

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:08-cr-00107

**FRANK E. MELTON
MICHAEL RECIO
MARCUS WRIGHT**

**GOVERNMENT'S PROPOSED QUESTIONS TO BE
INCLUDED IN JUROR QUESTIONNAIRE**

As requested by the Court in its Order dated September 16, 2008, the United States, by its undersigned counsel, respectfully submits the following questions for consideration by the Court for inclusion in a juror questionnaire:

1. A. What is the highest level education you have achieved?

- B. If you attended a college or university, please identify: (1) the school, (2) any degree that you obtained, and (3) the field of study that you pursued.

2. Have you ever studied law or taken any courses in law, law enforcement, criminology or criminal justice? _____
If yes, please describe:

3. Please list your occupation, employer (if you are retired or not currently employed, please indicate your most recent occupation and employer), and the length of time that you have been, or were, employed by your current or most recent employer?

4. What are/were your specific duties and responsibilities on the job, including whether you supervise others - and if so, how many people do you supervise?
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5. Have you, your spouse, close relatives or any close friends ever worked in a law-enforcement-related job, such as police, sheriff, state trooper, prison guard, federal law enforcement, or the military police? 1. Yes ___ 2. No ___
If yes, please explain:
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6. List any religious, social, civic, professional, trade, union, athletic group, country club, or other organizations that you or your spouse have been affiliated with:
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7. If you have held an office or are currently an officer in any organization with which you are or have been affiliated, please list the organization and the office you held:
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8. What is your main source of news? (please circle one): a. television; b. radio; c. newspaper; d. magazines; e. Internet; f. none; g. other
9. Please list your three favorite TV shows and three favorite radio programs?
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10. What magazines or newspapers do you read on a regular basis?
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11. Have you ever served on a jury? (please circle one) a. Yes, criminal trial
b. Yes, civil trial c. Yes, both criminal and civil d. Yes, grand jury
e. No
If yes, please describe the general nature of the case and any verdict rendered:
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12. Have you ever been a party, witness or observer in any kind of lawsuit?

1. Yes ___ 2. No ___

If yes, please explain:

13. Have you, or has your spouse, any close relative, or friend, ever been arrested, accused of a crime, charged or indicted for a crime, or taken to jail for any reason? 1. Yes ___ 2. No ___

1. Yes ___ 2. No ___

If yes, please explain:

14. Have you, or has your spouse, any close relative or friend, ever had a serious dispute with any city, state or federal governmental agency? (including the local police, sheriffs' departments, highway patrol, FBI, IRS, Social Security Administration, Veterans Administration, State of Mississippi, District Attorney's office, etc.) 1. Yes ___ 2. No ___

If "Yes," please briefly explain what happened:

Do you think the dispute was handled fairly?

15. Do you have any ethical, religious, political, or philosophical beliefs that would prevent you from judging others and serving as a juror? 1. Yes

2. No _____

If yes, please explain:

WHEREFORE, the United States respectfully requests that this Court include the foregoing questions, as well as any additional questions that the Court may deem appropriate, in a juror questionnaire to be provided to the venire prior to jury selection.

Respectfully submitted,

GRACE CHUNG BECKER
Acting Assistant Attorney General
Civil Rights Division
United States Department of Justice

By: /s/ Mark Blumberg
Deputy Chief
Criminal Section
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/s/Patricia Sumner
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CERTIFICATE OF SERVICE

I, the undersigned counsel for the United States, hereby certify that on the 26th day of September, 2008, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

John Reeves, Attorney for Frank E. Melton

John M. Colette and Matt Baldrige, Attorneys for Defendant Marcus Wright;

and

Cynthia Stewart, Attorney for Michael Recio.

/s/ Mark Blumberg