



U.S. Department of Justice

United States Attorney
Eastern District of New York

EAG:MCM/NS
F. #2019R00029

271 Cadman Plaza East
Brooklyn, New York 11201

April 14, 2020

By ECF

The Honorable Ann M. Donnelly
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Robert Sylvester Kelly
Criminal Docket No. 19-286 (S-3) (AMD)

Dear Judge Donnelly:

Pursuant to the Court's February 6, 2020 Order, enclosed please find the parties' Joint Proposed Juror Questionnaire (the "Questionnaire") in the above-referenced matter, with the following exceptions to the joint nature of the Questionnaire.

The government has conferred with defense counsel and the parties agree on a substantial portion of the Questionnaire, which incorporates questions proposed by both parties. Defense counsel has advised, however, that it objects to the following questions in whole or in part as indicated:

Question No. 67: The defendant objects to the question in part and proposes the following bolded alternative language so that the question is not limited to the topic of a grant of immunity:

One or more government witnesses may testify that they participated in crimes. The witness may have a criminal history and may be testifying pursuant to an agreement with the government immunizing him or her from prosecution. Use of such witnesses is lawful. Do you have feelings about a witness who was granted immunity from prosecution, **or offered or promised anything**, that would make it difficult for you fairly and impartially to consider that testimony or render a guilty verdict based on the testimony of such witness? [] YES [] NO If YES, please explain:

Government's Objection: The government objects to the defendant's proposed additional language as overly broad, vague, likely to cause confusion and unfairly prejudicial. The broadness of the defendant's proposed language requires the prospective jurors to envision scenarios of an unspecified, and likely irrelevant, list of potential items that may hypothetically be offered to a witness.

* * *

Question No. 68: The defendant objects to this question and proposes the following alternative language:

It is the law that the testimony of a single witness can be sufficient to convict a defendant of a charged crime, if the jury finds that the testimony of that witness established proof beyond a reasonable doubt. Do you have any opinion or belief that would prevent you from applying this rule of law?
[] YES [] NO. If YES, please explain:

Government's Objection: The government objects to the defendant's proposed language to the extent that it is intended as an alternative to Question No. 68, and requests that Question No. 68 be provided as currently drafted. The intended purpose of Question No. 68 is to inquire whether the prospective juror would have any difficulty following the court's instructions regarding witness testimony and the burden of proof for the sole reason that the witness was granted immunity by the government. The defendant's proposed language removes any reference to an immunized witness, rendering it ineffective in its purpose to ascertain the individual's views or prejudice against a witness that has obtained immunity. While a juror is entitled to consider a grant of immunity when determining whether to credit a witness's testimony, it is relevant and proper to inquire as to whether the individual has an unreasonable bias against such a witness that would otherwise make the individual unable to follow the Court's instructions. Notably, the government initially proposed Question Nos. 67 and 68 as a single question consisting of two subparts, (a) and (b). At the defendant's request, the government separated the subparts into two individual questions, but believes they may readily be combined as a multipart question.

* * *

Question No. 69: The defendant objects to this question in its entirety on relevance grounds and proposes that it be deleted.

Government's Objection: It is the government's position that given that the investigation in this matter involved the execution of one or more judicially authorized warrants, and that the government anticipates evidence obtained as a result of the warrant(s) will be presented at trial, prospective jurors' beliefs regarding such

investigatory tactics by law enforcement are relevant and the question is therefore proper and warranted.

The defendant further proposes that the following questions be added to the Questionnaire, to which the government objects for the reasons stated:

Proposed Question: Have you, a family member, a close friend, or a spouse or partner, ever had a sexually transmitted disease. YES [] NO []. If YES, please explain.¹

Government's Objection: The government objects to this question in its entirety as overly broad and unduly invasive. Requiring prospective jurors to disclose protected medical information about themselves and others close to them is unnecessarily intrusive. To the extent the prospective jurors' views on sexually transmitted diseases are relevant, the issue of potential bias or other relevant information may readily be ascertained through the less intrusive question proposed by the government, which, as posed, inquires whether the fact that the case involves allegations regarding exposure to one or more sexually transmitted diseases will affect the individual's ability to be fair and impartial and, if so, seeks an explanation. (See Question No. 37).

* * *

Proposed Question: If you were to be selected to serve on this jury, and you find that the Government has not proven the allegations against Mr. Kelly beyond a reasonable doubt on any or all of the charges, will you be able to render a verdict in favor of Mr. Kelly? [] YES [] NO. If NO, please explain.²

Government's Objection: The government objects to this question as overly broad, vague, confusing and duplicative of questions already posed in the Questionnaire. The Questionnaire has multiple questions which inquire about the individual's ability to follow the Court's instructions, particularly as to the burden of proof. (See, e.g., Question Nos. 35, 61, 66, 70 and 72). Moreover, the jurors will be instructed by the Court as to the manner by which they are to render a verdict. In addition, as phrased, the question misstates the law and suggests that a juror would need to render a general acquittal in favor of the defendant if the government failed to meet its burden on "any . . . charges."

* * *

¹ The defendant proposes that this question be inserted after or as part of Question No. 37.

² The defendant proposes that this question be inserted after Question No. 66.

EAG:MCM/NS
F. #2019R00029

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA

v.

19 CR 286 (S-3) (AMD)

ROBERT SYLVESTER KELLY
also known as "R. Kelly,"

Defendant.

-----X

THE HONORABLE ANN M. DONNELLY
UNITED STATES DISTRICT JUDGE
UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK
225 CADMAN PLAZA EAST
BROOKLYN, NEW YORK

THIS PAGE IS THE QUESTIONNAIRE COVER SHEET.

PLEASE TEAR OFF THIS PAGE AND TAKE IT WITH YOU

After you are excused today, please CALL the following telephone number on XX-XX-XXXX after __:__ p.m. Upon calling, you will receive instructions about the date on which you are to report back to court. It is extremely important that you know the juror number written on the top of this form when you make your call. Thank you.

Phone number: 1-800-XXX-XXXX

Date to call:

Time to call:

UNITED STATES v. ROBERT SYLVESTER KELLY

JUROR QUESTIONNAIRE

THE ANSWERS TO THE QUESTIONS ON THIS PAGE WILL BE DISCLOSED ONLY TO THE APPROPRIATE COURT PERSONNEL AS DIRECTED BY THE PRESIDING JUDGE

Please print the following information.

Name:

Home Address:

Home Phone:

Job Title & Department:

Business Address:

Cellular Telephone:

I hereby certify that the foregoing information, and all of the answers in this questionnaire, are true, correct, and complete to the best of my knowledge.

Date:

SIGNATURE _____

UNITED STATES v. ROBERT SYLVESTER KELLY

CONFIDENTIAL JUROR QUESTIONNAIRE INSTRUCTIONS

TO THE PROSPECTIVE JUROR:

Welcome to the courthouse and thank you for participating in jury service. This questionnaire is an important part of the jury selection process. You are sworn to give complete and truthful answers – under penalties of perjury – to the questions that follow. All of the information you provide will be kept confidential and will be seen only by the Judge, the Clerk’s Office and the members of the prosecution and defense teams.

Citizens in our community hold a wide variety of different views and have had different life experiences that inform their feelings and views on different topics. We are genuinely interested in learning your views and feelings on a variety of issues and questions. There are no “right” or “wrong” answers to these questions; just be candid and truthful.

Please answer each question by placing a check next to the correct response and by providing the information requested. Please take your time and answer each question as fully as possible. Answer all questions. If a question does not apply to you, fill in the space with an “N/A” for “not applicable.” Do not leave any answer blank. Write in dark ink and as legibly as possible. Please do not write on the back of any page. If you need extra space, you may continue your answer in the space provided at the end of the questionnaire.

On the remaining pages of the questionnaire, please do not provide any specific names or addresses or any information that may identify you or members of your family. It is a common practice followed in many cases in Federal Court, especially where there may be media attention to the case, to keep the names and identities of the jurors in confidence. This is in no way unusual.

The Court directs that you shall not discuss this questionnaire or your answers with friends, family, co-workers, court personnel or anyone else. It is important that the answers you provide are yours and yours alone. From this point forward, the Court further directs you not to read, watch or listen to any news about this case including all media sources such as TV, radio, newspaper, on-line sites, blogs, social media, YouTube, Google searches, etc. You are not to discuss this case with anyone, including your family. You are directed not to research this case or the people involved: do not research any of the facts presented in this questionnaire, any prior court proceedings, the victims, the defendant, the lawyers and/or the Judge through any resource including the internet, media publications or any other source of information.

Jury service is one of the most important duties a citizen can be called on to perform. You will be fulfilling your civic duty by responding completely and honestly during jury selection. Your participation and cooperation in this process is greatly appreciated.

THE HONORABLE ANN M. DONNELLY
UNITED STATES DISTRICT COURT JUDGE

UNITED STATES v. ROBERT SYLVESTER KELLY,

also known as “R. Kelly”

Cr. No. 19-286 (S-3) (AMD)

JUROR QUESTIONNAIRE

This questionnaire is designed to help simplify and expedite the jury selection process. You must give true and complete answers to all questions. Although some of the questions may appear to be of a personal nature, please understand that these questions will help the parties and the Court select a fair and impartial jury. Part of the selection process depends on your ability and promise to follow the law as it is explained by the Court. Thus, some of the questions include descriptions of legal principles and ask whether you can conscientiously follow them.

The defendant Robert Sylvester Kelly is charged with Racketeering, in violation of Title 18, United States Code, Sections 1962(c) and 1963, for his alleged role as the leader of an enterprise (“the Enterprise”), and is alleged to have engaged in racketeering acts, including bribery, sexual exploitation of a child, kidnapping, transportation of minors and other individuals for the purpose of engaging in illegal sexual activity, illegal coercion and enticement of individuals and forced labor. Mr. Kelly is also charged with violations of the Mann Act, including the transportation of individuals, including a minor, for the purpose of engaging in illegal sexual activity, and illegal coercion and enticement of individuals, including a minor, in violation of Title 18, United States Code, Sections 2421(a), 2422(a) and (b), and 2423(a). Mr. Kelly has pleaded not guilty to all of the charges. This is just a summary of the charges to give you some background on the case. The court will instruct the jury as to the elements of the crimes charged and the applicable law at a more appropriate time during trial.

CONFIDENTIAL JUROR QUESTIONNAIRE

JUROR # _____

BACKGROUND INFORMATION

- 1. What is your current age? _____
- 2. Are you [] Male [] Female [] Non-binary or Other []?
- 3. Where do you currently live? County: _____ Neighborhood: _____
- 4. How long have you lived there? _____
- 5. Where did you live before that? _____
- 6. How long did you live there? _____
- 7. Where were you born? _____
- 8. Where were you raised? _____
- 9. Where else have you lived (please include neighborhoods and any foreign countries)? _____

10. Do you own or rent your home? _____

11. Are you currently: **(Please check all that apply)**

- | | | |
|--|--|---|
| <input type="checkbox"/> Employed <i>full time</i> | <input type="checkbox"/> Self employed | <input type="checkbox"/> A student |
| <input type="checkbox"/> Employed <i>part time</i> | <input type="checkbox"/> A homemaker | <input type="checkbox"/> Unemployed <i>looking for work</i> |
| <input type="checkbox"/> Employed <i>more than one job</i> | <input type="checkbox"/> Retired | <input type="checkbox"/> Unemployed <i>not looking for work</i> |
| | | <input type="checkbox"/> Disabled |

12. If you are currently a student, what is your area of study? _____

13. If you are employed, describe your current occupation and job duties.

Do NOT list name or location of employment. If you are currently retired or otherwise without a job, please write that and then complete information below for your *last job*.

14. What other types of jobs have you held throughout your life?

15. In your work, have you ever managed, directed or supervised others? YES NO

If YES, how many people have you managed, directed or supervised? _____

If YES, how long have you been a supervisor? _____

16. How far did you go in school (list any degrees or certificates)?

17. If you attended college or graduate school, what did you study?

18. Other than English, what languages to you speak?

19. Would others describe you as open minded and willing to listen to and assess different viewpoints?

20. Have you ever served in any branch of the armed forces of the United States (including the military reserves, National Guard, or ROTC)? YES NO If YES, please state the branch of service, how many years you served, the highest rank you attained, whether you were honorably discharged, and summarize any special training you received. _____

21. Have you, or any close family members, ever been self-employed or owned your own business? YES (you) YES (family) NO Without listing names of any people or businesses, describe the kind of business, what person owned it, and for how long? _____

22. In your personal life, what special skills, hobbies and/or interests do you have, including foreign travel or membership in any clubs, groups or organizations, including civic, social, union, professional, fraternal, recreational, volunteer or religious? _____

23. Are you presently a member of any church, synagogue, mosque, temple, or do you participate in any other religious organization? YES NO Do your religious beliefs affect your ability to sit in judgment of others? YES NO

24. What is your current relationship status: _____

25. Please describe your spouse's/partner's/significant other's occupation, job duties, and highest level of education. Please do NOT list his/her place of employment. _____

26. Do you have any children? YES NO If YES, please list the following for each: *(Please include children you are currently raising or have ever raised even if they are not your biological children.)*

Gender	AGE	CHILD LIVING WITH YOU? Yes or No	HIGHEST LEVEL OF EDUCATION	TYPE OF OCCUPATION/LEVEL IN SCHOOL (Do NOT list names of employers or schools)

DRAFT

KNOWLEDGE OF THE CASE AND PEOPLE

The media has reported a number of things about this case. We are interested in what you may recall, if anything.

27. The case for which you are summoned involves the defendant ROBERT SYLVESTER KELLY, also known as “R. Kelly.” Have you read, seen or heard anything about the case, the alleged crimes, or people involved? YES NO Sounds familiar, but unsure

28. If YES, please describe in detail what you recall reading, seeing, or hearing about the defendant, the alleged crimes, the court proceedings or the people involved (regardless of whether you believe this information is accurate or not). If you need additional space, please use the Additional Comment Page at the end of this document.

29. Have you read, seen or heard about Robert Kelly, also known as “R. Kelly”? YES NO Unsure

30. If YES, please describe in detail what you recall reading, seeing or hearing about Robert Kelly, also known as “R. Kelly”, and your views or feelings about that information.

31. Have you ever talked about or overheard discussions about any aspects of this case among friends, family, or coworkers? YES NO Unsure If YES, please describe what you/they talked about:

32. Have you ever read or posted opinions online related to this case or the people involved?

YES NO

If YES, please describe: _____

33. Have you ever posted opinions online about any court proceeding? YES NO

If YES, please describe: _____

34. This case involves allegations related to an individual who is known publicly as a result of his profession in the music and entertainment business. Do you have any views or feelings about serving as a juror in a case where the defendant that has been accused of criminal conduct can be described as a celebrity or public figure? YES NO. If YES, what are your views or opinions?

35. The defendant is charged with leading an enterprise which is alleged to have engaged in conduct including bribery, kidnapping, sexual abuse, exploitation of minors, transportation of minors and other individuals for the purpose of engaging in illegal sexual activity, production of child pornography, and forced labor. These are only charges. Mr. Kelly is presumed innocent of these charges, and it is the government's burden to prove him guilty beyond a reasonable doubt. Is there anything about the nature of these charges, in and of themselves, that would interfere with your ability to fairly decide this case impartially in accordance with the instructions of the court? YES NO If YES, please explain: _____

36. Do you have any specific views or feelings concerning laws regarding the age at which individuals under the age of 18 can or cannot consent to sexual activity with other individuals? Yes No If YES, what are your views or opinions and would they affect your ability to serve as a fair and impartial juror?

37. The charges in this case involve allegations regarding exposure to one or more sexually transmitted diseases. Is there anything about such an allegation, without more, that you believe would affect your ability to serve as a fair and impartial juror?

DRAFT

EXPERIENCES WITH AND OPINIONS ABOUT THE CRIMINAL JUSTICE SYSTEM

38. Have you or a friend or family member ever been employed, trained, applied for work, or volunteered in any law enforcement agency, corrections, or a related field? (*Examples: police, sheriff, FBI, jail, probation officer, private security, etc.*) [] YES (self) [] YES (friend or family member) [] NO

If YES, without listing names of the persons, please indicate your relationship with that person, where, the job or nature of experience and the approximate dates:

39. Have you or a friend or family member ever been employed by or volunteered in any aspect of criminal defense work, including any Public Defender's office, a Legal Aid, or with a related support or advocacy group having to do with the rights of people charged with crimes?

[] YES (self) [] YES (friend or family member) [] NO

If YES, without listing names, please indicate what person, where, the job or nature of experience and the approximate dates:

40. Have you or a friend or family member ever been employed by or volunteered in any aspect of the work of a prosecutor's office, including any related support or advocacy group? [] YES (self)

[] YES (friend or family member) [] NO

If YES, without listing names, please indicate the person's relationship to you, the job or nature of experience, the location and the approximate dates:

41. Have you *or* a friend or family member ever been accused of, charged with, or convicted of any crime, or been the subject of a criminal investigation? [] YES (self) [] YES (friend or family member) [] NO
If YES, without listing names, please explain the nature of the charges, the approximate date(s), who brought the charges and the outcome:

42. Have you *or* a friend or family member ever been accused of sexual harassment? [] YES (self) [] YES (friend or family member) [] NO
If YES, without listing names, please explain the nature of the allegations, the approximate date(s), and the outcome:

43. Have you *or* a friend or family member ever been the victim of sexual harassment, sexual abuse or sexual assault? [] YES (self) [] YES (friend or family member) [] NO
If YES, without listing names, please explain:

44. Have you been a victim of any other violent crime *or* do you know anyone who has been a victim of a violent crime? [] YES (self) [] YES (friend or family member) [] NO
If YES, without listing names, please explain who the victim was, when and where the crime occurred, what happened, whether you or your friend/family member received medical treatment as a result of the crime, whether anyone was arrested or convicted, if so, what the outcome of the case was and what, if any, effect this experience has had on you:

45. Have you, any member(s) of your family, or anyone close to you ever testified as a witness in court or in a deposition or have you ever been subpoenaed to testify? YES (self) YES (friend or family member) NO If YES, without listing names, please explain: _____

46. Would that experience affect your ability to be fair and impartial in this case? YES NO
If yes, please explain: _____

47. Have you ever been involved, or do you expect to become involved, in any legal action or dispute with a government agency or have you had any financial interest in such a dispute? YES NO
If yes, please explain: _____

48. If you answered "YES" to Question 47, is there anything about that experience that would affect your ability to be a fair and impartial juror in this case? YES NO
If yes, please explain: _____

49. Have you, or has anyone you know, ever been involved in providing the government with information in a criminal investigation? YES NO If YES, without listing names, please explain the circumstances and who was involved: _____

50. Have you or a close friend or family member ever been in prison?

YES (self) YES (friends/family) NO If YES, without listing names, please explain:

51. Have you ever taken any courses or worked in the fields of sexual abuse counseling, law, criminal justice, criminology, or other related areas? YES NO If YES, please explain: _____

52. Have you ever known anyone, including yourself, who was the victim of a sexual assault, other assault, homicide or other act of violence that required medical treatment or counseling? YES NO If YES, please explain: _____

53. Do you, anyone in your household or a close friend own any guns? YES NO

If yes, please state your relationship to that person (**please do not list any names, but rather respond, for example, “wife,” “friend”**), how many and what type(s) of firearm(s).

54. Do you have any friends or family members who have ever been lawyers, judges, law clerks, or otherwise involved in the legal field? YES NO If YES, without listing names, please explain:

55. Have you, a family member or close friend ever practiced law in the area of criminal defense or prosecution? YES (you) YES (family/friend) NO

If YES, please explain: _____

56. Do you have any opinions about lawyers that would affect your ability to be a fair and impartial juror?

YES NO If YES, please explain: _____

57. Have you, a family member or close friend ever filed a complaint with the police or any law enforcement agency against anyone? YES NO If YES, please describe the circumstances surrounding the complaint.

58. Have you or anyone close to you ever had a positive or negative experience involving the police or any law enforcement agency? YES NO If YES, without listing names, please explain:

59. Do you read any books, blogs, social media sites or other websites about celebrities or crimes, including sexual abuse or assault, or watch or listen to any television programs, movies, podcasts or documentaries about celebrities or crimes, including sexual abuse and sexual assault, or the criminal justice system? YES NO If YES, please list them: _____

60. Have you ever served as a juror before? YES NO. If YES, please list the number of Civil cases _____ or Criminal Cases _____.

Have you served in State Court jury Federal Court jury and/or on a Grand Jury?

a) Without listing the names of any parties, in what type of case(s) have you served as a juror (*example, auto accident, burglary, etc.*)? _____

b) Were you ever the foreperson? YES NO If YES, how many times? _____

c) Did you ever reach a verdict? YES NO. If NO, what happened? _____

61. The defendant in a criminal case is presumed innocent at all stages of the trial, and is not required to present any defense. The Government is required to prove the defendant guilty beyond a reasonable doubt on each charge. Regardless of what the law says, if chosen to sit on this jury, do you have any issues or thoughts regarding those legal standards? YES NO. If YES, explain. _____

62. The defendant in a criminal case has an absolute right not to testify. Regardless of that right and what the law says, what impressions or opinions do you have of a defendant if he or she *does not* testify at trial?

63. Do you believe that police or law enforcement officers are more likely to tell the truth than other witnesses? YES NO If YES, please explain your views:

64. Do you believe that police or law enforcement officers are more likely to lie than other witnesses? YES NO If YES, please explain your views: _____

65. Regardless of your own opinions, you will be instructed by the Judge that members of law enforcement who testify at trial are not, in and of themselves, to be considered more or less truthful than

witnesses who testify at trial who are not members of law enforcement? Regardless of your own opinions on that subject, will you be able to follow that instruction? YES NO. If NO, please explain.

66. If selected to serve as a juror, you will be instructed that Mr. Kelly and his counsel do not have an obligation to present any evidence at all at trial, including after the Government rests its case? Do you accept this principle and will you be able to apply it if selected to serve on this jury? YES NO. If NO, please explain. _____

67. One or more government witnesses may testify that they participated in crimes. The witness may have a criminal history and may be testifying pursuant to an agreement with the government immunizing him or her from prosecution. Use of such witnesses is lawful. Do you have feelings about a witness who was granted immunity from prosecution that would make it difficult for you fairly and impartially to consider that testimony or render a guilty verdict based on the testimony of such witness? YES NO
If YES, please explain: _____

68. It is the law that the testimony of a single witness, including a witness who has received immunity from prosecution, can be sufficient to convict a defendant of a charged crime, if the jury finds that the testimony of that witness established proof beyond a reasonable doubt. Do you have any opinion or belief about the law or witnesses who have received immunity that would prevent you from applying this rule of law? YES NO If YES, please explain: _____

69. The law provides that the government can, once it demonstrates probable cause to believe that a crime has been or will be committed, obtain authorization from a court to search a premises or electronic media to obtain evidence including, but not limited to, emails, text messages, video recordings, letters, financial

information and other materials or information. Do you have any particular feelings about this law that would affect your ability to evaluate the evidence fairly and impartially?

YES NO If YES, please explain.

70. Under the law, the facts are for the jury to determine and the law is for the Judge to determine. You are required to accept the law as the Judge explains it to you even if you do not like the law or disagree with it, and you must determine the facts according to those instructions. Would you have any difficulty following the Judge's instructions? YES NO

If YES, please explain: _____

71. Under the law, the question of punishment, if any, should not enter your deliberations. Would you have any difficulty following this rule? YES NO

If YES, please explain: _____

72. Under the law, emotions such as sympathy, bias and prejudice must not enter into the deliberations of the jurors as to whether the guilt of the defendant has been proven beyond a reasonable doubt. Would you have any difficulty following this rule? YES NO

If YES, please explain: _____

73. Do you have any views about people of other races or ethnicities that would affect your ability to be a fair and impartial juror? YES NO

MEDIA AND THE INTERNET

74. What publicly known person do you most admire and why? _____

75. What publicly known person do you least admire and why? _____

76. How often do you make it a point to follow the news?

Every day Almost every day Several times a week Several times a month Never

77. Which sources do you regularly rely on for news? Please check the box corresponding to your regular news sources.

Television Newspapers Radio Internet Social Media YouTube Podcasts

Magazines Personal conversations Other (list other sources):

78. Please list the names of your regular news sources (*ex: Wall Street Journal, NY Times, NY Post, CNN, Fox News, Univision, etc.*): _____

79. What books, if any, have you recently read?

80. What magazines, if any, do you regularly read?

81. What is your favorite book and why? _____

82. What are your favorite television shows? _____

83. Who are your favorite music artists/groups? _____

84. What are your favorite Internet sites, vlogs, blogs, podcasts or social media sites? _____

85. How often do you tweet, blog, vlog, podcast, or post comments on the Internet?
 Every day Almost every day Several times a week Several times a month Never

86. Do you have your own online blog, vlog, YouTube channel or podcast or do you contribute to any blog, vlog, YouTube channel or podcast sites? YES NO

If YES, without listing names or identifying the blog, please explain the nature of the blog: _____

JURY SERVICE QUESTIONS

87. If you are selected as a juror in this case, the judge will instruct you to avoid all media coverage, and not to go on the Internet with regard to this case for any purpose. That is, you will be forbidden from reading newspaper articles or watching news reports about this case, “Googling” this case, blogging, vlogging, tweeting, podcasting, or otherwise posting/commenting on social media sites, etc. Do you have any reservations or concerns about your ability or willingness to follow this instruction? YES NO If YES, please explain:

88. Is there anything about the nature of the charges or the facts of the case as they have been explained to you thus far that would affect your ability to serve as a juror in this case? YES NO

If YES, please explain: _____

89. If you were selected to serve on this jury, would you consider and respect the views of other jurors even if their views differed from yours, in accordance with the Court’s instructions, before making your decision?
 YES NO

Please explain: _____

NAMES & ORGANIZATIONS

Please review the following names. If you are familiar with any of these individuals or organizations, please check “YES” on the last question on the previous page, and indicate there who you know, and the nature of your relationship.

[INSERT ATTORNEY, JUDGE, WITNESS, GROUPS AND ORGANIZATIONS, LOCATIONS LIST HERE]

(To Be Provided)

DRAFT

SCHEDULING AND ABILITY TO SERVE

This proceeding is expected to begin on July 7, 2020, and last approximately four weeks. Court sessions will last from approximately [TIME] a.m. until [TIME] p.m., Monday through Friday. There are regular breaks approximately every 90 minutes and a one-hour break for lunch.

92. Do you have any difficulty reading, understanding, or speaking English? YES NO If so, please explain:

93. Do you wish to apply to the Court to be excused on the grounds that jury service in this case would be a serious hardship to you? YES NO If YES, please describe your circumstances.

94. Do you have any personal, family, or professional obligations that you feel would seriously interfere with your ability to focus and concentrate as a juror in this case? YES NO Unsure If YES, please explain:

95. Does your employer pay you for time missed as a result of jury service? YES NO Unsure*

**If you are unsure, please find out before you return to court for jury selection questioning.*

96. Do you have any condition, disability, or need that will require any special consideration or accommodation while you are in court? YES NO If YES, please explain:
