

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-vs-)	No. 5:14-cr-00318
)	
DOUGLAS G. WILLIAMS,)	HON. VICKI MILES-LaGRANGE
)	
Defendant.)	

UNITED STATES' REQUESTED VOIR DIRE QUESTIONS

Comes now the United States, by and through its undersigned counsel, and respectfully requests that this Court ask the following questions of the jury panel during the jury selection process:

1. There are several potential witnesses who may be called or names that you may hear throughout the course of the trial:

Douglas Robbins

Javier Domingo "J.D." Castillo

Brian Luley

Jeff Bartlett

Karen Graves

Richard Porth

Are you acquainted with any of these individuals? If yes, please explain.

2. Have you or any member of your family ever taken a polygraph examination? If yes, please explain.

a. if you have taken a polygraph examination, did you do anything to prepare for the examination? If so, what?

b. if a family member took a polygraph examination, did they do anything to prepare for the examination? If so, what?

3. The government alleges that the defendant trained people to lie during polygraph examinations that were to be conducted as part of law enforcement and background investigations. Do you have any concerns about the use of polygraph examinations? If yes, please explain.

4. I am told that the government will present evidence regarding an undercover or “sting” operation in which government agents pretended to be individuals who were going to be subjected to a polygraph regarding a federal job. Do you have any concerns or opinions regarding undercover or sting operations, or the government relying on such operations in a criminal case? If yes, please explain.

In Oklahoma City, Oklahoma, this 4th day of May, 2015.

RAYMOND HULSER
Acting Chief, Public Integrity Section

/s/ Brian K. Kidd
Brian K. Kidd
Heidi Boutros Gesch
Trial Attorneys
U.S. Department of Justice
Criminal Division, Public Integrity Section
1400 New York Ave., NW
Washington, DC 20005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing United States' Motion Requesting Voir Dire Questions with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorney of record for the defendant.

/s/ Brian K. Kidd
Brian K. Kidd
Trial Attorney