

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ILLINOIS
PEORIA DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CRIMINAL ACTION NO. 06-10019
)	
ROBERT LAWRENCE,)	
Defendant.)	

REQUESTED VOIR DIRE

Comes now Defendant and for his requested voir dire proposes and requests that the following questions be asked:

1. How many of you think that a person charged by an indictment of a grand jury is presumably guilty simply because of the fact he has been indicted?
2. Since the Grand Jury Indictment is returned without any presentation of any defense by the Defendant in this case, how many of you know that you will be the first and only trier of facts with regard to the Defendant's guilt or innocence?
3. Do any of you disagree with the proposition that Government and a Grand Jury are not always correct regarding the return of an indictment?
4. Because you live in a relatively small city, do any of you think that returning a not guilty verdict against the Government's case could result in the IRS selecting you for an audit in the future?

5. In some way, each of you are either investors in the United States, through the Social Security System, or recipients of some benefit that is derived from tax revenues paid into the United States. Would the fact you are receiving or are to receive any benefit now or in the future from the United States Government, in any way, persuade you to favor the Government's case herein?

6. Would the fact that you felt obligated to file tax returns, while Defendant did not, cause you to believe that if you have to file, Bob Lawrence has to file, and therefore conviction is appropriate?

7. Do any of you believe that everyone owes taxes in general regardless of what the law actually says about how certain transactions are treated?

8. What is your understanding of the meaning of the term "beyond any reasonable doubt?"

9. After you have heard the evidence in this case, and once you have applied that evidence to the laws, as given to you by the Court, if you decide that the Defendant is not guilty, will you be willing to stand your ground as to your decision, or are you someone that would change their decision either under pressure from other jurors or for the purpose of convenience like so you can go home earlier? By this I do not suggest that you should not change your vote if you are honestly persuaded that the facts, as applied to the jury instructions, would require a different vote than the one that you originally planned.

10. If you began deliberating on Thursday or Friday of this week and you saw that 5:00 pm was fast approaching on Friday, and you were standing for the decision Defendant was not guilty while others among you were either undecided or stood against your decision, would you be willing to be the sole reason the jury had to come back on Saturday or Monday, to continue to

deliberate? Or, would you decide that since 11 have voted one way and you have voted another that you must be wrong and change your decision?

11. Do any of you disagree with the jury system in which you are here participating?
12. Will any of you, if selected as a juror, hold that inconvenience against the Defendant in this case because he chose to dispute the government's accusations?
13. Do any of you think that an indictment is as easy to get as a ham sandwich?
14. Do any of you think that just because a member of the executive branch of the Office of President says that something is so that it is necessarily so?
15. Do any of you have any problem falling asleep if you sit for long periods of time?
16. Do any of you have any problem with staying alert for a period of time after you have eaten something?
17. What time are you used to getting up in the morning?
18. How many of you are coffee drinkers in the morning?

By: /s/ Oscar Stilley
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CERTIFICATE OF SERVICE

I, Oscar A. Stilley, certify by my signature above that a copy of the foregoing was delivered by CM/ECF this May 10, 2006 to: Gerard A. Brost, Assistant US Attorney, Suite 400, 211 Fulton Street, Peoria, IL 61602.