

**United States District Court  
District of Columbia**

United States of America )  
 )  
vs. ) Case No. 1:22-CR-00038-BAH  
 )  
Jolene Eicher )

**Reply to Government's Response to  
Defendant's Motion for Partial Attorney Conducted Voir Dire**

Matthew Hill  
Assistant Federal Public Defender  
201 Abingdon Pl  
Suite 201  
Abingdon, VA 24210

Jolene Eicher has moved the Court to allow her a short period of time for attorney conducted *voir dire*. The government objects. The government further objects to one of the *voir dire* questions proposed by the Defendant.<sup>1</sup>

Ms. Eicher believes the single most important issue to be explored with the potential jurors in this case is their feelings about whether persons who went to the United States Capitol on January 6, 2021 (other than persons whose employment required their presence) committed some crime. Responses to that question may give rise to causal challenges. Responses to that line of question will allow Ms. Eicher to exercise her preemptory challenges meaningfully. Both of these are essential so that a fair and impartial jury is seated.

Further, a motion to transfer venue was filed by Ms. Eicher. That motion was denied. The conclusion of the Court's ruling on that motion is distilled to the conclusion that "a vigorous *voir dire* should suffice to root out any bias in individual jurors." (ECF 34). Ms. Eicher believes that her counsel is the one best positioned to conduct that vigorous inquiry.

Respectfully Submitted,

**Jolene Eicher**  
By Counsel

JUVAL O. SCOTT  
Federal Public Defender  
Western District of Virginia

**Matthew Hill**  
Assistant Federal Public Defender  
Missouri State Bar No. 47889

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<sup>1</sup> Should the Court allow attorney conducted *voir dire* the Court need not ask the question to which the government objects.

New Hampshire State Bar No. 18864  
Arkansas State Bar No. 2018170  
Attorney for the defendant  
Federal Public Defender's Office  
201 Abingdon Place  
Abingdon, VA 24211  
Telephone: (276) 619-6086  
Fax: (276) 619-6090  
[matt\\_hill@fd.org](mailto:matt_hill@fd.org)

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/s/ Matthew Hill