

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

Case no. 3:18-cr-89-J-34JRK

Reginald Brown

_____ /

DEFENDANT REGINALD BROWN’S PROPOSED JUROR QUESTIONNAIRE

The Defendant, Reginald Brown, by and through the undersigned counsel, pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, submits the following questions to be provided to prospective jurors in this matter:

Please Print Legibly – Please Use Only Black Ink

BIOGRAPHICAL INFORMATION

1. Name: _____
(First) (Middle) (Last) (Maiden)
2. Sex: (M) _____ (F) _____
3. Age: _____
4. Place of Birth: _____
5. Address: _____
6. Where else in Florida have you lived? _____
7. Have you ever lived anywhere else other than Florida? Yes _____ No _____
If Yes, where have you lived? _____
8. Race/Ethnic Background: _____
9. Marital Status: | Single | Never Married | Married _____ Yrs.
| Separated | Divorced | Living w/Someone _____ Yrs. | Widowed _____ Yrs.
10. If you have been married, how many times: | 1 time | 2 times | 3 times | 4 or more

FAMILY HISTORY

11. If you have children, please state their sex, ages and for your adult children, list their occupations (if they are students, please list their major area of study, if known):

12. Is your residence: _____ an apartment or _____ a house?

13. Do you _____ own or _____ rent your residence?

14. How many people live in your household? _____

a. How are they related to you?

EMPLOYMENT

15. What is your current occupation/job title? _____

1. Where do you work? _____

2. How long have you worked there? _____

3. What exactly do you do? _____

16. Have you supervised other people at your present or past place of employment?
Yes _____ No _____

a. If yes, how many people are or were under your supervision? _____

b. Are or were you responsible for hiring or firing employees? _____

17. Please list five most recent jobs or places of employment. (If needed, please use space provided on last page.)

<u>EMPLOYER</u>	<u>DESCRIPTION OF JOB</u>	<u>HOW LONG</u>	<u>REASON FOR LEAVING</u>
-----------------	---------------------------	-----------------	---------------------------

18. If you do not work outside the home, please give the reason (i.e. homemaker; student; retired; disabled; unable to find work): _____

19. If your spouse/partner works outside the home, what is his/her occupation and who is his/her employer? _____

20. If your spouse/partner does not work outside the home, please give the reason (homemaker; student; retired; disabled; unable to find work): _____

21. Have you, any family members or friends ever worked for, or sought employment with, a United States Attorney's Office, or any other office of the United States Government?

Yes ____ No ____

If YES, who, and what agency? _____

EDUCATION

22. What is your last level of education completed?

Elementary School ____ Grade ____

High School ____ Grade ____

Technical or Business School ____

College ____ 2 years ____ 4 years ____

Graduate or Professional School _____

a. If you attended school past high school:

1. What was your major area of study? _____

2. What degrees or certificates did you obtain? _____

b. Are you presently a student?

Yes _____ No _____

If yes, describe course of study and anticipated date of completion.

23. What is your spouse/partner's last level of education completed? _____

MILITARY EXPERIENCE

24. Have you served in the military? Yes _____ No _____

a. If yes, which branch? _____

b. Highest rank attained? _____ Rank at discharge? _____

c. What were your dates of service? _____

d. Nature of discharge? _____

e. What job(s) did you perform in the military? _____

f. Combat experience? Yes _____ No _____

g. If yes, when and where? _____

25. If your spouse/partner was in the military during the time of your marriage:

a. Which branch? _____

b. Highest rank attained? _____ Rank at discharge? _____

b. What were his/her dates of service? _____

- c. Nature of discharge? _____
- d. What job(s) did he/she perform in the military? _____
- e. Combat experience? Yes _____ No _____
- f. If yes, when and where? _____

26. Have you or your spouse/partner ever participated in a military court martial, or served in the military police, or other military law enforcement capacity? If yes, please describe the participation:

You: _____

Spouse/Partner: _____

LEGAL SYSTEM EXPERIENCE

27. If you are chosen to serve as a juror in this matter, the judge will instruct you that the defendant is presumed to be innocent of the charges contained in the indictment and this presumption of innocence can be overcome only if the Government proves - beyond a reasonable doubt - each essential element of the charges contained in the indictment. There is no burden on the defendant to prove that he is not guilty; the Government must prove he is guilty beyond a reasonable doubt.

a. Do you understand this rule of law? Yes _____ No _____

b. Will you be able to follow this rule of law? Yes _____ No _____

28. Have you, your spouse/partner, a family member, or close friend ever had an experience with a law enforcement officer in which you (or they) felt you (or they) were treated fairly or unfairly?

Yes _____ No _____

If yes, please describe the experience: _____

29. Have you, or has any close friend or relative, been the victim of or witness to, any kind of crime, whether it was reported to law enforcement authorities or not (including robbery, burglary, assault, sexual assault, etc.)?

Yes _____ No _____

If Yes, complete the following for each separate incident:

Relationship	Type of Crime	Victim or Witness	Reported to Police	Was Anyone Arrested?	Case Outcome

a. How did you, or the person close to you, feel that the police or law enforcement agency handled the situation? _____

b. Have you ever made a statement to the police? Yes _____ No _____

c. If yes, under what circumstances? _____

30. If there was a court hearing for the case or cases described in the previous question, did you testify in court? Yes _____ No _____
 If yes, how did you feel about the experience of testifying?

31. Have you or your spouse/partner ever been involved in a lawsuit? Yes__ No ____
 If yes:

a) What were the suits about? _____

b) How were you or your spouse/partner involved? _____

c) What were the results? _____

d) Were you or your spouse/partner satisfied with the results?
 Yes _____ No _____
 If not, why not? _____

32. Have you, any family members or close friends ever been investigated, charged, arrested, indicted, or convicted of any criminal offense? Yes ___ No ___
 If Yes

Relationship	Type of Crime	When	Were You/They Prosecuted?	Case Outcome

a) Please give more details about the circumstances:

b) How did you (or they) feel you (or they) were treated by the police?

c) Are there any criminal charges pending against you, your spouse/partner, family member or close friend now? Yes _____ No _____
 If yes, please describe: _____

d) As a result of that experience, what feelings or opinions have you formed about the police or the criminal justice system? _____

33. Have you, a friend or relative of yours ever been sentenced to time in jail or prison?
 Yes _____ No _____

If Yes, did you feel the person was fairly treated? Yes _____ No _____

If No, what did you think was unfair? _____

34. Would your experience affect your ability to be a fair and impartial juror in this case?

Yes _____ No _____

35. Have you or your spouse/partner ever had to appear in court, or in any court proceeding, as a plaintiff, defendant, victim, or witness for any reason other than you have indicated above?

Yes _____ No _____

If yes, please state when and why: _____

36. As a result of any experience described above, is there anything that would cause you to lean in favor of either the prosecution or the defendant in this case?

Yes _____ No _____

If yes, please explain: _____

37. Have you ever served:

As a juror in a civil case? | Yes | No | Number of times _____

As a grand juror? | Yes | No | Number of times _____

As a juror in a criminal case? | Yes | No | Number of times _____

If you have ever served as a juror in a criminal case, please fill out the following:

Date	State/Federal	Type of Case	What Verdict Was Reached?

a. In any of the criminal cases, were you the jury foreperson? Yes ___ No ___

b. In any of the criminal cases, did the jury set the penalty? Yes ___ No ___

c. What did you like or dislike about your prior jury service? _____

38. Based on your experience as a juror, do you feel the legal system worked to your satisfaction?

Yes _____ No _____

If no, please explain: _____

39. Have you or your spouse/partner had any legal training or ever worked for a lawyer, law office, or in any aspect of the legal business?

Yes _____ No _____

If yes, please state the involvement: _____

40. Have you or your spouse/partner ever filed a grievance or administrative complaint against or with a government or government agency, or a law enforcement officer?

Yes _____ No _____

If you or your spouse/partner has, please describe: _____

PARTIES, JUDGE, LAWYERS

41. Do you know any Assistant United States Attorneys, Assistant State Attorneys or anyone who works for the U.S. Attorney's Office or in any State Attorney's Office?

Yes _____ No _____

If Yes, whom do you know and how do you know this person? _____

42. Do you know any criminal defense attorneys or anyone who works for a criminal defense lawyer? Yes ____ No ____

If Yes, whom do you know and how do you know this person? _____

43. Do you know Reginald Brown, personally or through an acquaintance, or any member of his family? Yes ____ No ____

If Yes, whom do you know and how do you know this person? _____

LAW ENFORCEMENT

44. Have you, or has someone close to you, sought employment or been employed by any law enforcement agency (for example, a police or sheriff's office; a prison, jail, probation department; state attorney; the FBI; the DEA; the IRS)?
Yes ____ No ____

If yes, please list: _____

45. Have you, or has someone close to you, ever been employed in a security-related job for a private business (i.e. as a security guard or investigator)?
Yes ____ No ____

If yes, please list: _____

46. Have you had any training, courses, or work experience in law enforcement, criminal justice, administration of justice, investigation, civil rights, constitutional law, or criminology?
Yes ____ No ____

If yes, please describe: _____

47. Have you ever had a favorable or unfavorable experience with a lawyer (including a prosecutor or defense lawyer) or a judge? Yes ___ No ___

If yes, please explain: _____

48. How do you feel about the way the criminal justice system is working in the United States?

49. How do you feel about the way African American defendants are generally treated in the American criminal justice system? _____

50. How do you feel about the way public officials charged with a crime are generally treated in the American criminal justice system?

51. Which of the following best describes your feelings or opinions regarding the police, including federal law enforcement agencies such as the FBI?

- | | | |
|-------------------|----------|-------------------|
| Very Positive | Positive | Somewhat Positive |
| Somewhat Negative | Negative | Very Negative |

52. Are you aware of any case(s) where you felt the police did not do a thorough job investigating a crime?

Yes ___ No ___

If Yes, please give details: _____

53. What are your feelings or opinions of the Jacksonville Sheriff's Office?

54. What are your feelings or opinions of your local police department(s)?

55. What are your feelings or opinions of federal law enforcement agencies (FBI, DEA, etc.)?

56. In general, do you believe the testimony of a law enforcement officer is:
[Please check [x] only one box]

- | | |
|--|---|
| <input type="checkbox"/> Always believable | <input type="checkbox"/> More believable than other witnesses |
| <input type="checkbox"/> Same as any other witness | <input type="checkbox"/> Less believable than other witnesses |
| <input type="checkbox"/> Never believable | <input type="checkbox"/> Don't Know / Not Sure |

57. How would you view the testimony of a person who has pleaded guilty to a felony and agreed to testify for the government in the hope of receiving a more lenient sentence?

- | | |
|--|---|
| <input type="checkbox"/> Always believable | <input type="checkbox"/> More believable than other witnesses |
| <input type="checkbox"/> Same as any other witness | <input type="checkbox"/> Less believable than other witnesses |
| <input type="checkbox"/> Never believable | <input type="checkbox"/> Don't Know / Not Sure |

NATURE OF CRIMES CHARGED AND PRETRIAL PUBLICITY

58. The media generally presents both sides in a criminal case equally.

- | | | | |
|---|--|--|-------------------------------------|
| <input type="checkbox"/> Strongly Agree | <input type="checkbox"/> Somewhat Agree | <input type="checkbox"/> Agree | <input type="checkbox"/> No opinion |
| <input type="checkbox"/> Disagree | <input type="checkbox"/> Somewhat Disagree | <input type="checkbox"/> Strongly Disagree | |

59. Do you feel the media is generally?

- | | | |
|--|---|-----------------------------------|
| <input type="checkbox"/> Pro-Defendant | <input type="checkbox"/> Pro-Government | <input type="checkbox"/> Unbiased |
|--|---|-----------------------------------|

60. What criminal case(s) have you followed in the media, if any? _____

61. Reginald Brown, a former Jacksonville City Council person, is accused in this case of committing crimes such as conspiracy to commit mail and wire fraud, money laundering, and failure to file an income tax return. Have you heard or

read about this case? Yes _____ No _____

a. If Yes, what do you remember reading or hearing? _____

b. If Yes, what was your reaction to what you heard or read? _____

62. Based on what you have heard, read or seen about this case, which of the following best reflects your opinions regarding whether the defendant is guilty or not guilty of these charges:

- | Definitely Guilty | Probably Guilty | Possibly Guilty
- | Definitely Not Guilty | Probably Not Guilty | Possibly Not Guilty
- | None of the above

BURDEN OF PROOF/RIGHT TO REMAIN SILENT

63. A Defendant is innocent unless proven guilty beyond a reasonable doubt.

- | Agree strongly | Disagree Strongly | No Opinion
- | Agree | Disagree | Don't Know

64. If the government charges someone with conspiracy and other charges in Federal Court, that person is probably guilty.

- | Agree strongly | Disagree Strongly | No Opinion
- | Agree | Disagree | Don't Know

65. If a person is brought to trial on conspiracy and other charges in Federal Court, that person is probably guilty.

- | Agree strongly | Disagree Strongly | No Opinion
- | Agree | Disagree | Don't Know

66. A Defendant in a criminal case has the right to remain silent.

- | Agree strongly | Disagree Strongly | No Opinion
- | Agree | Disagree | Don't Know

67. Even though the law says a Defendant has the right to remain silent, an innocent person accused of a crime should testify.

- | Agree strongly | Disagree Strongly | No Opinion
- | Agree | Disagree | Don't Know

68. If the evidence points to a verdict of not guilty and guilty, the verdict should be not guilty.

- | | | |
|----------------|-------------------|------------|
| Agree strongly | Disagree Strongly | No Opinion |
| Agree | Disagree | Don't Know |

PERSONAL INFORMATION

69. Please list the names of all organizations to which you belong, including clubs, unions, societies, fraternal organizations, professional organizations, and churches (this includes groups like Kiwanis, Rotary, Knights of Columbus, American Legion, American Civil Liberties Union, National Rifle Association, League of Women Voters, Christian Coalition): _____

a. Indicate any leadership positions you hold or have held in any of those organizations (officer, committee chair, etc.) _____

70. Do you sympathize with any anti-government views expressed by

a. Anti-government groups or organization? Yes _____ No _____

If yes, please elaborate:

b. Pro-government groups or organization? Yes _____ No _____

If Yes, please elaborate:

71. Have you, a family member or close friend ever participated in any group concerned with crime prevention or victims' rights? If yes, what group was it? Describe its purpose and your participation or your family member/friend's participation:

72. What do you think are the major causes of crime?

73. What newspapers, magazines, trade journals or other publications do you read regularly?

74. What television programs do you watch on a regular basis?

75. Approximately how many hours a day do you watch television? _____

76. What radio programs do you listen to on a regular basis?

77. Do you listen to talk radio? Yes _____ No _____

If Yes, to what talk radio shows do you listen?

78. What is your primary source of news information?

- _____ Newspapers
- _____ Magazines
- _____ TV
- _____ Radio
- _____ Internet
- _____ Friends, Family, and Acquaintances
- _____ Other (please identify) _____

79. What are your leisure-time activities, hobbies, or interests?

80. Have you ever had a bumper sticker on your car? If so, what did it say?

81. Please list the three people you admire most:

- (1) _____
- (2) _____
- (3) _____

82. Please list the three people you admire least:

- (1) _____
- (2) _____
- (3) _____

83. Some people have a very good memory and other people do not. How would you describe your memory?

84. Do you have any physical or mental difficulties or obligations that would make it impossible or unreasonably difficult for you to serve in a trial that may last ____ weeks?

Yes _____ No _____

If yes, please elaborate:

a. Difficulty hearing? Yes _____ No _____

b. Difficulty seeing? Yes _____ No _____

c. Are you taking any medication on a regular basis? Yes _____ No _____
If yes, please identify _____

d. Does the medication affect your ability to see, hear, concentrate, etc.?
Yes _____ No _____

If yes, please explain _____

85. Have you, any family members, or any close friends ever undergone counseling, treatment, or hospitalization for psychiatric, psychological, emotional, family, behavioral, or substance abuse problems?
Yes _____ No _____

If yes, please explain:

86. Is there any matter, whether covered by this questionnaire or not, that you feel should be brought to the attention of the court?
Yes _____ No _____

If yes, please explain:

87. This trial could last as long as _____ weeks. Jury service of this length is an inconvenience and hardship for virtually every juror. Tell us about any extraordinary hardship jury service in this case might cause you:

88. Is there any matter covered by this questionnaire that you did not wish to write about and omitted, but would prefer to discuss privately with the court?
Yes _____ No _____

Please use this space to finish any of your answers. Note the number of the question and then complete answer below (use additional paper or the backside of this questionnaire if more space is needed)

I attest and affirm under the penalty of perjury that the answers set forth above are true and correct to the best of my knowledge and that I have answered all of the questions in this Juror Questionnaire by myself, without anyone's assistance, and to the best of my ability.

Signature

Date

Respectfully submitted,

S:// Thomas M. Bell

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 18, 2019, I electronically filed the foregoing with the clerk of the Court by using CM/ECF system which will send a notice of electronic filing to A. Tysen Duva, AUSA, Michael Coolican, AUSA, John P. Leombruno, Esq. jleombruno@arnoldlawfirmllc.com, and Richard Landes, Esq., rjlandes@gmail.com.

S:// Thomas M. Bell
THOMAS M. BELL