

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF WASHINGTON

SERAFIN RANGEL-SEMBRANO,

Plaintiff,

v.

ADAMS COUNTY SHERIFF'S  
OFFICE, ADAMS COUNTY, EVAN  
ARMSTRONG, Corporal, Adams  
County Sheriff's Office, in his  
individual capacity; DALE  
WAGNER, Sheriff, Adams County  
Sheriff's Office, in his individual and  
official capacity,

Defendants.

No. 2:25-CV-3

DEFENDANTS' ANSWER TO  
COMPLAINT AND  
AFFIRMATIVE DEFENSES

**JURY DEMAND**

Defendant, ADAMS COUNTY SHERIFF'S OFFICE, ADAMS  
COUNTY, EVAN ARMSTRONG, DALE WAGNER, in answer to SERAFIN  
RENGEL-SEMBRANO'S complaint, admits, denies and alleges as follows:

**I. INTRODUCTION**

1. This paragraph contains multiple factual and legal assertions, and  
is therefore denied.

2. This paragraph contains multiple factual and legal assertions, and  
is therefore denied.

3. This paragraph contains multiple factual and legal assertions, and  
is therefore denied.

## II. JURISDICTION AND VENUE

4. Defendants admit this Court has jurisdiction.

5. Defendants admit venue is proper.

6. Defendants admit this Court is empowered to hear the claims, but deny Plaintiff can establish any right to the relief requested.

## III. PARTIES

7. Defendants deny for lack of knowledge the allegations contained in paragraph 7 of Plaintiff's Complaint.

8. Defendants deny that Adams County Sheriff's Office is a legal entity amenable to suit. The Sheriff's Office is an agency of the County, and only the County is a proper party.

9. Defendants admit the County is responsible for the Adams County Sheriff's Department, as well as the Adams County Jail.

10. Defendants admit Mr. Armstrong was a Corporal assigned to the Adams County Jail. Defendants deny Corporal Armstrong was a legal custodian of Plaintiff at all times relevant.

11. Defendants admit Sheriff Wagner is the Sheriff, but deny any basis for him to be sued in his individual capacity. Defendants further deny that Sheriff Wagner is liable to Plaintiff in any way, either individually or in his official capacity. Defendants further deny that Plaintiffs have properly alleged an "official capacity" claim against any governmental entity.

## IV. STATEMENT OF FACTS

### Mr. Rangel's Arrest and Booking

12. Defendants admit the allegations contained in paragraph 12 of Plaintiff's Complaint.

13. Defendants admit the allegations contained in paragraph 13 of Plaintiff's Complaint.

14. Defendants admit the allegations contained in paragraph 14 of

1 Plaintiff's Complaint.

2 15. Defendants admit Plaintiff was detained, interviewed, and  
3 eventually arrested.

4 16. Defendants deny the allegations contained in paragraph 16 of  
5 Plaintiff's Complaint.

6 17. Defendants admit the allegations contained in paragraph 17 of  
7 Plaintiff's Complaint.

8 18. Defendants admit the allegations contained in paragraph 18 of  
9 Plaintiff's Complaint.

10 19. Defendants admit the allegations contained in paragraph 19 of  
11 Plaintiff's Complaint.

12 20. Defendants admit the allegations contained in paragraph 20 of  
13 Plaintiff's Complaint.

14 21. Defendants deny for lack of knowledge the allegations contained  
15 in paragraph 21 of Plaintiff's Complaint.

16 22. Defendants deny for lack of knowledge the allegations contained  
17 in paragraph 22 of Plaintiff's Complaint.

18 23. Defendants deny for lack of knowledge the allegations contained  
19 in paragraph 23 of Plaintiff's Complaint.

20 24. This paragraph contains a legal conclusion, and is therefore denied.

21 25. Defendants admit the allegations contained in paragraph 25 of  
22 Plaintiff's Complaint.

23  
24 **Adams County Prosecutors and the District Court Clear Mr. Rangel for  
Release**

25 26. Defendants deny the allegations contained in paragraph 26 of  
26 Plaintiff's Complaint.

27 27. Defendants admit the prosecutor issued a release letter.

1           28. Defendants admit the prosecutor declined to file charges.

2           29. Defendants admit the allegations contained in paragraph 29 of  
3 Plaintiff's Complaint..

4           30. Defendants admit that the Franklin County jail received the order.

5  
6 **Corporal Armstrong Transports Mr. Rangel to U.S. Border Patrol  
Custody**

7           31. It is unclear which "Sheriffs' Office" is referred to here, or which  
8 office is alleged to have authority to release a detainee from custody of the  
9 Franklin County Jail.

10          32. Defendants admit that Corporal Armstrong, an Adams County  
11 employee, notified Franklin County that he would be retrieving an Adams  
12 County detainee for transport back to Adams County.

13          33. To the extent this paragraph alleges the law requires Franklin  
14 County to immediately release an Adams County detainee into Franklin County,  
15 defendants deny that allegation.

16          34. Defendants admit that Plaintiff was cleared for release, and was  
17 then transported back to Adams County, the County in which he was arrested,  
18 and the County in which he resided.

19          35. Defendants deny the allegations contained in paragraph 35 of  
20 Plaintiff's Complaint.

21          36. Defendants deny the allegations contained in paragraph 36 of  
22 Plaintiff's Complaint.

23          37. Defendants admit that Corporal Armstrong took custody of  
24 Plaintiff and transported him back to Adams County, where he had been arrested  
25 and where he resided.

26          38. Defendants admit that Corporal Armstrong took custody of  
27 Plaintiff and transported him back to Adams County, where he had been arrested

1 and where he resided.

2 39. Defendants deny the allegations contained in paragraph 39 of  
3 Plaintiff's Complaint.

4 40. Defendants deny the allegations contained in paragraph 40 of  
5 Plaintiff's Complaint.

6 41. Defendants deny for lack of knowledge the allegations contained  
7 in paragraph 41 of Plaintiff's Complaint.

8  
9 **Adams County Sheriff's Office Immigration Hold Policy and Washington's  
Keep Washington Working Law**

10 42. This paragraph contains legal conclusions and therefore the  
11 Defendants deny the allegations contained in paragraph 42 of Plaintiff's  
12 Complaint.

13 43. This paragraph contains legal conclusions and therefore the  
14 Defendants deny the allegations contained in paragraph 43 of Plaintiff's  
15 Complaint.

16 44. The law cited by this paragraph speaks for itself, and this paragraph  
17 does not require a response from Defendants.

18 45. The law cited by this paragraph speaks for itself, and this paragraph  
19 does not require a response from Defendants.

20 46. The law cited by this paragraph speaks for itself, and this paragraph  
21 does not require a response from Defendants.

22 47. Defendants deny the allegations contained in paragraph 47 of  
23 Plaintiff's Complaint.

24 48. Defendants deny the allegations contained in paragraph 48 of  
25 Plaintiff's Complaint.

26 49. Defendants deny the allegations contained in paragraph 49 of  
27 Plaintiff's Complaint.

1           50. Defendants admit the allegations contained in paragraph 50 of  
2 Plaintiff's Complaint.

3           51. Defendants admit the allegations contained in paragraph 51 of  
4 Plaintiff's Complaint.

5           52. Defendants deny the allegations contained in paragraph 52 of  
6 Plaintiff's Complaint.

7           53. Defendants deny that the applicable policy contains the word  
8 "shall." Moreover, the policy manual speaks for itself.

9           54. Defendants admit the allegations contained in paragraph 54 of  
10 Plaintiff's Complaint.

11           55. Defendants deny the allegations contained in paragraph 55 of  
12 Plaintiff's Complaint.

13           56. Defendants deny the allegations contained in paragraph 56 of  
14 Plaintiff's Complaint.

15           57. Defendants deny the allegations contained in paragraph 57 of  
16 Plaintiff's Complaint.

17           58. Defendants deny the allegations contained in paragraph 58 of  
18 Plaintiff's Complaint.

19           59. Defendants admit that activist organizations and others have  
20 repeatedly threatened baseless litigation in an effort to obtain and exercise  
21 control over Adams County police and correctional practices.

22           60. Defendants admit that they did not comply with the legally baseless  
23 demands of outside entities with regard to police and correctional practices.

24           61. Defendants deny the allegations contained in paragraph 61 of  
25 Plaintiff's Complaint.

26           62. Defendants admit the allegations contained in paragraph 62 of  
27 Plaintiff's Complaint.

1 63. Defendants admit the allegations contained in paragraph 63 of  
2 Plaintiff's Complaint.

3 **V. CAUSES OF ACTION**

4 **COUNT I**

5 **Detention in Violation of Civil Rights – 42 U.S.C. § 1983**  
6 **(Against Defendants Adams County Sheriff's Office**  
7 **and Adams County)**

8 64. See above.

9 65. This paragraph does not require a response from Defendants.

10 66. Defendants deny that the Sheriff's office is an independent entity  
11 amenable to suit.

12 67. Defendants admit the allegations contained in paragraph 67 of  
13 Plaintiff's Complaint..  
14

15 68. Defendants admit they acted under color of state and federal law.

16 69. Defendants deny the allegations contained in paragraph 69 of  
17 Plaintiff's Complaint.  
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19 70. Defendants deny the allegations contained in paragraph 70 of  
20 Plaintiff's Complaint.  
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22 71. Defendants deny the allegations contained in paragraph 71 of  
23 Plaintiff's Complaint.  
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25 72. Defendants deny the allegations contained in paragraph 72 of  
26 Plaintiff's Complaint.  
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**VI. PRAYER FOR RELIEF**

Defendants deny that Plaintiff is entitled to any relief as a result of any allegations included in the complaint.

BY WAY OF FURTHER ANSWER and AFFIRMATIVE DEFENSE, Defendants state and allege as follows:

1. **FAILURE TO STATE A CLAIM:** That the Plaintiff has failed to state a claim upon which relief may be granted.
2. **LAWFUL ARREST:** That the arrest of the Plaintiff was lawful.
3. **QUALIFIED IMMUNITY:** Defendants contend that Plaintiff's claims are precluded by the doctrine of qualified immunity.

**PRAYER FOR RELIEF**

WHEREFORE, Defendants ADAMS COUNTY SHERIFF'S OFFICE, ADAMS COUNTY, EVAN ARMSTRONG, and DALE WAGNER, pray for the following relief:

1. That Plaintiff's complaint be dismissed with prejudice, and that Plaintiff take nothing by his complaint;
2. That Defendants be allowed their statutory costs and reasonable attorney fees incurred herein; and
3. For such additional relief the Court may deem just and equitable.

**JURY TRIAL DEMANDED**

The Defendants respectfully demand their right to a trial by jury in this matter.

DATED this 3rd day of March, 2025.

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2 KEATING, BUCKLIN & McCORMACK,  
3 INC., P.S.

4  
5 By: /s/ Jeremy W. Culumber  
6 Jeremy W. Culumber, WSBA #35423  
7 *Attorney for Defendants*

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 3, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

**Attorneys for Plaintiff**

Matt Adams, WSBA #28287  
Glenda Aldana Madrid, WSBA #46987  
Leila Kang, WSBA #48048  
Aaron Korthuis, WSBA #53974  
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and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

N/A

DATED: March 3, 2025

/s/ Jeremy W. Culumber  
Jeremy W. Culumber, WSBA #35423  
Email: jculumber@kbmlawyers.com