

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

CASE NO.: 23-cr-00009-TPB

UNITED STATES OF AMERICA

Plaintiff,

vs.

DENIS CASSEUS,

Defendant.

MOTION TO WITHDRAW

The undersigned, Zeljka Bozanic, files this Motion to Withdraw as Counsel of record, and as grounds states the following:

1. On January 25, 2023, Mr. Casseus was charged by Indictment with two counts of Bank Fraud in violation of 18 U.S.C. § 1344, two counts of False Statement to Lending Institution in violation of 18 U.S.C. § 1014, and one count of Illegal Monetary Transaction in violation of 18 U.S.C. § 1957.

2. On February 10, 2023, the undersigned entered a notice of appearance.

3. On May 26, 2023, Mr. Casseus pled guilty to count one, count two and count five of the Indictment.

4. On October 20, 2023, Mr. Casseus was sentenced to 24 months' imprisonment, to be followed by 36 months of supervised release. Mr. Cassesus was allowed to surrender to Bureau of Prisons by December 21, 2024.

5. On February 9, 2024, at the request of Mr. Casseus, the undersigned filed a Motion for Retroactive Application of Sentencing Guidelines pursuant to Amendment 821 [DE 64].

6. On February 15, 2024, the Court appointed Federal Public Defender for

purposed of the “Pro Se Motion” titled “Motion for Compassionate Release” [DE 62], which was apparently not filed by Mr. Casseus.

7. On March 7, 2024, Assistant Public Defender Laura Ferro filed a Notice of Appearance for Sentence Reduction Motion Purposes only [DE 71].

8. On March 12, 2024, Assistant Public Defender Laura Ferro filed a Motion for Clarification [DE 73].

9. The undersigned did not think there was a reason to file a motion for clarification, but informed Ms. Ferro that I was amenable to representing Mr. Casseus for the limited purposes of the 821 Amendment Motion I filed.

10. On March 13, 2024, after Mr. Casseus contacted the undersigned, the undersigned reached out to Ms. Ferro asking her to amend her motion, as Mr. Casseus felt it would be easier for the Federal Defender’s Office to represent him on both motions.

11. On March 14, 2024, Ms. Ferro responded stating that her office would prefer that the undersigned file a motion to withdraw.

12. Between March 18 and March 19, 2024, the undersigned was directly instructed by Mr. Casseus himself for the undersigned to file a Motion to Withdraw.

WHEREFORE, Zeljka Bozanic respectfully request that this Court enter an Order allowing the undersigned to withdraw from this matter and release the undersigned from any further responsibility in this case.

CERTIFICATE OF SERVICE

I HEREBY certify that on March 19, 2024, 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 via mail to Denis Casseus.

Respectfully submitted,

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