

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA

Plaintiff,

vs.

No. CR 06.538 JCH

DANUEL QUAINTANCE,

Defendant.

DEFENDANT DANUEL QUAINTANCE REQUESTED VOIR DIRE

The defendant, Danuel Quaintance, by and through his attorney, Jerry Daniel Herrera, Attorney, hereby provides notice to the court and counsel for the U.S. Government of his requested voir dire in the above-referenced and numbered cause.

1. Is anyone in the panel familiar with anyone who is employed by or related to anyone in the Office of the U.S. Attorney?
 - 1a. If so, what is the nature of the relationship?
2. Is anyone in the panel familiar with anyone who is employed by or related to anyone in the Drug Enforcement Agency?
 - 2a. If so, what is the nature of the relationship?
3. Is anyone familiar with anyone who is employed by or related to any employee with the U.S. Border Patrol?
 - 3a. If so, what is the nature of that relationship?
4. Is anyone in the panel familiar with anyone who is employed by or related to

anyone in law enforcement?

- 4a. If so, what is the nature of the relationship?
5. Is anyone in the panel familiar with anyone who is employed by or related to anyone in law enforcement?
- 5a. Is anyone familiar with Danuel Quaintance or Mary Helen Quaintance?
6. Has anyone in the panel ever been arrested or charged with any crime involving the alleged possession of a controlled substance?
- 6a. If so, please state:
 - a. The drug involved;
 - b. When this occurred;
 - c. Was there a prosecution?
7. Does anyone in the panel have any friends or relatives who have ever been arrested for a crime involving the alleged possession of a controlled substance?
- 7a. If so, please state:
 - a. The drug involved;
 - b. When this occurred;
 - c. Was there a prosecution?
8. Has anyone in the panel ever been the victim of a crime?
- 8a. If so, when;
- b. Which crime?
- c. When this occurred;
- d. Did this result in a prosecution?

9. Does anyone on the panel have any friends or relatives that have ever been the victim of a crime?
 - 9a. If so, state which friend(s) or relative(s):
 - b. Which crime?
 - c. Did this result in a prosecution?
 - d. When this occurred?
10. Is anyone on the panel from the Lordsburg or Deming area?
11. Is anyone familiar with State Highway 113 at Interstate Highway 10?
12. Does anyone on the panel have any particularized knowledge of marijuana.
13. Is anyone on the panel familiar with the following people who may testify in this matter? Read Gov't Witness list.
14. Does anyone on the panel have any strong beliefs either way about the use of marijuana or the legalization of marijuana?
 - a. what are those beliefs?
15. Does anyone on this panel know anyone who's ever been arrested or prosecuted for possession of marijuana?
16. Does anyone on the panel know anyone who has been prosecuted for any criminal actions?
17. Does everyone on the panel know that if the government fails to prove the guilt of Mr. Quaintance to a standard known as reasonable doubt, that they would be required to vote not guilty?
18. Does anyone on the panel have any difficulty in adhering to the standard of proof beyond a reasonable doubt?

19. Does anyone on the panel have any difficulty with the requirement that the jury verdict must be unanimous?
- 20 Does anyone on the panel believe that either the standard of proff beyond a reasonable doubt or the requirement of a unanimous verdict is too high or unfair?

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I hereby certify that this pleading was filed electronically on the Court's Electronic Filing System on this 11th day of August, 2008.

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