

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 3:16-cr-93-J-32JRK

CORRINE BROWN

**UNITED STATES' PROPOSED
VOIR DIRE EXAMINATION QUESTIONS**

I. STATEMENT OF THE CASE

The Indictment in this case charges the Defendant, Corrine Brown, with twenty-two counts. Count One charges the Defendant with conspiracy to commit mail fraud and wire fraud pursuant to Title 18, United States Code, Sections 1349, 1341, and 1343. Count One alleges, among other things, that the Defendant engaged in a conspiracy in which she, and others, sought to enrich themselves primarily by raising funds for a purported educational charity, One Door for Education – the Amy Anderson Scholarship Fund, under false pretenses and then diverted the bulk of the funds for their personal use. The conspiracy is alleged to have spanned from in or about late 2012 through in or about early 2016.

Corrine Brown is also charged with seven separate counts of aiding and abetting mail fraud (Counts Two through Eight), and nine separate counts of aiding and abetting wire fraud (Counts Nine through Seventeen).

Corrine Brown is not charged in Count Eighteen of the Indictment. You will

not render a verdict on Count Eighteen.

Count Nineteen charges Corrine Brown with engaging in a scheme to conceal material facts related to her income on certain financial disclosure forms, which she was required to file with the United States House of Representatives for calendar years 2012, 2013, 2014, and 2015.

Corrine Brown is not charged in Count Twenty of the Indictment. You will not render a verdict on Count Twenty.

Count Twenty-One charges Corrine Brown with corruptly endeavoring to obstruct and impede the due administration of the Internal Revenue laws in connection with the filing of her U.S. Individual Income Tax Returns (IRS Form 1040) for tax years 2008 through 2014 by underreporting her income and inflating her charitable deductions.

Counts Twenty-Two, Twenty-Three, and Twenty-Four charge Corrine Brown with filing false U.S. Individual Income Tax Returns (IRS Form 1040) for tax years 2012 (Count Twenty-Two), 2013 (Count Twenty-Three), and 2014 (Count Twenty-Four).

II. PARTIES AND WITNESSES

1. [Court will at this time introduce defendants, counsel, and case agent(s); or direct respective counsel to do so]

2. Do any of you personally know any of the attorneys for the United States, any of the case agents, or any of the other government personnel who were

just identified?

3. The Defendant, Corrine Brown, was a Member of the United States House of Representatives and previously a state legislator in Florida. Do any of you personally know the defendant?

4. Do any of you personally know the attorney for the defendant?

5. I will read [or have the attorneys read] the names of persons who may appear as witnesses. Please advise me, after their names have been read, whether you know them or have any acquaintance with them. [Counsel or Court read witness lists.]

III. CONFLICTS WITH SERVICE - NATURE OF CASE

1. It is anticipated that this trial will be concluded in about twelve to fifteen trial days. Is there anything about the anticipated duration of trial that would affect your ability to serve on this jury and to concentrate on the trial and its proceedings with your full attention and render a fair and impartial verdict?

2. Is there anything about the nature of the charges or the types of offenses with which the defendant is charged that would in any way affect your ability to sit as a fair and impartial juror?

IV. GENERAL QUESTIONS TO PANEL

1. Have any of you ever served on a jury before?

- (a) Federal Court:
 - (1) Civil
 - (2) Criminal

- (b) State Court:
 - (1) Civil
 - (2) Criminal

- 2. Without stating the result, were you able to reach a verdict in the case?
- 3. Has anything ever happened to you while serving as a juror prior to this case that would make it difficult for you now to serve as a fair and impartial juror?
- 4. Have any of you ever served as a member of a Grand Jury?
- 5. Have any of you ever appeared in Court yourself personally either as a witness in a case or as a party in a lawsuit?
- 6. Have any of you ever had any claim or lawsuit or any other type of litigation against or with the United States or one of its agencies?
- 7. Are any of you suffering from a physical disability, which would make it difficult for you to serve as an alert juror during the trial of this case?
- 8. Have any of you ever been the victim of a crime?
- 9. Has any member of the jury panel, or any family member, relative, or close personal friend or acquaintance of yours, ever been employed as a law enforcement officer or otherwise been employed by or associated with a federal, state, or local law enforcement agency?
- 10. Has any member of the jury panel, or any family member, relative, or close personal friend or acquaintance of yours, ever been investigated by any federal, state, or local law enforcement agency?
- 11. Have you or any family member, relative, or close friend ever been

arrested, charged, or convicted of any crime?

12. Has anyone ever been a witness in any type of court or judicial proceeding? If so, what type of proceeding did you give testimony in?

13. Does any member of the jury panel have any strong feelings or opinions one way or the other concerning the United States government generally or, more specifically, the Federal Bureau of Investigation (FBI) and the Internal Revenue Service (IRS)?

14. Has any member of the jury panel, or any family member, relative, or close personal friend or acquaintance of yours, ever had any interactions with the FBI or IRS (other than filing tax returns)?

15. Have you or any family member, relative, or close friend been the victim of a fraud?

16. You may hear testimony from cooperating defendants who have pleaded guilty to a federal crime and entered into cooperation plea agreements with the government. Do any of you believe that it is inappropriate for the United States to enter into plea agreements with defendants or co-conspirators?

17. These plea agreements provide that in return for the cooperating defendant's truthful and complete cooperation, the government has agreed to consider asking a judge to sentence the cooperating defendant to a lower sentence. Would the fact that a witness testified pursuant to a cooperation plea agreement prevent you from fairly considering his or her testimony?

18. Do any of you have strong feelings (one way or the other) about the defendant, Corrine Brown?

19. Have any of you ever actively supported or opposed the defendant during her time in public office, either in the United States House of Representatives or the Florida Legislature?

20. Do any of you have political views, one way or the other, that would affect your ability to consider the evidence presented at trial and render a fair and impartial verdict?

21. This is, of course, a criminal case wherein the law sets forth certain punishments to be applied in the sole discretion of the Judge, within bounds as set forth by Congress. Are there any of you who, for religious, moral, ethical or philosophical reasons, would simply rather not be called upon to decide the guilt or innocence of the accused?

22. If one or more of the instructions on the law given to you by the Court are in conflict with your own personal beliefs, or if you disagree with any one of the Judge's instructions, will you still abide by the Court's instructions on the law and put your own personal beliefs aside?

23. Is there any additional information that would affect your ability to render an impartial verdict in this case and that has not been addressed by my other questions?

Respectfully submitted,

W. STEPHEN MULDROW
Acting United States Attorney

/s/ A. Tysen Duva

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 14, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

James Wesley Smith, III (Counsel for Defendant Corrine Brown)

/s/ Michael J. Coolican
Michael J. Coolican
Assistant United States Attorney