

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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Attorneys for Defendant, Francis Raia

**UNITED STATES OF AMERICA,**

Plaintiff,

vs.

**FRANCIS RAI A,**

Defendant.

Criminal No.: 18-657 (WJM)

**NOTICE OF MOTION FOR NEW TRIAL**

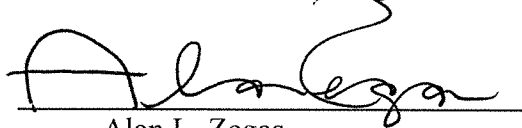
**TO:** RAHUL AGARWAL, AUSA  
SEAN FARRELL, AUSA  
United States Attorney's Office  
970 Broad Street  
Newark, New Jersey 07102

**PLEASE TAKE NOTICE** that at a time and on a date to be set by the court defendant Francis Raia, through his attorney, Alan L. Zegas, Esq., will move before the Honorable William J. Martini, of the United States District Court for the District of New Jersey in Newark, New Jersey, for an Order granting a judgment of acquittal or, in the alternative, a new trial, as a result of the verdict of the jury returned on June 25, 2019. The relief sought is warranted because: 1) the jury's guilty verdict was against the weight of the evidence; 2) the rulings of the court at trial, which were adverse to defendant, compromised the right of defendant to due process and a fair trial; and 3) any other grounds set forth by defendant in any briefs that have been filed with the

court, as well as any grounds that have been orally argued or will be orally argued by defendant's counsel before the court.

In support of the motion, the Defendant shall rely upon counsel's brief and oral argument.

**Law Offices of Alan L. Zegas**

A handwritten signature in black ink, appearing to read "Alan L. Zegas", is written over a horizontal line. The signature is stylized and cursive.

Alan L. Zegas

Dated: July 9, 2019

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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**UNITED STATES OF AMERICA,**

Plaintiff,

vs.

**FRANCIS RAIA,**

Defendant.

Criminal No.: 18-657 (WJM)

**JUDGMENT OF ACQUITTAL**

**THIS MATTER** having been opened to the Court by way of motion by defendant, Francis Raia, through his attorney, Alan L. Zegas, Esq., Law Offices of Alan L. Zegas, for an Order granting a judgment of acquittal or, in the alternative, a new trial, as a result of the jury's verdict on June 25, 2019, and the Court having heard oral argument and having considered all papers submitted by all parties, and for good cause shown,

**IT IS** on this                    day of                    , 2019,

For good cause shown, and for the reasons set forth by this Court on the record on this day, hereby vacates the verdict of the jury returned on June 25, 2019, and enters a judgment of acquittal in favor of defendant on Count 1 of the Indictment.

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HON. WILLIAM J. MARTINI, U.S.D.J.

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July 9, 2019

## **By E-Filing**

Honorable William J. Martini  
Courtroom 4B  
Martin Luther King Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: United States v. Frank Raia  
Criminal No.: 18-657 (WJM)

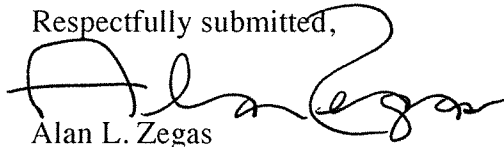
Dear Judge Martini:

Enclosed, on behalf of defendant, Frank Raia, is a notice of motion for a new trial, and a proposed order.

I would respectfully request that I be permitted 30 days to file a brief in support of the motion. Government Counsel, Rahul Agarwal and Sean Farrell, have kindly consented to this request, and have asked that the Government be given 30 days in which to file a response.

Thank you for your consideration.

Respectfully submitted,



Alan L. Zegas

cc: Rahul Agarwal, AUSA (Via ECF)  
Sean Farrell, AUSA (Via ECF)