

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Case No. 1:22-cr-00171-MLB-RDC
	)	Second Superseding
CARL DELANO TORJAGBO,	)	
a/k/a Karl Lucius Delano.	)	
_____	)	

DEFENDANT'S PROPOSED VOIR DIRE

COMES NOW the Defendant, CARL DELANO TORJAGBO, a/k/a Karl Lucius Delano, by and through counsel, and files the following proposed voir dire as directed by the Court:

[To be asked by Defense counsel].

- 1) Does anyone here do business with or know of the businesses Kremkov Industries or Flying Jack Freight & Logistics?
- 2) Who here has received a PPP Loan, or has a family member or close personal friend who has received a PPP Loan?
- 3) Who applied but was turned down for a PPP Loan?
- 4) Among those who received a PPP Loan, who had their loan forgiven?
- 5) Among those who received a PPP Loan, who had to pay it back?

- 6) Who has worked for or currently works for a bank or savings and loan?
- 7) Who here banks with or has a relationship with JP Morgan Chase Bank?
- 8) Who here has owned or run their own business?

[Follow up -]

- a. If so, do or did you rent or own your office space?
- b. How many employees?
- c. Did you do the hiring and firing?

9) Among the business owners, who has had private investors in their company?

- 10) Who has prepared and filed their own taxes?
- 11) Who has had their taxes prepared by someone else to file?
- 12) Has anyone here ever been audited by the IRS or Treasury Department?
- 13) Who has had problems or issues with the IRS or a state department of revenue, or a state tax agency?

(a) [Follow up - please explain.]

14) Who here is familiar with the country of Ghana or has a close friend or family member from Ghana?

[Follow up ? How ? Who ?]

15) You will learn in this case that Mr. Delano Torjagbo is from Ghana but is now a naturalized U.S. Citizen. Is there anybody who cannot fairly judge his case because of his national origin?

16) Is there anyone here who has knowledge or information about the operation of gold mines?

17) Who here thinks Mr. Delano Torjagbo is probably guilty just because he has been charged with a crime?

18) Who here has legally changed their name, or has a close friend or family member who changed their name?

19) Is anyone here employed by a law enforcement agency, related to or closely acquainted with any employee of — a state, county or a federal law enforcement agency such as IRS, the FBI or a local police, sheriff's department?

20) Has anyone here worked as a volunteer, intern or employee for any law enforcement agency, prosecutor's office or probation office on the local, state, or federal level?

21) Has anyone here ever worked for any prison, jail or correctional institution?

22) Anyone here ever work as an EMT or paramedic?

23) Has anyone here ever had to testify as a witness or victim in court?

24) For those who have served in the military, have any of you ever participated in a court martial?

25) Does anyone think a federal agent or police officer is more believable than a regular defense witness?

I 26) Who here has a bumper sticker on their car?

[Follow up - If so, what does it say ?]

27) Mr. Delano Torjagbo is charged with PPP loan fraud, aggravated identity theft, wire fraud upon the IRS, and two types of money laundering. Is there anybody here who, due to the nature of the charges, cannot fairly judge the case based solely upon the evidence presented and the law as instructed by the Court?

28) Is there anybody here, who just sitting here looking at Mr. Delano Torjagbo, has already made up their mind and formed an opinion about his case ?

WHEREBY, Carl Torjagbo requests that his counsel be allowed to ask the above questions of the prospective jurors, and that counsel be allowed to

ask reasonable follow-up questions in response to those answers given.

Dated: This 20th day of May, 2025.

Respectfully submitted,
s/ **L. Burton Finlayson**
L. BURTON FINLAYSON
Attorney for CARL DELANO TORJAGBO
Georgia Bar Number: 261460

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CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed the Defendant's Proposed Voir Dire with the Clerk of Court using the CM/ECF system which will automatically send email notifications of such filing upon all counsel of record including the following:

Ms. Kelly Connors, and
Mr. Nick Evert
Assistant United States Attorneys
600 U.S. Courthouse
75 Ted Turner Drive, S. W.
Atlanta, Georgia 30303

DATED: This 20th day of May, 2025.

s/ L. Burton Finlayson

L. BURTON FINLAYSON
ATTORNEY FOR CARL DELANO TORJAGBO
State Bar Number: 261460