

STATE OF NEW HAMPSHIRE

COÖS, SS.

NOVEMBER 2021

State of New Hampshire

v.

Volodymyr Zhukovskyy

214-2019-CR-78

STATE'S PROPOSED QUESTIONS FOR COURT-CONDUCTED VOIR DIRE

NOW COMES the State of New Hampshire, by and through the Offices of the Coös County Attorney and the Attorney General, and submits the following requests to charge with respect to the preliminary court-conducted *voir dire* of prospective jurors:

1. **Media Exposure**

- a. Some of you may have heard or read about aspects of this case from media or other sources. If you have been exposed to such information, would that impact your ability to objectively view the evidence in the case and remain impartial?

Will you be able to put aside whatever you may have read or heard about the case, and any opinions that you may have formed, and reach a decision solely on the evidence that you receive in court, and the legal instructions that I give you?

2. **Motor Vehicle Accidents**

- a. Have you, or any close friend or member of your immediate family, ever been involved in a motor vehicle accident involving death or serious bodily injury?
- b. During this case, trial, you will hear testimony about a motor vehicle accident that caused the deaths of seven people, and seriously injury to another person. Is there

anything about your previous experience that would prevent you from being an impartial juror in this case?

3. **Motor Vehicle Accidents Involving DWI**

- a. Have you, or any close friend or member of your immediate family, ever been involved in a motor vehicle accident involving “driving while intoxicated,” also known as “DWI,” or impaired driving?
- b. During this trial, you may hear testimony about impaired driving. Is there anything about your previous experience that would prevent you from being an impartial juror in this case?

4. **Commercial Driver’s Licenses**

- a. Have you, or any close friend or member of your immediate family, ever held a commercial driver’s license, commonly known as a “CDL”?
- b. Have you, or any close friend or member of your immediate family, ever been involved in a motor vehicle accident involving a vehicle driven by a person with a CDL?
- c. Is there anything about your past experience with CDLs that would prevent you from being impartial in this case?

WHEREFORE, the State of New Hampshire respectfully requests that this Honorable Court:

- (A) During the court-conducted *voir dire* of prospective jurors, ask the questions set forth above; and
- (B) Grant such further relief as may be deemed just and proper.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

By its attorneys,

November 5, 2021

/s/ John G. McCormick
John G. McCormick, Esq.
Coos County Attorney
NH Bar #16183
Office of the Coos County Attorney
55 School St. Suite 141
Lancaster, NH 03584
(603)788-5559

/s/ Scott D. Chase
Scott D. Chase, Esq.
Assistant Attorney General
NH Bar #268772
Office of the Attorney General
Criminal Justice Bureau
33 Capitol Street
Concord, NH 03301-6397

/s/ Joshua L. Speicher
Joshua J. Speicher, Esq.
Assistant Attorney General
NH Bar #273020
Office of the Attorney General
Criminal Justice Bureau
33 Capitol Street
Concord, NH 03301-6397

CERTIFICATE OF SERVICE

I certify that this pleading has been provided to counsel of record, through the Superior Court's electronic filing system.

/s/ Joshua L. Speicher
Joshua L. Speicher, Esq.