

**DAVID MUELLER, PLAINTIFF v. TAYLOR SWIFT, FRANK BELL, AND ANDREA SWIFT,  
DEFENDANTS, CIVIL ACTION No. 1:15-CV-01974-WJM-KLM**


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**JUROR QUESTIONNAIRE FOR JURY SELECTION  
AUGUST 7, 2017**

Please complete this questionnaire. It will assist the lawyers and myself in fairly selecting a jury for this civil case.

You are sworn to give true and complete answers to all questions on this questionnaire. Please answer all the questions to the best of your ability. There are no "right" or "wrong" answers. The questions that are asked are not designed to intrude on your privacy or to offend or embarrass you. If they do so, you have my apologies. However, the parties, the lawyers, and this Court have a right and an obligation to ask certain questions in order to ensure a fair trial for the parties to this case.

We, as citizens, have a responsibility and duty to support our unique system of jury trials in this country. Thank you in advance for your careful attention to the questions below, and for doing your part to support our system of justice.

  
\_\_\_\_\_  
William J. Martinez  
United States District Judge

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**DIRECTIONS:**

- 1. Provide complete and honest answers to all the questions below. There are no right or wrong answers, simply answer to the best of your ability.**
- 2. Do not show your questionnaire to anyone else other than Court staff.**
- 3. Do not discuss this questionnaire or your responses with anyone else, *including other prospective jurors* or court staff. Do not communicate in any way with anyone about the questions on this form, your answers, or anything you hear in court until the Judge tells you that you may.**
- 4. Do NOT do any research or look up anything on the Internet to answer these questions.**

5. Do **NOT** have any communication with anyone, or read anything about this case, or about the questions in this questionnaire, until the Judge tells you that you may. Do **NOT** e-mail, text, or use social media or any other means of communication to read or communicate about this case with anyone else. This includes any in-person communication, as well as posting, commenting, or entering into any discussion on any social media, blogs, or any other Internet forum (including any access to Facebook, Facebook Live, YouTube, Twitter, Snapchat, Periscope, Vine, LinkedIn, Instagram, Google+ or any other method of messaging or communication) regarding anything to do with this questionnaire or this case.
  
6. It is important that you follow these directions. If you violate any portion of these directions you may be held in contempt of Court. If the Court must summon additional jurors or extend the trial proceedings as a result of any violation of these directions, you may be personally required to pay the costs for such additional proceedings.
  
7. Your completed questionnaire will only be read by the Court, the parties, their attorneys and those working with them for use in jury selection. The parties and lawyers have a right to review your answers to these questions in order to ensure a fair trial. Any copies of this questionnaire that are made part of the public record in the future will be anonymous, with your name removed.
  
8. If you feel you cannot answer any question in the space provided, Court staff will provide you with a blank piece of paper. Write the number of the relevant question before anything additional that you write.

Initial here to indicate that you have read the directions above: \_\_\_\_\_

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**Answer all of the questions below:**

1. Where do you currently live (what city or town)? \_\_\_\_\_
  - a. For how long have you lived there? \_\_\_\_\_
  - b. If you have lived anywhere else in the last five years, where?  
\_\_\_\_\_
  
2. What is your gender? \_\_\_\_\_
  
3. What is your current age? \_\_\_\_\_

4. Please identify any of the following which you use to describe your race and/or ethnicity.

African American

White

Asian

Other (please specify)

Native American /Alaska Native

Hispanic/Latino

5. Do you have any problems with language, hearing, your vision, or your health that could make it difficult for you to see, hear, and understand the testimony and evidence in this case, or to sit as a juror between today and next Thursday, August 17?

Circle One: Yes No

If "YES," please explain:

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6. The Courthouse is a non-smoking building. If you are a smoker, will you be able to go without taking any smoking break each day from approximately 8:45 a.m. until approximately 5:15 p.m.?

a. Circle One:

Yes, I can go all day without needing smoking breaks

No, I would need more frequent smoking breaks

Not Applicable

b. Would this affect your ability to concentrate on the testimony and evidence?

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

a. By whom are you employed, and for how long have you worked there?

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b. What are your job duties?

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c. What did you do before that, and for how long?

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8. Please describe your educational background?

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9. What is your marital status? \_\_\_\_\_

a. If married, by whom is your current spouse or partner employed, and what are his or her job duties?

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b. Have you been separated, divorced, or widowed for *less than five years*?

Circle One: Yes No Not Applicable

If "Yes," by whom was your former spouse(s) or partner(s) employed, and what are/were his or her job duties?

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10. Do you have any children? If yes, what are their ages and genders?

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11. Specialized training or background: Do you, or does anyone in your immediate family (meaning your spouse/partner and children) have specialized training or experience in any of the following areas?

a. Law, Police, Court or Legal System. Circle One: Yes No  
If "Yes," please explain:

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b. Media (radio, TV, newspaper, webcasting) Circle One: Yes No  
If "Yes," please explain:

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c. Music Industry (Circle One)? Circle One: Yes No  
If "Yes," please explain:

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12. Have you served as a juror in any prior court case(s)?

a. Circle One: Yes No

b. If "Yes," please answer each of the following questions with respect to every time you have previously served on a jury:

How many times have you served as a juror? \_\_\_\_\_

How long ago (for each time)?

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Where, and in what court(s)?

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What kind of case(s)?

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Were you ever the jury foreperson?

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Did you and the other jurors deliberate to a verdict?

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What was/were the result(s)?

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13. What magazines, newspapers, websites, or blogs do you read regularly?

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14. What are your primary sources of news? (check all that apply)

- Internet. Which web site(s)? \_\_\_\_\_
- Local TV news. Which station(s)? \_\_\_\_\_
- Cable news. Which station(s)? \_\_\_\_\_
- Radio. Which station(s)? \_\_\_\_\_
- Newspaper. Which one(s)? \_\_\_\_\_
- Other. Please explain: \_\_\_\_\_

15. Have you ever heard of, or do you know anything about, a lawsuit between a former Denver radio DJ, David Mueller (known on air as "Jackson"), and singer Taylor Swift?

Circle One: Yes No

a. If "Yes," what have you heard or what do you know?

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b. Where did you get that information? Please include all sources.

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16. Have you ever seen any pictures related to a lawsuit or dispute between David Mueller and Taylor Swift?

Circle One: Yes No

If "Yes," where? Please describe what you remember seeing, if anything?

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17. Have you formed any opinion about a lawsuit or dispute between David Mueller and Taylor Swift?

Circle One: Yes No

If "Yes," please explain:

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18. Do you have any opinion of David Mueller? If so, what is your opinion?

(Circle one, and briefly explain):

No opinion Very positive Positive Neutral Negative Very Negative

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19. Do you have any opinion of singer Taylor Swift?

(Circle one and briefly explain):

No opinion Very positive Positive Neutral Negative Very Negative

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20. Do you listen to Denver-area country radio station KYGO? Circle One: Yes No

a. Have you in the past? Circle One: Yes No

b. Have you ever considered yourself a fan of KYGO? Circle One: Yes No

c. Have you ever considered yourself a fan of the on-air KYGO personality "Jackson" (David Mueller)? Circle One: Yes No

If you answered "YES," to any of the above, please explain:

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21. Have you ever considered yourself a fan of Taylor Swift?

Circle One: Yes No

Please describe:

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22. Is anyone in your immediate family a fan of Taylor Swift?

Circle One: Yes No

Please describe:

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23. Which, if any, of the following have you done in the last two years?

Please circle all that apply:

- a. Listened to Taylor Swift on the radio?
- b. Watched any Taylor Swift video (including online)?
- c. Read a blog, magazine, or other news reporting about Taylor Swift?
- d. Purchased a Taylor Swift album?
- e. Paid money specifically to download or listen to Taylor Swift's music online?
- f. Intentionally listened to Taylor Swift through an online service that you pay for?
- g. Intentionally listened to Taylor Swift through a free online service?
- h. Gone to a Taylor Swift concert or performance?

If "Yes," how many concerts/performances have you attended, and please describe when and where:



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- i. Done something else related to Taylor Swift that you think the Court and the attorneys should know about?

Please briefly explain any answers you circled in Question #23, above:

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24. In a lawsuit between David Mueller and Taylor Swift would you have a bias for or against either Taylor Swift or David Mueller?

Circle One: Yes No

If "Yes," please explain:

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25. Did you attend a concert performed by Taylor Swift at the Pepsi Center in Denver on June 2, 2013?

Circle One: Yes No

26. The jurors in this case will be instructed that they must base their decisions entirely on the evidence produced in court, not from any outside source or preexisting opinions or attitudes. Can you set aside any opinions you may have developed as a result of anything you may have seen, heard, or read about this case before trial and decide this case **only** on the basis of evidence produced in Court and the instructions the judge will give?

Circle One: Yes No

If "No," please explain:

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27. If, as a juror on this case, you heard evidence that was in conflict with any information you learned before the trial, how would you resolve that conflict?

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28. Have you, your spouse/partner, or your children, ever been inappropriately touched?

Circle One: Yes No

If "Yes," please explain the situation, without using any names:

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*Note: Your answers on this questionnaire will remain anonymous except for review before trial by the Judge, the parties and the lawyers, who have a right to this information in order to select a fair jury.*

*If it would still make you highly uncomfortable to answer this question in writing, please write "Private," and the Judge will ask you about this question where others cannot hear.*

29. Have you, your spouse/partner, or your children, ever been wrongly accused of inappropriately touching someone?

Circle One: Yes No

If "Yes," please explain the situation, without using any names. If it would make you highly uncomfortable to answer this question in writing, please write "Private," and the Judge will ask you about this question where others cannot hear.

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30. Have you, your spouse/partner, or your children ever been wrongly accused of other wrongful or criminal conduct.

Circle One: Yes No

If "Yes," please explain the situation, without using any names. If it would make you highly uncomfortable to answer this question in writing, please write "Private," and

the Judge will ask you about this question where others cannot hear.

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31. Have you, your spouse/partner, or your children been convicted of a crime?

Circle One: Yes No

a. If "Yes," please explain the situation without using any names. If it would make you highly uncomfortable to answer this question in writing, please write "Private," and the Judge will ask you about this question where others cannot hear.

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b. If "Yes," is there anything about that experience that would prevent you from being fair to both sides in this case?

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32. Have you, your spouse/partner, or your children, ever been a plaintiff or a defendant in a civil court case?

Circle One: Yes No

a. If "Yes," please explain the situation.

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b. If "Yes," is there anything about that experience that would prevent you from being fair to both sides in this case?

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33. Have you, your spouse/partner, or your children ever been fired from a job.?

Circle One: Yes No

a. If "Yes," please explain the situation, including how long ago it occurred.

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b. If "Yes," is there anything about that experience that would prevent you from being fair to both sides in a case where one party claims they were wrongfully fired?

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34. Is there anything else you believe the Court or the parties should know which might potentially be important to your possible role as a juror in this lawsuit or affect your ability to be fair to both sides?

Circle One: Yes No

If "Yes," please explain:

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35. The following people and entities are or may be involved in this case, as parties, witnesses, lawyers, or Court staff. Please indicate whether you know any of these people or entities, and if so, explain how.

<u>Name</u>	<u>Do you know this person (circle one)? If "YES," explain how.</u>
David Mueller (sometimes known as "Jackson" on KYGO Radio).	Yes No
Jeffrey Opp	Yes No
Bob Call	Yes No
Hershel Coomer (sometimes known as "Eddie Haskell")	Yes No
Shannon Melcher	Yes No
Tracy Dixon	Yes No

Ryan Kliesch (sometimes known as "Ryno" on KYGO radio)	Yes	No
John Dimick	Yes	No
Lincoln Financial Group	Yes	No
Entercom Communications	Yes	No
Bonneville Radio	Yes	No
Evans & McFarland, LLC	Yes	No
Gabe McFarland	Yes	No
Cyd Hunt	Yes	No
Gina Bowermaster	Yes	No
Taylor Swift	Yes	No
Andrea Swift	Yes	No
Frank Bell	Yes	No
Stephanie Simbeck	Yes	No
Erica Worden	Yes	No
Greg Dent	Yes	No
Gabby Liddicoat	Yes	No
Lorraine Bayard de Volo	Yes	No
Kevin Call	Yes	No
Venable LLP	Yes	No
Douglas Baldridge	Yes	No
Danielle Foley	Yes	No
Katie Wright	Yes	No
Judge William J. Martínez	Yes	No
Deborah Hansen	Yes	No
Mary George	Yes	No
Cassandra Hill	Yes	No

Nathan Foster	Yes	No
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**READ THIS:**

1. I declare that the above information is true, to the best of my knowledge.
2. I understand that I cannot communicate with anyone about the content or questions on this questionnaire, or my answers.
3. I understand that I cannot communicate with anyone, conduct any research, or look up anything on the Internet about anything related to this case until the Judge tells me otherwise. I understand that this includes ANY communication, with anyone, or looking things up on the Internet, by social media or any other means (including but not limited to posting, commenting, or discussion on any blogs, listening to any podcasts, reading or posting on Facebook, or communicating via Facebook Live, YouTube, Twitter, Snapchat, Periscope, Vine, LinkedIn, Instagram, Google+, or any other method of communication).

**Signature:** \_\_\_\_\_

**Print Your Name:** \_\_\_\_\_

**Dated:** \_\_\_\_\_