UNITED STATES DISTRICT COURT DISTRICT OF OREGON

CONFIDENTIAL JUROR QUESTIONNAIRE

DEAR PROSPECTIVE JUROR:

You have been summoned by this Court for jury service in a federal criminal case titled *United States v. Tony Daniel Klein*. The Court instructs you not to discuss this case or your answers to this questionnaire with anyone, including your family or fellow jurors. It is important to the fairness of this process that you do not engage in any research, such as searching for stories on the internet or social media about this case or anything to do with it. You must not read or listen to any media accounts, whether in a newspaper, on the internet, on television, or on the radio. Do not discuss or post anything about this case on any electronic or social media, including Facebook, YouTube, Twitter, Reddit, Instagram, LinkedIn, Snapchat, TikTok, email, text message, any blog, website or chat forum, or any other media. You must not let anyone, including family, friends, news media, parties, or witnesses, speak with you about your views or any aspect of this case, including your answers to this questionnaire, unless and until the Court has permitted or instructed you to do so.

In this case, the Government has charged the defendant, Tony Daniel Klein, in a 25-count indictment. The indictment charges Mr. Klein with 21 counts of violating 18 U.S.C. § 242, alleging that he sexually assaulted 12 female inmates at the Coffee Creek Correctional Facility (CCCF) in Oregon while employed as a corrections nurse. The indictment also charges Mr. Klein with four counts of violating 18 U.S.C. § 1623, alleging that he falsely denied engaging in various sexual conduct with any incarcerated woman while employed by CCCF. The charges are only allegations; they are not evidence. The defendant has pleaded not guilty to all charges and is presumed innocent. It will be the responsibility of the government, through a jury trial, to prove these charges beyond a reasonable doubt.

As part of the jury selection process, you must complete this juror questionnaire. Your answers to the questions on this form will assist the Court and the attorneys in the jury selection process for this trial. This questionnaire is designed to obtain information about your background as it relates to your service as an unbiased, fair, and impartial juror in this case. Unless a question states otherwise, the fact that a particular question is asked does not imply that the subject matter of the question will be an issue in this case. As you read the questions, you are not to draw any

inferences about the issues that must be decided by the jury in this matter. The questions are not meant to invade your privacy but only to help select a fair and impartial jury for this trial.

If there is any reason why you might not be able to give all parties (the government and the defendant) a fair trial in this case, it is important that you say so now. Please answer each question as fully as you can. Your complete honesty is essential to the fairness of this process. Do not leave any question blank. If a question does not apply to you, write "N/A" ("not applicable"), rather than leaving the answer blank. If you do not understand a question, please state that in the space for the answer. If you feel that an answer would be too personal, please say so in the space provided. You will have the opportunity to discuss your answers privately. If you need more space for any response to a question, please use the extra sheet attached at the end of the questionnaire. If you use the extra sheet, please clearly indicate which numbered question (or questions) you are answering.

The purpose of this questionnaire is to determine whether, if you are selected as a juror in this case, you could fairly and impartially decide this matter based solely on the evidence that will be presented at trial and the instructions about the law that will be given to the jury by the Court. The Court and the lawyers understand that every person has beliefs and biases concerning many things. You should answer with your honest feelings, whatever they may be. Do not assume that any of your answers will qualify or disqualify you from serving on this jury.

Your answers to this questionnaire are confidential, and the Court is sensitive to your privacy. Your responses will be reviewed by the Judge and the lawyers in this case, and your privacy will be maintained. After a jury has been selected, the original questionnaire will be returned to the Clerk of the Court and kept under seal, and it will only be disclosed, if at all, with names and other identifying information removed.

Upon completion, please sign your name on the last page where indicated. You are expected to sign your questionnaire, and your answers will be given the same effect as a statement given to the Court under oath. Thank you for your cooperation and assistance in this important matter.

Michael H. Simon United States District Judge District of Oregon

JUROR QUESTIONNAIRE

1.	Full Name:	Participant No. 21
2.	Age:	
3.	Preferred Pronoun and Gender Identity:	
4.	City or Community you currently live in:	
5.	How long have you lived in your current city or	community?
6.	What is your racial and ethnic background?	
7.	It is difficult to predict the length of any trial, be complete. Trial generally is held Monday through with mid-morning, mid-afternoon, and lunchtime	gh Friday, from 9:00 a.m. to 5:00 p.m.
	Unless waived by a juror, a juror receives a dail first ten days of service, followed by \$60 per da reimburse mileage at \$0.655 per mile and \$18 p parking expenses). If a juror lives 75 or more m be considered a long-distance juror and information been included with that juror's summons.	by thereafter. The Court may also per day for parking (upon certification of illes from the courthouse, that juror may
	Do you have any extraordinary personal, emplo impose a serious burden or hardship on you suc impossible for you to serve as a juror in this cas	h that it would be extremely difficult or
	☐ Yes ☐ No	
	If "Yes," please explain:	

8.	Do you have any physical or mental health issues that would make it difficult for you to serve as a juror in this case? Also, do you have any difficulty seeing, reading English, understanding spoken English, or concentrating?
	□ Yes □ No
	If "Yes," please explain:
9.	Is there anything else going on in your life or work that would prevent you from giving this case your full attention for the duration of the trial?
	□ Yes □ No
	If "Yes," please explain:
10.	Will your employer continue to pay your salary if you are selected to serve on this jury?
	☐ Yes ☐ No ☐ Not Sure ☐ I do not have an employer
11.	Which of the following best describes your living situation?
	☐ Own Home ☐ Own Apartment/Condo ☐ Own Mobile Home ☐ Rent Home
	☐ Rent Apartment ☐ Rent Room ☐ Other:
12.	What is your current relationship status? Are you:
	☐ Single ☐ Never married ☐ Living with someone ☐ Divorced ☐ Widowed
	☐ Married ☐ Previously divorced ☐ Currently separated ☐ Other:

13.	For those persons who live in your household, please tell us their name, age, relationship
	to you, and occupation (if any):

Name	Age	Relationship to You	Occupation

14.	What is the highest level of education that y	ou have completed?
	☐ Middle School ☐ High Scho	ol
	☐ Technical or Vocational School	
	Major/Degree	School Attended
	☐ 1-2 Years College	
	Major/Degree	School Attended
	☐ 4 Years College	
	Major/Degree	School Attended
	☐ Graduate School	
	Major/Degree	School Attended
15.	Have you ever studied law, obtained a law of	legree, or received legal training?
	□ Yes □ No	
	If "Yes," please explain.	
16.	Have you ever studied medicine or nursing, received medical training?	obtained a medical or nursing degree, or
	☐ Yes ☐ No	

If "Yes," please explain.		
Have you ever served in a the military reserves, Nati		forces of the United States (including Yes No
If yes, please list the bran served in the military poli		ce and date of service, and if you ever ary court system:
What do you consider to	be your primary emplo	yment status? (Check only one).
☐ Employed full-time	☐ Retired	☐ Homemaker
☐ Employed part-time	Disability	* *
☐ Self-employed	☐ Unemployed	☐ Other
Dates of Employment	Job Title	Employer
years), please list each of (including self-employme	the jobs that your spouse ant or homemaker), begin	use or partner within the past ten e or partner has had in the past ten yearning with the current or most recent ecupations for the 10 years prior to the
years), please list each of (including self-employment employment. If they are retirement.	the jobs that your spouse ant or homemaker), begin	e or partner has had in the past ten yearning with the current or most recent
years), please list each of (including self-employme employment. If they are re	the jobs that your spouse ent or homemaker), begin etired, please list their oc	e or partner has had in the past ten yearning with the current or most recent ecupations for the 10 years prior to the
years), please list each of (including self-employment employment. If they are retirement.	the jobs that your spouse ent or homemaker), begin etired, please list their oc	e or partner has had in the past ten yearning with the current or most recent ecupations for the 10 years prior to the
years), please list each of (including self-employment employment. If they are retirement.	the jobs that your spouse ent or homemaker), begin etired, please list their oc	e or partner has had in the past ten year uning with the current or most recent ecupations for the 10 years prior to the
years), please list each of (including self-employment employment. If they are retirement.	the jobs that your spouse ent or homemaker), begin etired, please list their oc	e or partner has had in the past ten yearning with the current or most recent ecupations for the 10 years prior to the

21.	Have you, a family member, or anyone close to you ever worked for, volunteered in,
	or ever otherwise been affiliated with any local, state, or federal law enforcement
	agency? These agencies may include local or state police, local or county jails, local
	or federal corrections, City Attorney's Office, District Attorney's Office, Attorney
	General's Office, County Sheriff's Office, United States Attorney's Office, Federal
	Bureau of Investigation, Bureau of Alcohol Tobacco Firearms and Explosives, Drug
	Enforcement Agency, U.S. Marshals Service, Homeland Security, Immigration and
	Customs Enforcement, IRS, etc.)?

If yes, please indicate below the person, the job, dates of employment, location, and the name of the law enforcement agency.

Person	Job	Dates of Employment	Location	Agency Name

22.	Have you or anyone in your immediate family ever been accused of wrongdoing at work?
	If so, please explain the nature of the accusation and whether you feel they were treated
	fairly.

☐ Yes ☐ No

If "Yes," please explain:

23. Have you, a close family member, or friend ever been employed by anyone involved in criminal defense work, such as with private attorneys, public defenders, or private investigators?

If "Yes," please indicate the person, job, dates, location and employer name.

Person	Job	Dates of Employment	Location	Employer

24.	Have you, any field?	family members,	or anyone el	se close to y	you ever worked in the	medical
	☐ Yes ☐ No)				
	If "Yes," pleas	se explain:				
25.	How would yo justice system		eelings about	the following	ng members of the crin	ninal
FBI: Defense Defende Expert Federa Judges	Witnesses: l government: /Court Staff:	 □ Very positive 	☐ Positive	□ Neutral□ Neutral□ Neutral□ Neutral□ Neutral□ Neutral	□ Negative □ Very n very negative) in more	negative negative negative negative negative negative
26.	=	as any member of with the Oregon D	-		ever been employed, or s?	sought
	☐ Yes ☐ No)				
	If "Yes," please explain, and include whether it is yourself or someone in your family, where they were employed (or sought employment), the dates of that employment, and whether they are still working there. If the person is not still working there, please explain why.					

27.	Do you belong to or are otherwise affiliated with any community, civic, social, union, professional, fraternal, political, religious, or recreational organizations (examples might include PTA, Kiwanis, Rotary Club, American Legion, NRA, VFW, Masonic Orders, Knights of Columbus, Political Action Committees, etc.)?				
	□ Yes □ No				
	If "Yes," please list which o	ones:			
	Have you held any offices or positions of leadership in any of these organizations?				
	□ Yes □ No				
	If "Yes," please describe:				
	Do you contribute money or services to any of these organizations?				
	□ Yes □ No				
	If "Yes," which ones:				
28.	From which sources do you most often get your news (e.g., Fox News, NPR, New York Times, Yahoo News, The Oregonian, OPB, Facebook, Breitbart, podcasts, etc.)?				
	☐ Newspapers	Which one(s)?			
	☐ Local television news	Which station(s)?			
	☐ Cable News	Which network(s)?			
	☐ Social media/Internet	Which site(s)?			
	☐ Radio	Which station(s)?			
	☐ Podcast	Which one(s?)			
	☐ Friends/Word of Mouth				
	☐ I don't follow the news				
29.	What three internet websites	s do you most frequently visit?			

30.	If you have a car, does it have any bumper stickers or magnets?
	□ Yes □ No
	If "Yes," what do they say or show?
31.	Please name a famous person whom you admire and explain why. (Please select an individual whom others likely would know.)
32.	Have you ever followed media or press reports of a criminal case on television, radio, in print, and/or over the internet?
	□ Yes □ No
	If "Yes," which case(s) did you follow and why?
33.	Do you watch TV programs that show real-life or dramatized police, prison, or legal activities (for example, "Law and Order: SVU," "CSI," "FBI," "Orange is the New Black," "Love after Lockup," etc.)? ☐ Yes ☐ No
	If "Yes," which shows do you watch? How often?
34.	Have you ever served on a jury before?
	□ Yes □ No
	If "Yes," did you serve on: □ a criminal case? □ a civil case? □ a grand jury?

	Have you ever served as the Presiding Juror (Foreperson) of a jury?
	□ Yes □ No
	Did your jury (or juries) reach a verdict?
	□ Yes □ No
	If you recall, what issues, claims, or charges were presented in any trial or trials in which you previously served as a juror?
35.	Have you ever been a witness in a civil or criminal case in state or federal court?
	□ Yes □ No
	If "Yes," please briefly describe the case, your role, and the outcome.
36.	Have you or any member of your family ever been a party (either a plaintiff or a defendant) in a civil case in either state court or federal court?
	□ Yes □ No
	If "Yes," please describe the case, your role, and the outcome of the case.
37.	Have you, a close family member, or a close friend ever been a party to any legal action or proceeding involving the United States, its officers, agents, or employees?
	□ Yes □ No
	If "Yes," please explain:

38.	To the best of your knowledge, have you, any family members, or anyone else close to you ever been the victim of a crime? (Examples may include assault, identity theft, carjacking, fraud, etc.).
	☐ Yes ☐ No If "Yes," please explain (including the person's relationship to you, approximately when and where the crime occurred, the nature of the crime, and the outcome of any prosecution).
	Do you believe the victim was treated fairly?
	□ Yes □ No
	If "No," please explain:
	Whether or not a perpetrator was caught, were you satisfied with the conduct of the police investigation?
	□ Yes □ No
	If "No," please explain:
	Please describe what, if anything, about your experience with the legal process in this context you would like to see changed or wish had been done differently.
	Would this experience interfere with or in any way influence your ability to reach an impartial verdict based only on the evidence in this case and the law as instructed by the Judge?
	□ Yes □ No
	If "Yes," please explain:

39.	Have you, any family members, or anyone close to you ever been the subject of a criminal investigation, charged with a crime, or convicted of a crime? (Do not include traffic tickets or citations).
	□ Yes □ No
	If "Yes," please describe the nature of the investigation/charges, whether charges were brought, whether there was a conviction, and whether there was any sentence imposed.
	Do you believe the subject of the investigation was treated fairly?
	□ Yes □ No
	If "No," please explain:
	Were you satisfied with the conduct of police or other law enforcement involved in the matter, including the prosecutors?
	□ Yes □ No
	If "No," please explain:
	Please describe what, if anything, about your experience with the legal process in this context you would like to see changed or wish had been done differently.
	Would this experience interfere with or in any way influence your ability to reach an impartial verdict based only on the evidence in this case and the law as instructed by the Judge?
	□ Yes □ No
	If "Yes," please explain:

40.	Is any department or agency of the United States government currently asserting a claim against you or any family member or close friend?
	☐ Yes ☐ No
	If "Yes," please explain:
41.	If seated as a juror in this trial, you will hear words and phrases, including slang terms, related to body parts, such as "penis," "vagina," and "breast," and terms related to sexual acts, such as "blow job" or "fingering." Is there anything about hearing such terms that would make it difficult for you to pay attention to the evidence in this case?
	□ Yes □ No
	If "Yes," please explain:
42.	The alleged victims and some of the witnesses in this case have been convicted of crimes and have served time in prison. Others may have pending criminal charges. What are your opinions, generally, about people with criminal convictions, who have been incarcerated, or have pending criminal charges? What, if anything, do you believe is important to know when considering their testimony?
43.	What are your opinions about people with drug or alcohol addictions? What, if anything, do you believe is important to know when considering the testimony of these individuals?

44.			ealth conditions, such as bipolar disorder or self, someone in your family, or someone who
	☐ Yes ☐ No		
	If "Yes," please expla	ain:	
	What are your opinio	ons about people with n	nental health conditions?
45.	-	-	w enforcement or in a prison are more likely, compared to witnesses who do not work in
	☐ More Likely Please explain:	☐ Less Likely	□ Equally Likely
46.	therapist, dentist, etc.	-	medical field (for example, doctor, nurse, likely, or equally likely to tell the truth, the medical field?
	☐ More Likely	☐ Less Likely	☐ Equally Likely
	Please explain:		

47.	Have you or has any member of your family ever been sexually assaulted or sexually harassed, whether reported or not?
	□ Yes □ No
	If "Yes," please identify whether it was yourself or someone in your family.
48.	Have you or has any member of your family ever reported someone else for committing sexual assault or sexual harassment?
	□ Yes □ No
	If "Yes," please explain your or your family member's experience reporting. Is there anything you would like to have changed about that experience or wish had been done differently?
49.	Have you or has any member of your family ever been accused of sexual assault or sexual harassment?
	□ Yes □ No
	If "Yes," please explain. Is there anything you would like to have changed about that experience or wish had been done differently?

50.	Have you or any member of your family ever been <i>falsely</i> accused of sexual assault or sexual harassment?				
	□ Yes □ No				
	If "Yes," please explain. Is there anything you would like to have changed about that experience or wish had been done differently?				
51.	Have you or has any member of your family ever participated as a party in a civil lawsuit seeking damages for sexual harassment, sexual abuse, or a sexual assault?				
	□ Yes □ No				
	If "Yes," please explain.				
52.	During the past few years, the "Me Too" movement has sparked a national debate on sexual assault and harassment. Some people feel that the "Me Too" movement has been a good thing because it has raised awareness about a problem in society and has increased accountability. Other people feel that many people accused of sexual harassment or sexual assault these days are being targeted for the purpose of revenge or financial gain. What are your thoughts about this issue?				

53.	harassm	nent are loc	eve that individuals who file lawsuits relating to sexual assault or oking for a handout, while others believe that those who are assaulted or ed to financial compensation for abuse. What are your thoughts on this
54.	in Oreg	on prisons	heard anything about this case or accusations about sexual misconduct from any sources (for example, television, newspaper, radio, books, personal knowledge, or conversations)?
	☐ Yes	□ No	
		-	If the above, please describe what you have seen, heard, or read about also share any opinions you have heard anyone express about this
55.	Do you Klein? □ Yes		ave you seen or heard anything about the Defendant, Tony Daniel
	If "Yes,"	please exp	lain:
56.	Do you k	now any o	f the attorneys associated with this case"
	☐ Yes	□ No	Cameron A. Bell
	☐ Yes	□ No	Gavin W. Bruce
	☐ Yes	□ No	Kristen Clarke
	☐ Yes	□ No	Hannah Horsley
	☐ Yes	□ No	Matthew McHenry

	☐ Yes	□ No	Amanda Thibeault
	☐ Yes	□ No	Natalie K. Wight
	If "Yes,"	" please expla	ain:
57.	law firms,	-	who works for, or has worked at, any of the following businesses, ties? (Check all that apply. Do <u>not</u> do any research or investigation there.)
	☐ Yes	□ No	United States Attorney's Office
	☐ Yes	□ No	United States Department of Justice
	☐ Yes	□ No	Federal Bureau of Investigation (FBI)
	☐ Yes	□ No	Levine & McHenry LLC
	☐ Yes	□ No	Alvarez Thibeault LLC
	If "Yes,"	" please expla	ain how you know that person:
58.	-	all that apply.	the following people who may testify as a witness in this case?) (Do <u>not</u> do any research or investigation on the internet or
	☐ Yes	□ No	Ackerman, Caryn
	☐ Yes	□ No	Alleyne, Constantine
	☐ Yes	□ No	Armitage, Wendy
	☐ Yes	□ No	Becker, Erik
	☐ Yes	□ No	Bowditch, Elizabeth
	☐ Yes	□ No	Bowman, Dave
	☐ Yes	□ No	Brash, Mike
	☐ Yes	□ No	Bruns, Alana
	☐ Yes	□ No	Card, Jordan
	□ Ves	□ No	Childress Ed

Yes	□ No	De La O, Karin
Yes	□ No	Drew, Chad
Yes	□ No	Dumond, Robert W.
Yes	□ No	Greiner Flindt, Erin
Yes	□ No	Hannon, Teresa
Yes	□ No	Haynes, Scott
Yes	□ No	Hiser, Eric
Yes	□ No	Koznek, Dane
Yes	□ No	Lamb, Roslyn
Yes	□ No	Martin, Katherine
Yes	□ No	McKay, Sydney
Yes	□ No	Merten, Marie
Yes	□ No	Noack, Lindsay
Yes	□ No	Orr, Jacqueline
Yes	□ No	Pries, Christina
Yes	□ No	Riggs, Lewis
Yes	□ No	Russo, Kristina
Yes	□ No	Sabin, Liz
Yes	□ No	Sage, Ericka
Yes	□ No	Schain, Lori
Yes	□ No	Shockey, Thomas
Yes	□ No	Springer, Linda
Yes	□ No	Van Pelt, Raymond
Yes	□ No	Ward, Marylou
Yes	□ No	Wilkins, Leah
Yes	□ No	Wolery, Cally

59.	U.S. District Judge Michael H. Simon is expected to preside over this trial. His Courtroom Deputy is Ms. Mary Austad. His Court Reporter is Mr. Dennis Apodaca. Do you know Judge Simon or any members of his staff?
	□ Yes □ No
	If "Yes," please explain:
60.	As a juror, it is important to the fairness of this process that you do not obtain any information about this case outside of the courtroom. The Court will instruct the jury that the jury may not read, watch, or listen to any news or media accounts or commentary about the case or anything to do with it; may not do any factual or legal research about anything related to the case, such as consulting dictionaries, searching the internet, or using other reference materials; and may not investigate or in any other way try to learn on their own about the case or the people involved, including the parties, the witnesses, or the lawyers. If a juror happens to read, see, hear, or learn anything about this case, the juror must turn away and report that contact to the Court as soon as possible. If you are selected to be a juror in this case, will you be able to follow this instruction?
	□ Yes □ No
	If "No," please explain.
61.	If you are selected to serve on the jury for this case, will you be able to render a verdict (a) solely on the evidence presented at trial, (b) in accordance with the Court's instructions on the law, (c) disregarding any other ideas, notions, or beliefs about the law that you may have encountered, and (d) not based on sympathy or any other impermissible bias?
	□ Yes □ No
	If "No," please explain.

If you said "Yes" to anyone listed above, please explain how you know that person.

62.	Is there anything about the subject matter of this case, the parties, or anything mentioned in this questionnaire, or any matter not covered in this questionnaire, that creates a question in your mind as to whether you can be a fair, objective, and impartial juror in this case?
	□ Yes □ No
	If "Yes," please explain.
63.	Do you have any religious, philosophical, or other beliefs that would make it difficult for you to be a juror in this case, or that would prevent you from sitting in judgment of another individual?
	□ Yes □ No
	If "Yes," please describe:
64.	If there is anything not covered by this questionnaire that you think the judge or attorney might want to know when considering you as a juror in this case, please explain below.
65.	Is there any matter that you would like to discuss privately with the Judge and the parties? ☐ Yes ☐ No
	If "Yes," please identify the topic:
66.	Did you have any difficulty reading or understanding this questionnaire?
	□ Yes □ No
	If "Yes," please explain.

67.	Did anyone assist you in completing this questionnaire?
	□ Yes □ No
	If "Yes," please explain.
	JUROR OATH AND SIGNATURE
	I hereby state under penalty of perjury that all answers given by me in this Juror Questionnaire are true, correct, and complete to the best of my knowledge.
	Because I am a potential juror in this case, I agree not to do any research, investigation, or reading on either the internet or anywhere else that may relate to any of the issues or names mentioned in this questionnaire. I also agree not to discuss anything about this case, share any information about this case, or even listen to anyone about this case unless I am expressly instructed or permitted to do so by the Judge.
	I understand that if I am called to the federal courthouse for jury selection in this case, I will be questioned under oath about my compliance with these instructions.
	I also understand that I am expected to advise the Judge right away if I become aware of any violation of any of these instructions, whether deliberate or accidental.
	DATE:
	Juror's Signature
	Juror's Printed Name

EXPLANATION SHEET

If you were unable to answer sufficiently any question in the spaces provided, please indicate the
question number(s) and use this area to provide that additional information. Thank you very
much for your cooperation.
Question No