

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA, *

PLAINTIFF, *

V. * CR. No. 2:10CR186-MHT

JARRELL W. WALKER, JR., *

DEFENDANT. *

**DEFENDANT WALKER'S PROPOSED
VOIR DIRE QUESTIONS**

Comes Defendant, by counsel, and respectfully requests this Honorable Court to qualify the jury as follows:

1. Do any of you have any objection with the statement of law that the indictment charging Jarrell [Jay] Walker in this case is not evidence of guilt of Mr. Walker and should not be considered by you as evidence, and it is only the procedure by which one is brought to trial.

2. Do any of you have a fixed opinion about this case or any case where someone is accused of a crime? If so, please stand and state your name.

3. The Government has the burden of proof and the defendant, Jarrell [Jay] Walker, is not required to meet any burden. Do any of you have any problems accepting the legal presumption that Jarrell [Jay] Walker is presumed to be innocent unless proven guilty beyond a reasonable doubt or

that the Government must prove Jarrell [Jay] Walker, guilty beyond a reasonable doubt?

4. If any member of the venire believes Jarrell [Jay] Walker is guilty merely because he is charged with a crime, please stand and state your name.

5. The defendant, Jarrell [Jay] Walker, is not required to prove his innocence and is not required to testify in any criminal case.

(A) Is there anyone who believes Jarrell [Jay] Walker is required to prove he is innocent?

(B) Is there anyone who would believe Jarrell [Jay] Walker is guilty merely because he did not testify?

(C) Would any of you hold it against him if he did not testify.

6. [Addition/Modification to this Court's Juror Questionnaire No. 66]: Are there any window stickers, or any other type of stickers or signs on the car that you or your spouse drive? If yes, what do they say?

7. [Follow-up to this Court's Juror Questionnaire No. 63] Do you have any close personal friends who have worked or volunteered in a law enforcement related job?

8. Is there anyone who believes that the testimony of a

law enforcement officer carries more weight than that of an ordinary citizen? In other words would you tend to believe the testimony of a law enforcement officer just because he or she is a law enforcement officer?

9. [Follow-up to this Court's Juror Questionnaire Nos. 41, 42 & 43] For those of you who have previously served on a civil or criminal jury, what kind of case was it and what was your verdict?

10. Will any of you feel an obligation to reach a verdict because that was the vote of the majority? If so, please stand and identify.

11. Please have the Government read a list of the Government's witnesses. Please raise your hand if you know any of these people. If you recognize their names, please tell me how you know them. (Read list of prosecution witnesses).

(a) Would your knowledge of Government witnesses tend to influence you to believe that the person you know is more likely to tell the truth than someone you do not know? Please identify.

12. Do any of you know any other person on the jury venire today?

(a) What is your relationship to that person?

(b) Would you be influenced by the way that juror reacted to the evidence if both of you are selected to sit on this jury?

Respectfully submitted this 23rd day of May, 2011.

s/Jeffery C. Duffey
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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following: Justin Shur, USDOJ, P.O. Box 197, Montgomery, AL 36101, and all other counsel of record.

s /Jeffery C. Duffey
JEFFERY C. DUFFEY