

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA,

v.

19-CR-227-LJV

JOSEPH BONGIOVANNI,  
PETER GERACE, JR.,

Defendants.

---

UNITED STATES OF AMERICA,

v.

23-CR-37-LJV-MJR

PETER GERACE, JR.,

Defendant

---

**NOTICE OF GOVERNMENT'S EX PARTE AND SEALED MOTION TO  
DISQUALIFY**

**THE UNITED STATES OF AMERICA**, by and through its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Joseph M. Tripi, Nicholas T. Cooper, and Casey L. Chalbeck, Assistant United States Attorneys, Corey R. Amundson, Chief, United States Department of Justice, Public Integrity Section, and Jordan Dickson, Trial Attorney, United States Department of Justice, Public Integrity Section, of counsel, hereby files this Notice of Government's *Ex Parte* and Sealed Motion to Disqualify Attorney

Eric Soehnlein as counsel due to a *per se* conflict of interest. The Government's *Ex Parte* and Sealed Motion to Disqualify is filed separately, *ex parte* and under seal.

DATED: Buffalo, New York, November 21, 2023.

COREY R. AMUNDSON  
Chief

TRINI E. ROSS  
United States Attorney

BY: s/JORDAN DICKSON  
Trial Attorney  
Public Integrity Section  
U.S. Department of Justice  
Criminal Division  
1301 New York Ave. NW, Suite 1000  
Washington, D.C. 20530  
202-597-0508  
Jordan.Dickson@usdoj.gov

BY: s/JOSEPH M. TRIPI  
Assistant United States Attorney  
Western District of New York  
138 Delaware Avenue  
Buffalo, New York 14202  
716/843/5839  
Joseph.Tripi@usdoj.gov

BY: s/ NICHOLAS T. COOPER  
Assistant United States Attorney  
United States Attorney's Office  
Western District of New York  
138 Delaware Avenue  
Buffalo, New York 14202  
716/843-5830  
Nicholas.Cooper@usdoj.gov

BY: s/CASEY L. CHALBECK  
Assistant United States Attorney  
United States Attorney's Office  
Western District of New York  
138 Delaware Avenue  
Buffalo, New York 14202  
716/843-5881  
Casey.Chalbeck@usdoj.gov