

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

**16 CR 259 (CS)**

**NOTICE OF MOTION**

-against-

CHRISTOPHER ST. LAWRENCE,

Defendant.  
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PLEASE TAKE NOTICE THAT, Defendant Christopher St. Lawrence, by his attorney, moves the court for an order pursuant to Fed. R. Crim. P. 29(c) setting aside the verdict of guilty returned on Counts One, Three, Four, Five, Six, Seven, Eight, Nine, Eleven, Twelve, Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty, Twenty-One and Twenty-Two of the Indictment and entering a judgment of acquittal on those counts, or in the alternative for an order pursuant to Fed. R. Crim. P. 33 granting a new trial on Counts One, Three, Four, Five, Six, Seven, Eight, Nine, Eleven, Twelve, Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty, Twenty-One and Twenty-Two of the Indictment, on grounds including, but not limited to, the following:

1. The evidence in the case is insufficient to sustain a conviction.
2. The verdict is contrary to the weight of the evidence.
3. The verdict is not supported by substantial evidence.
4. The Court erred in denying Defendant's pre-trial motions
5. The Court erred in denying Defendant's motions *in limine*.
6. The Court erred in granting the Government's motions *in limine*.

7. The Court erred in allowing the testimony of witnesses as to prior alleged uncharged conduct of the Defendant unrelated to the Indictment at issue and without proper notice to the Defendant.
8. The Court erred in admitting the testimony of various witnesses to which objections were made.
9. The Court erred in sustaining objections to the testimony of various witnesses.
10. The Court erred in admitting hearsay, summary charts and other inadmissible evidence.
11. The Court erred in excluding admissible evidence.
12. The Defendant was substantially prejudiced and deprived of a fair trial for various reasons including, but not limited to, the Government's suppression of *Brady* evidence and the Court's initial allowance of improper hypothetical questions.
13. The Court erred in denying Defendant's motion for a continuance.
14. The Court erred in denying Defendant's motions for a mistrial.
15. The Court erred in denying Defendant's motion for a judgment of acquittal made at the close of all the evidence.
16. The Court erred in charging the jury, and in failing to charge as requested.
17. The Court erred in overruling the exceptions made to the charge of the Court and in not correcting the charge as suggested.
18. The Court erred in not granting the special requests offered on behalf of the Defendant, as these requests correctly stated the law of the case and endeavored to correct the general charge as to those particular principles to which the special requests were directed.
19. The Court erred in answering the jury's note about conspiracy.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to this Court's scheduling order of May 30, 2017 (Docket No. 156), Defendant's brief in support of the instant motions under Rules 29 and 33 will be filed on July 11, 2017; the Government's opposition is due August 22, 2017; and Defendant's reply is due on September 12, 2017.

This motion is based on Defendant's memoranda of law that will be filed in accordance with the aforementioned scheduling order, on all the files and records in this case, and any evidence that may be produced at a hearing on the motions.

Defendant reserves the right to amend this Notice to add additional grounds for the motions and will notify the Court and Government if such additional grounds are warranted.

Dated: June 2, 2017  
Goshen, New York

/s/ Michael K. Burke  
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Ashley N. Torre, Esq. (AT 9322)  
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