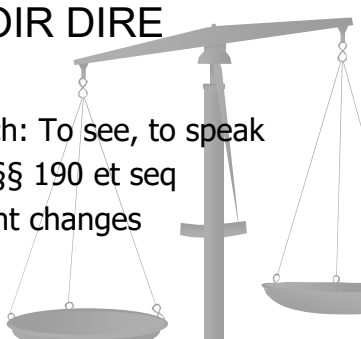


VOIR DIRE

- French: To see, to speak
- CCP §§ 190 et seq
- Recent changes

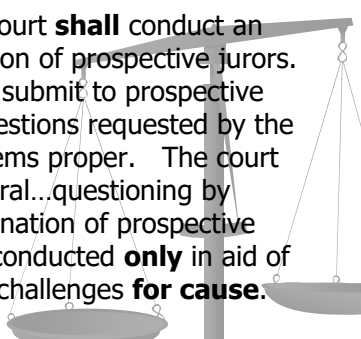


1

CCP § 223

Voir Dire in Criminal Cases

- 2001 – 2017: Court **shall** conduct an initial examination of prospective jurors. The court **may** submit to prospective jurors addtl questions requested by the parties as it deems proper. The court **may** limit the oral...questioning by counsel. Examination of prospective jurors shall be conducted **only** in aid of the exercise of challenges **for cause**.

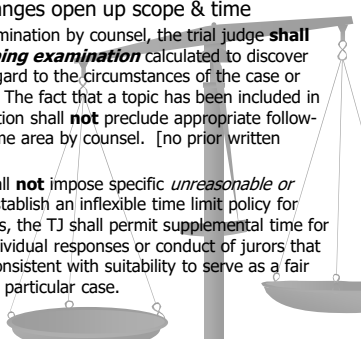


2

CCP § 223

Voir Dire in Criminal Cases

- January 1, 2018: changes open up scope & time
- (b)(1): ...During any examination by counsel, the trial judge **shall** permit **liberal and probing examination** calculated to discover bias or prejudice with regard to the circumstances of the case or parties before the court. The fact that a topic has been included in the trial judge's examination shall **not** preclude appropriate follow-up questioning in the same area by counsel. [no prior written submissions required]
- (b)(2) The trial judge shall **not** impose specific *unreasonable or arbitrary time limits* or establish an inflexible time limit policy for voir dire. As VD proceeds, the TJ shall permit supplemental time for questioning based on individual responses or conduct of jurors that may evince attitudes inconsistent with suitability to serve as a fair and impartial juror in the particular case.

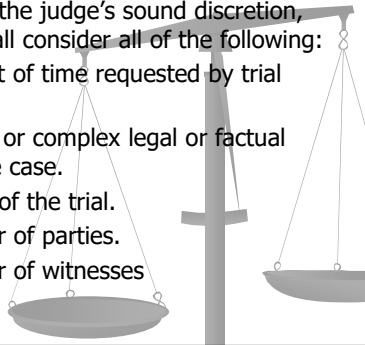


3

CCP § 223

Voir Dire in Criminal Cases

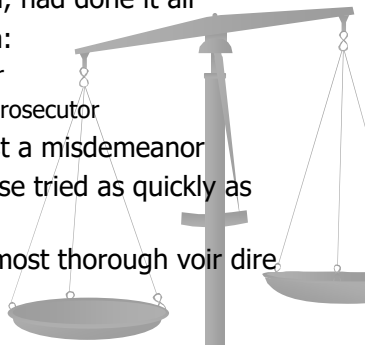
- (c) In exercising the judge's sound discretion, the trial judge shall consider all of the following:
 - (1) The amount of time requested by trial counsel.
 - (2) Any unique or complex legal or factual elements in the case.
 - (3) The length of the trial.
 - (4) The number of parties.
 - (5) The number of witnesses



4

TENSION

- Judge knows all, had done it all
- You are "just" a:
 - New prosecutor
 - Misdemeanor prosecutor
- Your case is just a misdemeanor
- Judge wants case tried as quickly as possible
- You want the most thorough voir dire possible



5

EDUCATE/ADVOCATE

- Consider a pre-prepared motion to:
 - Educate judge on current voir dire law
 - Advocate for more time or latitude to question jurors
 - Explain issues in case/law supporting your request



6

VOIR DIRE IS CRITICAL

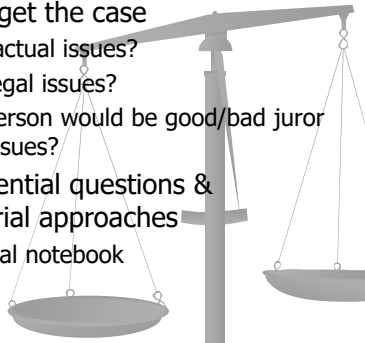
- Defense wants at least 1 BAD juror, you need 7+ GOOD jurors
 - Only chance to weed out jurors with issues
- First impressions important
- PRIORITY # 1 – kick the crazies
- PRIORITY #2 – address your bad facts
- PRIORITY #3 – educate and ingratiate



7

WHEN TO START THINKING ABOUT VOIR DIRE

- When you first get the case
 - What are the factual issues?
 - What are the legal issues?
 - What kind of person would be good/bad juror based on the issues?
- Keep list of potential questions & add/delete as trial approaches
 - In the file or trial notebook



8

BEFORE TRIAL - INFORM YOURSELF ABOUT JURORS

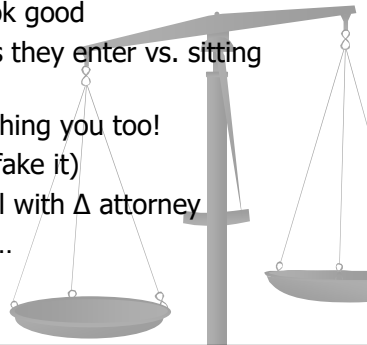
- How?
 - Jury list
- When?
- What to do with list? Consider...
 - Disseminate to fellow prosecutors
 - Disseminate to arresting agency
 - Run local criminal history (Support staff)



9

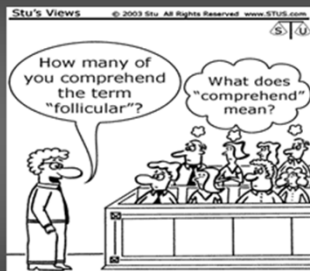
FIRST IMPRESSIONS

- Dress good, look good
- Observe jury as they enter vs. sitting straight ahead
- Jurors are watching you too!
- Be relaxed (or fake it)
- Act professional with Δ attorney
- No legal speak...



10

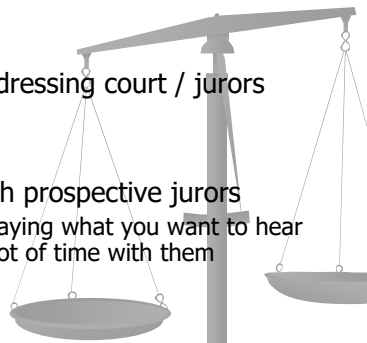
Talk Normal!



11

FIRST IMPRESSIONS

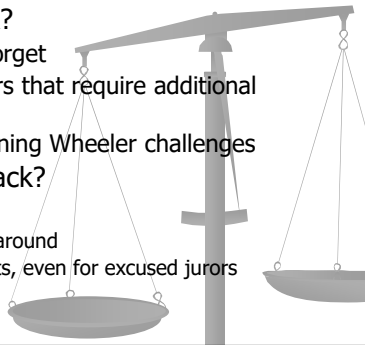
- No legal speak
- Stand when addressing court / jurors
- Be yourself
- Eye contact
- Don't argue with prospective jurors
 - If they're not saying what you want to hear don't spend a lot of time with them



12

JUROR INFORMATION

- What information to keep track of...
- Why keep track?
 - So you won't forget
 - To note answers that require additional questioning
 - Avoiding & winning Wheeler challenges
- How to keep track?
 - Post Its™
 - Easy to move around
 - Save all Post Its, even for excused jurors
 - Abbreviations



13

SUPERIOR COURT OF CALIFORNIA
Jury Selection Sheet

Plaintiff: _____
VS. _____
Docket: 08-49822
Date: 2.1.18

PEOPLE

1	2	3	4	5	6	7	8	9	10
11	12	13	14	15	16	17	18	19	20

PEREMPTORY

21	22	23	24	25	26	27	28	29	30
----	----	----	----	----	----	----	----	----	----

14

Johnson ♂

ret'd C.O.
W: social worker

F24
F26
F30
F31

V: other/rzpc
Sam-unfz
Self

crim-hms
crim-w 242

NAME ♂ or ★

occupation
spouse occup.
← kids
Observations here: moody, poor hygiene, etc.
LED:
other

Prior jury

15



16

JUDICIAL VOIR DIRE

- Standards of Judicial Administration § 8.5
- Judges usually do minimum questioning
 - Charge related
 - “Can you be fair and impartial?”
- General background
 - Note # of children, spouses, occupations, prior jury service
 - Law enforcement background
 - Victim of crime, accused of crime

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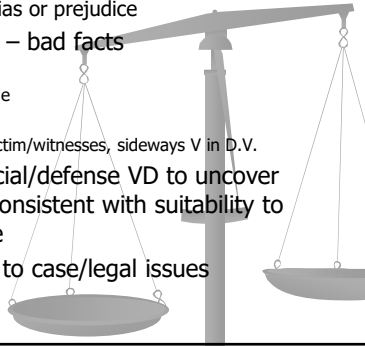
ATTORNEY INQUIRY

- Time limits
 - Court can control time (CCP § 223)
 - Must be equal
 - Use “court’s clock”
- Who goes first?
 - CCP: silent
 - Δ attorney should go first
 - Our burden
 - Allows prosecutor to react to defense questions

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ATTORNEY INQUIRY - GOALS

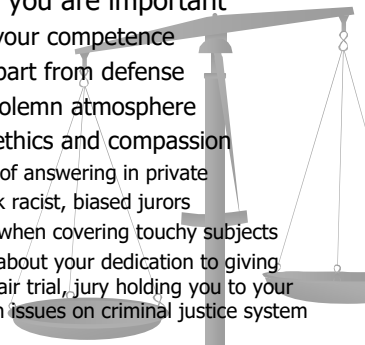
- Weed out fruitcakes
 - Determine their bias or prejudice
- Desensitize jurors – bad facts
 - Gory photos
 - Offensive language
 - Sexual content
 - Unsympathetic victim/witnesses, sideways V in D.V.
- Follow up on judicial/defense VD to uncover juror attitudes inconsistent with suitability to serve in your case
- Educate jurors as to case/legal issues



19

SETTING THE TONE

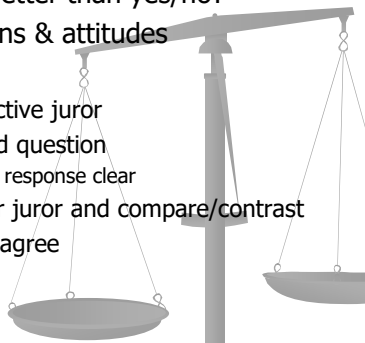
- Impressions of you are important
 - Demonstrate your competence
 - Set yourself apart from defense
 - Encourage a solemn atmosphere
 - Demonstrate ethics and compassion
 - Advise jurors of answering in private
 - Be first to kick racist, biased jurors
 - Change tone when covering touchy subjects
 - Educate jury about your dedication to giving defendant a fair trial, jury holding you to your burden, tough issues on criminal justice system



20

OPEN-ENDED QUESTIONS

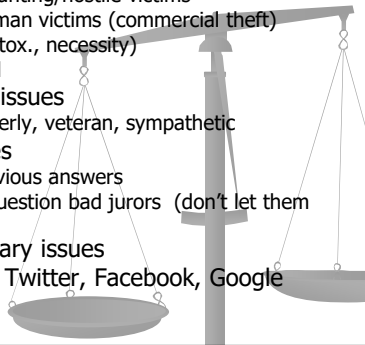
- What is? Why better than yes/no?
- Good for opinions & attitudes
- Here's how:
 - Choose prospective juror
 - Ask open-ended question
 - Follow up until response clear
 - Choose another juror and compare/contrast
 - Get balance to agree
- Examples:



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AREAS TO ADDRESS

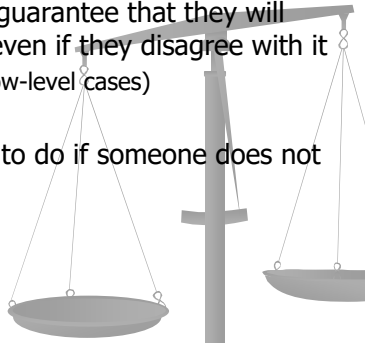
- Case issues (examples)
 - Unsympathetic/recanting/hostile victims
 - Crimes with no human victims (commercial theft)
 - Defenses (e.g. vol tox., necessity)
 - 192 victim = friend
- Defendant-related issues
 - Young, female, elderly, veteran, sympathetic
- Juror-specific issues
 - Based on their previous answers
 - Feel free NOT to question bad jurors (don't let them poison the pool)
- Miami CSI/evidentiary issues
- Access to internet, Twitter, Facebook, Google



22

Follow the Law

- Get a personal guarantee that they will follow the law even if they disagree with it
 - (especially in low-level cases)
- Tell them what to do if someone does not follow the law



23

YOUTHFUL JURORS

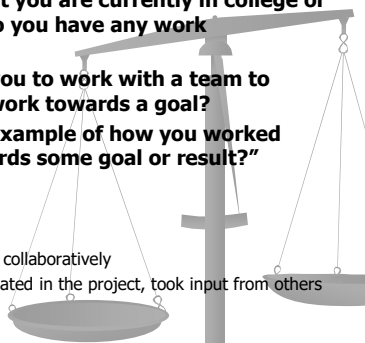
"Juror X, I noted that you are currently in college or not working etc... Do you have any work experience?"

Did the job require you to work with a team to resolve an issue or work towards a goal?

Can you give us an example of how you worked collaboratively towards some goal or result?"

A good juror will:

1. Understand the question
2. Have work experience
3. Have experience working collaboratively
4. Express that they participated in the project, took input from others
5. Have achieved their goal



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EVALUATING LIFE EXPERIENCE

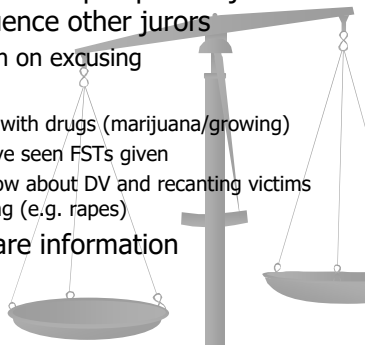
- Age v/s Inexperience
- Occupation vs. Unemployment
 - No lawyers
 - No law students
 - No paralegals/legal secretaries
 - Professors?
 - Felons?
 - Engineers?
 - Prior jury duty?



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FOLLOW UP QUESTIONS

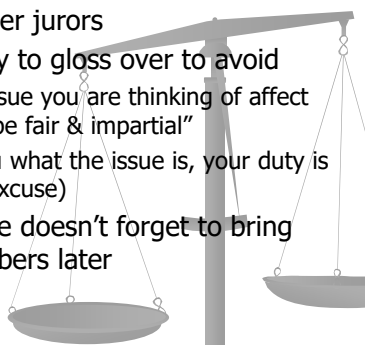
- Don't be afraid to use prospective jurors to educate/influence other jurors
 - Even if you plan on excusing
 - Examples:
 - Jurors familiar with drugs (marijuana/growing)
 - Jurors who have seen FSTs given
 - Jurors who know about DV and recanting victims or late-reporting (e.g. rapes)
- Get them to share information



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In-Camera inquiries

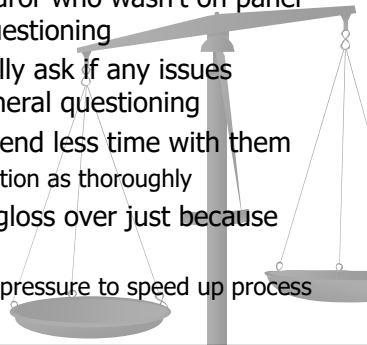
- Juror wants to address some issue outside presence of other jurors
- Some judges try to gloss over to avoid
 - E.g. "will the issue you are thinking of affect your ability to be fair & impartial"
 - Doesn't tell you what the issue is, your duty is to inquire (or excuse)
- Make sure judge doesn't forget to bring juror into chambers later



27

“NEWBIES”

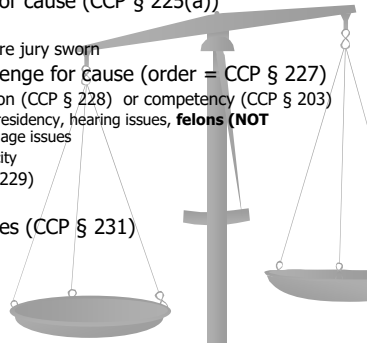
- A prospective juror who wasn't on panel during initial questioning
- Judge will usually ask if any issues arose...very general questioning
- Tendency to spend less time with them
 - Not you! Question as thoroughly
- Big mistake to gloss over just because court did
 - Court may put pressure to speed up process



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CHALLENGES

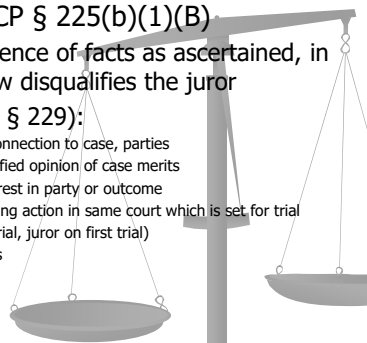
- Time to get rid of bad jurors!
- To the entire panel for cause (CCP § 225(a))
 - Rarely done
 - Done in writing, before jury sworn
- Individual juror challenge for cause (order = CCP § 227)
 - General disqualification (CCP § 228) or competency (CCP § 203)
 - Not a citizen, age, residency, hearing issues, **felons (NOT ANYMORE)**, language issues
 - some other incapacity
 - Implied bias (CCP § 229)
 - Actual bias
- Peremptory challenges (CCP § 231)



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CAUSE - IMPLIED BIAS

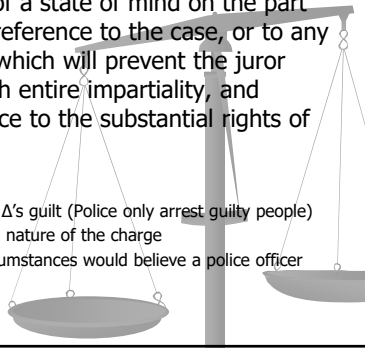
- Implied Bias CCP § 225(b)(1)(B)
 - When the existence of facts as ascertained, in judgment of law disqualifies the juror
 - Examples (CCP § 229):
 - Relationship/connection to case, parties
 - Having unqualified opinion of case merits
 - Having an interest in party or outcome
 - Having a pending action in same court which is set for trial
 - Prior juror (retrial, juror on first trial)
 - It happens



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CAUSE - ACTUAL BIAS

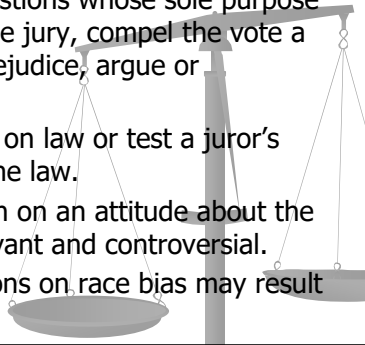
- Actual Bias CCP § 225(b)(1)(C)
 - The existence of a state of mind on the part of the juror in reference to the case, or to any of the parties, which will prevent the juror from acting with entire impartiality, and without prejudice to the substantial rights of any party.
 - Examples:
 - Opinion as to Δ's guilt (Police only arrest guilty people)
 - Bias based on nature of the charge
 - Under no circumstances would believe a police officer



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PROPER SUBJECT MATTER

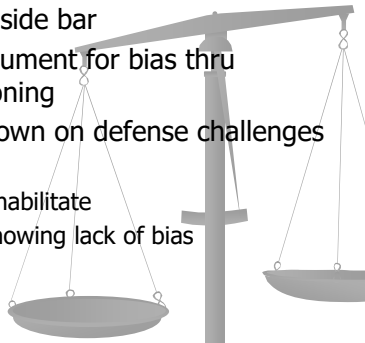
- Cannot ask questions whose sole purpose is to educate the jury, compel the vote a certain way, prejudice, argue or indoctrinate.
- Cannot instruct on law or test a juror's knowledge of the law.
- Cannot question on an attitude about the law unless relevant and controversial.
- Limiting questions on race bias may result in reversal



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CHALLENGES FOR CAUSE

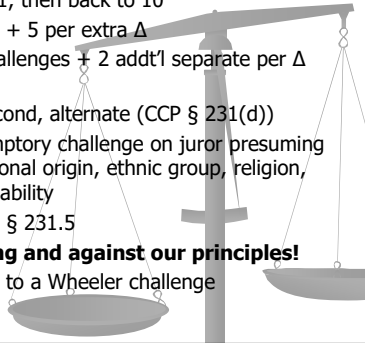
- Handled by the court at conclusion of questioning, at side bar
- Set up your argument for bias thru detailed questioning
- Don't just lay down on defense challenges for cause
 - Ask court to rehabilitate
 - Argue points showing lack of bias



33

PEREMPTORY CHALLENGES

- Each side gets 6 (misdemeanors)
 - Until January 2021, then back to 10
- General felonies: 10 + 5 per extra Δ
- Joint defendants: challenges + 2 add'l separate per Δ (10 total for 2 Δs)
- People go first, Δ second, alternate (CCP § 231(d))
- **Cannot** use a peremptory challenge on juror presuming bias b/c of race, national origin, ethnic group, religion, age, sex, color or disability
 - Prohibited by CCP § 231.5
 - **It's totally wrong and against our principles!**
 - It will subject you to a Wheeler challenge



34

EXCUSES – WHAT TO SAY

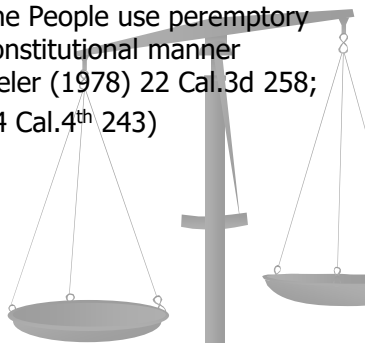
- "The People would like to thank and excuse Juror #5, Mrs. Smith"
- Eye contact
- Think ahead: don't make replacements move in to the box for no reason!
 - I'd like to save Mr. Johnson the walk and thank and excuse him...
- The Good Guy vs. the good juror
 - You have a great juror, but has some commitment that jury service will wreck...excuse?



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Presumption

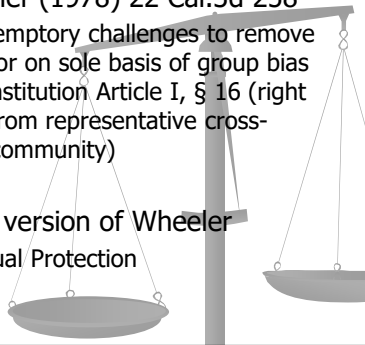
- Presumption: the People use peremptory challenges in constitutional manner (People v. Wheeler (1978) 22 Cal.3d 258; Ayala (2006) 24 Cal.4th 243)



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WHEELER CHALLENGES

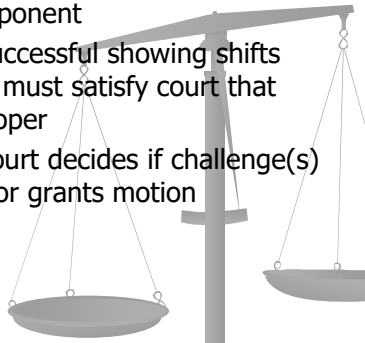
- People v. Wheeler (1978) 22 Cal.3d 258
 - The use of peremptory challenges to remove prospective juror on sole basis of group bias violates CA Constitution Article I, § 16 (right to jury drawn from representative cross-section of the community)
 - CCP § 231.5
- Batson: federal version of Wheeler
 - Violation of Equal Protection
- 3 prong test



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WHEELER

- 1ST PRONG: Challenge & prima facie showing by proponent
- 2nd PRONG: Successful showing shifts burden, People must satisfy court that challenge(s) proper
- 3rd PRONG: Court decides if challenge(s) proper, denies or grants motion

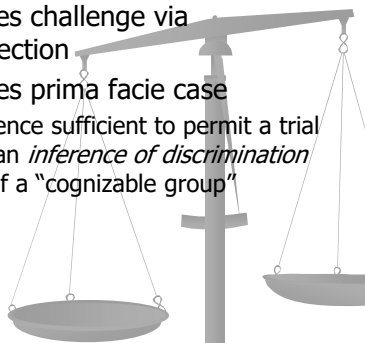


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WHEELER: PROCEDURE

First Prong

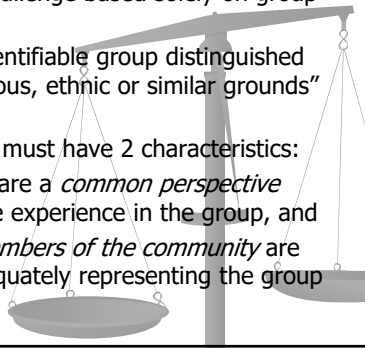
- Proponent makes challenge via appropriate objection
- Proponent makes prima facie case
 - producing evidence sufficient to permit a trial judge to draw an *inference of discrimination* on a member of a "cognizable group"



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COGNIZABLE GROUPS

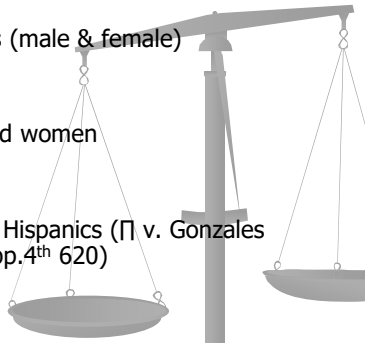
- Classifications of people that are constitutionally protected from challenge based solely on group membership
 - Must be "an identifiable group distinguished on racial, religious, ethnic or similar grounds" (Wheeler)
- Cognizable group must have 2 characteristics:
 - 1) members share a *common perspective* arising from life experience in the group, and
 - 2) *no other members of the community* are capable of adequately representing the group perspective



40

COGNIZABLE GROUPS

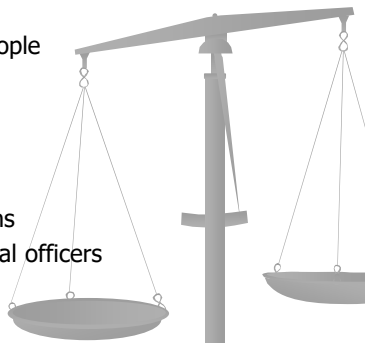
- Religious groups
- African-Americans (male & female)
- Hispanics
- Women
- Hispanic-surnamed women
- Men
- Gays & lesbians
- Spanish-speaking Hispanics (Pi v. Gonzales (2008) 165 Cal.App.4th 620)
- Ever changing



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NON-COGNIZABLE GROUPS

- Poor people
- People of color
- Less-educated people
- Blue-collar people
- Battered women
- Young adults
- People over 70
- Naturalized citizens
- Retired correctional officers

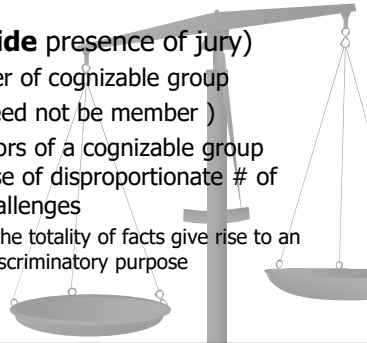


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WHEELER: PROCEDURE

First Prong

- Showing (**outside** presence of jury)
 - Juror is member of cognizable group (defendant need not be member)
 - Majority/all jurors of a cognizable group removed via use of disproportionate # of peremptory challenges
 - Showing that the totality of facts give rise to an inference of discriminatory purpose



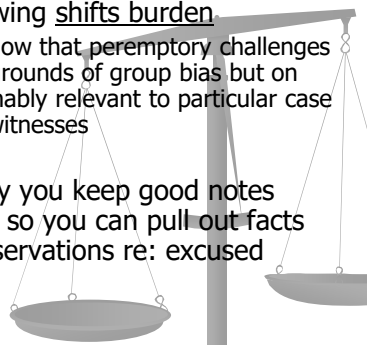
43

WHEELER: PROCEDURE

Second Prong

- Successful showing shifts burden
 - Burden = to show that peremptory challenges were NOT on grounds of group bias but on grounds reasonably relevant to particular case or it's parties/witnesses

NOTE: that is why you keep good notes during voir dire so you can pull out facts or issues or observations re: excused jurors

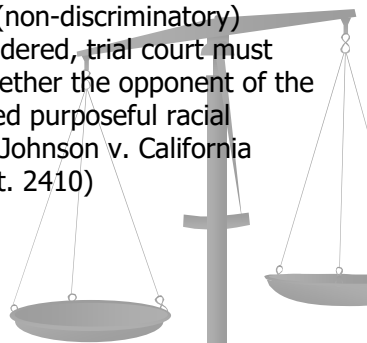


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WHEELER PROCEDURE

Third Prong

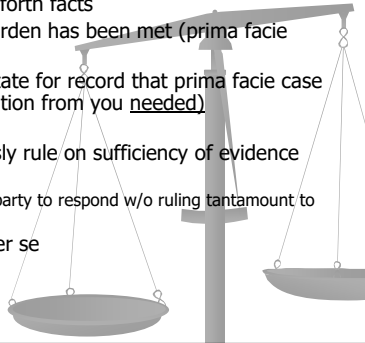
- If race neutral (non-discriminatory) explanation tendered, trial court must then decide whether the opponent of the strike has proved purposeful racial discrimination (Johnson v. California (2005) 125 S.Ct. 2410)



45

WHEELER: PROCEDURE

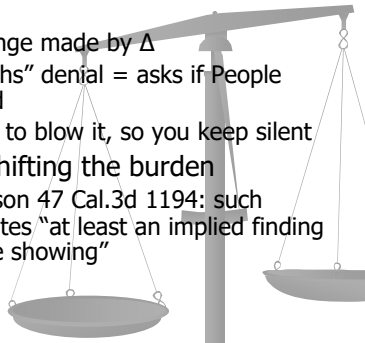
- Make Δ attorney set forth facts
- Inquire of court if burden has been met (prima facie case)
- You want judge to state for record that prima facie case **not** met (no explanation from you needed)
 - Beware of remands
- Court should expressly rule on sufficiency of evidence
 - Failure invites error
 - Allowing challenged party to respond w/o ruling tantamount to shifting burden
- Error = prejudicial per se



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THE WHEELER TRAP

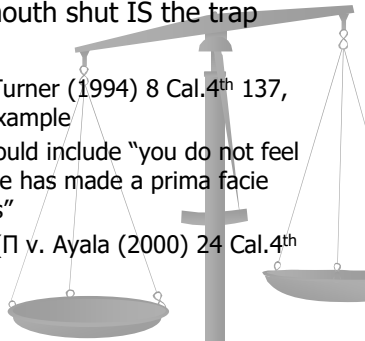
- Scenario:
 - Wheeler challenge made by Δ
 - Court “telegraphs” denial = asks if People care to respond
 - You don’t want to blow it, so you keep silent
- Court may be shifting the burden
 - People v. Johnson 47 Cal.3d 1194: such inquiry constitutes “at least an implied finding of a prima facie showing”



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AVOIDING THE TRAP

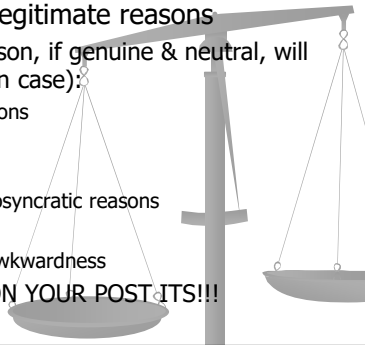
- Keeping your mouth shut IS the trap
- Make a record
 - See People v. Turner (1994) 8 Cal.4th 137, 167 for good example
 - Your record should include “you do not feel that the defense has made a prima facie showing of bias”
 - Not ex parte! (Π v. Ayala (2000) 24 Cal.4th 243)



48

REASONS TO EXCUSE

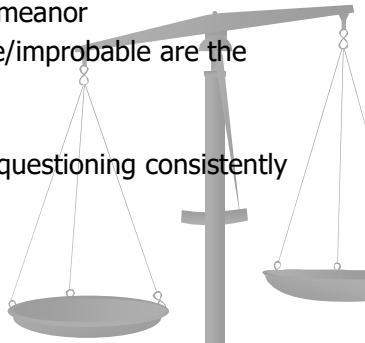
- Must provide clear & reasonably specific explanation of legitimate reasons
 - Even trivial reason, if genuine & neutral, will suffice (Johnson case):
 - Facial expressions
 - Gestures
 - Hunches
 - Arbitrary & idiosyncratic reasons
 - Demeanor
 - Attire, social awkwardness
- NOTE THESE ON YOUR POST-ITS!!!



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COURT LOOKS AT...

- Prosecutor's demeanor
- How reasonable/improbable are the explanations
- Lack of detail
- Prosecutor not questioning consistently



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RESULT OF WHEELER CHALLENGE

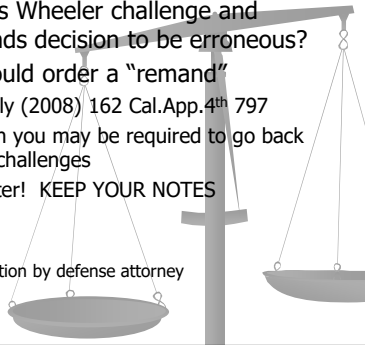
- If challenged party fails to overcome burden, trial court must conclude jury as constituted fails to comply with fair representation requirement
- Jury is dismissed, jury selection begins again...or juror is re-seated (awkward)
- You're in big trouble (See State Bar reporting rules)



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WHAT IF...

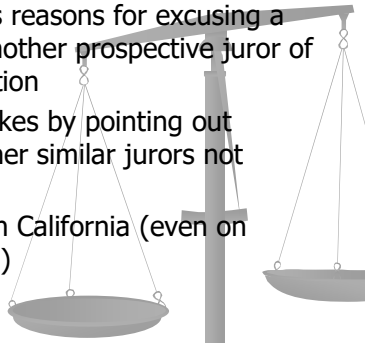
- ...trial court denies Wheeler challenge and appellate court finds decision to be erroneous?
- Appellate court could order a "remand"
 - Example: *P v. Kelly* (2008) 162 Cal.App.4th 797
 - A hearing in which you may be required to go back and explain your challenges
 - Could be years later! KEEP YOUR NOTES
- Remands
 - Not under oath
 - No cross examination by defense attorney



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COMPARATIVE ANALYSIS

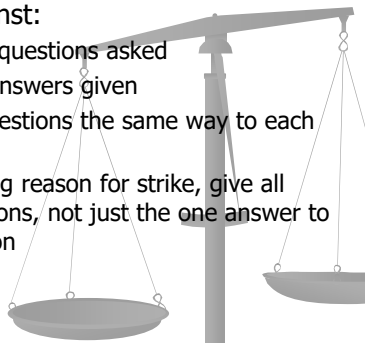
- *Miller-El v. Dretke* (2005) 125 S.Ct. 2317
- Court compares reasons for excusing a juror against another prospective juror of similar constitution
- Challenger invokes by pointing out existence of other similar jurors not excluded
- Alive and well in California (even on appeal, remand)



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COMPARATIVE ANALYSIS

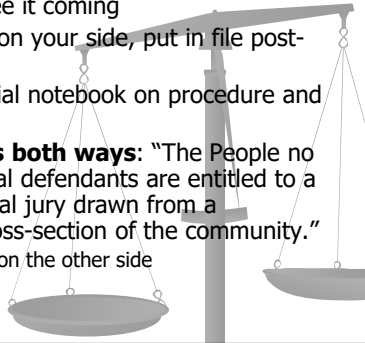
- To protect against:
 - Keep notes on questions asked
 - Keep track of answers given
 - Need to ask questions the same way to each juror
 - When explaining reason for strike, give all applicable reasons, not just the one answer to the one question



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LAST WORD ON WHEELER

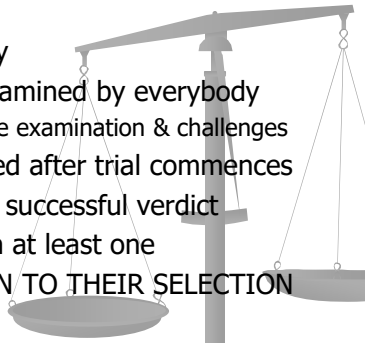
- Don't go there, see it coming
- Keep good notes on your side, put in file post-trial
- Keep section in trial notebook on procedure and case law
- **Wheeler applies both ways:** "The People no less than individual defendants are entitled to a trial by an impartial jury drawn from a representative cross-section of the community."
 - Keep good notes on the other side



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ALTERNATE JURORS

- CCP § 234
- Insurance policy
- Often poorly examined by everybody
 - Subject to same examination & challenges
- Often substituted after trial commences
- Often crucial to successful verdict
- Always insist on at least one
- **PAY ATTENTION TO THEIR SELECTION**



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WINNING & LOSING CASES IN VOIR DIRE

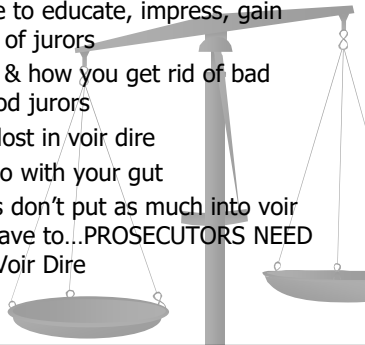
- Battery cases w/minor or no injury
- Low blow DUI
- Case with unsympathetic victim
- Case with recanting victim
- Case with sympathetic defendant
- NHI cases
- No-loss theft cases
- Miami CSI cases (forensic evidence issues)



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LAST WORD

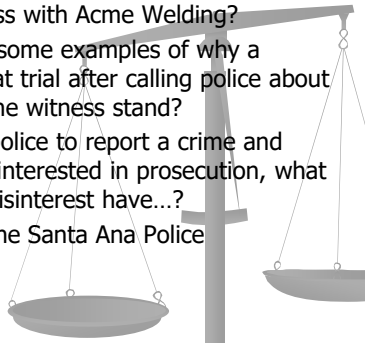
- Voir dire is chance to educate, impress, gain trust or credibility of jurors
- Voir dire is where & how you get rid of bad jurors and get good jurors
- Cases are won & lost in voir dire
- When in doubt...go with your gut
- Defense attorneys don't put as much into voir dire...they don't have to...PROSECUTORS NEED TO PUT ALL into Voir Dire



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SPECIFIC QUESTIONS: People v. Miranda

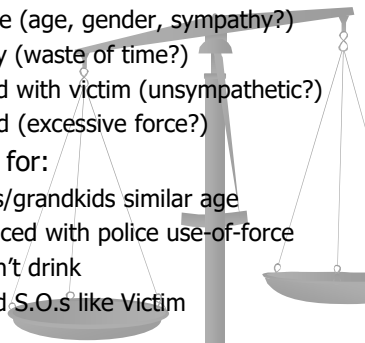
- Ever done business with Acme Welding?
- Can you give me some examples of why a person would lie at trial after calling police about DV? Even from the witness stand?
- If a person calls police to report a crime and later becomes disinterested in prosecution, what role should that disinterest have...?
- Experience with the Santa Ana Police Department?



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FACT PATTERN 1

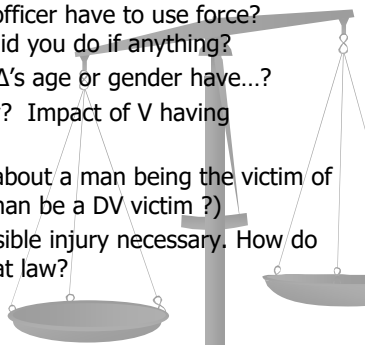
- Issues:
 - Δ young, female (age, gender, sympathy?)
 - No visible injury (waste of time?)
 - Alcohol involved with victim (unsympathetic?)
 - Δ tased/sprayed (excessive force?)
- Jurors to watch for:
 - Jurors with kids/grandkids similar age
 - Jurors experienced with police use-of-force
 - People who don't drink
 - People who had S.O.s like Victim



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FACT PATTERN 1 QUESTIONS

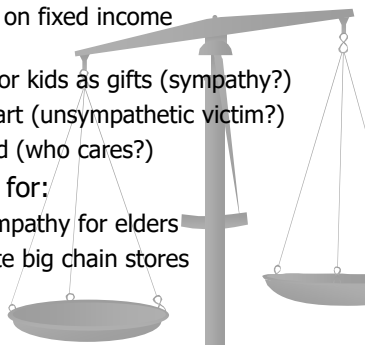
- Ever seen police officer have to use force? Describe. What did you do if anything?
- What impact will Δ's age or gender have...?
- Don't drink? Why? Impact of V having alcohol...?
- How do you feel about a man being the victim of DV? (not: can a man be a DV victim ?)
- 243(e) says no visible injury necessary. How do you feel about that law?



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FACT PATTERN 2

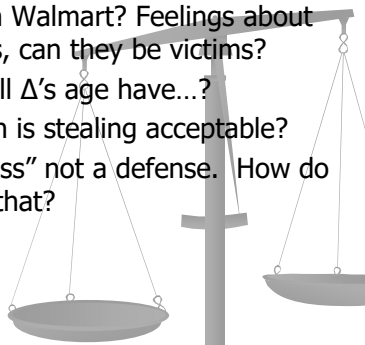
- Issues:
 - Elderly suspect on fixed income (sympathetic?)
 - Δ stole things for kids as gifts (sympathy?)
 - Victim is Walmart (unsympathetic victim?)
 - No loss suffered (who cares?)
- Jurors to watch for:
 - People with sympathy for elders
 - People who hate big chain stores



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FACT PATTERN 2 QUESTIONS

- Experience with Walmart? Feelings about big chain stores, can they be victims?
- What impact will Δ's age have...?
- For what reason is stealing acceptable?
- Law says "no loss" not a defense. How do you feel about that?

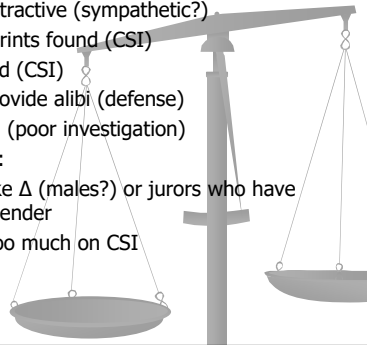


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FACT PATTERN 3

■ Issues:

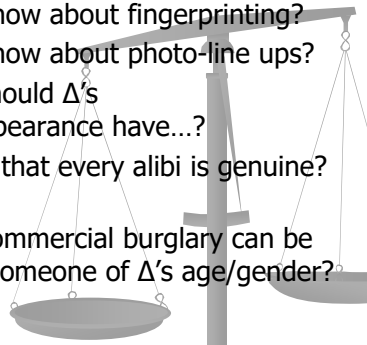
- Δ is young and attractive (sympathetic?)
- No usable fingerprints found (CSI)
- Photo line-up used (CSI)
- Roommate will provide alibi (defense)
- DNA not obtained (poor investigation)
- Jurors to watch for:
 - Jurors who will like Δ (males?) or jurors who have kids similar age/gender
 - Jurors who rely too much on CSI
 - Gullible people



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FACT PATTERN 3 QUESTIONS

- What do you know about fingerprinting?
- What do you know about photo-line ups?
- What impact should Δ's age/gender/appearance have...?
- Do you believe that every alibi is genuine? Why not?
- Do you think commercial burglary can be committed by someone of Δ's age/gender?

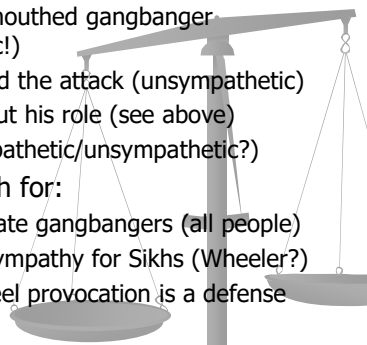


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FACT PATTERN 4

■ Issues:

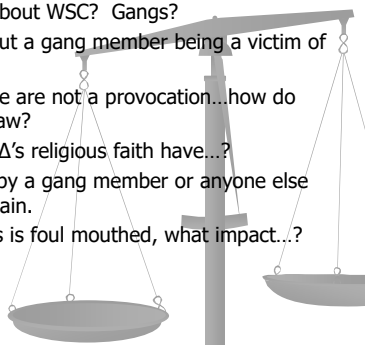
- Victim is foul-mouthed gangbanger (unsympathetic!)
- Victim provoked the attack (unsympathetic)
- Victim lied about his role (see above)
- Δ is Sikh (sympathetic/unsympathetic?)
- Jurors to watch for:
 - People who hate gangbangers (all people)
 - People with sympathy for Sikhs (Wheeler?)
 - People who feel provocation is a defense



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FACT PATTERN 4 QUESTIONS

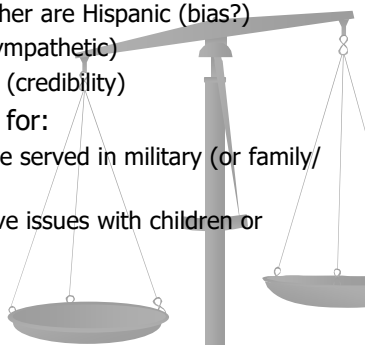
- What do you know about WSC? Gangs?
- How do you feel about a gang member being a victim of a crime?
- Law says words alone are not a provocation...how do you feel about that law?
- What impact should Δ's religious faith have...?
- Ever been harassed by a gang member or anyone else outside a store? Explain.
- If a Victim or witness is foul mouthed, what impact...?



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FACT PATTERN 5

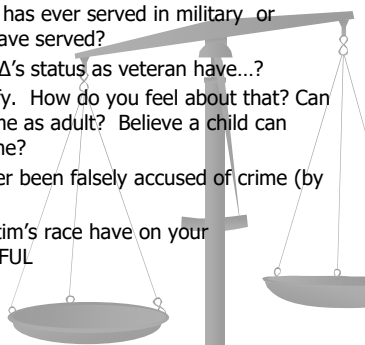
- Issues:
 - Victim and mother are Hispanic (bias?)
 - Δ is veteran (sympathetic)
 - Victim is young (credibility)
- Jurors to watch for:
 - Jurors who have served in military (or family/friends, etc)
 - People who have issues with children or Hispanics



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FACT PATTERN 5 QUESTIONS

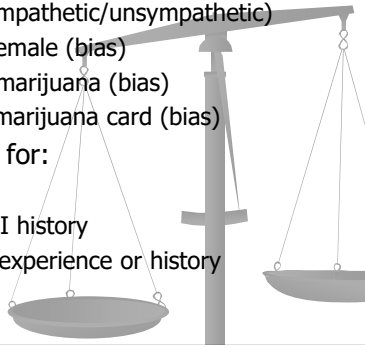
- Δ is a veteran. Who has ever served in military or family/friends who have served?
- What impact should Δ's status as veteran have...?
- 10 year old will testify. How do you feel about that? Can assess credibility same as adult? Believe a child can credibly report a crime?
- Self/family/friend ever been falsely accused of crime (by a child)? Explain.
- What impact will Victim's race have on your deliberations? CAREFUL



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FACT PATTERN 6

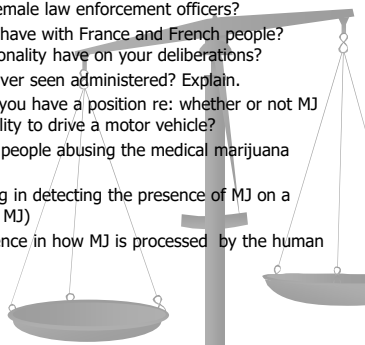
- Issues:
 - Δ is French (sympathetic/unsympathetic)
 - CHP officer is female (bias)
 - DUID involves marijuana (bias)
 - Δ has medical marijuana card (bias)
- Jurors to watch for:
 - Francophiles
 - People with DUI history
 - Jurors with MJ experience or history



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FACT PATTERN 6 QUESTIONS

- How do you feel about female law enforcement officers?
- What experience do you have with France and French people? What impact will his nationality have on your deliberations?
- Experience with FSTs? Ever seen administered? Explain.
- Experience with MJ. Do you have a position re: whether or not MJ can impair a person's ability to drive a motor vehicle?
- Who feels that there are people abusing the medical marijuana laws? Explain.
- Who has received training in detecting the presence of MJ on a person (signs, not actual MJ)
- Who has training/experience in how MJ is processed by the human body?



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