UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

UNITED STATES OF AMERICA

v. **CRIMINAL NO. 2:24-cr-00192**

KISHA SUTTON, ET AL.

PROPOSED VOIR DIRE QUESTIONS OF THE UNITED STATES

Comes now the United States of America, by Jonathan T. Storage, Assistant United States Attorney for the Southern District of West Virginia, and respectfully requests the Court to ask the following voir dire questions of the jury panel.

1. It has been estimated by the attorneys that it may take four working days to complete the trial of this case. Do any of you have any reason to believe that you would not be able to serve as a juror for that period of time?

(This would include any personal or business obligations that might cause an interruption in the trial of this case.)

a. Would serving as a juror on this case have any adverse effect with regard to your family life or your job?

b. Do you have any physical or medical problems that might make it difficult to follow the evidence or sit on the jury?

2. Are any of you acquainted with or have any kind of relationship, professionally or personally, including through social networking websites such as "X", Instagram, and/or Facebook, with any of the following individuals who may be called as witnesses in this case?

a. Ben Wood, Task Force Officer with the FBI

b. Greg Lipari, Special Agent with the FBI

c. Kisha Sutton

d. Shamiese Wright

e. Damisha Brown

f. William Powell

g. Jasmine Spencer

h. Cylena Sutton

i. Rahmel Meekins

3. Are any of you acquainted with, professionally or personally, including through social networking websites such as Twitter and/or Facebook, or have you or any of your family members ever been represented by any of the following?

a. Jonathan T. Storage or Jennifer D. Gordon, Assistant United States Attorneys, or any other member of the United States Attorney's Office

b. Connor Robertson, Esq.

c. Michelle Fox, Esq.

4. Are you or any member of your family related to or acquainted with the defendants, KISHA SUTTON or SHAMIESE WRIGHT, professionally or personally, including through social networking websites such as "X", Instagram, and/or Facebook?

5. Are any of you acquainted with or have any relationship, professionally or personally, including through social networking websites such as "X", Instagram, and/or Facebook, or otherwise, with any other member of the jury panel? If yes, would this in any way affect your ability to decide this case solely on the law and the evidence presented? (If yes, consideration should be given to making further inquiry outside the presence of the prospective jurors.)

6. Have you, any member of your family, or any close personal friends ever been questioned or arrested by a law enforcement officer? (You may approach the bench to answer this question if you would like. If yes, consideration should be given to making further inquiry outside the presence of the prospective jurors.)

7. Have you, any member of your family, or any close personal friend, ever been charged with or convicted of committing either a felony or a misdemeanor? (You may approach the bench to answer this question if you would like. If yes, consideration

should be given to making further inquiry outside the presence of the prospective jurors.)

8. Have you, any member of your family, or any of your close friends ever been incarcerated? (You may approach the bench to answer this question if you would like. If yes, consideration should be given to making further inquiry outside the presence of the prospective jurors.)

9. Have you read about this case, or any other article about the defendant in the newspapers, either online on in print? (If yes, consideration should be given to making further inquiry outside the presence of the prospective jurors.)

10. Have you heard or seen anything about this case, or about the defendant generally on the radio or television? (If yes, consideration should be given to making further inquiry outside the presence of the prospective jurors.)

11. Have you heard or read anything at all from any source about the facts of this case, including on or through social networking websites such as "X" and/or Facebook? (If yes, consideration should be given to making further inquiry outside the presence of the prospective jurors.)

12. Do you, of your personal knowledge, excluding what you have read in the newspapers or heard through the media, have any information about the facts of this case?

13. Have you discussed any aspect of this case with anyone who claimed to have some knowledge of what actually occurred, including on or through social networking websites such as Twitter and/or Facebook?

14. Notwithstanding what you have heard on the television or radio, what you have read in the newspapers, or what you have read and/or discussed on or through social networking websites such as "X" and/or Facebook, would you be able to sit as a juror in the case and render a verdict based solely upon the law and the evidence presented?

15. Is there any reason at all why you should not sit on this case?

16. Are you or have you ever been involved in any conflict, controversy, or litigation with the United States Attorney's Office? [If yes, would this affect your ability to sit as an impartial juror in this case?]

17. Are you or have you ever been involved in any conflict, controversy or litigation with any department or agency of the United States? [If yes, would this affect your ability to sit as an impartial juror in this case?]

18. Have you ever served as a petit juror in a criminal or civil case either in federal or state courts? [If so, what was the case and what was the outcome?]

19. Have you ever served as a grand juror on either a federal or state panel?

20. Have you or your family ever participated in a lawsuit as a party or witness or in some other capacity? (If so, what was the case about and what was the outcome?)

21. Have you or any member of your family ever participated in a criminal trial, either as a witness for the prosecution or the defense, or in some other capacity? [If so, what was the offense charged and the verdict.]

22. Are any of you related by blood, marriage, adoption, or by any other means, to any law enforcement officers, either local, state or federal?

23. Have you or any member of your immediate family ever been the victim of a crime?

24. Are any of the panel members related by blood, marriage, adoption, or by any other means, to any person who has been prosecuted by the United States?

25. Have any of the panel members expressed or do any panel members have any strong sentiment about the justness of any recent prosecution brought by the United States Attorney's Office in this District?

26. This case is being prosecuted by the federal government. Have any of you ever had any difficult or unpleasant experiences

with the federal government or the United States Attorney's Office, or do any of you have very strong personal feelings against the federal government for whatever reason?

27. Some of the witnesses who may be called to testify include local, state, and/or federal law enforcement officers. Do any of you have any strong feelings for or against law enforcement officers for whatever reason?

28. Have you or any member of your family or any of your close friends ever filed a lawsuit or complaint concerning the conduct of a law enforcement officer?

29. Have you, or has anyone close to you, ever been the victim of a crime? If so, would that experience prevent you from giving either the government or the defendant a fair trial?

30. Have you or any of your immediate family members ever been the victim of bank fraud?

31. Are any of you or your family, members of any anti-government group including, but not limited to, paramilitary organizations or militias?

32. Does any member of the jury panel believe that they would have trouble following the Court's instructions regarding the law if they disagreed with it?

33. Irrespective of your personal feelings about any issue that may arise in this case, will you follow the law as the Court gives it to you during this case?

34. Even if you disagree with the law, would you be able to return a verdict of guilty, if the prosecution meets its burden beyond a reasonable doubt?

35. 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. Is there any one of you who holds such beliefs, or who might be affected by such beliefs?

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

37. Have any of you or your close family members been contacted in any way, via telephone, in writing, or on or through social networking websites such as Twitter, Instagram, and/or Facebook, by any of the parties in this case including defendants KISHA SUTTON and SHAMIESE WRIGHT, or any of their family members, lawyers, or the United States Attorney's Office?

38. If you were one of the parties in this case, do you know of any reason why you should not be content to have someone in your frame of mind sitting on the jury in this case?

The United States respectfully requests that the Court ask appropriate follow up questions if any juror answers in the affirmative.

Respectfully submitted,

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Acting United States Attorney

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/s/ Jonathan T. Storage
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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "PROPOSED VOIR DIRE QUESTIONS OF THE UNITED STATES" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this the 27th day of May 2025.

/s/ Jonathan T. Storage
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