

STATE OF SOUTH CAROLINA)
)
 COUNTY OF BERKELEY)
)
 STATE OF SOUTH CAROLINA,)
)
 Plaintiff,)
)
 -versus-)
)
 MICHAEL COLUCCI,)
)
 Defendant.)
 _____)

IN THE COURT OF GENERAL SESSIONS
 FOR THE NINTH JUDICIAL CIRCUIT
 WARRANT NO.: 2016A0810400692
 INDICTMENT NO: 2016-GS-08-02603

**DEFENDANT'S REQUESTED
 COURT VOIR DIRE**

2025 MAY 14 PM 12:38
 LEAH GUERRY-TURPIN
 CLERK OF COURT
 BERKELEY COUNTY, GA
 FILED
 GFB

Michael Colucci ("Colucci") having received the benefit of the venire's individual written responses to the Questionnaire now respectfully requests that the Court pose the following questions to the remaining venire:

1. The charge in this case is Murder. Knowing that the allegation is taking the life of another, would this interfere with your ability to serve as a fair and impartial juror in this case?
2. The trial of this case may last two weeks. Juror deliberations must not begin until the trial is completed, arguments are heard and I have had an opportunity to explain the applicable law. Knowing that, would you suffer any unusual or particular hardship due solely to the length of the trial if you are selected as a juror?
3. The selected jurors may be sequestered during the trial, which will require you to stay with your fellow jurors under the supervision of the Sheriff at a local hotel, and you may be permitted only minimal contact with your family, friends or business associates until a verdict is reached. Knowing that, would you suffer any unusual or particular hardship if you were selected as a juror?
4. Knowing the projected length of the trial of this case, do you anticipate any medical issues or conditions, or do you have personal, family or employment obligations, that may interfere with your service as a juror?

GS
 S-14-2625 ELO
 C: [Signature]
 E/M _____

5. Are you experiencing any medical, family or personal matters that might prevent you from giving your full attention to this case before a final resolution is reached?
6. The prosecutors in this case, Joel Kozak and Kinli Abee, are employed by the Attorney General's Office. (Mr. Kozak will introduce members of his staff). Do you know Mr. Kozak, Ms. Abee or any members of the Attorney General's staff?
7. The Attorney General's Office employs attorneys, investigators, paralegals and administrative personnel. Are you related to anyone in the Attorney General's Office?
8. Do you, a family member or a close friend have a relative employed by the Attorney General's Office?
9. Do you have a social or political relationship with any of the attorneys, investigators, their family members or employees of the Attorney General's Office?
10. This case has been investigated by the Berkeley County Sheriff's Office and the South Carolina Law Enforcement Division (SLED). Are you related to anyone in the Berkeley County Sheriff's Office or the South Carolina Law Enforcement Division?
11. Do you, a family member or a close friend have a relative employed by the Berkeley County Sheriff's Office or the South Carolina Law Enforcement Division?
12. Do you have a social or political relationship with any of the investigators, their family members or employees of the Berkeley County Sheriff's Office or the South Carolina Law Enforcement Division?
13. Michael Colucci is represented by attorneys Andrew J. Savage, III of the Savage Law Firm and Scott Bischoff and Bill McGuire of Adams & Bischoff. (Mr. Savage, Mr. Bischoff and Mr. McGuire will introduce members of their staffs.) Do you know Mr. Savage, Mr. Bischoff, Mr. McGuire or anyone employed with their offices? Have you had any business dealings with the Savage Law Firm or the Adams & Bischoff Law Firm?
14. (Ask Michael Colucci to stand). Michael Colucci is 55 years of age. Do you know him or any members of his family?
15. The following is a list of witnesses who may be called during the trial of this case. It is important to me to know if you know or recognize any of the following individuals. (The Court is requested to read a list of prospective witnesses including, name, age, occupation and community where they live. The Court is also requested to display their photograph.)

16. Have you read, heard or watched any form of media regarding Michael Colucci, Sara Colucci, their family members or their business(es)? This includes internet, social media, print media, pod casts, or any other form of media.
17. Have you participated in any discussions on the internet, commented, or expressed your opinion regarding the Colucci Jewelry store, its owners or employees?
18. Some of the events that will be described during the trial took place in 2015 at 2206 North Main Street in Summerville, South Carolina, near the intersection of North Main Street (Highway 17A) and Myers Road.
 - a. Are you familiar with this area as it appeared in 2015? Are you familiar with this area as it appears today?
 - b. Have you ever lived or worked in this area?
 - c. Do you pass by this area on Highway 17A or on Myers Road:
 - Daily?
 - Frequently?
 - Often?
 - Never?
19. It is not uncommon for media or people in the community to write or say things about a case that are not based in fact. All facts are determined from what you as a juror hear from witnesses who testify in court during trial. Have you read, heard or watched any form of media regarding the death of Sara Lynn Colucci? This includes internet, social media, print media, pod casts, or any other form of media.
20. Have you formed a belief about any of the facts surrounding the death of Sara Colucci as a result of what you have read, viewed, or heard from any source?
21. Based on what you have heard about this case, have you discussed the facts or expressed an opinion regarding Mrs. Colucci's manner of death (natural, accident, suicide, homicide or undetermined)?
22. This case has generated significant media coverage, and there will likely be television cameras in the courtroom. You are prohibited from speaking to the media during the course of this trial. You should not discuss with anyone what you see, hear, or observe in the courtroom until a final decision has been reached and announced by the Court. Would this heightened interest and media coverage affect your willingness to serve as a juror in this case?

23. Would this heightened interest and media coverage interfere with your ability to render a fair and impartial verdict?
24. Were you aware before coming to court today that you might be selected as a juror on this case?
25. Have you conducted any research or asked others about this case in anticipation of your jury service?
26. Have you discussed your possible selection as a juror in this case with anyone?
27. If yes, did you express an opinion or receive an opinion from others about the trial or your jury service?
28. Since being summoned as a juror, have you discussed this case or your role as a potential juror with any other member of the jury panel?
29. Do you know any fellow member of the jury panel?
30. Have you expressed an opinion to any member of the jury panel, or have you heard an opinion stated by any member of the jury panel, about this case?
31. Do you currently have an opinion about whether Sara Colucci died as a result of suicide, accident or homicide?
32. Do you have such strong feelings about the use of alcohol or drugs that you could not fairly weigh the evidence in a case wherein one or more of those involved has used or abused alcohol or drugs?
33. Do you feel that you can fairly decide a case that involves the State of South Carolina and a citizen accused of violating the law?
34. Do you have any concern that your verdict in this case, regardless of what it might be, will cause you or any family member, social or employment problems in the future?
35. Regardless of any opinions you may have concerning "how the law should be," would you be able to follow the law exactly as stated by the judge?
36. Do you know of any thoughts, bias or sympathy you have with reference to either Michael Colucci, Sara Colucci, or members of law enforcement, which would make it difficult for you to make a decision in this case?

37. Do you have any questions or concerns that the Court should know before we start selecting jurors?

Respectfully submitted,

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ATTORNEYS FOR MICHAEL COLUCCI

BY:



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Charleston, South Carolina

May 14, 2025