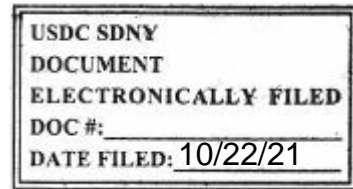


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



United States of America,

–v–

Ghislaine Maxwell,

Defendant.

20-CR-330 (AJN)

ORDER

ALISON J. NATHAN, District Judge:

Attached are the Court’s draft jury questionnaire—with changes adopted at yesterday’s proceeding in redline—and draft voir dire.

In light of the District’s COVID-19 protocols, the Court has proposed an additional question on page 6 of the questionnaire, which is also indicated in redline.

SO ORDERED.

Dated: October 22, 2021
New York, New York

A handwritten signature in black ink, appearing to read "Alison J. Nathan".

ALISON J. NATHAN
United States District Judge

DRAFT – October 21, 2021

Juror ID: _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
UNITED STATES OF AMERICA	:	
	:	
-v-	:	20 Cr. 330 (AJN)
	:	
GHISLAINE MAXWELL,	:	<u>JURY</u>
	:	<u>QUESTIONNAIRE</u>
	:	
Defendant.	:	
	:	
-----	X	

INSTRUCTION SHEET

Dear Juror:

Please call (212) 805 0158 on November 15, 2021 after 6:00 p.m. for further reporting instructions. Please bring this instruction sheet with you to the courthouse if you are instructed to return.

Juror ID: _____

[INSERT JUROR INFORMATION SHEET FROM JURY DEPARTMENT]

Juror ID: _____

PRELIMINARY INSTRUCTIONS

Please read the following instructions carefully before completing any portion of this questionnaire. Please print your juror number in the space provided at the top of **each** page. **Do not write your name on the questionnaire.** Please answer each and every question fully. Some questions have more than one part.

YOU ARE SWORN TO GIVE TRUE AND COMPLETE ANSWERS TO ALL QUESTIONS IN THIS QUESTIONNAIRE. This questionnaire is designed to help simplify and shorten the jury selection process. The purpose of the questionnaire is to determine whether prospective jurors can decide this case impartially based upon the evidence presented at trial and the legal instructions given by the presiding judge. The questions are not intended to inquire unnecessarily into personal matters. Although some of the questions may appear to be of a personal nature, please understand that the Court and the parties must learn enough information about each juror's background and experiences to select a fair and impartial jury.

Please answer all questions to the best of your ability. If you do not know the answer to a question then write, "I don't know." There are no "right" or "wrong" answers, only truthful answers. If you have strong feelings about this case in general, please do not hesitate to share them. Although you may be a perfectly good juror in another case, this may or may not be the right case for you to sit on as an impartial juror. Both parties have the right to get honest answers and to hear your true opinions. Do not discuss the case or your answers with anyone. It is important that the answers be yours alone. Remember, you are sworn to give true and complete answers to all questions.

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 on the blank page the number of the question you are answering. Do not write anything on the back of any page.

DO NOT DISCUSS YOUR QUESTIONS AND ANSWERS OR THE CASE WITH ANYONE, NOW OR UNTIL FURTHER INSTRUCTED BY THE COURT. You should not discuss the questions or answers with fellow jurors. It is very important that your answers be your own individual answers. More broadly, do not discuss the case with anyone, including the lawyers (except in the presence of the Court), your fellow jurors, your family, your friends, or anyone else. Do not communicate about the case in any way, including telephone, e-mail, any social media app or website (such as Facebook), any communications app or website (such as Twitter). You must also avoid reading or hearing about the case (or anyone participating in the case) in newspapers, in magazines, on the radio or television, or on the Internet.

DO NOT DO YOUR OWN RESEARCH ON THE CASE. Do not conduct any research into the case (or anyone participating in the case) at any time before your entire jury service has been completed. That includes performing Internet searches, asking other people about the case, reading news stories, books, or reports about the case, or watching films or television programs that relate to the case. Do not read, watch, or listen to any information about this case.

Juror ID: _____

Your name will not be disclosed or connected to this questionnaire beyond the Judge and the parties in this case. However, if you believe that any of your answers contain private information that could embarrass you or otherwise seriously compromise your privacy and wish to request that the Court keep them confidential and not distribute them beyond the Judge and parties, please indicate the particular question number at the end of the questionnaire.

SUMMARY OF THE CASE

The Court is selecting a jury for a trial commencing on Monday, November 29, 2021. Although it is never possible to predict the length of a trial, currently this trial is expected to last approximately six weeks.

This is a criminal case. The Defendant, Ghislaine Maxwell, has been charged in an Indictment with various criminal offenses. The Indictment is not evidence. It simply contains the charges—referred to as “counts”—that the Government intends to prove to the jury at trial beyond a reasonable doubt.

The charges in the Indictment stem from allegations that from at least 1994 through 2004, the Defendant conspired with and aided and abetted Jeffrey Epstein to entice minors to travel to engage in criminal sexual activity, to transport minors to engage in criminal sexual activity, and to engage in sex trafficking of a minor.

The Indictment charges the Defendant in 6 counts: Count One of the Indictment charges the Defendant with conspiring with Jeffrey Epstein and others to entice minors to travel to engage in sexual activity for which a person can be charged with a criminal offense. Count Two charges the Defendant with enticing a minor to travel to engage in sexual activity for which a person can be charged with a criminal offense, and aiding and abetting the same. Count Three charges the Defendant with conspiring with Epstein and others to transport minors to engage in sexual activity for which a person can be charged with a criminal offense. Count Four charges the Defendant with transporting a minor to engage in sexual activity for which a person can be charged with a criminal offense, and aiding and abetting the same. Count Five charges the Defendant with participating in a sex trafficking conspiracy. Count Six charges the Defendant with sex trafficking of a minor, and aiding and abetting the same.

Ms. Maxwell has pled not guilty to all charges. Ms. Maxwell is presumed innocent, and before she can be found guilty on any charge, the jury must find that the Government has proven each element of that crime beyond a reasonable doubt.

Juror ID: _____

SCHEDULE

Potential jurors will be called back for further questioning and jury selection from Tuesday, November 16, 2021, through Friday, November 19, 2021. Your availability during that week will be required.

The trial will commence on Monday, November 29, 2021. The trial is expected to last about six weeks. Generally, trial will be held five days per week, Monday through Friday, from 9:30 a.m. until 5:00 p.m. Trial will not be held on Friday, December 24, 2021 (Christmas Eve Day) and December 31, 2021 (New Year's Eve).

If you are selected as a juror, you will be required to be present for the taking of testimony and evidence for as long as the trial lasts. There are no plans to sequester the jury, which means you will go home every day after court.

All jury service involves some degree of hardship. Our court and justice system depends on citizens doing their civic duty to serve as jurors, which involves temporarily putting aside their regular business for jury service. The Court views service on a jury to be one of the highest duties a citizen owes to the United States. Mere inconvenience or the usual financial hardship of jury service will not be sufficient to excuse a prospective juror. You must show extraordinary personal or financial hardship to be excused from service.

Juror ID: _____

PLEASE ANSWER THE FOLLOWING QUESTIONS:

ABILITY TO SERVE	
	<p>Please note: In the event you are excused from service on this jury, you will likely not be excused from jury service in general. You will instead be required to report to the Court’s Jury Clerk for placement on another panel for another case.</p>
1.	<p>Do you have any unmovable commitments between November 16, 2021, and November 19, 2021, which is when jury selection will take place?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
1a.	<p>If yes, please explain (without indicating the name of where you work or the names of any family members or friends, or other personal information that might identify who you are):</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
2.	<p>Do you have any unmovable commitments between November 29, 2021, and approximately January 15, 2022, which is the estimated length for trial?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
2a.	<p>If yes, please explain (without indicating the name of where you work or the names of any family members or friends, or other personal information that might identify who you are):</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<u>3.</u>	<p><u>Do you have any international travel plans between now and November 29, 2021?</u></p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<u>3.4.</u>	<p>Do any circumstances exist such that serving on the jury in this case would entail <u>serious</u> hardship or <u>extreme</u> inconvenience?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<u>3a.4a</u>	<p>If yes, please briefly describe the serious hardship or extreme inconvenience:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

<p><u>4.5.</u></p>	<p>Do you have any personal commitments that would make it difficult for you to get to court by 9:30 a.m., every day of trial, or remain at the courthouse until 5:00 p.m.? (Please note, the Court will arrange and provide transportation to and from the Courthouse each day for selected jurors).</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>4a.5a</u></p>	<p>If yes, please explain why you would be unable to get to court by 9:30 a.m. or remain until 5:00 p.m.:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>5.6.</u></p>	<p>Do you have any difficulty reading, speaking, or understanding English?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>6.7.</u></p>	<p>Do you have any medical, physical, or mental condition or illness that makes you unable to serve on a jury, including difficulty hearing, seeing, reading, or concentrating?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>6a.7a</u></p>	<p>If yes, please briefly describe the condition or illness. If you believe you could serve as a juror if such condition were accommodated in some way, please state the accommodation.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>7.8.</u></p>	<p>Are you taking any medication which would prevent you from giving full attention to all the evidence at this trial?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>7a.8a</u></p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

8-9.	<p>Do you have any religious, philosophical, or other beliefs that would make you unable to render a verdict in a criminal case?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
8a-9a	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

BASIC LEGAL PRINCIPLES AND MEDIA RESTRICTIONS	
9-10.	<p>Under the law, the facts are for the jury to determine and the law is for the Judge to determine. You are required to accept the law as the Judge explains it to you even if you do not like the law or disagree with it, and you must determine the facts according to those instructions. Do you accept this principle, and will you be able to follow the Judge’s instructions if selected to serve on this jury?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
9a-10	<p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
10-11	<p>The law provides that a defendant in a criminal case is presumed innocent at all stages of the trial and is not required to put on any defense at all. The Government is required to prove the defendant guilty beyond a reasonable doubt on each charge. Do you accept these principles, and will you be able to apply them if selected to serve on this jury?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
10a-1	<p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

<p>11.12</p>	<p>The law provides that a defendant in a criminal case has an absolute right not to testify, and that a juror cannot hold it against the defendant if she chooses not to testify. Do you accept this principle, and will you be able to apply it if selected to serve on this jury?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>11a.1</p>	<p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>12.13</p>	<p>A juror is required by law to make his or her decision based solely on the evidence or lack of evidence presented in Court, and not on the basis of conjecture, suspicion, bias, sympathy, or prejudice. Do you accept this principle, and will you be able to apply it if selected to serve on this jury?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>12a.1</p>	<p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>13.14</p>	<p>Under the law, the question of punishment is for the Court alone to decide, and thus the issue of punishment must not enter into your deliberations as to whether the defendant is guilty or not guilty as charged. Do you accept this principle, and will you be able to apply it if selected to serve on this jury?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>13a.1</p>	<p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

<p>14.15</p>	<p>You may hear testimony in this case that law enforcement officers recovered certain evidence from searches. The Court will instruct you that those searches were legal and that the evidence obtained from those searches is admissible in this case. Do you have any feelings or opinions about searches conducted by law enforcement officers, or the use of evidence obtained from searches, that would affect your ability to be fair and impartial in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>14a.1</p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>15.16</p>	<p>You also may hear testimony in this case from expert witnesses. Have you had any experiences with experts, or do you have any general feelings about the use of experts, that would affect your ability to be fair and impartial in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>15a.1</p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>16.17</p>	<p>As instructed above, from now and until your jury service is complete, you are instructed to avoid all media coverage and not to go on the Internet with regard to this case for any purpose. That is, you are forbidden from consuming any news media or social media, or any discussion of this case (or of anyone participating in the case) outside of the courtroom whatsoever. You also must not discuss this case with anyone. This includes your family, friends, spouse, domestic partner, colleagues, and co-workers. These instructions apply from now and until you are either dismissed from jury selection or chosen as a juror and the trial is complete. When we return for the next step in jury selection, the Judge will ask you if you have followed this instruction.</p> <p>Do you have any reservations or concerns about your ability or willingness to follow this instruction?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>

Juror ID: _____

<u>16a.1</u>	If yes, please explain: <hr/> <hr/> <hr/> <hr/>
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PRIOR JURY SERVICE	
<u>17.18</u>	Have you ever served as a juror in a trial in any court? <input type="checkbox"/> Yes <input type="checkbox"/> No
<u>18.19</u>	Have you ever at any time served as a member of a grand jury, whether in federal, state, county, or city court? <input type="checkbox"/> Yes <input type="checkbox"/> No

EXPERIENCE AS A WITNESS, DEFENDANT, OR CRIME VICTIM	
<u>19.20</u>	Have you, or has any relative or close friend, ever participated in a state or federal court case, whether criminal or civil, as a witness, plaintiff, or defendant? <input type="checkbox"/> Yes (self) <input type="checkbox"/> Yes (friend or family member) <input type="checkbox"/> No
<u>19a.2</u>	If yes, is there anything about that experience that would prevent you from acting as a fair and impartial juror in this case? <input type="checkbox"/> Yes <input type="checkbox"/> No
<u>19b.2</u> <u>0b.</u>	If yes to <u>19a.20a</u> , please explain: <hr/> <hr/> <hr/> <hr/>
<u>20.21</u>	Have you or any relative or close friend ever been involved or appeared as a witness in any investigation by a federal or state grand jury or by a congressional or state legislative committee, licensing authority, or governmental agency, or been questioned in any matter by any federal, state, or local law enforcement agency? <input type="checkbox"/> Yes (self) <input type="checkbox"/> Yes (friend or family member) <input type="checkbox"/> No

Juror ID: _____

<p>20a-2</p>	<p>If yes, is there anything about that experience that would prevent you from acting as a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>20b2 1b.</p>	<p>If yes to 20a21a, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>21-22</p>	<p>Have you, or has any relative or close friend, ever been subpoenaed for any inquiry or investigation?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes (self) <input type="checkbox"/> Yes (friend or family member) <input type="checkbox"/> No </p>
<p>21a-2</p>	<p>If yes, is there anything about that experience that would prevent you from acting as a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>21b2 2b.</p>	<p>If yes to 21a22a, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>22-23</p>	<p>Have you, or has any relative or close friend, ever been arrested or charged with a crime?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes (self) <input type="checkbox"/> Yes (friend or family member) <input type="checkbox"/> No </p>
<p>22a-2</p>	<p>If yes, is there anything about that experience that would prevent you from acting as a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>22b2 3b.</p>	<p>If yes to 22a23a, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

<p><u>23-24</u></p>	<p>Have you, or has any relative or close friend, ever been the subject of any investigation or accusation by any grand jury, state or federal, or any other investigation?</p> <p><input type="checkbox"/> Yes (self) <input type="checkbox"/> Yes (friend or family member) <input type="checkbox"/> No</p>
<p><u>23a-2</u></p>	<p>If yes, is there anything about that experience that would prevent you from acting as a fair and impartial juror in this case?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><u>23b2</u> <u>4b.</u></p>	<p>If yes to <u>23a24a</u>, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>24-25</u></p>	<p>Have you, or any of your relatives or close friends, ever been a victim of a crime?</p> <p><input type="checkbox"/> Yes (self) <input type="checkbox"/> Yes (friend or family member) <input type="checkbox"/> No</p>
<p><u>24a-2</u></p>	<p>If yes, is there anything about that experience that would prevent you from acting as a fair and impartial juror in this case?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><u>24b2</u> <u>5b.</u></p>	<p>If yes to <u>24a25a</u>, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>25-26</u></p>	<p>Have you, or has any member of your family or any of your close friends—either as individuals or in the course of their business affairs—ever been a party to a legal action or dispute with the United States, or with any of the officers, departments, agencies, or employees of the United States, including the United States Attorney’s Office, the FBI, or the NYPD?</p> <p><input type="checkbox"/> Yes (self) <input type="checkbox"/> Yes (friend or family member) <input type="checkbox"/> No</p>

Juror ID: _____

<p><u>25a-2</u></p>	<p>If yes, is there anything about that experience that would prevent you from acting as a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>25b2</u> <u>6b.</u></p>	<p>If yes to <u>25a26a</u>, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>26-27</u></p>	<p>Have you, or has any member of your family, ever had a dispute concerning money owed to you by the Government or owed by you to the Government?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes (self) <input type="checkbox"/> Yes (friend or family member) <input type="checkbox"/> No </p>
<p><u>26a-2</u></p>	<p>If yes, is there anything about that experience that would prevent you from acting as a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>26b2</u> <u>7b.</u></p>	<p>If yes to <u>26a27a</u>, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

	<p>RELATIONSHIP WITH, AND VIEW OF, GOVERNMENT, DEFENSE, AND OTHERS</p>
<p><u>27-28</u></p>	<p>Do you or any member of your family or a close friend work in law, law enforcement, the justice system, or the courts?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>27a-2</u></p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

<p>27b2 8b.</p>	<p>If yes to 2728, would this affect your ability to serve as a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>27e2 8c.</p>	<p>If yes to 27b28b, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>28-29</p>	<p>Do you know or have any association—professional, business, or social, direct or indirect—with any member of the staff of the United States Attorney’s Office for the Southern District of New York?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>28a-2</p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>28b2 9b.</p>	<p>If yes to 2829, would this affect your ability to serve as a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>28e2 9c.</p>	<p>If yes to 28b29b, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>29-30</p>	<p>Do you know or have any association—professional, business, or social, direct or indirect—with the Federal Bureau of Investigation, commonly known as the FBI?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>29a-3</p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

<p>29b3 0b.</p>	<p>If yes to 2930, would this affect your ability to serve as a fair and impartial juror in this case?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>29e3 0c.</p>	<p>If yes to 29b30b, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>30.31</p>	<p>Do you know or have any association—professional, business, or social, direct or indirect—with the New York City Police Department, commonly known as the NYPD?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>30a.3</p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>30b3 1b.</p>	<p>If yes to 3031, would this affect your ability to serve as a fair and impartial juror in this case?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>30e3 1c.</p>	<p>If yes to 30b31b, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>31.32</p>	<p>Do you have any opinion of the U.S. Attorney’s Office for the Southern District of New York or, the U.S. Attorney Damian Williams, or the former Acting U.S. Attorney Audrey Strauss that might make it difficult for you to be a fair and impartial juror in this case?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

Juror ID: _____

<u>31a.3</u>	If yes, please explain: <hr/> <hr/> <hr/> <hr/>
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PERSONAL RELATIONSHIP WITH CASE PARTICIPANTS													
<u>32.33</u>	The next subset of questions asks whether you or any member of your family or a close friend <u>personally</u> knows or has past or present dealings with individuals involved in this case. To “personally know” means to have some direct or personal knowledge or connection to the following individuals. If you have only heard the names through media or social media, for example, that is not personal knowledge.												
<u>32a3</u> <u>3a.</u>	Do you or does any member of your family or a close friend <u>personally</u> know or have past or present dealings with the Defendant in this case, Ghislaine Maxwell, or her family members? <div style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </div>												
<u>32b3</u> <u>3b.</u>	Do you or does any member of your family or a close friend <u>personally</u> know or have past or present dealings with Jeffrey Epstein? <div style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </div>												
<u>32e3</u> <u>3c.</u>	Do you or does any member of your family or a close friend <u>personally</u> know or have past or present dealings with the U.S. Attorney for the Southern District of New York, Damian Williams, the former Acting U.S. Attorney for the Southern District of New York, Audrey Strauss , or anyone else who works for or used to work for the U.S. Attorney’s Office for the Southern District of New York? <div style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </div>												
<u>32d3</u> <u>3d.</u>	Do you or does any member of your family or a close friend <u>personally</u> know or have past or present dealings with any of the Assistant United States Attorneys who are prosecuting this case: <table style="width: 100%; border: none;"> <tr> <td style="padding-left: 40px;">Maurene Comey</td> <td style="padding-left: 20px;"><input type="checkbox"/> Yes</td> <td style="padding-left: 20px;"><input type="checkbox"/> No</td> </tr> <tr> <td style="padding-left: 40px;">Alison Moe</td> <td style="padding-left: 20px;"><input type="checkbox"/> Yes</td> <td style="padding-left: 20px;"><input type="checkbox"/> No</td> </tr> <tr> <td style="padding-left: 40px;">Lara Pomerantz</td> <td style="padding-left: 20px;"><input type="checkbox"/> Yes</td> <td style="padding-left: 20px;"><input type="checkbox"/> No</td> </tr> <tr> <td style="padding-left: 40px;">Andrew Rohrbach</td> <td style="padding-left: 20px;"><input type="checkbox"/> Yes</td> <td style="padding-left: 20px;"><input type="checkbox"/> No</td> </tr> </table>	Maurene Comey	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Alison Moe	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Lara Pomerantz	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Andrew Rohrbach	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Maurene Comey	<input type="checkbox"/> Yes	<input type="checkbox"/> No											
Alison Moe	<input type="checkbox"/> Yes	<input type="checkbox"/> No											
Lara Pomerantz	<input type="checkbox"/> Yes	<input type="checkbox"/> No											
Andrew Rohrbach	<input type="checkbox"/> Yes	<input type="checkbox"/> No											

Juror ID: _____

<p>32e3 3e.</p>	<p>Do you or does any member of your family or a close friend <u>personally</u> know or have past or present dealings with any of the defense attorneys or law firms who are representing the Defendant:</p> <p>Christian Everdell of Cohen & Gresser LLP <input type="checkbox"/> Yes <input type="checkbox"/> No Jeffrey Pagliuca of Haddon, Morgan and Foreman, P.C. <input type="checkbox"/> Yes <input type="checkbox"/> No Laura Menninger of Haddon, Morgan and Foreman, P.C. <input type="checkbox"/> Yes <input type="checkbox"/> No Bobbi Sternheim of Law Offices of Bobbi C. Sternheim <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>32f3 3f.</p>	<p>Do you or does any member of your family or a close friend <u>personally</u> know or have past or present dealings with the United States District Court Judge who is presiding over this case, Alison J. Nathan, or anyone who works on her staff?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>32g3 3g.</p>	<p>If you answered “yes” to any of the above sub-questions (32a, 32b, 32e, 32d, 32e33a, 33b, 33c, 33d, 33e, or 32f33f), please explain whom you know, how you know the individual(s), and whether your relationship with that person might make it difficult for you to be a fair and impartial juror in this case:</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

Juror ID: _____

KNOWLEDGE OF CASE AND PEOPLE	
	This case has been widely reported in the national and local media. There is nothing wrong with having heard something about this case. It is important to answer all of the following questions truthfully and fully.
<u>33-34</u>	Before today, had you read, seen, or heard anything about Ms. Maxwell? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure
<u>33a3</u> <u>4a.</u>	If yes or unsure, please state what you remember hearing, and how or from whom you may have heard (e.g., a friend, the newspaper, a website, social media). If you heard about Ms. Maxwell from a media source, please identify the media source by name: _____ _____ _____ _____ _____ _____ _____ _____ _____ _____
<u>34-35</u>	Have you personally formed an opinion about Ms. Maxwell’s guilt or innocence of the crimes charged as a result of anything you have heard, read or seen? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> Not applicable, I have not read/seen/heard about Ms. Maxwell
<u>34a3</u> <u>5a.</u>	If yes or unsure, please summarize your opinion: _____ _____ _____ _____ _____ _____

Juror ID: _____

<p>35-36 35a3 6a.</p>	<p>Based on anything that you have read, seen, or heard about Ms. Maxwell, including anything about criminal charges against Ms. Maxwell, have you formed any opinions about Ms. Maxwell that might make it difficult for you to be a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> Not applicable, I have not read/seen/heard about Ms. Maxwell </p>
	<p>If yes or unsure, please explain why it might be difficult for you to be a fair and impartial juror in this case:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>36-37</p>	<p>Before today, had you read, seen, or heard anything about Jeffrey Epstein?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure </p>
<p>36a3 7a.</p>	<p>If yes or unsure, please state what you remember hearing, and how or from whom you may have heard (<i>e.g.</i>, a friend, the newspaper, a website, social media). If you heard about Mr. Epstein from a media source, please identify the media source by name:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>37-38</p>	<p>Have you verbally stated or posted your opinion on social media or online about Ms. Maxwell or Mr. Epstein?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable, I have not read/seen/heard about Mr. Epstein/Ms. Maxwell </p>
<p>37a3 8a.</p>	<p>If yes, when and where did you state or post your opinion?</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

<p><u>38-39</u></p>	<p>Based on anything that you have read, seen, or heard about Jeffrey Epstein, have you formed any opinions about Mr. Epstein that might make it difficult for you to be a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure </p> <p style="text-align: center;"> <input type="checkbox"/> Not applicable, I have not read/seen/heard about Mr. Epstein </p>
<p><u>38a3</u> <u>9a.</u></p>	<p>If yes or unsure, please explain why it might be difficult for you to be a fair and impartial juror in this case:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>39-40</u></p>	<p>If you have heard about Jeffrey Epstein, do you think Ms. Maxwell’s alleged association with Jeffrey Epstein will make it difficult for you to fairly and impartially consider the evidence presented at trial and render a verdict based solely on the evidence?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure </p> <p style="text-align: center;"> <input type="checkbox"/> Not applicable, I have not read/seen/heard about Ms. Maxwell and/or Jeffrey Epstein </p>
<p><u>39a4</u> <u>0a.</u></p>	<p>If yes or unsure, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>40-41</u></p>	<p>Based on anything you have read, seen, or heard about Ms. Maxwell, including anything about criminal charges brought against Ms. Maxwell, would you be able to follow the Court’s instruction to put that information out of your mind and decide this case based only on the evidence presented at trial?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure </p> <p style="text-align: center;"> <input type="checkbox"/> Not applicable, I have not read/seen/heard about Ms. Maxwell </p>

Juror ID: _____

<p><u>40a4</u> <u>1a.</u></p>	<p>If no or unsure, please explain:</p> <hr/> <hr/> <hr/> <hr/>
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NATURE OF CHARGES	
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<p><u>41.42</u></p>	<p>During the trial, you will hear evidence alleging sex crimes against underage girls. Some of the evidence in this case will involve sexually suggestive or sexually explicit conduct. Is there anything about the nature of this case and the accusations as summarized at the beginning of this questionnaire that might make it difficult for you to be a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
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<p><u>41a4</u> <u>2a.</u></p>	<p>If yes, please explain:</p> <hr/> <hr/> <hr/> <hr/> <hr/>
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<p><u>42.43</u></p>	<p>Do you have any specific views or feelings concerning laws regarding the age at which individuals can or cannot consent to sexual activity with other individuals that would affect your ability to serve as a fair and impartial juror?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
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<p><u>42a4</u> <u>3a.</u></p>	<p>If yes, please explain:</p> <hr/> <hr/> <hr/> <hr/>
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<p><u>43.44</u></p>	<p>Do you have any opinion about the enforcement of the federal sex trafficking laws or the federal laws concerning sex crimes against minors that might prevent you from being fair and impartial in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
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Juror ID: _____

<p>43a4 4a.</p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>44.45</p>	<p>Have you or a family member ever <u>supported</u>, lobbied, petitioned, <u>protested</u>, or worked in any other manner for or against any laws or, regulations, <u>or organizations</u> relating to sex trafficking, sex crimes against minors, or sex abuse generally, or sexual harassment?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>44a4 5a.</p>	<p>If yes, please explain when and what you or your family member did:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>44b4 5b.</p>	<p>If your answer to 4445 was yes, do you believe that this would affect your ability to serve fairly and impartially as a juror in this case?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>44e4 5c.</p>	<p>If yes to 44b45b, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>45.46</p>	<p>The witnesses in this case may include law enforcement witnesses. Would you have any difficulty assessing the credibility of a law enforcement officer just like you would any other witness?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>45a4 6a.</p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

<p><u>46-47</u></p>	<p>Witnesses in this case may testify claiming sexual abuse or sexual assault. Would you have any difficulty assessing the credibility of a witness claiming sexual assault or abuse just like you would any other witness?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>46a4</u> <u>7a.</u></p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>47-48</u></p>	<p>Have you or a friend or family member ever been the victim of sexual harassment, sexual abuse, or sexual assault? (This includes actual or attempted sexual assault or other unwanted sexual advance, including by a stranger, acquaintance, supervisor, teacher, or family member.)</p> <p style="text-align: center;"> <input type="checkbox"/> Yes (self) <input type="checkbox"/> Yes (friend or family member) <input type="checkbox"/> No </p>
<p><u>47a4</u> <u>8a.</u></p>	<p>If yes, <u>without listing names</u>, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>47b4</u> <u>8b.</u></p>	<p>If your answer to <u>4748</u> was yes, do you believe that this would affect your ability to serve fairly and impartially as a juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>47e4</u> <u>8c.</u></p>	<p>If yes to <u>47b48b</u>, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

<p><u>48-49</u></p>	<p>Have you or a friend or family member ever been accused of sexual harassment, sexual abuse, or sexual assault? (This includes both formal accusations in a court of law or informal accusations in a social or work setting of actual or attempted sexual assault or other unwanted sexual advance, including by a stranger, acquaintance, supervisor, teacher, or family member.)</p> <p style="text-align: center;"> <input type="checkbox"/> Yes (self) <input type="checkbox"/> Yes (friend or family member) <input type="checkbox"/> No </p>
<p><u>48a4</u> <u>9a.</u></p>	<p>If yes, <u>without listing names</u>, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>48b4</u> <u>9b.</u></p>	<p>If your answer to <u>4849</u> was yes, do you believe that this would affect your ability to serve fairly and impartially as a juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>48c4</u> <u>9c.</u></p>	<p>If yes to <u>48b49b</u>, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><u>49-50</u></p>	<p>Is there any other experience that you or anyone close to you has had that may affect your ability to serve fairly and impartially as a juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p><u>49a5</u> <u>0a.</u></p>	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

CLOSING QUESTION	
<u>50-51</u>	<p>Do you wish for any particular answers to remain confidential and to not go beyond the Judge, counsel, and the Defendant, because the answer would embarrass you or otherwise seriously compromise your privacy?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please list which question number(s):</p> <hr/> <hr/>

Juror ID: _____

DECLARATION

I, Juror Number ____ 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.

Signed this ____ day of November, 2021

DO NOT WRITE YOUR NAME. PLEASE SIGN USING YOUR JUROR NUMBER.

Juror ID: _____

DRAFT – October 20, 2021

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
: UNITED STATES OF AMERICA :
: :
: - v. - : S2 20 Cr. 330 (AJN)
: GHISLAINE MAXWELL, :
: :
: Defendant. :
-----X

[DRAFT] EXAMINATION OF PROSPECTIVE JURORS

Introduction

[PLACEHOLDER FOR INTRODUCTORY REMARKS]

INDIVIDUAL QUESTIONS

Ability to Follow Instructions

1. As I instructed you earlier, one of the important principles of criminal law is that a defendant in a criminal case is presumed to be innocent. Like anyone accused of a crime in this country, Ms. Maxwell is, and must be, presumed innocent of any and all charges made against her unless and until the Government proves her guilt beyond a reasonable doubt. It is the Government's burden to prove guilt beyond a reasonable doubt and the Government's burden of proof alone. The defendant has no burden to prove her innocence or to present any evidence. Are you able to follow these instructions?
2. As I instructed you earlier, until you are excused from this case, you may not read, listen to, or watch any accounts of this case reported on television, the radio, or over the Internet or social media. Jurors are also not allowed to do any research regarding this case, whether over the Internet, on social media, or in any other manner. The case must be decided solely on the basis of the evidence presented in the courtroom. Would you have any difficulty following these rules, which are binding on every juror?
3. When you filled out your questionnaire, you were told not to research, read, or watch anything about the case or learn anything about the case. Have you, even though you were instructed not to do that, done that anyway? Have you looked things up on the internet, even if you just Googled it? If you have, now is the time to tell me.

General Ability to Serve

4. On your questionnaire, you stated that you do not have any unmovable commitments between November 29 and approximately January 15. Does that continue to be accurate?

Prior Knowledge of Ms. Maxwell

5. [If Juror HAS HEARD of Ms. Maxwell] In your questionnaire, you reported that you had heard of Ms. Maxwell before starting this process. Have you formed an opinion or heard, read, or seen anything about Ms. Maxwell that might make it difficult for you to be a fair and impartial juror in this case?
6. [If Juror HAS NOT heard of Ms. Maxwell] In your questionnaire, you reported that you had not heard of Ms. Maxwell before starting this process. Is that accurate?

Prior Knowledge of Jeffrey Epstein

7. [If Juror HAS HEARD of Epstein] In your questionnaire, you reported that you had heard of Jeffrey Epstein before starting this process. Have you formed an opinion or heard, read, or seen anything about Mr. Epstein that might make it difficult for you to be a fair and impartial juror in this case?
8. [If Juror HAS NOT heard of Epstein] In your questionnaire, you reported that you had not heard of Jeffrey Epstein before starting this process. Is that accurate?

Nature of Charges

9. You reported in your questionnaire that [insert question number of any YES answers for question 47, 48, or 49]. Would that experience affect your ability to serve as a fair and impartial juror in this case?

Knowledge of the Trial Participants

10. In the questionnaire I listed the names of all the trial participants and you indicated that you did not know any of those individuals by name. I'll ask you to also look around now and let me know if you recognize anyone in the courtroom.
11. I will now read a list of individuals who may be mentioned during the trial, or who may be witnesses in this case:

[Names to be supplied]

Do you know any of those people? Have you had any dealings, directly or indirectly, with any of these individuals? To your knowledge, have any of your relatives, friends, or associates had any dealings with any of these individuals?

Knowledge of Location

12. Events in this case are alleged to have taken place at the following locations:

[List to be supplied]

Are you particularly familiar with any of those locations?

Prior Jury Service

13. [For jurors who answered YES to question 17] On your questionnaire you said that you have served as a juror. In what court did you serve and was it a civil or criminal case? What type of case was it? Without telling us what the verdict was, did the jury reach a verdict?
14. [For jurors who answered YES to question 18] On your questionnaire you said that you have served as a grand juror. When and where?

15. [For jurors who answered YES to either question] Is there anything about your prior experiences as a juror that would prevent you from acting as a fair and impartial juror in this case?

Relationship with, and View of, Government, Defense, and Others

16. Have you, either through any experience you have had or anything you have seen or read, developed any bias or prejudice or other feelings for or against the United States Department of Justice, the United States Attorney's Office for the Southern District of New York, the FBI, or the NYPD?
17. Do you have any opinions about prosecutors or criminal defense attorneys generally that might make it difficult for you to be a fair and impartial juror in this case?
18. Do you have any opinion about the criminal justice system generally or the federal criminal justice system in particular that might make it difficult for you to be a fair and impartial juror in this case?
19. Do you have any opinion about people who are wealthy or have luxurious lifestyles that might make it difficult for you to be a fair and impartial juror in this case?

Experience as a Witness, Defendant, or Crime Victim

20. [For jurors who answered YES to question 19] On your questionnaire you said that [you or a friend/family member] has/have participated in a state or federal court case. What kind of case? And, what was your/their role in that case? Is there anything about that experience that would prevent you from acting as a fair and impartial juror in this case?

21. [For jurors who answered YES to question 24] On your questionnaire you said that [you or a friend/family member] has/have been a victim of a crime. Please describe the circumstances, including the type of crime, when it happened, and the outcome of any law enforcement action. Is there anything about that experience that could affect your ability to be fair and impartial in this case?

Juror's Background

22. How old are you?

23. Please state your current county of residence and list each county of residence during the past ten years.

24. How far did you go in school? And what did you study?

25. If you work, what kind of work do you do? Describe the type of your employer (for example, a private company, government entity, non-profit organization, etc). (If retired or unemployed, describe your last employment.)

26. How long have you been employed in your current position? What work did you previously do?

27. Who are the members of your household?

28. If the members of your household work, what kind of work do they do?

29. What newspapers or magazines do you typically read and how often?

30. Do you typically read any websites? If so, do you post comments or information on these websites?

31. Do you regularly use social media? If so, what social media do you regularly use?

32. Do you regularly watch any television shows? If so, what shows?

33. Do you regularly listen to any radio programs or podcasts? If so, which?

34. What are your hobbies, major interests, recreational pastimes, and leisure-time activities?
35. Have you ever followed a criminal case in the media? If so, what case?
36. Are you a member of any clubs or organizations to which you contribute time or money?

FINAL QUESTION

37. I have tried to direct your attention in these questions and through the questionnaire you filled out to possible reasons why you might not be able to sit as a fair and impartial juror. Apart from any prior question, do you have the slightest doubt in your mind, for any reason whatsoever, that you will be able to serve conscientiously, fairly, and impartially in this case and to render a true and just verdict without fear, favor, sympathy, or prejudice, and according to the law as it will be explained?