

JUROR NUMBER

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

UNITED STATES OF AMERICA,

v.

Cr.

DEFENDANT,

Defendant.

JUROR QUESTIONNAIRE

TO THE PROSPECTIVE JUROR:

The information which you give in your answers to this questionnaire will be used by the Court and the parties to select a qualified jury. Please answer each question as completely and accurately as you can. Your complete written answers will save a great deal of time for the Court, the parties and you. There are no right or wrong answers to the questions. In order to ensure that your answers are not influenced by the opinions of others, you should fill out the questionnaire by yourself without consulting or talking with any other person.

You must sign your questionnaire, and your answers will have the effect of a statement given under oath to the Court. What is needed is your very best, honest effort to answer the questions.

If you cannot answer a question because you do not understand it, write "Do not understand" in the space after the question. If you cannot answer a question because you do not know the answer, write "Do not know" in the space after the question. If you need extra space to answer any question, please use the extra blank sheets of paper included at the end of the questionnaire. Be sure to indicate on the blank page the number of the question you are answering. If there is a question the answer to which you would prefer to give the Court in private, please indicate that on the questionnaire in the space following the question by writing, "I wish to discuss answer with Judge."

Please write or print legibly using a black pen. If your answers are illegible, you may be required to re-copy your answers. Do not write on the back of any page.

After you leave today, you may not discuss any of the questions or your answers with anyone else, including your family. If anyone approaches you and attempts to learn about any aspect of the questionnaire, you may not answer their inquiries. If they persist, you should report this to the Court.

The sole purpose of this questionnaire is to encourage your full expression and honesty, so that both parties will have a meaningful opportunity to select a fair and impartial jury to try the issues in this case. Thank you for your full cooperation. It is of vital importance to the Court.

Juror Number _____

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

UNITED STATES OF AMERICA,

v.

Cr.

DEFENDANT,

Defendant.

Full Name: (Please print)

(Last)

(First)

(Middle Initial)

City or County of Residence _____ Zip Code: _____
(Borough of New York City, if applicable)

PRELIMINARY MATTERS

1. This trial is expected to last four to six weeks. Our best present estimate is that it should, in any event, end no later than July 24. The jury will hear evidence Monday through Thursday each week during the weeks that evidence is being presented. Consequently, during those weeks you will not have to come to court on Fridays. When the jury is deliberating and deciding on a verdict, however, the jury will sit on Fridays also. In addition, every reasonable effort will be made to accommodate the special needs of individual jurors.

Jury service is essential to the administration of justice. Accordingly, inconvenience will not be sufficient to excuse a prospective juror. To be excused a juror must show an unacceptable amount of personal hardship. In list of these considerations, would service as a juror in this case create an unacceptable hardship for you?

Yes ____ No ____

If yes, please explain in detail: _____

Whether or not you are claiming a hardship, please complete the rest of the questionnaire.

2. Do you have any medical condition that would make it difficult for you to serve as a juror? Yes ____ No ____

If yes, please explain: _____

3. Do you have any problem with your hearing or vision that would prevent you from giving attention to all of the evidence at this trial?

Yes ____ No ____

If yes, please explain: _____

4. Do you have any difficulty in understanding, speaking, or reading English?

Yes ____ No ____

If yes, please explain: _____

BACKGROUND

5. Date of Birth: _____

6. What is your current marital status? (Check all that apply.)

- Single
- Married ____ years
- Living with someone
- Separated
- Divorced
- Divorced and remarried
- Widowed
- Never Married

7. Who are the members of your household and for those who are employed, what kind of work do they do? (For example, simply list "medical receptionist," "bus driver," "lawyer," or "short order cook.")

<u>Relationship</u>	<u>Age</u>	<u>Employment</u>

8. Do you have any children who do not reside with you?

Yes ____ No ____

If yes, please provide the following information:

<u>Sex</u>	<u>Age</u>	<u>Employment</u>

RESIDENCE

9. How long have you lived at your current address? _____

10. In what other cities or towns have you lived for the past ten years and when did you live there? (Please note if these places are in another state or country.)

EDUCATION

11. How far did you go in school, and what was your major field of study if you went to college or graduate school?

12. Have you or your spouse/partner ever had any training in the law?
Yes _____ No _____

If yes, who had the training and what kind of training was it? _____

13. Have you or your spouse/partner taken any psychology or counseling courses?
Yes _____ No _____

If yes, who took the courses and what were they? _____

EMPLOYMENT

14. What is your occupational status? (Check all that apply.)

- Work full-time outside the home
- Work part-time outside the home
- Full-time homemaker
- Homemaker with part-time employment
- Volunteer full-time with charitable organization
- Volunteer part-time with charitable organization
- Unemployed-looking for work
- Unemployed-not looking for work
- Student
- Retired
- Disabled
- Other _____

(Please specify)

15. What is the name of your employer? (If you are retired, describe the last position you held.)

In what city or county or borough is the office in which you work (worked) located?

Describe what you do (did): _____

16. How long have (had) you worked for this employer? _____

17. If you have worked for your current employer for less than ten years, list the other types of jobs you have held over the past ten years and the approximately length of time you worked at each job. (Again, simply list, "medical receptionist," "bus driver," etc.)

Employment

Dates

a. _____

b. _____

c. _____

d. _____

e. _____

ACTIVITIES

18. What are your principal leisure time activities?

19. List any civic, social, political or professional organizations to which you belong.

20. Do you watch or listen to a television or radio news program on a regular basis?
Yes _____ No _____

If yes, please list each such program:

21. What newspapers or magazines do you read regularly?

22. Have you or any member of your immediate family ever owned a gun or belonged to any kind of anti-gun or pro-gun club or organization?

Yes _____ No _____

If yes, please explain: _____

MILITARY

23. Have you ever been in the United States military (including the military reserves, National Guard or ROTC)?

Yes _____ No _____

If yes, list branch, rank, and date of service.

24. Were you ever in the military police or shore patrol?

Yes _____ No _____

25. Did you receive an honorable discharge? Yes _____ No _____

If no, please explain: _____

LAW ENFORCEMENT OR LEGAL CONTACTS

26. Have you, or has any member of your family or a close friend ever been employed in law enforcement or had law enforcement experience of any kind? Examples include: police, sheriff, security guard, FBI agent, investigator, District Attorney, United States Attorney, probation officer, prison or jail employee, etc.
Yes ____ No ____

If yes, please identify your relationship with the person, the type of organization, and their title.

<u>Person</u>	<u>Organization</u>	<u>Title</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

27. Do you believe that you will give the testimony of a law enforcement officer either more or less weight than the testimony of other witnesses simply because the witness is a law enforcement officer?
Yes ____ No ____

28. Have you or has any member of your family or a close friend ever belonged to a neighborhood crime watch program, or auxiliary or police reserve law enforcement branch? Yes ____ No ____

If yes, what is/was the extent of your/their participation?

29. Have you or has any member of your family or a close friend ever belonged to a (crime) victim's rights organization, or assisted the work of such an organization?
Yes ____ No ____

If yes, what is/was the extent of your/their participation?

30. Have you or has any member of your family or a close friend ever been audited by or had a dispute with any agency or department of the United States Government (including the IRS, Social Security Administration, Veterans Administration, etc.) or any city or state government agency?
Yes _____ No _____

a. If yes, briefly explain what happened: _____

b. Do you think you, your family member, or close friend were treated fairly?
Yes _____ No _____

31. Do you have any relatives or close friends who are employed in the court system as judges, magistrates, law clerks, clerks or other court personnel?
Yes _____ No _____

If yes, please explain: _____

32. Do you have any relatives or close friends who work as private criminal defense attorneys, public defenders, legal aid lawyers, or who are involved in criminal defense work?
Yes _____ No _____

If yes, please explain: _____

33. Do you have any relatives or close friends who work as District Attorneys, Assistant District Attorneys, U.S. Attorneys, Assistant U.S. Attorneys, or who work as a prosecutor?
Yes _____ No _____

If yes, please explain: _____

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34. Have you, or has anyone in your immediate family, ever sued someone or been sued by anyone?
Sued ____ Been sued ____ No ____

If you or an immediate family member have sued someone or been sued, please explain the nature of the lawsuit:

35. Have you or has any member of your family or a close friend ever been the victim of any kind of crime, whether it was reported to law enforcement authorities or not (including domestic violence, spousal abuse, robbery, burglary, assault, sexual assault, etc.)?
Yes ____ No ____

If yes, please describe each incident:

a. _____

b. _____

c. _____

36. Have you ever appeared in court or in any grand jury proceeding, as a plaintiff, defendant, victim, or witness for any reason?
Yes ____ No ____

If yes, please state when and explain why: _____

37. Have you or has any member of your family or a close friend ever been arrested for, accused of, charged with, or convicted of any crime, (including domestic violence, spousal abuse, narcotics, or assault) or been the subject of a criminal investigation?

Yes _____ No _____

If yes, please state the person, date, crime, who brought the charges and the outcome:

38. Do you believe that you, any member of your family or a close friend has ever been treated unfairly or been the victim of misconduct by the local or state police or federal law enforcement authorities, including the Federal Bureau of Investigation?

Yes _____ No _____

If yes, please explain: _____

JURY SERVICE AND THE LAW

39. Have you ever served on a jury? Yes _____ No _____

If yes, please state, for each case:

<u>Year</u>	<u>Civil or Criminal</u>	<u>Charges or Type of Case</u>	<u>Did the Jury Deliberate?</u>	<u>If it did Deliberate, Did it Reach a Verdict?</u>
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_____	_____	_____	Yes _____ No _____	Yes _____ No _____
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____ _____ _____ Yes ____ No ____ Yes ____ No ____
____ _____ _____ Yes ____ No ____ Yes ____ No ____
____ _____ _____ Yes ____ No ____ Yes ____ No ____

40. Have you ever served on a grand jury?

Yes ____ No ____

If yes, please state when, where and for how long you served on a grand jury:

41. If you have served on a jury or grand jury before, is there anything about your past service that would make it difficult for your to sit as a juror in this case?

Yes ____ No ____

If yes, please explain: _____

42. Do you have any political, moral or religious beliefs that would prevent you from passing judgment on another person?

Yes ____ No ____

If yes, please explain: _____

43. Under the law, a defendant need not testify or produce any evidence. The burden of proof is always on the Government. If the defendant does not testify, the jury may not consider that fact in any way in reaching a decision. Would you have any difficulty following this rule of law?

Yes ____ No ____

44. Every defendant is presumed innocent and cannot be found guilty unless the jury, unanimously and based solely on the evidence in the case, decides that his guilt has been proven beyond a reasonable doubt. Would you have any difficulty following this rule of law?

Yes ____ No ____

45. If you are selected as a juror in this case, will you have any difficulty basing your decision on whether the defendant is guilty or not guilty solely on the evidence or lack of evidence presented to you during trial, and without regard to bias, prejudice, suspicion, or sympathy?

Yes ____ No ____

46. Do you have any ideas or prejudices that would hinder you from following the instructions that I will give as to the law?

Yes ____ No ____

ADDITIONAL QUESTIONS

47. Do you have any experiences, attitudes, or opinions involving fire which you believe would interfere with your ability to be a fair and impartial juror in this case?

Yes ____ No ____

If yes, please explain: _____

48. Do you have any experience, attitudes, or opinions regarding the physical abuse of women which you believe would interfere with your ability to be a fair and impartial juror in this case?

Yes ____ No ____

If yes, please explain: _____

49. If there is evidence in a trial of child abuse, domestic violence, or stalking, do you believe that would interfere with your ability to be a fair and impartial juror in that case? Yes ____ No ____

If yes, please explain: _____

50. Do you have any experiences, attitudes, or opinions regarding illegal drug trafficking which you believe would interfere with your ability to be a fair and impartial juror in a case which includes evidence of illegal drug trafficking?
Yes ____ No ____

If yes, please explain: _____

51. The defendant in this case, _____, is an African-American. Is there anything in your past experience or present belief that leads you to question your ability to be a fair and impartial juror in a case in which the defendant is an African-American? Yes ____ No ____

If yes, please explain: _____

52. You may hear the names of the certain individuals during the trial. Please look carefully at the list of names attached at the end of this questionnaire at this time and **circle** any name that is familiar to you in any way.

53. The prosecutors in this case are _____ and _____ of the United States Attorney's Office for the Southern District of New York. The head of this United States Attorney's Office is _____. Do you know or have you ever had any contact with these attorneys, their Office or anyone working in that Office?
Yes ____ No ____

If yes, please explain: _____

54. The defendant, _____, is represented by attorneys _____, _____, and _____ . Do you know or have you had any contact with the defendant, these attorneys, their law practices or anyone working with them?

Yes ____ No ____

If yes, please explain: _____

55. Do you know the Judge, _____? Yes ____ No ____

If yes, please explain: _____

56. Do you have any personal knowledge of the charges in this case as I have described them? Yes ____ No ____

57. If you have heard of or read anything about the abduction of _____ from Connecticut and the setting of fire to her car with her in the trunk in Manhattan on March 11, 1997, please indicate where you heard or read about it and describe what you have seen, read or heard about the incident:

CONCLUSION

58. Is there any matter not covered by this questionnaire that you think the attorneys or Court might want to know about you when considering you as a juror in this case? Yes _____ No _____

If yes, please explain: _____

59. Do you know of any reason whatsoever why you cannot sit as a fair and impartial juror in this case? Yes _____ No _____

If yes, please explain: _____

I, _____ declare under penalty of perjury
(print name)

that the foregoing answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, or received assistance in completing the questionnaire.

Signed this _____ day of June, 1998.

(Signature)

Thank you for your help

We realize that we have imposed on your time in responding to this questionnaire, and we thank you for your attention and honesty in its completion. We assure you that it will assist the Court in selecting a fair and impartial jury, and doing so in the fastest possible manner. Thank you for your time.