

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

**FILED**  
UNITED STATES DISTRICT COURT  
DENVER, COLORADO

Civil Action No. 25 CV 3700  
(To be supplied by the court)

**JAN -5 2026**  
**JEFFREY P. COLWELL**  
CLERK

Dawaune Latiefth II, Plaintiff

v.

Jury Trial requested:  
(please check one)  
 Yes  No

Dennis Padilla

Lehae Brandt

John musso

Amanda Slattery, 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.

Dawane Latiefh 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: Dennis Padilla Program coordinator  
(Name, job title, and complete mailing address)  
1600 W 24<sup>th</sup> 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: Lehae Brandt Program Coordinator  
(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: John Musso Program Director  
(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) Defendants

▶ Defendant No. 5

name: Meagan Hastie

Job or title: Nurse Practitioner

Address: 1600 W 24<sup>th</sup> St, Pueblo Co 81003

telephone No.: 719 546 4000

E-mail address: meagan.hastie@state.co.us

in her individual and OFFICIAL Capacity

▶ Defendant No. 6

name: Dr Hareesh Pillai

Job: Doctor

Address: 1600 W 24<sup>th</sup> 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. 7

name: Jenice Lewis

Job: Social worker

Address: 1600 W 24<sup>th</sup> St <sup>Pueblo</sup> ~~Denver~~ 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) Defendants

▶ Defendant No. 8

name: Kelly Hoy

Job: Social worker

Address: 1600 W 24<sup>th</sup> St Pueblo CO 81003

Telephone No.: 719 546 4000

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

In her individual and OFFICIAL capacity

▶ Defendant No. 9

name: Heather Bowen

Job: Lead nurse

Address: 1600 W 24<sup>th</sup> St Pueblo CO 81003

Telephone No.: 719-546-4000

E-mail address: Heather.Bowen

In her individual and OFFICIAL capacity

▶ Defendant No. 10

name: Donna DiJoseph

Job: Nurse Practitioner

Address: 1600 W 24<sup>th</sup> St Pueblo CO

Telephone No.: 719 546 4000

E-Mail address: Donna.DiJoseph@state.co.us

In her individual and OFFICIAL capacity

Attachment to Complaint: (I) The Parties to this Complaint (B) Defendants

▶ Defendant No. 11

name: Lila Padilla

Job: Lead nurse

Address: 1600 W 24<sup>th</sup> St Pueblo CO 81003

Telephone No.: 719 546 4000

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

In her individual and Official Capacity

▶ Defendant No. 12

name: Elizabeth Spence

Job: Team Lead Coordinator

Address: 1600 W 24<sup>th</sup> St Pueblo CO 81003

Telephone No.: 719 546 4000

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

In her individual and Official Capacity

▶ Defendant No. 13

name: COLORADO MENTAL HEALTH HOSPITAL IN PUEBLO

Job: SUPERVISOR OF CMHHIP STAFF

Address: 1600 W 24<sup>th</sup> St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address:

In it's Official

Attachment to Complaint: (I) The Parties to this Complaint (B) Defendants

▶ Defendant No. 14

name: STATE OF COLORADO

Job: Supervisor of CMHIP

Address:

Telephone No:

E-mail address:

Isn it's OFFICIAL

▶ Defendant No. 15

name: Dennis Heedt

Job: Patient rights advocate

Address: 1600 W 24<sup>th</sup> St Pueblo CO 81003

Telephone No: 719 546 4000

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

Isn his individual and OFFICIAL capacity

▶ Defendant No. 16

name: Desirae Rodriguez

Job: Patient right advocate

Address: 1600 W 24<sup>th</sup> St Pueblo CO 81003

Telephone No: 719 546 4000

E-mail address: Desirae.Rodriguez@state.co.us

Isn her individual and OFFICIAL capacity

Attachment to Complaint: (I) The Parties to this Complaint (B) Defendants

▶ Defendant No. 17

name: Angela Labenberg

Job: Patient rights advocate

Address: 1600 W 24<sup>th</sup> St Pueblo CO

Telephone No.: 719 546 4000

E-mail address: Angela.Labenberg@state.co.us

On her OFFICIAL and individual capacity

▶ Defendant No 18

name: Cara Silla

Job: Asistant Director OF Nurcing

Address: 1600 W 24<sup>th</sup> St Pueblo CO 81003

Telephone No.: 719 546 4000

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

On her OFFICIAL and individual capacity

▶ Defendant No 19

name: Kyle Urban

Job: Lead nurse

Address: 1600 W 24<sup>th</sup> St Pueblo CO 81003

Telephone No.: 719 546 4000

E-mail address: Kyle.Urban@state.co.us

On his OFFICIAL and individual capacity

Attachment to complaint: the party to this complaint

Defendant No. 20

name: Amanda Slattery

job: nurse practitioner

Address 1660 W 24th St Pueblo CO 81003

Telephone No: 719 546 4000

E-mail address: Amanda.Slattery@State.CO.US

In his individual and OFFICIAL capacity

Defendant was working For the State OF Colorado m when she  
violated my Federal constitutional rights

Attachment to complaint: II Basis For Jurisdiction (D)

- 1- Defendant Dennis Padilla, Was Working For the State of Colorado when he violated my Federal constitutional and statutory rights.
- 2- Defendant Lenae Brandt, Was Working For the State of Colorado when she violated my Federal constitutional and statutory rights.
- 3- Defendant John Musso, Was Working For the State of Colorado when he violated my Federal constitutional and statutory rights.
- 4- Amanda Slattery Defendant, Was Working For the State of Colorado when she violated my Federal constitutional and statutory rights.
- 5 Defendant Meagan Hastie, Was Working For the State of Colorado when she violated my Federal constitutional and statutory rights.
- 6 Defendant Dr Hareesh Pillai, Was Working For the State of Colorado when he violated my Federal constitutional and statutory rights.
- 7 Defendant Jenice Lewis, Was Working For the State of Colorado when she violated my Federal constitutional and statutory rights.

Attachment to complaint - Basis for jurisdiction (D)

8- Defendant Kelly Hoy, was working for the state of Colorado when she violated my Federal Constitutional and Statutory rights

9- Defendant Heather Bowen, was working for the state of Colorado when she violated my Federal Constitutional and Statutory rights

10 Defendant Donna Di Joseph, was working for the state of Colorado when she violated my Federal Constitutional and Statutory rights

11- Defendant Lila Padilla, was working for the state of Colorado when she violated my Federal Constitutional and Statutory rights

12 Defendant Elizabeth Spence, was working for the state of Colorado when she violated my Federal Constitutional and Statutory rights

13 Defendant COLORADO MENTAL HEALTH HOSPITAL IN PUEBLO, is a corporation operating under the laws of the state of Colorado when it violated my Federal Constitutional and statutory rights.

Attachment to complaint: II Basis For Jurisdiction (P)

14 Defendant STATE OF COLORADO, it is a corporation operating under the laws of the State of Colorado when it violated my Federal Constitutional and Statutory rights

15 Defendant Dennis Heedt, was working for the State of Colorado when he violated my Federal Constitutional and Statutory rights

16 Defendant Desirae Rodriguez, was working for the State of Colorado when she violated my Federal Constitutional and Statutory rights

17 Defendant Angela Labenberg, was working for the State of Colorado when she violated my Federal Constitutional and Statutory rights

18 Defendant Cara Silla, was working for the State of Colorado when she violated my Federal Constitutional and Statutory rights

19 Defendant Kyle Urban, was working for the State of Colorado when she violated my Federal Constitutional and Statutory rights

of 34  
Statement of Claim

## Count one: Deprivation of Property

▶ 1 - Defendant Dennis Padilla On 2/12/25 Under Color of Law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unite E-1 Feloniously Willfully, Knowingly and with malice, deprived me of my Property, that consisted of legal document, medical records, legal Books and religious books and materials; by making a teamate decision as unite teamembers to delay, obstruct and deprive me Plaintiff Latiefth II of my property nor respond to my request of property in a timely maner as stated in policy 18.25 of CMHIP causing dismis of several of my civil cases, Preventing me From initiate any new civil actions and lost of income taxes this constituted in the violation of my Due process of law under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution

▶ 2 - Defendant Dennis Padilla continues to retaliate against Plaintiff Latiefth until 7/29/25 by depriving Plaintiff of his property when Plaintiff Latiefth II is not violating any of CMHIP rules or policies; Defendant Dennis Padilla action violated Plaintiff Dawanne Latiefth II rights under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United state constitution

▶ 3 - Defendant Lenae Brandt On 2/12/25 Under Color of Law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unite Et Feloniously Willfully, Knowingly and with malice, deprived me of my Property, that consisted of legal document, medical records, legal Books and religious books and materials; by making a teamate decision as unite teamembers to delay, obstruct and deprive me Plaintiff Latiefth II of my property nor respond to my request of property in a timely maner as stated in policy 18.25 of CMHIP causing dismits of several of my civil cases, Preventing me From initiate any new civil actions and lost of income taxes this constitutes in the violation of my Due process of law under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution

▶ 4 - Defendant Lenae Brandt continues to retaliate against Plaintiff Latiefth until 7/29/25 by depriving Plaintiff of his property when Plaintiff Latiefth II is not violating any of CMHIP rules or policies, Defendant Lenae Brandt action violated Plaintiff Dawanne Latiefth II rights under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United state constitution

▶ 5 - Defendant John Musso On 2/12/25 Under Color of Law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unit E-1 Feloniously, Willfully, Knowingly and with malice, deprived me of my property, that consisted of legal documents, medical records, legal books and religious books and materials; by making a teamate decision as unit teamembers to delay, obstruct and deprive me Plaintiff Latiefth II of my property nor respond to my request of property in a timely manner as stated in policy 18.23 of CMHIP causing dismissal of several of my civil cases, preventing me from initiating any new civil actions and loss of income taxes this constitutes in the violation of my due process of law under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution

▶ 6 - Defendant John Musso continues to retaliate against Plaintiff Latiefth until 7/29/25 by depriving Plaintiff of his property when Plaintiff Latiefth II is not violating any of CMHIP rules or policies, Defendant John Musso action violated Plaintiff Dawanne Latiefth II rights under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United state constitution

▶ 7-Defendant Amanda Slattery On 2/12/25 Under Color of Law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unite E-1 Feloniously Willfully, Knowingly and with malice, deprived me of my property, that consisted of legal document, medical records, legal Books and religious books and materials; by making a teamate decision as unite teamembers to delay, obstruct and deprive me Plaintiff Latiefth II of my property nor respond to my request of property in a timely maner as stated in policy 18.23 of CMHIP causing dismis of several of my civil cases, Preventing me From initiate any new civil actions and lost of income taxes this constitutes in the violation of my Due process of law under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution

▶ 8 - Defendant Amanda Slattery continues to retaliate against Plaintiff Latiefth until 7/29/25 by depriving Plaintiff of his property when Plaintiff Latiefth II is not violating any of CMHIP rules or policies, Defendant Amanda Slattery action violated Plaintiff Dawanne Latiefth II rights under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United state constitution

► 9 - Defendant Meagan Hastie On 2/12/25 Under Color of Law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unite E-1 Feloniously Willfully, Knowingly and with malice, deprived me of my Property, that consisted of legal document, medical records, legal Books and religious books and materials; by making a teamate decision as unite teamembers to delay, obstruct and deprive me Plaintiff Latiefth II of my property nor respond to my request of property in a timely maner as stated in policy 18.25 of CMHHP causing dismis of several of my civil cases, Preventing me From initiate any new civil actions and lost of income taxes this constituted in the violation of my Due process of law under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution

► 10 - Defendant Meagan Hastie continues to retaliate against Plaintiff Latiefth until 7/29/25 by depriving Plaintiff of his property when Plaintiff Latiefth II is not violating any of CMHHP rules or policies, Defendant Meagan Hastie action violated Plaintiff Dawanne Latiefth II rights under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United state constitution

▶ 11- Defendant Dr Hareesh Pillai On 2/12/25 Under Color of Law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unite E-1 Feloniously, Willfully, Knowingly and with malice, deprived me of my Property, that consisted of legal document, medical records, legal Books and religious books and materials; by making a teamate decision as unite teamembers to delay, obstruct and deprive me Plaintiff Latiefth II of my property nor respond to my request of property in a timely maner as stated in policy 18.25 of CMHIP causing dismis of several of my civil cases, Preventing me From initiate any new civil actions and lost of income taxes this constituted in the violation of my Due process of law under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution

▶ 12- Defendant Dr Hareesh Pillai continues to retaliate against Plaintiff Latiefth until 7/29/25 by depriving Plaintiff of his property when Plaintiff Latiefth II is not violating any of CMHIP rules or policies, Defendant Dr Hareesh Pillai action violated Plaintiff Dawanne Latiefth II rights under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United state constitution

▶ 13-Defendant Jenice Lewis On 2/12/25 Under Color of Law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unite E-1 Feloniously Willfully, Knowingly and with malice, deprived me of my Property, that consisted of legal document, medical records, legal Books and religious books and materials; by making a teamate decision as unite teamembers to delay, obstruct and deprive me Plaintiff Laticeth II of my property nor respond to my request of property in a timely maner as stated in policy 18.23 of CMHIP causing dismis of several of my civil cases, Preventing me From initiate any new civil actions and lost of income taxes this constitutes in the violation of my Due process of law under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution

▶ 14-Defendant Jenice Lewis continues to retaliate against Plaintiff Laticeth until 7/29/25 by depriving Plaintiff of his property when Plaintiff Laticeth II is not violating any of CMHIP rules or policies, Defendant Jenice Lewis action violated Plaintiff Dawanne Laticeth II rights under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United state constitution

▶ 15-Defendant Kelly Hoy On 2/12/25 Under Color of Law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unit E-1 Feloniously Willfully, Knowingly and with malice, deprived me of my property, that consisted of legal document, medical records, legal Books and religious books and materials; by making a teamate decision as unite + members to delay, obstruct and deprive me Plaintiff Latiefth II of my property nor respond to my request of property in a timely maner as stated in policy 18.25 of CMHIP causing dismis of several of my civil cases, Preventing me From initiate any new civil actions and lost of income taxes this constitutes in the violation of my Due process of law under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution

▶ 16-Defendant Kelly Hoy continues to retaliate against Plaintiff Latiefth until 7/29/25 by depriving Plaintiff of his property when Plaintiff Latiefth II is not violating any of CMHIP rules or policies, Defendant Kelly Hoy action violated Plaintiff Dawanne Latiefth II rights under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United state constitution

▶ 17- Defendant Heather Bowen on 2/12/25 Under Color of Law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unit E-1 Feloniously Willfully, Knowingly and with malice, deprived me of my property, that consisted of legal document, medical records, legal Books and religious books and materials; by making a teamate decision as unite teamembers to delay, obstruct and deprive me Plaintiff Latiefth II of my property nor respond to my request of property in a timely maner as stated in policy 18.23 of CMHIP causing dismis of several of my civil cases, Preventing me From initiate any new civil actions and lost of income taxes this constitutes in the violation of my Due process of law under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution

▶ 18- Defendant Heather Bowen continues to retaliate against Plaintiff Latiefth until 7/29/25 by depriving Plaintiff of his property when Plaintiff Latiefth II is not violating any of CMHIP rules or policies, Defendant Heather Bowen action violated Plaintiff Dawanne Latiefth II rights under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United state constitution

▶ 19 - Defendant Donna DiJoseph on 9/24/25 under color of law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unit L-1 Feloniously, willfully knowingly had seized my property that consisted of: legal documents, legal note, legal book, medical records, prescription glasses, and religious books and materials; and send it to my family without going through an inventory with me been present, and coercing me to sign a document under threat of destroying my property (which I sign under duress) depriving me of my property by a decision that was made as a teammate of unit L-1 causing delay on my civil action and preventing me from initiate one, delay on my dora complaints, delay to Attorney general Complaint and the cause of obstruction of justice and legal injuries by the deprivation of legal Books, legal document, and legal notes that I was using to prove my pending criminal case #18CR264 and also preventing me from complying with the statutes of limitation on the majority of my civil cases this constitute in obstruction of justice and violation of my due process of law under 14<sup>th</sup> amendment to the unite State Constitution also in violation of the 4<sup>th</sup> amendment

▶ 20-Defendant Lila Padilla on 9/24/25 under color of law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unit L-1 Feloniously, willfully knowingly had seized my property that consisted of: legal documents; legal note, legal book, medical records, prescription glasses, and religious books and materials; and send it to my family without going through an inventory with me been present, and coercing me to sign a document under threat of destroying my property (which I sign under duress) depriving me of my property by a decision that was made as a teammate of Unit L-1 causing delay on my civil action and preventing me from initiate one, delay on my dora complaints, delay to Attorney general Complaint and the cause of obstruction of justice and legal injuries by the deprivation of legal Books, legal document, and legal notes that I was using to prove my pending criminal case #18CR264 and also preventing me from complying with the Statutes of limitation on the majority of my civil cases this constitute in obstruction of justice and Violation of my Due Process of Law under 14<sup>th</sup> amendment to the United State Constitution also in violation of the 4<sup>th</sup> amendment

▶ 21 - Defendant Elizabeth Spence on 9/24/25 under color of law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unit L-1 Feloniously, Willfully Knowingly had seized my property that consisted of: legal documents: legal note, legal book, medical records, prescription glasses, and religious books and materials; and send it to my family without going through an inventory with me been present, and coercing me to sign a document under threat of destroying my property (which I sign under duress) depriving me of my property by a decision that was made as a teammate of unit L-1 causing delay on my civil action and preventing me from initiate one, delay on my dora complaints, delay to Attorney general Complaint and the cause of obstruction of justice and legal injuries by the deprivation of legal Books, legal document, and legal notes that I was using to prove my pending criminal case #18CR264 and also preventing me from complying with the statutes of limitations on the majority of my civil cases this constitute in obstruction of justice and violation of my Due Process of Law under 14<sup>th</sup> amendment to the United State Constitution also in violation of the 4<sup>th</sup> amendment

▶ 22-Defendant Kyle Urban on 9/24/25 under color of law at 1600 W 24<sup>th</sup> St Pueblo CO 81003 in Unit L-1 Feloniously, willfully knowingly had seized my property that consisted of: legal documents, legal note, legal book, medical records, prescription glasses, and religious books and materials; and send it to my family without going through an inventory with me been present, and coercing me to sign a document under threat of destroying my property (which I sign under duress) depriving me of my property by a decision that was made as a teammate of Unit L-1 causing delay on my civil action and preventing me from initiate one, delay on my dora complaints, delay to Attorney general Complaint and the cause of obstruction of justice and legal injuries by the deprivation of legal Books, legal document, and legal notes that I was using to prove my pending criminal case #18CR264 and also preventing me from complying with the statutes of limitation on the majority of my civil cases this constitute in obstruction of justice and violation of my Due Process of Law under 14<sup>th</sup> amendment to the United State Constitution also in violation of the 4<sup>th</sup> amendment

▶ 23- By witnessing defendants Dennis Padilla, Lanae Brandt, John Musso, Amanda Slattery, Meagan Hastie, Dr Hareesh Pillai, Jenice Lewis, Kelly Hoy, Heather Bowen, Donna Di Joseph, Elizabeth Spence, illegal actions and failing to correct that misconduct and encouraging the continuation of misconduct. Defendant Cara Silla, Angela Labenberg, Dennis Heedt and Desirae Rodriguez are also violating Plaintiff Dawane Latiefth II rights under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution causing Plaintiff Dawane Latiefth II legal injuries and monetary losses for the dismissal of civil actions and income taxes.

▶ 24- By retaliating against Plaintiff Dawane Latiefth II by tampering with Plaintiff Latiefth II mail, depriving him of his property for Plaintiff Latiefth II exercising his legal right to complaint through the use of CMHIP grievance system against defendants; defendants Dennis Padilla, Lanae Brandt, John Musso, Amanda Slattery, Meagan Hastie, Dr Hareesh Pillai, Jenice Lewis, Kelly Hoy, Heather Bowen, Donna Di Joseph, Elizabeth Spence, illegal actions and failing to correct that misconduct and encouraging the continuation of misconduct are violating Plaintiff Dawane Latiefth II right under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution.

▶ 25- Defendant Colorado mental Health Hospital in Pueblo it is the supervisor of all staff of CMHHP defendant in this complaint and was well informed of this violation of Plaintiff Dawanne Latiefeth II Patient, Federal Constitutional and Statutory rights, by my grievances file through the system of CMHHP 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 Latiefeth II right under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution by virtue of its own conduct and state of mind that cause dismissal of Plaintiff Latiefeth II civil actions.

▶ 26- Defendant STATE OF COLORADO it is the supervisor of CMHHP and should had been informed of those violation of Plaintiff Dawanne Latiefeth Patients, Federal Constitutional and Statutory right by my grievance in file through the system of CMHHP which violations 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 Latiefeth II right under 4<sup>th</sup> and 14<sup>th</sup> amendment to the United State Constitution by virtue of its own conduct and state of mind that cause

▶ 27- Plaintiff Dawaune Latiefth II has no plain adequate or complete remedy at law to redress the wrongs describe herein, Plaintiff Dawaune 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:

**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)

## Relief

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

- A declaration that the act and omission described herein violated Plaintiff Dawanne Latiefth II rights under the constitution and laws of the United State.
- A preliminary and permanent injunction ordering defendants to  
Stop retaliating against the Patient For Filing grievances  
Stop harrassing the patient and abusing them  
Stop depriving the patient of their property  
Stop Seizing the property of the patient  
Stop attempting or destroying patient property
- Compensatory damage in the amount of \$750,000.00 against each defendant jointly and severally
- Punitive damage in the amount of \$750,000.00 — againsts 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

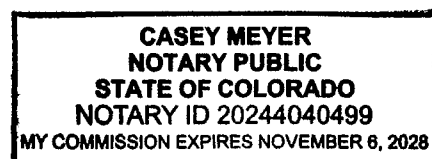
G. REQUEST FOR RELIEF

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

Date: 12/30/25



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 nonfrivolous 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)

12-30-25  
(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.

Dawaune LatiefHh II # 793443  
P.O Box 1108  
Denver CO 80201



United State District Court  
901 - 19<sup>st</sup> St  
Denver CO 80294

Legal mail

