District Court, Boulder County, Colorado Court Address: 1776 6 th Avenue Boulder, CO 80306	
THE PEOPLE OF THE STATE OF COLORADO	DATE FILED: April 26, 2024 4:00 PM
v.	
AHMAD AL ALIWI ALISSA	
Defendant.	
	σ COURT USE ONLY σ
Megan Ring, Colorado State Public Defender	Case No. 21CR497
Kathryn Herold #40075	
Supervising Deputy State Public Defender	Division 13
Samuel Dunn #46901	
Deputy State Public Defender	
Boulder Regional Public Defenders	
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MR. ALISSA'S MOTION FOR A QUESTIONNAIRE (D-043)	

AHMAD ALISSA, through counsel, requests this Court use its discretion and require prospective jurors to fill out a questionnaire as part of their summons for jury service. In support of this motion, Mr. Alissa states the following:

- 1. Mr. Alissa is set for a month long trial, a week of that trial dedicated to jury selection.
- 2. Mr. Alissa is charged with one-hundred and fifteen counts. Ten of those charges are for first degree murder. Mr. Alissa has pled not guilty by reason of insanity to all of these accusations.
- 3. On March 22, 2021 Mr. Alissa went to a King Soopers in Boulder and shot and killed ten people. He shot at numerous other people, including at multiple police officers. The impact of Mr. Alissa's actions on the Boulder community are indescribable. There will be a number of people who are potentially in the venire that will be automatically disqualified. A jury questionnaire would allow the parties and the Court to dismiss jurors before they even have to appear for service.
- 4. There has been an exceptional amount of pretrial publicity in this case. There is a strong possibility of prejudicial information being disclosed during voir dire without a juror questionnaire. A questionnaire allows jurors to share their pervious exposure to this case without tainting the entire venire.
- 5. Mr. Alissa appreciates that it is not standard practice in this jurisdiction to use a jury questionnaire, regardless of the type of case. However, Colo. R. Crim. P. 24 gives the Court discretion to use questionnaires as part of the voir dire process. That discretion must be used in this case.

- Jurors can be given access to the questionnaire as early as when their juror summons are sent
 out to ensure sufficient time prior to the start of trial to allow these questionnaires to be filled
 out and reviewed.
- 7. If the Court is not going to grant this motion on its face, Mr. Alissa requests a hearing.

WHEREFORE, Mr. Alissa requests this Court grant his motion for a jury questionnaire. Mr. Alissa makes these arguments and motions, and all motions and objections in this case, whether or not expressly stated at the time of the motion or objection, under the Due Process, Trial by Jury, Right to Counsel, Confrontation, Compulsory Process, Equal Protection Cruel and Unusual Punishment and Privilege Against Self Incrimination Clauses of the federal and Colorado Constitutions, and the Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments of the U.S. Constitution, and Art. II, §§ 3,6,7,8,16,18,20,23 and 25 of Colorado's Constitution.

MEGAN A. RING COLORADO STATE PUBLIC DEFENDER

HAMPYL GOLD

Kathryn Herold #40075 Supervising Deputy State Public Defender

Samuel Dunn #46901 Deputy State Public Defender

Dated: April 23, 2024

Certificate of Service

I hereby certify that on ___April 26_____, 2024, I served the foregoing document through Colorado E filing to all opposing counsel of record. ____KH_