

## **JUDGE ABRAMS' VOIR DIRE - CRIMINAL**

1. Has anyone on the jury panel read or heard anything in the newspaper or on the radio, television, or Internet concerning this matter?
  - If so, please identify yourself, and without going into the particulars of what you read, heard, or saw, identify the source of that information. Has this information caused you to form an opinion about the guilt or innocence of the Defendant?
2. Has any member of the jury panel discussed the issues in this case with anyone else or overheard such a discussion?
  - If so, based upon what you have read, heard, or discussed, have you begun to form any opinion concerning the facts in this case?
3. Do you, or any members of your family or friends, know me, Leslie Abrams, the presiding Judge in this case?
4. Does anyone know, in any way, the Defendant \_\_\_\_\_, the Defense attorney \_\_\_\_\_, or any other staff at attorney at Defendant's Attorney's firm\_\_\_\_\_?
5. Does anyone know, in any way, the prosecution team in this case, the United States Attorney Charles E. Peeler, Assistant U.S. Attorney \_\_\_\_\_, or any other attorney, investigator, secretary, or assistant employed by the United States Attorney's Office?
6. Does anyone have, or have a close family or friend who has, any close relationship with any of the Defendant's Attorney, the Defendant's Attorney's firm, or the United States Attorney's Office?

7. I am going to read a list of potential witnesses in this case. Does anyone know, in any way, the potential witnesses in this case?
8. Is there any member of the jury panel who knows any other members of the jury panel, whether from church, work, or the community?
  - If so, do you believe that, if you had to serve on the jury with the folks you know, that it would interfere with your ability to do your job as a fact finder?
9. Is there any member of the jury panel who has physical limitations that would inhibit his/her ability to sit during the length of a trial?
10. Has anyone in the jury panel, or a close family member of anyone in the jury panel, worked for or applied for a position with a law enforcement agency?
  - By a law enforcement agency, I mean organizations such as the Police Departments, Sheriff's Departments, State Patrols, F.B.I, the District Attorney's Office, United States Attorney's Office, C.I.A., I.R.S., Secret Service, Military Police, U.S. Customs Office, Probation Office, or private security firms.
11. Is there any member of the jury panel who would tend to give any greater weight or credibility, no matter how slight, to the testimony of a federal agent, law enforcement officer, or prosecution witness because they are employees of, or are testifying on behalf of, the Government?
  - Is there any member of the jury panel who would automatically give their testimony greater weight or credibility over that of a defense

witness?

12. Has anyone in the jury panel, or a close family member of anyone in the jury panel, worked for or applied for a position at any prison, jail, department of corrections, bureau of prisons, probation office, or parole agency?
13. Has anyone in the jury panel, or a close family member of anyone in the jury panel, worked for either a state or federal court system in any capacity?
14. Has anyone in the jury panel, or a close family member of anyone in the jury panel, worked in the legal industry or had any legal training, such as law school, or legal, forensic, or criminal justice classes?
15. Has anyone in the jury panel had a negative experience with the criminal justice system (police, prosecutor, or court) in which you believe you or an immediate family member was treated unfairly? If so, will you be able to set that aside and be fair to both the United States and the Defendant?
16. Has anyone in the jury panel ever had to testify in any sort of formal hearing, including a civil or criminal trial, or a deposition?
17. Does anyone in the jury panel currently, or within the last 5 years, belong to or participate in any crime prevention groups such as neighborhood watch groups?
18. Does anyone watch crime shows, such as "C.S.I.", "Law & Order", or "Forensic Files"?

- Are you prepared to set aside any opinions about criminal investigations or criminal laws you may have formed from watching those shows and render a fair and impartial verdict?
19. I am going to tell you the law that you must follow in reaching a verdict in this case. I am the only source of law that you must use to decide this case.
- Is there anyone who for any reason will not follow the law that I charge?
20. Does anyone know any reason why you would not be able to render a verdict based solely on the evidence presented at the trial and on the law, as I will give it to you in my instructions, disregarding any other ideas, notions, or beliefs about the law that you may have?
21. Under the law, a Defendant does not have to prove his or her innocence or produce any evidence at all. It is the Government's burden to prove guilt beyond a reasonable doubt. A Defendant does not have to testify, and if a Defendant chooses not to testify, you cannot consider that in any way while making your decision. Is there any member of the jury panel who believes that he or she could not follow my instruction on the law and render a fair and impartial verdict if the Defendant does not testify or put on any evidence?
22. Is there any member of the jury panel who believes that he or she could not follow the instructions of the Court concerning the federal law to be applied in this case if he or she thought the law should be different or in

some way disagreed with that law

23. You will not be called on to make any moral or religious judgments in this case. You will be called on to give a verdict in this case based on the evidence that the Court admits and the law that I charge. This is simply a legal judgment.

– Is there any member of the jury panel who, as a matter of conscience, for religious or moral or any other reasons, believes that he or she cannot sit in judgment in a criminal trial against a fellow human being?

24. Is there any member of the jury panel who for any reason believes that he or she could not render a fair and impartial verdict based solely upon the evidence and the law?

25. After having heard the questions put to you by the Court and the attorneys, does anyone know of any reason why you could not sit on this jury and render a fair verdict based on the evidence presented and in the context of the Court's instructions on the law?