

United States District Court
Southern District of New York

United States,	)	
Plaintiff,	)	
	vs	
Chris Recamier,	)	Case # 21-cr-746 (MKV)
Defendant.	)	

Motion To Remove Counsel and
Appoint new CJA Counsel

Comes Now, Chris Recamier, defendant, pro se before this Honorable Court requesting current appointed counsel, Mrs. Lorraine Gault-Ruffo, to be withdrawn from my case and requesting a new CJA Attorney be appointed. For this motion defendant states as follows:

1.) Defendant's current counsel is Mrs. Lorraine Gault-Ruffo of LGR Law LLC.

2.) Defendant feels there is an irreconcilable conflict and difference of opinion on the manner in which deff's case should be litigated.

3.) Defendant has continuously advised current counsel that the plea presented is wholly unacceptable and deff will not plea as offered.

4.) Counsel has contacted, either personally or through a representative, defendant five times asking deff. to plea and stated that's deff's only option.

5.) Deff. feels current counsel has her mind set that a plea is the only outcome here and she has stopped fighting.

6.) Defendant has lost confidence in current counsel and respectfully asks for counsel to withdraw and a trial CJA Attorney be appointed.

The Sixth Amendment guarantees defendant the right to the effective assistance of counsel. Strickland v. Washington, 466 U.S. 668 (1984).

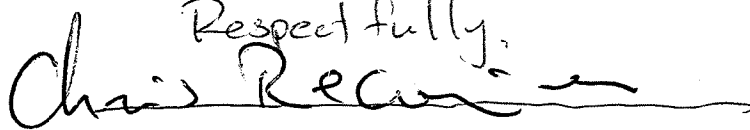
~~xx~~ Pursuant to McMahon v. Fulcomer, 821 F.2d 934, 932, 942 (3rd Cir. 1987) "the district court must
Ps 20P4

engage in at least some inquiry as to the reasons for the defendant's dissatisfaction with his existing atty."

WHEREFORE, defendant asks this Honorable Court to issue an order withdrawing current counsel and appoint a new trial CJA attorney. Defendant understands the seriousness of this motion and appreciates the court's time. If this Honorable Court wishes to hold a hearing on this motion, defendant asks for an immediate hear via tele-conference if possible.

Defendant asks this Honorable Court to take any actions it deems fit to replace counsel.

Dated this 3rd Day of May 2022

Respectfully,


Chris Recamer 68712-509
Deft Pro Se.
PO Box 329002
Brooklyn NY 11232

 3rd May 2022
STEPHEN A. ESPINET
Notary Public, State of New York
No. 01ES6194593
Qualified in Kings County
Commission Expires October 6, 2024

Certification of Service

I, Chris Recamer, hereby certify a copy of the foregoing was sent, postage prepaid via us mail to:

1) Lorraine Gault - Ruto - Atty. 6 Pompton Ave.
25 Cedar Grove, NJ 07009

2) Clerk of Court, 500 Pearl St, NY, NY 10017

3) Asst. US Atty, 500 Pearl St, NY NY 10017

On this ³rd Day of May, 2022

Chris Recamer

Chris Recamer
Dett Pro Se.



STEPHEN A. ESPINET
Notary Public, State of New York
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3rd May 2022