

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA \*

\*

V. \*

Case No. 1:21-CR-623-2 (CRC)

\*

KIRSTYN NIEMELA \*

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**DEFENDANT’S REQUESTED SUPPLEMENTAL VOIR DIRE**

Defendant, Kirstyn Niemela, respectfully requests that this Court ask the following general questions of the venire then follow up with individual questioning of the venire where warranted based on juror’s answers.

Further, Defendant moves that questions regarding prospective jurors’ attitudes towards sexual orientation be asked individually. As grounds for this request, such an inquiry touches upon topics that many prospective jurors may find embarrassing to answer in a group setting.

**SEXUAL ORIENTATION BIAS**

1. You may hear evidence in this case that the Defendant, Ms. Niemela, was involved in a same sex relationship at or around the time frame alleged in the indictments.
  - a. Have you, a relative or close friend, ever formed a close friendship or associations with individuals involved in a same sex relationships?
  - b. Have you ever disassociated or separated yourself from someone due to that individual being in a same sex relationship?
2. Do you have any strong feelings or opinions about individuals involved in same sex relationships?
3. Do you believe that individuals involved in same sex relationships are more likely to engage in the alleged offenses that the Defendant is charged with?
4. Would hearing evidence that the Defendant was involved in a same sex relationship interfere with your ability to be fair and impartial if you were selected as a juror in this case?

Respectfully submitted

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA \* \* V.  
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someone due to that individual being in a same sex relationship? 2. Do you have any strong feelings or opinions  
about individuals involved in same sex relationships? 3. Do you believe that individuals involved in same sex  
relationships are more likely to engage in the alleged offenses that the Defendant is charged with? 4. Would

hearing evidence that the Defendant was involved in a same sex relationship interfere with your ability to be fair  
and impartial if you were selected as a juror in this case? Respectfully submitted Kirstyn Niemela, By her

Attorneys, Date: January 17, 2023 /s/ Paul J. Garrity Paul J. Garrity, Bar No. 905 14 Londonderry Road  
Londonderry, NH 03053 603-434-4106 garritylaw@myfairpoint.net /s/ Richard F. Monteith Richard Monteith, Bar

No. 9352 14 Londonderry Road Londonderry, NH 03053 603-437-2733 monteithlaw@aol.com CERTIFICATE OF  
SERVICE I, Richard F. Monteith and Paul J. Garrity, herein certify that on this 17th day of January, 2023, a copy

of the within was e-filed for all parties involved and mailed, postage pre-paid, to Kirstyn Niemela. Date: January  
17, 2023 /s/ Paul J. Garrity Paul J. Garrity /s/ Richard F. Monteith Richard Monteith

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603-437-2733  
[monteithlaw@aol.com](mailto:monteithlaw@aol.com)

**CERTIFICATE OF SERVICE**

I, Richard F. Monteith and Paul J. Garrity, herein certify that on this 17th day of January,  
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Date: January 17, 2023

/s/ Paul J. Garrity

Paul J. Garrity

/s/ Richard F. Monteith  
Richard Monteith