

**JURY QUESTIONNAIRE – UNITED STATES V. ERIC SHIBLEY**

This questionnaire has been prepared to assist the Court and the parties selecting the jury in this case. Please answer each question completely and accurately. Your complete written answers will save time for the judge, the lawyers, and for you. Your answers will have the effect of a statement given to the Court under oath.

Portions of this questionnaire inquire about knowledge you may have about the case or about certain government programs relevant to the case. Please do not do anything to learn, or learn more, about the case or the programs, including reading news reports or anything on the internet. It is important that you do not expose yourself to additional information that you impact your ability to be a fair and impartial juror.

For some of the questions, follow up questions by the Court or the attorneys may be necessary. If there is any question that you would rather not discuss publicly, or would only want to discuss further in private, please place a (\*) by that question and/or answer. If it is necessary to discuss that matter further with you, it will not be done in front of other jurors.

Please complete this questionnaire by yourself and do not consult with anyone else, or discuss the questions or your answers with anyone.

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Honorable John C. Coughenour  
United States District Court Judge

**Juror No:** \_\_\_\_\_

**PLEASE STATE:**

1. Your name: (Please print): \_\_\_\_\_

**BACKGROUND**

2. The case is titled *United States v. Eric Shibley*, and it involves allegations of false applications for PPP and EIDL loans. Have you heard anything about this case?

If yes, what have you heard?

3. Do you know the defendant, Eric Shibley?

4. Do you know the lawyers for the parties: Laura Connelly, Brian Werner, or Michael Nance?

5. Do you know anyone who works at the United States Attorney's Office or for the Department of Justice? Who?

6. Do you know anyone who is a defense attorney or works in criminal defense? If so, who?

7. Do you know the judge, the Honorable John C. Coughenour?

8. Do you know anyone that works for the United States District Court? Who?

9. Do you know any of the following potential witnesses?

Kandace A. Zelaya

Kathleen Littwin

Mitchell Mondala

Jeanne McDermott

Brittney Beard

Ramon Hernandez

Geoff Hiller

Cynde Cole

John Mosier

David Haagsma

Justin Masterman

Adam Seery

Phil Watkins

Lisa Velotta

Mario Davis

Michael Petron

David Madrid

Special Agent Kathleen Moran

James Burnell

10. Have you served on a criminal or civil jury?

a. If yes, were you able to reach a verdict?

b. Anything about that experience that would prevent you from serving fairly and impartially on this jury?

11. Have you ever received any training or work experience in the following areas?

\_\_\_\_\_ Accounting/Bookkeeping

\_\_\_\_\_ Law

\_\_\_\_\_ Criminal Justice

\_\_\_\_\_ Medicine

\_\_\_\_\_ Construction

\_\_\_\_\_ Taxation

If yes, please explain:

12. Have you, any member of your family, or a close personal friend ever been the victim of a crime?

a. If so, what type of crime?

13. Have you, or has any member of your family or a close friend, ever been employed by any law enforcement agency? Please describe.

14. Have you, any member of your family, or a close personal friend, ever been charged with a criminal offense, other than a minor traffic violation?

a. If so, please describe the circumstances.

b. Is there anything about this experience that would prevent you from being a fair and impartial juror in this case?

15. Have you, any member of your immediate family, or a close personal friend, ever had a bad or unpleasant experience with a law enforcement officer or agency?

a. If so, please describe that experience.

b. Is there anything about that experience that would prevent you from sitting as a fair and impartial juror in this case?

16. Do you have any feelings regarding the criminal justice system that might affect your ability to consider the evidence in this case fairly and impartially? Please describe.

**FURTHER QUESTIONS**

17. Have you, or a family member applied for a loan pursuant to the Paycheck Protection Program (PPP)?

18. Have you, or a family member applied for a loan pursuant with the Small Business Administration (SBA)? If yes, please describe.

19. Do you know anyone that has applied for a PPP loan or an SBA loan? If yes, please describe.

20. Have you, either through any experience you have had or anything you have seen or read, developed any bias, prejudice or other feelings for or against the SBA?

21. Have you, either through any experience you have had or anything you have seen or read, developed any bias, prejudice or other feelings for or against the FBI? Or any other law enforcement agency?

22. Have you or a family member ever worked for a bank, lender, loan processor, or other financial institution? If yes, please describe the relationship and the position.

23. Do you think you could be fair and impartial in weighing the evidence in a case in which a victim is a bank or other financial institution?

24. Have you, a family member, or a close friend ever worked for the SBA?

25. Have you or a family member ever worked for the government? If yes, please describe the agency or branch of the government.

26. Do you think you could be fair and impartial in weighing the evidence in a case in which the government is a victim?

27. In this case, the Defendant is accused of the crimes of wire fraud, bank fraud, and money laundering. Is there anything about the nature of the charges that causes you to believe that you cannot sit as a fair and impartial juror in this case?

28. Have you been a victim of or otherwise affected by what you believe to be fraud? If yes, please describe.

29. Will you follow the instructions of law that the Court will give you at the close of the case regardless of whether you agree with the instructions or not?

30. Would you disobey the judge's instructions on the law simply because they are different from your own understanding of what the law is or should be?

31. Do you have any philosophical or religious beliefs that would prevent you from judging the evidence and deciding a person's guilt or innocence? If yes, please describe.

**OTHER CONSIDERATIONS**

32. Do you have any concerns or issues with following the directions of the Court as it relates to masking, social distancing, and other COVID-19 protocols? Please describe.

33. Do you have concerns about safely serving on a jury over the course of multiple days?

a. If so, what are those concerns?

b. Would those concerns affect your ability to be a fair and impartial juror in this case?

34. Are there any deadlines, family issues, or personal health issues or concerns that would make it difficult for you to concentrate on the proceedings in court or otherwise difficult for you to sit as a juror? Please describe.

I have answered the above questions completely and truthfully.

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Signature of Juror

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Date