

DISTRICT COURT, TELLER COUNTY, COLORADO 101 W. Bennett Avenue, Cripple Creek, CO 80813	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
Plaintiffs: BERCK NASH; JOANNA NASH; RODNEY SAUNDERS; PAUL MICHAEL STEWART; and JANET GOULD, v. Defendant: JASON MIKESELL, in his official capacity as Sheriff of Teller County, Colorado.	
Attorneys for Plaintiffs: Names: Stephen G. Masciocchi, #19863 Hannah E. Armentrout, #53990 Address: HOLLAND & HART LLP 555 17th Street, Suite 3200 Denver, Colorado 80202 Phone/Fax: 303-295-8000/303-295-8261 E-mail: smasciocchi@hollandhart.com hearmentrout@hollandhart.com Names: Byeongsook Seo, #30914 Stephanie A. Kanan, #42437 Address: SNELL & WILMER LLP 1200 17th Street, Suite 1900 Denver, Colorado 80202 Phone/Fax: 303-634-2000/303-634-2020 E-mail: bseo@swlaw.com skanan@swlaw.com	 Case No.: 2019CV30051 Division: 11

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JOINT STIPULATION		

Plaintiffs Berck Nash, Joanna Nash, Rodney Saunders, Paul Michael Stewart, and Janet Gould (“Plaintiffs”) and Defendant Jason Mikesell, in his official capacity as Sheriff of Teller County, Colorado (“Sheriff Mikesell”) (collectively, the “Parties”) submit this Joint Stipulation to address the remaining issues before the Court on remand from the Colorado Court of Appeals.

INTRODUCTION

This case is before the Teller County District Court on remand from the Colorado Court of Appeals “to make detailed findings and conclusions regarding whether plaintiffs have met their burden for a permanent injunction.” *Nash v. Mikesell*, 2024 COA 68, ¶ 58. The Parties have reached this Joint Stipulation to address the remaining issues before the Court on remand and to

respectfully request that the Court enter this Joint Stipulation as an Order of the Court and enter a final judgment in this case.

PROCEDURAL HISTORY

A “287(g) agreement” is a written agreement between ICE and a state, or any political subdivision of a state, under which ICE trains and certifies local law enforcement officers, called Designated Immigration Officers (“DIOs”) to perform certain immigration enforcement functions under the supervision of an ICE officer. The Sheriff has been a party to a 287(g) agreement with the U.S. Immigration and Customs Enforcement (“ICE”) since 2019.

The case concerns TCSO’s 287(g) Agreement. The Agreement purported to vest Teller County Sheriff’s deputies trained as DIOs with, among other things, the power to arrest and detain aliens and to transport detained aliens. In practice, the DIOs exercised their duties under the 287(g) Agreement several times, including by arresting three people housed at the Teller County Jail and detaining them after they were eligible for release from state custody (“release-eligible”). *Nash v. Mikesell*, 2024 COA 68, ¶ 8.

In 2019, the Colorado General Assembly enacted HB 19-1124, 2019 Colo. Sess. Laws 2759-62, which mandates that law enforcement officers “shall not arrest or detain an individual on the basis of a civil immigration detainer request.” C.R.S. § 24-76.6-102(2). The statute defines “civil immigration detainer” to include ICE administrative warrants and detainers. *Id.* § 24-76.6-101(1). As the statute explains, federal immigration forms used in connection with such arrests and detentions are not warrants under Colorado law and are not “reviewed, approved, or signed by a judge.” *Id.* § 24-76.6-102(1)(b). Thus, “continued detention of an

inmate at the request of federal immigration authorities beyond when he or she would otherwise be released” constitutes an unconstitutional warrantless arrest. *Id.*; *see Nash*, ¶ 26.

Plaintiffs sued Sheriff Mikesell in his official capacity in June 2019, after C.R.S. §§ 24-76.6-101 and -102 became law. *See CF*, pp 4-16. They sought declaratory and injunctive relief, alleging that arrests and detentions carried out under TCSO’s 287(g) agreement with ICE are prohibited by this statute and the Colorado Constitution. *CF*, pp 11, 15-16. After a three-day bench trial, the Parties submitted proposed findings of fact and conclusions of law with competing requests for declaratory relief. This Court rejected Plaintiffs’ proposed declarations and adopted Sheriff Mikesell’s, holding the challenged practices were lawful. *CF*, p 1356.

On July 3, 2024, the Colorado Court of Appeals reversed the judgment but declined to adopt the Plaintiffs’ proposed declarations. *Nash*, ¶¶ 51, 59. It held that “(1) sections 24-76.6-101 and -102 are not preempted [by federal law]; (2) per the plain language of 8 U.S.C. § 1357(g), a 287(g) agreement must comply with Colorado statutory law; (3) sections 24-76.6-101 and -102 prohibit TCSO from arresting individuals on the basis of civil immigration detainers as that term is defined in section 24-76.6-101; and (4) therefore any portions of TCSO’s Agreement purporting to authorize TCSO deputies to arrest or detain individuals on the basis of civil immigration detainers are invalid.” *Id.* ¶ 51.

The Court of Appeals also held that Plaintiffs had demonstrated actual success on the merits for purposes of their request for a permanent injunction, *id.* ¶ 56, and it remanded the case “for the district court to make detailed findings and conclusions regarding whether [P]laintiffs have met their burden for a permanent injunction,” *id.* ¶ 58.

CASE STATUS ON REMAND

The original 287(g) Agreement was accompanied by documents that more specifically define the relationship between TCSO and ICE. The original Designated Immigration Officer authorization form, ICE Form 70-0006 (“DIO Form”), specifies the duties that ICE authorizes DIOs to perform. *See* DIO Form (9/7/20), attached as **Exhibit 1**. “Only the duties marked are authorized to be performed” by the DIO. *Id.* In addition, DIOs’ and TCSO’s powers, authority, and duties are set forth in the Standard Operating Procedures (“SOPs”) attached to the 287(g) Agreement as Appendix A. *See* SOPs (3/11/20), attached as **Exhibit 2**.

In the DIO Form and SOPs at issue at trial and on appeal, ICE authorized TCSO and DIOs to exercise certain powers and authorities including the power and authority to “serve warrants of arrest for immigration violations” and “detain and transport arrested aliens to ICE-approved detention facilities.” The SOPs also state that TCSO will detain release-eligible persons for up to 48 hours based on ICE forms. The Court of Appeals ruled that these delegations and detentions are unlawful under sections 24-76.6-101 and -102.

After consultations between the Parties, TCSO and ICE have revised the DIO form to comply with the Court of Appeals’ opinion. *See* **Exhibit 3**. The Parties have agreed that DIOs do not possess the powers or authorities that are highlighted in the SOPs (**Exhibit 2**) and removed from the revised DIO form (**Exhibit 3**). The Parties have also agreed on revisions to TCSO’s Custody Manual and Booking Post Orders. *See* **Exhibit 4**.

STIPULATIONS

1. Plaintiffs and Sheriff Mikesell enter into the following Stipulations. These Stipulations are intended to resolve the outstanding issues remaining following remand from the Colorado Court of Appeals.

A. Designated Immigration Officer Authorization Form

2. The DIO Form has been revised to comply with the Court of Appeals' decision by unchecking boxes that had previously granted DIOs certain power and authority.

3. The current, operative DIO Form, attached as **Exhibit 3**, now reflects that DIOs do **not** have the following power or authority:

- "The power and authority to serve warrants of arrest for immigration violations." Ex. 3, at 1.
- "The power and authority to detain and transport arrested aliens to ICE-approved detention facilities." Ex. 3, at 1.

4. Sheriff Mikesell acknowledges and agrees that TCSO does **not** have the authority to arrest or detain individuals based on any ICE form.

5. The "Other duties" portion of the DIO Form refers to Appendix A, the SOPs. Ex. 3, at 1. To comply with the Court of Appeals' decision, this portion of the DIO Form specifically states: "Except the power and authority to serve and execute warrants of arrest and the power and authority to serve warrants of removal."

B. Standard Operating Procedures

6. Consistent with the Court of Appeals' decision and the revised DIO Form, TCSO and the DIOs agree they do **not** have the following power or authority listed in the highlighted paragraphs of the SOPs, attached as **Exhibit 2**:

- The power and authority of DIOs to serve and execute warrants of arrest for immigration violations, and the related duty and authority of TCSO to continue to hold aliens in TCSO's jail for up to 48 hours. Ex. 2, at 1.
- The power and authority of DIOs to serve warrants of removal, and the related duty and authority of TCSO to continue to hold aliens in TCSO's jail for up to 48 hours. Ex. 2, at 1.
- The power and authority of DIOs to detain and transport arrested aliens. Ex. 2, at 2.

C. Custody Manual and Booking Post Orders

7. Finally, the Parties have stipulated to amend TCSO's Custody Manual and Booking Post Orders to comply with the Court of Appeals' decision by clarifying that when persons held at the Teller County Jail are release-eligible under Colorado law, the Jail shall not deny or delay their release based solely on an ICE form or combination of forms. *See Exhibit 4.*

8. The foregoing stipulations resolve the remaining disputes between the Parties.
9. Plaintiffs therefore withdraw their request for a permanent injunction.
10. Each party shall bear their own fees and costs.

CONCLUSION

The Parties respectfully request that the Court enter the foregoing Stipulation as an Order of the Court and enter a final judgment in this case.

Dated January 28, 2025.

Respectfully submitted,

s/ Stephen G. Masciocchi

Stephen G. Masciocchi, #19873
Hannah E. Armentrout, #53990
HOLLAND & HART LLP

s/ Byeongsook Seo

Byeongsook Seo, #30914
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*In cooperation with the American Civil
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Attorneys for Plaintiffs

s/ Paul W. Hurcomb

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Teller County Attorney
Sparks Willson, P.C.

Attorney for Defendant Jason Mikesell in his
official capacity as Sheriff of Teller County

CERTIFICATE OF SERVICE

I certify that on January 28, 2025, I served a copy of the foregoing document to the following by

- ☐ U.S. Mail, postage prepaid
- ☐ Hand Delivery
- ☐ Fax
- ☒ Electronic Service by Colorado Courts E-Filing System

Paul W. Hurcomb, Teller County Attorney
Sparks Willson, P.C.
24 South Weber Street, Suite 400
Colorado Springs, CO 80903

s/ Brenda S. Proskey
Holland & Hart LLP

34093312_v1

EXHIBIT 1

CANCELLED/REVOKED

Authorizing Officer's Signature _____ Date _____

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

Credential Number:

G08345

DESIGNATED IMMIGRATION OFFICER

Section 287(g) of the Immigration and Nationality Act (INA), codified at 8 U.S.C. Section 1357(g), authorizes the Secretary of Homeland Security, acting through the Assistant Secretary of U.S. Immigration and Customs Enforcement (ICE), to enter into written agreements with a State or any political subdivision of a State so that qualified personnel can perform certain law enforcement functions of an Immigration Officer. This designation, for the performance of such duties as outlined below, will be in effect while you remain in your present position and location unless revoked at an earlier date. In performing the duties of a Designated Immigration Officer, you will be subject to all guidelines, directives and instructions of ICE. Arrangements will be made for you to receive the training necessary to perform your duties as a Designated Immigration Officer.

1. Officer's Name Angela Bueno	2. Other Names Used N/A	3. Date of Birth 04/23/1983
4. Agency Teller County Sheriff's Office	5. Agency Position/Rank Detention Deputy	6. Badge Number 178
Address 288 Weaverville Road Street Divide CO 80814 City State Zip Phone 7196877770 Ext. _____ Alt. Phone _____ Ext. _____		7. Officer's Assigned Firearm Make N/A Model _____ Caliber _____ Serial No. _____
8. ICE Office Assigned ERO Denver, Colorado		9. Date Issued

10. Duties when authorized by the ICE authorizing official: (Only the duties marked are authorized to be performed by the Designated Immigration Officer.)
- ☐ Use of firearms and other ICE approved weapons in accordance with the ICE Directive relating to Use of Force. Carriage of firearms will be in accordance with the officer's employing agency.
- ☒ The power and authority to interrogate any person believed to be an alien as to his right to be or remain in the United States (INA § 287(a)(1) and 8 C.F.R. § 287.5(a)(1)) ~~and to arrest any removable alien identified pursuant to a lawful stop.~~
- ☐ Arrest without warrant for felonies which have been committed and which are cognizable under any law of the United States regulating the admission, exclusion, expulsion, or removal of aliens, if he has reason to believe that the person so arrested is guilty of such felony and if there is likelihood of the person escaping before a warrant can be obtained for his arrest. (INA § 287(a)(4) and 8 C.F.R. § 287.5(c)(2)). Arrested individuals must be presented to a federal magistrate judge or other authorized official without unnecessary delay. (INA § 287(a)(4); Fed. R. Crim. P. 5). Notification of such arrest must be made to ICE within twenty-four (24) hours.
- ☐ The power and authority to serve warrants of arrest for immigration violations pursuant to 8 C.F.R. § 287.5(e)(3).
- ☒ The power and authority to administer oaths and to take and consider evidence (INA § 287(b) and 8 C.F.R. § 287.5(a)(2)), to complete required criminal alien processing, including fingerprinting, photographing, and interviewing of aliens, as well as the preparation of affidavits and the taking of sworn statements for ICE supervisory review.
- ☒ The power and authority to prepare charging documents (INA Section 239, 8 C.F.R. 239.1; INA Section 238, 8 C.F.R. 238.1; INA Section 241(a)(5), 8 C.F.R. 241.8; INA Section 235(b)(1), 8 C.F.R. 235.3) including the preparation of a Notice to Appear application or other charging document, as appropriate, for the signature of an ICE officer for aliens in categories established by ICE supervisors.
- ☒ The power and authority to issue immigration detainers (8 C.F.R. § 287.7) and I-213, Record of Deportable/Inadmissible Alien, for processing aliens in categories established by ICE supervisors.
- ☒ The power and authority to detain and transport arrested aliens to ICE-approved detention facilities (8 C.F.R. § 287.5(c) (6)).
- ☒ Other duties: See Appendix A of the 287(g) Jail Enforcement Model Memorandum of Agreement - EXCEPT the power and authority to serve and execute warrants of arrest and the power and authority to serve warrants of removal

I have read and understand the above.

07/11/2024

Designated Immigration Officer's Signature

Date

11. Requesting Office: ☐ DI ☒ DRO

12. Authorizing Officer

Field Office Director

NICHOLE C BLACK

Digitally signed by NICHOLE C BLACK
Date: 2024.07.12 14:24:28 -06'00'

Printed Name

Title

Signature

ICE Form 70-006 (01/09)

Privacy Statement

Authority and Purpose: Section 287(g) of the Immigration and Nationality Act (INA) authorizes state and local law enforcement officers to perform immigration law enforcement functions pursuant to agreements between ICE and the employing state and local law enforcement agency. Personal information is collected to maintain accurate records about which law enforcement officers have been designated, the scope of their authorized duties, and to administer training and other oversight or program management activities.

Disclosure: Furnishing this information is voluntary; however, failure to provide it will result in denial to participate in the 287(g) program and the non-issuance of the Immigration Officer credentials.

Routine Uses: This information will be used by DHS personnel and contractors or other agents for administrative purposes related to implementation of the 287(g) program. Additionally, this information will be disclosed to the employing state or local law enforcement agency in the course of administering and overseeing the designated officers. The information may also be disclosed to the U.S. Department of Justice or to parties and tribunals during litigation or other proceedings related to the exercise of the Section 287(g) authority or the administration of the 287(g) program.

EXHIBIT 2

APPENDIX

STANDARD OPERATING

The purpose of this appendix is to establish standards and oversight of this MOA within the FOD area of

Pursuant to this MOA, the LEA has been delegated the (JEM) Program as outlined below. The 287(g) JEM removable aliens within the LEA's jail/correctional

Authorized Functions:

Participating LEA personnel performing immigration duties as the LEA officers assigned to detention duties. Those personnel exercise their immigration-related authorities only during their assignment to the LEA's jail/correctional facilities.

Participating LEA personnel are delegated only those

- The power and authority to interrogate and process detainees in an enforcement agency's detention center who have the right to be or remain in the United States under 8 U.S.C. § 287.5(a)(1), and to process for immigration removal those who have been arrested for violating a Federal
- The power and authority to serve and execute writs of habeas corpus under 8 U.S.C. § 1357(a) and 8 C.F.R. § 287.5(e)(3) in the facilities at the time of the alien's scheduled transfer custody of the alien to ICE.

- The power and authority to prepare charging documents, 8 C.F.R. §§ 1229, and 1231(a)(5); 8 C.F.R. §§ 235.3, 238.1, and 238.2, and to issue a Notice to Appear or other charging document to an ICE officer;
- The power and authority to detain and transport arrested aliens subject to removal to the United States; 8 C.F.R. § 287.5(c)(6);
- The power and authority to issue immigration detainer notices; 8 C.F.R. § 287.7, and I-213, Record of Detention, for aliens.

Additional Supervisory and Administrative Responsibilities

Participating LEA personnel are only authorized to conduct activities while under the direction and supervision of ICE.

Additional supervisory and administrative responsibilities are limited to:

- Participating LEA personnel must notify ICE of the authority conferred by the MOA as soon as possible, but no later than 24 hours.
- Participating LEA personnel are responsible for ensuring that all activities are completed.
- Participating LEA personnel must report all encounters with aliens of U.S. citizenship to ICE immediately, but generally not later than 24 hours.

EXHIBIT 3

CANCELLED/REVOKED

Authorizing Officer's Signature _____ Date _____

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement**DESIGNATED IMMIGRATION OFFICER**

Credential Number: _____

G08345

Section 287(g) of the Immigration and Nationality Act (INA), codified at 8 U.S.C. Section 1357(g), authorizes the Secretary of Homeland Security, acting through the Assistant Secretary of U.S. Immigration and Customs Enforcement (ICE), to enter into written agreements with a State or any political subdivision of a State so that qualified personnel can perform certain law enforcement functions of an Immigration Officer. This designation, for the performance of such duties as outlined below, will be in effect while you remain in your present position and location unless revoked at an earlier date. In performing the duties of a Designated Immigration Officer, you will be subject to all guidelines, directives and instructions of ICE. Arrangements will be made for you to receive the training necessary to perform your duties as a Designated Immigration Officer.

1. Officer's Name Angela Bueno	2. Other Names Used N/A	3. Date of Birth 04/23/1983
4. Agency Teller County Sheriff's Office	5. Agency Position/Rank Detention Deputy	6. Badge Number 178
7. Officer's Assigned Firearm Make N/A Model _____ Caliber _____ Serial No. _____		
Address 288 Weaverville Road Street Divide _____ CO 80814 City _____ State _____ Zip _____ Phone 7196877770 Ext. _____ Alt. Phone _____ Ext. _____		

8. ICE Office Assigned ERO Denver, Colorado	9. Date Issued
--	----------------

10. Duties when authorized by the ICE authorizing official: (Only the duties marked are authorized to be performed by the Designated Immigration Officer.)

- ☐ Use of firearms and other ICE approved weapons in accordance with the ICE Directive relating to Use of Force. Carriage of firearms will be in accordance with the officer's employing agency.
- ☒ The power and authority to interrogate any person believed to be an alien as to his right to be or remain in the United States (INA § 287(a)(1) and 8 C.F.R. § 287.5(a)(1)) ~~and to arrest any removable alien identified pursuant to a lawful stop.~~
- ☐ Arrest without warrant for felonies which have been committed and which are cognizable under any law of the United States regulating the admission, exclusion, expulsion, or removal of aliens, if he has reason to believe that the person so arrested is guilty of such felony and if there is likelihood of the person escaping before a warrant can be obtained for his arrest. (INA § 287(a)(4) and 8 C.F.R. § 287.5(c)(2)). Arrested individuals must be presented to a federal magistrate judge or other authorized official without unnecessary delay. (INA § 287(a)(4); Fed. R. Crim. P. 5). Notification of such arrest must be made to ICE within twenty-four (24) hours.
- ☐ The power and authority to serve warrants of arrest for immigration violations pursuant to 8 C.F.R. § 287.5(e)(3).
- ☒ The power and authority to administer oaths and to take and consider evidence (INA § 287(b) and 8 C.F.R. § 287.5(a)(2)), to complete required criminal alien processing, including fingerprinting, photographing, and interviewing of aliens, as well as the preparation of affidavits and the taking of sworn statements for ICE supervisory review.
- ☒ The power and authority to prepare charging documents (INA Section 239, 8 C.F.R. 239.1; INA Section 238, 8 C.F.R. 238.1; INA Section 241(a)(5), 8 C.F.R. 241.8; INA Section 235(b)(1), 8 C.F.R. 235.3) including the preparation of a Notice to Appear application or other charging document, as appropriate, for the signature of an ICE officer for aliens in categories established by ICE supervisors.
- ☒ The power and authority to issue immigration detainers (8 C.F.R. § 287.7) and I-213, Record of Deportable/Inadmissible Alien, for processing aliens in categories established by ICE supervisors.
- ☐ The power and authority to detain and transport arrested aliens to ICE-approved detention facilities (8 C.F.R. § 287.5(c) (6)).
- ☒ Other duties: See Appendix A of the 287(g) Jail Enforcement Model Memorandum

of Agreement - EXCEPT the power and authority to serve and execute warrants of arrest and the power and authority to serve warrants of removal

I have read and understand the above.

Designated Immigration Officer's Signature _____

01/28/2025

Date

11. Requesting Office: ☐ OI ☒ DRO

12. Authorizing Officer

Field Office Director

Printed Name

Title

Signature _____

ICE Form 70-006 (01/09)

EXHIBIT 4

502.3.1 287(g) PROGRAM; IMMIGRATION DETAINERS

U.S. Immigration and Customs Enforcement (ICE) 287(g) Program enhances the safety and security of communities by creating partnerships with state and local law enforcement agencies to identify and remove persons who are removable and deportable from the United States. Section 287(g) of the U.S. Immigration and Nationality Act authorizes Department of Homeland Security (DHS) to deputize selected state and local law enforcement officers to enforce federal immigration law to the extent consistent with state law. 287(g) Officers have the authority to: interview persons believed to be in the United States illegally, administer oaths, prepare charging documents, conduct immigration status checks, and issue immigration detainers for recordkeeping purposes.

It is the policy of the Teller County Sheriff's Office to notify a 287(g) Officer if a Deputy has probable cause to believe that an arrestee is not legally present in the United States. The 287(g) Officer investigates immigration status and prepares and serves necessary administrative immigration charging documents.

When a person becomes eligible for release under Colorado law (for example, when they post bond or when their sentence has concluded), the Teller County Jail will not detain the person based solely on an ICE form or combination of forms. Thus, the presence in the person's file of ICE forms such as Warrant for Arrest of Alien (I-200), Order to Detain (I-203), or Immigration Detainer (I-247A) is not sufficient to deny or delay the release of a release-eligible person. If a person's file contains an Immigration Detainer naming the person, notification to the federal authority issuing the detainer should be made before the release, but such notification may not delay the normal release process when the person becomes release-eligible.

300.11 ICE

- IF NEW ARREST DOES NOT HAVE SOCIAL, HAS MULT ALIASES AND/OR FOREIGN BORN, CONTACT THE 287(g) OFFICER OR ICE (SEE ICE FOLDER FOR CONTACT INFO)
- ICE FORMS DO NOT PROVIDE A BASIS TO DETAIN ANY INDIVIDUAL BEYOND WHEN THEY ARE OTHERWISE ELIGIBLE FOR RELEASE.
- INDIVIDUALS WITH ICE FORMS IN THEIR FILES GO THROUGH THE NORMAL PROCESS FOR RELEASE AS SOON AS THEY ARE RELEASE-ELIGIBLE.
- SEND ICE KITES/INQUIRES TO ICE CONTACT VIA ICE FOLDER