

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES	)	
	)	
v.	)	
	)	INDICTMENT NO.
CARLA JACKSON,	)	1:20-CR-00296-JPB-CMS-05
Defendant	)	
_____	)	

DEFENDANT’S PROPOSED VOIR DIRE QUESTIONS

COMES NOW, the Defendant, CARLA JACKSON, in the above-styled action, by and through undersigned counsel, pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, and requests that counsel for the defense be permitted to propound the following *voir dire* questions:

VOIR DIRE QUESTIONS

Small Business Administration (“SBA”)

- (1) Has anyone here ever worked for the Small Business Administration (“SBA”)? If so, in what capacity and when? Why did you leave (if prospective juror no longer works there)? Did your experience working for the SBA color your impressions of the agency? How so?
- (2) Has anyone here had a close friend or family member who worked for the SBA? (Same follow-up questions)

- (3) Is there anyone here who has received any loans or financing through the SBA or through any of its programs? How was that loan process handled?
- (4) Has anyone here ever had a very positive or negative experience with the SBA or any of its programs? Please explain.
- (5) How about mistakes made by the SBA? Has anyone here been touched by a situation in which the SBA made an error in any of its loan programs? Please explain.
- (6) Has anyone here in their professional or personal life had experience litigating issues against the SBA?
- (7) Is there anyone here who thinks the Small Business Administration is incapable of making a mistake?

Small Business Owners

- (8) Are any of you current or former small business owners?
- (9) For those of you who are or who have been small business owners, have you ever applied for bank loans, or other types of financing, for those businesses? If so, please describe.

Paycheck Protection Program (“PPP”)

- (10) Do any of you know anything about the “Paycheck Protection Program,” sometimes referred to as “PPP”? If so, what do you know about PPP?

- (11) Have any of you personally ever applied for a loan through the Paycheck Protection Program? If yes, please explain.
- (12) Has any business that you were (or are) associated with ever applied for a loan through the Paycheck Protection Program? If yes, please explain.

Prior bank or loan experience

- (13) Have any of you ever worked at a bank or at a financing company?
- a. If so, did you ever handle or process loan applications while working there? Describe the loan approval process.

Law Enforcement

- (14) Does anyone here work in law enforcement themselves or have close family members who work in law enforcement?
- (15) Do you or any members of your family know anyone in the following categories:
- a. People who work for the United States Attorney's Office, either presently or in the past, in this district or anywhere else?
- b. People who work for other prosecutorial agencies?
- c. Any person associated with any investigative agencies like the Federal Bureau of Investigation, the GBI, or any investigative agency whether federal or state? Does this person discuss his or her cases with you?

d. People who work in prisons or jails?

(16) Has anyone here ever attended a police academy or considered working for any law enforcement agency?

(17) Has anyone here ever served as a law enforcement officer in the armed forces of any country?

Legal Training/Lawyers

(18) Is there anyone here who is trained in and/or works in the legal field?

Please tell us about that.

(19) Is there anyone here who hates all lawyers? Most lawyers? Me?

The Juror Experience/Knowledge of the Legal System

(20) If selected to serve in this case, each of you will be required to consider and weigh the evidence. If a considerable number of jurors were voting differently than you, would you change your verdict for that reason alone?

(21) Would you tend to believe or disbelieve the testimony of a law enforcement officer merely because of the person's status as a law enforcement officer or because you believe that they serve such a vital role in our society?

(22) Are you a person who tries to follow major criminal trials? If yes, which criminal trials have you followed in the past, or do you follow now?

(23) Have you ever been a witness to a crime? If so, do you think there was anything about that experience which would affect your ability to fairly and impartially evaluate this case?

(24) Have you ever participated in any efforts to either increase or lessen the punishment of individuals who are convicted of criminal offenses?

(25) Do you think that an innocent person can be made to look guilty? If yes, please give me an example of that.

(26) Have you ever been falsely accused of something? If yes, please tell us about that.

Innocence and Other Issues

(27) Do you feel that because an indictment has been returned against Ms. Jackson that she must be guilty of something?

(28) Ms. Jackson is presumed innocent under the law. How do you feel about the presumption of innocence? Would you change that law?

(29) Do you agree with the legal principle that the burden of proof is always on the government, and that the defendant does not have to present any evidence on her own behalf or prove that she is innocent?

(30) Do you feel that if a defendant is truly innocent then she should testify at trial, or that if a defendant does not testify then she must be guilty or must be hiding something?

(31) If you are selected as a juror on this case, you must have the ability to make your own independent decision about the defendant's guilt or innocence. Is there anyone who feels they could not do this?

(32) If you or a member of your family were a party to this case or one like it - on either side - would you be willing to have your case tried, or theirs, by people in the same frame of mind as you are now?

(33) After everything you have heard so far, is there anyone here who would feel uncomfortable about serving on this jury?

(34) Does everyone here understand that not everything that you may feel is wrong is illegal?

(35) If the Government fails to prove that what Ms. Jackson did was illegal, but you believe in your heart that it was wrong, would you have any hesitation whatsoever voting to acquit her?

Respectfully submitted this 2nd day of January, 2024.

/s/ David D. Marshall
David D. Marshall
Attorney for Defendant
Georgia Bar No. 471517

2550 Sandy Plains Road
Suite 225 PMB 349
Marietta, Georgia 30066
(404) 213-1358 (phone)
ddmarshall98@gmail.com

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES	)	
	)	
v.	)	
	)	INDICTMENT NO.
CARLA JACKSON,	)	1:20-CR-00296-JPB-CMS-05
Defendant	)	
_____	)	

CERTIFICATE OF SERVICE

This is to certify that the foregoing was formatted in 14-point Times Roman, in accordance with Local Rule 5.1C, and was electronically filed this day with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following:

All defense counsel; All AUSA's of record

This 2nd day of January, 2024.

/s/ David D. Marshall
David D. Marshall
Attorney for Defendant
Georgia Bar No. 471517

2550 Sandy Plains Road
Suite 225 PMB 349
Marietta, Georgia 30066
(404) 213-1358 (phone)
ddmarshall98@gmail.com