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## What's New in 2025–2026?

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**Chapter 7, Change of Venue.** Though a time-honored technique for protecting fair trial rights, successful change of venue can be elusive. This update highlights two successful intradistrict changes of venue—United States v. Mosby (Baltimore City Attorney charged with perjury and making false statements, transfer granted in 2023) and United States v. Fallis (Dakota Access Pipeline Activist accused of weapons charges, transfer granted in 2017). Also look for a 2025 article reporting better-than-expected success rates in state court change of venue motions, based on analysis of appellate court decision.

**Chapter 2, Improving Voir Dire Procedures.** Look for discussion of a research study published in 2025 evaluating the effectiveness of judges' instructions about the potential effects of implicit racial bias. The researchers found that videotaped judicial discussion of this issue had little effect on jurors' opinions and decision-making while oral instructions proved more effective. Also, a 2025 Virginia Court of Appeals finding of reversible error where a trial judge's leading question asking a juror to "agree to follow" the court's instruction where the juror had indicated multiple areas of bias.