

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	
	)	<b>Case No. 1:18-cr-83</b>
<b>PAUL J. MANAFORT, JR.,</b>	)	
<b>Defendant.</b>	)	
	)	
	)	

**ORDER**

The parties previously requested that the Court issue a jury questionnaire to all potential jurors. Although the request was initially denied, the Court, upon reconsideration, has decided to provide a jury questionnaire for all potential jurors for them to complete before the Court conducts further *voir dire* in the courtroom.<sup>1</sup> A proposed jury questionnaire is attached to this Order and should be reviewed carefully by the parties. It is contemplated that the Court will convene the panel of prospective jurors on Tuesday, July 24, 2018 at 9:00 a.m. so that they may complete the questionnaire one day in advance of jury selection.

In this regard,


It is hereby **ORDERED** that the parties shall have until **Monday, July 16, 2018 at noon** to propose any changes to the Court's proposed jury questionnaire. Any oral argument on the jury questionnaire will be heard on Tuesday, July 17, 2018 at 1:00 p.m.

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<sup>1</sup> Further voir dire will include, for example, identification of the parties, attorneys, and witnesses, as well as follow up questioning relating to answers provided in the questionnaire.

The Clerk is directed to provide a copy of this Order to all counsel of record.

Alexandria, Virginia  
July 11, 2018



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**T. S. Ellis, III**  
**United States District Judge**

## **JURY QUESTIONNAIRE**

### **Instructions for Jury Questionnaire**

This questionnaire is designed to obtain information about your background as it may relate to your service as a juror in this case. The questionnaire's use is intended 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. The information you provide in response to this questionnaire will be kept confidential.

Please write your assigned juror number at the top of each page. Respond to each and every question. Your candor and honesty is necessary and 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. You are further instructed not to conduct any research of any kind about this case or the participants in this case, nor are you permitted to obtain information about this case or its participants from any outside sources of any kind whatsoever.**

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.

You will be asked further questions by the judge in the courtroom.

**PLEASE PRINT LEGIBLY**

Juror Number: \_\_\_\_\_

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

2. Sex: \_\_\_\_\_

3. Date of Birth: \_\_\_\_\_

4. Place of Birth: \_\_\_\_\_

5. Address: \_\_\_\_\_

6. 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? \_\_\_\_\_

7. Please describe other responsibilities that you have which may include childcare, eldercare, school, etc.)

\_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

9. Is your spouse or companion who lives with you employed? And if so, by whom?

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

Spouse's Employer: \_\_\_\_\_

Juror Number: \_\_\_\_\_

10. Describe the highest level of education you have completed.

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11. Are you presently a student? And is so, where?

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

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

A. If yes, please explain the degree of difficulty: \_\_\_\_\_

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13. Have you, or has any member of your family or close friend or relative, ever been accused of, arrested for, or charged with a crime?

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

A. If yes, please state who was accused of, arrested, or charged with a crime and their relationship to you and also provide a brief description of the alleged crime(s):

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Juror Number: \_\_\_\_\_

B. If yes, do you feel that you, your family member, close friend, or relative were/was treated fairly by the criminal justice system?

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14. 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, do you feel that you, your family member, close friend, or relative were/was treated fairly by the Internal Revenue Service?

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15. 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?

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Juror Number: \_\_\_\_\_

16. 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, please circle what best describes the case on which you served as a juror:

Criminal Case   OR   Civil Case

Jury Reached a Verdict   OR   Jury Did Not Reach a Verdict

If you served as a juror on multiple cases you can provide descriptions of those additional cases below:

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

17. 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. If yes, was the grand jury on which you served able to reach agreement on the issuance of true bills?

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

18. 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

Juror Number: \_\_\_\_\_

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

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B. Would the law enforcement employment that you described question 18(A) 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?

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19. 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:

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B. If yes, would the employment that you described in the previous question 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?

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Juror Number: \_\_\_\_\_

20. Have you, or any members 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:

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B. If yes, would the employment that you described when answering question 20(A) 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?

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21. Have you, or any member of your immediate family, ever worked as an employee of a bank or financial institution?

\_\_\_\_\_ 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:

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Juror Number: \_\_\_\_\_

B. If yes, would the employment that you described when answering question 21(A) 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?

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

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

A. If yes, please explain:

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B. If yes, would the legal employment that you described when answering question 22(A) prevent or hinder you in any way from rendering a fair and impartial verdict in this case solely on the evidence presented and the Court's instructions on the law:

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23. Have you ever applied to finance or re-finance real property?

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

Juror Number: \_\_\_\_\_

A. Is there anything about the process of applying for financing or re-financing that you found remarkable? If so, please describe:

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24. 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 describe (i) what you have seen, read, or heard, (ii) the source of that information, and (iii) when that occurred:

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B. If yes, has the news coverage or other information you have seen, read, or heard about this case caused you to form an opinion about the defendant or defendant's guilt or innocence in this case?

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

C. If yes, please explain:

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Juror Number: \_\_\_\_\_

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

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25. The government may produce evidence in this case that the defendant had business ties to foreign governments and leaders – specifically the Ukraine and the Ukrainian President. Having ties to a foreign government or leader is, of course, in and of itself, not a crime. But knowing this information would you nonetheless find it difficult to decide the case fairly and impartially based solely on the evidence presented and the Court’s instructions on the law?

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

A. If yes, please explain:

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26. Do you suffer from any physical or mental condition(s) that would affect your ability to pay close and careful attention to the evidence and to render an impartial verdict?

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

A. If yes, please explain:

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27. This trial may last for 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 preclude you from serving on this jury? A truly exigent

Juror Number: \_\_\_\_\_

circumstance includes, but not limited to, having prepaid travel arrangements or serving as the sole caregiver to a child, elderly, or disabled person? (Note: General concerns about missing work or social obligations are not justifications for being excused from jury service.)

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

A. If yes, please explain:

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

**AFFIRMATION:**

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.

Executed in the Eastern District of Virginia, on this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Signature