

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
No. 08-CR-364 (RHK/AJB)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**DEFENDANT'S PROPOSED JUROR
QUESTIONNAIRE TOPICS**

THOMAS JOSEPH PETTERS,

Defendant.

Defendant Thomas Joseph Petters, by and through his undersigned attorneys, hereby submits a “statement of the topics he wishes to have addressed in a Court-authorized jury questionnaire,” pursuant to the Court’s Order. [Docket No. 147 at 1.] Reserving the right to make further submissions as circumstances warrant, we request that the following topics be included in a juror questionnaire:

1. Personal Data: work, family, residence, marital status, etc.
2. Knowledge of this case and/or the press coverage of it.
 - a. Attitudes about the case.
 - b. Attitudes about the press coverage.
3. Attitudes about the press in general.
4. Attitudes about the media, shows watched, radio stations listened to, newspapers, periodicals and books read.
5. Whether the juror uses the internet.

6. Whether the juror has visited weblog (“blog”) sites pertinent to this case, and whether the jurors have or intend to conduct online searches of the lawyers in the case.
7. Whether the juror uses Twitter, MySpace, Facebook, YouTube, other such internet sites, or any weblog sites.
8. Acquaintance with or knowledge of any of the parties, attorneys, witnesses, alleged victims, or entities.
9. Acquaintance with or knowledge of any of Petters Company, Inc., Petters Group Worldwide, Polaroid, Fingerhut, Sun Country Airlines, and any other companies associated with Mr. Thomas J. Petters.
10. Whether the prospective juror considers him or herself or family or friends a victim of the crimes alleged.
11. Attitudes about business executives and salespeople, and business executives and salespeople charged with offenses.
12. Attitudes about corporate bonuses and compensation.
13. Attitudes about the diverting, liquidation, and discount businesses.
14. Attitudes about the federal witness protection (WITSEC) program, informants, and incentives to government witnesses.
15. Attitudes about hedge funds and lack of regulation of the same.
16. Attitudes about lawyers, auditors, and accountants.
17. Attitudes about rich people and “extravagant lifestyle,” to quote the government.
18. Attitudes about profanity, swearing, and blue language.

19. Attitudes about casino gambling.
20. Attitudes about marriage, divorce, and children born to unmarried persons.
21. Attitudes about the death of a child.
22. Attitudes about drug dependency and excessive alcohol consumption.
23. Attitudes about the Roman Catholic Church and practicing Roman Catholics.
24. Attitudes about handguns kept in the house.
25. Attitudes about charitable giving.
26. Attitudes about the FBI, the IRS, and law enforcement officers.
27. Attitudes about the criminal justice system, proof beyond a reasonable doubt, and the presumption of innocence.

Dated: March 27, 2009

s/ Jon M. Hopeman

Jon M. Hopeman, MN #47065
Eric J. Riensche, MN #309126
Jessica M. Marsh, MN #388353
Felhaber, Larson, Fenlon & Vogt, P.A.
220 South Sixth Street, Suite 2200
Minneapolis, MN 55402-4504
Telephone: (612) 339-6321

Paul C. Engh, MN #134685
Engh Law Office
220 South Sixth Street, Suite 215
Minneapolis, MN 55402
Telephone: (612) 252-1100

Attorneys for Defendant Thomas J. Petters