UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	**CASE NO: CR 422-84**
	)	
BERNARD OKOJIE	)	

UNITED STATES' PROPOSED VOIR DIRE QUESTIONS

The United States requests the following questions be asked of prospective members of the jury, in addition to those questions that are included on the standard jury questionnaire:

I. Parties

1. Does any juror know the defendant, Bernard Okojie, or any relative of the defendant?

2. If so, how do you know that person? For how long have you known him or her?

3. Does any juror know the defendant's attorney, John Ossick?

4. Does anyone belong to any social, business, professional, fraternal, or religious organization or association with the following:

   a. the defendant?

   b. any members of his family?

   c. the defendant's attorney?

   d. Any member of the defense attorney's law practice?

   e. As to the defense counsel, his paralegal(s), investigator(s), or support staff?

f. If so, will your acquaintanceship with this person cause you to be unable to render a fair verdict in this case?

5. Has any juror heard anything about this case?

a. If you have, do you think that you can put that aside and determine the case solely on the evidence presented during the trial?

6. Have you or any of your close friends or relatives had any personal dealings with the United States Attorney's Office, the Small Business Administration (SBA) or the Federal Bureau of Investigation (FBI)?

a. If yes, what kind of contact? Have those dealings affected your ability to be fair and open-minded today?

II. Experience with Financial Institutions, Lenders or Processors, the SBA, and the PPP and EIDL Programs

7. The indictment in this case alleges that the defendant defrauded the Small Business Administration by obtaining loans issued during the COVID-19 pandemic. The loans in this case were issued through the Economic Injury Disaster Loan Program, commonly called "EIDL," and the Paycheck Protection Program, commonly called "PPP."

a. Have you, a family member, or close friend ever received or applied for a loan under the PPP or EIDL program? Please provide details.

b. Do you have opinions regarding COVID relief funding, including the PPP and EIDL program, that would keep you from being fair and impartial?

c. Do you have any opinions regarding COVID-19 that would prevent you from being fair and impartial?

8. Do you own a small business? If so, approximately how many employees do you have?

9. Have you, a family member, or a close friend ever worked for a bank, lender, loan processor, or other financial institution? To your knowledge, did that involve making or processing PPP loans?

10. Have you, a family member, or a close friend ever worked for the United States Small Business Association ("SBA")? To your knowledge, did that work involve processing EIDL loans?

11. You may hear testimony from representatives of the SBA. Have you had any experiences with the SBA that would make it difficult for you to evaluate that testimony fairly and impartially?

12. Do you think you could be fair and impartial in weighing the evidence in a case in which the government is a victim?

III. Experience with Fraud

13. Have you, a family member, or a close friend ever been the victim of fraud? Please provide details. Is there anything about that experience that would interfere with your impartiality in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

IV. Experience with Law Enforcement

14. Have you, a family member, or a close friend ever been arrested, charged, or convicted of any crime? If so, what was the crime? How was it resolved? Would that experience affect your ability to be a fair and impartial juror in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

15. Have you, a family member, or a close friend ever had a negative or an unpleasant experience with law enforcement? If so, what happened? Would that experience affect your ability to be a fair and impartial juror in this case?

16. Have you, or has anyone close to you, ever been falsely accused of committing a crime?

17. Have you, or has anyone close to you, ever filed a lawsuit or complaint concerning the conduct of a law enforcement officer?

18. You may hear testimony in this case from federal law enforcement agents. Is there anything that you have experienced, seen, heard, or read about that would prevent you from considering their testimony fairly and impartially?

19. Do you have any opinions or feelings about the criminal justice system, such as judges, prosecutors, defense lawyers, and law enforcement officers, that would make it difficult for you to be a fair and impartial juror in this case?

V. Knowledge of Potential Witnesses

20. Do you know or are you familiar with any of the following individuals, who may be witnesses in this case? [The government respectfully requests the Court

read the government's and defendant's witness lists.]

VI. Punishment and Sympathy

21. Have you previously served in a jury for a criminal or civil case? What was the result? Do you have any reservations about sitting in judgment of an accused person and returning a verdict in a criminal case?

22. There are some people who, for moral, ethical, or religious reasons, believe that it is not proper or who would find it difficult to pass judgment on the conduct of others. Do any of you hold such a belief, or might you be affected by such beliefs?

23. The potential punishment for the charged offenses is a matter that the jury should never consider in arriving at an impartial verdict. If you are selected as a juror, can you put aside any concerns you may have about potential punishment in arriving at a fair and impartial verdict in this case?

24. If the Court instructs you that your verdict must not be based on sympathy, passion, or prejudice, but only on the evidence in this case and on the law as the Court instructs you on it, will you be able to follow that instruction?

25. Knowing what you now know about this case, do you have any reservations about your ability to hear the evidence, deliberate with your fellow jurors, and return a fair and impartial verdict?

VII. Ability to Serve

26. Do you have any difficulty understanding the English language or seeing or hearing things in the courtroom that could impair your ability to be a juror in this case?

VIII. COVID-19 Considerations

27. Do you have concerns about safely serving on a jury over the course of multiple days? Would those concerns affect your ability to be a fair and impartial juror in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

28. Do you have safety concerns about deliberating with other jurors in the same room? Would those concerns affect your ability to be a fair and impartial juror in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

Respectfully submitted this 7th day of March 2023.

JILL E. STEINBERG
UNITED STATES ATTORNEY

/s/ Matthew A. Josephson
Matthew A. Josephson
Assistant United States Attorney
Georgia Bar No. 367216
Email: Matthew.Josephson@usdoj.gov
Post Office Box 8970
Savannah, Georgia 31412
T: (912) 652-4422

/s/ Jennifer A. Stanley
Jennifer A. Stanley
Assistant United States Attorney
Alabama Bar No. 8400E77T
Email: Jennifer.Stanley@usdoj.gov
Post Office Box 2017
Augusta, Georgia 30903
T: (706) 826-4525

CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the notice of electronic filing ("NEF") that was generated as a result of electronic filing in this Court.

This 7th day of March 2023.

JILL E. STEINBERG
UNITED STATES ATTORNEY

/s/ Jennifer A. Stanley
Jennifer A. Stanley
Assistant United States Attorney
Alabama Bar No. 8400E77T
Email: Jennifer.Stanley@usdoj.gov
Post Office Box 2017
Augusta, Georgia 30903
T: (706) 826-4525