

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:25-cv-03790-KAS

BISSER LISSITCHEV,

Petitioner

v.

JUAN BALTASAR, Warden, GEO Group ICE Processing Center,
ROBERT HAGAN, Field Director of the Denver Field Office,
KRISTI NOEM, Secretary, U.S. Department of Homeland Security,
PAMELA BONDI, U.S. Attorney General, and
TODD M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement,
in their official capacities,

Respondents

STIPULATION OF FACTS

Petitioner and Respondent agree that the following facts can be taken as true without further proof for purposes of the evidentiary hearing set in this case for January 6, 2026, at 1:30 p.m., before Magistrate Judge Kathryn A. Starnella:

1. Petitioner Bisser Lissitchev is a native and citizen of Bulgaria.
2. On January 18, 1999, Mr. Lissitchev was admitted to the United States on a nonimmigrant visa with permission to remain for a temporary period.
3. On October 20, 1999, a Notice to Appear was issued to Mr. Lissitchev, initiating removal proceedings under 8 U.S.C. § 1229a. The Notice to Appear charged Mr. Lissitchev with being deportable from the United States pursuant to 8 U.S.C. § 1227(a)(1)(B) (noncitizen who is present in the United States for a time longer than permitted).

4. Mr. Lissitchev pursued an application for asylum and withholding of removal before the immigration court. On April 8, 2002, an immigration judge (IJ) denied his application for asylum and ordered him removed from the United States to Bulgaria.

5. On August 10, 2004, the Board of Immigration Appeals granted Mr. Lissitchev's motion to reopen and remanded his case to the IJ.

6. On May 23, 2005, the IJ denied his asylum application and ordered him removed from the United States to Bulgaria but granted withholding of removal to Bulgaria. The IJ's order did not designate an alternative country for removal.

7. In 2014, ICE placed Mr. Lissitchev on an Order of Supervision. Mr. Lissitchev reported for periodic check-ins as part of his supervision requirements. There is no allegation that Petitioner failed to comply with any term or condition of his supervision.

8. On November 8, 2025, Mr. Lissitchev appeared for a scheduled check-in. ICE took him into custody.

9. Mr. Lissitchev is scheduled for a post-removal-order custody review on or about January 12, 2026. He may provide information to support his release in advance of that review.

10. Respondents have asserted that they are working to evaluate and select a third country for removal, in coordination with the U.S. Department of State. See ECF No. 7-1 ¶ 15; ECF No. 11-1 ¶ 9. Petitioner has not been informed of any third country being selected or considered for removal.

11. Mr. Lissitchev is currently in ICE custody at the ICE contract detention facility in Aurora, Colorado.

Dated: January 2, 2026

Respectfully submitted,

s/ Aaron C. Hall
Aaron C. Hall
Joseph & Hall P.C.
12203 East Second Avenue
Aurora, CO 80011
Telephone: 303-297-9171
Email: aaron@immigrationissues.com
Counsel for Petitioner

PETER MCNEILLY
United States Attorney

s/ Jane Bobet Rejko
Jane Bobet Rejko
Assistant United States Attorney
United States Attorney's Office
1801 California Street, Suite 1600
Denver, Colorado 80202
Telephone: (303) 454-0100
Email: jane.bobet.rejko@usdoj.gov
Counsel for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on January 2, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to all counsel of record.

s/ Jane Bobet Rejko
Jane Bobet Rejko
Assistant United States Attorney
Counsel for Respondents