

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

United States of America,

-against-

HERNAN LOPEZ, CARLOS MARTINEZ,
AND FULL PLAY GROUP, S.A.,

Defendants.

Case No.: CR. No. 15-252 (S-3) (PKC)

DEFENDANT'S PROPOSED QUESTIONS FOR VOIR DIRE EXAMINATION

Defendant Full Play Group, S.A. respectfully requests that the following questions be asked of prospective jurors:

1. Have you watched a soccer match either live or on TV in the last 10 years?
 - a. If so, what was the last one you watched?
 - b. How often do you watch?
 - c. Do you follow a particular team or league, and if so, which?
2. Would you have difficulty finding in favor of a corporation for any reason?
3. Would you have difficulty treating a corporation in the same manner as an individual defendant for all purposes, particularly for the purpose of determining innocence or guilt?
4. Would you have difficulty treating a corporation in the same manner as an individual defendant for the purpose of determining intent?
5. This case involves many individuals and companies from South America. Do you believe that you can be open-minded with respect to cultural differences that may be relevant to the trial?
6. Have you traveled to South or Central America?
7. Have you conducted business in South or Central America?
8. This case involves a company that was based in South America. Do you have a predisposition to believe that all business dealings in South America are corrupt?
9. Do you have any feelings, opinions, or beliefs related to FIFA, CONMEBOL, CONCACAF, or any other soccer organization?

10. Will you be watching or following (or have watched or followed) the 2022 World Cup or its Qualifiers?
11. Do you have, or have you recently had, any family or close friends living abroad?
12. For which social media platforms (Twitter, Facebook, etc.), if any, do you have an account?
 - a. How often do you access your account for each platform?
 - b. How often do you post on your account for each platform?
13. Which podcasts, if any, are you subscribed to or listen to regularly?
14. Do you have any fridge magnets or bumper stickers?
15. Have you ever lost an opportunity because another party acted in a way that you felt was illegal, unfair, or unethical?
16. Generally speaking, the defendants are charged with crimes relating to bribery. They have pleaded not guilty to the charges and are presumed innocent until proven guilty. Have you formed any opinions about any of the three defendants that would prevent you from being a fair and impartial juror in this case?

We reserve our rights to seek any additional *voir dire* questions after review of the completed jury questionnaires.

Dated: April 25, 2022
New York, New York

BAKER & HOSTETLER LLP

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