

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 10CR-116 BDB
)	
HAROLD R. WELLS,)	
NICK DEBRUIN, and)	
EARNEST BRUCE BONHAM)	

UNITED STATES' MOTION TO CONTACT JURORS

The United States of America, by and through its attorneys, Jane W. Duke, Patrick C. Harris, and Patricia S. Harris, Special Assistant United States Attorneys, pursuant to Northern District of Oklahoma Local Criminal Rule 1.2 and Local Civil Rule 47.2, hereby seeks leave of the Court to engage in contact with the jurors and alternate jurors in the above-referenced matter.

As grounds, the United States submits:

1. A jury trial concluded in this matter on June 10, 2011. The case was heard by a jury of 12 persons, with 2 alternate jurors.

2. Pursuant to Local Criminal Rule 1.2, the Local Civil Rules for the Northern District of Oklahoma are made applicable to criminal matters in certain delineated areas, which include communication with jurors.

3. Local Civil Rule 47.2 directs that “[a]t no time, including after a case has been completed, may attorneys approach or speak to jurors regarding the case unless authorized by the Court, upon written motion.”

4. The United States requests permission to contact the jurors and alternate jurors who served in this case. If agreeable to the Court, the jurors and alternate jurors could be contacted by letter from the United States District Court Jury Coordinator to determine their

willingness to be contacted by the United States and/or any of the counsel for the defendants in this matter.

5. Provided that the jurors and alternate jurors are so willing, the United States further requests that the Court permit juror and alternate juror contact on such terms as the Court deems appropriate.

6. Counsel for the City of Tulsa, and more particularly the Internal Affairs Division of the Tulsa Police Department, has requested that it be allowed to participate in any juror interviews in this case. The United States submits that allowing the City Attorney to directly participate will eliminate the need for undersigned counsel to relay any pertinent information to the City Attorney.

WHEREFORE, the United States respectfully requests that the Court direct that the jurors and alternate jurors who served in this case be contacted by letter from the Northern District of Oklahoma Clerk of the Court to determine their willingness to be contacted by the United States, defense counsel in this matter, and counsel for the City of Tulsa and allow such contact of those jurors and alternate jurors who indicate their willingness to same.

Respectfully submitted,

/s/ Jane W. Duke

JANE W. DUKE (Ark. Bar #96190)
PATRICK C. HARRIS (Ark. Bar #85069)
PATRICIA S. HARRIS (Ark. Bar #89208)
Special Assistant United States Attorneys
P.O. Box 1229
Little Rock, Arkansas 72203
(501) 340-2600

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of June, 2011, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Warren Gotcher
Shannon McMurray
William Lunn

/s/ Patricia S. Harris _____

Patricia S. Harris

Special Assistant U.S. Attorney