

Colorado Supreme Court 2 East 14th Avenue Denver, CO 80203	DATE FILED April 10, 2025 CASE NUMBER: 2025SA94
Original Proceeding in Unauthorized Practice of Law, 24UPL40 & 24UPL55	
Petitioner: The People of the State of Colorado, v. Respondents: Adriana Argoty and Asecon Advisors Consulting, LLC.	Supreme Court Case No: 2025SA94
ORDER OF INJUNCTION	

Upon consideration of the stipulation, agreement and affidavit consenting to an order of injunction filed in the above cause, and now being sufficiently advised in the premises,

IT IS ORDERED that Respondents, ADRIANA ARGOTY and ASECON ADVISORS CONSULTING, LLC, shall be, and the same hereby are, ENJOINED from engaging in the Unauthorized Practice of Law in the State of Colorado and/or engaging in activities that constitute the practice of law in Colorado, including those identified within C.R.C.P. 232.2 and in the parties' agreement.

IT IS FURTHER ORDERED that Respondent, ADRIANA ARGOTY is to pay \$224.00, made payable to the Colorado Supreme Court Office of Attorney

Regulation Counsel, for the administrative costs of these proceedings within (14) days of the issuance of the injunction.

BY THE COURT, APRIL 10, 2025.

SUPREME COURT, STATE OF COLORADO
2 E. 14TH Ave.
Denver, Colorado 80203

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April 7, 2025 4:15 PM
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CASE NUMBER: 2025SA94

ORIGINAL PROCEEDING IN UNAUTHORIZED
PRACTICE OF LAW

Petitioner:
THE PEOPLE OF THE STATE OF COLORADO

▲ COURT USE ONLY ▲

Case Number:

Respondents:
ADRIANA ARGOTY AND ASECON ADVISORS
CONSULTING, LLC.

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**STIPULATION, AGREEMENT AND AFFIDAVIT CONSENTING TO AN
ORDER OF INJUNCTION**

On this 7 day of April, 2025, Justin P. Moore, First Assistant Regulation Counsel and attorney for Petitioner, and Respondents Adriana Argoty and Asecon Advisors Consulting, LLC (hereinafter “Asecon”), through counsel Knute Broady, hereby file this Stipulation, Agreement and Affidavit Consenting to an Order of Injunction (“Stipulation”), and submit the same to the Colorado Supreme Court for a finding and order of injunction under C.R.C.P. 232.17, et. seq. and in support, state as follows:

1. Respondents are subject to the jurisdiction of this Court in these proceedings per C.R.C.P. 232.2, as they are nonlawyers who engaged in or attempted to engage in the practice of law in Colorado, as described in more detail herein.

2. Respondent Argoty resides in Colorado, and Respondent Asecon does business in Colorado.

3. Respondents understand that the Colorado Supreme Court has exclusive jurisdiction to determine what constitutes the practice of law in Colorado.

4. Respondents are familiar with the rules of the Colorado Supreme Court regarding the unauthorized practice of law. Respondents acknowledge the right to a full and complete evidentiary hearing on the charges in a petition for injunction. At any such hearing, Respondents would have the right to be

represented by counsel, present evidence, call witnesses, and cross-examine witnesses presented by Petitioner. At any such formal hearing, Petitioner would have the burden of proof and would be required to prove the charges contained in a petition for injunction by a preponderance of the evidence. Nonetheless, having full knowledge of the right to such a formal hearing, Respondents waive that right.

5. Respondents enter this stipulation freely and voluntarily. It is Respondents' decision to enter into this stipulation, and Respondents affirm that this agreement is not the product of coercion, duress or other intimidating acts by any person or agency. Respondents are fully aware of the implications of the admissions made herein.

6. Respondents understand that prohibited activities by a nonlawyer include the lay exercise of legal discretion, such as advice to clients regarding legal matters. *People v. Adams*, 243 P.3d 256, 266 (Colo. 2010). In addition, Respondents understand that preparation of legal documents for others by an unlicensed person, other than solely as a typist, is the unauthorized practice of law, unless the Colorado Supreme Court has authorized such action in a specific circumstance. *Title Guaranty Co. v. Denver Bar Ass'n*, 312 P.2d 1011, 1012 (Colo. 1957).

7. Respondents understand that under C.R.C.P. 232.2(b), "practice of law" includes the following:

- (1) Protecting, defending, or enforcing the legal rights or duties of another person;
- (2) Representing another person before any tribunal or, on behalf of another person, drafting pleadings or other papers for any proceeding before any tribunal;
- (3) Counseling, advising, or assisting another person in connection with that person's legal rights or duties;
- (4) Exercising legal judgment in preparing legal documents for another person; and
- (5) Any other activity the supreme court determines to constitute the practice of law.

8. Respondents understand that under C.R.C.P. 232.2(c), prohibited activities by a nonlawyer include:

- (1) Exercising legal judgment to advise another person about the legal effect of a proposed action or decision;
- (2) Exercising legal judgment to advise another person about legal remedies or possible courses of legal action available to that person;
- (3) Exercising legal judgment to select a legal document for another person or to prepare a legal document for another person, other than solely as a typist or scrivener;
- (4) Exercising legal judgment to represent or advocate for another person in a negotiation, settlement conference, mediation, or alternative dispute resolution proceeding;
- (5) Exercising legal judgment to represent or advocate for another person in a hearing, trial, or other legal proceeding before a tribunal;
- (6) Advertising or holding oneself out, either directly or impliedly, as an attorney, a lawyer, "Esquire," a legal consultant, or a legal advocate, or in any other manner that conveys capability or authorization to provide unsupervised services involving the exercise of legal judgment;

(7) Owning or controlling a for-profit entity that is not authorized under C.R.C.P. 265 and that provides services involving the exercise of legal judgment;

(8) Soliciting any fees for services involving the exercise of legal judgment;

(9) Owning or controlling a website, application, software, bot, or other technology that interactively offers or provides services involving the exercise of legal judgment; and

(10) Performing any other activity that constitutes the practice of law as set forth in subsection (b) above.

9. Respondents understand these prohibitions exist in Colorado and that they have engaged in activities that constitute the unauthorized practice of law. The parties stipulate to the following conclusions:

Background

10. Respondent Argoty is not licensed to practice law in the state of Colorado, or any federal or state jurisdiction in the United States.

11. Respondent Argoty is from Colombia. After her arrival in the United States in 2021, Respondent Argoty worked at Campos Law in Colorado. She left Campos Law in 2024.

Work at Asecon

12. After her departure from Campos Law, Respondent Argoty formed and owned Asecon, which is connected to Asecon – Asesores Integrales de Consulta S.A.S., a company in Colombia. Respondent Argoty was an attorney in

Colombia. Respondent Argoty is both owner and registered agent for Asecon¹ in Colorado.

13. Asecon is not a law firm and never employed any attorneys in Colorado.

14. Respondent Argoty and Asecon consulted with clients about EB-2 NIW (National Interest Waiver) visas, along with other possible courses of action and alternatives. Respondents also assisted clients in preparing EB-2 NIW visas and Respondent Argoty's role went beyond being a typist or scribe.

15. EB-2 NIW visas are particularly complicated. The USCIS website states as follows about "Employment Based Immigration; Second Preference EB-2": "[y]ou may be eligible for an employment-based, second preference visa if you are a member of the professions holding an advanced degree or its equivalent, or a person who has exceptional ability."

16. EB-2 NIW visas involve consideration of a variety of criteria. Respondent Argoty's actions, individually and through Asecon, involved discussing and consulting about criteria, including: "proof of exceptional ability" and "evidence of national importance."

¹ Asecon's Articles of Incorporation were filed with the Colorado Secretary of State on April 25, 2024.

17. Determination about whether a client meets the established criteria and qualifies for an EB-2 NIW visa, is eligible for another option, and how to pursue available options, involves legal analysis and judgment.

Phone call – June 2024

18. During a phone call in June 2024, a virtual assistant from Asecon stated that the company could help the caller with their (or their family member's) immigration needs. When the caller asked for the name of the attorney at the entity, the Asecon virtual assistant said Respondent Argoty was the attorney and they could schedule an appointment with the attorney. The virtual assistant told the caller a consultation would cost \$50.

19. As of June 2024, Asecon did not have an arrangement with an attorney who could provide legal services for Asecon's clients in immigration matters.

20. Respondents were responsible for the conduct of Asecon's virtual assistant.

Letter and Meeting with L.A.G.R.

21. In July 2024, L.A.G.R.² called a phone number for Asecon she found on Instagram and spoke with a representative from Asecon who informed her that

² The parties agree to refer to this individual by initials since she was not a complaining witness.

the call would be recorded. She was told that the lawyer, “Adriana,” would help her and they would call her back.

22. When an Asecon representative called her back, the representative asked how L.A.G.R. was referred, where she worked, and about her interest in receiving legal advice. L.A.G.R. set up a consultation with Asecon.

23. On the date of the consultation, July 27, 2024, somebody from Asecon called L.A.G.R. and monitored her to ensure she arrived at the correct location. That person did not stop talking to L.A.G.R. on her cell phone until they saw that she was in the waiting room.

24. When L.A.G.R. checked in at the reception desk, a man identified himself as a staff member. He requested \$50 for the consultation. L.A.G.R. asked if an attorney was going to assist her. The employee twice said it would be “Doctor Adriana”. The man provided her with an invoice without any letterhead.

25. L.A.G.R. waited for almost an hour with other Asecon customers in the waiting room who told her that they were there to sign a contract.

26. L.A.G.R. then met Respondent Argoty in an office. L.A.G.R. inquired about a professional visa. Respondent told her to keep her status and that she should immediately apply for an F1 visa. Respondents agree this involved providing legal advice and analysis.

27. Respondent Argoty explained a variety of other options to L.A.G.R., including about asylum, national interest visas and professional visas. Respondents agree providing and discussing these options involved providing legal judgment and analysis.

28. L.A.G.R. asked Respondent Argoty if she was a lawyer. Respondent Argoty did not clearly answer.

Rami Lee

29. Rami Lee is an attorney licensed to practice law in New Jersey, who practices immigration law. On August 1, 2024, Ms. Lee reached out to Asecon via email for the first time regarding her availability for contract legal work. Ms. Lee worked on two matters for Asecon in August/September 2024. She prepared cover letters on those two cases after reviewing the files and information Respondent Argoty provided. Respondent Argoty had already met with the clients and told them what they qualified for under immigration laws. Respondent Argoty had already provided consultation and analysis on those cases. Ms. Lee also responded to Respondent's questions about 6-7 other client matters.

30. Ms. Lee did not have a standing arrangement to take cases for Asecon, or Respondent Argoty. At the request of Respondents, Ms. Lee consulted about a national interest waiver for someone not in the United States, but she did not take that case.

31. Ms. Lee did not realize Respondent Argoty was not an attorney at the time she provided these services, as Respondent Argoty never clarified this fact and Respondent Argoty communicated with Ms. Lee in a manner that reflected Respondent Argoty was knowledgeable about immigration matters via Respondent Argoty's email address - legal@asecon.com. Respondent Argoty only clarified with Ms. Lee that she was not an attorney after Regulation Counsel's investigation commenced.

Advertising/Communication about services

32. Facebook messages, screenshots of communications about services, and video advertisements, including about the immigration process, further created the impression Asecon was able to provide legal services. The following is an example of the company's marketing about its services (as of July 2024)³, which Respondent Argoty was responsible for:

Get your permanent residency to stay in the United status permanently. There's one for you.

Work permit
Political asylum
Family petition
TPS
Visa – human trafficking victim
Visa – juvenile under 21 years of age

³ Translated to English from the original Spanish language marketing material.

Visa – VAWA abuse
Visa – victim of a crime
Visa- tourist
Visa- student
Send us a direct message or contact us

33. Respondent Argoty was responsible for the “Who we are” section of the company website (as of July 2024), in which the company advertised:

We are a company dedicated to offering immigration advice and services for the United States. We help you manage your work permit, Social Security, process your Asylum, TPS, or the Petition you require to organize your immigration status.

Our team is comprised of highly trained professionals committed to providing effective and customized solutions to individuals and businesses seeking to navigate the complex US immigration system.

34. Asecon advertised that it was able to provide immigration services, aimed primarily at Colombians who wanted to process their EG-2 NIW visas from Colombia. As owner of Asecon, Respondent Argoty was responsible for the communications on the website and statements such as:

- Get your permanent residency to stay in the United States permanently. There’s one for you.
- The company offers the following services: Work permit Political asylum Family petition TPS Visa – human trafficking victim Visa – juvenile under 21 years of age Visa – VAWA abuse Visa – victim of a crime Visa- tourist Visa- student Send us a direct message or contact us.
- We are a company dedicated to offering immigration advice and services for the United States. We help you manage your work permit, Social Security, process your asylum, TPS, or

the Petition you require to organize your immigration status...Our team is comprised of highly trained professionals committed to providing effective and customized solutions to individuals and business seeking to navigate the complex US immigration system.

35. Respondent Argoty was responsible for the “What we do” section of Asecon’s website, which stated as follows:

- Visa and permit advice. We offer expert guidance on obtaining different types of visas, work permits, study permits, and residence permits in the United States.
- Legal Representation. We provide alliances with different law firms for legal representation to immigration cases, including appeals and defense in deportation proceedings.
- Procedures and Documentation. We assist in the preparation and presentation of all necessary documentation for immigration applications, ensuring that all requirements are properly met.

36. Finally, Respondent Argoty was responsible for the statement on Asecon’s website, “[w]e advise on immigration matters.”

37. The website “aseconadvisors.com” is now under maintenance. The prompt on the site says, “Site will be available soon. Thank you for your patience!”

Email address

38. Respondent hereby represents that she has stopped using the email address, legal@asecon.com.

39. Through the aforementioned conduct, Respondents engaged in the unauthorized practice of law.

AGREEMENT TO INJUNCTION AND OTHER RELIEF

40. As part of this agreement, the People and Respondents agree to the following: 1) Respondent Argoty and Asecon are enjoined from any future unauthorized practice of law and/or engaging in activities that constitute the practice of law in Colorado, including those identified within C.R.C.P. 232.2 and in this agreement; and 2) Respondent Argoty will pay the administrative costs of these proceedings in the amount of \$224.00, made payable to the Colorado Supreme Court Office of Attorney Regulation Counsel. ***See Ex. 1, Statement of Costs.***

41. This Stipulation is premised and conditioned upon acceptance of the same by the Court. If for any reason the Stipulation is not accepted without changes or modification, then the admissions, confessions, and stipulations made by Respondent will be of no effect. Either party will have the opportunity to accept or reject any modification. If either party rejects the modification, then the parties shall be entitled to a full evidentiary hearing; and no confession, stipulation, or statement made by Respondents in conjunction with this offer may be subsequently used.

42. By stipulating to this injunction, Respondents are exempt from a fine pursuant to C.R.C.P. 232.17(c).

43. The People and Respondents agree that no restitution is payable under this stipulation.

**RECOMMENDATION FOR AND CONSENT TO INJUNCTION AND
ORDER FOR COSTS**

Based on the foregoing, the parties hereto ask this Court to enjoin Respondent Argoty and Asecon from further unauthorized practice of law, and to order Respondent Argoty to pay the costs of the proceedings within 14 days of the issuance of the injunction.

Respondents Adriana Argoty and Asecon Advisors Consulting, LLC, represented by Knute Broady in this matter, and Justin P. Moore, attorney for Petitioner, acknowledge that by signing this document, they have read and reviewed the above and request the Colorado Supreme Court accept the terms of the Stipulation as set forth above.

Respectfully submitted, this 7 day of April, 2025.

Adriana Argoty Botero

Adriana Argoty, individually and as
Owner or Managing Member and
Authorized Representative of Asecon
Advisors Consulting, LLC.

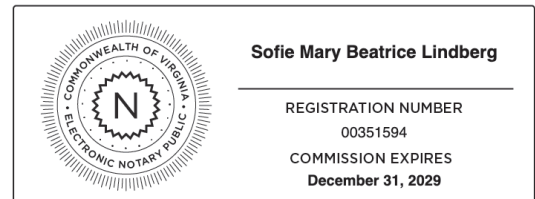
Respondents

STATE OF COLORADO)
Virginia)ss:
COUNTY OF DENVER)
Arlington

Subscribed and sworn to before me this 7 day of April, 2025, by
Adriana Argoty Botero.

Witness my hand and official seal.

My commission expires: 12/31/2029
Sofie Mary Beatrice Lindberg



Notarized remotely online using communication technology via Proof.

Sofie Mary Beatrice Lindberg

Notary Public

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Statement of Costs

**Adriana Argoty
24UPL40**

3/21/2025	Administrative Fee	\$	<u>224.00</u>
	AMOUNT DUE	\$	224.00

Exhibit 1