

## JUROR QUESTIONNAIRE

Each juror who is seated in the jury box will be asked to answer the following 42 questions, beginning with the juror in seat number 1. Please do not read the questions aloud, that is not necessary. Simply state the number of the question and answer each question, one after the other, in a loud clear voice. Depending on your answer, we may ask you follow-up questions. When you are finished answering all the questions, we will move on to the next seated juror until every juror has had the opportunity to answer.

1. A. ***Without telling us your address***, in what neighborhood do you live?  
For example, Upper East Side, Lower West Side, Inwood, etc.  
B. How long have you lived there?  
C. Are you a native New Yorker? If not, where did you live previously?
2. A. What do you do for a living?  
B. How long have you been doing that?  
C. If you are retired, please tell us what you did before you retired.
3. A. Who is your current employer?  
B. How large is your current employer?  
C. Are you self-employed or own your own business?  
D. Who was your prior employer?
4. What is your educational background? For example, high school diploma, college degree, graduate degree, etc.
5. A. Are you married?  
B. Have you ever been married?  
C. Do you have any children?
6. A. If you are married, or living with another adult, what does that person do for a living?  
B. If you have adult children, what do they do?
7. A. What do you like to do in your spare time?  
B. Do you have any interests or hobbies?

8. A. Do you participate in any organizations or advocacy groups?  
 B. Which ones?
9. A. Have you ever served on a jury before? If you did, please tell us how long ago that was and whether that was in Criminal Court, Civil Court, or Grand Jury.  
 B. ***Without telling us the verdict***, please tell us whether the jury reached a verdict.

10. Which of the following print publications, cable and/or network programs, or online media such as websites, blogs, or social media platforms do you visit, read, or watch? (*Read aloud:*)

- |  |   |
|--|---|
| <input type="checkbox"/> New York Times      | <input type="checkbox"/> Wall Street Journal      |
| <input type="checkbox"/> USA Today           | <input type="checkbox"/> New York Post            |
| <input type="checkbox"/> New York Daily News | <input type="checkbox"/> Newsday                  |
| <input type="checkbox"/> Huffington Post     | <input type="checkbox"/> Washington Post          |
| <input type="checkbox"/> CNN                 | <input type="checkbox"/> Fox News                 |
| <input type="checkbox"/> MSNBC               | <input type="checkbox"/> Newsmax                  |
|  | <input type="checkbox"/> MSN                      |
| <input type="checkbox"/> Google              | <input type="checkbox"/> Yahoo                    |
| <input type="checkbox"/> Facebook            | <input type="checkbox"/> Truth Social             |
| <input type="checkbox"/> X                   | <input type="checkbox"/> I do not follow the news |
| <input type="checkbox"/> Tik Tok             | <input type="checkbox"/> Other (name)             |

11. Do you listen to or watch podcasts? If so, which ones?
12. Do you listen to talk radio? If so, which programs?
13. Have you, a relative, or a close friend ever been the victim of a crime? If so, please briefly tell us what happened?

14. Have you, a relative, or a close friend ever been employed by a law enforcement agency? For example, the police, FBI, District Attorney's Office, Department of Correction, etc.
15. Have you, a relative, or a close friend ever been employed by a federal, state, or any local government, including but not limited to the State of New York?
16. Have you, a relative, or close friend ever been employed in the accounting or finance field?
17. Have you, a relative or close friend ever had any education, training, or work experience in the legal field, including but not limited to practicing criminal or civil law?
18.
  - A. Have you, a relative, or close friend had any experience or interaction with the criminal justice system, including a police officer or other type of law enforcement agent, which caused you to form an opinion, whether positive or negative, about the police or our criminal justice system?
  - B. If so, what was that experience?
  - C. Would that experience prevent you from being a fair and impartial juror in this case?
19. Have you, a relative, or a close friend ever been accused or convicted of committing a crime?
20. Do you, a relative, or a close friend have a pending criminal case?
21.
  - A. Do you have any political, moral, intellectual, or religious beliefs or opinions which might prevent you from following the Court's instructions on the law or which might slant your approach to this case?
  - B. Do you have any political, moral, intellectual or religious beliefs or opinions that would interfere with your ability to render a verdict in this criminal case?

22. Do you have a health condition that might interfere with your ability to be here on the appointed days and times or otherwise prevent you from serving as a juror?
23. *Without telling us the name(s)*, do you take any medication that would prevent you from being able to concentrate or pay attention during the proceedings or during the deliberations?
24. Court proceedings normally end around 4:30 in the afternoon though on rare occasions, we might work beyond that. Would your schedule and responsibilities permit you to work later if it were absolutely necessary to complete that day's work?
25. Do you practice a religion that would prevent you from sitting as a juror on any particular weekday or weeknight?
26. Can you give us an assurance that you will be fair and impartial and not base your decision in this case upon a bias or prejudice in favor of or against a person who may appear in this trial, on account of that person's race, color, national origin, ancestry, gender, gender identity or expression, religion, religious practice, age, disability, sexual orientation or political views?
27. Can you promise to guard against allowing stereotypes or attitudes about individuals or about groups of people, referred to as an implicit bias, influence your decision?
28. Have you, a relative, or a close friend ever worked for any company or organization that is owned or run by Donald Trump or anyone in his family?
29.
  - A. Have you, a relative, or a close friend ever worked or volunteered for a Trump presidential campaign, the Trump presidential administration, or any other political entity affiliated with Mr. Trump?
  - B. Have you ever attended a rally or campaign event for Donald Trump?

- C. Are you signed up for or have you ever been signed up for, subscribed to, or followed any newsletter or email listserv run by or on behalf of Mr. Trump or the Trump Organization?
  - D. Do you currently follow Donald Trump on any social media site or have you done so in the past?
  - E. Have you, a relative, or a close friend ever worked or volunteered for any anti-Trump group or organization?
  - F. Have you ever attended a rally or campaign event for any anti-Trump group or organization?
  - G. Are you signed up for or have you ever been signed up for, subscribed to, or followed any newsletter or email listserv run by or on behalf of any anti-Trump group or organization?
  - H. Do you currently follow any anti-Trump group or organization on any social media site, or have you done so in the past?
30. Have you ever considered yourself a supporter of or belonged to any of the following:
- the QAnon movement
  - Proud Boys
  - Oathkeepers
  - Three Percenters
  - Boogaloo Boys
  - Antifa
31. Do you have any strong opinions or firmly held beliefs about whether a former president may be criminally charged in state court?
32. Do you have any feelings or opinions about how Mr. Trump is being treated in this case?
33. Can you give us your assurance that you will decide this case solely on the evidence you see and hear in this courtroom and the law as the judge gives it?
34. Do you have any strong opinions or firmly held beliefs about former President Donald Trump, or the fact that he is a current candidate for president that would interfere with your ability to be a fair and impartial juror?

35. Have you read (or listened to audio) of any of the following books or podcasts by Michael Cohen or Mark Pomerantz? If so, please let us know if what you have heard or read affects your ability to be a fair and impartial juror in this case.

Disloyal: A Memoir (2020)     Revenge (2022)

Mea Culpa (the podcast)     People Vs. Donald Trump (2023)

36. The defendant in this case has written a number of books. Have you read (or listened to audio) of any one or more of those books? If so, which ones?

37. Do you have any opinions about the legal limits governing political contributions?

38. Can you promise to set aside anything you may have heard or read about this case and render your verdict based solely on the evidence presented in this courtroom and the law as given to you by the judge?

39. Can you give us your absolute assurance that you will refrain from discussing this case with anyone in any manner and from watching, reading, or listening to any accounts of this case during the pendency of the trial?

40. Can you assure us that you will follow the judge's instructions on the law, including instructions on the definition of reasonable doubt and the presumption of innocence?

41. The United States Constitution provides that a defendant has no burden to introduce any evidence or to testify in a criminal case. If Mr. Trump chooses not to testify or to introduce any evidence, can you give us your assurance that you will not hold that against him?

42. Is there any reason, whether it be a bias or something else, that would prevent you from being fair and impartial if you are selected as a juror for this case?