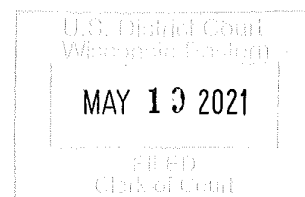


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
AT GREEN BAY



UNITED STATES OF AMERICA,

v.

Plaintiff,

Case No. 19-CR-151

GABRIEL BONILLA

Defendant.

MOTION TO DISMISS COUNSEL FROM CRIMINAL PROCEEDINGS,
AND MOTION FOR RECRUITMENT OF COUNSEL

NOW COMES DEFENDANT, Gabriel Bonilla, through and by himself, move the Court for a ruling dismissing current counsel assigned by the Federal Public Defenders Office to represent Mr. Bonilla, in the above-cited case number for the following reasons:

1) Attorney John Birdsall, was assigned to represent Mr. Bonilla, in the above-cited case number by the Federal Public Defendaers office from the onset of this indictment.

2) Mr. Bonilla, has made serval attempts to communicate with his attorney Mr. Birdsall, to (a) understand the alleged crimes/ charges being pursued against him by the Government (b) to discuss discovery material provided by the Government (c) to discuss all possible trial strategies, and (d) just the nature and status of the case. The latest attempt at communicating with attorney Birdsall, came from a March 13, 2021 letter Mr. Bonilla wrote and mailed to Mr. Birdsall. In the March 13, 2021, Mr. Bonilla, asked for updates as to the progress of his case. Mr. Bonilla, requested that he be made aware of all Court scheduled appearances even if he was not being produced, and what was discussed.

Mr. Bonilla, asked questions in his March 13, 2021, regarding the Superseding Indictment charges filed against him, and plea negotiations, and more. In spite of Mr. Bonilla latest attempt at having a better dialogue with his attorney as demonstrated from his March 13, 2021, letter, he has not received a reply from Mr. Birdsall. He has not received a telephone call. He has not received a written response. There has not been any forms of communication from attorney Birdsall, addressing Mr. Bonilla's concerns and questions which included a lack of communication between them. In fact, Mr. Bonilla, has learned of Court schedulings from family members who has searched online for said information. Mr. Bonilla, has learned that there was a recent telephone conference between the Court and attorneys representing the parties from his family member. Attorney Birdsall, still have yet to contact Mr. Bonilla, to update him on the discussion related to the telephone conference or any future scheduled Court appearances/the status of the case.

3) The telephone calls between attorney Birdsall and Mr. Bonilla, was always short in duration, and not informative as to the proceedings/direction of the case. Those phone calls was not in recent time, and the last written communication came about when the Government filed the Superseding Indictment, which again was not informative to say the least.

CONCLUSION

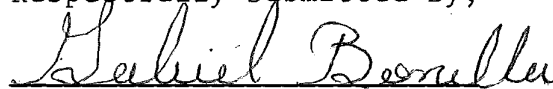
For the reasons stated above, Mr. Bonilla, has lost all confidence in attorney Birdsall representation in this criminal matter. [Case 1:19-cr-00151-WCG](#) [Filed 05/19/21](#) [Page 2 of 3](#) [Document 230](#)

Mr. Bonilla, does not believe that this attorney/client relationship can be repaired, and the confidence restored that his attorney Mr. Birdsall, is adequately representing his best interest in this criminal proceeding.

Inasmuch, Mr. Gabriel Bonilla, move the Court for a ruling dismissing attorney John Birdsall, as his criminal defense counsel from the case moving forward, and send the matter back to the federal Public Defenders Office for reassignment of another attorney, or an Appointment of Counsel by the Court, as Mr. Bonilla is an indigent Defendant who cannot afford private counsel paid for by himself.

Dated this 4th day of May, 2021.

Respectfully Submitted By;



Gabriel Bonilla

Case No. 19-CR-151

Mailing Address:

Inmate DOC No. 383849
Wisconsin Secure Program Facility
P.O BOX 1000
Boscobel, WI 53805

Cc:

John Birdsall
603 South 8th, Street
Sheboygan, WI 53081

William Rouch, Assistant United States Attorney General
U.S. Department of Justice/Eastern District of Wisconsin/Green Bay
205 Doty Street, Suite 301

Mr. GABRIEL BONILLA #383849
Wisconsin Secure Program Facility
P.O. BOX 1000
Boscobel, WI 53805

MAY 4, 2021

Honorable WILLIAM GRIESBACH
ROOM 102
JEFFERSON COURT BUILDING
125 SOUTH JEFFERSON STREET
GREEN BAY, WISCONSIN 54301-4541

Re: Case No. 19-CR-151

Dear Hon. Griesbach:

Enclosed please find a motion filed by defendant Gabriel Bonilla, requesting the Court to dismiss attorney John Birdsall, from representing Mr. Bonilla, in the above-cited case number, and referring the case/matter back to the Federal Public Defenders Office, or in the alternative, the Court appointing an attorney to represent Mr. Bonilla in this criminal proceeding.

Please be advised that a copy of this cover letter, and motion has been mailed to all parties by Mr. Bonilla.

Thank You for your attention to this matter.

Very Truly, *Gabriel Bonilla*

Babiel Bonilla #383849
Wisconsin Secure Program Facility
P.O. Box 1000
Boscobel, WI; 53805.

TO
JAMES
MAY
Circuit
RECEIVED

25 MAY 1962

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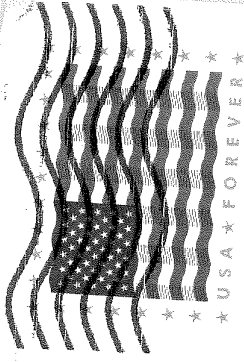
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Honorable William Griesbach
Room #102
Jefferson Court Building
Green Bay, WI 54301-4541

