

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-20290-CR-BLOOM(s)

UNITED STATES OF AMERICA

vs.

ERIC DEAN SHEPPARD,

Defendant.

**UNITED STATES' RESPONSE TO DEFENDANT'S
MOTION FOR A WRITTEN JURY QUESTIONNAIRE**

The United States of America, through the undersigned Assistant United States Attorney, files this response to the defendant's motion for a written questionnaire in order to clarify the government's position regarding the defendant's motion.

The government opposes the procedure the defendant is asking the Court to adopt for the jurors to answer the defendant's proposed questionnaire. Jury duty is a service that many people find to be a burden on their personal lives and their finances, particularly if they are self employed. The government does not believe that additional burdens should be placed on the jurors by requiring them to come to the courthouse a day ahead of the defendant's proposed trial schedule and fill out the defense questionnaire so that the parties can have a full day to digest the jurors' responses.

This is not Enron; this is not a high profile case. This is not a case that requires extensive voir dire that should begin a day ahead of the normal trial schedule. The government believes the defendant can propose his voir dire questions to the Court, and if the questions are not asked by the Court, the defendant's counsel can ask the jurors the questions they deem appropriate during

the time allotted to them for voir dire.

For these reasons, the government respectfully requests that the proposed voir dire procedure offered in the defendant's motion for a written jury questionnaire be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 18, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

s/Aimee Jimenez
Aimee C. Jimenez
Assistant United States Attorney