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JUDICIAL COURT
BALTIMORE CITY
CRIMINAL DIVISION

STATE OF MARYLAND

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IN THE
CIRCUIT COURT FOR
BALTIMORE CITY

CASE NO.: 115141037

v.

WILLIAM PORTER

* * * * *

PROPOSED ADDITIONAL VOIR DIRE¹

EDUCATION & MILITARY

1. Did you attend high school in Baltimore City? ____ If yes, did you graduate and if so, when did you graduate? _____.
2. Have you received training in law enforcement, the law, or the court system? ____
3. Have you ever considered working in law enforcement? ____ If yes, explain _____.
4. Have you ever served in the military? ____
5. Do you have any training or experience in the medical field? If yes, explain _____.

POLITICAL, RELIGIOUS AND OTHER AFFILIATIONS

6. Have you or any members of your family or close friends ever contributed money to the political campaign for State’s Attorney Marilyn Mosby?
7. Have you or any members of your family or close friends ever contributed money to the city council and/or mayoral political campaign for Nick Mosby?

CASE SPECIFIC QUESTIONS

8. Has anyone spoken to you about sitting as a member of this jury? ____ If yes, explain
9. Do you own property in Baltimore City? ____ If yes, do you have strong feelings about how the verdict in this case could affect your property and/or your property value?

10. Do you own a business in Baltimore City? ____ If yes, was your business affected by the weeklong curfew and/or the civil unrest following the death of Freddie Gray? _____

¹ This proposed additional *voir dire* is filed under seal and as a supplemental request to the *voir dire* as already provided by this Honorable Court.

11. Do you have strong feelings about how the verdict in this case could affect your business and/or financial livelihood? _____
12. Because there is a civil settlement, do you believe the Baltimore City Police Officer charged in the criminal case is guilty? _____
13. Do you have strong feelings about the civil settlement such that you believe the amount paid by the city was too much, not enough, or appropriate? _____ if yes, explain _____
14. Were you, a relative, or close friend involved in the "Black Lives Matter" movement? _____
If yes, do you have strong feelings about the way in which that movement is affected by the death of Freddie Gray and/or the way in which the death of Freddie Gray affected that movement? _____
15. Do you believe that the way in which the State's attorney's office handled the charges directly affected the decrease in civil unrest/riots/protests? _____ If yes, explain _____
16. Have you, a relative, or close friend been the victim of police brutality? _____ If yes, explain. _____ Did you, a relative, or close friend file a complaint or internal affairs complaint arising out of the incident? _____ If yes, were you satisfied with the way in which law enforcement handled the complaint or report? _____
17. Do you believe that race affects the likelihood of someone being a victim of police brutality? _____
18. Do you believe that the Baltimore City Police Department treats black citizens different than white citizens? _____
19. Have you heard, read, or seen any information relating to these events? _____ If yes, please tell us what this information is, and the source. _____
20. Have you formed any impressions or opinions that would influence your ability to be fair to both sides in this case? _____ If yes, please explain. _____
21. If you have formed impressions or opinions about this case, can you set them aside and decide the case based solely on the evidence presented in court? _____
22. Have you seen, heard or read anything about the Baltimore City Police Department or the Baltimore City Police Department's response to this case? _____. If yes, explain _____

23. Please describe the extent to which you are familiar with the area of Sandtown, Gilmore Homes and/or Pennsylvania and North Avenue in Baltimore City _____
24. Do you believe police officers tend to treat criminal suspects differently in low income neighborhoods than in middle or high income neighborhoods? ___ If yes, explain ___

CRIME VICTIMS/CHARGES

25. Defendant William Porter is African American. The alleged victim, Freddie Gray, was African-American. Can you judge this case fairly without consideration of the race of the persons involved? ___ If no, explain _____
26. Have you, friends or relatives ever been arrested by a Baltimore City Police Officer? ___
27. If you, friends, or relatives have ever been arrested by a Baltimore City Police Officer, have you been placed in a transport vehicle (either van or patrol type vehicle), and if so, were you seatbelted? _____
28. Should police officers be treated differently than civilians if they break the law? _____
29. Do you have knowledge of police procedures or methods from any source? _____
30. Do you personally know anyone that was killed while in police custody?
31. Have you ever had any positive, or negative, experience(s) with Baltimore City police officers or other law enforcement agents? ___ If yes, explain _____
32. Have you ever witnessed the police use force on someone? ___ If yes, explain ___
- Did you feel the police officer(s) acted appropriately? ___ If no, explain _____
 - Did you believe the force was necessary? ___ Explain _____
33. Have you or a close friend or relative ever been mistreated by the police? _____
- Describe what happened _____
 - Was the incident reported to officials? _____
 - Was anyone prosecuted or disciplined? ___ Explain _____
34. Have you ever filed a complaint about a police officer? _____ If yes, explain ___
35. Do you have any feelings about the prosecution of police officers who are charged with committing crimes? ___ If yes, explain _____
36. Do you believe that because the defendant was a police officer and is now charged with a crime, that he is probably guilty? ___ Yes ___ No ___ Maybe ___ Don't Know


JURY DUTY

37. Would you like to serve on **this** jury? _____
38. If you are selected as a juror in this case, do you anticipate any negative reactions by friends or family if you find the defendant **not** guilty? _____ Please explain.
39. If you are selected as a juror in this case, do you anticipate any negative reactions by friends or family if you find the defendant guilty? _____ Please explain

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing **Proposed Additional Voir Dire** was emailed on November 12, 2015 and hand-delivered to the Office of the State's Attorney for Baltimore City on this 12th of November, 2015.


Gary E. Proctor