

JURY QUESTIONNAIRE
[PLEASE PRINT]

BACKGROUND INFORMATION

Full name: _____

Date of birth: _____

Any other names you have used: _____

City/Area of residence: _____

Place of birth: _____

Are you a citizen of the United States? Yes ___ No ___

Marital status: (Circle one)

Single Married Domestic Partner Divorced Widowed

If you have children, please state for each child:

Gender	Age	Occupation
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

EDUCATION, EMPLOYMENT & INTERESTS

1. What is your occupation? _____
(Please indicate if homemaker, retired, or unemployed.)

2. Who is your employer? _____

a. What is your present job position or title? _____

b. Any previous position with the same employer? _____

c. How long have you been with this employer? _____

d. Duties and responsibilities of your present job:

3. If no longer employed, please list your former job: _____

4. What is your highest level of education? _____

5. What educational subjects did you study? _____

6. Have you ever studied or received any training or had any experience in:

a. Law? Yes ____ No ____ If yes, please explain:

b. Medicine, science, or psychology? Yes ____ No ____ If yes, please explain:

7. If you are presently a student, please indicate:

School Grade Full or Part time Major/Area of Study

8. Have you ever served in the armed forces? Yes ____ No ____ If yes, please explain duties and experience.

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

**ABILITY TO SERVE AS A JUROR/
POTENTIAL HARDSHIPS/LIMITATIONS**

10. Do you have any difficulty reading, speaking or understanding the English language? Yes ____ No ____

11. Do you have any hearing, vision or physical problem that would make it difficult to see evidence, hear testimony, or sit for long periods? Yes ____ No ____

If yes, please describe:

12. Do you take any medications that affect your memory or concentration?
Yes _____ No _____
13. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury?
Yes _____ No _____
14. Do you have any concerns or limitations that would prevent you from serving in a case that may last two weeks?

15. This case will involve testimony about sexual contact and sexual intercourse. Will that testimony be offensive or uncomfortable to you such that you would have trouble listening to the evidence and reaching a fair verdict?
Yes _____ No _____

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

16. Are you registered to vote? Yes _____ No _____
17. Under the law, a person's religious beliefs do not excuse compliance with the criminal laws prohibiting non-consensual sexual intercourse. Are you willing to accept and abide by this rule of law? Yes _____ No _____
18. Do you have any religious beliefs, moral feelings, political views, or philosophical principles that would interfere with your ability to serve as a juror in this particular case? Yes _____ No _____
If yes, please explain: _____

19. Please list any civic, political, social, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

20. Are you currently a practicing member of the LDS Church? Yes _____ No _____
21. Do you feel that rendering a verdict in this case would subject you to criticism by family, friends, business associates, your church or your church members, or others? Yes _____ No _____
22. If so, would such criticism concern you? Yes _____ No _____

23. Do you have any strong feelings towards government as a whole, or towards any branch of the government? Yes _____ No _____
If yes, please explain: _____

CRIMINAL JUSTICE SYSTEM

24. Do you have any previous experience as a juror? Yes _____ No _____
a. If yes, describe what kind of case _____

b. Were you the foreperson or presiding juror? Yes _____ No _____
c. What was the result? _____

25. Besides jury service, have you ever been in a courtroom for any other reason? Yes _____ No _____

If yes, please explain: _____

26. Do you have any negative feelings towards the legal system, prosecutors, defense lawyers, or the process generally? Yes _____ No _____

If yes, please explain _____

27. Have you or anyone close to you ever been a victim of a crime? If yes, please explain. Yes _____ No _____

28. If you have been a victim, do you have any strong feelings towards anyone as a result? If yes, please explain. Yes _____ No _____

29. Have you or anyone close to you ever been sexually abused or assaulted? If yes, please explain. Yes _____ No _____

30. Have you or anyone close to you ever been charged with sexual abuse or assault? If yes, please explain. Yes _____ No _____

31. Do you work or have you ever worked for any prosecutor's office, criminal defense attorney, law enforcement office, or police agency? Yes _____ No _____ If yes, please list who you worked for:

32. Please describe your opinion of criminal defense attorneys: _____

33. Please describe your opinion of prosecutors: _____

34. The following attorneys are involved in the prosecution of this case:

Brock R. Belnap
Ryan J. Shaum
Craig L. Barlow

The following attorneys are involved in the defense of this case:

Walter F. Bugden, Jr.
Tara L. Isaacson
Richard Wright

35. Do you know or are you familiar with any of the above-identified attorneys or anyone who works with or for them? Yes _____ No _____

36. If you answered "yes" to any of the above, identify the person(s) and explain the relationship(s):

37. What are your feelings about the effectiveness of our criminal justice system?

38. Is there anything you feel would make it difficult for you to be fair and impartial if selected as a juror in this case? Yes _____ No _____

If yes, please explain: _____

QUESTIONS ABOUT THE LEGAL RULES IN THIS CASE

39. The fact that Warren Jeffs is charged with a crime is not evidence that he is guilty of the crimes charged. Are you willing to accept and abide by this rule of law? Yes _____ No _____

40. Do you have any strong feelings about people simply because they have been charged with a crime? Yes _____ No _____

41. Any person charged with a crime must be proven guilty beyond a reasonable doubt before they can be convicted of that crime. Are you willing to accept and abide by this rule of law? Yes _____ No _____

42. Warren Jeffs does not have any obligation to testify, present evidence or prove his innocence. The entire burden to prove the defendant is guilty beyond a reasonable doubt is on the State. Are you willing to accept and abide by this rule of law? Yes _____ No _____

43. Sexual intercourse without consent is all that is required for rape. Ignoring a person's "no," standing alone, may be sufficient for a conviction of rape, even without the use of threat or force. Are you willing to accept and abide by this rule of law?
Yes _____ No _____

44. A person is not guilty as an accomplice to rape unless he intentionally, knowingly, or recklessly solicits, requests, commands, encourages, or intentionally aids another to have sexual intercourse without consent. Are you willing to accept and abide by this rule of law?
Yes _____ No _____

45. A person does not need to be physically present or personally have sexual intercourse to be guilty as an accomplice to rape if he solicits, requests, commands, encourages, or intentionally aids another to have sexual intercourse without consent. Are you willing to accept and abide by this rule of law?
Yes _____ No _____

46. With respect to the crime of rape, a 14-year old is capable of consenting to sexual intercourse. Regardless of your personal opinion, are you willing to accept and abide by this rule of law?
 Yes _____ No _____
47. Regarding consent, the law provides special protection for minors between the age of 14 and 18. For example, a minor does not legally consent if the minor was enticed into submitting to sexual intercourse. Entice includes acts or words intended to cause a minor to do something the minor would not otherwise do. Are you willing to accept and abide by this rule of law?
 Yes _____ No _____

MEDIA ISSUES

48. Do you read newspapers, magazines, books, or other periodic publications?
 Yes _____ No _____
49. How often do you read such materials?
 _____ Daily
 _____ Occasionally
 _____ Rarely/Never
50. Which newspaper(s), if any, do you read? _____

51. Which radio station(s), if any, do you listen to? _____

52. Which television station(s), if any, do you watch (Including cable channels)? _____

53. Have you read, seen or heard any news reports, articles or information related to this case? Yes _____ No _____
 If yes, please tell us what you remember: _____

54. Approximately how many newspaper articles have you read about this case?
 _____ Less than 5
 _____ Between 5 and 10
 _____ More than 10

55. Have you watched any television shows or specials about Warren Jeffs, the FLDS Church, or the residents of Hildale or Colorado City? Yes _____ No _____

If yes, what have you watched? _____

56. When was the last time you read, saw, or heard any news reports or articles related to this case?

57. How accurate do you feel the news reports about this case have been?

- _____ Very accurate
- _____ Somewhat accurate
- _____ Not very accurate
- _____ Not accurate at all
- _____ Don't know

FLDS EXPERIENCE

58. Have you or any member of your immediate family or close associates had any experience with members of the FLDS church? Yes _____ No _____

If yes, please briefly explain: _____

59. Do you know, or have you in the past, had any contact or association with people who have left the Fundamentalist Latter-Day Saints (FLDS) communities in Hildale, Utah or Colorado City, Arizona? Yes _____ No _____

If yes, please explain the contact or association: _____

60. What are your feelings about the FLDS Church?

61. Are you willing to put aside any feelings you may have about the FLDS church and reach a verdict based solely on the evidence in this case?

Yes _____ No _____

62. The practice of polygamy is not an issue in this case. But, polygamy or plural marriage is a central belief of the FLDS community. Are you comfortable setting aside any feelings you may have regarding polygamy and reaching a verdict based solely on the evidence presented in court?

Yes _____ No _____

63. There have been news reports about a group the media has labeled the “lost boys.” Warren Jeffs is not charged with any involvement with “lost boys” in this case. Are you comfortable setting aside any impressions you may have regarding “lost boys” and reaching a verdict solely based upon the evidence presented in this case?

Yes _____ No _____

RELATIONSHIPS TO PERSONS INVOLVED IN THE CASE

64. With regard to the persons listed in the *Witness List* attached, do you know or are you familiar with any of the identified individuals? Yes _____ No _____

65. If you answered “yes,” identify the person(s) and explain the relationship(s):

66. If you have any negative feelings towards any person you have identified, please write their name(s):

QUESTIONS ABOUT THE CASE

67. Have you discussed the circumstances surrounding this case with anyone? Yes _____ No _____

If yes, please briefly describe the conversation(s):

68. Has anyone ever expressed an opinion to you about whether Warren Jeffs is guilty or not guilty of the charges in this case? Yes _____ No _____

If yes, please explain: _____

69. Have you personally formed an opinion about Warren Jeffs' guilt or innocence as a result of anything you have heard, read or seen? Yes _____ No _____

70. Do you have any strong feelings towards Warren Jeffs as a result of what you have heard, read or seen in the news media about the defendant?

Yes _____ No _____

CLOSING QUESTIONS

71. If you were a party to this case - either the State or Warren Jeffs - is there any reason you would not want yourself to be a juror? Yes _____ No _____

If yes, please briefly explain: _____

72. Some people who are called for possible jury service want to be chosen while others do not. How do you personally feel? (Please check one.)

- _____ Very strongly want to serve
- _____ Somewhat want to serve
- _____ Indifferent
- _____ Opposed to serving
- _____ Strongly opposed to serving
- _____ Would be difficult

73. If you were convinced, at the conclusion of the trial, that the defendant is either guilty or not guilty of the crimes charged, and a majority of the jurors disagreed with you, would you change your verdict simply because you were in the minority? Yes _____ No _____

74. Is there anything that has come up in this questionnaire that creates doubt in your mind about whether you could be a fair, objective, and impartial juror in this particular case? Yes _____ No _____

If yes, please explain: _____

75. Is there anything else we should know about you as a prospective juror in this case?

PLEASE SIGN AND DATE

I declare under penalty of perjury under the laws of the State of Utah that the answers given in this Jury Questionnaire are true and correct.

Date: _____

Signature