

In The United States District Court
For the District of Colorado

United States of America

Criminal Case NO. 1:23-cr-00074-NYW-1

Vs.

* EMERGENCY

Motion For Injunction pending Appeal/

Dejane Pheaniece Lattany

Motion For Injunctive Relief.

JEFFREY P. COWELL
CLERK

SEP 26 2024

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO

I Dejane Pheaniece Lattany Ask The Court To Grant my Request For Injunctive Relief To Stop My Sentence / Prelease Me From My Sentence / Prelease me to or Convert my Sentence To Home Confinement / Prelease me From my Sentence From the Federal Bureau of Prisons And Place me Back Under the Supervision of the Department of Justice Pre trial Supervision While My 2255 motion (To Vacate my Sentence And my Request To Be Preleased From the Federal Bureau of Prisons And Placed Back Under the Supervision of the Department of Justice Pre Trial Supervision) Is In Progress. I Am Also Asking For the Same Injunctive Relief Stated Above While my Emergency Compassionate Prelease Motion Is In Progress.

I Am Requesting To Be Preleased While the Court Makes A decision on my 2255 motion And/or A decision on my Emergency Motion for Compassionate Prelease. I Would like to Also Notify this Court that In Addition to my 2255 motion Filed in Federal Court, I Have Filed A Rule 35 petition For post Conviction Relief In State Court. Both of the Above Mentioned Motions Argue the Same Evidence that Constitute Clear Instances of Ineffective Assistance of Counsel.

My former Counsel Jason Flores Williams Failed To fulfil His Duties To Me As His Client.

This Urgent Request Is Due to the fact that the Court For my Concurrent State Case 22CR6134 Has Requested And Ordered Another Extension To Respond, to Another 63 days (See exhibit 1).

With the Continuous extensions And Time, It is a Demonstration of Inordinate Delays Along With my 6th, 8th And 14th Amendment Rights Being Violated. I Am Further Experiencing Extreme Hardship That Has Been illustrated in my 2255 motion And my Rule 35 motion For the State 22CR6134 That Is Supposed To Be Run Concurrent To What I am Sentenced By the Federal Court. I Am Considered A "White Collar" Offender And Should Be placed in Custody With Offenders Similar to me in Concern of Security level. Instead, With The Denver Sheriff's Department Requesting the Bureau of Prisons To Launch a Detainer on me (See exhibit 2), I Have Been placed in Custody For At the Least 7 months With Medium And High Security level inmates who Are Violent And Abuse Drugs or who Are Actively Withdrawing Causing me trauma And Health complications. Please Note that I Was Molested By my Uncle who was A Drug Addict And An Alcoholic. I Was Also Abused By A Man in a Previous Relationship who was a Drug Addict (There Are Male inmates housed With us Female inmates). Although The Bureau of Prisons Are Aware that I Am A Minimum Custody/security level inmate, The Bureau of Prisons Has taking the opportunity to Weaponize And Use my Concurrent Sentence to place me in populations of inmates that I Do not Belong With.

I have demonstrated that I am not a flight Risk NOR Am I a danger to the Community By completing Pretrial Release, Probation And self Surrendering with only 48 hours to Find A way TO California - (Victorville prison Camp). While in Bureau of Prisons Custody, I Have developed A CardioVascular AV Block (see exhibit 3) that is progressing. I Was Told By the Discharge Doctor, After Having my Baby on August 6, 2024, that she is Referring me Immediately to the Cardiologist within One week post delivery. The same Doctor stated that my CardioVascular AV-Block is Likely to develop into CardioVascular Myopathy (very Likely) And Discussed putting me on Medication For that. However, Carswell Has Not made Action on this Nor Have they Started A a care plan/treatment plan. I Have Also Been Diagnosed With Severe post partum Depression And Anxiety And They have Prescribed Medication for Mental Health (see exhibit 4). It is Not Worthy to Understand that I Am not A Person who Takes Medication NOR Likes to Feel Altered in Any Way via Medicine or any other Substance. Medication Has Been the Bureau of Prison's Solution For Everything. I Have Been Suffering Panic Attacks And Anxiety Attacks. I Have Also Been Unable to go down to eat Regular Meals in the Prison Nor Have Been Able to Attend Classes And Programs (see exhibit 5) Due to Panics Attacks And Anxiety. I Have Only Been Down to eat Only 3 times Since Ive Been Back to the Institution, from giving Birth, for Over A Month Now.

Everyday, in the Population of Inmates that I Am placed with, There is an Emergency Because the Inmates I Am placed with Are Overdosing, Trying to Commit Suicide And Are Violently Hurting Each other. My Chest pains, Anxiety And Ringing of my Head Has Progressively Gotten Worse. My Father Has Recently Passed Away this year April 2024 And Had Complications With His Heart. Not Only Am I Suffering From the Ineffective Assistance of Counsel, Not Only Am I Suffering Irreparable Damages And Declines in my Health. I Did Not Have A Cardiovascular A/V Block, Panic Attacks, Chest pains Before Coming into Bureau of Prisons Custody. In Combination of All that I have Mentioned is causing me Extreme Mental Anguish. Due to All the Above, my Punishment Has Been Made More Punitive than Needed. I have Asked the Court for my State Case to Review these issues so that I can Be placed in A Safe population or Safe Environment. However, With the State Court's New Extension for Case 22CR6134 (See exhibit 1), I Am Asking that the Court To Consider the Seriousness of Everything I have Mentioned And Presented And Grant This Injunction in An Emergent Manner. My Physical And Mental Health Are At Risk. I Have Demonstrated that I am not A Flight Risk Nor Am I A danger to the Community.

Presented evidence reveals that I Am Likely to Succeed
in the Merits of my 2255 Federal Motion And my
Rule 35 State Motion For Relief. Pleading Guilty to the
State Case And Not Taking the State Case To Trial,
In Order to Run the State Sentence Concurrent With
My Federal Sentence; (Because of False Promises And False
Information And Overall Ineffective Assistance of Counsel
From my former Attorney Jason Flores Williams)

Although I Had/Have Proof that I Did Not Commit
the Charges Against me As they stated, Has Caused
me Severe Hardship. Particularly, Text messages with
the exhibits of my Already Filed Motions 2255 (federal)/rule
35 (state) illustrate that my former Attorney (Jason Flores Williams
was Aware that the State is claiming money that doesn't
Belong to them. (If I Had proceeded in Trial, As I wanted, the
money the State is claiming would Be, And still can Be traced
to the Original Source, which will Be Revealed that the funds Do Not
Belong to Medicaid). In my exhibits, I included the Text
message of my former Attorney showing that I informed
my former Attorney And He (Jason Flores Williams) was Aware
that the State of Colorado Medicaid is claiming funds that
Are Not theirs. In my former Attorney's Response to me,
He stated Not to worry And that "we" him and I would
Use it Against the State (The Fact that I Have Been
Falsely/Wrongly Accused And Charged And they Are claiming
Funds that Are Not theirs).

Instead, He Coerced me to Sign the Guilty plea Agreement For the State While in Contrast, I Wanted to Take the State Case to Trial. My former Attorney Argued With me that He knows What He is Doing in front of my Grandmother And my Children's Father on Speaker phone, Demanding And placing me Under Fear And Duress that I Am to Listen And Do As He Says (By Signing the Plea Agreement for the State And Running the Sentence Concurrent With my federal Sentence While promising that my Federal Sentencing And Sentence Would Not At All Be Affected). In Contrast to What I Was Made to do, I Wanted to Take the State Case 22CB6134 to Trial. Additionally, In the Signed Plea Agreement For the State of Colorado, my former Attorney Did not Allow me to Pread it For my self, Hence Why the initials (DL) Where I Was Supposed to Pread And Agree, Are Not Written By Me. Everything Was Initialed By my former Attorney. Jason Flores Williams initialed For me And Said He Would Explain Later (He Never explained). My former Attorney Also Had me Sign my Signature For 1 year probation For the State of Colorado (See exhibit X), However, the Judgement And Commitment that I Later Received on my Own (While in prison) states 2 years Probation (further illustrating Ineffective Assistance of counsel). I Was Not Informed By Counsel of the Court. I Was Only informed When I Asked For a Copy of my Judgement And Commitment When I Was Forced to Leave Victorville Camp And Transferred to a HighPrise Facility (for Medium And High security Level offenders).

Not Only Am I Suffering A Two point Federal Conviction (Because of my Former Attorney's errors and Deficiencies in Representation), I have And Am Currently Suffering Being Placed With high And Medium Security level Inmates Who Are Violent And Abuse Drugs. I Am Also Suffering From Trauma, Anxiety, PTSD, Severe post partum Depression, Chest pains (Frequently), Mental Anguish And A Newly Developed Cardiovascular AV Block (Developed While in Bureau of Prison's Custody). Because I Will Likely Succeed in the Merits Presented in my Petition For Post Conviction Relief; I Am Suffering Irreparable Harms/Damages in concern of my Mental/physical Health And Well Being, And I Am Not a Flight Risk Nor Am I a public Safety Concern, I Am Asking the Court To Take Serious Consideration of Everything that I Have Presented And Grant this injunction (Stopping my Sentence/Precluding me From my Sentence While the Court Makes a Decision on my Petition for Companionate Release At Post Conviction Relief) In An Emergent Manner.

Thank you for your Attention to this matter, And I trust that the Court Will Carefully Consider the Gravity of my Situation in Rendering it's Decision.

There is Also A "sliding scale" Variant of the Winter Standard see *Fraihat v. U.S. Immgr & Customs Enf't*, 16 F 4th 613, 635 (9th Cir 2021). Under the Variation, a Preliminary injunction may Also issue Relief When there Are Serious Questions going to the Merits And Balance of Hardships that tips sharply towards the plaintiff "So Long As the plaintiff Also shows there is a likely hood of irreparable injury And that the injunction is in the public interest"

"Id (quoting *Alliance For the Wild Rockies v. Cottrell*, 652 F 3d 1127, 1135 (9th Cir 2011)

See *Winter v. Natural Res. Def Council, Inc*, 555 U.S. 7, 20, 129 S. Ct 365, 172 L Ed 2d 249 (2008)

I Am Asking the Court to Consider the Factors And that I meet the Following Burdens: I Am Likely to succeed on the merits of my 2255 motion and state appeal, I Am Likely to Suffer irreparable Harms in the Absence of preliminary Relief in Regard to my Health and well being, The Balance Equates in my favor And the injunction is in the public Interest (I am not a Flight Risk Nor a Danger to the Community).

Thank you,

Dejane Peaniece Lattany

Bureau of Prisons Registration Number: 51090-510



Exhibit Z

Recent medical Records

**Bureau of Prisons
Health Services**

Clinical Encounter - Administrative Note

Inmate Name:	LATTANY, DEJANE REANIECE	Reg #:	51090-510
Date of Birth:	06/30/1990	Sex:	F Race: BLACK
Note Date:	09/05/2024 08:11	Provider:	Shackelford, Janet
		Facility:	CRW
		Unit:	F01

Reviewed Health Status: No

Admin Note - Orders encounter performed at Health Services.

Administrative Notes:

ADMINISTRATIVE NOTE 1 Provider: Shackelford, Janet (MOUD) M.D.

34 y/o female per MFM at
risk for post partum cardiomyopathy. ←
EKG with HR 49/min. She has been in 50's before.
Is pending PP echo and cardiology f/u. ←
No symptoms at the time.
Also order CXR and holter monitor. ←

New Radiology Request Orders:

<u>Details</u>	<u>Frequency</u>	<u>End Date</u>	<u>Due Date</u>	<u>Priority</u>
General Radiology-Chest-PA/Lateral	One Time		09/06/2024	Routine

Specific reason(s) for request (Complaints and findings):

34 y/o female post partum with bradycardia.
at risk for post partum cardiomyopathy. ←

New Consultation Requests:

<u>Consultation/Procedure</u>	<u>Target Date</u>	<u>Scheduled Target Date</u>	<u>Priority</u>	<u>Translator</u>	<u>Language</u>
Respiratory Therapy	10/04/2024	10/04/2024	Urgent	No	

Subtype:

pulmonary function staff

Reason for Request:

48 hour holter monitor ←

34 y/o female possible h/o 1st degree block, heart murmur
and atypical chest pain. ←

Post partum episodes of bradycardia noted.
pending cardiology consult and repeat echo. ←

Provisional Diagnosis:

Post partum
with intermittent bradycardia. ←

Cardiology	09/27/2024	09/27/2024	Urgent	No
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Subtype:

Onsite Cardiology ←

Reason for Request:

34 y/o female
Due to h/o 1 st degree AV block at increased
risk of post partum cardiomyopathy. ←
s/p vaginal delivery 8/3/2024.
f/u EKG showing bradycardia 49/min ←

JPS OB MD requesting f/u visit with cardiology post partum. ←
Seen 8/22/2024, no cardiac symptoms noted.
As of this date post partum blood pressures normal.

Inmate Name: LATTANY, DEJANE REANIECE

Date of Birth: 06/30/1990

Encounter Date: 09/04/2024 07:41

Sex: F Race: BLACK

Provider: Allison, C. (MOUD) MD,

Reg #: 51090-510

Facility: CRW

Unit: F01

Allergies:AllergyReactionComments

No Known Allergies

Allergies list reviewed/updated for the presence or absence of allergies, sensitivities, and other reactions to drugs, materials, food and environmental factors with the patient on 09/04/2024 07:41 by Allison, C. (MOUD) MD, Chief Psychiatrist

Seen for clinic(s): Mental Health ←

Added to clinic(s): Mental Health

OBJECTIVE:Comments

Mental Status Exam:

General: Aware and alert

Appearance: Appropriate grooming, hygiene; appropriate eye contact.

Attitude: Cooperative; engaged

Activity: no abnormal involuntary movements.

Mood: depressed with anxious affect ←

Speech: regular rate and rhythm.

Thought Process: Linear, logical, goal-directed

Thought Content: No delusions.

Safety: Denied suicidal ideation, plan and intent. Denied homicidal ideation, plan and intent. Future oriented for short/long-term events.

Perception: No AVH; Not RTIS.

Attention/concentration: Intact

Orientation: to person, place, situation

Memory: short/long term intact

Insight/Judgement: Intact/intact.

ASSESSMENT:Major Depressive Disorder: Single Episode: Severe, F32.2 - Current - *with anxious distress*

Unspecified Trauma- And Stressor-Related Disorder, F43.9 - Current

PLAN:**New Medication Orders:**

<u>Rx#</u>	<u>Medication</u>	<u>Order Date</u>
	Sertraline Tablet	09/04/2024 07:41
	<u>Prescriber Order:</u> 25 mg Orally - daily x 180 day(s) -- 25 mg x14 days, then 50 mg daily	
→	Indication: Major Depressive Disorder: Single Episode: Severe, Unspecified Trauma- And Stressor-Related Disorder	

Schedule:ActivityDate ScheduledScheduled Provider

Chronic Care Visit

12/03/2024 00:00

Psychiatrist 1

Follow up

Other:**Assessment:**

DEJANE LATTANY is a 34AIC MHCL-2 with PPH of postpartum depression. Current symptoms consistent with MDE with anxious distress in addition to PTSD type symptoms though criteria not completely met. Will start SSRI to target depression, anxiety and trauma. No imminent risk at this time and no current SI.

**Bureau of Prisons
Health Services
Clinical Encounter - Administrative Note**

Inmate Name: LATTANY, DEJANE REANIECE	Reg #: 51090-510
Date of Birth: 06/30/1990	Sex: F Race: BLACK
Note Date: 08/28/2024 12:26	Facility: CRW
	Unit: F01

Reviewed Health Status: No

Review Note - Consultation Report Review encounter performed at Health Services.

Administrative Notes:

ADMINISTRATIVE NOTE 1 Provider: Shackelford, Janet (MOUD) M.D.

Seen by JPS OB post partum.

Due to h/o 1 st degree AV block at increased
risk of post partum cardiomyopathy. ←

They request a cardiology f/u.

New Radiology Request Orders:

<u>Details</u>	<u>Frequency</u>	<u>End Date</u>	<u>Due Date</u>	<u>Priority</u>
Ultrasound-Echo-General	One Time		09/27/2024	Routine

Specific reason(s) for request (Complaints and findings):

34 y/o female

h/o Due to h/o 1 st degree AV block at increased
risk of post partum cardiomyopathy.
vaginal delivery 8/3/2024.

New Consultation Requests:

<u>Consultation/Procedure</u>	<u>Target Date</u>	<u>Scheduled Target Date</u>	<u>Priority</u>	<u>Translator</u>	<u>Language</u>
Cardiology	11/28/2024	11/28/2024	Routine	No	

Subtype:

Onsite Cardiology

Reason for Request:

34 y/o female

Due to h/o 1 st degree AV block at increased
risk of post partum cardiomyopathy. ←
s/p vaginal delivery 8/3/2024.

JPS OB MD requesting f/u visit with cardiology post partum.

Seen 8/22/2024, no cardiac symptoms noted.

As of this date post partum blood pressures normal.

EKG and echo ordered. ←

Provisional Diagnosis:

h/o 1st degree AV block at risk post partum of cardiomyopathy ←

New Non-Medication Orders:

<u>Order</u>	<u>Frequency</u>	<u>Duration</u>	<u>Details</u>	<u>Ordered By</u>
EKG	One Time			Shackelford, Janet (MOUD) M.D.

Order Date: 08/28/2024

Copay Required: No

Cosign Required: No

Telephone/Verbal Order: No

Completed by Shackelford, Janet (MOUD) M.D. on 08/28/2024 12:31

**Bureau of Prisons
Health Services
Clinical Encounter**

Inmate Name: LATTANY, DEJANE REANIECE
Date of Birth: 06/30/1990
Encounter Date: 09/04/2024 07:41

Sex: F Race: BLACK
Provider: Allison, C. (MOUD) MD,

Reg #: 51090-510
Facility: CRW
Unit: F01

Reviewed Health Status: Yes

Chronic Care - Chronic Care Clinic encounter performed at Health Services.

SUBJECTIVE:

COMPLAINT 1 Provider: Allison, C. (MOUD) MD, Chief

Chief Complaint: MENTAL HEALTH

Subjective: HPI:

DEJANE LATTANY is a 34AIC MHCL-2 with PPH of postpartum depression who is seen for consultation. She was recently seen by Dr. Reynolds who told me "She presented with depressive symptoms such as loss of interest, not eating, anxiety and fatigue, was unable to stop crying during the session and looked like she has been crying for some times now. She did report some passive suicidal thoughts in the recent past, but no intent or plan at this time. She also reported history of post-partum depressing after birth of her older children." Care level was increased at that time. Today, she reported depressive symptoms starting in 2020 after the birth of her child.

She had constant tearfulness, social withdrawal, hypersomnia, hyperphagia. She saw a psychiatrist but refused medication. Symptoms persisted until her last birth last month. Since, she had more pronounced feelings of sadness, anhedonia on top of middle and terminal insomnia, fatigue, decreased appetite, and thoughts of suicide. She started to have feelings of panic with chest palpitations. She avoids others related to distrust of them and heightened anxiety. She in part related this to a historical trauma from her BF beating her while on drugs. She added a childhood experience of molestation. As a result, she reported nightmares and intrusive thoughts about the events. Here, she is unable to distract herself from the thoughts or avoid the people who bring the intrusions. As a results, her mood has been more labile. She denied current SI and HI. She denied symptoms consistent with mania, AVH, delusions.

Pain: Not Applicable

COMPLAINT 2 Provider: Allison, C. (MOUD) MD, Chief

Chief Complaint: MENTAL HEALTH

Subjective: Past Psych Hx: postpartum depression

Psych Hospitalizations: denied

Medication trials: none

Suicide/Homicide attempts: denied

NSSI: denied

Substance Abuse Hx: cannabis use and alcohol use each once at age 17.

Allergies: Denied

Medical Hx: follow-up cardiology for borderline first degree block

Surgical Hx: denied

Abuse Hx: molested by uncle at age 8, physically abused by BF

Social Hx: Denver, CO; Four children with significant other there in addition to M, GM, Sisters

Criminal Hx: 48-month sentence

Family Psych Hx.: not known

Family Medical Hx: F: passed of MI; DM/CA on father's side; MGM-unknown AI condition

Pain: Not Applicable

**Bureau of Prisons
Health Services
Clinical Encounter**

Inmate Name: LATTANY, DEJANE REANIECE
Date of Birth: 06/30/1990
Encounter Date: 08/23/2024 10:29

Sex: F Race: BLACK
Provider: Smith, S. APRN

Reg #: 51090-510
Facility: CRW
Unit: F01

Reviewed Health Status: Yes

Mid Level Provider - Evaluation encounter performed at Health Services.

SUBJECTIVE:

COMPLAINT 1 Provider: Smith, S. APRN

Chief Complaint: OB/GYN

Subjective: I thought my appointment yesterday was for my heart, I only saw someone from post-partum care. I am feeling depressed, no thoughts of suicidal/homicidal ideations

34 y/o G7 P4 (vaginal) s/p vaginal delivery on 8/3/2024

OB Hx:

1/2012 40 weeks 24 hr labor, 7 lb 13 oz, Male, vaginal Epidural, pre-eclampsia during delivery, not induced

5/2016 38 weeks 8 hr labor, 8lb 10 oz female, vaginal, Epidural, induced to avoid pre eclampsia

1/2022 38 weeks 1 hr labor 7 lb 15 oz male, vaginal, induced, inc BP and fetal tracing abnormal

8/2024 - term vaginal delivery

PMH:

--heart murmur, not told had heart defect, EKG borderline 1st degree block, chest pains earlier in pregnancy but were sharp and associated with anxiety

--Lower back pains after Epidurals, given maternity belt now

--Post partum depression, didn't need medications

PSH: none

Social, smoker short time when 17 y/o, No alcohol or illegal drugs

Allergies: none

Plan: Sent email to psychology/psychiatry services. Follow up on yesterday was not with cardio, she needs f/u with cardiologist. Trip desk/UNT notified via email

Pain: No

Allergies:

Allergy

Reaction

Comments

No Known Allergies

Allergies list reviewed/updated for the presence or absence of allergies, sensitivities, and other reactions to drugs, materials, food and environmental factors with the patient on 08/23/2024 10:29 by Smith, S. APRN

OBJECTIVE:

Temperature:

<u>Date</u>	<u>Time</u>	<u>Fahrenheit</u>	<u>Celsius</u>	<u>Location</u>	<u>Provider</u>
08/23/2024	10:12 CRW	98.6	37.0	Temporal	Palomares, Ana Medical Assistant

**Bureau of Prisons
Health Services
Clinical Encounter**

Inmate Name: LATTANY, DEJANE REANIECE
Date of Birth: 06/30/1990
Encounter Date: 07/16/2024 11:20

Sex: F Race: BLACK
Provider: Shackelford, Janet

Reg #: 51090-510
Facility: CRW
Unit: F01

Reviewed Health Status: Yes

Obstetric - OB Follow-up encounter performed at Health Services.

SUBJECTIVE:

COMPLAINT 1 Provider: Shackelford, Janet (MOUD) M.D.

Chief Complaint: OB/GYN

Subjective: 33 y/o G7 P3033 (vaginal) menses irregular, LMP 9/26/23, EDD 7/3/2024

U/S OB, 1/5/2024 9 6/7 EDD 8/3/2024 (use as EDD)

U/S OB, 17 3/7 EDD 7/27/24, Final EDD that will be used 8/3/2024

7/1/2024 declined MFM consult.

OB Hx:

1/2012 40 weeks 24 hr labor, 7 lb 13 oz, Male, vaginal Epidural, pre-eclampsia during delivery, not induced

5/2016 38 weeks 8 hr labor, 8lb 10 oz female, vaginal, Epidural, induced to avoid pre eclampsia

1/2022 38 weeks 1 hr labor 7 lb 15 oz male, vaginal, induced, inc BP and fetal tracing abnormal

PMH:

--heart murmur, not told had heart defect, EKG borderline 1st degree block, chest pains earlier in pregnancy but were sharp and associated with anxiety, echo 5/2024 mild regurg and if echo mild no cardiology f/u needed. ←

--Lower back pains after Epidurals, given maternity belt now

--Post partum depression, didn't need medications

PSH: none

Social, smoker short time when 17 y/o, No alcohol or illegal drugs

Allergies: none

Normal 1-hour GTT

H/H (5/2024) 8.5/26 (states she is taking Fe every three days) on Fe TID qod

Labs (6/17/24) and (6/26/24) declined.

GBS (7/9/2024) negative

Pain: No

COMPLAINT 2 Provider: Shackelford, Janet (MOUD) M.D.

Chief Complaint: OB/GYN

Subjective: 7/16/2024

37 3/7 weeks FH 38 cm VTx, FHT 128, urine N/A. declined cervix exam.

Good FM no complaints. Patient states no show today as didn't see MD2 on call out.

Reinforced to check call out carefully and will be on call out every Tuesday 7:30 am until delivery. REcommended induction at 39 weeks to balance prematurity with risk of pre eclampsia

and low platelets. Advised labs now but declines. Patient agrees to induction at 40 weeks.

Reviewed Sx of pre eclampsia and low platelets to tell NCC nursing immediately.

Advise 2x week fetal monitoring and to come back after lunch for NST and will get NST and biophysical

**Bureau of Prisons
Health Services
Clinical Encounter - Administrative Note**

Inmate Name:	LATTANY, DEJANE REANIECE	Reg #:	51090-510
Date of Birth:	06/30/1990	Sex:	F Race: BLACK
Note Date:	08/23/2024 06:36	Provider:	Smith, S. APRN
		Facility:	CRW
		Unit:	F01

Reviewed Health Status: No

Cosign Note - Chart Review encounter performed at Health Services.

Administrative Notes:

ADMINISTRATIVE NOTE 1 Provider: Smith, S. APRN

return from post-partum follow up

Follow up appointment was supposed to be for Cardiomyopathy due to hx of 1st degree AV Block, no mention of this on paperwork that was received ←

T. Grunden RN will email Carswell medical coordinator regarding follow up plan per the note that was received

Patient will be called to OPC for evaluation

Temperature:

<u>Date</u>	<u>Time</u>	<u>Fahrenheit</u>	<u>Celsius</u>	<u>Location</u>	<u>Provider</u>
08/22/2024	15:10	CRW	97.7	36.5	Downing, Bryan RN

Pulse:

<u>Date</u>	<u>Time</u>	<u>Rate Per Minute</u>	<u>Location</u>	<u>Rhythm</u>	<u>Provider</u>
08/22/2024	15:10	CRW	60		Downing, Bryan RN

Respirations:

<u>Date</u>	<u>Time</u>	<u>Rate Per Minute</u>	<u>Provider</u>
08/22/2024	15:10	CRW	16 Downing, Bryan RN

Blood Pressure:

<u>Date</u>	<u>Time</u>	<u>Value</u>	<u>Location</u>	<u>Position</u>	<u>Cuff Size</u>	<u>Provider</u>
08/22/2024	15:10	CRW	124/81			Downing, Bryan RN

SaO2:

<u>Date</u>	<u>Time</u>	<u>Value(%)</u>	<u>Air</u>	<u>Provider</u>
08/22/2024	15:10	CRW	97 Room Air	Downing, Bryan RN

Copay Required: No

Cosign Required: No

Telephone/Verbal Order: No

Completed by Smith, S. APRN on 08/23/2024 06:46

**Bureau of Prisons
Health Services
Inmate Writ/Detainer**

Reg #: 51090-510

Inmate Name: LATTANY, DEJANE REANIECE

SENSITIVE BUT UNCLASSIFIED – This information is confidential and must be appropriately safeguarded.

TB Clearance: Yes

Last PPD Date: 12/02/2023

Induration: 0mm

Last Chest X-Ray Date:

Results:

TB Treatment:

Sx free for 30 days: Yes

TB Follow-up Recommended: No

Transfer To:

Transfer Date: 01/31/2024

Health Problems

<u>Health Problem</u>	<u>Status</u>
Anemia, unspecified In pregnancy	Current
Obesity BMI= 41	Current
Cardiac arrhythmia Borderline First degree AV block in Pregnancy. ←	Current
Cracked tooth Fractured tooth no decay. Missing distal adjacent teeth.	Current
Open restoration margins of tooth Tooth #19, presented with distal missing margin of the composite restoration.	Current
Low back pain, UNS	Current
Pain in unspecified foot Bilateral- chronic	Current
Amenorrhea, unspecified	Current
Encounter for supervision of normal pregnancy EDD by ultrasound= 08/07/2024. LMP= 09/26/2023. EDD by LMP= 07/02/2024.	Current
Encntr for suprvsn of normal preg, unsp, first trimester Positive POC urine preg test/HCG, TOTAL, QN. LMP= 09/26/2023. EDD by LMP= 07/02/2024	Current
Nausea Pregnancy associated- Improved with Pyridoxine	Remission

Medications: All medications to be continued until evaluated by a physician unless otherwise indicated. Bolded drugs required for transport.

Ferrous SULFATE 325MG Tab Exp: 07/21/2024 SIG: Take one tablet by mouth each day

Prenatal Oral Tablet 27-0.8 MG Exp: 07/21/2024 SIG: Take one tablet by mouth daily

Pyridoxine HCl 50 MG Tab Exp: 02/22/2024 SIG: Take half tablet (25 mg) by mouth twice daily AS NEEDED

OTCs: Listing of all known OTCs this inmate is currently taking.

Acetaminophen 325 MG Tab

Pending Appointments:

<u>Date</u>	<u>Time</u>	<u>Activity</u>	<u>Provider</u>
01/26/2024	00:00	MLP Chronic Care Follow up	MLP 06
12/02/2024	00:00	PPD Administration	Nurse
12/30/2024	00:00	MLP Chronic Care Follow up	MLP 06
01/22/2025	00:00	Chronic Care Visit	Physician 03

Non-Medication Orders:

<u>Order Name</u>	<u>Status</u>	<u>Frequency</u>	<u>Duration</u>	<u>Order Date</u>	<u>Details</u>
Blood Pressure	Pending	Every Tues and Thurs	180 days	01/30/2024	

**Bureau of Prisons
Health Services
Clinical Encounter - Administrative Note**

Inmate Name:	LATTANY, DEJANE REANIECE	Reg #:	51090-510	
Date of Birth:	06/30/1990	Sex:	F	
Note Date:	08/29/2024 06:55	Race:	BLACK	
	Provider:	Smith, S. APRN	Facility:	CRW
			Unit:	F01

Reviewed Health Status: No

Admin Note - Chart Review encounter performed at Health Services.

Administrative Notes:

ADMINISTRATIVE NOTE 1 Provider: Smith, S. APRN

To write consult for onsite cardiology



Other:

consult placed by Md

Copay Required: No

Cosign Required: No

Telephone/Verbal Order: No

Completed by Smith, S. APRN on 08/29/2024 06:56

Inmate Name:	LATTANY, DEJANE REANIECE	Reg #:	51090-510
Date of Birth:	06/30/1990	Sex:	F Race:BLACK
Note Date:	09/05/2024 08:11	Provider:	Shackelford, Janet
		Facility:	CRW
		Unit:	F01

Holter, CXR and echo ordered.

Provisional Diagnosis:

Possible h/o 1st degree block now intermittent bradycardia ←
Post partum, at risk for post partum cardiomyopathy

Discontinued Consultation Requests:

<u>Consultation/Procedure</u>	<u>Target Date</u>	<u>Scheduled Target Date</u>	<u>Priority</u>	<u>Translator</u>	<u>Language</u>
Cardiology	11/28/2024	11/28/2024	Routine	No	

Subtype:

Onsite Cardiology

Reason for Request:

34 y/o female
Due to h/o 1 st degree AV block at increased ←
risk of post partum cardiomyopathy.
s/p vaginal delivery 8/3/2024.

JPS OB MD requesting f/u visit with cardiology post partum. ←
Seen 8/22/2024, no cardiac symptoms noted.
As of this date post partum blood pressures normal.
EKG and echo ordered.

Provisional Diagnosis:

h/o 1st degree AV block at risk post partum of cardiomyopathy

New Non-Medication Orders:

<u>Order</u>	<u>Frequency</u>	<u>Duration</u>	<u>Details</u>	<u>Ordered By</u>
Vitals	Every Tues and Thurs	30 days	check blood pressure notify staff if > 139/89 and heart rate < 55 min.	Shackelford, Janet (MOUD) M.D.

Order Date: 09/05/2024

Copay Required: No

Cosign Required: No

Telephone/Verbal Order: No

Completed by Shackelford, Janet (MOUD) M.D. on 09/05/2024 08:31

Requested to be reviewed by Bollinger, Timothy (MOUD) DO.

Review documentation will be displayed on the following page.

EXHIBIT prior to Death of
AIC Scherry Moses who passed
Away from a heart Attack
After going to medical staff
And psychology multiple times
(The same way I am Doing)

Remembering the Life of Scherry Moses 1967-2024

*Ms. Moses is from San Antonio, Texas. She joined R.D.A.R in
February 2024, wanting to leave Farswell sober to reunite with her family.
She is preceded in death by her son. She leaves four children.*

Welcome

Ms. Matthews

Scripture Reading - John 14:1-3

Ms. Barker

Song - Amazing Grace

Poem

Ms. Charles

Remembrances

All are invited to share special memories of Ms. Moses

Song - The Storm

Closing Prayer

Exhibit 1

District Court, City and County of Denver, Colorado Lindsey-Flanigan Courthouse, Room 135 520 West Colfax Avenue Denver, CO 80204	DATE FILED August 26, 2024
THE PEOPLE OF THE STATE OF COLORADO, Plaintiff	▲ COURT USE ONLY ▲
v.	
DEJANE REANIECE LATTANY, Defendant	Division Courtroom: 5G
NOTICE OF EXTENSION	

This matter comes before the Court on Defendant's *Petition for Postconviction Relief Pursuant to Crim. P. 35(c)* filed on April 23, 2024. Pursuant to Crim P. 35(c)(3)(IV), the Court hereby notifies the parties that it extends the deadline for its response to 63 days from the date of this Order.

Dated: August 26, 2024

BY THE COURT:

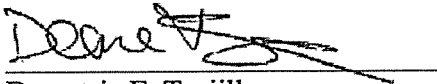

Demetria E. Trujillo
District Court Judge

Exhibit 2-B

TRULINCS 51090510 - LATTANY, DEJANE REANIECE - Unit: CRW-F-A

FROM: Lattany, J
TO: 51090510
SUBJECT: Response from 5G clerk
DATE: 05/17/2024 10:36:03 PM

02courtroom5g@judicial.state.co.us

Me:
Goodmorning Chad,

Please inform the honorable judge of the following in regards to the 35(c) and (a) .

Matt Spivey with the Public Defenders office informed me to request legal counsel for DeJane through the 35(c) petition.

This is because the BOP is not adhering to the Judgement and Conviction Sentencing that was agreed upon.

Also Victorville Federal camp has placed a detainer on DeJane Lattany stating she has a warrent out of Denver through Denver Sheriff's Department for this case and this is preventing her from entering the Mint Program that she is accepted to because she is 7 months pregnant.

We are asking the honorable judge to please assign DeJane Lattany counsel to assist with having this detainer removed so she can at least make it to the MINT Program before delivering her baby while waiting on a decision to made in regards to her ineffective counsel.

Thank you so much for your,

5G
Good afternoon,

The Court is aware of Ms. Lattany's request and will issue an order in due course.

Thank you,

Chad Nelsen (he/him)

Law Clerk to the Hon. Demetria Trujillo

2nd Judicial District - Denver District Court - Courtroom 5G

520 W Colfax Ave, Denver, CO 80204 | P: 303-606-2775

Exhibit 2



**SHERIFF
DEPARTMENT**
DENVER PUBLIC SAFETY

Denver Sheriff Department
Downtown Division Civil Unit

201 W. Colfax Avenue
Denver, CO 80202
p: 720-865-9556
f: 720-865-9590

www.denvergov.org/sheriff

January 31, 2024

FCC Victorville
Attn: A Hatt
P.O. Box 5400
Adelanto, CA 92301

RE: LATTANY, DEJANE R. DOB: 6/30/1990
Denver District Case No.: 22CR6134
BOP # 51090-510

To Whom It May Concern:

We have been informed that DeJane Lattany is in your custody. This letter will serve as our lodging of a detainer against her for charges in Denver District Court.

Enclosed please find a copy of the court mittimus, to be lodged as a detainer for DeJane Lattany. Court mittimus issued by the Honorable Judge Christine Antoun, Denver District Court, Denver Colorado.

DeJane Lattany is a Black female, 5'6" tall, 199 lbs., brown hair, brown eyes,
DOB: 6/30/1990 SSN: unknown

We are requesting that you lodge our court mittimus as a detainer for this department and advise the subject of same.

Should you have any questions with regards to this request, please contact Disa Gibbens of the Denver Sheriff's Office Fugitive Warrants & Extradition Unit at (720) 865-8701.
Disa.Gibbens@denvergov.org.

Thank you for your cooperation in this matter.

Sincerely,

Sheriff Elias Diggins.

cc: Jessica Negrete, District Attorney's Office
Enclosure

FOR CITY SERVICES VISIT | CALL
DenverGov.org | 311

The Bop is 51090-510
2/1/24 10:00 AM
2/1/24 10:00 AM
2/1/24 10:00 AM

Exhibit 2

RID:D. 52022CR006134-000044

District Court, Denver County, State of Colorado

Case#:D0162022CR006134 Div/Room: 5G

JUDGMENT OF CONVICTION, SENTENCE Amended

The People of the State of Colorado vs. LATTANY, DEJANE REANIECE
DOB 6/30/1990

The Defendant was sentenced on: 5/22/2023

People represented by...: BRECHBUHL, DANIEL

Defendant represented by: FLORES-WILLIAMS, JASON

UPON DEFENDANT'S CONVICTION this date of: 5/22/2023

The defendant pled guilty to:

Count # 3 Charge: MEDICAID-ALTER/FALSE/CONCEAL RECORD

C.R.S # 24-31-808(1)(g), (4)

Class: F5

Date of offense(s): 11/09/2019 to 2/17/2021 Date of plea(s): 5/22/2023

IT IS THE JUDGMENT/SENTENCE OF THIS COURT that the defendant be sentenced to
THE CUSTODY OF THE EXECUTIVE DIRECTOR OF THE DEPARTMENT OF CORRECTIONS

Department of Corrections 2.00 YEARS COUNT 3
5/22/23: 2 YEARS PAROLE. DEF'S SENTENCE IS TO BE SERVED CONCURRENTLY TO DEF'S
SENTENCE IN FEDERAL CASE 23-CR-74-NYW. DEF'S SENTENCE IS TO BE SERVED IN THE
BUREAU OF PRISONS.

STAY OF EXECUTION IS GRANTED UNTIL 8/29/23 AT 1 P.M.

/MSA

09/06/2023 - STAY OF EXECUTION IS EXTENDED UNTIL 09/28/2023 AT 12:00 PM. /AKB

STAY OF EXECUTION GRANTED TO: 9/28/2023 @ 12:00 P

Plus a mandatory period of parole as required by statute.

Months on parole 0024

	Assessed		Balance
\$	377,172.47	\$	377,172.47

THEREFORE, IT IS ORDERED the Sheriff of Denver County shall convey the
DEFENDANT to the following department TO BE RECEIVED AND KEPT ACCORDING TO LAW
COLORADO STATE DEPARTMENT OF CORRECTIONS DIAGNOSTIC CENTER

ADDITIONAL REQUIREMENTS

JUDGMENT OF CONVICTION IS NOW ENTERED, IT IS FURTHER ORDERED OR RECOMMENDED:

DATE 9/7/23 NPT 5/22/23 JUDGE/MAGISTRATE Christine Catherine Antoun
CHRISTINE CATHERINE ANTOUN

Sheriff's Certificate of Completion

The court orders the sheriff to complete this certificate and return to the
clerk of court upon the release of the defendant from their custody.

I certify that I executed this order as directed and released the defendant
on _____ (Date).

Date _____

Sheriff _____

By Deputy _____

EXHIBIT 2

of 48

CRWDG 540*23 *
PAGE 003 OF 003 *

SENTENCE MONITORING
COMPUTATION DATA
AS OF 05-15-2024

* 05-15-2024
* 07:37:06

REGNO...: 51090-510 NAME: LATTANY, DEJANE REANIECE

----- CURRENT DETAINERS: -----

DETAINER NO...: 001
DATE LODGED...: 01-31-2024
JURISDICTION.: STATE OF COLORADO
AUTHORITY....: COLORADO DOC/ DENVER COUNTY SHEIRFF DEPT
CHARGES.....: INMATE OWES SENTENCE IN CASE NUMBER 22CR6134 TO THE DOC AND IT
NOT EXPIRE UNTIL 09-28-27

G0000 TRANSACTION SUCCESSFULLY COMPLETED

DOCUMENTATION OF INFORMAL RESOLUTION ATTEMPT

Bureau of Prisons Program Statement No. 13360.16, Administrative Remedy Program, (December 31, 2007), requires, in most cases, that inmates attempt informal resolution of grievances prior to filing a formal written complaint. This form shall be used to document your efforts towards informally resolving your grievance.

Inmate Name LATHAN, Detane Register Number 51090-510

1. Briefly state your complaint. Include all details and facts which support your request and the date on which the basis for the complaint occurred. Regional provided A.W. Mr. Hess with the paperwork and instructions to justify the "Detainer". However, the paperwork states to "Detain" me based off of the attached mittimus for my 2 year sentence that the state imposed. There is no paperwork stating that I am to be detained past my 2 year sentence. How are you able to detain me past the legal sentence without an order or paperwork justifying it?

2. Briefly state the action you request to resolve your complaint.
I am requesting that you refer to the legal paperwork justifying the detainer for my two year concurrent sentence and fix the date. I started serving my 2 year state sentence in 2023, therefore it ends in 2025, or produce legal paperwork from the state of Colorado that gives you the right to detain me past my legal state sentence.

3. Briefly state the action(s) you have taken and with whom you have spoken to resolve your complaint.
I spoke with Regional along with Mr. Hess to get the paperwork sent here to justify detainer. I went to Open House to Ms. Mallard. I explained that the date matters because you are detaining me until 2021 illegally from a verbal phone call that contradicts the paperwork sent to the BOP. I am now going to hold you legally responsible for your failure to act.

TO BE COMPLETED BY STAFF

Date Received by Counselor for Response 6.26.24

Summary of investigation (place response on this form):

What actions were taken to resolve this matter informally (place response on this form):

Explain reasons for no resolution (place response on this form):

3. Time Issued BP 8.5 6.26.24

Unit Team Member: Mphite

4. Time Inmate Returned BP 8.5 7.17.24

Unit Team Member: Mphite

Time Investigation on BP 8.5 Completed and BP-9 (BP229(13)) issued: _____

Manager/Camp Administrator Signature: _____

_____, (date), this issue was informally resolved.

Signature _____

Date _____

on: (1) If complaint is informally resolved, forward the original, signed and dated by the inmate to the Unit Counselor for filing. (2) If is NOT informally resolved, for the original (attached to BP-9 form) to the BP-9 Coordinator's box in the Warden's Office

Response from Records
at Carlswell FMZ
of 48 Exhibit 2

Victorville placed a Detainer on I/M Lattany #51090-510 in Sentry on January 31, 2024. This inmate has a concurrent sentence running with Colorado Department of Corrections/Denver County Sheriff Department for case number 22CR6134. According to the information entered in Sentry by Victorville staff, the inmate still owes time with Colorado on her State sentence. According to the inmate herself she has a 2-year sentence running with Colorado. According to her the sentence is running concurrent to her federal sentence. Therefore, no one at this institution can legally remove the Detainer until Colorado DOC/Denver Sheriff sends us paperwork stating her time is finished with them and that they would like their Detainer to be removed. We have requested her file from Victorville, and we are currently waiting to receive it.

Email to Former Counsel

of 48

Attorney

Jason

Flores

Williams

TRULINCS 51090510 - LATTANY, DEJANE REANIECE - Unit: LOS-G-S

FROM: Lattany, J
TO: 51090510
SUBJECT: This is letter Holli sent to Jason
DATE: 02/09/2024 09:51:04 PM

From: Forwarded message Holli Coulman-----<holli.coulman@gmail.com> Date: Wed, Feb 7, 2024 at 1:43 PM Subject:
Urgent: Client DeJane Reaniece Lattany Moved to Federal Detention Center Los Angeles To: <jfw@jfwlaw.net>

Dear Mr. Jason FloresWilliams, I am writing to inform you of an urgent matter regarding your client, DeJane Reaniece Lattany. Ms. Lattany has recently been transferred from Victorville Federal Women's Camp to Federal Detention Center Los Angeles. This relocation was necessitated by a detainer stemming from her state case. I want to bring to your attention that the Judge in her Federal case has ordered the federal case to run concurrently with her state case, a negotiation which you facilitated. issued about her state case. For some reason the detainer was Given that you were the attorney on record for Ms. Lattany's plea and sentencing, I kindly request your assistance in clarifying this matter with both the Denver County Courts and her federal case. Her Denver District Court Case number is 2022CR6134. The family is understandably distressed and seeking guidance on how to proceed. Your expertise and intervention in this situation would be immensely valuable in providing them with clarity and direction. Please let me know if you require any further information or assistance from my end. Thank you for your prompt attention to this matter. Warm regards, Holli Coulman 9403656400

Exhibit 2
TRULINCS 51090510 - LATTANY, DEJANE REANIECE - Unit: LOS-G-S

Response from
Jason Flores

Williams

(former Counsel!)

FROM: Lattany, J

TO: 51090510

SUBJECT: Jason Flores Williams responds/something is not right

DATE: 02/11/2024 10:06:03 PM

From: "jfw jfwlaw.net" <jfw@jfwlaw.net>

Date: February 11, 2024 at 12:09:11 PM CST

To: Holli Coulman <holli.coulman@gmail.com>

Subject: Re: Urgent: Client DeJane Reaniece Lattany Moved to Federal Detention Center Los Angeles

I'm sorry to hear that she's being moved around. Since the case, I have been diagnosed with a severe autoimmune cancer and am currently in Mexico receiving chemotherapy. I see you work on prison reform. My father was sentenced to 35 years in prison as part of the drug war, which is why I became an attorney. Thank you for your work. As you know the BOP has it's own logic, but it doesn't make sense that a state detainer would result in a transfer to another FPC. I am sick in early part of the week due to treatment, feel better Thursday and Friday. I can only discuss the case with DeJane, as you know. Have her call me Thursday or Friday. I don't practice law anymore due to the illness, but if there's something that can be done, then it can get done. Considering charges, amounts, we achieved an agreement far below sentencing guidelines, so do not want to do anything that would disturb it. Again, thanks for your work.

**Bureau of Prisons
Health Services
Clinical Encounter - Administrative Note**

Inmate Name:	LATTANY, DEJANE REANIECE	Reg #:	51090-510
Date of Birth:	06/30/1990	Sex:	F Race:BLACK
Note Date:	02/08/2024 07:20	Facility:	LOS
		Unit:	G08
		Provider:	Toh, R. (MOUD) MD

Admin Note - Scheduling Note encounter performed at Health Services.

Administrative Notes:

ADMINISTRATIVE NOTE 1 Provider: Toh, R. (MOUD) MD
HER FIRST PRENATAL CARE VISIT APPT ALREADY SCHEDULED BY IMS
CARDIOLOGY APPT STILL PENDING

Copay Required:No **Cosign Required:** No

Telephone/Verbal Order: No

Completed by Toh, R. (MOUD) MD on 02/08/2024 07:21

Exhibit 3

**Bureau of Prisons
Health Services
Health Screen**

Inmate Name:	LATTANY, DEJANE REANIECE	Reg #:	51090-510
Date of Birth:	06/30/1990	Sex:	F
Encounter Date:	01/31/2024 18:03	Provider:	Vrbka, C. RN
		Race:	BLACK
		Facility:	LOS

Seizures: Denied

Diabetes: Denied

Cardiovascular:

Age of Onset:

Hx of Shortness of Breath: No

Hx of Rheumatic Fever: No

Hx of Valvular Disease: No

Hx of SBE Prophylaxis: No

Hx of Chest Pain: No

Hx of Murmur: No

Hx of CAD: No

Hx of CHF: No

Hx of Blood Clot: No

Pacemaker: No

Defibrillator: No

Edema: No

Comments: cardiac arrhythmia, borderline first degree AV block

CVA: Denied

Hypertension: Denied

Respiratory: Denied

Sickle Cell Anemia: Denied

Carcinoma/Lymphoma: Denied

Allergies: Denied

Tuberculosis:

Hx of Previous Disease: No

Blood-tinged Sputum: No

Night Sweats: No

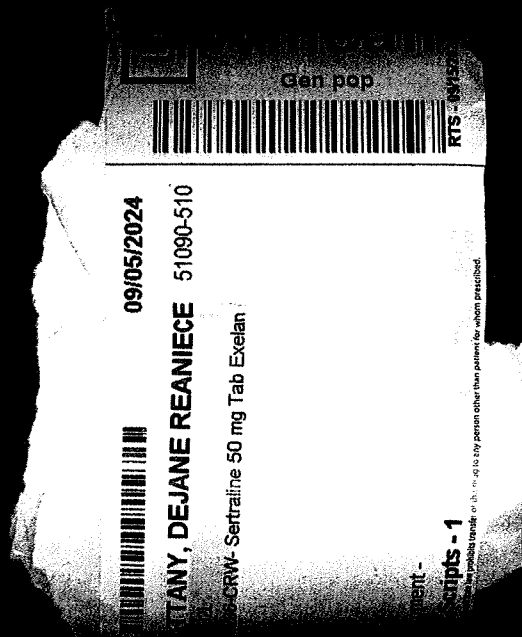
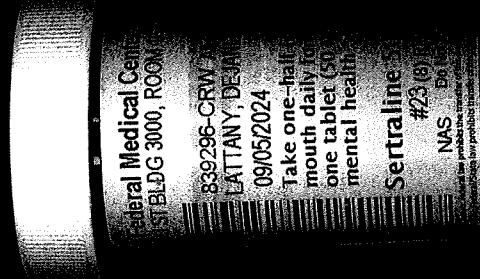
Weight Loss: No

Fever: No

Cough: No

Comments: Up to date PPD, transferred from Victorville USP

Exhibit 4



CLAIM FOR DAMAGE,
INJURY, OR DEATH

INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions.

FORM APPROVED
OMB NO. 1105-0008

1. Submit to Appropriate Federal Agency:

Federal Bureau of Prisons
Regional Office
7338 Shoreline Drive
Stockton, CA 95219

2. Name, address of claimant, and claimant's personal representative if any. (See instructions on reverse). Number, Street, City, State and Zip code. DeJane Peaniece Lattany

3. TYPE OF EMPLOYMENT

☐ MILITARY ☒ CIVILIAN

4. DATE OF BIRTH

06/30/1990

5. MARITAL STATUS

Single

6. DATE AND DAY OF ACCIDENT

1-2024 to Current

7. TIME (A.M. OR P.M.)

Ongoing

8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary).

While in Bureau of Prisons (BOP) custody (Victorville Federal Prison camp, Metropolitan Detention Center, Carswell FMC, etc), Due to the environment that the Bureau of Prisons Decided to place me in, Neglectance, Deliberate Indifference And Lack of Medical care, I have Developed A Cardiovascular AV-Block. I DID NOT Have This Condition Before entering into the Bureau of Prisons system.

9.

PROPERTY DAMAGE

NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code).

The Physical Body/Health of DeJane Peaniece Lattany

BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED. (See instructions on reverse side).

The physical Body/Health of DeJane Peaniece Lattany Has Developed A Cardiovascular AV-Block, A very serious Health condition Likely to worsen and cause impairment or Death. This was Developed Due to Being in Bureau of Prisons custody.

10.

PERSONAL INJURY/WRONGFUL DEATH

STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT. The physical Body/Health of DeJane Peaniece Lattany Has Developed A Cardiovascular AV-Block, A very serious Health condition Likely to worsen and cause impairment or Death. This was Developed Due to Being in Bureau of Prisons custody, I am now constantly experiencing Anxiety, Chest pains, Stress and Fear.

11.

WITNESSES

NAME

ADDRESS (Number, Street, City, State, and Zip Code)

P.A. Babaloid, Doctor Peikar At
Victorville Camp FCI Med, I
Metropolitan Detention Center - Los Angeles
Carswell FMC
JPS Hospital

PO Box 5300 Adelanto, CA 92301

12. (See instructions on reverse).

AMOUNT OF CLAIM (in dollars)

12a. PROPERTY DAMAGE

NONE

12b. PERSONAL INJURY

maximum amount

allowed

NO Amount is worth my Life

12c. WRONGFUL DEATH

NONE

12d. TOTAL (Failure to specify may cause forfeiture of your rights).

max amount allowed

I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM.

13a. SIGNATURE OF CLAIMANT (See instructions on reverse side).

13b. PHONE NUMBER OF PERSON SIGNING FORM

(720) 309 1206 (720) 274 3688
(720) 338 7343

14. DATE OF SIGNATURE

08/07/2024

CIVIL PENALTY FOR PRESENTING
FRAUDULENT CLAIM

The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729).

CRIMINAL PENALTY FOR PRESENTING FRAUDULENT
CLAIM OR MAKING FALSE STATEMENTS

Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.)

TRULINCS 51090510 - LATTANY, DEJANE REANIECE - Unit: CRW-F-A

FROM: 51090510
TO: Psychology Services
SUBJECT: ***Request to Staff*** LATTANY, DEJANE, Reg# 51090510, CRW-F-A
DATE: 09/04/2024 02:54:15 PM

To: Mrs.Yoon/ Mrs.Reynolds
Inmate Work Assignment: Medical Idle

Hello, I am not doing well. I have been back since August 6th 2024 (being ripped away from my newborn) and I have just been able to see the psychiatrist today on the 4th of September. I have only been down to eat 3 times since I have given birth and do not leave the unit. I am struggling with severe postpartum depression, anxiety and panic attacks. I still have frequent chest pains and have not had further help (after it was recommended by the discharge doctor at JPS, where i also had an EKG performed). I was just prescribed medication by the psychiatrist. I would like to be placed back on the waiting list for the FSA class because I cannot be around the inmates that are not on the Ncc floor without experiencing panic attacks, chest pains and anxiety. I would like to mention that my Father just passed away from congestive heart failure this year in April. without managing this i am afraid. Please help me by placing me on the waiting list for the class again until i can try the medication.

TRULINCS 51090510 - LATTANY, DEJANE REANIECE - Unit: CRW-F-A

FROM: 51090510
TO: Warden
SUBJECT: ***Request to Staff*** LATTANY, DEJANE, Reg# 51090510, CRW-F-A
DATE: 07/24/2024 06:36:38 PM

To: Warden Rule
Inmate Work Assignment: Medical Idle/ no duty

I am going into labor any day now. Thank you for your help in everything.
-----Warden on 7/24/2024 1:47 PM wrote:

>

Ms. Lattany, you are required to take the Drug Education class as it is mandatory for anyone with a history of drug use. You have history of drug and alcohol use in your PSR. The class is mandatory and required to be completed within the initial 12 months of your incarceration. You are within the group of people in our roster to take the class as it is offered. All the classes, at any time, will be a mix of people with different cases and backgrounds. There is not another class at this time. Not attending the class would result in refusal. However, we do understand this can be stressful and highly encourage you to address any emotional or mental health need with a Psychologist, by sending an electronic copout to Psychology Services.

From: ~^! LATTANY, ~^!DEJANE REANIECE <51090510@inmatemessage.com>
Sent: Tuesday, July 9, 2024 4:21 PM
Subject: ***Request to Staff*** LATTANY, DEJANE, Reg# 51090510, CRW-F-A

To: Warden Rule
Inmate Work Assignment: Medical Idle/ no duty

-----LATTANY, DEJANE REANIECE on 7/8/2024 8:43 AM wrote:

>

Hello,

I have been assigned to attend a drug class this morning at 8:00am. I am basically 8 months pregnant and suffering from anxiety and too much stress here I also had a panic attack. The population that you have me in the class with is from the high rise (That environment is too stressful to me and my unborn child). This is too stressful for me and my baby.

I have no history of a drug case or any addiction. I don't tolerate drugs. I am here on a white collar case.

I am not Refusing I am simply requesting you to Please move me to the another class.

please note that
the History of
Drug Use was when
I tried marijuana
Once At Age 17.
I am now 34 years old

exhibit X

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:

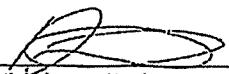
COUNT THREE: MEDICAID FRAUD AND WASTE, 24-31-808(1)(G), (4), C.R.S. (F5) {53651}

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)

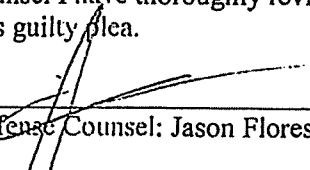
A. (all concessions are set forth herein): Two Years Colorado Department of Corrections Sentence and one year mandatory parole concurrent to sentence in United States District Court- District of Colorado, Criminal case No. 23-CR-00074-NYW. This sentence would be served in the federal prison system. The 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: 5.11.27

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

DEFENDANT: DEJANE REANIECE LATTANY
CASE NUMBER: 1:23-cr-00074-NYW-1

Judgment — Page 2 of 7

IMPRISONMENT

The defendant is hereby committed to the custody of the Federal Bureau of Prisons to be imprisoned for a total term of: **forty-eight (48) months**, to run concurrent with Denver County District Court, Case No. 2022CR6134.

- ☒ The court makes the following recommendations to the Bureau of Prisons:
The Court recommends the defendant be designated to a facility in the state of Colorado.
- ☐ The defendant is remanded to the custody of the United States Marshal.
- ☐ The defendant shall surrender to the United States Marshal for this district:
- ☐ at _____ ☐ a.m. ☐ p.m. on _____.
- ☐ as notified by the United States Marshal.
- ☒ The defendant shall surrender for service of sentence at the institution designated by the Bureau of Prisons:
- ☒ before 12 p.m. within 15 days of designation.
- ☐ as notified by the United States Marshal.
- ☒ as notified by the Probation or Pretrial Services Office.

RETURN

I have executed this judgment as follows:

Defendant delivered on _____ to _____
at _____, with a certified copy of this judgment.

UNITED STATES MARSHAL

By _____

DEPUTY UNITED STATES MARSHAL

Release Plan

Upon Release To Complete the Remainder of my sentence on home confinement, I will reside At my Grandmother's Address Located at 14475 Robins Drive Denver Colorado 80239. While Residing there, I will Assist my Grandmother with All of Her Activities of Daily living. In addition, Most Importantly, I will Be Able To Reunite with my 3 young Children And my newborn Baby who need my Help And Support As their only Mother And Caregiver. This separation Has Been devastating And Has Affected their day to day lives And development. I would like To point out that I was Removed from both my now 2 year old And my newborn in the middle of Breastfeeding with out Time to properly wean them off. I would Be Able To Actively participate in their growth mentally, physically And spiritually in every way.

I will Be Able to Address my preexisting Health conditions Along with my Newly developed Health conditions While in Bop Custody (AV-Block, Borderline Diabetes, Panic Attacks and Anxiety). I will obtain a competent provider while Adopting A new lifestyle that caters to the maintenance of All of my Conditions.

As a leader, I will reconcile my wrong doings By my positive Actions. I will work To volunteer And Help Implement programs to Help prevent Individuals from making the same mistakes And wrong Doings that I Did.

Release Plan

I will accomplish this By partnering with a reputable organization. I will Do my Best to promote education And good decision Making.

Before Self-Surrendering, During Pre-trial Release And state probation, I Completed my Bachelors degree And was inducted into a National Honors Society. Upon Release, I will enroll into A Masters program online Along with Vocational Classes To Help Me to redirect my career path. While Attending Online Courses, I Apply And work As An English Tutor online in order to earn a living to pay Restitution And Take care of my financial obligation With my children. I will continue to move up in positions And Rates of pay in order to Increase my contributions to Restitution And obligations to my children.

I will continue to improve my character And personal qualities By attending counseling And Increasing my spiritual walk with The Lord Jesus Christ.

In Conclusion, I plan to Return to the community As a humble person, Doing My Best to walk up Right with Integrity. I Will Be a Law Abiding Citizen, Taking Full Accountability of All my life choices By Applying wisdom, Understanding and patience. I Have Fully committed myself to Make positive Imprints on Not only my family, But within my entire community And Center of Influence.

Dear Honorable Judge,

I am writing you to inform you that Aside from the Cardiovascular AV Block that I developed while in Federal Bureau of Prisons Custody, I was just informed By the Cardiologist on 9/13/2024 that the EKG I Received on 8/30/2024, that I Also Developed Sinus Arrhythmia/ECG (A Slow Heart Beat) while here at Carswell FMC, I have Been experiencing increased chest pains, Anxiety and panic Attacks Because of this population of inmates that I Am placed with. Although I am considered A "White collar" offender, I Have Been Placed with offenders who Are violent and Abuse Drugs everyday Causing me severe trauma on top of the severe postpartum depression I Am Diagnosed with. I have Been placed on psych medication (See exhibit in injunction motion). I would like to inform you that recently 2 inmates Passed Away From Heart Attacks. AIC Yolanda, who complained of chest pains multiple times to Health Care staff And They did nothing to Help Her. Custody And other Bureau employees Sent her to the High Rise (A stressful environment in which They are placing me) Regardless of Her Complaints. She Later Passed Away from a Heart Attack here at Carswell this year 2024 (While I was in custody in Carswell). Just Recently, on 9/11/2024, It was Announced that Scherry Moses, An Adult in custody here At Carswell FMC passed Away from a Heart Attack. AIC Scherry Moses Passed Away from a Heart Attack After I witnessed her going to Psychology And the Health Clinic Asking for Help multiple days in a row. However, the Federal Bureau of Prisons and Carswell FMC Failed (see exhibit A).

I Have Been Preaching Out to All Staff including the Warden Directly About my Chest Pains, Anxiety and Panic Attacks. The Staff Nor the Warden Has Helped me. I have Resulted in staying On the Unit and not Going Down to eat with the mixed populations Of all united units and inmates out of fear of Having a Heart Attack. I have recently Lost over 20 pounds Since Having my Baby Due to not Being Able to Go Down to eat in the Chow Hall. I Have Asked for milk And I was denied. My Provider NP Smith Stated that I will Be Placed on a Hunger Strike And sent to the SHU (Special Housing Unit). However, I Responded By illustrating that I am not on a Hunger Strike if I am Requesting milk and food But I am Being Denied Because Carswell employees deem it more necessary to Force me to Go Down to eat Regardless of my Suffering. I Am trying to take care of myself By minimizing Panic Attacks, Anxiety and Chestpains. Not only Do Carswell FMC medical Staff and Contractors make decisions Based off of what they deem necessary, The medical Staff and Contractors Are withholding my medical Records Such As EKG Results And Not Documenting the Vitals they take From me When there Are obvious Abnormal Readings or Results. Instead, they Facilitate Multiple Retakes and Document the Results most Favorable. I Do not Want to Be Like the Adults in Custody who passed Away While in Bureau of Prisons and Carswell FMC Custody. I need to make it Back Home to my Newborn Baby and children ALive. They need me. Although This information is in the form of a Letter, I make the Afforementioned under the Penalty of Perjury that the contents Are True. And correct. I am willing to submit to a Lie Detector Test.

Dejane Peaniece Lattany 51090510 9/14/2024 Fort Worth, Texas



exhibit A for Letter

of 48

TRULINCS 51090510 - LATTANY, DEJANE REANIECE - Unit: CRW-F-A

FROM: Psychology Services
 TO: 51090510
 SUBJECT: RE:***Inmate to Staff Message***
 DATE: 09/13/2024 08:37:02 AM

Ms. LATTANY,

Thank you for all the information. It is all being considered. I will be out of the office the next two weeks so I will be speaking with the Chief Psychologist, your Psychiatrist, and NP Smith so they can be informed and address your concerns while I am away.

Dr. Reynolds.

From: ~^! LATTANY, ~^!DEJANE REANIECE <51090510@inmatemessage.com>
 Sent: Thursday, September 12, 2024 8:05 AM
 Subject: ***Request to Staff*** LATTANY, DEJANE, Reg# 51090510, CRW-F-A

To: Dr. Reynolds/ R.N Yoon
 Inmate Work Assignment: Medical Idle/ No duty

-----LATTANY, DEJANE REANIECE on 9/12/2024 8:04 AM wrote:

>

Hello, I am requesting that you give serious consideration to what I have been saying about my health, considering that my father passed away while i was incarcerated here at Carswell fmc on 4/2024 from heart issues.

1) I have an unresolved Cardiovascular AV-Block THAT WAS DEVELOPED WHILE IN FEDERAL BOP CUSTODY coupled with chest pains and anxiety that has progressed since being placed in mixed populations with violent offenders and drug addicts who keep overdosing and withdrawing causing me trauma and panic attacks (I am a white collar offender, minimum custody)

2)AIC Yolanda passed away from a HEART ATTACK in Carswell custody in 2024 after complaining of chest pains and your staff allowed her to be housed in the high rise anyway. (THE SAME WAY I AM COMPLAINING)

3)AIC Scherry Moses passed away this week 9/11/2024 Due to a HEART ATTACK after I witnessed her going to Medical staff and psychology staff seeking help (THE SAME WAY I AM DOING).

4) I Have not been able to leave the unit to eat nor leave the unit to do anything when there is a lot of inmate moving around. I have only been to eat 4 times since I got back almost 2 months.

5) I was just placed on medication for mental health after being diagnosed with SEVERE POST-PARTUM DEPRESSION. The Medication has not worked and has been causing stomach pain.

--I do not Go down to eat nor do I leave the unit unless I have to and inmate movement is at a minimum and even then I still suffer from anxiety, panic attacks and chest pains every time.

--I am requesting NOT to be cleared and to remain on the unit (NCC 4th Floor) unit until I am stabilized regarding my SEVERE POST-PARTUM DEPRESSION, also when there are no more frequent CHEST PAINS and when I am able to function without anxiety and panic attacks.

---I am also Requesting to see if it is possible to have milk to drink because I have not eaten any meals and have been DENIED/Refused food Trays to be brought up regardless of my conditions.

A

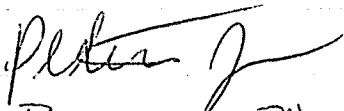
Declaration of Petersenne Johnson

I make the following under the penalty of perjury that the following is true

I am an inmate / adult in custody at Carswell Federal Medical Center and I reside in the same unit as DeJane Lattany and know first hand that AIC Scherry Mises passed away of a heart attack while in custody of Carswell FMC and the Bureau of Prisons on or around September 11, 2024. In addition, AIC Uplanda complained of chest pains and passed away in the custody of Carswell FMC and the Bureau of Prisons in the summer of 2024.

I am also a witness that AIC DeJane Lattany does not attend chow for regular meals and has not recently went down to eat in the chow hall since she came back to Carswell from delivering the baby.

I make this under the penalty of perjury



Petersenne Johnson

BOP# 35125-510

Fort Worth, Texas

A
TRULINCS 51090510 - LATTANY, DEJANE REANIECE - Unit: CRW-F-A

FROM: 51090510

TO: Warden

SUBJECT: ***Request to Staff*** LATTANY, DEJANE, Reg# 51090510, CRW-F-A

DATE: 09/12/2024 08:04:05 AM

To: Mr. Rule

Inmate Work Assignment: Medical idle/no duty

Hello, I am requesting that you give serious consideration to what I have been saying about my health, considering that my father passed away while i was incarcerated here at Carswell fmc on 4/2024 from heart issues.

1) I have an unresolved Cardiovascular AV-Block THAT WAS DEVELOPED WHILE IN FEDERAL BOP CUSTODY coupled with chest pains and anxiety that has progressed since being placed in mixed populations with violent offenders and drug addicts who keep overdosing and withdrawing causing me trauma and panic attacks (I am a white collar offender, minimum custody)

2)AIC Yolanda passed away from a HEART ATTACK in Carswell custody in 2024 after complaining of chest pains and your staff allowed her to be housed in the high rise anyway. (THE SAME WAY I AM COMPLAINING)

3)AIC Scherry Moses passed away this week 9/11/2024 Due to a HEART ATTACK after I witnessed her going to Medical staff and psychology staff seeking help (THE SAME WAY I AM DOING).

4) I Have not been able to leave the unit to eat nor leave the unit to do anything when there is a lot of inmate moving around. I have only been to eat 4 times since I got back almost 2 months.

5) I was just placed on medication for mental health after being diagnosed with SEVERE POST-PARTUM DEPRESSION. The Medication has not worked and has been causing stomach pain.

--I do not Go down to eat nor do I leave the unit unless I have to and inmate movement is at a minimum and even then I still suffer from anxiety, panic attacks and chest pains every time.

--I am requesting NOT to be cleared and to remain on the unit (NCC 4th Floor) unit until I am stabilized regarding my SEVERE POST-PARTUM DEPRESSION, also when there are no more frequent CHEST PAINS and when I am able to function without anxiety and panic attacks.

---I am also Requesting to see if it is possible to have milk to drink because I have not eaten any meals and have been DENIED/Refused food Trays to be brought up regardless of my conditions.

TRULINCS 51090510 - LATTANY, DEJANE REANIECE - Unit: CRW-F-A

FROM: Psychology Services
TO: 51090510
SUBJECT: RE:***Inmate to Staff Message***
DATE: 09/05/2024 06:42:02 AM

Hello Ms. Lattany,

I really appreciate you giving it your full try on the first session. You will be placed back on the waitlist. Please don't hesitate to reach out, you have support system in place here to assist you through this difficult time.

*

Yoon RN, Resolve

From: ~^! LATTANY, ~^!DEJANE REANIECE <51090510@inmatemessage.com>
Sent: Wednesday, September 4, 2024 2:54 PM
Subject: ***Request to Staff*** LATTANY, DEJANE, Reg# 51090510, CRW-F-A

To: Mrs.Yoon/ Mrs.Reynolds
Inmate Work Assignment: Medical Idle

Hello, I am not doing well. I have been back since August 6th 2024 (being ripped away from my newborn) and I have just been able to see the psychiatrist today on the 4th of September. I have only been down to eat 3 times since I have given birth and do not leave the unit. I am struggling with severe postpartum depression, anxiety and panic attacks. I still have frequent chest pains and have not had further help (after it was recommended by the discharge doctor at JPS, where i also had an EKG performed). I was just prescribed medication by the psychiatrist. I would like to be placed back on the waiting list for the FSA class because I cannot be around the inmates that are not on the Ncc floor without experiencing panic attacks, chest pains and anxiety. I would like to mention that my Father just passed away from congestive heart failure this year in April. without managing this i am afraid. Please help me by placing me on the waiting list for the class again until i can try the medication.

TRULINCS 51090510 - LATTANY, DEJANE REANIECE - Unit: CRW-F-A

FROM: 51090510

TO: Psychology Services

SUBJECT: ***Request to Staff*** LATTANY, DEJANE, Reg# 51090510, CRW-F-A

DATE: 09/04/2024 02:54:15 PM

To: Mrs.Yoon/ Mrs.Reynolds

Inmate Work Assignment: Medical Idle

Hello, I am not doing well. I have been back since August 6th 2024 (being ripped away from my newborn) and I have just been able to see the psychiatrist today on the 4th of September. I have only been down to eat 3 times since I have given birth and do not leave the unit. I am struggling with severe postpartum depression, anxiety and panic attacks. I still have frequent chest pains and have not had further help (after it was recommended by the discharge doctor at JPS, where i also had an EKG performed). I was just prescribed medication by the psychiatrist. I would like to be placed back on the waiting list for the FSA class because I cannot be around the inmates that are not on the Ncc floor without experiencing panic attacks, chest pains and anxiety. I would like to mention that my Father just passed away from congestive heart failure this year in April. without managing this i am afraid. Please help me by placing me on the waiting list for the class again until i can try the medication.

.....

please note that
the Bureau of
Land Management
is a part of
the U.S. Department
of the Interior
and is not a
part of the
Bureau of
Reclamation.

>

✓

I am not Refusing I am simply requesting you to Please move me to the another class.

Lattany, DeJane
BOP Registration Number: 51090-510
P.O. Box 27137
Federal Medical Center, Carswell
Fort Worth TX, 76127-0137



Legal mail

FMC Carswell
P.O. Box 27066
Fort Worth, TX 76102
Mailed: 9/17/24
The enclosed letter was processed through special
mailing procedures for forwarding to you. The letter
has not been inspected. If the writer
has included any material
which is not
pertinent to the
case, it should be
omitted.