

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 09-00362-01-CR-W-NKL
)	
JAMES J. STROBBE,)	
)	
Defendant.)	

GOVERNMENT'S REQUESTED VOIR DIRE QUESTIONS

Comes now the United States of America, by and through its undersigned counsel, and respectfully requests that the following questions be propounded to the prospective jurors:

I. GENERAL QUESTIONS

1. From each prospective juror please obtain the following information: Extent of education; general area of residence; marital status; children (number and ages); place of employment and position; prior employment; military service; spouse's employment and prior employment.

2. Is any member of the jury panel personally acquainted with the defendant in this case: or with any member of the defendant's family, or with any of his friends or associates? [If the answer is yes, please explore the nature and extent of that relationship outside the presence of the other members of the panel.]

3. Is any member of the jury panel, or any member of his or her family, related to, a friend of, or acquainted with any of the counsel in this case: Charles Ambrose, representing the United States, or John Osgood, representing the defendant. [If the answer is yes, please explore the nature and extent of that relationship.]

4. Has any member of the jury panel, or any relative of a panel member, ever been a party to a legal action or dispute with the United States, or any of its officers, agents or employees? [If the answer is yes, please explore the nature and extent of that legal action or dispute.]

5. Has any member of the jury panel, or any relative or close friend of a member of the panel, ever been a victim of, accused of, or convicted of a crime (other than a minor traffic violation)? [If the answer is yes, please explore the nature and extent of the matter outside the presence of the other members of the panel.]

6. Has any member of the jury panel, or any relative or close friend of a member of the panel, ever been the subject of a criminal investigation by any federal, state or local investigative agency? [If the answer is yes, please explore the nature and extent of the matter outside the presence of the other members of the panel.]

7. Has any member of the jury panel, or any relative or close friend of a member of the panel, ever participated as a witness in any criminal case? [If the answer is yes, please explore the nature of this participation, including an inquiry into which party called the panel member as a witness, and whether the testimony was substantive evidence or character evidence.]

8. Has any prospective juror previously served as a juror in a criminal trial? [If the answer is yes, please explore the nature of the case, whether a verdict was reached, and what that verdict was.]

9. Has any member of the jury panel previously served as a juror in a civil case? [If the answer is yes, please explore the nature of the case, whether a verdict was reached, and what that verdict was.]

10. Does any prospective juror have any personal knowledge of the charges brought against the defendant in this case? [If the answer is yes, please explore the nature and extent of the matter outside the presence of the other members of the panel.]

11. Has any member of the panel read or heard anything concerning this case either in the newspaper, on radio, television or from any other news media? [If the answer to this question is yes, please explore the nature of such knowledge, and whether the panel member would be able to set aside any information he or she might have derived from such source.]

12. Has any member of the panel, or any member of his or her family, ever attended law school or received any type of legal training?

13. Is any member of the panel or any member of his or her family currently employed by an attorney's office or any law enforcement agency?

II. QUESTIONS REGARDING PROSPECTIVE JURORS' ABILITY TO FOLLOW THE LAW

1. Does any prospective juror have any religious or moral beliefs which would prevent him or her from judging their fellow man?

2. Can all members of the panel render a verdict without allowing sympathy or prejudice to influence their decisions in any way?

3. Can all prospective jurors render a verdict based only on the evidence and the law as instructed by the court?

4. Does any member of the panel favor the legalization of any illegal drug or controlled substance?

5. Does any member of the panel know of any reason why he or she should not hear this case?

6. Would any member of the panel automatically reject the testimony of a witness simply because that witness had participated in criminal activity and reached a plea agreement with, or received sentencing consideration from, the government?

7. Does any member of the panel feel that certain groups are being unfairly targeted by the government for criminal prosecution?

III. CASE SPECIFIC QUESTIONS

This case involves charges that the defendant conspired with others to distribute quantities of illegal drugs; it is therefore necessary to ask whether any member of the panel, or any family member or close friend of a panel member, has ever had any problem involving drugs. [If the answer is yes, please explore the nature and extent of the matter outside the hearing of the other prospective jurors.]

Respectfully submitted,

Beth Phillips
United States Attorney

By */s/ Charles E. Ambrose, Jr.*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on April 2, 2010, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

John Osgood
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/s/ Charles E. Ambrose, Jr.

Charles E. Ambrose, Jr.
Assistant United States Attorney