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ATTORNEYS FOR DEFENDANT

In The District Court For the District of Wyoming

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
NATHANIEL SOLON)
)
Defendant.)

Case No. 07-CR-32-B

PROPOSED VOIR DIRE

COMES NOW, the Defendant, Nathaniel Solon, by and through his attorneys Frank R. Chapman and Thomas R. Smith, and respectfully proposes the following Voir Dire:

1. Have any of you read or are you familiar with the recent news articles on child pornography?
2. Are you, or to your knowledge, is any of your immediate family personally acquainted with, or related to in any way, to any member of the Prosecution team or their family or any member of the United States Attorney's office?
3. Are you, or is any member of your family employed by the United States Government, the State of Wyoming or by any local governmental entity?

4. Are you personally acquainted with anyone who is employed by the Wyoming State Department of Criminal Investigation, Office of Special Investigations or the federal court system, and if so, who is that person and what is the nature of your relationship?

5. Is any juror personally acquainted with or related to Nathaniel Solon?

6. Is any juror personally acquainted with or related to Mr. Chapman or Mr. Smith, the attorneys for the Defendant, Ned Solon?

7. Is any juror personally acquainted with Greg Coffey?

8. Is any juror personally acquainted with Robert Reilly?

9. Are you now or have you ever been employed (either on a salaried basis or volunteer basis) by a law enforcement agency and if so, where were you so employed and in what capacity?

10. Have any members of your family or friends ever been charged with a serious criminal offense, i.e. more than a traffic ticket?

11. The Court will instruct you at the end of the case on certain legal matters. Is there anyone on this jury that would have a problem in following the law as the Court gives it to you even though you may not agree with the law?

12. Would any of you change your verdict if a majority of the other jurors believed that a person was guilty and you were in the minority?

13. Have any of you had any prior jury duty?

14. Have any of you ever served on a Grand Jury?

15. Do you believe because Ned Solon is before the Court and charged with a crime that mere fact means he must have committed some violation of the law?

16. Do you consider the fact that because Ned Solon is a defendant in this matter that he must be guilty or else he would not be here?

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served this 25th day of September, 2007, by U.S. Mail, addressed to:

Jim Anderson
U.S. Attorney's Office
PO Box 668
Cheyenne, WY 82003-0668

_____/S/_____
Cheryl Deere