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| DISTRICT COURT, WELD COUNTY, COLORADO 901 9th Ave, Greeley, CO 80631 | DATE FILED September 24, 2025 11:25 AM FILING ID: 44F84F74E401F CASE NUMBER: 2025CV30931 |
| STATE OF COLORADO, <i>ex rel.</i> PHILIP J. WEISER, ATTORNEY GENERAL | |
| Plaintiff, v. US IMMIGRATION SERVICES; COLORADO GLOBAL SCHOOLS; and SHINETH CUNANAN GONZALES, individuals | |
| Defendants. | ▲ COURT USE ONLY ▲ |
| PHILIP J. WEISER, Attorney General LAUREN M. DICKEY, 45773* First Assistant Attorney General KATHERINE M. FIELD, 42024* Senior Assistant Attorney General CONOR A. KRUGER, 54111* Assistant Attorney General Ralph L. Carr Judicial Center 1300 Broadway, 10th Floor Denver, CO 80203 Telephone: (720) 508-6216 FAX: (720) 508-6040 *Counsel of Record | Case No. Div.: |
| COMPLAINT | |

Plaintiff Philip J. Weiser, Attorney General for the State of Colorado, in his official law enforcement capacity, alleges as follows:

INTRODUCTION

1. Immigration in the United States is long, costly, and complicated process. For many, the immigration process is also emotional, full of both hope and fear. These factors create conditions that are ripe for exploitation: vulnerable consumers, facing an increasingly complex and expensive regulatory regime.

2. Recognizing this potential for exploitation, Colorado has implemented specific statutory protections for consumers seeking immigration assistance.

3. In particular, Colorado law prohibits nonlawyers, or those not otherwise authorized by federal law, from advising or assisting another person in determining his or her immigration status, applying for an immigration benefit, or preparing and selecting legal documents affecting the right of another in an immigration matter. C.R.S. § 6-1-727. A violation of this law constitutes a deceptive trade practice under the Colorado Consumer Protection Act (CCPA). *Id.*

4. Defendant Shineth Gonzales and her businesses Defendant US Immigration Services (USIS) and Defendant Colorado Global Schools (CGS) (also known as the “Colorado School”) have violated this law, and thus violated the CCPA, by engaging in the unlicensed practice of law and by advertising and providing unlawful immigration services to the public.

5. Since at least 2022, Gonzales and the defendant businesses have advertised that they provide legal services for immigration clients. Gonzales has advised her clients about what immigration forms to file and what actions to take to obtain legal status, has selected and filled out immigration forms for her clients, and has represented to individuals and in advertising that she is qualified to provide immigration guidance, that she possesses a law degree, and that she engages with immigration attorneys on cases.

6. Since at least 2022, Gonzales has also selected and prepared immigration forms for Colorado consumers.

7. Gonzales was the CEO of USIS and the President of the Colorado School, and engaged in the unlawful activity alleged in this Complaint substantially through those immigration service entities. Through both entities, Gonzales provided unqualified legal advice that adversely impacted consumers through the immigration process.

8. Gonzales and others at USIS and the Colorado School advertised immigration assistance services as a way to bring in revenue for themselves.

9. Neither USIS nor the Colorado School employed a single lawyer authorized to provide legal advice on immigration.

10. Nor did USIS or the Colorado School employ a single paralegal.

11. Not deterred by that fact, Gonzales and the defendant entities advertised that they had the ability to provide legal advice and representation to immigration clients, as well as other high-quality immigration assistance services.

12. Defendants could not provide such services under Colorado law.

13. Defendants caused significant harm to the consumers who entrusted their legal matters to them by providing poor, unqualified legal and immigration advice that negatively impacted consumers' immigration process through errors in paperwork.

14. The State brings this action under the Colorado Consumer Protection Act, Colo. Rev. Stat. §§ 6-1-101, *et seq.* to put an end to the unlawful and deceptive conduct of Defendants Gonzales, US Immigration Services, and the Colorado Global Schools, and to secure all other appropriate relief under the CCPA.

PARTIES

15. Philip J. Weiser is the duly elected Attorney General of the State of Colorado and is authorized under C.R.S. § 6-1-103 to enforce the provisions of the CCPA.

16. Defendant US Immigration Services (USIS) is a Colorado corporation, formed on August 7, 2022, with its principal place of business located at 1814 22nd St, Greeley, CO 80631. As of August 1, 2025, USIS is delinquent in its registration with the Colorado Secretary of State.

17. USIS operated in conjunction with Defendant Colorado Global Schools, both under the direction Defendant Gonzales.

18. Colorado Global Schools (CGS) also known as the "Colorado School," is a Colorado corporation, formed on December 3, 2020, with its principal place of business located at 3344 11th Ave, Colorado Global Schools, Evans, CO 80620.

19. Defendant Shineth Gonzales resides in Evans, Colorado.

20. At all times relevant to this Complaint, acting alone or in concert with others, Gonzales directed the activities of USIS and the Colorado School, including the acts and practices set forth in this Complaint.

JURISDICTION AND VENUE

21. Pursuant to C.R.S. §§ 6-1-103 and 6-1-110(1), this Court has jurisdiction to enter appropriate orders prior to and following an ultimate determination of liability.

22. The violations alleged herein occurred, in part, in Greeley, Colorado. Therefore, venue is proper in Weld County, Colorado, pursuant to C.R.S. § 6-1-103 and Colo. R. Civ. P. 98.

RELEVANT TIMES

23. The conduct that gives rise to the claims for relief contained in this Complaint began no later than 2022 and was ongoing through at least July 2024.

24. This action is timely brought pursuant to C.R.S. § 6-1-115 in that it is brought within three years of the date on which the last in a series of false, misleading, or deceptive acts or practices occurred.

GENERAL ALLEGATIONS

I. Gonzales and USIS misrepresented their qualifications and services to consumers.

A. Gonzales misrepresented her education.

25. Ms. Gonzales has referred to herself as Dr. Gonzales since at least 2021. But Ms. Gonzales does not possess a doctorate degree from any accredited educational institution in the United States. Ms. Gonzales states that she received an honorary doctorate, not an academic degree, from an institution in Haiti.

26. Gonzales misrepresented her legal education to consumers.

27. Gonzales represented multiple times that she possessed a Juris Doctor (JD) or “Doctor of Law” degree. For example, Ms. Gonzales has claimed to possess a JD from Harvard Law School on her LinkedIn profile.

28. Gonzales does not possess a JD from Harvard Law School nor a JD from any university.

29. Gonzales doubled down on this education misrepresentation in emails to consumers by referencing alleged quotes from her Harvard Law School professor.

30. Gonzales's misrepresentations about her education led many consumers to trust her with their immigration matters, believing that she had the education and competence to handle their complicated matters.

B. Gonzales, USIS, and the Colorado School misrepresented their ability to provide immigration representation.

31. Gonzales was the principal of the Colorado School and oversaw its immigration program.

32. Gonzales was the CEO of USIS and oversaw its immigration program.

33. Gonzales sent emails to consumers from these defendant entities that purported to come from "our legal department" when no such department existed.

34. The contract for immigration assistance from the Colorado School falsely stated that it could provide legal advice and representation on immigration issues.

35. While acting as principal of the Colorado School, Gonzales oversaw the use of the identity "Shequioa Daniels" in communications with clients.

36. Daniels had the title of "Legal Consultant" and represented herself as having the ability to provide legal advice to consumers.

37. Shequioa Daniels is not a real person. Daniels is an imagined individual, created and used by Gonzales and others at the Colorado School.

38. Daniels was also listed as an attorney on multiple enrollment forms for consumers enrolled in the Immigration Assistance Program at USIS.

39. Gonzales signed off on the enrollment forms purported to be signed by Daniels, knowing that Daniels was not real and that the consumer would not be assigned an attorney on their case.

40. In February 2024, Gonzales emailed clients saying "the expansion of our clientele necessitates additional support, leading to our decision to engage the services of an attorney. Consequently, effective February 11, we will implement a monthly charge of \$555 for providing case updates and \$139 for conducting follow-ups."

41. Defendants did not engage with any attorney licensed in any US jurisdiction or otherwise authorized to provide legal advice.

42. Gonzales wrote to clients that materials had “been prepared by our paralegal.”

43. USIS and CGS did not employ any paralegals.

II. Defendants engaged in unlawful immigration services.

44. Gonzales presented herself as someone with expertise in immigration law.

45. For example, Gonzales posted an advertisement to her Facebook profile claiming that she was in “Expert in All Immigration Law.”

46. Gonzales also referred to herself in advertisements as “Your Trusted Law Immigration Law Firm Owner,” despite not being a lawyer, employed at a law firm, or the owner of a firm.

47. Through these and other actions, Gonzales implied that she possessed professional legal skills or expertise in the area of immigration law despite not possessing such professional legal skills or expertise.

48. Gonzales has never been licensed or otherwise authorized to practice law in this state pursuant to Colorado supreme court rules and article 93 of title 13.

49. Gonzales has never been authorized, under federal law, whether acting through a charitable organization or otherwise, to represent others in immigration matters.

50. Likewise, the materials created by USIS and CGS included clauses that amounted to the unauthorized practice of law and the offering of unlawful immigration assistance.

51. For example, in the contract for Provisional Unlawful Presence Waiver, Defendants state that “We draft your 1-130 application package, and send you the final draft for your review and signature, and you return it, along with the payment as required by USCIS in check or cash. Once we received the signed applications, we send it to USCIS for filing.”

52. Gonzales and USIS selected legal documents for immigration clients to complete in their immigration matters.

53. Gonzales and USIS drafted legal documents for immigration in their immigration matters.

54. Gonzales and USIS completed legal documents for immigration clients in their immigration matters.

55. No employee of USIS or the Colorado School has ever been licensed or otherwise authorized to practice law in this state pursuant to Colorado supreme court rules and article 93 of title 13.

56. No employee of USIS or the Colorado School has ever been authorized, under federal law, whether acting through a charitable organization or otherwise, to represent others in immigration matters.

III. Defendants charged consumers high fees for their unlawful services.

57. Defendants charged an exorbitant fee for their unlawful services.

58. Defendants charged \$17,300 for an Unlawful Provisional Waiver.

59. Defendants charged a rate of \$130 per hour for their immigration assistance services.

60. In 2023, Defendants added a monthly retainer for clients that had been with the organization for more than 12 months, reasoning that “[a]ll agencies and law offices are charging an hourly and monthly rate.”

61. Defendants could not provide these services, much less charge for them. These exorbitant fees exploited vulnerable consumers to the financial benefit of Defendants.

62. Multiple consumers had to hire licensed attorneys to correct the mistakes made by Defendants in their immigration paperwork.

PLAINTIFF'S CLAIMS

FIRST CLAIM FOR RELIEF

(Against all Defendants)

(Knowingly or recklessly makes a false representation as to the characteristics, ingredients, uses, benefits, alterations, or quantities of goods, food, services, or property or a false representation as to the sponsorship, approval, status, affiliation, or connection of a person therewith; C.R.S. § 6-1-105(1)(e)).

63. Plaintiff incorporates herein by reference all allegations set forth above.

64. Defendants have violated C.R.S. § 6-1-105(1)(e), by advertising that they are immigration experts and/or can legally offer immigration services and advice.

65. These advertisements and statements suggested that Defendants were practicing with the approval of the Colorado Supreme Court or are affiliated with licensed attorneys. They are not.

66. By means of the above-described unlawful deceptive trade practices, Defendants have deceived, misled, and unlawfully acquired money from Colorado consumers and consumers in other states.

SECOND CLAIM FOR RELIEF

(Against all Defendants)

(Practicing immigration law without a license or other authorization; C.R.S. § 6-1-727 and C.R.S. § 6-1-105(1)(x)).

67. Plaintiff incorporates herein by reference all allegations set forth above.

68. Section (x) of C.R.S. § 6-1-105(1) designates as a deceptive trade practice any violation of Section 7 of the Colorado Consumer Protection Act.

69. Defendants have violated Section 7, C.R.S. § 6-1-727, which prohibits nonlawyers or those not otherwise authorized by federal law from advising or assisting another person in determining his or her immigration status, applying for an immigration benefit, or preparing and selecting legal documents affecting the right of another in an immigration matter.

70. Defendants assisted Colorado consumers in applying for immigration benefits. In so doing, they selected, prepared, and submitted documents that affected the rights of consumers in immigration matters.

71. Defendants falsely claimed that they possessed professional legal skills or expertise in the area of immigration law.

72. By means of the above-described unlawful deceptive trade practices, Defendants have deceived, misled, and unlawfully acquired money from Colorado consumers and consumers in other states.

THIRD CLAIM FOR RELIEF

(Against Defendant Gonzales)

(Claiming either orally or in writing, the title "Dr." before a person's name without a doctoral degree from an institution listed in this subsection C.R.S. § 6-1-707(1)(a)(I); C.R.S. § 6-1-707(1)(a)(III)).

73. Plaintiff incorporates herein by reference all allegations set forth above.

74. Defendant Gonzales has used the title "Dr." in her business, vocation, or occupation.

75. Defendant Gonzales does not possess a doctoral degree from an institution that is accredited by a regional or professional accrediting agency recognized by the United States department of education or the council on postsecondary accreditation or is recognized as a candidate for accreditation by such an agency.

76. Defendant Gonzales does not possess a doctoral degree from an institution that is provided, operated, and supported by a state government or any of its political subdivisions or by the federal government.

77. Defendant Gonzales does not possess a doctoral degree from a school, institute, college, or university chartered outside the United States, the academic degree from which has been validated by an accrediting agency approved by the United States Department of Education as equivalent to the baccalaureate or postbaccalaureate degree conferred by a regionally accredited college or university in the United States.

78. Defendant Gonzales does not possess a doctoral degree from a religious seminary, institute, college, or university that offers only educational programs that prepare students for a religious vocation, career, occupation, profession, or lifework, and the nomenclature of whose certificates, diplomas, or degrees clearly identifies the religious character of the educational program.

79. Defendant Gonzales has used the title Dr. in the course of her business, vocation, or occupation without possessing a doctoral degree from an approved institution.

80. By means of the above-described unlawful deceptive trade practices, Defendants Gonzales has deceived, misled, and unlawfully acquired money from Colorado consumers and consumers in other states.

RELIEF REQUESTED

WHEREFORE, Plaintiff prays for judgment against the Defendants and the following relief:

A. An order declaring Defendants' above-described conduct to be in violation of the Colorado Consumer Protection Act, C.R.S. §§ 6-1-105(1)(e),(x); § 6-1-707; and § 6-1-727.

B. An order permanently enjoining Defendants, their officers, directors, successors, assignees, agents, employees, and anyone in active concert or participation with any Defendant with notice of such injunctive orders, from engaging in any deceptive trade practice as defined in and proscribed by the CCPA, and as set forth in this Complaint.

C. Additional appropriate orders necessary to prevent Defendants' continued or future deceptive trade practices.

D. A judgment in an amount to be determined at trial for restitution, unjust enrichment, or other equitable relief pursuant to C.R.S § 6-1-110(1) and C.R.S. § 18-17-106.

E. An order requiring Defendants to forfeit and pay to the General Fund of the State of Colorado civil penalties in an amount not to exceed \$20,000 per violation pursuant to C.R.S. § 6-1-112(1)(a), or \$50,000 per violation pursuant to C.R.S. § 6-1-112(1)(c).

F. An order requiring Defendants to pay the costs and expenses of this action incurred by the Attorney General, including, but not limited to, Plaintiff's attorney fees, pursuant to C.R.S. § 6-1-113(4).

G. Any such further orders as the Court may deem just and proper to effectuate the purposes of the CCPA.

Respectfully submitted this 24th day of September, 2025.

PHILIP J. WEISER
Attorney General

/s/ Conor A. Kruger
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