

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 22-cr-20326-KMM

UNITED STATES OF AMERICA

Plaintiff,

vs.

ANDRE LORQUET,

Defendant.

MOTION TO WITHDRAW AS COUNSEL OF RECORD

COMES NOW, Zeljka Bozanic, Esq. and hereby moves to withdraw as counsel of record for the defendant, Andre Lorquet. As grounds in support thereof the defense would state the following:

1. On July 22, 2022, Mr. Lorquet was indicted and charged with four counts of Wire Fraud, four counts of Money Laundering and one count of Aggravated Identity Theft.
2. On November 17, 2022, the undersigned filed a Notice of Appearance in this case.
3. On January 24, 2023, Mr. Lorquet plead guilty before Magistrate Judge Louis.
4. Since taking the plea, Mr. Lorquet has asked the undersigned to file a motion to withdraw his plea.
5. Some of the reasons for Mr. Lorquet's request to withdraw the plea are challenging the effectiveness of assistance of counsel he has received and allege duress. Mr. Lorquet states that he believed that he was signing bond paperwork for his release, when he in fact signed a plea agreement.
6. The undersigned believes that there is a conflict of interest and that the Rules of Professional Responsibility prohibit her from continuing this representation.

7. The undersigned has filed a Motion to Withdraw Plea on behalf of Mr. Lorquet in a separate filing.
8. The undersigned respectfully requests that the Court grant this motion to Withdraw and appoint counsel for Mr. Lorquet who could effectively represent him in his Motion to Withdraw Plea and in the case.
9. Pursuant to Local Rule 88.9, undersigned counsel contacted AUSA Jonathan Bailyn, who takes no position on this motion.

WHEREFORE, the undersigned respectfully requests this motion be granted.

CERTIFICATE OF SERVICE

I HEREBY certify that on March 13, 2023, undersigned counsel electronically filed foregoing document with the Clerk of Courts using CM/ECF which will send notification of such filing to all counsel of record, and notification was sent to the Defendant via U.S. Postal Service.

Respectfully submitted,

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/s/Zeljka Bozanic

By: _____
Zeljka Bozanic
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