

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

**UNITED STATES OF AMERICA,**

**v.**

**Case No. 3:18-cr-89-J-34 JRK**

**KATRINA BROWN and  
REGINALD BROWN**

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**MOTION FOR RELEASE OF NAMES OF POTENTIAL JURORS**

The Defendant, Katrina Brown, through her undersigned attorney, Richard Landes, Esq. files this motion for an Order to release the names of potential jurors to be called in the above matter for the purpose of background checks.

When last in Court, the issue of juror questionnaires was raised as a way for the parties to learn more about the prospective jurors views of this high publicity case in order to potentially save time and weed out those jurors that would be deemed ineligible to serve. The Court ruled against the use of juror questionnaires as too unwieldy and cumbersome to execute. However, the release of potential jurors names some weeks in advance of jury selection is easily done and would afford both Defendants and the Government the opportunity to review jurors' backgrounds to help determine their suitability to be seated as jurors in this case.

There have been numerous news articles and television reports about this case and many public comments have been expressed in the media by those who choose to write them. Those

comments are expressed publicly for all to see and are not confidential. The onus of doing background checks would be placed on the parties, not on the jurors themselves or the Court. As such, there is nothing burdensome to coordinate or administer.

While it would (arguably) be possible to run these searches in the courtroom during the voir dire process, the job could not be done thoroughly in the time available, and neither counsel is adept enough to do this task while listening to jurors' answers during the voir dire process. Reginald Brown's counsel, Thomas Bell, joins in this motion. The Government opposes this motion, citing Local Rule 5.01(b), which states that a list of jurors is to "be furnished to counsel only at the time the case is called for trial..."

Defendants are asking for what they would be entitled to – the names of potential jurors - just sooner, rather than the day jury selection is to begin. This is in keeping with Defendant's 6<sup>th</sup> Amendment right to a fair trial and an impartial jury panel to judge them, free of bias. The release of potential juror names to counsel in advance of the first day of jury selection for the sole purpose of background searches would afford both parties a fair trial, especially in a case with extensive media coverage, comments and reactions to this Indictment by the public. The Court could fashion an Order whereby the names be released to the parties only, and for the purpose of conducting background searches (no personal contact). The purpose of this request is not to embarrass potential jurors, but to learn their potential biases (if any), to get a more complete picture of the jurors who would make up the jury panel to insure a fair trial for both Defendants and the Government.

WHEREFORE, Defendant's Katrina Brown and Reginald Brown ask that this motion to release juror names in advance be granted.

Respectfully submitted,

Richard Landes, Esq.

*s/Richard Landes*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing motion was electronically filed with the Clerk of the Court on July 12, 2019 by using the CM/ECF system which will send a notice of electronic filing to the US Attorney's Office for the Middle District of Florida, Jacksonville Division.

*s/Richard Landes*

Richard Landes, Esq.