

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 19-20693-CR-SEITZ

UNITED STATES OF AMERICA

v.

PETER SOTIS and  
EMILIE VOISSEM,

Defendants.

\_\_\_\_\_ /

JOINT PROPOSED JURY INSTRUCTIONS

In compliance with the Court's Trial Order, the parties are filing the following joint proposed jury instructions. The Defense, however, objects to the Government's Proposed Instruction Number 9 (concealment and threats) and Number 18, to the extent that the definition of willfulness is read more than once. It is requested that the parties be allowed to propose other instructions as may become appropriate based on the testimony and evidence at trial, and that the parties be informed, prior to closing arguments, which instructions the Court will accept. A proposed verdict form is also submitted for the Court's consideration.

Respectfully submitted,

JUAN ANTONIO GONZALEZ  
ACTING UNITED STATES ATTORNEY

By: s/ Michael Thakur  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 10, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Michael Thakur  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 19-20693-CR-SEITZ

UNITED STATES OF AMERICA

v.

PETER SOTIS and  
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Defendants.

\_\_\_\_\_ /

COURT'S INSTRUCTIONS TO THE JURY

Members of the Jury:

It is now my duty to instruct you on the rules of law that you must use in deciding this case. After I have completed these instructions, you will go to the jury room and begin your discussions- what we call your deliberations.

You must decide whether the Government has proved the specific facts necessary to find any of the Defendants guilty beyond a reasonable doubt.<sup>1</sup>

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<sup>1</sup> Eleventh Circuit Pattern Jury Instructions – Basic Instruction 1 (2020)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 1

Duty to Follow Instructions  
Presumption of Innocence

Your decision must be based only on the evidence presented here. You must not be influenced in any way by either sympathy for or prejudice against a Defendant or the Government.

You must follow the law as I explain it – even if you do not agree with the law – and you must follow all of my instructions as a whole. You must not single out or disregard any of the Court’s instructions on the law.

The indictment or formal charge against a Defendant isn’t evidence of guilt. The law presumes every Defendant is innocent. A Defendant does not have to prove his or her innocence or produce any evidence at all. The Government must prove guilt beyond a reasonable doubt. If it fails to do so, you must find a Defendant not guilty.<sup>2</sup>

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<sup>2</sup> Eleventh Circuit Pattern Jury Instructions – Basic Instruction 2.1 (2020)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 2

Duty to Follow Instructions and the  
Presumption of Innocence When a Defendant Does Not Testify

Your decision must be based only on the evidence presented here. You must not be influenced in any way by either sympathy for or prejudice against a Defendant or the Government.

You must follow the law as I explain it – even if you do not agree with the law – and you must follow all of my instructions as a whole. You must not single out or disregard any of the Court's instructions on the law.

The indictment or formal charge against a Defendant isn't evidence of guilt. The law presumes every Defendant is innocent. A Defendant does not have to prove his or her innocence or produce any evidence at all. A Defendant does not have to testify, and if the Defendant chose not to testify, you cannot consider that in any way while making your decision. The Government must prove guilt beyond a reasonable doubt. If it fails to do so, you must find a Defendant not guilty.<sup>3</sup>

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3 Eleventh Circuit Pattern Jury Instructions – Basic Instruction 2.2 (2020)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 3

Definition of “Reasonable Doubt”

The Government’s burden of proof is heavy, but it does not have to prove a Defendant’s guilt beyond all possible doubt. The Government’s proof only has to exclude any “reasonable doubt” concerning a Defendant’s guilt.

A "reasonable doubt" is a real doubt, based on your reason and common sense after you’ve carefully and impartially considered all the evidence in the case.

“Proof beyond a reasonable doubt” is proof so convincing that you would be willing to rely and act on it without hesitation in the most important of your own affairs. If you are convinced that a Defendant has been proved guilty beyond a reasonable doubt, say so. If you are not convinced, say so.<sup>4</sup>

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4 Eleventh Circuit Pattern Jury Instructions – Basic Instruction 3 (2020)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 4

Consideration of Direct and Circumstantial Evidence; Argument  
of Counsel; Comments by the Court

As I said before, you must consider only the evidence that I have admitted in the case. Evidence includes the testimony of witnesses and the exhibits admitted. But, anything the lawyers say is not evidence and isn't binding on you.

You shouldn't assume from anything I've said that I have any opinion about any factual issue in this case. Except for my instructions to you on the law, you should disregard anything I may have said during the trial in arriving at your own decision about the facts.

Your own recollection and interpretation of the evidence is what matters.

In considering the evidence you may use reasoning and common sense to make deductions and reach conclusions. You shouldn't be concerned about whether the evidence is direct or circumstantial.

"Direct evidence" is the testimony of a person who asserts that he or she has actual knowledge of a fact, such as an eyewitness.

"Circumstantial evidence" is proof of a chain of facts and circumstances that tend to prove or disprove a fact. There's no legal difference in the weight you may give to either direct or circumstantial evidence.<sup>5</sup>

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5 Eleventh Circuit Pattern Jury Instructions – Basic Instruction 4 (2020)

## GOVERNMENT'S PROPOSED INSTRUCTION NO. 5

### Credibility of Witnesses

When I say you must consider all of the evidence, I do not mean that you must accept all of the evidence as true or accurate. You should decide whether you believe what each witness had to say, and how important that testimony was. In making that decision you may believe or disbelieve any witness, in whole or in part. The number of witnesses testifying concerning a particular point doesn't necessarily matter.

To decide whether you believe any witness I suggest that you ask yourself a few questions:

- Did the witness impress you as one who is telling the truth?
- Did the witness have any particular reason not to tell the truth?
- Did the witness have a personal interest in the outcome of the case?
- Did the witness seem to have a good memory?
- Did the witness have the opportunity and ability to accurately observe the things he or she testified about?
- Did the witness appear to understand the questions clearly and answer them directly?
- Did the witness's testimony differ from other testimony or other evidence?<sup>6</sup>

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<sup>6</sup> Eleventh Circuit Pattern Jury Instructions – Basic Instruction 5 (2020)



GOVERNMENT PROPOSED INSTRUCTION NO. 6

Impeachment of Witnesses Because of Inconsistent  
Statements

You should also ask yourself whether there was evidence that a witness testified falsely about an important fact. And ask whether there was evidence that at some other time a witness said or did something, or didn't say or do something, that was different from the testimony the witness gave during this trial.

But keep in mind that a simple mistake doesn't mean a witness wasn't telling the truth as he or she remembers it. People naturally tend to forget some things or remember them inaccurately. So, if a witness misstated something, you must decide whether it was because of an innocent lapse in memory or an intentional deception. The significance of your decision may depend on whether the misstatement is about an important fact or about an unimportant detail.<sup>7</sup>

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<sup>7</sup> Eleventh Circuit Pattern Jury Instructions – Basic Instruction 6.1 (2020)

GOVERNMENT PROPOSED INSTRUCTION NO. 7

Impeachment of Witnesses Because of Inconsistent  
Statements (Defendant with No Felony Conviction Testifies)

You should also ask yourself whether there was evidence that a witness testified falsely about an important fact. And ask whether there was evidence that at some other time a witness said or did something, or didn't say or do something, that was different from the testimony the witness gave during this trial.

But keep in mind that a simple mistake doesn't mean a witness wasn't telling the truth as he or she remembers it. People naturally tend to forget some things or remember them inaccurately. So, if a witness misstated something, you must decide whether it was because of an innocent lapse in memory or an intentional deception. The significance of your decision may depend on whether the misstatement is about an important fact or about an unimportant detail.

A Defendant has a right not to testify. But since a Defendant did testify, you should decide whether you believe that Defendant's testimony in the same way as that of any other witness.<sup>8</sup>

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<sup>8</sup> Eleventh Circuit Pattern Jury Instructions – Basic Instruction 6.5 (2020)

GOVERNMENT PROPOSED INSTRUCTION NO. 8

Expert Witness

When scientific, technical or other specialized knowledge might be helpful, a person who has special training or experience in that field is allowed to state an opinion about the matter. But that doesn't mean you must accept the witness's opinion. As with any other witness's testimony, you must decide for yourself whether to rely upon the opinion.<sup>9</sup>

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<sup>9</sup> Eleventh Circuit Pattern Jury Instructions – Basic Instruction 7 (2020)

GOVERNMENT’S PROPOSED INSTRUCTION NO. 9

Evidence of Concealment and Threats

Intentional concealment or threats against a witness by a person during or immediately after a crime has been committed, or after he/she is accused of a crime, is not, of course, sufficient in itself to establish the guilt of that person. But intentional concealment or threats under those circumstances is a fact which, if proved, may be considered by the jury in light of all the other evidence in the case in determining the guilt or innocence of that person. Whether or not a Defendant’s conduct constituted concealment or a threat is exclusively for you, as the Jury, to determine. And if you do so determine, whether or not that concealment or threat showed a consciousness of guilt on his/her part, and the significance to be attached to that evidence, are also matters exclusively for you as a jury to determine.

I remind you that in your consideration of any evidence of concealment or threats, if you should find that there was concealment or a threat, you should also consider that there may be reasons for this which are fully consistent with innocence. These may include fear of being apprehended, unwillingness to confront the police, or reluctance to confront the witness. And may I also suggest to you that a feeling of guilt does not necessarily reflect actual guilt of a crime which you may be considering.<sup>10</sup>

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10 Eleventh Circuit Pattern Jury Instructions – Special Instruction 19 (2020)(modified)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 10

Note-taking

In this case you have been permitted to take notes during the course of the trial, and most of you have taken advantage of that opportunity.

You will have your notes available to you during your deliberations, but you should make use of them only as an aid to your memory. In other words, you must not give your notes priority over your independent recollection of the evidence or the lack of evidence; and you also must not be unduly influenced by the notes of the other jurors.

I emphasize that notes are not entitled to any greater weight than your memory or impression as to what the testimony may have been.<sup>11</sup>

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<sup>11</sup> Eleventh Circuit Pattern Jury Instructions – Special Instruction 5 (2020)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 11

Introduction to Offense Instructions and Punishment (Multiple Defendants, Multiple Counts)

The indictment in this case contains the charges against the Defendants which you are to consider. This indictment charges separate crimes, called counts.

Each count of the indictment charges a separate crime against a Defendant. You must consider each crime and the evidence relating to it separately. If you find a Defendant guilty of a crime, that must not affect your verdict for any other crime.

I caution you that the Defendants are on trial only for the specific crimes charged in the indictment. You're here to determine from the evidence in this case whether the Defendants are guilty or not guilty of those specific crimes.

You must never consider punishment in any way to decide whether a Defendant is guilty. If you find a Defendant guilty, the punishment is for the Judge alone to decide later.

You will be given a copy of the indictment to refer to during your deliberations.

Count 1 charges both Defendants with conspiracy to export, cause an export, or transfer for export items in violation of the International Emergency Economic Powers Act (IEEPA) and Export Administration Regulations (EAR).

Count 2 charges both Defendants committed what is called a substantive offense, specifically an attempted violation of the IEEPA and EAR.

Count 3 charges both Defendants attempted to smuggle merchandise from the United States, contrary to any law or regulation of the United States.

Count 4 charges Defendant Emilie Voissem with making material false statements to a federal agent.

Note that the Defendants are not charged in Count 1 with committing a substantive offense – they are charged with conspiring to commit that offense. I will explain the law concerning the substantive offense of violating the International Emergency Economic Powers Act in a moment. However, first I will give specific instructions concerning the law of conspiracy.<sup>12</sup>

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12 Eleventh Circuit Pattern Jury Instructions – Basic Instructions 8 and 10.4 (2020)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 12

Conspiracy

18 U.S.C. § 371

It's a separate Federal crime for anyone to conspire or agree with someone else to do something that would be another Federal crime if it was actually carried out.

A "conspiracy" is an agreement by two or more people to commit an unlawful act. In other words, it is a kind of "partnership" for criminal purposes. Every member of a conspiracy becomes the agent or partner of every other member.

The Government does not have to prove that all the people named in the indictment were members of the plan, or that those who were members made any kind of formal agreement.

The Government does not have to prove that the members planned together all the details of the plan or the "overt acts" that the indictment charges would be carried out in an effort to commit the intended crime. The heart of a conspiracy is the making of the unlawful plan itself followed by the commission of any overt act. The Government does not have to prove that the conspirators succeeded in carrying out the plan.

A Defendant can be found guilty of this conspiracy offense only if all the following facts are proved beyond a reasonable doubt:

- (1) two or more persons in some way agreed to try to accomplish a shared and unlawful plan;
- (2) the Defendant knew the unlawful purpose of the plan and willfully joined in it;
- (3) during the conspiracy, one of the conspirators knowingly engaged in at least one overt



act as described in the indictment; and

(4) the overt act was committed at or about the time alleged and with the purpose of carrying out or accomplishing some object of the conspiracy.

An “overt act” is any transaction or event, even one that may be entirely innocent when viewed alone, that a conspirator commits to accomplish some object of the conspiracy.

A person may be a conspirator even without knowing all the details of the unlawful plan or the names and identities of all the other alleged conspirators. If a Defendant played only a minor part in the plan but had a general understanding of the unlawful purpose of the plan and willfully joined in the plan on at least one occasion, that’s sufficient for you to find that Defendant guilty.

But simply being present at the scene of an event or merely associating with certain people and discussing common goals and interests doesn’t establish proof of a conspiracy. A person who doesn’t know about a conspiracy but happens to act in a way that advances some purpose of one doesn’t automatically become a conspirator.<sup>13</sup>

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13 Eleventh Circuit Pattern Jury Instructions – Offense Instruction 13.1 (2020)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 13

Attempted Violation of the International Emergency Economic Powers Act

50 U.S.C. § 1705(a) and 15, Code of Federal Regulations, Part 764.2

It's a federal offense under the IEEPA and EAR to willfully export, or attempt to export, or cause the export or attempted export of, or transfer for export, from the United States an export-controlled item without having first obtained a license from the Department of Commerce.

Count 2 charges that the Defendants, beginning on or about August 9, 2016 to on or about August 12, 2016, knowingly and willfully exported or attempted to export, or caused the export of, four rEvo III rebreathers, from the United States to Libya, without first having obtained the required license from the Department of Commerce, or that the Defendants knowingly and willfully transferred the four rEvo III rebreathers with knowledge that a violation of the EAR was about to occur.

In order for a Defendant to be found guilty of this charge, the Government must prove each of the following elements beyond a reasonable doubt:

First: That the Defendant exported, caused the export, or aided and abetted the attempted export of, an item from the United States;

Second: That the item the Defendant exported, caused the export, or aided and abetted the attempted export of, was controlled for export on the Commerce Control List; and

Third: That the Defendant failed to obtain a license or other authorization from the U.S. Department of Commerce prior to the attempted exportation of the items; and

Fourth: That the Defendant did so willfully, that is, voluntarily and intentionally in violation of a known legal duty.

It is not necessary for the Government to prove that the Defendant knew the precise terms of the statute or regulatory provision he or she is charged with violating; that is, the Government is not required to prove that the Defendant knew the existence or details of the International Emergency Economic Powers Act or the related regulations. All that is required is that the Government prove that the Defendant knew that the law required a license or authorization to export the items charged in the indictment and that the Defendant acted with the intent to disobey or disregard the law.<sup>14</sup>

In some cases, it's a crime to attempt to commit an offense – even if the attempt fails. In this case the Defendants are charged in Count 2 with attempting to commit a substantive offense.

The Defendant can be found guilty of an *attempt* to commit that offense only if both of the following facts are proved beyond a reasonable doubt:

First: That a Defendant knowingly intended to commit the crime of exporting or causing the export of items on the Commerce Control List without a license or authorization from the Commerce Department; and

Second: The Defendant's intent was strongly corroborated by his or her taking a substantial step toward committing the crime.

A “substantial step” is an important action leading up to committing of an offense – not just an inconsequential act. It must be more than simply preparing. It must be an act that would normally result in committing the offense.<sup>15</sup>

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14 Adapted from *United States v. Zambrano*, 752 F. App'x 775, 789 (11<sup>th</sup> Cir. October 9, 2018).

15 Eleventh Circuit Pattern Jury Instructions – Special Instruction 11 (2020)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 14

Smuggling

18 U.S.C. § 554(a)

It is a Federal crime to fraudulently or knowingly attempt to export from the United States any merchandise, article, or object contrary to any law or regulation of the United States.

The Defendants are charged with attempting to smuggle goods from the United States in violation of Section 554(a) of Title 18 of the United States Code. In order for a Defendant to be found guilty of this charge, the Government must prove each of the following elements beyond a reasonable doubt:

First: That a Defendant knowingly or fraudulently attempted to export or send any merchandise, article, or object, as described in the indictment, or that a Defendant received, concealed, bought, sold or in any manner facilitated the transportation, concealment or sale of such merchandise, article, or object prior to exportation;

Second: That the attempted exportation or sending of the merchandise, article, or object was contrary to the International Economic Powers Act (Title 50, United States Code, Section 1705(a)) and Export Administration Regulations (Title 15, Code of Federal Regulations, Part 764.2).

Third: That the Defendant knew that the attempted exportation or sending of the merchandise, article, or object was contrary to law or regulation.

“Merchandise” means goods, wares, and chattels of every description, and includes merchandise the exportation of which is prohibited.

To “export” means to send or carry from the United States to another country.

“Fraudulently” means with the specific intent to deceive or cheat, for the purpose of either causing some financial loss to another, or bringing about some financial gain to one’s self.<sup>16</sup>

In some cases, it’s a crime to attempt to commit an offense – even if the attempt fails. In this case the Defendants are charged in Count 3 with attempting to commit a substantive offense.

The Defendant can be found guilty of an *attempt* to commit that offense only if both of the following facts are proved beyond a reasonable doubt:

First: That a Defendant knowingly intended to commit the crime of smuggling merchandise from the United States; and

Second: A Defendant’s intent was strongly corroborated by his or her taking a substantial step toward committing the crime.

A “substantial step” is an important action leading up to committing of an offense – not just an inconsequential act. It must be more than simply preparing. It must be an act that would normally result in committing the offense.<sup>17</sup>

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16 Adapted from *United States v. Singer*, 963 F.3d 1144 (11<sup>th</sup> Cir. 2020).

17 Eleventh Circuit Pattern Jury Instructions – Special Instruction 11 (2020)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 15

False Statement to a Federal Agency  
18 U.S.C. § 1001

It is a Federal crime to willfully make a false or fraudulent statement to a department or agency of the United States.

Defendant Emilie Voissem can be found guilty of this crime only if all the following facts are proved beyond a reasonable doubt:

- (1) the Defendant made the statement, as charged;
- (2) the statement was false;
- (3) the falsity concerned a material matter;
- (4) the Defendant acted willfully, knowing that the statement was false; and
- (5) the false statement was made or used for a matter within the jurisdiction of a department or agency of the United States.

A statement is “false” when made if it is untrue when made and the person making it knows it is untrue. The Government doesn’t have to show that the Governmental agency or department was, in fact, deceived or misled.

The Department of Commerce and the Department of Homeland Security are agencies of the United States.

The making of a false statement is not a crime unless the falsity relates to a “material” fact.

A “material fact” is an important fact – not some unimportant or trivial detail – that has a natural tendency to influence or is capable of influencing a decision of a department or agency in

reaching a required decision.<sup>18</sup>

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<sup>18</sup> Eleventh Circuit Pattern Jury Instructions – Offense Instruction 36 (2020)

GOVERNMENT’S PROPOSED INSTRUCTION NO. 16

Aiding and Abetting

It’s possible to prove a Defendant guilty of a crime even without evidence that the Defendant personally performed every act charged. Ordinarily, any act a person can do may be done by directing another person, or “agent.” Or it may be done by acting with or under the direction of others.

A Defendant “aids and abets” a person if the Defendant intentionally joins with the person to commit a crime.

A Defendant is criminally responsible for the acts of another person if the Defendant aids and abets the other person. A Defendant is also responsible if the Defendant willfully directs or authorizes the acts of an agent, employee, or other associate.

But finding that a Defendant is criminally responsible for the acts of another person requires proof that a Defendant intentionally associated with or participated in the crime – not just proof that a Defendant was simply present at the scene of a crime or knew about it. In other words, you must find beyond a reasonable doubt that a Defendant was a willful participant and not merely a knowing spectator.<sup>19</sup>

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<sup>19</sup> Eleventh Circuit Pattern Jury Instructions – Special Instruction 7 (2020)



GOVERNMENT'S PROPOSED INSTRUCTION NO. 17

Punishment (Multiple Defendants, Multiple Counts)

Each count of the indictment charges a separate crime against one or more of the Defendants. You must consider each crime and the evidence relating to it separately. And you must consider the case of each Defendant separately and individually. If you find a Defendant guilty of one crime, that must not affect your verdict for any other crime or any other Defendant.

I caution you that each Defendant is on trial only for the specific crimes charged in the indictment. You're here to determine from the evidence in this case whether each Defendant is guilty or not guilty of those specific crimes.

You must never consider punishment in any way to decide whether a Defendant is guilty. If you find a Defendant guilty, the punishment is for the Judge alone to decide later.<sup>20</sup>

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<sup>20</sup> Eleventh Circuit Pattern Jury Instructions – Basic Instruction 10.4 (2020)

GOVERNMENT'S PROPOSED INSTRUCTION NO. 18

On or About; Knowingly; Willfully - Generally

You'll see that the indictment charges that a crime was committed "on or about" a certain date. The Government doesn't have to prove that the crime occurred on an exact date. The Government only has to prove beyond a reasonable doubt that the crime was committed on a date reasonably close to the date alleged.

The word "knowingly" means that an act was done voluntarily and intentionally and not because of mistake or by accident.

The word "willfully" means that the act was done voluntarily and purposely with the specific intent to violate a known legal duty, that is, with the intent to do something the law forbids. Disagreement with the law or a belief that the law is wrong does not excuse willful conduct.<sup>21</sup>

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<sup>21</sup> Eleventh Circuit Pattern Jury Instructions - Basic Instruction 9.1B (2020).

GOVERNMENT'S PROPOSED INSTRUCTION NO. 19

Duty to Deliberate

Your verdict, whether guilty or not guilty, must be unanimous – in other words, you must all agree. Your deliberations are secret, and you'll never have to explain your verdict to anyone.

Each of you must decide the case for yourself, but only after fully considering the evidence with the other jurors. So you must discuss the case with one another and try to reach an agreement. While you're discussing the case, don't hesitate to reexamine your own opinion and change your mind if you become convinced that you were wrong. But don't give up your honest beliefs just because others think differently or because you simply want to get the case over with.

Remember that, in a very real way, you're judges – judges of the facts. Your only interest is to seek the truth from the evidence in the case.

GOVERNMENT'S PROPOSED INSTRUCTION NO. 20

Verdict

When you get to the jury room, choose one of your members to act as foreperson. The foreperson will direct your deliberations and will speak for you in court.

A verdict form has been prepared for your convenience.

[Explain verdict]

Take the verdict form with you to the jury room. When you've all agreed on the verdict, your foreperson must fill in the form, sign it, date it, and carry it. Then you'll return it to the courtroom.

If you wish to communicate with me at any time, please write down your message or question and give it to the marshal. The marshal will bring it to me and I'll respond as promptly as possible – either in writing or by talking to you in the courtroom. But I caution you not to tell me how many jurors have voted one way or the other at that time.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 19-20693-CR-SEITZ

UNITED STATES OF AMERICA

v.

PETER SOTIS and  
EMILIE VOISSEM,

Defendants.

\_\_\_\_\_ /

**VERDICT**

1. We, the Jury, unanimously find Defendant PETER SOTIS, as charged in Count 1 of the Indictment:

GUILTY \_\_\_\_\_

NOT GUILTY \_\_\_\_\_

2. We, the Jury, unanimously find Defendant PETER SOTIS, as charged in Count 2 of the Indictment:

GUILTY \_\_\_\_\_

NOT GUILTY \_\_\_\_\_

3. We, the Jury, unanimously find Defendant PETER SOTIS, as charged in Count 3 of the Indictment:

GUILTY \_\_\_\_\_

NOT GUILTY \_\_\_\_\_

SO SAY WE ALL.

\_\_\_\_\_  
Foreperson (please sign)  
Miami, Florida

\_\_\_\_\_  
Date

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PETER SOTIS and  
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Defendants.

\_\_\_\_\_ /

**VERDICT**

1. We, the Jury, unanimously find Defendant EMILIE VOISSEM, as charged in Count 1 of the Indictment:

GUILTY \_\_\_\_\_

NOT GUILTY \_\_\_\_\_

2. We, the Jury, unanimously find Defendant EMILIE VOISSEM, as charged in Count 2 of the Indictment:

GUILTY \_\_\_\_\_

NOT GUILTY \_\_\_\_\_

3. We, the Jury, unanimously find Defendant EMILIE VOISSEM, as charged in Count 3 of the Indictment:

GUILTY \_\_\_\_\_

NOT GUILTY \_\_\_\_\_

4. We, the Jury, unanimously find Defendant EMILIE VOISSEM, as charged in Count 4 of the Indictment:

GUILTY \_\_\_\_\_

NOT GUILTY \_\_\_\_\_

SO SAY WE ALL.

\_\_\_\_\_  
Foreperson (please sign)  
Miami, Florida

\_\_\_\_\_  
Date