

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

**UNITED STATES OF AMERICA,**

**v.**

**TONYA BISHOP,**

**DEFENDANT.**

**CRIM NO.: 23- mj -00195-MAU**

**NOTICE OF MOTION AND MOTION FOR WITHDRAWAL OF LIONEL  
ANDRE AS COUNSEL FOR DEFENDANT TONYA BISHOP**

PLEASE TAKE NOTICE that I, Lionel André (“Movant”), hereby respectfully seek leave of this Court to withdraw as counsel for Defendant Tonya Bishop in the above-captioned matter. Tonya Bishop is currently represented by John Sciortino (ECF No. 9). Movant respectfully requests that the Court grant the motion on the papers and waive oral argument for the foregoing reasons.

**MOTION FOR WITHDRAWAL OF LIONEL ANDRE  
AS COUNSEL FOR DEFENDANT TONYA BISHOP**

Pursuant to Local Criminal Rule 44.5(d), Lionel André of SECIL Law PLLC hereby notifies the Court and counsel for the United States of his intention to withdraw as counsel for Defendant Tonya Bishop. This motion for withdrawal is made for the following reasons:

1. I am a Partner at SECIL Law PLLC. I was retained by Tonya Bishop and her husband, Bryan Bishop, in connection with criminal complaints filed against them by the United States.
2. Out of an abundance of caution, I secured separate counsel, John Sciortino, for Tonya Bishop.
3. I still represent Bryan Bishop.

4. My withdrawal will not prejudice the defendants.

5. Tonya Bishop will continue to be represented by John Sciortino in connection with the criminal complaint that was filed against her.

**CONCLUSION**

For the foregoing reasons, Movant respectfully requests that this Court waive oral argument on this Motion, grant his leave to withdraw as counsel for defendant Tonya Bishop in the above-captioned matter, and enter an order stating that Movant has so withdrawn.

September 13, 2023

Respectfully submitted,

By: /s/ *Lionel André*  
Lionel André  
SECIL Law, PLLC  
DC Bar No. 422534  
1701 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006  
[landre@secillaw.com](mailto:landre@secillaw.com)  
Telephone: 703.304.6529

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he has this day served opposing counsel with the foregoing document by filing the same with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel of record.

This 13<sup>th</sup> day of September 2023.

/s/ Lionel André  
Lionel André