

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

Case No.: 1:24-cr-00424  
Honorable Jeremy C. Daniel

Francesco Distefano

Defendant.

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**MOTION TO WITHDRAW AS COUNSEL**

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Now comes the law firm of Oberheiden, P.C., Nick Oberheiden and Jennifer Corinis (“Counsel”), counsel for Defendant Francesco DiStefano (“Client”), and hereby move to withdraw as counsel due to an irreparable breakdown of the relationship between attorney and client in this case.

In addition to breaching Counsels’ engagement contract, Client has requested counsel to perform either impossible services or services that are—after much deliberation, analysis, and discussion—simply unreasonable according to Counsels’ best professional judgment.

More concerning, Client has engaged in abusive behavior toward counsel. For example, Client has terrorized Counsel with up to ten calls per day, nearly every day of the week, for weeks, even when he was aware that Counsel is with other clients or in court. In fact, Counsel was contacted by at least one local defense firm sharing Counsel’s experience. As it turned out, Client bombarded that firm with dozens of calls to a point where that firm contacted Counsel to ask Client to stop harassing them.

Client has displayed a profoundly rude behavior to Counsel, especially a concerning disrespect to female counsel Corinis. Among other things, Client wished Counsel “to die” and attacked Counsel with a profanity-laden tirades of the worst caliber.

Counsel has dedicated enormous amounts of time, in good faith and with their fullest

commitment, to inform Client, update Client, discuss legal matters with Client, strategize with Client, explain the legal process, analyze procedural options, communicate with the government, prepare Client, and otherwise committed well-documented time and efforts to represent Client ethically, diligently, and efficiently. In addition, Counsel has spent enormous efforts to accommodate Client desired healthcare services.

Counsel wishes to emphasize to the Court that the Assistant U.S. Attorney Jeffrey Snell, his entire team of investigating agents, and the United States Marshals service involved have conducted themselves as role models of professionalism, fairness, and collegiality throughout this matter.

As of this motion, Counsel is not aware that Client has retained a successor attorney for this matter. Client's contact information is as follows:

PHONE NUMBER: Kankakee County Prison, 815-802-7201

MAILING ADDRESS: Francesco DiStefano  
Prisoner ID # 530972  
3050 South Justice Way  
Kankakee, IL 60901

Client is aware of Counsel's filing of this motion to withdraw. Based on Client's "response" (too inappropriate to spell out), Client has made it reasonably clear that he supports this motion and in fact desires that the representation be terminated.

The government does not take a position.

On October 30, 2024, the Court continued the status hearing to December 12, 2024, at 9:30 a.m. Client is aware of this deadline and has stated his intention to retain successor counsel next week. This will allow ample time for client and successor counsel to prepare for the hearing on December 12, or to move for a continuance if needed. Accordingly, Counsel believes there will be no prejudice to Client if they are permitted to withdraw as counsel for Francesco DiStefano.

WHEREFORE, premises considered, the undersigned counsel respectfully requests that this Court allow Oberheiden, P.C., Nick Oberheiden and Jennifer Corinis to withdraw and be

withdrawn as counsel for Francesco DiStefano in this case, that they be removed from the electronic distribution list for receiving notices about this case, and for all such other and further relief to which they may show themselves justly entitled.

DATED: November 15, 2024

**OBERHEIDEN, P.C.**

/s/ Jennifer W. Corinis  
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ATTORNEYS FOR DEFENDANT  
FRANCESCO DISTEFANO

**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with counsel for the United States government who informed me that the United States does not oppose this motion. The client has indicated that he does not oppose the relief requested herein.

/s/ Jennifer W. Corinis  
Jennifer W. Corinis

**CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2024, a true and correct copy of the above and foregoing instrument was served electronically on Counsel for the United States via ECF.

/s/ Jennifer W. Corinis  
Jennifer W. Corinis