

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

e-Filed in Office
Tammie Mosley
Clerk of Superior Court
Chatham County
Date: 9/23/2024 4:01 PM
Reviewer: BW

STATE OF GEORGIA,

versus

**LEILANI SIMON,
Defendant.**

Case Number: SPCR22-03364-J6

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

COMES NOW, Defendant in the above-styled matter, who by and through the undersigned counsel, and hereby respectfully requests the following questions be asked of the prospective jurors:

1. Does anyone here know Leilani Simon? If so, how do you know Ms. Simon?
2. Does anyone here know Ms. Simon's attorneys, Martin G. Hilliard or Robert Persse?
3. Does anyone here know the Chatham County District Attorney, Shalena Cook Jones?
4. Does anyone here know Chatham County Assistant District Attorney, Jennifer Parker?
5. Does anyone here know Assistant United States Attorney, Timothy Dean?
6. Does anyone here know another potential juror being considered for the jury in this case?
7. Has anyone here previously served as a juror, and if so, were you the foreperson?
8. Does anyone here 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 as a juror?
9. Do any of you have fear or anxiety of contracting any illness through the course of this trial?
10. Do any of you have medical conditions that will affect ability to serve in this court?
11. Has anyone seen ant news coverage regarding Quinton Simon or Leilani Simon?
12. Does anyone here have any knowledge of the facts or circumstances of this case other than what has been presented in court today?

13. Does anyone here believe they cannot stand in judgement of another person?
14. Has anyone here ever been accused of doing something they had not done?
15. As a reminder, in this Country, when someone is accused of violating a law, or committing a crime, that person is presumed to be innocent unless it can be proven beyond a reasonable doubt by the government that the person is guilty. Does anyone here believe that a person must prove their own innocence when they've been accused of committing a crime?
16. Does anyone here believe that when a person is accused of committing a crime, but chooses not to testify at trial, that he or she is likely hiding something?
17. Do any of you believe that criminal defendants have too many rights?
18. Does the nature of the charges in this case (murder) create any sense of bias in any of you against Ms. Simon?
19. Have any of you, a family member, or close friend ever been a victim of a crime?
20. Have any of you, a family member, or close friend had a good or bad experience with law enforcement?
21. Have any of you, a family member, or close friend ever been a witness to a crime in progress?
22. Have any of you had any type of legal training or education, including law school, paralegal training, criminal justice courses in school or even constitutional law classes?
23. Have any of you had any psychological training?
24. Does anyone here have a friend or relative that has been the victim of an attempted murder and survived? If so, was the incident resolved with an arrest or prosecution of the shooter?
25. Does anyone here have a friend or relative that has been the victim of an attempted murder