

PROPOSED
VOIR DIRE QUESTIONS
NOAH'S ARK CASE

1. Do you personally know, or have any connection with, the defendants (name) or (name).
2. What kind of work do you do?
3. Have you ever done any sort of work with animals?
4. (If the answer to question #3 was "yes") What was the nature of that work?
5. Do you own any pets?
6. Do you own a cat?
7. Have you ever owned a cat?
8. Have you ever done any work in the meat production industry, such as raising or slaughtering animals for food?
9. What sort of activities do you enjoy in your spare time?
10. Have you ever been charged with any acts of animal cruelty?
11. Have you ever shot or killed an animal?
12. (If the answer to question #11 was yes) What were the circumstances?
13. Do you believe animals can suffer pain?
14. Do you believe that cruelty to animals is wrong?
15. Do you agree with the law that forbids criminal acts against animal shelters?
16. I am sure you realize that a criminal trial is a search for the truth and not a personality contest between opposing counsel?
17. The defendants are entitled to a fair trial. Do you believe you can judge them fairly?
18. The State is also entitled to have twelve open minded jurors who are fair, unprejudiced and unbiased. Do you believe you can be that type of juror?
19. An accomplice is a person who testifies to his participation in a crime and also testifies to the participation of others in that crime. Would that fact alone cause you to be biased or prejudiced against such a witness?
20. Would the fact that witness is an accomplice cause you to arbitrarily reject his testimony?
21. If the courts tell you at the close of all the evidence that the testimony of an accomplice should be regarded with distrust and acted upon with caution, would that cause you to automatically to reject the testimony of the accomplice?
22. If the court instructs you that the testimony of an accomplice is competent legal evidence, will you consider it?
23. If you feel that you would be prejudiced or biased (name) is an accomplice, you will tell us now, won't you?
24. You understand that it is only important whether you believe the accomplice, not whether you like or admire him?
25. You have probably heard sayings like "to err is human, to forgive divine," and "boys will be boys." As a juror it is not within your responsibilities to forgive or excuse. You understand, don't you, that your sole responsibility is to determine the question of innocence or guilt?
26. Has the amount of pre-trial publicity concerning this case made you form an opinion as to the guilt or innocence of the individuals in this case?