

STATE OF MINNESOTA
COUNTY OF SCOTT

DISTRICT COURT
FIRST JUDICIAL DISTRICT

State of Minnesota,
-vs-

Plaintiff,

JURY QUESTIONNAIRE

Abraham Isaac Bell,

Defendant.

District Court File No. 70-CR-19-20254

TO PROSPECTIVE JURORS

The use of this Questionnaire is to assist lawyers and the court in the selection of a fair, impartial and neutral jury.

Your answers to the questions contained in the Questionnaire, like your answers to questions in open court during jury selection proceedings, are part of the public record in this case.

**DO NOT DISCUSS YOUR ANSWERS WITH ANY OF THE OTHER PROSPECTIVE
JURORS.**

If you object to answering any particular questions in writing because the answers will be sensitive or embarrassing to you, you may request an opportunity to address the court to ask that such answers be given orally and not disclosed to the public.

Do you swear or affirm that you will truthfully answer all questions about your qualifications to serve as a juror?

If so, please write "I will" _____

Name (First, Middle, Last) _____

General Background

1. Date of Birth: _____
2. Gender: _____ Male _____ Female _____ Prefer not to say
3. What city / town do you live in?

4. How long have you lived in Scott County? _____
5. How long have you lived at your current address? _____
6. Do you _____ Own _____ Rent
7. Where did you grow up? (city, county, state) _____
8. What is your marital status? (please check appropriate box)

_____ Married	How many years married? _____
_____ Divorced	How long married? _____
_____ Separated	How long? _____
_____ Widowed	How long married? _____
_____ Single (never married)	
_____ Living with significant other	How long? _____
9. If you have children, stepchildren, or are the guardian of any children, please state:
Sex Age Do they live with you? Education* Occupation* Marital Status*

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

10. Does anyone else live in your home, and if so what is their relationship to you, their age, and occupation?

Employment

11. What is your present job or occupation? _____

- | | |
|------------------|-----------------|
| _____ Full Time | _____ Part Time |
| _____ Unemployed | _____ Disabled |
| _____ Retired | _____ Homemaker |
| _____ Student | |

12. If employed, how long have you been so employed?

13. If you are retired, disabled, or recently changed employment, what was your last job or occupation? _____

And when _____

14. Do/did you supervise others in your job? _____ Yes _____ No

15. Have you ever owned your own business? _____ Yes _____ No

IF YES, please describe the nature of and name of the business:

16. If married or living with another person, what is your spouse or significant other's job or occupation? _____
17. If he or she is retired or unemployed, what was his or her occupation before retiring or being unemployed? _____

Education

18. List schools attended, dates attended, major areas of study and degrees:

High School: _____

College/Technical School: _____

Graduate School: _____

19. If married or living with another person, what is your spouse or significant other's educational background? _____
20. 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.)

_____ Corrections/Jail/Prison

_____ Victims of Crimes

_____ Counseling

_____ Firearms/Guns

_____ Forensic Sciences

_____ Security

_____ Genetics/DNA

_____ Investigations

_____ Justice System/Courts

_____ TV/Radio

_____ Laboratory

_____ Law

_____ Law Enforcement

_____ Local/State/Federal Government

_____ Medicine/Nursing

_____ Mental Health

_____ Pathology

_____ Police Procedures

_____ Psychology

_____ Science or Biology

IF YES, please explain:

Personal

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

22. 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:

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

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

_____ Radio

_____ Magazines

_____ Newspapers

_____ Internet

_____ Television

_____ Word of Mouth

_____ Other (please identify) _____

25. 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

26. 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

27. 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

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

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

29. Which newspapers or magazines do you regularly read?

30. What television shows, if any, do you watch on a regular basis?

Military

31. Were you ever in the military, including ROTC or National Guard? _____ Yes _____ No

IF YES, please answer the following:

- a. What branch? _____
- b. Dates of service? _____
- c. Rank or rating? _____
- d. Where were you stationed? _____
- e. Character of discharge (honorable, general, etc.)? _____
- f. Reason for discharge? _____
- g. Were you ever involved in combat? (if yes, when and where)

32. 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:

Law Enforcement and Judicial Contacts

33. Under our system of justice, a defendant is presumed innocent until proven guilty beyond a reasonable doubt. Do you have any disagreements with this principle of law?

_____ Yes _____ No

34. In order to find a defendant guilty, the state must prove his or her guilt beyond a reasonable doubt. If the state does not meet this burden, the defendant must be found not guilty. If the state does meet this burden, the defendant must be found guilty. Do you have any disagreements with these principles of law?

_____ Yes _____ No

35. The jury in this case will be instructed to: (1) Not read, watch, or listen to any news accounts about this trial until it is over; (2) Not conduct any independent research as to the law or facts of this case, including not researching the Defendant now or during the case, and; (3) Not talk to anyone *about the case*, not even to one another, until the jury retires to deliberate upon its verdict. Would you find it difficult to follow these instructions for any reasons?

_____ Yes _____ No

36. Have you, a family member, or a close friend, ever been the victim of a crime, whether or not it was reported to law enforcement?

_____ Yes, I have _____ Yes, family or friend _____ No

IF YES, what was the crime and what was the outcome?

37. Have you, a family member, or a close friend, ever been a witness to a crime, filed a report with a law enforcement agency, or had contact with a prosecutor's office?

_____ Yes, I have _____ Yes, family or friend _____ No

IF YES, please explain:

38. Have you, a family member, or anyone close to you, ever been a suspect in, arrested for, or charged with, a criminal offense (not including minor parking or speeding type traffic offenses)? _____ Yes _____ No

IF YES, please explain:

39. If you answered **yes** to questions 36, 37, or 38, was there anything about your experiences with law enforcement, attorneys, or the court system that you thought was unfair, unpleasant, or not handled appropriately? _____ Yes _____ No

IF YES, please explain:

40. Have you ever had any particularly good or bad experiences with law enforcement officers? _____ Yes _____ No

IF YES, please explain:

41. Would you tend to believe the testimony of a police officer either more or less than the testimony of any other witness? _____ Yes _____ No

IF YES, please explain:

42. Have you ever testified in court as a witness? _____ Yes _____ No

IF YES, please explain:

43. Have you ever previously served as a juror? _____ Yes _____ No

When (year) _____ Where (State, County) _____

IF YES, was it a: _____ Criminal Case _____ Civil Case

IF YES, without disclosing what the verdict was, did you reach a verdict?

_____ Yes _____ No

44. Do you have any family members or close friends who are, or have been, employed with a law enforcement agency? _____ Yes _____ No

IF YES, please explain:

45. Are you presently involved with the County Attorney's office? Have you been so involved in the past? Do any of you have an ongoing relationship with either office?

_____ Yes _____ No

IF YES, please explain:

46. Do you have any moral, philosophical, or religious beliefs that would interfere with your ability to sit as a fair and impartial juror? _____ Yes _____ No

IF YES, please explain:

47. Do you have any physical problem that would prevent or make it difficult to serve as a juror? _____ Yes _____ No

IF YES, please explain:

48. Do you have any personal reasons that would interfere with your ability to be a fair and impartial juror? _____ Yes _____ No

IF YES, please explain:

49. Do you have any family responsibilities (such as full-time care of young children or an elderly person) that would interfere with your service as a juror? _____ Yes _____ No

IF YES, please explain:

50. Is there anything else that the court or the parties should know about you that may impact your ability to be a fair and impartial juror in this case? _____ Yes _____ No

IF YES, please explain:

51. This trial may last through Friday, June 26, 2020. Jury service is typically performed during business hours, approximately 8 a.m. to 5 p.m., unless a jury themselves decides to extend their deliberations into the evening hours. Is there a reason (professional, personal, or otherwise) that would impede your ability to sit as a juror in this case?

_____ Yes _____ No

IF YES, please explain:

COVID 19 Questions

The main symptoms listed by the Center for Disease Control and Prevention (CDC) are :

- Cough
- Shortness of breath or difficulty breathing
- Fever
- Chills
- Muscle pain
- Sore throat
- New loss of taste or smell

Have you exhibited one or more of these symptoms in the last 2-14 days?

_____ Yes _____ No

Have you or anyone in your household tested positive for COVID 19 in the last 21 days?

_____ Yes _____ No

Are you or anyone in your household symptomatic? _____ Yes _____ No

Have you or anyone in your household had contact with anyone who has tested positive or is symptomatic? _____ Yes _____ No

If so, how long since the contact? _____

Does your employment or anyone in your household's employment place you at a high risk (e.g. first responder, nurse, essential worker, etc.)? _____ Yes _____ No

Are you concerned about having contact with other jurors, court personnel, staff, etc., due to COVID 19? If YES, please explain:

Witness names

1. The following is a list of names of individuals who may potentially be called to testify as witnesses in this proceeding or whose names could be mentioned during the proceedings. Carefully review this list. In the event that you think you recognize or know any prospective witness, please place an "X" next to that name:

_____ Sergeant Daniel Olson

_____ Detective Joshua Rozga

_____ Officer Garrett Kelm

_____ Crime Analyst Laura Wiger

_____ Officer Cody Steinhaus

_____ Forensics Zubin Medora

_____ Officer Jonathan Cassman

_____ Christine Nelson

_____ Detective Conrad J Adelmann

_____ Jonahs Novak

____ Emanuel Matthew Tabone

____ Dennis John Bartholow

____ Geoffrey Lock

____ Leonard Winborn

____ Jamar Antonio Pankey

____ Lakia Shante Winborn

Please explain how you think you know the witness:

52. The following attorneys may be involved in the trial. Place a check mark next to the name of any attorney that you or any member of your family has had contact with:

____ Wes Abrahamson

____ David Dierenfield

Please explain how you think you know the attorney:

Please read the following statement carefully and sign below if you are in agreement with it:

I declare under penalty of perjury that everything that I have stated in this document is true and correct, that I have given complete and honest answers to all of the questions above, and I have checked the names of all persons on the above list with whom I am acquainted. Minn. Stat. § 358.116.

Signature