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CLERK SUPERIOR COURT
BY: dh DEPUTY

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
8 **IN AND FOR THE COUNTY OF MOHAVE**

9 **STATE OF ARIZONA,**)
10 Plaintiff,) NO: CR 2014 - 01193
11 vs.) **DEFENDANT'S PROPOSED JURY**
12) **QUESTIONNAIRE TO ASSIST ALL**
13 **JUSTIN JAMES RECTOR**) **PARTIES WITH JURY SELECTION**
14 Defendant.) (ASSIGNED TO THE HON. LEE JANTZEN)
15

16 Defendant Justin James Rector, by and through undersigned counsel, provides a
17 proposed jury questionnaire to assist all parties in gathering critical information to seat a
18 fair, impartial jury in this life and death matter. Reasons why such a questionnaire is
19 appropriate have been provided to all parties via separate defense motion filed
20 September 16th, 2015. The proposed questionnaire is provided in Exhibit "A" attached
21 hereto and incorporated herein. Counsel respectfully requests the questionnaire be
22 provided all jury veniremen call for potential jury service in this case, and completed as
23 detailed in the above referenced motion of September 16th, 2015.
24

25 Such a jury questionnaire is the current standard of practice nationwide to allow
26 the parties and court to gather the maximum relevant potential juror information, in the
27



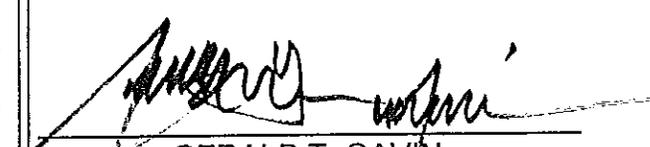
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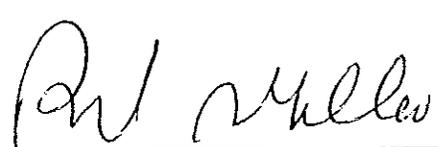
1 least intrusive means possible, with the ultimate goal of seating a fair, impartial jury to
2 all sides in the most expedient way possible.

3
4 RESPECTFULLY SUBMITTED This 30th day of September, 2015.

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GERALD T. GAVIN
Co-Counsel for Mr. Rector



RON GILLO
Co-Counsel for Mr. Rector

1 ORIGINAL of the foregoing filed
2 this 30th day of September, 2015 with:

3 Clerk of Court
4 401 E Spring Street
5 Kingman Arizona 86401

6
7 COPY of the forgoing
8 Delivered this 30th day
9 Of September , 2015, to:

10 Honorable Lee Jantzen
11 Judge of the Superior Court
12 Mohave County Courthouse
13 2nd floor
14 Kingman Arizona 86401

15 Greg McPhillips
16 Assigned Deputy County Attorney
17 PO Box 7000
18 Kingman Arizona 86401

19 Ron Gilleo
20 Mohave County Legal Defender
21 Co-Counsel for Justin James Rector
22 313 Pine Street
23 PO Box 7000
24 Kingman Arizona 86401

25 Client Justin James Rector
26 Mohave County Jail

27 File

28 BY: 

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EXHIBIT "A"

THE HONORABLE LEE JANTZEN
SUPERIOR COURT DIVISION IV
MOHAVE COUNTY

STATE OF ARIZONA vs. JUSTIN JAMES RECTOR

JURY QUESTIONNAIRE

This questionnaire has been approved by the Court and is to be filled out by each prospective juror in this case. The questionnaire is designed to obtain information regarding your qualifications to sit as a juror in a pending criminal case.

This information is designed solely to save time and assist the Court and the parties in selecting jurors for the trial. Using this questionnaire will substantially shorten the time needed to pick a jury. It is not our intention to embarrass anyone. Your responses to these written questions will eliminate the need to ask these questions in open court. You are given more privacy by answering them in this questionnaire.

YOU ARE UNDER OATH AND ARE REQUIRED TO ANSWER THE QUESTIONS TRUTHFULLY. YOU ARE EXPECTED TO SIGN THE QUESTIONNAIRE AND YOUR ANSWERS WILL HAVE THE EFFECT OF A STATEMENT GIVEN UNDER OATH TO THE COURT.

In order to ensure that your answers are not influenced by the opinions of others, you should fill out the questionnaire by yourself without consulting or talking to any other person about it.

You must print or handwrite your answers in *blue or black pen*. Please print or write legibly. If your answers are illegible, you may be requested to re-copy your answers.

Please read each question carefully and answer each question as completely and accurately as possible. Your complete answers will save a great deal of time for

the Court, the parties and you. There are no right or wrong answers. Please just answer honestly to the best of your ability.

If you cannot answer a question because you do not understand it, write "DO NOT UNDERSTAND" in the space after the question. If you cannot answer the question because you do not know the answer, write "DO NOT KNOW" in the space after the question. If you need extra space to answer any question, please use the extra blank sheet of paper at the end of the questionnaire. Add additional blank sheets if needed. Always be sure to indicate on the blank page the number of the question you are answering. ***If any question calls for a response that is so personal and private that you want to discuss it with the judge and attorneys in the judge's chambers, please write "I NEED TO SPEAK IN PRIVATE" and give a brief description of the information. If any follow-up is required, a private hearing with the judge and attorneys, without the presence of other jury pool members, can be conducted to discuss the response.***

As mentioned, it is not anyone's intent to embarrass potential jurors. It is essential that all concerns and information be dealt with at this stage. A potential juror withholding information now...could result in the trial being halted, and cause numerous problems. All information will be treated as discreetly as possible by the parties.

Until you are excused as a potential juror, ***you are ORDERED*** not to discuss anything connected with this case, including the questions asked in this questionnaire, your answers or any other aspect of this case with anyone, including your family and friends. ***You are also ORDERED to avoid reading or listening to any news coverage of this matter or to discuss this matter with any other person.*** Do not allow anyone to discuss these subjects with you. The parties are not permitted to discuss this with potential jurors unless the Judge is present. *Please do not attempt to communicate with any party regarding this questionnaire; if a problem arises, please notify the judge's staff immediately.*

The parties are entitled to learn relevant information about potential jurors. This questionnaire is designed to gather that essential information. Using this format should greatly speed the process and, hopefully, avoid any embarrassment that discussing these matters in open court might bring to a potential juror. The goal for everyone is seating a jury fair and impartial to all sides.

The Court will provide additional information as needed.

THANK YOU FOR YOUR ANTICIPATED PATIENCE AND COOPERATION

DATE

THE HONORABLE LEE JANTZEN

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JUROR QUESTIONNAIRE

The information on this questionnaire is for the judge and attorneys in this case. Please answer all of the questions as completely and honestly as possible. Remember each of you are **under oath**. Please keep in mind there are no "right" or "wrong" answers. Just read each question carefully and give an honest answer. You *must not discuss* your answers with any other juror. If you need help, ask one of the Court clerks for assistance, not the parties. Thank you for your cooperation.

1. Name: _____ Date of Birth: _____

2. Sex: M ___ F ___

3. Do you speak English: Yes ___ No ___

4. Do you read English: Yes ___ No ___

5. Do you write English: Yes ___ No ___

6. Is English your primary language? Yes ___ No ___ What language is? _____

7. Do you require an interpreter for that language? Yes ___ No ___

8. Do you have a hearing impairment of any kind? Yes ___ No ___

Do you require a sign language interpreter? Yes ___ No ___

9. Do you have any trouble seeing? No ___ Yes ___

Wear glasses or contacts? No ___ Yes ___

Legally Blind? No ___ Yes ___

10. Do you have any physical or medical problems that might impact your jury service?

No ___ Yes ___ What problem? _____

Do you take any medication? No ___ Yes ___ What medication? _____

11. Do you have any medical problems/medications that effect your memory or concentration? No ___ Yes ___

12. Can you sit through a long trial? Yes ___ No ___ Why? _____

13. Have you, your spouse or significant other had a drug and/or alcohol problem?

No ___ Yes ___ Who/ What? _____

14. Do you think people with drug/ alcohol problems are:

> Weak? No___ Yes. (if yes please explain)_____

> Sick, or Addicted? No___ Yes_____

> Immoral? No___ Yes_____

15. Have you, family or close friends ever undergone counseling, treatment or hospitalization for psychiatric, emotional, family, behavioral or substance abuse problems? No___ Yes___ If yes, please give details:_____

16. Have you, your spouse or significant other served in the military?

You: No___ Yes___ Branch/Dates of Service_____

Spouse: No___ Yes___ Branch/Dates of Service_____

17. What town do you live in, or closest to? _____

18. Where did you grow up? _____

19. How long have you lived at your present address: _____

20. Have you lived outside Arizona? No___ Yes___ / Where: _____

21. Have you lived outside the United States? No___ Yes___
Where/Dates _____

22. How long have you lived in Mohave County? _____

23. Regarding Housing, do you: Own___ Rent___ Live with Homeowner(s)_____

List the first names of members of your household and their relationship to you:

24. How much education do you have?

Grade school or less _____

Some High School: _____ Graduated High School: _____ G.E.D. _____

Technical or Business School: _____

Some college: _____ Graduated College: _____ Degree in: _____

Major area of study in College: _____

Post Graduate degree _____ Degree _____

Field of study: _____

25. Are you presently a student? No ___ Yes ___ Where: _____

Anticipated completion date _____

26. Do you have specialized training in medicine or science courses or study? No ___
Yes ___ What? _____

27. Do you watch any of the "C.S.I." shows on television? No ___ Yes ___ Which? _____

28. Are you currently:

Employed Full Time _____

Employed Part Time _____

Unemployed _____

Retired _____

Employed at more than one job _____ Self employed _____

Full time homemaker _____

29. If employed, list your current occupation and employer: _____

Briefly describe your occupational duties: _____

30. What jobs have you held in the past: _____

31. Ever been responsible for supervising, hiring or firing employees? Yes___ No___

32. Martial Status: Single___ Married___ Widowed___ Divorced___ Separated___
Never married___ Living with someone___

33. How many times have you been married?_____

34. Please tell us the sex, age and occupation of your children and/or step children:

35. Have you, family, or friends ever worked for a law enforcement agency [this includes Police, D.E.A., F.B.I., A.T.F., Homeland Security, Border Patrol, Secret Service, Corrections, Juvenile Corrections, Military Police, Highway Patrol, Sheriffs, Probation, Immigration and Customs, or private security company? No___ Yes___

If yes, who and what agency?_____

36. Have you, a family member, or close friend ever sought employment by or seriously considered training with any law enforcement agency or related agency, such as police, sheriff, correctional officers, FBI, district attorney's, etc? No___ Yes___ (If yes please explain)_____

37. Have you, family or friends ever worked for a Local, State or Federal Government Office? No___ Yes___ If yes, who and what agency(s)?_____

38. Have you, family, or friends been a lawyer, paralegal, law professor, or worked in the legal field? No___ Yes___ Who, and what position(s)_____

39. Have you ever taken a course in Constitutional Law? No___ Yes___

40. Have you, your spouse or significant other ever been arrested? No___ Yes___

If yes, please detail:_____

51. Do you yourself know any Judges, Attorneys, Paralegals, Investigators, or people involved in the legal system, on a personal or professional basis? No___ Yes___ If yes, please explain_____

52. Have you, your spouse, or significant other been a victim of a crime? No___ Yes___ Please give details:_____

53. Have you, your spouse, or significant other been a witness to a crime? No___ Yes___ Please give details_____

54. Have you ever served on a jury? No___ Yes___

As a jury foreman? Yes___ No___

Type/ how many times : Criminal___ Civil___ Both___ Grand Jury___

Verdicts: Guilty___ Not Guilty___ Hung___ Punishment?_____

Anything about prior jury service that might effect your ability to be fair and impartial to either the State or Defense? No___ Yes___ Please explain_____

55. Has your spouse or significant other served on a jury? No___ Yes___

Any details?_____

56. At the beginning of the trial, every defendant is:

Innocent___ Guilty___ Both Sides Equal/ "Scales of Justice" Balanced___

What system of justice do you think is fair?

A. Guilty until proven innocent?___

B. Innocent until proven guilty?___

What system do we have in the United States? A. ___ B. ___

Do you believe the system is too easy___, or too harsh___, on criminals?

57. "A defendant is innocent until proven guilty beyond a reasonable doubt."
Strongly agree___ Agree___ Strongly Disagree___ Disagree___ No opinion___

58. "In a trial, I would need to hear from the person accused or otherwise he is likely guilty"
Strongly agree___ Agree___ Strongly Disagree___ Disagree___ No opinion___

59. "The criminal justice system makes it too hard for the police and prosecutors to convict people accused of crimes"
Strongly agree___ Agree___ Strongly Disagree___ Disagree___ No opinion___

60. "In general, people convicted of serious crimes receive lenient sentences from the courts."
Strongly Agree___ Agree___ Strongly Disagree___ Disagree___
No Opinon___

61. "It is better for society to let some guilty people go free than to risk convicting an innocent person"
Strongly Agree___ Agree___ Strongly Disagree___
Disagree___ No Opinion___

62. "If the police think he did it, and the Prosecution goes to the trouble of bringing someone to trial, the person is probably guilty"
Strongly agree___ Agree___ Strongly Disagree___ Disagree___ No opinion___

63. "The testimony of law enforcement officers or agents is not entitled to any greater or lesser weight merely because they are law enforcement officers or agents"
Strongly agree___ Agree___ Strongly Disagree___ Disagree___ No opinion___

64. "Regardless of what the Judge or Lawyers say, a defendant in a criminal case should be required to prove his guilt or innocence"
Strongly agree___ Agree___ Strongly Disagree___ Disagree___ No opinion___

65. Do you watch television? No. ___ Yes ___

Favorite Shows: _____

66. Favorite authors/ Books: _____

67. Favorite Magazines : _____

68. Favorite Hobbies if any: _____

69. Do you travel: Out of State__ Out of Country__ Where? _____

70. Do you use the internet? No__ Yes__

Hours a day__ Minutes a day__ Once a day__ Once a week__ Less__ None__

71. Do you engage in social media, via smartphone/ tablet or computer? No__ Yes__

Facebook. No__ Yes__ How often do you go on it? _____

Snapchat No__ Yes__ How often do you go on it? _____

Instagram No__ Yes__ How often do you go in it? _____

Other sites? _____

72. Do you have a favorite news site online? _____

Do you listen to the radio? No__ Yes__ Favorite Station(s) _____

Do you read the newspaper? No__ Yes__ Name of Paper(s) _____

Do you watch: Fox News? No__ Yes__ MSNBC No__ Yes__

Any other National/Local News Source(s) _____

73. Are you religious? No__ Yes__ What? _____

74. How often do you attend religious services?

Daily__ Once a week__ Occasionally__ Rarely__ Never__

75. Are you involved in any social activities with your congregation?

76. Do you belong to any fraternal organizations? (example: Elks, Lions, VOFW, Knights of Columbus, etc..... No___ Yes___ (if yes please list)_____

77. This case involves the death of a young girl in Bullhead City. Have you heard about this case before today? No___ Yes___ How (friend discussed/ newspaper/ etc..) _____

In general, what have you heard, if anything?_____

78. Understanding the Judge will read to you a list of names of witnesses / possible witnesses in this case, do you already know any of people involved in this case?

No___ Yes___ Who/ How?_____

79. Do you have an personal knowledge about the alleged crime, the people involved, the locations, or any involvement in this case as a witness, or any capacity?

No___ Yes___

What_____

80. Experts may be called by one, or both, sides in this case. Do you feel differently about experts called by one side versus the other? No___ Yes___ If yes, please explain _____

81. Portions of this trial may be covered by local, regional or statewide media, either in print, online, t.v. or radio. The Judge will instruct you not to read, watch, or listen to any media discussion or coverage of this case while the trial is pending. Will you have difficulty following these instructions? No___ Yes___

88. Do you believe your service on this case would cause an unreasonable and unwarranted burden on your time? No____ Yes____ Please explain:_____

89. If you are elected to serve on this jury, will concerns over your own life/schedule cause you to consider voting "guilty" or "not guilty" with the majority simply to get this trial over with? No____ Yes____ Please explain_____

90. Have you seen the classic movie "12 Angry Men", about jury service on a murder trial? No____ Yes____ Thoughts about the movie?_____

91. Do you like to get along with people, and "go along" with the crowd simply to avoid arguments or unpleasantness? No____ Yes____

92. Do you have a fear of public speaking, or more precisely feel apprehension expressing your thoughts and idea's in front of a group of approximately 15 people? No____ Yes____ Please elaborate:_____

93. There may be evidence or testimony regarding drug use, on involvement in this case. Do you have strong feelings regarding drug use or the people using those drugs in general? No____ Yes____ if yes, please explain_____

94. Does the fact that a child is the victim in this case make you as a juror want to treat this case differently than if the victim were an adult? No___ Yes___ Please elaborate: _____

95. As a juror, when the victim is a child, do you feel a special duty to make sure the child's parents are not caused further grief and hope a guilty verdict is returned in this case? No___ Yes___ If yes, please explain _____

96. Political affiliation? Republican___ Democrat___ Independent___ Don't care___

97. If selected as a juror, do you have any special needs the court staff may assist you with, or schedule concerns for health reasons (i.e. insulin shots, medication dosing, need to walk or raise legs for blood circulation, food intake for hypoglycemia, etc...)

No___ Yes___ _____

98. If you are selected as a juror, would you be concerned or embarrassed about reactions to the verdict, from family, friends, neighbors, or others, regarding the verdict if you were to vote:

Guilty: No:___ Yes:___ explain:_____

Not Guilty: No:___ Yes:___ explain:_____

Do not care what anyone thinks:_____

99. Is there any matter not covered in this questionnaire that you think is important, or are concerned the Judge or Parties should know? No___ Yes:___ Please explain if yes: _____

100. Besides the Judge and Lawyers in this case, who if anyone assisted you filling this questionnaire out, or read it over?

No one:_____

Someone did help or review:_____

101. Have you answered all questions truthfully and honestly? Yes___ No___