UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.: 23-60173-CR-WILLIAMS

UNITED STATES OF AMERICA

vs.

CAROLYN DENISE WADE,

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.

GENERAL

1. Your duty, as jurors, is to judge guilt or innocence based upon the evidence. It is the duty of the judge to determine punishment if you vote guilty. The law does not permit you to consider the issue of punishment because there are factors having nothing to do with this trial that will determine lenience or harshness. However, some people believe that people should not be incarcerated for committing certain types of crimes. Does anyone believe that regardless of the evidence, they might vote "Not Guilty" simply because a conviction may result in a prison sentence, even though you do not know whether it will or not?

2. Do any of you have any beliefs or convictions, whether moral, religious, philosophical, or otherwise, that would prevent you from being a fair and impartial juror in this case or that would make it difficult for you to reach a verdict based on the evidence and the law as it applies to the evidence?

3. Have you or someone close to you been involved in a lawsuit or court proceeding?

a) What type of case was it?

b) Were you, or someone close to you, a party in the case, or a witness?

c) Is your impression that the proceeding was fair?

d) What is your impression of how you or someone close to you was treated?

EXPERIENCE WITH LAW ENFORCEMENT AND GOVERNMENT AGENCIES

4. Have you, your spouse, or any of your close relatives or friends, ever had any dealings or involvement with the Federal Bureau of Investigations, Broward County Sheriff's Office, the Department of Justice, or any other federal, state, or local law enforcement agency?

a) If you have, were those dealings positive or negative?

b) Do you believe that would affect your ability to be a fair and impartial juror to both sides in this case?

5. Police officers, federal law enforcement agencies, and the criminal justice system are often the topic of current events and news stories, and these events can shape the way that individuals view the criminal justice system in both positive and negative ways. Does anyone feel that any current events, or any other knowledge or personal views that you have about police officers, federal law enforcement agencies, or the criminal justice system, will lead you to favor or disfavor either the United States or the Defendant in sitting as a juror in this case?

6. Other than filing taxes, have you or someone close to you had any experience with the Internal Revenue Service (IRS)?

a) What happened?

b) What is your impression of how you or the person close to you was treated?

EXPERIENCE WITH BUSINESS, THE SBA, AND PANDEMIC RELIEF FUNDS

7. Do you or someone close to you own a business?

a) What type of business is it?

b) Does it have employees?

c) How many?

8. Have you or someone close to you applied for a Paycheck Protection Program (PPP) or an Economic Injury Disaster Loan ("EIDL")?

a) If so, were the loans received, and what were the amounts of the loans?

b) What is your impression of the experience with the application and the loan?

c) Do you have strong feelings, either positive or negative, about the way that the SBA and/or its participating lenders administered the PPP or EIDL? If so, please explain.

d) Do you have strong feelings, either positive or negative, in general about any government financial assistance program during the pandemic? If so, please explain.

9. Have you or someone close to you applied for any other type of loan through the government, including through the Small Business Administration (SBA)?

a) What type of loan was it?

b) What is your impression of the experience with the application and the loan?

10. The Defendant is charged with fraudulently obtaining a Paycheck Protection Program loan. Knowing the offense charged, does anybody here feel that they may be more likely to side with the government over the Defendant in deciding the Defendant's guilt or innocence? Does anybody feel that they may be more likely to side with the Defendant over the government because of the offense charged?

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

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