

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

M. M. FARRAKHAN,

Plaintiff,

**Civil Action No.
03-CV-0928 (NAM)(DRH)**

-vs-

**PROPOSED JURY
VOIR DIRE QUESTIONS**

**J. BURGE, SUPERINTENDENT; M. L. BRADT,
DEPUTY COMMISSIONER OF SECURITY;
C. GUMMERSON, CAPTAIN; M. WITHER, SGT. R.
HEWIT, CORRECTIONS OFFICER,**

Defendants.

Plaintiff, M.M. Farrakhan, in the above-named action, respectfully requests that the Court include the following questions in its voir dire:

Prepared on Behalf of Plaintiff:

1. Are you related to, or closely connected with, a correctional facility official or officer, or person employed in law enforcement?
2. Would the fact that the plaintiff is an inmate make it difficult for you to render a verdict in his favor?
3. Will the fact that the plaintiff is an inmate likely affect your decision in this matter?
4. Have you, or any of your family members, ever been the victim of a crime?
5. Have you, or any of your family members, ever been convicted of a crime?
6. Have you, or any of your family members, ever been incarcerated?
7. Have you, or any of your family members, experienced police brutality or official misconduct?
8. Do you feel that when a person goes to prison they essentially give up their Constitutional and Civil Rights?

9. Do you feel that inmates should be protected from attacks by other inmates by correctional officers or officials?
10. Do you think that there should be policies in effect that serve to protect inmates from attacks by other inmates?

DATED: November 1, 2005

Respectfully submitted,

COSTELLO, COONEY & FEARON, PLLC

By: /s/ Samuel C. Young
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