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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF ARIZONA

10 United States of America,
11 Plaintiff,

No. CR-10-400-PHX-DGC

12 v.

JOINT VOIR DIRE QUESTIONS

13 Sue J. Taylor
14 aka Janice Sue Taylor,
15 Defendant.

16 I. United States' Proposed Voir Dire.

17 The United States, through undersigned counsel, respectfully submits the following
18 proposed voir dire questions. Defendant does not oppose these voir dire instructions.

19 1. Do you, a member of your family, or a close personal friend, have any disagreement
20 with the proposition that every person in this country is required to comply with the federal
21 income tax laws, as well as the other laws, whether or not personally agreeing with those laws?

22 2. Do you, a member of your family, or a close personal friend, belong to any
23 organization or group that believes or claims that the federal income tax system is voluntary or
24 need not be complied with for any reason whatsoever?

25 3. Some of the witnesses who may testify in this case are associated with the Internal
26 Revenue Service (IRS). Have you had any contact or experience with this agency, or any other
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1 government agency, which would make it difficult for you to render a fair and impartial verdict
2 in this matter?

3 4. Have you, a member of your family, or a close personal friend, ever been audited or
4 investigated, been the subject of collection efforts or sued, or had other extensive contact by the
5 Internal Revenue Service or a state Department of Revenue or other taxing authority? If so, is
6 there anything about that experience which would make it difficult for you to be fair and
7 impartial to the United States or the defendants in this case?

8 Due to privacy concerns and possible tainting of the jury panel, if a member of the jury
9 panel answers question 4 affirmatively, we respectfully ask that the juror be asked outside the
10 presence of the other jurors, the following:

11 (a). Who was it that had these prior dealings?

12 (b). What was the nature of the dealings?

13 (c). When did this occur?

14 (d). In your opinion, were you or the other person treated fairly by the IRS (or other
15 governmental taxing authority)?

16 (e). Is there anything about these prior dealings which causes you to have residual
17 feelings which might impact your ability to be a fair and impartial juror in this case?

18 5. Have you, your family members or close friends ever had a negative experience with
19 the United States government or any agency or subdivision of the United States government, or
20 any other government, which causes you to question your ability to sit as a fair and impartial
21 juror in this case?

22 6. This is a criminal case brought by the United States against the defendant, Sue J.
23 Taylor, aka Janice Sue Taylor. The charges are Income Tax Evasion and Willful Failure to File
24 a Tax Return. Do you hold any beliefs, feelings, biases or prejudices against these type of
25 prosecutions such that you doubt your ability to sit as a fair and impartial juror?

26 7. Do you have any opinion about the federal income tax system with causes you to
27 question your ability to sit as a fair and impartial juror?

1 7. Would the fact that you felt obligated to file tax returns, while Janice Sue Taylor
2 did not, cause you to believe that if you have to file, Janice Sue Taylor has to file, and conviction
3 is appropriate?

4 8. Do you believe that everyone owes income taxes on their labor regardless of what
5 the law actually says about how certain transactions are treated?

6 9. What is your understanding of the meaning of the term "beyond a reasonable
7 doubt?"

8 10. After you have heard the evidence in this case, and once you have applied that
9 evidence to the laws, as given to you by the Court, if you decide that Janice Sue Taylor is not
10 guilty, will you be willing to stand your ground as to your decision, or are you someone that
11 would change their decision either under pressure from other jurors or for the purpose of
12 convenience; for example, so you can go home earlier?

13 11. If you began deliberating on Thursday or Friday of this week and you saw that
14 5:00 p.m. was fast approaching on Friday, and you were standing for the decision that Janice Sue
15 Taylor was not guilty while others among you were either undecided or stood against your
16 decision, would you be willing to be the sole reason the jury had to come back on Saturday or
17 Monday, to continue to deliberate? Or would you decide that since 11 have voted one way and
18 you voted another that you must be wrong and change your decision?

19 12. Are you competent to read and understand the Internal Revenue Code and all the
20 requirements it imposes upon Janice Sue Taylor or any other individual?

21 13. Will you, if selected as a juror, hold prejudice against Janice sue Taylor in this case
22 because she chose to dispute the government's accusations?

23 14. Do you have a reading level of the 7th grade or above and are able to read and
24 understand Supreme Court cases, especially concerning Jurisdiction issues?

25 15. Do you know this court is bound to decide all matters of law in the favor of
26 innocence; and even if the court disagrees with Janice Sue Taylor's sincerely held beliefs must
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1 decide in her favor, as all differences must be settled in favor of the Citizen and against the
2 Government.

3 16. Have you studied the constitution and the three Organic Laws that made it
4 possible?

5 17. Have you studied any laws of nation? If so which particular ones?

6 18. Do you know the difference between Legislative, Executive and Judicial powers?
7 If so, could you explain the difference between them?

8 19. Do you know the difference between the term United States and United States of
9 America? If so, could you explain your understanding of the two different terms?

10 20. Do you have any problem falling asleep if you sit for long periods of time?

11 21. Do you have any problem with staying alert for a period of time after you have
12 eaten something?

13 22. Do you have a driver's license form the State of Arizona?

14 23. Do you have a social security number? If so do you believe you have to have one?

15 24. Do you pay income taxes, would you pay them if not under threat, fear and
16 coercion?

17 25. Have you received benefits such as unemployment insurance, food stamps,
18 welfare, student loans, or any other assistance from the government?

19 26. Is there anyone who is a member of a secret society such as the Masons or Eastern
20 Star?

21 27. Do you believe the Grand Jury is a separate independent branch of the
22 government?

23 28. Do you know the accused has to right to rely on the law as written and the
24 decisions of the Supreme Court as stated; and if her opinion and the U.S. Attorneys opinion are
25 different it means that the law imposes no duty upon her, and this court and you must acquit her?

26 29. Do you know the grand jury's purpose is to act as a "protector of citizens from
27 arbitrary and oppressive governmental action"?

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1 30. Would you have a problem acquitting Janice Sue Taylor if you thought the
2 government or the IRS would reprimand you for doing so, even though you believed she was
3 innocent?

4 31. Do you know that the grand jury is the equivalent of the fourth branch of
5 government and not to be tampered with by any other branch?

6 32. Do you believe the presumption of innocence lasts through the whole trial to the
7 very end?

8 33. Do you believe you have the right to ask the judge to explain any law in full detail
9 pertaining to this case at any time during the trial? Even if you are discouraged from so?

10 34. Would you be afraid to ask the judge any questions concerning the law?

11 35. Do you believe you are a United States citizen? If not, what kind of a citizenship
12 do you claim?

13 36. If you were told you had to live on Federal Territory, would you believe it? Why
14 not?

15 37. If you were told you had to live on Federal Territory in order to qualify as a juror,
16 would you believe it? Why would you believe or not believe it?

17 38. What time are you used to getting up in the morning?

18
19 Respectfully submitted this 11th day of March, 2011.

20 FRANK T. GALATI
21 United States Attorney
22 District of Arizona

23 *s/Frank T. Galati*

24 FRANK T. GALATI

25 *s/James R. Knapp*

26 JAMES R. KNAPP
27 Assistant U.S. Attorneys

1 Certificate of Service

2 I hereby certify that on 3/11/2011, I electronically transmitted the attached document to the
3 Clerk's Office using the CM/ECF system for filing and transmittal of a Notice of Electronic
Filing to the following CM/ECF registrants:

4 Susan Anderson

5 In addition, I mailed copies of the attached document to the following:

6 Janice Sue Taylor
3341 Arianna Ct.
7 Gilbert, AZ 85298

8 *s/ James Knapp*

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