

IN THE COURT OF COMMON PLEAS OF
LEBANON COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA : No. CP-38-CR-0430-2023
vs. :
VERONIKA RODRIGUEZ :

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CLERK OF COURTS
LEBANON, PA
2025 MAR 27 A 9:08

COMMONWEALTH'S MOTION FOR INDIVIDUAL VOIR DIRE

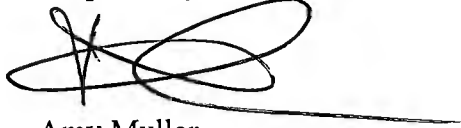
AND NOW, comes the Commonwealth, by and through the Office of the District Attorney of Lebanon County, in support of its Motion for Individual Voir Dire in the above-captioned case:

- (1) On March 8, 2023, the Fort Indiantown Police Department charged the Defendant with a Felony Violation of the Wiretap Act and Misdemeanor False Reports.
- (2) Specifically, it is alleged the Defendant secretly and surreptitiously recorded consensual sexual acts with the victim. It is further alleged the Defendant made the false police report of 'rape' against the victim to justify recording the victim without his knowledge.
- (3) During the pendency of the case, the Defendant gave interviews to various media sources. Additional media sources covered her case and touted she is a 'rape victim' charged with filming her attacker. Various social media sites contain statements and postings about the case and the Defendant's claim of being a 'rape victim.'
- (4) The media coverage continues to this day. The coverage spans six (6) months in length thus far. The coverage includes social media, tv news, and print news.

- (5) The Commonwealth possesses grave concern as to the preservation of the jury's objectivity and potential for taint within the jury pool on the day of voir dire.
- (6) The Commonwealth possesses additional concerns that questioning the jury *en masse* would leave the potential for one juror's answers to affect the rest of the panel.
- (7) Pursuant to Pa.R.Crim.P. 631 (E)(1)(a) '*Impaneling Jury*' (2010), the Commonwealth thus requests individual voir dire examination and selection.
- (8) The Commonwealth further requests This Honorable Court follow the procedures used in the *Commonwealth v. Kim Maurer* trial – a high publicity homicide. In that trial, the Court utilized individual voir dire. Prior to the commencement of voir dire, the Court also sent a supplemental list of juror questions to every potential juror along with the standard issued juror questionnaire. Jurors completed both documents and returned them to Court Administration. Both parties then reviewed the juror responses to the standard and supplemental questionnaire. Both parties then told the Court if they had an objection to any juror reporting for jury service on the day of selection. The Court made the ultimate ruling whether any juror was pre-disqualified. Court Administration relieved those disqualified jurors. The remaining jurors reported in typical fashion for individual voir dire.
- (9) The Commonwealth is requesting that both Defense and Commonwealth have proposed questions to the Court by April 2, 2025. The Commonwealth is requesting that the Court and Counsel have a status conference to discuss the proposed questions, and that a completed questionnaire be sent to the potential jurors by April 15, 2025.

WHEREFORE, the Commonwealth respectfully requests that This Honorable Court issue an Order which grants its Motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Amy Muller', with a long horizontal line extending to the right.

Amy Muller
Senior Deputy District Attorney
Office of the District Attorney for Lebanon County
PA Attorney No. 210216
400 South 8th Street, Room 11
Lebanon, Pennsylvania 17042

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vs.	:	
	:	
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CERTIFICATE OF SERVICE

Amy Muller, Senior Deputy District Attorney, does hereby certify that she did serve the
Commonwealth's Motion upon the following person(s) in the manner disclosed:

Name:

Manner of Service

Clerk of Courts
400 S. 8th Street
Lebanon, PA 17042

Interoffice Mail


Judges' Chambers (CTJ)
400 S. 8th Street
Lebanon, PA 17042

Interoffice Mail

Ian Ehrgood
410 Chestnut Street
Lebanon, PA 17042

1st Class Mail

Date: 3.26.25



Amy Muller
Senior Deputy District Attorney

ORIGINAL

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	:	
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	:	
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AND NOW, to wit, this _____ day of March, 2025, upon the Motion of the Commonwealth, by and through the Office of the District Attorney of Lebanon County, it is hereby Ordered that the Commonwealth's Motion for Individual Voir Dire is hereby GRANTED and a Status Conference be held on the _____ day of _____, 2025

BY THE COURT,

_____, J.
CHARLES T. JONES

cc: Clerk of Courts
Office of the District Attorney
Ian Ehrgood