



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKP
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 2, 2019

By ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter attaching the government's proposed juror questionnaire, which is largely agreed-upon by the parties. The parties will confer on Exhibit A and submit that to the Court no later than tomorrow. The government respectfully requests permission to provide the Court with proposed Exhibit A under seal because it will contain the name of victims and others who have not been publicly identified.

The parties also jointly request that the Court issue an order preventing public release of prospective jurors and empaneled jurors' names until after trial and requiring that jurors be identified only by juror number in open court. See United v. Shkreli, 15-CR-637

JUROR NO. _____

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X

UNITED STATES OF AMERICA

-v-

18 CR 204 (S-2) (NGG)

**KEITH RANIERE,
also known as “Vanguard,”
“Grandmaster,” and
“Master,”**

**CLARE BRONFMAN,
ALLISON MACK,
KATHY RUSSELL and
LAUREN SALZMAN,**

Defendants.

-----X

**HON. NICHOLAS G. GARAUFIS
UNITED STATES DISTRICT JUDGE**

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK
225 CADMAN PLAZA EAST
BROOKLYN, NEW YORK**

JURORS ARE INSTRUCTED TO CALL: 1-800-522-5100

ON [DATE], AFTER 7 P.M.

FOR FURTHER REPORTING INSTRUCTIONS.

JUROR NO. _____

United States v. Raniere, et al.
18 Cr. 204 (S-2) (NGG)

JUROR INFORMATION SHEET

Please complete the following:

Name: _____

Address: _____

Home Phone: _____

Work Phone: _____

Cell Phone: _____

WHEN YOU HAVE COMPLETED THE QUESTIONNAIRE, PLEASE COMPLETE THE FOLLOWING DECLARATION:

DECLARATION

I solemnly state that my answers to the questions set forth in the attached questionnaire are, to the very best of my ability, true and correct.

Date: _____

(Signature)

JUROR NO. _____

United States v. Raniere, et al.
18 Cr. 204 (S-2) (NGG)

JUROR QUESTIONNAIRE
PRELIMINARY INSTRUCTIONS

Upon your oath or affirmation, you must give true and complete answers to all questions. These questions are not meant to ask unnecessarily about personal matters. Rather, these questions will help the Court determine whether you can be fair and impartial in deciding this case and will also provide information about you as a juror to help the parties select a jury. Remember there are no “right” or “wrong” answers; there are only truthful answers. 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 COURT INSTRUCTS YOU NOT TO DISCUSS THE QUESTIONS AND ANSWERS WITH FELLOW JURORS. IT IS VERY IMPORTANT THAT YOUR ANSWERS BE YOUR OWN INDIVIDUAL ANSWERS. Further, the Court instructs you not to discuss anything about the case with anyone: not the defendant, the lawyers, your fellow jurors, your family, your friends, or anyone else. Please try to write as legibly as possible. It is very important that the answers be yours and yours alone.

Please place an asterisk (*) next to any answers where—to the extent the Court or parties have any follow-up questions—you would want to have the additional discussion in private.

JUROR NO. _____

SUMMARY OF THE CHARGES

You are being considered to serve as a juror in a criminal case. Jury selection is scheduled to begin on approximately April 15, 2019, and trial is expected to begin shortly thereafter. Trial is expected to take approximately eight-to-ten weeks once a jury is selected. The defendants are charged in an indictment with criminal offenses. An indictment listing the criminal charges against a defendant is simply the document used to advise a defendant of the accusations against him. The indictment is not evidence.

The law presumes that all of the defendants are innocent. The defendants have pleaded not guilty to all charges in the indictment. It is the government that has the burden of proof under our system of law. The prosecution must come forward with proof beyond a reasonable doubt that a defendant has committed crimes before a defendant can be found guilty. The defendants have no obligation to produce any evidence or do anything else at trial. This is because the law presumes a defendant to be innocent of the charges brought against him.

The following is a summary of the charges in this case. The Indictment in this case charges that the defendants are members of a criminal organization known as the “Enterprise” and that they committed a variety of crimes as part of that criminal enterprise, including racketeering and racketeering conspiracy involving acts of—among other things—identity theft, wire fraud, obstruction of justice, visa fraud, forced labor, sex trafficking, extortion, money laundering, child exploitation and possession of child pornography. Certain defendants are also charged with additional crimes including sex trafficking, sex trafficking conspiracy, attempted sex trafficking, forced labor conspiracy and wire fraud conspiracy,

Remember that under the law an indictment is not evidence, it is merely an accusation, and that a defendant is presumed to be innocent of the charges described in an indictment unless and

JUROR NO. _____

until the government establishes a defendant's guilt beyond a reasonable doubt. If you are selected as a juror in this case, it will be your duty to determine whether, based solely on the evidence presented at trial, the government has proved beyond a reasonable doubt that the defendant is guilty of the specific crimes charged.

QUESTIONNAIRE AND JURY SELECTION

As noted, the purpose of this questionnaire is to assist the Court and the parties in selecting a jury of individuals that can be fair and impartial. Because this case has generated media attention, the Court and the parties are taking steps to maintain the privacy of jurors and potential jurors. [The Court has issued an order concealing the names of jurors from anyone other than the parties until after trial in this case.] It is important to ensure that the jury will in no way be influenced by the public, by the members of the media and their articles and reports. The Court is taking these measures to protect your right to privacy and to assist you in discharging your responsibility as a juror fairly and impartially. You will be referred to by your juror number when in open court.

PART I: HARDSHIP
(Questions 1 through 3)

Jury selection will begin on April 15, 2019, and the trial is expected to begin on April 29, 2019. We anticipate the trial should last approximately eight-to-ten weeks. Trial will be in session, generally speaking, Monday through Thursday from 9:30 a.m. to 5:30 p.m. The trial will recess for national and major religious holidays. Jurors will receive a printed schedule of trial dates upon final selection of the jury.

JUROR NO. _____

If you are selected as a juror, you will be required to be present for the taking of testimony for as long as the case lasts. There are no plans to sequester the jury, meaning you will go home every day after court.

The Court views service on a jury in a federal criminal trial to be one of the highest duties a citizen owes to the United States. Mere inconvenience or the usual financial hardships of jury service will not be sufficient to excuse a prospective juror.

1. Do you have an unusual financial hardship or other serious problem that would prevent you from serving as a juror in this case?

Yes _____ No _____

If yes, please explain:

If yes, are there any arrangements that you can make to alleviate the hardship:

JUROR NO. _____

2. Do you have any physical or medical condition (such as hearing, eyesight, or back problems), or any emotional problem, that would make it unusually difficult for you to serve as a juror in this case?

Yes _____ No _____

If yes, please describe:

3. Do you take any medications or have any condition that may interfere with your ability to concentrate?

Yes _____ No _____

If yes, please list medication(s) and effects:

PART II: BACKGROUND
(Questions 4 through 46)

Part II asks questions about you, your background and very general questions about your family.

4. Do you have any difficulty reading or understanding English?

Yes _____ No _____

If yes, please explain:

5. If you speak any other languages, please list and describe level of fluency: _____

6. What is your age? _____

JUROR NO. _____

7. Are you: Male _____ Female _____

8. Where were you born? _____

Where were you raised? _____

Where were your parents born? _____

9. Are you:

Married _____

Living with a Partner _____

Single _____

Divorced/Separated _____

Widow/Widower _____

10. Do you:

Own a home? _____

Rent? _____

Live in a dwelling owned by relatives? _____

Live in a dwelling with your family? _____

Other than spouse or partner, who lives with you? (Do not mention their names; rather, indicate what their relationship is with you, e.g., “roommate” or “parent.”)

What is their employment? _____

11. If you live in Brooklyn, Queens or Staten Island, in what area or neighborhood do you live (e.g., Canarsie, Jackson Heights, Stapleton)?

12. If you live in Nassau or Suffolk County, in what community do you live?

13. What other areas or neighborhoods have you lived in over the past 10 years?

JUROR NO. _____

14. Are you (check any and all that apply):

Employed full-time? _____ Retired? _____

Employed part-time? _____ Disabled and unable to work? _____

Work at home? _____ Student? _____

Homemaker? _____ If a student, what area of study?

15. If you are employed by another, please answer the following:

(a) Where do you work and what type of work do you do?

(b) How long have you worked in your present job? _____

(c) Do you supervise others in your job?

Yes _____ No _____

If yes, how many? _____

For how long have you been a supervisor? _____

(d) Are you a member of a union?

Yes _____ No _____

If yes, which one and how long? _____

16. If you are self-employed, please answer the following:

(a) What is the name of your business and what type of business is it?

JUROR NO. _____

(b) How long have you been self-employed? _____

17. If you are retired or unemployed, what type of work did you last do?

18. What is your annual income level? If you are married and your spouse/partner is employed, please include his/her income:

- Less than \$25,000 _____
- \$25,000 - \$50,000 _____
- \$50,000 - \$100,000 _____
- \$100,000 - \$150,000 _____
- Over \$150,000 _____

19. How far did you go in school?

- Elementary School: Yes _____ No _____
- High School: Yes _____ No _____
- Grade Completed: _____ G.E.D. _____
- College: Yes _____ No _____
- Level Completed: _____
- Post Graduate: Yes _____ No _____

If you earned a degree after high school, what was your major area(s) of study?

20. If you are married or have a partner, please answer the following questions about your spouse/ partner's employment:

(a) Is your spouse/partner employed? _____

If so where and what type of job? _____

JUROR NO. _____

(b) If your spouse/partner is retired or not employed, please indicate this and also describe the type of work he or she did during his/her last period of employment:

21. Do you identify with any political party?

Yes _____ No _____

If yes, which one(s)? _____

What politician(s) do you most admire? _____

22. Do you identify with any particular faith or spiritual movement?

Yes _____ No _____

If yes, which one(s)? _____

Please describe your level of religious observation/spiritual practice.

23. Have you or any member of your family or close friends worked for or applied for a position in the U.S. Attorney's Office, the District Attorney's Office, the Federal Bureau of Investigation, the Immigration and Naturalization Service, the Department of Homeland Security, the Internal Revenue Service, U.S. Immigration and Customs Enforcement, the New York State Police, New York City Police Department, or any other federal, state or local law enforcement agency?

Yes _____ No _____

If yes, please state who (relation to you), what agency, when and for how long when, and position or involvement?

JUROR NO. _____

24. Have you or any member of your family or close friends worked or applied for a position with any jail, detention center, probation services, a city or county attorney's office, Attorney General, or a court?

Yes _____ No _____

If yes, please state who (relation to you), what agency, when and for how long when, and position or involvement?

25. Have you ever worked in the following fields or have you ever had any training or taken any courses, special training or seminars in any of the following (check all that apply):

- ____ Law
- ____ Criminal Justice
- ____ Criminology
- ____ Psychology
- ____ Psychiatry
- ____ Social Work
- ____ Mental Health
- ____ Philosophy
- ____ Religion
- ____ Computer programming
- ____ Tax

If yes, please explain your experience:

If someone close to you has experience in any of the above, please explain:

26. (a) Have you ever served in the military?

Yes _____ No _____

If no, skip to question 27(a). If yes, then continue below.

JUROR NO. _____

(b) What branch? _____

(c) What was the highest rank you achieved? _____

(d) What did you do in the service? _____

(e) Any service in the military police?

Yes _____ No _____

(f) Any service in courts-martial as defense attorney, prosecutor, or investigator?

Yes _____ No _____

(g) Year of discharge from military? _____

(h) Did you receive an honorable discharge?

Yes _____ No _____

27. If you have any children, please answer the following:

(a) Please fill out the following chart:

<u>AGE</u>	<u>SEX</u>	<u>EDUCATION LEVEL</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

(b) Are any of your children employed?

Yes _____ No _____

(c) List the occupation(s) of your children:

JUROR NO. _____

28. (a) How do you usually get your news?

__ Newspapers. Which papers? _____

__ Radio (including talk radio). Which stations? _____

__ Television. Which stations/hosts? _____

__ Internet. Which sites? _____

__ Podcasts. Which ones? _____

__ Word of mouth. From whom? _____

Do you receive any subscriptions? If yes, please list: _____

Do you listen to any political commentators? If yes, please list:

(b) Do you have any regularly use any social networking sites such as Twitter, Facebook or Instagram?

Yes _____ No _____

If yes, please list which ones and any handles, screennames or other identifiers and describe your level of use:

(c) Do you maintain a website, a blog or a “subreddit”?

Yes _____ No _____

If yes, please provide the url:

JUROR NO. _____

(d) Do you ever post comments on any Internet forums or other websites?

Yes _____ No _____

If yes, please describe the frequency, and what you usually comment on:

(d) What were the last three books that you read?

29. What television programs do you watch regularly?

30. (a) List any hobbies and special interests that you have:

(b) Do you belong or have you belonged to any civic, social, union, professional, fraternal, political, recreation, or religious organizations, including any groups taking a position on social or legal issues?

Yes _____ No _____

If yes, please describe your experience and whether you've held an office:

JUROR NO. _____

31. (a) Other than friends and relatives, who are the three people living or dead that you admire most, and why?

(b) Other than friends and relatives, please list the three people you least admire, and why?

32. Have you or anyone close to you ever participated in any self-help programs or read any self-help books?

Yes (self) _____ Yes (other) _____ No _____

If yes, please state which program(s)/book(s) and describe your (or the other person's) experience?

If yes as to you, what did you hope to get out of the experience?

33. Have you or anyone close to you ever taken any Scientology courses?

Yes (self) _____ Yes (other) _____ No _____

JUROR NO. _____

If yes, please describe your (or the other person's) experience?

34. Have you or anyone close to you ever participated in a Landmark Forum, EST or anything you view as similar?

Yes (self) _____ Yes (other) _____ No _____

If yes, please describe your (or the other person's) experience?

35. There may be evidence in this case about people engaging in relationships with multiple sexual partners. Would hearing about that type of evidence affect your ability to serve as a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain.

36. There may be evidence in this case about abortions. Would hearing about that type of evidence affect your ability to serve as a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain.

JUROR NO. _____

37. There may be evidence in this case that includes sexually explicit images and language. Would hearing about that type of evidence affect your ability to serve as a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain.

38. There may be evidence in this case about fraternities, sororities, secret societies, rituals, or cults. Would hearing about that type of evidence affect your ability to serve as a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain.

39. There may be evidence in this case about people who were in the United States illegally. Do you have any opinions regarding illegal immigration that would affect your ability to serve as a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain.

40. There may be evidence in this case about rich individuals. Do you have any opinions regarding rich individuals that would affect your ability to serve as a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain.

JUROR NO. _____

41. There may be evidence in this case about people who did not pay taxes. Do you have any opinions regarding people who do not pay taxes that would affect your ability to serve as a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain.

42. There may be evidence in this case about skin modifications (such as tattoos and branding).

(a) Do you have any body modifications?

Yes _____ No _____

If yes, please describe.

(b) Would hearing about evidence of body modifications affect your ability to serve as a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain.

43. (a) Have you ever been:

- (i) a juror in a civil case? Yes _____ No _____
- (ii) a juror in a criminal case? Yes _____ No _____
- (iii) a grand juror? Yes _____ No _____

JUROR NO. _____

(b) If you have served on a jury, please list below

- a. The approximate date(s);
- b. Whether you served in state court or federal court;
- c. Whether it was a grand jury or a trial jury;
- d. Whether it was a criminal case or a civil case;
- e. What the general nature of the case was (for example, robbery, murder, contract, negligence, medical malpractice, etc.); and
- f. Whether or not a verdict was reached. (If so, do not state what it was)

Date	State/Federal	GJ/Trial Jury	Criminal/Civil	Nature	Reached verdict Y/N

(c) Is there anything about your prior jury service that would impact your ability to be a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain: _____

44. Are you now, or have you ever been, a registered sex offender or ordered by a court to register as a sex offender?

Yes _____ No _____

If yes, please explain.

45. Have you or has anyone close to you ever sought treatment (court-ordered or otherwise) for sex addiction or sexual deviance?

JUROR NO. _____

Yes _____ No _____

If yes, please explain.

46. Is anyone close to you a registered sex offender?

Yes _____ No _____

If yes, please explain who and the circumstances?

If yes, do you believe his/her designation as a sex offender is unfair?

**PART III: EXPERIENCES AND BELIEFS
(Questions 47 through 71)**

Part III asks questions about experiences you may have had and opinions you may have formed. Again, there are no right or wrong answers. Please be as thoughtful and candid as possible.

47. Have you or anyone close to you ever been the victim of incest, child molestation, or child abuse?

Yes _____ No _____

If yes, please explain.

48. Have you or anyone close to you ever been the victim of sexual assault, including date rape?

JUROR NO. _____

Yes _____ No _____

If yes, please explain.

49. If you answered yes to question 47 or 48, do you believe that would affect your ability to serve as a fair and impartial juror?

Yes _____ No _____

If yes, please explain.

50. Have you ever known anyone who you believe was falsely accused of sexual abuse or sexual assault of a minor or an adult?

Yes _____ No _____

If yes, please explain.

51. Do you worry about you or someone close to you being falsely accused of sexual abuse or sexual assault?

Yes _____ No _____

If yes, please explain.

52. If you answered yes to question 50 or 51, do you believe that would affect your ability to serve as a fair and impartial juror?

Yes _____ No _____

JUROR NO. _____

If yes, please explain.

53. Do you believe that people under seventeen should be able to consent to sex with adults?

Yes _____ No _____

If yes, please explain.

54. Have you heard of the “#MeToo” movement?

Yes _____ No _____

If yes, what is your opinion of the “#MeToo” movement?

55. (a) Have you or has a family member or close friend ever been a witness to or the victim of a crime?

Yes _____ No _____

If yes, please explain: _____

(b) Did you or your family member or close friend report that crime to the police or other law enforcement agency?

Yes _____ No _____

If yes, how do you feel about the way law enforcement responded?

JUROR NO. _____

If no, why didn't you (or the person close to you) report?

56. Do you have any opinions or beliefs concerning law enforcement in general – including the FBI, the Internal Revenue Service, the New York City Police Department, the Department of Homeland Security, New York State Police and the Department of Justice – that would make it difficult for you to evaluate the evidence fairly and impartially in accordance with the Court's instructions?

Yes _____ No _____

If yes, please explain: _____

57. Have you ever appeared or testified as a witness in any investigation or legal proceeding?

Yes _____ No _____

If yes, please explain the nature of the investigation or proceeding:

58. (a) 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: _____

JUROR NO. _____

- (b) If you answered “yes” to 58(a), above, is there anything about these facts that would make it difficult for you to sit as a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain: _____

59. (a) Are you or is anyone close to you, including family or friends, now under subpoena or about to be subpoenaed in any criminal case?

Yes _____ No _____

If yes, please explain:

- (b) Have you or anyone close to you ever been questioned or subpoenaed in any matter by the New York City Police, any state or local law enforcement agency, the Department of Justice or any United States investigative agency such as the Federal Bureau of Investigation, the Department of Homeland Security, the Internal Revenue Service or the Bureau of Alcohol, Tobacco and Firearms?

Yes _____ No _____

If yes, please explain: _____

- (c) If you answered yes to 59(b), above, do you believe that you (or they) were fairly treated in connection with such matter?

Yes _____ No _____

If no, please explain: _____

JUROR NO. _____

60. (a) Have you or has a family member or close friend ever been involved in or been the target of a criminal investigation?

Yes (self) _____ Yes (family/friend) _____ No _____

If yes, please generally describe the circumstances surrounding the criminal investigation(s) and your relationship(s) to the person(s) involved: _____

(b) Have you or has a family member or close friend ever been charged with a crime?

Yes (self) _____ Yes (family/friend) _____ No _____

If yes, please generally describe the circumstances surrounding the criminal investigation(s) and your relationship(s) to the person(s) involved, including whether there was any allegation of a sex-related offense: _____

(c) If you answered "yes" to (a) or (b) above, was the individual who was investigated or charged treated fairly by the criminal justice system?

Yes _____ No _____

If no, please explain: _____

(d) Do you have or have you ever had a close friend or family member in prison?

Yes _____ No _____

If yes, without mentioning names, please explain: _____

JUROR NO. _____

(e) If you answered yes to (a), (b) or (d), above, is there anything about these facts that would make it difficult for you to sit as a fair and impartial juror in this case?

Yes _____ No _____

If yes, please explain: _____

61. The Judge presiding over this case is the Honorable Nicholas G. Garaufis. Do you or does any relative or friend know or have any connection with Judge Garaufis?

Yes _____ No _____

If yes, please explain: _____

62. This case is being prosecuted by the United States Attorney's Office for the Eastern District of New York. The United States Attorney for this District is Richard P. Donoghue. Do you or does any relative or friend personally know or have any connection with Richard P. Donoghue or anyone associated with his office?

Yes _____ No _____

If yes, please explain: _____

63. Do you or does any relative or close friend know or have any connection with any of the following prosecutors, case agents and/or their assistants, or their relatives or friends?

- (i) Assistant United States Attorney Moira Penza
- (ii) Assistant United States Attorney Tanya Hajjar
- (iii) Assistant United States Attorney Mark J. Lesko
- (iv) Assistant United States Attorney Kevin Trowel
- (v) Assistant United States Attorney Karin Orenstein
- (vi) Paralegal Specialist Teri Carby
- (vii) Michael Weniger, Special Agent, FBI
- (viii) Michael Lever, Special Agent, FBI
- (ix) Delise Jeffrey, Special Agent, FBI

JUROR NO. _____

- (x) Charles Fontanelli, Task Force Officer, FBI/New York State Police
- (xi) Megan Buckley, Special Agent, Homeland Security Investigations
- (xii) Christopher Munster, Special Agent, Homeland Security Investigations
- (xiii) Richard Guerci, Investigator, U.S. Attorney's Office
- (xiv) Kathleen Fiato, Special Agent, IRS
- (xv) Patrick Griffiee, Special Agent, IRS

Yes _____ No _____

If yes, please explain: _____

64. (a) Do you or does any relative or close friend know or have any connection to the defendants, Keith Raniere, Clare Bronfman, Allison Mack or Kathy Russell, or, to your knowledge, their relatives or friends?

Yes _____ No _____

If yes, please explain: _____

(b) Have you seen, heard or read anything about this case?

Yes _____ No _____

If yes, what have you seen, heard or read, and in what source(s)?

If yes, what is your opinion on what you have seen, heard or read?

JUROR NO. _____

If yes, would you be able to follow an instruction to set aside anything you have seen, heard or read?

65. Have you or has anyone you know participated in any of the following courses or groups: Nxivm, Executive Success Programs, Jness, Society of Protectors, Ultima, Exo Eso, The Knife, The Source?

Yes _____ No _____

If yes, please explain: _____

66. (a) Do you or does any relative or close friend know or have any connection with any of the following defense attorneys and their assistants or their relatives or friends?

- (i) Marc Agnifilo, Esq.
- (ii) Teny Geragos, Esq.
- (iii) Paul DerOhannesian, Esq.
- (iv) Danielle Smith, Esq.
- (v) Mark Geragos, Esq.
- (vi) Kathleen Cassidy, Esq.
- (vii) Alexandra Shapiro, Esq.
- (viii) Fabian Thayamballi, Esq.
- (ix) Justine Harris, Esq.
- (x) Amanda Ravich, Esq.
- (xi) William McGovern, Esq.
- (xii) Sean Buckley, Esq.
- (xiii) Matthew Menchel, Esq.

Yes _____ No _____

If yes, please explain: _____

(b) Have you seen, heard or read any publicity about any of these defense attorneys?

JUROR NO. _____

Yes _____ No _____

If yes, what have you seen, heard or read: _____

67. This case is likely to receive ongoing media attention. The Court wants to make sure that this case is decided solely on the evidence presented in the courtroom and not based on influences outside the courtroom. The Court will be advising you daily that you must avoid reading about the Case on the Internet, in newspapers or listening to any radio or television reports about the case. The Court will further advise you not to discuss the case with family or friends during the trial or with your fellow jurors until it is time to deliberate. Would these restrictions pose any difficulty for you?

Yes _____ No _____

If yes, please explain: _____

68. The charges in this case involve allegations of, among other things, sex trafficking, forced labor, child pornography and child exploitation. Is there anything about the nature of these allegations that would make it difficult for you to be fair and impartial?

Yes _____ No _____

If yes, please explain: _____

69. Do you have any bias, sympathy, or prejudice with reference to the United States government that would make it difficult for you to render a fair and impartial judgment based solely on the evidence presented at trial?

Yes _____ No _____

If yes, please explain: _____

70. (a) Do you have any religious, philosophical, moral or other belief that might make you unable to render a "guilty" verdict?

JUROR NO. _____

Yes _____ No _____

If yes, please explain: _____

(b) Do you have any religious, philosophical, moral or other belief that might make you unable to render a “not guilty” verdict?

Yes _____ No _____

If yes, please explain: _____

71. You may hear testimony from or about the people listed on Attachment A during the trial. Please turn to Attachment A at the end of this packet and circle the names of any person that you know or have any connection with.

**PART IV: LEGAL PRINCIPLES
(Questions 72 through 87)**

Part IV explains some of the fundamental legal principles on which the Court will give instructions during the trial. If you believe you cannot follow these principles, you are duty bound to let the Court know now.

72. (a) Every defendant is presumed innocent and cannot be convicted unless the jury, unanimously and based solely on the evidence in the case, decides that his guilt has been proven beyond a reasonable doubt. The burden of proving guilt rests entirely with the government. It never shifts to the defendant at any time. The defendant has no burden of proof at all.

Would you have any difficulty following these rules?

Yes _____ No _____

If yes, please explain: _____

JUROR NO. _____

(b) Will you accept and apply this rule of law?

Yes _____ No _____

(c) Under the law, a defendant need not testify. If a defendant does not testify, the jury may not consider that fact in any way in reaching a decision as to whether a defendant is guilty or not guilty. Would you have any difficulty following this rule of law?

Yes _____ No _____

If yes, please explain: _____

73. An indictment itself is not evidence. It merely describes the charges made against the defendants. It is an accusation. It may not be considered by you as any evidence of the defendants' guilt. Are you able to follow this rule of law?

Yes _____ No _____

If yes, please explain: _____

74. Under the law, you must consider each defendant and each alleged crime separately. You must find a defendant not guilty of the alleged crime you are considering, unless the evidence that has been presented in court proves him or her guilty of that crime beyond a reasonable doubt.

Would you have any difficulty following these rules?

Yes _____ No _____

If yes, please explain: _____

JUROR NO. _____

75. Should a defendant decide to testify, that does not shift the burden of proof to the defendant or diminish the obligation of the government to prove the defendant's guilt beyond a reasonable doubt. The government always carries this burden of proof in a criminal trial. Will you have any difficulty following this rule of law?

Yes _____ No _____

If yes, please explain: _____

76. Certain witnesses in this case may be law enforcement officers.

(a) Do you hold any beliefs or opinions that would prevent you from evaluating the testimony of a law enforcement officer fairly and impartially?

Yes _____ No _____

If yes, please explain: _____

(b) A law enforcement witness's testimony is not to be given any more or less credence than any other witness's testimony. Would you be able to follow the Court's instructions in this regard?

Yes _____ No _____

If no, please explain: _____

77. You may hear that law enforcement officers conducted surveillance and searched individuals and residences, during the investigation of this case. These investigative techniques are lawful. Do you have any feelings about the use of these techniques that might affect your ability to consider such evidence fairly?

Yes _____ No _____

If yes, please explain: _____

JUROR NO. _____

78. You may hear testimony from certain individuals that the government alleges are victims. A victim's testimony is not to be given any more or less credence than any other witness's testimony, just because that person is an alleged victim. Do you have any opinions or beliefs about alleged victims that would make it difficult for you to be fair and impartial in considering their testimony?

Yes _____ No _____

If yes, please explain: _____

79. Some government witnesses may testify that they participated in serious crimes themselves including forced labor and identity theft. These witnesses, who may be referred to during trial as "cooperating witnesses," may have pleaded guilty to crimes and may be testifying pursuant to agreements with the government in hopes that their own sentences will be reduced. Do you have any opinions or beliefs about cooperating witnesses who are seeking a reduced sentence that would make it difficult for you to be fair and impartial in considering their testimony?

Yes _____ No _____

If yes, please explain: _____

80. 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: _____

81. Under the law, the question of punishment, if any, should not enter your deliberations. Would you have any difficulty following this rule?

Yes _____ No _____

JUROR NO. _____

If yes, please explain: _____

82. 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: _____

83. Is there anything about the nature of the charges in this case or the people accused that would affect your ability to fairly evaluate the evidence to determine whether or not the prosecution has proven the guilt of the defendants beyond a reasonable doubt?

Yes _____ No _____

If yes, please explain: _____

84. Is there any reason you could not be completely fair to the defendants in this case?

Yes _____ No _____

If yes, please explain: _____

85. Is there any reason you could not be completely fair in evaluating the U.S. government's case?

Yes _____ No _____

If yes, please explain: _____

JUROR NO. _____

87. Is there any matter not covered by this questionnaire that you think is important to bring to the attention of the Court?

Yes _____ No _____

If yes, please explain: _____

WHEN YOU HAVE COMPLETED THE QUESTIONNAIRE AND REVIEWED ATTACHMENT A, PLEASE RETURN TO THE SECOND PAGE OF THIS QUESTIONNAIRE TO COMPLETE AND SIGN THE DECLARATION.

DRAFT

JUROR NO. _____

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ATTACHMENT A:
Names of People Who Might Testify or Who May Be Discussed During Trial

Please circle the name of any person listed below that you know or have any connection with.

[FILL IN LATER]

DRAFT