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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHELE FIORE,

Defendant.

Case No. 2:24-cr-00155-JAD-DJA
Joint Proposed Jury Voir Dire

The United States of America, by and through its attorneys, Corey R. Amundson, Chief, United States Department of Justice, Public Integrity Section, and Alexander Gottfried and Dahoud Askar, Trial Attorneys, along with defendant Michele Fiore, by and through her attorney, Michael Sanft, hereby submits this list of proposed voir dire questions to be asked in conjunction with the questions proposed by the Court in the trial in the above-captioned matter set for Tuesday, September 24, 2024, at 9:00 am. The parties respectfully request the right to propose additional voir dire questions as circumstances demand.

1. This is a criminal case entitled *United States v. Michele Fiore*. The Defendant is charged with defrauding donors to a charity and political action committee. Do you know or have you heard anything about this case?

- a. (at sidebar) What have you heard about the case? Would you be able to put aside what you have heard about the case and be render a fair and impartial verdict based on the evidence admitted at trial and the Court's instructions on the law?

2. The Government in this case is represented by Trial Attorneys Dahoud Askar and Alexander Gottfried of the Public Integrity Section of the Department of Justice. The Defendant is represented by attorney Michael Sanft. The Defendant is Michele Fiore. Do you know any of these people?

3. [A list of witnesses expected to testify at trial will be read to the jury] Do you *personally* know any of the witnesses whose names have been read to you? (Some of the names that have been read to you are people whom you may have read about or seen in the news. I will ask you separately about that later.)

4. This case is being investigated and prosecuted by the Federal Bureau of Investigation ("FBI") and the United States Department of Justice ("DOJ"). Do you have any strong opinions about the FBI or DOJ?

- a. If so, could you describe the nature of your opinion?
- b. Do you believe that you would you be able to set aside your opinion and be fair and impartial in this case?

5. Do you have any strong feelings about the federal government in general (including federal agencies such as the Internal Revenue Service, Bureau of Land

Management, or Bureau of Alcohol, Tobacco, Firearms, and Explosives) which could affect your ability to be fair and impartial in this case?

- a. If so, could you describe the nature of your opinion?
- b. Do you believe that you would you be able to set aside your opinion and be fair and impartial in this case?

6. Have you, or has a family member or close friend, ever been placed under arrest or charged with a criminal offense? If so, please describe generally the circumstances.

- a. What was the general nature of the charge(s)?
- b. When did this occur?
- c. How were the charges resolved?
- d. Is there anything about your experience or knowledge of this event that could cause you to have any bias or animosity toward law enforcement agents, the government in general, or the prosecution team in this case?

7. Have you, or has any member of your family or close friend, ever been questioned or interviewed by the police or a law enforcement agent in connection with a criminal investigation?

- a. Please identify the agency or agencies conducting the investigation and the nature of the investigation.
- b. Is there anything about your experience or knowledge of this event that could cause you to have any bias or animosity against law enforcement agents, the government in general, or the prosecution team in this case?

8. Have you, or has any member of your immediate family or close friend, ever been the victim of a crime?

- a. If yes, please describe the general nature of the crime.

- b. When did the crime occur?
 - c. Was it reported to the police?
 - d. How do you feel about how it was handled by the police?
 - e. Was it handled by a prosecuting agency such as the United States Attorney's Office or the District Attorney's Office?
 - f. How do you feel about how it was handled by the prosecutors?
 - g. Is there anything about your experiences that would cause you to have a bias for or against any party to this case?
9. Have any of you have received any training or education in the law or the criminal or civil justice system, whether in law school, college, or otherwise?
- a. If so, please describe the general nature of your training or education?
 - b. Is there anything about your training or knowledge that would affect your ability to be fair and impartial toward either the defendant or the government?
 - c. Can you set aside your own knowledge and training and follow the Court's instructions on the law?
10. Have any of you previously served on a jury or grand jury?
- a. When you served as a juror in a prior case, was it a criminal case or a civil case?
 - b. Did you reach a verdict?
 - c. Was there anything about your experience as a juror which would make you not want to serve again, or that could affect your ability to be fair and impartial in this case?
11. Is there anyone here who has testified in a court proceeding before?
- a. Please describe the basic circumstances.

- b. When/where did you testify?
 - c. Was it in a criminal or civil matter?
 - d. Would your experience affect your ability to be fair and impartial to both sides in this case?
12. Please provide the following biographical information:
- a. What is your current occupation?
 - b. What is the highest level of school that you have completed?
 - c. Are you married?
 - d. If you are married, what is your spouse's occupation?
 - e. Do you have any children? What are their ages?
13. Do you follow the news? If so, what sources do you get your news from?
14. Do you use social media? If so, what platforms do you use, and what do you use them for?
15. What is your favorite movie and why?
16. Would serving as a juror in this case be an extreme hardship to anyone?
17. Does anyone have a disability or health or physical problem that would make it difficult to serve on this jury?
18. Does anyone have any difficulty reading or understanding the English language?
19. In this case, the government alleges that the defendant defrauded donors to a charity and political action committee. Do any of you regularly donate time or money to charitable or political causes? Is there anything about your experience as a donor or volunteer that would affect your ability to be fair and impartial in this case?

20. In this case, the government alleges that the defendant misappropriated funds that were intended for a memorial to local police officers killed in the line of duty. Understanding that these are merely allegations, do you have any opinions about law enforcement that could affect your ability to be fair and impartial in this case?

21. One of the alleged victims in this case is a labor union, and some witnesses who testify may be affiliated with labor unions. Do you have any opinions about labor unions which could affect your ability to judge their testimony fairly and impartially?

22. Some of the witnesses and alleged victims in this case are public officials, including Governor Joe Lombardo and City Councilwoman Victoria Seaman. Do you have any opinions about these public officials which could affect your ability to judge their testimony fairly and impartially?

23. One of the alleged victims and witnesses in this case is an attorney who lobbies public officials on behalf of clients. Do you have any opinions about lobbying or lobbyists which could affect your ability to judge their testimony fairly and impartially?

24. Some of the witnesses and alleged victims in this case are entrepreneurs who work or have worked in the legal marijuana industry. Do you have any opinions about marijuana or the marijuana industry that could affect your ability to judge their testimony fairly and impartially?

25. At the conclusion of the trial, the Court will instruct on the law that you should apply to the facts of this case. Is there anything about your beliefs or opinions about federal law that might prevent you from following the law as the Court instructs you?

26. 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?

27. Is there anyone here who, because of a religious, philosophical, moral, ethical, emotional, or any other reason, feels like you cannot sit in judgement of another person regardless of the evidence presented?

28. Does anyone have any personal experiences, feelings, or concerns that you think should be brought to the Court's attention regarding your service on this case? If so, what are those thoughts or feelings?

29. Is there anything else that the parties should know about you to ensure that both sides receive a fair and impartial jury?

DATED: September 9, 2024

Respectfully submitted,

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