

**STATE OF OREGON VS. JEREMY JOSEPH CHRISTIAN
MULTNOMAH CASE NO. 17-CR-34550**

CONFIDENTIAL JUROR QUESTIONNAIRE

**Your full name as it appears on
your jury summons (printed):**

Jury number from summons:

Juror Email:

Preferred Telephone Number:

Alternate Phone Number:

Work Number:

JUROR QUESTIONNAIRE

This questionnaire is designed to assist the judge and lawyers in the jury selection process. It is a private court document that is to be used only for that purpose. The information will not be disclosed to any unauthorized person. Please answer the questions completely and honestly. You are providing this information under oath.

NOTE: My staff needs a record of your telephone number in case it is necessary to contact you personally or to leave a message for your family or employer. To protect your privacy, this page will be separated from the rest of the questionnaire. Your telephone number will not be made available to anyone other than my court staff.

INSTRUCTIONS:

1. Fill out the information requested below and then answer each question.
2. If you do not understand a question, write "do not understand."
3. If you do not know the answer, write "don't know."
4. Do not discuss the questions or your answers with anyone else, including other jurors.
5. The staff are not permitted to answer your questions about the questionnaire.
6. Please write your juror badge number on the lower right hand corner of every page.

Thank you for your cooperation.

DATED: _____

Cheryl A. Albrecht
Circuit Court Judge

Jury number from summons	(For staff use only) Questionnaire number
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Your full name as it appears on your jury summons (Please print clearly)

INTRODUCTION

You have been selected as a prospective juror in a case involving charges of murder in the first degree and attempted murder in the first degree among other charges. The defendant, JEREMY JOSEPH CHRISTIAN is accused of intentionally killing RICKY BEST and TALIESIN NAMKAI-MECHE in the course of the same criminal episode and attempting to kill MICAH FLETCHER in the course of the same criminal episode, all alleged to have occurred on May 26, 2017, aboard a MAX train at the Hollywood Transit Station in Portland, Oregon.

Some of the questions in this questionnaire may involve topics or issues that you do not feel comfortable discussing in a large group. If you feel that way about any particular question(s), you may write “confidential” next to the question(s), or may alert the court during the jury selection process, and the matter can be discussed separately from the group with the judge and lawyers.

Because this questionnaire is part of the jury selection process, you must swear that the answers you give are true to the best of your knowledge, and you must fill out the questionnaire by yourself.

SECTION I - PERSONAL AND FAMILY INFORMATION

1. A. Your Name: _____
 Last First Middle
- B. Have you ever been known by any other name? [] Yes [] No
- If yes, please list other names used: _____

2. A. Age: _____
- B. Gender: _____ Do you have a preferred gender pronoun? _____
- C. Marital Status: _____ Single _____ Married _____ Separated _____ Widowed

3. Do you have any children? _____ Yes _____ No. If yes, please list below:

<u>Child's Age</u>	<u>Occupation</u>
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4. Do you have any difficulty understanding, reading or writing English? [] Yes [] No

5. We expect the trial to begin on January 21, 2020, and last until February 28, 2020. We understand that a multi-week obligation will create some hardships for almost all potential jurors. With that in mind, do you have any extraordinary personal, employment or family activities or obligations which would make it extremely difficult to take that much time away from your responsibilities, or which might seriously affect your concentration as a juror? (If there is not enough space below, there is additional space at the end of the questionnaire to discuss significant hardship(s).)

[] Yes [] No

If yes, please explain: _____

6. Do you have any health problems, health concerns, or are you taking any medication that would make it difficult for you to serve as a juror or to concentrate on the case? Yes No
If yes, please explain: _____

7. Is there anyone in your family with a medical condition that will require your attention during the next several weeks? Yes No
If yes, please explain: _____

8. Have you ever suffered from chronic short or long term memory loss? Yes No

9. Have you ever suffered a traumatic brain injury? Yes No

10. Have you ever sought the services of a mental health professional that you believe would impair your ability to serve as a juror? Yes No
If you answered yes, questions 8, 9, or 10, please briefly explain: _____

11. Do you have any concerns that might affect your concentration or ability to serve if you were a juror in this case? (e.g. family, financial, etc.) Yes No
If yes, please explain: _____

12. Have you been convicted of a felony or served a felony sentence within the last 15 years? Yes No

13. Have you been convicted of a misdemeanor involving violence or dishonesty or served a sentence for such a crime within the last 5 years? Yes No

A. If you answered yes to questions 12 or 13, please provide details including the location, approximate date and name of the crime: _____

14. Do you smoke? Yes No

A. There is no smoking in the jury room and smoking breaks are not allowed except for the noon lunch break. Will that affect your ability to serve as a juror in this case?
 Don't know Yes No

15. Do you want to be a juror in this case? _____
 Why or why not? _____
16. What are the characteristics of a good juror? _____
17. If selected, would you be a good juror? Yes No
 Why or why not? _____
18. Have you ever used or had personal contact or experiences with a person who has used illegal drugs? Yes No
 If yes, please explain: _____

19. Have you, a member of your family, or close acquaintance ever had a drug or alcohol addiction or received treatment? Yes No
 If yes, please explain: _____

SECTION II - RESIDENCE INFORMATION

20. How long have you resided in Oregon? _____
21. How long have you resided in Multnomah County? _____
22. What is your place of birth? _____
23. In what area or neighborhood of Multnomah County do you currently reside? _____

24. How long have you lived in your current residence? _____
25. With whom do you live? (Check all that may apply).
 Spouse/partner Roommate(s) Child(ren) Parent(s)
 Friend(s) Alone

SECTION III - OCCUPATIONAL INFORMATION

26. Who is your current employer? (If self-employed, please specify.)
 Employer: _____
 How Long: _____

A. If employed, what is the nature of your employment, including job title and general duties?

27. Are you currently: Retired or Unemployed
Please list most recent previous employment: _____

28. Do or did you have supervisory responsibilities? Yes No
If yes, please explain: _____

29. Do you have any projects in progress at your job which might affect your ability to concentrate if you were to serve as a juror in this case? Yes No
If yes, please explain: _____

30. Was any special education, certification or training required to qualify for the job you currently hold, or for your most recent job if you are now retired or unemployed? Yes No
If yes, please specify: _____

31. Have you, or any member of your family, ever been employed by, voluntarily served with, or applied to: (Check all that may apply.)

- _____ Federal law enforcement agencies (FBI, ATF, DEA, Secret Service, DHS, ICE, etc.)
- _____ State, County or City law enforcement agencies (sheriff, city police department, highway patrol, game enforcement, etc.)
- _____ Any prison or jail
- _____ Any probation / parole department
- _____ Security guard service
- _____ Department of Justice
- _____ Department of the Treasury
- _____ Private investigation agency
- _____ U.S. Customs Service
- _____ Any foreign consulate or embassy
- _____ Any prosecutor's office, state or federal
- _____ Any attorney general's office
- _____ Any court, state or federal
- _____ Any defense attorney (public or private)
- _____ American Civil Liberties Union

If you have checked any category above regarding a family member, please identify the person(s), their relationship to you and the circumstances: _____

Please explain anything about the above employment or volunteer experience that you believe would affect your ability to act as an impartial juror in this matter: _____

32. How are/were your parents employed?
Father(s): _____
Mother(s): _____

SECTION IV - MILITARY HISTORY

33. Have you ever been in any military service (active duty, reserves, National Guard, or academy) of the United States of America or any foreign country? Yes No
34. If you answered yes to question 39, please answer the following:
A. In what branch did you serve? _____
B. Dates of active duty service: From: _____
To: _____
C. Highest rank held: _____
D. Honorably discharged? Yes No
35. Has your spouse/partner or significant other ever been in any military service (active duty, reserves, National Guard, or academy) of the United States of America or any foreign country? Yes No

SECTION V - FORMAL EDUCATION BACKGROUND

36. What is the highest grade or degree in school that you completed?
Grade/degree: _____ Year completed: _____
What was your major area(s) of study? _____
37. Which schools(s) did you attend?
A. High school(s): _____
B. College(s): _____
C. Other (please specify): _____
38. Are you currently enrolled in, or do you plan to attend any school in the near future? Yes No
If yes, please describe: _____

39. Have you or any relatives or close friends had any education or training in the law, or any employment that required you to know anything about the law or law enforcement? Yes No

If yes, please explain: _____

40. What is the highest grade or degree that your spouse/partner or significant other (former spouse/partner if divorced or widowed), completed?

Grade/degree: _____ Year completed: _____
What was their major area(s) of study? _____

41. What is the highest grade or degree that your parents completed?

Father(s): Grade/degree: _____ Year completed: _____
Mother(s): Grade/degree: _____ Year completed: _____

42. Have you, a spouse/partner or someone else living in your household, ever had training in:

A. Psychology, Psychiatry or Counseling Yes No
If yes, please describe: _____

B. Religion/Theology Yes No
If yes, please describe: _____

SECTION VI - ORGANIZATIONAL/GROUP AFFILIATIONS

43. List any organizations or groups of any kind which you have at any time been a member, been associated with, or donated money to:

Current: _____

Past: _____

44. Do you consider yourself politically active? Yes No
If yes, please explain: _____

45. Do you consider yourself to be Liberal Moderate Conservative?

46. Have you ever run for political office? Yes No
If yes, please explain: _____

47. Are you registered to vote? Yes No

SECTION VII - PREVIOUS JURY EXPERIENCE

48. Have you ever served as a juror or grand juror in any court?
(Include any prior experience as an alternate juror as well.)

A. Criminal case(s) jury trial: Yes No

If yes:

1. When & where? _____

2. Charges: _____

3. Without telling us the verdict, was a verdict reached in all the cases that you participated in as a juror? Yes No

4. Were you the presiding juror? Yes No

B. Civil case(s) jury trial: Yes No

If yes:

1. When & where? _____

2. Type of case: _____

3. Without telling us the verdict, was a verdict reached in all the cases that you participated in as a juror? Yes No

4. Were you the presiding juror? Yes No

C. Grand Jury: Yes No

If yes:

1. When & where? _____

2. Were you the foreperson? Yes No

49. Was there anything about your prior jury experience that made it a good or bad experience for you? Yes No

If yes, please explain: _____

50. Do you have any particularly positive or negative opinions about the jury system? Yes No

Please explain your answer in the space below: _____

51. If the judge gives you an instruction about the law that is different from a belief or opinion that you hold, how will you deal with that conflict? _____

52. Are you acquainted with any person who is currently on call for jury duty for this case or who you saw report for jury duty with you today? Yes No Possibly
Please explain: _____

SECTION VIII - PRIOR EXPERIENCES WITH LAW ENFORCEMENT AND COURT PERSONNEL

53. Have you had a particular experience with law enforcement, good or bad, which stands out in your mind? Yes No
If yes, please provide details: _____

54. What are the most prevalent causes of crime in our community? _____

55. What are your thoughts about how negative or positive childhood experiences affect development? _____

56. Are there any types of crimes which are not properly punished by the criminal justice system? Yes No
If yes, please explain: _____

Please indicate the strength of your agreement or disagreement, and write any relevant comment or explanation:

57. If a person is arrested and charged with a crime, that person is guilty.
_____ Strongly Agree _____
_____ Agree _____
_____ No Opinion _____
_____ Disagree _____
_____ Strongly Disagree _____

58. Chances are very good that a criminal will be able to find a loophole in the legal system in order to avoid a conviction or punishment.
_____ Strongly Agree _____
_____ Agree _____
_____ No Opinion _____
_____ Disagree _____
_____ Strongly Disagree _____

59. It is unfair for the State to have to prove its case beyond a reasonable doubt.
 Strongly Agree _____
 Agree _____
 No Opinion _____
 Disagree _____
 Strongly Disagree _____

60. A criminal defendant should be required to produce evidence that they are innocent.
 Strongly Agree _____
 Agree _____
 No Opinion _____
 Disagree _____
 Strongly Disagree _____

61. If a person is charged with a crime and is innocent they should testify.
 Strongly Agree _____
 Agree _____
 No Opinion _____
 Disagree _____
 Strongly Disagree _____

62. Generally, the law goes too far in protecting the rights of the criminal defendant.
 Strongly Agree _____
 Agree _____
 No Opinion _____
 Disagree _____
 Strongly Disagree _____

63. People may get convicted of crimes they did not commit.
 Strongly Agree _____
 Agree _____
 No Opinion _____
 Disagree _____
 Strongly Disagree _____

64. Have you ever been held in or ever visited a jail, prison, or any other place of incarceration, either for juveniles or adults? Yes No
If yes, please give details of your experience (including the location of the prison) and your reaction to it: _____

65. Have you, any member of your family, or any close acquaintance ever been arrested or charged with a crime? Yes No

If yes, please explain: _____

66. Have you ever been a witness in a court proceeding or subpoenaed to be a witness? Yes No

If yes, please explain when and the circumstances of your testimony: _____

67. Have you ever been a party to a lawsuit? Yes No

If yes, please explain: _____

68. Have you ever called the police or filed a police report? Yes No

If yes, please explain: _____

Was the case prosecuted? Yes No

69. Do you know any lawyers, district attorneys or judges? Yes No

If yes, please identify and describe your relationship with each of those individuals:

70. Have you or any of your friends or relatives been the victim of a crime (reported or unreported)? Yes No

A. If yes, please provide details, including location and approximate date:

B. If yes, do you feel that this will impact your ability to be impartial in this case? Yes No

71. Have you ever been an eyewitness to a crime? Yes No

If yes, please provide details, including location and approximate date:

72. Have you had to take action to defend yourself or another from an attack? Yes No

If yes, please describe the circumstances: _____

73. What is the first thing that comes to mind when you think of criminal defense attorneys?

74. What is the first thing that comes to mind when you think of prosecutors? _____

75. To your knowledge, is there any matter pending in the office of any District Attorney that involves or affects you? Yes No
If yes, please explain: _____

76. Have you or anyone you know had any good or bad experiences with any prosecuting agency, including the Multnomah County District Attorney's Office? Yes No

77. Have you or anyone you know had any good or bad experiences with any criminal defense attorney(s)? Yes No
Please explain any "yes" answers to questions 102 or 103: _____

SECTION IX - PERSONAL ATTITUDES, EXPERIENCES, INTERESTS AND ACTIVITIES

78. Do you use public transportation? Yes No
If yes, please circle all that apply: Bus MAX Train Other

79. How many days a week do you use public transportation? _____

80. If you are familiar with public transportation, how would you describe the best and worst things about it?
Best: _____

Worst: _____

81. Have you ever ridden a MAX Train in the past? Yes No

82. Have you ever had concerns about your personal safety while using public transportation? Yes No
If yes, please explain: _____

83. Have you ever been a victim of a crime or witnessed a crime while using public transportation? Yes No
If yes, please explain: _____

84. Are you familiar with the term "White Nationalism"? Yes No
If yes, what does the term mean to you? _____

85. Are you concerned about bias crimes in Oregon? Yes No

86. Do you think existing laws are adequate in addressing bias crimes? Yes No

87. Have you or someone close to you ever been the victim of a bias crime?
 Yes No
If yes, please explain: _____

88. Describe your understanding of your constitutional right to free speech: _____

89. Is your freedom of speech important to you? Yes No
Why or why not? _____

90. Have you ever participated in a "free speech rally"? Yes No
If yes, please describe: _____

91. Has anyone ever interfered with your freedom of speech? Yes No
If yes, please explain: _____

92. Have you ever seen a person interfere with another person's freedom of speech? Yes No
If yes, please describe: _____

93. Have you ever interfered with the free speech of others? Yes No
If yes, please describe: _____

94. Do you have an opinion about groups such as Antifa or Patriot Prayer? Yes No
Please explain: _____

95. Please name three people, living or dead, whom you admire greatly: _____

96. Please name three people, living or dead, whom you hold in low esteem: _____

97. Please list the accomplishments in your life of which you are the most proud of: _____

98. What bumper stickers or signage do you and/or your family members have on your vehicles?

99. What are your hobbies and interests? _____

100. Do you regularly read books? Yes No
If yes, what types? _____

101. What were the last three books that you read? _____

102. Do you keep up on current events? _____

103. What are your news sources? _____

104. What periodicals, magazines or publications do you read regularly? _____

105. Do you watch television? What are your favorite three programs? _____

106. What news broadcasts do you watch or listen to? _____

107. What websites, or types of websites, do you visit regularly? _____

108. Do you regularly read internet blogs? If so, which? _____

109. Do you maintain a blog site? If so, which? _____

110. Have you ever written a letter to the editor? If so, what about? _____

111. Do you use any of the following?

Computer	<input type="checkbox"/> Yes	<input type="checkbox"/> No	How often? _____
Smart Phone	<input type="checkbox"/> Yes	<input type="checkbox"/> No	How often? _____
Facebook	<input type="checkbox"/> Yes	<input type="checkbox"/> No	How often? _____
Twitter	<input type="checkbox"/> Yes	<input type="checkbox"/> No	How often? _____
Snapchat	<input type="checkbox"/> Yes	<input type="checkbox"/> No	How often? _____
Instagram	<input type="checkbox"/> Yes	<input type="checkbox"/> No	How often? _____
LinkedIn	<input type="checkbox"/> Yes	<input type="checkbox"/> No	How often? _____

Other: _____

112. What "true crime" shows, podcasts, books, or movies are you familiar with and what is your impression of them? _____

113. Have you ever had any problems with others due to a difference in racial, ethnic, or cultural backgrounds? Yes No
If yes, please describe the circumstances: _____

114. Do you hold any religious beliefs that will impact your ability to be fair and impartial in this case? Yes No
If yes, please explain: _____

115. Have you, your spouse/partner, a relative or a close friend ever been associated in any manner with a group or organization which advocates change in the criminal laws or law enforcement practices for any state or for the United States? Yes No
If yes, please explain: _____

116. Have you, your spouse/partner, a relative or a close friend ever been associated with any program dedicated to rehabilitating persons convicted of crimes? Yes No
If yes, please explain: _____

117. What are your thoughts generally about the psychological or psychiatric professions?

118. Do you have any special interest, knowledge, or experience in any of the following areas?

Psychology or Mental Health	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sociology or Social Work	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Counseling	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Law	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Administration of Justice	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Criminology or Forensics	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Police Training	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Use of Firearms	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If you answered "yes" to any of the above, please explain: _____

119. Would it be difficult or impossible for you to listen to and look at emotionally powerful evidence, including graphic photographic evidence? Yes No

If yes, please explain: _____

120. Is there anything about your opinions of the law that would impair your ability to render a fair and impartial verdict for either the State or the defendant? Yes No

If yes, explain: _____

SECTION X – PUBLICITY

In this case, Jeremy Joseph Christian is charged with murder in the first degree for an incident on May 26, 2017, where Ricky Best and Taliesin Namkai-Meche were killed. He is also charged with attempted murder in the first degree for an incident involving Micah Fletcher on May 26, 2017.

The incident is alleged to have occurred aboard a MAX Train at the Hollywood Transit Station in Portland, Oregon. Mr. Christian has entered a plea of "not guilty" to all charges.

121. Have you heard anything from any source about this case prior to coming to court today? Yes No

A. If so, from what source?

Internet Blog TV Social Media

Please list sources of information: _____

B. Please state what, if anything, you recall reading or hearing about this case, and when:

122. Based on anything you may have heard about this case, from any source, have you formed any opinion(s) about this case? Yes No

If yes, what opinion(s) have you formed? _____

123. Can you be impartial in this matter? Yes No

124. Can you follow the law as instructed by the court? Yes No

SECTION XI - CONCLUDING QUESTIONS

125. The defendant in this case is Jeremy Joseph Christian. His defense attorneys are Greg Scholl and Dean Smith. The State of Oregon is represented by Jeff Howes and Don Rees. Are you familiar with the defendant or any of the attorneys? Yes No

If yes, please explain: _____

126. Are you familiar with the trial judge, the Honorable Cheryl A. Albrecht? Yes No

If yes, please explain: _____

127. Do you have any personal beliefs that you did not state above that would make it difficult for you to sit on this case? Yes No

If yes, please explain: _____

128. If a member of your family were charged with a serious crime, would you want someone just like yourself as a juror on their case? Yes No

If yes, please explain: _____
