

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

HON. COLLEEN KOLLAR-
KOTELLY

v.

Case No. 22-cr-00170

TREVOR BROWN,

Defendant.

COMBINED MOTION AND BRIEF TO WITHDRAW AS COUNSEL

The Federal Community Defender was appointed to represent Mr. Brown on July 4, 2021, regarding allegations of criminal behavior in Washington D.C. on January 6, 2021.

Pursuant to Local Rule 44.5(d), counsel seeks leave to withdraw because Trevor Brown has refused to meet with counsel since our return from the unsuccessful plea hearing on May 24, 2023. It has been over two months without substantive contact on this case.

Mr. Brown first claimed to have retained the law firm of Fleener Petersen, based in Laramie, Wyoming and Fort Collins, Colorado, with Tom Fleener as his attorney. Mr. Brown stated that he wanted to go in a different direction with his legal representation and let his case team at the Federal Community Defender

know of this change on June 12, 2023. The attempted retainer agreement fell through.

Now, Mr. Brown claims to have retained Jonathan Gross out of Baltimore. I have spoken with Mr. Gross and he says he does intend to represent Mr. Brown, but that a couple things still need to be worked out before he files an appearance.

Unquestionably, there has been a communication breakdown between current counsel and Mr. Brown with regard to the strategy and logistics of his case – not to mention the fact that he has told counsel in no uncertain terms “Please don’t do anything further” on his case. See Ex. 1, Email from Trevor Brown to current counsel. He is clearly attempting to hire retained counsel. There is an irreconcilable conflict between Mr. Brown and undersigned counsel. In addition, Mr. Brown should be allowed to be represented by his counsel of choice, particularly since he is trying to retain private counsel.

Respectfully Submitted,

s/ Todd A. Shanker
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Dated: June 27, 2023

CERTIFICATE OF SERVICE

Counsel certifies that on June 27, 2023, the foregoing paper was filed with the clerk of the Court using the ECF system. Immediately after filing, counsel will send this motion to counsel for the Government and new defense counsel once retained via email. Counsel will also serve Mr. Brown with the Motion.

s/Todd Shanker