

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-60170-CR-SCOLA

UNITED STATES OF AMERICA

v.

**ALEXANDRA ACOSTA and
VILSAINT ST LOUIS,**

Defendants.

/

UNITED STATES' PROPOSED VOIR DIRE QUESTIONS

The United States of America requests that the Court include the following questions to the jury during Voir Dire:

GENERAL

1. Has anyone successfully or unsuccessfully applied for a Paycheck Protection Program loan?

2. Do any of you have any beliefs or convictions, whether moral, religious, philosophical, or otherwise, that would prevent you from being a fair and impartial juror in this case or that would make it difficult for you to reach a verdict based on the evidence and the law as it applies to the evidence?

POSITIVE OR NEGATIVE VIEWS ON LAW ENFORCEMENT

3. Have you, your spouse, or any of your close relatives or friends, ever had any positive or negative dealings or involvement with the IRS, Broward County Sheriff's Office, the Federal Reserve Office of Inspector General, the Department of Justice, or any other federal, state, or local law enforcement agency that would affect your ability to be a fair and impartial juror to both sides in this case?

4. Police officers, federal law enforcement agencies, and the criminal justice system are often the topic of current events and news stories, and these events can shape the way that individuals view the criminal justice system in both positive and negative ways. Does anyone feel that any current events, or any other knowledge or personal views that you have about police officers, federal law enforcement agencies, or the criminal justice system, will lead you to favor or disfavor either the United States or the Defendant in sitting as a juror in this case?

BSO DEPUTIES' PAYCHECK PROTECTION PROGRAM FRAUD NEWS

5. The Defendant is a Broward County Sheriff's Office ("BSO) Deputy Sheriff charged with crimes related to defrauding the Paycheck Protection Program. Has anyone seen or read anything in the news media about BSO deputies being charged with PPP fraud? If yes, have you formed any prior judgments or opinions specific to this Defendant that would prevent you from being a fair and impartial juror in this case or that would make it difficult for you to reach a verdict based on the evidence and the law as it applies to the evidence?

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

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