

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICAN,

PLAINTIFF,

V.

CASE NO.: 2:24-cr-00192-01

KISHA SUTTON,

DEFENDANT.

DEFENDANT KISHA SUTTON'S PROPOSED VOIR DIRE

NOW COMES the Defendant, Kisha Sutton, by and through her counsel, Connor Robertson, and submits the following proposed voir dire:

1. Do you know me (Judge Irene C. Berger), any of the courtroom personnel, or any of the attorneys in this case?
2. Do any of you know any of the following named Defendants in this case:
 - a. Kisha Sutton;
 - b. Shamise Wright;
 - c. Cylena Sutton;
 - d. Rahmel Meekins;
 - e. William Powel;
 - f. Damisha Brown;
 - g. Jasmine Spencer.
3. Do you know or recognize any other prospective juror in the courtroom this morning?

4. Do you know or are you acquainted with any of the following potential witnesses in this case? (Read Witnesses)
5. Have you or any members of your family or anyone close to you ever been charged with or convicted of a crime? If yes, defendant would request that the panel member(s) be asked to further explain his or her answer.
6. Have you or any members of your immediate family ever been addicted to any prescription medications and/or illegal controlled substances? If yes, defendant would request that the panel member(s) be asked to further explain his or her answer.
7. Have you or any members of your family, or anyone close to you ever been the victims of monetary fraud or theft? If yes, defendant would request that the panel member(s) be asked to further explain his or her answer.
8. Have you or any member of your family or close friend(s) ever been the victims of a crime?
 - a. What was the nature or the crime?
 - b. Was the perpetrator punished?
 - c. What was the result?
 - d. Were you satisfied with the result?
9. Have you, any of your family members, or close friends ever held a job in (a) law enforcement agency, such as the police or prosecutors' office, (b) any government agency, or (c) a private detective or security guard agency? What did you (they) do there?

10. Have you, or any of your family members, or close friends ever held a job as a parole or probation officer?
11. Does your job cause you to work with any law enforcement agency?
12. Have you or any of your family members been incarcerated? (When, where)
13. Have you or any members of your immediate family ever been a confidential informant or undercover informant for any law enforcement agency or prosecuting attorney's office? If yes, defendant would request that the panel member(s) be asked to further explain his or her answer.
14. Have you read or heard anything at all from any source, including, but not limited to relative or friends of yours who might work for police authorities or the radio, television, internet, or newspapers, about this case? If yes, defendant would request that the panel member(s) be asked to further explain his or her answer.
15. Would jury service have any adverse effect on you with regard to your job or family?
16. Are you or have you ever been involved in any conflict, controversy, or litigation with the Department of Justice or the Office of the United States Attorney for the Southern District of West Virginia?
17. Do you believe that a person charged with a crime probably did it?
18. Do you believe that a person charged with a crime must prove his or her innocence?
19. Is there any person, who for religious reasons, feels it is not fair to judge another person for their acts?
20. Is there anyone on the panel that would believe the testimony of a law enforcement officer over the testimony of any other witness?
21. Is there anyone on the panel that is a small business owner?

22. IS there anyone on the panel that filled out a Paycheck Protection Loan during covid?
23. Is there anyone on the panel that believes the Paycheck Protection Loans the government provided during covid were irresponsible?
24. Did anyone on the panel have any type of loan provided during the Covid pandemic forgiven?
25. Is there any panel member who is an accountant or tax preparer?
26. Is there any panel member who is familiar with "CashApp" "Venmo" or other like money transfer applications?
27. Is there any panel member who is familiar with the technology associated with an "I.P. Address" or how an "I.P. Address" works?

Respectfully submitted,

By Counsel,

S:// Connor D. Robertson
Connor Robertson (11460)
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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

UNITED STATES OF AMERICA,

PLAINTIFF,

V.

CASE NO.: 2:24-CR-000192-01

KISHA SUTTON,

DEFENDANT.

CERTIFICATE OF SERVICE

I, Connor Robertson, certify that on the 1st day of April, 2025, a copy of the foregoing
“**Defendant Kisha Sutton’s Proposed Voir Dire**” was served on the United States by ECF,
to Jonathan Storage, Assistant United States Attorney to the following:

Jonathan Storage
Assistant United States Attorney
Jonathan.Storage@usdoj.gov

S:// Connor D. Robertson
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