

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

Criminal Case No. 23-cr-00074-NYW

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. DEJANE REANIECE LATTANY,

Defendant.

**UNITED STATES' MOTION TO DECREASE OFFENSE LEVEL BY ONE
ADDITIONAL LEVEL PURSUANT TO U.S.S.G § 3E1.1(b)**

The United States of America respectfully moves the Court to decrease the offense level by one additional level pursuant to United States Sentencing Guidelines §3E1.1(b). As grounds therefore, the government states:

(1) The defendant has clearly demonstrated acceptance of responsibility for her offense and is entitled to a decrease in the offense level by two levels pursuant to U.S.S.G. §3E1.1(a). The U.S. Probation Office has reached this same conclusion in the Presentence Investigation Report. (ECF No. 15 ¶ 52.)

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(2) The defendant has assisted authorities in the investigation or prosecution of her own misconduct by timely notifying authorities of her intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the Court to allocate their resources efficiently.

Respectfully submitted this 1st day of August, 2023.

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United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2023, I electronically filed the foregoing **UNITED STATES' MOTION TO DECREASE OFFENSE LEVEL BY ONE ADDITIONAL LEVEL PURSUANT TO U.S.S.G § 3E1.1(b)** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record in this case.

s/ Stephanie Price

Stephanie Price

Legal Assistant

United States Attorney's Office