

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

UNITED STATES DISTRICT COURT
DENVER, COLORADO

Civil Action No.

Gilbert - 25 CV 3699
(To be supplied by the court)

JAN -5 2026

JEFFREY P. COLWELL
CLERK

Dawaane Latiefth II, Plaintiff

v.

Jury Trial requested:
(please check one)
 Yes No

Gilbert Romero

Angela Labenberg

Dennis Heedt

Desirae Rodriguez, Defendant(s).

(List each named defendant on a separate line. If you cannot fit the names of all defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section B. Do not include addresses here.)

PRISONER COMPLAINT

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievances, witness statements, or any other materials to the Clerk's Office with this complaint.

A. PLAINTIFF INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

Dawauna Latiefth II CD# 793443 PO Box 1108 Denver CO 80201
(Name, prisoner identification number, and complete mailing address)

N/A
(Other names by which you have been known)

Indicate whether you are a prisoner or other confined person as follows: (check one)

- Pretrial detainee
- Civilly committed detainee
- Immigration detainee
- Convicted and sentenced state prisoner
- Convicted and sentenced federal prisoner
- Other: (Please explain) Committed to the State hospital

B. DEFENDANT(S) INFORMATION

Please list the following information for each defendant listed in the caption of the complaint. If more space is needed, use extra paper to provide the information requested. The additional pages regarding defendants should be labeled "B. DEFENDANT(S) INFORMATION."

Defendant 1: Gilbert Romero Attorney For CMHHIP
(Name, job title, and complete mailing address)
1600 W 24th St Pueblo CO 81003

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? Yes No (check one). Briefly explain:

he was working for the state of Colorado when he violated my rights

Defendant 1 is being sued in his/her individual and/or official capacity.

Defendant 2: Angela Labenberg Patient Advocate manager
(Name, job title, and complete mailing address)

1600 W 24th St Pueblo CO 81003

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? Yes No (check one). Briefly explain:

She was working for the state of Colorado when she violated my rights

Defendant 2 is being sued in his/her individual and/or official capacity.

Defendant 3: Dennis Heedt Patient Advocate
(Name, job title, and complete mailing address)

1600 W 24th St Pueblo CO 81003

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? Yes No (check one). Briefly explain:

he was working for the state of Colorado when he violated my rights

Defendant 3 is being sued in his/her individual and/or official capacity.

C. JURISDICTION

Indicate the federal legal basis for your claim(s): (check all that apply)

State/Local Official (42 U.S.C. § 1983)

Federal Official

As to the federal official, are you seeking:

Money damages pursuant to *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971)

Declaratory/Injunctive relief pursuant to 28 U.S.C. § 1331, 28 U.S.C. § 1361, or 28 U.S.C. § 2201

Other: (please identify) _____

Attachment to complaint: (I) the Parties to this complaint (B) Defendant

▶ Defendant No. 5

name: Cara Silla

Job: Assistant director of nursing

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Cara.Silla@state.co.us

In her individual and official capacity

▶ Defendant No. 6

name: COLORADO MENTAL HEALTH HOSPITAL IN PUEBLO

Job: Supervisor of the staff of CMHHIP

Address: 1600 W 24th St Pueblo CO 81003

▶ Defendant No. 7

name: STATE OF COLORADO

Job: Supervisor of CMHHIP

Address:

▶ Defendant No. 8

name: Dennis Padilla

Job: Team Coordinator

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Dennis.Padilla@state.co.us

In his individual and official capacity

Attachment to complaint: (I) the Parties to this complaint (B) Defendant

▶ Defendant No. 9

Name: Lenae Brandt

Job: Lead team coordinator

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Lenae.Brandt@state.co.us

In her individual and OFFICIAL capacity

▶ Defendant No. 10

Name: ~~(John)~~ John Musso

Job: Supervisor team coordinator

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: John.Musso@state.co.us

In his individual and OFFICIAL capacity

▶ Defendant No. 11

Name: Amanda Slattery

Job: Nurse Practitioner

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Amanda.Slattery@state.co.us

In her individual and OFFICIAL capacity

Attachment to complaint: (I) the Parties to this complaint (B) Defendant

▶ Defendant No. 12

name: meghan Hastie

Job: nurse Practitioner

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: meghan.Hastie@State.co.us

In her individual and OFFICIAL capacity

▶ Defendant No. 13

name: Dr Hareesh Pillai

Job: Doctor

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Dr Hareesh.Pillai@State.co.us

In his individual and OFFICIAL capacity

▶ Defendant No. 14

name: Jenice Lewis

Job: Social worker

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Jenice.Lewis@State.co.us

In her individual and OFFICIAL capacity

Attachment to complaint: (I) the Parties to this complaint (B) Defendant

▶ Defendant No. 15

name: Kelly Hoy

Job: Social Worker

Address: 1600 W 24th St Pueblo 81003

Telephone No.: 719 546 4000

E-mail address: Kelly.Hoy@state.co.us

In her individual and OFFICIAL capacity

▶ Defendant No. 16

name: Heather Bowen

Job: Lead nurse

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Heather.Bowen@state.co.us

In her individual and OFFICIAL capacity

▶ Defendant No. 17

name: Elizabeth Spence

Job: Team Coordinator

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Elizabeth.Spence@state.co.us

In her individual and OFFICIAL capacity

Attachment to complaint: (I) the Parties to this Complaint (B) Defendant

▶ Defendant No. 18

name: Sara Ackerman

Job: Nurse Practitioner

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Sara.Ackerman@state.co.us

In her individual and OFFICIAL capacity

▶ Defendant No. 19

name: Feerlyn Whitaker

Job Lead nurse

Address: 1600 W 24th St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Feerlyn.Whitaker@state.co.us

In her individual and OFFICIAL capacity

▶ Defendant No. 20

name: Caitlin Keeley

Job: Nurse Practitioner

Address: 1600 W 24th St Pueblo CO 81003

Telephone No. 719 546 4000

E-mail address Caitlin.Keeley@state.co.us

In her individual and OFFICIAL capacity

▶ Defendant No 21
name : Shawna Armstrong
job : Lead nurse
Address : 1600 W 24th St Pueblo Co 81003
Telephone No. : 719 546 4000
E-mail address : Shawna.Armstrong@state.co.us
In her individual and OFFICIAL Capacity

▶ Defendant No 22
name : Vanessa Farmer
job : Charge nurse
Address : 1600 W 24th St Pueblo CO 81003
Telephone No : 719 546 4000
E-mail address : ~~Shawna.Armstrong~~ Vanessa.Farmer@state.co.us
In her individual and OFFICIAL Capacity

▶ Defendant No 23
name : Sheila Jimenez
job : Social worker
Address : 1600 W 24th St Pueblo CO 81003
Telephone No : 719 546 4000
Email address : Sheily.Jimenez@state.co.us
In her individual and OFFICIAL Capacity

▶ Defendant No 24
name : Desirae Rodriguez
job : Patient Advocate
Address : 1600 W 24th St Pueblo CO 81003
Telephone No : 719 546 4000
Email address : Desirae.Rodriguez@state.co.us

Attachment to Complaint: II Basis For Jurisdiction (D)

- 1- Defendant Gilbert Romero, was working for the state of Colorado when he violated my Federal constitutional and statutory rights
- 2- Defendant Angela Labenberg, was working for the state of Colorado when she violated my Federal constitutional and statutory rights
- 3- Defendant Dennis Heedt, was working for the state of Colorado when he violated my Federal constitutional and statutory rights
- 4- Desirae Rodriguez Defendant, was working for the state of Colorado when she violated my Federal constitutional and statutory rights
- 5- Defendant Cara Silla, was working for the state of Colorado when she violated my Federal constitutional and statutory rights
- 6- Defendant COLORADO MENTAL HEALTH HOSPITAL IN PUEBLO
it is a corporation operated under the law of the state of Colorado when it violated my Federal constitutional and statutory rights

Attachment to Complaint: II Basis For Jurisdiction (D)

7- Defendant STATE OF COLORADO it is a corporation operated under the laws of the State of Colorado. When it violated my Federal constitutional and Statutory rights.

8- Defendant Dennis Padilla, was working For the State of Colorado when he violated my Federal Constitutional and Statutory rights.

9- Defendant Lenae Brandt, was working For the state of Colorado when she violated my Federal Constitutional and Statutory rights.

10- Defendant John Musso, was working For the State of Colorado when he violated my Federal Constitutional and Statutory rights.

11- Defendant Amanda Slattery, was working For the State of Colorado when she violated my Federal Constitutional and Statutory rights.

12- Defendant Meagan Hastie was working For the State of Colorado when she violated my Federal Constitutional and Statutory rights.

Attachment to Complaint : II Basis For Jurisdiction (D)

- 13- Defendant Dr Hareesh Pillai, was working For the State OF Colorado when he violated my Federal Constitutional and Statutory rights
- 14- Defendant Jenice Lewis, was working For the State OF Colorado when she violated my Federal Constitutional and Statutory rights
- 15- Defendant Kelly Hoy, was working For the State OF Colorado when she violated my Federal Constitutional rights and Statutory rights
- 16- Defendant Heather Bowen, was working For the State OF Colorado when she violated my Federal Constitutional and Statutory rights
- 17- Defendant Elizabeth Spence, was working For the State OF Colorado when she violated my Federal Constitutional and Statutory rights
- 18- Defendant Sara Ackerman, was working For the State OF Colorado when she violated my Federal Constitutional and Statutory rights
- 19- Defendant Feerlyn Whitaker, was working For the State OF Colorado when she violated my Federal Constitutional and Statutory rights

Attachment to Complaint: II Basis For Jurisdiction (D)

- 20 Defendant Caitlin Keeley, was working for the State of Colorado when she violated my Federal Constitutional and Statutory rights
- 21 Defendant Shawna Armstrong, was working for the State of Colorado when she violated my Federal Constitutional and Statutory rights
- 22 Defendant Vanessa Farmer, was working for the State of Colorado when she violated my Federal Constitutional and Statutory rights
- 23 Defendant Sheila Jimenez, was working for the State of Colorado when she violated my Federal Constitutional and Statutory rights

D. Statement of Claims

Count One Denial of Access to Court

- ▶ 1- Defendant Gilbert Romero, on 9/3/24 Under Color of Law at 1600 W 24th St Pueblo CO 81003, in unite L-1 Feloniously, Want Only, willfully and knowingly, had denied me legal assistance, and legal access to court by refusing to provided me with legal citation that I needed to prove my case in action No. 22cv01874 RM KAS in the United State District court Causing legal injuries and monetary losses, because of my case been dismiss For not complying with the court orders. This constitute in obstruction of justice and Denial of access to court and the violation of my Due Process of Law under the 1st and 14th amendments to the United State Constitution
- ▶ 2- Defendant Gilbert Romero continue to refuse to provide legal assistance to Plaintiff Dawuane Latiefth II by providing sometime the wrong documentation requested with delay and other time not providing anything at all. Defendant Gilbert Romero actions violated Plaintiff Dawuane Latiefth II rights under 1st and 14th amendment to the United State constitution and had cause Plaintiff Dawuane Latiefth II legal injuries and monetary damage or losses
- ▶ 3- By witnessing defendant Gilber Romero illegal actions and failing to correct that misconduct and encouraging the continuation of the misconduct, Defendant Angela Lubenberg is also violating Plaintiff Dawuane Latiefth II rights under 1st and 14th amendment

to the United State constitution and causing Plaintiff Dawanne Latiefth II legal injurys and monetary losses.

▶ 4 - By witnessing defendant Gilbert Romero illegal actions and failing to correct that misconduct and encouraging the continuation of misconduct, Defendant Dennis Heedt is also violating Plaintiff Dawanne Latiefth II rights under 1st and 14th amendmends to the United State constitution and causing Plaintiff Dawanne Latiefth II legal injurys and monetary losses.

▶ 5 - By witnessing defendant Gilbert Romero illegal actions and failing to correct that misconduct and encouraging the continuation of the misconduct, defendant Desirae Rodriguez is also violating Plaintiff Dawanne Latiefth II rights under 1st and 14th amendmends to the United State constitution and causing Plaintiff Dawanne Latiefth II legal injurys and monetary losses.

▶ 6 - By retaliating against Plaintiff Dawanne Latiefth II by not providing legal assistance and legal access to court for exercising his legal right to complain through the use of CMHHIP grievance system, defendant Gilbert Romero did violated Plaintiff Dawanne Latiefth II rights under the 1st amendmend and 14th amendmend to the United State constitution. Unlawfully, willfully and knowingly.

- 7- By witnessing defendant Gilbert Romero illegal actions and failing to correct that misconduct and encouraging the continuation of the misconduct, defendant COLORADO MENTAL Health HOSPITAL IN PUEBLO is also violating Plaintiff Dawuane Latiefth II rights under 1st and 14th amendmends to the United State constitution and causing Plaintiff Dawuane Latiefth II legal injuries and monetary losses.
- 8- Defendant COLORADO MENTAL HEALTH HOSPITAL IN PUEBLO is the supervisor of all staff of CMHHIP Defendants in this complaint and was well informed of this violation of Plaintiff Dawuane Latiefth II, Patient, Federal constitutional and Statutory rights by my grievances file through the system of CMHHIP; which violation were committed by it subordinated, but fail to intervene and take action. Defendant COLORADO MENTAL HEALTH HOSPITAL IN PUEBLO are liable for the violation of Plaintiff Dawuane Latiefth II rights under 1st and 14th amendment to the united state constitution by virtue of it own condut and state of mind that cause dismissal of Plaintiff civil action and monetary losses.
- 9- Defendant STATE OF COLORADO is the supervisor of CMHHIP defendant in this complaint and should had been informed of those violation of Plaintiff Dawuane Latiefth II Patient Federal constitutional and statutory rights by my grievances in file through the system of CMHHIP which violations were

committed by its subordinate but fail to intervene and take action. Defendant STATE OF COLORADO are liable for the violation of Plaintiff Dawane Latiefth II rights under 1st and 14th amendments to the United State constitution by virtue of its own conduct and state of mind that cause dismissal of Plaintiff civil action and monetary losses.

COUNT TWO Denial of access to court

10- Defendant Amanda Slattery on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in Unit E-1, Feloniously, Wantonly, Will Fully and Knowingly had denied me Plaintiff Dawane Latiefth II access to make legal photocopies and in helping in the preparation of legal and personal correspondence by making a teamate decision to tell their subordinate not to make or help me Plaintiff Dawane Latiefth II in making legal photocopies and legal and personal correspondence this constitute in obstruction of justice 18 U.S.C 242 and the violation of my Due Process of Law and access to court under the 1st and 14th amendment to the United State constitution causing legal injuries, delay on filing legal document, dismissal of civil action and prevention in filing any new complaints

11 - Defendant Dennis Padilla on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1 Feloniously, Wantonly, will Fully and Knowingly had denied me Plaintiff Dawaune Latiefth II access to make legal Photocopys and in helping in the preparation of legal and personal correspondance by making a teamate decision to tell thier subordinates not to make or help me Plaintiff Dawaune Latiefth II in making legal Photocopys and legal and personal correspondance this constitute in obstruction of justice 18 U.S.C 242 and the violation of my due Process of Law and access to court under the 1st and 14th amendment to the United States Constitution causing legal injuries, delay on Filing legal documents, dismissal of civil action and prerention in Filing any new complaints

12 - Defendant Lenae Brandt on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1 Feloniously, Wantonly, will Fully and Knowingly had denied me Plaintiff Dawaune Latiefth II access to make legal Photocopys and in helping in the preparation of legal and personal correspondance by making a teamate decision to tell thier subordinates not to make or help me Plaintiff Dawaune Latiefth II in making legal Photocopys and legal and personal correspondance this constitute in obstruction of justice 18 U.S.C 242 and the violation of my due Process of Law and access to court under the 1st and 14th amendment to the United State Constitution causing legal injuries, delay on Filing legal document, dismissal of civil action and preventing in Filing any new complaints

13- Defendant John Musso on 1/25/23 under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1 Feloniously, Wantonly, Will Fully and Knowingly had denied me Plaintiff Dawuane Latiefth II access to make legal photocopies and in helping in the preparation of legal and personal correspondance by making a teamate decision to tell thier subordinate not to make or help me Plaintiff Dawuane Latiefth II in making legal photocopies and legal and personal correspondance this constitute in obstruction of justice 18 U.S.C 242 and the violation of my due process of law and access to court under the 1st and 14th amendmen to the United States Constitution causing legal injurys, delay on filing legal documents, dismissal of civil action and prerention in filing any new complaints

14- Defendant Meagan Hastie on 1/25/23 under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1 Feloniously, Wantonly, Will Fully and Knowingly had denied me Plaintiff Dawuane Latiefth II access to make legal photocopies and in helping in the preparation of legal and personal correspondance by making a teamate decision to tell thier subordinate not to make or help me Plaintiff Dawuane Latiefth II in making legal photocopies and legal and personal correspondance this constitute in obstruction of justice 18 U.S.C 242 and the violation of my due process of law and access to court under the 1st and 14th amendmen to the United State Constitution causing legal injuries, delay on filing legal document, dismissal of civil action and preventing in filing any new complaints

15- Defendant Dr Hareesh Pillai on 1/25/23 under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1 Feloniously, Wantonly, Will Fully and Knowingly had denied me Plaintiff Dawanne Latiefth II access to make legal photocopies and in helping in the preparation of legal and personal correspondance by making a teamate decision to tell thier subordinate not to make or help me Plaintiff Dawanne Latiefth II in making legal photocopies and legal and personal correspondance this constitute in obstruction of justice 18 U.S.C 242 and the violation of my due process of law and access to court under the 1st and 14th amendmen to the United States Constitution causing legal injurys, delay on filing legal documents, dismissal of civil action and prevention in filing any new complaints

16- Defendant Jenice Lewis on 1/25/23 under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1 Feloniously, Wantonly, Will Fully and Knowingly had denied me Plaintiff Dawanne Latiefth II access to make legal photocopies and in helping in the preparation of legal and personal correspondance by making a teamate decision to tell thier subordinates not to make or help me Plaintiff Dawanne Latiefth II in making legal photocopies and legal and personal correspondance this constitute in obstruction of justice 18 U.S.C 242 and the violation of my due process of law and access to court under the 1st and 14th amendmen to the United State Constitution causing legal injuries, delay on filing legal document, dismissal of civil action and preventing in filing any new complaints

▶ 17- Defendant Kelly Hoy on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1 Feloniously, Wantonly, Will Fully and Knowingly had denied me Plaintiff Dawuane Latiefth II access to make legal photocopies and in helping in the preparation of legal and personal correspondance by making a teamate decision to tell thier subordinate not to make or help me Plaintiff Dawuane Latiefth II in making legal photocopies and legal and personal correspondance this constitute in obstruction of justice 18 U.S.C 242 and the violation of my due process of law and access to court under the 1st and 14th amendmen to the United States Constitution causing legal injerys, delay on filing legal documents, dismissal of civil action and prerention in filing any new complaints

18- Defendant Heather Bowen on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1 Feloniously, Wantonly, Will Fully and Knowingly had denied me Plaintiff Dawuane Latiefth II access to make legal photocopies and in helping in the preparation of legal and personal correspondance by making a teamate decision to tell thier Subordinates not to make or help me Plaintiff Dawuane Latiefth II in making legal photocopies and legal and personal correspondance this constitute in obstruction of justice 18 U.S.C 242 and the violation of my due process of law and access to court under the 1st and 14th amendmen to the United State Constitution causing legal injuries, delay on filing legal document, dismissal of civil action and preventing in filing any new complaints

19 - By witnessing defendants Dennis Padilla, Lanae Brandt, John Musso, Amanda Slattery, Meagan Hastie, Dr Hareesh Pillai, Jenice Lewis, Kelly Hoy, Heather Bowen, illegal actions and Failing to correct that misconduct and encouraging the continuation of misconduct, defendant Cara Silla is also violating Plaintiff Dawanne Latiefth II rights under 1st and 14th amend ment to the ~~State~~ or United State constitution and causing Plaintiff Dawanne Latiefth II legal injuries and monetary losses.

20 - By witnessing defendants Dennis Padilla, Lanae Brandt, John Musso, Amanda Slattery, Meagan Hastie, Dr Hareesh Pillai, Jenice Lewis, Kelly Hoy, Heather Bowen, illegal actions and Failing to correct that misconduct and encouraging the continuation of misconduct defendants Angela Labenberg, Dennis Heedt and Desirae Rodriguez are also violating Plaintiff Dawanne Latiefth II rights under 1st and 14th amendment to the United State constitution and causing Plaintiff Dawanne Latiefth II legal injuries and monetary losses

21 - By retaliating against Plaintiff Dawanne Latiefth II, by not allowing him or helping him make legal Photocopys and prepare legal and personal correspondance, For exercising his legal right to complain through the use of CMHHIP grievance SYSTEM against defendants, defendants, Dennis Padilla, Lanae Brandt, John Musso, Amanda Slattery, Meagan Hastie, Dr Hareesh Pillai, Jenice Lewis, Kelly Hoy, Heather Bowen, illegal actions and Failing to correct that misconduct and encouraging the continuation of misconduct are violating Plaintiff Dawanne Latiefth II rights under 1st and 14th amendment

to the United State constitution and causing legal, injuries, and monetary losses.

22 - Defendant COLORADO MENTAL HEALTH HOSPITAL IN PUEBLO

It is the supervisor of all staff of CMHHIP Defendants in this complaint and was well informed of this violation of Plaintiff Dawanne Latiefth II, Patient, Federal constitutional and statutory rights by my grievances file through the system of CMHHIP; which violation were committed by it subordinated, but fail to intervene and take action. Defendant Colorado mental health hospital in Pueblo are liable for the violation of Plaintiff Dawanne Latiefth II rights under 1st and 14th amendment to the United State constitution by virtue of it own conduct and state of mind that cause dismissal of Plaintiff Dawanne Latiefth II rights, actions under 1st and 14th amendment to the United State and monetary losses

23 - Defendant State of Colorado it is the supervisor of all staff of CMHHIP and CMHHIP it self which are the defendants mentioned in this complaint and should had been inform of those violation of Plaintiff Dawanne Latiefth II Patient, Federal constitutional and statutory rights by my grievances in file through the system of CMHHIP which violations were committed by it subordinates but fail to intervene and take action. Defendant State of Colorado it is liable for the violation of Plaintiff Dawanne Latiefth II rights under 1st and 14th amendment to the United State Constitution by virtue of it own conduct and state of mind that cause dismissal of Plaintiff Dawanne Latiefth II civil actions and monetary losses.

Count three: denial of access to court?

24 - Defendant Dennis Padilla on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unit E-1 Feloniously, Wantonly, Willfully and Knowingly had block the Phone number to the United State district court denying me access to court causing obstruction for me to initiate or present my civil actions, which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of Law right to access to court under the 1st and 14th amendment to the United State constitution causing legal injuries.

25 - Defendant Lenae Brundt on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unit E-1, Feloniously, Wantonly, Willfully and Knowingly had block the Phone number to the United State district court denying me access to court causing obstruction for me to initiate or present my civil actions, which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of Law right to access to court under the 1st and 14th amendment to the United State constitution causing legal injuries.

Count three: Obstruction of Justice

26-Defendant John Musso on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unit E-1 Feloniously, Wantonly, Willfully and Knowingly had block the Phone number to the United State district court denying me access to court causing obstruction for me to initiate or present my civil actions, which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of Law right to access to court under the 1st and 14th amendment to the United State constitution causing legal injuries.

27-Defendant Amanda Slattery on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unit E-1, Feloniously, Wantonly, Willfully and Knowingly had block the Phone number to the United state district court denying me access to court causing obstruction for me to initiate or present my civil actions, which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 U.S.C 242 and the violation of my Due Process of Law right to access to court under the 1st and 14th amendment to the United state constitution causing legal injuries.

Count three: obstruction of justice

▶ 28- Defendant Meagan Hastie on 1/25/23 under color of law at 1600 W 24th St Pueblo CO 81003 in Unit E-1 Feloniously, Wantonly, Willfully and Knowingly had block the Phone number to the United State district court denying me access to court causing obstruction for me to initiate or present my civil actions, which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of Law right to access to court under the 1st and 14th amendment to the United State constitution causing legal injuries.

▶ 29- Defendant Dr Haveesh Pillai on 1/25/23 under color of law at 1600 W 24th St Pueblo CO 81003 in Unit E-1, Feloniously, Wantonly, Willfully and Knowingly had block the Phone number to the United state district court denying me access to court causing obstruction for me to initiate or present my civil actions, which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of Law right to access to court under the 1st and 14th amendment to the United state constitution causing legal injuries.

Count three: Obstruction of justice

▶ 30-Defendant Jenice Lewis on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unit E-1 Feloniously, Wantonly, Willfully and Knowingly had block the Phone number to the United State district court denying me access to court causing obstruction for me to initiate or present my civil actions, which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of Law right to access to court under the 1st and 14th amendment to the United State constitution causing legal injuries.

▶ 31-Defendant Kelly Hoy on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unit E-1, Feloniously, Wantonly, Willfully and Knowingly had block the Phone number to the United State district court denying me access to court causing obstruction for me to initiate or present my civil actions, which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of Law right to access to court under the 1st and 14th amendment to the United State constitution causing legal injuries.

Count three obstruction of justice

▶ 32-Defendant Heather Bowen on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1 Feloniously, Wantonly Willfully and Knowingly had block the Phone number to the United State district court denying me access to court causing obstruction for me to initiate or present my civil actions, which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of Law right to access to court under the 1st and 14th amendment to the United State constitution causing legal injuries.

▶ 33-Defendant Cara Silla on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1, Feloniously, Wantonly, Willfully and Knowingly had block the Phone number to the United state district court denying me access to court causing obstruction for me to initiate or present my civil actions, which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 U.S.C 242 and the violation of my Due Process of Law right to access to court under the 1st and 14th amendment to the United state constitution causing legal injuries.

- ▶ 34- Defendant Amanda Slattery on 1/25/25 under color of law at 1600 W 24th St Pueblo CO 81003 in Unit E-1, Feloniously, Wantonly Will Fully and Knowingly had block the Phone number to the United State district court denying me access to court causing obstruction in order for me to initiate or present my civil action which cause legal injuries by dismissal of my civil actions this constitute in obstruction of justice 18 U.S.C 242 and the violation of my Due process of Law right to access to court under the 1st and 14th amendment The United State constitution causing legal injuries.
- ▶ 35- By witnessing defendants Dennis Padilla, Lanae Brandt, John Musso Amanda Slattery, meagan Hastie, Dr Hareesh Pillai, Jenice Lewis Kelly Hoy, Heather Bowen, illegal action and Failing to correct that misconduct and encouraging the continuation of misconduct Defendant's Angela Labenberg, Dennis Heedt and Desirae Rodriguez are also violating Plaintiff Dawanne Latiefth II rights Under the 1st and 14th amendment to the United State constitution causing Plaintiff Dawanne Latiefth II legal injuries and monetary damages or losses.
- ▶ 36- By retaliating against Plaintiff Dawanne Latiefth II by blocking the Phone number to the United State District Court, For Plaintiff Dawanne Latiefth II exercising his legal right to complain through the use of CMHIP grievance system against defendants, defendants Dennis or Dennis Padilla, Lanae Brandt, John Musso, Amanda Slattery, meagan Hastie, Dr Hareesh Pillai, Jenice Lewis Kelly Hoy, Heather Bowen, illegal actions and Failing to

Correct that misconduct are violating Plaintiff Dawane Laticeth II rights under 1st and 14th amendment to the United State constitution

▶ 37 - Defendant Colorado Mental Health Hospital in Pueblo it is the Supervisor of all staff of CMHHIP Defendants in this complaint and was well informed of this violation of Plaintiff Dawane Laticeth II Patient, Federal constitutional and statutory rights by my grievances file through the system of CMHHIP, which the violation were committed by it subordinated but fail to intervene and take action. Defendant Colorado mental health hospital in Pueblo are liable for the violation of Plaintiff Dawane Laticeth II rights under 1st and 14th amendment to the United State constitution by virtue of it own conduct and state of mind that cause dismissal of Plaintiff Dawane Laticeth II rights actions in the civil courts

▶ 38 - Defendant State of Colorado it is the supervisor of CMHHIP and should had been informed of those violation of Plaintiff Dawane Laticeth II Patient, Federal constitutional and statutory right by my grievance in file through the system of CMHHIP which violation were committed by it's subordinate but fail to intervene and take action. Defendant State of Colorado it is liable for the violation of Plaintiff Dawane Laticeth II rights under 1st and 14th amendment to the United State constitution by virtue of it own conduct and state of mind that cause dismissal of Plaintiff Dawane Laticeth II civil action and monetary losses

Count Four: Tampering with US mail

- ▶ 39 - Defendant Sara Ackerman on 6/16/24, Under color of law at 1600 W 24th St Pueblo CO 81003 in unite J-2, Feloniously Wantonly, willfully, knowingly had tamper with my mail or correspondence by opening first my out going legal mail and refuse to mail my correspondence causing delay; and opening my incoming mail or legal mail, without me been present and delaying or withholding it From me plaintiff Dawanne Lutieff II causing delay in my correspondence and invading my Privacy and obstructing justice which had cause me Plaintiff emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution
- ▶ 40 - Defendant Feerlyn Whitaker on 6/16/24 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite J2, Feloniously, Wantonly Willfully, knowingly had tamper with my mail or correspondence by opening first my out going mail and refuse to mail my legal correspondence causing delay, and opening my incoming legal mail without me been present and delaying my mail and withholding it causing delay in my correspondence and invading my Privacy and obstructing justice which had cause me Plaintiff Lutieff II, Emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

Count Four Tampering with US mail

- ▶ 41 - Defendant Dennis Padilla on 1/18/24 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1, Feloniously, Wantonly, willfully, knowingly had tamper with my mail or correspondance by opening First my outgoing legal mail and refuse to mail my correspondance causing delay; and opening my incoming mail or legal mail, without me been present and delaying or withholding it From me plaintiff Dawanne LutieFFh II causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution
- ▶ 42 - Defendant Lenae Brandt on 1/18/24 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1, Feloniously, Wantonly, Willfully, knowingly had tamper with my mail or correspondance by opening First my outgoing mail and refuse to mail my legal correspondance causing delay, and opening my incoming legal mail without me been present and delaying my mail and withholding it causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff LutieFFh II, Emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

Count Four Tampering with US mail

- ▶ 43 - Defendant John Musso on 1/18/25 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1, Feloniously Wantonly, willfully, knowingly had tamper with my mail or correspondance by opening First my out going legal mail and refuse to mail my correspondance causing delay; and opening my incoming mail or legal mail, without me been present and delaying or withholding it From me plaintiff Dawanne Lutieff II causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution
- ▶ 44 - Defendant Amanda Slattery on 1/18/25 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite E1, Feloniously, Wantonly Willfully, knowingly had tamper with my mail or correspondance by opening First my outgoing mail and refuse to mail my legal correspondance causing delay, and opening my incoming legal mail without me been present and delaying my mail and withholding it causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff Lutieff II, Emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

Count Four: Tampering with US mail

- ▶ 45 - Defendant Meagan Hastie on 1/18/25 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1 Feloniously Wantonly, willfully, knowingly had tamper with my mail or correspondance by opening first my out going legal mail and refuse to mail my correspondance causing delay; and opening my incoming mail or legal mail, without me been present and delaying or withholding it From me plaintiff Dawanne Lutieff II causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution
- ▶ 46 - Defendant Dr Hareesh Pillai on 1/18/25 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite E1, Feloniously, Wantonly Willfully, knowingly had tamper with my mail or correspondance by opening first my out going mail and refuse to mail my legal correspondance causing delay, and opening my incoming legal mail without me been present and delaying my mail and withholding it causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff Lutieff II, emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

Count Four: Tampering with US mail

▶ 47 - Defendant Jenice Lewis on 1/18/25 Under color of law at 1600 W 24th St Pueblo CO 81003 in Unit E-1, Feloniously, Wantonly, Willfully, Knowingly had tamper with my mail or correspondence by opening first my outgoing legal mail and refuse to mail my correspondence causing delay; and opening my incoming mail or legal mail, without me been present and delaying or withholding it from me plaintiff Dawanne Lutieff II causing delay in my correspondence and invading my privacy and obstructing justice which had cause me plaintiff emotional distress and psychological damage this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

▶ 48 Defendant Kelly Hoy on 1/18/25 Under color of law at 1600 W 24th St Pueblo CO 81003 in Unit E-1, Feloniously, Wantonly, Willfully, Knowingly had tamper with my mail or correspondence by opening first my outgoing mail and refuse to mail my legal correspondence causing delay, and opening my incoming legal mail without me been present and delaying my mail and withholding it causing delay in my correspondence and invading my privacy and obstructing justice which had cause me plaintiff Lutieff II, emotional distress and psychological damage this constitute in obstruction of justice 18 USC 242 and violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

Count Four: Tampering with US mail

▶ 49 - Defendant Heather Bowen on 1/18/25, Under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1, Feloniously, Wantonly, willfully, Knowingly had tamper with my mail or correspondance by opening First my outgoing legal mail and refuse to mail my correspondance causing delay; and opening my incoming mail or legal mail, without me been present and delaying or withholding it From me plaintiff Dawanne LatieFFh II causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

▶ 50 - Defendant Cara Silla on 1/18/25 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite E-1, Feloniously, Wantonly Willfully, Knowingly had tamper with my mail or correspondance by opening First my outgoing mail and refuse to mail my legal correspondance causing delay, and opening my incoming legal mail without me been present and delaying my mail and withholding it causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff LatieFFh II, Emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

51 - By witness in defendants Dennis Padilla, Lanae Brandt, John Musso, Amanda Slattery, Meagan Hastie, Dr. Hareesh Pillai, Jenice Lewis, Kelly Hoy, Heather Bowen, illegal actions and failing to correct that misconduct and encouraging the continuation of misconduct. Defendants Cara Silla, Angela Labenberg, Dennis Heedt and Desirae Rodriguez are also violating Plaintiff Dawuane Latiefth II rights under the 1st and 14th amendment to the United States Constitution causing Plaintiff Dawuane Latiefth II legal injuries.

52 - By retaliating against Plaintiff Dawuane Latiefth II by tampering with Plaintiff Latiefth II mail, destroying and not mailing the correspondence for Plaintiff Latiefth II exercising his legal right to complain through the use of CMHIP grievance system against defendant; Defendant Dennis Padilla, Lanae Brandt, John Musso, Amanda Slattery, Meagan Hastie, Dr. Hareesh Pillai, Jenice Lewis, Kelly Hoy, Heather Bowen, illegal actions and failing to correct that misconduct are violating Plaintiff Dawuane Latiefth II right under 1st and 14th amendment to the United States Constitution.

53- Defendant Colorado mental Health Hospital in Pueblo it is the supervisor of all staff of CMHHIP Defendant in this complaint and was well informed of this violation of Plaintiff Dawanne Latiefth II Patient, Federal constitutional and Statutory right by my grievance file through the system of CMHHIP which the violation were committed by its subordinate but fail to intervene and take action. Defendant Colorado mental health hospital in Pueblo are liable for the violation of Plaintiff Dawanne Latiefth II right under 1st and 14th amendment to the United State constitution by virtue of its own conduct and state of mind that cause dismissal of Plaintiff Dawanne Latiefth II right actions in the civil courts.

54- Defendant STATE OF COLORADO it is the supervisor of CMHHIP and should had been informed of those violation of Plaintiff Dawanne Latiefth II Patient, Federal constitutional and Statutory right by my grievance in file through the system of CMHHIP which violation were committed by its subordinate but fail to intervene and take action. Defendant STATE OF Colorado it is liable for the violation of Plaintiff Dawanne Latiefth II rights under 1st and 14th amendment to the United state constitution by virtue of its own conduct and state of mind that cause dismissal of Plaintiff Dawanne Latiefth II civil action and monetary losses.

Count Four : Tampering with us mail

▶ 35-Defendant Caitlin Keeley on 1/18/25 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite Feloniously Wantonly, willfully, knowingly had tamper with my mail or correspondance by opening First my outgoing legal mail and refuse to mail my correspondance causing delay; and opening my incoming mail or legal mail, without me been present and delaying or withholding it From me plaintiff Dawanne LutieFFh II causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

▶ 36-Defendant Shawna Armstrong on 1/18/25 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite Feloniously, Wantonly Willfully, knowingly had tamper with my mail or correspondance by opening First my outgoing mail and refuse to mail my legal correspondance causing delay, and opening my incoming legal mail without me been present and delaying my mail and withholding it causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff LutieFFh II, emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

Count Four Tampering with US mail

- ▶ 57 - Defendant Vanessa Farmer on 1/19/23 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite Feloniously Wantonly, Willfully, Knowingly had tamper with my mail or correspondance by opening First my out going legal mail and refuse to mail my correspondance causing delay; and opening my incoming mail or legal mail, without me been present and delaying or withholding it From me plaintiff Dawanne Lutieff II causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and the violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution
- ▶ 58 - Defendant Sheila Jimenez on 1/19/23 Under color of law at 1600 W 24th St Pueblo CO 81003 in unite Feloniously, Wantonly Willfully, Knowingly had tamper with my mail or correspondance by opening First my out going mail and refuse to mail my legal correspondance causing delay, and opening my incoming legal mail without me been present and delaying my mail and withholding it causing delay in my correspondance and invading my Privacy and obstructing justice which had cause me Plaintiff Lutieff II, emotional distress and Psychological damage this constitute in obstruction of justice 18 USC 242 and violation of my Due Process of law right to access to court under the 1st and 14th amendment to the united state constitution

59- Plaintiff Dawuane Latiefth II has no plain adequate or complete remedy at law to redress the wrongs describe herein, Plaintiff Dawuane Latiefth II has been and will continue to be irreparably injured by the conduct of those defendant mentioned in this complaint, unless this court grant declaratory and injunctive relief which Plaintiff Latiefth II seeks

D. STATEMENT OF CLAIM(S)

State clearly and concisely every claim that you are asserting in this action. For each claim, specify the right that allegedly has been violated and state all facts that support your claim, including the date(s) on which the incident(s) occurred, the name(s) of the specific person(s) involved in each claim, and the specific facts that show how each person was involved in each claim. You do not need to cite specific legal cases to support your claim(s). If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "D. STATEMENT OF CLAIMS."

CLAIM ONE: Please see attachment

Claim one is asserted against these Defendant(s):

Supporting facts:

~~Case No. 1:25-cv-03699-RTG Document 10 filed 01/05/26 USDC Colorado pg 43~~

E. PREVIOUS LAWSUITS

Have you ever filed a lawsuit, other than this lawsuit, in any federal or state court while you were incarcerated? Yes No (check one).

If your answer is "Yes," complete this section of the form. If you have filed more than one previous lawsuit, use additional paper to provide the requested information for each previous lawsuit. Please indicate that additional paper is attached and label the additional pages regarding previous lawsuits as "E. PREVIOUS LAWSUITS."

Name(s) of defendant(s): _____

Docket number and court: _____

Claims raised: _____

Disposition: (is the case still pending? has it been dismissed?; was relief granted?) _____

Reasons for dismissal, if dismissed: _____

Result on appeal, if appealed: _____

F. ADMINISTRATIVE REMEDIES

WARNING: Prisoners must exhaust administrative remedies before filing an action in federal court regarding prison conditions. See 42 U.S.C. § 1997e(a). Your case may be dismissed or judgment entered against you if you have not exhausted administrative remedies.

Is there a formal grievance procedure at the institution in which you are confined?

Yes No (check one)

Did you exhaust administrative remedies?

Yes No (check one)

Attachment

Relief

Wherefore, Plaintiff Dawanne Latiefth II, respectfully prays that this court enter judgement granting Plaintiff Latiefth II:

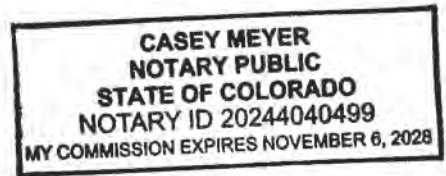
- A declaration that the act and omission describe here in violated Plaintiff Dawanne Latiefth II rights under the constitution and laws of the United State
- A preliminary and permanent injunction ordering defendant's
 - to have a adequate Law library, west Law is preferred on a Computer
 - to have a better mail system to ensure that mail is not delay
 - to pay for postage for any legal mail directed to any government entit
 - to allow all legal calls in general
 - and finally not to prevent or obstruct any of the above and not to open the mail of the patient without them been present
- Compensatory damage in the amount of \$ 750,000.00 against each defendant jointly and severally
- Punitive damage in the amount of \$ 750,000.00- against each defendant and the amount of \$ 750,000.00- against defendant STATE OF COLORADO and defendant COLORADO MENTAL HEALTH HOSPITAL IN PUEBLO
- A Jury Trial on all issues triable by Jury additional relief this court deems just proper and equitable
- Emotional damage in the amount of \$ 750,000.00- against each defendant
- Psychological damage in the amount of \$ 750,000.00 against each defendant

G. REQUEST FOR RELIEF

State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "G. REQUEST FOR RELIEF."

Please see attachment

Notary: Casey Meyer
CU
Date: 12/30/23



H. PLAINTIFF'S SIGNATURE

I declare under penalty of perjury that I am the plaintiff in this action, that I have read this complaint, and that the information in this complaint is true and correct. See 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nontrivial argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

Dawaine Ellis II
(Plaintiff's signature)

12-30-23
(Date)

Dawaine Latief II, declare under penalty of perjury that I am the plaintiff in this action that I have read this complaint and that the information in this complaint is true and correct see 28 USC § 1746 18 U.S.C § 1621 G

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Dawaune Laticoff II # 793443
PO Box 1108
Denver CO 80201

United State District Court
901 - 19st St
Denver CO 80294

Legal mail

