

[Signature]
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA,)	
)	
)	
v.)	Criminal Action No. 20-CR-00433
)	
WILLIAM RODERICK BRYAN,)	
Defendant.)	

MOTION FOR SPECIAL JUROR QUESTIONNAIRE

COMES NOW Defendant William Roderick "Roddie" Bryan, by and through undersigned counsel, pursuant to the Fifth, Sixth and Fourteenth Amendments to the United States Constitution, Article I, Section I, Paragraph I of the Constitution of the State of Georgia, and other applicable law, and files this his motion for Special Juror Questionnaire. In support of said motion, Defendant respectfully submits that completion of the special jury questionnaire attached hereto as Exhibit "1" prior to jury selection would facilitate more informed jury selection by the parties, expedite the jury selection process, and minimize embarrassment and inconvenience to potential jurors.

WHEREFORE, Defendant prays that the motion be granted.

So noted, this 16th day of July, 2020.

/s/ Kevin Gough
Kevin Gough
ATTORNEY FOR DEFENDANT
Georgia Bar No. 303210

Kevin Gough Firm, LLC
501 Gloucester Street, Suite 121
Post Office Box 898
Brunswick, GA 31521
(912) 242-5114
kevingough.firm@gmail.com

CERTIFICATE OF SERVICE

COMES NOW Kevin Gough, attorney for the defendant, and hereby certifies that a copy of the foregoing document(s) have been served upon the District Attorney by email delivery this date.

This 16th day of July, 2020.

/s/ Kevin Gough

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA,

)
)
)
)
)
)
)
)
)
)

v.

Criminal Action No. 20-CR-00433

WILLIAM RODERICK BRYAN,
Defendant.

CONFIDENTIAL JUROR QUESTIONNAIRE
CONFIDENTIAL JUROR QUESTIONNAIRE INSTRUCTIONS FOR JUROR

The attached questions must be answered by you. They will assist the Judge and the lawyers in selecting a jury. Your complete written answers will save a great deal of time for the Court, for the lawyers and for you.

Take your time. Answer all the questions to the best of your ability. **DO NOT ASK FOR HELP.**

There are no right or wrong answers. The only requirement is that the answers be full and honest.

We need your candid answers so that we pick a fair and impartial jury for a trial involving criminal accusations. The Judge and the lawyers realize that every person has beliefs and prejudices concerning many things. You should answer with your true feelings, whatever they may be. Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

Do not assume anything from these questions.

EXHIBIT "1"

JUROR QUESTIONNAIRE
(Please make certain your answers are legible)

1. Full name: _____ Age: _____

2. Date of birth: _____ Place of birth: _____

3. Current residence (Part of town not specific address) _____

How long? _____

4. How long have you lived in Georgia? _____

5. Please list the cities and states you have resided in for the last ten years:

6. Please list the level and extent of your education. (Colleges, Tech. School, etc.)

If you attended college or vocational school what was your major?

7. Please list current occupation: (If unemployed or retired list your usual occupation)

A. Location of current employment: _____

B. Length of current employment: _____

C. Do you supervise others? _____ How many? _____

D. Have you ever supervise others? _____ How many? _____

E. Brief job description: _____

8. Do you attend a church or synagogue? _____ If yes, what denomination? _____

How often do you attend? _____

9. Current marital status: (Circle the one that applies) Single Married

Living With Someone Widowed Separated Divorced Remarried

A. If married or remarried, how long: _____

B. If separated, divorced or widowed, how long: _____

C. If living with someone, how long: _____

10. If married or living with someone, what is their present or usual occupation?

11. If married or living with someone, what is the level of their education and what was their course of study? _____

12. Have you ever served in the armed forces? _____

A. Branch of service and highest rank: _____

B. Dates and places of service: _____

C. List any honors or disciplinary actions: _____

13. Please complete the following chart regarding your children, if applicable:

NAME	AGE	EDUCATION	OCCUPATION
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

14. Do your children attend public or private school? _____

15. What are/were your parents occupations?

A. Mother: _____

B. Father: _____

C. Stepfather: _____

D. Stepmother: _____

16. Please list any civic, political, social, professional or religious organizations to which you belong and any offices you hold or have held in those organizations:

17. Do you belong to a neighborhood watch group or any other crime prevention organization? _____

If yes, please list: _____

18. Have you, any member of your family or friends ever taken any courses in law, criminology, law enforcement, criminal justice or other law related areas? _____

If yes, please list who and what courses: _____

19. Have you or any member of your family ever had any medical training? _____

If yes, please explain: _____

20. Have you, any member of your family or close friends ever taken any courses or had any training in psychology, psychiatry, sociology, social work or counseling? _____

If yes, please explain: _____

21. There is a possibility that a psychologist or psychiatrist may take the stand, do you have any strong feelings about these professions that would make it difficult for you to accept their testimony? If so, please explain:

22. Have you, any members of your family or close friends ever worked in or applied for a position in law enforcement, the District Attorney's office or any other law enforcement related agency? _____

If yes, when, where and what agency? _____

23. Are you, any member of your family or close friends associated with any federal, state, or local law enforcement agency personnel or other governmental officers or officials? (Sheriff's, Deputies, Police Officers, State Patrol, Border Patrol, U.S. Attorneys or the Courts) _____

If yes, list names, position and your relationship to them. _____

24. Have you ever served on a jury before? _____
- A. If yes, how many times? _____
- B. For each time you have served, please list the type of case and dates:

- C. Did you reach a verdict in each case? _____

- D. How did you feel about that (those) experience(s)? _____

- E. Were you ever the Foreperson? _____
25. What did you like or dislike about your prior jury service? _____

26. Regarding your jury service: (Circle the letter(s) which apply to your)
- A. I can tell pretty easily when a person is telling a lie.
 B. When I make up my mind, I rarely change it.
 C. I am easily influenced by the opinion of others.
 D. I always follow my own ideas, rather than do what others expect of me.
27. Please circle the letter of the statement that best suits you.
- A. I like assuming a leadership role in a group of people.
 B. I tend to step in and take an active role in solving disagreements between people.
 C. I tend to "speak my mind" in group discussions.
 D. I prefer to listen rather than speak in group discussions.
 E. I dislike being involved in group discussions where there are disagreements.
28. Have you ever appeared before a Grand Jury? _____
- If yes, please give dates and details: _____

29. Have you ever been to court before? _____
 If yes, under what circumstances? _____

30. What is the first thing that comes to your mind when you think of:
 A Defense Attorneys: _____
 B Prosecutors: _____
31. Have you or anyone you know ever testified? _____
 If yes, please describe: _____

32. Have you, any member of your family or close friends ever been involved in a lawsuit?

 If yes, (Circle one or more) Plaintiff Defendant or Witness
 A. Please describe what that experience was like for you: _____

33. Have you or a family member ever sued someone or wanted to sue someone? _____
 If yes, please describe: _____

34. Has anyone ever sued you or a family member? _____
 If yes, please describe: _____
 What was the nature of the case? _____
35. In your opinion, what are the three (3) most important problems with law and order today?
 No. 1: _____
 No. 2: _____

No. 3: _____

36. What is the main problem in our society today? _____

37. What in your opinion is the principal cause of crime in America today? _____

A How serious a problem is crime in your neighborhood? _____

38. What in your opinion should or could be done about the crime problem? _____

39. Have you, a member of your family, or close friend ever been the victim of physical or domestic violence? If yes, please tell us about that:

40. Have you, any family member, or friend ever been a witness in a criminal case? _____

If yes, what was the nature of the case? _____

41. Have you, any member of your family or close friends ever been the victim of a crime?

If yes, please explain: _____

42. If you, a family member, or friend have been a victim of any crime, was anyone charged with the offense against you, your family member, or friend? _____

If yes, was that person prosecuted in court and what was the result? _____

43. Please list all newspapers, magazines or periodicals you regularly read or subscribe to:

44. What have you heard or read about this case? _____

45. What was your reaction to what you heard or read? _____

46. What criminal cases have you followed in the media? _____

Why did you follow the case(s)? _____

47. How many hours do you spend each week watching television? _____

48. Please list your three favorite television shows: _____

49. Do you read in your spare time? _____

A If yes, what authors and types of books do you tend to read? _____

B What were the last three books you read? _____

C. What were they about? _____

50. What radio station(s) do you listen to in your car or home? _____

51. Have you ever been charged, arrested, indicted, or convicted of any criminal offense?

52. Have you personally felt fearful of being victimized by violent crime or been fearful that members of your family would be victimized? _____

If yes, describe those fears: _____

53. What steps do you think people who are frightened about crime should take to protect themselves? _____

54. What steps have you taken to protect yourself? _____

55. Have you, any member of your family or close friends ever had a problem with drugs or alcohol? _____

If yes, please tell us about that: _____

56. Do you think it would be difficult for your to remain fair and objective in the trial of a defendant who is a drug dealer? _____

57. Have you ever heard the statement, he looks like a criminal? _____

If, yes, do you think that if someone "looks like a criminal" they are probably guilty if they are arrested for a crime? Why/why not? _____

58. Do you know anyone who has had a bad experience involving guns? _____
If yes, please tell us about that. _____

59. Have you ever owned any firearms? _____
If yes, what type(s) and what is the main reason for owning it/them _____

60. Do you or any member of your family belong to any pro-gun or anti-gun organizations?

If yes, what organization(s)? _____

61. What is the condition of your hearing? _____
What is the condition of your eyesight? _____
If you have a condition, briefly state the nature of the problem(s) _____

62. Do you have any health problems which could affect your ability to serve on this jury?

If yes, briefly state the nature of the problem(s). _____

63. Do you take any prescription medication(s) of any kind? _____
If yes, which one(s)? _____

64. Are you now suffering or have you ever suffered from a medical problem or long term disability? _____

If yes, please explain: _____

65. Is there any reason why you would not want to serve as a juror in this case? _____

If yes, please explain: _____

66. Have you, any member of your family or close friends ever run for or held a political office? _____

If yes, what office and where? _____

67. Do you have any pressing personal or business plans or problems which would prevent you from giving your full attention to this case if you are chosen to serve as a juror? _____

If yes, please explain: _____

68. Is there anything else we should know about you? _____

69. Is there anything you would like to discuss privately with the court? _____

If yes, please explain: _____

EXPLANATION SHEET

If you feel that in the spaces provided you were unable to sufficiently answer any particular questions, please use this sheet to provide that information. Thank you very much for your cooperation.
