

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

BRENDT CHRISTENSEN,
Defendant.



Case No. 17-CR-20037

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

NOW COME the attorneys of Bruno Law Offices LLC, Thomas Bruno, Anthony Bruno, and Evan Bruno (collectively, "Attorneys"), and hereby collectively request leave to withdraw as counsel for Defendant, Brendt Christensen. In support thereof, Attorneys state as follows:

1. On June 20, 2017, Attorneys met with Defendant, provided him with a consultation, and quoted a fee to represent him against possible federal kidnapping charges.
2. On June 30, 2017, the FBI arrested Defendant on a criminal complaint alleging kidnapping in violation of Title 18, United States Code, Section 1201(a)(1). Shortly thereafter, Attorneys met again with Defendant and agreed to defend him against that kidnapping charge in exchange for the fee quoted. Attorneys made clear at that time, and Defendant understood, that significant additional fees would be required if the Government's investigation led to additional or more serious charges. Between July 3 and July 6, 2017, Attorneys individually entered their appearances in his case. On July 12, the Grand Jury indicted defendant for kidnapping in violation of Section 1201(a)(1).
3. On August 28, 2017, the Government suggested in open court that it would seek a superseding Grand Jury indictment on additional charges within the next 30 to

- 45 days. Attorneys reasonably anticipate that such additional charges may implicate the prospect of capital punishment.
4. Despite best efforts over the past two months, Defendant and his family have been unable to secure sufficient additional funds to pay Attorneys for representation on additional charges. Accordingly, Defendant and Attorneys mutually agree that Defendant should proceed hereafter with appointed counsel.
 5. Further, given the voluminous discovery and the potential need for intensive pretrial litigation prior to the February 2018 trial, any delay in the appointment of new counsel could cause material adverse effect upon Defendant's interests. Accordingly, new counsel should be appointed at this time.
 6. Attorneys, if granted leave to withdraw, will remain willing to provide advice and consultation to new counsel, as appropriate, *pro bono*.

WHEREFORE, the attorneys of Bruno Law Offices LLC, Thomas Bruno, Anthony Bruno, and Evan Bruno, do hereby respectfully request leave to withdraw as counsel for Defendant in this matter.

Respectfully submitted,

BY: /s/ Evan S. Bruno, #6308658
Evan S. Bruno

/s/ Anthony A. Bruno, #6302496
Anthony A. Bruno

/s/ Thomas A. Bruno #3126002
Thomas A. Bruno

Attorneys for Defendant
Bruno Law Offices
301 West Green Street
Urbana, IL 61801
Telephone: 217-328-6000
Facsimile: 217-328-6765
Thomas: tombruno@tombruno.com
Anthony: lawyerbruno@gmail.com
Evan: evanbruno@evanbruno.com

CERTIFICATE OF SERVICE

I, Evan. S. Bruno, on behalf of myself, Thomas Bruno, and Anthony Bruno, hereby certify that on September 1, 2017, I electronically filed the foregoing Motion for Leave to Withdraw as Counsel with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record in this matter.

/s/ Evan S. Bruno, #6308658

Evan S. Bruno

Attorney for the Defendant

Bruno Law Offices

301 West Green Street

Urbana, IL 61801

Telephone: 217-328-6000

Facsimile: 217-328-6765

Email: evanbruno@evanbruno.com