

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
No. 08-CR-364 (RHK/AJB)

United States of America,

Plaintiff,

v.

**DEFENDANT'S PROPOSED GENERAL
VOIR DIRE QUESTIONS**

Thomas Joseph Petters,

Defendant.

Defendant Thomas Joseph Petters, by and through his undersigned attorneys, hereby submits proposed general *voir dire* questions.

1. Are you acquainted with or do you know anyone in the U.S. Attorney's Office? Do you know John Docherty, John Marti, Timothy Rank, or Joseph Dixon? Do you know the defense lawyers, Jon Hopeman or Eric Riensche or their law firm, Felhaber, Larson, Fenlon & Vogt or Paul Engh?
2. Do you know anyone who works for the FBI or IRS? Do you know Eileen Rice of the FBI? Do you know Brian Kinney of the FBI? Do you know Kathy Klug of the IRS?
3. Have any of your responses to the questions on the jury questionnaire changed since you completed the questionnaire?
4. Have you had any contact with any federal agency that investigates alleged crimes?
5. Do you know any of the witnesses in this case?

6. There may be some law enforcement officials who testify in this case. Would you give their testimony more credibility than that of other witnesses?
7. Do you use Twitter, MySpace, Facebook, YouTube, or other such social networking sites, or any weblog sites?
8. Have you ever maintained an internet blog? If so, what is the address?
9. The jury will be told not to watch or listen to or read news media about the case until the trial is over, and not to talk with anyone about the case, not even to one another, not even to your relatives or close friends, until it retires to deliberate. Would you find it difficult to follow such an instruction for any reason?
10. Do you know any of the alleged victims in this case? (The Government should provide a list of alleged victims.)
11. Do you have knowledge of Petters Company, Inc., Petters Group Worldwide, Polaroid, Fingerhut, Sun Country Airlines, or any other companies associated with Mr. Petters?
12. Describe specifically what you know, if anything, about Mr. Petters or any of the companies affiliated with him.
13. Do you consider yourself or any member of your family or any of your friends a victim of the crimes alleged, or do you have empathy for those who say they have been the victim of a crime?
14. Do you have any thoughts or opinions about business executives and salespeople, and business executives and salespeople charged with offenses?

15. Do you have any thoughts or opinions about corporate bonuses and compensation?
16. Do you have any thoughts or opinions about how much compensation is too much?
17. Do you have any thoughts or opinions about the diverting, liquidation, and discount businesses?
18. Do you have any thoughts or opinions about interest rates and what rate is too high?
19. Do you have any thoughts or opinions about the federal witness protection program (WITSEC), informants, or incentives to government witnesses?
20. Do you have any thoughts or opinions about hedge funds and lack of regulation of the same?
21. Do you have any thoughts or opinions about lawyers, auditors and accountants?
22. Have you ever had a bad experience with a lawyer? If so, describe the experience.
23. Do you have any thoughts or opinions about rich people or people who live an “extravagant lifestyle?”
24. Do you have any thoughts or opinions about profanity, swearing, and blue language?
25. Do you have any thoughts or opinions about casino gambling?

26. Do you have any thoughts or opinions about marriage, divorce, and children born to unmarried persons?
27. Have you or any member of your family or any of your friends experienced the death of a child?
28. Do you have any thoughts or opinions about drug dependency and excessive alcohol consumption?
29. Do you have any thoughts or opinions about the Roman Catholic Church and practicing Roman Catholics?
30. Do you have any thoughts or opinions about charitable giving?
31. Do you have any thoughts or opinions about the criminal justice system, proof beyond a reasonable doubt and presumption of innocence? Do you believe in the ideals?

Dated: October 5, 2009

s/ Jon M. Hopeman

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