

BEFORE THE OFFICE OF ADMINISTRATIVE COURTS  
STATE OF COLORADO

Case No. OS 2009-0001

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IN THE MATTER OF THE COMPLAINT FILED BY COLORADO ETHICS WATCH  
REGARDING ALLEGED CAMPAIGN AND POLITICAL FINANCE VIOLATIONS BY  
COLORADO LEAGUE OF TAXPAYERS

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**CONFESSION OF JUDGMENT**

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Respondent Colorado League of Taxpayers (“the League”), by and through its counsel Hackstaff Gessler LLC, respectfully submits this *Confession of Judgment* as follows:

1. On September 18, 2008, the Colorado League of Taxpayers received an invoice for \$2,810.59 (**Exhibit A**). This amount represented payments for two mail pieces sent several days after the electioneering communication blackout period began on September 5, 2008.
2. The Colorado League of Taxpayers issued a check to pay the invoice, which was processed on September 18, 2008 (**Exhibit B**).
3. Of the \$2810.59, a total of \$2,397.98 was used for mail pieces in Garfield County. This amount is derived by taking the subtotal for “Steve Carter” and allocating sales tax to the subtotal.
4. The Steve Carter mail pieces constituted electioneering communications under Colorado law (**Exhibit C**).
5. Electioneering communications must be reported if they take place after September 5, 2008,<sup>1</sup> and if they exceed \$1,000.<sup>2</sup>
6. A report for the mailers sent by the Colorado League of Taxpayers was due September 29, 2008. The Colorado League of Taxpayers did not file such a report.
7. Accordingly, the Colorado League of Taxpayers recognizes that it erroneously did not report an electioneering communication, as required by Colorado law.

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<sup>1</sup> See Colo. Const. art. XXVIII, § 2(7)(a)(II).

<sup>2</sup> Colo. Const. art. XXVIII, § 6.

Respectfully submitted this 13th day of April, 2009.

A handwritten signature in black ink, appearing to read "Scott E. Gessler", written over a horizontal line.

Scott E. Gessler, Esq. #28944

Mario D. Nicolais, II. Esq. #38589

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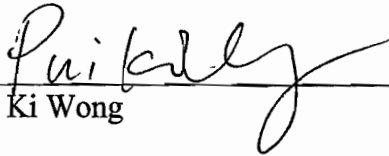
[mnicolais@hackstaffgessler.com](mailto:mnicolais@hackstaffgessler.com)

Attorneys for Colorado League of Taxpayers

**CERTIFICATE OF SERVICE**

I certify that on this 13th day of April, 2009, the foregoing **CONFESSION OF JUDGMENT** was filed and served on all parties and other interested persons via facsimile to:

Chantell Taylor, Reg. No. 33059  
Luis Toro, Reg. N. 22093  
Colorado Ethics Watch  
1630 Welton Street, Suite 415  
Denver, CO 80202  
Attorney for Complainant

  
\_\_\_\_\_  
Pui Ki Wong



Advanced Direct Marketing, Inc.  
 712 E. Eisenhower Blvd.  
 Loveland, CO 80537  
 (Ofc) 970-669-9800  
 (FAX) 970-669-1920

# Invoice

DATE	INVOICE #
9/18/2008	163875

**BILL TO:**

Colorado League of Tax Payers  
 PO Box 1341  
 Aurora, CO 80014

PO Number	TERMS	DUE DATE	REP
		9/18/2008	

DESCRIPTION	QTY	RATE	AMOUNT
<b>STEVE CARTER &amp; PAULA SWENSON POSTCARD</b>			
Press Setup	1	17.50	17.50
Full Color Printing 5.75 x 11 Post Card Full Color 2 Sides	6,311	0.107	675.28T
Code Data Base, Direct Print Address, and Sort Mail	6,311	0.045	284.00
Postage-Paid	6,311	0.206	1,300.07
Delivery to Denver Post Office for Reduced Postage	1	75.00	75.00
Subtotal of Invoice For Steve Carter Mailer			2,351.85
<b>PAULA SWENSON MAILER</b>			
Full Color Printing - 5.75 x 11 Post Card Full Color 2 Sides	1,260	0.107	134.82T
Postage-Paid	1,260	0.214	269.64

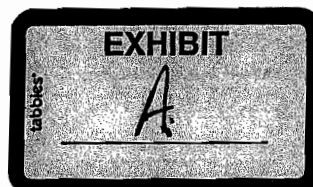
**Thank You For Your Order, We Really Appreciate Your Business!**

**Sales Tax (6.7%)** \$54.28

**Total** \$2,810.59

**Payments/Credits** \$0.00

**Balance Due** \$2,810.59



**Colorado League Of Taxpayers**  
 P.O. Box 3112  
 Brighton, CO 80602-1112

1001  
 CHECK NUMBER

DATE \_\_\_\_\_

PAY TO THE ORDER OF ADMT 1992 2 28 57

Two thousand eight hundred and 57/100 DOLLARS

FOR Carter Newman Richard

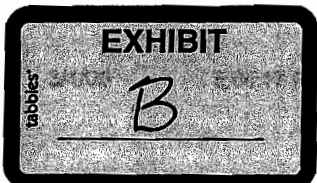
*[Signature]*

⑈1277395412⑈ 09290527 008829633110 00000000001001⑈

Security Bank & Trust Co.  
 102009554  
 24065133480 09/19/2000

Pay To The Order Of  
 General Bank of the West  
 P.O. Box 1000  
 Advanced Direct Marketing, Inc.  
 15020284

R/T Number	09290527	Processing Date	20080919
Sequence Number	008829633110	Amount	2810.59
Account Number	1277395412	Serial Number	00000000001001





**His  
massive  
tax-and-spend  
agenda  
is**

**Steve  
Carter**

**Making Taxpayers Howl**

