# IN THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF ILLINOIS AT PEORIA

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
<b>v.</b>	)	Criminal No. 06-10019
	)	
ROBERT LAWRENCE,	)	
	)	
Defendant.	)	

## **GOVERNMENT'S PROPOSED VOIR DIRE**

Now comes the United States of America, by Rodger A. Heaton, United States

Attorney for the Central District of Illinois, K. Tate Chambers, Assistant United States

Attorney for the Central District of Illinois, and hereby submits the following proposed

voir dire pursuant to Rule 24(a) of the Federal rules of Criminal Procedure, and requests

the Court to inquire as follows:

## A. **Preliminary Matters**

- 1. The attorneys cannot talk to you during recess. Please do not think they are being unfriendly.
- 2. The attorneys will be exercising peremptory challenges. They are not meant to be offensive. Please do not hold it against the attorneys.
- 3. There will be objections by the attorneys. They are a part of their job.

  Please do not hold it against the attorneys.

#### B. **Personal Matters**

- 1. Have you ever taken any legal courses or had any legal training?
  - a. More specifically, have you ever taken any legal courses in, had any training in, or otherwise studied, the area of tax law?
  - b. If yes to 1 or 1a please explain.

#### C. Internal Revenue Service

- 1. Have any of you, your relatives or your close friends ever been "audited" by the Internal Revenue Service?
- 2. Have any of you, your relatives or your close friends ever been assessed a penalty for failure to file or failure to pay taxes?
- 3. Have any of you, your relatives or your close friends ever been the subject of an Internal Revenue Service or other United States government investigation?
- 4. (To jurors who responded affirmatively to questions 1, 2 or 3):
  - a. Was the matter resolved to your satisfaction?
  - b. Were you treated fairly and courteously by United States officials?
  - c. Do you hold any grudges against the United States or against United States officials?

(If "no" to a. or b. or "yes" to c.)

- 1. Would your feelings prevent you from listening to the United States' cases fairly and impartially and reaching a verdict based on the evidence?
- 2. Could you give the United States a fair trial in this case just

- as you would give the defendant a fair trial?
- 3. Is there anybody who could not give both the United States and the defendant a fair trial and render a verdict based only on the evidence in this matter?
- 5. Have any of you, your relatives or your close friends had any other experiences with the Internal Revenue Service which might influence you in a case which involved this agency?
  If yes, please explain.
- 6. Have any of you or your relatives ever been a party to any legal action or proceeding involving the United States, its officers, agents or employees, or the Internal Revenue Service?
- 7. Do any of you feel that violations of Federal Income Tax laws should not be investigated or prosecuted as crimes by the United States?
- 8. Is there anybody who holds strong personal or philosophical feelings about the tax system of the United States?

  If yes, what are your feelings?
- 9. Has anyone ever attended a meeting, read a book, or viewed a videotape, in which it was suggested that you do not have to file income tax returns or pay income taxes, including meetings of, books written by, videotapes produced by:
  - a. The Joy Foundation
  - b. We the People

- c. Patriots
- d. The Sheriff's Posse Commitatus
- e. The Pilot Connection
- f. Irwin Schiff
- g. Joe Bannister
- h. Sherry Peel Jackson
- I. John Turner
- j. Lowell H. Becraft, Jr.
- k. Charlie Baell
- 1. Liberty Lobby
- m. The Lawmen
- n. Charles Conces
- o. Pembina Tribal Nation (Little Shell Band)
- p. The Joy Foundation
- 10. If yes to any name in question #9:
  - a. What do you know about any of the individuals or groups to which an affirmative answer was given?
  - b. How did you come to learn about that person or group?
  - c. Do you agree or disagree with their philosophy?
  - d. When and where did you attend the meeting?
  - e. What book did you read or what videotape did you view?

- f. Who were the speakers or authors?
- g. What if any actions did you take with regard to your income tax obligations as a result of the meeting, book or videotape?
- 11. Is anyone otherwise familiar with any of the above groups or individuals?
- 12. Has anyone ever discussed with you their belief that you do not have to file income tax returns or pay income taxes?

Respectfully Submitted,

UNITED STATES OF AMERICA

RODGER A. HEATON UNITED STATES ATTORNEY

By: s/: K. Tate Chambers
K. TATE CHAMBERS
Assistant United States Attorney
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211 Fulton Street
Peoria, IL 61602

# **CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2006, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Oscar A. Stilley OSCAR STILLEY ATTORNEY AT LAW 2120 North B St Ft Smith, AR 72901

> s/: Kim Ritthaler Legal Assistant