

Submit complaint by mail or email:

Colorado Secretary of State
Lobbyist Enforcement
1700 Broadway, Suite 550
Denver, CO 80290
LobbyistComplaints@ColoradoSOS.gov



RECEIVED
03/11/2026
ELECTIONS DIVISION

LOBBYIST COMPLAINT FORM

Any person that believes a professional lobbyist, redistricting commission lobbyist, or lobbying firm has violated the Colorado lobbyist laws or the Secretary of State's Rules Concerning Lobbyist Regulation, may file a lobbyist complaint. A complainant must specifically identify one or more respondents, a violation of Colorado lobbyist laws or rules, and allege sufficient facts to support a basis for the violations of law alleged in the complaint. (See 8 CCR 1505-8, Rule 5.1 & 5.3) Please be advised, complaints are public information and the Respondent will be provided a copy of this complaint.

Your Information (Complainant)- Information about the person or entity filing the complaint:

Full Name: Bethany Morris
Address: 1250 Logan St. Denver, CO 80203
Telephone Number: 432-553-8747 Email Address: bethany@bethanyrosemorris.com

Respondent's Information - Information about the lobbyist or lobbying firm alleged to have committed the violation:

Lobbyist Name, Firm Name, or Organization: Iris Halpern
Mailing Address: PO Box 6071. Denver, CO 80206
Telephone Number: (303) 351-1162 Email Address: Iris.halpern@iris4colorado.com
Date of Violation: 2018-2025 Location of Violation: Colorado Capitol

Briefly summarize the allegations of your complaint and attach any supporting documents and materials.

See Attached File

I hereby submit this complaint signed and in writing under section 24-6-308(2), C.R.S. and Rule 5 of the Secretary of State's Rules Concerning Lobbyist Regulation (Electronic signature is permitted.)

Complainant's Signature: Bethany Morris Date: 03/11/2026

The information below showcases what appears to be an intentional and extensive series of improper lobbying actions by Iris Halpern. Over the course of the last 8 years, Ms. Halpern has lobbied the Colorado Legislature without having properly filed as a registered lobbyist with the Colorado Secretary of State. In addition to improperly lobbying without registering, Ms. Halpern appears to be in violation of the prohibition of lobbyist contributions during the legislative session, amounting to a significant series of campaign finance violations.

- Iris Halpern has lobbied for either the law firm that employs her, Rathod Mohamedbhai, or the Colorado Women's Bar Association, 13 times over the course of the past 8 years. Instances include:
 - Testimony to the House Judiciary Committee on February 4th, 2025 supporting HB25-1138 on behalf of the Colorado Women's Bar Association.
 - Testimony to the Senate Judiciary Committee on April 29, 2024 supporting HB24-1372 on behalf of Rathod Mohamedbhai.
 - Testimony to the Senate Education Committee on February 26th, 2024 supporting SB24-049 on behalf of Rathod Mohamedbhai.
 - Testimony to the House Judiciary Committee on April 25th, 2023 supporting SB23-172 on behalf of the Colorado Women's Bar Association.
 - Testimony to the Senate Judiciary Committee on April 5th, 2023 supporting SB23-172 on behalf of the Colorado Women's Bar Association.
 - Testimony to the Senate Judiciary Committee on May 3rd, 2022 supporting HB22-1367 on behalf of the Colorado Women's Bar Association
 - Testimony to the House Judiciary Committee on April 19th, 2022 supporting HB22-1367 on behalf of the Colorado Women's Bar Association
 - Testimony to the House Health and Insurance Committee on April 6th, 2022 opposing HB22-1100 on behalf of Rathod Mohamedbhai.
 - Testimony to the House Judiciary Committee on June 3rd, 2021 supporting SB21-176 on behalf of the Colorado Women's Bar Association.
 - Testimony to the Senate Judiciary Committee on May 6th, 2021 supporting SB21-176 on behalf of the Colorado Women's Bar Association.
 - Testimony to the Senate Judiciary Committee on April 1st, 2021 supporting SB21-176 on behalf of the Colorado Women's Bar Association.
 - Testimony to the Senate Judiciary Committee on April 18th, 2018 supporting HB18-1256 on behalf of the Colorado Trial Lawyer Association.
 - Testimony to the House Judiciary Committee on March 13th, 2018 supporting HB18-1256 on behalf of the Colorado Trial Lawyer Association.

In addition, on her campaign website she lists a "Bills I Have Worked On" section that includes her lobbying efforts for: SB26-005, HB25-1138, HB24-1372, SB24-216, SB23-296, SB23-172, HB22-1367.

Halpern has demonstrated a clear pattern on lobbying the State Legislature across numerous bills and over many years. She is taking credit for these lobbying efforts in her attempt to get

elected to the state legislature. Her position as an attorney should have made it clear to her that she is required to register as a lobbyist. In spite of all of this, it appears that Ms. Halpern did not want to register as a lobbyist so she could continue to make political donations during the legislative session to the same legislators that she was actively lobbying. Her in-session donations across the period of her lobbying efforts include:

- \$50 to Brianna Titone on 4/3/2025
- \$50 to Elisabeth Epps on 4/21/2024
- \$50 to Javier Mabrey on 3/27/2024
- \$50 to Elisabeth Epps on 3/27/2024
- \$25 to Elisabeth Epps on 4/24/2024
- \$20 to Elisabeth Epps on 4/24/2024

In addition to these contributions being prohibited were Ms. Halpern properly filed as a lobbyist, both Reps. Elisabeth Epps and Rep. Javier Mabrey serve(d) on the House Judiciary Committee, a committee that Halpern has testified in front of several times.

This disturbing pattern clearly shows that Ms. Halpern is an active and consistent lobbyist at the Colorado State Legislature, supporting various causes for differing organizations; Halpern herself takes credit for working on many of these bills on her official campaign website, and that she used her lack of filing to make donations to those on a committee she was often lobbying. We believe that the Secretary of State should fine Ms. Halpern for non-compliance and for campaign finance violations, and that she should be required to retroactively register as a lobbyist to better inform the public of the role she has had in shaping policy as a lobbyist.