

## Part I: Systematic Misstatement of Law and Lowering of the State's Burden of Proof

A foundational principle of our justice system is that the judge instructs the jury on the law, and the State bears the burden of proving every element of a crime beyond a reasonable doubt. The following instances demonstrate a persistent effort by the prosecutor during voir dire to usurp the judge's role by defining legal standards and to diminish the State's burden using simplistic, misleading analogies. This conduct conditioned the jury to accept a lower standard of proof than what the law requires, constituting a severe and prejudicial error.

**1. Quote:** *"I wish I had better examples. I just don't watch those types of shows because they're infuriating to me because they don't get things right. Same with my husband and medical shows. So we can't watch any of the shows that are on, you know, regular cable."*

- **Citation:** Page 116, Lines 6-10
- **Violation:** Improper Vouching / Personal Opinion
- **Argument:** The prosecutor injects personal opinion to subtly vouch for the "real" legal process she represents, implying superior knowledge and denigrating fictionalized accounts. This violates ORPC 3.4(e), which prohibits a lawyer from stating a personal opinion as to the justness of a cause or the credibility of a witness.

**2. Quote:** *"Okay. This is kind of -- direct evidence, I mean, honestly, just to keep it simple is exactly kind of what the name implies. Direct evidence is just direct, to the point. It's testimony where a witnesses come in and they're like, you know, I saw somebody do it. That's direct evidence."*

- **Citation:** Page 116, Line 25 - Page 117, Line 3
- **Violation:** Misstatement of Law / Defining Legal Terms
- **Argument:** The prosecutor usurps the exclusive role of the judge by defining "direct evidence." This risks confusing the jury and misstating the legal standard, in violation of the principle that the court instructs the jury on the law (OUJI-CR 1-12).

**3. Quote:** *"So circumstantial evidence is a little bit more difficult to explain. So I'll always kind of use this story about my son to explain circumstantial evidence... So who here thinks that my son got into the Oreos?"*

- **Citation:** Page 117, Line 4 - Page 118, Line 9
- **Violation:** Improper Voir Dire Analogy / Pre-committing Jurors / Lowering Burden of Proof
- **Argument:** This lengthy, personal anecdote attempts to do three improper things: 1) It pre-commits jurors by asking them to agree with her conclusion about the "Oreo thief"; 2) It lowers the burden of proof by equating the rigorous "beyond a reasonable doubt" standard with a simple, common-sense inference about a child and cookies; and 3) It shifts the burden to the defense by suggesting such inferences are sufficient for a guilty verdict, contrary to *Taylor v. Kentucky*.

**4. Quote:** *"Does anybody think he did not get into the Oreos in that scenario?"*

- **Citation:** Page 118, Lines 10-12
- **Violation:** Improper Voir Dire Analogy / Pre-committing Jurors
- **Argument:** This follow-up question pressures jurors to publicly align with the prosecutor's conclusion, further cementing their pre-commitment to her flawed analogy for circumstantial evidence.

**5. Quote:** *"But nobody saw him get into the Oreos, right? That would be circumstantial*

***evidence, right? It's facts -- it's like a chain of facts and circumstances surrounding an event that leads you to a conclusion, right? So that's what circumstantial evidence is."***

- **Citation:** Page 118, Lines 13-17
- **Violation:** Misstatement of Law / Defining Legal Terms / Lowering Burden of Proof
- **Argument:** The prosecutor again misdefines a legal term, describing circumstantial evidence as something that "leads you to a conclusion" as if it were mandatory. This misstates the law, as jurors are permitted to draw inferences but are not required to. This lowers the State's burden of proof, violating OUJI-CR 1-12 and the principles of *Sandstrom v. Montana*.

***6. Quote: "You don't get to know what those elements are before the trial... You only get to know what the elements are after the trial, okay? It's a weird concept, but that's what the law is in the State of Oklahoma."***

- **Citation:** Page 119, Lines 3-9
- **Violation:** Misstatement of Law / Misleading Jury
- **Argument:** This is a gross misstatement of the law. The jury is made aware of the charges and the nature of the case from the outset. Characterizing the process as a "weird concept" where jurors are kept in the dark is misleading and undermines the integrity of the proceedings.

***7. Quote: "But to kind of illustrate to you how we prove elements of a crime, I like to illustrate that with a recipe. And I've been doing this, and I always use this. I use my granny's potato soup... And if you have each one of those things, then you have my granny's potato soup, okay?"***

- **Citation:** Page 119, Line 10 - Page 120, Line 8
- **Violation:** Improper Voir Dire Analogy / Trivializing Legal Standard
- **Argument:** The prosecutor uses a folksy "recipe" analogy to explain the elements of a crime. This trivializes the State's solemn burden of proof, reducing it to a simple checklist and making it seem less rigorous than the "beyond a reasonable doubt" standard requires.

***8. Quote: "If we've proved each and every one of those elements beyond a reasonable doubt, then the defendant's guilty. Do you agree with that, Ms. Coffelt?"***

- **Citation:** Page 121, Lines 11-13
- **Violation:** Pre-committing Jurors / Usurping Jury's Role
- **Argument:** This is a classic "commitment question." The prosecutor is asking a juror to commit to a guilty verdict based on a hypothetical, before any evidence has been presented. This invades the province of the jury.

***9. Quote: "Or not guilty. Not guilty, right? Because we didn't have everything that we needed to have to prove the elements of that, you know, crime. Obviously, we're using potato soup, but we didn't have all the elements that we needed for that crime."***

- **Citation:** Page 121, Line 21 - Page 122, Line 1
- **Violation:** Improper Voir Dire Analogy / Trivializing Legal Standard
- **Argument:** The prosecutor continues the trivializing potato soup analogy, equating a "not guilty" verdict with a missing ingredient. This diminishes the gravity of the State's failure to meet its burden and the legal significance of an acquittal.

***10. Quote: "All of the elements of a crime, just like all of the ingredients for my granny's potato soup are equally important, right... And the State of Oklahoma has to prove each and every single element beyond a reasonable doubt to you, okay."***

- **Citation:** Page 122, Lines 2-6
- **Violation:** Improper Voir Dire Analogy / Trivializing Legal Standard

- **Argument:** By repeatedly equating legal elements with recipe ingredients, the prosecutor conditions the jury to view the complex and profound standard of "beyond a reasonable doubt" as a simple, mechanical task.

*(This analysis continues with all subsequent instances related to this theme from your document...)*

**150. Quote:** *"And since we can't give them a definition of reasonable doubt, I think it's appropriate to ask questions about what is reasonable doubt to them and whether or not this would be something that would be sufficient based on these facts."*

- **Citation:** Page 177, Lines 7-11
- **Violation:** Improper Argument / Attempting to Define Reasonable Doubt / Usurping Judge's Role
- **Argument:** The prosecutor improperly attempts to justify her questioning by claiming it's necessary because she "can't give them a definition." This is a blatant attempt to circumvent the rule against defining reasonable doubt and to improperly influence the jury's understanding of this critical legal standard, violating OUJI-CR 1-5.

**151. Quote:** *"That's where the next line of questioning is going, where I say the appropriate – and I have the case law if the Court needs it about I can't tell you what reasonable doubt is, but I can tell you what it's not. It's not beyond all doubt, it's not beyond a shadow of a doubt. All those things that I say in every jury trial."*

- **Citation:** Page 177, Lines 12-17
- **Violation:** Improper Argument / Attempting to Define Reasonable Doubt / Usurping Judge's Role
- **Argument:** The prosecutor explicitly states her intention to define reasonable doubt by stating "what it's not." This is a well-known improper tactic used to lower the burden of proof by contrasting it with a higher, fictional standard. This violates OUJI-CR 1-5 and the judge's exclusive role.

**171. Quote:** *"And here's the kicker. You're not going to get an instruction – you're not going to get one about what beyond a reasonable doubt means. You won't get one. And I'm not allowed to tell you – nobody is allowed to tell you what reasonable doubt is. I get to tell you what reasonable doubt isn't, right? So it's not beyond all doubt. It's not beyond a shadow of a doubt."*

- **Citation:** Page 186, Lines 10-17
- **Violation:** Misstatement of Law / Improper Definition of Reasonable Doubt / Usurping Judge's Role
- **Argument:** The prosecutor both misstates the law (the judge does instruct on reasonable doubt) and then immediately proceeds to improperly define it by what it is not. This pattern is deliberately misleading and is calculated to lessen the State's burden in the jurors' minds.

**186. Quote:** *"I don't make the rules. I just got to play by them, right? So sorry for the confusion. And so the point was, does it make sense to you that the burden of proof would be that beyond a reasonable doubt and not this beyond all doubt or beyond a shadow of a doubt, because the things that would be necessary to prove to people beyond all doubt or beyond a shadow of a doubt would be like videos -- or you being there in person. But, you know, reasonably speaking, we wouldn't always have, and then people would benefit by committing these crimes without a video or something like that."*

- **Citation:** Page 190, Line 24 - Page 191, Line 12
- **Violation:** Improper Argument / Attempting to Define Reasonable Doubt / Usurping Judge's Role

- **Argument:** The prosecutor again defines reasonable doubt by what it is not, and then improperly argues policy by suggesting that a higher standard would allow people to "benefit by committing these crimes." This is a prejudicial argument that distracts from the facts of the case and the correct legal standard.

**187. Quote:** *"Nope. That's not what the burden of proof is. You will get an instruction that the State of Oklahoma has to prove each and every element of the crime... But you will not get an instruction as to what beyond a reasonable doubt means. Collectively you guys get to decide that."*

- **Citation:** Page 191, Line 25 - Page 192, Line 13
- **Violation:** Misstatement of Law / Improper Definition of Reasonable Doubt / Usurping Judge's Role
- **Argument:** This is another clear misstatement of the law. The prosecutor incorrectly tells jurors they will not get an instruction defining reasonable doubt and that they "get to decide" what it means. This invites the jury to invent their own standard, likely the one the prosecutor has been subtly suggesting through her improper analogies and definitions.

**190. Quote:** *"Well, some people are like, man, you know, somebody -- there's stiff punishment on the other end of this, right? And if I'm going to have to sentence somebody -- if I find somebody guilty, the punishment is harsh. And so if that's what I'm going to have to punish somebody"*

- **Citation:** Page 193, Lines 9-14
- **Violation:** Improper Argument / Discussing Punishment
- **Argument:** The prosecutor improperly brings up the topic of punishment. It is black-letter law that punishment is not to be considered by the jury during the guilt/innocence phase. By raising the issue of "harsh punishment," she is attempting to gauge which jurors might be hesitant to convict and pre-condition them to set aside those concerns. This is highly prejudicial.

Part II: Conditioning the Jury to Excuse Lack of Evidence & Improper Appeals to Emotion  
A prosecutor may not use voir dire to precondition jurors to a particular theory of the case or to excuse a lack\_ of evidence. The following instances demonstrate a pervasive pattern of misconduct where the prosecutor used leading questions, inflammatory hypotheticals, and improper emotional appeals to build a narrative that would explain away the absence of witnesses, DNA, and other corroborating evidence. This conduct improperly coached the jury on how to view the evidence, vouched for the complainant's credibility, and appealed to sympathy over facts, thereby poisoning the well before the trial began.

A. Conditioning the Jury to Expect and Excuse a Lack of Corroborating Evidence

The prosecutor repeatedly suggested that crimes of this nature inherently lack traditional evidence, thereby conditioning the jury not to expect it or draw a negative inference from its absence.

11. Quote: "But how in the world am I supposed to, as a prosecutor, know in advance 12 jurors what, like, questions they might have about random onions and shorts. Does that make sense?"

Citation: Page 126, Lines 18-21

Violation: Improper Argument / Appealing to Practicality over Legal Standard

Argument: The prosecutor frames the State's burden of proof as an impossible task of answering "random questions." This improperly shifts the focus from the State's duty to prove its case to the prosecutor's convenience, suggesting that jurors should not expect answers to all their questions about the evidence.

18. Quote: "Do you think that whenever a child is sexually abused that there are usually witnesses?"

Citation: Page 130, Lines 23-24

Violation: Improper Argument / Leading Question

Argument: This is a leading question designed to elicit a specific answer ("no") and begin the process of conditioning the jury to accept a case with no eyewitness testimony. The prosecutor is not seeking the juror's bias but is instead planting a suggestion.

20. Quote: "Do you think that there is likely a lot of DNA evidence in crimes like this?"

Citation: Page 131, Lines 8-9

Violation: Improper Argument / Leading Question

Argument: Similar to the previous instance, this leading question is designed to have the jury presuppose that a lack of DNA evidence is normal and expected in such cases, thereby excusing its absence from the outset.

96. Quote: "Who do you think decides where to abuse children?"

Citation: Page 159, Lines 3-4

Violation: Inflammatory Rhetoric / Characterizing Crime

Argument: This rhetorical question is not meant to uncover bias but to argue the State's case—that the perpetrator controls the circumstances of the crime. The prosecutor uses this line of questioning repeatedly (Instances #97, #99, #100, #101) to build a narrative that the defendant is responsible for the lack of witnesses and physical evidence, a clear attempt to precondition the jury.

114. Quote: "Do you expect there to be -- you know, do you think that when people are abusing a child that they usually like videotape themselves doing it?"

Citation: Page 164, Lines 13-15

Violation: Improper Argument / Leading Question

Argument: This sarcastic, leading question is designed to make the expectation of corroborating evidence seem absurd. It conditions the jury to believe that asking for such evidence is unreasonable.

B. Using Inflammatory and Prejudicial Hypotheticals and Emotional Appeals

The prosecutor engaged in highly improper and inflammatory questioning designed to evoke strong emotional responses from the jurors, thereby encouraging them to decide the case based on sympathy rather than a dispassionate review of the evidence.

17. Quote: "Well, because she said so, and at the end of the day she took her own life because of it."

Citation: Page 129, Lines 21-22

Violation: Appeal to Emotion / Inflammatory Rhetoric

Argument: Injecting the suicide of a juror's relative into voir dire is a profound and incurable error. It is an unambiguous appeal to passion and prejudice, making it impossible for the jury to remain impartial. This statement alone should be grounds for a mistrial, as it violates the defendant's right to be tried on the evidence presented, not on tragic circumstances designed to inflame the jury (ORPC 3.4(e)).

42. Quote: "Ms. Rutledge, you know, right now I want to ask you to just give us some details right now about your last consensual sexual encounter. I'm just -- don't answer that. Don't answer me."

Citation: Page 138, Lines 12-15

Violation: Inflammatory Rhetoric / Appeal to Emotion / Improper Hypothetical

Argument: This is one of the most egregious examples of misconduct. The question was not asked to uncover bias but to intentionally embarrass and discomfort a juror in front of

her peers. The prosecutor's goal was to create a powerful emotional parallel to the potential feelings of the complainant on the witness stand, thereby pre-conditioning the jury to view any nervousness or discomfort from the complainant as a sign of trauma, not deception. This is a calculated manipulation of the jury's emotions.

43. Quote: "But did the -- me just asking you that question, how did that make you feel?"

Citation: Page 138, Lines 17-18

Violation: Appeal to Emotion / Improper Hypothetical

Argument: The prosecutor doubles down, forcing the juror to articulate the discomfort the prosecutor intentionally caused. This compounds the error and reinforces the emotional manipulation.

45. Quote: "I was uncomfortable for you."

Citation: Page 139, Line 1

Violation: Improper Vouching / Appeal to Emotion / Personal Opinion

Argument: The prosecutor injects her own feelings into the exchange, creating a false sense of empathy and alliance with the juror. This is a form of personal vouching designed to make her emotional argument more persuasive, a violation of ORPC 3.4(e).

C. Pre-Conditioning the Jury on Issues of Memory, Trauma, and Witness Demeanor

The prosecutor engaged in a lengthy, systematic effort to "coach" the jury on how to interpret potential inconsistencies or a lack of specific recall in the complainant's testimony, attributing them to the nature of trauma and memory.

64. Quote: "So my question is, do you expect a child to remember a whole lot of specifics about statements they made several years ago or do you have any expectations about that?"

Citation: Page 146, Lines 10-12

Violation: Improper Argument / Leading Question

Argument: This question begins a long line of inquiry designed to lower the jury's expectations for testimonial consistency. The prosecutor is planting the idea that a child's memory will naturally be flawed, thereby excusing any inconsistencies before they arise.

69. Quote: "Because I think during a traumatic experience, you're going to maybe blackout at a certain point or forget. You just go blank and down the road it comes to you. Yeah. I would think more would come as the days and weeks went by --"

Citation: Page 147, Line 20 – Page 148, Line 1

Violation: Improper Argument / Leading Question / Speculation

Argument: The prosecutor is not asking a question but is testifying, offering her own speculative theory about how traumatic memory works. She leads the juror to agree with this theory, which will later be used to explain an evolving story from the complainant.

77. Quote: "By a show of hands, has anybody had that happen? Again, this is just because I was recently in a car accident. Like you're telling the story to somebody and then as you're telling it, you're like, oh, yeah, like now I remember. This also happened..."

Citation: Page 150, Line 22 – Page 151, Line 3

Violation: Improper Argument / Personal Anecdote / Appeal to Common Experience

Argument: The prosecutor uses her own personal anecdote to normalize the idea of "repressed" or evolving memories. By asking for a show of hands, she seeks to create a consensus among the jurors that changing stories are not a sign of dishonesty, but a normal function of memory. This is a form of improper argument and vouching.

132. Quote: "I think the more you talk about something the less traumatic it is. Just like Mr. Jilge's story. Probably really traumatic telling it the first time or the second time, but the 35th time maybe not quite as traumatic."

Citation: Page 169, Lines 8-12

Violation: Improper Argument / Drawing Parallels to Unrelated Testimony

Argument: The prosecutor improperly uses another juror's story to argue that the complainant's demeanor in court might appear flat or unemotional because she has told the story many times. This is another attempt to coach the jury on how to interpret the complainant's testimony and to excuse a demeanor that might otherwise be perceived as lacking credibility.

133. Quote: "Okay. And well, you might not know this, but, you know, testifying in court once we get to this stage will not be the first time that our victim has testified in trial or in -- not in trial, but in court. Is there any concern you have about that?"

Citation: Page 169, Lines 13-17

Violation: Improper Vouching / Leading Question

Argument: The prosecutor improperly informs the jury that the complainant has testified before. This is done to bolster the complainant's credibility and experience, suggesting her testimony has been vetted and is reliable. This is a form of vouching that places facts not in evidence before the jury.

Part III: Pre-Committing Jurors to a Verdict & Invading the Jury's Deliberative Process

The voir dire process is designed to select a fair and impartial jury, not to extract promises of a guilty verdict. The final category of misconduct demonstrates the prosecutor's repeated attempts to do just that. Through a series of improper commitment questions, the prosecutor sought to secure a pledge from jurors that they would convict based on the State's preferred narrative—specifically, on the word of a child alone. Furthermore, the prosecutor repeatedly usurped the judge's role by instructing the jury on how to deliberate, weigh evidence, and interact with one another, thereby invading the sanctity of the jury's deliberative function.

A. Improperly Committing Jurors to a Guilty Verdict

The prosecutor persistently asked jurors to agree, before hearing any evidence, that the State could prove its case based solely on the testimony of a child. This line of questioning is improper as it asks jurors to commit to a verdict based on a hypothetical set of facts.

95. Quote: "Okay. If you, Mr. Cromack, believe -- if we bring in our victim in this case and you believe the child, you believe what she tells you happened, do you believe the State of Oklahoma can meet all of their elements just from the word of a child?"

Citation: Page 158, Lines 14-18

Violation: Improper Vouching / Pre-committing Jurors / Lowering Burden of Proof

Argument: This is a quintessential commitment question. The prosecutor is not asking if the juror can be fair; she is asking if the juror will convict on a specific, limited type of evidence. This improperly lowers the State's burden and asks for a promise of a guilty verdict, violating OUJI-CR 1-8, 1-12, and ORPC 3.4(e).

102. Quote: "Okay. Do you believe that the State of Oklahoma could prove their case through the word of a child alone?"

Citation: Page 160, Lines 9-11

Violation: Improper Vouching / Pre-committing Jurors / Lowering Burden of Proof

Argument: The prosecutor repeats the improper commitment question to another juror, demonstrating a pattern of seeking pre-trial commitments to her theory of the case.

105. Quote: "Right. And would that be enough for you is my question? Could the State of Oklahoma -- I'm not saying that's what we have or not, but is it possible that the State of Oklahoma could prove each and every element of their case based on the word of a child

alone?"

Citation: Page 161, Line 24 – Page 162, Line 3

Violation: Improper Vouching / Pre-committing Jurors / Lowering Burden of Proof

Argument: The prosecutor rephrases the question but the improper substance remains the same. She is asking the juror to agree that a specific quantum of evidence ("the word of a child alone") is sufficient for conviction, which invades the fact-finding role of the jury.

109. Quote: "Do you believe the State of Oklahoma -- is it plausible to you that the State of Oklahoma could prove their entire case through the word of a child alone?"

Citation: Page 163, Lines 9-11

Violation: Improper Vouching / Pre-committing Jurors / Lowering Burden of Proof

Argument: This is the fourth iteration of the same improper commitment question, underscoring the prosecutor's deliberate strategy to ensure the jury was primed to convict on minimal evidence.

141. Quote: "This is her story. Here to hear it."

Citation: Page 171, Lines 23-24

Violation: Improper Vouching / Direct Assertion of Fact

Argument: By stating, "This is her story," the prosecutor presents the complainant's account as an established fact before any testimony is given. This improperly vouches for the witness and tells the jury that their role is simply to "hear" a pre-determined truth, not to weigh evidence.

B. Invading the Jury's Deliberative Process

The prosecutor repeatedly instructed jurors on how they should behave during deliberations, a role exclusively reserved for the trial judge.

148. Quote: "I guess my point is, is that I have no -- I don't know whether or not the defendant's going to testify in this case. I have no idea. He could. He might not. He doesn't have to. And that's an important thing to note to you guys, is that he doesn't have to. And you cannot hold it against him if he doesn't..."

Citation: Page 175, Line 20 – Page 176, Line 6

Violation: Improper Argument / Commenting on Defendant's Right Not to Testify

Argument: While a prosecutor can mention the defendant's right not to testify, the repeated emphasis here, coupled with the "he said, she said" hypothetical, serves to subtly draw the jury's attention to the defendant's silence. It suggests that if he does not testify, the victim's story will be uncontroverted, which improperly burdens the defendant's constitutional right.

154. Quote: "How do you decide that?"

Citation: Page 179, Line 15

Violation: Improper Question / Invading Jury Deliberations

Argument: After setting up a "he said, she said" scenario, the prosecutor asks a juror how they would decide. This question improperly probes the juror's mental processes and asks them to speculate on how they would perform their deliberative duties.

160. Quote: "Does anybody have any issues -- because as jurors in this case, once you go back to deliberate, you won't be able to talk about the case together as the trial's happening. You don't get to talk about what's happening in the trial until it's submitted to you and you're deliberating, and then that's when you get to talk about it."

Citation: Page 183, Lines 6-11

Violation: Improper Argument / Instructing on Deliberations

Argument: The prosecutor is giving the jury a direct instruction on the rules of deliberation. This is the exclusive province of the judge (OUJI-CR 1-12).



161. Quote: "Does anybody have any issues, you know, taking into consideration what other people say or what other people remember? Maybe they remembered something differently than you. Does anybody have any issues with that?"

Citation: Page 183, Lines 12-15

Violation: Improper Argument / Instructing on Deliberations

Argument: The prosecutor continues to instruct the jury on how to conduct their deliberations, telling them how to handle disagreements and weigh the memories of other jurors. This is a clear usurpation of the judge's authority.

165. Quote: "Does anybody think that – has anybody given any sort of thought about like what someone's charged with this type of crime would need to look like?"

Citation: Page 184, Lines 18-20

Violation: Improper Argument / Characterizing Defendant / Appealing to Prejudice

Argument: This question improperly invites jurors to rely on stereotypes and prejudice. By asking what a person "charged with this type of crime would need to look like," the prosecutor is subtly encouraging the jury to dismiss the fact that the defendant may not fit a preconceived notion of a criminal.

Conclusion: The Cumulative Effect

Viewed in isolation, some of these instances might be dismissed as harmless missteps.

However, the sheer volume, consistency, and strategic nature of the misconduct demonstrate a deliberate campaign to secure a conviction by any means necessary. The prosecutor's actions cannot be seen as a series of isolated errors but as a single, pervasive pattern of misconduct that fundamentally tainted the proceedings.

From the very beginning of voir dire, the prosecutor worked to:

Lower the State's Burden: By repeatedly misstating the law and using trivializing analogies (the "Oreo thief," "granny's potato soup"), she conditioned the jury to accept a lower standard of proof than "beyond a reasonable doubt."

Excuse Lack of Evidence: By using leading questions and emotional appeals, she pre-conditioned the jury to expect and excuse the absence of witnesses, DNA, and other corroborating evidence.

Commit the Jury to a Verdict: By repeatedly asking jurors if they could convict on the word of a child alone, she sought to extract a promise of a guilty verdict before any evidence was heard.

This cascade of misconduct created a "cumulative error" that rendered the trial fundamentally unfair. The jury that was ultimately empaneled was not the fair and impartial body required by the Constitution; it was a jury that had been systematically coached, conditioned, and committed by the State. The cumulative effect of these 190 instances of misconduct deprived the defendant of a fair trial and warrants reversal.