

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 22-20290-Cr-Bloom(s)

UNITED STATES OF AMERICA

vs.

ERIC DEAN SHEPPARD,

Defendant.

UNITED STATES' PROPOSED VOIR DIRE QUESTIONS

Pursuant to Fed. R. Crim. P. 24(a), the United States respectfully requests that, in addition to the Court's standard questions, the Court ask the following questions during voir dire of the jury panel. The United States further requests that the parties be allowed to propose additional voir dire questions as may become appropriate during the examination of potential jurors.

1. GENERAL BACKGROUND

- a. Have you or someone close to you been involved in a lawsuit or court proceeding?
 - i. What type of case was it?
 - ii. Were you, or someone close to you, a party in the case, or a witness?
 - iii. Is your impression that the proceeding was fair?
 - iv. What is your impression of how you or someone close to you was treated?
- b. Do you feel that you could not judge another person for a criminal act, whether on religious, moral, personal or any other ground?

- c. Do you have any views about law or procedure that would make you unable to follow the Court's instructions on the law in this case?

2. EXPERIENCE WITH LAW ENFORCEMENT

- a. Have you or someone close to you had any experience with law enforcement?
 - i. Was it local law enforcement, like a police officer, or was it federal law enforcement, like the FBI?
 - ii. What is your impression of how you or the person close to you was treated?
- b. Other than filing taxes, have you or someone close to you had any experience with the Internal Revenue Service (IRS)?
 - i. What happened?
 - ii. What is your impression of how you or the person close to you was treated?

3. EXPERIENCE WITH BUSINESS, BANKS, LOANS, AND THE SBA

- a. Do you or someone close to you own a business?
 - i. What type of business is it?
 - ii. Does it have employees?
 - iii. How many?
- b. Have you or someone close to you applied for a Paycheck Protection Program (PPP) loan or an Economic Injury Disaster Loan (EIDL)?
 - i. If so, were the loans received, and what were the amounts of the loans?
 - ii. What is your impression of the experience with the application and the loan?

- c. Have you or someone close to you applied for any other type of loan through the government, including through the Small Business Administration (SBA)?
 - i. What type of loan was it?
 - ii. What is your impression of the experience with the application and the loan?
- d. Have you or someone close to you had a negative experience with a bank?
 - i. What happened?
 - ii. Would your feelings about that experience affect your ability to be fair in this case?

Respectfully submitted,

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UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 18, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via Notices of Electronic Filing generated by CM/ECF.

s/Ana Maria Martinez
Ana Maria Martinez
Assistant United States Attorney