

JUROR NUMBER: _____

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

_____)	
UNITED STATES OF AMERICA,)	
)	
v.)	No. 08-CR-274 (ESH)
)	
)	
KEVIN A. RING)	
_____)	

JURY QUESTIONNAIRE

TO THE PROSPECTIVE JUROR:

You have been selected as a prospective juror in the case of *United States of America v. Kevin Ring*. Those selected as members of the jury will live at home and have their evenings and weekends free to themselves. Your contact with other people will not be restricted, although you will, of course, not be permitted to talk about the case with anyone, or read, listen to, or watch any press coverage the case might receive.

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. The purpose of this questionnaire is to save time and avoid jurors having to sit and wait before they answer these or similar questions in person. After the jury has been selected, all copies of your response to the questionnaire will be returned to the Clerk of the Court and kept in confidence, under seal, not accessible to the public or the media. The attorneys are under orders to maintain the confidentiality of any information they learn in the course of reviewing this questionnaire.

Mr. Ring has been charged by the United States with violating certain federal laws between 2000 and 2004. The government alleges that the defendant conspired to provide an

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illegal gratuity and to commit wire fraud by depriving the public of the honest services of a public official, provided an illegal gratuity, and committed honest services wire fraud. The defendant denies each charge and maintains his innocence. A more detailed description of the charges will be given at the beginning of the trial. The trial is expected to last until the end of November. The Court will not sit on Thursday, November 11 (Veterans Day), Thursday, November 25 (Thanksgiving Day) or November 26. The court day usually lasts from 9:30 a.m. until approximately 4:45 p.m. This questionnaire is being distributed to you to assist the Court in selecting a jury to hear this case and for determining your availability to serve as a juror.

The only purpose of this questionnaire is to encourage your full expression and candor so that all parties have a meaningful opportunity to select a fair and impartial jury to try the issues of this case. Your full written answers will save all the parties, the Court, and yourself a great deal of time. Please do not discuss with anyone any questions or answers you give on this questionnaire. You are expected to sign the questionnaire, using only your juror number, your answers will have the effect of a statement under oath. Your answers to these questions will only be used in court.

Please answer each question below as completely and accurately as you reasonably can. Do keep in mind that there are no "right" or "wrong" answers, only complete and incomplete answers. 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. 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

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on the blank page the number of the question you are answering. Please write or print legibly using a black or blue pen. If your answers are illegible, you may be required to re-copy your answers. Do not write anything on the back of any page. **Please write your Juror number at the top of each page.**

When the jury selection process begins in the court, you may be asked some follow-up questions based on one or more of your answers to the questionnaire. Please understand that if there is any personal or confidential information that you wish to discuss privately with the Court and counsel, you will have an opportunity to do so in the oral questioning once the selection process begins.

In addition, now that you are a prospective juror, you **MUST** follow the instructions listed below until you have been excused from further service in this case.

DO NOT read anything whatsoever about this case. Please avoid any newspaper accounts that may relate to this case including articles relating to lobbying or allegations of public corruption.

DO NOT read or listen to any news accounts whether in a newspaper on the television, on the radio, or on the Internet concerning this case or about Kevin Ring.

DO NOT at any time discuss this case with anyone, including your friends, family members, or other members of this jury panel.

DO NOT let anyone, including friends, family members, court personnel, parties in this case, or persons involved in the case, talk to you about your views or any aspect of this case except officially in the courtroom.

Thank you for your cooperation with these instructions and for your careful and honest responses to the questionnaire. Your forthright and full cooperation is of vital importance to the Court and the parties.

ELLEN D. HUVELLE
United States District Judge

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I. THE PARTIES

1. Do you know any of the lawyers (Nathaniel Edmonds and Peter Koski for the government; Andrew Wise and Timothy O’Toole for the defense), the paralegals (Elizabeth Sebesky for the government; Meghan Ellis for the defense), the government law enforcement special agents (Leanna Saler and Jason Higley) or Mr. Ring?

Yes No

2. Do you know any of the witnesses or people listed on attached sheet (Exhibit A)? If yes, circle the name(s) on Exhibit A.

3. This case may last until the end of November. Do you have pressing commitments, health problems, or other hardship that would interfere with your serving as a juror?

Yes No

(a) If yes, please explain: _____

II. BACKGROUND

4. What is your date of birth? _____

5. What is the highest level of education you have completed? _____

6. What are your occupation, job title, and job responsibilities? _____

(b) Are you employed by the federal government?

Yes No

(c) If you are retired, were you at any time a federal employee?

Yes No

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7. As part of your profession or work with any organization, do you have an expense account to be used for travel, entertainment, or for any other purpose?

Yes No

8. What are your spouse's (significant other's) occupation, job title, and job responsibilities? _____

(a) Has your spouse (significant other) ever been employed by the federal government?

Yes No

9. What are the ages and occupations of your children? _____

10. What is your most frequent source of news?

- _____ Newspapers
- _____ Radio
- _____ Television
- _____ Internet
- _____ Magazines
- _____ Friends and Family Members

11. How many days per week do you read a newspaper? _____

12. Do you use electronic mail in any form, including, but not limited to:

E-mail Yes No
Texting Yes No
"Tweeting" Yes No

13. How frequently do you use electronic mail? _____

14. Where do you use electronic mail (check all that apply)?

Home Work Other

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15. Do you use a Blackberry, PDA, or other hand-held device to send and receive electronic mail?

Yes No

16. What political internet sites or weblogs do you read regularly, if any? _____

17. Do you read any publication which reports about events happening on Capitol Hill?

Yes, regularly Periodically No

18. What television programs do you watch on a regular basis? _____

19. Please list the titles of books you have read within the last year. Give a brief description of the type of book, i.e., science fiction, romance novel, biography, etc.

III. LEGAL PRINCIPLES AND EXPERIENCE WITH THE JUSTICE SYSTEM

20. Mr. Ring has been charged in an indictment. An indictment is just the formal way of informing a defendant of the nature of the charges against him and is not proof that the defendant has engaged in any illegal activity. You are not to consider the indictment as any indication of guilt, regardless of the number of charges contained in it. Do you agree with this principle of law?

Yes No

(a) If you do not agree, will you have any difficulty following that principle of law if you are selected as a juror in this trial?

Yes No

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21. In a criminal trial, every defendant is presumed to be innocent; this presumption remains with him throughout the trial, unless and until he is proven guilty beyond a reasonable doubt. Do you agree with this principle of law?

Yes No

(a) If you do not agree, will you have any difficulty following that principle of law if you are selected as a juror in this trial?

Yes No

22. The burden of proving a defendant guilty beyond a reasonable doubt rests with the government, the prosecutor, and the burden never shifts during the course of a trial; a defendant need not prove his innocence or produce any evidence, or testify. Do you feel a defendant has to testify or present evidence before you could find him not guilty?

Yes No

(a) If a defendant did not testify, would you think he is more likely guilty for not having testified or presenting any evidence?

Yes No

23. To reach a verdict, every juror must agree on the verdict. That is, any verdict must be unanimous. In deliberations you must consider the opinions and points of your fellow jurors. In the final analysis, however, you must follow your own conscience and be personally satisfied with any verdict. Would any of you have difficulty expressing your own opinions and thoughts about this case to your fellow jurors?

Yes No

24. If it should come to pass, after you have heard all the evidence, the arguments of the lawyers, and my instructions in the law - if you are then persuaded by the trial itself that the defendant is guilty of the charge beyond a reasonable doubt, then it would be your duty to vote guilty. Do you feel that you would be able to carry out that duty?

Yes No

25. On the other hand, if after you have heard all the evidence, the arguments of the lawyers, and my instructions in the law - if you then have a reasonable doubt as to the defendant's guilt of the charge, then you must vote not guilty. Do you feel that you would be able to carry out that duty?

Yes No

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26. Have you previously served on a jury?

Yes No

(a) If YES, what type of case was it?

Criminal Civil

(b) Did the jury reach a verdict?

Yes No

(c) Did you speak with the lawyers about the case after the jury concluded its deliberations?

Yes No

(d) Would anything about that prior experience affect your ability to be a fair and impartial juror in this case?

Yes No

27. Have you previously served on a grand jury?

Yes No

(a) If YES, do you understand that the functions, procedures, and rules governing a grand jury's consideration of evidence are different from a trial jury?

Yes No

(b) If YES, would anything about that experience affect your ability to be a fair and impartial juror in this case?

Yes No

28. Have you ever been a party to a lawsuit or a defendant in a criminal case?

Yes No

If YES, please describe the case and your role: _____

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29. In this case, an agent from the Federal Bureau of Investigation or another government investigative agency may be a witness. Would you be inclined to give greater or lesser weight to a law enforcement officer's testimony than that of any other witness, simply because he or she is a law enforcement officer?

Yes No

30. Are you, a relative, or close personal friend, presently or previously employed by any law enforcement agency? Law enforcement agency includes any police department, in or outside the District of Columbia, special police officers, prosecutor's offices, U.S. Attorney's Office, D.C. Corporation Counsel, U.S. Department of Justice, U.S. Marshal's Service, correctional officers, Sheriff's Departments, Internal Revenue Service, U.S. Secret Service, probation office, parole office, D.C. Superior Court, and the U.S. District Court.

Yes No

31. Are you, a relative, or close personal friend, presently or previously employed by a criminal defense lawyer, or involved in any way in the defense of a criminal case?

Yes No

32. Are you a lawyer or have you attended law school?

Yes No

33. Have you, a relative, or close personal friend been a victim of or a witness to a crime the same as or similar to the crime(s) charged in this case, or been arrested, charged with a crime, or found guilty or gone to jail for the same or a similar type of crime as the one(s) charged in this case?

Yes No

34. Have you, a relative, or a close personal friend been either a victim of, a witness to, or arrested or convicted of any crime?

Yes No

- a) Would anything about that experience interfere with your ability to be fair and impartial in this case?

Yes No

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35. Have you, a relative, or close personal friend ever been investigated for violating ethical rules by an employer or other organization?

Yes No

IV. POLITICS & LOBBYING

36. Have you, a relative or close personal friend ever been a candidate for an elected office, held elected office, or worked for anyone who held an elected position?

Yes No

37. Have you, a relative, or close personal friend ever served in a politically appointed office?

Yes No

38. Have you, a relative, or close personal friend ever served in any position in government in which restrictions existed prohibiting you from receiving certain types of gifts?

Yes No

(a) If YES, please identify the position and the approximate duties of each position:

(b) What were the restrictions:

39. Have you, a relative, or close personal friend ever held a position, whether paid or unpaid, in a political campaign?

Yes No

40. Have you, a relative, or close personal friend ever served as a member or officer of a political action committee?

Yes No

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41. Have you, a relative, or close personal friend ever been involved in fundraising activities for a political organization or political candidate?

Yes No

42. Have you, a relative or close personal friend ever worked as an election official in an election?

Yes No

43. Have you ever contributed money to a political candidate?

Yes No

44. Have you donated money to or otherwise supported organizations that advocate “open” or “accountable” government such as Common Cause, Citizens for Responsibility and Ethics in Washington, or Taxpayers for Common Sense?

Yes No

45. Would you judge the credibility of a politician or public figure by any different standards than you would judge the credibility of any other witness?

Yes No

46. The indictment charges Kevin Ring with various crimes in connection with his work as a lobbyist at the law firms of Preston Gates and Greenberg Traurig, where he worked for and/or with Jack Abramoff.

(a) Have you heard or read about Mr. Ring?

Yes No

(b) Have you heard or read about Jack Abramoff?

Yes No

(c) If the evidence showed Mr. Abramoff engaged in illegal conduct, could you keep an open mind as to Mr. Ring and consider the evidence against him based upon its own merits?

Yes No

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(d) Is there anything about these allegations or what you have heard or read that would make it difficult for you to be a fair and impartial juror in this case?

Yes No

If YES, please explain: _____

47. Have you, a relative or close personal friend ever worked in government relations or participated in lobbying the government?

Yes No

48. Which of the following, if any, fits with your view of lobbying? Answer either yes or no.

Yes No Lobbying is the exercise of the democratic right of American industries, businesses, and individuals to influence lawmaking, government policy and decision making that affects their interests.

Yes No Lobbying is influence peddling on behalf of wealthy people or businesses.

Yes No Lobbying, whether on behalf of rich people, the middle class, or poor people, should be prohibited.

Yes No Lobbying can help ensure that government officials make decisions that are in the best interests of the United States.

Yes No Lobbying is a fancy term for trying to get government officials to do what the lobbyist wants even if it is not good for the country.

Yes No Lobbying is paying off politicians and government officials to get them to do something.

Yes No Lobbying is legitimate business.

Yes No Lobbying is a necessary part of democratic society based on the First Amendment of the United States Constitution.

49. Would the fact that someone lobbied on behalf of Indian tribes that operated casinos prevent you from being a fair and impartial juror in this case?

Yes No

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50. What is your overall opinion of the ethics and honesty of members of the United States Congress and their staff?

Favorable _____

Neutral _____

Unfavorable _____

No opinion _____

51. What is your overall opinion of the ethics and honesty of members of the Executive Branch (the White House and various Executive branch agencies) and their staff?

Favorable _____

Neutral _____

Unfavorable _____

No opinion _____

V. CONCLUSION

52. Is there anything about you that this questionnaire does not address that you think might be important for the attorneys and the judge to know?

Yes

No

If YES, please explain: _____

53. Is there any reason you can think of why you could not sit fairly, attentively, or impartially as a juror in this case?

Yes

No

If YES, please explain: _____

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SIGNATURE

I, Juror No. _____, hereby declare under penalty of perjury that the foregoing answers set forth in this juror 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 in this jury questionnaire myself.

Executed in the District of Columbia, this ____ day of October, 2010.

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