

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,	:	
	:	
v.	:	No. 1:21-cr-00502-CKK
	:	
DANIEL JOHN CHRISTMANN,	:	
Defendant.	:	

RENEWED MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

COMES NOW, Allen H. Orenberg, counsel for Daniel John Christmann, and hereby requests leave of Court to withdraw as counsel for the defendant in this matter.

As grounds, the following is stated:

1. On August 10, 2021, undersigned counsel entered his appearance pursuant to the Criminal Justice Act.
2. A trial date has not yet been scheduled.
3. Mr. Christmann is charged with misdemeanor violations of: 18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority (Count 1), 18 U.S.C. §1752(a)(2) – Disorderly and Disruptive Conduct in a Restricted Building (Count 1), 40 U.S.C. §5104(e)(2)(D) – Violent Entry and Disorderly Conduct on Capitol Grounds; Disorderly Conduct in a Capitol Building (Count 3), and 40 U.S.C. §5104(e)(2)(G) – Violent Entry and Disorderly Conduct on Capitol Grounds; Parading, Demonstrating, or Picketing in a Capitol Building.

4. Undersigned counsel and the defendant no longer enjoy a genuine attorney-client relationship; the crucial elements of trust and confidence by and between this lawyer and defendant have been eroded beyond the point where the relationship may be satisfactorily restored.

On January 31, 2022, Mr. Christmann advised counsel of his utter lack of confidence and complete dissatisfaction with counsel's representation in this matter. Furthermore, during this same conversation, Mr. Christmann unequivocally stated his desire for new counsel to represent him in this prosecution.

It is further believed that provided the opportunity to do so before this Court, Mr. Christmann will knowingly and voluntarily assent to the termination of the undersigned's representation.

5. Because of the severe penalties (including the possibility of imprisonment) which Mr. Christmann is facing, the Court should not compel him to proceed to trial with an attorney whom he no longer shares the essential elements of a viable and healthy attorney-client relationship.

6. Counsel submits that granting leave to withdraw as counsel will not prejudice the parties or the Court, and/or otherwise will be in the interests of justice.

WHEREFORE, for the foregoing reasons and such other reasons that may appear just and proper, Allen H. Orenberg, counsel for hereby requests leave of Court to withdraw as counsel for Daniel John Christmann in case no. 1:21-cr-00502-CKK.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of February, 2006, copies of the foregoing Renewed Motion for Leave to Withdraw as Counsel, along with a proposed Order, were served via CM/ECF to case registered parties and by postage prepaid first class mail and by e-mail to:

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Allen H. Orenberg