

COMMONWEALTH OF MASSACHUSETTS
TRIAL COURT

SUFFOLK COUNTY

SUPERIOR COURT
DOCKET NO. 1584CR10164

COMMONWEALTH

V.

ANTHONY DEW

MOTION FOR NEW TRIAL (FOR LEAVE TO WITHDRAW GUILTY PLEAS)
PURSUANT TO MASS.R.CRIM.P. 30(b)

Now comes the defendant in the above-captioned matter, Anthony Dew (“Dew”), and pursuant to Mass.R.Crim.P. 30(b), moves this honorable court for leave to withdraw his guilty pleas.

In 2016, Dew, an indigent African American Muslim, pleaded guilty to assault and battery, five counts of sex trafficking, two counts of assault and battery with a dangerous weapon, and ten counts of drug offenses. Dew's appointed plea attorney was Richard Doyle.¹ The foundation of this motion are 20 original and shared statements and/or images posted by Doyle on his Facebook page between 2014 and 2017, publicly demonstrating his virulent bigotry toward African Americans and Muslims, among others. Doyle's racism and Islamophobia was such that his representation of Dew:

¹ Attorney Doyle is now deceased.

1. Violated Dew's rights under art. 1 and art. 12 of the Massachusetts Declaration of Rights;
2. Violated Dew's rights under the 6th and 14th amendments to the U.S. Constitution; and
3. Created a conflict of interests between Doyle and his client, Dew.

In support of this motion, Dew has filed herewith a supporting memorandum of law, his affidavit, and the affidavit of Attorney Elizabeth Dembitzer.

For the reasons set forth in the accompanying memorandum of law, Dew requests that this honorable court grant him an evidentiary hearing on this motion, and/or a new trial.

Respectfully Submitted,
Anthony Dew
By his attorney

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