

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Court File 62-CR-16-8110

State of Minnesota,

Plaintiff,

v.

JUROR QUESTIONNAIRE

Jeronimo Yanez,

Defendant.

INSTRUCTIONS

This questionnaire has been prepared to assist in jury selection in the above criminal case, and is to be filled out by each prospective juror in this case. The information requested in the questionnaire is designed to save time and assist the court and the parties in selecting jurors for the trial. Your responses to the questionnaire will eliminate the need to ask these questions in open court.

The information requested is further intended to protect the fairness and impartiality of the trial by eliminating the potential for bias or prejudice among members of the jury panel, to allow the parties to know more about each panel member, and to assist in reducing the jury panel to the proper size for the trial itself. It is not this court's intention to embarrass anyone. Your answers must be complete, candid and honest, so that the parties will have a meaningful opportunity to select a fair and impartial jury. Following completion of the questionnaires, each prospective juror to be questioned will be questioned individually rather than as a group.

YOU ARE UNDER OATH AND ARE REQUIRED TO ANSWER THE QUESTIONS TRUTHFULLY. YOU ARE TO SIGN THE QUESTIONNAIRE. YOUR ANSWERS WILL HAVE THE EFFECT OF A STATEMENT GIVEN UNDER OATH TO THE COURT.

In order to ensure that your answers are not influenced by the opinions of others, you should fill out the questionnaire by yourself without talking to or consulting with any other person.

You must print or write your answers in **blue or black pen**. Please print or write legibly. If your answers are illegible, you may be requested to recopy your answers.

Please read each question carefully and answer each question as completely and accurately as you can. There are no right or wrong answers to 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 the 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 sheet 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 any question calls for a response that is so personal and private that you want to discuss it with

the judge and the attorneys in the judge's office, please write "I need to speak in private" and give a brief description of the information. If any follow-up is required, a private hearing with the judge and attorneys may be conducted to discuss the response.

Until you are excused as a juror, **you are ORDERED** to not discuss or otherwise communicate with anyone, including your family and close friends, anything connected with this case, including the questions asked in this questionnaire, your answers or any other aspect of this case. You may tell your family and employer only the time and place of this trial and your time requirements as a juror. **If anyone approaches you and attempts to learn about or discuss any aspect of this questionnaire or your potential service as a juror in this case, you may not answer their inquiries.** If they persist, you should report this to the court immediately.

You are also ORDERED to not read, watch or listen to any news or social media coverage of this matter. Do not investigate or research anything about this case, including the issues, evidence, parties, witnesses, location, or the law, through any form of written, print, electronic, internet or social electronic media. Do not allow anyone to discuss these subjects with you.

Please return this form to the judge's clerk immediately upon its completion. You will then be excused from the trial for the rest of the day. You are to return to the jury office tomorrow morning, May 31, no later than 8:45 a.m. You are not to make a copy of the questionnaire.

THANK YOU FOR YOUR PATIENCE, COOPERATION, AND CONTRIBUTION TO A
FAIR AND IMPARTIAL JUSTICE SYSTEM.

HONORABLE WILLIAM H. LEARY
Presiding Judge

Juror Pool Member Number: _____

GENERAL BACKGROUND

- 1. Age: _____
- 2. Gender: _____ Male _____ Female
- 3. What city / town / neighborhood / township do you live in? _____
- 4. How long have you lived in Ramsey County? _____
- 5. How long have you lived at your current address? _____

_____ Own _____ Rent

- 6. Where did you grow up? (City, County, State) _____

- 7. What is your marital status?

_____ Married.	How many years?	_____
_____ Divorced	How long were you married?	_____
_____ Separated	How long?	_____
_____ Widowed	How long were you married?	_____
_____ Living with significant other	How long?	_____
_____ Single		

- 8. If you have children, stepchildren or are the guardian of any children, please state:

<u>Sex</u>	<u>Age</u>	<u>Does child live with you?</u>	<u>Education*</u>	<u>Occupation*</u>	<u>Marital Status*</u>
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

Answers to questions marked with an * are only required for adult children.

- 9. If anyone else is living in your home, what is their relationship to you, their age and occupation?

EMPLOYMENT

10. What is your present job or occupation? _____
_____ Full Time _____ Part Time
_____ Unemployed _____ Disabled
_____ Retired _____ Homemaker
_____ Student
11. Briefly describe your job:

12. How long have you been so employed? _____
13. Prior to this employment, what did you do? _____
14. If you are retired or disabled, what was your last job or occupation? _____
15. If you are currently unemployed, what is your customary work? _____

16. Do / did you supervise others? _____ Yes _____ No
17. Have you ever owned your own business? _____ Yes _____ No
- IF YES**, please describe nature of the business: _____
18. If married or living with another person, does the other person work outside the residence and, if so, what is that person's job or occupation? _____
19. If he or she is retired or unemployed, what was his or her occupation before retiring or being unemployed? _____

EDUCATION

20. What is your highest level of education?
_____ Less than high school _____ College work _____ Graduate degree
_____ High School diploma _____ College graduate
_____ Technical or Business school _____ Postgraduate work

IF MORE THAN HIGH SCHOOL DIPLOMA, PLEASE LIST ALL DEGREES, CERTIFICATES, LICENSES AND MAJOR AREAS OF STUDY, TELLING WHEN AND FROM WHAT INSTITUTION: _____

21. If married or living with another person, what is your spouse or significant other's educational background? _____

22. Have you ever had any training, education or jobs or have you ever done any volunteer work in any of the following areas? (Check each one that applies to you)

- | | |
|--|---|
| <input type="checkbox"/> Corrections / Jail / Prison | <input type="checkbox"/> Victims of Crimes |
| <input type="checkbox"/> Counseling | <input type="checkbox"/> Firearms / Guns |
| <input type="checkbox"/> Forensic Sciences | <input type="checkbox"/> Security |
| <input type="checkbox"/> Genetics / DNA | <input type="checkbox"/> Investigations |
| <input type="checkbox"/> Justice System / Courts | <input type="checkbox"/> TV / Radio |
| <input type="checkbox"/> Laboratory | <input type="checkbox"/> Law |
| <input type="checkbox"/> Law Enforcement | <input type="checkbox"/> Local / State Government |
| <input type="checkbox"/> Medicine / Nursing | <input type="checkbox"/> Mental Health |
| <input type="checkbox"/> Pathology | <input type="checkbox"/> Police Procedures |
| <input type="checkbox"/> Psychology | <input type="checkbox"/> Science or Biology |

IF YES TO ANY OF THESE, please explain: _____

PERSONAL

23. It is anticipated that this trial will begin on May 30, 2017, and could take up to three weeks to complete. Do you have any personal obligations, circumstances or commitments that would impact your ability to serve on this jury? _____ Yes _____ No

IF YES, please explain: _____

24. What are your hobbies, major interests, recreational pastimes, and spare-time activities?

25. Please list all groups or organizations in which you participate or are a member. For example, service clubs, civic groups, social groups, church or church groups, unions or professional organizations, volunteer activities, educational or political groups, neighborhood groups or self-help groups, the NRA, Sierra Club, PTA, Rotary, **any group that protests against police or government agencies, any group whose members are primarily composed of persons of one race, any group which discriminates against any race, any group which claims superiority over other races:**

26. Have you ever held a leadership position in any organization listed in response to the previous question? _____ Yes _____ No

IF YES, please list the leadership position(s) and duties:

27. Where do you get your news? Check all that apply:

- | | | | |
|-------|---------------------------|-------|--|
| _____ | Radio | _____ | Facebook |
| _____ | Newspapers | _____ | Twitter |
| _____ | Television | _____ | Linkedin |
| _____ | Magazines | _____ | Other Social Media (please identify) _____ |
| _____ | Internet | | |
| _____ | Neighbors (word of mouth) | | |
| _____ | Other (please identify) | _____ | |

28. How often do you read the newspapers to get your news? Please check one box:

- _____ Daily
_____ 3 to 4 times a week
_____ 1 to 2 times a week
_____ Rarely
_____ Never

29. How often do you watch television to get your news? Please check one box:

- _____ Daily
_____ 3 to 4 times a week
_____ 1 to 2 times a week
_____ Rarely
_____ Never

30. How often do you listen to the radio to get your news? Please check one box:

- _____ Daily
_____ 3 to 4 times a week
_____ 1 to 2 times a week
_____ Rarely
_____ Never

31. How often do you search the Internet or social media to get your news? Please check one box:

- _____ Daily
_____ 3 to 4 times a week
_____ 1 to 2 times a week
_____ Rarely
_____ Never

32. Which newspapers or magazines do you regularly read?

33. What kinds of television shows, if any, do you watch on a regular basis? (Please check all that apply.)
- Morning news shows like "Good Morning America" and "Today."
 - Morning talk shows
 - Morning or afternoon soap operas
 - Afternoon talk shows
 - Evening network news
 - Evening or late night local news
 - T.V. tabloids like "Hard Copy," "Inside Edition," and "American Journal."
 - Prime time series (sitcoms and dramas)
 - Reality shows (such as "Survivor")
 - Learning / Discovery / Educational
 - Sports / sporting events
 - Investigative journalism (like "20/20," "Dateline," and "60 minutes")
 - Crime Shows (like "Cops," and "America's Most Wanted")
 - Fictional crime stories (such as "CSI," "Law and Order")
 - Political talk shows
 - Late night news shows
 - Late night talk shows (like "David Letterman" or the "Tonight Show")
 - Court T.V., CNBC or other court or law related programs

MILITARY

34. Were you ever in the military? Yes No
 (Including ROTC, National Guard)

IF YES, answer the following:

- a.) What branch? _____
- b.) Date of Service? _____
- c.) Rate or rank? _____
- d.) Where were you stationed? _____
- e.) Character of discharge (honorable, general, etc.)? _____
- f.) Reason for discharge? _____
- g.) What were your duties? _____
- h.) Were you ever involved in combat? (if yes, when and where)

35. If you were in the military, were you ever involved in any way with military law enforcement, non-judicial punishment, courts martial, or administrative boards or hearings? Yes No

IF YES, please explain: _____

FIREARMS

36. Do you, or any members of your family, own firearms? ___ Yes ___ No
37. Have you, or any member of your household, ever been a member of, or contributed to, any organization concerned with hunting or firearms, whether for or against such activities? Examples include, but are not limited to the NRA, Ducks Unlimited, Pheasants Forever, etc?
_____ Yes _____ No
38. Have you ever had training in the use of firearms? ___ Yes ___ No

LAW ENFORCEMENT AND JUDICIAL CONTACTS

39. Have you, a family member or a close friend, ever been the victim of a crime whether it was reported to law enforcement authorities or not?
_____ Yes, I have _____ Yes, family or friend _____ No

IF YES: What was the crime and what was the outcome? _____

40. Have you ever been a witness to a crime, filed a report with a police office or other law enforcement agency, or had contact with a district or county attorney's office?
_____ Yes _____ No

IF YES, please explain: _____

41. Have you, any family member, or anyone close to you ever been a suspect in, arrested for, or charged with a criminal offense, other than a minor traffic offense?
Yes _____ No

IF YES, please explain: _____

42. If you answered **yes** to questions **39, 40, or 41**, was there anything about your experiences with law enforcement, attorneys, or the court system that you thought was unfair or unpleasant or not handled appropriately? _____ Yes _____ No

IF YES, please explain: _____

43. Tell us about your best or worst experience with law enforcement.

44. There will be law enforcement testimony in this trial. Do you feel that you would give the testimony of police officers any more or less credibility than the testimony of any other witness simply because of their occupation?

_____ Yes _____ No

IF YES, please explain: _____

45. Have you ever testified in a criminal case as a witness? _____ Yes _____ No

IF YES, please explain: _____

46. Do you have any family members or close friends who are employed with a law enforcement agency or involved with our court system? _____ Yes _____ No

IF YES, please explain your answer: _____

PRIOR JURY EXPERIENCE

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

IF YES: Please answer the following.

State court	_____	Number of times	_____	Date	_____
Federal court	_____	Number of times.	_____	Date	_____
Civil case	_____	Number of times	_____	Date	_____
Criminal case	_____	Number of times	_____	Date	_____

How many times did you deliberate and reach a verdict? _____

Were you ever the foreperson? _____ Yes _____ No

Was there anything about your prior jury experience that makes you wonder whether you could fairly and impartially act as a juror in this case? _____ Yes _____ No

IF YES, please explain: _____

TRIAL PUBLICITY

The defendant in this case, Officer Jeronimo Yanez, is charged with Manslaughter in the Second Degree for the death of Philando Castile in Falcon Heights, Minnesota, on July 6, 2016. He is also charged with two counts of Dangerous Discharge of a Firearm from the same incident, endangering Diamond Reynolds and a minor. Officer Yanez has pled not guilty and is presumed to be innocent of each of these charges unless and until he has been proven guilty beyond a reasonable doubt under the facts and law to be applied.

48. If you have heard about this case from television, radio, newspapers, magazines, the Internet, social media or other sources, please check those sources listed below that reflect the source of your information.

_____ Television _____ Tabloids _____ Radio _____ Internet _____ Newspapers
_____ Internet Chat Rooms _____ Magazine _____ Family and Friends
_____ Facebook _____ Twitter _____ LinkedIn
_____ Any Other Social Media (please identify) _____

49. How would you describe the amount of media and other coverage that has come to your attention about this case?

_____ I believe I know exactly what happened in this case.
_____ A great deal
_____ Quite a bit (read many articles or TV stories)
_____ Moderate amount (just basic coverage)
_____ Little (basically, just heard about it)
_____ None (never heard of this case)

50. What, if anything, do you remember reading or hearing about this case? Please be specific.

51. If you have heard about this case, what sticks out in your mind about what you read, heard or saw about Philando Castile, the person who was shot?

52. If you have heard about this case, what sticks out in your mind about what you read, heard or saw about Diamond Reynolds, the person who is alleged to have been endangered?

53. If you have heard about this case, what sticks out in your mind about what you read, heard or saw about Officer Jeronimo Yanez, the defendant?

54. Have you had any conversations with family members, friends, co-workers, or other people you know about this case? _____ Yes _____ No

IF YOU ANSWERED YES, have any of those people ever expressed to you an opinion on the guilt or innocence of Officer Yanez in this case?

_____ No _____ Yes

IF YOU ANSWERED YES, have you ever expressed an opinion on the guilt or innocence of Officer Yanez in this case?

_____ No _____ Yes

INTERESTED PARTIES AND ATTORNEYS INVOLVED IN THE CASE

55. Have you ever known or met Officer Jeronimo Yanez, any members of the Saint Anthony Police Department, any Agent or Employee of the Bureau of Criminal Apprehension, Philando Castile, Diamond Reynolds, any of their family, friends, or anyone else who has personal or first hand information about this situation or was involved in any way? _____
Yes ___ No

IF YES, please explain: _____

56. The state is represented in this case by Assistant County Attorneys Richard Dusterhoft, Clayton Robinson and Jeffrey Paulsen. The defendant is represented by attorneys Thomas Kelly, Paul Engh and Earl Gray. Do you know any of these attorneys? ___ Yes ___ No

IF YES, please identify the attorney(s) you know and your relationship or knowledge of them: _____

CONCLUDING QUESTIONS

57. During the course of this trial you will be instructed by the judge as to the relevant law which you will be required to follow. You must follow the law as given to you by the judge, without exception. Is there any reason you feel you could not follow the judge's instructions?

58. Do you have any religious, philosophical, or moral beliefs that will not permit you to sit in judgment of another person? _____ No _____ Yes

IF YES, please explain: _____

59. What is your opinion of the American criminal justice system and why?

60. Is there any matter not covered by this questionnaire that should be brought to the attention of the attorneys and the court because it would affect your ability to be a fair and impartial juror? _____ Yes _____ No

IF YES, please explain: _____

Attached to this questionnaire is a list of potential witnesses who may be mentioned or called to testify in this case. **Please review the list of names carefully** and place a check mark next to the name of any person you may be familiar with.

Again, you shall not discuss this questionnaire or any matter relating to this case with anyone, without exception, until the case is over and the court advises you that you have been excused.

I affirm, under penalty of law, that I answered truthfully and completely all questions in this questionnaire to the best of my knowledge and belief and understand that it is a violation of law not to do so.

Signature

Date

***Home phone number:** _____

***Work phone number:** _____

*Phone numbers are requested in the event the court needs to contact you.

Potential witnesses or people who may be mentioned in trial.

(Note: Not all of the below will be called to testify):

Joseph Adams	Roseville Police Department
Renee Adrian	Minnesota State Patrol
Shannon Alexander-Banaszweski	White Bear Lake, MN
Bryan Anderson	Roseville Police Department
Randall Axtell	Saint Paul Police Department
Dr. Andrew Baker	Hennepin County Medical Examiner
Sheryl Benning	South Saint Paul, MN
Mikias Asfaw Beyene	Lauderdale, MN
Valerie Castile	Robbinsdale, MN
Shelby Conlon	Blaine, MN
Joseph Cooksley	Bureau of Criminal Apprehension
Juan Cortez	Saint Paul Fire Department
Grant Datillo	Roseville Police Department
Shannon Diedrich	Saint Paul Police Department
Dan Diegnau	Saint Anthony Police Department
James Diehl	Ramsey, MN
Allison Dolenc	Bureau of Criminal Apprehension
Carolyn Donarski	Bureau of Criminal Apprehension
Joseph Dutton	Plymouth, MN
Dr. Kristin M. Engebretsen	Cannon Falls, MN
Elliot Erdman	Saint Anthony Police Department
Sarah Fagerness	Hennepin County Medical Center
Nina Fateyenko	Hennepin County Medical Center
Michelle Frascone	Bureau of Criminal Apprehension
Lindsey Garfield	Bureau of Criminal Apprehension
Anna Miriam Garnaas-Halvorson	Saint Paul, MN
Larry Goodman	Saint Paul Fire Department
Chris Hagel	South Saint Paul, MN
Douglas Haider	Ramsey County Sheriff's Office
Luke Hanegraaf	Bureau of Criminal Apprehension
Glenn Hardin	Saint Paul, MN
Erica Henderson	Bureau of Criminal Apprehension
Douglas Henning	Bureau of Criminal Apprehension
Corey Hentig	Shakopee, MN
Shane Hess	Saint Anthony Police Department
Brian Thomas Hooshangh-Darouie	Saint Paul, MN
Cody Horner	Bureau of Criminal Apprehension
Michael Huddle	Saint Anthony Police Department
Katherine Igowsky	Bureau of Criminal Apprehension
Daniel Johnson	Saint Anthony Police Department
Zachary Johnson	Saint Paul Fire Department
Greg Joswiak	Inver Grove Heights, MN
Joan Joswiak	Inver Grove Heights, MN
Mike Kaneko	Bureau of Criminal Apprehension

Emanuel Kapelsohn	Fogelsville, PA
Michael Katzovitz	Bureau of Criminal Apprehension
Joseph Kauser	Saint Anthony Police Department
Martin Koolen	Bureau of Criminal Apprehension
Joe Lemke	New Brighton, MN
Jon Mangseth	Saint Anthony Police Department
Ben Mauthe	Minneapolis, MN
Mike Mauthe	Minneapolis, MN
Dave Minkel	Blaine Police Department
Scott Mueller	Bureau of Criminal Apprehension
Shannon Munson	Andover, MN
Mark Nielsen	Bureau of Criminal Apprehension
Jeffrey Noble	Rancho Santa Margarita, CA
William O'Keefe	Minneapolis, MN
Christopher Olson	Bureau of Criminal Apprehension
JA Olson	Anoka County Sheriff's Office
Carrie Ostrue	South Saint Paul, MN
Josh Ostrue	South Saint Paul, MN
Todd Ostrue	South Saint Paul, MN
Michael Paider	Saint Paul Fire Department
Nathaniel Pearlson	Bureau of Criminal Apprehension
William Persell	Orono Police Department
C. Michael Phill	Bureau of Criminal Apprehension
Mike Pritzlaff	Bureau of Criminal Apprehension
Dennis Randall	Bureau of Criminal Apprehension
Diamond Reynolds	Saint Paul, MN
Dr. Robert Rivard	Hennepin County Medical Center
Kiel Ruston	Saint Anthony Police Department
Amanda Schuman	Hennepin County Medical Center
Jeffrey Spiess	Saint Anthony Police Department
James South	Saint Anthony Police Department
Jeremy Sroga	Saint Anthony Police Department
Tressa Sunde	Saint Anthony Police Department
Juan Toran	Roseville Police Department
Eric Torgerson	Saint Paul Fire Department
Toni Vang	Blaine, MN
Zachary Weisner	Roseville Police Department
Daniel Wellman	Ramsey, MN
Dan Willems	West Saint Paul, MN
Kathy Willems	South Saint Paul, MN
Steve Willems	South Saint Paul, MN
Haivy Yang	Roseville Police Department