## **United States v. Sadequee: Jury Questionnaire**

Hon. William S. Duffey, Jr. Northern District of Georgia September 29, 2008

The following questionnaire was prepared by the Northern District of Georgia's United States District Judge William S. Duffey, Jr., to facilitate jury selection in a terrorism prosecution, *United States v. Sadequee*, No. 1:06-cr-147 (N.D. Ga. Mar. 23, 2006). The questionnaire was prepared in collaboration with attorneys for both sides. After prospective jurors filled it out and before follow-up voir dire began, the defendant elected to represent himself.

The questionnaire is presented in two parts so that some questions are answered before prospective jurors know much about the case on which they may serve.

## **Jury Questionnaire Part 1**

You are part of the panel of prospective jurors for the above-listed case. To make the jury selection process more efficient and effective for everyone, you will be completing the following questionnaire. It is designed to elicit from you information that will assist the prosecution and the defense in making important decisions as to which of you will serve as jurors during the trial. Your answers will remain confidential and under seal; they will be used only by the Judge and the parties to select a qualified and impartial jury.

Do not discuss the questions or your answers with friends, family members, or fellow panelists. It is important that your answers are yours and yours alone. The questions are not meant to be intrusive, but you will be asked about some personal matters. Your answers will help the Judge, the Government, and the Defendant select the best jury possible in a way that respects your time and privacy. After a jury has been selected, all copies of your responses to this questionnaire will be returned to the Clerk of the Court and kept in confidence and under seal. The parties are under orders to maintain the confidentiality of any information they learn in the course of reviewing these questionnaires and discussing them with you.

Please write your juror number on every page in the blank provided.

Please print your answer to each question as *legibly*, *completely*, *and accurately* as you can. Please answer every question, and do not leave any question blank. If the question does not apply to you, write "N/A" for not applicable. If there is something you would like to discuss privately with the Judge and the lawyers, and not in front of the other jurors, please note this in your answer to the question or questions causing you concern.

Juror No.
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You must sign your questionnaire; your answers will be given the same effect as a statement given to the Court. What is needed is your very best, honest effort to answer all of the questions contained in this questionnaire. You should not disclose to anyone else the fact that you have been summoned for this case. You should avoid learning anything about the case through the media, on-line research, or otherwise between now and the conclusion of the jury selection process. You should not discuss this case, its subject matter, or this questionnaire with anyone, including those family members closest to you.

Thank you for your time and candor.

1.	Name (first, middle, last):
2.	Maiden Name:
3.	Gender:
4.	Age:
5.	City and County of Residence:
	If Atlanta, list neighborhood or area:
6.	How long have you lived at your current address?
7.	List other cities in which you have lived during the past 10 years:
8.	What is your ethnic background?
8.	
	White/Caucasian, not Hispanic
	Black/African-American, not Hispanic
	Hispanic/Latino
	Asian or South Asian American Indian or Native American
	Other:
	(please specify)
9.	City, state, and country of birth:
	If you were not born in the United States, when did you become a citizen?

	Juror No
10.	Are you able to read, write, and understand the English language without any difficulty?
	Yes No If no, please explain:
11.	Is English your first language?
	Yes No
12.	What other languages do you speak, read, or understand?
13.	What is your educational background? (Answer all that apply to you)  Grade school or less Some high school Technical or business school Graduated from high school at Some college at Graduated from college at with a degree in
	Completed graduate school at with a degree in
14.	Have you or any member of your immediate family had any legal training or studied law, including by participating in a paralegal program or through on-the-job training? (Note: For the purposes of this questionnaire, the term "immediate family" includes a spouse, domestic partner, father, mother, sister, brother, daughter, or son.)
	Yes No If yes, please describe:

		Juror No
15.	Current (or most recent) employment status (chec	k <b>all</b> that apply):
	Self-employed Work full-time Work part-time Homemaker for years Student for years; currently at Disabled and unable to work for years Unemployed/laid off for years or Retired for years Other:	ars months
16.	Where do you work now?	
17.	Describe your current job and what you do:	
18.	List other jobs you have had in the past 10 years:	
19.	Have you ever owned or managed your own busing	ness?
	Yes No	
20.	Do you supervise others in your current job or in j	previous jobs?
	Yes No If so, how many?	
21.	Are you: Single Married	Domestic Partner
	Separated Divorced	Widowed
22.	Your spouse or domestic partner's name:	
23.	Your spouse or domestic partner's city, state, and	country of birth:
24.	Your spouse or domestic partner's current occupa	tion:

		Juror No
25.	You	or spouse or domestic partner's occupations in the past 10 years:
26.	You	ur spouse or domestic partner's educational background:
27.		nere are any additional adults living in your household, please tell us at type of work they do (or school they attend), and their relationship to ::
28.	Do	you have children?
	Yes	s No
	If y	es, how many?
29.	old	pplicable, please complete the following for your children over 18 years (for more than four children, provide the requested information on the k of this page):
	a.	First Child: Gender: Age: School Attending: Current Employment:
	b.	Second Child: Gender: Age: School Attending: Current Employment:
	c.	Third Child: Gender: Age: School Attending: Current Employment:
	d.	Fourth Child: Gender: Age: School Attending: Current Employment:

		Juror No
30.	Hav	ve you served in the military?
	Yes	No
	a.	If yes, which branch?
	b.	What were your dates of service?
	c.	What was your rank at discharge?
	d.	Were you honorably discharged?
	e.	Were you ever deployed to a war or combat zone?
		Yes No
		If yes, please describe where, when, and your role:
31.	Has	an immediate family member served in the military?
	Yes	No If yes, who?
	a.	If yes, which branch?
	b.	What were their dates of service?
	c.	What was their rank at discharge?
	d.	Were they ever deployed to a war or combat zone?
		Yes No
		If yes, please describe where, when, and their role:

		Juror No.
32.		e you or any members of your immediate family ever worked for a l, state, or federal government, including any law enforcement agency?
	Yes	No
	a.	If yes, who?
	b.	What was the job?
	c.	Are you or your family members still working in this position, and, if not, when was the last time the person held this position?
33.		e you ever been involved in a lawsuit (other than a divorce case)? No
	a.	How many lawsuits have you been involved in?
	b.	Were you the plaintiff?
	c.	Were you the defendant?
	d.	What was the nature of the suit or suits?
	e.	Were you satisfied with the results, and, if not, why?

		Juror No
34.	Hav	e you ever served as a trial juror?
	Yes	No
	a.	When? (If more than once, please provide the additional information on the back of this page.)
	b.	Was it criminal? or civil?
	c.	Was it state? or federal?
	d.	If criminal, what kind of case was it?
	e.	Did you reach a verdict?  Yes No
	f.	Were you the jury foreperson?  Yes No
35.	Hav	e you served as a grand juror?
	Yes	No
	a.	Was it state? or federal?
	b.	Were you the grand jury foreperson?
		Yes No
36.		e you or an immediate family member ever worked for a lawyer or in a office?
	Yes	No
	If ye	es, who did, and what were your or their responsibilities?

				Juror No	
37.	Hav	Have you, an immediate family member, or a close friend ever been			
		•	Yes, I have	Yes, an immediate family member or a close friend has	No
	a.	charged with a crime?			
	b.	convicted of a crime?			
	c.	incarcerated?			
	d.	investigated by law enforcement?			
	e.	the victim of a crime?			
	f.	unfairly treated by law enforcement?			
	If y	ou answered yes to any of t	he above, p	lease explain.	
38.	part	ve you, an immediate family ticularly good or bad experi apply.)			all
		Law enforcement (policement) Prosecutor or prosecutor Criminal defense attorn Court or judge Any federal, state, or lo	r's office ey or defens		nt, etc.)
	•	es, please explain the circurether it was a good or bad ex			nd

		Juror No
39.	Do	you believe that
	a.	racial minorities are treated differently by police and law enforcement?
		Yes No If yes, please explain:
	b.	religious minorities are treated differently by police and law enforcement?
		Yes No If yes, please explain:
	c.	ethnic minorities are treated differently by police and law enforcement?
		Yes No If yes, please explain:
40.		you aware of anyone who you feel was unfairly investigated or secuted for a crime?
	Yes	No If yes, please explain:

	Juror No
41.	Are you, an immediate family member, or anyone close to you employed in, or do you have a background or training in, any of the following? (Please check <b>all</b> that apply.)
	Law enforcement (including police, sheriff, FBI, or other federal agency)  United States Attorney's office or other prosecutor's office  Lawyer's office  Local, state, or federal government  Court system  Corrections (or prison system)  Any intelligence agency (such as the CIA, the National Security Agency, or any intelligence service of the military)
	If you checked any, please explain who and what office or agency:
42.	Have you or any member of your immediate family ever had any legal dispute or claim with or against any department or agency of any local, state, or federal government?  YesNo
	If yes, state briefly the nature of the dispute or claim and the resolution, if any:
43.	Have you or anyone in your immediate family ever had assets seized or other collection measures (including garnished wages or a levy on bank accounts) initiated by any federal or state agency, including for child support payments?
	Yes No If yes, please explain:

	Juror No
44.	Have you ever been involved in a court proceeding in any other way?
	Yes No
	If yes, please check all that apply:
	A witness Giving a deposition Other: (please explain)
45.	Please list the newspapers, magazines, internet sites, and other news sources that you review on a regular basis:
46.	How often do you or your spouse read newspaper editorials or opinion
	pages (including blogs and internet news sites)?  Daily Weekly Monthly I don't follow the news
47.	What types of books do you enjoy reading?
48.	What programs and stations do you listen to on the radio?
49.	What television shows do you enjoy?

	Juror No
50.	Have you or your spouse ever written a letter to the editor of a newspaper, called a radio or television station, or posted a comment on-line about an issue?
	Yes No If yes, what was the issue?
51.	Do you or your spouse frequently watch truTV (formerly Court TV) or crime shows such as CSI, Law and Order, or Nancy Grace?
	Yes No If yes, which shows?
52.	Do you follow major criminal trials in the news?
	Yes No
	If yes, what trials have you followed or are you following?
53.	What are your favorite leisure-time interests, hobbies, or activities?
54.	Do you spend time solving crossword puzzles, jigsaw puzzles, or other types
	of puzzles?
	Yes No
	If yes, do you consider yourself to be accomplished at this hobby?

	Juror No
55.	Please list the last five movies you have seen in a theater or on tape, a DVD, or television:
56.	
	Yes No If yes, what does it (they) say?
57.	How often do you use the internet?
58.	For what purposes do you use the internet?
59.	Do you have your own social networking page (for example, a page on Facebook, MySpace, or Twitter)?
	Yes No
	If yes, what website hosts your page?

	e you talked or do you talk o	on-line?	
<i>l</i> es	No		
a.	If yes, how?		
	Chatrooms Instant Messaging Skype Other (please specify):		
b.	If yes, how often?		
	Daily Weekly Rarely		
c.	If you have children, do the	y communicate on	line?
The Ast	· Occult · Kabbala rology	Yes Yes	No No No
	ptian religions		No
	New World Order		No
The	Anti Christ	Yes	No
	ase explain any yes answer:		

	Juror No
63.	What is your religious affiliation, if any?
64.	Are you a member of a church, mosque, synagogue, temple, or other religious institution?
	Yes No
	If yes, please state any offices or leadership positions you hold or have held:
	If yes, how often do you attend?
	<ul><li>every week</li><li>occasionally</li><li>only on significant religious holidays or occasions</li></ul>
65.	Have you studied religion or comparative religion in school?
	Yes No
	If yes, please explain what you have studied:
66.	Do you consider yourself to be politically
	very liberal somewhat liberal moderate
	somewhat conservative
	very conservative
	none of the above

	Juror No
67.	Please list the names of all organizations to which you or your immediate family members belong, including clubs, unions, societies, fraternal organizations, and professional organizations, and state any offices you hold or have held in these organizations:
68.	The Judge and the parties estimate this case may last up to two weeks. Do you have any
	<ul> <li>physical problems (such as an inability to remain seated for 2-3 hours at a time)</li> <li>medical problems (such as with your sight or hearing)</li> <li>other conditions or issues that would make it difficult for you to serve as a juror in this case?</li> </ul>
	If so, please explain:

	Juror No
69.	Jury service is one of the highest duties—and privileges—of being a United States citizen; your participation is essential to the proper administration of justice. Mere inconvenience or the usual financial and personal hardships of jury service will not excuse you from serving on this case. You must show that service in this case would cause an unacceptable hardship before you will be excused from jury duty.
	Would you have a serious hardship if chosen for this case?
	Yes No
	If yes, please fully explain your hardship and the arrangements you could make to alleviate your hardship:
	JUROR'S OATH
	clare under penalty of perjury that the information that I have provided in this or Questionnaire is true and correct.
DA'	TE JUROR SIGNATURE
Prin	nted Name:
Juro	or Number:

## **Jury Questionnaire Part 2**

You are part of the panel of potential jurors for the case of *United States v. Ehsanul Islam Sadequee*. The United States is represented by Robert McBurney and Christopher Bly of the United States Attorney's Office for the Northern District

Juror 1	No.

of Georgia and Alexis Collins of the Counterterrorism Section of the United States Department of Justice. The Defendant is represented by Donald F. Samuel of Garland, Samuel & Loeb, P.C., and Khurrum Wahid of Wahid, Vizcaino & Maher, LLP.

Defendant Sadequee has been indicted by a federal grand jury and charged with conspiring to provide, attempting to provide, and providing material support and resources to terrorists and to a foreign terrorist organization.

An indictment is merely an accusation. It is not proof or evidence. You may draw no inference against the Defendant from the fact that he has been indicted. The Defendant has pleaded not guilty, and he is presumed innocent. The Defendant does not have to prove anything, and the Government bears the burden of proving the Defendant guilty beyond a reasonable doubt.

Please complete the remaining questions, which are specific to this case, just like you completed those in the first questionnaire. Thank you again for your time, honesty, and cooperation.

Do yo	Do you know or have you had any contact (personal, business, or social) with		
	_ Judge William S. Duffey, Jr., or any member of his staff		
	Any other judge in the Northern District of Georgia		
	_ David E. Nahmias, the United States Attorney for the Northern		
	District of Georgia		
	Robert McBurney, Alexis Collins, or Christopher Bly (the		
	prosecutors)		
	Anyone else who works in the United States Attorney's Office		
	Ehsanul Islam Sadequee (the defendant)		
	Anyone in Ehsanul Islam Sadequee's family		
	Donald F. Samuel or Khurrum Wahid (the defense attorneys)		
	_ Anyone who works in Donald Samuel's firm (Garland, Samuel &		
	Loeb) or anyone who works in Khurrum Wahid's firm (Wahid,		
	Vizcaino & Maher)		
	Any other person in the jury pool		

	Juror No
71.	Do you hold any belief, religious or otherwise, which discourages or prevents jury service?
72.	Do you have any knowledge about the facts in this case or about Defendant Sadequee other than what you have learned today?  Yes No Not Sure  If yes or not sure, what knowledge do you have?
73.	Do you know any other person who has been called to serve as a juror in this case?  Yes No  If so, how did you learn of their service?
74.	Have you read, seen, or heard about this case in any newspaper, TV, or radio program, internet site, or any other source?  Yes No Not Sure  If yes or not sure, what have you read, seen, or heard?
	What stands out most in your mind about what you have read, seen, or heard?

	Juror No
75.	Have you formed any opinion about the case or about Defendant Sadequee?  Yes No  If yes, what is your opinion?
76.	There was a trial earlier this summer involving an alleged co-conspirator of Defendant Sadequee's whose name is Syed Haris Ahmed. What, if anything do you know about that trial?
77.	(Answer required only if you answered that you know something about the trial mentioned in Question 76.) If you have knowledge of the earlier trial of Syed Haris Ahmed, would that make it difficult for you to listen to the evidence with an open mind and render a verdict based solely on the evidence presented during this trial and the law as instructed by the Judge?  Yes No Not Sure  If yes or not sure, please explain:
78.	Are you able to put aside any other pre-trial publicity or information that you have received regarding this case and focus only on the evidence that is presented in the trial and the legal instructions given to you by the Judge?  Yes No Not Sure  If no or not sure, please explain:

Juror No
Before trial and as the trial proceeds, this case may be the subject of stories in the media. The Judge will instruct you not to read, browse, or listen to any of this media coverage. Please explain any concerns you have about following this instruction.
The Judge will also instruct you not to use the internet or any other sources to research anything about this case. Please explain any concerns you have about following this instruction.
Do you know, or have you read, seen, or heard anything about, the following people? (Please check <b>all</b> that apply)
Matthew Acker Mariam Ahmed Syed Haris Ahmed Zubair Ahmed Hiam Akley Tim Alexandre James Allen Mirsad Bektasevic Aparna Bhattacharyya Veera Boonyasait Craig Bowling Anes Cengic Michael Culkin Richard Dearsley Dr. Fawaz Gerges Melissa Harper Omer Kamal Sheraz Khalid Aabid Hussein Khan Evan Kohlmann John Maguire

	Juror No
Lilima Nagpul	
William Puller	
Neil Rabinovitz	
Mark Richards	
Amimul Sadequee	
Sharmin Sadequee	
Sonali Sadequee	
Michael Scherck	
Khaled Sediqi	
Sardar Sharif	
Younis Tsouli	
T. Michael Williamson	
Kathy Wilz	
If so places explain:	
If so, please explain:	

82. Some people believe that persons of certain ethnic, racial, or religious groups are more (or less) likely to commit crimes. What is your feeling about this?

			Juror No
83.	is a different individual compared "South-Ass	ence betweens of the Mu to non-mir	nited States' criminal justice system, do you think there en the way minority-group defendants, such as aslim faith or of South-Asian heritage, are treated as nority defendants? (For this questionnaire, a person of e" means someone with family roots in India, Pakistan, anistan.)
	Yes	_ No	Not Sure
	If yes or n	ot sure, ple	ase explain:
	case with	an open mi	ke it difficult for you to consider the evidence in this nd and render a verdict based solely on the evidence
	and the leg	gal instruct	ions provided in Court?
	Yes	_ No	
84.	Have you	ever met so	omeone who is of the Muslim faith?
	Yes	_ No	Not Sure
85.	significant	t negative o	diate family member, or a close friend had any or positive experiences involving someone of the h-Asian heritage in a personal, social, business, or other
	Yes	_No	Not Sure
	If yes or n	ot sure, ple	ase explain:
	the eviden solely on t	ce in this c the evidence	ce or experiences make it difficult for you to listen to ase with an open mind and render a verdict based e and legal instructions presented in Court?
	1 es	_ No	

		Juror No
86.		ed of serious crimes are frequently treated thers say they are treated too harshly.
87.	in this case that would cause you a	of the charges in this case or the defendant problem in serving as a juror in this trial?
	Yes No Not Sure	<del>_</del>
	If yes or not sure, please explain:	
88.	believe to be discrimination because	mmediate family experienced what you e of your race, ethnicity, or religion?
	Yes No If yes, please	explain:
89.	Do you think that your experiences discrimination would affect your all	with discrimination or your views on bility to be fair and impartial in this case?
	Yes No Not Sure	
	If yes or not sure, please explain:	

	Juror No
90.	When you hear that someone is of the Muslim faith or South-Asian heritage, does that affect your perception of that person
	in a positive way, in a negative way, or not in any way?
	Please explain:
91.	Do you believe that the United States' military should be present in the Middle East, Iraq, or Afghanistan?
	Yes No Not Sure
	Please explain:

			Juror No	
92.		harged wi	involves a defendant of Muslim faith and South-Asian th terrorism-related crimes, do you have any feelings or	
	the	the United States' government, the United States' military, the United States Department of Justice, the Federal Bureau of Investigation (FBI), the Central Intelligence Agency (CIA), the National Security Agency (NSA), or any other governmental department or agency		
	mind and	render a v	lifficult for you to listen to the evidence with an open erdict based solely on the evidence presented during nstructed by the Judge?	
	Yes	_ No	_ Not Sure	
	If yes or i	not sure, pl	ease explain:	
93.	provides	justificatio	omeone who merely possesses written material that ns for the killing of non-Muslims should be prosecuted a such materials?	
	Yes	_ No	_ Not Sure	
	If yes or i	not sure, pl	ease explain:	

	Juror No
94.	Do you think it should be a crime for someone to express his or her support for a terrorist organization, such as Al Qaeda?
	Yes No Not Sure
	Please explain:
95.	Have you heard of the designated terrorist organizations Lashkar-e-Tayyiba (also known as "LET") or Jaish-e-Mohammed (also known as "JEM")?
	Yes No
	If yes, please explain what you know:
96.	What do you know, if anything, about the conflict in the Kashmir region on the border of India and Pakistan?
97.	Do you believe that you, an immediate family member, or a close friend has ever been affected in any way by a terrorist act or threat?  Yes No Not Sure
	If yes or not sure, who was affected, and how?

	Juror No
98 .	Since the September 11, 2001, terrorist attacks, do you believe the Government's policies and practices to prevent further terrorist attacks in the United States have been
	<pre>too aggressive or intrusive, not aggressive or intrusive enough, about right, or are you not sure?</pre>
	Please explain your response, including any concerns you have had about particular policies or practices that have or have not been used:
99.	What is your opinion about the war in Iraq?
100.	. What is your opinion about the war in Afghanistan?
101.	Do you have any immediate family or close friends who are serving or have served in the military in the war in Iraq, the war in Afghanistan, or are in any way involved with counter-terrorism?  Yes No
	If so, what is that person's relationship to you, and what is or was their role?

	Juror No
102.	Are any members of your extended family, including in-laws, or close friends of the Muslim faith?
	Yes No
	If yes, what is the relationship?
	Have you discussed their faith with them?
	Yes No
	If yes, please explain:
103.	Are any members of your extended family, including in-laws, or close friends of South-Asian heritage?
	Yes No
	If yes, what is the relationship?
104.	Do you have any knowledge about, or have you studied, the history and practices of Islam?
	Yes No
	If yes, how knowledgeable are you and what is the source of your knowledge?
105.	Do you believe that Islam generally endorses violence?
	Yes No Not Sure

	Juror No
106	. Law enforcement witnesses will testify in this case. Does the simple fact that a witness is a police officer or federal agent alone
	<ul> <li>(a) make it more likely that you will believe that witness over other witnesses?</li> <li>(b) make it less likely that you will believe that witness over other witnesses?</li> <li>(c) make no difference to you, and you will evaluate the testimony of that witness as you would any other witness?</li> </ul>
	If you checked (a) or (b), please explain:
107	. Do you think that a person who has been arrested by the police and charged with a crime is probably guilty?
	Yes No Not Sure
	If yes or not sure, please explain:
108	. How do you feel about government witnesses who have received immunity from prosecution or have received or may receive more lenient treatment after pleading guilty because they have agreed to cooperate?

					Juror No
109.	belie	eve, would you	ı be able to follow	the instruction on t	ered from what you the law even if it was the law should be?
	Yes	No	Not Sure	_	
	If no	o or not sure, p	lease explain:		
110.	sour	ces. If you can	not fairly and obj	in this case comes f ectively consider ev xplain why below.	
	a.	Electronic sur	veillance of priva	te communications	(wiretaps)?
	b.	Searches of p	rivate property (su	ach as someone's ho	ome)?
	c.	Physical survented places)?	eillance (e.g., ager	nts following a susp	ect in public
	d.	Interrogation	(questioning) of s	uspects?	

	Juror No
feel you could decide court and the Judge's	ions that you have read in this questionnaire, do you the case based solely on the evidence presented in instructions on the law, disregarding any other ideas, a may have about the law?
Yes No	Not Sure
If no or not sure, pleas	se explain:
	omments you have regarding serving on this jury, or do o believe you cannot be a fair and impartial juror if a this case?
	t covered by this questionnaire that you think the ght want to know about when considering whom to case?
114. Is there any matter yo the attorneys?	u would like to discuss privately with the Judge and

	Juror No
	JUROR'S OATH
I declare under penalty of Juror Questionnaire is to	of perjury that the information that I have provided in this rue and correct.
DATE	JUROR SIGNATURE
Printed Name:	
Juror Number:	