

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
) CRIMINAL NO. 21-cr-246 (ABJ)
)
)
)
EDWARD BADALIAN)

Defendant’s Motion for Use of a Juror Questionnaire

Edward Badalian, through his Attorney, Robert M. Helfend, respectfully files this motion for the use of a juror questionnaire and in support states the following:

The use of a prescreening questionnaire may be considered when a lengthy trial is anticipated, or certain biases may be at issue or there has been a great deal of pretrial publicity. See Skilling v. United States, 130 S. Ct. 2896 (2010).

In this matter, potential jurors may hold biases against people who were inside any Capitol building or expressed any desire to keep the then current administration in power. Certainly, there was and remains a great deal of pretrial publicity.

In support of the motion, Mr. Badalian respectfully submits that completion of the jury questionnaire attached as Exhibit "1" prior to jury selection would facilitate a more informed jury selection by the parties, expedite the jury selection process, and minimize embarrassment and inconvenience to potential jurors. Undersigned counsel conferred with AUSA Paschall who was not able to obtain consent to our motion prior to the filing deadline.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify on the 11th day of October, 2022, a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and in pursuant to the rules of the Clerk of Court.

/s/ Robert Helfend