

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 3:18-cr-89-J-34JRK

KATRINA BROWN
REGINALD BROWN

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

I. 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 defendants, Katrina Brown and Reginald Brown, were both Members of the Jacksonville City Council. Do any of you personally know either defendant?

4. Do any of you personally know the attorneys for the defendants?

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.]

II. CONFLICTS WITH SERVICE - NATURE OF CASE

1. It is anticipated that this trial will be concluded in about eight to ten 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 defendants are charged that would in any way affect your ability to sit as a fair and impartial juror?

III. 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 duties and roles of agents of the Federal Bureau of Investigation (FBI) and the Internal Revenue Service (IRS) investigating potential crimes? How about any such feelings towards prosecutors for the United States Attorney's Office

for the Middle District of Florida or the Justice Department?

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

17. Have any of you ever actively supported or opposed either defendant during their time in public office?

18. 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?

19. 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?

20. 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?

21. 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,

MARIA CHAPA LOPEZ
United States Attorney

/s/ Tysen Duva

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 3, 2019, 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:

Richard Landes (Counsel for Katrina Brown)

John Leombruno (Counsel for Katrina Brown)

Thomas Bell (Counsel for Reginald Brown)

/s/ Tysen Duva
Tysen Duva
Assistant United States Attorney