

PLEA AGREEMENT

Below is the complete and accurate agreement between the People of the State of Colorado, as represented by the prosecutor, and the above-named Defendant, as represented by his attorney. All concessions and stipulations are fully set forth herein.

1. The Defendant will enter a plea of **GUILTY** to the charge of:

COUNT THREE: MEDICAID FRAUD AND WASTE, 24-31-808(1)(G), (4), C.R.S. (F5) [53651]

2. In exchange for the above guilty plea, The People will dismiss **COUNTS ONE, TWO, AND FOUR**, after the Court accepts the above guilty plea and any agreement(s) of the parties.

3. The People and the Defendant have agreed and stipulated to the following concession(s)

A. (all concessions are set forth herein): Two Years Colorado Department of Corrections Sentence and one year mandatory parole concurrent to sentence in United States District Court- District of Colorado, Criminal case No. 23-CR-00074-NYW. This sentence would be served in the federal prison system. The parties stipulate to Restitution of \$372,150.47 to Colorado Department of Health Care Policy and Financing, c/o Colorado Attorney General's Office, Colorado Medicaid Fraud Control Unit, Ralph L. Carr Colorado Judicial Center, 1300 N. Broadway, Ninth Floor, Denver, CO 80203.

I swear or affirm that I have read and understand this entire document, and every representation I have made is true.


Defendant: DeJane Reaniece Lattany

Date: 5.11.23

As defense counsel, I affirm that the above-named Defendant has executed the foregoing "The Defendant's Request to Plead Guilty (Crim. P. Rule 11 Guilty Plea Advisement)." As defense counsel I have thoroughly reviewed this document with the Defendant in regard to the entry of this guilty plea.


Defense Counsel: Jason Flores-Williams, Reg. No. 49702

Date: 5-18-23

/s/ Daniel T. Brechbuhl
Prosecuting Attorney: Daniel T. Brechbuhl, Reg. No. 31047

Date: 5/1/23