

Arapahoe County District Court 7325 S. Potomac St Centennial, CO 80112 Plaintiff: Jason Anderson, an individual, and all similarly situated individuals. v. Defendant: City of Aurora, a Colorado Municipal Corporation	DATE FILED June 10, 2026 1:53 PM FILING ID: E7B2E41BDD624 CASE NUMBER: 2026CV31577 COURT USE ONLY
Attorney for Jason Anderson: Alexander Dorotik Ingenuity Law Colorado 3000 Lawrence St Denver, CO 80205 (720)980-4138 Alex@Ingenuitylawcolorado.com Atty. Reg. #: 37121	Case No: Division:
COMPLAINT (CLASS ACTION)	

Plaintiff, Jason Anderson, hereby files this Complaint against Defendant, City of Aurora, on behalf of himself and all similarly situated individuals.

INTRODUCTION

1. In 2023, the Colorado Legislature passed SB 23-200, which amended C.R.S. § 42-4-110.5 (2)(a)(IV) to require a municipality to set a deadline of “not less than forty-five days after the issuance date on the notice of violation” for a violation issued by use of automated vehicle identification systems”.

2. On December 17, 2025, Aurora began citing drivers by use of automated photo speed enforcement cameras. When issuing citations, Aurora automatically sets a date to either pay or appeal a citation at 30 days from the date of issuance in blatant and intentional violation of state law.

PARTIES

3. Plaintiff Jason Anderson is a private citizen who received a citation from Defendant in Arapahoe County, Colorado for a speeding violation on February 27, 2026 with a payment/appeal due date of March 29, 2026. Thousands of similarly situated persons have also received similar citations with payment/appeal due dates 30 days later.

4. Defendant is the City of Aurora, a Colorado Municipal Corporation.

JURISDICTION

5. Jurisdiction is proper in this Court.

6. Venue is proper in this district as the alleged violation occurred in this district, and Plaintiff and similarly situated class members suffered damages in this county and state.

FACTS

7. C.R.S. § 42-4-110.5 (2)(a)(IV) was amended in 2023 to require a municipality to set a deadline of “not less than forty-five days after the issuance date on the notice of violation” for a violation issued by use of automated vehicle identification systems”.

8. When Aurora cites drivers by use of automated photo speed enforcement cameras it automatically sets a date to either pay or appeal a citation at 30 days from the date of issuance of the citation.

9. If a receiver of a citation fails to respond within 30 days to the citation, a default judgment is entered against said “defendant”.

10. State Senator Leslie Harod, a sponsor of the bill amending C.R.S. § 42-4-110.5 (2)(a)(IV) has stated that the forty-five day response period was deliberately put in the bill and was intended to apply to all municipalities within Colorado.

11. Aurora Spokesperson Jennifer Soules has stated that Aurora is aware of C.R.S. § 42-4-110.5 (2)(a)(IV) and does not intend to comply.

12. Aurora Spokesperson Jennifer Soules has stated that Aurora is aware of C.R.S. § 42-4-110.5 (2)(a)(IV) and it willfully violating it.

13. There is a link to C.R.S. § 42-4-110.5 (2)(a)(IV) on the City of Aurora website describing the automated photo speed enforcement camera program.

14. Aurora is in direct violation of C.R.S. § 42-4-110.5 (2)(a)(IV).

15. Aurora is intentionally and willfully violating C.R.S. § 42-4-110.5 (2)(a)(IV).

CLASS ACTION ALLEGATIONS

16. Class Definition: Plaintiff brings this case under Rule 23(b)(2) and (b)(3) on behalf of himself and a Class of similarly situated individuals defined as follows: “All persons who received a speeding violation as a result of detection on a speed camera and, upon receipt of the violation notice, were given less than 45 days to respond to the violation.” Excluded from the Class are: (1) any Judge or Magistrate presiding over this action and members of their families; (2) Plaintiff’s counsel and Defendant’s counsel; and (3) the legal representatives, successors, and assigns of any such excluded persons.

17. Numerosity: Class members are so numerous that joinder of all is impracticable. Upon information and belief, there are millions of people in the proposed Class.

18. Commonality and Predominance: There are questions of law and fact common to the Class that predominate over any questions affecting only individual Class Members. Common questions

include, among others, whether (1) Defendant is in violation of C.R.S. § 42-4-110.5 (2)(a)(IV); (2) whether said violation is willful and wanton; and (3) the amount and nature of such relief to be awarded to Plaintiff and the Class.

19. Typicality: All of Plaintiff's claims are typical of the claims of the Class as all proposed members were similarly harmed. Plaintiff and all Class Members are not given the amount of time to respond to the citation required by C.R.S. § 42-4-110.5 (2)(a)(IV).

20. Adequate Representation: Plaintiff is an adequate representative because his interests do not conflict with the interests of the Class he seeks to represent, he has retained counsel competent, and he and his counsel intend to prosecute this action vigorously. The interests of the Class will be fairly and adequately protected by Plaintiff and Plaintiff's counsel.

21. Predominance and Superiority: A class action is superior to all other available means of fair and efficient adjudication of the claims of Plaintiff and members of the Class. The injuries suffered by each individual Class Member are relatively small in comparison to the burden and expense of the individual prosecution of the complex and extensive litigation necessitated by Defendant's conduct. It would be virtually impossible for members of the Class individually to redress effectively the wrongs done to them. Even if the members of the Class could afford such individual litigation, the court system could not. Individualized litigation presents the potential for inconsistent or contradictory judgments, and it increases the delay and expense to all parties and the court system which are presented by the complex legal and factual issues of the case. By contrast, the class action device presents far fewer management difficulties and provides the benefits of a single adjudication, an economy of scale, and comprehensive supervision by a single court. Moreover, Class Members can be readily identified and notified based on, inter alia, Defendant's records.

22. Defendant has acted and has refused to act on grounds generally applicable to the Class, thereby making appropriate final equitable relief with respect to the Class as a whole.

FIRST CLAIM FOR RELIEF (Violation of C.R.S. § 42-4-110.5 (2)(a)(IV))

23. Anderson and similarly situated parties incorporate herein by reference the allegations set forth in paragraphs 1 through 20 of this Complaint.

24. Aurora has directly violated C.R.S. § 42-4-110.5 (2)(a)(IV) by not providing the required time to respond to the Automated vehicle identification system citations.

25. As a result, Colorado drivers have been made to pay hundreds of thousands of dollars illegally to the Aurora and contrary to the law of Colorado.

SECOND CLAIM FOR RELIEF (Violation of the Colorado Consumer Protection Act - C.R.S. §6-1-105)

26. Anderson and similarly situated parties incorporate herein by reference the allegations set forth in paragraphs 1 through 24 of this Complaint.

27. Defendant has knowingly engaged in any unfair, unconscionable and deceptive practice in violation of C.R.S. §6-1-105(rrr).

THIRD CLAIM FOR RELIEF (Declaratory Judgment, C.R.C.P. 57 and C.R.S. § 13-51-101, et seq.)

28. Anderson and similarly situated parties incorporate herein by reference the allegations set forth in paragraphs 1 through 25 of this Complaint.

29. Anderson (and similarly situated Plaintiffs) and Aurora have a dispute over the construction, interpretation, application, validity, and constitutionality of certain provisions within C.R.S. § 42-4-110.5 (2)(a)(IV).

30. Anderson's rights, status, or other legal relations are directly and adversely affected by these Code provisions and by the positions taken by Aurora with respect to these Code provisions.

31. Anderson seeks declaratory relief from the Court in order to terminate the controversy between the parties and to settle and afford relief from his uncertainty and insecurity with respect to his rights, status, or other legal relations.

WHEREFORE, Plaintiff and the proposed Class respectfully request that the Court:

- a. Certify this case as a class action and appoint Plaintiff as Class Representative and his counsel as Class Counsel;
- b. Declare that Defendant's actions as set forth in this Complaint violate C.R.S. § 42-4-110.5 (2)(a)(IV).
- c. Declare that Defendant's actions as set forth in this Complaint violate C.R.S. §6-1-105(rrr).
- d. Award Plaintiff and the Class damages in an amount according to proof against Defendant for Defendant's violations of C.R.S. § 42-4-110.5 (2)(a)(IV) and §6-1-105(rrr).
- e. Award all actual, general, special, incidental, statutory, punitive, and consequential damages and restitution to which Plaintiff and the Class Members are entitled;
- f. Award pre-judgment and post-judgment interest on such monetary relief;
- g. Permanently enjoin Defendant from enforcing or adhering to any agreement that violates C.R.S. § 42-4-110.5 (2)(a)(IV).
or from establishing any similar agreement in the future;
- h. Award reasonable attorneys' fees, expert fees, and costs; and
- i. Award exemplary damages due to Defendant's willful and wanton actions in intentionally violating C.R.S. § 42-4-110.5 (2)(a)(IV).
- j. Grant such further relief as this Court deems just and proper.



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