

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DUPLICATE

UNITED STATES OF AMERICA, :

v. :

GEORGE W. HIGH, ET AL., :

Defendants. :

1:92-CR-182 RLV
(Second Superseding)

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LUTHER D. THOMAS, Clerk
By:  Deputy Clerk

MOTION FOR JUDGMENT OF ACQUITTAL
NOTWITHSTANDING THE VERDICT; OR IN THE ALTERNATIVE,
A NEW TRIAL

COMES NOW George W. High (hereinafter "High") and files this his Motion for Judgment of Acquittal Notwithstanding the Verdict; or in the Alternative, a New Trial and in support thereof shows the following:

1.

The government did not present sufficient evidence from which a reasonable trier of fact could find beyond a reasonable doubt that High was guilty as to Counts 1, 13, 14 and 15.

2.

The Court erred in not granting High's motion for severance as to Counts 3 and 9 (the firearms counts).

3.

The Court erred in charging the jury that knowledge of the unlawful nature of the act of structuring was not an essential element of the crime as set out in Counts 13 and 15.

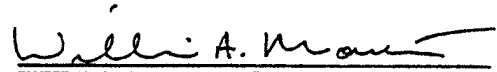
4.

The Court erred in not charging the jury that the government must prove that High was aware that the financial institution had a "legal" obligation to report currency transactions as opposed to a general knowledge of currency transaction reporting.

5.

The Court erred in not giving a charge on good faith as a complete defense to those charges in the indictment charging High with intent to defraud the United States government.

WHEREFORE, High prays that this Court enter a judgment of acquittal as to Counts 1, 13, 14 and 15; or in the alternative, a new trial.


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