

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

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO
8:32 am, Sep 19, 2023
JEFFREY P. COLWELL, CLERK

UNITED STATES OF AMERICA,
Plaintiff,

) **No. 1:23CR00074-1**
)

v.

) **STIPULATION AND ORDER FOR**
) **EXTENSION OF SELF SURRENDER DATE**

DEJANE REANIECE LATTANY
Defendant.

)
) **Judge: Nina Y. Wang**

)

)

MOTION TO EXTEND SELF-SURRENDER DATE PURSUANT TO FEDERAL RULE 38

Ms. DEJANE REANIECE LATTANY, Defendant, Pro se [HERINAFTER REFERRED TO AS DEFENDANT]. **COMES NOW**, and respectfully requests this Honorable Court to grant the Motion to extend the self-surrender date FROM SEPTEMBER 28, 2023 TO November 30th, 2023 based on **FEDERAL RULE 38 and other following circumstances.**

1. **Background:** On August 15, 2023 this Court sentenced me to surrender to the institution designated by the United States Bureau of Prisons for service of sentence of 48 months imprisonment and ordered the Defendant to voluntarily surrender to the designated institution of FCI Victorville Satellite Camp, 13777 Air Expressway, Victorville, California on September 28, 2023, by 12:00pm.
2. **Reason for Extension:**
 - A) The defendant is a single mother of 3 minor children ranging from 1 year to 11 years old. Therefore, in order to arrange for the defendant's children to receive the proper care and environment during the defendant's absence, it is necessary for such extension to be granted in order to arrange the preparation of their stay with family. In order for the children to go through this separation from the defendant, it is imperative that the time to prepare the defendant's

children and family is granted. In addition, the defendant's 1 year old is in need of the time to properly wean off of his regular supply and comfort of breastfeeding. The defendant also has a series of court hearings to protect her children. (See **Exhibit A** with case number for children)

B) The defendant is scheduled to graduate from University of Phoenix on October 7th 2023. Graduation represents not only the culmination of more than 4 years of rigorous academic work but also a significant milestone for her children and family. The defendant wishes to participate in the graduation ceremony which would provide a sense of closure and fulfillment before serving the imposed sentence. Upon the exit of the defendant's sentence, the earned degree will enable the defendant to be a productive member of society, become an asset to her community and obtain and maintain employment to support her children and family. In addition to graduation, the defendant has had the honor of being inducted into the National Honors Society chapter of the University of Phoenix. The defendant would like time to complete the outstanding required tasks for the induction to take place before serving the sentence. The defendant will utilize the skills learned from the induction to become a positive leader and citizen while helping others to make positive changes in their lives. (See **EXHIBIT B1-B2** for proof of graduation and induction)

C) In addition, the defendant asks that the court take into consideration that the defendant's previous counsel Jason Flores Williams completed duty in informing the defendant that she would be sentenced to a facility located in Colorado, where the defendant's family and children are. Upon receiving the order from the court that defendant would be sentenced in a completely different state, the defendant requests to have time to help children and family to wrap up personal and family affairs for the well-being of the defendant's children. In addition, As previously stated, the defendant received notice that the former attorney Jason Flores-Williams terminated their representation without providing defendant with crucial documents necessary for the defendant's **CASE** and **APPEAL**. Specifically, the defendant was not provided with the needed Judgement and Commit Order, Pre-Sentence Report (PSR) prior to sentencing, and only received both the PSR and sentencing memorandum after the sentencing had taken place. Defendant received the Judgement and Comment order and BOP designation in the mail on September 12th. Within the event of the defendant's attorney withdrawing without proper communication, the defendant has been left to put together this motion and appeal without understanding important elements of the case. The defendant understands the importance of adhering to the court's schedule and procedures. If there are specific steps or formalities necessary to grant an extension to surrender, please let the defendant know, and the defendant will ensure prompt compliance.

3. **No Prior Requests:** This is the defendant's first request for an extension of the self-surrender date, and it is based on a unique, non-recurring event.
4. **Request for Extension:** Respectfully, the Defendant humbly requests the court to grant this motion for extension of the self-surrender date September 28, 2023 to November 30, 2023. If this motion is granted, the defendant will utilize the extended time to ensure that upon the exit of the sentence, the defendant will be a guaranteed asset to the community and a productive citizen of society.

5. **No Risk to the Community or Flight Risk:** The defendant has complied with all conditions of pretrial release, has no history of failing to appear, and poses no risk to the community. The defendant's commitment to completing the educational program and achieving this milestone demonstrates a dedication to personal development and societal contributions. Granting this motion would not diminish the seriousness of the offense or the imposed sentence, but instead allow the defendant to achieve important personal and academic milestones.
6. **Federal Rule 38:** Pursuant to Federal Rule of Criminal Procedure 38(b)(2), the Court has the discretion to order a defendant's self-surrender at a later date. Given the unique and significant nature of her children, college graduation, national honors society induction and termination of counsel, the Defendant believes the circumstances warrant the Court's gracious consideration of this request.

WHEREFORE, the Defendant DEJANE REANIECE LATTANY, respectfully requests that this Honorable Court grant the Motion to Extend Self-Surrender Date, allowing the Defendant to properly prepare children and family for the defendant's absence, to ensure a healthy and safe environment for the children and to participate in the graduation ceremony, complete Chapter induction and family business and thereafter voluntarily surrender to the designated institution on November 30th 2023.

Respectfully submitted,
DEJANE REANIECE LATTANY, Pro se
11125 Quintero Ct Commerce City Colorado 80022
720-318-0173
dejane_lattany@msn.com

EXHIBIT A



Denver Juvenile Pro Se / Self Help Center
520 West Colfax, **Room 125**
Denver, Colorado 80204

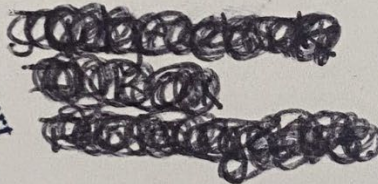
Jenni

23JA75

Case Number

Center Hours M-F 8-12pm, 1-4pm (except court holidays)
Telephone Number (303) 606-2849 • Fax (303) 606-2280

Forms available on-line at www.courts.state.co.us



Main: (303) 606-2307
Fax: (303) 606-2280

NAME _____ CASE # 23JA75

Next hearing _____

Time _____ Courtroom _____

Denver Juvenile Court
Lindsey-Flanigan Courthouse

520 W. Colfax, Room 125
Denver, Colorado 80204

EXHIBIT A

This is the case number that is attached to the set of hearings mentioned to protect my children.

EXHIBIT B1

Your tickets

Organized by
University of Phoenix**University of Phoenix Southern California Commencement -
3:30pm**

Honda Center
2695 E Katella Ave, Anaheim, CA 92806, USA

Name
Dejane Lattany
Purchased by
dejane_lattany@msn.com

Ticket type
General Admission



CSKRGNDQW

Ticket description

There will be no assigned seating.

Event Note

University of Phoenix, Inc. shall have the unrestricted right, and such right shall not be revoked by Holder, to use and exploit without any further obligation to Holder, the Holder's image, voice, and likeness, actions and statements (and to edit each and all in any manner fiction or non-fiction) as it appears in any film, photograph, broadcast, telecast, and/or recording made in connection with the Event in any manner, in all media, worldwide, in perpetuity, including without limitation, in any advertisements or promotional materials for University of Phoenix, Inc. or any of its subsidiaries or affiliates without further authorization.

Your tickets

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University of Phoenix



University of Phoenix Southern California Commencement - 3:30pm

 Honda Center
2695 E Katella Ave, Anaheim, CA 92806, USA

Name
Matt Hogan
Purchased by
dejane_lattany@msn.com

Ticket type
General Admission



CPVH1F8XT

Ticket description

There will be no assigned seating.

Event Note

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Your tickets

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University of Phoenix Southern California Commencement - 3:30pm

 Honda Center
2695 E Katella Ave, Anaheim, CA 92806, USA

Name
Jaraine Lattany
Purchased by
dejane_lattany@msn.com

Ticket type
General Admission



CVXCDP08S

Ticket description

There will be no assigned seating.

Event Note

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Your tickets

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University of Phoenix Southern California Commencement - 3:30pm

 Honda Center
2695 E Katella Ave, Anaheim, CA 92806, USA

Name
Floritta Lattany
Purchased by
dejane_lattany@msn.com

Ticket type
General Admission



CDWL9SHP8

Ticket description

There will be no assigned seating.

Event Note

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Your tickets

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University of Phoenix Southern California Commencement - 3:30pm

 Honda Center
2695 E Katella Ave, Anaheim, CA 92806, USA

Name
Ty Lattany
Purchased by
dejane_lattany@msn.com

Ticket type
General Admission



CSMR61W2Y

Ticket description

There will be no assigned seating.

Event Note

University of Phoenix, Inc. shall have the unrestricted right, and such right shall not be revoked by Holder, to use and exploit without any further obligation to Holder, the Holder's image, voice, and likeness, actions and statements (and to edit each and all in any manner fiction or non-fiction) as it appears in any film, photograph, broadcast, telecast, and/or recording made in connection with the Event in any manner, in all media, worldwide, in perpetuity, including without limitation, in any advertisements or promotional materials for University of Phoenix, Inc. or any of its subsidiaries or affiliates without further authorization.

Your tickets

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University of Phoenix Southern California Commencement - 3:30pm

 Honda Center
2695 E Katella Ave, Anaheim, CA 92806, USA

Name
Nova Hogan
Purchased by
dejane_lattany@msn.com

Ticket type
General Admission



CDT7N63SX

Ticket description

There will be no assigned seating.

Event Note

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Your tickets

Organized by
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University of Phoenix Southern California Commencement - 3:30pm

 Honda Center
2695 E Katella Ave, Anaheim, CA 92806, USA

Name
Anezshe Lattany
Purchased by
dejane_lattany@msn.com

Ticket type
General Admission



CHYZD971J

Ticket description

There will be no assigned seating.

Event Note

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Your tickets

Organized by
University of Phoenix



University of Phoenix Southern California Commencement - 3:30pm

 Honda Center
2695 E Katella Ave, Anaheim, CA 92806, USA

Name
Tenea Lattany
Purchased by
dejane_lattany@msn.com

Ticket type
General Admission



CBLQSXCFP

Ticket description

There will be no assigned seating.

Event Note

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Your tickets

Organized by
University of Phoenix



University of Phoenix Southern California Commencement - 3:30pm

 Honda Center
2695 E Katella Ave, Anaheim, CA 92806, USA

Name
Dejane Lattany
Purchased by
dejane_lattany@msn.com

Ticket type
General Admission



CK6230WCM

Ticket description

There will be no assigned seating.

Event Note

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Your order receipt

Order details

Buyer	Dejane Lattany
Event	University of Phoenix Southern California Commencement - 3:30pm
Location	2695 E Katella Ave, Anaheim, CA 92806, USA

Payment Information

Items	Unit price	Quantity	Total
General Admission	Free	9	\$0.00 USD
Total			Free

Reference ID: 6505bf73b1ac4043b4686f7a

We have sent you a confirmation email to dejane_lattany@msn.com

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a *ticketmaster*® company

EXHIBIT B2

The screenshot shows a web browser window with the URL <https://app.nsls.org/members/programs/roi/orientation>. The page is for 'THE NATIONAL SOCIETY OF LEADERSHIP AND SUCCESS'. A user named 'DEJANE LATTANY' is logged in. The main content area features a large checkmark icon and the text 'CONGRATULATIONS! You've received credit for your Orientation'. A sidebar on the left lists navigation options: Programs Overview, Foundations of Leadership, Orientation (selected), LTD, Speaker Broadcasts, SNTs, and Induction. To the right of the main message, there are two sections: 'REMEMBER:' which states that after orientation approval, users can complete their DISC assessment, and 'KEEP THE MOMENTUM:' which lists four action items with links: 'To start the Leadership Training Day click here', 'To complete your DISC assessment click here', 'To see more upcoming events in your chapter click here', and 'Connect and Engage with other members and leaders in our Communities.' The footer contains the organization's name, contact information (111 N. Magnolia Ave., Suite 1650, Orlando, FL 32801; (201) 222-6544; help@nsls.org), and links to 'Careers at NSLS', 'NSLS Foundation', 'Terms & Conditions', and 'Privacy Policy'.

https://app.nsls.org/members/programs/roi/orientation

THE NATIONAL SOCIETY OF LEADERSHIP AND SUCCESS

DEJANE LATTANY

← Programs

Programs Overview

Foundations of Leadership

Orientation

LTD

Speaker Broadcasts

SNTs

Induction

CONGRATULATIONS!

You've received credit for your **Orientation**

REMEMBER:

Once your Orientation is approved, you can complete your DISC assessment.

KEEP THE MOMENTUM:

- > To start the Leadership Training Day [click here](#)
- > To complete your DISC assessment [click here](#)
- > To see more upcoming events in your chapter [click here](#)
- > Connect and Engage with other members and leaders in our [Communities](#).

THE NATIONAL SOCIETY OF LEADERSHIP AND SUCCESS

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111 N. Magnolia Ave.
Suite 1650
Orlando, FL 32801

(201) 222-6544
help@nsls.org

23KU-GQTJ-DQYC

University of Phoenix

*Upon the recommendation of the Faculty,
University of Phoenix does hereby confer upon*

Dejane R Lattany

the degree of

Bachelor of Science in Health Management

with all the rights, honors and privileges thereunto appertaining.

*In witness whereof, the seal of the University and the signatures as authorized
by the Board of Trustees, University of Phoenix, are hereunto affixed,
this thirty-first day of August, in the year two thousand twenty-three.*


Chairman, Board of Trustees




Christopher M. Lynne
President