

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
) Cr. No. 05 CR 394 (RBW)
)
)
I. LEWIS LIBBY)

GOVERNMENT’S PROPOSED VOIR DIRE QUESTIONS

The government respectfully submits the following voir dire questions for use in the trial of this case.

Demographic Information

1. How old are you?
2. What is the name of the neighborhood in which you live (for example, Shaw, Adams, Morgan, Georgetown)? How long have you lived at your present address? Have you lived anywhere else in the past ten years and, if so, where, and for how long? Where did you grow up?

Educational Background

3. What is the highest level of schooling you have received? If you attended college, trade or vocational school after high school, where did you attend? What were your major areas of study, and what degree(s) or certificate(s) did you earn?

Family History

4. Are you currently single, married, divorced, separated, or widowed?
5. Do you have any children, stepchildren, or grandchildren? Do any of them live with you? Please briefly tell us as to each child, stepchild, and grandchild, how old they are, their gender, their current employment or occupation, if any, and whether they live with you.

Employment/ Activities

6. Are you currently employed? If so, please state the name of your employer, how long you have worked for this employer, your position or job title, your main duties, whether you work full or part-time, and whether you supervise others and, if so, how many. If you are not currently employed, please state whether you are: a homemaker, a student, disabled and unable to work, unemployed or laid off, retired, own your own business, or are self-employed.

7. Please provide the following information about your previous three jobs, beginning with the most recent: the name of your employer, your position or job title, the approximate dates of your employment, and your reason for leaving.

8. If you are now or have ever been married, please describe the employment or occupation of your present or former spouse.

9. If any of your adult children are married, please describe the employment or occupation of their spouse(s).

10. Please describe the most recent employment or occupation of any other adults who live in your household.

11. What are your leisure-time activities or interests?

12. Do you hold any office or title in any civic, social, religious, political, professional or trade organizations?

Experience with Law and the Courts

13. Have you or any immediate family member (spouse, parent, child or sibling) or any close friend ever attended law school, taken paralegal course work, or received any other type of training in law, law enforcement, or criminal justice? If YES, please explain.

14. Are you and attorney, or do you have any immediate family members (spouse, parent, child or sibling) or any close friends who are attorneys? If YES, please state each attorney's name, type of practice, and relationship to you:

15. Have you or any immediate family member (spouse, parent, child or sibling) or any close friend ever been employed by, or made any application for employment with, any local, state or federal law enforcement agency or any prosecutor's office? If YES, please provide the name of each person, his or her relationship to you, and the agency or office for which he or she work or worked.

16. Have you or any immediate family member (spouse, parent, child or sibling) or any close friend ever been employed by, or made an application for employment with, any organization or firm involved in criminal defense work, or ? If YES, please provide the name of each person, his or her relationship to you, and the agency or office for which he or she work or worked.

17. Have you or any immediate family member (spouse, parent, child or sibling) or any close friend ever been employed by, or made an application for employment with, any organization or firm that provides investigation or other services to prosecutors or defense attorneys, or people charged with crimes? If YES, please provide the name of each person, his or her relationship to you, and the agency or office for which he or she work or worked.

18. Do you feel that you might give more or less weight to the testimony of law enforcement agents than to that of other witnesses? If YES, please explain.

19. Have you or any immediate family member (spouse, parent, child or sibling) or any close friend ever been the victim of, or witness to, any kind of crime, whether it was reported to law enforcement authorities or not? If YES, please state whether the person was a victim or a witness,

the relationship of the person to you, the type of crime involved, whether the crime was reported to the police, and whether anyone was ever caught or punished. Did any of these experiences, or anything you heard about them, leave you with a positive or negative impression of judges, the legal system, lawyers or law enforcement officers? If so, please explain.

20. Have you, or any immediate family member (spouse, parent, child, sibling) or any close friend been arrested, accused of, or charged with any crime, other than a traffic ticket, including any charge or accusation you believe was dropped or expunged? If YES, please state the person who was arrested, accused or charged, the relationship of that person to you, the type of crime involved, the approximate date of the arrest, accusation or charge, and the outcome of the case. Did any of these experiences, or anything you heard about them, leave you with a positive or negative impression of judges, the legal system, lawyers or law enforcement officers? If so, please explain.

21. Have you ever been a party to a lawsuit? If YES, please state the approximate date of the suit, the type of case, whether the case went to trial, and the outcome of the case. Did any of these experiences leave you with a positive or negative impression of judges, the legal system, lawyers or law enforcement officers? If so, please explain.

22. Have you or any immediate family member (spouse, parent, child, sibling) or any close friend testified in court in any type of proceeding? If YES, please state the person who testified, the relationship of that person to you, whether the person was a victim, witness or party, the type of case, and the approximate date of the testimony. Did any of the above experiences, or anything you heard about them, leave you with a positive or negative impression of judges, the legal system, lawyers or law enforcement officers? If so, please explain.

23. Have you ever served on a jury? If YES, please state the approximate date of your service, the type of case, and whether a verdict was reached. Have you ever served as a jury foreperson? If YES, please indicate the case in which you so served.

24. Have you ever served on a grand jury? If YES, please state where, when and for how long you served, and whether you served as the foreperson.

25. Did any of your experiences as a juror or grand juror leave you with a positive, negative, or neutral impression of judges, the legal system, lawyers or law enforcement officers? If YES, please explain.

26. Is there anything about your previous experience as a juror that would make you want to serve, or want not to serve, as a juror again? Please explain.

Experiences with Other Government Departments and Agencies

27. Have you, or any member of your immediate family (spouse, parent, child, sibling), or any close friend ever been employed by, or applied for employment with, any agency or department of the United States government? If YES, please provide the name of each person, his or her relationship to you, and the agency or office for which he or she work or worked.

28. Have you, or any member of your immediate family (spouse, parent, child, sibling), or any close friend ever had any legal action or dispute with the United States or any of its agencies, or any officer, agent or employee of the United States? If YES, please describe your interest and the nature of the action or dispute.

29. Have you or a family member or close friend ever had an experience involving the FBI, police, or any other law enforcement agency, including being interviewed by or making a report

to a law enforcement officer? If YES, please explain the approximate time and nature of your experience.

News Media

30. Do you subscribe to or read any newspapers or magazines? If YES, which newspaper(s) and/or magazine(s) do you subscribe to or read on a regular basis?

31. From what source or sources do you receive news on a regular basis (TV, radio, newspapers, news magazines, newsletters, the internet, conversations with others)?

32. If you sit as juror in this case, I will instruct you to avoid exposure to any media coverage or discussion about the case other than the evidence and argument that you hear in court. Would you find it difficult to obey such an instruction?

33. Have you, or any member of your immediate family (spouse, parent, child, sibling), or any close friend ever worked as a journalist, or been employed by a newspaper, magazine, or a television or radio station? If YES, please explain.

Questions Related to this Case

34. In the indictment, Mr. Libby is charged with obstruction of justice, perjury, and making false statements to investigators and a grand jury in connection with an investigation concerning possible unlawful disclosures to reporters of classified information regarding the employment of Valerie Plame Wilson, the wife of former Ambassador Joseph Wilson. The defendant denies that he committed any of the charged offenses, and he is presumed innocent of the charges against him. Is there anything about the nature of the charges in this case that would affect your ability to be fair to both the defendant and the government, or to fairly evaluate whether or not

the government has proven the guilt of the defendant beyond a reasonable doubt? If YES, please explain.

35. Mr. Libby served as Chief of Staff and National Security Adviser to the Vice President Richard Cheney. Is there anything about that fact that would make it difficult for you to be fair to both the government and the defendant, or to fairly evaluate whether or not the government has proven the guilty of the defendant beyond a reasonable doubt? If YES, please explain.

36. Have you read, seen or heard any news or editorial coverage about this case? If YES, have you followed the case closely? Whether you received a little or a lot of information about this case, would you be able to put everything you have seen, heard, or read about this case aside and focus only on the evidence presented in court in reaching a verdict?

37. Do you know or have any connection with me or any member of my staff? If YES, please explain.

38. Do you know or have any connection with defendant I. Lewis "Scooter" Libby or any members of his family? If YES, please explain.

39. Do you know or have any connection with any of the following lawyers for the defense or any members of their staff? If YES, please explain.

William H. Jeffress	Joseph A. Tate	James Lewis Brochin
Theodore V. Wells	K.C. Maxwell	Alexandra M. Walsh
John D. Cline	Alex Joseph Bourelli	

40. Do you know or have any connection with any of the following lawyers for the United States or any members of their staff?

Patrick J. Fitzgerald Ronald R. Roos Peter R. Zeidenberg
Debra Riggs Bonamici Kathleen M. Kedian

41. Do you know or have any connection with any of the following special agents of the Federal Bureau of Investigation, who worked on this case? If YES, please explain.

Deborah S. Bond John C. (“Jack”) Eckenrode Kirk D. Armfield

42. Do you know or do you have any connection with any of the following journalists, who may testify as witnesses in the trial? If YES, please explain.

Judith Miller Matthew Cooper Tim Russert

43. Do you know or do you have any connection with any of the following persons, who may testify as witnesses in the trial? If YES, please explain.

[Supplement with witness list agreed to by both parties as of the date of jury selection]

Questions Related to Your Ability to Serve as Juror

44. Do you have any difficulty reading, speaking or understanding the written or spoken English language? If YES, please explain.

45. Do you have any medical condition or physical problem, including a problem with your hearing or eyesight, that might affect your ability to or listen to witnesses, view exhibits, or otherwise affect your service as a juror? If YES, please explain.

46. Do you take any medications that affect your thinking, attention, concentration or that might affect your service as a juror? If YES, please explain.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 13th day of November, 2006, I caused true and correct copies of the foregoing to be served on the following parties by electronic mail:

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By: _____/s/
Debra Riggs Bonamici
Deputy Special Counsel

