

Prosecution Anatomy 101: presentation of a code enforcement case.

CML Municipal Prosecutor Workshop
December 7, 2023

Erich Schwiesow
Alamosa City Attorney/Municipal Prosecutor



CODE ENFORCEMENT IN COLORADO



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COLORADO
MUNICIPAL
LEAGUE

Our Friend LOVID

- **L** Location
- **O** Offense
- **V** Venue
- **I** ID
- **D** Date/Time



When to reference LOVID

Pre-filing incident review

Case Prep

During trial

Closing argument - at least any disputed elements

(i.e. throughout)

My judge has it on a notesheet in every case file
(he showed me when I almost missed one)



A Simple Nuisance

Case No: 23-1491

ALAMOSA POLICE DEPARTMENT
Media Report



People's Exhibit #2a
Case # 23-0552

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The Report

(Cops Know LOVID)

Incident # 23-1481 DE PEDRO PABLO, P On July 15, 2023, I Officer P. De Pedro Pablo (CSO) followed up on a notice of violation that was given to Donnie Turner (DOB: [REDACTED]) at his residence 309 9th Street. This location is within the City and County of Alamosa and the State of Colorado. Upon arrival, I contacted Donnie and asked why he had not cut his weeds and pickled up the trash from the property. On July 8, 2023, I gave Donnie a NOV and asked him to cut his weed around the property (photos were taken on the day of the NOV served.) As I went to follow up the NOV there was nothing cleaned up around the property. I took a recent photo of the property. Donnie Turner was charged for Failure to abate (14- 56)(E016604) due not being in complaints of cleaning his property and cutting the weeds. Above is only a summary. Nothing further from this officer.



Location

“ . . . at his residence 309 9th Street. This location is within the City and County of Alamosa and the State of Colorado.”



Proof?

Officer de Pedro Pablo
subpoena him - goes without
saying, right?



O ffense

“ . . . Donnie Turner was charged for Failure to abate (14-56)(E016604) due not being in complaints of cleaning his property and cutting the weeds.”



Elements Satisfied?

Sec. 14-56. - Abatement.

It is hereby declared unlawful to fail to abate a nuisance declared pursuant to this article. Such failure shall be subject to the procedure and charges set forth in sections 14-52, 14-53, and 14-54, and shall be subject to the penalties provided generally for offenses in this Code.



So what's a nuisance?

(Sec. 14-51)

Except in areas of the city zoned Agricultural, where this definition shall not be applicable, any non-ornamental vegetation that has bloomed or reached a height of eight (8) inches shall be considered noxious for the purposes of this article whether or not it appears on the noxious weed list referenced above. No thistle or knapweed species contained on noxious weed list A, B, or C may be considered ornamental vegetation.



Case No: 23-1481

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Also Sec. 14-51

It is made the duty of every owner, every tenant and every person in possession of any real property in the city to provide for and cause the removal of weeds, noxious vegetation, trash, and rubbish of all kinds from such property and along any street and sidewalk adjoining the same and to the middle of each public street, alley, or other public right-of-way.



Proof?

Officer de Pedro Pablo

Can he prove that Turner is an owner, tenant, or person in possession?

NOV

Photos (there are many)



NOV

7/15/23, 12:30 PM iworq.net/iworq/0_Pages/popupEditLetterPrint.php?sid=0S9PF0HDTNBY5JWW2VS727JK89400&id=4560732&letterlinkid=1810...

Alamosa Police Department
Notice of Violation

Case Number: 1205	Site Address: 309 NINTH ST	Site City, State, Zip:
Owner/Occupant Name: QUILLER MARY ANN %PAM TURNER N/A	Owner/Occupant: 2303 W CUCHARRAS ST	Owner City, State, Zip: COLORADO SPRINGS, CO 80904-0000

It has been determined by inspection that the property in [309 NINTH ST](#), the City of Alamosa described above is in violation of one or more of the following City ordinances:

14-51 Weeds, Noxious Vegetation, Trash & Rubbish

ACTION(S) REQUIRED TO CORRECT:
PLEASE REMOVE ALL THE TRASH AROUND THE PROPERTY AND CUT THE WEEDS THEY ARE TOO TALL FROM THE CRUB OF THE ROAD WAY TO THE ALLY WAY

A re-inspection of the property will be conducted on or after: [07/14/2023](#)

Violation of animal ordinances may result in a summons and the assessment of fines and other penalties, including impoundment of the animal. Failure to remove junked, wrecked, or inoperable vehicles or parts may result in the issuance of a summons and complaint. If weeds, noxious vegetation, trash or rubbish are not removed from the property within seven (7) days of the date of service, if service is by personal delivery, or within ten (10) days, if service is by mail and/or posting, the removal may be done by the city, and the whole cost thereof will be assessed against the property. Reverse for details and for your right to appeal the determination of a nuisance as set forth in this notice.

Inspected by: Community Service Officer [Pedro De Pedro Pablo](#)

Date: [07/07/2023](#) | Alamosa PD: [719.589.2548](#) | CSP Dispatch: [719.589.5807](#)

Issuance of Notice

Mail to Owner Mail to Occupant Notice Posted Personal Service:

THIS IS NOT A SUMMONS

Alamosa Police Department: 425 Fourth St. Alamosa CO 81101 (P) 719.589.2548 (F) 719.589.5257

People's Exhibit #1
Case No. 23-0552

https://www.iworq.net/iworq/0_Pages/popupEditLetterPrint.php?sid=0S9PF0HDTNBY5JWW2VS727JK89400&id=4560732&letterlinkid=18106085&pri... 1/2



So do I need to talk to Officer de Pedro Pablo?

“at his residence 309 9th Street”

How does he know that?

“On July 8, 2023, I gave Donnie a NOV and asked him to cut his weed around the property”



Interlude - Trial Prep

How complex is this case?

How well do I know Officer de Pedro Pablo?

How comfortable is he testifying?

Can I just clear up any questions with a phone call?

Do I need more investigation before filing (am I missing any LOVID elements)?

Is PD command staff OK with me requesting that directly?

Do I need updated info (photos and observation supported testimony) between filing and trial?

If I need to do some witness prep, when?

etc., etc., etc.

Same analysis with simple ordinance violations

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Discovery - CMCRP 216

RULE 216. Discovery and Inspection

(a) By Defendant. Upon the motion of a defendant or upon the court's own motion at any time after the filing of the complaint or summons and complaint the court may order the prosecution to permit the defendant to inspect and copy or photograph any books, papers, documents, photographs, or tangible objects that are within the prosecution's possession and control, upon a showing that the items sought may be material to the preparation of the defense and that the request is reasonable. The order shall specify the time, place, and manner of making the inspection and of taking the copies or photographs and may prescribe such terms and conditions as are just.

(b) Witness's Statements. At any time after the filing of the complaint or summons and complaint, upon the request of a defendant or upon the order of court, the prosecution shall disclose to the defendant the names and addresses of persons whom the prosecution intends to call as witnesses at the hearing or trial, together with any witness statements.

(e) Additional Rules. Municipal courts may make such additional rules for discretionary or mandatory discovery by the defense or by the prosecution as are consistent with these rules and with any applicable law.



Standing Orders? Going above and beyond?

MUNICIPAL COURT, Alamosa, Colorado 300 Hunt Avenue Alamosa, CO 81101	<p style="text-align: center;">↑ COURT USE ONLY ↑</p>
	Case Number(s):
STANDING ORDER CONCERNING PRE-TRIAL DISCOVERY MATTERS	

Pursuant to C.M.C.R.P. 216(b) and (e), the Court hereby orders that the prosecution, in addition to any other provisions or orders in any specific case, shall provide pre-trial discovery as follows:

1. No later than 5 calendar days before any trial, the prosecution shall mail, e-mail, fax, or personally deliver to the defendant, and file with the court, a list of the names and addresses of persons the prosecution intends to call as witnesses at the hearing or trial.
2. If requested by the defendant, the prosecution shall provide, in addition to other matters that may be requested by the defendant, and not otherwise protected from discovery, copies of a defendant's CCIC record if in the possession of the prosecution. The prosecution shall also provide information the prosecution deems relevant from a defendant's CCIC record to the Court in the context of sentencing.

Done and signed this 11th day of January, 2019.

BY THE COURT


 Municipal Court Judge



Amending CMCRP 216

Current: One part, one page, simple

Proposed: 4 parts, many pages:

<https://www.coloradomunicipalcourts.org/municipal-court-rules-of-procedure-committee/>



Venue

Pretty simple, it's just like location

Or is it?



I
D

“I gave Donnie a NOV and asked him to cut his weed around the property.”



**Alamosa Police Department
City & County of Alamosa, State of Colorado**

Citation# E016804

PR / CR#

Defendant's Name (Last)	(First)	(Middle)	Age	DOB
TURNER	DONNIE	LEE		
Address				
309 9TH ST		City	State/Zip	Phone
		ALAMOSA	CO81101	NA
Mailing Address				
		City	State/Zip	
Drivers License #				
95	CO	DL Type	Race	Sex
			M	M
Vehicle License #		Scale	V.I.N.	Vin Color
Veh Year				
Make		Model	Style	
CMV DOT #				
No				
Registered Owner Name (Last)				
(First)		(Middle)	(Suffix)	
RD Address				
RD City		RD State/Zip		
		COV		

YOU ARE SUMMONED AND ORDERED TO APPEAR TO ANSWER CHARGES AS STATED BELOW AT:

Court Name: ALAMOSA MUNICIPAL COURT Court Date: 08/07/2023
Court Address: 300 Hunt Ave Court Time: 09:00 AM
Alamosa, CO 81101

TO ANSWER TO THE CHARGE(S) OF VIOLATING THE FOLLOWING SECTION(S) OF THE CITY CODE OF THE CITY OF ALAMOSA, STATE OF COLORADO, AS AMENDED, AND THE MODEL TRAFFIC CODE FOR COLORADO MUNICIPALITIES, AS AMENDED, AT THE APPROXIMATE LOCATION OF:

309 9TH ST
 at the approximate time of: 07/15/2023/09:44 Dr. Travel Dr. Turn

Charge No. 1	Stop Result	Statute	Com. Code
	CITATION	14-56	7502
Description			
FAILURE TO ABATE			

Fine	Points
COURT REQD	COURT REQD

Total Fine	Total Surcharge	Total Due	Total Points
COURT REQD	COURT REQD	COURT REQD	COURT REQD

Speed Determined By	Speed (MPH)	Speed Limit (MPH)
<input type="checkbox"/> Accident	<input type="checkbox"/> Injury	<input type="checkbox"/> Arrest
<input type="checkbox"/> School Zone	<input type="checkbox"/> Construction Zone	<input type="checkbox"/> Interpreter Needed

MANDATORY APPEARANCE: You are required to appear in Court at the time, date, and place indicated above.
 Without admitting guilt, I hereby promise to appear at the date, time, and place indicated above. Failure to appear constitutes a separate offense and will result in a warrant being issued for arrest.

DEFENDANT: Donnie Turner
 NOTICE: SEE INSTRUCTIONS BELOW

THE UNDERSIGNED HAS PROBABLE CAUSE TO BELIEVE THAT THE DEFENDANT COMMITTED THE OFFENSE(S) AGAINST THE PEACE AND DIGNITY OF THE PEOPLE OF THE STATE OF COLORADO, CITY OF ALAMOSA AND AFFIRMS THAT A COPY OF THIS SUMMONS AND COMPLAINT WAS DULY SERVED UPON THE DEFENDANT.

Date: 07/15/2023 Officer: P. DE PEDRO PABLO Badge: 51

Officer Notes:

2nd Officer:	# of Occupants:
Ethnicity:	Unit: 31
County: ALAMOSA	
City: ALAMOSA	
DL Expires: 07/01/2027	STEP:
CDL: No	Dist Driving Factor:
Weather:	Traffic:
Surface Conditions:	Attitude:
Reg Exp:	Road Type:
Body Worn Camera: Yes	Interp Language: 0
Pounds Overweight: 0	Parent Name:
School:	Grade:
Mailing Address Type:	SSN:
Speed Determined:	Radar/Lidar #:
Vis Est:	Distance:
Radar Calibrated:	
Stop Info	
Sequence: 1	Agency ORI: CO0020100
Initiation: PRO	Reason For Contact: PRO
Search Cond?: No	Force Used: No
Duration:	Collected Method: OT
Location Type: Residence/home	
Stop Action	
Result For Contact: CITA	Seizure: No
Offense Charged: COTH	
Suspected Crime:	
Stop Search	
Requested Permission to Search: No	Search Conducted:
Granted Permission to Search: No	Contraband Found: No
Unannounced Entry: No	Basis For Person Search:
Warrant:	Basis For Vehicle Search:
Show-up: No	Basis For Property Search:
Outcome of Show-Up:	
Eyewitness	
Eyewitness Gender:	Eyewitness Race:
Eyewitness Ethnicity:	
Force	
Subject Injury Severity:	Exhibited Weapon:
Transp. to Hosp.:	
Weapon Type:	
Ambulance Call:	



Interlude - In court ID

What About The Suggestiveness Of The In Court Identification?

It is extraordinarily rare for a judge to suppress an in court identification for being “too suggestive” – as historically an in court identification at trial has always been allowed.

Unless a “very substantial likelihood of irreparable misidentification exists, identification evidence goes to the jury to determine what weight to assign the evidence.”

BUT – after the application of the “Monroe Factors” – a Court may find that the danger of irreparable misidentification may actually exist. Once again – in determining whether the witness’s in-court identification is based upon the witness’s prior independent observations, a Court considers the same 5 factors – listed above –

<https://www.denver-colorado-criminal-lawyer.com/stages-of-a-criminal-case/colorado-criminal-lawyer-series-hes-the-one-lineups-and-show-ups-in-colorado>



Monroe Factors

***People v. Monroe* 925 P.2d 767 (Colo. 1996)**

- (1) the opportunity of the witness to view the criminal at the time in question;
- (2) the witness's degree of attention;
- (3) the accuracy of any prior description of the criminal by the witness;
- (4) the level of certainty demonstrated by the witness at the later confrontation; and
- (5) the time that has elapsed between the crime and the confrontation.

The typical in court identification of a defendant is the same as a one-on-one showup and is clearly and “undoubtedly suggestive.” However in court identifications will be permitted in almost every case.. Unless the “corrupting effect of the suggestive identification under the totality of the circumstances suggests “a very substantial likelihood of misidentification.”

<https://www.denver-colorado-criminal-lawyer.com/stages-of-a-criminal-case/colorado-criminal-lawyer-series-hes-the-one-lineups-and-show-ups-in-colorado>



Additional Interlude - CRE 404(b)(3)



People's Exhibit #5
Case Nos. 22-0670, 22-0671

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Rule 404(b)

(b) Other crimes, wrongs, or acts.

(1) Prohibited Uses. Evidence of any other crime, wrong, or act is not admissible to prove a person's character in order to show that on a particular occasion the person acted in conformity with the character.

(2) Permitted Uses. This evidence may, be admissible for another purposes, such as proving motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake, or lack of accident,

(3) Notice in a Criminal Case. In a criminal case, the prosecutor must:

(A) provide reasonable notice of any such evidence that the prosecutor intends to offer at trial, so that the defendant has a fair opportunity to meet it;

(B) articulate in the notice the permitted purpose for which the prosecutor intends to offer the evidence and the reasoning that supports the purpose; and

(C) do so in writing before trial-or in any form during trial if the court, for good cause, excuses lack of pretrial notice.



Date/Time

This one really is simple

Except. . .



Cold(ish) cases and e-citations

Simple: make sure the date and time on the citation match the date and time in the report.

If not. . .



Remedies - think about what the city is trying to accomplish - presumably compliance

This really should be up under case prep, because it will influence how the case is presented

finer, increasing each day? injunction -

set time after which city can perform and have lien
potential for jail for contempt

alternative remedies: volunteer assistance, city assistance



Alternative Remedies Success Story

The Walsh Hotel

Write a description for your map.

Legend



Google Earth

© 2023 Google

8.61 ft





Alamosa Police Department

425 4th Street
Alamosa, Colorado 81101

Ken Anderson, Chief of Police

October 21, 2020

John Treinen or C/O
Eric Treinen
8529 US Highway 285 S
Alamosa, CO. 81101

Re: Notice of Violation of 615 & 617 6th Street. Alamosa, CO. 81101
Dear: Property Owner or Responsible Person 615 & 617 6th Street.

You are hereby given notice and an order, pursuant to Section 107 and 108.3 of the International Property Maintenance Code (the code) to address violations at 615 & 617 6th Street. Alamosa, CO. 81101, which has a legal description of LOTS 25 THRU 28 ALAMOSA BLK50 & FR LOTS 23 & 24 BEG AT NW COR LOT 24 TH E 4.3' TH S 91.6' TH E 20.7' TO PT ON W LINE OF LOT 23 TH E 11.2' TH S 58.4' TO PT ON S LINE OF LOT 23 TH W36.2' TO SW COR LOT 24 TH N 150' TO POB.

The violations are the following:

1. Section 304 (12)/ Section 307.1: Exterior stairs that service the egress and emergency escape for 2nd level apartments are not structurally sound. Not capable of supporting nominal loads, especially with guard rails that should maintain 200 lbs per IBC Code.
2. Section 304 (8) Roofing and roofing components have defects and deterioration. There is evidence of multiple water damaged areas.
3. Section 308.1 Accumulation of rubbish and garbage.
4. Section 403.1 Openable windows at every habitable space. Many of the windows are broken and likely not properly functioning.
5. Section 403.2 Bathroom and toilet room. The one apartment quarters we entered had noncompliant ventilation in the bathroom area. Room was unsanitary and rubbish, trash and debris.
6. Section 404.4.5- There was an individual living in a storage area. Not suitable for habitable space.
7. Chapter 7 IBC- Smoke and detectors and emergency escape requirements are non-compliant.

Police Headquarters
425 4th Street
Alamosa, Colorado 81101
(719) 589-2548

"Protect & Serve"

Mailing Address
P.O. Box 1101
Alamosa, CO 81101
Fax: (719) 589-5257



Alamosa Police Department

425 4th Street
Alamosa, Colorado 81101

Ken Anderson, Chief of Police

8. Section 108 1.2 Unsafe equipment. - Mechanical ventilation and air exchange of roof top unit is not effective and deteriorated beyond use. Further investigation would be required. (This likely services the restaurant area).
9. Section 18 1.2 unsafe equipment- Exhaust hood is not properly maintained and has noncompliant clearance. There is obvious heat damage to the side wall of the building. This is an unsafe condition.
10. Section 305.4 interior handrail is partially attached and others missing altogether.
11. Section 305.6 Interior doors do not fit, missing, or have double locks with lath and paddle locks. This is an unsafe condition and does not allow for one motions exit device and proper egress or emergency escape.
12. Section 603.1 Mechanical appliances- not properly maintained.
13. Section 603.1 Mechanical appliances- baseboard heat registers missing covers and not properly maintained.
14. Section 602 Heating Facilities not properly maintained. Further investigation required.
15. Section 605.3 Luminaires- Non compliant light in public areas and emergency exits.
16. Section 704.2 Smoke alarms non-compliant.
17. Section 304.1.1 (8). Covered Patio area is an unsafe structure and should be demolished as per section 110. 1.

Order to Correct:

You are hereby ordered to correct the violations as set forth above to bring them into compliance with the code. The corrections must be completed within 28 days of your receipt of this letter as evidenced by affidavit of service or certified mail return receipt and affidavit of posting if no delivery. If an extension is needed, please contact the investigating officer upon the inspection date. The investigating officer can allow additional time to meet compliance as long as they see progress as it relates to the violations aforementioned.

Failure to Correct:

Police Headquarters
425 4th Street
Alamosa, Colorado 81101
(719) 589-2548

"Protect & Serve"

Mailing Address
P.O. Box 1101
Alamosa, CO 81101
Fax: (719) 589-5257



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Incident # 21-1527 JUAREZ, F On July 15, 2021 at approximately 1303 hours, I Officer (CSO) F. Juarez conducted a follow up on Notice of Violation on 617/615 6th Street (Walsh Burger). This is in the City and County of Alamosa and State of Colorado. Eric Treinen failed to meet any of the conditions stipulated in the notice of violation. Mr Treinen also failed to claim two certified letters that were sent to his residence. The Walsh building was determined to be dangerous and unsafe to occupy. Treinen was issued a summons due to not complying or attempting to come up to code with the building. Nothing further at this time



**AGREEMENT FOR REMEDIATION OF PROPERTY
617 6TH STREET, ALAMOSA, COLORADO**

THIS AGREEMENT, dated August 10, 2021, is between the CITY OF ALAMOSA, COLORADO (“City”) and ERIC TREINEN, as PERSONAL REPRESENTATIVE OF THE ESTATE OF JOHN P. TREINEN A/K/A JOHN PATRICK TREINEN (“Treinen”) to set forth the parties’ agreement concerning remediation of building code violations at LOTS 25 THRU 28 ALAMOSA BLOCK 50 & A FRACTION OF LOTS 23 & 24 BEGINING AT THE NW CORNER OF LOT 24 THENCE EAST.3 FEET, THENCE SOUTH 91.6 FEET, THENCE EAST 20.7 FEET TO A POINT ON WEST LINE OF LOT 23 THENCE EAST 11.2 FEET THENCE SOUTH 58.4 FEET TO A POINT ON THE SOUTH LINE OF LOT 23 THENCE WEST 36.2 FEET TO THE SW CORNER OF LOT 24 THENCE NORTH 150 FEET TO POB, also known as the Walsh Hotel, 617 6th Street, Alamosa, Colorado (the “Property”):

1. The Property is in violation of various provisions of the International Property Maintenance Code, adopted by the City. Specifically, the Property is subject of the following noted violations:
 - a. Section 304 (12)/ Section 307.1: Exterior stairs that service the egress and emergency escape for 2nd level apartments are not structurally sound. Not capable of supporting nominal loads, especially with guard rails that should maintain 200 lbs per IBC Code.
 - b. Section 304 (8) Roofing and roofing components have defects and deterioration. There is evidence of multiple water damaged areas.
 - c. Section 308.1 Accumulation of rubbish and garbage.
 - d. Section 403.1 Openable windows at every habitable space. Many of the windows are broken and likely not properly functioning.
 - e. Section 403.2 Bathroom and toilet room. The one apartment quarters we entered had noncompliant ventilation in the bathroom area. Room was unsanitary and rubbish, trash and debris.
 - f. Section 404.4.5- There was an individual living in a storage area. Not suitable for habitable space.
 - g. Chapter 7 IBC- Smoke and detectors and emergency escape requirements are non-compliant.
 - h. Section 108 1.2 Unsafe equipment. - Mechanical ventilation and air exchange of roof top unit is not effective and deteriorated beyond use. Further investigation would be required. (This likely services the restaurant area).
 - i. Section 18 1.2 unsafe equipment- Exhaust hood is not properly maintained and has noncompliant clearance. There is obvious heat damage to the side wall of the building. This is an unsafe condition.
 - j. Section 305.4 interior handrail is partially attached and others missing altogether.



k. Section 305.6 Interior doors do not fit, missing, or have double locks with lath and paddle locks. This is an unsafe condition and does not allow for one motions exit device and proper egress or emergency escape.

l. Section 603.1 Mechanical appliances- not properly maintained.

m. Section 603.1 Mechanical appliances- baseboard heat registers missing covers and not properly maintained.

n. Section 602 Heating Facilities not properly maintained. Further investigation required.

o. Section 605.3 Luminaires- Non compliant light in public areas and emergency exits.

p. Section 704.2 Smoke alarms non-compliant.

q. Section 304.1.1 (8). Covered Patio area is an unsafe structure and should be demolished as per section 110. 1.

r. A structural engineer will need to examine the building for any structural problems that may exist after the fire that occurred on November 25, 2020, and any problems identified must be corrected if the building is to remain.

2. Before a number of the violations can be remedied, a hazardous materials permit must first be obtained from the Colorado Department of Public Health and Environment.
3. Treinen agrees to obtain the necessary permits and conduct remediation of the issues referenced above. Such remediation work shall commence no later than September 1, 2021, and shall be diligently pursued until completion. Completion shall be no later than June 30, 2022. For purposes of this paragraph, the commencement of work shall consist of commencement of hazardous materials remediation or of any remediation work that may be performed prior to abatement of hazardous materials.
4. In the event work is not commenced by September 1, 2021, or, once commenced, is not pursued with diligence, the City may undertake the work itself, or may demolish the building, in its sole and absolute discretion. Any costs incurred by the City shall be a lien against the property, with a lien priority date as of the date of this Agreement, and collected in the same manner as a lien for unpaid taxes.
5. Treinen shall reimburse the City the amount of \$629.86 incurred by the City for materials and labor expended in boarding up the building to make it safe.
6. The enforcement of the terms and conditions of this Agreement and all rights of action relating to such enforcement, shall be strictly reserved to the City and Treinen, and nothing contained in this Agreement shall give or allow any such claim or right of action by any other or third person under this Agreement.



The EPA steps up

Doug Jamison

Superfund/Brownfields Unit Leader

State of Colorado, Dept. of Public Health and
Environment

4300 Cherry Creek Drive South, Denver 80246

office: 303.692.3404 | cell: 303.913.9375

email: doug.jamison@state.co.us



