

JUROR QUESTIONNAIRE
ABILITY TO SERVE

JUROR # _____

The testimony is expected to begin on January 12, 2014. The Court and parties expect that this trial will last five to six months. Court sessions will last from approximately 9-11 a.m. and 1:15-3:15 p.m. Monday through Thursday for testimony. While the answers to these questions are not confidential, you may sign at the end with your juror number which you will receive from court staff when you turn in the form. Whether you sign by name or number, your answers are under oath.

1. Jurors who are not excused will be questioned individually for half a day in November and December. There will be no other obligation to appear in November and December. Are there any days in November or December where you believe that you are unavailable for that half day? If so, please indicate dates and explain:

2. Do you wish to apply to the Court to be excused on the grounds that jury service in this case would be a **serious hardship** to you? ☐YES ☐NO If yes, please explain:

3. Do you have any personal, family, or professional obligations that you feel would seriously interfere with your ability to focus and concentrate as a juror in this case? ☐YES ☐NO If yes, please explain:

4. Does your employer pay you for time missed as a result of jury service? ☐YES ☐NO ☐UNSURE*

**If you are unsure, please find out before you return to court for jury selection questioning.*

5. If you are employed, are you a member of a labor union? ☐YES ☐NO

6. Do you have any condition, disability, or need that will require any special consideration or accommodation while you are in court? ☐YES ☐NO If yes, please explain:

7. Do you have hearing difficulties not corrected by a hearing aid? ☐YES ☐NO
8. Do you have trouble seeing even with glasses? ☐YES ☐NO
9. a. Do you have any problems with memory or concentration? ☐YES ☐NO
- b. Are you taking any medications that affect your memory or concentration? ☐YES ☐NO

GENERAL INFORMATION

10. Age:_____ 10. ☐ Male ☐ Female 11. Race/Ethnicity:_____

12. Please check all that apply:

☐Employed FT ☐Employed PT ☐Homemaker ☐Unemployed ☐Disabled ☐Student

13. Employer:_____

14. Briefly describe your job title and duties:

15. Do you now or have you ever held a supervisory position? ☐YES ☐NO

If yes, please describe type of work, when, and number of people you supervised:

16. What types of jobs have you held in the past?

17. What special interests or training do you have either as a result of formal education or self-education?

18. What is the highest level of education you have completed, and what degrees/diplomas have you earned?

19. What is your current relationship status? Are you:

Single and . . .

- ☐ Never married
☐ Living with someone
☐ Divorced

Married and . . .

- ☐ Never divorced
☐ Previously divorced
☐ Currently separated

Widowed and . . .

- ☐ Remarried
☐ Now single
☐ Living with someone

20. If married, or living with someone, please describe your spouse/partner's occupation, place of employment and highest level of education:

21. Please indicate how many children you have, their ages, genders, and occupations (if child is employed):

22. If you have ever been in any branch of the armed forces of the United States (including the military reserves, National Guard, or ROTC) please answer the following:

a) List branch of service, approximate years of service, highest rank:

b) Did you ever participate in a court martial? ☐YES ☐NO If yes, please describe your role and charges:

c) Did you serve in active combat duty? ☐YES ☐NO If yes, which conflict, war, combat zone?

d) Did you ever serve as a military police officer? ☐YES ☐NO If yes, please describe, including where you served, your position, and your duties:

KNOWLEDGE AND OPINIONS ABOUT THE CASE

The defendant in this case, Christopher Monfort, is charged in Count I with Arson in the First Degree, in Count II with Attempted Murder in the First Degree, in Count III with Attempted Murder in the First Degree, in Count IV with Aggravated Murder in the First Degree, and in Count V with Attempted Murder in the First Degree. It is alleged in Count I that the defendant, on October 22, 2009, set a fire at a City of Seattle vehicle maintenance yard on Charles Street and detonated explosive devices there. It is alleged in Count II, that on October 22, 2009, the defendant attempted to cause the death of individuals at the City of Seattle vehicle maintenance yard on Charles Street, by detonating explosive devices there. It is alleged in Counts III and IV that on or about October 31, 2009, the defendant attempted to cause the death of Seattle Police Officer Britt Sweeney and caused the death of Seattle Police Officer Timothy Brenton, as they sat in their patrol car near the intersection of 29th Ave and East Yesler Way in Seattle, Washington. It is alleged in Count V that on or about November 6, 2009, the defendant attempted to cause the death of Seattle Police Sergeant Gary Nelson in the parking lot of the Terrace Apartments in Tukwila, Washington. Mr. Monfort has entered a plea of not guilty and not guilty by reason of insanity.

23. Please describe in detail everything you have read, seen or heard about this case, the crime, the defendant, the victims, or any other people involved? (Please use extra comment page at end of questionnaire if needed.)

24. Have you participated in or overheard any conversations among others, such as friends, family or coworkers concerning this case, the crime, the defendant, the victims, or any other people involved? ☐YES ☐NO

If yes, please explain, including who was involved in the conversation and what was discussed:

25. What opinions, if any, have you formed about this case, the crime, the defendant, the victims, or anyone else involved:

26. Some of the events at issue in this trial allegedly took place at the City of Seattle Fleets Charles Street complex, located at 805 S Charles St in Seattle, at the intersection of 29th St and Yesler Way in Seattle, and at the Terrace Apartments, located in Tukwila, Washington at 13725 56th Ave South.

Are you familiar with any of those locations? ☐YES ☐NO If yes, please describe:

27. Have you read, seen, or heard any news about the costs associated with this trial or other capital trials in the State of Washington? ☐YES ☐NO If yes, please describe what you have read, seen or heard and your related thoughts and opinions:

28. In February of 2014, Washington Governor Jay Inslee announced a moratorium on the death penalty which suspends executions for the balance of his term as governor. Nonetheless, under Washington law, the death penalty is still one of the possible penalties a jury may consider for someone convicted of aggravated murder in the first degree. Please describe your opinions about this issue, and whether anything about this moratorium could affect your ability to sit as a juror in this case:

29. Have you or anyone you know well such as a friend or family member ever worked with or had any personal or professional relationship with anyone affiliated with the King County Prosecuting Attorney's Office, or any other prosecuting attorney, such as a United States Attorney or City Attorney? ☐YES ☐NO If yes, please explain:

30. Have you or anyone you know well such as a friend or family member ever worked with or had any personal or professional relationship with anyone affiliated with the King County Public Defender Office, or any other criminal defense attorney? ☐YES ☐NO If yes, please explain:

31. Do you, *or* anyone close to you, know any person involved in any way with this case or incident, including the investigators, the lawyers, the victims, the defendant, or any other person directly or indirectly involved with the investigation, prosecution, defense, or people involved? ☐YES ☐NO If yes, please explain:

BELIEFS, VALUES, AND OPINIONS ABOUT PUNISHMENT

In this trial if the defendant is found guilty jurors will be asked to determine punishment for the defendant after consideration of aggravating factors and mitigating circumstances. This is a decision made by each juror individually. Ultimately, the jury can return one of these three final verdicts:

- a. unanimous verdict for life imprisonment without the possibility of parole
- b. unanimous verdict for the death penalty
- c. non-unanimous verdict – judge sentences defendant to life imprisonment without the possibility of parole

32. In general, what is your opinion of the death penalty as punishment for premeditated first degree murder?

Please circle one number on the 1 to 7 scale below that is closest to your opinion.

STRONGLY OPPOSED	1	2	3	4	5	6	7	STRONGLY IN FAVOR
to the death penalty								of the death penalty

33. Please describe in detail your beliefs and opinions about the **death penalty** as punishment for a person who is guilty of aggravated first degree murder for the premeditated and intentional killing of a police officer:

34. Why do you feel this way, or what are your reasons for your beliefs about the death penalty?

35. Life imprisonment without the possibility of release or parole is the presumptive penalty for a person who is convicted of aggravated first degree murder. Please describe in detail your beliefs and opinions about the penalty of life in prison without the possibility of release or parole, instead of the death penalty, as punishment for a person who is guilty of aggravated first degree murder for the premeditated and intentional killing of a police officer with no legal excuse or justification:

36. Why do you feel this way, or what are your reasons for your beliefs about the punishment of life in prison without the possibility of probation or parole?

37. In your opinion, should the death penalty be imposed: ☐ More Often ☐ About The Same ☐ Less Often
Please explain your thoughts:

38. a. Is the cost to taxpayers for housing an inmate in prison for life a concern to you? ☐YES ☐NO

Please explain why or why not:

b. Even if you heard no evidence about the cost of incarceration, would concerns about taxpayer dollars spent on a life sentence be something you would consider in favor of the death penalty? ☐YES ☐NO

c. Even if you heard no evidence about the cost, would concerns about taxpayer dollars spent in pursuit of the death penalty be something you would consider in choosing between a life without parole sentence and the death penalty ☐YES ☐NO

39. Do you believe in “an eye for an eye”? ☐YES ☐NO

Please explain why or why not:

40. a. In your opinion, what role, if any, do you believe extremely positive or negative childhood experiences, such as love and acceptance, abuse and neglect, or racial acceptance or discrimination experienced as a child, play in a person’s behavior and choices as an adult?

b. Do you consider information like that relevant when making a decision about punishment for an adult who is guilty of premeditated first degree murder with no legal excuse or justification?

☐YES ☐NO

Please explain why or why not:

41. In your opinion, what role, if any, should mercy play in a decision between the death penalty or life in prison without release for a person who is guilty of intentional capital murder?

42. What would you want to consider as a juror in deciding between the death penalty or the penalty of life in prison without the possibility of release or parole for a person who is convicted of the premeditated and intentional killing of a police officer?

43. Are your views for or against the death penalty influenced by your religious, spiritual, political, or philosophical beliefs? ☐YES ☐NO Please explain:

44. Would anything about your religious, spiritual, political, or philosophical beliefs make it difficult for you to sit in judgment of another person? ☐YES ☐NO Please explain why or why not:

45. If the judge gives you an instruction regarding the law you must follow which conflicts with a belief or opinion that you hold, how will you deal with that conflict?

COURTS AND THE LAW

46. Do you know any attorneys or judges? ☐YES ☐NO

If yes, please indicate who you know and how you know them:

47. Have you ever worked, trained, applied for work, or volunteered for any law enforcement agency, in corrections, or in a related field (such as police, FBI, TSA, probation officer, private security officer, etc.)?

☐YES ☐NO If yes, please indicate when, where, the job or nature of experience, and the approximate dates:

48. Has anyone you know well, such as a friend or family member, ever worked, trained, applied for work, or volunteered for any law enforcement agency, in corrections, or in a related field (such as police, FBI, TSA, probation officer, private security officer, etc.)? ☐YES ☐NO If yes, please indicate who, how you know them, where they work, the job or nature of experience, and the approximate dates:

49. Have you ever been employed, trained, applied for work, or volunteered in the legal field (for example a law office, courthouse, Prosecuting Attorney, Attorney General, US Attorney, defense attorney, Public Defender or paralegal)? ☐YES ☐NO If yes, please describe where, your experience, and the approximate dates:

50. Have you ever had any legal training or experience? ☐YES ☐NO If yes, please explain:

51. Have you ever visited a jail, prison, or other correctional facility for any reason? ☐YES ☐NO

If yes, please describe the circumstances and your reactions and impressions of the people and the place:

52. Please describe anything you have read, seen, or heard in recent months concerning the Seattle Police Department, and your related thoughts and opinions:

53. Please describe anything you have read, seen, or heard in recent months concerning the King County Sheriff's Office, and your related thoughts and opinions:

54. Do you have any strong opinions about law enforcement in general, or specific law enforcement agencies?

☐YES ☐NO If yes, please explain:

55. Have you ever been a victim of any violent crime? ☐YES ☐NO

If yes, please explain, including the nature of incident, and any police investigation or prosecution:

56. Has anyone you know well, such as a friend or family member, ever been a victim of any violent crime?

☐YES ☐NO If yes, explain who was involved, nature of incident, and any investigation or prosecution:

57. Have you ever known anyone who suffered a loss due to the murder of a family member or close friend?

☐YES ☐NO If yes, please explain who was involved, and what impact this experience had on this person and the other friends and family of the murder victim:

58. Have you ever been accused of, charged with, convicted, or acquitted of a crime? ☐YES ☐NO

If yes, please describe the situation, when it occurred, who was involved, and the outcome:

59. Has anyone you know well, such as a friend or family member ever been accused of, charged with, convicted, or acquitted of a crime? ☐YES ☐NO If yes, please describe the situation, when it occurred, who was involved, and the outcome:

60. What are your opinions about psychiatrists, psychologists, or other mental health professionals who come to court and testify in some criminal cases?

61. What are your opinions about defendants who claim insanity as a defense to violent crimes such as murder?

62. Do you believe that mentally ill or insane defendants should be convicted the same as any other person when they commit violent acts, such as killing innocent people? ☐YES ☐NO Explain:

63. Do you believe that mentally ill or insane defendants should be punished the same as any other person when they commit violent acts, such as killing innocent people? ☐YES ☐NO Explain:

64. What is your opinion about insanity as a defense to a violent crime, like murder?

65. In general what are your opinions about gun control laws and legislation in the U.S. and the State of Washington? (i.e., should we have more or less regulation? Which laws do you approve or disapprove of?)

66. Do you or anyone in your household currently own any guns? ☐YES ☐NO If yes, please explain who owns the gun(s), the types of guns owned, and the purpose (i.e. hunting, collecting, self-defense, etc):

67. In your personal opinion, are people of certain ethnic or racial groups more likely to commit violent crimes than others? ☐YES ☐NO Please explain your thoughts:

68. Have you ever served as a juror before? ☐YES ☐NO If yes, how many times? _____

a) In what type of case(s) have you served as a juror (*Examples: car wreck, burglary, malpractice, etc*)?

b) Where was the court located where you performed your previous jury service?

c) Were you ever the foreperson? ☐YES ☐NO If yes, how many times? _____

d) Have you ever served on a jury where you did not reach a verdict? ☐YES ☐NO If yes, please explain:

e) Without disclosing the verdict, were you satisfied or dissatisfied with the outcome(s) of the trial(s) where you served? Please explain:

f) Were you ever responsible for determining the sentence in a criminal trial? ☐YES ☐NO

If yes, what procedure did you follow?

69. Have you ever testified as a witness in court or in a deposition? ☐YES ☐NO If yes, please explain:

70. In your opinion, what are three of the biggest problems with our criminal justice system today?

71. In your opinion, what are three of the best things about our criminal justice system today?

PERSONAL LIFE EXPERIENCES

72. Have you *or* anyone close to you ever been mentally, physically, or emotionally abused or neglected as a child? (check all that apply) ☐YES (self) ☐YES (other) ☐NO If yes, please describe who, the circumstances, and how the abuse or neglect affected those involved as they grew up and in their current life:

73. Have you or anyone close to you ever been diagnosed or treated for any mental or thought disorder such as delusional disorder, bipolar disorder, schizophrenia, depression, obsessive compulsive disorder, or any other similar issue? ☐YES (self) ☐YES (other) ☐NO If yes, please explain:

74. Do you have any personal or professional experience, training or education related to psychology, psychiatry, or persons with mental or thought disorders such as delusional disorder, bipolar disorder, schizophrenia, depression, obsessive compulsive disorder, or similar issues? ☐YES ☐NO If yes, explain:

75. Have you ever had any personal or professional experience with a person suffering with permanent paralysis such as paraplegia or quadriplegia? ☐YES ☐NO If yes, please explain:

76. Have you ever experienced or witnessed racial discrimination or prejudice directed towards a child by individuals or a community? ☐YES ☐NO If yes, please explain:

COMMUNITY AND MEDIA INTERESTS

77. What social or professional groups, organizations, or volunteer groups do you belong to or support with financial or other contributions?

78. Have you ever held an office or position of leadership in a group or organization? ☐YES ☐NO
If yes, please explain:

79. What are your favorite hobbies and spare-time activities?

80. Please indicate which of the following best describes your political views:

☐ Very liberal ☐ Somewhat liberal ☐ Moderate ☐ Somewhat conservative ☐ Very conservative

81. Of the following, which cable news channel do you watch most often?

☐ Fox News Channel ☐ CNN ☐ MSNBC ☐ Other: _____

82. What local or national radio news or talk shows do you listen to most often?

83. What television shows do you regularly like to watch?

84. What magazines, newspapers or websites do you regularly read?

85. What types of books do you like to read?

86. Do you have an online blog or web page, or have you participated in online discussions on sites like that? ☐YES ☐NO If yes, please explain:

87. Do you have an online social network account, such as "Facebook", "MySpace," "Twitter," or "Instagram? ☐YES ☐NO If yes, please explain and describe:

88. In your opinion, is there anything else you now know about this case, the crime, the issues, or the people involved, or your own background, experience, or circumstances, that might hinder you, even slightly, from being as fair and impartial a juror as you would like to be? ☐YES ☐NO If yes, please explain:

89. Is there anything in this questionnaire, or anything else at all, which you would like to discuss with the judge and attorneys during individual voir dire, outside the presence of the other jurors? ☐YES ☐NO

Please review the names and entities on the attached list before answering this final question:

90. Are you familiar with any of the individuals or organizations named? ☐YES ☐NO ☐UNSURE

If yes or unsure, indicate who you know, or may know, and how you are or may be familiar with them:

***** You are instructed by the court not to discuss or research anything about this case by any means, including the internet, social media, radio, newspapers, discussions with others, or in any other manner. Your failure to abide by this directive may result in contempt of court proceedings against you.*****

With my signature below, I solemnly swear or affirm that the answers given above and on the attached sheets are true, correct and complete.

Signature (name or number): _____

Date and place signed: October 10, 2014, Seattle, WA.

ADDITIONAL COMMENT PAGE

(Please mark your responses to reflect the question number to which you are responding. Thank you.)

[illegible]