

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

STATE OF IDAHO,

Plaintiff,

vs.

BRYAN C. KOHBERGER,

Defendant.

Case No. CR01-24-31665

JURY QUESTIONNAIRE

1 **Your Full Name (including aliases):** _____

2 **Date of Birth:** _____

3
4 The purpose of this questionnaire is to allow the Court and the parties in this case to select a jury
5 as quickly and efficiently as possible.

6 This questionnaire seeks to help the Court and all parties efficiently obtain information related to
7 your ability to serve as a neutral juror for the trial listed on the cover page. The process of jury selection for
8 this trial will happen in two stages. The first stage entails completing of this questionnaire. The second
9 stage includes answering questions in person. The use of this questionnaire is to help shorten the process
10 of selecting the jury overall.

11 Please answer each question to the best of your ability. There are no “right” or “wrong” answers.
12 The Court seeks information about your experiences, knowledge or feelings. Please provide honest,
13 accurate, and complete answers to each question to help us with jury selection in this particular case.

14 No one, including Court staff can help you answer these questions. If you do not know the answer
15 to a question, write “don’t know.” If you do not understand a question, write “don’t understand.” If you
16 find that there is not enough time or room for you to completely answer a question, write “incomplete
17 answer.”

18 There are pages to this questionnaire, including the cover page. In the upper right hand corner
19 of all the pages there is a space for you to indicate your juror card number that appears on the cover page.
20 Please fill that information in on each page. **If you need more room, extra pages are provided.**

21 **After you leave today, you may not discuss any of the questions or your answers with anyone**
22 **else, including spouse, children, or other members of your immediate family. Do not personally**
23 **investigate this case or look information or news about it by using any outside source of information,**
24 **including the internet. YOU WILL BE REQUIRED TO SWEAR UNDER OATH, SUBJECT TO**
25 **PERJURY AND CONTEMPT OF COURT, THAT YOU HAVE NOT VIOLATED THESE**
26 **INSTRUCTIONS.** If anyone approaches you and attempts to learn about any aspect of the questionnaire,
27 or this case, you may not answer their inquiries. If they persist, you **must** report this to the Court.
28 **YOU SHOULD NOT DISCUSS THIS CASE WITH ANYONE.**

1 UNDER THE PENALTY OF PERJURY I DO SWEAR OR AFFIRM THAT THE ANSWERS TO
2 THE FOLLOWING QUESTIONS ARE TRUE.

3 Full Name:

4 _____
5 (Last) (First) (Middle Initial)
6

7 Juror No. _____
8

9 PART I. GENERAL BACKGROUND

- 10 1. What is your gender? _____
- 11 2. Are you a citizen of the United States? _____
- 12 3. Are you at least 18 years of age? _____
- 13 4. What is your birth date? _____
- 14 5. Please list other names you have used: _____
- 15 6. Are you a resident of Ada County? _____ How long? _____
- 16 7. Do you have difficulty reading, speaking, or understand the English language? _____

17 If "yes," please explain.

- 18 _____
- 19 8. Idaho law provides that nursing mothers can have their jury service postponed until they are no
20 longer nursing. Are you a nursing mother who would like to have your jury service postponed?
21 Yes _____ No _____

- 22 9. Have you lost the right to vote because of a criminal conviction? _____

- 23 10. What is your current marital status? (circle one that applies)

24 Single Never married Married _____ years
 25 Separated Widowed Living with partner _____ years
 26 Divorced Remarried

- 27 11. Do you have any children? Yes _____ No _____ How many? _____

- 28 12. If your answer was "yes" to question No. 12, please provide the following information:

29 Sex Age Highest Education Obtained Occupation

30 _____
 31 _____
 32 _____
 33 _____

- 34 13. How long have you lived at your current residence? _____

35 a. Do you rent or own? _____

1 14. If there are any other adults, other than your spouse/partner, living in your home, please state their
2 occupation. If they are not presently employed, please state if they are a homemaker, unemployed,
3 retired, disabled, student, etc.

<u>Name</u>	<u>Age</u>	<u>Occupational Status</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

8 15. Do you routinely contribute service or money to, or actively support, any civic or charitable
9 organization?

10 Yes _____ No _____

11 Please describe.

12 _____
13 _____

14 16. Have you or your spouse/partner ever sought assistance from, donated money to, and/or worked
15 for the American Civil Liberties Union (ACLU), Amnesty International, or a similar organization
16 that advocated for criminal justice reform or civil rights of criminal defendants?

17 Yes _____ No _____

18 If "yes," then when, and for what organization?

19 _____
20 _____

21 17. Have you or your spouse/partner ever sought assistance from, donated money to, and/or worked
22 for a neighborhood crime watch program, a crime stoppers group, the Fraternal Order of Police, or
23 other organization that supports or advocates for criminal prosecutions, crime victim's rights, or
24 law enforcement organizations?

25 Yes _____ No _____

26 18. Have you, your spouse/partner, a relative or close friend ever sought assistance from, donated
27 money to, and/or worked for any group or association that favors jury nullification (refusing to
28 follow the law because of a disagreement with the law?

29 Yes _____ No _____

30 If "yes," then when, for what organization, and what is/was the extent of your/their participation?

31 _____
32 _____

19. Have you or any member of your immediate family ever belonged to a (crime) victim’s rights organization, or supported the work of such an organization? Yes _____ No _____

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

20. Have you or any member of your immediate family been part of an advocacy or political lobby group focusing its efforts on tougher criminal laws or punishment, or victim’s rights?

YES _____ NO _____

If yes please identify the organization(s) you have supported.

—

21. Do you have any medical issues, such as vision problems, hearing problems, or any other current physical or mental health concerns that would make it difficult for you to serve as a juror? Jury Service in this case will require you to be available and in court from 8:30 – 3:30 daily for a period of 3 months.

Yes _____ No _____

If you have such an issue, please briefly state the nature of it, the limitations it imposes that would affect your ability to serve as a juror:

Are there accommodations that the Court can provide that would make jury service possible (e.g. more frequent breaks, or the ability to stand and stretch during trial, etc.):

Yes _____ No _____

If yes, please explain:

22. Are you presently taking any form of medication that could interfere with your ability to serve as a juror? If so, please list the medications you are taking, the reasons for taking them, how often you take them (e.g., every 4 hours) and how the medication impacts your ability to serve as a juror (e.g., makes me drowsy or clouds my thinking):

Medication Reason for Taking How Often Taking How it Interferes

PART II. EMPLOYMENT HISTORY

22. Have you ever served in the armed forces? Yes _____ No _____

a. Branch of service and highest rank. _____

b. Dates and places of service. _____

c. Are you a combat veteran? Yes _____ No _____

23. What is your occupational status? (Mark X next to those that apply)

_____ Work full-time. Where: _____

_____ Work part-time. Where: _____

_____ Full-time work as household manager (Homemaker)

_____ Household manager/Homemaker with outside part-time employment. Where: _____

_____ Volunteer full-time with charitable, educational, religious or other nonprofit organization.

Where: _____

_____ Volunteer part-time with charitable, educational, religious or other nonprofit organization.

Where: _____

_____ Unemployed—looking for work

_____ Full-time student. Where: _____

_____ Part-time student. Where: _____

_____ Retired. From where: _____

_____ Other. (Please explain) _____

24. What is your current occupation/job title (if applicable)? _____

25. Who is your current employer? _____

26. For the past 10 years, please list your employers/occupations prior to your current employer/occupation and approximate years of employment: _____

27. Are you know, or have you ever been a supervisor? YES _____ NO _____

27. Have you ever studied or received any training or had any experience in the following: law, criminology, law enforcement, criminal forensics, data forensics, science, medicine, genetics, vehicle identification (circle those that apply).

If yes to any of the above, please explain: _____

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28. What is your spouse/partner’s current occupational status, occupation, current job title, and/or employer? If not currently employed, please state what they did and for whom they were previously employed.

29. Have you, your spouse/partner or any immediate family member, or close friend been employed by any of the following? **(Mark X to all that apply)**
- _____ The University of Idaho (any campus)
 - _____ Federal law-enforcement agencies (FBI, ATF, DEA, Secret Service, etc.)
 - _____ Latah County Sheriff’s Department
 - _____ Moscow City Police
 - _____ Ada County Sheriff’s Office
 - _____ Idaho State Police
 - _____ Pennsylvania State Police
 - _____ Idaho State Forensic Lab
 - _____ Idaho State Police Crime Laboratory
 - _____ Any other State, County or City Law-Enforcement Agency
 - _____ Private Investigation Agency
 - _____ Forensic Examiner (Coroner’s Office)
 - _____ Spokane County Medical Examiner
 - _____ Latah County Coroner, Cathy Mabutt (or her law firm)
 - _____ Latah County Prosecutor’s Office
 - _____ Any Prosecuting Attorney’s Office
 - _____ Idaho Attorney General
 - _____ Criminal Defense Law Firm/Attorney
 - _____ Public defender’s office (state or federal)
 - _____ Court (state or federal)
 - _____ Television/Radio, Publishing, Podcasts, YouTube/Other Social Media Platforms, Documentary or other media productions related to real crime programming. (This includes hosting or regularly participating in podcasts, youTube channels and the like.

1 If so, please state who, when and what their job was/is. _____
2 _____
3 _____

4 **PART III. EDUCATION**

5 30. Identify your highest educational level:

- 6 _____ Professional Education (e.g. Law, Medicine)
- 7 _____ graduate school
- 8 _____ college graduate
- 9 _____ some college: Number of years attended _____
- 10 _____ trade school
- 11 _____ high-school graduate
- 12 _____ GED/HSE
- 13 _____ grade school

14 31. If you did not complete high school, how many years of school did you attend? _____

15 32. Where did you attend? _____

16 33. Degrees Attained? _____

17 34. Area(s) of concentration: _____

18 35. Are you a student now? Yes _____ No _____

19 a. Name of School: _____

20 b. Grade or Level: _____

21 c. Area of concentration: _____

22 **PART IV. GENERAL ATTITUDES AND KNOWLEDGE OF THE LAW**

23 **36.. Presumption of Innocence**

24
25 One of the fundamental principles of our legal system is that when a person is charged with a
26 crime, he must be presumed to be innocent. This presumption of innocence is only overcome if
27 the prosecution presented enough evidence to convince you beyond a reasonable doubt that he is
28 guilty.

29 If you are selected as a juror in this case, will you have any difficulty accepting and/or applying
30 the rule of law that _____ must be presumed to be innocent?

31 YES: _____ NO: _____

32 **37 Burden of Proof**

1 The State/prosecution, has the burden of proving that _____ is guilty beyond a
2 reasonable doubt. This burden never shifts to the defense. The defendant never has to prove that
3 he is innocent. No defendant is ever required to testify. A defendant is not required to present
4 any evidence. If the prosecution does not prove every element of an offense beyond a reasonable
5 doubt, the jury must find the defendant not guilty of that offense.

6 a. Do you understand this legal principle?

7 YES: _____ NO: _____

8 b. Will you follow this legal principle?

9 YES _____ NO _____

10 Do you foresee any difficulty in applying this legal principle?

11 YES _____ NO _____

12 38. Under our Constitution, a defendant in a criminal case has the right to remain silent. A defendant is
13 not required to testify or to present any evidence at all.

14 a. Do you feel that a defendant should be required to testify? Yes ____ No ____

15 b. In many cases, a defendant, with the advice of their attorney, may choose to not testify.
16 There are a variety of reasons this decision may be made. If this happens, do you believe it
17 means that the defendant is probably guilty or has something to hide?

18 Yes ____ No ____

19 c. If Mr. Kohberger does not testify will you agree NOT to speculate as to the reason?

20 YES _____ NO _____

21 d. If Mr. Kohberger does not testify will you be able to presume his is innocent?

22 YES _____ NO _____

23 e. If the defendant exercises his Constitutional right to remain silent and does not testify, the
24 jury will be instructed that they may not use his silence as evidence of guilt and the jury may
25 not even discuss the fact the defendant did not testify. Can you follow this instruction and
26 not consider the defendant's silence as an indication of guilt?

27 Yes ____ No ____

28 37. Under our law, the jury is required to follow the law that the judge gives them in the jury instructions,
29 even if the jury thinks the law is a bad or they disagree with it.

30 a. If selected for the jury, will you follow the law given in the jury instructions?

31 Yes ____ No ____

1 b. Do you feel that the jury should be free to disregard the law given in the jury instructions
2 if they disagree with that law? Yes ____ No ____

3 38. Do you hold any religious, philosophical or moral belief that you believe would make it impossible
4 to sit in judgment of facts related to another or to render a fair and impartial verdict?

5 Yes ____ No ____

6 If "yes," please explain. _____
7 _____
8 _____

9 39. Have you, your spouse/partner or other close family member, or a very close friend, ever been the
10 victim of a violent or otherwise serious crime (reported or *unreported*)? Yes ____ No ____

11 If "yes," please explain briefly. _____
12 _____
13 _____

14 a. Was anybody arrested or prosecuted? _____

15 b. What was the outcome? _____

16 c. Do you feel that justice was served? Yes ____ No ____

17 d. Can you set aside what happened to you or your family member/friend and decide the current
18 case based only on the evidence you receive in trial and the law the judge tells you to follow?

19 Yes ____ No ____ . If No, please explain: _____
20 _____

21 40. Have you, a member of your family, or a close friend ever been charged with a felony or serious
22 misdemeanor criminal offense (e.g. DUI, domestic violence, assault/battery)?

23 Yes ____ No ____

24 a. Briefly describe the charges, the circumstances leading up to the charges, what agency
25 prosecuted the case and the outcome?

26 _____
27 _____
28 _____

29 b. Do you feel that justice was served? Yes ____ No ____

30 c. Do you feel that you or your family member/friend were treated fairly? Yes ____ No ____
31 If No, please explain why you believe you were treated unfairly: _____

32 _____
33 _____
34 _____

35 d. Do you harbor any ill feelings toward law enforcement, prosecutors or the courts?
36

Yes ___ No ___

e. Can you set aside what happened to you or your family member/friend and decide the current case based only on the evidence you receive in trial and the law the judge tells you to follow? Yes ___ No _____. If No, please explain: _____

41. Have you or a close family member or close friend ever been an inmate in any type of penal institution? Yes ___ No ____

If your answer is "yes," please explain who in relation to yourself and for what offense this person was imprisoned and when this occurred.

42. Do you have any experiences with or opinions about law enforcement officers, whether positive or negative, that might impair your ability to impartially evaluate the testimony of an officer during this trial? Yes ___ No ____

If "yes," please describe. _____

43. Have you ever been selected to serve on a trial jury. Yes ___ No _____. For each time previously selected as a trial jury (i.e. where you actually sat through the trial and listened to the evidence) state:

a. When? _____

b. Where (which Court called you for jury duty)? _____

c. Was it a civil or criminal case? _____

d. Describe the case briefly.

e. Was the case submitted to the jury for deliberations? Yes ___ No ____

f. Did you participate in the deliberations? Yes ___ No ____

g. Did the jury reach a verdict? Yes ___ No ____

h. Were you the Foreperson? Yes ___ No ____

44. The evidence in this case may include graphic testimony, videos, and photographs of the crime scene and the victims, as well as possibly autopsy photos. Do you believe the potential exposure to such

1 graphic evidence may prevent or make it impossible for you to serve as a juror in this case?

2 Yes _____ No _____

3 If yes, please explain: _____

4 _____

5 _____

6 45. The evidence in this case may include testimony about Autism Spectrum Disorder, Obsessive
7 Compulsive Disorder, Attention Deficit Hyperactivity Disorder, and Eating Disorders.

8 Do you have a strong opinion about hearing that kind of evidence? Yes _____ NO _____

9 a. If YES, what is that opinion _____

10 b. Which disorder? _____

11 c. Are you familiar with Autism? Yes _____ NO _____

12 d. Have you, or a family member or close friend been diagnosed with any of the disorders listed
13 above? Yes _____ NO _____

14 46. The evidence in this case may include Expert testimony. Do you have a strong opinion about Expert
15 witnesses? Yes _____ No _____

16 a. If Yes, please explain what your opinion is?

17 _____

18 _____

19 _____

20 45. The Jury will decide whether or not the State has proven the Defendant is guilty beyond a reasonable
21 doubt. The Judge will instruct the Jury on the law applicable to this case and it is the Jury's duty to
22 follow the law as given by the Judge. Will you follow the instructions upon the law given by the
23 Judge even if you thought the law should be different or disagree with the law as instructed by the
24 Judge? Yes _____ No _____

25 If you answered "No" please explain your answer.

26 _____

27 _____

28 **V. ATTITUDE REGARDING THE DEATH PENALTY**

30 46. In this case, the State has filed a notice of intention to seek the death penalty. This means
31 that if, and only if, Mr. Kohberger is found guilty of first degree premeditated murder there will
32 be a separate trial known as a sentencing proceeding. During this sentencing proceeding, other
33 evidence may be presented to the jury. You are not to draw any conclusions about why you are
34 being asked questions about the death penalty before this trial has commenced. Do not think that

1 anyone has determined that a sentencing proceeding will be required or that Mr. Kohberger will
2 be found guilty of any offense. This is very important.

3 If the defendant is convicted of first degree murder, the same jury that determined guilt may be
4 asked to determine the appropriate sentence in a separate proceeding. In the sentencing phase of
5 the case, the prosecution is required to establish the existence of an aggravating circumstance(s),
6 which the prosecution asserts support the death penalty. On the other hand, the defense will
7 present mitigating circumstances to the jury, which the defense asserts support a penalty of life
8 imprisonment. Aggravating circumstances are factors set out by statute and alleged by the State
9 in support of a death sentence. Mitigating circumstances are anything about the defendant or the
10 facts of the case that, in fairness or mercy, indicate that a sentence other than death is
11 appropriate. If you find the defendant guilty, the alternative to the death penalty is a sentence of
12 life imprisonment.

13

14 Are you opposed to discussing your viewpoint about the death penalty with the parties during Voir
15 Dire? YES _____ NO _____

16 Do you feel the death penalty is used:
17 _____ Too often _____ Too seldom _____ Don't know

18 Please explain. _____
19 _____
20 _____

21

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24 47. Have you ever actively supported any measure to modify, reinstate or abolish the death penalty in
25 Idaho or in any other state in which you have resided?

26 Yes _____ No _____

27 If your answer was "Yes," please explain: _____

28 48. Have you participated in Idaho legislative process regarding any aspect of the death penalty including
29 how Idaho carries out the death penalty? YES _____ NO _____

30 48.

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34 **PART VI. KNOWLEDGE OF THE CASE**

35 53. Are you, your spouse/partner or any members of your immediate family, household, or any of your
36 close friends **in any way involved with:**

- | | | | |
|----|---|-----------|----------|
| 1 | The Latah County Prosecuting Attorney’s Office | Yes _____ | No _____ |
| 2 | The Idaho Attorney General’s Office | Yes _____ | No _____ |
| 3 | Any Criminal Defense Attorneys | Yes _____ | No _____ |
| 4 | The Latah County Sheriff’s Office | Yes _____ | No _____ |
| 5 | The Moscow City Police | Yes _____ | No _____ |
| 6 | The Idaho State Police | Yes _____ | No _____ |
| 7 | The FBI | Yes _____ | No _____ |
| 8 | The Pennsylvania State Police | Yes _____ | No _____ |
| 9 | The Latah County Coroner’s Office | Yes _____ | No _____ |
| 10 | Idaho State Forensic Lab | Yes _____ | No _____ |
| 11 | Idaho State Police Crime Laboratory | Yes _____ | No _____ |
| 12 | Any Latah County Judges | Yes _____ | No _____ |
| 13 | Any Ada County Judges | Yes _____ | No _____ |
| 14 | Any Idaho Federal Judge | Yes _____ | No _____ |
| 15 | The Ada County Clerk of the Court’s Office | Yes _____ | No _____ |
| 16 | The Latah County Clerk of the Court’s Office | Yes _____ | No _____ |
| 17 | Any Court Personnel Who Work in Ada or Latah County | | |
| 18 | (e.g., court reporters, clerks) | Yes _____ | No _____ |
| 19 | The Idaho Department of Corrections | Yes _____ | No _____ |

20 If your answer to any of these is yes, please explain, including who the person is, where the person
 21 works, to your knowledge, what the person does for their work, and whether you discuss their jobs
 22 with them, etc.

23 _____
 24 _____
 25 _____
 26 _____

27
 28 **54. Do you know:**

- | | | | |
|----|---|-----------|----------|
| 29 | The Defendant, Bryan C. Kohberger | Yes _____ | No _____ |
| 30 | <u>Attorneys:</u> | | |
| 31 | William W. Thompson, Jr., Jeffery Nye | Yes _____ | No _____ |
| 32 | Ashley Jennings, Anne Taylor, Elisa Massoth | Yes _____ | No _____ |
| 33 | Jay Logsdon, Bicka Barlow | Yes _____ | No _____ |
| 34 | <u>Victims:</u> | | |

1 Madison Mogen or her family members Yes _____ No _____

2 Kaylee Goncalves or her family members Yes _____ No _____

3 Ethan Chapin or his family members Yes _____ No _____

4 Xana Kernodle or her family members Yes _____ No _____

5 If your answer to any of these is yes, please identify who the person is and how you know them.

6 _____

7 _____

8 _____

9 _____

10
11 55. What have you heard or what do you know about this case?

12 _____

13 _____

14 _____

15 _____

16 _____

17 56. Have you discussed this case with anyone? YES _____ NO _____

18
19 56. Have you watched, read, or followed media concerning the State of Idaho vs. Bryan C. Kohberger
20 case?

21 Yes _____ No _____

22 If Yes, what media did you follow, i.e., news reports, social media, documentaries, true crime
23 television programs, YouTube channels, or podcasts)?

24 _____

25 _____

26 _____

27 _____

28 57. Have you donated funds to any person or family impacted or associated with this case?
29 YES _____ NO _____

30
31 57. If you did follow this case, has that caused you to already form an opinion regarding the guilt or
32 innocence Bryan Kohberger in this case? Yes _____ No _____

33
34 58. _____

1 Do you have an opinion about Mr. Kohberger’s Innocence or Guilt? YES _____ NO _____

2 What is that opinion?

3 _____

4 _____

5 Have any of your close friends or family discussed this case with you and shared their opinions?

6 YES _____ NO _____

7 How much value do you place on these opinions that have been shared with you?

8 NONE _____

9 SOME _____

10 MUCH _____

11 I WOULD NOT GO AGAINST THESE OPINIONS _____

12 59. If do not hear evidence during trial about information you have heard from media or other sources
13 prior to

14 the trial (or hear evidence that differs from what you heard from sources outside of trial), could you
15 set aside those “facts” you heard outside of the trial and rely only on the evidence presented during
16 trial when deciding about the case as a juror?

17 Yes _____ No _____

18 If you answered “No,” please explain. _____

19 _____

20 _____

21 60. The following people *may* be called as witnesses to testify in this case.

22 **PLEASE CIRCLE THE NAME OF EACH WITNESS YOU KNOW.**

[List all witnesses]

23 _____ None of the witnesses listed are familiar to me

24 **If you have circled any of the persons preceding these names, describe how you know that**
25 **person and the nature of your relationship? IDENTIFY THE PERSON BY NAME. Use extra**
26 **sheets, if necessary.**

27 _____

28 _____

29 _____

30 _____

31 _____

1 a. Could your knowledge of any of these individuals prevent you from acting impartially in this
2 case? Yes _____ No _____

3 If you answered "yes," please explain. _____
4 _____
5 _____
6 _____
7 _____

8 b. Could your knowledge of any of these individuals cause you to give either greater or lesser
9 weight to any testimony such person(s) may give in this case?

10 Yes _____ No _____
11 If you answered "yes," please explain. _____

12 _____
13 _____
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16 61. Has anyone (friends, family, work colleagues etc.) talked with you this case?

17 Yes _____ No _____
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19 If you answered "yes," please disclose with whom you have conversed and the general nature of the
20 conversation.

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27 62. Approximately when did you first become aware of this case? _____
28 _____

29 63. Have you ever commented on this case in letters, phone calls, or in any online posting? Explain.

30 _____
31 _____

32 64. The jury will be instructed not to read, watch or listen to any news accounts, including access or use
33 of the internet to gather information regarding this case including the trial or the people involved in
34 the trial until it is over. Are you able and willing to follow this instruction? YES _____ NO _____

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65 Further you may not to talk to anyone about the case, not even your spouse/partner until the trial is over is over, or even your fellow jurors until the jury retires to deliberate upon the verdict. Are you able and willing to follow such an instruction ? Yes _____ No _____
If “no,” briefly explain. _____

. After the jury has heard all of the evidence, arguments of counsel, and has received the Court’s instructions regarding the law, the jury will retire to deliberate. Each juror will be required to consult with his/her fellow jurors with a view towards reaching a verdict. Jurors must consider the views of their fellow jurors, but are not required to change their opinion merely for the purpose of reaching a unanimous verdict.

Would you have difficulty in considering the views of your fellow jurors?

YES: _____ NO: _____

Would you change your opinion regarding a just and proper verdict merely to reach an agreement with one or more of your fellow jurors?

YES: _____ NO: _____

VII. TRIAL LENGTH

65. This trial may take twelve (12) weeks to complete, with the trial going from 8:30 a.m. to 3:00 or 3:30 p.m. each weekday. Do you have any currently scheduled obligations which would make it impossible to serve or which might render you unable to concentrate on the case as a juror?

Yes _____ No _____

If your answer is “Yes,” please describe in detail these obligations, including dates and locations if it involves travel (as well as the purpose of the travel):

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66. The Court has proposed a daily trial schedule in an effort to allow jurors time each day to attend to personal affairs, manage appointments, or maintain some business obligations. The Court expects to conclude the proceedings each day by 3:00 to 3:30 p.m. Would having some time each day to meet your obligations diminish the concern you may have about serving on this jury?

Yes _____ No _____

Please explain:

67. There is a possibility that the jury will be sequestered for a period of time during this trial. Jury sequestration is the isolation of a jury to avoid accidental or deliberate tainting of the jury by any outside influence or information that is not admissible in court. Sequestered juries are kept together either at the Courthouse or at an undisclosed, secure location when not at the Courthouse, such as a hotel. During sequestration, jurors are not permitted to access the internet, watch live television that has not been approved by the court, read news, or use social media. There is limited access to communicating with family members under the supervision of a court bailiff. Would any potential sequestration pose an unmanageable hardship for you? Yes _____ No _____

If your answer is "Yes," please explain.

68. Is there any matter that **has not** been covered by this questionnaire concerning case, the death penalty, or your feelings and attitudes about the death penalty, or concerning **any other subject** that you feel that you should mention at this time because it might affect your ability serve as a juror or to be a fair and impartial juror in this case? Yes _____ No _____

If your answer is "Yes," please explain.
