaign materials	Unknown
April 2021 Election					
1/27/2021	Michael Pruznik	Susan Gutowsky	Form Completion	1. 2021 Registration Form was not signed. 2. Contributions received prior to signing should be considered null and void.	Cured
1/27/2021	Michael Pruznik	Susan Gutowsky	Form Completion	1. 2021 Candidate Affidavit did not identify the District or the election date. 2. The domain name was incorrect for the website. 3. Gutowsky should be disqualified.	Cured
3/5/2021	Jennifer Litzau	Citizens for a Sustainable Economy	Disclosure of Campaign Expense	1. Series of text messages sent do not include a paid for by disclosure. 2. CSE failed to provide an IEC registration. 3. CSE failed to provide and IE filing.	No probable cause exists.
3/9/2021	Robbie Moreland	Jeff Hansen	Financial	1. Failure to attribute contributions from LLCs to individual members of the LLCs in March 3, 2021 campaign report.	Cured
3/16/2021	Robbie Moreland	BlueFlower Action IE Committee	Registration	1. Entity should be registered as a political committee.	No probable cause exists.
3/16/2021	Robbie Moreland	Citizens for a Sustainable Economy	Financial/Disclosure of Campaign Expense	1. Failed to file an independent expenditure report for texts. 2. Failed to include paid for by statements on texts.	No probable cause exists.
3/17/2021	Robbie Moreland	Miller/Grant/Meurer	Registration	1. Three persons associated with expenditure should have filed as an Issue Committee versus doing an Independent Expenditure.	Cured
3/23/2021	Robbie Moreland	Molly Skold	Disclosure of Campaign Expense	1. Paid for by statements were not provided on robotexts that were sent.	Municipal Court
3/24/2021	Robbie Moreland	Citizens for a Sustainable Economy	Financial	1. Robotext chain done jointly with Stand With CSU was not accounted for as an independent expenditure or part of an Issue Committee Expense.	No probable cause exists.
3/24/2021	Robbie Moreland	BlueFlower Action IE Committee	Registration	1. Should be registered as a Political Committee versus filing independent expenditures.	No probable cause exists.
3/30/2021	Robbie Moreland	BlueFlower Action IE Committee	Registration	1. Should be registered as a Political Committee versus filing independent expenditures.	No probable cause exists.
4/15/2021	Robbie Moreland	Molly Skold	Financial	1. Did not report an expenditure for the voter contact list from the Larimer Republican Party. Voter list is considered a "valuable thing."	Municipal Court
November 2020 Election - None					
November 2019 Election - None					
April 2019 Election					
3/8/2019	Marge Norskog	Susan Holmes	Financial	1. Reported contribution by Susan Holmes does not include the date the contribution was accepted 2. Reported contribution in kind does not include an address of contributor or the date the contribution was accepted.	No probable cause exists.
3/8/2019	Marge Norskog	Fort Collins Full Time Council	Financial	1. Reported contributions do not include address of a single contributor	Probable cause exists; circumstances do not warrant prosecution.
3/8/2019	Marge Norskog	Fred Kirsch for Fort Collins District 6	Financial	1. Reported contributions do not include addresses of contributors	Probable cause exists; circumstances do not warrant prosecution.
3/8/2019	Marge Norskog	Committee to Elect Noah Hutchison	Disclosure of Campaign Expense	1. Candidate's personal Facebook page is promoting campaign without "paid for by" statement 2. Candidate's campaign Twitter page does not include "paid for by" statement	No probable cause exists.
3/8/2019	Marge Norskog	Julie for FC	Disclosure of Campaign Expense	1. Personal Facebook page is promoting campaign without "paid for by" statement	No probable cause exists.
3/8/2019	Marge Norskog	Elect Emily	Disclosure of Campaign Expense	1. Candidate's campaign website does not include "paid for by" statement 2. Candidate's personal Facebook page is promoting campaign without "paid for by" statement	1. Probable cause exists; circumstances do not warrant prosecution. 2. No probable cause exists.
3/8/2019	Marge Norskog	Adam 4 Fort Collins	Disclosure of Campaign Expense	1. Candidate's campaign website does not include "paid for by" statement 2. Candidate's personal Facebook page is promoting campaign without "paid for by" statement	1. Probable cause exists; circumstances do not warrant prosecution. 2. No probable cause exists.
3/8/2019	Marge Norskog	Fort Collins Full Time Council	Disclosure of Campaign Expense	1. Issue website does not include "paid for by" statement 2. Issue's Facebook page is promoting ballot issue without "paid for by" statement	No probable cause exists.
3/8/2019	Marge Norskog	Fred Kirsch for Fort Collins District 6	Disclosure of Campaign Expense	1. Candidate's campaign website does not include "paid for by" statement 2. Candidate's personal Facebook page is promoting campaign without "paid for by" statement	No probable cause exists.
3/8/2019	Marge Norskog	Elect Joe Somodi City Council	Disclosure of Campaign Expense	1. Candidate's campaign website does not include "paid for by" statement 2. Candidate's campaign Facebook page does not include "paid for by" statement	Probable causes exists; forwarded to police for further investigation.
3/8/2019	Marge Norskog	Lori 4 Fort Collins	Disclosure of Campaign Expense	1. Candidate's campaign website does not include "paid for by" statement 2. Candidate's personal Facebook page is promoting campaign without "paid for by" statement	1. Probable cause exists; circumstances do not warrant prosecution. 2. No probable cause exists.
3/8/2019	Marge Norskog	Susan Gutowsky for City Council	Disclosure of Campaign Expense	1. Candidate's campaign website does not include "paid for by" statement 2. Candidate's campaign facebook not include "paid for by" statement	1. Probable cause exists; circumstances do not warrant prosecution. 2. No probable cause exists.
3/18/2019	Robbie Morland	Committee to Elect Noah Hutchison	Financial	1. Candidate used a jar at events for cash donations, and reported them as non-itemized donations. Complainant alleges some donations were likely in excess of the \$20 threshold, meaning those donation should be reported with the name and address of contributors	No probable cause exists.
3/26/2019	Marge Norskog	Committee to Elect Noah Hutchison	Financial	1. Contributions made by individuals and LLCs, where individuals may have ownership interests in LLCs. Complainant alleges its a violation of the prohibition against making contributions in the name of another person or knowingly allowing another person to make contribution in your name.	No probable cause exists.
3/26/2019	Robbie Morland	Susan Gutowsky for City Council	Disclosure of Campaign Expense	1. Candidate's flyers and yard signs do not include a "paid for by" statement	Probable causes exists; forwarded to police for further investigation.
4/15/2019	Marge Norskog	Committee to Elect Noah Hutchison	Financial	1. Candidate did not individually itemize certain contributions.	No probable cause exists.

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4/15/2019	Marge Norskog	Citizens for a Sustainable Economy	City Process	1. Complains the City's form Notice of Independent Expenditure does not allow complete transparency.	Complaint does not allege an enforceable violation.
4/15/2019	Marge Norskog	Committee to Elect Noah Hutchison	City Process	1. Complains the City should instruct campaigns on how to report contributions via online services, which retain a percentage of the contribution as a fee.	No probable cause exists.
