

NAME: _____

JUROR NO. _____

COPY

IN THE EIGHTEENTH JUDICIAL DISTRICT
DISTRICT COURT, SEDGWICK COUNTY, KANSAS
CRIMINAL DEPARTMENT

THE STATE OF KANSAS,)
Plaintiff,)
)
vs.)
)
SCOTT P. ROEDER,)
Defendant.)
)
_____)

Case No. 09CR1462

JURY QUESTIONNAIRE

INTRODUCTORY COMMENTS

Thank you for meeting your responsibilities of citizenship by being here today.

The purpose of taking your time today is to look at your qualifications to be a juror in your court system. There will be no right or wrong answers to the questionnaire. The only right answers are complete and honest responses to all questions. The purpose of using this questionnaire is three-fold. The first is to gain full and honest responses from you without revealing that information to the entire panel of jurors in open court. This will protect the confidentiality of your responses. Second, the questionnaire will spare you the long wait that usually occurs when the attorneys must repetitiously ask all of you the same questions. Finally, the use of this questionnaire provides each side the opportunity to select a fair and impartial jury. Therefore, your full cooperation is of the greatest significance to the administration of justice in the case.

The answers you give to the questions here are under a penalty of perjury. Each answer must be true and correct to the best of your knowledge, information and belief. Complete answers will save the Court and all parties involved a great deal of time.

You must not discuss the questions or your answers with anyone before, during or after the completion of the questionnaire. This includes all family and friends. Do not assume that answers given will qualify or disqualify you from jury service. Please print or write legibly. Answer honestly.

If a question goes to something that is not applicable to you, write N/A in the space provided for an answer. If you do not know the answer, write DO NOT KNOW. If you need more space to write your answer, please do so on the extra sheets attached to the questionnaire. Be sure to write the number of the question that you are answering on the blank sheet. If you do not understand the

question, just write DO NOT UNDERSTAND.

The completed questionnaire will become part of the court's records. The judge, the lawyers and the parties all examine the records. The attorneys are under orders to maintain the confidentiality of any information they learn in the course of reviewing these questionnaires.

One's past experience viewed in light of the facts of the case is the best measure of one's qualifications to serve as a juror in a particular case. By this questionnaire, we shall look into your personal experiences, your "court" type experiences, any "law enforcement" type experiences that you may have had and any experience that you have had similar to the case to be tried.

Plaintiff and Defendant are legal words. Plaintiff means the person or entity that brings a lawsuit. Defendant means the person or entity that a lawsuit is brought against. The State of Kansas is the plaintiff, and brings the lawsuit here. The plaintiff-state claims that the defendant has violated the laws of the State. The defendant denies the State's claim.

It is the law that the claims of the State must be proved beyond a reasonable doubt because the defendant is protected by a rule of law called the presumption of innocence. That rule means that anyone accused of a crime is presumed to be innocent of that crime. This presumption of innocence protects an accused at the time the State files a case. It stays with a defendant all through the case unless the jury finds guilt beyond a reasonable doubt. Such a finding by a jury must be based upon the evidence presented in court and the law of the case as explained by the judge. It must never be based upon bias or prejudice or influences outside the evidence and law of the case.

Here summarized are the claims of the State:

In the Complaint/Information, the prosecution alleges that on or about the 31st day of May, 2009, in Sedgwick County, Kansas, Scott P. Roeder unlawfully, intentionally and with premeditation killed George R. Tiller.

In the Complaint/Information, the prosecution alleges that on or about the 31st day of May, 2009, in Sedgwick County, Kansas, Scott P. Roeder unlawfully and intentionally placed another person, to-wit: Gary L. Hoepner, in reasonable apprehension of immediate bodily harm, with a deadly weapon, to-wit: a handgun.

In the Complaint/Information, the prosecution alleges that on or about the 31st day of May, 2009, in Sedgwick County, Kansas, Scott P. Roeder did then and there unlawfully and intentionally placed another person, to-wit: Keith E. Martin, in reasonable apprehension of immediate bodily harm, with a deadly weapon, to-wit: a handgun.

QUALIFICATIONS

To be selected to serve on a jury one must meet the following qualifications:
(Please answer yes or no)

1. Are you at least 18 years of age? _____
2. Are you a resident of Sedgwick County? _____
3. Are you a resident of the State of Kansas? _____
4. Are you a citizen of the United States of America? _____
5. Are you able to read, write and understand the English language? _____
6. Have you been adjudged guilty, pleaded guilty or no contest to a felony crime within the last ten (10) years? _____
7. Have you been found incompetent by a judge? _____
8. Have you served as a juror in the county within one year? _____

GENERAL BACKGROUND

9. Name/Maiden Name _____
10. Age _____
11. Race _____
12. Place of birth _____
13. Street Address _____

Nearest Major Intersection _____

14. How long have you lived at your current address? _____
15. How long have you lived in Sedgwick County, Kansas? _____
16. Do you own or rent your home? Yes _____ No _____

If neither, please explain.

17. What is the highest level of education completed?

Less than High School _____

High School Graduate _____

Vocational/Technical _____

Business school _____

Secretarial /Paralegal _____

Community College: 1 year _____ 2 years _____ 3 years _____

Name and location: _____

Four year college _____

Name, location, and number of years completed, degrees received, if any.

Post-graduate _____

Name, location and number of years completed:

EMPLOYMENT

18. Do you work outside the home? Yes _____ No _____

If yes, where: _____

Please list specific duties: _____

How long have you been with your present employer? _____

19. Have you had any previous occupations? Yes _____ No _____

If yes, please list all employers, dates of employment, titles and responsibilities:

20. If employed, will you be paid by your employer while on jury duty? Yes _____ No _____

21. Will jury duty cause you any undue financial hardship? _____

If yes, please explain: _____

SOCIAL/CIVIC BACKGROUND

22. Do you belong to any civic or social organizations? Yes _____ No _____

If yes, please explain and describe:

23. Do you do any type of volunteer work? Yes _____ No _____

If yes, please explain: _____

24. What are your hobbies or interest outside of work and family? _____

25. Have you any connection to groups that lobby for changes in the law? Yes _____ No _____

If you do, what group and what part do you play in the lobbying efforts? _____

MARITAL STATUS

26. Please check the following that apply:

Single _____ Married _____ Separated _____

Widowed _____ Divorced _____ Living with non-marital mate _____

27. If married or with mate, for how long?

28. If your spouse or mate is employed, please describe what type of work they do, including name and location of employer, and length of time at the position: _____

29. If your spouse or mate is retired, presently unemployed or disabled, please address the requested information above for the last job he/she held.

CHILDREN

30. If applicable, please list the names, ages and gender of your children .

Name	Age	Male/Female
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31. If applicable, please list the highest educational level and occupation of your children.

RELIGION

32. What is your religious affiliation/denomination, if any? _____

33. Do you attend a place of worship; i.e., Church, Temple, etc? Yes ____ No ____

If yes, please state where and how often: _____

34. If applicable, do you participate in other activities in your place of worship? Yes ___ No ___
If yes, please state the type of activities and how frequently: _____

35. If married or living with a mate, please describe their religious preference:

36. If applicable, does your place of worship and/or particular denomination take an official stand on the practice of abortion? Yes ___ No ___ Unsure ___

37. How would you rate the importance of your religious beliefs in your day to day life?

- _____ Utmost Important
- _____ Very important
- _____ Somewhat important
- _____ Not important at all

38. Do you have any principles based on religious or ethical teaching or dogma that would affect your ability to serve as a fair and impartial juror? Yes ___ No ___

If yes, please explain: _____

MILITARY SERVICE

39. Have you ever served in the military? Yes ___ No ___

If yes, when: _____

Where: _____

Branch: _____

Highest Rank: _____

Your duties: _____

Type of discharge and when: _____

Were you ever engaged in combat? Yes ____ No ____

Were you ever involved in a military court martial? Yes ____ No ____

If yes, explain: _____

FIREARMS

40. Have you ever fired a handgun or rifle? Yes ____ No ____

41. Are you or a member of your immediate family a past or present member of the National Rifle Association? Yes ____ No ____

If yes, please indicate who and during what period of time.

42. Have you specialized knowledge of the use, operation or identification of firearms?
Yes ____ No ____

If so, what is the source of this knowledge? _____

Do you feel that you are qualified as a firearms expert based on your specialized knowledge?
_____.

43. Do you now or have you ever owned firearms? Yes ____ No ____

If you own guns currently, what use is made of the guns? i.e. hunting, collecting, protection, etc. _____

Do you shoot on a regular basis? _____

HEALTH

44. Do you have any specific health problem of a serious nature that might make it difficult or uncomfortable for you to sit as a juror in this case? Yes ____ No ____

If yes, please explain: _____

45. Are you taking medication regularly that might make it difficult for you to pay attention or concentrate for long periods of time? Yes ____ No ____

If yes, please explain: _____

WITNESS EXPERIENCE

46. Have you ever testified as a witness in a criminal or civil case? Yes ____ No ____

If yes, please explain: _____

COURT EXPERIENCE

47. Have you, a friend, a relative, or anyone you know ever been arrested for or convicted of a felony? Yes ____ No ____

If yes, please explain: _____

48. Have you ever been a party to a lawsuit or filed a claim against a governmental agency?

Yes ____ No ____

If yes, please explain: _____

VICTIM EXPERIENCE

49. Have you, or any member of your family, or a close friend ever been a victim of a crime?

Yes _____ No _____

If yes, please explain: _____

50. Have you, a friend, a relative, or anyone you know been seriously injured or killed as a result of criminal conduct? Yes _____ No _____

If yes, please explain: _____

If yes, please explain how that experience has affected your feelings about the criminal justice system. _____

ADMINISTRATION OF JUSTICE

51. Have you, any member of your family, or a close friend ever taken a course in administration of justice, or studied law? Yes _____ No _____

If yes, please explain: _____

52. Have you, any member of your family or a close friend ever been affiliated with any of the following?

Law Enforcement (police officer, Sheriff, F.B.I., etc) _____

Corrections (Prison Guard, Jailer, Warden, etc) _____

Security Employment _____

Mental Institution _____

Juvenile Facilities _____

Probation or Parole _____

District Attorney, United States Attorney, or other prosecutor _____

Public Defender or Private Defense Counsel _____

Law School _____

Investigative work _____

Immigration Services _____

Drug Enforcement Administration _____

Please explain the ones you've checked. _____

53. Looking at all the experience that you have had with law enforcement, is there anything about your experience that has created in you a bias for or against law enforcement that might affect your ability to fairly evaluate the evidence that comes into the case through a law enforcement officer, should you be chosen to serve in the case? Yes _____ No _____
If yes, please explain _____

54. Is there a crime prevention group in your neighborhood? Yes ____ No ____

If so, do you participate in the group? _____

55. Do you perceive there to be any problems in the current operation of the criminal justice system? Yes _____ No _____

If yes, please elaborate on your answer: _____

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56. Do you know of any reason that would prevent you from following the law that the judge says applies to this case? Yes _____ No _____

If yes, what is the reason? _____

SPECIAL STUDIES

57. Do you have experience in the gathering, maintaining, preserving, preparation or analysis of specimens for forensic purpose? This would be tool marks, fingerprints, hair, blood, saliva, bullets, shell casings, drugs etc. Yes _____ No _____

If you have such experience, please tell us the details. _____

58. Do you have specialized knowledge of DNA science? Yes _____ No _____

If you do, tell us the source of this specialized knowledge. _____

59. Do you have experience in the study of or the application of law? Yes _____ No _____

If you do, tell us about that experience? _____

60. Have you had training, education or experience in psychiatry or psychology?

Yes _____ No _____

If yes, please tell us of your training, education or experience. _____

PRIOR JURY SERVICE

61. Have you ever been called for jury duty prior to this action? Yes _____ No _____

If yes, please explain when, where, and what type of case you heard. _____

Were you able to reach a verdict? Yes ____ No ____

Were you the jury foreperson? Yes ____ No ____

Tell us if you view your prior service in a positive, neutral or negative manner?

Please explain. _____

Did you talk to the Judge, or the attorneys after the case was over, and learn of additional information that was not presented at trial? Yes ____ No ____

If so, please explain. _____

NEWS SOURCES

62. Do you read a newspaper on a regular basis, i.e., three or more times per week?

Yes ____ No ____

If yes, please list which newspaper(s) you regularly read:

Wichita Eagle _____

USA Today _____

Wall Street Journal _____

Kansas City Star _____

Other ____ Please describe: _____

63. Do you subscribe to the newspaper, or do you purchase the paper with each reading or do you read someone else's copy?

Subscribe ____ Purchase ____ Read someone else's copy _____

64. Do you or anyone in your immediate household have a subscription to any weekly or monthly magazines or newsletters? Yes ____ No ____

If yes, please list all magazines and length of time receiving the subscription.

65. How often, if ever, do you watch the local television news?

- Never _____
- Occasionally _____
- Regularly _____
- Nightly _____

If you answered occasionally, regularly or nightly please disclose what local station's news programs you watch. Channel(s) _____ 6:00 _____ 10:00 _____

66. Please list any and all national or syndicated news programs you watch, including such programs as network news, 48 hours, Hard Copy, etc.

67. Please disclose any and all news channels you watch. (one or more times a week)

- CNN _____
- Headline News _____
- Fox News _____
- CBN _____
- CBS _____
- ABC _____
- NBC _____
- MSNBC _____
- Other _____

68. Do you receive any of your news information from Internet Sites: Yes _____ No _____

If yes, please provide details such as source and frequency _____

69. Do you believe there is an ideological bias in the various news sources?

Yes _____ No _____

If so, how? _____

CASE AT HAND

70. Are you now or were you personally acquainted with George Tiller or a family member of George Tiller? Yes _____ No _____

If yes, please print the name here and tell us about your relationship with the person.

71. Are you now or were you personally acquainted with Gary L. Hoepner or a family member of Gary L. Hoepner? Yes _____ No _____

If yes, please print the name here and tell us about your relationship with the person.

72. Are you now or were you personally acquainted with Keith E. Martin or a family member of Keith E. Martin? Yes _____ No _____

If yes, please print the name here and tell us about your relationship with the person.

73. Are you personally acquainted with defendant, Scott P. Roeder, or any family member or friend of his? Yes _____ No _____

If you are, please print the name of such person here and tell us about your relationship with the person. _____

74. Here are the names of the lawyers in the case. Please circle the name of anyone known to you personally and tell us of your relationship with that lawyer.

- Nola T. Foulston
- Kim T. Parker
- Ann Swegle
- Mark Rudy
- Steve Osburn

75. A list is attached containing the names of people who may be called as witnesses in this case.

Please review the list. Circle the name of any witness you know or think you might know.

Then write the name here and tell us about your relationship with the person.

MEDIA

Most people here today know something about the facts of this case. The purpose of the next few questions is to look at what you know about this case.

If you are a witness in the case because of what you know about the facts, you would be disqualified to be a member of the jury.

If your knowledge of the facts comes from what you have heard or seen or read in news reports or in some political advertisement, commentaries or editorials, you are not disqualified for jury duty.

76. Prior to the date of Dr. George Tiller's death (May 31, 2009), had you ever heard of Dr. Tiller, either through the media, political publications, word of mouth, or otherwise?

Yes ____ No ____

If yes, please explain: _____

77. After the death of Dr. George Tiller, to what degree did you follow the events of his demise and the subsequent arrest of the defendant?

Not at all, do not know anything about the case _____

Causally, not sure of any facts or surrounding circumstances _____

Mildly interested, read the "headlines," have knowledge of the facts _____

Closely, I read the stories and/or watched the news, know the facts pretty well _____

Intensely, I followed the case as closely as I could _____

None of the above _____

Please explain further: _____

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78. What, if any, information have you learned through the media or other sources regarding the defendant in this case, Scott Roeder? Please be as specific as possible. _____

79. Do you have any knowledge, other than from the print or electronic media, about the facts and circumstances surrounding this case? Yes ____ No ____

If yes, please explain in detail: _____

80. Since the death of Dr. George Tiller have you had any conversations with anyone regarding the facts and circumstances surrounding this case? Yes ____ No ____

If yes, please explain: _____

81. Have you seen, read or heard news reports of this case? Yes _____ No _____

If yes, please list the source as best you recall (newspaper, television, radio, etc.).

82. Have you heard, seen or read about this case being used in a political advertisement, commentary or editorial?

Yes _____ No _____

If yes, tell us the source and message attempted to be conveyed, as best you can recall.

83. If you have formed opinions based on information drawn from news reports and/or political advertisements, commentaries or editorials, is your opinion on the question of innocence or guilt of the accused so set in your mind that you could not set the opinion aside in deference to the law? Yes _____ No _____

84. Should you be chosen to serve in this case, would you base your verdict on the evidence presented in court and the instructions of law given you by the judge rather than on information you remember from news reports or political advertisements, commentaries or editorials?

Yes _____ No _____

If yes, please explain: _____

85. It is anticipated that there will be both local and national coverage of the trial in a gavel to gavel fashion. If selected as a juror on this case, would the scrutiny of the trial and the accompanying pressure in any way cause you to feel concerned or compromised in the fulfillment of your duties? Yes _____ No _____

If yes, please explain: _____

ABORTION

86. What are your personal opinions on abortion? _____

GENERAL

87. Do you hold any beliefs that would prevent you from following the law of the State of Kansas and the instructions of the court? Yes _____ No _____
If so, please explain. _____

88. Are there any other topics, other than those addressed in the various questions listed above, that you feel need to be brought to the Court's attention relative to your ability to serve as a fair and impartial juror in this case? Yes _____ No _____
If yes, please explain: _____

JUROR NO. _____

AFIRMATION:

I declare under the pains and penalties of perjury that the answers and information given by me on this questionnaire are true to the best of my information, knowledge and belief.

Date: _____

Signature: _____

Print Name