

District Court Use Only: \_\_\_\_\_



## Hennepin County Special Juror Questionnaire

You are a potential juror in the trial of four former police officers charged in connection with the death of George Floyd. From this day forward, DO NOT read or intentionally view anything about these cases or do any investigation or research related to these cases.

The information in this questionnaire is for the judge and attorneys that will be involved in this trial and is required information. This questionnaire will be filed as a public document in the court record at the end of the trial, but until then, your name and the fact that you are a potential juror will NOT be public. For that reason, DO NOT disclose to anyone that you are a potential juror in this case.

**\*\*\*PLEASE USE BLACK PEN ONLY AND DO NOT WRITE ON THE BACK OF ANY PAGE.**

**\*\*\*YOU MUST RETURN THIS SHEET AND THE COMPLETED QUESTIONNAIRE BY JANUARY 2, 2021.**

Your Juror Identification Number (9 digits): \_\_\_\_\_

Your Full Name: \_\_\_\_\_

Your Phone Numbers (cell, work and home): \_\_\_\_\_

Your Email Address: \_\_\_\_\_

**You should bring a picture ID with you when you come to court for the first time.**

Your contact information will remain confidential and available only to District Court staff. The parties and attorneys for the parties will have access to your name, but will refer to you in the courtroom by a random number to be assigned by District Court. Contact the District Court Jury Office at (612) 348-3158 if you have any questions.

By returning the completed questionnaire, you are declaring under penalty of perjury that everything you have stated in this document is true and correct.

I understand and do so declare.

Sign Here: \_\_\_\_\_

Signed on this date \_\_\_\_\_ in \_\_\_\_\_ County.

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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,  
Thomas Kiernan Lane ,  
J. Alexander Kueng,

Dist Ct. File 27-CR-20-12949  
Dist Ct. File 27-CR-20-12951  
Dist Ct. File 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.

\*\*\*Extra blank pages are attached if you need additional room for answers\*\*\*

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**PART I. KNOWLEDGE OF THE CASE**

1. On May 25, 2020, George Floyd died after an interaction with Minneapolis Police. The charges in this case stem from that incident. 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, AND DEFENDANTS , TOU THAO, J. ALEXANDER KUENG AND THOMAS LANE. 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. THIS WILL HELP TO SHORTEN THE JURY SELECTION PROCESS.**

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2. From what you have seen, read, or heard, what general impression of the defendants do you have, if any? Why do you feel that way?
  - a. Do you have different impressions for different defendants (Mr. Thao, Mr. Kueng, and Mr. Lane)? If so, what are they and why do you feel that way?
  
3. From what you have seen, read, or heard, do you have a general impression of George Floyd? Why do you feel that way?
  
4. Do you, or someone close to you, have any direct or indirect connections to these events?  
 Yes  No If yes, please explain:
  
5. 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
  - a. If you have watched the video of George Floyd's death, what did you think?
  
6. 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  
What did you talk about?
  
7. Have you ever posted, commented, or reshared something on social media relating to George Floyd, Black Lives Matter, Blue Lives Matter, policing, or the defendants? Please explain to the best of your memory.

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8. Have you ever spoken with someone who has – or says they have – direct knowledge of the case?
9. Have you, or someone close to you, participated in any of the demonstrations, marches, riots, protests, or civil disobedience related to policing that took place in *Minnesota* since May 25, 2020?  Yes, me  Yes, someone close to me  No.  
If you participated, explain how you were involved.

If you participated, did you carry a sign? What did it say?

10. Did you, or someone close to you, participate in any of the demonstrations, marches, riots, protests, or civil disobedience related to policing that took place *anywhere* since May 25, 2020?  Yes, me  Yes, someone close to me  No.  
If you participated, explain how much you were involved.

If you participated, did you carry a sign? What did it say?

11. 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 If yes, please explain:
12. Do you believe your community has been negatively or positively affected by any of the protests that have taken place since George Floyd's death?

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13. Would what you have heard or seen about this case (or the Defendants or George Floyd) affect your ability to decide this case only on the evidence you receive in court, follow the law, and decide the case in a fair and impartial manner? **Please be honest and remember you are under oath and that answering any way is not a judgement of your character.**
14. If the evidence at trial supported a verdict of “not guilty” for any of the defendants, would you be ashamed or afraid of people finding out you were on the jury? Please explain your answer:

## **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?
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?
6. Which local radio or television news station do you listen to or watch most?
7. How often do you see local news or news related updates on social media sites such as Facebook or Twitter?
8. What social media platforms do you use regularly, if any?

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**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 affect your ability to render a fair and impartial verdict in this case? If “Yes”, please explain:
  
2. Do you have regular contact with any law enforcement agencies, employees, or officers through your work, your neighborhood, or in your social life?  
If “Yes,” please explain:
  
3. Have you, or someone close to you, ever helped support or advocated in favor of or against police reform, defunding, or abolition? If “Yes,” please explain:
  
4. Describe your **best** interaction with law enforcement:
  
5. Describe your **worst** interaction with law enforcement:
  
6. Is there anything about a police officer that would make you trust his/her testimony less or more than a civilian?
  
7. Have you, or someone close to you, ever been arrested for a crime?     Yes  No  
  
If yes, how do you feel the police handle the arrest?

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8. 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:

9. What is your opinion of how the police responded to the crime and victim?

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

If "Yes," please explain:

11. Has anyone you know had an encounter with the police where they believe excessive force was used?

12. 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:

13. 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.	1	2	3	4	5
b. If I was accused of a crime I didn't commit I would testify and tell the jury I was innocent. Only guilty people stay quiet.	1	2	3	4	5
c. Police in this country treat whites and blacks equally.	1	2	3	4	5
d. Police in my community make me feel safe.	1	2	3	4	5
e. I support defunding, reforming, or abolishing the Minneapolis Police Department.	1	2	3	4	5
f. Minneapolis police officers are more likely to respond with force when confronting minority suspects than when dealing with white suspects.	1	2	3	4	5
g. Because law enforcement officers have such dangerous jobs, it is difficult to second guess decisions they make while on duty.	1	2	3	4	5

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h.	The criminal justice system is biased against racial and ethnic minorities.	1	2	3	4	5
i.	I do not trust the police.	1	2	3	4	5
j.	Police officers can make mistakes and still be good police officers.	1	2	3	4	5
k.	People today do not give our law enforcement officers the respect they deserve.	1	2	3	4	5
l.	Police departments try to cover up excessive force rather than correct it.	1	2	3	4	5
m.	If someone has been in trouble before, they are more likely to have been guilty of the current accusation. Where there is smoke, there is fire.	1	2	3	4	5
n.	Line workers know their job best. Managers do not understand it better than they do.	1	2	3	4	5
o.	It is hard to see police officers as individuals, not just cops.	1	2	3	4	5
p.	If I witness a crime and don't try to help I am just as wrong as the person who committed the crime.	1	2	3	4	5
q.	My community has become more safe since the summer of 2020.	1	2	3	4	5
r.	Police protect myself and my community from crime.	1	2	3	4	5
s.	The jurors in this case will be responsible for what happens to Minneapolis after a verdict is read.	1	2	3	4	5
t.	I am worried/concerned about how my community will react to different verdicts in this case.	1	2	3	4	5
u.	Police relations in my community have gotten better since the summer of 2020.	1	2	3	4	5
v.	I would be proud of myself or someone close to me if they wanted to become a police officer.	1	2	3	4	5
w.	There are situations where police should be allowed to use force when arresting.	1	2	3	4	5

14. Have you ever been trained on how to restrain someone or use a chokehold?  Yes  No

15. Do you have any martial arts training or experience?  Yes  No

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16. Other than what you have already described above, have you, or anyone close to you, participated in protests, riots, demonstrations, marches or civil disobedience about policing since May 25, 2020 in Minnesota or anywhere else?  Yes  No If yes, please explain:
17. Do you know what the acronym "ACAB" stands for?  Yes  No If yes, what does it mean to you and what is your opinion of it?
18. How favorable or unfavorable are you about the phrase or movement "Black Lives Matter"?  Very favorable  Somewhat favorable  Neutral  Somewhat unfavorable  Very unfavorable. Please explain your choice:
19. How favorable or unfavorable are you about the phrase or movement "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.)? Your

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occupation\employer?

4. 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?
6. Please list other cities or states you have lived in and approximately how long: (include up to 5 most recent places)
7. Marital status? (including single, married, divorced, widowed, live-in partner, girlfriend/boyfriend):
8. Spouse or partner's (including boyfriend/girlfriend) work status (Full-time, Part-Time, Self-employed, Disabled, Student, Retired, etc.)? Occupation\employer?
9. Highest level of education completed by spouse or partner (including boyfriend/girlfriend) (list any degrees and areas of study beyond high school)?
10. What are the ages, genders, and work of your children if you have any?
11. Have you ever served in the military? If so, please list Branch, Highest Rank, Approximate Dates of Service and whether you served in combat.
12. Do you, or 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	

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		<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	

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	

14. Would any of the experiences you noted above affect your ability to be fair and impartial? If so, how?

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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"/>	

16. Would any of the experiences you noted above affect your ability to be fair and impartial? If so, how?

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 a volunteer or financial supporter. This could include veterans groups, service clubs, social clubs, unions, professional, volunteer, neighborhood, educational or political groups.



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8. Under our system of justice, the jury must decide the case only on the evidence produced in court and the law that the judge instructs, and not because of bias, passion, prejudice, or sympathy. Do you think these would be an easy or difficult to follow? How/why?

## **PART VI. TRIAL LENGTH AND ABILITY TO SERVE**

1. Our best prediction is that jury selection will last from March 8, 2022 to April 1, 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 April 4, 2022 until trial and deliberations are finished (estimated to be six to eight weeks). Is there any significant hardship or reason why you cannot serve during this time period?
2. During jury deliberation (and possibly for part of the trial), the jury may 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. Secure parking will be provided for jurors, free of charge. Are you able to drive yourself, or have someone drop you off each day?
4. 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?
5. The jury is told not to read, watch, or listen to news accounts of a trial they are involved in until it is over. This includes going on social media. Would you find it easy or difficult to follow these instructions for any reason? Please explain.

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6. The jury is told 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 easy or difficult to follow these instructions? Please explain.
  
7. Is there a reason why you would not be able to give your complete attention to a trial during your time as a juror?
  
  
  
  
  
  
  
  
  
  
8. Do you have any religious or philosophical beliefs, which would make it difficult for you to be a juror?
  
  
  
  
  
  
  
  
  
  
9. Do you have any medical, visual, hearing, physical, or other impairment that may affect your ability to serve as a juror on this case?
  
  
  
  
  
  
  
  
  
  
10. Is there any other reason that would affect your ability to be a fair and impartial juror in this case? If yes, please explain.
  
  
  
  
  
  
  
  
  
  
11. Do you, or someone close to you, have any direct or indirect connection to someone involved in the case (this includes potential witnesses, attorneys, George Floyd, defendants, and court personnel)?
  
  
  
  
  
  
  
  
  
  
12. Is there anything else the judge and attorneys should know about you in relation to

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serving on this jury?

13. Do you want to serve as a juror in this case?  Yes  No  Not Sure

14. Why do you feel that way about serving as a juror in this case?

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