

UNITED STATES v. DZHOKHAR TSARNAEV
Crim. No. 13-10200-GAO

Juror Name

Juror Number

UNITED STATES v. DZHOKHAR TSARNAEV
Crim. No. 13-10200-GAO

JUROR QUESTIONNAIRE
PRELIMINARY INSTRUCTIONS

As Judge O'Toole explained to you, the purpose of this questionnaire is to help the judge and the lawyers pick a fair and impartial jury. It is not a test. There are no "right" or "wrong" answers. You do not need to know anything about the law to fill it out. You just need to answer the questions completely and honestly.

Your questionnaire answers will be kept confidential. They will be seen only by the judge, the parties, and their assistants. Please answer the questions as candidly as possible. For this process to work, it is important that you are completely truthful about your actual views and opinions. Everyone involved in this process is relying on what you say. We are genuinely interested in what *you* think. It will not help if you give answers that are "politically correct" or reflect what you think we want to hear or what a "good" juror should say. You took an oath to give truthful answers, and we are relying on you to honor that oath and be honest.

We understand that no one's memory is perfect and that people filling out questionnaires sometimes make mistakes. Don't worry about that. Just do your honest best. Please do not leave any question unanswered. If you are not sure whether a question applies to you, please assume it does and answer it. If you do not understand any question or do not know the answer (or if you are just unsure), please write "I do not understand," or "I do not know," or "I'm not sure." If you need assistance in completing the questionnaire, please ask only the court staff for help. If you need additional space for your responses, please use the pages provided at the end of the questionnaire.

Starting now, it is important that your only information about this case come from the Court and the parties -- not from family, friends, news media, or social media. So please remember and follow these rules:

- Do not discuss this case with anyone. That includes family members, friends, and other potential jurors.
- If anyone attempts to talk to you about this case, immediately notify the judge or a member of the courtroom staff.
- Do not read, watch or listen to any media accounts or conversations about this case. Do not go on the internet and look up any news stories or websites that may have information about this case. Do not go to any of the physical locations that you believe may be involved in this case, if at all possible. If you are exposed accidentally to information or discussion about this case, please inform the judge when you appear for voir dire (individual questioning).

1. Name: _____
2. Date of birth _____
3. Gender: ☐ Male ☐ Female
4. Race: (This information will not affect your selection for jury service.) _____
5. What city and county to do you live in? _____
6. How long have you lived there? _____
7. In what city, state and country were you born and raised?

Born: _____ Raised: _____

If you were born in another country, when did you move to the United States, and when did you obtain U.S. citizenship?

Moved: _____ Citizenship: _____

8. Have you ever lived in another country? ☐ Yes ☐ No

What Country?

For how long?

9. Do you have any difficulty understanding English? ☐ Yes ☐ No

10. If you believe you have a physical or mental condition that would affect your ability to serve as a juror, including difficulty hearing, seeing, reading, or concentrating, please explain:

11. The trial of this case could take up to three or four months. Do you believe serving on the jury for that length of time would be such a severe medical, personal, family, or professional hardship that you should be excused? If yes, please explain.

12. If you take any medications that you think might affect your ability to serve as a juror, please describe them and their effects:

Medication

Example: Xanax

Side Effects

Makes me sleepy

<hr/>	<hr/>
<hr/>	<hr/>
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13. What is your current relationship status?

☐ Single

☐ Married

☐ Living with someone

14. Please identify by first name your current spouse or live-in partner (if any) and all former spouses and live-in partners (if any) and provide their highest level of education and occupation while you were together:

First name

Ex: Linda

Relationship to you

Ex-wife

Highest ed. level

BA in Physics

Occupation

Engineer

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15. Please describe your parents' and/or step-parents' occupations (write "none" or "deceased" if that applies):

Father: _____

Step-father: _____

Mother: _____

Step-mother: _____

16. Please identify all your children and step-children (including any who are deceased)

Name	M/F	Age	Occupation (if any)	Place of residence
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

17. Please identify all your siblings and step-siblings (including any who are deceased)

Name	M/F	Age	Occupation (if any)	Place of residence
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

18. Have any of your siblings tried to influence your direction in life or your major life decisions (*e.g.*, choice of job, spouse, religion, congregation)? If so, please explain:

19. Have you tried to influence any of your siblings' direction in life or major life decisions (e.g., choice of job, spouse, religion, congregation)? If so, please explain:

20. Do you feel that any of your siblings has had a major positive or negative influence on you? If so, please explain:

21. If you or any close family member has (or ever had) a mental health or addiction problem that you know about, please describe it:

22. How did the members of your family treat each other when you were growing up?

23. Please list all schools you attended after high school, what you studied, and any certificates or degrees that you received:

School	Location	Area of study	Degree/ certificate
<hr/>	<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>	<hr/>

24. If you have studied law, medicine, psychiatry, psychology, counseling, sociology, social work, or religion, please describe your training:

25. If you have studied ballistics, explosives, arson, criminology, terrorism, computer science, crime scene investigation, or law enforcement, please describe your training:

26. Do you plan to attend school in the future? If so, what do you intend to study:

27. How interested are you in the field of psychology?

☐ Very interested ☐ Somewhat interested ☐ Not at all interested

28. List any jobs you have held for the past ten years, in reverse chronological order, noting periods of unemployment, retirement, disability, or homemaking. Check "Sup." if you supervised others. If you can't remember exact names, titles, or time periods, please estimate.

Employer	Title/Position	Yrs.	Sup.
_____	_____	_____ to: 2014	<input type="checkbox"/>
_____	_____	_____ to: _____	<input type="checkbox"/>
_____	_____	_____ to: _____	<input type="checkbox"/>
_____	_____	_____ to: _____	<input type="checkbox"/>
_____	_____	_____ to: _____	<input type="checkbox"/>
_____	_____	_____ to: _____	<input type="checkbox"/>
_____	_____	_____ to: _____	<input type="checkbox"/>

29. If you are currently employed, please describe your job responsibilities:

30. If you have ever been a published or unpublished author, please describe the things you have written and when you wrote them:

31. If you blog or post messages or opinions on web sites, please describe the web sites, the types of things you blog or post, and how often you do it:

32. If you use social media (Facebook, Instagram, Twitter, etc.), please list all of the social media you use and how frequently you use each one:

33. Please list any TV shows you watch regularly:

34. If you, a family member, or close friend ever served in the military (including Reserves, National Guard, or ROTC), please describe the nature and length of that service:

35. If one or more of the people you listed ever saw combat (that you know about), please explain:

36. Have you, a family member, or close friend, ever worked for, applied for a job at, or volunteered at, a prosecutor's office, public defender's office, criminal defense attorney's office, or any other lawyer or law office? If so, please explain (including employer and dates of work):

Example: Wife

State prosecutor

2007-present

37. Have you, a family member, or close friend, ever, to your knowledge, worked for, applied for a job at, or volunteered at a law enforcement agency (*e.g.*, FBI, DEA, ATF, ICE, IRS, U.S. Marshal Service, police, sheriff, or correctional department)? If so, please explain (including agency and dates of affiliation):

Example: Son *FBI Agent* *2007-present*

38. Have you, a family member, or close friend, ever, to your knowledge, worked for, applied for a job at, or volunteered at, any federal, state, or local department of corrections, prison, jail, board of prisons, pardons or parole board or probation agency, youth authority, or correctional or detention facility? If so, please explain:

Example: Self *Parole officer* *2007-present*

39. Are you able to treat a law enforcement officer's testimony the same way as any other witness's, and not give it more or less weight just because the witness is a law enforcement officer? ☐ Yes ☐ No

40. Have you ever done paid or volunteer work for the benefit of people accused of crimes or people who served time in prison? If so, please explain:

41. Have you ever attended a meeting, sponsored an effort, or supported any group that deals with victims' rights, or with the reform of any laws? If yes please explain.

42. If you, a family member, or a close friend have ever (to the best of your knowledge) committed a crime and/or been arrested, accused of a crime, charged with a crime, or prosecuted for a crime, other than a minor traffic violation, please explain (include the person's relationship to you, the charge, the approximate date, the location, and the outcome):

Example: Close friend, Drug Possession, 1982 New Mexico, Pleaded guilty

43. If you, a family member, or close friend, have ever (to the best of your knowledge) been the victim of a crime, please explain (including the person's relationship to you, when and where the crime occurred, and the outcome of any prosecution):

Example: Sister victim of assault 1999 Chicago Defendant convicted

44. If you (to the best of your recollection) have ever had to appear in court, or in any court proceeding (for example, court trial, court or administrative hearing, civil or criminal deposition, etc.) OTHER THAN as a defendant (e.g., as a witness), please explain:

45. If you, a family member, or a close friend (to the best of your knowledge) have ever been treated unfairly by a law enforcement officer or by the criminal justice system, please explain:

46. If you have strongly positive or negative views about prosecutors, please explain:

47. If you have strongly positive or negative views about defense attorneys, please explain:

48. If you have strongly positive or negative views about law enforcement officers, please explain:

49. Have you ever served on a jury before? If yes, please describe (to the best of your recollection), for each case on which you served:

Civil or Criminal?

Charges/ Allegations

When

Where

Did the Jury Reach a verdict?

Were you the foreperson on any of these juries? If yes, which case(s)?

Is there anything about the experience that would make you want to serve, or not serve, on a jury again? Please explain:

50. Have you ever served on a grand jury? If yes, when and where?

51. In the past 10 years, what court cases have you followed with interest? What interested you about these cases?

52. In the past ten years, to the best of your recollection, what organizations have you, your spouse, or partner (or former spouse or partner) belonged to, contributed to, volunteered at, or supported (*e.g.*, church, synagogue, mosque, ACLU, NPR, NRA, PTA, Junior League, Rotary, etc.)? Please describe the nature of each person's involvement:

53. Name any of the above groups you still belong to, support, or volunteer at:

54. Describe any leadership position you have held in any of these organizations:

55. Politically, do you consider yourself to be:

- ☐ Very Liberal ☐ Liberal ☐ Moderate ☐ Conservative ☐ Very Conservative
☐ Independent ☐ Other _____ ☐ Not Applicable

56. If, to the best of your knowledge, you, or anyone close to you, has participated in a group that takes positions on political or social issues (*e.g.*, civil rights, prisoners' rights, crime control, the environment, death penalty), please describe:

Example: Spouse

Example: The Sierra Club

_____	_____
_____	_____
_____	_____
_____	_____

57. What religion were you born into (if any)?

58. What is your current religion (if any)?

59. How religious do you consider yourself?

60. How often do you attend your place of worship?

61. How familiar are you with the teachings of Islam (*i.e.* the Muslim religion)?

☐ Very familiar ☐ Somewhat familiar ☐ Not at all familiar

62. Do you have any experience with people who are Muslim or practice the Muslim religion? If yes, please explain.

63. What are your thoughts or opinions about Muslims or about Islam?

64. Do you believe the United States government acts unfairly towards Muslims in this country or in other parts of the world? ☐ Yes ☐ No If yes, please explain:

65. Do you believe the “war on terror” unfairly targets Muslims? ☐ Yes ☐ No

66. Do you believe the “war on terror” is overblown or exaggerated? ☐ Yes ☐ No

67. Do you have strong feelings about our laws or government policies concerning legal immigration? ☐ Yes ☐ No If yes, please explain:

68. Do you believe that our government allows too many Muslims, or too many people from Muslim countries, to immigrate legally to the United States? ☐ Yes ☐ No
If yes, please explain:

69. If you know anyone who, to the best of your knowledge, is Chechen, Avar, Dagestani or of Chechen, Avar, or Dagestani descent, please describe who it is you know and how you know them:

70. Please describe your feelings (if any) about Russia, Chechnya, Dagestan, or about people from those places

71. Do you believe most teenagers are easily influenced by others?

☐ Yes ☐ No

72. Do you believe most teenagers are easily influenced by older siblings?

☐ Yes ☐ No

73. What is your primary source of news (*e.g.* newspapers, internet, TV, radio, word-of-mouth, etc.)? Please list all that apply.

74. What newspapers do you read and how often do you read them? Please include on-line editions of newspapers in your answer:

75. What news or talk radio programs do you listen to on the radio or over the internet and how often?

76. What national or local news programs do you watch on TV or over the internet and how often?

77. To the best of your recollection, have you ever called into a talk show, written a letter to the editor, or posted a comment on a web site to express your opinion about ANY issue? If yes, what was the issue?

78. How would you describe the amount of media coverage you have seen about this case:

- ☐ A lot (read many articles or watched television accounts)
- ☐ A moderate amount (just basic coverage in the news)
- ☐ A little (basically just heard about it)
- ☐ None (have not heard of case before today)

79. What did you know about the facts of this case before you came to court today (if anything)?

80. What did you think or feel when you received your jury summons for this case?

81. To the best of your recollection, what kinds of things did you say to others, or did others say to you, regarding your possible jury service in this case?

82. If you did any on-line research about this case, or about anything relating to it, after receiving your jury summons, please describe it:

83. As a result of what you have seen or read in the news media, or what you have learned or already know about the case from any source, have you formed an opinion:

- (a) that Dzhokhar Tsarnaev is guilty? ☐ Yes ☐ No
- (b) that Dzhokhar Tsarnaev is not guilty? ☐ Yes ☐ No
- (c) that Dzhokhar Tsarnaev should receive the death penalty? ☐ Yes ☐ No
- (d) that Dzhokhar Tsarnaev should not receive the death penalty? ☐ Yes ☐ No

If you answered “yes” to any of these questions, can you set aside your opinion and base your decision about guilt and punishment solely on the evidence that will be presented to you in court?

☐ Yes ☐ No

84. If you answered “yes” to any of the above, have you expressed or stated your opinion to anyone else? ☐ Yes ☐ No. If “yes,” please explain.

85. If you have commented on this case in a letter to the editor, an on-line comment or post, or on a radio talk show, please describe:

86. If you or, to the best of your knowledge, a family member, or close friend witnessed the Boston Marathon explosions or the response to them IN PERSON, please describe who was there and what he or she saw:

87. If you or, to the best of your knowledge, a family member, or close friend were personally affected by the Boston Marathon bombings or any of the crimes charged in this case (including being asked to “shelter in place” on April 19, 2013), please explain:

88. If you or, to the best of your knowledge, anyone in your family or household has (1) taken part in any of the activities, events, or fundraisers that have been held in support of the victims of the Boston Marathon Bombing; (2) contributed to the One Fund; or (3) bought or worn any merchandise, clothing, or accessories that have logos such as “Boston Strong” that relate to the Boston Marathon Bombing, please explain:

The following is a summary of the facts of this case. Please read it carefully and answer the questions that follow.

On Monday, April 15, 2013, two bombs exploded on Boylston Street in Boston near the Boston Marathon finish line. The explosions killed Krystle Marie Campbell (29), Lingzi Lu (23), and Martin Richard (8), and injured hundreds of others. Four days later, on Thursday, April 18, 2013, at approximately 10:30 p.m., MIT Police Officer Sean Collier (26) was shot to death in his police car near the corner of Main Street and Vassar Street in Cambridge. Approximately 90 minutes later, a man named Dun Meng called the police from a gas station on Memorial Drive in Cambridge; he said that two men had carjacked him in Boston, kidnapped and robbed him, and still had his car. Approximately 20 minutes after that, two men in Watertown had a confrontation with police near the intersection of Laurel Street and Dexter Avenue in which shots were fired and bombs were thrown. One of the men, Tamerlan Tsarnaev, was injured at the scene and died shortly thereafter. The other, Dzhokhar Tsarnaev, was captured some 15 hours later after he was found hiding in a boat in Watertown.

Dzhokhar Tsarnaev has been charged with various crimes arising out of these events. Mr. Tsarnaev was raised in Cambridge and attended Rindge and Latin High School. At the time he is alleged to have committed the crimes, he was a 19 year-old student at UMass-Dartmouth.

89. To the best of your knowledge, do you or anyone close to you have any PERSONAL connection to any of the individuals or places mentioned in the case summary you just read? If yes, please explain:

90. Do you believe you know any of the following people, their colleagues, staff members, or family members? ☐ Yes ☐ No

A. Presiding judge: The Honorable George O'Toole

B. Defense lawyers: Judy Clarke, David I. Bruck, Miriam Conrad, Timothy Watkins, and William Fick;

C. Prosecutors: William D. Weinreb, Alope S. Chakravarty, Nadine Pellegrini, and Steven Mellin;

D. Defendant: Dzhokhar Tsarnaev

If you answered yes, please identify whom you know and how you know them:

91. A list of people who may testify at this trial is attached to this questionnaire. Please read every name on the list. If you PERSONALLY know any of them or their immediate family members, provide details below:

92. The evidence in this case may include graphic photographs and videos showing very severe injuries suffered by victims of the bombings. Do you think that seeing such graphic pictures would affect your ability to serve as a juror? _____

Mr. Tsarnaev is charged with seventeen crimes that carry a maximum sentence of death. If the jury finds Mr. Tsarnaev guilty of one or more of those crimes, the jury will then decide whether to sentence Mr. Tsarnaev to death or to a sentence of life imprisonment without the possibility of parole.

93. What are your views on the death penalty?

94. Please circle one number that indicates your opinion about the death penalty. A “1” reflects a belief that the death penalty should never be imposed; a “10” reflects a belief that the death penalty should be imposed whenever the defendant has been convicted of intentional murder.

Strongly Oppose

Strongly Favor

1 2 3 4 5 6 7 8 9 10

95. Which of the following best describes your feelings about the death penalty in a case involving someone who is proven guilty of murder?

(a) I am opposed to the death penalty and will never vote to impose it in any case no matter what the facts.

(b) I am opposed to the death penalty and would have a difficult time voting to impose it even if the facts supported it.

(c) I am opposed to the death penalty but I could vote to impose it if I believed that the facts and the law in a particular case called for it.

(d) I am not for or against the death penalty. I could vote to impose it, or I could vote to impose a sentence of life imprisonment without the possibility of release, whichever I believed was called for by the facts and the law in the case.

(e) I am in favor of the death penalty but I could vote for a sentence of life imprisonment without the possibility of release if I believed that sentence was called for by the facts and the law in the case.

(f) I am strongly in favor of the death penalty and I would have a difficult time voting for life imprisonment without the possibility of release regardless of the facts.

(g) I am strongly in favor of the death penalty and would vote for it in every case in which the person charged is eligible for a death sentence.

(h) None of the statements above correctly describes my feelings about the death penalty. If you selected (h) as your answer, please explain:

96. If your views about the death penalty have changed over the past 10 years (i.e. now more in favor or less in favor), please explain how and why your views have changed:

97. What, in your personal opinion, are the best arguments **for** the death penalty?

98. What, in your personal opinion, are the best arguments **against** the death penalty?

99. What does your religion, philosophy or spiritual training teach about the death penalty?

100. Do you believe the death penalty is sought in the United States:

☐ Too often ☐ Too seldom ☐ About right ☐ No opinion

101. Which of the following best describes your opinion (please check only one)?

Life imprisonment without the possibility of release is:

- ☐ Less severe than the death penalty
- ☐ About the same as the death penalty
- ☐ More severe than the death penalty
- ☐ No opinion

Please explain your answer:

102. Do you believe that anyone close to you would be critical of you or disappointed in you, if you voted for the death penalty in this case? If you voted for life imprisonment without parole? If your answer is "yes" or "I'm not sure" to either question, please explain:

103. If you were on the jury and you decided that the death penalty was the appropriate punishment for Mr. Tsarnaev, could you vote for the death penalty?

- ☐ Yes
- ☐ I am not sure
- ☐ No

104. If you were on the jury and you decided that life imprisonment without possibility of release was the appropriate punishment for Mr. Tsarnaev, could you vote for life imprisonment without possibility of release?

- ☐ Yes
- ☐ I am not sure
- ☐ No

105. If there is anything else (political, ethical, moral, religious, philosophical, medical or personal) that might affect your ability to serve as a juror in this case, please explain:

106. Do you understand any of the following foreign languages: Russian; Chechen; Arabic?

107. Is there anything else that you would like to tell us, or that you feel we should know about you?

I declare under the penalty of perjury that all my answers to the questions on this questionnaire are true and correct to the best of my knowledge and belief.

(Your Signature)

Date

PLEASE USE THE FOLLOWING PAGES TO CONTINUE ANY OF YOUR ANSWERS TO THE ABOVE QUESTIONS. BE SURE TO INDICATE THE NUMBER OF THE QUESTION YOU ARE ANSWERING:

ADDITIONAL COMMENT PAGES IF NECESSARY

(Please identify the question number for each answer)

[illegible]

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.