DISTRICT COURT, CITY & COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, CO 80202	
Plaintiffs: **SCOTT MOSS, in his individual capacity,** **COLORADO AFL-CIO**, and **TOWARDS JUSTICE**, v. Defendant: **JARED POLIS, in his official capacity**	▲ **Court Use Only** ▲
Attorneys for Plaintiffs: Laura B. Wolf, #46833 Stephen Shaw, #56720 SPARK JUSTICE LAW LLC 3435 S. Inca Street, Suite C-113 Englewood, CO 80110 (303) 802-5390 / (303) 848-3003 (f) laura@spark-law.com / steve@spark-law.com	Case Number: **2025CV32001** Courtroom: 215
FIRST AMENDED VERIFIED CIVIL COMPLAINT	

Plaintiffs Scott Moss, Colorado AFL-CIO, and Towards Justice, by and through their attorneys Laura B. Wolf and Stephen Shaw at Spark Justice Law LLC, and for this First Amended Verified Civil Complaint against Defendant Jared Polis, allege and aver as follows:

1. For years, Colorado has repeatedly reassured members of the public that they can use state services, including for reporting labor violations and claiming labor rights, without fear that Colorado will misuse their personal information by turning it over to federal immigration authorities to seize and deport them, their family members, their personal or professional contacts, or others. Colorado issued those assurances repeatedly in binding law, including in 2019 labor standards rules the Polis administration issued, and in legislation signed into law by Governor Jared Polis in 2021 and 2025. State investigators, agency directors, and Governor Polis himself touted those protections in many public and private reassurances to workers, immigrants, unions, community and professional service providers, and the public as a whole.

2. But in late spring 2025, barely one week after signing the 2025 law expanding the ban on disclosing personal information for purposes of federal immigration enforcement, Governor Polis directed state employees to violate these legal protections and assurances. He directed state employees to provide federal Immigrations and Customs Enforcement ("ICE") the personally identifying

information of at least dozens, and possibly far more, individuals in response to an administrative (not court-issued) subpoena that ICE served purportedly to enforce federal civil immigration law.

3. The Polis directive to collaborate with ICE is illegal. It also harms an unknown but potentially large number of state employees, by directing them to commit illegal acts, risking a wide range of professional and personal harms, including personal penalties of up to $50,000 per violation under the legislation Governor Polis himself signed into law.

4. As one of those state employees, and the supervisor of many others with less financial or personal ability to resist an illegal directive from the Governor, Moss protested – repeatedly, discreetly, and internally, and both verbally and in writing – that the ICE collaboration sought by Governor Polis was illegal, dangerous to state employees who would place themselves at personal risk by following illegal orders, harmful to Colorado residents, and a breach of the promises Governor Polis made and authorized that Colorado would not misuse its residents' PII by turning it over for immigration seizures. Though not given the opportunity to communicate these points directly to the Governor, he was told that despite his protests, he was expected to follow Polis's directive.

5. As a last resort, Moss, joined by the other above-captioned Plaintiffs, files this action seeking a judicial declaration and an immediate injunction against Governor Polis's directive to voluntarily produce documents in response to an ICE subpoena without a court order or other legal obligation. A judicial declaration and injunction is necessary to protect not only Moss, but also the other Plaintiffs who are key players in providing services to and protecting Coloradan workers and immigrants alike, and most importantly the immigrant workers and children Governor Polis wants to help ICE find, seize, and deport – after they trusted his promises and enactments that he would not place them at the mercy of federal anti-immigration forces.

PARTIES, JURISDICTION, AND VENUE

6. Scott Moss is a citizen of the State of Colorado. Since June 3, 2019, Moss has been Director of the CDLE Division of Labor Standards and Statistics ("DLSS") and an employee of the Colorado Department of Labor and Employment ("CDLE"), a state agency of the state of Colorado. Until 2019, Moss was a full-time professor at the University of Colorado Law School, and (with CDLE permission) continues to teach one course per year at the law school in most years, including each year since 2023.

7. Colorado AFL-CIO is a non-profit corporation under Colorado law with a principal place of business in Denver, Colorado. It has over 130,000 union members across its affiliate unions, including over 27,000 state employees, over 1,000 of whom are CDLE employees, in Colorado Workers for Innovative and New Solutions (Colorado WINS).

8. Towards Justice is a non-profit corporation under Colorado law with a principal place of business in Denver, Colorado. It represents, advises, advocates for, and protects the rights of primarily low-wage, often immigrant, workers, including in CDLE administrative complaints, claims, filings, and proceedings.

9. At all pertinent times, Jared Polis has been Governor of Colorado and a citizen of the State of Colorado. As Governor, Polis conducts official business out of the State Capitol located in the City & County of Denver. Further, the Governor's residence ("the Governor's Mansion") is

located in the City & County of Denver.

10. Moss was directed to commit the illegal acts described herein while working in the City and County of Denver.

11. Venue is proper in the District Court of the City and County of Denver, Colorado, pursuant to C.R.C.P. 98(c)(1), (5).

FACTUAL ALLEGATIONS

Colorado Repeatedly Enacts Bans on Disclosing PII for Federal Immigration Enforcement

12. **The ban on disclosing PII for federal immigration enforcement**: Twice since 2021, Governor Polis signed new laws directing that government agencies and employees "shall not disclose . . . personal identifying information that is not publicly available information for the purpose of investigating for, participating in, cooperating with, or assisting in federal immigration enforcement, including enforcement of civil immigration laws," yielding this ban in C.R.S. § 24-74-103 (emphases added):

> (1) **A state agency employee** or political subdivision employee **shall not disclose or make accessible**, including through a database or automated network, **personal identifying information that is not publicly available** information **for the purpose of investigating for, participating in, cooperating with, or assisting in federal immigration enforcement, including enforcement of civil immigration laws and 8 U.S.C. sec. 1325 or 1326**, except as required by federal or state law, including student visa sponsorship requirements for public institutions of higher education or requirements that are necessary to perform state agency or political subdivision duties, or as required to comply with a **court-issued subpoena, warrant, or order**.

13. The statute defines PII broadly as "information that may be used in conjunction with any other information, to identify a specific individual." C.R.S. § 24-74-102(1).

14. The statute provides the following non-exhaustive list of information that constitutes PII:

> a name; a date of birth; a place of birth; a social security number or tax identification number; a password or pass code; an official government-issued driver's license or identification card number; information contained in an employment authorization document; information contained in a permanent resident card; vehicle registration information; a license plate number; a photograph, electronically stored photograph, or digitized image; a fingerprint; a record of a physical feature, a physical characteristic, a behavioral characteristic, or handwriting; a government passport number; a health insurance identification number; an employer, student, or military identification number; a financial transaction device; a school or educational institution attended; a source of income; medical information; biometric data; financial and tax records; home or work addresses or other contact information; family or emergency contact information; status as a recipient of public assistance or as a crime victim; race;

ethnicity; national origin; immigration or citizenship status; sexual orientation; gender identity; physical disability; intellectual and developmental disability; or religion.

C.R.S. § 24-74-102(1).

15. **The 2021 Act**: ban on disclosing PII for federal immigration enforcement was enacted in Colorado Senate Bill 21-131 ("SB21-131"), signed by Governor Polis with an immediate effective date on June 25, 2021 (hereinafter, "the 2021 Act"). The 2021 Act added to C.R.S. Title 24 ("Government – State") a new Article 74 titled, "Protection of Personal Identifying Information" (hereinafter, "Article 74").

16. **The 2025 Act**: Colorado Senate Bill 25-276 ("SB25-276"), signed by Governor Polis with an immediate effective date on May 23, 2025 (hereinafter, "the 2025 Act"), amended the Article 74 ban on disclosing PII for federal immigration enforcement, expanding it from just state governments to cover political subdivisions as well, without narrowing the ban or expanding any exceptions.

17. Article 74 also clarifies that it "shall not interfere with **criminal investigations** or proceedings that are authorized by judicial process or to restrict a state agency employee or political subdivision employee from fully investigating, participating in, cooperating with, or assisting federal law enforcement agencies in **criminal investigations**." C.R.S. § 24-74-103(2) (emphasis added).

18. Governor Polis has taken, and continues to take, the position that Article 74 is lawful and constitutional, including signing both SB21-131 and SB25-276 into law, doing so without issuing a signing statement noting any legal or constitutional concerns with either bill, and defending the legality and constitutionality of Article 74 against a current and ongoing legal challenge filed in federal court by the federal government.

19. In August 2019, Moss wrote, and DLSS promulgated, rules with force of law that promise similar protections to those the legislature and Governor Polis adopted into Colorado statutes in Article 74, banning disclosure of not just "the immigration status," but any "information concerning the immigration status," of those who suffered possible wage and hour violations. DLSS has long applied this rule against disclosing "information concerning the immigration status" to include PII requested for "immigration enforcement" efforts to "locate unaccompanied alien[s]." The current version of those rules is as follows:

- 4.8: Immigration status is irrelevant to labor rights and responsibilities, and the Division shall assure that labor rights and responsibilities apply regardless of immigration status, including but not limited to as follows:
    - 4.8.1: The Division will not voluntarily provide any person or entity information concerning the immigration status of (a) a party to a wage claim, (b) a person offering information concerning a wage claim, or (c) a person with a relationship with anyone in categories (a) or (b).
    - 4.8.2: Any effort to use a person's immigration status to negatively impact the labor law rights, responsibilities, or proceedings of any person or entity

is an unlawful act . . . .

Colorado and Governor Polis Repeatedly Offer Public Reassurances that Colorado Will Not Disclose PII for Federal Immigration Enforcement

20. Governor Polis publicly reassured those protected by Colorado law – not only those who may be targeted by federal investigation, but also the state and local government employees who comprise nearly 5% of Colorado residents – that Colorado would not disclose PII for purposes of federal civil immigration enforcement:

a. "We're happy to cooperate on any criminal matter, but **if the federal government wants to enforce immigration laws, that should be on their dime, not on our dime**."[1]

b. "[W]**e won't share immigration status on non-criminal cases with the federal government**, nor should we."[2]

c. "We . . . remain committed to **enforcing** . . . **criminal laws**, **rather than** just being an extension of the government and focused on **federal immigration laws**."[3]

21. Based on the rules and statutory enactments detailed above, Plaintiffs and/or their members have assured a wide range of persons and entities – including immigrant workers, unions representing immigrant workers, community organizations, labor rights attorneys, and officials from multiple foreign consulates in Colorado – that state officials, including at CDLE, would not turn over information on immigrants obtained in labor investigations and labor filings for federal immigration enforcement.

ICE Serves a Civil, Administrative Subpoena for Immigration Enforcement that Is Not Self Executing and Which Has Not Been Approved by a Court of Law

22. On April 24, 2025, CDLE received from a federal executive agency an "**IMMIGRATION ENFORCEMENT SUBPOENA**" (caps and boldface in original) (hereinafter the "April 24th Immigration Enforcement Subpoena").

23. **From ICE.** The April 24th Immigration Enforcement Subpoena is a request for production to U.S. Immigration and Customs Enforcement ("ICE") within the U.S. Department of Homeland Security.

a. The subpoena bears on each page the federal agency logo and name "U.S. Immigration and Customs."

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[1] Ryan Warner, *Interview: Setting his agenda for 2025, Polis lays out strategies to stand up to hail and to Trump in 2025 State of the State*, Colorado Public Radio (January 10, 2025) (emphasis added).

[2] *Id.* (emphasis added).

[3] John Frank, *Colorado weighs cooperation with ICE authorities on immigration*, Axios Denver (Jan. 28, 2025) (emphasis added).

b. The subpoena says it is from the "Homeland Security Investigations" unit within ICE.

c. The subpoena asks that the requested production be made to a named executive official listed as a "Special Agent . . . at U.S. Immigrations and Customer Enforcement."

d. The first notice Moss received about the subpoena was an email from a state official that began: "An ICE subpoena has been received that is asking for information about the sponsors of unaccompanied minors . . . ."

24. **Administrative, Not Judicial.** The April 24th Immigration Enforcement Subpoena is an administrative, not judicial subpoena.

a. The subpoena is neither issued, approved, nor signed by a judge or magistrate judge.

b. The subpoena does not request that production be made for, or in, a judicial proceeding, only to the above-listed ICE special agent.

c. The subpoena states that the requested information is for "enforcement" efforts by an executive agency, specifically that it is "in connection with an investigation or inquiry relating to the enforcement of U.S. immigration laws."

25. **Civil, Not Criminal.** The April 24th Immigration Enforcement Subpoena is for civil, not criminal, proceedings.

a. Federal immigration law authorizing deportation of persons not lawfully in the United States is based upon civil, not criminal, law.

b. The title of the subpoena is "IMMIGRATION ENFORCEMENT SUBPOENA."

c. The first full sentence of the subpoena says the requests are "in connection with an investigation or inquiry relating to the enforcement of U.S. immigration laws."

d. The portion of the subpoena detailing the requests says the subpoena is for "investigative activities to locate unaccompanied alien children" and to "ensure that the children are being properly cared for."

e. As the federal government publicly explains, when minors who are not accompanied by a parent or legal guardian (unaccompanied alien children, or "UACs") are "apprehended by immigration authorities," they are ultimately released to "sponsors (usually family members), while they await immigration proceedings" of a civil nature that determine whether ICE

can deport them.[4]

f. The subpoena cites as authority 8 U.S.C. § 1225, a federal statutory provision that is neither a criminal statute nor authorization for criminal proceedings, and instead authorizes civil administrative proceedings to enforce federal immigration law, and which is part of a broader set of immigration statutes titled: "Part IV – Inspection, Apprehension, Examination, Exclusion, and Removal" (U.S.C. Chapter 12, Subchapter II, Part IV.)

g. The sole reference in the subpoena to possible "crimes" is, at the end of the sentence saying the purpose is "to locate" children previously apprehended for civil immigration proceedings, a disclosure that the scope of the agency's conduct may extend beyond merely locating the children, spanning an essentially unlimited range of theoretical civil and criminal child welfare issues, including to ensure that the children are "properly cared for," are not subjected to "crimes of human trafficking," and are not subject to any "other forms of exploitation" without limitation (which could include, for example, civil laws on child labor, child health, etc.).

h. The subpoena does not allege that there is an ongoing criminal investigation, nor does it cite any criminal law that has allegedly been violated or any probable cause supporting any unidentified criminal investigation.

26. **Disclosure of PII.**

a. The subpoena expressly requests the following information, all of which would result in the disclosure of PII:

- Copies of quarterly wage reports, supporting schedules, and employer information to include employer's name, physical address, phone number, and email addresses;
- Copies of Job Separation Documentation (i.e. unemployment benefits filings) and related documents;
- Copies of Healthy Families and Workplaces Act (HFWA) records;
- Copies of Family and Medical Leave Insurance (FAMLI) Program records; and
- Any other records that show the following information for the listed sponsors: address of residence, telephone number, and email address.

b. The subpoena then lists 35 individuals whose records are sought (referred to as "the Subpoena Population"). These individuals are defined as sponsors of unaccompanied alien children ("UACs").

[4] U.S. Department of Health & Human Services, Office of Refugee Resettlement, "Unaccompanied Alien Children Released to Sponsors by State" (last visited June 4, 2025).

c. Notably, the records sought could include PII of third parties – including the Subpoena's Population's household members, family members, coworkers, employers, and the UACs. For example, DLSS records may include a range of personnel and employment records that could list spouses, children, or other family as beneficiaries of employment benefits, emergency contacts, etc.; FAMLI records may include PII for household and family members, such as a non-spousal partner in the case of a FAMLI record created in response to a sponsor taking leave following the birth of a child. Thus, the population of individuals whose PII is at risk of being disclosed is far greater than the Subpoena Population and is referred to herein as "the Impacted Population."

The April 24th Immigration Enforcement Subpoena Is Served as Part of a Broader, National Campaign to Target UACs and Their Sponsors for Deportation

27. Since approximately January 27, 2025, ICE has been engaged in a national operation to locate and track unaccompanied alien children as part of its civil immigration enforcement efforts.

28. In line with these efforts, armed ICE agents have showed up to children's homes and schools, as well as nonprofit and charitable organizations assisting those children, unannounced and demanding information.

29. These operations extend throughout Colorado.

30. While claiming it is conducting these searches for the welfare of children, ICE refers to the UACs as "targets," not "victims of crime" or words to that effect.

31. The operation includes as its phase 1 priorities determining whether the UACs (1) are flight risks; (2) are public safety risks (i.e. criminals), and (3) have executable orders of removal.

32. The operation does not list as a priority determining whether UACs are *victims* of any crimes, including trafficking.

33. The operation includes as its phases 2 priorities pursuing orders for removal, with Homeland Security Investigations ("HSI") to provide operational planning to the Department of Enforcement and Removal Operations ("ERO").

34. In May 2025, Colorado Senator Michael Bennett called the operation troubling and the stories of ICE agents showing up at schools and homes unannounced worrisome.

Reversing the Initial Decision Not to Produce Information for the ICE Subpoena, Governor Polis Directs State Employees to Violate the Ban He Signed into Law by Disclosing PII to Federal Immigration Agents to Aid their Administrative Efforts to Find, Detain, and Deport Individuals for Civil Immigration Violations

35. Late on April 24, 2025, Moss was notified of and provided a copy of the April 24th Immigration Enforcement Subpoena.

36. Less than 24 hours later, Moss was notified that the Polis administration was analyzing its rights and options before any decision would be made as to how to respond to the subpoena.

37. In internal discussions within state government, Moss reported that it would be illegal to produce the PII requested by the ICE subpoena.

38. Moss was told by early May that the Polis administration had decided not to produce the PII requested by the subpoena.

39. Only weeks later, in the last week of May – and just before the May 26th production date ICE requested – Governor Polis personally decided, and state officials including Moss were notified, that Polis wanted CDLE to produce the PII requested by the ICE subpoena.

40. From the last week of May through the beginning of June, Moss repeatedly reiterated that it would be illegal to produce the PII requested by the ICE subpoena, verbally as well as in the memo attached as **Exhibit A** (which this complaint incorporates) that compiles, cites, and summarizes publicly available information about ICE abuses, applicable laws, and possible consequences of producing the PII requested by the ICE subpoena.

41. Governor Polis still did not indicate whether his decision was final until after the production date requested by ICE: On Friday, May 30, 2025, Moss was told that it was "80%" likely that Governor Polis would require the CDLE production that ICE requested. A meeting was thereafter scheduled for Monday, June 2, 2025, between Moss and other administration officials, to discuss Moss's objections.

42. Late in the afternoon on June 2, 2025, Moss was told that Governor Polis's decision was final that CDLE must produce the PII requested by the ICE subpoena.

43. Moss was told that Polis had declared the matter a "criminal investigation" because ICE's claimed efforts to locate immigrant children could conceivably protect them against child welfare violations, some of which could be civil, but others of which could be criminal. However:

a. Moss was told of, and knows of, no claim or evidence that the production request was made in connection with an actual, ongoing criminal investigation.

b. Moss was told of, and knows of, no claim or evidence of any crimes against any of the alien children being sponsored by the individuals listed in the subpoena.

c. Moss was told of, and knows of, no claim or evidence of any pattern of crimes against unaccompanied alien children in the custody of any sponsors in Colorado.

44. Nobody in the Polis administration ever disputed Moss's statement that the April 24th subpoena was an administrative subpoena that no court had issued, approved, or required to be complied with – consistent with Governor Polis treating the "date and time" listed in the subpoena as not a deadline, but as a requested date of production that Governor Polis had, upon information and belief, informed ICE the state would not meet.

45. A follow-up meeting was scheduled for the next day, on Moss's request.

46. After business hours on June 3, 2025, Moss was told that he had to produce the PII requested by the ICE subpoena by the end of the week, no later than June 6, 2025.

47. Governor Polis's ICE collaboration directive violates, and directs Moss and other state employees to violate, Article 74's ban on PII disclosure for federal immigration enforcement. Notably, Article 74 is currently being defended in federal court by Governor Polis such that his behind-the-scenes directive to violate the law was even more shocking to Moss.

48. Absent judicial intervention, Governor Polis's ICE collaboration directive imposes a choice between harmful options: illegal disclosure of PII of the Impacted Population to ICE for immigration enforcement, risking financial, licensing, professional, and/or reputational harm to Plaintiffs and state workers, and deeper harm to the immigrants who entrusted their PII to them; or, if state workers decline to commit the illegal act Governor Polis ordered, risk termination for Moss, and state employees.

An Administrative Subpoena Seeking PII for Purposes of Federal Immigration Enforcement is Only Enforceable by Court Order, Providing a Mechanism for Checks and Balances

49. Administrative subpoenas issued for purposes of federal immigration enforcement are only enforceable by court order. *See* 8 U.S.C. § 1225(d)(4)(B).

50. This process, which is provided under federal law, ensures agencies are not afforded an unchecked ability to demand compliance with subpoenas seeking information otherwise protected by constitutional or statutory law.

51. Even before the passage of Article 74, Coloradans enjoyed constitutional and statutory rights to privacy, including privacy in their financial data and health information sought in the April 24th Immigration Enforcement Subpoena.

52. These protections extend to everyone subject to the laws of the United States and Colorado, regardless of immigration status.

53. Article 74 expands on the type of information considered confidential and protects that information more categorically from disclosure for purposes of civil immigration enforcement, absent court order or other legal obligations to produce the records without a court order.

54. At no time has Governor Polis sought a court order directing the disclosure of the information sought in the April 24th Immigration Enforcement Subpoena, nor is there a separate legal obligation to disclose the information absent court order.

55. Governor Polis's decision to *voluntarily* produce constitutionally and statutorily protected, confidential information regarding Colorado citizens is a violation of Article 74, in addition to potentially violating constitutional protections of the Impacted Population.

Plaintiffs Face Significant Consequences if State Employees Comply with Directives to Violate the Ban on Disclosure of PII

56. State employees complying with directives to violate the ban on disclosure of PII for federal immigration enforcement, including Moss and the members of Colorado AFL-CIO, risk a wide range of significant, injurious consequences in their personal capacities, including: (a) statutory penalties and orders; (b) professional consequences; (c) personal liability to third parties; and (d) other personal consequences.

a. **Statutory penalties and orders**. The statutory ban on disclosing PII for federal immigration enforcement imposes significant, monetary consequences on state employees who commit violations: "**A state agency employee** or political subdivision employee who intentionally violates a provision of this article 74 is subject to an injunction and is liable for a civil penalty of not more than **fifty thousand dollars for each violation**." C.R.S. § 24-74-107(1) (emphasis added).

b. **Professional consequences:**

i. Professional Licensure: A state agency employee who has a professional license may be held to have violated their rules of professional conduct or responsibility if they disclose PII in violation of C.R.S. § 24-74-103 and thereby risk harming the vulnerable immigrant workers and children whom the law aims to protect. Moss, for example, holds a law license and, at DLSS, oversees more than 100 staff, including numerous other attorneys. The Rules of Professional Conduct for Colorado attorneys that Moss and his staff risk violating if they illegally disclose PII for federal immigration enforcement include:

- Rule 8.4, "Misconduct" by attorneys, covers "conduct that is prejudicial to the administration of justice," "any conduct that directly, intentionally, and wrongfully harms others and that adversely reflects on a lawyer's fitness to practice law," and conduct in "public office" per Comment 5 ("Lawyers holding public office assume legal responsibilities going beyond those of other citizens. A lawyer's abuse of public office can suggest an inability to fulfill the professional role of lawyers.").

- Rule 5.1, "Responsibilities of a Partner or Supervisory Lawyer," covers any directives Moss, as Director, would need to give to his staff, including attorneys, to execute violations of the C.R.S. § 24-74-103 ban on disclosing PII for federal immigration enforcement. *See* Colo. RPC 5.1 ("A lawyer having direct supervisory authority over another lawyer shall make reasonable efforts to ensure that the other lawyer conforms to the Rules of Professional Conduct.")

ii. **Professional Opportunities:** If PII that immigrant workers provide CDLE is illegally disclosed to ICE, then those who help immigrant workers benefit from state resources – including labor rights enforcement through DLSS, or unemployment insurance or other benefits through other parts of CDLE – risk losing professional opportunities due to immigrants:

- Losing trust in those, including Moss and Towards Justice, who reassured them that their PII would not be disclosed to ICE – a reassurance that was true until reneged upon by Governor Polis; and

- Losing trust in CDLE and other state agencies as a place to file claims for benefits or enforcement – harming those like Moss and Towards Justice who help workers understand and enforce their rights at DLSS. Moss has already begun executing plans to train students to provide legal services to low-wage immigrant workers through his teaching position at the University of Colorado, to begin as early as 2026, and Towards Justice currently serves immigrant workers and regularly refers workers to CDLE for enforcement of their rights under state law.

c. **Liability to Third Parties:** Disclosing PII in violation of C.R.S. § 24-74-103 could, if it causes any persons to face adverse action against them by federal immigration authorities, risk subjecting Moss and other state employees, including members of Colorado AFL-CIO, to liability for using their authority as government officials to injuriously violate the rights of third parties – injuries that are recognized as a matter of law in the Article 74 provision, signed into law by Governor Polis, finding that a violation of the disclosure ban "poses a real, immediate, and irreparable injury." C.R.S. § 24-74-107(3).

d. **Personal Consequences:** Moss is deeply troubled by being directed and pressured to execute Governor Polis's illegal and unethical directive to turn over PII of immigrant workers and children to ICE, especially after Moss wrote Colorado's first set of rules against such disclosures, then personally promised a wide range of stakeholders that Colorado would not turn workers over to ICE in violation of those rules and statutes Governor Polis signed into law. Similarly, Towards Justice is sharply limited in its ability to serve the workers that take advantage of its referral service, many of whom are immigrants seeking unpaid wages through state agencies, and Colorado AFL-CIO worries for the personal impacts to its members, many of whom may have a moral objection to providing information that is openly being used to separate children from their families and to expedite immigration proceedings.

57. Orders to violate Article 74 place state employees, including Moss, in the nearly impossible position of disobeying the Governor or risk significant monetary, professional, and/or personal consequences from committing illegal acts that harm immigrant workers and children.

Colorado AFL-CIO Faces Significant Consequences from Governor Polis's Directives to Violate the Ban on Disclosure of PII

58. Searching for PII sought by the April 24th Immigration Enforcement Subpoena, then compiling it to produce, requires effort by numerous CDLE employees, because the records are stored separately by various CDLE divisions (including DLSS, the Division of Unemployment Insurance, and the Division of Family and Medical Leave Insurance), and also stored separately by various programs within a Division (including multiple DLSS programs that store files in different systems). Other than a small minority exempt from Colorado WINS, all CDLE employees are among the 27,000 Colorado WINS members, and thus among the 180,000 union members within Colorado AFL-CIO. By requiring numerous of these union members to violate Article 74, Governor Polis is subjecting them to the wide range of significant, injurious consequences in their personal capacities noted above, i.e., (a) statutory penalties and orders; (b) professional consequences; (c) personal liability to third parties; and (d) other personal consequences.

59. Colorado AFL-CIO and multiple of its affiliate unions, including Colorado WINS, publicly supported the legislation yielding the current Article 74 ban on disclosing PII for federal immigration enforcement. That support includes ongoing efforts to assure compliance and protect state employees from being directed to commit violations — as in the mass-emailed communication from Colorado WINS to all its members who are CDLE employees on June 6, 2025, attached as **Exhibit B** (and incorporated into this complaint), which:

- Acknowledges that employees may already have seen reports, such as a news story the email links, "that state employees at CDLE have been told to comply with a federal subpoena by sharing Personal Identifying Information protected by State law";
- Notes that such reports "can cause confusion and uncertainty and leave employees with questions about what may be asked of them";
- Explains that "Section 24-74-103 of Senate Bill 276 clearly stipulates that State agency employees cannot "disclose or make accessible, including through a database or automated network, personal identifying information that is not publicly available information for the purpose of investigating for, participating in, cooperating with, or assisting in federal immigration enforcement"; and
- Offers assistance through a confidential phone line the union is staffing — "Our union is here to answer any questions you might have about your rights. If you have questions, please reach out to us by calling our confidential phone line at 720-908-6781"

Towards Justice Faces Significant Consequences from Governor Polis's Directives to Violate the Ban on Disclosure of PII

60. Governor Polis's illegal PII disclosure directive violates the above-detailed assurances (from the Polis administration and laws such as Article 74) that Towards Justice relied upon in:

a. advising immigrant workers that, to protect their and others' rights and benefits, they can submit claims and information to CDLE without fear their information will be voluntarily turned over for federal immigration enforcement against either those workers, their co-workers, their families, or others in their communities;

b. designing and managing the intake and referral service Towards Justice provides to Colorado workers seeking help with wage theft and related issues, which serves the community regardless of immigration status and which would require significant additional resources if Towards Justice could not safely provide workers with referrals to CDLE where appropriate regardless of immigration status; and

c. executing, or helping workers to execute, the workers' submissions to CDLE.

61. Governor Polis's illegal PII disclosure directives thereby injure Towards Justice by:

a. harming clients whom it represents — many of whom lack the ability to pursue their interests themselves, or with private sector attorneys, due to a range of barriers to access to justice; and

b. harming its ability to protect low-wage workers, pursuant to its non-profit mission and its professional responsibilities, because the Polis directives (i) undercut Towards Justice's advisements to trust the state to comply with the law and Polis administration assurances, (ii) impede Towards Justice's ability to safely provide appropriate referrals to the CDLE without regard to workers' immigration status, requiring it to expend additional resources redesigning its intake and referral service, and (iii) disincentivize workers from using Towards Justice services.

62. All claims in this Complaint are brought in good faith and are not frivolous and are filed for the purpose of extending, limiting, modifying, or reversing existing precedent, law, or regulation, including the laws and regulations that serve as the basis for the claims alleged herein, or for the purpose of establishing the meaning of the laws that serve as the basis for the claims alleged herein.

COUNT I
Violation of Protection of Personal Identifying Information, Article 74 of C.R.S. Title 24

63. Plaintiffs repeat and reallege all allegations above and below.

64. The April 24th Immigration Enforcement Subpoena, which is issued not by a court, but by federal Immigration and Customs Enforcement, directs the Colorado Department of Labor and Employment to produce PII that is not publicly available information for the purpose of investigating for, participating in, cooperating with, or assisting in federal immigration enforcement.

65. Polis has directed Moss and other state employees to produce PII in response to the subpoena, in violation of the Article 74 prohibition that protects the Impacted Population as well as state employees against exactly such unlawful directives.

66. Accordingly, Plaintiffs seek an immediate temporary restraining order, preliminary

injunction, and permanent injunction enjoining Polis from directing any state agency employee, including Moss, to respond to or otherwise produce PII in response to the April 24th Immigration Enforcement Subpoena absent a court order issued pursuant to 8 U.S.C. § 1225(d)(4)(B).

67. Finally, Plaintiffs seek any other legal or equitable relief to which they are entitled or that the court deems appropriate, including attorneys' fees and costs associated with this action.

COUNT II
Declaratory Judgments, Article 51 of C.R.S. Title 13

68. Plaintiffs repeat and reallege all allegations above and below.

69. The Colorado Uniform Declaratory Judgments Law, Article 51 of C.R.S. Title 13, provides as follows: "Any person . . . whose rights, status, or other legal relations are affected by a statute . . . may have determined any question of construction or validity arising under the . . . statute . . . and obtain a declaration of rights, status, or other legal relations thereunder." C.R.S. § 13-51-106.

70. Plaintiffs request a declaratory judgment that Colorado law prohibits state agency employees from responding to or otherwise producing PII in response to the April 24th Immigration Enforcement Subpoena absent a court order issued pursuant to 8 U.S.C. § 1225(d)(4)(B).

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that this Court enter judgment on their behalf and to award them all relief as allowed by law and equity, including, but not limited to, the following:

A. An immediate temporary restraining order, preliminary injunction, and permanent injunction enjoining Polis from directing any state agency employee to respond to or otherwise produce PII in response to the April 24th Immigration Enforcement Subpoena absent a court order issued pursuant to 8 U.S.C. § 1225(d)(4)(B).

B. A declaration as a matter of law that Colorado law prohibits state agency employees from responding to or otherwise producing PII in response to the April 24th Immigration Enforcement Subpoena absent a court order issued pursuant to 8 U.S.C. § 1225(d)(4)(B);

C. Attorneys' fees and the costs associated with this action, including expert witness fees, on all claims allowed by law;

D. Any other appropriate relief at law and equity that this court deems just and proper.

DATED: June 10, 2025

Respectfully submitted,

SPARK JUSTICE LAW LLC

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Attorneys on behalf of Plaintiffs

From: Scott Moss, CDLE Division of Labor Standards and Statistics Director

Re: Problems with complying with federal demands to produce state records to facilitate ICE deportations

Date: June 3, 2025

Following are points I'd like to emphasize as to serious problems posed by cooperating with the ICE subpoena to produce state records for federal administrative investigations for purposes of federal civil immigration enforcement. In short, cooperation would violate state law, risking personal liability for many state employees, and contravening assurances the Governor and state officials gave Coloradans who entrusted us with their and others' PII. Cooperation also would embroil Colorado as a collaborator with an ICE campaign that, all too often, has proven to be lawless, to target innocent persons, and to abuse children and adults alike.[1]

1. **This ICE request is explicitly an "immigration enforcement subpoena," to enforce civil federal immigration law, issued by the federal administrative agency conducting immigration enforcement.**

    a. The document title is "**IMMIGRATION ENFORCEMENT SUBPOENA**" (caps and boldface in original), and the text repeatedly says it's for investigation and enforcement of **federal civil immigration law**:

        i. The first full sentence says the records are being requested "in connection with an investigation or inquiry relating to the **enforcement of U.S. immigration laws**."

        ii. The request text says it's for "**investigative activities to locate** unaccompanied **alien** children**"** — although the actual request is for **labor-related records of 35 *adults* ages 20-45** (calling into question how any "children" could be "unaccompanied" if the inquiry is into 35 working adults).

    b. The subpoena expressly says it is for **U.S. Immigration and Customs Enforcement (ICE)**:

        i. Production is to be "**delivered to** [agent name] **at U.S. Immigration and Customs Enforcement**";

        ii. The agency logo and name in the footer of each page is "**U.S. Immigration and Customs**;" and

        iii. The subpoena is from the ICE investigations unit: "The Department of Homeland Security (DHS), **U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI)** is conducting investigative activities to locate unaccompanied alien children..."

    c. **The subpoena is for purposes of finding minors to deport**. It states that it is for "investigative activities to unaccompanied alien children (UAC)." As a federal website explains, UACs are **children who were** "**apprehended by immigration authorities**," then released to "sponsors (usually family members), while they **await immigration proceedings**."[2]

    d. Thus, the one reference to possible "crimes" is just a passing mention at the end of the subpoena's explanation of its express purpose and nature: An **administrative** investigation for ICE to **find minors it apprehended and aims to deport**. There's no real argument that every civil, administrative immigration subpoena is actually "criminal" just because a civil, administrative investigation *could* find crimes that *then might* trigger an *actual* criminal investigation.

    e. **An "administrative subpoena" is not an order authorizing penalties for non-compliance**, per the statute the subpoena cites as its authority (8 U.S.C. § 1225(d). So ICE would need to file a court case to enforce it, letting us argue why we shouldn't have to comply — and we "may only be penalized if a court orders enforcement ... and [we] then fail to comply."[3] "**There are many reasons why a subpoena may be invalid and unenforceable**" from ICE, including state sovereignty and personal privacy[4] —

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[1] Disclaimer: The points in this memo are not from my specialized knowledge, just summaries of points from media and other public reports, so I cite and hyperlink the sources, in case anyone wishes to check them.

[2] U.S. Department o fHealth & Human Services, Office of Refugee Resettlement, "Unaccompanied Alien Children Released to Sponsors by State."

[3] "[T]hese subpoenas are **not self-executing**. If a recipient does not comply[,] ... [ICE] must seek a court order.... Courts retain the power to consider recipients' legal challenges and assess the validity of each administrative subpoena." Cardozo Law School Immigration Justice Clinic, "ICE's Use of Subpoenas to Circumvent State & Local Laws."

[4] "Immigration subpoenas that request sensitive or private information may violate the Constitution. For example, subpoenas

important protections we'd waive by complying voluntarily without taking the opportunity to argue in court against all, or even just part, of a subpoena this broad.

2. **Complying with the subpoena would be illegal, and subject state workers to ruinous personal fines.**

   a. **Complying would violate our "Protection of Personal Identifying Information" statute**, since (as noted above) this subpoena is for neither criminal nor court-ordered proceedings (the key exceptions):

      > (1) **A state agency employee** or political subdivision employee **shall not disclose** ... **personal identifying information that is not publicly available** information **for the purpose of investigating for, participating in, cooperating with, or assisting in federal immigration enforcement, including enforcement of civil immigration laws and 8 U.S.C. sec. 1325 or 1326**, except as required by federal or state law, including student visa sponsorship requirements for public institutions of higher education or requirements that are necessary to perform state agency or political subdivision duties, or as required to comply with a **court-issued subpoena, warrant, or order**.
      >
      > (2) This article 74 shall not interfere with **criminal investigations** or proceedings that are authorized by judicial process or to restrict ... investigating, participating in, cooperating with, or assisting federal law enforcement agencies in **criminal investigations**.[5]

   b. **Violation would subject many state workers to ruinous personal fines**: "**A state agency employee** ... who intentionally violates ... this article 74 is subject to an injunction and is liable for a civil penalty of not more than **fifty thousand dollars** for **each violation** (C.R.S. 24-74-107(1)). There are 35 potential violations in this subpoena, totaling **$1.75 million for each worker**. But **even one $50,000 penalty is 50%-150% of the net pay** of state workers, so even one violation would be ruinous. Nor is it reassuring that fines are for only "intentional" violations; intent can be a tricky enough issue that it's not automatic exoneration for employees committing these illegal acts.

      Based on this frightening personal risk, which I haven't seen in my six years with the state, I've retained a personal attorney to advise me and protect my individual interests. I'm troubled that **lower-paid, less legally connected workers may lack the ability to similarly protect themselves with legal advice**.

3. **Complying would renege on assurances Governor Polis and state officials repeatedly offered that immigrants can use our services without fear we'll misuse PII they gave us, to help ICE seize them.**

   a. **Governor Polis has publicly reassured that we'll help ICE only to deport criminals, not to enforce federal immigration law** — sometimes expressly citing the "Protection of Personal Identifying Information" statute. Two of many examples:

      > **"Polis: Well, we have strong laws** as an example, that **we won't share immigration status on non-criminal cases with the federal government, nor should we**. We're happy to cooperate on any **criminal matter**, but **if the federal government wants to enforce immigration laws, that should be on their dime, not on our dime**."[6]
      >
      > "[T]o deport more immigrants convicted of crimes[,] 'We certainly are supportive of local law enforcement having constructive relationships with our federal law enforcement workers,' Polis told Axios .... [B]ut: **Polis draws a line when enforcing civil infractions. We 'remain committed to enforcing … criminal laws, rather than just being an extension of the government and focused on federal immigration laws,' he recently told reporters**."[7]

   b. **To encourage immigrants to file and report key labor information, CDLE has reassured that we**

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may implicate Fourth Amendment-protected **privacy rights** of states' and localities' residents (including U.S. citizens) or may be impermissibly **overbroad**. ... Of particular relevance for state and local government actors, there are arguments that some immigration subpoenas (individually or in the aggregate) violate **the constitutional rule against federal commandeering of state resources**." Cardozo Law School Immigration Justice Clinic, "ICE's Use of Subpoenas to Circumvent State & Local Laws."

[5] C.R.S. 24-74-103 (emphases added). The statute was enacted in S.B. 21-131 ("SB21-131") (signed and immediately effective June 25, 2021), then expanded to cover political subdivisions in S.B. 25-276 (signed and immediately effective May 23, 2025).

[6] Ryan Warner, *Interview: Setting his agenda for 2025, Polis lays out strategies to stand up to hail and to Trump in 2025 State of the State*, Colorado Public Radio (January 10, 2025).

[7] John Frank, *Colorado weighs cooperation with ICE authorities on immigration*, Axios Denver (Jan. 28, 2025).

won't report their PII to ICE — in meetings, presentations, and long-established rules barring multiple CDLE divisions from **sharing any "information concerning the immigration status"** of a worker.[8] These rules, which have force of law, cover not just "**the** immigration status," but any "information **concerning** the immigration status." Consistent with courts defining "concerning" to broadly include anything "relating to" or "evidencing" the topic: we've long said "information concerning the immigration status" includes PII requested for "immigration enforcement" efforts to "locate unaccompanied alien[s]."

4. **Giving PII to ICE would severely damage trust in state officials and agencies, by embroiling us in ICE raids that appear to be lawless or violent, to abuse children, or to target the innocent.**

   a. **As to apparent violence and lawlessness by ICE:**

      "[O]perations were taking place at apartment complexes and **without warrants** being shown."[9]

      "Immigration and Customs Enforcement ... conducted operations ... at at least four locations in Denver and Aurora.... A **video posted to social media by the Drug Enforcement Agency**'s Rocky Mountain Division showed agents **deploying a smoke grenade outside an apartment building**."[10]

      "ICE agents **us[ed] a hammer to smash the car window** and then ... **dragged him and his wife out of the car**. ... **He had no criminal record**, ... and was **in the process of applying for asylum**."[11]

      "[Agents] **dressed for combat** and **carr[ied] a battering ram** [and a] ... smoke or flash grenade thrown.... While the operation had the veneer of a criminal investigation, it was really an immigration operation designed to let ICE capture ... as many people as possible…. A Fox News report said ... **30 people were detained**. Though authorities ... wanted to capture 100 members of a Venezuelan gang ... , [the] report said **only one person** ... **had gang ties. No evidence of that tie was offered**."[12]

   b. **As to ICE dishonesty in justifying its deportation efforts**: ICE's aggressive enforcement has included troublingly dishonest divergence between what ICE claims it is doing, and what ICE actually does — as in these examples.

      "'[ICE] officers grabbed him and two other boys right at the entrance to our building. **One said, "No, he's not the one**" .... **But the other said, "Take him anyway**."'"[13]

      "[ICE] admitted ... an 'administrative error' and an 'oversight' resulted in a Salvadoran man's deportation and imprisonment in ... El Salvador, despite a legal order prohibiting his removal there. Although [ICE] ... **concedes it made a mistake when it deported Abrego Garcia, it is opposing a request for him to be brought back** ... Abrego Garcia was living in Maryland, alongside his wife and their disabled 5-year-old son, both ... U.S. citizens ... [T]he only evidence the government provided in support of his gang affiliation was that he was wearing a Chicago Bulls hat and hoodie and that a confidential informant said he was an active MS-13 member in a branch of the gang ... on Long Island ... , where Abrego Garcia ... never lived."[14]

      "The man, woman and small child left a courtroom ... on Stout Street after attending an immigration hearing .... **The dismissal of a removal case historically has meant the government decided to no longer pursue deportation** .... **But as the family left the courtroom with the dismissal order in hand, they were detained** .... [Family attorney] Brock asked the agents for a few minutes to talk with the family about their rights .... [T]he agents refused .... Three **U.S. immigration officials told the Associated Press that government attorneys were given the order on May 19 to start dismissing cases, knowing full well that federal agents would then have a free hand to arrest those same individuals as soon as they stepped out of the courtroom. All spoke on condition of anonymity because they feared losing their jobs**. "We are setting people up," Brock said of the

[8] Colorado Wage Protection Rules, 7 CCR 1103-7, Rule 4.8.1 (adopted in substantially identical form in August 2019).

[9] Brad Brooks, *US immigration raids target illegal immigrants in Aurora, Colorado*, Reuters (Feb. 5, 2025).

[10] Chase Woodruff, *ICE agents conduct operations in multiple Denver, Aurora locations*, Colo. Newsline (Feb. 5, 2025).

[11] A.P., ICE agents who smashed man's car window and detained him were looking for someone else, lawyer says (Apr. 17, 2025).

[12] Allison Sherry & Ben Markus, *Immigration raids in Colorado, both highly visible and cloaked in secrecy, rattle advocates and local authorities*, CPR News (Feb. 6, 2025).

[13] Paz Radovic, *Merwil Gutiérrez Was Taken From His House. Now He Is In El Salvador, Documented* (Apr. 14, 2025).

[14] Jacob Rosen, *Trump ICE Official Admits "Administrative Error" in Deporting Man to El Salvador Prison*, CBS (Apr. 1, 2025).

government's new strategy. ... The latest effort **includes people who have no criminal records** ....[15]

ICE's repeated displays of dishonesty — continuing claims of guilt undercut by even evidence they concede (the first two of the three examples above), as well as dishonestly claiming to dismiss their deportation cases yet then re-arresting the same small children and families (the third of the three examples above) — confirm the real **risk that we'd be collaborating with dishonest ICE detention and deportation tactics, including of innocent persons** whose innocence won't stop ICE at all. Becoming embroiled with unsavory ICE tactics was the experience of **a local government forced to discipline a local official involved** in the information that led to an erroneous ICE deportation.[16]

c. **<u>As to ICE abusing children</u>**: **Opposing ICE child abuse -- family separation, detaining children in cages, and other abusive deprivations** -- is consistent with state goals of protecting children and families: "'**We don't support efforts** ... **to break up families**' ... **Gov. Polis said**."[17] Yet this subpoena **asks Colorado find minors to be seized by ICE as it continues separating families**:

> "**[T]he latest deportations are part of the same corrosive system that tore families apart** eight years ago .... The father of the 2-year-old girl filed an emergency petition to keep her in the U.S., but she was nevertheless placed on a deportation flight before the courts opened…
>
> [T]he Trump administration has deported at least one mother to Cuba who requested to take her U.S. citizen child with her. ... Heidy Sánchez's **17-month-old daughter suffers from seizures and is still being breastfed. 'They never gave me the option** to take my daughter....'"[18]

While the administration just reclaimed control over ICE months ago, experience from prior years confirms how aggressively ICE executes family separations:

> "Inside an old warehouse ... , **hundreds of children wait in a series of cages** created by metal fencing. **One cage had 20 children inside**. Scattered about are bottles of water, bags of chips and large foil sheets intended to serve as blankets.... One teenager ... was helping care for a young child she didn't know .... **She was so traumatized that she wasn't talking** …. **She was just curled up in a little ball.'** ... [O]fficials at the facility scold[ed] a group of 5-year-olds for playing around in their cage.... There are no toys or books. But one boy nearby wasn't playing with the rest. ... **[H]e was quiet, clutching** ... **a photocopy of his mother's ID card**."[19]

Worse, federal officials admit the harshness of family separation is a goal, not a regrettable upshot:

> [D]ocuments and government emails analyzed establish that officials **deliberately separated children** from their parents **as a deterrent** to other families who might otherwise enter .... Senior officials **intervened to keep children apart** from their parents **when federal agencies began reuniting** families .... [T]he government **refused, in many cases for days or weeks, to disclose the circumstances and whereabouts of separated children to their parents**, which meets the definition of an enforced disappearance .... A federal judge observed, in fact, that the government kept better records of property than of the children in its care."[20]

In short, this sort of subpoena compliance stopped being a viable option once Governor Polis signed a law banning exactly this sort of immigration enforcement collaboration, on threat of fining state workers heavily, leading Governor Polis and state officials to reassure immigrants they can safety provide us information without fear — all against a backdrop of abusive practices by the ICE officials we'd be telling where to raid.

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[15] Shelly Bradbury, *Feds detain immigrant family at Denver courthouse amid new Trump strategy*, Denver Post (May 30, 2025).

[16] *See, e.g.* Jacob Rosen, *Trump ICE Official Admits "Administrative Error" in Deporting Man to El Salvador Prison*, CBS (Apr. 1, 2025) (city police department had to suspend police detective after improper ICE enforcement based on local collaboration).

[17] Paige Reynolds, *Governor Polis talks immigration with KRDO13 following his 2025 State of the State*, KRDO (Jan. 9, 2025).

[18] Schuyler Mitchell, *Trump's Immigration Crackdown Is the Same Old Cruel Policy of Family Separation*, Truthout (May 7, 2025).

[19] Nomaan Merchant, *Hundreds of Children Wait in Border Patrol Facility in Texas*, AP News (Jun. 18, 2018).

[20] *US: Lasting Harm from Family Separation at the Border: Plot by Senior Officials, Some Slated for New Posts, to Discourage Migrants*, Human Rights Watch (Dec. 16, 2024).

---------- Forwarded message ----------
From: **Diane Byrne, COWINS President** <info@cowins.org>
Date: Fri, Jun 6, 2025 at 10:19 AM
Subject: Lawsuits and Your Rights
To: Hilary Glasgow <hilary.glasgow@cowins.org>

Hilary,

As you may have seen in news reports, a lawsuit filed this week alleges that state employees at CDLE have been told to comply with a federal subpoena by sharing Personal Identifying Information protected by State law.

We know that stories like these can cause confusion and uncertainty and leave employees with questions about what may be asked of them.

Section 24-74-103 of Senate Bill 276 clearly stipulates that State agency employees cannot "disclose or make accessible, including through a database or automated network, personal identifying information that is not publicly available information for the purpose of investigating for, participating in, cooperating with, or assisting in federal immigration enforcement."

Our union is here to answer any questions you might have about your rights. **If you have questions, please reach out to us by calling our confidential phone line at 720-908-6781.**

In unity,

Diane Byrne
President of Colorado WINS

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