

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.

Dejane Beaniece Lattany

* Supplement

Exhibits

FILED

UNITED STATES DISTRICT COURT
DENVER, COLORADO

NOV 05 2024

JEFFREY P. COLWELL
CLERK

Exhibit 1: Present Health Records that Confirm the Declination of
Both my physical and Mental Health

Exhibit 2: My State plea Agreement, showing that my former counsel DID NOT
Allow me to Read and Initial myself, indicating my understanding
of the contents of the plea Agreement. Instead, my former
counsel Initialed my initials for me and Dated the Last page
Next to my signature, stating that he would explain
Later. However, he Never explained. An Expert Witness can
Easily Be employed to Conclude that the initials and dates
Are not my handwriting. I am also willing to take a
Lie Detector Test on my statement that I Was and
Still am Unaware of the Charges And their Nature, the
Penal consequences of my Plea Agreement, and the Rights
I was Waiving By pleading Guilty. This is why it took
for the counsel that you appointed to me

(For my appeal that I requested) to inform me that I signed an appellate waiver and I could not proceed with a Direct appeal and would need to take the avenue of a 2255 instead. This exhibit can be used to back up my statements within my 2255 motion as well.

Exhibit [3]: Bureau of Prisons sentence computation sheet showing the State of Colorado Detainer Disqualifying me for Home Confinement in 2025 (even with my sentence of Imprisonment for the state will be over/completed). Because of the concurrent sentence, the state and the BOP has decided to detain me until 2027 making all of my Good Conduct Time, First Step Act Credits and Second Chance Act None Applicable. The Bop and the State of Colorado wants me detained until the date of my parole with them has ended. Not only does this stop me from getting back to Colorado to report for their parole on time, report to Probation/Halfway house and Home Confinement sooner, this detainer stops me from being placed in the correct population (with minimum custody non-violent offenders). I am not a flight risk and my health is declining in this environment. The Bop's interpretation of my concurrent sentence as a detainer, is the reason I need this Federal Court to intervene because I am experiencing cruel and unusual punishment, more punitive than this court intended.

Exhibit 4: Order showing the court for my state case refusing to intervene by denial after I have reached out several times and followed the court's instruction to reach out to the Colorado Department of Corrections, who state they did not request a Detainer on me And I cannot request special needs Parole because I am in BOP custody And I don't have a case manager with the CDC.

I Am Asking this Federal Court to Consider Modifying the Remainder of my Federal Sentence to Home Confinement Due to All of the complications and custody placement issues that I am enduring while my health is declining. On home Confinement, I will Be Legally Under Bureau of Prisons Custody.

Thank you for Taking the Time to Consider my Requests and prayers.

Respectfully Submitted,

Dejane Ricaniece Lattany

51090-510

FMC Carswell

Fort Worth Texas

Exhibit 1

**Bureau of Prisons
Health Services
Health Problems**

Reg #: 51090-510 Inmate Name: LATTANY, DEJANE REANIECE

<u>Description</u>	<u>Axis</u>	<u>Code Type</u>	<u>Code</u>	<u>Diag. Date</u>	<u>Status</u>	<u>Status Date</u>
Current						
Anemia, unspecified 01/12/2024 15:10 EST Babalola, Esther (MOUD) DNP, FNP-BC In pregnancy		ICD-10	D649	01/12/2024	Current	
Obesity 12/06/2023 12:49 EST Babalola, Esther (MAT) DNP, FNP-BC BMI= 41		ICD-10	E669	12/06/2023	Current	
Major Depressive Disorder: Single Episode: Severe 09/04/2024 14:31 EST Allison, C. (MOUD) MD, Chief Psychiatrist with anxious distress	I	DSM-IV	F32.2	09/04/2024	Current	
Major Depressive Disorder: Recurrent Episode: Severe 09/04/2024 16:13 EST Reynolds, A. PsyD, Clinical Psychologist With peripartum onset	I	DSM-IV	F33.2	08/30/2024	Current	
Unspecified Trauma- And Stressor-Related Disorder 09/04/2024 14:31 EST Allison, C. (MOUD) MD, Chief Psychiatrist	I	DSM-IV	F43.9	09/04/2024	Current	
Inflammation of eyelid 08/30/2024 14:48 EST Sotayo, O. (MOUD) APRN, FNP-C R>L		ICD-10	H019	08/30/2024	Current	

Exhibit 1

attany, DeJane
34 years
Female

ID: 51090-510

30-Aug-2024 10:45:34

FMC Carswell Clinic

Vent. rate 49 bpm
PR interval 194 ms
QRS duration 82 ms
QT/QTc 474/428 ms
P-R-T axes 49 38 42

Marked sinus bradycardia
Abnormal ECG

8/26/2024 JPS mfm

HR 56

she told them h/o

1st degree AV block

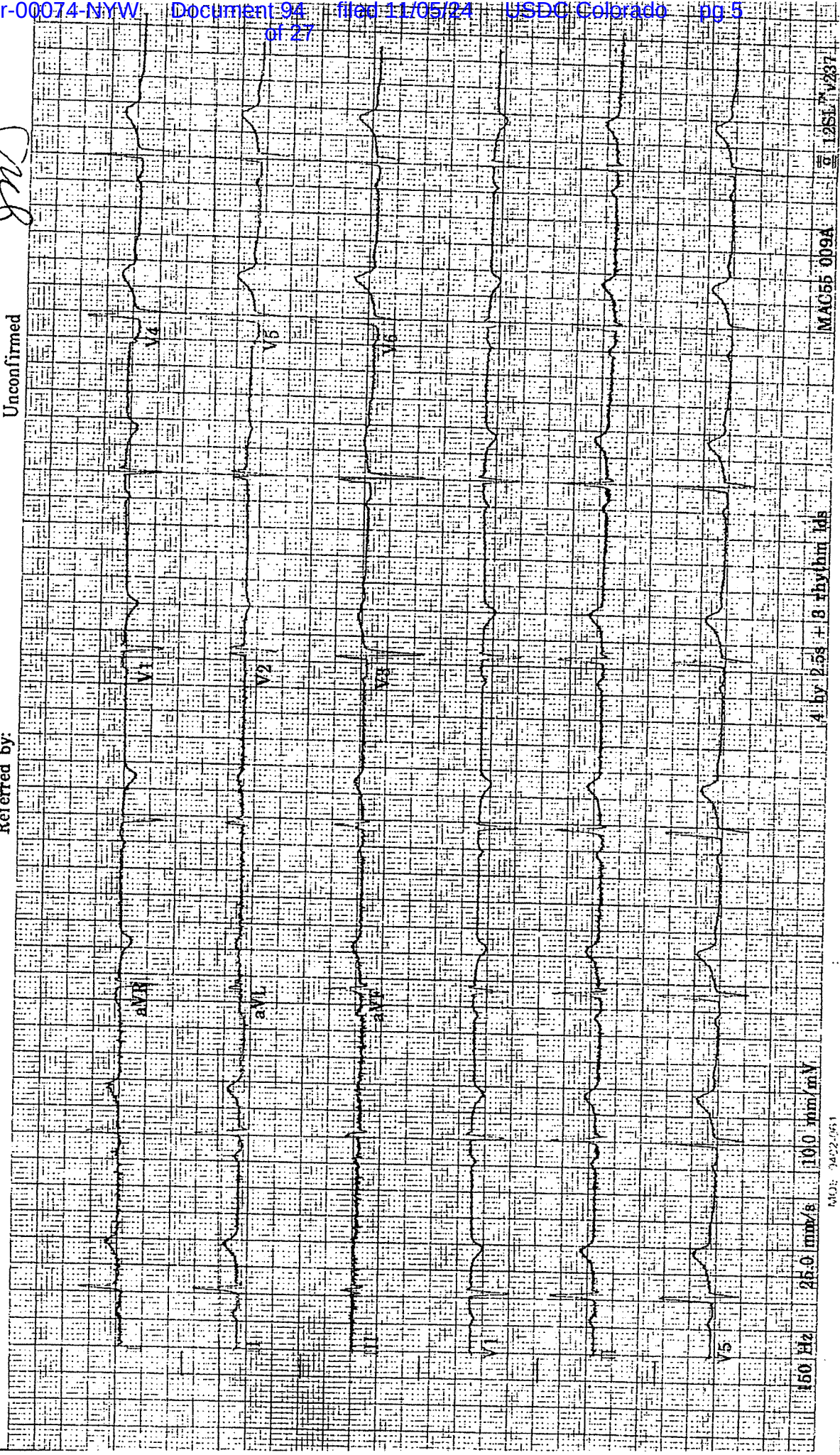
Technician: Tmasters Rn
Test ind:

510 90-510

echo, holter, CXR, vitals

Unconfirmed

Referred by:



4 by 2.5s + 18 rhythm ids

150 Hz 25.0 mm/s 10.0 mm/mV

MADE: 1402-051

MAC55 009A

12SL V237

Exhibit 1

FMC Carswell Clinic

30-Aug-2024 10:46:00

ID: 51090-510

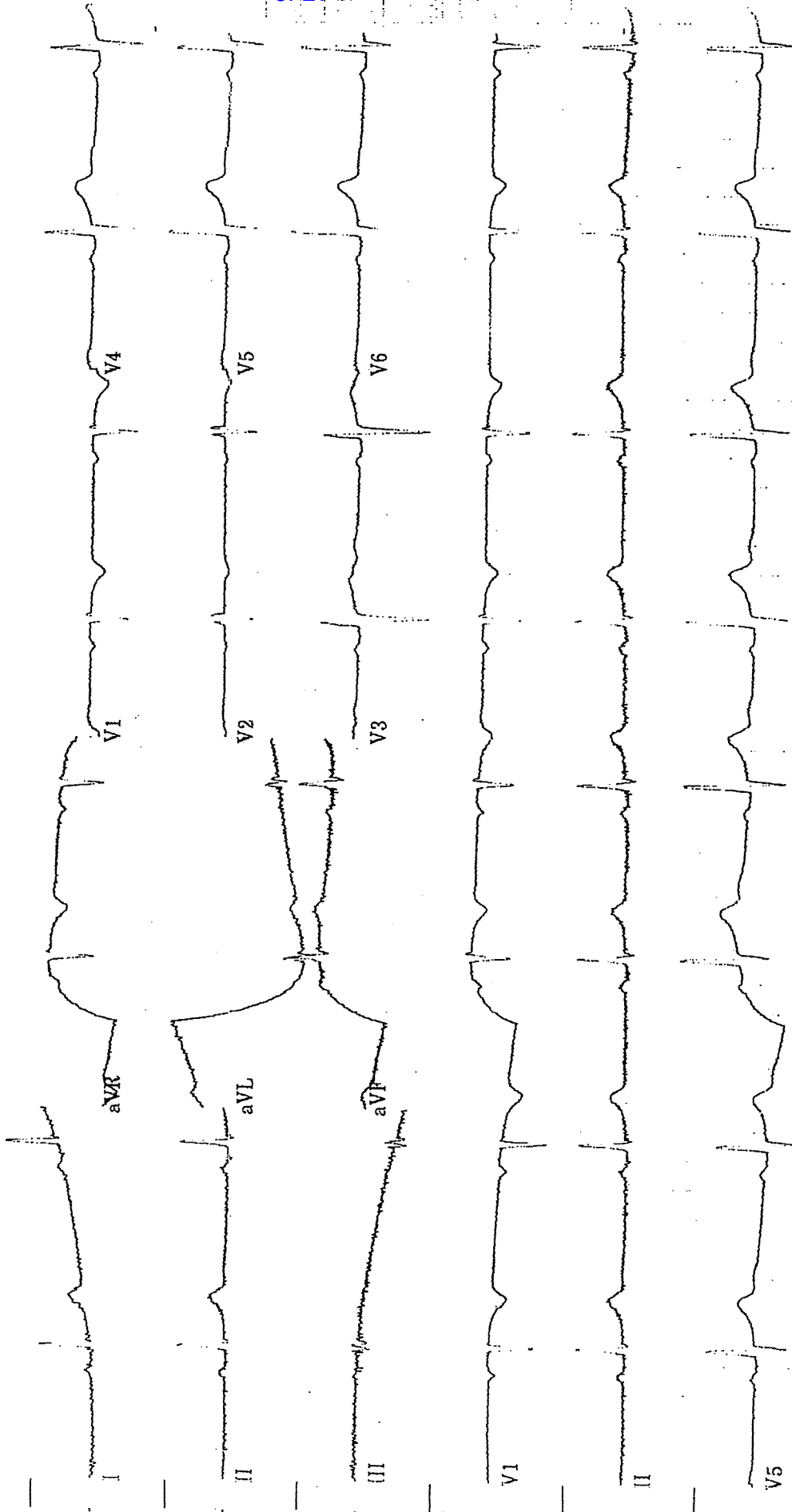
atlany, DeJane

Marked sinus bradycardia with sinus arrhythmia
Abnormal ECG

Vent. rate 48 bpm
PR interval 188 ms
QRS duration 82 ms
QT/QTc 472/421 ms
P-R-T axes 53 30 19

Technician: Tmasters Rn
Test ind:

Referred by: Unconfirmed



150 Hz 25.0 mm/s 10.0 mm/mV

4 by 2.5s + 3 rhythm lds

MAC55 009A

12SL™ v237

FMC Carswell**J Street, Building 3000, Fort Worth, TX 79127****Tel: 817.782.4719 Fax: 817.782.4602****Report prepared by DigiCardio, Inc. Tel: 866.344.4227****HOLTER MONITOR REPORT**

Patient Name:	90510091224 Black Disk 1	Interp. Physician:	Janet Shackleford, M.D.
Date of Birth:	6/30/1990	Scan Number:	
ID :	90510091224	Date Recorded:	9/12/2024 @ 6:53
Age:	34 Years	Date Processed:	9/26/2024
Sex:	M	Recorder Num:	041707
Analyst:	CE	HookupTech:	AAB
Physician:	Janet Shackleford, M.D.	Medications:	
Indications:			

The patient was monitored for a total of 47:59 hours. The total time analyzed was 45:04 hours. Start time was 6:53am1. There was a total of 172297 beats. Less than 1% were Ventricular beats, less than 1% were Supraventricular beats, and patient is not paced.

Mean Heart Rate: 64	Total Beats: 172297
Maximum Heart Rate: 147 @ 6:22am2	Tachycardia beats: 11159 (≥ 100 BPM) 6%
Minimum Heart Rate: 38 @ 10:49pm1	Bradycardia beats: 31833 (≤ 50 BPM) 18%
Pauses: 0 (> 2.5 sec.)	Longest RR at: 1.65 seconds at 10:51pm2

Ventricular Ectopy

Total: 163
Early/Late: 126/ 37
Pairs: 0
Total Runs: 0
Beats in Runs: 0
Longest Run: 0 @ 6:53am1 (0 BPM)
Fastest Run: 0 @ 6:53am1 (0 BPM)
RonT: 0

Supraventricular Ectopy

Total: 19
Single: 16
Pairs: 0
Total Runs: 0
Beats in Runs: 0
Longest Run: 0 @ 6:53am1 (0 BPM)
Fastest Run: 0 @ 6:53am1 (0 BPM)
Aberrant: 3

RR Variability

SDNN: 247.57 ms
pNN50: 30.095 %
RMSSD: 61.565 ms
SDSD: 61.565 ms

ST Absolute

Depression: *** mm
Elevation: *** mm

Underlying sinus rhythm. Periods of slight sinus arrhythmia.

Periods of sinus bradycardia totaled just over 11 hours.

Periods of sinus tachycardia totaled 1.75 hours.

Non-specific ST-T wave changes.

Occasional primarily unifocal PVCs.

Rare PACs.

Isolated patient event correlated with sinus tachycardia.

Lattany, DeJane
31090-510
6/30/1990

All the Mean HR of 64 bpm, RR interval = 0.16 sec, QRS duration = 0.09 sec, QT interval = 0.32 sec, and QTc = 0.40 sec,

all within normal limits.

Physician's Signature:

Janet Shackleford, M.D.

Exhibit 2

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 520 West Colfax Ave. Denver, Colorado 80204		DATE FILED: May 18, 2023 10:54 AM FILING ID: 37640A5C5757A CASE NUMBER: 2022CR6134
THE PEOPLE OF THE STATE OF COLORADO, Plaintiffs, v. DEJANE REANIECE LATTANY (DOB 06/30/1990) Defendant.		▲ COURT USE ONLY ▲ Case No.: 22CR6134 Courtroom: 5G
PHILIP J. WEISER, Attorney General Daniel T. Brechbuhl* Assistant Attorney General II Ralph L. Carr Colorado Judicial Center 1300 Broadway, 9th Floor Denver, CO 80203 (720) 508-6482 E-Mail: Daniel.Brechbuhl@coag.gov Registration Number: 31047 *Counsel of Record		
DEFENDANT'S REQUEST TO PLEAD GUILTY		

This document represents my desire to plead guilty. I know that I have the right to remain silent, that I do not have to make this request, and anything I write or say may be used against me. Knowing that, I swear or affirm that I have read and understand everything in this and all of the documents I have submitted in this case. I understand all of the rights that I am giving up by pleading guilty.

Defendant's Initials:

DL 1. I am 32 years old. I have completed celled years of school. At this time my mental and physical health is satisfactory. I am thinking clearly. My decision to plead guilty is not being affected in any way by alcohol, drugs, or medication.

DL 2. I understand what is happening in this Courtroom today. I read, speak, and understand the English language, or all of the documents and proceedings in this matter have been fully explained to me in a language that I understand.

DL 3. I understand that if I am not a citizen of the United States, this guilty plea can cause deportation, exclusion from admission to the United States, or denial of naturalization, or other immigration consequences.

DL 4. I understand the nature of the charge(s) against me and the elements of the charge(s), which the prosecution would have to prove beyond a reasonable doubt to a unanimous jury before I could be found guilty at trial. The essential elements of the crime to which I am pleading guilty are attached to this document. With my lawyer, I have reviewed the

4/2/24, 8:33 AM

Inmate Locator

An official website of the United States government. Here's how you know

[A-Z Topics](#) [Site Map](#) [FOIA](#)

[Search bop.gov](#)

Find an inmate.

Locate the whereabouts of a federal inmate incarcerated from 1982 to the present. Due to the First Step Act, sentences are being reviewed and recalculated to address pending Federal Time Credit changes. As a result, an inmate's release date may not be up-to-date. Website visitors should continue to check back periodically to see if any changes have occurred.

Find By Number

Find By Name

First

Middle

Last

Race

Age

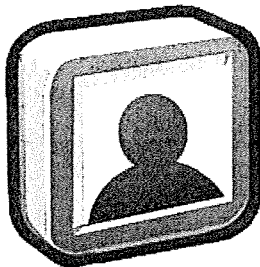
Sex

dejane

lattany

1 Result for search dejane lattany

[Clear Form](#)



DEJANE REANIECE LATTANY

Register Number: 51090-510

Age: 33

Race: Black

Sex: Female

Located at: Los Angeles MDC

Release Date: 04/05/2027

Related Links

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Exhibit 2

attached document(s) explaining the elements of the charge I am pleading guilty to. I have signed the attached document(s) because I thoroughly understand them.

- DL 5. I understand that I have each of the following rights:
- DL (a) I know that I have the right to plead "not guilty" to all charges against me and to have a speedy and public trial to a jury of 12 persons or to a judge on all charges against me.
- DL (b) I know that I have the right to be represented by a lawyer at all stages of these proceedings, and if I cannot afford a lawyer, the Court will appoint a lawyer for me, free of charge.
- DL (c) I know that I have the right to be presumed innocent at trial and to require the prosecution to prove at trial each element of each charge beyond a reasonable doubt before I could be found guilty.
- DL (d) I know that at that trial I have the right to see and cross-examine all witnesses who might testify against me.
- DL (e) I know that I have the right to present any defense I might have, and to call any witnesses in my own defense. If those witnesses were unwilling to appear, I understand that the Court would issue subpoenas at my request and would order those witnesses to appear and testify. I understand that I would have no burden to present any evidence or witnesses at trial. I would not have to prove myself not guilty. I would be presumed innocent at trial and the burden to prove my guilt would rest solely with the prosecution.
- DL (f) I know that I have the right to remain silent, and not say anything or make any statement whatsoever about this case. I know that if I do choose to make any statement, that statement could be used against me in Court.
- DL (g) I also know that I have the right to either testify at trial or to remain silent, and that if I chose not to testify, I could have the Judge instruct the jury that they could not consider my decision to not testify for any purpose. I understand that whether I testified or not at trial would be purely my decision.
- DL (h) I know that if I were convicted of any charge at trial I would have the right to appeal that conviction to a higher Court.
- DL (i) I know that I may have a right to a Preliminary Hearing, and I understand that right.
- DL (j) I am aware that I may have the right to bail, and I am aware of the amount of that bail.
- DL (k) I know that when I plead guilty, except for the right to counsel, I give up all of these rights and all possible defense(s) to the charge(s).

DL 6. The decision to plead guilty is my decision and it has been made freely and voluntarily. There has been no threat, coercion, undue influence, or force used to make me plead guilty. I know that I do not have to follow my lawyer's advice and that I do not have to plead guilty. This is my decision to plead guilty.

DL 7. I know that a plea of guilty admits the charge, and a plea of not guilty denies the charge. I admit the charge(s) to which I am pleading guilty and each of the elements, which are attached to this document. I also admit that there are sufficient facts in this case which could be presented at trial by the prosecution, which would result in a strong likelihood of my conviction.

DL 8. To the charge(s) of **COUNT THREE: MEDICAID FRAUD AND WASTE 24-31-808(1)(g), (4), C.R.S. (Class 5 Felony){53651}**, I plead **GUILTY**.

DL 9. The elements of the charge(s) to which I am pleading guilty, which are attached to this document, have been explained to me. I understand fully everything the prosecutor would have had to prove beyond a reasonable doubt to each and every member of a 12-person jury before I could have been convicted.

DL 10. I understand that one of the elements, which the prosecutor would have had to prove, is my mental state at the time of commission of the crime. In addition to understanding the elements, I understand the applicable definition(s) below, and I understand what the prosecutor would have had to prove in that regard:

DL INTENTIONALLY: A person acts "intentionally" or "with intent" when his/her conscious objective is to cause the specific result proscribed by the statute defining the offense. It is immaterial whether or not the result actually occurred.

DL KNOWINGLY or WILLFULLY: A person acts "knowingly" or "willfully" with respect to conduct or to a circumstance described by a statute defining an offense when he/she is aware that his/her conduct is of such nature or that such circumstance exists. A person acts "knowingly" or "willfully" with respect to a result of his/her conduct when he/she is aware that his/her conduct is practically certain to cause the result.

DL RECKLESSLY: A person acts "recklessly" when he/she consciously disregards a substantial and unjustifiable risk that a result will occur or that a circumstance exists.

DL NEGLIGENTLY: A person acts with "criminal negligence" when, through a gross deviation from the standard of care that a reasonable person would exercise, he/she fails to perceive a substantial and unjustifiable risk that a result will occur or that a circumstance exists.

DL 11. I understand that the Court is not bound by and does not have to follow anyone's recommendations concerning the entry of a guilty plea, the penalty to be imposed, and the granting or denial of probation. Any proposed plea agreement and any concession(s) are fully and accurately set forth in this written document.

DL 12. I have had a full opportunity to discuss with my lawyer everything I know about this case and all defenses that may be available to me. My lawyer has also discussed the elements of the charges, which the prosecutor would have to prove, all lesser included charges, and all possible defenses. I understand my lawyer, and I am satisfied with the advice and

Exhibit 2

representation I have received from my lawyer.

MA 13. I understand that if the Court accepts my guilty plea to a felony I will stand convicted of a felony. I understand that this felony conviction may be used against me in any future proceeding under the habitual criminal laws. I also understand that my felony conviction may be used against me in any future proceeding concerning my credibility. If I have entered into a Stipulation of a Deferred Judgment and Sentence, and I have not yet completed the terms of that agreement, my guilty plea may be used against me in any future proceeding. I understand if I have entered into a Stipulation of a Deferred Judgment and Sentence and I violate the terms of that agreement, I may stand convicted of a felony and then I will be re-sentenced by the Court.

MA 14. I understand the full range of potential penalties for my offense(s) as set forth below and in the chart of applicable sentencing ranges on page 6.

MA (a) I know that if I plead guilty to a felony, I may be sentenced to the custody of the Department of Corrections (prison), as shown in the below chart on page 6 for my applicable sentencing range. I understand that the Department of Corrections will determine my place of incarceration.

MA (b) If applicable, I understand and agree that there exist facts or circumstances surrounding the offense(s) I committed which are extraordinarily aggravating and will call for the Judge to impose a sentence above the maximum in the presumptive range, and as high as the maximum shown in the "extraordinary circumstances" portion of the box marked in the chart below. I agree to such a sentence. I understand that I have the right to require the prosecution to prove to a unanimous jury beyond a reasonable doubt any facts that bear upon whether extraordinary aggravating circumstances are present and upon whether any sentence will be above the top of the presumptive range. I understand and agree that by pleading guilty, I give up that right, including the right to have those facts proved beyond a reasonable doubt and the right to have them determined by a jury. I understand that my guilty plea is a waiver of my right to a jury trial on all issues including the determination of the penalty to be imposed and of all facts relating to, or supporting, a sentence above the top of the presumptive range.

MA (c) If applicable, I know that if the Judge were to conclude that extraordinary mitigating or aggravating circumstances are present in my case, I could be sentenced to any term of imprisonment from the minimum to the maximum sentence allowed by law as set out in the "extraordinary circumstances" portion of the box marked in the chart below on page 6. I understand that I have the right to require the prosecution to prove to a unanimous jury beyond a reasonable doubt any facts that bear upon whether extraordinary aggravating circumstances are present and upon whether any sentence will be above the top of the presumptive range. I understand and agree that by pleading guilty, I give up that right, including the right to have those facts proved beyond a reasonable doubt and the right to have them determined by a jury. I agree to let the Judge, in the Judge's discretion, decide all such facts and decide whether or not extraordinary aggravating circumstances are present in my case and whether or not to impose a sentence above the top of the presumptive range. I understand that my guilty plea is a waiver of my right to a jury trial on all issues including the determination of the penalty to be

imposed and of all facts relating to, or supporting, a sentence above the top of the presumptive range.

MA (d) If applicable, I understand and agree that my criminal record will allow the Judge to impose a sentence above the maximum in the presumptive range, and as high as the maximum shown in the "extraordinary circumstances" portion of the box marked in the chart below on page 6. I understand that I have the right to require the prosecution to prove to a unanimous jury beyond a reasonable doubt facts about my criminal record that bear upon whether extraordinary aggravating circumstances are present and upon whether any sentence will be above the top of the presumptive range. I understand and agree that by pleading guilty, I give up that right, including the right to have any such facts proved beyond a reasonable doubt and the right to have them determined by a jury. I understand that my guilty plea is a waiver of my right to a jury trial on all issues including the determination of the penalty to be imposed and of all facts about my criminal record relating to, or supporting, a sentence above the top of the presumptive range.

MA (e) If applicable, I understand and agree that I am pleading guilty to a "crime of violence." A "crime of violence" sentencing requires the Court to sentence me to prison for at least the midpoint in the presumptive range and no more than twice the maximum of the presumptive range, as shown on the chart below on page 6. I understand and agree that the minimum mandatory sentence shall be _____ years in prison with a maximum potential sentence of _____ years in prison.

MA (f) If applicable, I know that if the Court sentences me to incarceration for a felony, that sentence must be to at least the midpoint, but not more than twice the maximum in the presumptive range, if, at the time of committing the crime(s) in this case, I was:

- _____ On probation or parole for another felony, or
- _____ Confined or had escaped while completing a felony sentence, or
- _____ On bond after revocation of probation for another felony or for an act that would have been a felony if committed by an adult, or
- _____ On a felony appeal bond.

I understand and agree that by pleading guilty, I give up any right I might have to have a jury determine whether any of these circumstances are present in my case, and I agree to allow the Judge to make that determination and decide whether my sentence will be above the top of the presumptive range. Further, I admit that circumstances that I have initialed above are present in my case.

MC (g) If applicable, I know that if the Court sentences me to incarceration for a felony, the Court must sentence me to at least the minimum, but not more than twice the maximum in the presumptive range, if, at the time of committing the crime(s) in this case, I was:

- _____ Charged with or on bond for another felony in another case for which I have now been convicted, or
- _____ Charged with or on bond for an act that would be a felony if committed by an adult, or
- _____ Under a Deferred Judgment and Sentence for a felony or for an act that would be a felony if committed by an adult, or
- _____ On a juvenile parole for an offense that would be considered a

felony if committed by an adult, or

_____ On bond after pleading guilty to a lesser offense when the original offense charged was a felony or would be a felony if committed by an adult.

I understand and agree that by pleading guilty, I give up any right I might have to have a jury determine whether any of these circumstances are present in my case, and I agree to allow the Judge to make that determination and decide whether my sentence will be above the top of the presumptive range. Further, I admit that circumstances that I have initialed above are present in my case.

_____ (h) I know that if I receive a sentence to the Department of Corrections, I must serve a mandatory period of parole as indicted below. Parole is after, in addition to and distinct from any other sentence imposed. Additionally, if my parole is revoked I may be required to serve the time remaining on parole in the Department of Corrections. The period of parole I must serve is as indicated in the box marked in the following sentencing range chart:

MARKED BOX BELOW INDICATES APPLICABLE SENTENCING RANGE	FELONIES COMMITTED ON OR AFTER JULY 1, 1993					
		PRESUMPTIVE RANGE		EXTRAORDINARY CIRCUMSTANCES		MANDATORY PERIOD of PAROLE
	CLASS	MINIMUM	MAXIMUM	MINIMUM	MAXIMUM	MANDATORY PAROLE
	1	Life Imprisonment	Death	Life Imprisonment	Death	
	2	8 years \$5,000 fine	24 years \$1,000,000 fine	4 years	48 years	5 years
	3	4 years \$3000 fine	12 years \$750,000 fine	2 years	24 years	5 years
	Extra- ordinary Risk Crime	4 years \$3000 fine	16 years \$750,000 fine	2 years	32 years	5 years
	4	2 years \$2000 fine	6 years \$500,000 fine	1 year	12 years	3 years
	Extra- ordinary Risk Crime	2 years \$2000 fine	8 years \$500,000 fine	1 year	16 years	3 years
XXX	5	1 year \$1000 fine	3 years \$100,000 fine	6 months	6 years	2 years
	Extra- ordinary Risk Crime	1 year \$1000 fine	4 years \$100,000 fine	6 months	8 years	2 years

	6	1 year \$1000 fine	18 months \$100,000 fine	6 months	3 years	1 year
	Extra-ordinary Risk Crime	1 year \$1000 fine	2 years \$100,000 fine	6 months	4 years	1 year

DL Based on the above, I understand the sentencing range applicable for my crime.

DL (i) I know that the sentence is imposed by the Court. The Court is not bound by any promises made by anyone concerning sentencing. Any promises or agreements made to me with respect to the sentence, that are not set forth in this document, are invalid.

DL (j) I know that by pleading guilty to a felony offense, from this point forward I may not and it will be illegal for me to own, possess, or use any firearms.

DL (k) I understand and agree that by pleading guilty to any criminal offense in this case, if I have a history of any sex offenses or if I have been previously convicted on or after January 1, 1994, of any type of sex-related criminal offense, including attempt, solicitation, and conspiracy to commit a sex-related criminal offense, or if I have been previously convicted on or after July 1, 2000, of any criminal offense, the underlying factual basis of which involved a sex-related criminal offense, I will be required, as part of the pre-sentence investigation by the Probation Department, to submit to a mental health sex-offense specific evaluation, and that I may be required to undergo sex offender treatment to the extent appropriate. I further understand that such sex offender treatment may include therapy, monitoring, and supervision.

DL (l) If applicable, I am aware that I am pleading guilty to a **SEXUAL OFFENSE**. With my lawyer, I have reviewed the attached documents explaining the elements of the charge I am pleading guilty to and the potential penalties for that **sex offense**. I have initialed and signed the attached documents because I thoroughly understand them.

DL (m) I know that if I am pleading guilty to a misdemeanor offense, I may be sentenced to the Denver County Jail for as little as the minimum lawful term or as much as the maximum lawful term. I know the applicable sentencing range for my misdemeanor offense as indicated in the box below is:

MARKED BOX INDICATES APPLICABLE SENTENCING RANGE	MISDEMEANORS COMMITTED ON OR AFTER JULY 1, 1993		
	CLASS	MISDEMEANORS	
		MINIMUM	MAXIMUM
	1	6 MONTHS	18 MONTHS

Exhibit 2

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.

[Signature] Date: 5.11.27
Defendant: DeJane Reaniece Lattany

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.

[Signature] Date: 5-18-23
Defense Counsel: Jason Flores-Williams, Reg. No. 49702

/s/ Daniel T. Brechbuhl Date: 5/1/23
Prosecuting Attorney: Daniel T. Brechbuhl, Reg. No. 31047

Exhibit 3

FSA Time Credit Assessment

Register Number:51090-510, Last Name:LATTANY

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

--- Best Case Scenario - Conditional Pre-release Planning & Preparation Only -----

All conditional days and conditional dates below are the individual's best case scenario given the individual's FSA/FTC status and best case SCA days as of 10-15-2024. These dates can change if there are changes to one or more of the following: the individuals FSA risk, FSA opt-in/opt-out status, or best case SCA days.

SCA DAYS ARE NOT GUARANTEED AND REQUIRE AN INDIVIDUALIZED ASSESSMENT! THEREFORE, IF A DEFAULT OF 365 DAYS IS REFLECTED, THIS DATE IS SUBJECT TO CHANGE BASED ON THE REQUIRED FIVE-FACTOR REVIEW UNDER 18 USC SEC. 3621(B). AN INDIVIDUAL WHO HAS PENDING CHARGES/DETAINEES ARE NOT ELIGIBLE FOR SCA TIME. THE FIVE-FACTOR REVIEW INVOLVES THE FOLLOWING: (1) THE RESOURCES OF THE FACILITY CONTEMPLATED; (2) THE NATURE AND CIRCUMSTANCES OF THE OFFENSE; (3) THE HISTORY AND CHARACTERISTICS OF THE PRISONER; (4) ANY STATEMENT BY THE COURT THAT IMPOSED THE SENTENCE: (a) CONCERNING THE PURPOSES FOR WHICH THE SENTENCE TO IMPRISONMENT WAS DETERMINED TO BE WARRANTED; OR (b) RECOMMENDING A TYPE OF PENAL OR CORRECTIONAL FACILITY AS APPROPRIATE; AND (5) ANY PERTINENT POLICY STATEMENT ISSUED BY THE U.S. SENTENCING COMMISSION.

Projected Release Date: 04-25-2027
Projected Release Method: GCT REL
FSA Projected Release Date: 01-15-2027
FSA Projected Release Method: FSA REL
FSA Conditional Release Date: 04-25-2026
SCA Conditional Placement Days: N/A
SCA Conditional Placement Date: N/A
FSA Conditional Placement Days: N/A
FSA Conditional Placement Date: N/A
Conditional Transition To Community Date: N/A

--- SCA Ineligible -----

--- Detainers

Id	Lodged	Org Authority
001	01-31-2024	SCO COLORADO DOC/ DENVER COUNTY SHERIFF DEPT

DOCUMENTATION OF INFORMAL RESOLUTION ATTEMPT

Mrs. Mallard
Mr. Bishop
Records

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 LATHANY, 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 Mrs. 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.
4. GIVE THIS COMPLETED FORM TO YOUR UNIT COUNSELOR FOR RESPONSE.

TO BE COMPLETED BY STAFF

Date Received by Counselor for Response

6.26.24

Summary of investigation (place response on this form):

I/M Lathany 51090-510 arrived here to FMC Carswell with a Detainer for Colorado Department of Corrections/Denver County Sheriff Department sentence in case number 22CR6134 that was placed on her by FCC Victorville. Colorado sent Victorville paperwork on January 31, 2024, placing the detainer. The paperwork contained a letter and her judgment order instructing the Bureau to place a Detainer on her. The Detainer judgment order stated that she was sentenced to 2 years starting on May 22, 2023, followed by 24 months of mandatory parole required by statute. Verification was made on March 13, 2024, by the Deputy Case Management Coordinator at FCC Victorville with Colorado DOC/Extraditions Operations Coordinator. They stated via email that I/M Lathany 51090-510 must be extradited back to Colorado to be processed for parole. Colorado states that the projected parole termination date is 05-22-2027. Legally the ISM Department cannot remove this Detainer unless instructed to do so in writing (verified) by the agency that place the Detainer, which in this case is Colorado DOC/Denver County Sheriff Department. Therefore, the Detainer will stay in place until Colorado DOC/Denver County Sheriff Department decides to remove it.

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

Contacted R&D

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

3. Time Issued BP 8.5 6.26.24

Unit Team Member: MPH

4. Time Inmate Returned BP 8.5 7.17.24

Unit Team Member: MPH

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



**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/sharif

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 Boy is now
 2 years old and is
 very healthy and
 happy.

EXHIBIT 3

RID:D. 62022CR006134-000044

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 _____

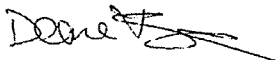
Exhibit 4

DISTRICT COURT, DENVER COUNTY, COLORADO		DATE FILED October 11, 2024
Court Address: 1437 BANNOCK STREET, RM 256, DENVER, CO, 80202		
THE PEOPLE OF THE STATE OF COLORADO v. Defendant(s) DEJANE REANIECE LATTANY		
		⚠ COURT USE ONLY ⚠
		Case Number: 2022CR6134 Division: 5G Courtroom:
Order Denying EMERGENCY MOTION FOR REQUEST FOR A MEETING VIA VIDEO OR TELEPHONE		

The motion/proposed order attached hereto: DENIED.

The Court does not schedule meetings on criminal matters. As noted in a prior order, this Court does not have authority over the Bureau of Prisons and cannot issue any orders regarding the location of incarceration. As there are no pending matters in this case, the Court declines to schedule any hearing dates.

Issue Date: 10/11/2024



DEMETRIA ELIZABETH TRUJILLO
District Court Judge



Exhibit 4

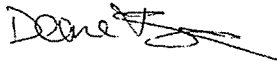
DISTRICT COURT, DENVER COUNTY, COLORADO Court Address: 1437 BANNOCK STREET, RM 256, DENVER, CO, 80202		DATE FILED September 26, 2024 ⚠ COURT USE ONLY ⚠
THE PEOPLE OF THE STATE OF COLORADO v. Defendant(s) DEJANE REANIECE LATTANY		
Case Number: 2022CR6134 Division: 5G Courtroom:		
Order Re: Letter dtd 9/14/24 RE: Defendant's Health w/attach		

The motion/proposed order attached hereto: NO ACTION TAKEN.

The Court has reviewed the foregoing letter.

To the extent Ms. Lattany is seeking relief from circumstances involving the Bureau of Prisons relative to her health issues, this Court does not have jurisdiction to grant any relief.

Issue Date: 9/26/2024



DEMETRIA ELIZABETH TRUJILLO
District Court Judge



Exhibit 4

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

FROM: Lattany, Anezshe
TO: 51090510
SUBJECT: Hey
DATE: 03/11/2024 05:06:06 PM

Hello Ms. Lattany,

I am more than happy to speak with the public defender and/or the case manager to advise that CDOC does not show a detainer in our system for DeJane Lattany. Please feel free to give them my information if necessary.

This is what head of doc wrote her email is jacqueline.sherbo@state.co.us

Chapter 10

GIRLS EMBRACING MOTHERS

The ACLU calls Carswell Federal Medical Center a "hospital of horrors"—and for good reason. Women are sent there with diagnoses requiring urgent medical care and then are routinely denied treatment. Prescriptions are thrown out upon arrival until new tests can be ordered—tests that are often put off for months, at which point the woman's health has declined to the point of no return. Carswell is the only medical facility for women in federal prison, but from the beginning it was obvious the prison hospital was ill-equipped to handle a situation as severe as Genice Stribling's.

Within days of her arrival, the untrained prison aides assigned to help Genice rolled her out of bed incorrectly and broke her ankle. A day later, her toe. They put her in a full-body lift-sling and hoisted her high in the air onto a cot, but didn't fasten the sling correctly; Genice fell out and broke her tailbone. Prison doctors deemed treatment unnecessary, as Genice "couldn't feel it any way." Her body swelled so severely they kept her in a compression brace for twenty-four hours a day, rushing her to an outside hospi-

tal only when the swelling compromised her internal organs. When she was released back to Carswell, medical staff refused to use Genice's method to move her bowels despite their method not working. Utterly dependent on her caregivers, Genice went for weeks without a bowel movement.

"Ms. Stribling," the prison doctor who oversaw her first traumatic months at Carswell leaned over and whispered in her ear, "we cannot care for you here. File the compassionate release paperwork and I'll recommend you for home confinement." But when Genice's attorney reached out to him for the recommendation, something had changed. The doctor just shook his head. "I'm sorry, I can't do it," he said, and refused to comment further. Another doctor quit after three weeks on Genice's unit after unsuccessfully arguing that they couldn't possibly meet her needs. "Nothing they're doing at that prison is ethical," she told a family member later.

Carswell's reputation extended well beyond its walls. "I took an oath. Just being in that place betrayed it," Kathleen Rumpf of the Catholic Workers Association lamented. "I have never seen anything like the corruption and cruelty at Carswell Women's Prison Hospital." A former medical officer at Carswell, Dr. Roger Guthrie, even filed a formal complaint with the U.S. Office of Special Counsel in which he detailed substandard care, medical mistakes, and delays in treatment leading to numerous cases of prisoner death and endangerment. He documented repeated incidences of falsified medical records and documents, the rape and sexual abuse of women prisoners, and misappropriation of funds intended to provide medical care for incarcerated women.

Even the media had found their way to the story. "If I have to stay in here," Genice told one reporter investigating prison hospital conditions, "I'll probably end up dead."

None of this made it any easier for Sharanda, who was halfway across the country from her family, serving her sentence 850 miles away in Tallahassee, Florida. Weasel, housed at Carswell's low-security camp across the street from the medical center, heard of

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: 10/07/2024 07:15:17 AM

To: Dr. Young/Dr. Reynolds
Inmate Work Assignment: Medical idle

goodmorning,

I am also unsure of how i am medically cleared when i never stopped bleeding since coming back from the hospital. According to P.A Smith, i was supposed to have an ultrasound and address the pain in my pelvic area. She also ordered labs showing that i was depleted of nutrients due to no being able to go to the chow hall to eat real meals. My labs probably improved as of friday because some times the inpatients will share their tray if they dont eat it. I am trying to do what i can.

-----LATTANY, DEJANE REANIECE on 10/6/2024 5:53 PM wrote:

>

Hello Dr. Young.

I wanted to let you know that over this weekend, I had a nervous breakdown. I understand that I need to be moved at some point. I have been trying to see if the Medication that Dr. Allison prescribed is working but it is not working. When I leave the unit at any time, my chest pains increase, everything gets blurry and I feel blacked out and I dont know what is going on. I am afraid of this because when I am telling the staff about my chest pains.. its the same way AIC yolanda did who i whitnessed and now she is not alive.

even though I have to be moved for the space, I am willing to be moved.. However, moving at this time scares me because I have not been able to attend chow at all. I have not been able to eat any real meals except when an inmpatient doesnt want their food and they put it in a bowl for me to eat. And I have not also been stabelized. I have lost 20ibs in 2 months... while that seems good, it wasnt done by choice or in a healthy mannor.

I have asked for milk And food to be sent up here temporarily until the medication works and i can atleast go to meal times. Its not all the time that another AIC will help me. and nothing has been done. Ive been ignored.

I was told to eat with the medicine as you know it is hurting my stomach but I am despirately trying to get out of this stuff with my anxiety, depression, fears, chest pains. I have never been this way in my life.

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

↔51090-510↔
Alfred A Arraj
901 19TH ST
Room A105
Denver, CO 80294
United States

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LEGAL mail

FMC Cariswell
P.O. Box 27066
Fort Worth, TX 76127
The enclosed letter was processed through special
mailing procedures for forwarding to you. The letter
has neither been opened nor inspected. If the writer
raises a question or problem over which this facility
has jurisdiction, you may wish to return the material
for further information or clarification. (4)