

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 02 CR 1050
vs.)	Hon. James B. Zagel
)	
DENNIS JOHNSON,)	
)	
Defendant.)	

MOTION TO WITHDRAW AND APPOINT COUNSEL

KERI A. AMBROSIO requests leave to withdraw representation of DENNIS JOHNSON. Counsel additionally requests that the Court appoint the Federal Defender Program to represent Mr. Johnson, pursuant to 18 U.S.C. § 2006A. In support, counsel submits the following:

- (1) Counsel currently represents two defendants in this case, Tom Johnson and Dennis Johnson.
- (2) To avoid any conflict of interest, counsel requests leave to withdraw as counsel for Dennis Johnson.
- (3) Mr. Johnson is not able to retain counsel. See attached Financial Affidavit.
- (4) Daniel Martin of the Federal Defender Program has met with Mr. Johnson and is willing to represent him.

WHEREFORE, KERI A. AMBROSIO respectfully requests that the Court grant this request to withdraw, and that the Court appoint Daniel Martin to represent Dennis Johnson, pursuant to the Criminal Justice Act.

DATE: November 4, 2005

Respectfully submitted,

/s/ KERI A. AMBROSIO,
Attorney for the Johnsons

