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DATE \_\_\_\_\_

NAMES \_\_\_\_\_

Deputy District Attorney  
Denver District Attorney's Office  
201 West Colfax Avenue, #801  
Denver, CO 80202

Dear \_\_\_\_\_,

This letter is to express my recommendation regarding the negotiation of \_\_\_\_\_ court case in Denver District Court. I was originally appointed as Guardian ad Litem for \_\_\_\_\_ in Denver Juvenile Court (Case Number \_\_\_\_\_) on \_\_\_\_\_. After the case was filed in Denver District Court (Case \_\_\_\_\_), I was appointed as Guardian ad Litem on \_\_\_\_\_.

My strong recommendation is that the Office of the District Attorney considers a Division of Youth Corrections (DYC) or Youth Offender System (YOS) sentence. My position is based on numerous meetings with the juvenile, reviewing extensive documentation, and communicating with professionals and other individuals involved with the juvenile's situation.

It is obvious that the juvenile's life history has subjected him to profound abuse and neglect. From an extremely early age, he has been exposed to sexual abuse, homelessness, medical neglect, and substance abuse involving family members. From the testimony presented during the preliminary hearing and reverse transfer, such conduct has also directly resulted in a hospitalization from an extreme anxiety reaction to domestic violence. It is my further recollection that during the hearing, Dr. \_\_\_\_\_ characterized the juvenile as a "surrogate emotional husband" (to his mother). The cumulative effect of these experiences has had devastating consequences to his developmental well being.

Despite the above-indicated maltreatment, \_\_\_\_\_ has managed to avoid significant legal entanglements up until the allegations pertaining to the instant case. It has been reported that the juvenile has no prior state-level juvenile adjudications. Additionally, my investigation has revealed that he has no past FTAs nor violations of court conditions or bond. It is also highly relevant that since being placed in custody at Gilliam Youth Detention Center for more than ten months, he has always been extraordinarily respectful during our visits. The parties in this case are now aware that the juvenile has been diagnosed with \_\_\_\_\_. I have had the opportunity to accompany the juvenile on medical appointments to Children's Hospital Colorado. His behavior during each of the hospital visits has been exemplary. The hospital staff also noted how "well behaved" and "articulate" he was during the visits.

Since being placed in custody for a period of more than ten months, this juvenile has attempted to take advantage of opportunities that have been presented to him. In May 2013 after methodical preparation, he earned his General Equivalency Degree (GED). According to the written report prepared by Dr. \_\_\_\_\_, the juvenile's "Math function scores were all above 100 with a Multiplication Fluency Standard Score of 127, which was in the 96th percentile." My investigation revealed that for a period of three to four years, the juvenile was provided with a tutor who provided assistance for math which helped him significantly. While the juvenile has relative difficulty learning skills with large groups of people, he thrives in smaller groups. In fact, Dr. \_\_\_\_\_ indicated that his "affiliation with people" makes him increasingly amenable to treatment. I firmly believe that he should commence treatment as soon as possible.

In the course of my experience as a Guardian ad Litem in Denver Juvenile Court for more than fourteen consecutive years, I have come to understand that adolescents are less able than adults to assess risks and consequences, control impulses, and handle stressful situations. The pre-frontal cortex of the brain, which is responsible for "executive" functions of planning and abstract thinking, is not fully developed until one's early to mid-twenties. In this juvenile's case, this compromised executive functioning has been exacerbated by the significant trauma he has endured. When significant trauma takes place, the brain is simply preoccupied which curbs normal development. Fortunately, the plasticity of the brain makes successful treatment possible. Based on my contact with this juvenile and for the reasons indicated above, I am extraordinarily optimistic that this juvenile can thrive within the appropriate treatment environment and become a positive contributing member of society. Therefore, my strong recommendation is that a Division of Youth Corrections (DYC) or Youth Offender System (YOS) sentence be considered as part of the negotiations in his pending case.

Thank you in advance for considering my thoughts as part of the negotiating process. If you have any questions or comments concerning any aspect of this correspondence, please do not hesitate to contact me.

Sincerely,

Bradley M. Bittan, Esq.  
Guardian ad Litem