

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

BRADLEY STUART BENNETT,

Defendant.

Criminal Action No. 21-312 (JEB)

VOIR DIRE

1. This is a criminal case entitled United States v. Bradley Bennett. The Defendant is charged with a number of counts — *e.g.*, Obstruction of an Official Proceeding, Entering and Remaining in a Restricted Building or Grounds, and Disorderly and Disruptive Conduct in a Restricted Building or Grounds — which derive from his alleged participation in the events that took place on the U.S. Capitol grounds on January 6, 2021. Do you know or have you heard anything about his involvement specifically in these events?
2. The Government in this case is represented by Assistant United States Attorneys Nialah Ferrer and Anna Krasinski. Also at counsel table for the Government is FBI Special Agent _____, and paralegal _____. The Defendant is Bradley Bennett, and he is represented by Assistant Federal Public Defenders Leza Driscoll and Rosemary Godwin. Do you know any of these people?
3. [Each side will provide the names of witnesses and people who might come up during the trial. They will be described by name, general area of residence, and/or employment.] Do you know any of the witnesses that have been introduced to you?

4. [The next three questions relate to you, members of your immediate family, and close personal friends.] Does anyone in that group now work for, or has anyone in that group ever worked for, any law-enforcement agency? This includes any police department in or outside the District, special police officers, prosecutors' offices such as the state's attorney or U.S. Attorney, Park Police, FBI, Dept. of Justice, Homeland Security, sheriffs' departments, Secret Service, or any other law-enforcement agency.
5. Has any member of that group ever gone to law school, worked as a lawyer, or worked in a law office, including any state or federal defender's office?
6. Has any member of that group ever been arrested for, convicted of, or charged with any crime or been a victim of or witness to any crime of violence, such as assault?
7. I will be instructing the jury at the end of the trial that the testimony of a law-enforcement officer should be treated the same as the testimony of any other witness and that the jury should not give either greater or lesser weight to the testimony of a witness simply because that witness works in law enforcement. Does anyone have such strong feelings about law enforcement – either positive or negative – that would make it difficult for you to be a fair juror in the case?
8. Would the nature of the case — allegations of acts on the U.S. Capitol Grounds on January 6, 2021 — make it difficult for you to sit fairly and impartially as a juror?
9. Were any of you present in or around the Capitol grounds on that date?
10. Do any of you live or work within a few blocks of the U.S. Capitol?
11. Do you or does someone you know have any direct connection to events at the U.S. Capitol on January 6, 2021?

12. Have you ever watched video of what happened at the U.S. Capitol on January 6, 2021, on the news, Internet, or social media?
13. Have you watched any portion of the TV coverage of hearings by the “January 6” committee in the House of Representatives, or have you read the committee’s final report?
14. Do you have such strong personal feelings or opinions about the outcome of the 2020 presidential election that they would affect your ability to be fair and impartial in this case?
15. Has anyone served on a grand jury before?
16. Do you know any other panel member?
17. Do you have a hearing problem such that it would make it difficult for you to hear testimony, or an eyesight problem, or any other medical condition that would make it difficult for you to view or read evidence?
18. Are you presently taking any medication that might cause drowsiness, or experiencing any other physical or mental conditions which might in any way affect your ability to give your full attention to this case?
19. Do you have any difficulty understanding the English language?
20. Would serving as a juror in this case be an extreme hardship to anyone [discuss schedule].
21. My final question is what I call my “catch-all question.” This asks whether there is any other reason that I haven’t asked about that might make it difficult for you to sit fairly, impartially, and attentively as a juror. Perhaps you have a religious, moral, or philosophical reason that you believe would make it hard for you to be fair. In sum, is

there some other reason that would make it difficult for you to sit as a fair and impartial juror in this case?