

JURY QUESTIONNAIRE

Instructions for Jury Questionnaire

This questionnaire is designed to obtain information about your background as it relates to your service as a juror in this case. We are using it to shorten the jury selection process. The purpose of these questions is to determine whether prospective jurors can impartially decide this case based solely on the evidence presented at trial and the instructions on the law given by the judge. All information contained in this questionnaire will be kept confidential and under seal.

Please write your assigned juror number at the top of each page. Respond to each question. Your candor and honesty are necessary so that both the prosecution and the defense will have a meaningful opportunity to select an impartial jury. Your cooperation is of vital importance.

You are sworn to give true and complete answers, and those answers will be available only to the Court and the parties in this case. You are instructed not to discuss this case or the questionnaire with anyone, including your family and fellow jurors.

Please fill out the entire questionnaire. Do not leave any questions blank. If a question does not apply to you in any way, write "N/A" rather than leaving the form blank.

PLEASE PRINT LEGIBLY - PLEASE USE ONLY BLACK OR BLUE INK

(NO PENCILS)

Juror Number: _____

Personal Information

1. Name: _____
2. Sex: _____
3. Date of Birth: _____
4. Place of Birth: _____
5. Address: _____
6. How long have you lived in the District of Columbia? _____

Employment

7. Are you employed?

_____ Yes _____ No

- A. If employed, what is your current occupation / job title? _____

- B. Name of employer: _____
- C. How long have you been employed at your current job? _____

8. If you are unemployed, please describe any other responsibilities you may have (childcare, school, etc.).

9. If you are retired or between jobs, what type of work had you been doing?

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10. If you live with a spouse or significant other, is that person employed?

_____ Yes _____ No

A. If employed, what is his or her current occupation / job title?

B. Name of the employer:

Education

11. Check the highest level of education for you and your spouse or significant other:

	<u>You</u>	<u>Spouse/Significant Other</u>
A. Grade school or less	_____	_____
B. Some high school	_____	_____
C. High school graduate	_____	_____
D. Technical or business school	_____	_____
E. Some college	_____	_____
F. College degree	_____	_____
G. Graduate degree (and describe area)	_____	_____ Area: _____

12. If you are a student now, please describe briefly your area of study:

Juror Number: _____

13. Do you have any difficulty speaking, understanding, reading, or writing the English language?

_____ Yes _____ No

A. If yes, please explain what is difficult for you:

News/Media

14. What is your main source for news? [Check the one you rely on the most.]

- _____ Newspapers/Magazines
- _____ TV or Radio
- _____ Internet/Social media websites

15. Please list any newspapers, magazines, TV or radio shows, or Internet or social media websites that you read, watch, or listen to on a regular basis for news:

Juror Number: _____

Military Service

16. Have you or your spouse or significant other ever served in the armed forces?

_____ Yes _____ No

A. If yes, please answer the following, both as to yourself and/or your spouse or significant other:

	<u>You</u>	<u>Spouse/Significant Other</u>
Branch and highest rank or rate	_____	_____
Dates of Service	_____	_____

Criminal Justice Experience

17. Have you, or has any close friend or family member, ever been the victim of or a witness to a crime, whether or not that crime was reported to law enforcement authorities?

_____ Yes _____ No

A. If yes, please provide the following information for each person and incident:

<u>Relationship of person to you?</u>	<u>Type of of Crime?</u>	<u>Victim or Witness?</u>	<u>Police Report?</u>	<u>Was Anyone Caught?</u>	<u>Case Outcome?</u>
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18. Have you, or has any close friend or family member, ever been accused of, arrested for, or charged with a crime?

_____ Yes _____ No

A. If yes, please provide the following:

<u>Relationship?</u>	<u>Type of crime?</u>	<u>Case Outcome?</u>
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19. IF YOUR ANSWER TO EITHER QUESTION 17 OR 18 IS YES: Do you feel that you or the close friend or family member involved was treated fairly by the criminal justice system?

20. Have you, or has any member of your family or close friend or relative, ever been audited by the Internal Revenue Service?

_____ Yes _____ No

A. If yes, please provide the following:

<u>Relationship (myself, father, etc.)</u>	<u>Date of Audit</u>	<u>Outcome?</u>
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B. If yes, do you feel that the person involved was treated fairly by the Internal Revenue Service?

21. Have you or a close friend or family member ever been the subject of any other kind of law enforcement investigation or administrative enforcement proceeding?

_____ Yes _____ No

A. If yes, please describe the subject matter of the investigation, the government agency involved, and the outcome.

B. Do you feel that you or your friend or family member was treated fairly by the government agency involved?

22. Apart from jury service, have you ever been involved in any legal proceeding, in any capacity, for example as a plaintiff, defendant, victim, lawyer, witness, or expert?

_____ Yes _____ No

A. If yes, please state when and explain why you appeared in court:

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B. If yes, did the legal process in that instance operate fairly in your opinion?

Jury Service

23. Have you ever served as a juror at a trial in a federal, state, or local court prior to today?

_____ Yes _____ No

A. If yes, without disclosing the verdict that you reached, please complete the following for each trial on which you served as a juror:

<u>Criminal or Civil?</u>	<u>Type of Allegations?</u>	<u>When did you serve?</u>	<u>Where did you serve?</u>	<u>Did the jury reach a verdict?</u>
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24. Have you ever served as a juror on a grand jury in federal or state court?

_____ Yes _____ No

A. If yes, when and where: _____

B. Were there any cases in which the grand jury was unable to reach agreement on the issuance of true bills?

_____ Yes _____ No

C. If your answer to the prior question is yes, describe the case or cases on which the grand jury on which you served was unable to reach agreement.

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Law Enforcement

25. Have you, or any members of your family, ever been employed by any law enforcement agency, such as: a police department, sheriff's department, constable's office, the Federal Bureau of Investigation (FBI), the Drug Enforcement Administration (DEA), the Bureau of Alcohol Tobacco and Firearms (ATF), the U.S. Marshal's Service, the U.S. Park Police, a United States Attorney's Office, the United States Department of Justice, a District or State's Attorney's Office, a probation or parole office, the Bureau of Prisons, or any other state, local, or federal law enforcement agency or private security force?

_____ Yes _____ No

A. If yes, for each person (yourself or family member) please list the law enforcement office or agency, when the person worked there (if you know), and a general description of the work he or she did:

B. If yes, would that connection to law enforcement employment prevent or hinder you in any way from reaching a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

26. Have you, or any members of your family, ever been employed by the Internal Revenue Service?

_____ Yes _____ No

A. If yes, for each person (yourself or family member) please indicate the period of time employed, if known, and a general description of the job duties:

Juror Number: _____

B. If yes, would that employment prevent or hinder you in any way from reaching a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

27. A number of witnesses may be either federal or state law enforcement officers. Is there anything about that fact alone that will make it difficult for you to evaluate their testimony fairly and impartially in accordance with the Court's instructions? Put another way, would you tend to believe or to disbelieve the testimony of a law enforcement witness merely because that person is a law enforcement officer?

_____ Yes _____ No

A. If your answer is yes, please explain:

28. In this case, the United States is represented by the United States Department of Justice through Special Counsel Robert S. Mueller, III. Is there anything about the Special Counsel's Office that would prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

_____ Yes _____ No

A. If yes, please explain why:

Juror Number: _____

Work/Financial Experience

29. Have you, or any member of your immediate family, ever been employed as an auditor, mortgage officer, tax preparer, or accountant?

_____ Yes _____ No

A. If yes, for each person (yourself or family member) please indicate the period of time employed, if known, and a general description of the job duties:

B. If yes, would that employment prevent or hinder you in any way from reaching a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

30. Have you ever had a foreign bank account?

_____ Yes _____ No

31. Have you, or any member of your immediate family, ever worked in the legal profession in any way, either as a lawyer, paralegal, or as an administrative assistant in a law office, including a prosecutor's or public defender's office?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

B. If yes, would that legal employment prevent or hinder you in any way from reaching a fair and impartial verdict in this case solely on the evidence presented and the Court's instructions on the law:

32. Have you, or any member of your immediate family, had any legal training, including law courses, paralegal programs, or on-the-job training?

_____ Yes _____ No

A. If yes, please explain:

B. If yes, would that legal training prevent or hinder you in any way from reaching a fair and impartial verdict in this case solely on the evidence presented and the Court's instructions on the law:

Juror Number: _____

Nature of the Evidence and the Charged Crimes

33. The indictment charges the defendant with conspiracy involving filing false tax returns and failing to report foreign bank accounts; money laundering conspiracy; failing to register as a foreign agent; making false statements to the government; and attempting to tamper with a witness (and related conspiracy offenses). Is there anything about the nature of those charges alone that would make it difficult for you to be a fair and impartial juror in this case?

_____ Yes _____ No

A. If yes, please explain:

34. The indictment charges in part that income involved in the tax conspiracy and money laundering conspiracy charges was derived from lobbying, political consulting, and public relations work. Is there anything about the nature of those charges that would make it difficult for you to be a fair and impartial juror in this case?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

35. The indictment charges that income involved in the charges was derived from work for the government of Ukraine and certain Ukrainian government officials, politicians, and political parties, in particular, President Victor Yanukovich, the Party of Regions, and the Opposition Bloc. Is there anything about those allegations that would make it difficult for you to be a fair and impartial juror in this case?

_____ Yes _____ No

A. If yes, please explain:

36. Some of the witnesses in this case may be people who were involved in crimes themselves. They would testify as part of a cooperation agreement with the government, or as part of a guilty plea, or under an order from the Court giving them immunity. Is there anything about that circumstance that will make it difficult for you to evaluate their testimony fairly and impartially in accordance with the Court's instructions?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

Knowledge of the Case

37. This case has received significant publicity in the media. Have you seen, read, or heard anything at all about this case in any form of media, including newspaper, television, radio, or internet?

_____ Yes _____ No

A. If yes, please explain, to the best of your recollection, (i) what you have seen, read, or heard, (ii) the source of that information, and (iii) when that occurred:

38. Has the news coverage or any other information you have seen, read, or heard led you to form an opinion about the defendant's guilt or innocence of the charges in this case?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

39. Have you personally written, blogged, or posted anything about this defendant or this case?

_____ Yes _____ No

A. If yes, please describe when and where you did so and the subject of your comments:

40. Would you be able to put to one side everything you have seen, read, or heard about this case, and not consider that information at all, and decide the case fairly and impartially based solely on the evidence presented in the courtroom and the Court's instructions of law?

41. You have been instructed this morning, and you will continue to be instructed if you are selected as a juror, that you may not communicate with anyone about the case, or read or pay attention to any news or social media coverage the case may receive. Is there anything you know of today that will prevent you from complying with that instruction?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

42. Have you or any close friend or family member ever run for or held a political office in the federal, state, or local government?

_____ Yes _____ No

A. If yes, would anything about that person's running for or holding political office cause you to form an opinion about the defendant's guilt or innocence?

_____ Yes _____ No

B. If yes, please explain:

43. Have you ever been actively involved in, a volunteer for, or contributed to a political campaign, party, or organization?

_____ Yes _____ No

A. If yes, would anything about that experience cause you to form an opinion about the defendant's guilt or innocence?

_____ Yes _____ No

B. If yes, please explain:

44. You may hear some limited amount of evidence that individuals involved in this case were associated at some time with the Trump campaign. Is there anything about that information that would make it difficult for you to remain fair and impartial to both sides and to return a verdict based solely on the evidence in accordance with the Court's instructions?

Juror Number: _____

45. Do you, any member of your immediate family, or any close personal friend have any connection to Ukraine?

_____ Yes _____ No

A. If yes, would anything about that connection to Ukraine cause you to form an opinion about the defendant's guilt or innocence?

_____ Yes _____ No

B. If yes, please explain:

Knowledge of People Associated with the Case

46. The following is a partial list of individuals whose names may come up in connection with this case. Do you, to your knowledge, have any personal, family, or business connection of any sort with any of them? If yes, please circle the name(s) of the person and explain that connection in the space below:

Aegis Holdings LLC

Marc Baldinger

Begemot Ventures International

Samuel Patten

Akin Gump Strauss Hauer and Feld

Melissa Laurenza

Big Picture Solutions, Inc.

Joel Maxwell

Alan Couture

Maximillian Katzman

CXSSR

Chris Badeaux

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Daniel J. Edelman, Inc.

Christopher Deri

Davis Manafort Partners, Inc. / DMP
International LLC

Rick Davis

Rick Gates

Philip Griffin

Konstantin Kilimnik

Paul Manafort

Devine Mulvey Longabaugh

Thomas A. Devine

European Centre for a Modern Ukraine

Andy Edgel

Ina Kirsch Van de Water

Rob Van de Water

European Politicians

Mevlut Çavuşoğlu, Minister of Foreign
Affairs of Turkey

Alfred Gusenbauer, former Chancellor
of Austria

Aleksander Kwasniewski, former
President of Poland

Romano Prodi, former Prime Minister
of Italy

Fact Based Communications (FBC)

Jennifer Armes

Susana Braz

Alan Friedman

Andrea Giannotti

Eli Hadzhieva

Elizabeth Klapprott

Patrizia Marin

Jess Panesar

Alanna Putze

Eckart Sager

Peter Sich

Tim Stott

Gino Trisolino

Federal Bureau of Investigation

Morgan Magionos

Omer Meisel

Renee Michael

Michael Mikuska

Jeffrey Weiland

Federal Stone and Brick LLC

Doug DeLuca

First Republic Bank

Hesham Ali

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FTI Consulting

Jon Aarons

Jonathan Hawker

House of Bijan

Ronald Wall

Internal Revenue Service

Michael Welch

Robert Valdini

JadeRog

Jason Maloni

J&J Oriental Rug Gallery

Joshua Nabatkhorian

Kositzka, Wicks & Co.

Philip Ayliff

Naji Lakkis

Cindy LaPorta

Conor O'Brien

McEneaney Associates Inc, Realtors

Wayne Holland

Mercedes Benz

Daniel Opsut

Mercury/Clark & Weinstock

Cheryl Faunce

Kirill Goncharenko

Ed Kutler

John Lonergan

Mike McSherry

Sam Obenhaus

Lucy-Claire Saunders

Vin Weber

Andrew Wright

New Leaf Landscape Maintenance

Michael Regolizio

Nigro Karlin Segal Feldstein & Bolno

Heather Washkuhn

Other Entities

Alexandria Land Rover/Don Beyer
Motors

First Nationwide Title Agency

Kennington Vanguard

Land, Carrrol & Blair, P.C.

MC Brooklyn Holdings LLC

MC Soho Holdings LLC

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Other Individuals

Bruce Baldinger

Andrea Manafort

Jessica Manafort

Kathleen Manafort

Jeffrey Yohai

Podesta Group

John Anderson

Cristina Antelo

Matt Baker

Michael Burns

Ben Chang

Scott Chesson

Christy Clark

Rebecca Edgar

Kimberley Fritts

Kevin Griffis

Andrew Kauders

Molly McKew

Gwen Mellor

Anthony Podesta

Stephen Rademaker

Mark Tavlarides

Kenneth Zoeller

RSH Campaigns

Daniel Rabin

Sabetello Construction

Carl Sabetello

Scott L. Wilson Landscaping & Tree
Specialists, Inc.

Scott L. Wilson

Sensoryphile Inc.

Greg Garland

Skadden, Arps, Slate, Meagher & Flom

Matthew Cowie

Greg Craig

Ken Gross

Kelvin Reese

Cliff Sloan

Alex Van Der Zwaan

Patty Zweibel

SP&C Home Improvement

Stephen Jacobsen

Treasury Department

Paula Liss

Juror Number: _____

Ukrainian Politicians

Rinat Akhmetov

Mykola Azarov

Tevgeny Geller

Kostyantyn Gryshchenko

Vitaliy Kalyuzknyy

Valeriy Khoroshkovsky

Andriy Klyuyev

Sergiy Klyuyev

Boris Kolisnikov

Leonid Kozhara

Dmytro Kuleba

Oleksandr Lavrynovych

Valeriya Lutkovska

Serhiy Lyovochkin

Mykhaylo Okhendovsky

Andrii Olefirov

Andrii Portnov

Viktor Pshonka

Yulia Tymoshenko

Oleg Voloshyn

Viktor Yanukovych

Oleksandr Yefremov

Viktor Yushchenko

47. The lawyers representing the United States during this trial will be Andrew Weissmann, Greg Andres, and Jeannie Rhee; and the lawyers representing the defendant will be Kevin M. Downing, Thomas E. Zehnle, and Richard W. Westling. Judge Amy Berman Jackson will be the judge presiding over the trial. Do you believe that you know, or have any connection to or association with, any of these people?

_____ Yes

_____ No

A. If yes, please explain who you know and how you know them:

Juror Number: _____

48. The jury will be instructed that the defendant is presumed to be innocent throughout the trial and that the defendant cannot be found guilty of any offense unless and until the government has proven each element of that offense beyond a reasonable doubt. Would you find it difficult for any reason to obey that instruction?

_____ Yes _____ No

A. If yes, please explain:

49. If you are selected as a juror in this case, would it be difficult for you to disregard any ideas, notions, or beliefs about the law you may hold, and render a fair and impartial verdict based solely on the evidence presented and the Court's instructions of law?

50. Jury selection in this case will begin on Monday, September 17, 2018. The Court will not sit on Wednesday, September 19, 2018. The trial, and the presentation of evidence to the jurors who are selected, will begin on Monday, September 24, and the trial is expected to take approximately three weeks. In this respect, you should know that it is unlawful for an employer to discharge, threaten to discharge, intimidate, or coerce any employee because of the employee's jury service. Given this, is there any truly exigent circumstance that would prevent you from serving on this jury?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

51. The Court plans to sit from approximately 9:30 a.m. to 5:00 p.m. each day, with an hour break for lunch and mid-morning and mid-afternoon breaks as well. Do you suffer from any physical or mental condition(s) that would affect your ability to sit for that period of time and pay close and careful attention to the evidence and to render an impartial verdict?

_____ Yes _____ No

A. If yes, please explain:

52. Do you have any moral, religious, or ethical beliefs that prevent you from sitting in judgment of another person in a criminal trial?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

53. Is there anything about the nature of this case, including specifically that (i) it involves allegations of conspiracy including filing false tax returns, money laundering conspiracy, false statements, and attempting to tamper with witnesses and (ii) it involves allegations relating to payments for lobbying work on behalf of Ukrainian politicians, that would prevent or hinder you in any way from rendering a fair and impartial verdict based solely on the evidence presented and the Court's instructions of law?

_____ Yes _____ No

A. If yes, please explain:

54. Is there anything about the nature of the questions in this questionnaire that suggests to you that you will not be able to sit as fair and impartial?

_____ Yes _____ No

A. If yes, please explain:

55. Do you know of any other reason – even if it was not asked in this questionnaire – why you cannot sit as a juror in this case and judge the evidence presented fairly and impartially and apply the law as instructed by the Court?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

I, _____, hereby declare under penalty of perjury that the foregoing answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, or received assistance in completing the questionnaire. I have answered all of the above questions myself.

Signature

Print full name

Date

Juror Number: _____

PLEASE USE THIS PAGE TO CONTINUE ANY OF YOUR ANSWERS. PLEASE INCLUDE THE QUESTION NUMBER NEXT TO EACH RESPONSE.

Lined area for providing answers to questions.