

**COLLINS, MESEREAU, REDDOCK & YU**  
Thomas A. Mesereau, Jr., State Bar Number 091182  
Susan C. Yu, State Bar Number 195640  
1875 Century Park East, 7<sup>th</sup> Floor  
Los Angeles, CA 90067  
Tel.: (310) 284-3120, Fax: (310) 284-3133

**SANGER & SWYSEN**  
Attorneys at Law  
Robert M. Sanger, State Bar No. 058214  
233 East Carrillo Street, Suite C  
Santa Barbara, CA 93101  
Tel.: (805) 962-4887, Fax: (805) 963-7311

**OXMAN & JAROSCAK**  
Brian Oxman, State Bar No. 072172  
14126 East Rosecrans  
Santa Fe Springs, CA 90670  
Tel.: (562) 921-5058, Fax: (562) 921-2298

Attorneys for Defendant  
**MICHAEL JOSEPH JACKSON**

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA BARBARA

JAN 11 2005

GARY M. BLAIR, Executive Officer  
By Carrie L. Wagner  
CARRIE L. WAGNER, Deputy Clerk

*Unsealed pursuant  
to 6/16/05 Court  
order*

**FILED UNDER SEAL**

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

THE PEOPLE OF THE STATE OF  
CALIFORNIA,

Plaintiffs,

vs.

MICHAEL JOSEPH JACKSON,

Defendant.

) Case No. 1133603

) JOINT SUBMISSION OF JURY  
) QUESTIONNAIRE

) Honorable Rodney S. Melville

) Date: January 12, 2005

) Time: 8:30 a.m.

) Dept: SM 8

TO THE CLERK OF THE ABOVE ENTITLED COURT:

Attached hereto is a proposed jury questionnaire which represents a joint submission of both  
the prosecution and the defense. The bold type represents questions requested by the defense and

JOINT SUBMISSION OF JURY QUESTIONNAIRE

1 objected to by the prosecution. The italic type represents questions submitted by the prosecution and  
2 objected to by the defense. The remaining questions are acceptable to both the prosecution and the  
3 defense.

4 Dated: January 11, 2005

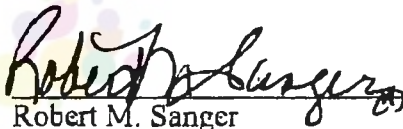
5 Respectfully submitted,

6 COLLINS, MESEREAU, REDDOCK & YU  
7 Thomas A. Mesereau, Jr.  
8 Susan C. Yu

9 SANGER & SWYSEN  
10 Robert M. Sanger

11 OXMAN & JAROSCAK  
12 Brian Oxman

13 By:

14   
15 Robert M. Sanger

16 Attorneys for Defendant  
17 MICHAEL JOSEPH JACKSON  
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CCP 203 Person qualified to be trial jurors

- (1) U.S. Citizen
- (2) Over 18 years of age
- (3) California resident
- (4) Santa Barbara County resident
- (5) Not convicted of a felony
- (6) Possess sufficient knowledge of the English language

I certify that I am qualified to serve as a trial juror \_\_\_\_\_  
(Please initial)

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA BARBARA

THE PEOPLE OF THE STATE OF CALIFORNIA,

CASE NO. 1133603

Plaintiff,

JUROR

vs.

QUESTIONNAIRE

MICHAEL JACKSON,

Defendant.

This questionnaire is designed to obtain information regarding your qualifications to sit as a juror in a pending criminal case. By the use of the questionnaire, the process of jury selection will be substantially shortened.

It is not our intent to embarrass anyone. Your responses here will eliminate the need to ask these questions in open court. There are no right or wrong answers. We need complete answers. The answers you give here will become part of the public record and will be used by the judge, attorneys, and their assistants in selecting a qualified jury. IF ANY QUESTION CALLS FOR A RESPONSE THAT YOU WISH TO REMAIN CONFIDENTIAL, MARK SUCH A QUESTION "CONFIDENTIAL." If any follow-up is required, a private hearing with the judge and attorneys can be conducted to protect your privacy.

Your answers must be given without consulting any other person, must be completed under penalty of perjury, and must be printed in pen (blue or black preferably). If you do have enough room in the allotted space, use the margin or the last page. DO NOT WRITE ON THE BACK OF A PAGE.

You are ordered to not discuss anything connected with this case with anyone, including your family and close friends. Do not allow anyone to discuss these subjects with you. You may tell your family and employer only the name and place of this trial and your time requirements as a juror.

FULL NAME \_\_\_\_\_

PHONE NUMBERS WHERE THE COURT CAN REACH YOU (HOME AND WORK). THESE NUMBERS WILL BE KEPT CONFIDENTIAL AND USED ONLY BY THE COURT.

HOME \_\_\_\_\_ WORK \_\_\_\_\_

THANK YOU FOR YOUR PATIENCE AND COOPERATION

DATE: \_\_\_\_\_

HONORABLE RODNEY S. MELVILLE  
Judge Presiding



DRAFT PROPOSED PROSECUTION  
PRETRIAL JUROR QUESTIONNAIRE

TO THE PROSPECTIVE JUROR:

The information which you give in your answers to this questionnaire will be used only by the court and the parties to select a qualified jury. After a jury has been selected, all copies of your response to this questionnaire will be returned to the Clerk of the Court and kept in confidence, under seal. The attorneys are under orders to maintain the confidentiality of any information they learn in the course of reviewing this questionnaire.

Please answer each question as completely and accurately as you can. Your complete written answers will save a great deal of time for the Court, the parties and you. There are no right or wrong answers to the questions. In order to ensure that your answers are not influenced by the opinions of others, you should fill out the questionnaire by yourself without consulting or talking with any other person.

You are expected to sign your questionnaire, and your answers will have the effect of a statement given under penalty of perjury to the court. What is needed is your very best, honest effort to answer the questions contained in this booklet.

If you cannot answer a question because you do not understand it, write "Do not understand" in the space after the question. If you cannot answer a question because you do not know the answer, write "Do not know" in the space after the question. If you need extra space to answer any question, please use the extra blank sheets of paper included at the end of the questionnaire. Be sure to indicate on the blank page the number of the question you are answering.

If you feel that any question requires an answer which is too sensitive (personal or private) to be included in a public record or discussed in open court, simply write "private" in the left margin next to your answer and any questioning on that topic will be held in private, out of the presence of the other prospective jurors.

The sole purpose of this questionnaire is to encourage your full expression and honesty, so that all parties will have a meaningful opportunity to select a fair and impartial jury to try the issues in this case. Thank you for your full cooperation. It is of vital importance to the Court.

Juror Number: \_\_\_\_\_  
(The number is on your jury summons.)

Date: \_\_\_\_\_

I. BACKGROUND

1. Juror Name: \_\_\_\_\_

2. Have you been known by any other name? Yes \_\_\_\_\_ No \_\_\_\_\_  
a. If yes, what name(s) \_\_\_\_\_

3. Juror Number: \_\_\_\_\_

4. Gender: \_\_\_\_\_ Male \_\_\_\_\_ Female

5. Please state your age: \_\_\_\_\_

a. Date of Birth \_\_\_\_\_

6. Is English your first language? YES [ ] NO [ ]

If no, what is your first language? \_\_\_\_\_

7. Where were you born? (city, state, country)? \_\_\_\_\_

8. Race or ethnic background you most identify with: (check one).

_____ African American/Black	_____ Native American
_____ Caucasian	_____ Asian (specify: _____)
_____ Pacific Islander	_____ Hispanic (specify: _____)
_____ Other (specify: _____)	_____ Multi-racial (specify: _____)

II. RESIDENCE

9. How long have you lived in Santa Barbara County? \_\_\_\_\_  
In California? \_\_\_\_\_

10. What is your current area (i.e. city) of residence including your zip code? (Do not give your address.)  
\_\_\_\_\_

11. How long have you lived at your current residence? \_\_\_\_\_

*If you have lived in Santa Barbara for less than 10 years, where did you live before?* \_\_\_\_\_

12. Do you (check one): \_\_\_\_\_ Own \_\_\_\_\_ Rent \_\_\_\_\_ Neither

If "Neither", please explain: \_\_\_\_\_

### III. FAMILY

#### 13. Marital Status:

- |  |   |
|--|---|
| <input type="checkbox"/> Single, never married | <input type="checkbox"/> Married                                  |
| <input type="checkbox"/> Separated             | <input type="checkbox"/> Divorced                                 |
| <input type="checkbox"/> Widowed               | <input type="checkbox"/> Single and living with significant other |

- a. How many times have you been married? \_\_\_\_\_
- b. How many times have you been divorced? \_\_\_\_\_
- c. If married, how long have you been married? \_\_\_\_\_
- d. If living with a significant other, how long have you lived with this person? \_\_\_\_\_

#### 14. If married or living with a partner, what is your spouse's or significant other's job or occupation?

Job and Employer: \_\_\_\_\_

- a. If he or she is retired or unemployed, what was his or her occupation before retiring or being unemployed? \_\_\_\_\_
- b. If married or living with a partner, what is his or her level of education? \_\_\_\_\_
- c. If previously married, what was your former spouse's occupation? \_\_\_\_\_

#### 15. Do you have children, stepchildren or foster children?

- ☐ Yes, and at least one lives at home
- ☐ Yes, but none live at home
- ☐ No

#### 16. Please list the age, sex, occupation (or area of study), and marital status of each of your children or stepchildren:

<u>Age</u>	<u>Male/Female</u>	<u>Occupation (area of study)</u>	<u>Marital status</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

17. If you have children or have cared for children in your home:

How would you describe your parenting style?

\_\_\_\_\_

18. Have you ever discussed sex with any child? Yes \_\_\_\_\_ No \_\_\_\_\_

19. Have you ever discussed with any child the difference between "good touches" and "bad touches?" Yes \_\_\_\_\_ No \_\_\_\_\_

20. Have you ever discussed with any child what they should do if they are touched inappropriately?  
Yes \_\_\_\_\_ No \_\_\_\_\_

21. *Where were your parents born? (City, State, Country)*

*Mother:* \_\_\_\_\_

*Father:* \_\_\_\_\_

*If they were not born in the United States, when did they come to this country?*

*Mother:* \_\_\_\_\_ *Father:* \_\_\_\_\_

22. What are/were your parents' occupations? (If a parent is deceased, please state his or her former occupation.)

A. Mother \_\_\_\_\_

B. Father \_\_\_\_\_

C. How would you describe your own parents' parenting style?

\_\_\_\_\_

23. If anyone else is living in your home, what is their relationship to you, age and ccupation?

\_\_\_\_\_

24. Do you have any brothers or sisters? Yes [ ] No [ ]

If yes:

a. How many brothers? \_\_\_\_\_

b. How many sisters? \_\_\_\_\_



c. Where do you fall in terms of age in relation to your siblings? (Oldest, middle child, youngest?) \_\_\_\_\_

d. How close are you to your siblings? \_\_\_\_\_ close to some, but not to others  
\_\_\_\_\_ very close to all  
\_\_\_\_\_ somewhat close to all  
\_\_\_\_\_ not very close to any  
\_\_\_\_\_ not at all close to any

25. Would you say that you or your spouses were raised in a “dysfunctional” family?  
If yes, please explain:

\_\_\_\_\_

26. Have you or any relatives ever received any type of psychological treatment such as therapy or counseling?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

27. Have you or any family member ever received any type of drug or alcohol counseling?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please provide details.

Were you satisfied with the outcome? \_\_\_\_\_

#### IV. EDUCATION AND TRAINING

28. What is your highest level of education completed?

\_\_\_\_\_ Less than high school degree: what is highest grade completed? \_\_\_\_\_

\_\_\_\_\_ High School Degree

\_\_\_\_\_ Technical, Trade or Vocational

\_\_\_\_\_ Some College

\_\_\_\_\_ 2-year AA Degree

\_\_\_\_\_ 4-year College Degree (B.A., B.S.)

\_\_\_\_\_ Some Graduate School

\_\_\_\_\_ Graduate Degree (M.A. or higher)

Please list all degrees, certificates, licenses, and major areas of study:

\_\_\_\_\_

State when and from what schools you obtained your degree(s), certificate(s) or license(s): \_\_\_\_\_

Did you consider yourself a ☐ good ☐ average ☐ poor student?

If you attended school after high school, including any trade or vocational schools, please list the type of school, your major area of study and any certificates or degrees that you received:

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29. Do you have further educational plans for the future? ☐ Yes ☐ No  
If "yes" please describe: \_\_\_\_\_

30. Do you consider yourself to be an expert on any subject? ☐ Yes ☐ No  
If "yes" what subjects? \_\_\_\_\_

31. Have you ever studied or received training in psychology, forensic psychology, psychiatry, social work, sociology or counseling? ☐ Yes ☐ No

32. If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

33. Have you ever studied or received any training or worked in any medical or scientific field? ☐ Yes ☐ No

34. If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

35. Do you have any friends who are physicians, psychiatrists, or psychologists?  
☐ Yes ☐ No

If yes, please name them and the type of medicine or area they specialize in:

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36. Have you ever studied or received any training or worked in law or law related fields?  
☐ Yes ☐ No

If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

37. Have you ever taken any law courses? ☐ Yes ☐ No

If yes, please explain: \_\_\_\_\_

38. Have you received any training or worked in a laboratory, medical research or testing facility?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain: \_\_\_\_\_

39. Have you received any training, worked, or volunteered in children or family services?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain: \_\_\_\_\_

40. Have you ever worked or volunteered for a child advocacy group or for a group dealing with child safety, child abuse or mistreatment, or children's rights?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain: \_\_\_\_\_

41. 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)

- |                                      |                                    |
|--------------------------------------|------------------------------------|
| _____ Banking/Finance                | _____ Corrections/Jail/Prison      |
| _____ Drugs/alcohol                  | _____ Engineering                  |
| _____ Entertainment, performing arts | _____ Handwriting analysis         |
| _____ Forensic sciences              | _____ Firearms/Guns                |
| _____ Genetics/DNA                   | _____ Journalism/news              |
| _____ Investigations                 | _____ Laboratory science           |
| _____ Justice systems/courts         | _____ Local/state government       |
| _____ Law enforcement                | _____ Pathology                    |
| _____ Medicine/nursing               | _____ Statistics                   |
| _____ Mental health                  | _____ TV/radio                     |
| _____ Police procedures              | _____ Telecommunications           |
| _____ Science or biology             | _____ Victims of crimes            |
| _____ Security                       | _____ Women's rights organizations |

If yes to any of these, please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

42. Are you related to or close friends with anyone who works or has special training in any of the following areas? (check each one that applies to them)

<input type="checkbox"/> Banking/Finance	<input type="checkbox"/> Corrections/Jail/Prison
<input type="checkbox"/> Drugs/alcohol	<input type="checkbox"/> Engineering
<input type="checkbox"/> Entertainment, performing arts	<input type="checkbox"/> Handwriting analysis
<input type="checkbox"/> Forensic sciences	<input type="checkbox"/> Firearms/Guns
<input type="checkbox"/> Genetics/DNA	<input type="checkbox"/> Journalism/news
<input type="checkbox"/> Investigations	<input type="checkbox"/> Laboratory science
<input type="checkbox"/> Justice systems/courts	<input type="checkbox"/> Local/state government
<input type="checkbox"/> Law enforcement	<input type="checkbox"/> Pathology
<input type="checkbox"/> Medicine/nursing	<input type="checkbox"/> Statistics
<input type="checkbox"/> Mental health	<input type="checkbox"/> TV/radio
<input type="checkbox"/> Police procedures	<input type="checkbox"/> Telecommunications
<input type="checkbox"/> Science or biology	<input type="checkbox"/> Victims of crimes
<input type="checkbox"/> Security	<input type="checkbox"/> Women's rights organizations

If yes to any of these, please explain: \_\_\_\_\_

43. Have you, a family member or close friend ever worked either in a paid or unpaid capacity in any aspect of Entertainment news (i.e., for Variety, Entertainment Weekly, etc.)?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, who (relationship to you): \_\_\_\_\_

Please list where you/they worked, job title and duties: \_\_\_\_\_

44. Have you or anyone you know ever worked, either in a paid or unpaid capacity, in the Entertainment industry (i.e., as a screenwriter, producer, actor, etc.)

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, who (relationship to you): \_\_\_\_\_

Please list where you/they worked, job title and duties: \_\_\_\_\_

45. Have you or anyone you know ever worked in the Music industry (i.e., as a musician, songwriter, producer, etc.)

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, who (relationship to you): \_\_\_\_\_

Please list where you/they worked, job title and duties: \_\_\_\_\_

46. Have you, any relatives or close friends ever worked in or studied journalism, the media, or the news industry in any capacity?

If yes, who (relationship to you): \_\_\_\_\_

47. Have you ever written any books or articles of any kind?

Yes [ ] No [ ]

If yes, please explain. \_\_\_\_\_

48. Have you or anyone you know, either in a paid or unpaid capacity, ever worked for a newspaper, TV station or TV show?

Yes \_\_\_\_\_ No \_\_\_\_\_

#### V. EMPLOYMENT

49. What is your present employment status? (Check all that apply.)

\_\_\_\_\_ Full time  
\_\_\_\_\_ Part time  
\_\_\_\_\_ Homemaker  
\_\_\_\_\_ Retired  
\_\_\_\_\_ Disabled  
\_\_\_\_\_ Student  
\_\_\_\_\_ Unemployed and looking for work  
\_\_\_\_\_ Unemployed and NOT looking for work

50. What is your present job or occupation? \_\_\_\_\_

a. Name of employer: \_\_\_\_\_

b. What are/were you duties and responsibilities? \_\_\_\_\_

c. Do/did you make policy decisions? \_\_\_\_\_ Yes \_\_\_\_\_ No

d. Do/did you have authority to hire and fire employees? \_\_\_\_\_ Yes \_\_\_\_\_ No

e. How long have you worked at your current job \_\_\_\_\_



51. If you (a) have been with your current employer less than ten years or (b) if you checked unemployed, retired, disabled or student, please answer the following questions about your last job:

How long were you at this job? \_\_\_\_\_ Termination date: \_\_\_\_\_

Reason for termination: \_\_\_\_\_

Name and location of employer: \_\_\_\_\_

Job title: \_\_\_\_\_

Duties (describe briefly): \_\_\_\_\_

52. Please list the types of jobs you have had or work you have done as an adult. (Start with your first job and work forward.)

Type  
of work

Employer

For how long?


53. Do/did you supervise others? If so, how many?

54. How do/did you feel about supervising others?


55. If not working:

a. What was your last job or occupation? \_\_\_\_\_

b. What is your customary work? \_\_\_\_\_

56. If you are in school, what school do you attend and what are you studying?

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57. Are you a union member? \_\_\_\_\_ Yes \_\_\_\_\_ No

58. Do you support the goals of unions nowadays? \_\_\_\_\_ Yes \_\_\_\_\_ No

59. Have you or a family member ever owned or run your own business?  
\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please describe who and the type of business: \_\_\_\_\_  
\_\_\_\_\_

60. Have you ever considered or pursued a career in law enforcement or investigations?  
\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

## VI. PERSONAL

61. Have you or any relatives ever undergone cosmetic or plastic surgery?  
\_\_\_\_\_ Yes \_\_\_\_\_ No

**IF YES:**

a. What was the surgery for? \_\_\_\_\_  
\_\_\_\_\_

b. Were you satisfied with the results? (explain)  
\_\_\_\_\_

c. How many times have you had plastic surgery? \_\_\_\_\_

62. *What civic, social, religious, charitable, volunteer, professional or business organizations do you belong to?*  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

63. *Have you ever held a leadership position in these organizations?*

Yes \_\_\_\_\_ No \_\_\_\_\_

*If yes, please describe.* \_\_\_\_\_

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

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65. Do you have any bumper stickers on your vehicles?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what do the bumper stickers say? \_\_\_\_\_

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66. Do you read books in your spare time? Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what types of books do you like to read, e.g., fiction, romance, science-fiction, mysteries, historical fiction, non-fiction science, non-fiction biographies, etc.? \_\_\_\_\_

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67. Which one source do you most rely on for news:

\_\_\_\_\_ Newspaper

\_\_\_\_\_ Friends

\_\_\_\_\_ Television

\_\_\_\_\_ I do not follow the news

\_\_\_\_\_ Radio

\_\_\_\_\_ Other: \_\_\_\_\_

\_\_\_\_\_ Internet

68. Which newspapers and magazines, if any, do you subscribe to and/or read on a regular basis?

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69. Do you regularly read any magazines or newspapers focusing on entertainment figures, such as *People*, *Us*, *Entertainment Weekly*, *National Enquirer*, *Rolling Stone*, *Spin*, etc.?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, which ones do you read?

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70. How often do you read a newspaper?

\_\_\_\_\_ Daily  
\_\_\_\_\_ Several times per week  
\_\_\_\_\_ Only on Sundays  
\_\_\_\_\_ Seldom or never

71. If you read a newspaper, which section do you read first?

_____ Don't read papers at all	_____ Sports
_____ Front	_____ Entertainment
_____ Local/Metro	_____ Business

72. How many hours a week do you watch television? \_\_\_\_\_

73. Please list the television shows you watch regularly:

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74. Do you regularly watch national news, local news or both?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, which station is your main source of television news?

\_\_\_\_\_ ABC \_\_\_\_\_ FOX \_\_\_\_\_ Other (specify \_\_\_\_\_)

\_\_\_\_\_ NBC \_\_\_\_\_ MSNBC

\_\_\_\_\_ CBS \_\_\_\_\_ CNN

75. Do you watch any news about the Entertainment world?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, which stations or programs do you watch?

\_\_\_\_\_ E! \_\_\_\_\_ Entertainment Tonight

\_\_\_\_\_ MTV \_\_\_\_\_ Behind the Music

\_\_\_\_\_ VH1 \_\_\_\_\_ OTHER (specify \_\_\_\_\_)

\_\_\_\_\_ BET

76. How often, if at all, do you tune in to cable news (i.e., MSNBC, FOX or CNN) programs on TV?:

\_\_\_\_\_ Daily

\_\_\_\_\_ Several times per week

\_\_\_\_\_ Seldom

\_\_\_\_\_ Never

77. Did you follow the O.J. Simpson trial? Yes \_\_\_\_\_ No \_\_\_\_\_

Did it affect your opinion of the criminal justice system? If so, explain:

\_\_\_\_\_

79. Do you have any negative feelings or opinions about people who have plastic surgery?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Depends

80. If yes, do you think your feelings might interfere with your ability to be a fair and impartial juror in this case?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Not sure



81. Are you presently taking any medication?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, what medication and how long have you been taking it?

\_\_\_\_\_  
\_\_\_\_\_

82. Do you have a bumper sticker on your car? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please describe: \_\_\_\_\_

83. What are your hobbies or favorite pastimes? (exercise, reading, riding atv's, wine tasting, volunteer work at church, sewing, cars, fishing, etc)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

84. To what clubs or organizations do you support or have you contributed time or money to (social, political, education, trade, religious, charity, etc)?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

a. Have you ever held a leadership position in these organizations?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Please describe:

\_\_\_\_\_

85. What is your main source of news? (check only one)

_____ Television	_____ Radio
_____ Newspapers	_____ Internet
_____ Friends	_____ I do not follow the news

86. How many hours a week do you watch television? \_\_\_\_\_

87. If you read magazines or newspapers which ones do you subscribe to or read regularly?

\_\_\_\_\_

88. Do you or anyone in your household read tabloid magazines or newspapers such as *US Weekly*, *People*, *Star*, *National Enquirer*, *Globe*, etc.?

\_\_\_\_\_ Yes (self) \_\_\_\_\_ Yes (other) \_\_\_\_\_ Yes (both) \_\_\_\_\_ No

If yes, about how often?

☐ Daily  
☐ A few times a month

☐ Several times a week  
☐ A few times a year

89. Do you or anyone in your household watch television shows such as Larry King, Greta Van Sustren, Celebrity Justice, the Abrams Report, or Geraldo Rivera?

☐ Yes (self) ☐ Yes (other) ☐ Yes (both) ☐ No

If yes, about how often?

☐ Daily ☐ Several times a week  
☐ A few times a month ☐ A few times a year

90. Do you or anyone in your household watch TV news programs such as 60 minutes, 20/20, or CBS 48 Hours?

☐ Yes (self) ☐ Yes (other) ☐ Yes (both) ☐ No

If yes, about how often?

☐ Daily ☐ Several times a week  
☐ A few times a month ☐ A few times a year

91. Are you familiar with the TV program called *The Swan*?

☐ Yes ☐ No

IF YES:

- a. Do you or anyone in your household watch this program?

☐ Yes (self) ☐ Yes (other) ☐ Yes (both) ☐ No

- b. What are your opinions about the contestants who are part of the show?

\_\_\_\_\_

92. Do you or anyone in your household watch Court TV?

☐ Yes (self) ☐ Yes (other) ☐ Yes (both) ☐ No

If yes, about how often?

☐ Daily ☐ Several times a week  
☐ A few times a month ☐ A few times a year

93. What television and radio programs do you view or listen to on a regular basis?

\_\_\_\_\_  
\_\_\_\_\_

94. What radio stations do you listen to on a regular basis?

\_\_\_\_\_  
\_\_\_\_\_

95. Name three people you MOST admire:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

96. Name three people you LEAST admire:

97. Have you ever written a letter to the editor of a newspaper or magazine?

\_\_\_\_\_ Yes \_\_\_\_\_ No

98. Do you read the editorial page of the newspaper?

\_\_\_\_\_ Yes \_\_\_\_\_ No

99. Have you ever wanted to be a celebrity? \_\_\_\_\_ Yes \_\_\_\_\_ No

100. How often do you access the Internet?

\_\_\_\_\_ Often \_\_\_\_\_ Sometimes \_\_\_\_\_ Never

a. What web sites do you typically visit? \_\_\_\_\_

b. Have you visited any of the following Internet sites?

court.v.com \_\_\_\_\_ Yes \_\_\_\_\_ No

mtv.com \_\_\_\_\_ Yes \_\_\_\_\_ No

vh1.com \_\_\_\_\_ Yes \_\_\_\_\_ No

thesmokinggun.com \_\_\_\_\_ Yes \_\_\_\_\_ No

c. Do you or your family log-on to internet chat rooms?

\_\_\_\_\_ Yes, I do \_\_\_\_\_ Yes, my family does \_\_\_\_\_ No

d. If yes, what topics? \_\_\_\_\_

e. Have you ever visited a chat room that was discussing Michael Jackson?

\_\_\_\_\_ Yes \_\_\_\_\_ No

## VII. EXPERIENCE WITH CANCER

101. Have you, your relatives, or anybody close to you ever been diagnosed with any form of cancer?

\_\_\_\_\_ Yes, I have

\_\_\_\_\_ Yes, a relative has

\_\_\_\_\_ Yes, a close friend has

\_\_\_\_\_ No

IF YES, please explain the nature of the disease, any treatment that was received, and how the disease has affected you personally:

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## VIII. ETHNIC PREJUDICE

102. Have you ever felt uncomfortable around someone of a different race or ethnic group?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain the circumstance: \_\_\_\_\_

103. Have you ever experienced fear of a person of another race? \_\_\_\_\_ Yes \_\_\_\_\_ No

104. Have you ever been exposed to persons who exhibited racial, sexual, religions and/or ethnic prejudice? \_\_\_\_\_ Yes \_\_\_\_\_ No

105. Do you think your feelings about or experiences with people from different races might affect your ability to serve as a fair and impartial juror in this case?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Not sure

## IX. MILITARY

106. Were you or a close family member ever in the military or reserves?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, answer the following.

a. Who was in the military? \_\_\_\_\_

b. What branch? \_\_\_\_\_

c. Date of service? \_\_\_\_\_

d. Rate or final rank? \_\_\_\_\_

e. Where were you/they stationed? \_\_\_\_\_

f. Character of discharge (honorable, general, etc)? \_\_\_\_\_

g. Reason for discharge? \_\_\_\_\_

h. What were your duties? \_\_\_\_\_

i. Were you/they ever involved in any way with military law enforcement, non-judicial punishment, courts martial, or administrative boards or hearings?

\_\_\_\_\_ Yes \_\_\_\_\_ No

j. Were you/they ever in combat? \_\_\_\_\_ Yes \_\_\_\_\_ No

107. When and where were you in combat?

108.. Have you ever been in a combat area? Yes \_\_\_\_\_ No \_\_\_\_\_

**X. JURY SERVICE**

109. How do you feel about jury service?

110. Have you ever served on a jury before? \_\_\_\_\_ Yes \_\_\_\_\_ No

If you have served on a jury before, please answer the following:

a. Please provide the following information for each case in which you served:

Year Civil or Criminal Type of Case Verdict Reached (Yes/No)

Year	Civil or Criminal	Type of Case	Verdict Reached (Yes/No)

b. Were you ever the foreperson? \_\_\_\_\_ Yes \_\_\_\_\_ No

c. Have you ever served on a GRAND JURY before? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please describe where and when: \_\_\_\_\_

d. Did anything occur during your previous jury service that might affect your opinions about the jury system or make you reluctant to serve now?

\_\_\_\_\_ Yes \_\_\_\_\_ No If yes, please explain:

\_\_\_\_\_

e. Would you like to be a juror in this case? \_\_\_\_\_ Yes \_\_\_\_\_ No

Why or why not? \_\_\_\_\_

**XI. LITIGATION**

111. Have you or a family member ever made any type of claim for money damages?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain: \_\_\_\_\_



112. Have you ever been involved in a lawsuit (other than divorce proceedings), including giving a deposition? ☐ Yes ☐ No

If yes, were you: ☐ The plaintiff ☐ The defendant  
☐ Witness ☐ Other

Please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## XII. LAW ENFORCEMENT AND THE CRIMINAL JUSTICE SYSTEM

113. Have you, any friends or relatives ever been involved in law enforcement (for example, F.B.I., D.E.A., Sheriff's Department, County Prosecutor's Office, California Highway Patrol, Attorney General's Office, United States Attorney's Office) or been employed by any such agency? ☐ Yes ☐ No

If yes, please explain:

\_\_\_\_\_  
\_\_\_\_\_

114. Have you, any relatives, or close friends ever been ARRESTED or ACCUSED of a criminal offense (other than minor traffic violations)?

☐ Yes ☐ No

a. If yes, explain who, when, the charges and the outcome.

\_\_\_\_\_  
\_\_\_\_\_

b. If yes, please explain how you feel about the way the matter was handled by the police, prosecution, defense attorney, court, probation department and others involved in the law enforcement and judicial systems:

\_\_\_\_\_

115. Have you, any relatives, or close friends ever TESTIFIED in a court proceeding?

☐ Yes ☐ No

If yes, please explain.

\_\_\_\_\_  
\_\_\_\_\_

116. Are you personally acquainted with any judges, prosecuting attorneys, or criminal defense attorneys, or anyone connected to law enforcement? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please give the name and position of the person(s), how you came to know them, and the extent of your relationship with them: \_\_\_\_\_

117. Are you a member of Neighborhood Watch, M.A.D.D., or any other program devoted to crime prevention or victim's rights? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain: \_\_\_\_\_

118. Have you ever participated in a trial as a party, witness, or interested observer? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain: \_\_\_\_\_

119. What is your attitude, in general, toward law enforcement officers? \_\_\_\_\_

120. Have you, or any member of your family, or close friends, ever been the VICTIM of or WITNESS to a serious crime? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain: \_\_\_\_\_

- a. Was the crime reported to the police? \_\_\_\_\_ Yes \_\_\_\_\_ No
- b. How did you feel about what happened? \_\_\_\_\_

121. Have you or any relative or close friend ever been ACCUSED OF inappropriate sexual behavior?

\_\_\_\_\_ Yes, self \_\_\_\_\_ Yes, family \_\_\_\_\_ Yes, close friend  
\_\_\_\_\_ No

If yes, please explain: \_\_\_\_\_

122. Have you or any relative or close friend ever been CONVICTED OF inappropriate sexual behavior of any kind?

☐ Yes, self  
☐ No

☐ Yes, family

☐ Yes, close friend

a. If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

123. Have you or any relative or close friend ever been THE VICTIM OF inappropriate sexual behavior of any kind?

☐ Yes, self  
☐ No

☐ Yes, family

☐ Yes, close friend

a. If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

124. Are you, any family member or friend registered as a "sex offender"?

Yes ☐ No ☐

If yes, please explain: \_\_\_\_\_

125. Do you have any feelings/opinions about the effectiveness of law enforcement in Santa Barbara County? ☐ Yes ☐ No

Please explain: \_\_\_\_\_

126. In our criminal justice system, the prosecution has to prove that the defendant is guilty. The defendant does not have to prove anything or even testify. Which of the following statements do you agree with more? (Circle one.)

1 = The prosecution should have to prove that the defendant is guilty

2 = The defendant should have to prove that he is innocent

127. In general, do you believe that the criminal justice system: (Circle one.)

1 = Lets too many people go free

2 = Convicts too many innocent people

128. In your opinion, which would be worse in a case of someone being accused of child molestation: (Circle one.)

1 = Letting a guilty person go free

2 = Convicting an innocent person

129. Do you believe that the number of defense attorneys representing a defendant or the number of district attorneys representing the government suggests anything about the likelihood of the innocence or guilt of a defendant?

☐ Yes ☐ No ☐ Not sure

Please explain: \_\_\_\_\_

130. Do you believe that the criminal justice system favors people with money?

☐ Yes ☐ No

Please explain: \_\_\_\_\_

131. Would your attitudes on our criminal justice system influence you to favor the prosecution or the defense before hearing all of the evidence?

☐ Yes ☐ No

Please explain: \_\_\_\_\_

132. If selected as a juror in this case, will you be able to follow the Court's instruction that a defendant arrested for any offense is presumed innocent?

☐ Yes ☐ No ☐ Not sure

133. If selected as a juror in this case, will you be able to follow the Court's instruction that a defendant is innocent until the State proves guilt beyond a reasonable doubt?

☐ Yes ☐ No

134. Do you believe that the testimony of a police officer is entitled to greater, equal, or lesser weight than that of any other witness?

☐ Greater weight ☐ Equal weight ☐ Lesser weight

135. Will you judge the believability of a peace officer by the same standards that you use to judge the believability of other witnesses?

☐ Yes ☐ No

If no, please explain: \_\_\_\_\_

136. How much confidence do you have in the following types of evidence?

	A lot	Some	Not much	Undecided
Eyewitness testimony	_____	_____	_____	_____
DNA	_____	_____	_____	_____
Forensic evidence	_____	_____	_____	_____
Fingerprints	_____	_____	_____	_____
Circumstantial evidence	_____	_____	_____	_____
Expert witness testimony	_____	_____	_____	_____
Psychological expert testimony	_____	_____	_____	_____

### XIII. LAW ENFORCEMENT & JUDICIAL CONTACTS

137. Do you know any judges, attorneys, paralegals, investigators or other people who work for a law firm on a professional, personal or casual basis?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

138. Have you ever had any previous experience as a juror?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, how many times? \_\_\_\_\_

Were they civil or criminal? \_\_\_\_\_

When? \_\_\_\_\_

Briefly state the nature of the case(s) involved: \_\_\_\_\_

Was the case submitted to a jury? \_\_\_\_\_ Yes \_\_\_\_\_ No

Did you participate in the deliberations? \_\_\_\_\_ Yes \_\_\_\_\_ No

Did the jury reach a verdict? \_\_\_\_\_ Yes \_\_\_\_\_ No

Were you ever a foreperson? \_\_\_\_\_ Yes \_\_\_\_\_ No

How would you describe your experience? \_\_\_\_\_



139. . Other than traffic court, have you ever had any interaction with the court system.

(check all that apply):

☐ Criminal court

☐ Probate court

☐ Civil court

☐ Family court

☐ Small claims court

☐ Divorce court

If yes, in your interactions with the court, did you feel that the system treated you fairly?

Yes \_\_\_\_\_ No \_\_\_\_\_

Please explain: \_\_\_\_\_

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140. Have you, ever been accused of, charged with, or convicted of any crime, or been the subject of a criminal investigation, other than a minor traffic violation?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain the nature of the charges, the approximate date, who brought the charges and the outcome:

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Do you feel that you were justly investigated, accused, charged or convicted?

Yes \_\_\_\_\_ No \_\_\_\_\_

Please explain: \_\_\_\_\_

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141. Have any of your family members or close friends ever been accused of, charged with, or convicted of any crime, or been the subject of a criminal investigation, other than a minor traffic violation?

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Yes \_\_\_\_\_ No \_\_\_\_\_

*If yes, please explain the nature of the charges, the approximate date, who brought the charges and the outcome:*

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*Do you feel they were justly investigated, accused, charged or convicted?*

Yes \_\_\_\_\_ No \_\_\_\_\_

*Please explain:* \_\_\_\_\_

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142. *Have you ever known anyone who was investigated for or charged with a crime they did not commit?*

Yes \_\_\_\_\_ No \_\_\_\_\_

*If yes, please explain:* \_\_\_\_\_

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143. *Other than for traffic court or divorce proceedings, have you ever been a witness or given a statement in any type of legal proceeding?*

Yes \_\_\_\_\_ No \_\_\_\_\_

*If yes, please explain:* \_\_\_\_\_

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144. Have you, a family member or close friend ever been the victim of or a witness to a serious crime?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please state who the witness was (relationship to you) and what the crime was:

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Was anyone arrested? Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what was the outcome? \_\_\_\_\_

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If there was a trial, did you testify? Yes \_\_\_\_\_ No \_\_\_\_\_

Were you satisfied with the way law enforcement handled the matter?

Yes \_\_\_\_\_ No \_\_\_\_\_

If no, please explain: \_\_\_\_\_

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145. Have you, any friends or relatives ever been incarcerated?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

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146. Have you, any of your family members or close friends ever been employed by or volunteered in any aspect of a district attorney's office or criminal defense work, including any Public Defender's office, a Legal Aid, or with a related support or advocacy group having to do with the rights of people charged with crimes?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, who (relationship to you): \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

147. Have you, a family member or close friend ever belonged to, donated money to, signed a petition for, or otherwise supported an advocacy group(s) for people accused of crimes or people who are in prison?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, who (relationship to you): \_\_\_\_\_

Which group(s)? \_\_\_\_\_

148. Have you ever visited a person in jail or prison? Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, explain. \_\_\_\_\_

149. Have you ever belonged to or donated money to any group involved in law enforcement or monitoring of the courts, such as: (check any that apply)

Neighborhood Watch	_____
Citizens for Law and Order	_____
Mothers against Drunk Driving	_____
Bay Area Women Against Rape	_____
Any pro-death penalty group	_____
Other	_____

If yes, please explain: \_\_\_\_\_

150. Have you ever belonged to or donated money to any of the following groups:

Amnesty International \_\_\_\_\_  
American Civil Liberties Union \_\_\_\_\_  
Hand Gun Control Incorporated \_\_\_\_\_  
NAACP \_\_\_\_\_  
Any anti-death penalty group \_\_\_\_\_  
Other \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

151. Have you ever had an unpleasant experience with any law enforcement agency?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

152. What is your attitude, in general, toward prosecutors?

\_\_\_\_\_

153. Do you have any, for whatever reason, negative feelings toward the Santa Barbara County District Attorney's Office (including Welfare Fraud, Bad Check Program, Consumer-Environmental, Child Support, or Criminal Division)?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain why you feel this way: \_\_\_\_\_

154. Do you believe that prosecutorial agencies can and do make mistakes in charging people with crimes?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, how often?

\_\_\_\_\_ Frequently \_\_\_\_\_ Rarely  
\_\_\_\_\_ Occasionally \_\_\_\_\_ Never  
\_\_\_\_\_ Don't know



XIV EXPERT WITNESSES - CHILD WITNESSES

155. At what age do you think children can reliably describe things that happen to them?

\_\_\_ 4 to 6 years old

\_\_\_ 7 to 9 years old

\_\_\_ 10 to 12 years old

\_\_\_ 13 to 15 years old

\_\_\_ 15 and older

156. Do you have any feelings about children testifying in a court of law? Please explain: \_\_\_\_\_

157. Do you feel that the testimony of children should be judged differently from adults who testify? Please explain: \_\_\_\_\_

a) Would you require the testimony of a child to be corroborated even though the law does not require such corroboration?

Yes [ ] No [ ]

Please explain: \_\_\_\_\_

## XV. OPINIONS

How strongly do you "Agree" or "Disagree" with each of the following statements? Please circle your response. (Circle one number for each statement.)

158. It is possible for a child to believe he or she was sexually molested even if it is not true.

- 1 = Disagree Strongly
- 2 = Disagree
- 3 = Agree
- 4 = Agree Strongly
- 5 = No opinion

159. People who go through the process of filing a formal complaint of child molestation usually have a valid complaint.

- 1 = Disagree Strongly
- 2 = Disagree
- 3 = Agree
- 4 = Agree Strongly
- 5 = No opinion

160. It is possible for children to be convinced by others that they were molested even if it is not true.

- 1 = Disagree Strongly
- 2 = Disagree
- 3 = Agree
- 4 = Agree Strongly
- 5 = No opinion

161. Reports of child sexual molestation are usually exaggerated.

- 1 = Disagree Strongly
- 2 = Disagree
- 3 = Agree
- 4 = Agree Strongly
- 5 = No opinion

162. Psychiatrists can determine whether or not an adolescent has been molested.

- 1 = Disagree Strongly
- 2 = Disagree
- 3 = Agree
- 4 = Agree Strongly
- 5 = No opinion

163. Celebrities get away with sex crimes because they are able to pay off victims and their families.

- 1 = Disagree Strongly
- 2 = Disagree
- 3 = Agree
- 4 = Agree Strongly
- 5 = No opinion

164. If an individual was accused of child molestation and paid a significant amount of money as a settlement, then that would be an admission of guilt.

- 1 = Disagree Strongly
- 2 = Disagree
- 3 = Agree
- 4 = Agree Strongly
- 5 = No opinion

165. Someone might wrongly accuse an individual of a crime so they can benefit financially.

- 1 = Disagree Strongly
- 2 = Disagree
- 3 = Agree
- 4 = Agree Strongly
- 5 = No opinion

166. Individuals who suffered from mental, physical, or sexual abuse as children are more likely to abuse others when they are adults.

- 1 = Disagree Strongly
- 2 = Disagree
- 3 = Agree
- 4 = Agree Strongly
- 5 = No opinion

167. A family would make up a story about child molestation to get money or media attention.

- 1 = Disagree Strongly
- 2 = Disagree
- 3 = Agree
- 4 = Agree Strongly
- 5 = No opinion

168. It is perfectly all right for people to have plastic surgery purely for cosmetic purposes.

1 = Disagree Strongly  
2 = Disagree  
3 = Agree  
4 = Agree Strongly  
5 = No opinion

169. What is your opinion of individuals who have undergone several plastic surgery procedures purely for cosmetic purposes?
- 

#### XVI. MEMORY

How strongly do you "Agree" or "Disagree" with each of the following statements? Please circle your response for each statement.

170. I doubt that a suggestion made by a mental health expert such as a psychologist can lead to the creation of false childhood memories.

1 = Disagree Strongly  
2 = Disagree  
3 = Agree  
4 = Agree Strongly  
5 = No opinion

171. Scientific methods such as hypnosis or the administration of drugs are valid and reliable ways of helping someone improve his or her memory.

1 = Disagree Strongly  
2 = Disagree  
3 = Agree  
4 = Agree Strongly  
5 = No opinion

172. If a child is having a difficult time recalling certain events, then it is okay for a psychiatrist to administer certain types of drugs to help the child remember those events in an accurate manner.

1 = Disagree Strongly  
2 = Disagree  
3 = Agree  
4 = Agree Strongly  
5 = No opinion

173. If a child is having a difficult time recalling certain events, then it is okay for a psychiatrist to use hypnosis to help the child remember those events in an accurate manner.

1 = Disagree Strongly  
2 = Disagree  
3 = Agree  
4 = Agree Strongly  
5 = No opinion

#### XVII. EXPERT WITNESSES

Both sides will present expert witnesses in this case. Expert witnesses are presented to help the jury understand technical or scientific issues which are not a part of everyday common experience. The jury will be told they may accept the expert's opinion if they find it to be reasonable and they may reject it if they find it unreasonable.

174. Would you be able to listen to and keep an open mind on a witness who is represented to be an expert in some type of psychological or psychiatric field?      Yes      No  
If no, why not? \_\_\_\_\_

175. Would you automatically believe everything an expert said merely because the person is an expert?      Yes      No  
Please explain: \_\_\_\_\_

176. *Would you be able to accept the expert's opinion if it seemed reasonable to you?*

Yes [      ]      No [      ]

*If No, why not?:* \_\_\_\_\_



177. Would you be able to disregard the expert's opinion, if it seemed unreasonable?

Yes [ ] No [ ]

If No, why not?: \_\_\_\_\_

### XVIII. PUBLICITY

The entertainer Michael Jackson has been in the news a lot lately. At this point in time, how positive or negative is your opinion of him?

1 = Very positive

2 = Somewhat positive

3 = Somewhat negative

4 = Very negative

5 = Neutral

178. Do you know, or have you read, seen, or heard ANYTHING about the current criminal charges against Michael Jackson?

\_\_\_\_\_ Yes \_\_\_\_\_ No

IF YES:

a. What have you read, seen or heard about this case?

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b. How much news have you read or watched about the current Michael Jackson case?

\_\_\_\_\_ A lot \_\_\_\_\_ A little \_\_\_\_\_ None

c. How frequently have you discussed this case with friends, co-workers, or family members?

\_\_\_\_\_ A lot \_\_\_\_\_ A little \_\_\_\_\_ None

d. Where you have heard something about this case:

TV: \_\_\_\_\_ Which Stations: \_\_\_\_\_

Radio News: \_\_\_\_\_ Which Stations: \_\_\_\_\_

Radio Talk Shows: \_\_\_\_\_ Which Ones: \_\_\_\_\_

Newspaper: \_\_\_\_\_

Which Ones: \_\_\_\_\_

Magazines: \_\_\_\_\_

Which Ones: \_\_\_\_\_

Internet Chat Rooms: \_\_\_\_\_

Which Ones: \_\_\_\_\_

Conversations with others: \_\_\_\_\_

Who: \_\_\_\_\_

Other: \_\_\_\_\_

Who: \_\_\_\_\_

179. If you have been exposed to pre-trial publicity about this case, have you formed any preliminary opinions about this case? \_\_\_\_ Yes \_\_\_\_ No

If yes, please explain what they are.

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180. Please indicate which of the following statements best describes your feelings about the media's coverage of the Michael Jackson case. (Circle only one number.)

1 = The media is very biased against Michael Jackson.

2 = The media is somewhat biased against Michael Jackson.

3 = The media is not biased one way or the other in the Michael Jackson case.

4 = The media is somewhat biased in favor of Michael Jackson.

5 = The media is very biased in favor of Michael Jackson.

181. Do you have any strong opinions about Michael Jackson?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Not sure

If yes, what opinions have you formed? \_\_\_\_\_

182. Do you believe you can be a completely fair and impartial juror in this case?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Not sure

183. Did you see the Bashir documentary or the "Living with Michael Jackson" television program?

\_\_\_\_\_ Yes \_\_\_\_\_ No

184. Do you know, or have you read, seen, or heard ANYTHING about the publicity regarding the 1993-1994 investigation against Michael Jackson?

\_\_\_\_\_ Yes \_\_\_\_\_ No

IF YES:

a. What have you read, seen or heard about this investigation?

\_\_\_\_\_

b. How does your knowledge about this investigation affect your opinions about Michael Jackson?

\_\_\_\_\_

185. What is your opinion about jurors appearing on talk shows after serving on a high profile trial?

\_\_\_\_\_

186. What is your opinion about jurors writing a book about his or her experience as a juror in a high profile trial?

\_\_\_\_\_

187. How do you feel about serving on a jury in a case that will receive a tremendous amount of publicity?

\_\_\_\_\_

188. If you are selected as a juror in this case, will you be able to follow the court's instruction to avoid any news coverage about this case beginning today?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Not sure

XIX. FAMILIARITY WITH THE PARTICIPANTS

189. Do you know or recognize any of the prosecutors, the defense attorneys, the judge or any other court personnel involved in this case?

☐ Yes ☐ No

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

190. Do you have any opinions or knowledge of district attorney Tom Sneddon?

☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_

\_\_\_\_\_

191. Do you have any opinions or knowledge of deputy district attorney Gerald Franklin?

☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_

\_\_\_\_\_

192. Do you have any opinions or knowledge of deputy district attorney Ronald Zonen?

☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_

\_\_\_\_\_

193.. Do you have any opinions or knowledge of deputy district attorney Gordon Auchincloss?

☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_

\_\_\_\_\_

194 Do you have any opinions or knowledge of defense attorney Tom Mesereau?

☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_

\_\_\_\_\_

195. Do you have any opinions or knowledge of defense attorney Robert Sanger?

☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

196. Do you have any opinions or knowledge of defense attorney Brian Oxman?

☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_

197. Do you have any opinions or knowledge of defense attorney Susan Yu?

☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_

198. Do you know personally, or are you acquainted with any of the witnesses in this case?  
The potential witnesses in this case are attached at the back of the questionnaire.



XX. FAMILIARITY WITH THE DEFENDANT, MICHAEL JACKSON

199. Do you or any of your family members or close friends know Michael Jackson?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

200. Have you ever seen Michael Jackson in person? \_\_\_\_\_ Yes \_\_\_\_\_ No

If YES, please explain: \_\_\_\_\_

\_\_\_\_\_

201. Have you ever known anyone who has met Michael Jackson or spent any time at Neverland?

\_\_\_\_\_ Yes \_\_\_\_\_ No

202. Have you heard Michael Jackson's music?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If YES:

a. What are your opinions about his music? \_\_\_\_\_

\_\_\_\_\_

b. Have you ever purchased one of his albums? \_\_\_\_\_ Yes \_\_\_\_\_ No

203. What are your feelings about Michael Jackson as an artist?

\_\_\_\_\_

204. Have you ever seen Michael Jackson in any form of media, whether film, video, movies or television? \_\_\_\_\_ Yes \_\_\_\_\_ No

If YES, please explain where you saw him and what you recall about it:

\_\_\_\_\_

\_\_\_\_\_

205. Michael Jackson has a number of siblings with careers in the entertainment industry as well. Are you familiar with the music, television or motion picture appearances, or careers of: Janet Jackson, Latoya Jackson, Marlon Jackson, Jackie Jackson, Jermaine Jackson or Tito Jackson?

Yes [ ] No [ ]

If yes please explain:

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a) What impressions have you formed about them?

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206. Have you or anyone you know ever been employed by Michael Jackson or done business with Michael Jackson or any of his enterprises?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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207. Have you or anyone you know ever been employed at Neverland?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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208. Do you consider yourself a fan of Michael Jackson in any way?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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---

209.. Did you consider yourself a Michael Jackson fan in the past?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

210.. Were you ever a fan of the Jackson Five?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

211.. Is anyone in your household a Michael Jackson fan?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

212.. In the past two years, have you or anyone in your household listened to any Michael Jackson recordings or watched any of his DVDs or music videos?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

213. Have you or anyone in your household purchased "Michael Jackson: The Ultimate Collection" Box Set?

Yes \_\_\_\_\_ No \_\_\_\_\_

214. Have you or anyone in your household ever purchased a Michael Jackson collectible, such as a poster, t-shirt, doll, mask or glove?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

215. Have you ever visited a website, blog or chatroom concerning Michael Jackson?

Yes \_\_\_\_\_ No \_\_\_\_\_

216.. If yes to #216, how often would you say you have visited a Michael Jackson website, blog or chatroom?

\_\_\_\_\_ 1 to 3 times

\_\_\_\_\_ 4 to 6 times

\_\_\_\_\_ 7 to 10 times

\_\_\_\_\_ More than 10 times

\_\_\_\_\_ Don't know

217.. Have you ever visited any of these websites? (Check any that you have visited)

\_\_\_\_\_ Michaeljackson.com

\_\_\_\_\_ Mjjsource.com

\_\_\_\_\_ Aboutmichaeljackson.com

\_\_\_\_\_ Mjnewsonline.com

\_\_\_\_\_ Allmichaeljackson.com

\_\_\_\_\_ Other Michael Jackson related website (specify \_\_\_\_\_)

218.. Do you know anyone who has visited Neverland?

Yes \_\_\_\_\_ No \_\_\_\_\_

219. Have you ever heard any stories about Michael Jackson or know anything about him that makes you feel sympathetic toward him?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

220. *If you were chosen as a juror in this case, the court would instruct you not to consider the punishment Michael Jackson might receive. However, might it be of concern to you during deliberations?*

Yes \_\_\_\_\_ No \_\_\_\_\_

*If yes, please explain:* \_\_\_\_\_

221. *Do you accept the proposition that the question of punishment, if any, is for the Court alone to decide and that the possible punishment, if any, must not enter into your deliberations as to whether the defendant in this case is guilty or not guilty?*

Yes \_\_\_\_\_ No \_\_\_\_\_ Don't know \_\_\_\_\_

*If "no" or "don't know," please explain:* \_\_\_\_\_

222. *Do you accept the proposition of law that sympathy must not enter into the deliberations of the jurors as to guilt or non-guilt of the defendant, and that only the evidence produced in Court during the trial may be used by you to determine the guilt or non-guilt of the individual – Michael Jackson—who will be tried?*

Yes \_\_\_\_\_ No \_\_\_\_\_ Don't know \_\_\_\_\_

*If "no" or "don't know," please explain:* \_\_\_\_\_

## XXI. ABILITY TO BE FAIR

223. Have you formed or expressed any opinions about the guilt or innocence of the defendant, Michael Jackson?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Please explain: \_\_\_\_\_

224. Has anyone expressed to you their opinion as to the guilt or innocence of the defendant?

\_\_\_\_\_ Yes \_\_\_\_\_ No



225. The jurors that sit on this case will be instructed that they must base their decision entirely on the evidence produced in court, not from any outside source or pre-existing opinion or attitudes. Can you do that, despite what you have read, heard, or seen about this case? ☐ Yes ☐ No ☐ Not sure

Please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

226. Everyone has biases, prejudices or preconceived notions. Do you have any that would affect how you evaluate the evidence in this case? ☐ Yes ☐ No

Please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

227. If you have already formed opinions about this case, can you set them aside and base your decision entirely on the evidence presented in this courtroom, even if it conflicts with what you have previously heard? ☐ Yes ☐ No

228. Despite anything you may have heard, read or seen about this case, can you still be fair to the prosecution and the defense? ☐ Yes ☐ No

229. If, after hearing all the evidence, you believe the defendant's guilt has not been proven beyond a reasonable doubt, would you be able to face the boy and the boy's family, and announce a not guilty verdict? ☐ Yes ☐ No

Please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## XXII. CONCLUSION

230. Do you have any religious or other beliefs that might conflict with the duties of a juror? ☐ Yes ☐ No

If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

231. Do you have any religious or other beliefs that would make it difficult for you to sit in judgment of another person?

Yes [ ] No [ ]

If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

232. Do you have specific health, hearing, or vision problems of a serious nature that might make it difficult for you to sit as a juror on this case?

☐ Yes ☐ No

233. Is there any reason you would not be a fair juror in this case? ☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_  
\_\_\_\_\_

234. Is there anything else that you feel the court should know about your qualifications as a juror? ☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_  
\_\_\_\_\_

235. As a result of you filling out this questionnaire, have you now formed an opinion about this case? ☐ Yes ☐ No

If "YES," please explain: \_\_\_\_\_  
\_\_\_\_\_

236. Now that you have answered all of these questions, are you willing to serve as a juror on this case? ☐ Yes ☐ No

Please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I declare under penalty of perjury that the answers set forth on this Jury Questionnaire are true and correct to the best of my knowledge, information, and belief.

Executed on \_\_\_\_\_, 2005, in Santa Barbara County, California.

\_\_\_\_\_  
Prospective Juror Signature

If you feel that in the spaces provided, you were unable to sufficiently answer any particular question, please use this area to provide that information. Thank you very much for your

mjfacts.com

[Signature]

## PROOF OF SERVICE

I, the undersigned declare:

I am over the age of 18 years and not a party to the within action. I am employed in the County of Santa Barbara. My business address is 233 East Carrillo Street, Suite C, Santa Barbara, California, 93101.

On January 11, 2005, I served the foregoing documents on the interested parties in this action by depositing a true copy thereof as follows: **JOINT SUBMISSION OF JURY QUESTIONNAIRE**

Tom Sneddon  
Gerald Franklin  
Ron Zonen  
Gordon Auchincloss  
District Attorney  
1112 Santa Barbara Street  
Santa Barbara, CA 93101  
805-568-2398

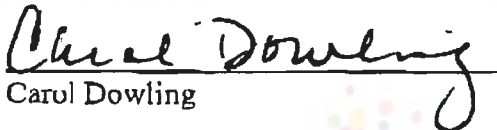
— **BY U.S. MAIL** - I am readily familiar with the firm's practice for collection of mail and processing of correspondence for mailing with the United States Postal Service. Such correspondence is deposited daily with the United States Postal Service in a sealed envelope with postage thereon fully prepaid and deposited during the ordinary course of business. Service made pursuant to this paragraph, upon motion of a party, shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit.

— **BY FACSIMILE** - I caused the above-referenced document(s) to be transmitted via facsimile to the interested parties

**X** **BY HAND** - I caused the document to be hand delivered to the interested parties at the address above.

**X** **STATE** - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed January 11, 2005, at Santa Barbara, California.

  
Carol Dowling