

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CRIM. NO. 15-CR-49 (MJD/FLN)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**DEFENDANTS' JOINT MOTION
FOR WRITTEN JURY
QUESTIONNAIRE**

HAMZA NAJ AHMED (1),
ADNAN ABDIHAMID FARAH (3),
ABDURAHMAN YASIN DAUD (4),
ZACHARIA YUSUF ABDURAHMAN (5),
HANAD MUSTOFE MUSSE (6),
GULED ALI OMAR (70),

Defendants.

Defendants Hamza Naj Ahmed, Adnan Abdihamid Farah, Abdurahman Yasin Daud, Zacharia Yusuf Abdurahman, Hanad Mustofe Musse and Guled Ali Omar, by and through their undersigned counsel, herby move the Court to issue a written jury questionnaire to potential jurors prior to jury selection. Defendants further request the questionnaire be completed by the potential jurors and given to counsel for review at least fourteen days before trial.

Written juror questionnaires are often used where there exists a high risk of prejudicial pretrial publicity. *See, e.g., United States v. Davis*, 154 F.3d 772, 784 (8th Cir. 1998); *see also* Walter F. Abbott & John Batt, Eds., A Handbook of Jury Research § 16.05 at 16-6 (1999) (“Supplemental jury questionnaires are now routine in . . . high-profile criminal trials.”). The American Bar Association has long endorsed the process.

Am. Bar. Ass'n, Principles for Juries and Jury Trials, Principle 11.A (2005); ABA Standards for Criminal Justice Discovery and Trial by Jury, Standard 15-2.2 (3d ed. 1996).

The questionnaire is necessary because of the nature of the case; because of the need to prevent embarrassment of jurors at oral voir dire; because of the need to obtain truthful and confidential answers regarding sensitive and potentially embarrassing questions; because of the need to conserve the Court's time during voir dire; and to insure a fair jury selection process.

WHEREFORE, the defendants respectfully request the Court grant their motion for a written jury questionnaire.

Respectfully submitted,

Dated: August 6, 2015

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