

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 19-20693-CR-SEITZ

UNITED STATES OF AMERICA

vs.

**PETER SOTIS and
EMILIE VOISSEM,**

Defendants.

GOVERNMENT'S PROPOSED VOIR DIRE

Pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, the United States respectfully requests that the Court inquire into the following areas during jury selection.

Respectfully submitted,

JUAN ANTONIO GONZALEZ
ACTING UNITED STATES ATTORNEY

By: s/ Michael Thakur
MICHAEL THAKUR
Assistant United States Attorney
Florida Bar No. 1011456/
Court Id No. A5501474
U.S. Attorney's Office - SDFL
99 Northeast Fourth Street, 8th Floor
Miami, Florida 33132-2111
Telephone: (305) 961-9361
E-mail: Michael.Thakur@usdoj.gov

GOVERNMENT'S PROPOSED VOIR DIRE

(1) Does anyone have strong feelings about federal law enforcement, be it from your own experiences or from the experiences of friends and family? If so, would these feelings affect your ability to listen to the testimony of a federal agent from the Commerce Department, Homeland Security, or Customs and Border Protection, and treat it like that of any other witness?

(2) It is against the law for items on the Commerce Control List to be exported to certain countries without a license. Does anyone think that this law is misguided—that people should be able to export any item they want to any place without permission from the government, regardless of concerns that the government may have about national security or terrorism?

(3) This case involves the alleged attempted export of rebreathers. A rebreather is an apparatus that absorbs the carbon dioxide of a scuba diver's exhaled breath to permit the rebreathing (recycling) of each breath. Does anyone have experience with or strong feelings about rebreathers, such that you don't feel you could be impartial or fair?

(4) Has anyone seen anything in the media (newspapers, blogs, Internet publications) regarding this case or the defendants, Peter Sotis or Emilie Voissem? If so, please tell the Court (at sidebar) what you have heard and whether you could put that information aside and be fair and impartial in this case.

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 E. Thakur

Michael E. Thakur
Assistant United States Attorney