

4. The jury's role in this case is very important, but limited. If the jury finds that Mr. Senefeld has violated the securities laws, it will be up to me to decide on the appropriate remedy. Would any of you find it difficult to decide the facts of this case without regard to the remedies which might be ordered if Mr. Senefeld was found liable?

In addition, the SEC requests that the parties be allowed the opportunity to follow up with individual jurors and ask additional questions, based upon their answers to the questions posed by the Court.

If the Court is not inclined to ask any of the foregoing questions, the SEC requests that it be allowed to ask those questions of the potential jurors during its portion of *voir dire*.

B. Questions by the SEC

In addition to the questions to be asked by the Court, the SEC respectfully requests the opportunity to ask each of the following questions of the potential jurors, either in a supplemental juror questionnaire, or during the SEC's portion of *voir dire*. (A copy of the SEC's proposed Supplemental Juror Questionnaire is attached hereto as Exhibit 1.) The parties have conferred about the SEC's proposal, and Mr. Senefeld does not object.

The SEC's proposed questions are as follows:

1. Do you support a political party or organization (if so, which one), or do you consider yourself independent?
2. Have any of you worked for the federal, state or local government? If so, in what capacity?
3. Have any of you ever worked in the securities or investment industry? If so, in what capacity?
4. Have any of you ever worked in farming or agriculture? If so, in what capacity?
5. Have any of you ever worked for a bank, finance company or lending institution (like a credit union)? If so, in what capacity?
6. Have you ever worked in advertising, marketing or sales? If so, in what capacity?

7. Have any of you ever worked in law or accounting? If so, in what capacity?
8. Do you consider yourself to be an experienced investor?
9. How often have you bought or sold securities (such as stocks, bonds, mutual funds or commodities), outside of your own retirement account(s) -- frequently, rarely or never?
10. When investing, do you typically rely on the advice and recommendations of a professional (like a broker, financial planner or investment adviser)? Please explain.
11. In general, have you (and/or your family members) had positive or negative experiences with investments? Please explain.
12. In general, do you have a favorable or unfavorable impression of stockbrokers, investment advisers, or others who work in the securities industry?
13. In general, do you have a favorable or unfavorable impression of lawyers?
14. Have you, or anyone close to you, felt cheated after losing money from an investment?
15. Are you familiar with the term "Ponzi scheme?" If so, what does this term mean to you?
16. If you, or anyone close to you, has had an unpleasant experience or dispute with a government agency (federal, state or local), please describe that experience or dispute and the outcome.
17. Some people feel that there is too much government oversight or regulation of the stock market and the securities and financial industries, while other fee there is too little. How do you feel?
18. Did you grow up in a farming community? If so, please describe how that experience has influenced your point of view.
19. Do you tend to read all of the emails you receive, including those on which you are copied or cc'd, or just the emails specifically addressed to you?
20. In financial matters, do you consider yourself to be a risk-taker, or more of a cautious person?
21. When hiring an expert or a professional to do a job, do you generally leave everything up to the expert?
22. Do you agree with this statement: "If a person doesn't ask the right questions while investing, or doesn't follow his or her investments carefully, then she or he is responsible for any losses."?

23. Are there any circumstances under which you think it would be appropriate to hold other members of a group responsible for the actions of one or two members? Please explain.
24. In general, do you believe that a person who is sued but settles the lawsuit before trial is probably guilty of what he or she was accused of doing? Please explain.
25. In criminal cases the government is required to prove its case “beyond a reasonable doubt.” However, in civil cases involving fraud the law only requires the SEC to prove its case by lower standard known as the “preponderance” (or greater weight) of the evidence. Do you believe this lower standard of proof in civil cases is fair and reasonable, or that the SEC should be required to prove its case beyond a reasonable doubt?

Dated: September 29, 2017

Respectfully submitted,

/s/Robert M. Moye

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CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2017, I served Tobin Senefeld with a copy of the foregoing Plaintiff's Proposed Voir Dire Questions by email and U.S. Mail, and filed a copy of the same via CM/ECF, which will notify all counsel of record.

/s/Robert M. Moya

Robert M. Moya

1) Name: _____

2) Do you support a political party or organization (if so, which one), or do you consider yourself independent?

3a) Do you, or does anyone close to you, have any education, training, or work experience in any of the following areas? [CHECK ALL THAT APPLY]

Federal, State, or Local Government

Securities or Investment Industry

Farming or Agriculture

Banking, Finance, or Lending (e.g., credit union)

Advertising, Marketing, or Sales

Law or Accounting

3b) If you have checked any of the above, please describe:

4) Do you consider yourself to be an experienced investor? Yes No N/A (I've never invested)

5a) How often have you bought or sold securities (such as stocks, bonds, mutual funds or commodities), outside of your own retirement account(s)?

Always Frequently Occasionally Never

5b) Please describe your investment experience (unless you answered "Never" to 5a):

6a) When investing, do you typically rely on the advice and recommendations of a professional (like a broker, financial planner or investment adviser)?

Yes No N/A (I've never invested)

6b) Why or why not (unless you answered "Never" to 6a):

7a) In general, have you (and/or your family members) had positive or negative experiences with investments?

Positive Negative N/A (never invested)

7b) Please explain (unless you answered "N/A" to 7a):

8) In general, do you have a favorable or unfavorable impression of stockbrokers, investment advisers, or others who work in the securities industry?

Extremely Favorable Extremely Unfavorable

Somewhat Favorable Somewhat Unfavorable

9) In general, do you have a favorable or unfavorable impression of lawyers?

Extremely Favorable Extremely Unfavorable

Somewhat Favorable Somewhat Unfavorable

10a) Have you, or has anyone close to you, ever felt cheated after losing money from an investment? Yes No

10b) If yes, please describe:

11a) Are you familiar with the term "Ponzi scheme?"

Yes No

11b) If yes, what does this term mean to you?

12a) Have you, or has anyone close to you, ever had an unpleasant experience or dispute with a government agency (federal, state, local)? Yes No

12b) If yes, please describe the experience and outcome:

13) Some people feel there is too much government oversight or regulation of the stock market and the securities and financial industries, while other fee there is too little. How do you feel?

Too much The right amount Too little

14a) Did you grow up in a farming community?

Yes No

14b) If yes, please describe how that farming experience has influenced your point of view:

15) Do you tend to read all of the emails you receive (including those on which you are copied or cc'd) or just the emails specifically addressed to you?

All emails, including those on which I'm copied/cc'd

Only those specifically addressed to me

16) In financial matters, do you consider yourself to be a risk-taker, or more of a cautious person?

Risk-Taker Cautious

17a) When hiring an expert or a professional to do a job, do you generally leave everything up to the expert?

Yes No

17b) Why or why not:

18) What are your feelings about this statement: "If a person doesn't ask the right questions while investing, or doesn't follow his or her investments carefully, then she or he is responsible for any losses."

Strongly Agree Somewhat Disagree

Somewhat Agree Strongly Disagree

19a) Are there any circumstances under which you think it would be appropriate to hold other members of a group responsible for the actions of one or two members?

Yes No

19b) Please explain your answer to 18a:

20a) In general, do you believe that a person who is sued but settles the lawsuit before trial is probably guilty of what she or he was accused of doing?

Yes No

20b) Please explain your answer to 19a:

21) In criminal cases the government is required to prove its case "beyond a reasonable doubt." However, in civil cases involving fraud the law only requires the SEC to prove its case by a lower standard known as the "preponderance" (or greater weight) of the evidence. Do you believe the lower civil standard of proof is fair and reasonable, or that the SEC should be required to prove its case beyond a reasonable doubt?

Fair/Reasonable Proof Beyond a Reasonable Doubt