

OFFICE OF THE SECRETARY OF STATE, ELECTIONS DIVISION
STATE OF COLORADO

IN THE MATTER OF IRIS HALPERN

L2026-01

NOTICE OF INITIAL REVIEW AND INVESTIGATION

Bethany Morris (“Complainant”) filed the above captioned Complaint with the Elections Division of the Secretary of State’s Office (“Division”) on March 11, 2026, alleging violations of Colorado lobbying laws against Iris Halpern (“Respondent”).¹ Complainant alleged that Respondent has violated Colorado law by lobbying members of the General Assembly without first registering as a professional lobbyist.² The Division notified Respondent of the Complaint on March 11, 2026.³

The Division has completed its Initial Review.⁴ For the reasons stated below, the Division initially determines that the Complainant has identified one or more potential violations of Colorado lobbying laws and has alleged sufficient facts to support a basis for those allegations.⁵ The Division therefore will investigate.⁶

ANALYSIS

Any person who believes that a professional lobbyist or lobbying firm has violated Colorado lobbying laws may file a complaint with the Colorado Secretary of State.⁷ Under Rule 5.3.1 of the Secretary’s Rules Concerning Lobbyist Regulation, the Division must initially review a complaint upon its receipt to determine: (1) whether the complaint specifically identified one or more violations of section 24-6-301 et seq., C.R.S.; and (2) whether the complaint alleged sufficient facts to support a basis for the violations of law alleged in the complaint.⁸ After

¹ Complaint L2026-01.

² *Id.* Complainant also alleged Respondent violated Colorado campaign finance law. *Id.* 2-3. Complainant has filed Campaign Finance Complaint 2026-18 against Respondent, raising the same allegations. The Division will address the allegations of violating campaign finance law in Complaint 2026-18.

³ Notice of Complaint L2026-01.

⁴ Rule 5.3.1 requires the Division to conduct an initial review of the complaint. 8 CCR 1505-8, Rule 5.3.

⁵ **These initial determinations are not a determination that Respondent has violated Colorado lobbying laws.**

⁶ See Rule 5.3.2, 8 CCR 1505-8.

⁷ Section 24-6-305(2), C.R.S. (authorizing the Secretary to adopt rules of enforcement for violations of sections 24-6-302 and 24-6-303, C.R.S.) and 8 CCR 1505-8, Rule 5.1.1.

⁸ 8 CCR 1505-8, Rule 5.3.1.

completing its Initial Review, the Division is required to take one of two steps: dismiss the complaint if the Division determines that the complaint does not contain the allegations required by Rule 5.3.1, or conduct an investigation.⁹

1. The Complaint identifies one or more potential violations of section 24-6-301 et seq., C.R.S.

Complainant alleges that Respondent lobbied without first registering with the Secretary of State's Office.¹⁰ Section 24-6-303(1), C.R.S., states:

- (1) Before lobbying, a professional lobbyist shall file an electronic registration statement with the secretary of state that contains:
 - (a) His or her full legal name, business address, and business telephone number;
 - (b) The name, address, and telephone number of his or her employer, if applicable;
 - (c) The name, address, and telephone number of the client for whom he or she will be lobbying; and
 - (d) The name, address, and telephone number of any other professional lobbyist for whom he or she is lobbying on a subcontract basis.¹¹

Section 24-6-301(3.5)(a) defines "lobbying" to include direct communication (or soliciting others to communicate) with a "covered official" for the purpose of aiding in or influencing that covered official in "the drafting, introduction, sponsorship, consideration, debate, amendment, passage, defeat, approval, or veto" on:

- (A) any bill, resolution, amendment, nomination, appointment, or report, whether or not in writing, pending or proposed for consideration by either house of the Colorado General Assembly, or committee thereof, or;

⁹ 8 CCR 1505-8, Rule 5.3.2.

¹⁰ Complaint L2026-01.

¹¹ Rule 2.1.1 also requires that a professional lobbyist register before lobbying. 8 CCR 1508, Rule 2.1.1.

(B) any other matter pending or proposed in writing by a covered official for consideration by either house of the General Assembly, or committee thereof.¹²

Under the statutory definition, lobbying can occur regardless of whether the General Assembly is in session.¹³ A “covered official” includes but is not limited to a member of the Colorado General Assembly, the director of research of the legislative council of the General Assembly, and any member of legislative council staff.¹⁴

The registration requirements of Section 24-6-303(1), et. seq., C.R.S., apply only to a “professional lobbyist.”¹⁵ Section 24-6-301(6) defines a “professional lobbyist” as “a person, business entity, including a sole proprietorship, or an employee of a client, who is compensated by a client or another professional lobbyist for lobbying.” A “client” essentially is the person who hires one or more lobbyists to lobby on behalf of that person.¹⁶

Unlike a professional lobbyist, a “volunteer lobbyist” is a lobbyist who is not being compensated for lobbying.¹⁷ Specifically, section 24-6-301(7), C.R.S., defines “volunteer lobbyist” as:

any individual who engages in lobbying and whose only receipt of money or other thing of value consists of nothing more than reimbursement for actual and reasonable expenses incurred for personal needs, such as meals, travel, lodging, and parking, while engaged in lobbying or for actual expenses incurred in informing the organization making the reimbursement or the members thereof of his lobbying.

Volunteer lobbyists need not register with the Secretary of State before lobbying but must register with the Colorado General Assembly.¹⁸

Here, Complainant alleged that “[o]ver 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.”¹⁹ Complainant then lists 8 bills that Respondent has allegedly supported. Complainant also indicates that Respondent’s campaign website has a section titled “Bills I Have

¹² The definition of “lobbying” includes certain other activities that not alleged in Complaint L2026-01.

¹³ Section 24-6-301(3.5)(a), C.R.S.

¹⁴ Section 24-6-301(1.7), C.R.S.

¹⁵ Section 24-6-303(1), C.R.S.

¹⁶ Section 24-6-301(1), C.R.S.

¹⁷ Section 24-6-301(7), C.R.S.

¹⁸ 8 CCR 1505-8, Rule 2.2.1. See also Rule 40(a), Colorado Legislative Rules (2025).

¹⁹ Complaint L2026-01 at 2.

Worked On” and that section lists lobbying efforts for some of those same bills and 3 additional bills.²⁰

Complainant has sufficiently alleged that Respondent is a lobbyist who is required to register before engaging in lobbying. If this allegation is true, Respondent’s failure to register is a violation of section 24-6-303(1), C.R.S. The Division initially determines that the Complainant alleges a violation of section 24-6-303, C.R.S., and therefore alleges one or more potential violations of section 24-6-301 et seq., C.R.S.

2. The Complaint contains sufficient facts to support a basis for the violations of law alleged in the Complaint.

Complainant alleged:

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 [sic] 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.

²⁰ Complaint L2026-01 at 2.

- 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.²¹

Based on these allegations in the Complaint, the Division initially determines that the Complainant has alleged sufficient facts that, if true, support a basis for the violations of law as alleged in the Complaint.

CONCLUSION

For the reasons stated above, the Division initially determines pursuant to Rule 5.3.1 that the Complainant identified one or more potential violations of section 24-6-301 et seq., C.R.S., and alleged sufficient facts to support a basis for those alleged violations of law.²² Pursuant to Rule 5.3.2(b), the Division will conduct an investigation. This Notice of Initial Review and Investigation shall serve as the required notice to Respondent and Complainant under Rule 5.3.2(b) that the Division has decided to conduct an investigation.

Dated March 30, 2026.

/s/ Alex Gentry
Alex Gentry
Campaign Finance Enforcement Legal Analyst
Elections Division
Colorado Secretary of State

²¹ Complaint L2026-01 at 2-3.

²² **These initial determinations are not a determination that Respondent has violated Colorado lobbying laws.**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this Notice of Initial Review and Investigation was served by electronic transmission this 30th day of March, 2026, to:

Complainant –

Bethany Morris

bethany@bethanyrosemorris.com

Respondent –

Iris Halpern

iris.halpern@iris4colorado.com

/s/ Alex Gentry

Alex Gentry

Campaign Finance Enforcement Analyst

Elections Division

Colorado Secretary of State