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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,)	No. CR 07-0732-SI
14 Plaintiff,)	UNITED STATES' SUBMISSION OF
15 v.)	JURY QUESTIONNAIRE
16 BARRY LAMAR BONDS,)	The Honorable Susan Illston
17 Defendant.)	

18
19 The United States herein submits the Jury Questionnaire (Attachment A) agreed upon by
20 the parties and compliant with this Court's order of March 15, 2011 (Document 288).

21 DATED: March 16, 2011

Respectfully submitted,

22 MELINDA HAAG
United States Attorney

23 /s/
24 _____
MATTHEW A. PARRELLA
JEFFREY D. NEDROW
25 Assistant United States Attorneys

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U.S.' SUBMISSION OF
JURY QUESTIONNAIRE
[CR 07-0732-SI]

Attachment A

Juror Name: _____

Juror Signature: _____

Juror Number: _____

Juror No. _____

United States v. Barry Lamar Bonds
Juror Questionnaire

The indictment charges defendant Barry Bonds with four counts of giving a false declaration in violation of 18 U.S.C. § 1623(a), and one count of obstruction of justice, in violation of 18 U.S.C. § 1503. The indictment is not evidence. The indictment is simply the document used to advise a defendant of the accusations against him. The defendant has pleaded not guilty to all the charges.

Instructions

Please complete the following questionnaire to assist the Court and counsel in selecting a jury to serve in the case of United States v. Barry Lamar Bonds. The purpose of these questions is not to ask unnecessarily about personal matters. It is simply to determine whether a prospective juror can decide the case fairly and impartially.

Please do not discuss the questionnaire or your answers with anyone. It is very important that the answers be yours and yours alone. Remember that there are no "right" or "wrong" answers; only truthful answers. Because this questionnaire is part of the jury selection process, it is to be answered under oath. You are sworn to give true and complete answers to all questions.

Please print your answers and use ink to ensure legibility. Please write your assigned juror number on the first page. Do not write on the back of any page. If you require additional space for any of your answers or wish to make further comments, please use the explanation sheets attached to the end of this questionnaire.

Thank you for your cooperation.

Juror Number: _____

City or Community: _____ Age: _____ Gender: _____

Do you rent or own your residence? () Own () Rent () Neither (live with family)

How long have you been at this residence? _____

PLACE OF BIRTH: _____

1. What is your marital status?

- () Single and never married () Married for _____ years () Separated
- () Divorced, not remarried () Divorced, now remarried
- () Widowed, not remarried () Widowed, now remarried
- () Single but living with non-marital partner for _____ years

2. What is the highest level of education you have completed?

- () Grammar school () Junior high () Some high school () High school diploma
- () Trade or technical school Subject studied: _____

() Some college Major/Degree: _____ School attended: _____

() College degree Major: _____ School attended: _____

() Graduate school Major/Degree: _____

School attended: _____

If you plan to attend or are currently attending school, please describe:

If you have taken any courses or had any training in law or a related subject, please describe:

3. Is English your first or native language? () Yes () No

If no, what language is your first or native language? _____

How well do you understand written English? () Very well () Well () Not very well () Poorly

How well do you understand spoken English? () Very well () Well () Not very well () Poorly

4. What is your current job status?

- Working full-time Working part-time Retired Disabled
 Unemployed Homemaker Student

How long has this been your job status? _____

5. What is your current or most recent job? (Please state if you are retired, a homemaker, unemployed, disabled, or a student. If so, describe your previous occupation or your most recent job):

Employer: _____

Job title: _____

6. What are your specific duties and responsibilities on the job:

7. Does your job involve supervising other people? Yes No

If yes, approximately how many? _____

What other full-time employment have you had over your working life?

8. If married, or sharing a household with another adult, please describe that person's job. (Please state if they are retired, a homemaker who does not work outside the home, unemployed, disabled, or a student. If so, describe their previous occupation or most recent job):

Employer: _____

Job title: _____

Please describe their job duties: _____

How long have they had (or did they have) this job? _____ years

9. Do you have any children? Yes No

IF YES, please indicate age, education and occupation of your children.

AGE EDUCATION OCCUPATION

10. Please list any organizations, civic clubs, societies, professional associations, recreational groups, or clubs that you have belonged to within the last 5 years.

11. Do you hold a leadership position in any of the groups or organizations you belong to?

Yes No IF YES, what?_____

12. Have you ever previously served on a jury? Yes No

If yes, how many were criminal trials?_____

How many were civil trials? _____

IF YES, did you serve as a foreperson? Yes No

Without indicating what the verdict was, did the jury reach a verdict in all the cases?

Yes No

Please explain how you felt about your prior jury experience.:

13. If you have been to court for any reason other than divorce, please explain:

14. If you have relatives or close personal friends who are judges or attorneys or court personnel, what are their name and relationship to you?

15. Please describe any problem (vision, hearing or other medical problems) that may affect your jury service:

16. Have you ever served in the military?

Yes, currently Yes, but not currently No

17. Have you, a family member or close friend ever considered working in law enforcement?

Yes No IF YES, who? _____

IF YES, please explain: _____

18. Have you, or any family member or close friend, ever been employed by any of the following?

(a) Federal, State or County Prosecutors' Offices Yes No

(b) Federal or State Correctional agencies such as a prison, jail or probation or parole office? Yes No

(c) Any Federal law enforcement or investigative agency (examples of which are FBI, DEA, BATF, CIA, Customs, Immigration, Secret Service, etc.) Yes No

(d) Any state law enforcement agency (examples of which are local police departments; sheriffs, highway patrol, etc.) Yes No

(e) Public Defender or AID organization Yes No

(f) Law office or law firm? Yes No

19. If you answer to any of the above is yes, please explain which agency/office, the dates and describe the employment:

20. Have you ever had to appear in court or in any court proceeding in a case as a plaintiff, defendant, victim, or witness for any reason other than that stated above?

Plaintiff Defendant Victim Witness No

IF YES, please state when and explain why you appeared in court:

21. Have you, an immediate family member or close personal friend ever suffered from a substance abuse problem?

Yes No

If yes, would that experience make it difficult for you to serve as an impartial juror in this case?

22. Have you ever been a party to a lawsuit, whether civil or criminal? Yes No

IF YES, what was the nature of the case? _____

23. Have you ever had your deposition taken? Yes No

IF YES, what was the nature of the case? _____

24. Have you or has anyone close to you, ever been asked to testify in court as an expert witness, or as a witness with special knowledge or training? Yes No

IF YES, please describe: _____

25. Have you, or has someone close to you, ever been the victim of a crime? Yes No

IF YES, please describe the crime(s): _____

Was anyone arrested? Yes No

IF YES, there was an arrest, what was the outcome? _____

IF there was a trial, did you testify? Yes No

Were you satisfied with the way law enforcement handled the matter? Yes No

Why or why not? _____

26. Have you, or has anyone close to you, been strongly affected by a crime, either growing up or as an adult? Yes No

IF YES, please describe the circumstances: _____

27. Have you, a family member or close friend ever been accused of or convicted of a crime?

Yes No

IF YES, please describe: _____

Were you satisfied with the way law enforcement handled the matter?

Yes No

Why or why not? _____

Do you feel you were treated well by your own attorney(s)? Yes No

Please describe: _____

28. How often do you get your news from:

Newspapers Never Monthly Weekly Daily

Magazines Never Monthly Weekly Daily

Radio Never Monthly Weekly Daily

Television Never Monthly Weekly Daily

Internet Never Monthly Weekly Daily

Other _____ Never Monthly Weekly Daily

29. Please list newspapers and/or magazines that you read regularly:

30. How often do you read either in print or on-line any of these publications, if at all?

- | | | | | | |
|-------------------------|--------------------------------|-----------------------------------|------------------------------------|--------------------------------|------------------------------------|
| San Francisco Chronicle | <input type="checkbox"/> Never | <input type="checkbox"/> A little | <input type="checkbox"/> Sometimes | <input type="checkbox"/> A lot | <input type="checkbox"/> Every day |
| SF Gate | <input type="checkbox"/> Never | <input type="checkbox"/> A little | <input type="checkbox"/> Sometimes | <input type="checkbox"/> A lot | <input type="checkbox"/> Every day |
| San Francisco Examiner | <input type="checkbox"/> Never | <input type="checkbox"/> A little | <input type="checkbox"/> Sometimes | <input type="checkbox"/> A lot | <input type="checkbox"/> Every day |
| Sports Illustrated | <input type="checkbox"/> Never | <input type="checkbox"/> A little | <input type="checkbox"/> Sometimes | <input type="checkbox"/> A lot | <input type="checkbox"/> Every day |
| ESPN Magazine | <input type="checkbox"/> Never | <input type="checkbox"/> A little | <input type="checkbox"/> Sometimes | <input type="checkbox"/> A lot | <input type="checkbox"/> Every day |
| Sporting News | <input type="checkbox"/> Never | <input type="checkbox"/> A little | <input type="checkbox"/> Sometimes | <input type="checkbox"/> A lot | <input type="checkbox"/> Every day |
| Yahoo! Sports | <input type="checkbox"/> Never | <input type="checkbox"/> A little | <input type="checkbox"/> Sometimes | <input type="checkbox"/> A lot | <input type="checkbox"/> Every day |

31. How often do you use the Internet?

- Never A little Sometimes A lot Every day

What sort of things do you use the Internet for? _____

What sort of information do you obtain from the Internet? _____

Which web sites do you visit regularly? _____

32. Do you like to "blog" or read blogs on the Internet? Yes No

IF YES, which blogs do you visit? _____

33. Do write your own blog or post comments on other blogs? Yes No

IF YES, what is the name of your blog or what blogs do you post comments to?

34. Have you ever followed any trials closely on TV, the radio, or in the news?

Yes No

IF YES, which trials: _____

35. Have you or an immediate family member ever participated in organized sports?

Yes No

IF YES, please explain, including level (i.e. high school, college, Division I, II or III, professional)

36. Have you or an immediate family member ever coached an organized sport?

Yes No

IF YES, please explain, including level (i.e. high school, college, Division I, II or III, professional)

37. Generally, how closely do you follow sports news? **(Check only one)**

Never A little Sometimes A lot Every day

38. What is your main source of sports news? **(Check only one)**

Television Radio
 Newspaper Friends/Family/Coworkers
 Magazine Internet

39. Are you a fan of professional baseball? Yes No

40. Have you attended a professional baseball game in the past five years? Yes No

IF YES, how many games have you attended in the past five years? _____

41. Have you attended a San Francisco Giants' game in the past five years? Yes No

If yes, how many games have you attended in the past five years? _____

42. Have you heard, read or seen anything about other cases concerning accusations of steroid use by athletes?

Yes No

IF YES, please explain: _____

43. Are you familiar with recent investigation and charges concerning the Bay Area Laboratory Co-Operative's (BALCO) involvement with steroids or performance enhancing drugs?

Yes No

IF YES, please describe what have you seen, read or heard: _____

44. Have you heard, read or seen anything about the Mitchell Report?

Yes No

IF YES, please describe what have you seen, read or heard: _____

45. Have you heard, read or seen anything about the Congressional hearings regarding steroid use in Major League Baseball (MLB)?

Yes No

IF YES, please describe what have you seen, read or heard: _____

IF YES, what was your opinion of these hearings?

Positive Neutral Negative

PLEASE EXPLAIN your answer: _____

How strongly do you agree with the following statements:

46. Governmental agencies should be involved with professional sports and their governing of steroid use.

Disagree strongly Disagree Neither Agree Agree strongly

47. Reports about this case have appeared in the news. Have you seen, heard or read anything about this case? (This includes not only anything you may have seen or read in the media, but also anything you might have heard from relatives, friends or coworkers.)

Yes No

IF YES, please indicate where you heard or read about this case by checking **all that apply**:

TV News Radio News Newspaper Magazines Books, including "Game of Shadows" Internet On-Line Conversations Overheard others discussing the case

48. How would you describe the amount of news coverage you have seen about this case:

None A little Some A lot

49. Describe what you recall hearing about this case:

50. Do you have a favorable or unfavorable opinion of Barry Bonds?

Favorable Unfavorable No Opinion

51. Have you formed any opinions about this case? If so, please describe.

52. Is there anything that you have heard about this case that you feel would make it hard for you to be a juror in this case? Yes No

IF YES, please explain: _____

53. In general, would you view the evidence presented by the defense differently than you would the evidence presented by the prosecution? Yes No

IF YES how?

54. Do you have any ethical, religious, or political views or beliefs that may affect your service as a juror in this case? Yes No

If so, please describe _____

55. Under the law, the facts at issue in the trial are for the jury to determine. The law applicable to the charges in the case is something on which the court will instruct you. You are required to accept the law as the judge explains it to you regardless of any opinions you might have as to what the law is or should be. Would you have any difficulty following that instruction?

Yes No

IF YES, explain why: _____

56. Some witnesses in this case may be law enforcement officers and government officials. The credibility of these witnesses is to be judged by the same standards as any other witness. Their testimony is not entitled to any greater or lesser weight simply because they are involved in law enforcement. Would you have any difficulty following this rule?

Yes No

IF YES, explain why: _____

57. Under the law, a defendant need not testify or produce any evidence. The burden of proof is always on the government. If a defendant does not testify, the jury may not consider that fact in any way in reaching a decision. Would you have any difficulty following this rule?

Yes No

IF YES, explain why: _____

58. Every defendant is presumed innocent and cannot be convicted unless the jury, unanimously and based solely on the evidence in the case decides that his guilt has been proved beyond a reasonable doubt. Would you have any difficulty following this rule?

Yes No

IF YES, explain why: _____

59. The jurors in this case will be required to take an oath that they will decide the facts in this case according to the evidence and the law as the judge gives it to you, and that they will do so without fear or favor to any person. Is there anything about this case that may prevent you from following that oath?

Yes No

60. If you are selected as a juror and hear this case, you will be required to deliberate with other jurors. This will required you to discuss the evidence and the law in this case with the other jurors. Do you anticipate that you will have difficulties engaging in such group discussions?

Yes No

IF YES, explain why: _____

61. Is there any matter that you should call to the court's attention that may have any bearing on your qualifications to serve as a juror, or that may affect your ability to render an impartial verdict based solely on the evidence and the court's instructions on the law?

Yes No

IF YES, explain why: _____

62. Can you think of any reason that would prevent you from being a fair and impartial juror in this case? _____

63. Attached is a list of law firms representing the parties in this case, organizations involved in this case, attorneys in this case, and persons who are potential witnesses in this case. If you know, or think you know, any of the persons or persons in the organizations listed, please circle any name that is familiar to you.

United States Attorney's Office

Federal Bureau of Investigation

Riordan & Horgan

Rains, Lucia & Wilkinson LLP

Internal Revenue Service

Arguedas, Cassman & Headley LLP

Law Offices of Allen Ruby

J. Douglas Wilson	Jeff Novitzky	Jeffrey Nedrow
Matthew Parrella	Jeffrey Finigan	Ross Nadel
Barry Bonds	Cris Arguedas	Allen Ruby
Ted Cassman	Michael Anderson	Dennis Riordan
Donald Horgan	Michael Rains	Kimberly Bell
Marvin Benard	Wendy Bergland	Dr. Don Catlin
Stan Conte	Bobby Estalella	Ana Geter
Jason Giambi	Jeremy Giambi	Kathy Hoskins
Steve Hoskins	Larry Izzo	Dr. Jean Joseph
Dale Kennedy	Amjad Qaqish	Armando Rios
Dr. Barry Sample	Benito Santiago	Dr. Arthur Ting
Jim Valente	Randy Velarde	Mike Wilson
Greg Anderson	Melissa Duncan	Brian Bishop
Borislav Starcevic	Yvonne Chambers	Todd McGauley
Stephen Kauffman	Brian Aherns	Dr. Brian Goldman
Harvey Shields	Mark Letendre	Dr. David Black
Dr. Ronald Swerdloff	Ken Bonano	Erwin Rogers
Jon Colombet	Ed Barberini	Christopher Fuelling
Brian Cook	Heather Young	Anthony Montero
Douglass Doss	John Posusney	Steve Coffin
Vincent Browning	Gregory Jenkins	

If you circled any of these names or organizations, please explain how that person is familiar to you:

I, (insert name) _____, understand that I have been ordered by the Court to refrain as of now from disseminating or obtaining information about Barry Bonds, the Bonds trial, the court, any of the parties, attorneys, or witnesses, to or from any source outside the courtroom from this day until the end of the trial. This order prohibits me from disseminating or obtaining information about Barry Bonds, the Bonds trial, the court, any of the parties, attorneys, or witnesses by way of the internet, newspaper, television, personal conversation, social networking sites, or supplying or gaining information to or from any source outside of the courtroom. This order is necessary in order to protect the right of both sides to have a fair trial based on evidence introduced in a court of law.

This means that I promise not to converse face to face with anyone about the case and not to communicate with anyone about the case by any other means, direct or indirect, such as: a writing, the telephone, e-mail, Facebook, MySpace, Twitter, instant messaging, Blackberry messaging, I-Phones, I-Touches, Google, Yahoo, any internet search engine or any other form of electronic communication for any purpose whatsoever.

I further understand that if I were to violate this order I could be held in contempt of court which is punishable by jail and/or monetary fine.

I, (insert name) _____, declare under penalty of perjury that the answers set forth in the above 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.

Dated: _____

Signature _____

