

Nicole Owens  
FEDERAL PUBLIC DEFENDER  
FEDERAL DEFENDER SERVICES OF IDAHO  
702 West Idaho Street, Suite 1000  
Boise, Idaho 83702  
Telephone: (208) 331-5500  
Facsimile: (208) 331-5525

Attorneys for Defendant  
YVONNE ST CYR

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	1:22-cr-00185-JDB
	)	
Plaintiff,	)	DEFENDANT’S PROPOSED
	)	VOIR DIRE
vs.	)	
	)	
YVONNE ST CYR,	)	
	)	
Defendant.	)	
	)	
_____	)	

January 6, 2021 – Specific Questions

1. Do you or someone you know have any direct or indirect connection to events at the U.S. Capitol on January 6, 2021?
2. Did you watch live news coverage of the events at the U.S. Capitol on January 6, 2021?
3. Since January 6, 2021, how much news coverage have you seen, heard, or read about the events that took place at the U.S. Capitol building on

January 6, 2021, the investigations, arrests, and court proceedings of those individuals involved? – a lot, quite a bit, some, not much, or none at all?

4. Has most of the media coverage you have seen, heard, or read suggested the defendants are likely guilty or innocent of the charges brought against them?
5. Have you ever watched videos of what happened at the U.S. Capitol on January 6, 2021, on the news or on the Internet? If yes, how many times? (1 time, 2-3 times, 4-5 times, 6 or more times).
6. Have you ever read any news articles or watched any news pieces about Yvonne St. Cyr?
7. Have you ever watched video of Ms. St Cyr from January 6, 2021, on the news or on the Internet? If yes, how many times? (1 time, 2-3 times, 4-5 times, 6 or more times).
8. Have you formed any opinions about Ms. St Cyr's case?
9. How do you get your news? Newspapers, TV, Radio, Social Media, Podcasts?
10. Do you use social media? If yes, what platform(s) do you use, and what do you use them for?
11. Do you follow anyone on any social media platform who regularly reports or comments on the events of January 6, 2021?

12. Have you watched any documentary's relating to the events of January 6?
13. Have you or a close friend or family member been employed or had any association or connection with the House Select Committee to Investigate the January 6, 2021 events at the U.S. Capitol?
14. Did you attend, view, or listen to any portion of any Congressional hearing related to the events that occurred at the United States Capitol on January 6, 2021?
15. Are you, or any of your immediate family members or close friends currently employed by or have any affiliation with the media?
16. Do you tend to generally believe what is reported by the media?
17. Have you ever been concerned about truthfulness in media and reporting?
18. Do any of you live or work at or near the U.S. Capitol? If so, were you working/living at the U.S. Capitol on January 6, 2021?
19. Have you ever been on the Capitol grounds or inside the Capitol building?
20. Are you, any family member, or a close friend an employee of the Capitol Police? Or the Metropolitan Police Department? Or the Secret Service? If so, were they working on January 6, 2021 at the U.S. Capitol Building?

21. Did you have a concern for the safety of yourself, a close friend, or family member on January 6, 2021?
22. Do you have any strong feelings or opinions about what happened on January 6, 2021, that would make it difficult for you to render a fair and impartial verdict if you are chosen as a juror?
23. Do you believe that you and/or the residents of Washington, D.C. were personally victims of the events which transpired at the U.S. Capitol on January 6, 2021?
24. From what you have heard or read, do you think that people who were arrested for involvement in the events on January 6, 2021 at the U.S. Capitol Building are likely guilty of the charges brought against them?
25. When thinking about the people involved in the events on January 6, 2021, would you describe their actions as an insurrection? Or an effort to overthrow the US government?
26. Do you have an unfavorable opinion of the people arrested for participating in the events at the U.S. Capitol on January 6, 2021?
27. Do you think that merely because someone (besides law enforcement) was present at the Capitol building on January 6, 2021, that they are guilty of criminal conduct?

28. Would your opinion concerning former President Donald Trump or his supporters make it difficult for you to serve as a fair and impartial juror in this case?
29. Would you describe any of the people arrested for their involvement in the events on January 6, 2021 at the U.S. Capitol building as conspiracy theorists? Criminals? Or White supremacists?
30. Do you have strong feelings about persons who do not accept the results of the 2020 Presidential Election?
31. Do you think that your political views, or those of your spouse, partner or other family member, will affect your service as a juror in this case?
32. Have you or a close friend or family member previously been called for jury service for a trial related to the events of January 6, 2021?

General Questions

33. The government has the burden of proving that Ms. St Cyr is guilty beyond a reasonable doubt, and she is presumed innocent unless and until the government meets that burden. This burden of proof never shifts to Ms. St Cyr, and because the defendant is presumed innocent, she need not offer any evidence. Would you have any difficulty or hesitation with respecting the high burden of proof the government is held to? Would the fact that Ms. St Cyr has been charged make it difficult for you to presume she is innocent of those charges at this time?

34. Do you think it is fair that the government has the burden to prove Ms. St Cyr guilty?
35. Would you be able to keep an open mind and presume that a defendant charged with a crime is innocent unless and until proven guilty beyond a reasonable doubt?
36. What is proof beyond a reasonable doubt? What does that mean to you?
37. If the United States fails to prove Ms. St Cyr's guilt beyond a reasonable doubt, she must be found not guilty. Would you have any difficulty finding her not guilty if the government did not meet its burden?
38. Do you currently have an opinion regarding Ms. St Cyr's guilt or innocence in this case?
39. A defendant has a constitutional right not to testify, and, if Ms. St. Cyr decides not to testify, I will instruct you that you may not hold that silence against her in any way. Would you have any difficulty following that instruction? Would you expect that Mr. St Cyr should testify regardless of her constitutional right not to testify?
40. Have you, a family member, or a close friend ever worked for any of the following organizations: First, any type of federal, state, or local law enforcement agency, including the Metro Transit Police Department, the Metropolitan Police Department, the U.S. Marshals Service, the Capitol Police, the Park Police, the Secret Service, the Federal Bureau of

Investigation, the Drug Enforcement Administration, or any local police department? Second, a local, state, or federal prosecutor's office such as the Office of the Attorney General for the District of Columbia, the United States Attorney's Office, or a state's attorney or commonwealth attorney? Third, any public defender, or private criminal defense office? Fourth, any jail, prison, or other type of penal institution? Fifth, a private security company? Do you have opinions about any of these organizations that would interfere with your ability to be a fair and impartial juror?

41. Do you have strong opinions about criminal defendants, defense attorneys, or prosecutors that would make it difficult for you to render a fair and impartial verdict if you are chosen as a juror?
42. Do you belong to any Societies, Unions, Professional Associations, Political Action Organizations, Civic Clubs, Fraternities, Sororities, or other similar organizations?
43. There will be testimony from police or other law enforcement officers in this case. Would you tend to believe or disbelieve their testimony – or find them more or less credible than other witnesses – because they are police or law enforcement officers?
44. Have you, a family member, or a close friend ever been a victim of or witness to a crime?

45. Do you have any religious, moral, or philosophical reason that you believe would make it hard for you to be impartial and render a fair verdict in this case?
46. Is there anyone who would be tempted to find Ms. St Cyr guilty because you believe she committed a crime, even if the government had not established all the elements of the crimes?
47. Does anyone believe their verdict in this case is about punishing Ms. St Cyr?
48. Would any of you change your verdict if most of the other jurors believe Ms. St Cyr was guilty and you were in the minority?
49. Would any of you allow fear or later criticism to affect your verdict?

Dated: February 27, 2023

Respectfully submitted,  
NICOLE OWENS  
FEDERAL PUBLIC DEFENDER  
By:

/s/ Nicole Owens  
Nicole Owens  
Federal Defender Services of Idaho  
Attorneys for Defendant  
YVONNE ST CYR



CERTIFICATE OF SERVICE

I CERTIFY that I am an employee of the Federal Defender Services of Idaho, and that a copy of the foregoing document was served on all parties named below on this 27th day of February, 2023.

Jacqueline Schesnol, Assistant United States Attorney

Capitol Riot Detailee

Two Renaissance Square

40 N. Central Ave., Suite 1800

Phoenix, AZ 85004-4449

(602) 514-7500

[jacqueline.schesnol@usdoj.gov](mailto:jacqueline.schesnol@usdoj.gov)

United States Mail

Hand Delivery

Facsimile Transmission

CM/ECF Filing

Email Transmission

Dated: February 27, 2023

/s/ Joy Fish

Joy Fish