



familiarity with that area make it difficult for you to fairly and impartially serve as a juror in this matter?

4. Do you know counsel for the Government or counsel for the defendant? If yes, please explain.

5. Are you acquainted with any of the government's witnesses, who may include Philadelphia Police Officers Marlana Caprara and Patrick Cavalieri. Philadelphia Police David Budka, Philadelphia Police Chemist Tanweer Ali and Special Agent James Uvena of the Bureau of Alcohol, Tobacco and Firearms? If yes, please explain.

6. Do you have opinions about the way in which law enforcement agents treat certain members of the community or about the way in which the criminal justice system treats certain members of the community such that you would not be able to decide this case based solely upon the evidence presented at trial?

7. Do you have any negative feelings toward the Bureau of Alcohol, Tobacco, and Firearms, the Philadelphia Police Department or any law enforcement agency which would affect your ability to render a fair and impartial verdict in this case?

8. Have you ever had, or do you now have, or do you presently anticipate having, any case or dispute with or claim against the United States Government, including the Internal Revenue Service?

9. Have you had any dealing whatsoever with the United States Government in connection with which you feel that

the government did not give you fair treatment? If so, please explain.

10. Have you ever been a juror before? If yes, where, when, and in what type of case (civil or criminal)? If yes, did you reach a verdict?

11. Have you or any member of your immediate family, close friends, or relatives ever been the victim of a crime or participated in a criminal case as a complainant, witness for the Government, or the Commonwealth, or in some other capacity? If yes, please explain.

12. Have you or any member of your immediate family ever participated in a criminal case as a defendant, witness for the defense, or in some other capacity? If yes, please explain.

13. Do you believe that you or any member of your immediate family, close friends or relatives has ever been unfairly accused or convicted of a crime? If so, please explain.

14. Do you object to law enforcement agents taking on "undercover roles" in order to investigate crimes?

Since this case involves alleged unlawful firearm possession, I will ask you the following questions:

15. Do you belong to the National Rifle Association or any other organization which takes a position regarding the legality of firearms? If so, what organization? What is the organization's position with respect to the legality of firearms?

16. Do you own or possess any type of firearm? If so, for what purpose?

17. Do you belong to a gun club or shooting range?

18. Do you believe that all people should be permitted by law to own or possess firearms?

19. Do you believe that people should be allowed to carry a gun without obtaining a license or a permit for the gun?

20. Do you believe that any law which forbids or restricts the possession of a firearm is unconstitutional?

Since this case also involves an alleged narcotics offense, I will ask you the following questions:

21. Have you or any members of your family or any close friends ever had a problem with substance abuse? You may inform the Court at sidebar rather than in open court if you wish.

22. Are you or any members of your family employed in positions which require frequent contact with narcotic substance abusers? If so, please explain.

23. Do you have any preconceived opinions about the narcotics laws that would make you unable to decide this case on the evidence presented and the law as stated by the court? For example, do you believe that the federal narcotics laws are unconstitutional?

24. Do you believe that the use, possession or distribution of marijuana, or any other drug that is currently illegal, should be legalized? If yes, please explain.

25. Do you believe that the distribution of marijuana is not serious enough to constitute a federal crime? If yes, please explain.

26. Do you feel that you could not judge another human being for a criminal act, whether on religious, moral, personal or any other ground?

27. If you were representing the government or the defendant in this case, is there any reason why you would not be content to have the case decided by someone in your frame of mind?

Respectfully submitted,

MICHAEL R. STILES  
United States Attorney

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J. HUNTLEY PALMER, JR.  
Chief, Firearms  
Assistant United States Attorney

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FLOYD J. MILLER  
Assistant United States Attorney

Dated: July 20, 1999

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20 day of July 1999, a true and correct copy of the foregoing Government's Requested Voir Dire Questions was sent by first-class mail, postage prepaid, to:

Joseph C. Santaguida, Esquire  
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Floyd J. Miller  
Assistant United States Attorney