

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 22-cr-185 (JDB)
	:	
YVONNE ST CYR,	:	
:	:	
Defendant.	:	

STATEMENT OF THE CASE

In this criminal case the government has accused the defendant, Yvonne St Cyr of participating in a civil disorder; entering and remaining in a restricted building or grounds; disorderly and disruptive conduct in a restricted building or grounds; disorderly conduct in a Capitol building; and parading, demonstrating, or picketing in a Capitol building. Ms. St Cyr has pled not guilty to these charges.

PROPOSED VOIR DIRE

Knowledge of Participants in the Case

1. The United States is represented in this case by Assistant United States Attorneys **JACQUELINE SCHESNOL** and **ERIC BOYLAN**, and they are being assisted by paralegal **BRIANNA RUMMENS**, all of whom work with the United States Attorney’s Office here in Washington, D.C. Also at counsel table is **FBI Special Agent MATTHEW GANO**. **PLEASE STAND**. Do you know or have you had any contact with these individuals?
2. **YVONNE ST CYR** is represented in this case by **NICOLE OWENS AND HEIDI JOHNSON** from Idaho. **PLEASE STAND**. Do you know or have you had any contact with **YVONNE ST CYR, NICOLE OWENS, or HEIDI JOHNSON**?
3. During the course of the trial, you may hear testimony from or about a number of people. The attorneys will now identify for you the names of people who may testify or about whom you may hear testimony. Listen carefully and, if you recognize or know any of the people named, please mark your paper. The Government’s counsel may go first, and then defense counsel may list any additional names.
4. Please look around you. Do you know or recognize any other member of the prospective jury panel, the courtroom staff, or me?

Presumption of Innocence, Burden of Proof, and Reasonable Doubt

5. The defendant in this case, just as every defendant in a criminal trial, is presumed innocent and, therefore, has no obligation to testify or present any evidence in the case. Would you have any difficulty accepting and applying this legal instruction?
6. The prosecution has the burden of proof. This means that the jury cannot return a guilty verdict against a defendant unless the prosecution has proven beyond a reasonable doubt that the defendant is guilty of the crime charged. Would you have any difficulty accepting and applying this legal instruction?
7. Would you draw an adverse inference if the defendant chose not to testify on his own behalf in this case?
8. If after you have heard all the evidence, you find that the government has proven beyond a reasonable doubt every element of the offense, it is your duty to find the defendant guilty. On the other hand, if you find that the government has failed to prove any element of the offense beyond a reasonable doubt, you must find the defendant not guilty. Would you be reluctant or unable to carry out this duty?

Familiarity with Prosecution/ Defense/ Police Work/ Jury Service/ Etc.

9. Have you, any member of your family or close friend ever studied law or been employed by a lawyer or a law firm, worked in a courthouse, as a paralegal or legal secretary, or performed legal investigative work?
10. Have you, any member of your family or close friend ever been employed by any local, state, or federal law enforcement agency or a private security company? Law enforcement agencies include for example, the Metropolitan Police Department, the United States Capitol Police, the U.S. Marshals Service, the Federal Bureau of Investigation (FBI), or the United States Secret Service.
11. Have you, any member of your family or close friend had any experiences with any law enforcement agency or the government that might cause you to favor or disfavor the government or law enforcement?
12. Have you ever filed a complaint against a police officer or anyone in law enforcement?
13. Have you, any member of your family, or close friend ever been the subject of a criminal investigation, been accused of criminal conduct, been arrested, or convicted of a crime, been a victim of a crime, been a witness to a crime, testified in court or before a grand jury as a witness to a crime, or been required to appear in court for any reason?
 - i. If so, what type of crime? How was the case resolved? When was it resolved?
 - ii. Were you satisfied with the way the case was handled by law enforcement, prosecutors, and/or the court?
 - iii. Would that have any effect on your ability to be fair and impartial in evaluating

this case or deliberating on a verdict?

14. Do you have any opinions about prosecutors or defense attorneys that might affect your ability to serve fairly and impartially in this trial?
15. In this case, law enforcement officers will be witnesses. Would you tend to believe or not believe the testimony of a law enforcement officer simply because he or she is a law enforcement officer? In other words, would you tend to give more or lesser weight to the testimony of a law enforcement officer than to the testimony of other witnesses?
16. Have you served on a grand jury or trial jury before? If served on a trial jury:
 - i. Was it a criminal or a civil case?
 - ii. Did you reach a verdict?
 - iii. Was there anything about your experience as a juror which would make you not want to serve again?

Nature of the Charges

17. During the course of this trial, you will hear about the events at the United States Capitol on January 6, 2021. Do you, any member of your family or close friend live, work near, or have any special familiarity with the immediate area of the United States Capitol?
18. Were you, any member of your family, or close friend present at the U.S. Capitol on January 6, 2021?
19. Regardless of what you may have heard or seen about events at the U.S. Capitol on January 6, 2021, and no matter what opinions you may have formed, can you put all of that aside and decide this case only on the evidence you receive in court, follow the law, and decide the case in a fair and impartial manner?
20. Have you ever watched video of this defendant, Ms. St Cyr, relating to January 6, 2021, on the news, on the internet, or any other way?
21. If you were selected as a juror in this case, I will instruct you to avoid and not seek out any media coverage about this case; the defendant, Yvonne St Cyr; or any hearings held by the House Select Committee concerning events at the U.S. Capitol on January 6, 2021, including radio, television, podcasts, social media, and the internet. I will instruct you not to Google or search for information about Yvonne St Cyr. Would you have difficulty following this instruction?

Medical Problem / Hardship / Catch-all

22. Do you feel so uncomfortable being in a room with other jurors and trial participants, due to the COVID-19 pandemic, that it would be difficult for you to pay attention or otherwise to serve as a juror in this case?

23. Are you currently caring for a relative or close friend, who has been infected by, or exposed to persons infected with, COVID-19, such that it would be difficult for you to pay attention or otherwise to serve as a juror in this case?
24. The lawyers have predicted that the presentation of evidence in this trial should last about four days, but it could run longer. The jury will sit Monday through Friday, generally from 9:30 a.m. to 5 p.m., although the starting and ending times may vary. The length of jury deliberations following the presentation of evidence at trial will be determined by the jury itself. Do you have an urgent or extremely important matter to attend to this week and next, such that you could be faced with a hardship if selected to serve on the jury in this case?
25. To reach a verdict on a particular charge, every juror must agree on the verdict. That is, any verdict must be unanimous. In deliberations you must consider the opinions and points of your fellow jurors, but you must also follow your own conscience and be personally satisfied with any verdict. Would you have difficulty expressing your own opinions and thoughts about this case to your fellow jurors?
26. Do you have any vision, language, or hearing problems, or any other physical or medical problems, that might interfere with your ability to hear or understand what the witnesses say in this case, to view exhibits and photographs, or to give your full attention to this case?
27. Do you have any moral, religious, or ethical beliefs that prevent you from sitting in judgment of another person?
28. The law requires that the jurors weigh the evidence in a case and determine the guilt or innocence of the defendant solely upon the basis of the evidence, without any consideration of the matter of punishment and without prejudice, fear, sympathy, or favoritism. Do you believe that you would have difficulty following this instruction?
29. Do you know of any reason, or has anything occurred to you during this questioning, that might in any way prevent you from following my instructions on the law and being completely fair and impartial as a juror in this case?