AFSA
AMERICAN FINANCIAL SERVICES ASSOCIATION

Colorado AI/ADMT Law Timeline

Colorado AI/ADMT: A Chronology of Relevant Dates

April 10, 2024 Colorado State Senate Majority Leader Robert Rodriguez (D-Denver) introduces a bill entitled Consumer Protections for Artificial Intelligence (SB 24-205).

May 17, 2024 Governor Jared Polis signs SB 24-205 with reservations. Governor Polis articulates the expectation that it will be further revised before it's scheduled to go into effect on February 1, 2026. In an accompanying letter, he expresses concern about the law's potential impact on innovation.

April 28, 2025 Two of the original sponsors of SB 24-205 introduce an amendment in the form of SB 25-318, entitled "Artificial Intelligence Consumer Protections."

May 5, 2025 SB 25-318 fails when the Senate Committee on Business, Labor & Technology votes 5–2 to postpone it indefinitely. On the same day, Governor Polis—along with Attorney General Phil Weiser and others—send a letter requesting that the law's effective date be delayed until January 2027.

August 6, 2025 Governor Polis signs Executive Order D 2025 009, calling an extraordinary (special) legislative session to among other issues, consider the fiscal and implementation impacts of the CAIA.

August 25, 2025 During a special session, lawmakers abandon an effort to substantively rewrite the AI law (SB 25B-004) after five days of negotiations between stakeholders yield no results. Senator Rodriguez amends SB 25B-004 to push back the start date.

August 28, 2025 Governor Polis signs SB 25B-004 into law, extending the effective date to June 30, 2026.

October 13, 2025 Governor Polis appoints an 18-member task force to draft recommendations to revise the law. Its meetings are not fully open to the public.

March 17, 2026 The Colorado AI Policy Work Group, with Governor Polis's backing, release a proposed framework act to replace much of the original AI law. Provisions include primarily notice and disclosure, preventing new private rights of action but preserving existing rights under Colorado law, and holding developers responsible (under existing general anti-discrimination law) for discrimination resulting from automated decision-making technology. The framework act has an effective date of January 1, 2027.

April 9, 2026 *Court Filing:* X.AI LLC ("xAI") files a complaint for declaratory and injunctive relief in the U.S. District Court for the District of Colorado against Colorado Attorney General Philip J. Weiser, seeking to enjoin enforcement of SB 24-205 before its June 30, 2026 effective date.

April 24, 2026 *Court Filing*: The Department of Justice intervenes in the xAI lawsuit, filing its own complaint alleging that SB 24-205 violates the Equal Protection Clause of the Fourteenth Amendment.

April 27, 2026 *Court Order:* Judge Cyrus Y. Chung of the U.S. District Court for the District of Colorado grants both parties' joint motion and issues a temporary stay, ordering Colorado's AI law not be enforced until 14 days after the Court rules on xAI's forthcoming motion for a preliminary injunction. Under the agreement, xAI agrees to file its motion for a preliminary injunction within 28 days after the state finalizes rulemaking for SB 24-205 or any new legislation that amends or replaces it.

May 1, 2026 A new Colorado AI bill (SB 26-189) is introduced, closely resembling the draft measure released by the Colorado AI Policy Work Group. It would largely repeal the legal framework of SB 24-205 and replace it with narrower "notice" provisions focused on automated decision-making technology.

May 5, 2026 SB 189's is heard before the Senate Business, Labor, and Technology Committee and passed by a vote of 5-0.

May 8 & 9, 2026 SB 189 is amended.

May 12, 2026 SB 189 passes both houses.

May 14, 2026 Signed by Governor Polis.

June 23, 2026 Colorado Attorney General opens pre-rulemaking public comment period.

July 13, 2026 AFSA submits pre-rulemaking comment letter to AG's office.

Pre-rulemaking comment period ends.

August 11, 2026 AG releases proposed rules, along with a timeline of their planned rulemaking phase on their website, under the page "Colorado Automated Decision-Making Technology & Chatbot Safety Rulemaking**".**

> Please submit written comments by September 4, 2026 to be considered in a revised proposed rulemaking draft that will be circulated no later than September 23, 2026. In drafting the final set of rules, the Office will consider all written comments received on or before October 26, 2026 at 11:59 P.M. MST, or if the formal rulemaking hearing continues beyond October 26, 2026, before 11:50 P.M. MST on the last day of the formal rulemaking hearing.

September 4, 2026 AFSA submits proposed rulemaking comment letter to AG's office.

Comment period ends for comments "t*o be considered in a revised proposed rulemaking draft that will be circulated no later than September 23, 2026*".

September 23, 2026 Release deadline of the revised proposed rule per the AG's timeline.

Late that night or early morning September 24, AG's website removes reference to releasing a revised proposed rule September 23, with "*to be considered in a revised proposed rulemaking draft that will be circulated according to the Colorado Administrative Procedure Act and at least five days prior to the public hearing.*" No notice was given either directly or indirectly (website or through the "mailing list") of the changes to the timeline announced in August.

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October 10, 2026 AG's Office releases an interim draft of the revised rules.

October 26, 2026 Public hearing (in-person & virtual). AFSA testified remotely focusing on conflict of law provisions. AFSA also submits a written comment letter on interim draft.

November 2, 2026 AFSA requests an in-person meeting with staff at the AG's Office.

January 1, 2027 Effective date.