

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:22-cv-00477-PAB-MEH

PARABLE, an unincorporated nonprofit association, on behalf of itself and its members, et al.,

Plaintiffs,

v.

JENA GRISWOLD, in her official capacity as Secretary of State for the State of Colorado,

Defendant.

STIPULATION OF FACTS

Plaintiffs PARABLE, Ron Hanks, Laurel Imer, Dave Peters, Charles W. “Casper” Stockham, and Joann Windholz, and Defendant Secretary of State Jena Griswold, in her official capacity, stipulate to the following facts being established as true for all purposes by a preponderance of the evidence:

1. Consistent with Colorado law, Colo. Rev. Stat. § 1-4-702(1), the Colorado Republican Party’s State Central Committee met on September 18, 2021 to vote on whether to opt out of Colorado’s semi-open primary system that allows unaffiliated voters the opportunity to cast ballots in a nonpresidential primary of a single major political party.

2. After establishing a quorum, the vote of the Colorado Republican Party’s State Central Committee was 171.6 votes in favor of opting out of Colorado’s semi-open primary system and 241.3 votes against.

3. 441 voting members were in attendance (either in person or by proxy) at the September 18, 2021 meeting of the Colorado Republican Party’s State Central Committee,

84.6% of the total voting membership of 521. In order to achieve the three-quarters threshold required by Colo. Rev. Stat. § 1-4-702(1) to opt out of the Open Primary, 88.6% ($521 * .75 / 441$) of those in attendance would have had to vote in favor of the Opt Out Resolution.

4. At its meeting on September 18, 2021, the Colorado Republican Party's State Central Committee voted unanimously to authorize the Party or its members to bring a lawsuit challenging Colorado's Proposition 108.

5. 267.64 voting members were in attendance at the meeting of the Colorado Republican Party State Central Committee on September 21, 2019, which was 56.9% of the total membership of 470, less than the 75% threshold required by Colo. Rev. Stat. § 1-4-702(1) to vote to opt out of Colorado's semi-open primary system.

Dated: March 15, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2022, I served a true and complete copy of the foregoing **STIPULATION OF FACTS** upon all parties herein by e-filing with the CM/ECF system maintained by the court and/or email, addressed as follows:

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