

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

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 21-CR-036
)	
)	
GINA M. BISIGNANO)	

MOTION FOR CLARIFICATION OF COUNSEL

TO THE HONORABLE CARL J. NICHOLS, JUDGE OF SAID COURT:

A. Charles Peruto, Jr., Esquire, files this Motion for Clarification of Counsel, requesting that the Court schedule a Zoom conference, in the above captioned case, with Assistant United States Attorney Kim Paschall (“AUSA Paschall”), the Defendant, Gina M. Bisignano (“Bisignano” or “Defendant”), and present defense counsel, A. Charles Peruto, Jr. (“Counsel” or “Peruto”), and in support thereof, avers as follows:

1. On March 1, 2021, A. Charles Peruto, Jr., Esquire entered his appearance as *pro hac vice* counsel on behalf of Defendant in the above referenced case.
2. Subsequent to entering his appearance, and up until the date of this Motion, the Defendant has written in excess of ten (10) letters to defense counsel criticizing his approach to the case.
3. The Defendant has written to the federal prosecutor, AUSA Paschall, dismissing Mr. Peruto as her attorney and expressing several complaints about how defense counsel has handled the case.
4. It is unclear how the Defendant wants to proceed as she is asking the Court for thirty (30) days to find a private lawyer to represent her, while simultaneously requesting court appointed

counsel, for which she qualifies.

5. The United States and Mr. Peruto have engaged in negotiations regarding stipulations and scheduling for the upcoming trial, however, the Defendant has “ordered” Mr. Peruto not to speak on her behalf.

6. This Motion is supported and signed by Robert L. Jenkins, Jr., Esquire, an active and sponsoring member of the Bar of this Court, and A. Charles Peruto, Jr., Esquire, *pro hac vice* counsel.

WHEREFORE, for these reasons, we pray that this Honorable Court will schedule a brief Zoom conference hearing, with all parties present, to address this matter soon in order to ensure a smooth transition to new lawyer, and so that the trial date may stay intact.

Respectfully submitted,

BYNUM & JENKINS

DATED: 6/12/23

By: /s/Robert L. Jenkins, Jr.
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DATED: 6/12/23

LAW OFFICES OF A. CHARLES PERUTO, JR.

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CERTIFICATE OF SERVICE

I hereby certify on the 12th day of June 2023, a copy of same was electronically filed using the CM/ECF system, and thus delivered to the parties of record, and pursuant to the rules of the Clerk of Court:

Kimberly L. Paschall
Assistant United States Attorney
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DATED: 6/12/23

LAW OFFICES OF A. CHARLES PERUTO, JR.

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