

Submit complaint by mail or email to:
Colorado Secretary of State
Campaign Finance Enforcement
1700 Broadway, Suite 550
Denver, CO 80290 CPFcomplaints@ColoradoSOS.gov



RECEIVED
10/09/2025
ELECTIONS DIVISION

CAMPAIGN FINANCE COMPLAINT FORM

Any person may file a complaint up to 180 days after the date on which the Complainant either knew or should have known, by the exercise of reasonable diligence, of an alleged violation. A complainant must specifically identify one or more respondents, a violation of Colorado campaign finance rules and regulations (Constitution Article XXVIII, the Fair Campaign Practices Act, or the Secretary of State's rules concerning Campaign and Political Finance), and allege specific facts to support a legal and factual basis for the complaint. (See section 1-45-111.7, C.R.S.)

Please be advised, complaints are public information and the respondent will be provided a copy of this Complaint. The Division must have sufficient contact information to identify the Respondent and be able to correspond and communicate with both the Complainant and Respondent.

Your Information (Complainant): Contact information for the person or entity filing the complaint:

Full Name: Jason Bailey

Mailing Address: 1410 Grant St C-205, Denver, CO 80203

Telephone Number: 303-989-4540 Email Address: Citizens@CitizensforNOnewdebt.org

Respondent's Information: Contact information for the person or entity alleged to have committed the violation:

Full Name: Rachel Gordan

Mailing Address: POB 100644, Denver, CO, 80250

Telephone Number: 303-570-5446 Email Address: Rachel@rkgdevelopment.com

Website (if applicable): vibrantdenver.com

Please provide the following information (failure to provide sufficient information could result in the complaint being dismissed):

- Date you learned of the violation: 10/6/25
- Alleged violation(s) of campaign finance laws, rules, or regulations (if known) that were violated. For reference, the Fair Campaign Practices Act and the Campaign Finance Rules available, [here](#).
 - ☐ Failure to file a candidate affidavit
 - ☐ Failure to report an expenditure
 - ☒ Prohibited contribution
 - ☐ Missing or improper disclaimer
 - ☐ OTHER: Receiving public tax money while advertising for a YES y
 - ☐ Failure to register a committee
 - ☐ Failure to report a contribution
 - ☐ Prohibited expenditure
 - ☐ Inaccurate or incomplete filing
- Facts to support your allegations (Please provide additional information on next page.)

Complaint form must be signed on bottom of second page.

How did you learn of the alleged violation(s)?

Searchlight Denver listing donors. And google search telling me that Colorado laws prohibit public money from being used for ballot measures. Receiving money from organizations that receive SCFD tax money, lodging tax money, and other tax money is not acceptable according to Colorado law.

Please detail the allegations of your complaint including dates of the alleged violation(s). If known, please cite the provisions of Article XXVIII of the Colorado Constitution, the Fair Campaign Practices Act, Article 45, Title 1, C.R.S., or the Secretary of State's Campaign Finance Rules you believe were violated. **Please provide any supporting documentation or evidence to support your allegations of a Colorado campaign finance law violation(s).**

The Vibrant Denver Bond committee is clearly taking public money from organizations that receive tax money from SCFD and other forms of tax money like lodging tax. And if these organizations claim that it's not tax money, that is simply not true.

The proportional relation to all money coming into that organization that is tax revenue is the percentage of the donation that is from tax revenue. Budget "bucketing" is fine for internal analysis, but external giving is, in part, public money.

Money is fungible and so these organizations are using our tax money, in part, in proportional relation to all monies coming in. For example, if 25% of the organization's total income is tax money, then 25% of the money given to the Vibrant Denver Bond committee is tax money.

Denver Art Museum

Denver Botanic Gardens

Denver Center for the Performing Arts

Denver Zoological

Colorado Museum of Natural History

Visit Denver – lodging tax

And other donors that receive tax money, they are using public money to finance the Vibrant Denver Bond committee

Attached to this email are screen images from Vibrant Denver Bonds of their website, newsletter, **I hereby submit this complaint signed and in writing under section 1-45-111.7(2), C.R.S. and declare under penalty of perjury under the law of Colorado that the foregoing is true and correct to my best knowledge (electronic signature is permitted).**

Complainant's Signature: Jason Bailey signed Jason Bailey

Date: 10/8/2025

In Colorado, the City of Denver cannot use public funds to contribute to a ballot measure campaign, according to both state and city laws. While the government can be involved in a measure it has referred, it is restricted from spending public money to advocate for its passage. [↗](#)

Restrictions on government spending for ballot issues

- **No public funds for advocacy:** Colorado's campaign finance laws make it illegal for the City of Denver to use public money to support or oppose a ballot measure.
- **Government-referred measures:** The city is allowed to refer a ballot measure to voters, such as a bond issue, and spend public money to provide factual information about it. However, the spending must not cross the line into campaign advocacy. [↗](#)

Example: The 2025 Vibrant Denver Bond

The 2025 Vibrant Denver Bond provides a recent example of these rules in action. [↗](#)

- The Denver City Council approved referring the measure to the ballot, a legal action.
- The city can now spend public money to inform voters about what the bond measure would fund, such as infrastructure improvements.
- The city is prohibited from using that money to campaign for a "yes" vote. The campaign in favor of the measure must be funded by private sources. [↗](#)



VIBRANT DENVER BOND

YES ON 2A-2E



VIBRANT DENVER BOND

YES ON 2A-2E

[DONATE](#)

[ENDORSERS](#)

[MEDIA](#)

[FAQS](#)

[JOIN THE CAMPAIGN](#)

[YARD SIGNS](#)

VIBRANT DENVER BOND

Yes on 2A-2E will repair and improve
the critical city infrastructure we rely
on every day.

[SUPPORT VIBRANT DENVER](#)

[GET A YARD SIGN!](#)

[View this email in your browser](#)



VIBRANT DENVER BOND YES ON 2A-2E

What do we get with the [Vibrant Denver Bond](#)? **200+ repairs, improvements and upgrades** to the critical infrastructure we rely on every day.

A **YES on 2A through 2E** will repair and improve the essential city infrastructure – roads and bridges, parks and recreation centers, libraries, museums and theaters, the Botanic Gardens and the Zoo, health care facilities, shelters, emergency response, and more – that we rely on daily. And we can do all this without increasing taxes.

The Vibrant Denver Bond delivers 200+ repairs, upgrades, and improvements—bringing Denver new and modernized libraries, vital clinics and support systems that care for families, and safer, more stable shelters and housing for those who need them most.

Here's what a **YES on 2A through 2E** will deliver:

NEW AND RENOVATED LIBRARIES: at Bear Valley Branch Library, Blair-Caldwell African American Research Library, Decker Branch Library, Green Valley

