

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

ENTERED & FILED
CLERK OF COURTS
LEBANON, PA

2025 APR -4 A 11: 25

COMMONWEALTH OF PENNSYLVANIA : No. CP-38-430-2023
:
vs. :
:
VERONIKA RODRIGUEZ :
:

COMMONWEALTH'S MOTION FOR ADDITIONAL QUESTIONS JURY
INDIVIDUAL VOIR DIRE

In addition to the Standard Jury Questions and Questionnaire, the Commonwealth requests the following be asked of the jury pool in addition to the standard questionnaire:

1. The Defendant in this case is Veronika Rodriguez. The Defendant is charged with two counts of a Wiretap Act Violation and False Reports to Law enforcement. The Commonwealth intends to prove at trial that on January 8, 2023, the Defendant engaged in consensual sexual activity with the Victim Fahad Pervez. Defendant thereafter bragged about the sexual encounter and agreed to meet the victim for a second date on January 9, 2023. At the time of the sexual encounter, Defendant was an enlisted member in the National Guard. Victim was a Major, and thus a superior officer to the Defendant. Unbeknownst to the victim, Defendant had surreptitiously recorded multiple portions of their date, to include the sexual activity that occurred in the back seat of the Victim's Jeep. Defendant thereafter sent those recordings to other individuals. The victim cancelled the anticipated second date and made plans with Defendant to see each other again when he returned to the area for "drill" in March of 2023. On January 10, 2023, Defendant was confronted by a superior officer about being with the Victim. Only after being confronted

by a superior officer did the Defendant decide that this was a sexual assault. Defendant made a report to the Fort Indiantown Gap police on January 11, 2023.

- a. Is there anything about the basic facts of this case that would prevent you from being a fair and impartial juror?
 - b. Do you know the Victim, Fahad Pervez? If so, did you know him personally or professionally? Any familiarity you may have with the victim, would it prevent you from being a fair and impartial juror?
2. In recent months, the case received media coverage in the forms of television reporting, online reporting and social media interaction. Did you see accounts of this case on traditional media, social media or other internet forums?
 - a. If you have seen media coverage of the case, what media coverage have you seen?
 - b. How frequently have you seen media coverage?
 - c. Will you be able to set aside what you have already heard in the media and consider only the actual evidence which will be heard in the courtroom?
 - d. Can you assure this Court that you will not view additional media coverage of this case throughout the pendency of trial?
3. Many of our local citizens possess religious beliefs which make them unable to sit as a juror of, or in judgment of, a fellow citizen. Do you possess such religious beliefs?
4. The prosecutor in this case is Senior Deputy District Attorney Amy Muller. The prosecuting officers are Chief Devan Kramer and Officer Randall Czerviski. Do you know anyone from the prosecution? If so, do you know the member(s) personally or professionally?

- a. Is there anything about that relationship that would effect your ability to be fair and impartial throughout these proceedings?

5. The Defendant in this case is Veronika Rodriguez. Her lawyer is Ian Ehrgood.

- a. Does anyone know the defendant or her counsel?
- b. If so, do you know her personally or professionally?
- c. Have you ever utilized the law firm Ehrgood and Arnold? If so, how long ago? Do you have any ongoing professional relationship with the firm?
- d. Have you ever been sued or the subject of legal action wherein the opposite party was represented by the law firm of Ehrgood and Arnold? If so, how long ago? Is the legal matter finished?

6. Defendant was a member of the National Guard at the time of the complaint. Does anyone have any affiliation with the National Guard?

- a. Anything about that affiliation that would effect your ability to be fair and impartial?

7. If selected as a juror, you will need to listen to the recording evidence taken by the Defendant. Within that recording is the sexual activity that occurred between the Victim and Defendant. The audio recording will be somewhat graphic. You must view this evidence and listen to the testimony in order to render your ultimate verdict.

a. Are you able to view such evidence, understanding that it may be unpleasant?

8. Do you hold any animosity toward any police officer, police department, or the district attorney's office for any reason whatsoever?

Date:4/2/2025

A handwritten signature in black ink, appearing to read 'Amy Muller', written over a horizontal line.

Amy Muller
Senior Deputy District Attorney
Lebanon County District Attorney's Office

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CERTIFICATE OF SERVICE

Amy Muller, Senior Deputy District Attorney, does hereby certify that she did serve the Commonwealth's Individual Voir Dire Questions 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

Interoffice Mail

Date: 4/2/2025



Amy Muller
Senior Deputy District Attorney

ORIGINAL

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ORDER

AND NOW, to wit, this _____ day April, 2025, the Commonwealth's request to supplement the standard jury questionnaire utilized in *voir dire* is hereby GRANTED. The Commonwealth may ask said questions during jury selection in the Defendant's criminal jury trial.

BY THE COURT,

cc: Clerk of Courts
Office of the District Attorney (AM)
Ian Ehrgood, Esquire