

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 2:17-cr-22-2

v.

Hon. Robert J. Jonker
Chief United States District Judge

JESSICA LYNN TOBIAS,

Defendant.

_____ /

DEFENDANT'S PROPOSED SUPPLEMENTAL VOIR DIRE

NOW COMES the Defendant, Jessica Lynn Tobias, by and through her attorney Elizabeth A. LaCosse of the Office of the Federal Public Defender, and respectfully requests that this Honorable Court, in addition to those questions traditionally asked as a part of *voir dire*, consider also asking the following questions:

1. Have you heard the word snitch?
2. What does this word mean to you?
3. Would you have any issues assessing their testimony?
4. Would the fact that a person is getting a benefit for their testimony be an issue in assessing their testimony?

5. How about a drug user?
6. Would you have any issues assessing their testimony or credibility?

Respectfully submitted,

SHARON A. TUREK

Federal Public Defender

/s/ Elizabeth A. LaCosse
ELIZABETH A. LACOSSE
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Dated: February 2, 2018