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IN THE SECOND JUDICIAL DISTRICT COURT  
IN AND FOR DAVIS COUNTY, STATE OF UTAH

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STATE OF UTAH,	:	
Plaintiff,	:	PROPOSED JURY QUESTIONNAIRE
	:	
Vs.	:	
	:	
EDWARD LEWIS OWENS,	:	
Defendant	:	Case No.: 071700489
	:	
	:	Judge: Hansen

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**COMES NOW** the Defendant by and through his attorney Michael P. Studebaker, and hereby requests that the Court incorporate the following as the jury questionnaire in the above entitled case.

**JURY QUESTIONNAIRE**

Please answer each question in this questionnaire. The answers you give to the questions will save a great deal of time for the judge, the lawyers, and you. Remember, your answers are given under oath and must be truthful. Your best effort is needed. Please print or write your responses legibly.

Please answer as briefly and completely as possible in the blank space provided for the question involved. If you need additional space to complete an answer, please use the blank sheet to complete an answer, please write down the number you are answering, then finish your answer. If you do not understand a question you may indicate that on the questionnaire.

The sole purpose of this questionnaire is to gather information from you that is important to your service as a juror in this case. Your answer will enable the judge and the lawyers to select a fair and impartial jury to try this case.

Some of the questions may seem to invade your private affairs and personal beliefs, but your responses are essential to the jury selection process. The questions contained in your questionnaire are identical to those being answered by other prospective jurors.

We thank you for your attention and your efforts to give accurate and candid responses. While the questionnaire is lengthy, it is designed to shorten the selection process.

In this matter the Defennat, Edward Owens, has been charged with the murder of Karin Strom.

1. Are you familiar with the case that is the subject of this action? \_\_\_\_\_
2. What do you know about this case? \_\_\_\_\_
3. Your name: \_\_\_\_\_
4. Your age/date of birth: \_\_\_\_\_
5. Your gender: \_\_\_\_\_
6. Address: \_\_\_\_\_
7. How long have you been at that address? \_\_\_\_\_
8. Are you a citizen of the United States? \_\_\_\_\_
9. Are you are resident of Davis County, Utah? \_\_\_\_\_
10. Where else have you lived? \_\_\_\_\_
11. Are you able to read, speak and understand the English language?  
\_\_\_\_\_
12. Have you ever been convicted of a felony?  
\_\_\_\_\_
13. Do you have any difficulty seeing? \_\_\_\_\_
14. Do you have any difficulty hearing? \_\_\_\_\_
15. Is your health generally good? \_\_\_\_\_

16. Do you have any medical condition that would affect your ability to serve as a juror in this case?

\_\_\_\_\_

17. Are you presently under a doctor's care? \_\_\_\_\_

18. Are you using any prescription medications that have an affect on your ability to concentrate or sit for extended periods of time? \_\_\_\_\_

19. Do you suffer from any medical or physical condition that would make it uncomfortable for you to sit, listen and concentrate for extended periods of time? \_\_\_\_\_

20. Marital Status: \_\_\_\_\_

21. Where were you born? \_\_\_\_\_

22. If married, spouse's name. \_\_\_\_\_

23. Spouse's age? \_\_\_\_\_

24. What is your native language? \_\_\_\_\_

25. What is your spouse's native language? \_\_\_\_\_

26. Do you have children? \_\_\_\_\_

27. What are your children's ages? \_\_\_\_\_

28. Do your children live with you? \_\_\_\_\_

29. How many children under age 18 live with you? \_\_\_\_\_

30. What schools do they attend? \_\_\_\_\_

31. Do you or does any family member, have any special knowledge, education or interest in any of

the following areas?

S = Self F= Family Member (Circle all that apply)

S F Psychology (If yes, explain) \_\_\_\_\_

S F Law (If yes, explain) \_\_\_\_\_

S F Medicine (If yes, explain) \_\_\_\_\_

S F Social Work (If yes, explain) \_\_\_\_\_

S F Science (If yes, explain) \_\_\_\_\_

S F Law Enforcement (If yes, explain) \_\_\_\_\_

S F Forensic Science (If yes, explain) \_\_\_\_\_

32. Did you graduate from high school? \_\_\_\_\_

33. In what year? \_\_\_\_\_

34. If you did not graduate from high school, what is the highest grade completed? \_\_\_\_\_

35. Have you attended a college or university? \_\_\_\_\_

36. If yes, which college or university? \_\_\_\_\_

37. What was your major? \_\_\_\_\_

38. Did you graduate from college? \_\_\_\_\_

39. What is your occupation? \_\_\_\_\_

40. Who is your employer? \_\_\_\_\_

41. How long have you been with your employer? \_\_\_\_\_

42. What are your duties at your employment? \_\_\_\_\_
43. Do you supervise others? \_\_\_\_\_
44. Is your spouse employed? \_\_\_\_\_
45. If so, what is your spouse's occupation? \_\_\_\_\_
46. Who is your spouse's employer? \_\_\_\_\_
47. Are you retired? \_\_\_\_\_
48. If so, what was your principal occupation? \_\_\_\_\_
49. Is your spouse retired? \_\_\_\_\_
50. If so, what was your spouse's principal occupation? \_\_\_\_\_
51. Will you suffer any severe financial hardship if selected to serve as a juror for approximately two weeks? \_\_\_\_\_
52. Are you a member any church or religious group? \_\_\_\_\_
53. If yes, which church or group? \_\_\_\_\_
54. Have you held any office or position of leadership in your religious group? \_\_\_\_\_
55. If yes, please list the positions you have held? \_\_\_\_\_
56. Do you belong to any social organizations? \_\_\_\_\_
57. If yes, which organizations? \_\_\_\_\_
58. List your hobbies or leisure time activities.
- \_\_\_\_\_

59. What magazines do you read? \_\_\_\_\_

60. What newspapers do you read? \_\_\_\_\_

61. If you are a reader of the newspaper, to which part or parts of the paper do you pay particular attention? (Please circle)

Headlines/front pages    Local/regional news    Comics    Business/financial news    Sports

Editorials    Crossword Puzzle    Obituaries    Want-Ads

Other (specify) \_\_\_\_\_

62. Do you rely on television, radio, or newspapers for your news? \_\_\_\_\_

63. Do you believe that news reports in the above media are always accurate? \_\_\_\_\_

64. Have you ever belonged to any group whose goals were to make changes in the criminal justice system? \_\_\_\_\_

65. If yes, which groups? \_\_\_\_\_

66. Have you supported financially or otherwise any organization which supports victims rights? \_\_\_\_\_

67. How would you characterize your political beliefs? \_\_\_\_\_

68. Have you ever been the victim of a crime? \_\_\_\_\_

69. Was anyone ever charged? \_\_\_\_\_

70. Was there a trial? \_\_\_\_\_

71. What was the outcome? \_\_\_\_\_
72. As a result of your experience as a victim, do have any negative feelings towards anyone in the legal system? \_\_\_\_\_
73. If your answer is yes, whom? \_\_\_\_\_
74. Have you ever been a witness to a crime? \_\_\_\_\_
75. If yes, what was the crime? \_\_\_\_\_
76. Was anyone ever charged with the crime? \_\_\_\_\_
77. Was there a trial? \_\_\_\_\_
78. If yes, were you called upon to testify? \_\_\_\_\_
79. What was the outcome? \_\_\_\_\_
80. Do you have any negative feelings toward anyone as a result of your being a witness?  
\_\_\_\_\_
81. If so, explain. \_\_\_\_\_
82. Have you ever been arrested? \_\_\_\_\_
83. When? \_\_\_\_\_
84. Were you charged with any crime? \_\_\_\_\_
85. What Crime? \_\_\_\_\_
86. What was the outcome? \_\_\_\_\_



87. Do you have any negative feelings towards anyone as a result of that experience?

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88. Do you feel any resentment towards the legal system, the participants, or the process generally as a result of that experience? \_\_\_\_\_

89. Has anyone with whom you have been closely acquainted ever been the victim of a crime?

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90. When? \_\_\_\_\_

91. What crime? \_\_\_\_\_

92. Was anyone ever charged with the crime? \_\_\_\_\_

93. Was there a trial? \_\_\_\_\_

94. What was the outcome? \_\_\_\_\_

95. Do you have any negative feelings towards anyone other than the offender as a result of that person being the victim of a crime? \_\_\_\_\_

96. Do you have any negative feelings towards the legal system, the participants, or the process generally as a result of that person being a victim of a crime? \_\_\_\_\_

97. Have you ever been called to serve on a jury? \_\_\_\_\_

98. If yes, what kind of case? \_\_\_\_\_

99. What was the outcome? \_\_\_\_\_

100. Were you satisfied with the result? \_\_\_\_\_

101. Why or why not? \_\_\_\_\_

102. Do you have any negative feelings toward anyone as a result of your being a juror in a case?

\_\_\_\_\_

103. If so, explain. \_\_\_\_\_

104. Do you have relatives or close friends who now work, who have in the past worked for any law enforcement agencies (e.g. sheriff, police, FBI, etc.)? \_\_\_\_\_

105. If so, what is your relationship? \_\_\_\_\_

106. Do you feel law enforcement should evaluate all evidence in a case, or just enough to locate a viable suspect? Please explain. \_\_\_\_\_

**DO YOU UNDERSTAND THAT SOMETIMES EVIDENCE KNOWN TO THE POLICE, PROSECUTOR, OR DEFENSE ATTORNEY THAT CAN BE FAVORABLE TO EITHER SIDE WILL NOT BE HEARD BY THE JURY DUE TO RULES OF EVIDENCE?**

107. Do you feel that police investigation policies and protocols should be followed exactly during a crime scene investigation? Please explain.

\_\_\_\_\_

**DO YOU FEEL SOMEONE SHOULD BE FOUND NOT GUILTY DUE TO A POLICE ERROR OR OMISSION IF THERE IS STILL EVIDENCE TO CONVICT BEYOND A REASONABLE DOUBT?**

108. Do you have any negative feelings or do you feel any resentment toward people who are

accused of crimes?

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109. Do you believe people who are charged with crimes are always guilty of the crimes charged?

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110. Do you believe people who are charged are usually guilty of the crimes charged?

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**DO YOU BELIEVE POLICE ARREST AND PROSECUTORS CHARGE PEOPLE  
WITHOUT EVIDENCE JUST TO CONVICT SOMEONE OF A CRIME?**

111. Do you agree with the principle that anyone charged with a crime must be proven guilty beyond a reasonable doubt (**NOT BEYOND ANY POSSIBLE DOUBT**) before they can be convicted of the crime? \_\_\_\_\_

112. What does the statement identified in question #111 mean to you?

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113. Does the mere fact that Ed Owens is charged with this offense in the Information cause you to believe that he is probably guilty as charged? \_\_\_\_\_

114. Do you now presume Ed Owens to be innocent of the crime charged? \_\_\_\_\_

115. Do you assume that Ed Owens is probably guilty of a crime simply because he has been charged with a crime?

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116. Do you feel that Ed Owens has, or should have, any obligation to prove his innocence?

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117. Do you feel it is unfair to require the state to prove Ed Owens' guilt beyond a reasonable doubt?

**DO YOU FEEL THE STATE SHOULD HAVE TO PROVE ED OWENS' GUILT BEYOND ANY POSSIBLE DOUBT, NO MATTER HOW SPECULATIVE OR IMAGINARY, IN ORDER FOR YOU TO FIND HIM GUILTY OF THE CRIME CHARGED?**

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118. Do you understand that Ed Owens has no obligation to testify?

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119. Do you nevertheless feel he should come forward and testify? \_\_\_\_\_

120. If, after hearing the evidence, you came to the conclusion that the prosecution had not proven the guilt of Ed Owens beyond a reasonable doubt, and you found that a majority of the jurors believed Ed Owens was guilty, would you change your verdict only because you were in the minority?

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121. How do you feel about defense attorneys? \_\_\_\_\_

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122. Do you feel that defense attorneys are sometimes unethical in defending their clients? \_\_\_\_\_

123. If so, please explain. \_\_\_\_\_

\_\_\_\_\_

124. How do you feel about prosecutors? \_\_\_\_\_

\_\_\_\_\_

125. Do you think that a prosecutor would ever charge an innocent person with a crime? \_\_\_\_\_

126. If so, please explain. \_\_\_\_\_

\_\_\_\_\_

127. Do you have any personal feelings about sitting in judgment of another person that would make it difficult for you to make a decision in this case? \_\_\_\_\_

128. Are you acquainted with anyone else who has been called to jury service in this case?

\_\_\_\_\_

129. If so, who? \_\_\_\_\_

130. Are you acquainted with anyone on the list in Exhibit A? \_\_\_\_\_

131. If so, please identify each person and the nature of your acquaintance.

\_\_\_\_\_

132. Do you feel that you would be more or less inclined to believe the testimony of a law enforcement officer than the testimony of other witnesses simply because he/she is a law

enforcement officer? Explain.

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133. Do you feel that you would be less inclined to believe the statement or testimony of a person accused of a crime than the testimony of other witnesses simply because he/she has been charged with a crime? \_\_\_\_\_

134. If yes, please explain. \_\_\_\_\_

135. What do you know about DNA science and/or evidence?

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136. Do you feel that in order to convict a person of a crime that there must be more evidence besides DNA? \_\_\_\_\_

137. Please indicate the level of your agreement or disagreement with the following statements. The response options are: 1 = strongly disagree; 2 = disagree; 3 = neutral; 4 = agree; 5 = strongly agree. (circle the number which reflects your level of agreement/disagreement)

Expert witnesses should be believed because they know so much about their field.

1      2      3      4      5

Expert witnesses will tell the lawyer what the lawyer wants to hear.

1      2      3      4      5

Some expert witnesses just testify to get a paycheck.

1      2      3      4      5

DNA evidence clearly proves guilty or innocence

1      2      3      4      5

138. Is there anything you feel would make it difficult for you to be fair and impartial if selected as a juror in this case? \_\_\_\_\_

139. If so, please explain. \_\_\_\_\_

\_\_\_\_\_

140. Do you feel that your decision in this matter will be criticized by your family, your friends, your church or church members, or others? \_\_\_\_\_

141. If so, would such criticism be of concern to you? \_\_\_\_\_

142. Would such criticism influence your deliberation? \_\_\_\_\_

143. Would it affect how you might vote on the issues of this case and the guilt or innocence of any party? \_\_\_\_\_

The Defendant in this matter is Edward Owens. He is accused of murdering Karin Strom in 1980.

144. Have you read, seen or heard any news reports or articles or other information about this case? \_\_\_\_\_

145. When was the last time you read any articles or saw any television reports about the Owens case? \_\_\_\_\_

146. Have you ever expressed an opinion to anyone about whether you believe Ed Owens is or is not guilty of any of the act charged? \_\_\_\_\_

147. Has anyone else ever expressed an opinion to you about whether they believe Ed Owens is guilty or not guilty of the acts charged? \_\_\_\_\_

148. Have you formed an opinion of the guilt or innocence of Ed Owens as a result of what you have heard, read or seen about this case? \_\_\_\_\_

149. If you have formed or expressed an opinion regarding the guilt or innocence of Ed Owens, what is the opinion and upon what is that opinion based? \_\_\_\_\_

150. Do you have any negative feelings towards any person as a result of what you have heard, read or seen in the news media about this case? \_\_\_\_\_



151. Have you discussed this case with anyone? \_\_\_\_\_

152. If you were in the place of one of the parties to this case, is there any reason that you would not want yourself to sit as a juror? If your answer is yes, please briefly explain.

\_\_\_\_\_

153. Some people who are called for possible jury service would like to be chosen to serve on a jury, while others would really rather not be chosen. How do you personally feel about this on a scale of 1 to 5? (Circle appropriate number.)

1 Very strongly want to serve

2 Somewhat want to serve

3 Indifferent

4 Opposed to serve

5 Strongly opposed to serve

154. Do you have difficulty making decisions in your every day life? \_\_\_\_\_

155. Do you have difficulty making decisions in important matters? \_\_\_\_\_

156. Are you accustomed to making important decisions that affect others? \_\_\_\_\_

157. Do you watch Television? If so, what sort of television programming do you prefer to watch?

\_\_\_\_\_

158. Have you ever had any dealings with the Davis County Attorney's Office? If so, please explain. \_\_\_\_\_

159. Have you ever thought that the courts are too “soft” on those charged with and/or convicted of crimes. \_\_\_\_\_

160. Have you ever thought the courts are too “hard” on those charged with and/or convicted of crimes. \_\_\_\_\_

161. Do you have any negative feelings or do you feel any resentment toward people who are accused, but not convicted of crimes? \_\_\_\_\_

162. Is there anything about you or your background which has not been revealed but which should be known in order for the parties to evaluate you as a juror? \_\_\_\_\_

163. If there is something in relation to question 148, please explain it on the following line:

\_\_\_\_\_

164. Is there anything which you would like to discuss with the judge outside the hearing of the other jurors which you think might affect your ability to sit on this jury? \_\_\_\_\_

(Print Name) declare, under penalty of perjury, that the foregoing answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief.

Dated this \_\_\_\_ day of October, 2007.

(Signature)

**EXHIBIT “A”**

## This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

DATED this \_\_\_\_\_ day of October, 2007.

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Michael P. Studebaker  
Attorney for Defendant

**CERTIFICATE OF MAILING**

I certify that I mailed or hand delivered a true and correct copy of the above and foregoing to the Davis County Attorney's Office 800 W. State St. P.O. Box 769, Farmington, UT 84025 postage prepaid this \_\_\_\_\_ day of October, 2007.

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Michael P. Studebaker  
Attorney for Defendant

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