



1144 Sherman Street, Denver, CO 80203 • (p) 303-831-6411 / 866-578-0936 • (f) 303-860-8175 • [www.cml.org](http://www.cml.org)

March 20, 2017

Dear Honorable Commissioners:

At its March 6, 2017, meeting, the Independent Ethics Commission (IEC) requested public comment on a draft position statement concerning the implementation of Position Statement 16-01 (home rule counties and municipalities). Public comments were requested to be filed by the close of business on March 27, 2017, for consideration at the IEC's April 3, 2017, meeting.

The Colorado Municipal League (CML) is a nonprofit, nonpartisan organization that has served and represented Colorado's cities and towns since 1923. Currently, 269 municipalities (representing more than 99 percent of the state's population) are members of CML. Of CML's members, 101 are home-rule cities and towns. The following comments are submitted on behalf of said home rule municipalities in response to the IEC's request.

IEC has been previously informed of the position of Colorado's home rule municipalities in regard to IEC's Position Statement 16-01. It is the position of Colorado's home rule municipalities that Position Statement 16-01 and the March 6, 2017 Draft Statement concerning the implementation of Position Statement 16-01 are ultra vires and unconstitutional acts in violation of the provisions of Article XXIX and Article XX of the Colorado Constitution.

We ask that Position Statement 16-01 and accompanying implementation policies be withdrawn.

Sam Mamet, Executive Director  
Colorado Municipal League