

**IN THE MATTER OF A CONTROVERSY REGARDING THE REGULARITY OF
THE CONGRESSIONAL DISTRICT 3 ASSEMBLY, THE DENIAL OF ACCESS
TO FLOOR NOMINATION, AND THE DISENFRANCHISEMENT OF A
PROSPECTIVE CANDIDATE**

Complainant

Stephen Varela
Registered Republican in the State of Colorado

Respondents

Christy Fidura, Vice Chairwoman of Congressional District 3 and National Committeewoman
David Peters, Chairman of Congressional District 3
Lynetta Schull, Secretary of Congressional District 3
Michelle Gray, Pueblo County Republican Party Chair
Jonathan Post, Sergeant-at-Arms for the Congressional District 3 Assembly
Alec Hanna, Executive Director of the Colorado Republican Party
Tonya Van Beber, volunteer acting in coordination with party leadership and staff
Unidentified Pueblo County Sheriff's deputies and security personnel acting at the direction of party officials

FORMAL CONTROVERSY AND COMPLAINT

Complainant Stephen Varela submits this controversy and complaint concerning the regularity, fairness, and integrity of the Congressional District 3 Assembly held on April 10, 2026, at the Occhiato Center on the campus of Colorado State University Pueblo. This complaint arises out of a coordinated denial of Complainant's re-entry into the assembly at the exact moment nominations from the floor for the office of Member of the State Board of Education were opened, thereby preventing Complainant from seeking nomination and effectively disenfranchising him from the only nomination process then available to him under the rules adopted for that assembly.

This complaint is intended to document in full detail the acts that occurred, the individuals involved, the statements made, and the resulting harm. The purpose of this filing is to seek review, accountability, and corrective action, to preserve the integrity of the nominating process, and to ensure that no Republican candidate or participant is again denied access to a lawful nomination process through selective exclusion, misuse of authority, or the use of law enforcement as a barrier to participation.

INTRODUCTION

At the April 10, 2026, Congressional District 3 Assembly, the adopted rules for the day allowed nominations from the floor. Complainant attended that assembly as a Republican intending to seek nomination from the floor, including specifically for the office of Member of the State Board of Education from Congressional District 3. Complainant had prepared to follow the process as explained to him by the district chair the day before. He understood that he would need a nominator and a second from among the delegates and that, if nominated, he would be entitled to address the body.

Complainant was lawfully present inside the assembly. He was seated inside the room while proceedings were ongoing. He briefly stepped outside to take a phone call while a congressman was giving a legislative update. That legislative update immediately preceded the opening of nominations for State Board of Education. When Complainant attempted to return to the room, he was blocked from re-entry by multiple sheriff's deputies, security personnel, and party officials. While he was blocked, nominations for State Board of Education were opened and closed.

Complainant repeatedly informed those blocking him that nominations were happening at that very moment and that by preventing his re-entry they were preventing him from running for office. He was nevertheless kept out until after nominations had closed.

The exclusion was not based on disorderly conduct, not based on any neutral enforcement measure, and not based on any rule that required disclosure of his candidacy before entry. Instead, Complainant was given shifting and inconsistent explanations, including that he had allegedly been removed before, that unnamed individuals did not want him there, that he needed to disclose what office he was running for and who his nominators were before being allowed back in, and later, after the fact, that there had supposedly been a fire capacity issue. These explanations are inconsistent with one another, inconsistent with the actual facts, and contradicted by recorded statements made by those involved, including a statement by Executive Director Alec Hanna that "the National Committeewoman said I had to remove him."

Complainant contends that he was denied access to a valid floor nomination process expressly allowed by the rules of the assembly, that his ability to seek office was intentionally and selectively obstructed, that his rights within the party nomination process were violated, and that this conduct disenfranchised him from an available pathway to candidacy. If this can be done to one Republican candidate, it can be done to any Republican candidate.

PARTIES AND RELEVANT PERSONS

Complainant Stephen Varela is a registered Republican in the State of Colorado and was present at the Congressional District 3 Assembly on April 10, 2026, for the purpose of participating in the assembly and seeking nomination from the floor.

Respondent Christy Fidura was at all relevant times the Vice Chairwoman of Congressional District 3 and also the National Committeewoman. Based on statements made to Complainant by others and recorded on video (linked below), she was identified as the source of the directive that Complainant was to be removed or excluded.

Respondent David Peters was the Chairman of Congressional District 3 and had spoken with Complainant by telephone the day before the assembly regarding the procedure for nomination from the floor.

Respondent Lynetta Schull was the Secretary of Congressional District 3 and later left a voicemail attempting to justify prior actions by reference to alleged fire capacity, an explanation inconsistent with what was said and done at the time of the exclusion.

Respondent Michelle Gray was the Pueblo County Republican Party Chair and was observed speaking with Jonathan Post and engaging with security in the moments immediately preceding Complainant's exclusion from re-entry.

Respondent Jonathan Post was acting as Sergeant-at-Arms for the Congressional District 3 Assembly and was part of the group involved in the events immediately surrounding Complainant's exclusion.

Respondent Alec Hanna was the Executive Director of the Colorado Republican Party and, on video (linked below), stated that the National Committeewoman said he had to remove Complainant. He also acknowledged that Complainant would have been allowed back in if he had disclosed who his nominators were.

Respondent Tonya Van Beber was a volunteer who, in coordination with Alec Hanna, told Complainant that he would not be permitted to re-enter unless he disclosed what office he was running for and who his nominators were.

Unidentified sheriff's deputies and security personnel physically blocked Complainant's access to the room and enforced the exclusion.

FACTUAL BACKGROUND

On April 9, 2026, the day before the assembly, Complainant contacted CD3 Chairman David Peters by telephone to ask about the procedure for seeking nomination from the floor. During that conversation, Complainant informed Chairman Peters that he was considering running from the floor and discussed the possibility of running for State Board of Education.

Chairman Peters explained the process and informed Complainant that if he sought nomination from the floor, he would need a nominator and a second, both of whom would need to be delegates, and that if nominated he would receive time to speak. This conversation is important because it establishes that Complainant's intent to run from the floor was known to district leadership in advance and that Complainant was making a good-faith effort to comply with the process as it had been explained to him.

On April 10, 2026, Complainant attended the Congressional District 3 Assembly at the Occhiato Center at Colorado State University Pueblo. He entered the assembly and was seated inside the room. The room contained numerous attendees, including non-delegate observers identifiable by pink lanyards, which were used to designate guests. These individuals were permitted to remain inside the assembly without restriction. Complainant observed that there were open seats available. No fire marshal was present to his knowledge. No general announcement was made requiring observers or attendees to leave for fire code reasons. No neutral or uniformly applied reduction of occupancy occurred. Complainant was not asked to leave due to capacity while seated in the room, and he was not told he was violating any rule of attendance.

At some point while a congressman was delivering a legislative update, Complainant briefly stepped outside to take a phone call. The timing of this is critical. The legislative update immediately preceded the opening of nominations for State Board of Education. Complainant's understanding, and the understanding of those present, was that State Board of Education nominations would occur immediately after the legislative update and before congressional nominations.

As Complainant exited and while he was outside, he observed Michelle Gray, the Pueblo County Republican Party Chair, speaking with Jonathan Post, who was serving as Sergeant-at-Arms, and engaging with security personnel. When Complainant turned to go back into the room while the congressman was finishing his legislative update, he was met by multiple law enforcement officers, security personnel, and party-affiliated individuals standing between him and the door. Complainant estimates that three to four officers were involved, along with one or more security personnel. Their physical positioning made clear that he would not be permitted to pass through the doorway. The circumstance was coercive and conveyed that if he attempted to go past them he risked being physically stopped or arrested.

At that point, a law enforcement officer told Complainant that he was not on the list to be there. Complainant responded that he had already checked in and that he had his badge and lanyard. Another officer, described by Complainant as a lieutenant, then informed him that he had been told by the GOP that Complainant needed to be removed, and that Complainant had allegedly been removed two times before. Complainant immediately denied that assertion and told the officer that he had never previously been removed and that the officer had the wrong person. Complainant also specifically explained to the officer that he was present to run for office from the floor for State Board of Education and that the nomination process for that office was about to occur.

At another point during the exclusion, one officer said to Complainant, "I know you're a nice guy, I've known you, but you got to go. These people don't want you here." This statement is significant because it reveals that the basis for excluding Complainant was not any neutral procedural rule but the will or desire of unnamed people who did not want him present. Complainant responded that they did not have the ability to exclude him simply because they did not want him there, that he was a Republican, that this was a Republican event, that he was registered, and that he had the ability to run from the floor.

While all of this was happening, Complainant repeatedly and expressly warned the officers and those blocking him that nominations for State Board of Education were happening right then. Complainant told them, in substance, that they had just opened the floor for nominations for State Board of Education and that by not allowing him back in they were barring his access to run for office. He explained in real time that if the floor closed while he remained outside, he would lose his only opportunity to run through that process. Despite this explicit notice, they continued to block him.

During the same period, volunteer Tonya Van Beber approached Complainant while Alec Hanna was present and acting in coordination with her. Tonya Van Beber told Complainant that they were not going to let him back into the room unless he told them what office he was running for and who his nominators were. Complainant told her and the officers that he did not have to tell them who his nominators were and that he did not have to pre-disclose that information as a condition of entry or nomination. He further told them that he had the ability to be nominated from the floor and that a delegate could nominate him there. After being pressed, Complainant did state that he was running for State Board of Education and that the nomination for that office was happening at that very moment, but he continued to refuse to disclose the names of his nominators because he understood that no such disclosure was required. Tonya Van Beber continued to indicate that before she would help him or allow him back in, she wanted that information. Alec Hanna was present for this exchange, and Complainant has video (link below) of this gatekeeping behavior.

This unauthorized demand for the names of Complainant's nominators is one of the most serious parts of the incident. It shows that access to the room and therefore access to the nomination process was being conditioned on the disclosure of strategic and private candidacy information not required by the rules of the assembly. Complainant understood this to be improper and said so.

Complainant then contacted someone inside the assembly and asked that party leadership be told that he was being prevented from re-entering while nominations for State Board of Education were opening. Shortly thereafter, Colorado Republican Party State Secretary Russ Andrews exited the assembly and approached the scene. In the presence of law enforcement and party personnel, Mr. Andrews stated that Complainant had every right to be present and that the exclusion was improper, and he directed that Complainant be allowed entry (photo link below). By the time Complainant was finally allowed to enter the room, however, nominations for State Board of Education had already been completed and

the assembly had moved on to congressional nominations. Complainant therefore lost his opportunity to seek nomination.

After the assembly proceedings moved past State Board of Education, Complainant confronted Executive Director Alec Hanna on video (link below) and asked why he had not been allowed in when the nomination was occurring. Alec Hanna stated on video that “the National Committeewoman said I had to remove him.” This statement is one of the most important pieces of evidence in this matter because it directly attributes the source of the exclusion order to Christy Fidura in her capacity as National Committeewoman, as Alec Hanna himself described it. Alec Hanna also stated, in substance, that Complainant would have been allowed in if he had disclosed who his nominators were. That statement is effectively an admission that access to the nomination process was conditioned on Complainant’s compliance with a requirement that was not part of the rules.

Later, Lynetta Schull left Complainant a voicemail asserting that at some earlier point she had asked him to leave because of fire capacity. Complainant disputes that claim and states that he was never told to leave on that basis. More importantly, that explanation does not match the facts observed at the time. There was no fire marshal present. There was no neutral effort to clear the room. Numerous non-delegates and observers remained. Open seating was visible. Complainant had already been seated inside the room and was only prevented from re-entering after stepping out. The fire capacity explanation is therefore inconsistent with what occurred and appears to be an after-the-fact justification.

Complainant also observed that floor nominations were accepted during the assembly process. That matters because it confirms that the process from which he was excluded was real, active, and available to others. The harm here was not hypothetical. Complainant was not denied some abstract possibility. He was blocked from the exact process that the assembly was using in real time to consider candidates.

LEGAL AND PROCEDURAL FRAMEWORK

Colorado law recognizes designation of candidates by assembly and governs the nomination process for partisan candidates through Title 1, Article 4 of the Colorado Revised Statutes, including sections 1-4-601 and 1-4-602. The Colorado Secretary of State’s current major party assembly guidance likewise recognizes the assembly process and requires use of the candidate acceptance and certificate of designation forms following assembly action. The Secretary of State’s current ballot access materials also reflect that petition and assembly are distinct pathways to access the ballot and that a candidate who fails to receive ten percent of the vote at assembly is not then eligible to run by petition for the same office and party. In practical terms, when a candidate is denied access to a lawful assembly designation process at the critical moment, the harm is not theoretical. It can operate as a complete barrier to ballot access through that pathway.

Complainant's challenge here is not that the assembly process exists. It is that the process expressly permitted by the adopted rules for that day was selectively denied to him. Where nominations from the floor are permitted under the rules governing the assembly, access to the room and access to the floor nomination process must be administered fairly, consistently, and without unauthorized preconditions. Once Complainant was lawfully present and prepared to participate in the process that the assembly was in fact using, party officials could not selectively deprive him of that process through ad hoc demands, inconsistent explanations, or reliance on law enforcement absent a legitimate procedural basis.

NATURE OF THE HARM

The harm to Complainant was immediate, concrete, and total. He was not merely inconvenienced. He was not simply delayed. He was denied re-entry to the room during the precise window in which he needed to be present in order to be nominated from the floor. He expressly told the officers and party representatives that this was happening in real time. They persisted in blocking him anyway. By the time they let him in, the nomination had closed and his opportunity had been eliminated.

This was therefore a disenfranchisement from the floor nomination process itself. It was a denial of access to candidacy. It was a denial of equal participation in a party process that was open to others. It was a violation of Complainant's rights within that nominating process. When an individual is selectively blocked from entering a political assembly at the exact moment required to seek nomination, especially through the use of law enforcement and unauthorized conditions, the result is not merely unfairness. It is a deprivation of meaningful participation and a direct barrier to ballot access through the party's own adopted procedure.

If party officials and staff can prevent one known Republican from entering at the crucial moment, demand that he disclose his nominators before they will let him back in, and then hide behind shifting explanations after the fact, then the integrity of the nominating process is broken for everyone. If this can happen to Complainant, it can happen to any candidate, any grassroots Republican, and any participant who is not favored by those controlling access.

MISUSE OF AUTHORITY

Of particular concern is that the directive to exclude Complainant was attributed, by Executive Director Alec Hanna on video, to Respondent Christy Fidura specifically in her capacity as National Committeewoman. This is not a routine or minor party role. The position of National Committeewoman is among the highest-ranking roles within the

Republican Party structure, carrying significant influence and responsibility at both the state and national level.

The use, or invocation, of that position to direct the exclusion of a participant from a local nominating assembly, without procedural basis, without due process, and without independent verification, raises serious concerns regarding misuse of authority. The directive was treated as binding by party staff and was enforced through the involvement of law enforcement, resulting in the immediate and effective denial of Complainant's access to the nomination process.

When a directive associated with such a position is used in a manner that results in the selective exclusion of a prospective candidate from a process expressly permitted under the rules of the assembly, it undermines confidence not only in the fairness of that specific proceeding, but in the integrity of the party's governance structure as a whole. The concern is not limited to Complainant's experience. If authority at this level can be invoked to deny access in this manner, then the same mechanism could be used to exclude other participants or candidates in future proceedings.

GROUND FOR CONTROVERSY AND COMPLAINT

Complainant alleges that the conduct described above constitutes a breakdown in the regularity and fairness of the assembly and gives rise to this controversy and complaint on the following grounds.

First, the rules for the assembly expressly permitted floor nominations. Complainant sought to use that process and was denied access to it.

Second, Complainant was selectively excluded from re-entry while others remained or were permitted to participate. The exclusion was not neutral and was not uniformly applied. Other similarly situated attendees, including individuals wearing pink lanyards, remained inside the assembly without restriction.

Third, Complainant was subjected to an unauthorized gatekeeping requirement. He was told he had to disclose what office he was running for and identify his nominators before being allowed in. That was not a valid condition of access.

Fourth, the exclusion was enforced through the use of security personnel and sheriff's deputies, lending the force of state authority to what was, in substance, a politically motivated or unauthorized internal directive.

Fifth, the explanations given for the exclusion were inconsistent and contradictory. They included prior removals, which Complainant denies and which were unsupported, an expression that unnamed individuals did not want him there, an insistence that he disclose his nominators, and later a fire capacity explanation. These shifting explanations strongly suggest that no legitimate procedural basis existed.

Sixth, Executive Director Alec Hanna directly stated on video that the National Committeewoman said he had to remove Complainant. That recorded statement ties the exclusion to a specific source of authority and undercuts any claim that the event was accidental or merely misunderstood.

Seventh, the exclusion directly caused Complainant to lose his chance to be nominated from the floor for State Board of Education. That causation is clear, immediate, and undeniable.

Eighth, the conduct described herein implicates the integrity of Colorado's candidate designation process itself because the assembly pathway is a recognized ballot access pathway under Colorado law and Secretary of State procedure. Denying access to that pathway at the critical moment can function as a direct barrier to candidacy.

EVIDENCE (ALL LINKS BELOW/SUPPORTING MEDIA FILES)

Complainant is in possession of video and audio evidence supporting the allegations contained in this filing. That evidence includes, but is not limited to, the following.

Exhibit A. Video of the denial of re-entry, showing Complainant being blocked from returning to the assembly while nominations were imminent or underway.

Exhibit B. Video of Tonya Van Beber stating, in substance, that before Complainant would be allowed to come back in, he needed to disclose what office he was running for and who his nominators were.

Exhibit C. Video interview of Alec Hanna conducted by Complainant after the exclusion, in which Hanna states that the National Committeewoman said he had to remove him, and in which he indicates that Complainant would have been allowed in had he disclosed his nominators.

Exhibit D. Audio of voicemail from Lynetta Schull asserting a fire capacity explanation.

Additional witnesses are identifiable through the video evidence and through those present at the scene and may be provided if necessary. Complainant reserves the right to supplement this filing with additional supporting material if requested or if later needed.

REQUEST FOR RELIEF

Complainant submits this matter not merely as a personal grievance, but as a challenge to the integrity, regularity, and fairness of the Congressional District 3 Assembly and its nomination process. The actions described herein did not affect Complainant alone. Rather, they demonstrate a breakdown in procedure and a misuse of authority that, if left unaddressed, creates a precedent by which any participant or prospective candidate could be selectively excluded from the process and denied the ability to seek nomination.

The exclusion of Complainant from the assembly at the precise moment nominations were opened, the imposition of unauthorized conditions on re-entry, the reliance on shifting and inconsistent justifications, and the use of law enforcement to enforce a directive attributed to party leadership collectively raise serious concerns regarding the integrity of the process itself. These actions resulted in the complete denial of Complainant's ability to participate as a candidate and effectively disenfranchised him from the nomination method permitted under the rules of that assembly.

Complainant therefore respectfully requests that the appropriate reviewing authority undertake a full and fair review of the events described in this complaint and determine whether the nomination process for the office of Member of the State Board of Education from Congressional District 3 was conducted in a manner consistent with the rules adopted for the assembly, the recognized candidate designation process under Colorado law, and the fundamental principles of equal access and fair participation.

Complainant further requests that, upon such review, the appropriate authority take whatever corrective action is necessary to restore confidence in the integrity of the process, including consideration of whether the outcome of that nomination process should be reviewed, reconsidered, or otherwise remedied in light of the exclusion described herein. The purpose of such relief is not solely to address the harm to Complainant, but to ensure that the process itself is not left compromised.

Complainant also requests that the conduct of the individuals involved be formally examined, including the origin of the directive to exclude Complainant, the role of party officials and volunteers in enforcing that directive, and the use of law enforcement to carry out that exclusion without independent verification or procedural basis. The facts, including recorded statements and video evidence, warrant careful review to determine whether party rules, standards of conduct, and recognized ballot access protections were violated.

Finally, Complainant requests that clear guidance, safeguards, or corrective measures be established to ensure that no participant or prospective candidate is again denied access to a political assembly or nomination process under similar circumstances. The ability to seek nomination from the floor, once permitted by the rules of the assembly, must be applied fairly, consistently, and without selective interference. If such access can be denied in the manner described herein, then the integrity of the process is placed at risk for all participants.

Complainant brings this matter forward in good faith and in the interest of preserving the fairness and legitimacy of the party's nominating process, not solely for personal benefit, but to ensure that the rights and participation of all members are protected moving forward.

CONCLUSION

This complaint does not concern a misunderstanding, a minor procedural dispute, or a simple personality conflict. It concerns the deliberate denial of access to a live nomination process expressly allowed by the rules of the assembly. Complainant was inside the assembly, briefly stepped out, attempted to return, told those blocking him that nominations were opening right then, and was still held outside until the opportunity had passed. He was subjected to gatekeeping demands for the identity of his nominators, was told by law enforcement that unnamed individuals did not want him there, and later obtained a recorded admission from the Executive Director that the National Committeewoman said he had to be removed.

The result was that Complainant was disenfranchised from the floor nomination process and denied his meaningful opportunity to seek office. The process failed him, and if left unaddressed, the same tactics can be used against others in the future. For the integrity of the party, for the fairness of the nominating process, and for the protection of every Republican's right to participate equally, this controversy and complaint should be sustained and meaningful relief should be granted.

Respectfully submitted,

Stephen Varela
Complainant

SUPPORTING MEDIA FILES

EXHIBIT A - VIDEO SPEAKING WITH OFFICER: <https://drive.google.com/file/d/1xzqgq5T-Xo9ZOGyuVJb8QlkqEGYmWTFk/view?usp=sharing>

EXHIBIT B - VIDEO SPEAKING WITH TONYA VAN BEBER:
<https://drive.google.com/file/d/1SbAQpg9sEs7FDvcLSkbh4lorVvi18zwO/view?usp=sharing>

EXHIBIT C - VIDEO SPEAKING WITH ALEC HANNA:
<https://drive.google.com/file/d/1U5PdznZqDZv8DL1PTXc7jLM2YMtrEf2h/view?usp=sharing>

EXHIBIT D – LENETTA SHULL VOICEMAIL:
https://drive.google.com/file/d/1AsJlcw6yj4gSm_AqIclIk8QxLdPgQ2Gd/view?usp=sharing

PHOTO OF SECRETARY ANDREWS REQUESTING MR. VARELA BE ALLOWED ENTRY:
<https://drive.google.com/file/d/1C59IKY6oYPAC52nv4g4gg9Px0y9YcJXE/view?usp=sharing>

APPLICABLE ASSEMBLY RULES AND IDENTIFIED RULES COMMITTEE MEMBERS

The rules governing the April 10, 2026, Congressional District 3 Assembly were formally adopted and distributed to participants. These rules explicitly governed conduct, access, nominations, and procedural authority within the assembly.

Of particular importance, the rules confirm the following:

- That nominations for candidates would be accepted at the assembly
- That, pursuant to C.R.S. 1-4-601(1.5), no advance notice requirement applies to nominations at the assembly
- That removal from the venue is reserved for disruptive behavior or failure to maintain decorum

At no point did Complainant engage in disruptive behavior, violate decorum, or receive any directive from the Chair requiring removal.

The Rules Committee responsible for these rules includes:

- Kenny Crank, Rules Committee Chairman
- Lisa Zimmerman, Rules Committee Member

Separately, Respondent Christy Fidura, in her capacity as National Committeewoman and Vice Chair, was identified by Executive Director Alec Hanna as the source of the directive that resulted in Complainant's exclusion.

Complainant further observed that Natalee Tennant was present during the incident, was filming, and remained in close proximity throughout the exclusion. She was observed in proximity to Rules Committee member Lisa Zimmerman and followed behind Complainant during the period of exclusion.

The timing, positioning, and continued presence of this individual in coordination with those connected to Rules Committee leadership raises additional concerns regarding awareness, coordination, and involvement.

When considered together with the directive attributed to the National Committeewoman, the involvement of party staff and volunteers, and the use of law enforcement to enforce exclusion, this supports the conclusion that the actions taken were not isolated or incidental, but part of a coordinated effort.