

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

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| <b>UNITED STATES OF AMERICA</b> | ) |   |
|                                 | ) | <b>Criminal No. 21-190 (DLF)</b>          |
| <b>v.</b>                       | ) | <b>Judge Friedrich</b>                    |
|                                 | ) | <b>Pretrial Conference: July 10, 2023</b> |
| <b>ZACHARY ALAM</b>             | ) |   |

**ADDITIONAL PROPOSED VOIR DIRE QUESTIONS**

COMES NOW the defendant, Zachary Alam, by and through undersigned counsel, and respectfully moves this Honorable Court use the following voir dire questions in addition to the ones the Court has already indicated it plans to use. Towards this end, Mr. Alam would show:

1. On June 28, 2023, the Court filed voir dire question for this case. Proposed Voir Dire (ECF #73). In a docket entry accompanying the filing, the Court directed the parties to file objections to its voir dire questions by July 7, 2023.
2. Mr. Alam does not object to the Court's voir dire questions. However, he requests that the Court also use to following voir dire questions:
  - a. To reach a verdict on a particular charge, every juror must agree on the verdict. In other words, every verdict must be unanimous. In deliberations, you must consider the opinions and points of view of you fellow jurors, but you must also follow your own conscience and be personally satisfied that the verdict on any charge is the right one. Would you be able to express your opinions to other jurors even if they disagree with you?
  - b. If you are selected as a juror in this case, the judge will instruct you to avoid and not seek out media coverage about this case or Mr. Alam. The judge will instruct you not to google or search for information about this case or Mr. Alam on the internet. Do you have any questions or concerns about your ability to follow such instructions?

- c. You are to decide this case based only on the evidence presented in court and not based on anything you may have learned about the events of January 6 from outside sources such as the news or social media. Can you put aside what you may have already learned about the events of January 6 and any opinions you may have already formed about the people involved in those events when considering the evidence in this case?
- d. Do you think that, if a person entered the U.S. Capitol on January 6 as part of the group of people who stormed the building, that person likely did so because he was trying to stop, delay, or interfere with the certification of Electoral College votes for Joseph Biden as President?
- e. Do you think that people who participated in the events at the U.S. Capitol on January 6 are likely guilty of criminal wrongdoing?
- f. What social media platforms do you use, how often do you use them, and what do you use them for?
- g. What sources do you rely on for your news?
- h. Do you, any member of your family, or any close friend belong to a group or organization that is active in law enforcement or crime prevention? Some examples of such groups and organizations are Fraternal Order of Police, Crime Watch, Neighborhood Watch, Crime Stoppers, and online groups that monitor and discuss neighborhood crime issues.

WHEREFORE, the defendant, Zachary Alam, moves this Honorable Court to use the above voir dire questions in addition to the ones the Court has already indicated it plans to use.

Respectfully submitted,

/s/

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