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STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

STATE OF MINNESOTA,

Plaintiff,

SPECIAL JUROR QUESTIONNAIRE

vs.

**TOU THAO,
J. ALEXANDER KUENG,**

Court File No. 27-CR-20-12949

Court File No. 27-CR-20-12953

Defendants.

Please answer all of the questions as completely and honestly as you can. You must answer all questions, but you may answer "PRIVATE" if disclosure of some of your past experiences would be particularly sensitive, traumatic, or embarrassing and the judge will address those questions in court as privately as possible.

As you answer these questions, please keep in mind that there are no "right" or "wrong" answers, but you are answering these questions under oath and YOU WILL BE REQUIRED TO VERIFY UNDER OATH THAT YOUR ANSWERS ARE TRUE WHEN YOU COME TO COURT FOR THE FIRST TIME.

An extra blank page is attached if you need additional room for answers

DO NOT WRITE ON THE BACK OF ANY PAGE. ATTACH EXTRA PAGES IF NECESSARY.

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PART I. KNOWLEDGE OF THE CASE

On May 25, 2020, George Floyd died after an interaction with Minneapolis Police. The charges in this case stem from that incident.

1. What do you know about this case from media reports?

IT IS IMPORTANT FOR THE PARTIES TO KNOW ALL OF THE DETAILS YOU REMEMBER ABOUT THESE EVENTS, THE CASE, GEORGE FLOYD, DEREK CHAUVIN, THOMAS LANE, AND DEFENDANTS TOU THAO AND J. ALEXANDER KUENG. PLEASE TAKE YOUR TIME TO SEARCH YOUR MEMORY AND PROVIDE A FULL ACCOUNT OF WHAT YOU RECALL FROM WHAT YOU HAVE HEARD OR SEEN IN THE MEDIA (INCLUDING WHETHER YOU WATCHED – AND, IF SO, HOW MUCH -- OF THE TRIAL OF DEREK CHAUVIN [WHICH TOOK PLACE IN MARCH-APRIL 2021]). THIS WILL HELP TO SHORTEN THE JURY SELECTION PROCESS.

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2. From what you have seen, read, or heard, do you have a general impression of the defendant Tou Thao?
- Very negative Somewhat negative Neutral Somewhat positive
 Very positive Other:
- Why do you feel that way?
3. From what you have seen, read, or heard, do you have a general impression of the defendant J. Alexander Kueng?
- Very negative Somewhat negative Neutral Somewhat positive
 Very positive Other:
- Why do you feel that way?
4. From what you have seen, read, or heard, do you have a general impression of Derek Chauvin (whose case will not be a part of this trial)?
- Very negative Somewhat negative Neutral Somewhat positive
 Very positive Other:
- Why do you feel that way?
5. From what you have seen, read, or heard, do you have a general impression of Thomas Lane (whose case will not be a part of this trial)?
- Very negative Somewhat negative Neutral Somewhat positive
 Very positive Other:
- Why do you feel that way?
6. From what you have seen, read, or heard, do you have a general impression of George Floyd?
- Very negative Somewhat negative Neutral Somewhat positive
 Very positive Other:
- Why do you feel that way?

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7. Do you, or someone close to you, have any direct or indirect connections to these events?

Yes No

If yes, please explain:

8. Have you ever watched video of George Floyd's death on the news or the Internet?

Yes No If yes, how many times have you seen videos from the incident, **in whole or in part**, on TV or on the Internet? 1 time 2-3 times 4-5 times 6 or more times

9. Have you ever talked about George Floyd's death with your family, friends, or co-workers, or discussed it online, for example, on social media? Yes No

If yes, what opinions have you expressed?

10. Did you, or someone close to you, participate in any of the demonstrations or marches against police brutality that took place in Minneapolis after George Floyd's death?

Yes, me Yes, someone close to me No

If you participated, explain how much you were involved.

11. If you participated, did you carry a sign? Yes No

What did it say?

12. Have you participated in rallies or demonstrations or marches regarding racial justice or civil rights generally? Yes No.

If you have participated, explain how much you were involved.

13. If you have participated, did you carry a sign? Yes No

What did it say?

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14. Did you or someone you know get injured or suffer any property damage during the protests that took place after George Floyd's death? Yes No
15. Do you believe your community has been negatively or positively affected by any of the protests that have taken place in the Twin-Cities area since George Floyd's death?
16. No matter what you have heard or seen about this case, and no matter what opinions you might have formed, can you put all of that aside and decide this case only on the evidence you receive in court, follow the law, and decide the case in a fair and impartial manner?

PART II. MEDIA HABITS

1. What is your primary source of news?
2. How often do you read a hard copy or online version of a newspaper? Every day Several times a week Once or twice a week Less often than once a week Never
3. What newspapers do you regularly read?
4. What podcasts do you regularly listen to?
5. How often do you listen to local news on the radio or watch news on television? Every day Several times a week Once or twice a week Less often than once a week Never
6. Which local radio or television news station do you listen to or watch most?

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7. How often do you see local news or news related updates on social media sites such as Facebook or Twitter? Every day Several times a week Once or twice a week
 Less often than once a week Never
8. What social media platforms do you use regularly, if any?

PART III. POLICE CONTACTS

1. The defendants in this case were officers for the Minneapolis Police Department. Is there anything about their employment with the MPD that would prevent you from rendering a fair and impartial verdict in this case?
2. Do you have regular contact with any law enforcement agencies, employees, or officers through your work, your neighborhood, or in your social life? Yes No
If "Yes," please explain:
3. Have you, or someone close to you, ever helped support or advocated in favor of or against police reform? Yes No
If "Yes," please explain:
4. Have you, or someone close to you, ever been arrested for a crime? Yes No
If yes, how did the police handle the arrest? They acted professionally They acted unprofessionally They were verbally abusive They used excessive force I don't know
5. Have you, or someone close to you, ever been the victim of a crime where the police were called? Yes No
If "Yes," please explain the circumstances:
6. Were you satisfied or unsatisfied with how the police responded?
 Very satisfied Somewhat satisfied Neutral Somewhat unsatisfied
 Very unsatisfied I don't know

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7. Have you ever personally seen the police use more force than was needed? Yes No

If "Yes," please explain:

8. Have you ever been restrained or put in a chokehold, for example, by law enforcement or during a self-defense class? Yes No If "Yes," please explain:

9. Please circle the choice that reflects your honest opinion:

	Strongly Agree	Somewhat Agree	No Opinion	Somewhat Disagree	Strongly Disagree
a Discrimination is not as bad as the media makes it out to be? Comments, if any:	1	2	3	4	5
b Blacks and other minorities do not receive equal treatment as whites in the criminal justice system. Comments, if any:	1	2	3	4	5
c Police in this country treat whites and blacks equally. Comments, if any:	1	2	3	4	5
d Police in my community make me feel safe. Comments, if any:	1	2	3	4	5
e I support defunding the Minneapolis Police Department. Comments, if any:	1	2	3	4	5

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| f | Minneapolis police officers are more likely to respond with force when confronting black suspects than when dealing with white suspects.
Comments, if any: | 1 | 2 | 3 | 4 | 5 |
| g | Because law enforcement officers have such dangerous jobs, it is not right to second guess decisions they make while on duty.
Comments, if any: | 1 | 2 | 3 | 4 | 5 |
| h | The criminal justice system is biased against racial and ethnic minorities.
Comments, if any: | 1 | 2 | 3 | 4 | 5 |
| i | I do not trust the police.
Comments, if any: | 1 | 2 | 3 | 4 | 5 |
| j | People today do not give our law enforcement officers the respect they deserve.
Comments, if any: | 1 | 2 | 3 | 4 | 5 |
| k | Local police departments try to cover up excessive force rather than correct it.
Comments, if any: | 1 | 2 | 3 | 4 | 5 |
| l | I think that news reports about police brutality against racial minorities is only the tip of the iceberg.
Comments, if any: | 1 | 2 | 3 | 4 | 5 |

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10. Have you ever been trained on how to restrain someone or use a chokehold? Yes No
11. Do you have any martial arts training or experience? Yes No
12. Other than what you have already described above, have you, or has anyone close to you, participated in protests about police use of force or police brutality? Yes No
13. How favorable or unfavorable are you about Black Lives Matter? Very favorable
 Somewhat favorable Neutral Somewhat unfavorable Very unfavorable.
 Please explain your choice:
14. How favorable or unfavorable are you about "Back the Blue" or Blue Lives Matter?
 Very favorable Somewhat favorable Neutral Somewhat unfavorable
 Very unfavorable. Please explain your choice:

PART IV. PERSONAL BACKGROUND

1. Age\Gender?
2. Highest level of education you have completed (list any degrees and areas of study for any education beyond high school)?
3. Your Work Status (Full-time, Part-Time, Self-employed, Disabled, Student, Retired, *etc.*) and your occupation\employer?
4. List your previous five positions or occupations (only if within last 10 years)?
5. What city do you live in and how long have you lived there?

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12. Do you, or does anyone close to you, have any training or experience (work or volunteer) in the following areas?

	No	Yes	Please Provide Limited Details
Law	<input type="checkbox"/>	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Close Friend	
Law enforcement	<input type="checkbox"/>	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Close Friend	
Criminal justice or criminology	<input type="checkbox"/>	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Close Friend	
Forensic Science	<input type="checkbox"/>	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Close Friend	
Medicine or Healthcare	<input type="checkbox"/>	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Close Friend	
Counseling, Psychology or Mental Health	<input type="checkbox"/>	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Close Friend	
Civil Rights or Social Justice Issues	<input type="checkbox"/>	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Close Friend	

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13. Have you, or anyone close to you, had any of the following experiences?

	No	Yes	Please Provide Limited Details
Victim of Crime?	<input type="checkbox"/>	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Close Friend	
Accused of a Crime?	<input type="checkbox"/>	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Close Friend	
Struggle with Drug Addiction?	<input type="checkbox"/>	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Close Friend	NO DETAILS NECESSARY

14. Would any of the experiences you noted above make it difficult for you to be fair and impartial? Yes No
If so, why?

15. Have you had any of the following court experiences?

	No	Yes	Please Provide Limited Details
Served on a jury in a criminal case?	<input type="checkbox"/>	<input type="checkbox"/>	
Served on a jury in a civil case?	<input type="checkbox"/>	<input type="checkbox"/>	
Testified as a witness in a court case?	<input type="checkbox"/>	<input type="checkbox"/>	
Served on a grand jury?	<input type="checkbox"/>	<input type="checkbox"/>	
Worked for the judicial branch?	<input type="checkbox"/>	<input type="checkbox"/>	

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16. Would any of the experiences you noted above make it difficult for you to be fair and impartial? Yes No
If so, why?

17. Please list any hobbies or special interests you have:

18. Please list any organizations you have belonged to or in which you participate, including as an active volunteer or financial supporter. This could include veterans' groups, service clubs, social clubs, unions, professional, volunteer, neighborhood, educational or political groups.

PART V. OPINIONS REGARDING JUSTICE SYSTEM

1. Do you believe that the jury system in this country is a fair system? Yes No
Why or why not?

2. Do you believe our criminal justice system works? Yes No
Why or why not?

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3. Under our system of justice, defendants are presumed innocent of the criminal charges against them. Would you have any difficulty following this principle of law? Yes No
If "yes," explain why.

4. Under our system of justice, the prosecution has the burden of proving the defendant guilty beyond a reasonable doubt. Would you have any difficulty following this principle of law?
 Yes No If "yes," explain why.

5. Under our system of justice, defendants have the right to remain silent and, if they exercise that right, their silence is not to be used against them. Would you have any difficulty following this principle of law? Yes No If "yes," explain why.

6. Under our system of justice, the potential consequences of your verdict, including potential penalty or punishment, must not in any way affect the jury's decision as to whether or not the prosecution has proven the defendant guilty beyond a reasonable doubt. Would you have any difficulty following this principle of law? Yes No If "yes," explain why.

7. Under our system of justice, the jury must decide the case solely on the evidence produced in court and the law that the judge instructs, and not because of bias, passion, prejudice, or sympathy. Would you have difficulty following this principle of law? Yes No If "yes," explain why.

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PART VI. TRIAL LENGTH AND ABILITY TO SERVE

1. Our best prediction is that jury selection will last from October 24 through November 4, 2022. You will have to appear at the Hennepin County Government Center for 1-2 days in that timeframe (your time to appear will be assigned later). If you are selected for the jury in this case, you will have to appear every weekday starting November 7, 2022 until trial and deliberations are finished. The court will be in recess, however, on November 11th and November 23rd through the 25th. It is estimated that the case will be submitted to the jury for deliberation on or before December 16, 2022. Is there any significant hardship or reason why you cannot serve during this time period?

2. During jury deliberation, the jury will be sequestered. That means the jury will work into the evenings and be taken to a hotel to stay overnight. Is there any reason you cannot be sequestered overnight?

3. How difficult do you think it would be for you to evaluate graphic photographs or video, including photos and video of a person who has died?

4. The jury is told not to read, watch, or listen to news accounts of a trial they are involved in until it is over, and not to talk to anyone about the case, not even to one another, and to not post anything on social media or elsewhere, including through jury deliberations. Would you find it difficult to follow these instructions for any reason?

5. Is there a reason why you would not be able to give your complete attention to a trial during your time as a juror?

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USE THIS PAGE IF YOU NEED ADDITIONAL SPACE FOR RESPONSES TO ANY QUESTIONS. LIST THE QUESTION(S) THESE ADDITIONAL COMMENTS RELATE TO.