

NATURE OF THE CASE

1. On June 28, 2025, Defendants attempted to hold an annual meeting of The Libertarian Party of Colorado (LPCO) in violation of the party Bylaws . On August 23, 2025, Defendants attempted to continue their June 28, 2025, meeting to conduct business including the election of LPCO Officers and Board members. These meetings and subsequent actions were in violation of said Bylaws and are void. This lawsuit seeks to vindicate LPCO's control over its own affairs and leadership.

2. LPCO is the governing body of the Libertarian Party in Colorado. Bylaws govern LPCO and define the duties of its members and officers. LPCO Bylaws constitute a contract among the members of the party and, as such, may not be disregarded by any member or officer.

3. Related to this dispute, LPCO Bylaws provide for an internal, binding dispute resolution mechanism called the Judicial Committee (JC). On September 2, 2025, the JC ruled that the actions taken by the Defendants based on the improperly held June 28, 2025, meeting are void. This group of members declared they would ignore the JC ruling and instead recognized their own JC, which was also allegedly elected at their August 23, 2025, meeting.

4. On September 22, 2025, LPCO obtained a response to a records request to the Colorado Secretary of State (SOS) that demonstrated that on August 25, 2025, the Defendants submitted paperwork to the SOS presenting themselves as the legitimately elected Board of LPCO. Defendant Laube presented himself as the LPCO Chair, apparently elected at their August 23, 2025, meeting.

5. In the interim, an annual meeting of LPCO members was properly called and noticed for October 18, 2025, in Denver, Colorado by LPCO Chair, Hannah Goodman. However,

the Defendants, through Defendant Laube sent a letter and email dissuading LPCO members from attending the October 18, 2025, annual meeting.

6. Defendant Laube later submitted bylaw changes for consideration at the presently scheduled October 18, 2025, actual LPCO annual meeting, and sent out emails reversing the previous position and requesting attendance and support for his candidacy for LPCO chair at the upcoming meeting.

7. Defendants encouraged attendance to their illegitimate meeting of August 23, 2025, and conversely dissuaded participation in the October 18, 2025, annual meeting, in a letter mailed to the voting members of the party and a classified ad in the Denver Post impersonating the LPCO and noticing their August 23, 2025, meeting.

8. Having initially and improperly discouraged voting members from the upcoming October 18, 2025, annual meeting, the Defendants recently sent an email on September 23, 2025, encouraging attendance and requesting support for Defendants Laube and Jones as candidates for Chair and Vice Chair, respectively. This email did not remedy the deprivation of voting member rights caused by the prior meetings and mailing, being a different mode of communication than the previously mailed letter.

9. If the Defendants, led by Defendant Laube, attend the October 18, 2025, annual meeting and present themselves as the Board, LPCO members will be confused as to who is the legitimate LPCO and leadership going into the upcoming annual meeting. This will lead to a lot of unnecessary confusion and could result in any number of different results, including the cancellation of the meeting, disenfranchising members, and extending this leadership dispute, which will continue the long-lasting harm to the purpose, members, and reputation of the LPCO.

JURISDICTION AND VENUE

10. This Court has personal jurisdiction over the Parties pursuant to C.R.S. § 13-1-124(1)(a) because they are Colorado residents or individuals conducting activities within the state, respectively.

11. This Court has subject matter jurisdiction over pursuant to Article II §6 of the Colorado Bill of Rights and pursuant to Article VI §9 of the Colorado State Constitution.

12. Venue is proper in the City and County of Denver pursuant to C.R.C.P. 98(c)(1) because a substantial part of the events occurred in Denver including the receipt of improper documents to the Secretary of State and the location of the properly noticed October 18, 2025, annual meeting is at 3550 Federal Blvd., Denver, CO, 80211. Defendants' actions also affect LPCO operations statewide but are centered in Denver County.

PARTIES

13. Plaintiff LPCO is a Colorado non-profit corporation and qualified minor political party in Colorado with its principal place of business in 11757 W Ken Caryl Ave, F124, Littleton, CO 80127.

14. The current chairperson of LPCO is Hannah Goodman (Chair Goodman), who is a resident of Colorado, and the duly elected Chair of the LPCO Board, elected at the April 1-2, 2023, annual meeting.

15. Defendant, CARYN ANN HARLOS, is a resident of Colorado, is a Registered Parliamentarian, is the purported Convention Parliamentarian appointed at their June 28, 2025,

meeting, and has presented herself as an LPCO Judicial Committee member, elected at their August 23, 2025, meeting.

16. Defendant, KEITH LAUBE, is a resident of Colorado, is the purported Chair of the Emergency Board Oversight Committee (EBOC), appointed at their June 28, 2025, meeting despite not attending the meeting, and has presented himself to the SOS as the LPCO Chair, elected at their August 23, 2025, meeting.

17. Defendant, DOUGLAS JONES, is a resident of Colorado, is a purported member of the EBOC, appointed at their June 28, 2025, meeting, and has presented himself to the SOS as the LPCO Vice Chair, elected at their August 23, 2025, meeting.

18. Defendant JEFFORY ORROK is a resident of Colorado, is a purported member of the EBOC and Convention Secretary Pro Tem, appointed as both at their June 28, 2025, meeting, and has presented himself to the SOS as the LPCO Secretary, elected on August 23, 2025, meeting.

19. Defendant DANIEL LUTZ is a resident of Colorado and is a purported member of the EBOC, appointed at their June 28, 2025, meeting.

20. Defendant BETTE ROSE RYAN is a resident of Colorado, is a purported member of the EBOC, appointed at their June 28, 2025, meeting, and has presented herself to the SOS as the LPCO Fundraising Director, elected on August 23, 2025, meeting.

21. Defendant, MARC MONTONI, is a resident of Colorado and is the purported Convention Chair Pro Tem appointed at their June 28, 2025, meeting.

22. Defendant, W.J. BENNETT RUTLEDGE, is a resident of Colorado and has presented himself to the SOS as the LPCO Treasurer, elected at their August 23, 2025, meeting.

23. Defendant, JANET TURNER, is a resident of Colorado and has presented herself to the SOS as the LPCO Affiliates Director, elected at their August 23, 2025, meeting.

24. Defendant, JOSEPH JOHNSON, is a resident of Colorado and has presented himself to the SOS as the LPCO Campaigns Director, elected at their August 23, 2025, meeting.

25. Defendant, SEAN VADNEY, is a resident of Colorado and has presented himself to the SOS as the LPCO Communications Director, elected at their August 23, 2025, meeting.

26. Defendant, MICHELE POAGUE, is a resident of Colorado and has presented herself to the SOS as the LPCO Membership Director, elected at their August 23, 2025, meeting.

27. Defendant, CLAYTON CASCIATO, is a resident of Colorado and has presented himself as the LPCO Judicial Committee Chair, elected at their August 23, 2025, meeting.

28. Defendant, DARREN HILL, is a resident of Colorado and has presented himself as the LPCO Judicial Committee member, elected at their August 23, 2025, meeting.

29. Defendant, JOHN HJERSMAN, is a resident of Colorado and has presented himself as the LPCO Judicial Committee member, elected at their August 23, 2025, meeting.

30. Defendants DOES 1-28 are known and unknown participants in the invalid annual meetings of June 28, 2025, and August 23, 2025, whose identities will be ascertained through discovery.

GENERAL ALLEGATIONS

31. Each allegation in this Complaint is incorporated into each claim for relief. Further, the allegations in each claim for relief are incorporated into all other claims for relief.
32. C.R.C.P. 8 requires only a “short and plain statement of the claim showing that the pleader is entitled to relief.” It also provides, “Relief in the alternative or of several types may be demanded.” It further provides, “A party may also state as many separate claims or defenses as he has, regardless of consistency and whether based on legal or on equitable grounds or both.” Finally, it provides, “No dollar amount shall be stated in the prayer or demand for relief.”
33. LPCO is a nonprofit corporation and political party committee, governed and operating under the law of the State of Colorado.
34. As a nonprofit corporation, the LPCO operates under Bylaws adopted April 1-2, 2023, hereinafter referred to as the “Bylaws.” (Exhibit 1)
35. All active members of the LPCO agree to abide by the Bylaws.
36. Provisions of LPCO Bylaws “constitute[] a contract between the [member] and the [entity].” *P.F.P. Fam. Holdings, L.P. v. Stan Lee Media, Inc.*, 252 P.3d 1, 7 (Colo. App. 2010); (“In construing corporate Bylaws, we apply the same rules used to interpret statutes, contracts, and other written instruments.”) (citations omitted). This applies with equal force to nonprofit organizations. *Bloom v. Nat’l Collegiate Athletic Ass’n*, 93 P.3d 621, 625 (Colo. App. 2004) (referring to Bylaws of nonprofit as contract between entity and its members).
37. Failure to comply with the LPCO Bylaws constitutes a breach of contract.

38. Colorado law recognizes the LPCO Board as the only body (outside the Libertarian Party's annual meeting) qualified to resolve all controversies over the "regularity of the organization of that party." Colo. Rev. Stat. § 1-3-106.

39. Article X and Article XI of the Bylaws explicitly outlines the type of meetings which may properly occur under the Bylaws, and the procedure with which all members of the LPCO agree to call them. (Exhibit 1, p. 9).

40. LPCO Board noticed but canceled the 2025 State Convention scheduled for June 28, 2025, in Holyoke, Colorado, due to failure of a former officer to publish newspaper notices as required by LPCO Bylaws Article XI, Section 1(d), Article X(a), and C.R.S. § 1-4-1301(1)(h).

41. Defendants persisted in holding an unauthorized meeting on the date of June 28, 2025, despite cancellation notices via email (Exhibit 2), posted to the party website, and in-person warnings the day of the cancelled meeting explaining the meeting was improperly noticed and could not proceed. Defendant Harlos interrupted the final in-person courtesy warning and explanation of the improper notice and initiated the invalid proceedings that day.

42. At this June 28, 2025, meeting, the Defendants elected pro tem officers, passed resolutions and amended Bylaws. They also passed a resolution forming the EBOC with purported powers to expend funds, access membership lists, and calling for a continuation of the June 28, 2025, annual meeting (Exhibit 3).

43. On July 7 and 8, 2025, Defendant Laube sent the resolution forming the EBOC and demanded LPCO financial resources and for official convention notice to be published for an August 23, 2025, meeting as a continuation of the June 28, 2025, meeting, which had been adjourned to a later time (Exhibit 4).

44. Defendants mailed misleading letters to members postmarked July 9, 2025. The letter noticed the August 23, 2025, continuation meeting casting doubt on the Board's legitimate October 18, 2025, annual meeting. Notice was also published in the Denver Post (Exhibit 5 & 6).

45. Chair Goodman filed the JC Appeal on July 15, 2025, seeking to invalidate all actions from the June 28, 2025, meeting of the Defendants. The JC, under LPCO Bylaws Article IX, has authority over such disputes (Exhibit 7).

46. Defendants proceeded with the second invalid meeting on August 23, 2025, at APWU Hall in Aurora, Colorado, purporting to elect new board members and conduct other business under EBOC authority.

47. This August 23, 2025, meeting was noticed by both mail and newspaper publication in a manner intended to represent the authority of the LPCO, and further cast doubt on the properly called and noticed October 18, 2025, annual meeting.

48. At the August 23, 2025, meeting, elections were improperly held for party leadership with the results being:

Chair	Keith Laube
Vice-Chair	Douglas Jones
Secretary	Jeffory Orrok
Treasurer	W. J. Bennett Rutledge
Affiliates Director	Janet Turner
Campaigns Director	Joseph Johnson
Communications Director	Sean Vadney
Fundraising Director	Bette Rose Ryan

Membership Director	Michele Poague
Judicial Committee Chair	Clayton Casciato
Judicial Committee Member	Darren Hill
Judicial Committee Member	John Hjersman
Judicial Committee Member	Caryn Ann Harlos

49. On September 2, 2025, the proper JC issued its decision declaring the June 28, 2025, meeting and all derivative actions null and void, including the EBOC formation, resolutions, Bylaws amendments, elections, demands, and the purported August 23, 2025, continuation meeting (Exhibit 8).

50. Instead of complying with the JC decision under both C.R.S. § 1-3-106 and the LPCO Bylaws, Defendants have refused to recognize the JC decision instead making bizarre accusations such as the chair of the JC is not a registered Libertarian voter (Exhibit 9 & 10). The chair of the JC, Eric Beultel, responded by informing them that his voter registration was purposely hidden from public records for the safety of him and his family (Exhibit 11).

51. On September 22, 2025, a response was received for a CORA request from the SOS. The documents provided show that the Defendants on August 25, 2025, submitted paperwork to the SOS presenting themselves as the legitimately elected Board of LPCO (Exhibit 12).

52. Also on September 22, 2025, the Defendants purporting to be the Judicial Committee elected at the August 23, 2025, meeting emailed the proper LPCO Board their decision on an appeal that had been earlier dismissed by the proper JC (Exhibit 13).

53. A properly called and noticed annual meeting of LPCO members is being held on October 18, 2025 (Exhibit 14 & 15).

54. On September 23, 2025, Defendant Laube sent a letter by email making excuses for his own and other defendants' conduct. The Defendants had previously cast doubt on the likelihood that the October 18, 2025 annual meeting would take place, likely discouraging attendance LPCO members in the letters postmarked on July 9, 2025. This new September 23, 2025, communication by the Defendants, sent by email in contradicting their position in the previous mailed letters, now encourages attendance at the October 18, 2025, annual meeting, while asking them to turn out to vote for them to become officers (Exhibit 16).

55. Defendant Laube also submitted Bylaws changes for consideration at the October 18, 2025, annual meeting. Member Bylaws Proposal #8 appears to be a retroactive cure for the errors of the Defendants. Therein Defendants allege “there may be different interpretations of the Bylaws regarding the noticing of conventions.” The LPCO Bylaws hold a higher standard than Colorado statute for the notice requirements of a convention. “All Party conventions”, including special conventions and annual meetings of the membership, are required to apply the same publication notice procedure used by statute for all party officer elections and candidate nominations. This is the only possible interpretation of the LPCO Bylaws Article XI Section 1d. The submission of a bylaw change that would make previously void conduct now valid in the future, demonstrates that they knowingly held a meeting that is void and are in willful breach of contract as members under the LPCO Bylaws (Exhibit 17).

56. Upon information and belief, Defendants plan to participate in the properly called October 18, 2025, annual meeting. The results of which Defendants might reject if unfavorable.

CLAIMS FOR RELIEF

Count I: Declaratory Judgment

57. Plaintiff reallege and incorporate by reference all prior and proceeding paragraphs, as though fully set forth herein.

58. Plaintiff requests that this Court declare that courts in the state of Colorado retain subject matter jurisdiction over enforcement of final judgments rendered by the LPCO Board where the LPCO used its full power to adjudicate through the JC – exhausting all its options – to resolve an internal controversy.

59. This Court should declare that the JC decision of September 2, 2025, is binding, the June 28 and August 23, 2025, unauthorized annual and continuous meetings, respectively, are null and void, and Defendants have no authority to act on behalf of the LPCO.

60. Under Colo. Rev. Stat. § 13-51-101 *et seq.* and C.R.C.P. 57, in the case of an actual controversy within its jurisdiction, the courts may declare the rights and other legal relations of an interested party seeking a declaratory judgment, whether or not other relief is or could be sought or granted.

61. A declaratory judgment action must be based on an actual controversy. To have standing to bring a declaratory judgment action, a Plaintiff must assert a legal basis on which a claim for relief can be grounded. The Plaintiff must allege an injury in fact to a legally protected or cognizable interest. *Constitution Assoc. v. N.H. Ins. Co.*, 930 P.2d 556 (Colo. 1996). Where the declaratory judgment is anticipatory, the declaratory judgment action must be independent and separable from the underlying action and must resolve the controversy for all parties. *Id.*

62. Here, an actual controversy exists within this Court's subject matter jurisdiction regarding whether the Defendants can ignore the binding JC decision of September 2, 2025. The LPCO used its full power to render final judgment on an internal controversy – such controversies lie within the sole province of the party. However, the LPCO retains no authority to enforce that judgment against noncompliant members, because such enforcement mechanisms lie within the sole province of the courts.

63. Plaintiff at bar suffered an injury in fact because members of the LPCO continue to misrepresent their own notices, distributions, statements, and meetings as official party business even after the JC decision of September 2, 2025 declared the actions and statements null and void, pursuant to C.R.S. § 1-3-106 and the LPCO Bylaws as to the internal controversy.

64. Here, Plaintiff has correctly exhausted its internal dispute resolution processes through the JC as a tribunal. The JC exercised its full power to render a ruling upon internal controversies under C.R.S. § 1-3-106 on September 2, 2025. The Court is not barred to consider this controversy and enforce the LPCO Bylaws under the standard established under *Lowry et al. v. District Court of Second Judicial Dist. et al.*, 74 P. 896 (1903) and upheld in *Nichol v. Blair*, 626 P. 2d 761 (Colo. App. 1981), and more recently in *Tonkins et al. v. Burton Brown*, 2023CV30176 (decided February 9, 2023, in El Paso District Court).

65. The *Lowry* Court, specifically, notes that members of the political party in question did not exhaust the internal party remedies available to them prior to requesting judicial intervention. Specifically, the *Lowry* Court opines that “if the opposing factions disregard the only remedy they have for settling such party differences, they may not be heard by the courts.” *Lowry et al. v. District Court of Second Judicial Dist. et al.*, 74 P. 896 (1903).

66. Here, Plaintiff distinguished the case at bar from *Lowry*, *Nichol*, and *Tonkins* because the Parties correctly exhausted the party itself as a tribunal. The LPCO exercised its full power to pass upon internal controversies under C.R.S. § 1-3-106 when it issued its ruling on September 2, 2025 to hear the controversy.

67. As a Colorado entity, the LPCO maintains a constitutional right of access to the courts so it may obtain a speedy remedy without delay required under *Lowry* in Art. II §6 of the Colorado Constitution. It follows that the district courts maintain general jurisdiction where C.R.S. § 1-3-106 is silent, specifically as to enforcement of an appropriately rendered JC decision.

68. The LPCO seeks a declaratory judgment granting subject matter jurisdiction to courts in the State of Colorado because an actual controversy stems from the lack of authority for enforcement of a political party's final judgment where the LPCO JC rendered a ruling over its internal controversy pursuant to C.R.S. § 1-3-106. The LPCO does not seek a declaratory judgment for subject matter jurisdiction over the internal controversy itself. The Colorado Constitution grants this court sole power of legal enforcement to courts of general jurisdiction and the LPCO maintains access to those courts under the same.

WHEREFORE, Plaintiff requests that this Court anticipatorily declares that courts in the state of Colorado have subject matter jurisdiction over enforcement mechanisms which result from the final judgments of both major and minor political parties appropriately rendered under C.R.S. § 1-3-106.

Count II: Breach of Contract

69. Plaintiff realleges and incorporates by reference all prior and proceeding paragraphs, as though fully set forth herein.

70. The LPCO Bylaws constitute a binding contractual agreement between the LPCO and its members.

71. By the conduct described above, including failure to abide by the JC decision of September 2, 2025, and by continuing to claim authority over the LPCO and its leadership positions, Defendants have failed to comply with the LPCO Bylaws.

72. Defendants' failure to comply with the LPCO Bylaws constitutes a breach of contract.

73. As a result of Defendants' failure to comply with the LPCO Bylaws, Plaintiff's rights under the LPCO Bylaws have been impaired.

Count III: Injunctive Relief

74. Plaintiff realleges and incorporate by reference all prior and proceeding paragraphs, as though fully set forth herein.

75. Because this Court retains subject matter jurisdiction over enforcement of final decisions rendered by political parties, Plaintiff requests that this Court enjoin Defendants from misrepresenting any political meetings, distributions, or decisions as official LPCO business pursuant to the JC decision issued against Defendants on September 2, 2025.

76. Plaintiff further requests that this Court enjoin Defendants from acts including but not limited to: utilizing official party email servers and phone numbers; official party logos; use

of the party website; distribution of press releases in the party's name, and use of official party databases pursuant to the JC decision issued against Defendants on September 2, 2025.

77. LPCO does not request that this Court enjoin Defendants from joining the upcoming October 18, 2025 annual meeting, as such an injunction would be a clear violation of U.S. Constitution's First Amendment. Instead, the LPCO seeks to enjoin only those actions where the Defendants misrepresent themselves as conducting official party business pursuant to the JC decision issued against Defendants on September 2, 2025.

78. The grant or denial of injunctive relief lies within the sound discretion of the trial court, and different considerations govern consideration for permanent and temporary injunctions, with standards applicable to permanent injunctions being less demanding. See *Scott v. Scott v. City of Greeley*, 931 P. 2d 525 (Colo. App. 1996); and *Hensen v. Hoth*, 258 F. Supp. 33 (D. Colo. 1996).

LEGAL STANDARD FOR PERMANENT INJUNCTION

79. Under C.R.C.P. 65 and *Rathke v. MacFarlane*, 648 P.2d 648 (Colo. 1982), a permanent injunction requires: (1) reasonable probability of success on the merits; (2) irreparable harm without relief; (3) balance of equities favoring Plaintiff; and (4) public interest favoring the injunction.

ARGUMENT FOR PERMANENT INJUNCTION

80. **Likelihood of Success on the Merits:** Plaintiff has successfully exhausted their internal party remedies for dispute resolution in their favor. The JC decision of September 2, 2025 conclusively invalidates Defendants' actions under LPCO Bylaws. As an internal dispute resolution mechanism, it is binding (see *Boyles v. Colo. High Sch. Activities Ass'n*, 176 P.3d 835

(Colo. App. 2007), enforcing association rulings). Defendants' defiance violates Bylaws and state law, supporting success on all counts. Because Defendants' actions were heard and a final order issued under C.R.S. § 1-3-106, Plaintiff demonstrated success on the merits and this Court should grant preliminary injunction.

81. **Irreparable Harm:** Here, particularly amidst the political climate and looming elections of 2026, the irreparable harm to LPCO should rogue party members against whom a final judgment which bars them from misrepresenting themselves as conducting official LPCO business has already been rendered, is facially self-evident. Active LPCO members putting extensive (and usually unpaid) effort toward the election of candidates – such that have implications on the national political stage – and even those members of opposing political parties, have the right to know which LPCO decisions are official and which are not. Defendants' actions create dueling leadership claims, confuse members, risk misappropriation of resources (e.g., membership lists, funds), and jeopardize LPCO's political status. Harm to organizational integrity is irreparable (see *Planned Parenthood of Rocky Mountains Servs. Corp. v. Owens*, 107 F. Supp. 2d 1271 (D. Colo. 2000)).

82. **Balance of Equities:** Enjoining Defendants preserves the status quo under the legitimate Board; Defendants suffer no harm from ceasing unauthorized acts. LPCO does not seek to prevent members from assembling of their own accord, acting according to their own beliefs, or speaking their own opinion, provided such assembling does not fraudulently represent itself as an official meeting of the party, such action does not fraudulently represent party action, and such speech does not fraudulently represent the party's opinion. Because the threatened injury outweighs the harm that the injunction may cause to the opposing party, this Court should grant the permanent injunction.

83. **Public Interest:** Upholding political party integrity serves the public, ensuring fair participation and compliance with law. In fact, other LPCO members, candidates, members of the press, and members of other political parties will be misled as to official LPCO meetings, actions, and positions without an injunction. Accuracy of information in the current political climate is critical to a functional democracy and the requested injunction will serve to protect that accuracy.

84. For the foregoing reasons, this Court should enjoin Defendants from: 1) misrepresenting any political meetings, distributions, or decisions as official party business pursuant to the JC decision issued against Defendants on September 2, 2025; and 2) enjoin Defendants from acts including but not limited to: utilizing official party email servers and phone numbers; official party logos; use of party websites; distribution of press releases in the party's name; distribution of letters in the party's name by mail or email; use of official party database; and all other acts known and unknown which impersonate the identity of the party pursuant to the JC decision issued against Defendants on September 2, 2025.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests:

A. A preliminary injunction enjoining Defendants from: (1) claiming LPCO authority; (2) holding further invalid meetings; (3) accessing or using LPCO resources; (4) disseminating misleading communications; and (5) acting under EBOC or June/August conventions.

B. An order requiring Defendants to retract all misleading statements and notify members by mail of their compliance with the September 2, 2025, JC decision.

C. Expedited hearing on this petition.

D. Such other relief as the Court deems just, including costs and attorney fees.

Respectfully submitted this 10th day of October, 2025.

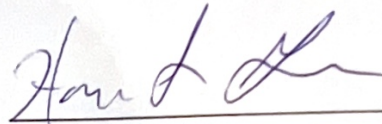
By: /s/ Gary D. Fielder, Esq.
Gary D. Fielder, #19757

Gary D. Fielder, Esq.
Counsel of Record
Law Office of Gary Fielder
2325 W. 72nd Ave., Denver, CO 80221
(303) 650-1505
garyfielder@proton.me

VERIFICATION

Hannah Goodman
310 S Morlan Ave.
Holyoke, CO 80734

I, Hannah Goodman, declare under penalty of perjury under the laws of the United States and Colorado that the foregoing is true and correct to the best of my knowledge.



Hannah Goodman

SUBSCRIBED AND SWORD TO ME this 8th day of October, 2025, by
Hannah Goodman.

Witness my hand and official seal:



My Commission Expires: 8-19-26

