

STATE OF COLORADO  
Department of State  
1700 Broadway  
Suite 200  
Denver, CO 80290



Wayne W. Williams  
Secretary of State

Suzanne Staiert  
Deputy Secretary of State

September 22, 2017

Collon Kennedy  
151 S. Humboldt  
Denver, CO 80209

AOK Strategies LLC  
151 S. Humboldt  
Denver CO 80209

Dear Mr. Kennedy:

The Secretary of State received your response to the complaint filed against you. After consideration of the applicable laws and facts presented, the Department issued its description of investigation and findings on September 7, 2017. The Business and Licensing Division found that you violated Colorado's lobbyist laws by failing to register individually as a professional lobbyist, and by failing to submit required disclosure statements for lobbying activities during the 2017 legislative session. The Division also found that the company you purport to own, AOK Strategies LLC, violated Colorado's lobbyist laws by failing to timely file four reports and failing to pay associated fines.

These violations are serious enough to merit proceedings to issue a cease and desist order and to revoke, suspend, or bar from registration both you and AOK Strategies LLC. § 24-6-306(2)(a), (3), C.R.S. In the alternative, the Secretary of State offers you and AOK Strategies LLC the opportunity to cure the violations by coming into compliance in accordance with the enclosed proposed Orders and Stipulations. The Stipulations require you to register and file your overdue disclosures, and you and AOK Strategies to pay all associated fines related to untimely filings.

If you choose to move forward with the Orders and Stipulations, please sign the Stipulations, have your signatures notarized, and return the documents to this office **no later than October 23, 2017**. By signing the Stipulations, you will be waiving your right to bring these matters before a hearing officer, and waiving any right to appeal these final agency actions. Alternatively, if you choose to contest these matters and proceed to a hearing on the issues, please inform this office in writing by the same date.

Please note that you should not engage in any lobbying activities until you are registered and fully in compliance with Colorado's law.

Sincerely,



Mike Hardin  
Director, Business and Licensing Division

**STATE OF COLORADO  
IN THE OFFICE OF THE SECRETARY OF STATE**

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**ORDER AND STIPULATION FOR SUSPENSION**

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IN RE: THE CERTIFICATE OF REGISTRATION OF:

**AOK Strategies LLC  
151 S. Humboldt  
Denver CO 80209**

Professional Lobbyist

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The parties to this settlement and final order are AOK Strategies LLC, by and through Collon Kennedy, and the Secretary of State, the licensing authority. The parties agree as follows:

1. Section 24-6-303, C.R.S, requires a professional lobbyist to register with the Secretary of State before lobbying, and to file the disclosure statements required by section 24-6-302, C.R.S.
2. Section 24-6-302(2.5), C.R.S., requires a professional lobbyist and any lobbying firm to file a monthly disclosure statement with the Secretary of State no later than the fifteenth day after the end of each calendar month in which the lobbyist received any income from or made any expenditures for lobbying.
3. Section 24-6-302(7), C.R.S., requires the Secretary of State to impose penalties of twenty dollars per day for each business day that a disclosure statement is not filed for the first ten business days. For failure to file on the eleventh business day, and for each business day thereafter, the Secretary of State is required to impose a penalty of fifty dollars per day.
4. Section 24-6-305(2)(a), C.R.S., authorizes the Secretary of State to revoke, suspend for a maximum period of one year, or bar from registration a for maximum period of one year or the remainder of the legislative biennium, a certificate of registration as a professional lobbyist for failure to file reports required by section 24-6-303, C.R.S., or for failure to pay a penalty imposed under section 24-6-302(7), C.R.S.
5. AOK Strategies LLC is registered as a Colorado limited liability company formed in 2015 and has Entity ID 20151393666.
6. On February 14, 2017, AOK Strategies LLC registered as a professional lobbyist with the Colorado Department of State. The entity was issued Lobbyist ID 20175003718. The entity registered as a "Lobbying firm with 2 or more members".
7. On March 15, 2017, AOK Strategies LLC filed both its January Disclosure Report, which was a month late, and its February Disclosure Report.
8. On April 19, 2017, AOK Strategies LLC filed its March Disclosure Report four days late.

9. On July 17, 2017, AOK Strategies LLC filed its June Disclosure Report and Cumulative Report two days late.
10. The records of the Secretary of State show that AOK Strategies LLC accrued fines for delinquent monthly reports in the amount of \$920.00.
11. AOK Strategies LLC stipulates that it is barred from renewing its certificate of registration and from engaging in lobbying activities until such time as it pays in full all penalties and fines associated with the untimely-filed reports described in paragraphs 6 through 9 of this Order and Stipulation.
12. AOK Strategies LLC acknowledges that by signing this Stipulation, it voluntarily waives its right to have this matter adjudicated in front of an administrative tribunal.
13. Each of the persons signing this Stipulation expressly warrants that he or she has authority to enter into this agreement.
14. The parties acknowledge that they have had the option of being represented by legal counsel of their own choice and that, if they exercised that option, their counsel has fully advised them concerning their rights and obligations.
15. This Stipulation constitutes the complete and exclusive statement of agreement of each of the parties relative to the subject matter hereof, and supersedes all previous oral and written proposals, negotiations, representations or understandings concerning the subject matter. The parties expressly disclaim any right to enforce or claim the effectiveness of any oral modification to this Stipulation based upon a course of dealing, waiver, reliance, estoppel or other similar theory of law.
16. This Stipulation shall be entered as an Order of the Secretary of State, constitutes the final agency action of the Secretary of State in **In re: The Certification of Registration of AOK Strategies LLC**, and will be maintained as a public record of the Secretary of State's office. All parties to this Stipulation waive any right of appeal from this final agency action, including, but not limited to, any rights pursuant to section 24-4-106, C.R.S.

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**STATE OF COLORADO  
IN THE OFFICE OF THE SECRETARY OF STATE**

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**ORDER AND STIPULATION**

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IN RE: LOBBYING COMPLAINT FILED AGAINST:

**Collon Kennedy  
151 S. Humboldt  
Denver CO 80209**

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The parties to this settlement and final order are Collon Kennedy and the Secretary of State, the licensing authority. The parties agree as follows:

1. Section 24-6-303, C.R.S, requires a professional lobbyist to register with the Secretary of State before lobbying, and to file the disclosure statements required by section 24-6-302, C.R.S.
2. Section 24-6-303(1)(a), C.R.S, mandates that “[b]efore lobbying, a professional lobbyist shall file an electronic registration statement with the secretary of state that contains . . . [h]is or her full legal name . . .[.]”
3. Section 24-6-303(4), C.R.S., mandates that “[n]o individual shall act as a professional lobbyist unless he has received a certificate of registration as provided in section 24-6-305(1).”
4. Section 24-6-302(2.5), C.R.S., requires a professional lobbyist and any lobbying firm to file a monthly disclosure statement with the Secretary of State no later than the fifteenth day after the end of each calendar month in which the lobbyist received any income from or made any expenditures for lobbying.
5. Section 24-6-302(3)(b), C.R.S., requires a professional lobbyist to file an annual disclosure statement for the entire fiscal year no later than July 15 that covers the immediately preceding fiscal year.
6. Section 24-6-302(7), C.R.S., requires the Secretary of State to impose penalties of twenty dollars per day for each business day that a disclosure statement is not filed for the first ten business days. For failure to file on the eleventh business day, and for each business day thereafter, the Secretary of State is required to impose a penalty of fifty dollars per day.
7. Section 24-6-305(2)(a), C.R.S., authorizes the Secretary of State to revoke, suspend for a maximum period of one year, or bar from registration a for maximum period of one year or the remainder of the legislative biennium, a certificate of registration as a professional lobbyist for failure to file reports required by section 24-6-303, C.R.S., or for failure to pay a penalty imposed under section 24-6-302(7), C.R.S.

8. On December 23, 2001, Collon Kennedy registered as a professional lobbyist. He was issued Lobbyist ID 20017000399. His registration expired on June 30, 2002 and he did not subsequently renew it.
9. On March 13, 2017, Senator Irene Aguilar filed a complaint with the Secretary of State, alleging that Collon Kennedy had been at the Colorado State Capitol lobbying on behalf of Senate Bill 17-143.
10. On May 31, 2017, Mr. Kennedy provided a written response to the complaint. In his response, Mr. Kennedy stated that AOK Strategies LLC was his company; that AOK Strategies LLC was registered as a lobbying entity; and that reports filed by AOK Strategies LLC disclosed bills lobbied by Mr. Kennedy, communications by Mr. Kennedy with covered officials, and income received from clients.
11. Mr. Kennedy stipulates and agrees that he is barred from engaging in lobbying activities until he completes all of the following actions:
  - a. Registers himself as an individual professional lobbyist in accordance with section 24-6-303, C.R.S.
  - b. Files all required individual professional lobbyist disclosure statements, to cover all periods in which he engaged in lobbying activity not previously disclosed in compliance with Colorado law.
  - c. Pays all fines associated with the overdue reports filed in accordance with this Stipulation and Order.
12. If Mr. Kennedy fails to complete all actions listed in Paragraph 11 within sixty days of the date of his execution of this Stipulation, the parties stipulate and agree that Mr. Kennedy will be barred from registration for a period of one year from the date of his execution of this Stipulation.
13. Mr. Kennedy acknowledges that by signing this Stipulation he voluntarily waives his right to have this matter adjudicated in front of an administrative tribunal.
14. Mr. Kennedy acknowledges that he signed this Stipulation of his own free will and not under duress or coercion.
15. Each of the persons signing this Stipulation expressly warrants that he or she has authority to enter into this agreement.
16. The parties acknowledge that they have had the option of being represented by legal counsel of their own choice and that, if they exercised that option, their counsel has fully advised them concerning their rights and obligations.
17. This Stipulation constitutes the complete and exclusive statement of agreement of each of the parties relative to the subject matter hereof, and supersedes all previous oral and written proposals, negotiations, representations or understandings concerning the subject matter. The parties expressly disclaim any right to enforce or claim the effectiveness of any oral modification to this Stipulation based upon a course of dealing, waiver, reliance, estoppel or other similar theory of law.
18. This Stipulation shall be entered as an Order of the Secretary of State, constitutes the final agency action of the Secretary of State in **In re: Lobbying Complaint Filed Against**

**Collon Kennedy**, and will be maintained as a public record of the Secretary of State's office. All parties to this Stipulation waive any right of appeal from this final agency action, including, but not limited to, any rights pursuant to section 24-4-106, C.R.S.

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**CERTIFICATE OF MAILING**

This is to certify that I have duly mailed the within **LETTER** and two **ORDER AND STIPULATION** (proposed) documents to the addresses below by depositing copies of the same in the United States mail, first class postage paid, at Denver, Colorado, **Friday, September 22, 2017** addressed as follows:

Collon Kennedy  
151 S. Humboldt  
Denver, Colorado 80209

AOK Strategies LLC  
151 S. Humboldt  
Denver, Colorado 80209



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Andrea Gyger  
Administrative Division  
Colorado Department of State