

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:26-CR-20128- Becerra

UNITED STATES OF AMERICA

Plaintiff,

v.

WILNER RENAUD,

Defendant.

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

DEFENDANT Wilmer Renaud, through undersigned counsel, respectfully submits the following proposed voir dire questions for the Court's consideration during jury selection in the above-captioned matter. We ask that the Court consider these questions in addition to the general questions that the Court usually asks in criminal cases.

I. GENERALLY, REGARDING VOTING CASES

1. Have you read, seen, or heard anything in the news, on social media, or from any other source about about noncitizen voting cases generally in Miami-Dade County or elsewhere?
2. Have you discussed the general subject matter of noncitizens registering to vote or voting in elections, with anyone, including family, friends, or coworkers?
3. Do you follow local or national news coverage regarding voter fraud, election integrity, or noncitizen voting? If so, how closely, and through what sources?
4. If you have been exposed to any media coverage or commentary on these topics, can you set aside anything you have seen or heard and decide this case based solely on the evidence presented in this courtroom?

5. Is there anything about the publicity surrounding immigration and elections generally that would make it difficult for you to keep an open mind in this case?

II. IMMIGRATION-RELATED BIAS

6. What are your general views on immigration and on noncitizens living in the United States?
7. Do you or does anyone close to you hold strong personal, political, or religious views about U.S. immigration policy or noncitizen individuals living in this country?
8. Mr. Renaud is a noncitizen. Does the fact that he is not a United States citizen affect, in any way, your ability to view him fairly and to presume him innocent?
9. Have you, a family member, or a close friend ever had a negative personal experience involving an immigrant or noncitizen that might affect your ability to be fair in this case?

III. VOTING AND ELECTION INTEGRITY

10. Do you have strong personal feelings about voter fraud or election integrity in the United States?
11. Have you ever been a member of, volunteered for, donated to, or worked with any organization, campaign, or advocacy group focused on election integrity, voter fraud, or voting rights, on any side of the issue?
12. Have you ever worked as a poll worker, election official, or in any capacity for a Supervisor of Elections office or similar agency?
13. Do you believe that media coverage of alleged voter fraud or noncitizen voting has affected your views about how such cases should be handled by the criminal justice system?
14. Do you believe that every instance of a person voting or registering to vote while ineligible should automatically result in criminal prosecution and conviction, regardless of the circumstances?

15. Would you be able to consider evidence that a violation of voting or registration laws was inadvertent, mistaken, or the product of confusion, rather than assuming it must have been intentional?

IV. LAW ENFORCEMENT BIAS

16. Do you believe that law enforcement officers or federal agents always follow proper procedures when questioning a person, or do you understand that officers and agents can make mistakes or fail to follow required procedures?
17. If the evidence in this case raises questions about how law enforcement agents conducted an interview or investigation, would you be able to fairly evaluate that evidence just as you would evaluate any other evidence in the case?

V. THE KNOWLEDGE/INTENT ELEMENT

18. Have you ever filled out a government form, application, or official document and later realized you made a mistake, misunderstood a question, or checked the wrong box?
19. Do you believe that everyone who signs a government form is automatically presumed to have read, understood, and knowingly agreed with every statement on it, or can you accept that people sometimes sign documents without fully understanding every detail?

VI. ABILITY TO BE FAIR AND IMPARTIAL

20. Is there anything about the nature of the charges in this case, the parties involved, or the subject matter that I have not specifically asked about that might affect your ability to be fair and impartial to both sides?

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on July 15, 2026 via transmission of Notices of Electronic Filing generated by CM/ECF to all parties registered to receive notice in this case.

/s/ Daniel Lawrence Rashbaum
Daniel Lawrence Rashbaum