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9 Attorneys for Plaintiff
 10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 ALEXANDRIA DEMETRIUS AUGUSTINE,

17 Defendant.

No. CR 2:25-678-KLS

18 GOVERNMENT'S PROPOSED VOIR
DIRE

Trial Date: October 7, 2025
 Trial Time: 9:00 a.m.
 Location: Courtroom of the
 Hon. Karen L.
 Stevenson

19
 20 Plaintiff United States of America, by and through its counsel
 21 of record, the Acting United States Attorney for the Central District
 22 of California and Assistant United States Attorneys Patrick D. Kibbe
 23 and Christopher R. Jones, hereby requests the Court ask the attached
 24 proposed voir dire questions during jury selection.

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1 The government respectfully requests leave to supplement its
2 proposed voir dire questions, if necessary.

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4 Dated: October 1, 2025

Respectfully submitted,

5 BILAL A. ESSAYLI
Acting United States Attorney

6 JOSEPH T. MCNALLY
7 Assistant United States Attorney
Acting Chief, Criminal Division

8
9 /s/

10 PATRICK D. KIBBE
CHRISTOPHER R. JONES
Assistant United States Attorneys

11
12 Attorneys for Plaintiff
UNITED STATES OF AMERICA

1 **I. CHARGED OFFENSE**

2 1. The defendant is charged with assaulting a federal officer,
3 namely, by throwing an umbrella at him. Is there anything about the
4 charges in this case that make you reluctant to serve as a juror?

5 2. Is there anyone who thinks that throwing an umbrella at
6 someone cannot constitute an assault?

7 3. Is there anyone who believes that assault on a federal
8 officer should not be a crime?

9 4. Have you or anyone close to you ever been a victim of an
10 assault? Please provide details about what happened. (You may ask to
11 approach the bench to answer this question if you prefer.)

12 5. Do you have any feelings about laws relating to assault
13 that would affect your ability to be an impartial juror in this case?

14 **II. EXPERIENCE WITH LAW ENFORCEMENT/GOVERNMENT**

15 6. Do you know any individuals employed by the United States
16 Federal Protective Service - sometimes referred to as FPS -, the
17 Department of Homeland Security, or any other law enforcement agency?

18 7. Do you have any strong feelings about the United States
19 Federal Protective Service - sometimes referred to as FPS -, the
20 Department of Homeland Security, or the federal government that would
21 prevent you from fairly assessing the credibility of these witnesses?

22 8. Have you, or any of your close friends or relatives, had
23 any recent or notable experiences, positive or negative, involving
24 the police or any other member of law enforcement, including the
25 United States Federal Protective Service - sometimes referred to as
26 FPS -, the Department of Homeland Security, or the federal
27 government?

28 a. If so, please describe the circumstances.

1 b. Which law enforcement agency was involved?

2 c. How did it make you feel?

3 d. Do you believe that law enforcement acted
4 professionally and fairly?

5 e. Would you be able to put those feelings and
6 experiences aside, be they positive or negative, and render a verdict
7 based on the evidence before you?

8 9. Have you, a relative, or close friend ever been convicted
9 of a crime?¹

10 10. Have you, a relative, or close friend ever been sentenced
11 to or served time in jail or prison?

12 a. If so, what were the circumstances?

13 11. Have you, a relative, or close friend ever been arrested,
14 even if the case never went to court?

15 a. If so, what were the circumstances?

16 b. How did the process make you feel?

17 c. Would you be able to put those feelings aside, be they
18 positive or negative, and render a verdict based on the evidence
19 before you?

20 12. Have you, a relative, or close friend ever filed a lawsuit
21 or complaint concerning the conduct of a law enforcement officer?

22 13. Have you, a relative, or close friend, ever been a victim
23 of a crime?

24 a. If so, were you satisfied or dissatisfied with law
25

26 ¹ If any potential juror answers a question related to prior
27 criminal activity or being the victim or knowing the victim of a
28 crime in the affirmative, the government respectfully requests -
unless the juror consents to public questioning - that the Court
question the potential juror regarding the circumstances in private
or at the bench, so as to avoid embarrassment to the potential juror.

1 enforcement's response and the judicial system?

2 b. Why or why not?

3 14. Some of the witnesses in this case may be law enforcement
4 officers. Would any of you be more or less likely to believe the
5 testimony of a law enforcement officer just because that witness was
6 a law enforcement officer?

7 15. Do you have any feelings about the level of force a law
8 enforcement officer may or should use while on duty?

9 a. If a law enforcement officer used force to accomplish
10 their duties, would that impact your ability to judge their
11 credibility, evaluate the evidence, or render a fair and impartial
12 verdict in an assault on a law enforcement officer trial?

13 16. Do you have any feelings regarding the criminal justice
14 system generally that might affect your ability to consider the
15 evidence in this case fairly and impartially and to base your verdict
16 only on the evidence presented in this case?

17 17. Do you know of any reasons why you would be biased or
18 prejudiced for or against the Government or the defense in this case?

19 **III. EXPERIENCE WITH IMMIGRATION AND CURRENT EVENTS**

20 18. You will hear testimony regarding events that have occurred
21 at recent protests focused on immigration enforcement in Los Angeles.
22 Has anyone here read or seen any media coverage - be it traditional
23 media or social media - about these protests?

24 a. If so, what have you seen?

25 b. How did seeing that make you feel?

26 c. Would you be able to render a fair and impartial
27 verdict in favor of either the government or the defendant based on
28 what you have seen or read?

1 d. Would you be able to evaluate the evidence and judge a
2 witness's credibility - including law enforcement agents on duty at
3 the protests - to render a fair and impartial verdict?

4 19. Do you have any opinion, whether positive or negative,
5 about law enforcement's response to immigration policy in the United
6 States and/or in Los Angeles?

7 a. Would that opinion impact your ability to judge the
8 credibility of government or defense witnesses, evaluate the
9 evidence, follow the Court's instructions, and/or render a fair and
10 impartial verdict?

11 20. Has anyone been involved in an organization or participated
12 in a protest - be it an active or passive participant - designed to
13 protest how immigration enforcement has been handled by the federal
14 and/or local governments?

15 a. If so, please describe what protests you have
16 participated in and your role in the protests.

17 b. Was law enforcement present during the protest/s? If
18 so, how did that make you feel?

19 c. Did you witness any encounters - be it peaceful,
20 violent, or in-between, between protestors and law enforcement? If
21 so, how did that make you feel?

22 i. Do you have any thoughts about how law
23 enforcement acted during encounters with protestors that would impact
24 your ability to listen to witnesses - including law enforcement
25 witnesses - and evaluate the evidence in this case?

26 ii. Do you have any thoughts about how law
27 enforcement acted during encounters with protestors that would impact
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1 your ability to render a fair and impartial verdict or follow the
2 Court's instructions?

3 **IV. ATTITUDE TOWARDS THE CRIMINAL JUSTICE SYSTEM AND INCARCERATION**

4 21. The law requires that you base your verdict on the facts as
5 you find them to be from the evidence. The law does not permit you to
6 consider any emotion, such as sympathy, prejudice, vengeance, fear,
7 or hostility. Will you be able to follow this instruction?

8 22. The law requires that you do not consider punishment,
9 prison time, or a possible sentence in your deliberations. Will you
10 be able to follow this instruction?

11 23. Do any of you have any strong feelings regarding law
12 enforcement or the criminal justice system generally? If you
13 responded "yes," please explain why. Would these feeling make it
14 difficult for you to be a fair and impartial juror in this case?

15 **V. ABILITY TO SIT AS JUROR**

16 24. Is there anything about the charge in this case that makes
17 you unwilling or reluctant to serve as a juror?

18 25. Is there anything that has not been discussed today that
19 you feel would affects your ability to sit as a fair and impartial
20 juror in this case?

21 26. Do any of you have any difficulty with hearing, seeing,
22 understanding the English language or have any medical problems or
23 other issues that could impair your ability to devote your full
24 attention to this trial?

25 27. Do you have any feelings or beliefs toward the law or the
26 criminal justice system in general that would make it difficult or
27 impossible for you to be fair and impartial to both sides in the
28 case?

1 28. If you are selected as a juror in this case, you will be
2 required to deliberate with eleven other jurors. Is there anything
3 that leads you to believe that you might be unable or unwilling to
4 engage in such discussions with others?

5 29. Would you refuse to follow the Court's instructions if you
6 disagreed with those instructions or thought that other rules would
7 be fairer?

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