

**SUPREME COURT,
STATE OF COLORADO**

2 East 14th Avenue
Denver, Colorado 80203

DATE FILED
April 8, 2026 1:35 PM

ORIGINAL PROCEEDING PURSUANT
TO C.R.S. § 1-40-107(2)

Petitioner:

Valerie Beck

v.

Respondents:

Colorado Ballot Title Setting Board:

Michael Dohr, Teresa Conley, & Kurt
Morrison

Initiative #251 Designated Proponents:

Suzanne Taheri & Elizabeth Caven

COURT USE ONLY

Case Number:

Attorney for Petitioner:

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**PETITION FOR REVIEW OF FINAL ACTION OF
THE BALLOT TITLE SETTING BOARD CONCERNING
PROPOSED INITIATIVE 2025-2026 #251**

Petitioner Valerie Beck (“Petitioner” or “Beck”), through undersigned counsel, respectfully petitions this Court under C.R.S. § 1-40-107(2) to review the title, ballot title, and submission clause set by the Colorado Title Setting Board (the “Title Board”) for Proposed Initiative 2025-2026 #251 (“Initiative #251”).

I. ACTION OF THE TITLE BOARD

The Title Board first reviewed Initiative #251 at a hearing on March 18, 2026. At that hearing the Title Board found Initiative #251 met the single subject requirement, determined they had jurisdiction, and proceeded to set title. Subsequent to the hearing, Beck filed a motion for rehearing with the Title Board (a second motion for rehearing was filed by Lindsey Rasmussen (“Rasmussen”)). Beck set forth two challenges to the title set for Initiative #251: (1) that it contained multiple subjects, and, consequently, the Title Board did not have jurisdiction to set title; and, (2) that the title contained an impermissible “catch phrase” for the purpose of garnering support.

On April 1, 2026, the Title Board held a rehearing for Initiative #251. In response to the challenges brought by Beck and Rasmussen, the Title Board granted the motions in order to change the title. While the Title Board still found Initiative #251 had a single subject, and it therefore had jurisdiction to set title, the Title Board made several changes to the title. First, the Title Board attempted to clarify that the criteria set forth in Initiative #251 constituted new, limited criteria for maps separate from already established criteria contained in Colo. Const. art V § 44.3. Second, the Title Board attempted to avoid a catch phrase by changing the phrase “was drawn purposefully to favor one political party” to the phrase “does not purposefully favor one political party.” The Title Board then approved the revised title by a 3-0 vote. Petitioner now seeks

review of the Title Board's rehearing actions, and the title set for Initiative #251, before this Court under C.R.S. § 1-40-107(2).

II. ISSUES PRESENTED FOR REVIEW

- A. Whether creating an approval and adoption process for modifications to congressional maps and also creating a new criteria scheme for congressional maps constitute separate subjects, and, consequently the Title Board erred by finding it had jurisdiction and set title.
- B. Whether the phrase "does not purposefully favor one political party" constitutes an impermissible catch phrase or slogan in the title set by the Title Board.

III. SUPPORTING DOCUMENTATION

In accordance with C.R.S. § 1-40-107(2), Petitioner attached certified copies of the following documents related to the Title Board action for Initiative #251:

- (1) The final copy of Initiative #251 petition as submitted to the Title Board;
- (2) The titles and submission clauses set by the Title Board in the original hearing and as modified in the rehearing;
- (3) The determinations, actions, and rulings of the Title Board;
- (4) The fiscal summary for Initiative #251;
- (5) The motions and for rehearing submitted by Beck and Rasmussen.

IV. RELIEF REQUESTED

Petitioner Beck respectfully requests that the Court reverse the actions of the Title Board to set a title and submission clause for Initiative #251. Specifically, Petitioner Beck requests that this Court hold that the Title Board did not have jurisdiction to set title because Initiative #251 does not contain a single subject or, alternatively, that the title set by the Title Board includes an impermissible "catch phrase" under Colorado law.

Respectfully submitted this 8th day of April, 2026.

KBN LAW, LLC

s/ Mario Nicolais
Mario Nicolais
Attorney for Petitioner Valerie Beck



STATE OF COLORADO

DEPARTMENT OF
STATE

CERTIFICATE

I, **JENA GRISWOLD**, Secretary of State of the State of Colorado, do hereby certify that:

the attached are true and exact copies of the filed text, fiscal summary, motion for rehearing, and the rulings thereon of the Title Board for Proposed Initiative "2025-2026 #251 'Congressional Redistricting'"

.....

IN TESTIMONY WHEREOF I have unto set my hand
and affixed the Great Seal of the State of Colorado, at the
City of Denver this 2nd day of April, 2026.

Jena Griswold

SECRETARY OF STATE



COLORADO TITLE SETTING BOARD

IN THE MATTER OF THE TITLE AND BALLOT TITLE AND SUBMISSION
CLAUSE FOR INITIATIVE 2025-2026 #251

MOTION FOR REHEARING

This *Motion for Rehearing* is submitted on behalf of Valerie M. Beck (“Beck”), a registered elector of the State of Colorado. Beck objects to the title and ballot title and submission clause adopted by the Title Board for Proposed Ballot Initiative 2025-2026 #251 (“Initiative #251”). Undersigned counsel hereby submits this *Motion for Rehearing* under § 1-40-107, C.R.S. (2026), and as grounds state as follows:

I. Introduction

Initiative #251 fails to meet the “single subject” and “clearly expressed” mandates of the Colorado Constitution. Additionally, the initiative, title, and ballot title submission clause include an impermissible “catch phrase.” For those reasons, the Title Board should reverse its decision to set title or Initiative #251.

Argument**A. *The Single-Subject Rule***

Colorado Constitution Article V § 1(5.5) requires that “No measure shall be proposed by petition containing more than one subject.” The single-subject rule is intended to prevent two dangers: (1) combining subjects with no necessary or proper connection for the purposes of garnering support for an initiative from various factions, and (2) to help avoid voter surprise or fraud due to passage of a surreptitious provision coiled up in the folds of an initiative. *In re Proposed Initiative on “Public Rights in Waters II,”* 898 P.2d 1076, 1078-79 (Colo.1995); *In re Ballot Title 2011-2012 No. 45*, 2012 CO 26; *In the Matter of the Title, Ballot Title & Sub. Clause for 2015-2016 No. 63*, 2016 CO 34. The single-subject rule prevents proponents from joining two distinct and separate purposes that are not dependent

upon or connected with each other in order to garner support for the initiative. *In re Ballot Title 1999-2000 #104*, 987 P.2d 249, 253 (Colo.1999).

In this instance, the proponents have combined two separate subjects into Initiative #251:

1. Approval and adoption of modifications to maps by the congressional commission and Colorado Supreme Court.
2. Adding the new criteria “drawn purposefully to favor one political party.”

Review and adoption of modified maps is not dependent on or connected to adding new criteria in this initiative. Similarly, adoption of new criteria for determining congressional districts is not dependent or connected to review and adoption of modified maps. To the contrary, both seemed tied together specifically to aggregate support from voters. For example, voters may not approve of the new criteria added, but want some type of approval or adoption process for modifications. In that context, it becomes evident that the two separate subjects have been included for the sole purpose of helping to aggregate support from multiple factions for the initiative as a whole.

Furthermore, joining these two subjects could lead to significant voter surprise. Because adding new criteria is wrapped into one sentence that also includes criteria already in the Colorado Constitution (Colo. Const. article V § 44.3(2) already includes the “whole communities of interest” criteria while § 44.3(3) addresses “politically competitive districts”), it is not evident that new criteria is being added. To the contrary, sandwiched between existing criteria the new criteria is hidden from voters. In this circumstance, the new criteria has literally been wrapped into the folds of the initiative in one clause disguised by already existing criteria. That is a perfect scenario to create surprise for voters who may believe that all the criteria listed already existed.

B. The title and ballot title and submission clause do not clearly express the initiative

In addition to the single subject requirement, it is also necessary that the “subject treated in the body of the proposed initiative be clearly expressed in its

titles.” *In Re Ballot Title 1999-2000 No. 258(A)*, 4. P.3d 1094, 1097 (Colo.2000). The Court has stated that:

“we are bound to assume that the word ‘clearly’ was not incorporated into the constitutional provision under consideration by mistake ... That this word was advisedly used, and was intended to affect the manner of expressing the subject, we cannot doubt. The matter covered by legislation is to be ‘clearly,’ not ‘dubiously’ or ‘obscurely,’ indicated by the title ... The connection must be so obvious as that ingenious reasoning, aided by superior rhetoric, will not be necessary to reveal it. Such connection should be within the comprehension of the ordinary intellect, as well as the trained legal mind.” *In Re Title, Ballot Title 1999-2000 25*, 974 P.2d 458, 462(Colo.1999) quoting *In re Breene*, 14 Colo. 401, 406, 24 P. 3, 4 (1890).

Neither the title nor the ballot title and submission clause clearly express that Initiative #251 introduces new criteria for congressional maps. To the contrary, both set the new criteria alongside criteria already included in the Colorado Constitution thereby confusing the electorate. It is impossible to distinguish that new criteria have been introduced in this initiative without searching through the Colorado Constitution and determining what already exists and what does not. That is the exact type of obscurity that the Court condemned.

C. *The title and ballot title and submission clause includes impermissible “catch phrases”*

“It is well established that the use of catch phrases or slogans in the title, ballot title and submission clause, and summary should be carefully avoided by the Board.” *In re Ballot Title 1999-2000 No. 258(A)*, 4. P.3d at 1100, quoting *In re Amend Tabor No. 32*, 908 P.2d 125, 130 (Colo.1995). Such catch phrases prejudice electors to vote for an initiative “merely by virtue of those words’ appeal to emotion.” *Id.* Such catch phrases are “words that work to a proposal’s favor without contributing to voter understanding” and that “generate support for a proposal that hinges on the content of the proposal itself, but merely on the wording of the catch phrase.” *Id.* They may also form the basis of a slogan or campaign to support an initiative. *Id.* Catch phrases must be determined in the “context of contemporary political debate.” *Id.*

Initiative #251 employs the catch phrase “drawn purposefully to favor one political party” precisely to be used in a campaign. The title and ballot title and submission clause incorporate the catch phrase, and, in so doing, violate the dictate against such use.

Initiative #251 exists in a contemporary political climate where redistricting and gerrymandering have become topics of heated discussion. In fact, Initiative #251 appears to have been a response to initiatives submitted by other proponents that would modify the current congressional maps. Consequently, using a catch phrase that attempts to capitalize on that environment would naturally help passage of the initiative.

Furthermore, the catch phrase itself does not help to enhance voter understanding; rather, it likely confuses voters. The phrase is undefined in the proposed initiative and it does not have an established legal meaning. Rather, it presents an amorphous and subjective phrase that could be interpreted by different voters in a host of divergent ways. For example, some voters may believe it refers to single districts, others may believe that it bars favor across Colorado’s full contingent of congressional districts, while still others might view it as referring to favoring one party in Congress as a whole. Similarly, what “favors” one party over another is so broad in potential scope that it cannot be understood as anything but an appeal to emotion. Similarly “purposefully” indicates some level of intentionality, but fails to inform voters about what that level might be. In each instance the catch phrase does not add to understanding of electors, but instead subjects them to the emotional draw of stopping gerrymandering.

The problem is exacerbated by its placement in the title and ballot title and submission clause. As noted above, “drawn purposefully to favor one political party” has been sandwiched between two criteria that already exist in the Colorado Constitution. That location makes the emotional pull on voters even stronger than if it stood on its own.

These circumstances should be contrasted with circumstances where the Colorado Supreme Court has found a phrase included in an initiative (and the title and ballot title submission clause) does not constitute a catch phrase. In reviewing the phrase “just cause” in *In the Matter of the Title, Ballot Title, and Submission Clause for 2007-2008 #62*, No. 08SA90, p. 18, 20 (Colo.2008), the Court highlighted

COLORADO TITLE SETTING BOARD

**IN THE MATTER OF THE TITLE AND BALLOT TITLE AND SUBMISSION CLAUSE
FOR PROPOSED INITIATIVE 2025-2026 #251**

MOTION FOR REHEARING ON PROPOSED INITIATIVE 2025-2026 #251

On behalf of Lindsey Rasmussen, registered elector of the State of Colorado, the undersigned counsel hereby submits to the Title Board this Motion for Rehearing on Proposed Initiative 2025-2026 #251 (“Initiative #251”) and as grounds therefore states as follows:

I. THE TITLE SET BY TITLE BOARD AT MARCH 18, 2026, HEARING

On March 18, 2026, the Title Board set the following ballot title and submission clause for Initiative #251:

Shall there be an amendment to the Colorado Constitution limiting mid-cycle changes to the existing congressional districts, and, in connection therewith, prohibiting changes to the current congressional districts mid-cycle unless the independent congressional redistricting commission approves a new district plan after holding three public meetings and the Colorado Supreme Court adopts the plan, and prohibiting a plan that fails to preserve, as much as reasonably possible, whole communities of interest or was drawn purposefully to favor one political party or minimize politically competitive districts?

II. GROUNDINGS FOR REHEARING**A. The Initiative Impermissibly Contains More Than One Separate and Distinct Subjects in Violation of the Single Subject Requirement.**

Pursuant to Colo. Const. art. V, §1(5.5),

no measure shall be proposed by petition containing more than one subject, which shall be clearly expressed in its title If a measure contains more than one subject, such that a ballot title cannot be fixed that clearly expresses a single subject, no title shall be set and the measure shall not be submitted to the people for adoption or rejection at the polls.

See also 1-40-106.5, C.R.S. “[T]he Board may not set the titles of a proposed Initiative, or submit it to the voters, if the Initiative contains multiple subjects.” *Aisenberg v. Campbell (In re Title, Ballot Title & Submission Clause 1990-2000 #104)*, 987 P.2d 249, 253 (Colo. 2000).

The single subject requirement serves two functions. First, the single subject requirement “is intended to ensure that each proposal depends upon its own merits for passage.” *Johnson v. Curry (In re Title, Ballot Title & Submission Clause for 2015-2016 #132)*, 2016 CO 55, ¶13. This function prevents proponents from engaging in “log rolling” tactics, that is, combining multiple subjects into a single initiative in the hope of attracting support from various factions that may have different or even conflicting interests.” *In re Title, Ballot Title, & Submission Clause for 2013-2014 #76*, 2014 CO 52, ¶ 32.

Second, the single subject requirement is intended to “prevent surprise and fraud from being practiced upon voters caused by the inadvertent passage of a surreptitious provision ‘coiled up in the folds’ of a complex initiative.” *Mantell v. Fields (In re Title, Ballot Title, & Submission Clause for Proposed Initiative 2025-2026 #158)*, 2026 CO 13, ¶17. (internal citations omitted). “If an initiative advances separate and distinct purposes, the fact that they both relate to the same general concept or subject is insufficient to satisfy the single subject requirement.” 2016 CO 55, ¶15. “It does not matter if the initiative's purposes relate to the same general concept or subject, or if its provisions can be grouped under an overarching theme; an initiative that is susceptible to log rolling or that risks misleading voters will not satisfy the single subject requirement.” 2026 CO 13, ¶19.

Initiative #251 contains more than one subject in violation of article V, section 1(5.5) of the Colorado Constitution, and section 1-40-106.5, C.R.S. The Proponents contend that the single subject of the measure is “mid-year (or mid-term?) redistricting” that allegedly “fills a gap” in existing constitutional provisions regarding congressional redistricting. But the sparse language of the measure clearly omits other mandated criteria for maps adopted in a redistricting year, including contiguity, and this creates a separate subject.

Eliminating the Contiguity Criteria for Approving a Map Outside the Redistricting Year Is a Separate Subject.

Sections 7(c)(I) and (II) of the measure state that “outside the redistricting year, no map may be approved by the Commission or given effect by the Colorado supreme Court if it ... [f]ails to preserve, as much as reasonably possible, whole communities of interest or ... [h]as been drawn purposefully to favor one political party or to minimize politically competitive districts.” The measure does not list any other criteria that the Commission must consider when approving a map outside the redistricting year, or cross-reference Colo. Const. art. V, §4.3, which otherwise governs the criteria that the Commission must follow when approving a map in the redistricting year.

The measure appears to stand alone on what the Commission must do or not do when approving a map outside the redistricting year. For example, the measure requires the Commission to hold at least three public meetings. This differs from Colo. Const., art. V, §44.2(3)(b)’s requirement that the Commission hold “at least three hearings ... in each congressional district.” Counsel for Proponents, when asked at the Review and Comment hearing as to whether there was any geographic requirement for the public meetings or if all three public meetings could be held in Denver, responded that all three meetings could be held in Denver. *See Review & Comment Hearing for Proposed Initiatives 2025-2026 #251, #252, #254 and #255, March 6, 2026; audio at [Colorado](#) at 10:35:16-10:35:47.* Similarly, the measure does

not require that Colorado residents may present maps or testimony in person or in writing for the commission's consideration. This differs from Colo. Const., art. V, §44.2(3)(a) and (b)'s requirement that "[a]ll Colorado residents, ... may present proposed redistricting maps or written comments..." and that the Commission must, "to the maximum extent practicable, provide opportunities for Colorado residents to present testimony at hearings held throughout the state." Counsel for Proponents, when asked at the Review and Comment hearing as to whether the measure required that members of the public be allowed to present testimony, in person or in writing, at the public meetings, responded that there was no requirement to do so. *See id.*, at 10:36:05-10:36:16. The language of the measure, combined with the responses from the Proponents as to their intent, make clear that this measure constitutes all of the criteria that apply to maps approved outside the redistricting year, absent a federalism override.

Contiguity, a criteria that is met if it is possible to travel between any two points in a district without crossing into a different district, is required in Colo. Const., art. V, §44.3 (1)(a) for maps approved by the commission in a redistricting year. But contiguity is not included in the criteria in Initiative #251 for maps approved outside the redistricting year. Unlike the one-person, one-vote doctrine created by the U.S. Supreme Court in *Wesberry v. Sanders*, 376 U.S. 1 (1964), or the Voting Rights Act of 1965, 52 U.S.C. sec. 10301, as amended, contiguity is not federally mandated and will not be required under Initiative #251 for Colorado congressional district maps approved outside the redistricting year.

By failing to include a requirement that maps approved outside the redistricting year must be contiguous, the measure creates a separate subject. Coiled up in the folds of the measure is this change in the contiguity requirement for maps approved outside the redistricting year. Voters would be surprised to learn that they thought they were voting on a measure to require congressional district maps outside the redistricting year to be approved by the commission and the Colorado Supreme Court, when they are also voting to allow a congressional district map that contains districts that are not contiguous, such that an island of voters in Craig, Colorado, may be lumped into a district with an island of voters in Denver, or an island of voters in Pueblo, may be lumped into a district with an island of voters in Commerce City. This change in the contiguity requirement for congressional maps approved outside the redistricting year is a separate subject.

Due to its sparse nature, Initiative #251 "run[s] the risk of surprising voters with a 'surreptitious' change," *see In re 2015-2016 #132*, 2016 CO ¶ 26, (quoting § 1-40-106.5(1)(e)(II)), because voters may focus on one change and overlook the other, *see In re 2013-2014 #89*, 2014 CO 66, ¶ 19 ("Th[e] danger [of surprise] exists where an initiative, although claiming to have a single subject, in reality has multiple purposes, and as a result, voters would not expect that passing the initiative would lead to one or more of the initiative's outcomes."). *VanWinkle v. Sage (In re Title, Ballot Title & Submission Clause for 2021-2022 #1)*, 2021 CO 55, ¶ 41

Because elimination of the contiguity requirement for all congressional district maps approved outside the restricting year is not necessary or proper to fill a gap on mid-cycle congressional redistricting, Initiative #251 runs the risk of surprising voters with a surreptitious, significant change to congressional districts in Colorado. This proposed change is an

impermissible second subject "coiled up in the folds" of its proposal. *Mantell v. Fields*, 2026 CO 13, P27, (internal citations omitted).

B. The Ballot Title and Submission Clause Is Misleading and Does Not Correctly and Fairly Express Its True Intent and Meaning.

The title of the Initiative is misleading and does not correctly and fairly express the initiative's true intent and meaning. Section 1-40-106(3)(b), C.R.S. provides:

In setting a title, the title board shall consider the public confusion that might be caused by misleading titles and shall, whenever practicable, avoid titles for which the general understanding of the effect of a "yes" or "no" vote will be unclear. The title for the proposed law or constitutional amendment, which shall correctly and fairly express the true intent and meaning thereof, together with the ballot title and submission clause. . . .

Titles and submission clauses should "enable the electorate, whether familiar or unfamiliar with the subject matter of a particular proposal, to determine intelligently whether to support or oppose such a proposal." *In re Title, Ballot Title & Submission Clause for Proposed Initiative on Parental Notification of Abortions for Minors*, 794 P.2d 238, 242 (Colo. 1990)). The purpose of reviewing an initiative title for clarity parallels that of the single-subject requirement: voter protection through reasonably ascertainable expression of the initiative's purpose. *See id.*

The Title for Initiative #251 is not a clear statement of what this measure actually does. First, the title omits any language informing voters that there is no contiguity requirement for all future mid-cycle congressional district maps.

Second, the title also misleads when it does not alert voters to the change in the *status quo* that outside the redistricting year, the commission does not have to allow Colorado residents to present proposed maps, written comments, or testimony at public meetings.

Third, the title makes no mention that commission hearings outside the redistricting year do not have to be held in each congressional district, but instead could all be held in one location.

Here, the title for Initiative #251 is one for which the general understanding of the effect of a "yes" or "no" vote will be unclear. *See* 1-40-106(3)(b), C.R.S. The title "does not contain sufficient information to enable voters to determine intelligently whether to support or oppose the initiative." *Hayes v. Spalding (In re Title, Ballot Title and Submission Clause for 2015-2016 #73)*, 2016 CO 24, ¶ 34; *see also Garcia v. Montero (In re Ballot Titles 2001-2002 #21 & #22)*, 44 P.3d 213, 222 (Colo. 2002) ("The titles, standing alone, should be capable of being read and understood, and capable of informing the voter of the major import of the proposal, but need not include every detail. They must allow the voter to understand the effect of a yes or no vote on the measure. When they do not, both the title board and this court fail in our respective functions."). The title for Initiative #251 does not enable voters to make an informed choice because it does not correctly and fairly express the measure's true intent and meaning.

III. CONCLUSION

Based on the foregoing, Objector Lindsey Rasmussen requests a rehearing of the Title Board for Initiative 2025-2026 #251, because the initiative contains multiple subjects, the title is unclear and misleading to voters, and it fails to fairly express the initiative's true meaning and intent. As a result, the Title Board lacks jurisdiction to set a title and should reject the measure in its entirety.

Respectfully submitted this 25th day of March, 2026.

TIERNEY LAWRENCE STILES LLC

By: /s/ Martha M. Tierney
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ATTORNEYS FOR OBJECTOR LINDSEY
RASMUSSEN

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 25th day of March, 2026, a true and correct copy of **MOTION FOR REHEARING ON PROPOSED INITIATIVE 2025-2026 #251** was filed and served on Proponents Suzanne Taheri and Elizabeth Caven, via email to their counsel of record as follows:

Suzanne Taheri
West Group
6501 E. Belleview Ave., Suite 375
Englewood, CO 80111
Email: st@westglp.com

Attorneys for Proponents

/s/ Martha M. Tierney

Ballot Title Setting Board

Proposed Initiative 2025-2026 #251¹

The title as designated and fixed by the Board is as follows:

An amendment to the Colorado Constitution limiting mid-cycle changes to the existing congressional districts, and, in connection therewith, prohibiting changes to the current congressional districts mid-cycle unless the independent congressional redistricting commission approves a new district plan after holding three public meetings and the Colorado Supreme Court adopts the plan, and prohibiting a plan that fails to preserve, as much as reasonably possible, whole communities of interest or was drawn purposefully to favor one political party or minimize politically competitive districts.

The ballot title and submission clause as designated and fixed by the Board is as follows:

Shall there be an amendment to the Colorado Constitution limiting mid-cycle changes to the existing congressional districts, and, in connection therewith, prohibiting changes to the current congressional districts mid-cycle unless the independent congressional redistricting commission approves a new district plan after holding three public meetings and the Colorado Supreme Court adopts the plan, and prohibiting a plan that fails to preserve, as much as reasonably possible, whole communities of interest or was drawn purposefully to favor one political party or minimize politically competitive districts?

Hearing March 18, 2026:

Single subject approved; draft title changed; titles set.

The Board determined that the proposed initiative requires the addition of language to the Colorado Constitution. The requirement for approval by fifty-five percent of the votes cast applies to this initiative.

Board members: Michael Dohr, Theresa Conley, Kurt Morrison

Hearing adjourned 2:31 P.M.

¹ Unofficially captioned “**Congressional Redistricting**” by legislative staff for tracking purposes. This caption is not part of the titles set by the Board.

Ballot Title Setting Board

Proposed Initiative 2025-2026 #251¹

The title as designated and fixed by the Board is as follows:

An amendment to the Colorado Constitution concerning mid-cycle congressional redistricting, and, in connection therewith, prohibiting congressional redistricting mid-cycle unless the following limited criteria is met holding three public meetings regarding the new map, the map preserves whole communities of interest and does not purposefully favor one political party or minimize politically competitive districts, and the map is approved by an independent congressional redistricting commission and adopted by the Colorado Supreme Court.

The ballot title and submission clause as designated and fixed by the Board is as follows:

Shall there be an amendment to the Colorado Constitution concerning mid-cycle congressional redistricting, and, in connection therewith, prohibiting congressional redistricting mid-cycle unless the following limited criteria is met holding three public meetings regarding the new map, the map preserves whole communities of interest and does not purposefully favor one political party or minimize politically competitive districts, and the map is approved by an independent congressional redistricting commission and adopted by the Colorado Supreme Court?

Hearing March 18, 2026:

Single subject approved; draft title changed; titles set.

The Board determined that the proposed initiative requires the addition of language to the Colorado Constitution. The requirement for approval by fifty-five percent of the votes cast applies to this initiative.

Board members: Michael Dohr, Theresa Conley, Kurt Morrison

Hearing adjourned 2:31 P.M.

Rehearing April 1, 2026:

Motions for rehearing (Beck and Rasmussen) granted only to the extent that the Board made changes to the title (3-0).

¹ Unofficially captioned “**Congressional Redistricting**” by legislative staff for tracking purposes. This caption is not part of the titles set by the Board.

The Board determined that the proposed initiative requires the addition of language to the Colorado Constitution. The requirement for approval by fifty-five percent of the votes cast applies to this initiative.

Board members: Michael Dohr, Theresa Conley, Kurt Morrison

Hearing adjourned 12:20 P.M.

2025-2026 #251 – Final

Be it enacted by the People of the state of Colorado:

SECTION 1. In the constitution of the state of Colorado, section 44.4 of article V, **add 7**, as follows:

(7)(a) UPON ADOPTION AND APPROVAL OF THE FINAL PLAN, NO PLAN MAY BE MODIFIED FOR THE 2028 CONGRESSIONAL ELECTION OR THEREAFTER EXCEPT WITH THE APPROVAL OF THE CONGRESSIONAL COMMISSION AND ADOPTION BY THE COLORADO SUPREME COURT.

(b) IN REVIEWING ANY PLAN OUTSIDE THE REDISTRICTING YEAR, THE COMMISSION MUST HOLD AT LEAST THREE PUBLIC MEETINGS.

(c) OUTSIDE THE REDISTRICTING YEAR, NO MAP MAY BE APPROVED BY THE COMMISSION OR GIVEN EFFECT BY THE COLORADO SUPREME COURT IF IT:

(I) FAILS TO PRESERVE, AS MUCH AS REASONABLY POSSIBLE, WHOLE COMMUNITIES OF INTEREST OR;

(II) HAS BEEN DRAWN PURPOSEFULLY TO FAVOR ONE POLITICAL PARTY OR TO MINIMIZE POLITICALLY COMPETITIVE DISTRICTS.



Fiscal Summary

Legislative Council Staff

Nonpartisan Services for Colorado's Legislature

Measure: Initiative 251 – CONGRESSIONAL REDISTRICTING

Analyst: Hamza Syed, hamza.syed@coleg.gov, 303-866-4976

Date: March 16, 2026

Fiscal Summary of Initiative 251

This fiscal summary, prepared by the nonpartisan Director of Research of the Legislative Council, contains a preliminary assessment of the measure's fiscal impact. A full fiscal impact statement for this initiative is or will be available at leg.colorado.gov/bluebook. This fiscal summary identifies the following impact.

State Expenditures

The measure requires the independent redistricting commission to hold three public hearings for any changes to the congressional district map done outside of the redistricting year. This will increase expenditures to appoint members to the redistricting commission for any vacancies that exist, for Legislative Council Staff to support the commission, and for the commission to hold public hearings reviewing the map. There will also be additional workload for the Colorado Supreme Court to review any new congressional maps.

Economic Impact

This initiative is not expected to have a direct economic impact on the state.