

VOLUME SEVEN OF SEVEN

STATE OF SOUTH CAROLINA

In The Supreme Court

APPEAL FROM ANDERSON COUNTY

Alexander S. Macaulay, Circuit Court Judge

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S.C. Supreme Court

THE STATE,

RESPONDENT,

V.

RAYMONDEZ RIVERA,

APPELLANT

RECORD ON APPEAL

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VOLUME SEVEN
PAGES 3002-3237

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THE STATE OF SOUTH CAROLINA)
IN THE COUNTY OF ANDERSON)

IN THE COURT OF GENERAL SESSIONS

The State of South Carolina)

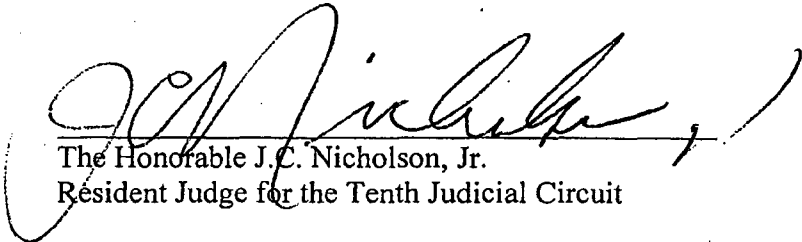
vs.)

CASE NO.: 2007-GS-04-649

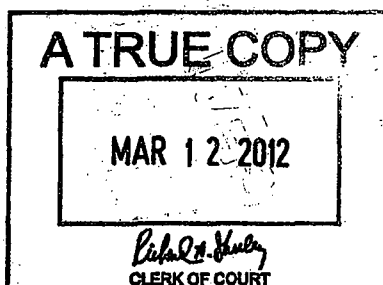
Ramondeze Rivera)

In the above-entitled action, this Court appoints John Delgado, Esquire, of Bluestein, Nichols, Thompson, & Delgado, as lead counsel to represent the Defendant, Ramondeze Rivera, during this death penalty trial. This Court appoints R. Daniel Day, Jr., Esquire, of the Law Office of R. Daniel Day, as second chair to represent the Defendant, Ramondeze Rivera, during this death penalty case. A trial in the above-entitled action will be held the weeks of December 1, 2008 and December 8, 2008.

IT IS SO ORDERED!


The Honorable J.C. Nicholson, Jr.
Resident Judge for the Tenth Judicial Circuit

July 1, 2008
Anderson, South Carolina



FILED-CLERK'S OFFICE
ANDERSON SC
2008 JUL -1 P 1:24
COMMON PLEAS AND
GENERAL SESSIONS.

STATE OF SOUTH CAROLINA)
COUNTY OF ANDERSON)

IN THE COURT OF GENERAL
SESSIONS

STATE OF SOUTH CAROLINA)

NOTICE OF INTENT TO SEEK
DEATH PENALTY

Vs.)

RAYMONDEZE LAMON RIVERA,)

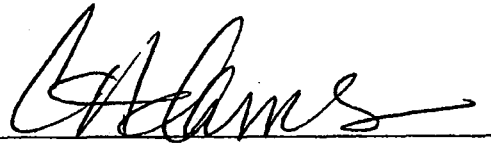
2007-GS-04-649

Defendant.)

TO: RAYMONDEZE LAMON RIVERA , DEFENDANT, and ROBERT GAMBLE,
ATTORNEY FOR DEFENDANT:

PLEASE TAKE NOTICE that the State of South Carolina, by and through the
Office of the Solicitor for the Tenth Judicial Circuit, intends to seek the death penalty
during the trial of the above indictment.

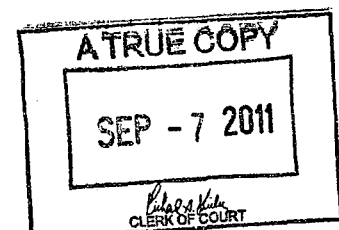
This Notice is given pursuant to Section 16-3-20, Code of Laws of South Carolina
(1976), as amended.



Chrissy Adams, Solicitor
Tenth Judicial Circuit

Anderson, South Carolina
2/13, 2008

FILED-CLERK'S OFFICE
ANDERSON SC
2008 FEB 13 P 4:03
COMMON PLEAS AND
GENERAL SESSIONS



The Supreme Court of South Carolina

The State Of South Carolina,

Prosecutor

v.

Raymondeze Rivera,

Defendant

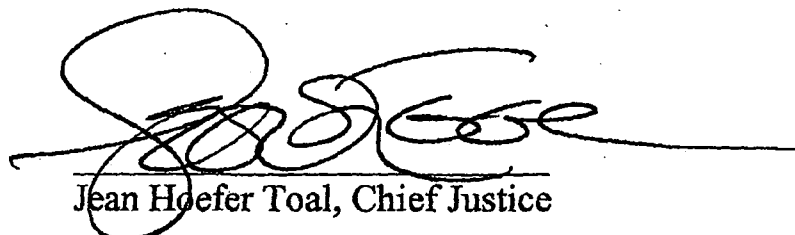
Anderson County
2007-GS-04-0649

ORDER

By Order dated March 11, 2007, the Honorable J. C. Nicholson, Jr. was vested with exclusive jurisdiction to hear and dispose of the above case. I find that the order should be rescinded and the case reassigned.

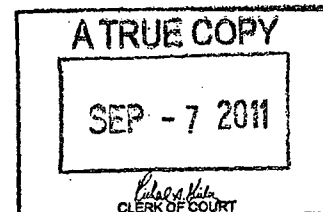
The Order dated March 11, 2007 is rescinded and the Honorable Alexander S. Macaulay is vested with exclusive jurisdiction to hear and dispose of the above case. Judge Macaulay shall decide all matters pertaining to this case, including motions to appoint or relieve counsel.

IT IS SO ORDERED.



Jean Hoefer Toal, Chief Justice

December 21, 2009
Columbia, South Carolina



POTENTIAL DEATH PENALTY CASE

STATE OF SOUTH CAROLINA

IN THE COURT OF GENERAL SESSIONS
TENTH JUDICIAL CIRCUIT

COUNTY OF ANDERSON

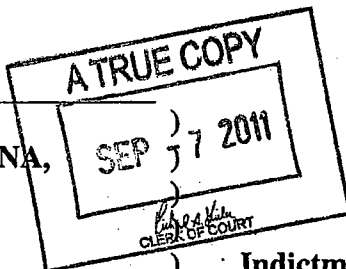
STATE OF SOUTH CAROLINA,

Plaintiff,

v.

RAYMONDEZE RIVERA,

Defendant.



Indictment No.s: 2007-GS-04-0649

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 ANDERSON SC
 2009 DEC 15 A 11:
 GENERAL SESSIONS

**BRIEF IN SUPPORT OF MOTION TO SUPPRESS DEFENDANT'S STATEMENT DUE
 TO THE STATEMENT BEING PROCURED BY A PROMISE FROM THE
 PROSECUTOR AND THEREFORE INVOLUNTARY**

Raymondeze Rivera, through undersigned counsel, respectfully moves this Court, pursuant to Fifth, Sixth, Eighth and Fourteenth Amendments to the United States Constitution, Articles I, § 3, 14, and 15, of the Constitution of South Carolina, as well as the jurisprudential authorities cited below, and all other applicable constitutional, statutory, treaty, customary international law, evolving international standards, and jurisprudential authority to suppress the Defendant's statement as it was procured through a promise of reward and therefore involuntary.

STATEMENT OF FACTS

The Defendant was arrested and detained for the offenses at bar in December 2006, in Douglasville, Georgia.¹ Lieutenant John Zamberlin of the Anderson City Police Department

¹ The summary of facts are a paraphrasing of testimony given during a "Jackson-Denno" hearing due to the fact that the transcript is not yet available.

attempted to interview the Defendant shortly after his detention. The Defendant invoked his right to remain silent and requested an attorney. This invocation of the Defendant's Fifth and Sixth Amendment rights, and the Defendant's refusal to speak or give a statement to the officers was memorialized in writing on what is generally referred to as a waiver of rights form.

Several days after the attempted interview and invocation, Lieutenant Zamberlin returned to Georgia with another officer to take a set of fingerprints from the Defendant. During this interaction the Defendant indicated that he would give a statement and fully cooperate with the authorities if three (3) of the Defendant's wishes were granted. The Defendant indicated that he wanted the prosecution to guarantee in writing that the prosecution would seek the death penalty in his case, that he be allowed to see a Chaplain upon his return to South Carolina, and that he be allowed to live in a private cell without any roommates during his pretrial incarceration. These demands were put in writing and signed by the Defendant. Lieutenant Zamberlin returned to South Carolina after promising the Defendant that he would relay the Defendant's requests to the Solicitor.

The Defendant testified regarding his initial invocation of his rights to remain silent and his three requests at a "Jackson-Denno" hearing on December 2, 2009. Specifically, the Defendant testified regarding his reasons for making the request for a private jail cell during his pretrial incarceration in Anderson County.

Mr. Rivera indicated that the request for a private cell was to ensure his physical safety. Further, the Defendant testified that he had been incarcerated in the past at the Fulton County jail, the Dekalb County jail, and at the Lee Arrendale prison at Alto, Georgia. The Defendant testified that he had witnessed extreme violence at these facilities including beatings, stabbings, rapes, and killings. Also, the Defendant testified that he requested to be placed in segregation while at Lee Arrendale due to homosexual threats being made by inmates and that these threats

were specifically directed at the Defendant. It was also during his time at Lee Arrendale when a young man named Willie Boatwright was beaten, gang raped, and murdered by violent inmates.

In his testimony, the Defendant indicated that not only did he fear the typical or general inmate violence during his pretrial incarceration at the Anderson County Detention Center, but that he specifically feared violent reprisals from inmates who might be friends or family of the victims.

The Defendant testified that the request for a private cell was extremely important to him due to his fears of inmate violence. On a scale of one to ten, ten being absolutely essential, the Defendant indicated that securing a private cell was a "ten."

While in this state of fear regarding inmate retaliation and violence upon his imminent return to Anderson County, Lieutenant Zamberlin returned to Georgia with a letter addressed to the Defendant and signed by the Tenth Circuit Solicitor, Chrissy Adams. The letter indicated that the death penalty would be pursued if supported by the evidence, and that arrangements had already been made to provide a meeting with a Chaplain and to provide that the Defendant have a private cell upon his delivery to the Anderson County Detention Center.

Upon receipt of this letter, and the written promise of a private cell, the Defendant immediately abandoned his commitment to remain silent, was fully cooperative with Lieutenant Zamberlin, and gave a detailed confession regarding the incidents at issue.

**DEATH PENALTY PROSECUTIONS ARE SUBJECT TO A "HEIGHTENED
RELIABILITY STANDARD."**

Death penalty prosecutions are subject to the requirement that there be a "heightened reliability" in the resulting sentence. Johnson v. Mississippi, 486 U.S. 578, 584 (1988) (citations omitted). Furthermore, when a defendant's life is at stake, a court must be "particularly sensitive

to insure that every safeguard is observed.” Gregg v. Georgia, 428 U.S. 153, 187 (1976). Our system of justice must go “to extraordinary measures to ensure that the prisoner [facing the possibility of being] sentenced to be executed is afforded process that will guarantee, as much as is humanly possible, that the sentence was not imposed out of whim, passion, prejudice, or mistake.” Eddings v. Oklahoma, 455 U.S. 104, 118 (1982) (O’Connor, J., concurring) (emphasis added). These “extraordinary measures” must be taken at both stages of any capital trial. Beck v. Alabama, 447 U.S. 625, 638 (1980).

The Supreme Court of the United States has declared that a defendant is entitled to a reliable determination as to the voluntariness of his statement before trial. Jackson v. Denno, 378 U.S. 368 (1964). The Defendant submits that this “reliable” determination of whether his statements were voluntary is subject to the “heightened reliability” requirement discussed above.

ALLOWING AN INVOLUNTARY STATEMENT TO BE USED AGAINST A DEFENDANT VIOLATES THE PRINCIPLES OF THE FIFTH AMENDMENT

Allowing an involuntary statement to be used against a Defendant violates the privilege against self incrimination found within the Fifth Amendment of the United States Constitution. Bram v United States, 168 U.S. 532 (1897). This privilege is made applicable to the States through the Due Process Clause of the Fourteenth Amendment to the United States Constitution. Malloy v. Hogan, 378 U.S. 1 (1964).

A STATEMENT MAY BE RENDERED INVOLUNTARY IF GOVERNMENT PROMISES RESULT IN A SUBJECTIVE BELIEF OF A HOPE OF REWARD OR ADVANTAGE

The Supreme Court of the United States has declared that a defendant’s statement is not voluntary if it is extracted by threats or violence, or if it was obtained by direct or indirect

promises, however slight. Hutto v. Ross, 429 U.S. 28 (1976) (citing Bram v. United States, 168 U.S. 532 (1897); see also Haynes v. Washington, 373 U.S. 503 (1962)(promise of visit with family rendered inadmissible the statement of defendant being held in isolation), United States v. Fay, 323 F.2d 65 (2nd Cir. 1963)(promise of visit with wife rendered inadmissible the statement of a defendant who underwent prolonged interrogation).

Courts are consistent in upholding this principle and have a long history of holding statements to inadmissible in accord with the rule stated above. State v. Peake, 291 S.C. 138 (1987)(statement involuntary due to promise to not seek the death penalty); State v. Pruitt, 286 N.C. 442 (1975)(statement involuntary when given after being told by officers that it would be harder on the defendant if he did not cooperate implying hope of lenient treatment if a statement was given); State v. Fuqua, 269 N.C. 223 (1967)(statement involuntary when made after promise that officer would testify that defendant was cooperative); State v. Stevenson, 212 N.C. 648 (1937)(statement involuntary due to officer's comments leading to defendant's hope of preventing his own lynching by giving statement). In re Joshua David C., 116 Md. App. 580 (indicating that something so seemingly small as a promise to buy a T-shirt for a defendant can be seen as a significant promise to a juvenile).

**A PROMISE REGARDING THE PERSONAL SAFETY OF THE DEFENDANT IS THE
TYPE OF PROMISE THAT RENDERS A STATEMENT INVOLUNTARY AND
INADMISSIBLE**

Courts have consistently held that promises touching upon the defendant's personal safety render a defendant's statement involuntary if given in return for such a promise. All such statements are, of course, inadmissible.

A strikingly similar case to the instant case is Arizona v. Fulminante, 499 U.S. 279 (1991). The Fulminante Court addressed promises to protect the Defendant from potential future violence from other inmates. An inmate, also an FBI informer, stated he could help protect the defendant from other inmates if the defendant gave the informer the full facts of the alleged crime. The Court declared that such a promise touching on the safety of the defendant regarding potential future violence from other inmates rendered the defendant's statement involuntary and inadmissible.

Another case very similar to the case at bar is that of United States v. McCullah, 76 F.3d 1087 (10th Cir. 1996). In this case a government agent indicated that he could provide some protection to the defendant from a potential future gang reprisal. The protection was offered to the defendant if he gave a statement to the government agent regarding the defendant's participation in a criminal offense. The McCullah Court also found that such a promise regarding the defendant's personal safety was of the magnitude to render the statement involuntary and inadmissible. See also Winder v. Maryland, 362 Md. 275 (2001)(statement involuntary due, in part, to promise to protect murder defendant from angered members of victim's community).

The Defendant, Mr. Rivera, has testified that the promise of a private cell was of great importance to him, because it went directly to his concerns for his physical safety regarding inmate violence. As in the cases discussed above, the Solicitor made a promise touching directly on Mr. Rivera's personal safety, and did so with the express agreement that the promise was in exchange for Mr. Rivera's statement. The resulting statement, as in the cases cited above, must be found to be involuntary and inadmissible.

A STATEMENT INDUCED BY A PROMISE IS INVOLUNTARY IF SO CONNECTED WITH THE INDUCEMENT AS TO BE A CONSEQUENCE OF THE PROMISE

In order for a statement induced by a government promise to be found involuntary, the statement must be so closely connected to the promise as to be a consequence of the promise. State v. Broome, 268 S.C. 99 (1977).

In the instant case there is no need to pause on the nexus between the promise and the statement. The Solicitor negotiated in writing with Mr. Rivera. These negotiations are not disputed. The Defendant promised to give a statement if the Solicitor would guarantee that three requests, including having a private jail cell in the Anderson County Detention Center, would be honored. Immediately upon receiving the Solicitor's written guarantee that the three requests would be honored, the Defendant gave the statements at issue. There could not be a closer nexus between the Solicitor's promise and the Defendant's statement.

THE STATE SHOULDERS THE BURDEN OF PROVING A STATEMENT TO BE VOLUNTARY BY THE PREPONDERANCE OF THE EVIDENCE, AND FAILURE TO PRODUCE SUCH EVIDENCE RENDERS THE STATEMENT INADMISSIBLE

The procedure for determining whether a Defendant's statement is involuntary or voluntary is a two-step procedure. First, the State must present evidence to the trial judge and prove, by the preponderance of the evidence, that the statement was in fact voluntarily made. If the trial judge finds that the state was able to present evidence indicating that the statement is voluntary, the statement may be published to the jury with a charge that the jury must find the statement to have been given voluntarily beyond a reasonable doubt. State v. Miller, 375 S.C. 370 (2008)(quoting Jackson v. Denno, 378 U.S. 368 (1964); see also State v. Broome, 268 S.C. 99 (1977).

ARGUMENT

In the case at bar, it is beyond dispute that a promise was made by the Solicitor in writing via a letter to the Defendant. Further, it is beyond dispute that the direct result of the promise was for the Defendant to abandon his previous position of wishing to remain silent and to give the statements at issue. Therefore, the sole issue to be determined by this Court is the subjective value that the Defendant placed on being protected from potential future inmate violence upon his delivery to the Anderson County jail.

The Defendant testified that the private cell and the protection he hoped it would offer was essential to him and a "ten" on a one to ten scale. The evidence offered by the Defendant indicates that the promise of a private cell was of the utmost value to the Defendant.

The State has offered no evidence whatsoever to prove that a private jail cell was not an extremely valuable and very significant promise made by the Solicitor to the Defendant. Therefore, the State has clearly not shouldered the burden of proving by the preponderance of the evidence that the statement was voluntary. The statement is therefore plainly inadmissible.

In short, the State has placed itself in this position when it chose to bargain with the Defendant in the dark. The Solicitor, when making written promises of a private jail cell, had no idea how valuable a private cell was to a man who had seen extreme violence while incarcerated, had been the target of homosexual threats while in prison, and feared violent reprisals from inmates who might know or be related to the victims.

The Solicitor's promise of a private jail cell was of extreme value to the Defendant, and this promise was directly related to the Defendant's concern for his personal safety regarding potential future inmate violence. The Solicitor has offered no evidence whatsoever to contradict these facts.

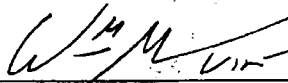
The Defendant's statement, given expressly in exchange for the Solicitor's promise of a private jail cell, must be found to be involuntary in accord with the similar cases cited above.

Wherefore, the Defendant respectfully requests:

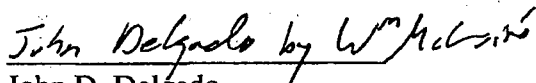
- 1) That the Defendant's statements at issue be suppressed; and
- 3) That the Court order such further relief as it deems proper.

Dated this 11th day of December, 2009.

Respectfully Submitted,



William Sean McGuire
State Bar No. 9722
Attorney, Capital Trial Division
South Carolina Commission on Indigent Defense
PO Box 11433
Columbia, SC 29211



John D. Delgado
Bluestein, Nichols, Thompson & Delgado
PO Box 7965
Columbia, SC 29202

DEATH PENALTY CASE

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON

IN THE COURT OF GENERAL SESSIONS
TENTH JUDICIAL CIRCUIT

STATE OF SOUTH CAROLINA,

Plaintiff,

v.

RAYMONDEZE RIVERA,

Defendant.

Indictment No.s: 2007-GS-04-0649

CERTIFICATE OF SERVICE

I, Natasha J. Holliday the undersigned, certify that I have served the foregoing document on the individual listed below by U.S. Mail to the following individual:

PERSON SERVED:

Christina T. Adams, Solicitor
10th Circuit Solicitor's Office
PO Box 8002
Anderson, SC 29622

DOCUMENTS:

Brief in Support of Motion to Suppress Defendant's Statement Due to the Statement being Procured by a Promise from the Prosecutor and therefore Involuntary

Dated this 11th day of December, 2009.

Respectfully Submitted,

Natasha J. Holliday

Natasha J. Holliday, Paralegal
SCCID, Capital Trial Division
1330 Lady Street
PO Box 11433
Columbia, SC 29211
(803) 734-7818

U.S. AND
GENERAL
SESSIONS

2009 DEC 15 A 11:12

FILED IN THE
CLERK'S OFFICE
ANDERSON SC

#29

(Qualified)

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

- Full Name: Brenda Sue Brown
- Age: 62 as of → Date of Birth [REDACTED]
- Any other names you have used: Brenda Mills (Maiden), Brenda Blackston
- Address [REDACTED]
- How long have you lived at your present address? 10 yrs
- Marital Status (please check)

Single <u> </u>	Married <u>✓</u> Years <u>22</u>
Separated <u> </u>	Divorced <u> </u> Years <u> </u>
Widowed <u> </u>	Never Married <u> </u>
Living with someone as a couple <u> </u>	Divorced and Remarried <u>22 years</u>
- If living with someone as a couple, please state your partner's name:
- Are you a citizen of the United States? Yes ✓ No
- Racial or ethnic group: Caucasian

COMMON PLEAS AND
GENERAL SESSIONS

DEC 31 A 11:43

FILED-CLERK'S OFFICE
ANDERSON SC

A TRUE COPY

MAR 12 2012

[Signature]
CLERK OF COURT

EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed
Employed full-time
Employed part-time
Working in the home

~~Unemployed/laid-off~~
~~Retired/student~~
Disabled/unable to work

2. Name of current employer:

N/A

3. What is your present occupation, title or profession?

N/A

4. Have you held any previous positions with the same employer?

N/A

5. Number of years employed as above: N/A

6. Are you the primary wage earner for your family? Yes: ___ No: ☒

7. Are you salaried or hourly employee? salaried: ___ hourly: ___

8. Do you rely on overtime pay to meet your monthly household expenses?
Yes: ___ No: ☒ N/A

9. Do you supervise other employees? Yes: ___ No: N/A

10. If YES, how many employees do you supervise? _____

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace? _____

12. Do you have a "second" job? YES ☒ NO

13. If YES, what is it and where are you employed? _____

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

Teacher 15 yrs. Teacher Asst. 8 yrs.

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment? Spouse is a computer programmer at National Computer Corp. in Greenville

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | | |
|---|--------------------------------------|-------------------------------------|
| (a) Hearing problems | Yes | ☒ No |
| (b) Seeing problems, even with glasses | Yes | ☒ No |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes | ☒ No |
| (d) Regular doctor appointments | Yes | ☒ No |
| (e) Young children to care for | Yes | ☒ No |
| (f) Medical condition affecting attention | Yes | ☒ No |
| (g) Difficulty sitting for long periods of time | ☒ Yes | No |

If you answered YES to any of these questions, please explain: arthritis, pain in back and legs when sitting for long periods

2. Are you taking medications regularly? Yes ☒ No ☐

If yes, please list the medications:

Over-the-counter only - for back and leg pain
Aspirin, Aleve, Tylenol.

Do any of your medications affect your memory or concentration? Yes ☐ No ☒

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes ☐ No ☒

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

No

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____

No ✓

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 22 1/2 yrs.

2. Other places you have lived and length of time:

Elberton, GA - Almost 40 yrs (39 1/2)

3. How long have you lived at your current residence? 10 yrs.

4. Do you own or rent your current residence? own

5. Who else lives at your residence?

Name

Relationship

Michael Bragg

Husband

Evan Fields

Grandson

6. For each of your children (including foster or step-children), please give the following information:

<u>Sex</u>	<u>Age</u>	<u>Occupation/Grade in School/Name of School</u>	<u>Lives at Home</u>
<u>F</u>	<u>4</u>	<u>Homemaker.</u>	<u>at her home</u>
<u>M</u>	<u>36</u>	<u>Granite etcher</u>	<u>at his home</u>

7. Please give the occupation of the spouses of your married children:

Daughter's spouse - computer technician
Son's spouse - student and homemaker

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student.

Relationship

Age

Occupational Status

Grandson 21

student - unemployed

If the person(s) described in No. 8 above is employed, please state for each person:

Name of Individual and Location of Job

Title and Duties

Previous Jobs

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

movies, books, computer research

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

Anderson Indep. Newspaper, Bottomline Magazine, AARP Magazine

11. Do you frequently follow news reports concerning current events?

Yes ☒ No ☐ If yes, please describe your primary sources of information.

Newspaper, television, internet

12. What television and radio programs do you frequently watch or listen to?

History channel, National Geographic, T.V. movies, Christian radio, Fox News, CNN, CNBC

13. How often do you watch Court TV or other "true" courtroom show on TV?

Almost never

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☒ No ☐

If so, please explain:

Anything that is in opposition to my Christian beliefs, ethics, values

15. What type of books do you read:

The Bible, Christian non-fiction, Romantic mysteries, some lawer fiction (John Grisham)

16. What is the last book you read?

Dead Heat by Joel Rosenberg

No

17. Do you ever read "true crime books"? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

Yes - Scott and Lacy Peterson case caught my interest. Followed it closely.

19. Have you ever watched all or most of a trial from start to finish? Yes ☒ No ☐ (The above trial of Scott Peterson o. T.V.)

20. Is there any trial that you followed where you disagreed with the verdict?

Yes ☐ No ☒ Explain:

21. Do you use or have access to the Internet? Yes ☒ No ☐

22. If yes, how much time do you spend on the Internet? 1 to 2 hours per day

23. For what purpose? Facebook, news, and research

24. What type of Internet sites or blogs do you frequent?

News, medical for information, research different sites & interest (NASA, Space Expl, Bible Prophecy, Geograph)

25. Will you accept without reservation, the Court's order that YOU WILL NOT ACCESS OR USE

THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING

THIS TRIAL?

Yes ☒ No ☐

26. Would you also follow, without reservation, the Court's order that YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?

Yes ☒ No ☐

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes ✓ No
28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?** Yes ✓ No
29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?** Yes ✓ No

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? College
2. Please list the schools you have attended and approximate dates you attended each school:
3. Grade School: Falling Creek Elem. ^{Doves Creek} Dates: 1954-1960
4. Junior High School: _____ Dates: _____
5. High School: Elbert Co. High Sch. Dates: 1961-66
6. College: Emmanuel Jr. College - Univ. of GA Dates: 1972-1976
7. Vocational or Trade School: _____ Dates: _____
8. Professional School: _____ Dates: _____
9. Graduate School: Clemson (one semester) Dates: 1991
10. If you are a student, please describe your area of study: _____
11. If you attended college, vocational or technical school, or graduate school, please list:
12. Your major subject or field of study: Education
13. Any degrees or diplomas which you hold: B.S. in Educ.

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes ☒ No ☐
2. What is your religious affiliation, if any? Christian - Bapt.
3. What is/was your parents' religious affiliation, if any? Christian - Bapt.
4. Have you ever changed your religious affiliation? Yes ☐ No ☒
5. If yes, what was your previous affiliation, and why did you change?

6. Do you attend any religious services? Yes ☒ No ☐
7. If yes, how often do you attend? 3 times per week
8. Are you involved with religious activities? Yes ☒ No ☐
9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

Are you an active member in any of these groups? Yes ☐ No ☒

10. If yes, please explain your activities with each group:

11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes ☐ No ☒

If yes, are you an active member? Yes ☐ No ☐

If yes, please list the organizations and explain your activities:

"Qualified" (# 3324)

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

1. Full Name: Stephen Neal Brittain

Age: 53 Date of Birth: [REDACTED]

2. Any other names you have used: _____

Address: [REDACTED]

3. How long have you lived at your present address? 18

4. Marital Status (please check)

Single ☒

Married _____ Years _____

Separated _____

Divorced _____ Years _____

Widowed _____

Never Married _____

Living with someone as a couple _____ Divorced and Remarried _____ years

5. If living with someone as a couple, please state your partner's name: _____

6. Are you a citizen of the United States? Yes ☒ No _____

7. Racial or ethnic group: Caucasian

A TRUE COPY

MAR 12 2012

P. A. Huley
CLERK OF COURT

EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed
Employed full-time
 Employed part-time
 Working in the home

Unemployed/laid-off
 Retired/student
 Disabled/unable to work

2. Name of current employer:

General Machine of Anderson

3. What is your present occupation, title or profession?

Shop supervisor

4. Have you held any previous positions with the same employer?

N/A

5. Number of years employed as above: 4

6. Are you the primary wage earner for your family? Yes: ☒ No: ☐

7. Are you salaried or hourly employee? salaried: ☒ hourly: ☐

8. Do you rely on overtime pay to meet your monthly household expenses?
 Yes: ☐ No: ☒

9. Do you supervise other employees? Yes ☒ No ☐

10. If YES, how many employees do you supervise? 15

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace? 25

12. Do you have a "second" job? YES ☐ NO ☒

13. If YES, what is it and where are you employed? _____

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

N/A

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment? N/A

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | | |
|---|-----|-----------|
| (a) Hearing problems | Yes | <u>No</u> |
| (b) Seeing problems, even with glasses | Yes | <u>No</u> |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes | <u>No</u> |
| (d) Regular doctor appointments | Yes | <u>No</u> |
| (e) Young children to care for | Yes | <u>No</u> |
| (f) Medical condition affecting attention | Yes | <u>No</u> |
| (g) Difficulty sitting for long periods of time | Yes | <u>No</u> |

If you answered YES to any of these questions, please explain: _____

2. Are you taking medications regularly? Yes _____ No ✓

If yes, please list the medications:

Do any of your medications affect your memory or concentration? Yes _____ No ✓

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes _____ No ✓

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

N/A

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____

No ☒

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 25

2. Other places you have lived and length of time:

Pennsylvania - 27

3. How long have you lived at your current residence? 18

4. Do you own or rent your current residence? Own

5. Who else lives at your residence?

Name

Relationship

N/A

6. For each of your children (including foster or step-children), please give the following information:

<u>Sex</u>	<u>Age</u>	<u>Occupation/Grade in School/Name of School</u>	<u>Lives at Home</u>
<u>F</u>	<u>26</u>	<u>sec. / 12 / T.L. Hanna</u>	<u>No</u>
<u>M</u>	<u>25</u>	<u>maintenance / 12 / TL Hanna</u>	<u>No</u>
<u>F</u>	<u>24</u>	<u>unemployed / 12 / T.L. Hanna</u>	<u>No</u>

7. Please give the occupation of the spouses of your married children:

N/A

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student.

Relationship

Age

Occupational Status

If the person(s) described in No. 8 above is employed, please state for each person:

Name of Individual and Location of Job

Title and Duties

Previous Jobs

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

Drag racing, books, yard work, and volunteering for the Hot Air Balloons.

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

Popular science and NHRA Drag racing

11. Do you frequently follow news reports concerning current events?

Yes ☐ No ☒ If yes, please describe your primary sources of information.

12. What television and radio programs do you frequently watch or listen to?

History, discovery, weather, and ESPN

13. How often do you watch Court TV or other "true" courtroom show on TV?

Never

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☐ No ☒

If so, please explain:

15. What type of books do you read:

Fiction

16. What is the last book you read? The Da Vinci Code

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

N/A

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

No

19. Have you ever watched all or most of a trial from start to finish? Yes No ☒

20. Is there any trial that you followed where you disagreed with the verdict?

Yes No ☒ Explain:

21. Do you use or have access to the Internet? Yes ☒ No

22. If yes, how much time do you spend on the Internet? 2-3

23. For what purpose? Work

24. What type of Internet sites or blogs do you frequent?

Bing ; Google

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes ☒ No

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes ☒ No

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes ☒ No ☐
28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?** Yes ☒ No ☐
29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?** Yes ☒ No ☐

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? 12 years
2. Please list the schools you have attended and approximate dates you attended each school:
3. Grade School: Irvine Elementary Dates: 1962-68
4. Junior High School: N/A Dates:
5. High School: Youngsville High School Dates: 1968-74
6. College: Dates:
7. Vocational or Trade School: Warren County Vo-tech Dates: 1971-74
8. Professional School: Dates:
9. Graduate School: Dates:
10. If you are a student, please describe your area of study: N/A
11. If you attended college, vocational or technical school, or graduate school, please list:
12. Your major subject or field of study: Graphic Arts
13. Any degrees or diplomas which you hold: N/A

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply)

Law	Law Enforcement	Psychiatry
Criminal Justice	Criminology	
Sociology	Psychology	
Social Work/Counseling	Forensic Sciences (e.g. serology, fingerprinting, etc.)	
Medicine	Nursing	
Journalism	DNA	
Biology	Chemistry	

If you circled anything in Question 14, please describe:

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? N/A

16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: N/A

17. Have you ever served in the armed forces, or in the National Guard?

Yes ☒ No ☐

a. If yes, what branch? Army Active ☒ Reserve ☐

b. Highest Rank E-5 Dates of service: 1975-79

c. Duties: Scouts out / Recon

d. What medals, honors, or commendations did you receive, if any? DO NOT Remember

e. Did you attend any special schools or receive any special training? Yes ☒ No ☐ If Yes, please describe: NCO Training

f. Did you serve in combat? Yes ☐ No ☒

g. Were you drafted or did you voluntarily enlist? Drafted ☐ Enlisted ☒

h. Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes ☐ No ☒

i. If yes, please explain (i.e., a court martial or a board of inquiry):

16. If any members of your family served or are now serving in the armed forces, for each member please list the following:

<u>Relationship</u>	<u>Branch Rank Achieved</u>	<u>Duties</u>
<u>N/A</u>		

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes ☒ No ☐
2. What is your religious affiliation, if any? I believe in God
3. What is/was your parents' religious affiliation, if any? NIA
4. Have you ever changed your religious affiliation? Yes ☐ No ☒
5. If yes, what was your previous affiliation, and why did you change?

6. Do you attend any religious services? Yes ☐ No ☒
7. If yes, how often do you attend? _____
8. Are you involved with religious activities? Yes ☐ No ☒
9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

Haven A Rest

Are you an active member in any of these groups? Yes ☐ No ☒

10. If yes, please explain your activities with each group:

11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes ☐ No ☒

If yes, are you an active member? Yes ☐ No ☐

If yes, please list the organizations and explain your activities:

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes _____	No ☒
Mothers Against Drunk Driving	Yes _____	No ☒
Any pro-death penalty group	Yes _____	No ☒
Any anti-death penalty group	Yes _____	No ☒
Parents/Families of Murdered Children	Yes _____	No ☒
Any group that campaigns for stricter criminal penalties	Yes _____	No ☒
Any group that campaigns for more lenient criminal penalties	Yes _____	No ☒
Any group that advocates victims rights	Yes _____	No ☒
Any group that advocates for prisoners' rights	Yes _____	No ☒

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
-----------------------------------	----------------------	---------------------

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes _____
No ☒

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)?
Yes _____ No ☒ If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes (☒) No
(b) Your Spouse () Yes (☒) No

If yes, list office. Location and dated of service:

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes _____ No ☒

If yes, for each occasion, please state:

When Where Civil /Criminal/Court Martial Nature of Case

Did you deliberate? Yes _____ No _____

If yes, what kind of case? _____

Was there a verdict?

Were you the Foreperson? Yes _____ No _____

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes _____ No ☒

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis?

Yes _____ No ☒

If yes, please identify such person and describe his/her relationship to you:

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes _____ No ☒

If YES, please state the name of the person, their relationship to you, and their current occupation:

Have you ever hired a lawyer for any reason? Yes ☒ No _____

Please explain:

DIVORCE

Have you, a family member or close friend ever been:

- (a) accused of a crime (more serious than a speeding ticket) Yes _____ No ☒
- (b) arrested for a crime (more serious than a speeding ticket) Yes _____ No ☒
- (c) charged with a crime (more serious than a speeding ticket) Yes _____ No ☒
- (d) convicted of a crime (more serious than a speeding ticket) Yes _____ No ☒
- (e) investigated for a crime? (more serious than a speeding ticket) Yes _____ No ☒
- (f) the victim of a crime Yes _____ No ☒
- (g) a witness to a crime Yes _____ No ☒

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person:

N/A

If you have ever been the victim of a crime, please indicate the following information, if you know it:

Name of perpetrator: _____

Age of perpetrator at time of crime: _____ Your age at time of crime _____

Relationship of the perpetrator to you? _____

Please describe the nature of the offense and any injuries or loss you suffered:

Where were there any court proceedings? Yes ___ No ___ Did you attend? Yes ___ No ___

Did you testify? Yes: ___ No: ___

Do you feel you were treated fairly by the justice system?

Please explain:

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it:

What is the relationship of the victim to you? _____

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes _____ No _____

Was the perpetrator caught? Yes _____ No _____

Were there any court proceedings? Yes _____ No _____

Did you attend any of the court proceedings? Yes _____ No _____

Did you testify? Yes _____ No _____

Please describe the nature of the offense and any injuries or loss suffered?

When did you learn of the incident? _____

Do you feel the victim was treated fairly by the justice system?

Please explain. _____

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes _____ No _____

(a) If the witness was you, please answer the following questions

Describe the crime: _____

Did you report the crime to the police? ____ Yes ____ No

If not, why not? _____

Did you give a statement to the police? Yes ____ No ____

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes ____ No ____

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

(a) any city, county, federal or state prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes ____ No ☒

(b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes ____ No ☒

(c) any city, county, federal or state correctional institution or detention facility? Yes ____ No ☒

(d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes ____ No ☒

(e) any probation department or parole department? Yes ____ No ☒

(f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes ____ No ☒

(g) any other agency or organization connected with the criminal justice system (e.g. ACLU, Citizens for Law and Order, etc.)? Yes ____ No ☒

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

- ☐ the Anderson County Solicitor's Office
- ☐ members of any other district attorney's office
- ☐ members of any Capital Defender's office
- ☐ any criminal defense attorneys
- ☐ any judges, court commissioners, or referees
- ☐ any court personnel (i.e., court reporters, clerks, etc.)
- ☐ any other type of attorneys or paralegals
- ☐ any parole or probation officers
- ☐ any person connected with the criminal justice system in any capacity
- ☐ any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes ☐ No ☐

If yes, please explain.

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated].

Have you ever done any of the following:

- (a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes ☐ No ☒
- (b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes ☐ No ☒
- (c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes ☐ No ☒

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes ____ No ☒
If yes, please explain:

Have you ever known anyone who died as a result of violence? Yes ____ No ☒

If yes, please explain:

Have you ever been threatened or in fear for your life? Yes ____ No ☒

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes ____ No ☒

Do you, or any member of your family own one or more firearms? Yes ____ No ☒
If yes, please describe:

What is your opinion about counselors, therapists, psychologists, and psychiatrists?

To each his own

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way?

Never really thought about it; if it is meant to be then so be it, depending on the circumstances of the crime.

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

1. I believe that the death penalty is the appropriate form of punishment in all murder cases.
2. I believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.
5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way?

Depending on the circumstances

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

N/A

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes ___ No ✓

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often

About the right amount

Too seldom

Other I do not keep up with the status

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes _____

No ☒

Regardless of which box you checked, please explain your answer:

Depending on circumstances

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe

No, less severe

Just as severe

Please explain:

Death is the most severe punishment

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes _____ No ☒

If YES, please explain: _____

Do you hold to any religious, moral feelings or philosophical principles that would affect your ability to vote for the death penalty as a judgment in this case?

Yes _____

No ☒

Please explain: _____

Are you affiliated with any organization that advocates in favor of the death penalty?

Yes _____

No ☒

If yes, what organization? _____

Are you affiliated with any organization that advocates against the death penalty?

Yes _____

No ☒

If yes, what organization? _____

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

No not really

Is there any matter that has not been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning any other subject that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes No ✓ If yes, please explain:

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes

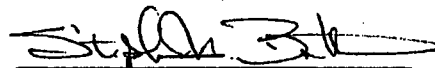
No ✓ Please explain _____

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: 2/2/10

33

Juror Number


Signature

#04

"Qualified"

3042

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

1. Full Name: Tina M Cotton

Age: 54 Date of Birth: [REDACTED]

2. Any other names you have used: _____

Address: [REDACTED]

3. How long have you lived at your present address? 7 yrs

4. Marital Status (please check)

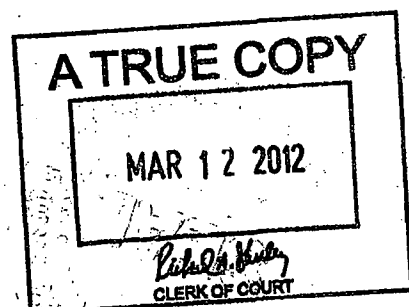
Single _____ Married ☒ Years _____
Separated _____ Divorced _____ Years _____
Widowed _____ Never Married _____
Living with someone as a couple _____ Divorced and Remarried _____ years

5. If living with someone as a couple, please state your partner's name: _____

6. Are you a citizen of the United States? Yes ☒ No _____

7. Racial or ethnic group: Hispanic

CLERK'S OFFICE
PERSON SC
2012 DEC 22 A 8:55
COMMON PLEAS AND
GENERAL SESSIONS



EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed
☒ Employed full-time
☐ Employed part-time
☐ Working in the home

Unemployed/laid-off
 Retired/student
 Disabled/unable to work

2. Name of current employer:

Dillard's

3. What is your present occupation, title or profession?

Sales

4. Have you held any previous positions with the same employer?

N/A

5. Number of years employed as above: 1 year

6. Are you the primary wage earner for your family? Yes: ☐ No: ☒

7. Are you salaried or hourly employee? salaried: ☐ hourly: ☒

8. Do you rely on overtime pay to meet your monthly household expenses?
 Yes: ☐ No: ☒

9. Do you supervise other employees? Yes ☐ No ☒

10. If YES, how many employees do you supervise? N/A

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace? 4

12. Do you have a "second" job? YES ☐ NO ☒

13. If YES, what is it and where are you employed? _____

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

N/A

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment? AnMed Health Sleep & Lung & Sleep Ctr

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | | |
|---|-----|-------------------------------------|
| (a) Hearing problems | Yes | ☒ No |
| (b) Seeing problems, even with glasses | Yes | ☒ No |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes | ☒ No |
| (d) Regular doctor appointments | Yes | ☒ No |
| (e) Young children to care for | Yes | ☒ No |
| (f) Medical condition affecting attention | Yes | ☒ No |
| (g) Difficulty sitting for long periods of time | Yes | ☒ No |

If you answered YES to any of these questions, please explain: _____

2. Are you taking medications regularly? Yes ☒ No ☐

If yes, please list the medications:

Monopril (high blood pressure) Celebrax (arthritis)

Do any of your medications affect your memory or concentration? Yes ☐ No ☒

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes ☐ No ☒

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

NO

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____
No ☒

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 8 yrs
 2. Other places you have lived and length of time:
Rogers, Arkansas
Dallas, TX
 3. How long have you lived at your current residence? 8 years
 4. Do you own or rent your current residence? _____
 5. Who else lives at your residence?

<u>Name</u>	<u>Relationship</u>
<u>Jeff Cotton</u>	<u>husband</u>
<u>Zachary Cotton</u>	<u>son</u>

6. For each of your children (including foster or step-children), please give the following information:

<u>Sex</u>	<u>Age</u>	<u>Occupation/Grade in School/Name of School</u>	<u>Lives at Home</u>
<u>M</u>	<u>18</u>	<u>12/Piedmont Christian</u>	☒
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

7. Please give the occupation of the spouses of your married children:
- _____
- _____
- _____

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student.

<u>Relationship</u>	<u>Age</u>	<u>Occupational Status</u>
_____	_____	_____
_____	_____	_____

If the person(s) described in No. 8 above is employed, please state for each person:

Name of Individual and Location of Job	Title and Duties	Previous Jobs

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

books, movies,

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

none

11. Do you frequently follow news reports concerning current events?

Yes ☒

No ☐

If yes, please describe your primary sources of information.

t.v. & internet

12. What television and radio programs do you frequently watch or listen to?

PBS, NPR

13. How often do you watch Court TV or other "true" courtroom show on TV?

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☐

No ☒

If so, please explain:

15. What type of books do you read:

Non Fictional, Fictional

16. What is the last book you read?

The Lost Symbol - Dan Brown

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

No

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

No

19. Have you ever watched all or most of a trial from start to finish? Yes ☐ No ☒

20. Is there any trial that you followed where you disagreed with the verdict?

Yes ☐ No ☐ Explain:

21. Do you use or have access to the Internet? Yes ☒ No ☐

22. If yes, how much time do you spend on the Internet? 1-2 hours per night

23. For what purpose? news

24. What type of Internet sites or blogs do you frequent?

NPR.org, PBS.org,

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes ☒ No ☐

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes ☒ No ☐

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes ☒ No ☐
28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?** Yes ☒ No ☐
29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?** Yes ☒ No ☐

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? 12
2. Please list the schools you have attended and approximate dates you attended each school:
3. Grade School: 1-7 Dates: _____
4. Junior High School: 8-9 Dates: _____
5. High School: 10-12 Dates: _____
6. College: _____ Dates: _____
7. Vocational or Trade School: _____ Dates: _____
8. Professional School: _____ Dates: _____
9. Graduate School: _____ Dates: _____
10. If you are a student, please describe your area of study: _____
11. If you attended college, vocational or technical school, or graduate school, please list:
12. Your major subject or field of study: _____
13. Any degrees or diplomas which you hold: _____

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply)

Law	Law Enforcement	Psychiatry
Criminal Justice	Criminology	
Sociology	Psychology	
Social Work/Counseling	Forensic Sciences (e.g. serology, fingerprinting, etc.)	
<u>Medicine</u>	Nursing	
Journalism	DNA	
Biology	Chemistry	

If you circled anything in Question 14, please describe:

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? 16 years

16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: registered polysomnographer

17. Have you ever served in the armed forces, or in the National Guard?

Yes ☐ No ☒

a. If yes, what branch? _____ Active ☐ Reserve ☐

b. Highest Rank _____ Dates of service: _____

c. Duties: _____

d. What medals, honors, or commendations did you receive, if any?

e. Did you attend any special schools or receive any special training? Yes ☐ No ☒ If Yes, please describe:

f. Did you serve in combat? Yes ☐ No ☒

g. Were you drafted or did you voluntarily enlist? Drafted ☐ Enlisted ☐

h. Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes ☐ No ☒

i. If yes, please explain (i.e., a court martial or a board of inquiry):

16. If any members of your family served or are now serving in the armed forces, for each member please list the following:

Relationship	Branch Rank Achieved	Duties
husband	E5	airframe mechanic
_____	_____	_____
_____	_____	_____

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes ☒ No ☐
2. What is your religious affiliation, if any? N/A
3. What is/was your parents' religious affiliation, if any? Catholic
4. Have you ever changed your religious affiliation? Yes ☒ No ☐
5. If yes, what was your previous affiliation, and why did you change?
Catholic to Lutheran

6. Do you attend any religious services? Yes ☐ No ☒
7. If yes, how often do you attend? _____
8. Are you involved with religious activities? Yes ☐ No ☒
9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

Are you an active member in any of these groups? Yes ☐ No ☒

10. If yes, please explain your activities with each group:

11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)? ☒

Yes ☐ No ☐

If yes, are you an active member? Yes ☐ No ☐

If yes, please list the organizations and explain your activities:

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes _____	No ☒
Mothers Against Drunk Driving	Yes _____	No ☒
Any pro-death penalty group	Yes _____	No ☒
Any anti-death penalty group	Yes _____	No ☒
Parents/Families of Murdered Children	Yes _____	No ☒
Any group that campaigns for stricter criminal penalties	Yes _____	No ☒
Any group that campaigns for more lenient criminal penalties	Yes _____	No ☒
Any group that advocates victims rights	Yes _____	No ☒
Any group that advocates for prisoners' rights	Yes _____	No ☒

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
-----------------------------------	----------------------	---------------------

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes _____
No ☒

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)?
Yes _____ No ☒ If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes (☒) No
(b) Your Spouse () Yes (☒) No

If yes, list office. Location and dated of service:

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes _____ No C

If yes, for each occasion, please state:

When Where Civil /Criminal/Court Martial Nature of Case

Did you deliberate? Yes _____ No 1

If yes, what kind of case? _____

Was there a verdict?

Were you the Foreperson? Yes _____ No _____

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes _____ No ✓

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis?
Yes _____ No ✓

If yes, please identify such person and describe his/her relationship to you:

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes _____ No ✓

If YES, please state the name of the person, their relationship to you, and their current occupation:

Have you ever hired a lawyer for any reason? Yes X No _____

Please explain:

Real estate & Wills

Have you, a family member or close friend ever been:

- | | | |
|---|-----|--|
| (a) accused of a crime (more serious than a speeding ticket) | Yes | No ☒ |
| (b) arrested for a crime (more serious than a speeding ticket) | Yes | No ☒ |
| (c) charged with a crime (more serious than a speeding ticket) | Yes | No ☒ |
| (d) convicted of a crime (more serious than a speeding ticket) | Yes | No ☒ |
| (e) investigated for a crime? (more serious than a speeding ticket) | Yes | No ☒ |
| (f) the victim of a crime | Yes | No ☒ |
| (g) a witness to a crime | Yes | No ☒ |

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person.

Evermy Cotton, my son, was arrested for shoplifting. He went to P.T.I.

If you have ever been the victim of a crime, please indicate the following information, if you know it:

Name of perpetrator: UNK

Age of perpetrator at time of crime: UNK Your age at time of crime 42

Relationship of the perpetrator to you? UNK

Please describe the nature of the offense and any injuries or loss you suffered:

Burglary of house, no one ever caught.

Were there any court proceedings? Yes ☒ No ☐ Did you attend? Yes ☐ No ☒

Did you testify? Yes: ☐ No: ☒

Do you feel you were treated fairly by the justice system?

Please explain:

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it: *N/A*

What is the relationship of the victim to you? _____

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes ☐ No ☐

Was the perpetrator caught? Yes ☐ No ☐

Were there any court proceedings? Yes ☐ No ☐

Did you attend any of the court proceedings? Yes ☐ No ☐

Did you testify? Yes ☐ No ☐

Please describe the nature of the offense and any injuries or loss suffered?

When did you learn of the incident? _____

Do you feel the victim was treated fairly by the justice system?

Please explain. _____

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes _____ No ✓

(a) If the witness was you, please answer the following questions

Describe the crime: _____

Did you report the crime to the police? _____ Yes _____ No

If not, why not? _____

Did you give a statement to the police? Yes _____ No _____

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes _____ No _____

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

(a) any city, county, federal or state ✓ prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes _____ No _____

(b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes _____ No ✓

(c) any city, county, federal or state correctional institution or detention facility? Yes _____ No ✓

(d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes _____ No ✓

(e) any probation department or parole department? Yes _____ No ✓

(f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes _____ No ✓

(g) any other agency or organization connected with the criminal justice system (e.g. ACLU, Citizens for Law and Order, etc.)? Yes _____ No ✓

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

- ☐ the Anderson County Solicitor's Office
- ☐ members of any other district attorney's office
- ☐ members of any Capital Defender's office
- ☐ any criminal defense attorneys
- ☐ any judges, court commissioners, or referees
- ☐ any court personnel (i.e., court reporters, clerks, etc.)
- ☐ any other type of attorneys or paralegals
- ☐ any parole or probation officers
- ☐ any person connected with the criminal justice system in any capacity
- ☐ any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes ☐ No ☒

If yes, please explain.

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated]

Visited Son in Court

Have you ever done any of the following:

(a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes ☒ No ☐

(b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes ☐ No ☒

(c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes ☐ No ☒

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes ☐ No ☒
If yes, please explain:

Have you ever known anyone who died as a result of violence? Yes ☐ No ☒

If yes, please explain:

Have you ever been threatened or in fear for your life? Yes ☐ No ☒

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes ☐ No ☒

Do you, or any member of your family own one or more firearms? Yes ☒ No ☐

If yes, please describe:

22 semi auto, 9mm semi auto, 45 semi auto, 38; (4) 357 mag

What is your opinion about counselors, therapists, psychologists, and psychiatrists?

I believe all four professions serve the community well.

357 carbine,
44 mag carb
20 ga shotgun

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way?

*It doesn't prevent crime but is
Politically necessary.*

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

1. I believe that the death penalty is the appropriate form of punishment in all murder cases.

2. I believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.

3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.

4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.

5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way?

*Is cheaper than death penalty but good
it can be commuted if overturned*

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

Same as above

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes ___ No ✓

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often

About the right amount

Too seldom

Other _____

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes ~~____~~

No ____

Regardless of which box you checked, please explain your answer:

It's not too severe

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe

No, less severe

Just as severe

Please explain:

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes _____ No ____

If YES, please explain: _____

Do you hold to any religious, moral feelings or philosophical principles that would affect your ability to vote for the death penalty as a judgment in this case?

Yes _____ No ✓ Please explain: _____

Are you affiliated with any organization that advocates in favor of the death penalty?

Yes _____ No ✓

If yes, what organization? _____

Are you affiliated with any organization that advocates against the death penalty?

Yes _____ No ✓

If yes, what organization? _____

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

NO

Is there any matter that has not been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning any other subject that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes ___ No X If yes, please explain:

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes ___

No X Please explain _____

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: 12/17/09

Gina M. Ota
Signature

Juror Number _____

#80

"Qualified" 3060

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

1. Full Name: ANNE E DONALD

Age: 56

Date of Birth: [REDACTED]

2. Any other names you have used: [REDACTED]

Address: [REDACTED]

3. How long have you lived at your present address? 10 years

4. Marital Status (please check)

Single ☒

Married _____ Years _____

Separated _____

Divorced _____ Years _____

Widowed _____

Never Married _____

Living with someone as a couple _____ Divorced and Remarried _____ years

5. If living with someone as a couple, please state your partner's name: NORMAN WILLFORD a friend

6. Are you a citizen of the United States? Yes ☒ No _____

7. Racial or ethnic group: _____

A TRUE COPY

MAR 12 2012

Richard A. Harty
CLERK OF COURT

EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed
☒ Employed full-time
 Employed part-time
 Working in the home

Unemployed/laid-off
 Retired/student
 Disabled/unable to work

2. Name of current employer:

NHC

3. What is your present occupation, title or profession?

Homes Keeper

4. Have you held any previous positions with the same employer?

yes

5. Number of years employed as above:
- 11 years

6. Are you the primary wage earner for your family? Yes: ___ No:
- ☒

7. Are you salaried or hourly employee? salaried: ___ hourly:
- ☒

8. Do you rely on overtime pay to meet your monthly household expenses?
-
- Yes: ___ No:
- ☒

9. Do you supervise other employees? Yes ___ No
- ☒

10. If YES, how many employees do you supervise? _____

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace? _____

12. Do you have a "second" job? YES
- ☒
- NO

13. If YES, what is it and where are you employed? _____

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment? _____

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | | |
|---|-----|-------------------------------------|
| (a) Hearing problems | Yes | ☒ No |
| (b) Seeing problems, even with glasses | Yes | ☒ No |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes | ☒ No |
| (d) Regular doctor appointments | Yes | ☒ No |
| (e) Young children to care for | Yes | ☒ No |
| (f) Medical condition affecting attention | Yes | ☒ No |
| (g) Difficulty sitting for long periods of time | Yes | ☒ No |

If you answered YES to any of these questions, please explain: _____

2. Are you taking medications regularly? Yes _____ No ☒

If yes, please list the medications:

Do any of your medications affect your memory or concentration? Yes _____ No ☒

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes _____ No ☒

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____
 No ☒

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? all my life
 2. Other places you have lived and length of time:

3. How long have you lived at your current residence? 10 years
 4. Do you own or rent your current residence? Rent
 5. Who else lives at your residence?

<u>Name</u>	<u>Relationship</u>
<u>NORMAN WILLIFORD</u>	<u>Friend</u>

6. For each of your children (including foster or step-children), please give the following information:

<u>Sex</u>	<u>Age</u>	<u>Occupation/Grade in School/Name of School</u>	<u>Lives at Home</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

7. Please give the occupation of the spouses of your married children:

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student.

<u>Relationship</u>	<u>Age</u>	<u>Occupational Status</u>
_____	_____	_____
_____	_____	_____

If the person(s) described in No. 8 above is employed, please state for each person:

<u>Name of Individual and Location of Job</u>	<u>Title and Duties</u>	<u>Previous Jobs</u>

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

books

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

11. Do you frequently follow news reports concerning current events?

Yes ☐ No ☒ If yes, please describe your primary sources of information.

12. What television and radio programs do you frequently watch or listen to?

The News

13. How often do you watch Court TV or other "true" courtroom show on TV?

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☐ No ☐

If so, please explain:

15. What type of books do you read:

Magazines

16. What is the last book you read? Home-life magazines

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

NO

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

NO

19. Have you ever watched all or most of a trial from start to finish? Yes _____ No ☒

20. Is there any trial that you followed where you disagreed with the verdict?

Yes _____ No ☒ Explain:

21. Do you use or have access to the Internet? Yes _____ No ☒

22. If yes, how much time do you spend on the Internet? _____

23. For what purpose? _____

24. What type of Internet sites or blogs do you frequent?

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes ☒ No _____

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes ☒ No _____

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes ✓ No
28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?** Yes ✓ No
29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?** Yes ✓ No

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? 12th
2. Please list the schools you have attended and approximate dates you attended each school:
3. Grade School: _____ Dates: _____
4. Junior High School: _____ Dates: _____
5. High School: New Deal _____ Dates: _____
6. College: _____ Dates: _____
7. Vocational or Trade School: _____ Dates: _____
8. Professional School: _____ Dates: _____
9. Graduate School: _____ Dates: _____
10. If you are a student, please describe your area of study: _____
11. If you attended college, vocational or technical school, or graduate school, please list:
12. Your major subject or field of study: _____
13. Any degrees or diplomas which you hold: _____

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply)

Law	Law Enforcement	Psychiatry
Criminal Justice	Criminology	
Sociology	Psychology	
Social Work/Counseling	Forensic Sciences (e.g. serology, fingerprinting, etc.)	
Medicine	Nursing	
Journalism	DNA	
Biology	Chemistry	

If you circled anything in Question 14, please describe:

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? _____

16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: _____

17. Have you ever served in the armed forces, or in the National Guard?

Yes _____ No ☒

a. If yes, what branch? _____ Active _____ Reserve _____

b. Highest Rank _____ Dates of service: _____

c. Duties: _____

d. What medals, honors, or commendations did you receive, if any?

e. Did you attend any special schools or receive any special training? Yes _____ No ☒ If Yes, please describe:

f. Did you serve in combat? Yes _____ No ☒

g. Were you drafted or did you voluntarily enlist? Drafted _____ Enlisted _____

h. Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes _____ No ☒

i. If yes, please explain (i.e., a court martial or a board of inquiry):

16. If any members of your family served or are now serving in the armed forces, for each member please list the following:

<u>Relationship</u>	<u>Branch Rank Achieved</u>	<u>Duties</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes ☒ No ☐
2. What is your religious affiliation, if any? _____
3. What is/was your parents' religious affiliation, if any? _____
4. Have you ever changed your religious affiliation? Yes _____ No ☒
5. If yes, what was your previous affiliation, and why did you change?

6. Do you attend any religious services? Yes _____ No ☒
7. If yes, how often do you attend? _____
8. Are you involved with religious activities? Yes _____ No ☒
9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

Are you an active member in any of these groups? Yes _____ No ☒

10. If yes, please explain your activities with each group:

11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes _____ No ☒

If yes, are you an active member? Yes _____ No ☒

If yes, please list the organizations and explain your activities:

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes _____	No ☒
Mothers Against Drunk Driving	Yes _____	No ☒
Any pro-death penalty group	Yes _____	No ☒
Any anti-death penalty group	Yes _____	No ☒
Parents/Families of Murdered Children	Yes _____	No ☒
Any group that campaigns for stricter criminal penalties	Yes _____	No ☒
Any group that campaigns for more lenient criminal penalties	Yes _____	No ☒
Any group that advocates victims rights	Yes _____	No ☒
Any group that advocates for prisoners' rights	Yes _____	No ☒

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
-----------------------------------	----------------------	---------------------

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes _____
No ☒

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)?
Yes _____ No ☒ If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes (☒) No
(b) Your Spouse () Yes () No

If yes, list office. Location and dated of service:

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes _____ No ☒

If yes, for each occasion, please state:

<u>When</u>	<u>Where</u>	<u>Civil/Criminal/Court Martial</u>	<u>Nature of Case</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Did you deliberate? Yes _____ No ☒

If yes, what kind of case? _____

Was there a verdict?

Were you the Foreperson? Yes _____ No ☒

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes _____ No ☒

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis?

Yes _____ No ☒

If yes, please identify such person and describe his/her relationship to you:

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes _____ No ☒

If YES, please state the name of the person, their relationship to you, and their current occupation:

Have you ever hired a lawyer for any reason? Yes _____ No ☒

Please explain:

Have you, a family member or close friend ever been:

- | | | |
|---|-----------|--|
| (a) accused of a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (b) arrested for a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (c) charged with a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (d) convicted of a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (e) investigated for a crime? (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (f) the victim of a crime | Yes _____ | No ☒ |
| (g) a witness to a crime | Yes _____ | No ☒ |

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person:

If you have ever been the victim of a crime, please indicate the following information, if you know it:

Name of perpetrator: _____

Age of perpetrator at time of crime: _____ Your age at time of crime _____

Relationship of the perpetrator to you? _____

Please describe the nature of the offense and any injuries or loss you suffered:

Where there any court proceedings? Yes _____ No _____ Did you attend? Yes _____ No _____

Did you testify? Yes: _____ No: _____

Do you feel you were treated fairly by the justice system?

Please explain:

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it:

What is the relationship of the victim to you? _____

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes _____ No _____

Was the perpetrator caught? Yes _____ No _____

Were there any court proceedings? Yes _____ No _____

Did you attend any of the court proceedings? Yes _____ No _____

Did you testify? Yes _____ No _____

Please describe the nature of the offense and any injuries or loss suffered?

When did you learn of the incident? _____

Do you feel the victim was treated fairly by the justice system?

Please explain. _____

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes _____ No ☒

(a) If the witness was you, please answer the following questions

Describe the crime: _____

Did you report the crime to the police? Yes _____ No _____

If not, why not? _____

Did you give a statement to the police? Yes _____ No _____

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes _____ No _____

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

(a) any city, county, federal or state prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes _____ No _____

(b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes _____ No _____

(c) any city, county, federal or state correctional institution or detention facility? Yes _____ No _____

(d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes _____ No _____

(e) any probation department or parole department? Yes _____ No _____

(f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes _____ No _____

(g) any other agency or organization connected with the criminal justice system (e.g. ACLU, Citizens for Law and Order, etc.)? Yes _____ No _____

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

- _____ the Anderson County Solicitor's Office
- _____ members of any other district attorney's office
- _____ members of any Capital Defender's office
- _____ any criminal defense attorneys
- _____ any judges, court commissioners, or referees
- _____ any court personnel (i.e., court reporters, clerks, etc.)
- _____ any other type of attorneys or paralegals
- _____ any parole or probation officers
- _____ any person connected with the criminal justice system in any capacity
- _____ any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes _____ No ☒

If yes, please explain. _____

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated].

Have you ever done any of the following:

- (a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes _____ No ☒
- (b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes _____ No ☒
- (c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes _____ No ☒

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes ____ No ☒
If yes, please explain:

Have you ever known anyone who died as a result of violence? Yes ____ No ☒

If yes, please explain:

Have you ever been threatened or in fear for your life? Yes ____ No ☒

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes ____ No ☒

Do you, or any member of your family own one or more firearms? Yes ____ No ☒
If yes, please describe:

What is your opinion about counselors, therapists, psychologists, and psychiatrists?

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way?

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

1. I believe that the death penalty is the appropriate form of punishment in all murder cases.
2. I believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.
5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way?

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes ☐ No ☒

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often

About the right amount

Too seldom

Other _____

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes ☒

No _____

Regardless of which box you checked, please explain your answer:

But some people are imprisoned for crimes that they don't commit.

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe

No, less severe

Just as severe

Please explain:

Same as above

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes _____ No ☒

If YES, please explain: _____

Do you hold to any religious, moral feelings or philosophical principles that would affect your ability to vote for the death penalty as a judgment in this case?

Yes ☒ No _____

Please explain:

But I just don't believe in it.

Are you affiliated with any organization that advocates in favor of the death penalty?

Yes _____ No ☒

If yes, what organization? _____

Are you affiliated with any organization that advocates against the death penalty?

Yes _____ No ☒

If yes, what organization? _____

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

Is there any matter that **has not** been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning **any other subject** that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes ☐ No ☒ If yes, please explain:

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes ☐

No ☒ Please explain ☐

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: 12-19-09

86
Juror Number

Anne E. Donald
Signature

("Qualified") (#104) 3078

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

1. Full Name: Sharrin Marie Fowler

Age: 40 Date of Birth: [REDACTED]

2. Any other names you have used: JA

Address: [REDACTED]

3. How long have you lived at your present address? 6 months

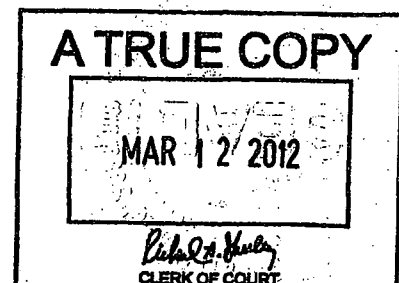
4. Marital Status (please check)

Single Married X Years
Separated Divorced Years
Widowed Never Married
Living with someone as a couple Divorced and Remarried years

5. If living with someone as a couple, please state your partner's name:

6. Are you a citizen of the United States? Yes X No

7. Racial or ethnic group: White



EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed
 Employed full-time
Employed part-time
 Working in the home

Unemployed/laid-off
 Retired/student
 Disabled/unable to work

2. Name of current employer:

Richard M. Campbell VNH.

3. What is your present occupation, title or profession?

LPN

4. Have you held any previous positions with the same employer?

NO

5. Number of years employed as above: 0

6. Are you the primary wage earner for your family? Yes: ___ No: ___

7. Are you salaried or hourly employee? salaried: ___ hourly: X

8. Do you rely on overtime pay to meet your monthly household expenses?
 Yes: ___ No: X

9. Do you supervise other employees? Yes X No: ___

10. If YES, how many employees do you supervise? Varies

If YES, do you have occasion to fire or discipline other employees? Please explain: NO

11. Approximately how many people are there at your workplace? unknown

12. Do you have a "second" job? YES (NO)

13. If YES, what is it and where are you employed? _____

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

HMR - Brookside Living Ctr. → LPN

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment? unemployed

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | | |
|---|-----|-----------|
| (a) Hearing problems | Yes | <u>No</u> |
| (b) Seeing problems, even with glasses | Yes | <u>No</u> |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes | <u>No</u> |
| (d) Regular doctor appointments | Yes | <u>No</u> |
| (e) Young children to care for | Yes | <u>No</u> |
| (f) Medical condition affecting attention | Yes | <u>No</u> |
| (g) Difficulty sitting for long periods of time | Yes | <u>No</u> |

If you answered YES to any of these questions, please explain: _____

2. Are you taking medications regularly? Yes X No _____

If yes, please list the medications:

Protonix, Claritin, Effexor

Do any of your medications affect your memory or concentration? Yes _____ No X

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes _____ No X

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____

No X

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 6 months

2. Other places you have lived and length of time:

Ballston Spa, NY → 3 yrs.

Edison, NJ - born + raised

3. How long have you lived at your current residence? 6 months

4. Do you own or rent your current residence? OWN

5. Who else lives at your residence?

Name

Relationship

Randy Fowler

Spouse

6. For each of your children (including foster or step-children), please give the following information:

<u>Sex</u>	<u>Age</u>	<u>Occupation/Grade in School/Name of School</u>	<u>Lives at Home</u>
<u>M</u>	<u>20</u>	<u>NA / 2nd Semester / TCT</u>	<u>yes</u>
<u>F</u>	<u>12</u>	<u>NA / 6th / Lakeside M.S.</u>	<u>yes</u>
<u>M</u>	<u>10</u>	<u>NA / 5th / Whitcomb Elem.</u>	<u>yes</u>

7. Please give the occupation of the spouses of your married children:

NA

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student.

Relationship

Age

Occupational Status

NA

If the person(s) described in No. 8 above is employed, please state for each person:

Name of Individual and Location of Job	Title and Duties	Previous Jobs
NA		

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

sleep/relax

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

none

11. Do you frequently follow news reports concerning current events?

Yes ☐ No ☒ If yes, please describe your primary sources of information.

12. What television and radio programs do you frequently watch or listen to?

HBO, A+E, Cartoon Network

13. How often do you watch Court TV or other "true" courtroom show on TV?

not often

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☐ No ☒

If so, please explain:

15. What type of books do you read:

romance

16. What is the last book you read? The long road home

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

No

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

No

19. Have you ever watched all or most of a trial from start to finish? Yes No X

20. Is there any trial that you followed where you disagreed with the verdict?

Yes No X Explain:

21. Do you use or have access to the Internet? Yes X No

22. If yes, how much time do you spend on the Internet? not sure

23. For what purpose? pleasure

24. What type of Internet sites or blogs do you frequent?

Face book + pay bills

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes X No

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes X No

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes X No _____
28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?** Yes X No _____
29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?** Yes X No _____

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? some college
2. Please list the schools you have attended and approximate dates you attended each school:
3. Grade School: St. Paul's N.J. Dates: 1983
4. Junior High School: NA Dates: _____
5. High School: P.V.T. N.J. Dates: 1987
6. College: TCT SC. Dates: 2005
7. Vocational or Trade School: BOCES NY Dates: 2008
8. Professional School: NA Dates: _____
9. Graduate School: NA Dates: _____
10. If you are a student, please describe your area of study: _____
11. If you attended college, vocational or technical school, or graduate school, please list:
12. Your major subject or field of study: Nursing
13. Any degrees or diplomas which you hold: LPN- Nursing

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply)

Law	Law Enforcement	Psychiatry
Criminal Justice	Criminology	
Sociology	<u>Psychology</u>	
Social Work/Counseling	Forensic Sciences (e.g. serology, fingerprinting, etc.)	
<u>Medicine</u>	<u>Nursing</u>	
Journalism	DNA	
<u>Biology</u>	Chemistry	

If you circled anything in Question 14, please describe:

I am a nurse

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? 12th grade - GED

16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: NA

17. Have you ever served in the armed forces, or in the National Guard?

Yes ___ No X

a. If yes, what branch? _____ Active ___ Reserve ___

b. Highest Rank _____ Dates of service: _____

c. Duties: _____

d. What medals, honors, or commendations did you receive, if any?

e. Did you attend any special schools or receive any special training? Yes ___ No ___ If Yes, please describe:

f. Did you serve in combat? Yes ___ No ___

g. Were you drafted or did you voluntarily enlist? Drafted ___ Enlisted ___

h. Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes ___ No ___

i. If yes, please explain (i.e., a court martial or a board of inquiry):

16. If any members of your family served or are now serving in the armed forces, for each member please list the following:

<u>Relationship</u>	<u>Branch Rank Achieved</u>	<u>Duties</u>
---------------------	-----------------------------	---------------

<u>NA</u>		

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes X No _____
2. What is your religious affiliation, if any? Catholic
3. What is/was your parents' religious affiliation, if any? Catholic
4. Have you ever changed your religious affiliation? Yes _____ No X
5. If yes, what was your previous affiliation, and why did you change?

6. Do you attend any religious services? Yes _____ No X not regularly
7. If yes, how often do you attend? X
8. Are you involved with religious activities? Yes _____ No X
9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:
NA

Are you an active member in any of these groups? Yes _____ No X

10. If yes, please explain your activities with each group:

11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes _____ No X

If yes, are you an active member? Yes _____ No _____

If yes, please list the organizations and explain your activities:

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes _____	No <u> </u>
Mothers Against Drunk Driving	Yes _____	No <u> </u>
Any pro-death penalty group	Yes _____	No <u> </u>
Any anti-death penalty group	Yes _____	No <u> </u>
Parents/Families of Murdered Children	Yes _____	No <u> </u>
Any group that campaigns for stricter criminal penalties	Yes _____	No <u> </u>
Any group that campaigns for more lenient criminal penalties	Yes _____	No <u> </u>
Any group that advocates victims rights	Yes _____	No <u> </u>
Any group that advocates for prisoners' rights	Yes _____	No <u> X </u>

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
<u>NA</u>		

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes _____
No X

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)?
Yes _____ No X If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes (X) No
(b) Your Spouse () Yes (X) No

If yes, list office. Location and dated of service:

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes _____ No X

If yes, for each occasion, please state:

When Where Civil /Criminal/Court Martial Nature of Case

Did you deliberate? Yes _____ No _____

If yes, what kind of case? _____

Was there a verdict?

Were you the Foreperson? Yes _____ No _____

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes _____ No X

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis?

Yes _____ No X

If yes, please identify such person and describe his/her relationship to you:

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes _____ No X

If YES, please state the name of the person, their relationship to you, and their current occupation:

Have you ever hired a lawyer for any reason? Yes X No _____

Please explain:

~~Bankruptcy~~ ~~Bankruptcy~~ ~~Bankruptcy~~
~~Bankruptcy~~ ~~Bankruptcy~~
 Bankruptcy

Sorry -
misread?

Have you, a family member or close friend ever been:

- | | | |
|---|-----|----|
| (a) accused of a crime (more serious than a speeding ticket) | Yes | No |
| (b) arrested for a crime (more serious than a speeding ticket) | Yes | No |
| (c) charged with a crime (more serious than a speeding ticket) | Yes | No |
| (d) convicted of a crime (more serious than a speeding ticket) | Yes | No |
| (e) investigated for a crime? (more serious than a speeding ticket) | Yes | No |
| (f) the victim of a crime | Yes | No |
| (g) a witness to a crime | Yes | No |

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person:

NA

If you have ever been the victim of a crime, please indicate the following information, if you know it:

Name of perpetrator: _____

Age of perpetrator at time of crime: _____ Your age at time of crime _____

Relationship of the perpetrator to you? _____

Please describe the nature of the offense and any injuries or loss you suffered:

Where there any court proceedings? Yes ☒ No _____ Did you attend? Yes ☒ No _____

Did you testify? Yes: ☒ No: _____

Do you feel you were treated fairly by the justice system? yes

Please explain:

granted bankruptcy

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it:

What is the relationship of the victim to you? NA

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes _____ No _____

Was the perpetrator caught? Yes _____ No _____

Were there any court proceedings? Yes _____ No _____

Did you attend any of the court proceedings? Yes _____ No _____

Did you testify? Yes _____ No _____

Please describe the nature of the offense and any injuries or loss suffered?

When did you learn of the incident? _____

Do you feel the victim was treated fairly by the justice system?

Please explain. _____

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes _____ No X

(a) If the witness was you, please answer the following questions

Describe the crime: _____

Did you report the crime to the police? ____ Yes ____ No

If not, why not? _____

Did you give a statement to the police? Yes ____ No ____

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes ____ No ____

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

- (a) any city, county, federal or state prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes ____ No X
- (b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes ____ No X
- (c) any city, county, federal or state correctional institution or detention facility? Yes ____ No X
- (d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes ____ No X
- (e) any probation department or parole department? Yes ____ No X
- (f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes ____ No X
- (g) any other agency or organization connected with the criminal justice system (e.g. ACLU, Citizens for Law and Order, etc.)? Yes ____ No X

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

NO the Anderson County Solicitor's Office
 _____ members of any other district attorney's office
 _____ members of any Capital Defender's office
 _____ any criminal defense attorneys
 _____ any judges, court commissioners, or referees
 _____ any court personnel (i.e., court reporters, clerks, etc.)
 _____ any other type of attorneys or paralegals
 _____ any parole or probation officers
 _____ any person connected with the criminal justice system in any capacity
 _____ any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes _____ No X

If yes, please explain. _____

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated].

NO

Have you ever done any of the following:

(a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes _____ No X

(b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes _____ No X

(c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes _____ No X

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes X No

If yes, please explain:

Bankruptcy

Have you ever known anyone who died as a result of violence? Yes No X

If yes, please explain:

Have you ever been threatened or in fear for your life? Yes No X

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes No X

Do you, or any member of your family own one or more firearms? Yes X No

If yes, please describe: me + spouse

What is your opinion about counselors, therapists, psychologists, and psychiatrists?

I feel they help with people's lives + emotions.

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way?

No opinion - if ~~the~~ the information is proven - so be it

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

1. I believe that the death penalty is the appropriate form of punishment in all murder cases.
- ② believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.
5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way?

See above

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

not sure

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes ___ No X

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often

About the right amount

Too seldom

Other X

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes _____ No _____ Not sure

Regardless of which box you checked, please explain your answer:

depends on situation

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe

No, less severe

Just as severe

Please explain:

they're not dead

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes _____ No X

If YES, please explain: _____

Do you hold to any religious, moral feelings or philosophical principles that would affect your ability to vote for the death penalty as a judgment in this case?

Yes _____ No X Please explain: _____

Are you affiliated with any organization that advocates in favor of the death penalty?

Yes _____ No X

If yes, what organization? _____

Are you affiliated with any organization that advocates against the death penalty?

Yes _____ No X

If yes, what organization? _____

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

I don't think so -

Is there any matter that has not been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning any other subject that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes _____ No X If yes, please explain:

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes _____

No X Please explain _____

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: 2/1/10

104
Juror Number

J. K. Guler
Signature

#222

"Qualified" 096

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

1. Full Name: Amy Elizabeth McDonald

Age: 26 Date of Birth: [REDACTED]

2. Any other names you have used: N/A

Address: [REDACTED]

3. How long have you lived at your present address? 9 yrs.

4. Marital Status (please check)

Single ☒

Separated ☐

Widowed ☐

Living with someone as a couple ☐ Divorced and Remarried ☐ years

Married ☐ Years ☐

Divorced ☐ Years ☐

Never Married ☒

5. If living with someone as a couple, please state your partner's name: _____

6. Are you a citizen of the United States? Yes ☒ No ☐

7. Racial or ethnic group: White

COMMON PLEAS AND
GENERAL SESSIONS

2011 DEC 31 A 11:44

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ANDERSON CO

A TRUE COPY

MAR 12 2012

Linda A. Kelly
CLERK OF COURT

EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed

Employed full-time

Employed part-time

Working in the home

Unemployed/laid-off

Retired/student

Disabled/unable to work

2. Name of current employer:

Ameri-Pak, Inc.

3. What is your present occupation, title or profession?

Office Manager

4. Have you held any previous positions with the same employer?

NO

5. Number of years employed as above:
- 1.5

6. Are you the primary wage earner for your family? Yes:
- X
- No:
-

7. Are you salaried or hourly employee? salaried:
- X
- hourly:
-

8. Do you rely on overtime pay to meet your monthly household expenses?
-
- Yes:
-
- No:
- X

9. Do you supervise other employees? Yes
-
- No
- X

10. If YES, how many employees do you supervise?
-

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace?
- 45

12. Do you have a "second" job? YES
- (NO)

13. If YES, what is it and where are you employed?
-

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

Previously employed by Seven Products Plus as
customer service, accounting, & human
resources. Employed for 4 years there.

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment?
-

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | | |
|---|--------------------------------------|-------------------------------------|
| (a) Hearing problems | Yes | ☒ No |
| (b) Seeing problems, even with glasses | Yes | ☒ No |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes | ☒ No |
| (d) Regular doctor appointments | Yes | ☒ No |
| (e) Young children to care for | ☒ Yes | No |
| (f) Medical condition affecting attention | Yes | ☒ No |
| (g) Difficulty sitting for long periods of time | Yes | ☒ No |

If you answered YES to any of these questions, please explain: I have a six-year old daughter.

2. Are you taking medications regularly? Yes _____ No X

If yes, please list the medications:

Do any of your medications affect your memory or concentration? Yes _____ No X

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes _____ No X

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

No

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____

No X

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 24 years

2. Other places you have lived and length of time:

N/A

3. How long have you lived at your current residence? 9 years @ "permanent"; 3 month @

4. Do you own or rent your current residence? Rent

current

5. Who else lives at your residence?

Name

Relationship

Kate Mann

Daughter

6. For each of your children (including foster or step-children), please give the following information:

<u>Sex</u>	<u>Age</u>	<u>Occupation/Grade in School/Name of School</u>	<u>Lives at Home</u>
<u>F</u>	<u>6</u>	<u>West Anderson Christian Academy</u>	<u>Yes</u>
_____	_____	_____	_____
_____	_____	_____	_____

7. Please give the occupation of the spouses of your married children:

N/A

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student.

Relationship

Age

Occupational Status

N/A

If the person(s) described in No. 8 above is employed, please state for each person:

<u>Name of Individual and Location of Job</u>	<u>Title and Duties</u>	<u>Previous Jobs</u>

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

spending time outdoors, cooking, activities with my daughter

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

Anderson Independent

11. Do you frequently follow news reports concerning current events?

Yes ☐ No ☒ If yes, please describe your primary sources of information.

Not really on a daily basis

12. What television and radio programs do you frequently watch or listen to?

WYFF 4 NEWS

13. How often do you watch Court TV or other "true" courtroom show on TV? Not often

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☐ No ☒

If so, please explain:

15. What type of books do you read:

Not a big book reader

16. What is the last book you read? The Shack

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

N/A

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

NO

19. Have you ever watched all or most of a trial from start to finish? Yes ☐ No ☒

20. Is there any trial that you followed where you disagreed with the verdict?

Yes ☐ No ☒ Explain:

21. Do you use or have access to the Internet? Yes ☒ No ☐

22. If yes, how much time do you spend on the Internet? 1-2 hours daily

23. For what purpose? business & personal use

24. What type of Internet sites or blogs do you frequent?

bank websites, Facebook, Independent.com

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes ☒ No ☐

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes ☒ No ☐

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes X No _____
28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?** Yes X No _____
29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?** Yes X No _____

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? some college
2. Please list the schools you have attended and approximate dates you attended each school:
3. Grade School: Calhoun Elementary Dates: 90-96
4. Junior High School: McCants Dates: 96-98
5. High School: TL Hanna Dates: 98-01
6. College: Tri-County Tech Dates: 01-03 & 2006
7. Vocational or Trade School: _____ Dates: _____
8. Professional School: _____ Dates: _____
9. Graduate School: _____ Dates: _____
10. If you are a student, please describe your area of study: _____
11. If you attended college, vocational or technical school, or graduate school, please list:
12. Your major subject or field of study: Criminal Justice & Accounting
13. Any degrees or diplomas which you hold: None

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply)

Law

Criminal Justice

Sociology

Social Work/Counseling

Medicine

Journalism

Biology

Law Enforcement

Criminology

Psychology

Forensic Sciences (e.g. serology, fingerprinting, etc.)

Nursing

DNA

Chemistry

Psychiatry

If you circled anything in Question 14, please describe: courses taken while studying criminal justice

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? _____

16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: _____

17. Have you ever served in the armed forces, or in the National Guard?

Yes ___ No X

a. If yes, what branch? _____ Active ___ Reserve ___

b. Highest Rank _____ Dates of service: _____

c. Duties: _____

d. What medals, honors, or commendations did you receive, if any?

e. Did you attend any special schools or receive any special training? Yes ___ No ___ If Yes, please describe:

f. Did you serve in combat? Yes ___ No ___

g. Were you drafted or did you voluntarily enlist? Drafted ___ Enlisted ___

h. Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes ___ No ___

i. If yes, please explain (i.e., a court martial or a board of inquiry):

16. If any members of your family served or are now serving in the armed forces, for each member please list the following:

Relationship

Branch Rank Achieved

Duties

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes X No _____
2. What is your religious affiliation, if any? N/A
3. What is/was your parents' religious affiliation, if any? N/A
4. Have you ever changed your religious affiliation? Yes _____ No X
5. If yes, what was your previous affiliation, and why did you change?

6. Do you attend any religious services? Yes X No _____
7. If yes, how often do you attend? WEEKLY
8. Are you involved with religious activities? Yes _____ No X
9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

NONE

Are you an active member in any of these groups? Yes _____ No _____

10. If yes, please explain your activities with each group:

11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes _____ No X

If yes, are you an active member? Yes _____ No _____

If yes, please list the organizations and explain your activities:

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes _____	No <u>X</u>
Mothers Against Drunk Driving	Yes _____	No <u>X</u>
Any pro-death penalty group	Yes _____	No <u>X</u>
Any anti-death penalty group	Yes _____	No <u>X</u>
Parents/Families of Murdered Children	Yes _____	No <u>X</u>
Any group that campaigns for stricter criminal penalties	Yes _____	No <u>X</u>
Any group that campaigns for more lenient criminal penalties	Yes _____	No <u>X</u>
Any group that advocates victims rights	Yes _____	No <u>X</u>
Any group that advocates for prisoners' rights	Yes _____	No <u>X</u>

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
-----------------------------------	----------------------	---------------------

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes _____

No X

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)?

Yes _____ No X If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes (X) No

(b) Your Spouse () Yes (X) No

If yes, list office. Location and dated of service:

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes _____ No X

If yes, for each occasion, please state:

<u>When</u>	<u>Where</u>	<u>Civil /Criminal/Court Martial</u>	<u>Nature of Case</u>
-------------	--------------	--------------------------------------	-----------------------

Did you deliberate? Yes _____ No _____

If yes, what kind of case? _____

Was there a verdict?

Were you the Foreperson? Yes _____ No _____

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes _____ No X

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis?

Yes _____ No X

If yes, please identify such person and describe his/her relationship to you:

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes _____ No X

If YES, please state the name of the person, their relationship to you, and their current occupation:

Have you ever hired a lawyer for any reason? Yes _____ No X

Please explain:

Have you, a family member or close friend ever been:

- | | | |
|---|-----------|-------------|
| (a) accused of a crime (more serious than a speeding ticket) | Yes _____ | No <u>X</u> |
| (b) arrested for a crime (more serious than a speeding ticket) | Yes _____ | No <u>X</u> |
| (c) charged with a crime (more serious than a speeding ticket) | Yes _____ | No <u>X</u> |
| (d) convicted of a crime (more serious than a speeding ticket) | Yes _____ | No <u>X</u> |
| (e) investigated for a crime? (more serious than a speeding ticket) | Yes _____ | No <u>X</u> |
| (f) the victim of a crime | Yes _____ | No <u>X</u> |
| (g) a witness to a crime | Yes _____ | No <u>X</u> |

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person:

If you have ever been the victim of a crime, please indicate the following information, if you know it:

Name of perpetrator: _____

Age of perpetrator at time of crime: _____ Your age at time of crime _____

Relationship of the perpetrator to you? _____

Please describe the nature of the offense and any injuries or loss you suffered:

Were there any court proceedings? Yes ___ No ___ Did you attend? Yes ___ No ___

Did you testify? Yes: ___ No: ___

Do you feel you were treated fairly by the justice system?

Please explain:

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it:

What is the relationship of the victim to you? _____

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes _____ No _____

Was the perpetrator caught? Yes _____ No _____

Were there any court proceedings? Yes _____ No _____

Did you attend any of the court proceedings? Yes _____ No _____

Did you testify? Yes _____ No _____

Please describe the nature of the offense and any injuries or loss suffered?

When did you learn of the incident? _____

Do you feel the victim was treated fairly by the justice system?

Please explain. _____

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes _____ No X

(a) If the witness was you, please answer the following questions

Describe the crime: _____

Did you report the crime to the police? _____ Yes _____ No

If not, why not? _____

Did you give a statement to the police? Yes _____ No _____

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes _____ No _____

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

- (a) any city, county, federal or state prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes _____ No X
- (b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes _____ No X
- (c) any city, county, federal or state correctional institution or detention facility? Yes _____ No X
- (d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes _____ No X
- (e) any probation department or parole department? Yes _____ No X
- (f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes _____ No X
- (g) any other agency or organization connected with the criminal justice system (e.g. ACLU, Citizens for Law and Order, etc.)? Yes _____ No X

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

- ☐ the Anderson County Solicitor's Office
☐ members of any other district attorney's office
☐ members of any Capital Defender's office
☐ any criminal defense attorneys
☐ any judges, court commissioners, or referees
☐ any court personnel (i.e., court reporters, clerks, etc.)
☐ any other type of attorneys or paralegals
☐ any parole or probation officers
☐ any person connected with the criminal justice system in any capacity
☐ any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes ☐ No ☒

If yes, please explain. _____

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated].

No

Have you ever done any of the following:

(a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes

☐ No ☒

(b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes ☐ No ☒

(c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes

☐ No ☒

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes X No

If yes, please explain:

School "field trips" ; called for jury duty
several years ago but not picked

Have you ever known anyone who died as a result of violence? Yes No X

If yes, please explain:

Have you ever been threatened or in fear for your life? Yes No X

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes No X

Do you, or any member of your family own one or more firearms? Yes X No

If yes, please describe: Everyone (almost) I know owns at least one firearm.

What is your opinion about counselors, therapists, psychologists, and psychiatrists?

They can be helpful for those who
seek their services.

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way?

I am not a very opinionated person, but I do believe that death is an appropriate form of punishment.

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

- ~~1.~~ I believe that the death penalty is the appropriate form of punishment in all murder cases.
2. I believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.
5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way?

It could be an appropriate form of punishment in a particular case.

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes ___ No X

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often

About the right amount

Too seldom

Other _____

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes ☒

No ☒

Regardless of which box you checked, please explain your answer:

"severe" to ^{me} means life changing, tramatic, etc.
It could also be severe depending on the circumstances.

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe

No, less severe

Just as severe

Please explain: with^a life sentence you are given the chance to live. with a death sentence your live is taken from you without choice.

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes _____ No ☒

If YES, please explain: _____

Do you hold to any religious, moral feelings or philosophical principles that would affect your ability to vote for the death penalty as a judgment in this case?

Yes _____ No ☒ Please explain: _____

Are you affiliated with any organization that advocates in favor of the death penalty?

Yes _____ No ☒

If yes, what organization? _____

Are you affiliated with any organization that advocates against the death penalty?

Yes _____ No ☒

If yes, what organization? _____

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

Is there any matter that **has not** been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning **any other subject** that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes ☐ No ☒ If yes, please explain:

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes ☐

No ☒ Please explain ☐

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: 12/30/09

222
Juror Number

anyu daniel
Signature

247

"Qualified" 3/14

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

1. Full Name: Billy Gene Morgan

Age: 67 Date of Birth [REDACTED]

2. Any other names you have used: Bill

Address [REDACTED]

3. How long have you lived at your present address? 37 years

4. Marital Status (please check)

Single _____ Married ☒ Years 44
Separated _____ Divorced _____ Years _____
Widowed _____ Never Married _____
Living with someone as a couple _____ Divorced and Remarried _____ years

5. If living with someone as a couple, please state your partner's name: _____

6. Are you a citizen of the United States? Yes ☒ No _____

7. Racial or ethnic group: white

FILED-CLERK'S OFFICE
MAR 22 A 8:53
COMMON PLEAS
GENERAL SESSIONS

A TRUE COPY
MAR 12 2012
Richard A. Kelly
CLERK OF COURT

EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed
 Employed full-time
 Employed part-time
 Working in the home

Unemployed/laid-off
 Retired/student
 Disabled/unable to work

2. Name of current employer:

Ingles

3. What is your present occupation, title or profession?

Bagboy

4. Have you held any previous positions with the same employer?

No

5. Number of years employed as above:
- 12

6. Are you the primary wage earner for your family? Yes: ___ No:
- ☒

7. Are you salaried or hourly employee? salaried: ___ hourly:
- ☒

8. Do you rely on overtime pay to meet your monthly household expenses?
-
- Yes: ___ No:
- ☒

9. Do you supervise other employees? Yes ___ No
- ☒

10. If YES, how many employees do you supervise? _____

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace?
- 30

12. Do you have a "second" job? YES
- ☒
- NO

13. If YES, what is it and where are you employed? _____

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

Verizon Business - Field Tech

1977 - 2008

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment?
- Secretary Covenant Baptist

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- (a) Hearing problems Yes ☒ No ☐ *hearing loss*
- (b) Seeing problems, even with glasses Yes ☐ No ☒
- (c) Someone who is sick or disabled, for whom you are a primary caregiver Yes ☐ No ☒
- (d) Regular doctor appointments Yes ☒ No ☐
- (e) Young children to care for Yes ☐ No ☒
- (f) Medical condition affecting attention Yes ☐ No ☒
- (g) Difficulty sitting for long periods of time Yes ☐ No ☒

If you answered YES to any of these questions, please explain: *I have a stent and check blood ever month - Have Roaring in ears*

2. Are you taking medications regularly? Yes ☒ No ☐

If yes, please list the medications:

*Vytorin, diltiazem, Rythmol, celebrex
Metoprolol, Warfarin*

Do any of your medications affect your memory or concentration? Yes ☐ No ☒

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes ☐ No ☒

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

No

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____

No ☒

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 40 years
2. Other places you have lived and length of time:
Abbeville S.C. 3 years
Commerce Ga. 22 years
3. How long have you lived at your current residence? 37 years
4. Do you own or rent your current residence? Own
5. Who else lives at your residence?

<u>Name</u>	<u>Relationship</u>
<u>Anne L. Morgan</u>	<u>Wife</u>

6. For each of your children (including foster or step-children), please give the following information:

<u>Sex</u>	<u>Age</u>	<u>Occupation/Grade in School/Name of School</u>	<u>Lives at Home</u>
<u>M</u>	<u>48</u>	<u>Computers - High School - Greenwood</u>	<u>NO</u>
<u>M</u>	<u>43</u>	<u>Supervisor - Tri County Tech</u>	<u>NO</u>
<u>F</u>	<u>41</u>	<u>School Teacher - Clemson</u>	<u>NO</u>

7. Please give the occupation of the spouses of your married children:

<u>Real Estate</u>
<u>Bosch Plant</u>
<u>School Teacher Westside High</u>

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student.

<u>Relationship</u>	<u>Age</u>	<u>Occupational Status</u>

If the person(s) described in No. 8 above is employed, please state for each person:

Name of Individual and Location of Job	Title and Duties	Previous Jobs

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

Church worker

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

Anderson Independent

11. Do you frequently follow news reports concerning current events?

Yes ☒ No ☐ If yes, please describe your primary sources of information.

Newspaper
T.V.

12. What television and radio programs do you frequently watch or listen to?

NCIS
Miami CSI

13. How often do you watch Court TV or other "true" courtroom show on TV?

hardly ever

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☐ No ☒

If so, please explain:

15. What type of books do you read:

bible

16. What is the last book you read? bible

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

No

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

No

19. Have you ever watched all or most of a trial from start to finish? Yes ☒ No ☐

20. Is there any trial that you followed where you disagreed with the verdict?

Yes ☐ No ☒ Explain:

21. Do you use or have access to the Internet? Yes ☒ No ☐

22. If yes, how much time do you spend on the Internet? 1/2 hour per day

23. For what purpose? Email + Face book

24. What type of Internet sites or blogs do you frequent?

Face book

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes ☒ No ☐

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes ☒ No ☐

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes ☒ No ☐

28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?**

Yes ✓ No

29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?**

Yes ☒ No ☐

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? high school

2. Please list the schools you have attended and approximate dates you attended each school:

3. Grade School: Cathesville Hs. Dates: 1948/1956

4. Junior High School: _____ Dates: _____

5. High School: Commerce Ga Dates: 1958/1960

6. College: _____ Dates: _____

7. Vocational or Trade School: _____ Dates: _____

8. Professional School: _____ Dates: _____

9. Graduate School: _____ Dates: _____

10. If you are a student, please describe your area of study: _____

11. If you attended college, vocational or technical school, or graduate school, please list:

12. Your major subject or field of study: NO

13. Any degrees or diplomas which you hold: *No*

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply)

Law	Law Enforcement	Psychiatry
Criminal Justice	Criminology	
Sociology	Psychology	
Social Work/Counseling	Forensic Sciences (e.g. serology, fingerprinting, etc.)	
Medicine	Nursing	
Journalism	DNA	
Biology	Chemistry	

If you circled anything in Question 14, please describe:

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? TM County Tech

16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: _____

17. Have you ever served in the armed forces, or in the National Guard?

Yes ___ No ☒

a. If yes, what branch? _____ Active ___ Reserve ___

b. Highest Rank _____ Dates of service: _____

c. Duties: _____

d. What medals, honors, or commendations did you receive, if any?

e. Did you attend any special schools or receive any special training? Yes ___ No ___ If Yes, please describe:

f. Did you serve in combat? Yes ___ No ___

g. Were you drafted or did you voluntarily enlist? Drafted ___ Enlisted ___

h. Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes ___ No ___

i. If yes, please explain (i.e., a court martial or a board of inquiry):

16. If any members of your family served or are now serving in the armed forces, for each member please list the following:

<u>Relationship</u>	<u>Branch Rank Achieved</u>	<u>Duties</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes ☒ No ☐
2. What is your religious affiliation, if any? Baptist
3. What is/was your parents' religious affiliation, if any? Baptist
4. Have you ever changed your religious affiliation? Yes ☐ No ☒
5. If yes, what was your previous affiliation, and why did you change?

-
6. Do you attend any religious services? Yes ☒ No ☐
 7. If yes, how often do you attend? 3 times a week
 8. Are you involved with religious activities? Yes ☒ No ☐
 9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

Are you an active member in any of these groups? Yes ☐ No ☒

10. If yes, please explain your activities with each group:

-
-
-
11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes ☐ No ☒

If yes, are you an active member? Yes ☐ No ☐

If yes, please list the organizations and explain your activities:

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes _____	No ☒
Mothers Against Drunk Driving	Yes _____	No ☒
Any pro-death penalty group	Yes _____	No ☒
Any anti-death penalty group	Yes _____	No ☒
Parents/Families of Murdered Children	Yes _____	No ☒
Any group that campaigns for stricter criminal penalties	Yes _____	No ☒
Any group that campaigns for more lenient criminal penalties	Yes _____	No ☒
Any group that advocates victims rights	Yes _____	No ☒
Any group that advocates for prisoners' rights	Yes _____	No ☒

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
-----------------------------------	----------------------	---------------------

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes _____
No ☒

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)?
Yes _____ No ☒ If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes (☒) No
(b) Your Spouse () Yes (☒) No

If yes, list office. Location and dated of service:

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes _____ No ☒

If yes, for each occasion, please state:

When Where Civil /Criminal/Court Martial Nature of Case

Did you deliberate? Yes _____ No _____

If yes, what kind of case? _____

Was there a verdict?

Were you the Foreperson? Yes _____ No _____

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes _____ No ☒

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis?

Yes ☒ No _____

If yes, please identify such person and describe his/her relationship to you:

Richard McCollan - Friend

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes _____ No ☒

If YES, please state the name of the person, their relationship to you, and their current occupation:

Have you ever hired a lawyer for any reason? Yes _____ No ☒

Please explain:

Have you, a family member or close friend ever been:

- | | | |
|---|-----------|--|
| (a) accused of a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (b) arrested for a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (c) charged with a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (d) convicted of a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (e) investigated for a crime? (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (f) the victim of a crime | Yes _____ | No ☒ |
| (g) a witness to a crime | Yes _____ | No ☒ |

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person:

If you have ever been the victim of a crime, please indicate the following information, if you know it:

Name of perpetrator: _____

Age of perpetrator at time of crime: _____ Your age at time of crime: _____

Relationship of the perpetrator to you? _____

Please describe the nature of the offense and any injuries or loss you suffered:

Where were there any court proceedings? Yes _____ No _____ Did you attend? Yes _____ No _____

Did you testify? Yes: _____ No: _____

Do you feel you were treated fairly by the justice system?

Please explain:

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it:

What is the relationship of the victim to you? _____

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes _____ No _____

Was the perpetrator caught? Yes _____ No _____

Were there any court proceedings? Yes _____ No _____

Did you attend any of the court proceedings? Yes _____ No _____

Did you testify? Yes _____ No _____

Please describe the nature of the offense and any injuries or loss suffered?

When did you learn of the incident? _____

Do you feel the victim was treated fairly by the justice system?

Please explain. _____

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes _____ No ☒

(a) If the witness was you, please answer the following questions

Describe the crime: _____

Did you report the crime to the police? Yes _____ No _____

If not, why not? _____

Did you give a statement to the police? Yes _____ No _____

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes _____ No _____

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

- (a) any city, county, federal or state prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes _____ No ☒
- (b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes _____ No ☒
- (c) any city, county, federal or state correctional institution or detention facility? Yes _____ No ☒
- (d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes _____ No ☒
- (e) any probation department or parole department? Yes _____ No ☒
- (f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes _____ No ☒
- (g) any other agency or organization connected with the criminal justice system (e.g. ACLU, Citizens for Law and Order, etc.)? Yes _____ No ☒

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

no the Anderson County Solicitor's Office

no members of any other district attorney's office

no members of any Capital Defender's office

no any criminal defense attorneys

no any judges, court commissioners, or referees

no any court personnel (i.e., court reporters, clerks, etc.)

no any other type of attorneys or paralegals

no any parole or probation officers

no any person connected with the criminal justice system in any capacity

no any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes _____ No ✓

If yes, please explain. _____

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated].

no

Have you ever done any of the following:

(a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes _____ No ✓

(b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes _____ No ✓

(c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes _____ No ✓

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes ☒ No ☐

If yes, please explain:

Character witness

Have you ever known anyone who died as a result of violence? Yes ☐ No ☒

If yes, please explain:

Have you ever been threatened or in fear for your life? Yes ☐ No ☒

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes ☐ No ☒

Do you, or any member of your family own one or more firearms? Yes ☒ No ☐

If yes, please describe:

410 Shotgun - 38 revolver - 22 revolver - 357 revolver

What is your opinion about counselors, therapists, psychologists, and psychiatrists?

Don't have one

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way?

If the crime fits, so be it.

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

1. I believe that the death penalty is the appropriate form of punishment in all murder cases.
- ② I believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.
5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way?

If the case warrants it, I would be for it.

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

Same as mine

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes ___ No ✓

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often

About the right amount

Too seldom

Other _____

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes ☒ No _____

Regardless of which box you checked, please explain your answer:

Get murderers off our streets

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe

No, less severe

Just as severe

Please explain:

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes _____ No ☒

If YES, please explain: _____

Do you hold to any religious, moral feelings or philosophical principles that would affect your ability to vote for the death penalty as a judgment in this case?

Yes _____ No ☒ Please explain: *If this is what is determined, so be it.*

Are you affiliated with any organization that advocates in favor of the death penalty?

Yes _____ No ☒

If yes, what organization? _____

Are you affiliated with any organization that advocates against the death penalty?

Yes _____ No ☒

If yes, what organization? _____

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

No

Is there any matter that has not been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning any other subject that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes _____ No ☒ If yes, please explain:

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes _____

No ☒ Please explain what case are we talking about.

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: 12/17/09
247
Juror Number _____

Bill G. Morgan
Signature

#248

"Qualified" 3132

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

1. Full Name: Angela Alice Massey Morrison

Age: 53

Date of Birth: [REDACTED] 6

2. Any other names you have used: Angie (short for Angela)

Address: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

3. How long have you lived at your present address? 11 yrs

4. Marital Status (please check)

Single

Married ✓ Years 16

Separated

Divorced Years

Widowed

Never Married

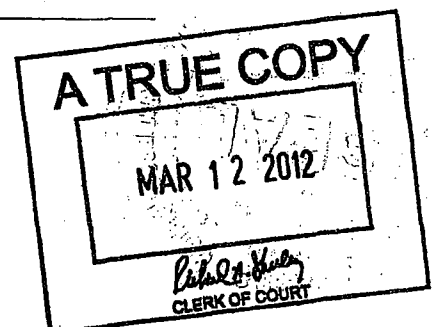
Living with someone as a couple Divorced and Remarried years

5. If living with someone as a couple, please state your partner's name:

6. Are you a citizen of the United States? Yes ✓ No

7. Racial or ethnic group: White

FILED-CLERK'S OFFICE
ANDERSON SC
MAR 12 30 A 10:27
COMMON PLEAS AND
GENERAL SESSIONS



EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed
Employed full-time
 Employed part-time
 Working in the home

Unemployed/laid-off
 Retired/student
 Disabled/unable to work

2. Name of current employer:

Anderson School District V

3. What is your present occupation, title or profession?

Teacher's Assistant

4. Have you held any previous positions with the same employer?

No

5. Number of years employed as above: 9

6. Are you the primary wage earner for your family? Yes: ___ No: ✓

7. Are you salaried or hourly employee? salaried: ___ hourly: ✓

8. Do you rely on overtime pay to meet your monthly household expenses?
 Yes: ___ No: ✓

9. Do you supervise other employees? Yes ___ No ✓

10. If YES, how many employees do you supervise? _____

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace? 60

12. Do you have a "second" job? YES (NO)

13. If YES, what is it and where are you employed? _____

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment? Production/Michelin Tire/Sandy Springs, SC

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | | |
|---|-----|-----------|
| (a) Hearing problems | Yes | <u>No</u> |
| (b) Seeing problems, even with glasses | Yes | <u>No</u> |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes | <u>No</u> |
| (d) Regular doctor appointments | Yes | <u>No</u> |
| (e) Young children to care for | Yes | <u>No</u> |
| (f) Medical condition affecting attention | Yes | <u>No</u> |
| (g) Difficulty sitting for long periods of time | Yes | <u>No</u> |

If you answered YES to any of these questions, please explain: _____

2. Are you taking medications regularly? Yes _____ No ✓

If yes, please list the medications:

Do any of your medications affect your memory or concentration? Yes _____ No No Meds

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes _____ No ✓

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

No

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____
No ✓

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 12 years (as a child) 16 years (as an adult)
2. Other places you have lived and length of time:
Greenville, SC - 11 years
Westminster, SC - 14 years
3. How long have you lived at your current residence? 11 years
4. Do you own or rent your current residence? Own
5. Who else lives at your residence?

Name	Relationship
David R. Morrison	Husband
Meredith L. Miller	Daughter

6. For each of your children (including foster or step-children), please give the following information:

Sex	Age	Occupation/Grade in School/Name of School	Lives at Home
F	21	Student/Senior/Anderson Univ.	Lives at Home
M	24	U.S. Military (Navy)/Petty Officer 1st Class	Stationed in Japan C/O Yokosuka Naval Base

7. Please give the occupation of the spouses of your married children:

NA

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student. NR

Relationship	Age	Occupational Status

If the person(s) described in No. 8 above is employed, please state for each person: NA

Name of Individual and Location of Job

Title and Duties

Previous Jobs

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

Read, walk, attend sporting activities, spend
time with family, gardening

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

Anderson Independent, Southern Living,
Good Housekeeping

11. Do you frequently follow news reports concerning current events?

Yes ☒ No ☐ If yes, please describe your primary sources of information.

Newspaper, television

12. What television and radio programs do you frequently watch or listen to?

Army Wives, Grays Anatomy, Dateline,
Nightly News

13. How often do you watch Court TV or other "true" courtroom show on TV?

never

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☒ No ☐

If so, please explain:

Nudity, violence, racism

15. What type of books do you read:

Fiction and non-fiction

16. What is the last book you read? 7 Habits of Highly Effective People
by Stephen Covey

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

No

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

No

19. Have you ever watched all or most of a trial from start to finish? Yes ☐ No ☒

20. Is there any trial that you followed where you disagreed with the verdict?

Yes ☐ No ☒ Explain:

21. Do you use or have access to the Internet? Yes ☒ No ☐

22. If yes, how much time do you spend on the Internet? 10 minutes per day

23. For what purpose? Communicate with my son in the U.S. Navy

24. What type of Internet sites or blogs do you frequent?

① Anderson School District v website for work purposes
 ② U.S. Navy's website in regard to daily news

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes ☒ No ☐

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes ☒ No ☐

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply) None of these

Law	Law Enforcement	Psychiatry
Criminal Justice	Criminology	
Sociology	Psychology	
Social Work/Counseling	Forensic Sciences (e.g. serology, fingerprinting, etc.)	
Medicine	Nursing	
Journalism	DNA	
Biology	Chemistry	

If you circled anything in Question 14, please describe:

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? 12 years

16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: None

17. Have you ever served in the armed forces, or in the National Guard?

Yes ☐ No ☒

- If yes, what branch? _____ Active ☐ Reserve ☐
- Highest Rank _____ Dates of service: _____
- Duties: _____
- What medals, honors, or commendations did you receive, if any?
- Did you attend any special schools or receive any special training? Yes ☐ No ☐ If Yes, please describe:
- Did you serve in combat? Yes ☐ No ☐
- Were you drafted or did you voluntarily enlist? Drafted ☐ Enlisted ☐
- Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes ☐ No ☐
- If yes, please explain (i.e., a court martial or a board of inquiry):

16. If any members of your family served or are now serving in the armed forces, for each member please list the following: Daniel Blake Miller

<u>Relationship</u>	<u>Branch Rank Achieved</u>	<u>Duties</u>
<u>Son</u>	<u>U.S. Navy / 1st Class Petty Officer</u>	<u>Cryptologic Technology</u>
_____	_____	_____
_____	_____	_____

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes ☒ No ☐
2. What is your religious affiliation, if any? Baptist
3. What is/was your parents' religious affiliation, if any? Baptist
4. Have you ever changed your religious affiliation? Yes ☐ No ☒
5. If yes, what was your previous affiliation, and why did you change?

-
6. Do you attend any religious services? Yes ☒ No ☐
 7. If yes, how often do you attend? 2 times per week
 8. Are you involved with religious activities? Yes ☒ No ☐
 9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

- Sunday School at my church
- Teach Bible school during summer
- Donate money to needy

Are you an active member in any of these groups? Yes ☒ No ☐

10. If yes, please explain your activities with each group:

I participate by donating my time.
and my family donates funds to
the needy at least twice a year

11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes ☐ No ☒

If yes, are you an active member? Yes ☐ No ☐

If yes, please list the organizations and explain your activities:

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes _____	No ☒
Mothers Against Drunk Driving	Yes _____	No ☒
Any pro-death penalty group	Yes _____	No ☒
Any anti-death penalty group	Yes _____	No ☒
Parents/Families of Murdered Children	Yes _____	No ☒
Any group that campaigns for stricter criminal penalties	Yes _____	No ☒
Any group that campaigns for more lenient criminal penalties	Yes _____	No ☒
Any group that advocates victims rights	Yes _____	No ☒
Any group that advocates for prisoners' rights	Yes _____	No ☒

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
-----------------------------------	----------------------	---------------------

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes _____
No ☒

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)?
Yes _____ No ☒ If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes () No
(b) Your Spouse (☒) Yes () No

If yes, list office. Location and dated of service:

• County Fire Chiefs Association of Anderson County
• Assistant Fire Chief of Centerville Fire Dept.,
Anderson County

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes _____ No ☒

If yes, for each occasion, please state:

<u>When</u>	<u>Where</u>	<u>Civil /Criminal/Court Martial</u>	<u>Nature of Case</u>
-------------	--------------	--------------------------------------	-----------------------

Did you deliberate? Yes _____ No ☒

If yes, what kind of case? _____

Was there a verdict?

Were you the Foreperson? Yes _____ No ☒

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes _____ No ☒

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis?

Yes _____ No ☒

If yes, please identify such person and describe his/her relationship to you:

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes _____ No ☒

If YES, please state the name of the person, their relationship to you, and their current occupation:

Have you ever hired a lawyer for any reason? Yes _____ No ☒

Please explain:

Have you, a family member or close friend ever been:

- | | | |
|---|-----------|--|
| (a) accused of a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (b) arrested for a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (c) charged with a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (d) convicted of a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (e) investigated for a crime? (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (f) the victim of a crime | Yes _____ | No ☒ |
| (g) a witness to a crime | Yes _____ | No ☒ |

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person:

If you have ever been the victim of a crime, please indicate the following information, if you know it: *NA*

Name of perpetrator: _____

Age of perpetrator at time of crime: _____ Your age at time of crime _____

Relationship of the perpetrator to you? _____

Please describe the nature of the offense and any injuries or loss you suffered:

Where there any court proceedings? Yes___ No___ Did you attend? Yes___ No___ *NA*

Did you testify? Yes: ___ No: ___

Do you feel you were treated fairly by the justice system?

Please explain:

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it: *NA*

What is the relationship of the victim to you? _____

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes _____ No _____

Was the perpetrator caught? Yes _____ No _____

Were there any court proceedings? Yes _____ No _____

Did you attend any of the court proceedings? Yes _____ No _____

Did you testify? Yes _____ No _____

Please describe the nature of the offense and any injuries or loss suffered?

n/a

When did you learn of the incident? n/a

Do you feel the victim was treated fairly by the justice system? n/a

Please explain.

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes ☐ No ☒

(a) If the witness was you, please answer the following questions

Describe the crime: n/a

Did you report the crime to the police? ☐ Yes ☐ No

If not, why not? _____

Did you give a statement to the police? Yes ☐ No ☐

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes ☐ No ☐

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

n/a

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

(a) any city, county, federal or state prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes ☐ No ☒

(b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes ☐ No ☒

(c) any city, county, federal or state correctional institution or detention facility? Yes ☐ No ☒

(d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes ☐ No ☒

(e) any probation department or parole department? Yes ☐ No ☒

(f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes ☐ No ☒

(g) any other agency or organization connected with the criminal justice system

(e.g. ACLU, Citizens for Law and Order, etc.)? Yes ☐ No ☒

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

☐ the Anderson County Solicitor's Office
☐ members of any other district attorney's office
☐ members of any Capital Defender's office **no**
☐ any criminal defense attorneys
☐ any judges, court commissioners, or referees
☐ any court personnel (i.e., court reporters, clerks, etc.)
☐ any other type of attorneys or paralegals
☐ any parole or probation officers
☐ any person connected with the criminal justice system in any capacity
☐ any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes ☐ No ☒

If yes, please explain.

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated]. **no**

Have you ever done any of the following:

- (a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes ☐ No ☒
- (b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes ☐ No ☒
- (c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes ☐ No ☒

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes ____ No ✓
If yes, please explain:

Have you ever known anyone who died as a result of violence? Yes ____ No ✓

If yes, please explain:

Have you ever been threatened or in fear for your life? Yes ____ No ✓

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes ____ No ____

Do you, or any member of your family own one or more firearms? Yes ____ No ✓
If yes, please describe:

What is your opinion about counselors, therapists, psychologists, and psychiatrists?

I do not have one

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way?

I am completely supportive of the death penalty.

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

1. I believe that the death penalty is the appropriate form of punishment in all murder cases.
- ② I believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.
5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way?

I believe the sentence of life without the possibility of parole could be deemed appropriate depending upon the nature of the crime, criminal record of the individual on trial, and the age of the individual on trial.

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

My spouse believes the same as I.

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes ___ No ✓

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often

About the right amount

Too seldom

Other _____

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes _____ No ✓

Regardless of which box you checked, please explain your answer:

For the individual sentenced to life imprisonment without parole, he/she has the opportunity to wake up each day and live out the remainder of his/her time left on earth. His/her victim may not have that opportunity.

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe

No, less severe

Just as severe

Please explain:

I believe he/she gets another chance at life, to some degree. That part is unfair to the victim and his/her family.

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes _____ No ✓

If YES, please explain: _____

Do you hold to any religious, moral feelings or philosophical principles that would affect your ability to vote for the death penalty as a judgment in this case?

Yes _____ No ✓ Please explain: _____

Are you affiliated with any organization that advocates in favor of the death penalty?

Yes _____ No ✓

If yes, what organization? _____

Are you affiliated with any organization that advocates against the death penalty?

Yes _____ No ✓

If yes, what organization? _____

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

No

Is there any matter that **has not** been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning **any other subject** that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes _____ No ☒ If yes, please explain:

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes _____

No ☒ Please explain _____

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: 12-18-09

248
Juror Number

Angela M. Morrison
Signature

#278

"Qualified" 3150

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

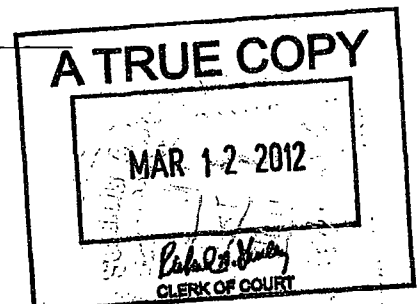
BACKGROUND INFORMATION

1. Full Name: Donna Scott Phelps
Age: 55 Date of Birth 10-4-54
2. Any other names you have used: Donna Gail Phelps
Address: 121 Lactaria Drive
[REDACTED]
3. How long have you lived at your present address? 2 1/2 yrs.
4. Marital Status (please check)
Single _____ Married ☒ Years 26 yrs.
Separated _____ Divorced _____ Years _____
Widowed _____ Never Married _____
Living with someone as a couple _____ Divorced and Remarried _____ years
5. If living with someone as a couple, please state your partner's name: _____
6. Are you a citizen of the United States? Yes ☒ No _____
7. Racial or ethnic group: BLACK

COMMON PLEAS AND
GENERAL SESSIONS

DEC 22 A 8:56

FILED-CLERK'S OFFICE
ANDERSON CO.



EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed

Employed full-time

Employed part-time

Working in the home

Unemployed/laid-off

Retired/student

Disabled/unable to work

2. Name of current employer:

Piedmont Neurosurgical Group

3. What is your present occupation, title or profession?

Surgical Technician

4. Have you held any previous positions with the same employer?

5. Number of years employed as above: 11 yrs.

6. Are you the primary wage earner for your family? Yes: _____ No: ✓

7. Are you salaried or hourly employee? salaried: ✓ hourly: _____

8. Do you rely on overtime pay to meet your monthly household expenses?

Yes: _____ No: ✓

9. Do you supervise other employees? Yes _____ No ✓

10. If YES, how many employees do you supervise? 12

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace? _____

12. Do you have a "second" job? YES (NO)

13. If YES, what is it and where are you employed? _____

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment? General Electric Machinist

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | | |
|---|-----|-----------|
| (a) Hearing problems | Yes | <u>No</u> |
| (b) Seeing problems, even with glasses | Yes | <u>No</u> |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes | <u>No</u> |
| (d) Regular doctor appointments | Yes | <u>No</u> |
| (e) Young children to care for | Yes | <u>No</u> |
| (f) Medical condition affecting attention | Yes | <u>No</u> |
| (g) Difficulty sitting for long periods of time | Yes | <u>No</u> |

If you answered YES to any of these questions, please explain: _____

2. Are you taking medications regularly? Yes ✓ No _____

If yes, please list the medications:

ACTZ

Do any of your medications affect your memory or concentration? Yes _____ No ✓

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes _____ No ✓

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

No

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____
 No ☒

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 55 yr
 2. Other places you have lived and length of time:

3. How long have you lived at your current residence? 2 1/2 yr
 4. Do you own or rent your current residence? Own
 5. Who else lives at your residence?

<u>Name</u>	<u>Relationship</u>
<u>HENRY E Phelps</u>	<u>husband</u>

6. For each of your children (including foster or step-children), please give the following information:

<u>Sex</u>	<u>Age</u>	<u>Occupation/Grade in School/Name of School</u>	<u>Lives at Home</u>
<u>M</u>	<u>25</u>	<u>Credit Analyst</u>	<u>No</u>
<u>F</u>	<u>24</u>	<u>Credit Analyst</u>	<u>No</u>

7. Please give the occupation of the spouses of your married children:

Not Married

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student.

<u>Relationship</u>	<u>Age</u>	<u>Occupational Status</u>

If the person(s) described in No. 8 above is employed, please state for each person:

Name of Individual and Location of Job Title and Duties Previous Jobs

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

Cook, Decorate

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

Anderson Independent

11. Do you frequently follow news reports concerning current events?

Yes ☒ No ☐ If yes, please describe your primary sources of information.

6 o'clock News

12. What television and radio programs do you frequently watch or listen to?

News

13. How often do you watch Court TV or other "true" courtroom show on TV?

None

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☐ No ☒

If so, please explain:

15. What type of books do you read:

Bible or Christian Books

16. What is the last book you read? Bait of Satan

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

No

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

No

19. Have you ever watched all or most of a trial from start to finish? Yes ☐ No ☒

20. Is there any trial that you followed where you disagreed with the verdict?

Yes ☐ No ☒ Explain:

21. Do you use or have access to the Internet? Yes ☒ No ☐

22. If yes, how much time do you spend on the Internet? 10 min. A day

23. For what purpose? Paying Bills

24. What type of Internet sites or blogs do you frequent?

None

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes ☒ No ☐

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes ☒ No ☐

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes ✓ No

28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?** Yes ✓ No

29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?** Yes ✓ No

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? 12 yrs.
2. Please list the schools you have attended and approximate dates you attended each school:
3. Grade School: _____ Dates: _____
4. Junior High School: _____ Dates: _____
5. High School: Westside Graduated 1972
Dates: 1972
6. College: Tai County Tech Dates: 1972-73
7. Vocational or Trade School: _____ Dates: _____
8. Professional School: _____ Dates: _____
9. Graduate School: _____ Dates: _____
10. If you are a student, please describe your area of study: NO
11. If you attended college, vocational or technical school, or graduate school, please list:
12. Your major subject or field of study: Surgical Technicians
13. Any degrees or diplomas which you hold: _____

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply)

Law	Law Enforcement	Psychiatry
Criminal Justice	Criminology	
Sociology	Psychology	
Social Work/Counseling	Forensic Sciences (e.g. serology, fingerprinting, etc.)	
<u>Medicine</u>	<u>Nursing</u>	
Journalism	DNA	
Biology	Chemistry	

If you circled anything in Question 14, please describe:

Surgical Tech School

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? *Dr. Graduate High School Tech School*

16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: _____

17. Have you ever served in the armed forces, or in the National Guard?

Yes ___ No ☒

a. If yes, what branch? _____ Active ___ Reserve ___

b. Highest Rank _____ Dates of service: _____

c. Duties: _____

d. What medals, honors, or commendations did you receive, if any?

e. Did you attend any special schools or receive any special training? Yes ___ No ___ If Yes, please describe: _____

f. Did you serve in combat? Yes ___ No ___

g. Were you drafted or did you voluntarily enlist? Drafted ___ Enlisted ___

h. Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes ___ No ___

i. If yes, please explain (i.e., a court martial or a board of inquiry): _____

16. If any members of your family served or are now serving in the armed forces, for each member please list the following: *No*

Relationship

Branch Rank Achieved

Duties

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes ☒ No ☐
2. What is your religious affiliation, if any? Presbytery
3. What is/was your parents' religious affiliation, if any? Baptist
4. Have you ever changed your religious affiliation? Yes ☒ No ☐
5. If yes, what was your previous affiliation, and why did you change?
Baptist Like the principles of presbytery Governance.
6. Do you attend any religious services? Yes ☒ No ☐
7. If yes, how often do you attend? every Sunday
8. Are you involved with religious activities? Yes ☒ No ☐
9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

Are you an active member in any of these groups? Yes ☐ No ☐

10. If yes, please explain your activities with each group:

11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes ☐ No ☒

If yes, are you an active member? Yes ☐ No ☐

If yes, please list the organizations and explain your activities:

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes _____	No ☒
Mothers Against Drunk Driving	Yes _____	No ☒
Any pro-death penalty group	Yes _____	No ☒
Any anti-death penalty group	Yes _____	No ☒
Parents/Families of Murdered Children	Yes _____	No ☒
Any group that campaigns for stricter criminal penalties	Yes _____	No ☒
Any group that campaigns for more lenient criminal penalties	Yes _____	No ☒
Any group that advocates victims rights	Yes _____	No ☒
Any group that advocates for prisoners' rights	Yes _____	No ☒

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
-----------------------------------	----------------------	---------------------

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes _____
No ☒

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)?
Yes _____ No _____ If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes (☒) No
(b) Your Spouse () Yes (☒) No

If yes, list office. Location and dated of service:

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes ☒ No ☐

If yes, for each occasion, please state:

When Where Civil /Criminal/Court Martial Nature of Case

Civil

Did you deliberate? Yes ☒ No ☐

If yes, what kind of case?

Child Abuse

Was there a verdict?

Were you the Foreperson? Yes ☐ No ☒

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes ☐ No ☒

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis?

Yes ☐ No ☒

If yes, please identify such person and describe his/her relationship to you:

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes ☐ No ☒

If YES, please state the name of the person, their relationship to you, and their current occupation:

Have you ever hired a lawyer for any reason? Yes ☐ No ☒

Please explain:

Have you, a family member or close friend ever been:

- | | | |
|---|-----------|--|
| (a) accused of a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (b) arrested for a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (c) charged with a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (d) convicted of a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (e) investigated for a crime? (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (f) the victim of a crime | Yes _____ | No ☒ |
| (g) a witness to a crime | Yes _____ | No ☒ |

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person:

If you have ever been the victim of a crime, please indicate the following information, if you know it:

Name of perpetrator: _____

Age of perpetrator at time of crime: _____ Your age at time of crime _____

Relationship of the perpetrator to you? _____

Please describe the nature of the offense and any injuries or loss you suffered:

Were there any court proceedings? Yes ___ No ___ Did you attend? Yes ___ No ___

Did you testify? Yes: ___ No: ___

Do you feel you were treated fairly by the justice system?

Please explain:

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it:

What is the relationship of the victim to you? _____

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes _____ No _____

Was the perpetrator caught? Yes _____ No _____

Were there any court proceedings? Yes _____ No _____

Did you attend any of the court proceedings? Yes _____ No _____

Did you testify? Yes _____ No _____

Please describe the nature of the offense and any injuries or loss suffered?

When did you learn of the incident? _____

Do you feel the victim was treated fairly by the justice system?

Please explain. _____

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes _____ No ☒

(a) If the witness was you, please answer the following questions

Describe the crime: _____

Did you report the crime to the police? ____ Yes ____ No

If not, why not? _____

Did you give a statement to the police? Yes ____ No ____

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes ____ No ____

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

(a) any city, county, federal or state prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes ____ No ☒

(b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes ____ No ☒

(c) any city, county, federal or state correctional institution or detention facility? Yes ____ No ☒

(d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes ____ No ☒

(e) any probation department or parole department? Yes ____ No ☒

(f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes ____ No ☒

(g) any other agency or organization connected with the criminal justice system (e.g. ACLU, Citizens for Law and Order, etc.)? Yes ____ No ☒

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

- ☐ the Anderson County Solicitor's Office
- ☐ members of any other district attorney's office
- ☐ members of any Capital Defender's office
- ☐ any criminal defense attorneys
- ☐ any judges, court commissioners, or referees
- ☐ any court personnel (i.e., court reporters, clerks, etc.)
- ☐ any other type of attorneys or paralegals
- ☐ any parole or probation officers
- ☐ any person connected with the criminal justice system in any capacity
- ☐ any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes ☐ No ☒

If yes, please explain. _____

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated].

Have you ever done any of the following:

- (a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes ☐ No ☒
- (b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes ☐ No ☒
- (c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes ☐ No ☒

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes _____ No ☒ ✓
If yes, please explain:

Have you ever known anyone who died as a result of violence? Yes _____ No ☒ ✓

If yes, please explain:

Have you ever been threatened or in fear for your life? Yes _____ No _____

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes _____ No ☒ ✓

Do you, or any member of your family own one or more firearms? Yes _____ No ☒ ✓
If yes, please describe:

What is your opinion about counselors, therapists, psychologists, and psychiatrists?

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way?

*Against the death penalty
People can change or circumstance can make
you react out of emotions*

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

1. I believe that the death penalty is the appropriate form of punishment in all murder cases.
2. I believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
- ③ 3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.
5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way?

*I think nothing happen without God knowing that
maybe his punishment*

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

The same

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes No

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often

About the right amount

Too seldom

Other

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes

No

Regardless of which box you checked, please explain your answer:

Because there is no hope of ever becoming free

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe

No, less severe

Just as severe

Please explain:

Both of them have nothing to look forward to.

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes No

If YES, please explain:

Do you hold to any religious, moral feelings or philosophical principles that would affect your ability to vote for the death penalty as a judgment in this case?

Yes No

Please explain:

Are you affiliated with any organization that advocates in favor of the death penalty?

Yes No

If yes, what organization?

Are you affiliated with any organization that advocates against the death penalty?

Yes No

If yes, what organization?

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

NO

Is there any matter that has not been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning any other subject that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes ___ No ☒ If yes, please explain:

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes ___

No ☒ Please explain _____

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: 12-19-09

Donna Phelps
Signature

278
Juror Number

#307

"Qualified" 168

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

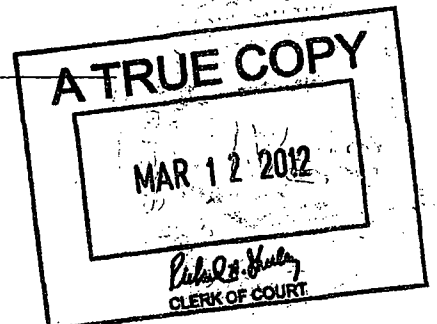
As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

- Full Name: Sandra Lee Sanderson
Age: 60 Date of Birth: [REDACTED]
2. Any other names you have used: Sandra S. Clipp (1971-2007) ^{married}
Address: [REDACTED] 29670
3. How long have you lived at your present address? 4.5 years
4. Marital Status (please check)
Single _____ Married _____ Years _____
Separated _____ Divorced X Years 2.5
Widowed _____ Never Married _____
Living with someone as a couple _____ Divorced and Remarried _____ years
5. If living with someone as a couple, please state your partner's name: _____
6. Are you a citizen of the United States? Yes X No _____
7. Racial or ethnic group: Caucasian/white

FILED-CLERK'S OFFICE
ANDERSON SC
MAR 12 - 6 P 12:07
COMMON PLEAS AND
GENERAL SESSIONS



EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed
Employed full-time
Employed part-time
Working in the home

Unemployed/laid-off
Retired/student
Disabled/unable to work

2. Name of current employer:

3. What is your present occupation, title or profession?

4. Have you held any previous positions with the same employer?

5. Number of years employed as above: 29 yrs. at Clemson University

6. Are you the primary wage earner for your family? Yes: X No:

7. ^{were} Are you salaried or hourly employee? salaried: hourly: X

8. Do you rely on overtime pay to meet your monthly household expenses?
Yes: No:

9. Do you supervise other employees? Yes No

10. If YES, how many employees do you supervise?

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace?

12. Do you have a "second" job? YES NO

13. If YES, what is it and where are you employed?

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

1974 - 1976 BayBank Harvard Trust Co., Cambridge, MA Dept. Supervisor

1977 - 1983 Associate Dir. of Undergraduate Admissions
+ research

2000 - 2009 - Various administrative positions, primarily in Environmental Engineering + Sciences

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment?

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation Management consulting & training, primarily industrial
 b) Place of employment Self employed
 c) Length of employment Since 1981

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | |
|---|---------------|
| (a) Hearing problems | Yes <u>No</u> |
| (b) Seeing problems, even with glasses | Yes <u>No</u> |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes <u>No</u> |
| (d) Regular doctor appointments | Yes <u>No</u> |
| (e) Young children to care for | Yes <u>No</u> |
| (f) Medical condition affecting attention | Yes <u>No</u> |
| (g) Difficulty sitting for long periods of time | Yes <u>No</u> |

If you answered YES to any of these questions, please explain: _____

2. Are you taking medications regularly? Yes X No _____

If yes, please list the medications:

Synthroid + Zoloft daily (low doses on both)

Do any of your medications affect your memory or concentration? Yes _____ No X

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes _____ No X

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

No

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____

No X

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 4.5 years

2. Other places you have lived and length of time:

Clemson 1976 (Dec.) through July 2005

3. How long have you lived at your current residence? 4.5 years

4. Do you own or rent your current residence? OWN

5. Who else lives at your residence? No one

Name

Relationship

6. For each of your children (including foster or step-children), please give the following information:

Sex	Age	Occupation/Grade in School/Name of School	Lives at Home
<u>M</u>	<u>29</u>	<u>PhD student</u>	<u>No</u>
<u>F</u>	<u>27</u>	<u>Attorney</u>	<u>No</u>

7. Please give the occupation of the spouses of your married children:

Daughter-in-law is PhD candidate in Bio-medical Engineering @ NC State Univ.
Son-in-law is a manager for UPS

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student. N/A

Relationship

Age

Occupational Status

If the person(s) described in No. 8 above is employed, please state for each person:

Name of Individual and Location of Job

Title and Duties

Previous Jobs

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

Cook, Travel, garden, read, attend performing arts events

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

Greenville News - Sat + Sunday, National Geographic, Smithsonian Mag, Yankee Magazine

11. Do you frequently follow news reports concerning current events?

Yes X No If yes, please describe your primary sources of information.

WEPR (SC NPR station), Greenville News + Anderson Independent on-line New York Times on line

12. What television and radio programs do you frequently watch or listen to?

I listen to Public Radio throughout the day + Very little TV watching

13. How often do you watch Court TV or other "true" courtroom show on TV?

By chance in someone else's home, perhaps once a year

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes X No

If so, please explain:

I avoid gratuitously violent material and stuff that is "Right Wing".

15. What type of books do you read:

Non fiction, Historical fiction, Biographies, Pop/layman Science, Classic literature

16. What is the last book you read? Holidays on Ice by David Sedaris

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

I've listened to a couple read on The Radio Reader program:
Too Late to Say Goodbye (Ann Rule) Until Proven Innocent by Stuart Taylor

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

No

19. Have you ever watched all or most of a trial from start to finish? Yes _____ No X

20. Is there any trial that you followed where you disagreed with the verdict?

Yes X No _____ Explain: OJ Simpson's trial

21. Do you use or have access to the Internet? Yes X No _____

22. If yes, how much time do you spend on the Internet? 1 hour daily

23. For what purpose? checking weather, act/ theatre calendars, reading on-line news

24. What type of Internet sites or blogs do you frequent?

see above

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes X No _____

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes X No _____

I admit right here that this will be tough for me. I am by nature very inquisitive.

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes X No _____
28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?** Yes X No _____
29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?** Yes X No _____

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? Masters Degree
2. Please list the schools you have attended and approximate dates you attended each school:
3. Grade School: Culbertson Elementary Dates: 1955-1960
4. Junior High School: Woodland School Dates: 1960-64
5. High School: Haddon Heights H.S. Dates: 1964-68
6. College: Douglas College / Rutgers U Dates: 1968-1972
7. Vocational or Trade School: _____ Dates: _____
8. Professional School: _____ Dates: _____
9. Graduate School: Rutgers Univ. School of Library Services Dates: 1972-1973
10. If you are a student, please describe your area of study: _____
11. If you attended college, vocational or technical school, or graduate school, please list:
12. Your major subject or field of study: B.A. in American Studies
13. Any degrees or diplomas which you hold: MLS

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply)

Law	Law Enforcement	Psychiatry
Criminal Justice	Criminology	
<u>Sociology</u> ?	<u>Psychology</u> ?	
Social Work/Counseling	Forensic Sciences (e.g. serology, fingerprinting, etc.)	
Medicine	Nursing	
Journalism	DNA	
Biology	Chemistry	

If you circled anything in Question 14, please describe:

I took one or both of these at Douglass - don't recall

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? _____
16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: _____
17. Have you ever served in the armed forces, or in the National Guard?
- Yes ___ No X
- If yes, what branch? _____ Active ___ Reserve ___
 - Highest Rank _____ Dates of service: _____
 - Duties: _____
 - What medals, honors, or commendations did you receive, if any?
 - Did you attend any special schools or receive any special training? Yes ___ No ___ If Yes, please describe: _____
 - Did you serve in combat? Yes ___ No ___
 - Were you drafted or did you voluntarily enlist? Drafted ___ Enlisted ___
 - Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes ___ No ___
 - If yes, please explain (i.e., a court martial or a board of inquiry): _____

16. If any members of your family served or are now serving in the armed forces, for each member please list the following: _____

<u>Relationship</u>	<u>Branch Rank Achieved</u>	<u>Duties</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes X No
2. What is your religious affiliation, if any? Unitarian Universalist
3. What is/was your parents' religious affiliation, if any? N/A
4. Have you ever changed your religious affiliation? Yes X No
5. If yes, what was your previous affiliation, and why did you change?
I attended Methodist & Presbyterian churches through high school. Discovered
Ullism in College and knew immediately it was a better fit as I could never
subscribe to "salvation through Christ" as the only way
to live a moral and religious life.
6. Do you attend any religious services? Yes X No
7. If yes, how often do you attend? Regularly
8. Are you involved with religious activities? Yes X No
9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:
League of Women Voters, Liberty Hall Village Property Owners Assoc.,
Public Citizen, ACLU, Amnesty International

Are you an active member in any of these groups? Yes X No

10. If yes, please explain your activities with each group:

LHVPOA - I am Treasurer / Board Member

11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes X No

If yes, are you an active member? Yes No X

If yes, please list the organizations and explain your activities:

League of WV, Public Citizen, ACLU, Amnesty Int'l

I donate & read their materials. Occasionally

I send emails to congressmen supporting positions or specific legislation.

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes ☒	No ☐
Mothers Against Drunk Driving	Yes ☒	No ☐
Any pro-death penalty group	Yes ☐	No ☒
Any anti-death penalty group	Yes ☐	No ☒
Parents/Families of Murdered Children	Yes ☐	No ☒
Any group that campaigns for stricter criminal penalties	Yes ☐	No ☒
Any group that campaigns for more lenient criminal penalties	Yes ☒	No ☐
Any group that advocates victims rights	Yes ☐	No ☒
Any group that advocates for prisoners' rights	Yes ☒	No ☐

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
Self	Neighborhood Watch	Attended one neighborhood meeting
Self	MADD	Donated regularly in the past
Self	UW Association + UW Service Comm	Read material + support w/ membership

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes ☐ No ☒

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)? Yes ☐ No ☒ If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes (☒) No
 (b) Your Spouse () Yes () No

If yes, list office. Location and dated of service:

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes X No _____ One case on underage drinking @ Clemson Univ. Magistrate Court. Called once to serve in City of Clemson Court, but
If yes, for each occasion, please state: Case was dismissed or settled.

When Where Civil/Criminal/Court Martial Nature of Case

See notes above Both cases were more than 10 years ago.

Did you deliberate? Yes X No _____

If yes, what kind of case? Jury of five @ Clemson Univ.

Was there a verdict? Yes

Were you the Foreperson? Yes _____ No _____ Don't remember. Probably not.

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes _____ No X

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis? Yes X No _____

If yes, please identify such person and describe his/her relationship to you:

→ Lauren Clipp Giles - attorney - daughter
Kay K. Barrett - attorney - long time personal friend

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes X No _____

If YES, please state the name of the person, their relationship to you, and their current occupation:

*

Have you ever hired a lawyer for any reason? Yes X No _____

Please explain: Scott Dover represented me in divorce proceedings
Pickens County 2005-2007

Have you, a family member or close friend ever been:

- (a) accused of a crime (more serious than a speeding ticket) Yes _____ No X
 (b) arrested for a crime (more serious than a speeding ticket) Yes _____ No X
 (c) charged with a crime (more serious than a speeding ticket) Yes _____ No X
 (d) convicted of a crime (more serious than a speeding ticket) Yes _____ No X
 (e) investigated for a crime? (more serious than a speeding ticket) Yes _____ No X
 (f) the victim of a crime Yes _____ No X
 (g) a witness to a crime Yes _____ No X

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person:

If you have ever been the victim of a crime, please indicate the following information, if you know it:

Name of perpetrator: Don't recall

Age of perpetrator at time of crime: 19-20 Your age at time of crime 19-20

Relationship of the perpetrator to you? Another student @ Douglass College

Please describe the nature of the offense and any injuries or loss you suffered:

Assault + Battery. Grabbed by the hair + thrown around a bit in the college dining hall when I challenged her (verbally) about "cutting in" the cafeteria line.

Where were any court proceedings? Yes X No _____ Did you attend? Yes X No _____

Did you testify? Yes: X No: _____

Do you feel you were treated fairly by the justice system? Yes. The judge found her guilty

Please explain:

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it:

What is the relationship of the victim to you? _____

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes _____ No _____

Was the perpetrator caught? Yes _____ No _____

Were there any court proceedings? Yes _____ No _____

Did you attend any of the court proceedings? Yes _____ No _____

Did you testify? Yes _____ No _____

Please describe the nature of the offense and any injuries or loss suffered?

When did you learn of the incident? _____

Do you feel the victim was treated fairly by the justice system?

Please explain. _____

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes _____ No X

(a) If the witness was you, please answer the following questions

Describe the crime: _____

Did you report the crime to the police? Yes _____ No _____

If not, why not? _____

Did you give a statement to the police? Yes _____ No _____

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes _____ No _____

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

(a) any city, county, federal or state prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes _____ No X

(b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes _____ No X

(c) any city, county, federal or state correctional institution or detention facility? Yes _____ No X

(d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes _____ No X

(e) any probation department or parole department? Yes _____ No X

(f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes _____ No X

(g) any other agency or organization connected with the criminal justice system (e.g. ACLU, Citizens for Law and Order, etc.)? Yes _____ No X

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

- _____ the Anderson County Solicitor's Office
- _____ members of any other district attorney's office
- _____ members of any Capital Defender's office
- _____ any criminal defense attorneys
- ☒ any judges, court commissioners, or referees
- _____ any court personnel (i.e., court reporters, clerks, etc.)
- _____ any other type of attorneys or paralegals
- _____ any parole or probation officers
- _____ any person connected with the criminal justice system in any capacity
- ☒ any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Daughter was a clerk in the Circuit Court of Barrow-Banks + Jackson Counties in Georgia for one year 2008-2009. Son-in-law's brother is an officer in the Greenville County Sheriff's Dept.

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes ☒ No _____

If yes, please explain. My limited exposure has led me to believe the system works pretty well most of the time.

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated].

Daughter visited ^{fathered} the Pickens County Detention Center once many years ago as part of a school group.

Have you ever done any of the following:

(a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes

_____ No ☒

(b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes _____ No ☒

(c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes _____ No ☒

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes ☒ No ☐

If yes, please explain:

Divorce hearing before Judge Alvin Johnson in 2007

Have you ever known anyone who died as a result of violence? Yes ☐ No ☒

If yes, please explain:

Have you ever been threatened or in fear for your life? Yes ☐ No ☒

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes ☐ No ☒

Do you, or any member of your family own one or more firearms? Yes ☐ No ☒

If yes, please describe:

What is your opinion about counselors, therapists, psychologists, and psychiatrists?

They can be very helpful.

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way?

I am opposed generally, but do not feel strongly enough about it to actively oppose the death penalty. I believe it is totally worthless as a deterrent and is a horror when mis-applied.

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

1. I believe that the death penalty is the appropriate form of punishment in all murder cases.
2. I believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.
5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way?

I prefer this sentence over the death penalty.

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

N/a

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes ___ No X

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often

About the right amount

Too seldom

Other Unevenly & for political reasons of DAs.

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes X No _____

Regardless of which box you checked, please explain your answer:

I can't think of anything worse than waking up every morning knowing that you will be confined that day as well as all the rest of your days for a heinous act you committed and were found guilty of committing.

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe

No, less severe

Just as severe

Please explain:

see above.

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes _____ No X

If YES, please explain: _____

Do you hold to any religious, moral feelings or philosophical principles that would affect your ability to vote for the death penalty as a judgment in this case?

Yes X ^{and} No X Please explain: I do not like the death penalty, but as a jurist my role would be to carry out the laws that exist on the books

Are you affiliated with any organization that advocates in favor of the death penalty?

Yes _____ No X

If yes, what organization? _____

Are you affiliated with any organization that advocates against the death penalty?

Yes X No _____

If yes, what organization? Unitarian Universalist Association

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

Is there any matter that has not been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning any other subject that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes ___ No X If yes, please explain:

With respect to life sentences, I believe that prisoners should be given routine medical + dental care and treatment for acute disease or trauma. No treatment, other than palliative care, should be extended for terminal illnesses - a waste of resources.

I also believe that someone w/a life sentence should be able to request an

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes ___ execution -

No X Please explain what case? assuming a sound mental state + lots of safeguards against abuse by prison officials.

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: Jan. 5, 2010

307
Juror Number

Vandria Lee Vanderson
Signature

#383

"Qualified" 3186

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

1. Full Name: BERNARD L. WILLIAMS

Age: 26 Date of Birth: [REDACTED]

2. Any other names you have used: NO

Address: [REDACTED]

3. How long have you lived at your present address? _____

4. Marital Status (please check)

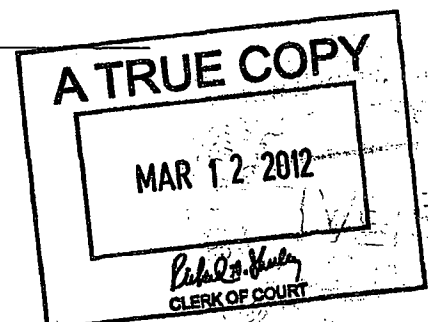
Single ☒ Married _____ Years _____
Separated _____ Divorced _____ Years _____
Widowed _____ Never Married _____
Living with someone as a couple _____ Divorced and Remarried _____ years

5. If living with someone as a couple, please state your partner's name: _____

6. Are you a citizen of the United States? Yes ☒ No _____

7. Racial or ethnic group: _____

CLERK OF COURT'S OFFICE
MAR 13 11:54
GENERAL SESSIONS



EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed

Employed full-time

Employed part-time

Working in the home

Unemployed/laid-off

Retired/student

Disabled/unable to work

2. Name of current employer:

ELETROLUX

3. What is your present occupation, title or profession?

MACHINE OPERATOR

4. Have you held any previous positions with the same employer?

YES

5. Number of years employed as above: 6

6. Are you the primary wage earner for your family? Yes: ___ No: ___

7. Are you salaried or hourly employee? salaried: ___ hourly: ☒

8. Do you rely on overtime pay to meet your monthly household expenses?
Yes: ___ No: ___

9. Do you supervise other employees? Yes ___ No ☒

10. If YES, how many employees do you supervise? NONE

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace? 1600

12. Do you have a "second" job? YES NO

13. If YES, what is it and where are you employed? _____

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

SONIC, MCDONALDS, TACO BELL

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment? _____

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | | |
|---|-----|-----------|
| (a) Hearing problems | Yes | <u>No</u> |
| (b) Seeing problems, even with glasses | Yes | <u>No</u> |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes | <u>No</u> |
| (d) Regular doctor appointments | Yes | <u>No</u> |
| (e) Young children to care for | Yes | <u>No</u> |
| (f) Medical condition affecting attention | Yes | <u>No</u> |
| (g) Difficulty sitting for long periods of time | Yes | <u>No</u> |

If you answered YES to any of these questions, please explain: _____

2. Are you taking medications regularly? Yes _____ No ✓

If yes, please list the medications:

Do any of your medications affect your memory or concentration? Yes _____ No _____

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes _____ No ✓

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

No

6. Do you have any difficulty reading, speaking or understanding the English language? Yes ☒ No ☐

No ☐

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 24 yrs

2. Other places you have lived and length of time:

GA 2 yrs

3. How long have you lived at your current residence? 9 yrs

4. Do you own or rent your current residence? rent

5. Who else lives at your residence?

Name

Relationship

Mary Jones

Aunt

6. For each of your children (including foster or step-children), please give the following information:

<u>Sex</u>	<u>Age</u>	<u>Occupation/Grade in School/Name of School</u>	<u>Lives at Home</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

7. Please give the occupation of the spouses of your married children:

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student.

Relationship

Age

Occupational Status

If the person(s) described in No. 8 above is employed, please state for each person: *no*

Name of Individual and Location of Job Title and Duties Previous Jobs

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

Basketball

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

11. Do you frequently follow news reports concerning current events?

Yes ☒ No ☐ If yes, please describe your primary sources of information.

12. What television and radio programs do you frequently watch or listen to?

13. How often do you watch Court TV or other "true" courtroom show on TV? *a lot*

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☐ No ☒

If so, please explain:

15. What type of books do you read:

16. What is the last book you read? _____

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

19. Have you ever watched all or most of a trial from start to finish? Yes _____ No ✓

20. Is there any trial that you followed where you disagreed with the verdict?

Yes _____ No ✓ Explain:

21. Do you use or have access to the Internet? Yes ✓ No _____

22. If yes, how much time do you spend on the Internet? _____

23. For what purpose? various reason

24. What type of Internet sites or blogs do you frequent?

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes ✓ No _____

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes ✓ No _____

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes No
28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?** Yes No
29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?** Yes No

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? 12th
2. Please list the schools you have attended and approximate dates you attended each school:
3. Grade School: _____ Dates: _____
4. Junior High School: _____ Dates: _____
5. High School: Westside High Dates: 2003
6. College: _____ Dates: _____
7. Vocational or Trade School: _____ Dates: _____
8. Professional School: _____ Dates: _____
9. Graduate School: _____ Dates: _____
10. If you are a student, please describe your area of study: _____
11. If you attended college, vocational or technical school, or graduate school, please list:
12. Your major subject or field of study: _____
13. Any degrees or diplomas which you hold: _____

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply)

Law	Law Enforcement	Psychiatry
Criminal Justice	Criminology	
Sociology	Psychology	
Social Work/Counseling	Forensic Sciences (e.g. serology, fingerprinting, etc.)	
Medicine	Nursing	
Journalism	DNA	
Biology	Chemistry	

If you circled anything in Question 14, please describe:

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? _____

16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: _____

17. Have you ever served in the armed forces, or in the National Guard?

Yes ___ No ___

a. If yes, what branch? _____ Active ___ Reserve ___

b. Highest Rank _____ Dates of service: _____

c. Duties: _____

d. What medals, honors, or commendations did you receive, if any?

e. Did you attend any special schools or receive any special training? Yes ___ No ___ If Yes, please describe:

f. Did you serve in combat? Yes ___ No ___

g. Were you drafted or did you voluntarily enlist? Drafted ___ Enlisted ___

h. Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes ___ No ___

i. If yes, please explain (i.e., a court martial or a board of inquiry):

16. If any members of your family served or are now serving in the armed forces, for each member please list the following:

<u>Relationship</u>	<u>Branch Rank Achieved</u>	<u>Duties</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes ☒ No ☐
2. What is your religious affiliation, if any? Baptist
3. What is/was your parents' religious affiliation, if any? same
4. Have you ever changed your religious affiliation? Yes ☐ No ☒
5. If yes, what was your previous affiliation, and why did you change?

-
6. Do you attend any religious services? Yes ☐ No ☐
 7. If yes, how often do you attend? _____
 8. Are you involved with religious activities? Yes ☐ No ☐
 9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

Are you an active member in any of these groups? Yes ☐ No ☐

10. If yes, please explain your activities with each group:

-
-
-
11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes ☐ No ☒

If yes, are you an active member? Yes ☐ No ☐

If yes, please list the organizations and explain your activities:

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes _____	No _____
Mothers Against Drunk Driving	Yes _____	No _____
Any pro-death penalty group	Yes _____	No _____
Any anti-death penalty group	Yes _____	No _____
Parents/Families of Murdered Children	Yes _____	No _____
Any group that campaigns for stricter criminal penalties	Yes _____	No _____
Any group that campaigns for more lenient criminal penalties	Yes _____	No _____
Any group that advocates victims rights	Yes _____	No _____
Any group that advocates for prisoners' rights	Yes _____	No _____

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
-----------------------------------	----------------------	---------------------

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes _____
No _____

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)?
Yes _____ No _____ If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes () No
(b) Your Spouse () Yes () No

If yes, list office. Location and dated of service:

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes _____ No

If yes, for each occasion, please state:

<u>When</u>	<u>Where</u>	<u>Civil/Criminal/Court Martial</u>	<u>Nature of Case</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Did you deliberate? Yes _____ No _____

If yes, what kind of case? _____

Was there a verdict?

Were you the Foreperson? Yes _____ No _____

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes _____ No _____

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis?

Yes _____ No _____

If yes, please identify such person and describe his/her relationship to you:

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes _____ No _____

If YES, please state the name of the person, their relationship to you, and their current occupation:

Have you ever hired a lawyer for any reason? Yes _____ No

Please explain:

Have you, a family member or close friend ever been:

- (a) accused of a crime (more serious than a speeding ticket) Yes _____ No ☒
- (b) arrested for a crime (more serious than a speeding ticket) Yes _____ No ☒
- (c) charged with a crime (more serious than a speeding ticket) Yes _____ No ☒
- (d) convicted of a crime (more serious than a speeding ticket) Yes _____ No ☒
- (e) investigated for a crime? (more serious than a speeding ticket) Yes _____ No ☒
- (f) the victim of a crime Yes _____ No ☒
- (g) a witness to a crime Yes _____ No ☒

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person:

If you have ever been the victim of a crime, please indicate the following information, if you know it:

Name of perpetrator: _____

Age of perpetrator at time of crime: _____ Your age at time of crime _____

Relationship of the perpetrator to you? _____

Please describe the nature of the offense and any injuries or loss you suffered:

Where there any court proceedings? Yes _____ No _____ Did you attend? Yes _____ No _____

Did you testify? Yes: _____ No: _____

Do you feel you were treated fairly by the justice system?

Please explain:

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it:

What is the relationship of the victim to you? _____

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes _____ No _____

Was the perpetrator caught? Yes _____ No _____

Were there any court proceedings? Yes _____ No _____

Did you attend any of the court proceedings? Yes _____ No _____

Did you testify? Yes _____ No _____

Please describe the nature of the offense and any injuries or loss suffered?

When did you learn of the incident? _____

Do you feel the victim was treated fairly by the justice system?

Please explain. _____

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes _____ No _____

(a) If the witness was you, please answer the following questions

Describe the crime: _____

Did you report the crime to the police? Yes _____ No _____

If not, why not? _____

Did you give a statement to the police? Yes _____ No _____

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes _____ No _____

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

- (a) any city, county, federal or state prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes _____ No ☒
- (b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes _____ No ☒
- (c) any city, county, federal or state correctional institution or detention facility? Yes _____ No _____
- (d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes _____ No ☒
- (e) any probation department or parole department? Yes _____ No ☒
- (f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes _____ No ☒
- (g) any other agency or organization connected with the criminal justice system (e.g. ACLU, Citizens for Law and Order, etc.)? Yes _____ No ☒

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

- ☐ the Anderson County Solicitor's Office
- ☐ members of any other district attorney's office
- ☐ members of any Capital Defender's office
- ☐ any criminal defense attorneys
- ☐ any judges, court commissioners, or referees
- ☐ any court personnel (i.e., court reporters, clerks, etc.)
- ☐ any other type of attorneys or paralegals
- ☐ any parole or probation officers
- ☐ any person connected with the criminal justice system in any capacity
- ☐ any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes ☐ No ☒

If yes, please explain.

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated].

Have you ever done any of the following:

- (a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes ☐ No ☒
- (b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes ☐ No ☒
- (c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes ☐ No ☒

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes ____ No /
If yes, please explain:

Have you ever known anyone who died as a result of violence? Yes ____ No ____

If yes, please explain:

Have you ever been threatened or in fear for your life? Yes ____ No ____

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes ____ No ____

Do you, or any member of your family own one or more firearms? Yes ____ No ____
If yes, please describe:

What is your opinion about counselors, therapists, psychologists, and psychiatrists?

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way?

Don't believe in it

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

1. I believe that the death penalty is the appropriate form of punishment in all murder cases.
2. I believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.
5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way?

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes _____ No _____

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often About the right amount Too seldom Other _____

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes _____ No

Regardless of which box you checked, please explain your answer:

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe No, less severe Just as severe

Please explain:

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes _____ No _____

If YES, please explain: _____

Do you hold to any **religious, moral feelings or philosophical principles** that would affect your ability to vote for the death penalty as a judgment in this case?

Yes _____ No Please explain: _____

Are you affiliated with any organization that advocates **in favor** of the death penalty?

Yes _____ No _____

If yes, what organization? _____

Are you affiliated with any organization that advocates **against** the death penalty?

Yes _____ No _____

If yes, what organization? _____

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

Is there any matter that has not been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning **any other subject** that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes ____ No ____ If yes, please explain:

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes ____

No ____ Please explain _____

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: _____

Signature

Juror Number

"Qualified" (#386) 3:30 8204

THE PRESIDING JUDGE REQUIRES THAT YOU ANSWER
TO THE BEST OF YOUR KNOWLEDGE THE FOLLOWING QUESTIONS
AND RETURN THEM ALONG WITH THE JUROR QUESTIONNAIRE CARD
(FORM)
WITHIN FIVE (5) DAYS

JUROR QUESTIONNAIRE
PLEASE PRINT YOUR ANSWERS.

To Prospective Jurors:

Please answer all of the questions as completely and honestly as you can. You may be questioned in Court, but your answers to these questions entered herein will speed the process.

Please do not assume anything from these questions. The fact that any one or all of them are being asked does not necessarily have anything to do with the evidence you will hear.

As you answer the questions, please keep in mind that there are no "right" or "wrong" answers.

Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

BACKGROUND INFORMATION

1. Full Name: Glennie Dominique Williams

Age: 24 Date of Birth: [REDACTED]

2. Any other names you have used: _____

Address: [REDACTED]

3. How long have you lived at your present address? 1 yrs

4. Marital Status (please check)

Single ☒

Married _____ Years _____

Separated _____

Divorced _____ Years _____

Widowed _____

Never Married _____

Living with someone as a couple _____ Divorced and Remarried _____ years

5. If living with someone as a couple, please state your partner's name: _____

6. Are you a citizen of the United States? Yes ☒ No _____

7. Racial or ethnic group: Black

A TRUE COPY

MAR 12 2012

[Signature]
CLERK OF COURT

EMPLOYMENT

1. Are you (circle all that apply)?

Self-employed
~~Employed full-time~~
 Employed part-time
 Working in the home

Unemployed/laid-off
 Retired/student
 Disabled/unable to work

2. Name of current employer:

Wendy's

3. What is your present occupation, title or profession?

Cashier

4. Have you held any previous positions with the same employer?

No

5. Number of years employed as above: 2 yrs

6. Are you the primary wage earner for your family? Yes: ☒ No: ☐

7. Are you salaried or hourly employee? salaried: ☐ hourly: ☒

8. Do you rely on overtime pay to meet your monthly household expenses?
 Yes: ☐ No: ☒

9. Do you supervise other employees? Yes ☐ No ☒

10. If YES, how many employees do you supervise? _____

If YES, do you have occasion to fire or discipline other employees? Please explain:

11. Approximately how many people are there at your workplace? 16 or more

12. Do you have a "second" job? YES ☐ NO ☒

13. If YES, what is it and where are you employed? _____

14. Please list any other significant employment experiences you have had throughout your life. If you are not currently employed, or if you have been employed at your present place of employment for less than 2 years, please provide the name of your previous employer, your job title, and the dates you worked.

Taco Bell - Cashier, Cook, was there for
five years.

15. If married or living as a couple, what is your spouse's or partner's present occupation and place of employment? _____

16. If you are divorced/separated or widowed, please give your prior spouse's occupation, place of employment, and length of employment:

- a) Occupation _____
- b) Place of employment _____
- c) Length of employment _____

ABILITY TO SERVE AS A JUROR: HARDSHIPS LIMITATIONS:

1. Do you have any of the following? (Please circle one)

- | | | |
|---|-----|-------------------------------------|
| (a) Hearing problems | Yes | ☒ No |
| (b) Seeing problems, even with glasses | Yes | ☒ No |
| (c) Someone who is sick or disabled, for whom you are a primary caregiver | Yes | ☒ No |
| (d) Regular doctor appointments | Yes | ☒ No |
| (e) Young children to care for | Yes | ☒ No |
| (f) Medical condition affecting attention | Yes | ☒ No |
| (g) Difficulty sitting for long periods of time | Yes | ☒ No |

If you answered YES to any of these questions, please explain: _____

2. Are you taking medications regularly? Yes _____ No ☒

If yes, please list the medications:

Do any of your medications affect your memory or concentration? Yes _____ No ☒

If YES, please explain:

3. Do you have any mental or emotional problems that would make it difficult for you to serve on a jury? Yes _____ No ☒

If YES, please explain:

4. Do you have any personal hardships as to why you cannot serve as a juror?

☒ _____

6. Do you have any difficulty reading, speaking or understanding the English language? Yes _____

No ☒ _____

RESIDENCE/CHILDREN

1. How long have you lived in Anderson County? 24 years
2. Other places you have lived and length of time:
- _____
- _____

3. How long have you lived at your current residence? 1 year
4. Do you own or rent your current residence? Rent
5. Who else lives at your residence?

<u>Name</u>	<u>Relationship</u>
<u>Ab'niyah Moore</u>	<u>Child</u>
_____	_____
_____	_____

6. For each of your children (including foster or step-children), please give the following information:

<u>Sex</u>	<u>Age</u>	<u>Occupation/Grade in School/Name of School</u>	<u>Lives at Home</u>
<u>F</u>	<u>8</u>	<u>Calhoun Academy of Arts - 2nd grade</u>	<u>yes</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

7. Please give the occupation of the spouses of your married children:
- _____
- _____
- _____

8. If there are any other adults, other than your spouse/partner, living in your home please state their occupation. If they are not presently employed, please state if they are: a) homemaker; b) unemployed; c) retired; d) disabled; e) student.

<u>Relationship</u>	<u>Age</u>	<u>Occupational Status</u>
_____	_____	_____
_____	_____	_____

If the person(s) described in No. 8 above is employed, please state for each person:

Name of Individual and Location of Job Title and Duties Previous Jobs

9. What do you like to do in your spare time (i.e., hobbies, sports, interests, movies, books, etc.)?

I like to read Books, and go Skating with my daughter.

10. What newspapers, magazines, and periodicals do you subscribe to or regularly read?

The Independent news of Anderson

11. Do you frequently follow news reports concerning current events?

Yes _____ No ☒ If yes, please describe your primary sources of information.

12. What television and radio programs do you frequently watch or listen to?

I really don't watch to much tv, and I listen to 107.3 Jamz

13. How often do you watch Court TV or other "true" courtroom show on TV? Rare

14. Is there any subject matter or genre in reading materials, television programs or movies that you try to avoid?

Yes ☒ No _____

If so, please explain:

Movies and programs with alot of Violence in it.

15. What type of books do you read:

Zane, Eric Jerome Dickey, pastor T.D jakes and many more

16. What is the last book you read? was a book by Zane forgot the title

17. Do you ever read "true crime books? If so, please list the titles or subjects of those you remember reading or hearing about within the last several years?

Ø

18. Is there any criminal case you have followed closely in the media because it touched your family or caught your interest?

Ø

19. Have you ever watched all or most of a trial from start to finish? Yes ☒ No ☐

20. Is there any trial that you followed where you disagreed with the verdict?

Yes ☐ No ☒ Explain:

21. Do you use or have access to the Internet? Yes ☐ No ☒

22. If yes, how much time do you spend on the Internet? _____

23. For what purpose? _____

24. What type of Internet sites or blogs do you frequent?

25. Will you accept without reservation, the Court's order that **YOU WILL NOT ACCESS OR USE THE INTERNET TO GATHER ANY INFORMATION OF ANY KIND REGARDING THIS TRIAL?**

Yes ☒ No ☐

26. Would you also follow, without reservation, the Court's order that **YOU MUST NOT INDEPENDENTLY INVESTIGATE THE FACTS OR THE LAW. YOU MUST NOT CONSIDER OR DISCUSS FACTS AS TO WHICH THERE IS NO EVIDENCE. THIS MEANS, FOR EXAMPLE, THAT YOU MUST NOT ON YOUR OWN VISIT THE SCENE, CONDUCT EXPERIMENTS, OR CONSULT REFERENCES, WORKS, OR PERSONS FOR ADDITIONAL INFORMATION REGARDING ANY SUBJECT OF THIS TRIAL?**

Yes ☒ No ☐

27. Would you also follow, without reservation, the Court's order that **YOU MUST NOT CONVERSE WITH OTHER PROSPECTIVE JURORS, OR WITH ANYONE ELSE, ON ANY SUBJECT CONNECTED WITH THE TRIAL?** Yes ☒ No ☐
28. Would you also follow, without reservation, the Court's order that **YOU MUST NOT READ OR LISTEN TO ANY ACCOUNTS OR DISCUSSIONS OF THE CASE REPORTED BY THE NEWSPAPERS OR OTHER NEWS MEDIA, INCLUDING RADIO AND TELEVISION?** Yes ☒ No ☐
29. Would you also follow, without reservation, the Court's order that **YOU MUST NOT VISIT OR VIEW THE PREMISES OR PLACE WHERE THE CRIME OR CRIMES WERE ALLEGEDLY COMMITTED, OR ANY OTHER PREMISES OR PLACE MENTIONED OR INVOLVED IN THE CASE?** Yes ☒ No ☐

EDUCATION/MILITARY

1. What is the highest level of education that you have completed? (11) went back and got a diploma
2. Please list the schools you have attended and approximate dates you attended each school:
3. Grade School: Starr Elementary Dates: _____
4. Junior High School: Starr Iva Dates: 9
5. High School: Crescent Dates: 9
6. College: Tri County tech of pendleton Dates: 9-24-09
7. Vocational or Trade School: _____ Dates: _____
8. Professional School: _____ Dates: _____
9. Graduate School: _____ Dates: _____
10. If you are a student, please describe your area of study: _____
11. If you attended college, vocational or technical school, or graduate school, please list:
12. Your major subject or field of study: _____
13. Any degrees or diplomas which you hold: High School diploma

14. Have you ever taken courses or received any training in any of the following subjects? (Circle all that apply) N 6

Law	Law Enforcement	Psychiatry
Criminal Justice	Criminology	
Sociology	Psychology	
Social Work/Counseling	Forensic Sciences (e.g. serology, fingerprinting, etc.)	
Medicine	Nursing	
Journalism	DNA	
Biology	Chemistry	

If you circled anything in Question 14, please describe:

15. If married or living in a couple, what is the highest level of your spouse's or partner's education? _____
16. If your spouse or partner has ever taken courses, or received training, in any of the areas listed in question 14, please describe: _____

17. Have you ever served in the armed forces, or in the National Guard?

Yes _____ No ✓

- a. If yes, what branch? _____ Active _____ Reserve _____
- b. Highest Rank _____ Dates of service: _____
- c. Duties: _____
- d. What medals, honors, or commendations did you receive, if any?
- e. Did you attend any special schools or receive any special training? Yes _____ No ✓ If Yes, please describe:
- f. Did you serve in combat? Yes _____ No ✓
- g. Were you drafted or did you voluntarily enlist? Drafted _____ Enlisted _____
- h. Did you ever serve in the capacity of police officer, corrections officer, court martial officer, or investigating officer, or participate in a court martial or other judicial or disciplinary proceeding while in the military? Yes _____ No ✓
- i. If yes, please explain (i.e., a court martial or a board of inquiry):

16. If any members of your family served or are now serving in the armed forces, for each member please list the following:

<u>Relationship</u>	<u>Branch Rank Achieved</u>	<u>Duties</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

POLITICAL, RELIGIOUS, AND OTHER ORGANIZATIONAL AFFILIATIONS

1. Are you registered to vote? Yes ☒ No ☐
2. What is your religious affiliation, if any? Baptist
3. What is/was your parents' religious affiliation, if any? _____
4. Have you ever changed your religious affiliation? Yes _____ No ☒
5. If yes, what was your previous affiliation, and why did you change?

6. Do you attend any religious services? Yes ☒ No ☐
7. If yes, how often do you attend? once a month
8. Are you involved with religious activities? Yes _____ No ☒
9. Please list any civic, political, social, professional, neighborhood, or charitable organizations, including unions or clubs you are affiliated with, belong to or have donated money to:

Are you an active member in any of these groups? Yes _____ No ☒

10. If yes, please explain your activities with each group:

11. Do you or any members of your immediate family or household belong to or have an affiliation with any special interest groups (i.e., Mothers Against Drunk Driving, Crime Watch, National Rifle Association, ACLU, Prisoner's Rights Groups, etc.)?

Yes _____ No ☒

If yes, are you an active member? Yes _____ No ☒

If yes, please list the organizations and explain your activities:

12. Have you, any member of your immediate household, family or friend, ever belonged to, been affiliated with or donated money to any group involved in law enforcement or monitoring of the courts, such as:

Neighborhood Watch	Yes _____	No ☒
Mothers Against Drunk Driving	Yes _____	No ☒
Any pro-death penalty group	Yes _____	No ☒
Any anti-death penalty group	Yes _____	No ☒
Parents/Families of Murdered Children	Yes _____	No ☒
Any group that campaigns for stricter criminal penalties	Yes _____	No ☒
Any group that campaigns for more lenient criminal penalties	Yes _____	No ☒
Any group that advocates victims rights	Yes _____	No ☒
Any group that advocates for prisoners' rights	Yes _____	No ☒

13. If the answer to any of these questions is "yes", please indicate who the individual was that was involved with the group, their relationship to you, the nature of their involvement, and what the name of the group was:

Relationship to you, or "self"	Name of organization	Type of involvement
-----------------------------------	----------------------	---------------------

14. Have you ever called to a news show, written a letter to a newspaper, or participated in an online discussion about criminal justice issues, life sentences, parole, or the death penalty? Yes _____
No ☒

If yes, please describe:

15. Do you have any bumper stickers or personalized license plates or holders on your car(s)?
Yes _____ No ☒ If yes, please describe them:

16. Have you or your spouse ever been elected or appointed to Public Office?

(a) You: () Yes (☒) No
(b) Your Spouse () Yes () No

If yes, list office. Location and dated of service:

CRIMINAL JUSTICE SYSTEM

Do you have any previous experience as a juror? This would include experience on a civil jury, a criminal jury, a court martial, or a grand jury.

Yes _____ No ☒

If yes, for each occasion, please state:

<u>When</u>	<u>Where</u>	<u>Civil /Criminal/Court Martial</u>	<u>Nature of Case</u>
-------------	--------------	--------------------------------------	-----------------------

Did you deliberate? Yes _____ No _____

If yes, what kind of case? _____

Was there a verdict?

Were you the Foreperson? Yes _____ No _____

Have you ever been, or are you now, a lawyer, judge, or paralegal, or have you ever attended law school or paralegal school? Yes _____ No ☒

Do you know any lawyers, judges, or prosecutors on a personal, professional, or casual basis?

Yes _____ No ☒

If yes, please identify such person and describe his/her relationship to you:

Has any member of your family ever been a lawyer, judge, or paralegal, or have any of them ever attended law school or paralegal school? Yes _____ No ☒

If YES, please state the name of the person, their relationship to you, and their current occupation:

Have you ever hired a lawyer for any reason? Yes _____ No ☒

Please explain:

Have you, a family member or close friend ever been:

- | | | |
|---|-----------|--|
| (a) accused of a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (b) arrested for a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (c) charged with a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (d) convicted of a crime (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (e) investigated for a crime? (more serious than a speeding ticket) | Yes _____ | No ☒ |
| (f) the victim of a crime | Yes _____ | No ☒ |
| (g) a witness to a crime | Yes _____ | No ☒ |

If you, a family member, or close friend has been accused of a crime, arrested for a crime, charged with a crime, convicted of a crime, or investigated for a crime, please provide the following information: Who was involved? What is their relationship to you? Describe the crime, and what happened to the person:

If you have ever been the victim of a crime, please indicate the following information, if you know it:

Name of perpetrator: _____

Age of perpetrator at time of crime: _____ Your age at time of crime _____

Relationship of the perpetrator to you? _____

Please describe the nature of the offense and any injuries or loss you suffered:

Where were there any court proceedings? Yes _____ No _____ Did you attend? Yes _____ No _____

Did you testify? Yes: _____ No: _____

Do you feel you were treated fairly by the justice system?

Please explain:

If a family member or close friend, ever been a victim of a crime, please give the following information if you know it:

What is the relationship of the victim to you? _____

How old was the perpetrator at the time of the incident? _____

What was the age of the victim at the time of the incident? _____

Did the victim know the perpetrator? Yes _____ No _____

Was the perpetrator caught? Yes _____ No _____

Were there any court proceedings? Yes _____ No _____

Did you attend any of the court proceedings? Yes _____ No _____

Did you testify? Yes _____ No _____

Please describe the nature of the offense and any injuries or loss suffered?

Ø

When did you learn of the incident? _____

Do you feel the victim was treated fairly by the justice system?

Please explain. _____

Have you, any member of your immediate family, household, or a close friend ever been a witness to a crime (not already mentioned above)? Yes _____ No ☒

(a) If the witness was you, please answer the following questions

Describe the crime: _____

Did you report the crime to the police? Yes _____ No _____

If not, why not? _____

Did you give a statement to the police? Yes _____ No _____

Did you have to make any type of identification of the suspect (i.e., view pictures of suspects or attend a lineup, etc.)? Yes _____ No _____

If yes, please describe:

(b) If the witness was a member of your family, household or a close friend, please describe who the person was and the nature of their involvement:

Have you or any member of your family or household, or close friend ever been employed by, sought employment with, volunteer, or are currently employed by any of the following:

(a) any city, county, federal or state prosecutorial agency (District Attorney's Office or Attorney General's Office)? Yes _____ No ☒

(b) any city, county, federal or state law enforcement agency (police department, sheriff's department, highway patrol, F.B.I., etc.)? Yes _____ No ☒

(c) any city, county, federal or state correctional institution or detention facility? Yes _____ No ☒

(d) any criminal defense office (e.g., criminal defense law firm, Public Defender's Office, etc.)? Yes _____ No ☒

(e) any probation department or parole department? Yes _____ No ☒

(f) the judiciary (e.g., U.S. courts, state courts, etc.)? Yes _____ No ☒

(g) any other agency or organization connected with the criminal justice system (e.g. ACLU, Citizens for Law and Order, etc.)? Yes _____ No ☒

If you answered yes to any parts of question 10, please give details.

Who? When? What agency and in what capacity?

Are any members of your immediate family, household, or close friend in any way involved with:

- ☐ the Anderson County Solicitor's Office
- ☐ members of any other district attorney's office
- ☐ members of any Capital Defender's office
- ☐ any criminal defense attorneys
- ☐ any judges, court commissioners, or referees
- ☐ any court personnel (i.e., court reporters, clerks, etc.)
- ☐ any other type of attorneys or paralegals
- ☐ any parole or probation officers
- ☐ any person connected with the criminal justice system in any capacity
- ☐ any law enforcement agency

If your answer to any parts of question 11 is yes, please explain, including where the person works, how long they have been in the legal system, whether you discuss their jobs with them:

Have you had any experiences with crime and/or police and/or the media that have affected your view of the criminal justice system? Yes ☐ No ☒

If yes, please explain.

Have you or any close friend or relative ever visited any jail, prison, or juvenile detention or been incarcerated in a facility? If yes, please explain [include who, when, where, why they were incarcerated].

No

Have you ever done any of the following:

(a) written a letter or appeared in court to urge leniency in sentencing on behalf of a defendant? Yes ☐ No ☒

(b) Written a letter or appeared on behalf of an inmate to urge his/her parole, or to oppose his or her parole? Yes ☐ No ☒

(c) Written a letter or appeared on behalf of a victim in any court proceeding or parole hearing? Yes ☐ No ☒

If the answer to any part of question 14 is yes, please explain:

Aside from jury service, have you ever been in a courtroom before for any other reason, including testifying as a witness or observing court? Yes _____ No ☒

If yes, please explain:

Have you ever known anyone who died as a result of violence? Yes ☒ No _____

If yes, please explain: My Cousin was killed by her husband
he ran her off the road.

Have you ever been threatened or in fear for your life? Yes _____ No ☒

If yes, please explain:

Have you, any family members, or close friends ever been represented by Bill McGuire, John Delgado or Daniel Day? Yes _____ No ☒

Do you, or any member of your family own one or more firearms? Yes _____ No ☒

If yes, please describe:

What is your opinion about counselors, therapists, psychologists, and psychiatrists? I think its a
good thing to have those people to help others

ATTITUDES REGARDING THE DEATH PENALTY

What is your opinion regarding the death penalty, and why do you feel that way? my opinion about the death penalty is a good thing if need it and feel that if a person it guilty of a really bad crime should be punished

With reference to the death penalty, which of the following statements would best represent your opinion?

(circle the appropriate number):

1. I believe³ that the death penalty is the appropriate form of punishment in all murder cases.
- (2) I believe that the death penalty is the appropriate form of punishment in some murder cases and I could return a verdict of death if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
3. Although I do not believe that the death penalty ever ought to be imposed, as long as the law provided for it, I could vote to impose it if I believed it was warranted in a particular case, depending on the evidence, the law, and what I learned about the defendant.
4. I believe that the death penalty is the appropriate form of punishment in some murder cases, but I could never return a verdict of death.
5. I could never, under any circumstances, return a verdict of death.

What is your opinion regarding the sentence of life without possibility of parole, and why do you feel that way? I Believe if that person is guilty then they deserve what punishment they will get so yes I strongly believe in life sentence without possibility of parole.

If you are married or live as a couple, what is your spouse or partner's feelings on the death penalty and life without possibility of parole?

Do you have any other relatives or close friends with strong views about the death penalty or life without possibility of parole? Yes ___ No ✓

If yes, please describe:

Do you think the death penalty is used (circle one)

Too often

About the right amount

Too seldom

Other _____

Do you think that life imprisonment without the possibility of parole is a severe punishment?

Yes _____

No ☒ _____

Regardless of which box you checked, please explain your answer: *If you do the crime
you do the time.*

Do you believe life without the possibility of parole is a more severe form of punishment than a sentence of death? (Circle one)

Yes, more severe

No, less severe

Just as severe

Please explain: *Because that person is still living and eating
and the victim is not.*

Are the views of any of your relatives or close friends so strongly for or against the death penalty that you feel that you may be pressured by those views in deciding whether or not to impose the death penalty in this case? Yes _____ No ☒ _____

If YES, please explain: _____

Do you hold to any religious, moral feelings or philosophical principles that would affect your ability to vote for the death penalty as a judgment in this case?

Yes _____ No ☒ Please explain: _____

Are you affiliated with any organization that advocates in favor of the death penalty?

Yes _____ No ☒ _____

If yes, what organization? _____

Are you affiliated with any organization that advocates against the death penalty?

Yes _____ No ☒ _____

If yes, what organization? _____

CONCLUDING QUESTIONS

Is there anything else we should know about you as a prospective juror in this type of case?

2

Is there any matter that has not been covered by this questionnaire concerning the death penalty or your feelings and attitudes about the death penalty, or concerning any other subject that you feel that you should mention at this time that might affect your ability to be a qualified juror in this death penalty case?

Yes _____ No ☒ If yes, please explain:

As a result of filling out this questionnaire, have you formed any opinions about this case? Yes _____

No ☒ Please explain _____

I declare under penalty of perjury under the laws of the State of South Carolina that the above answers are true and correct.

DATED: 2-8-2010

386
Juror Number

Glenn Miller
Signature

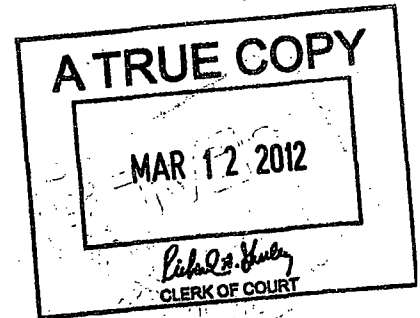
Date Oct. 8, 2008

Cathy M. Phillips
Anderson County Clerk of Court
100 S. Main Street
Anderson, SC 29624

FILED-CLERK'S OFFICE
ANDERSON SC

2008 OCT 13 A 10:01

COMMON PLEAS AND
GENERAL SESSIONS



To Whom It May Concern:

I, Raymondeze Rivera no further wish to have any legal representation or assistance with the following names below.

As of today your office and any other parties involved will be served upon by me via mail a letter stating in such terms above that your services are terminated and no longer needed. I was highly under the impression through my counsel that I was being brought back to Anderson County to prepare/strategize for my Capital Murder Trial. I was told that my trial would supposedly be tried in December of 2008. I found out that I was brought back to Anderson to help with the investigation due to some of the things I said on the stand at my last trial. I was even threatened by my counsel, that if I did not co-operate that I will be going back to prison. I feel as though I was brought back to Anderson County purposely under false pretenses. This is clearly a lack of trust between a client and his lawyers.

The language and spirit of the Sixth Amendment clearly contemplate that counsel, like the other defense tools guaranteed by the Amendment, shall be an aid to a "willing defendant" not an organ of the State interposed between an unwilling defendant and his rights. To thrust counsel upon the accused, against his considered wish, thus violates the logic of the Amendment. Under appropriate circumstances the Constitution requires that counsel be tendered; it does not require that under all circumstances counsel be forced upon a defendant. When the administration of the criminal law is hedged about as it is by the Constitutional safeguards for the protection of an accused, to deny him in the exercise of his free choice the right to dispense with counsel is to imprison a man in his privileges and still call it the Constitution. In such a case, counsel is not an assistant, but a master; and the right to make a defense is stripped of the personal character upon which the Amendment insists. It is true that when a defendant chooses to have a lawyer manage and present his case, law and tradition may allocate to the counsel the power to make binding decisions of trial strategy in many areas. This allocation can only be justified, however, by the "defendant's consent", at the outset, to accept counsel as his representative. An unwanted counsel represents the defendant only through a tenuous and unacceptable legal fiction. Unless the accused has acquiesced in such representation, the defense presented is not the defense guaranteed him by the Constitution, for, in a very sense, it is not his defense.

It is my right under the Constitution as a defendant to proceed in a state criminal trial without counsel, which I voluntarily and intelligently elect to do so. I am fully aware of

cc: Tarranta Solicitor Public Defender

the dangers and disadvantages of self-representation, so let the record show that I know and understand what I am doing and that my choice is made with an open eye.

The following people are terminated:

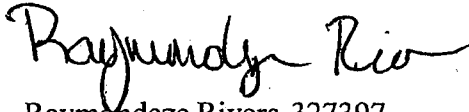
Robert Gamble
Anderson County Public Defender

Daniel Day
Attorney at Law

John Delgado
Attorney at Law

Bill S. McGuire
Chief Attorney, Capital Trial Division

Yours truly,



Raymondeze Rivera-327397
B.R.C.I.- Saluta 236 A
4460 Broad River Rd.
Columbia, SC 29210

FILED-CLERK'S OFFICE
ANDERSON SC
2008 OCT 13 A 10:01
COMMON PLEAS AND
GENERAL SESSIONS

3224

Raymondeze Rivera - 327397
BRCI - SIMU 236 A
4460 Broad River Rd.
Columbia, SC. 29210

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ANDERSON SC

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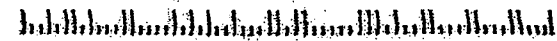
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COMMON PLEAS AND
GENERAL SESSIONS

Cathy M. Phillips
Anderson County Clerk of Court
100. S. Main Street
Anderson, SC. 29624



STATE OF SOUTH CAROLINA)

IN THE COURT OF GENERAL SESSIONS

COUNTY OF ANDERSON)

Indictment # 2007-GS-04-649

State of South Carolina)

Request For Motion To

v.)

Relieve Counsel

Raymondeze Lamon Rivera,
DEFENDANT)**A TRUE COPY**

MAR 12 2012

Richard A. Bullock
CLERK OF COURT

The Defendant would like to move this motion before the Presiding Judge of General Sessions Court on the date after service hereof or soon thereafter in compliance to the Sixth and Fourteenth Amendments of the United States Constitution, and pursuant to the provisions of U.S. v. Horton 845 F. 2d 1414, which expresses the Defendant's Rights to dispense counsel. Under appropriate circumstance the Constitution does not require that counsel be forced upon a defendant.

The Defendant has already addressed his concern to the Court in a discrete letter how counsel has been thrust upon him against his considered wish and their refusal to apply their legal capabilities in the best interest for the Defendant, thus violates the logic of the Amendment. In such case counsel is not an assistant, but a master; and to deny him in the exercise of his free choice the right to dispense with counsel is to imprison a man of his privileges and still call it the Constitution.

To avoid any further conflict of interest or otherwise publicized, the Defendant seeks the assistance of the Honorable Court in correcting the problem and relieving him the counsel of Robert A. Gamble, Esquire, R. Daniel Day, Esquire, John D. Delgado, Esquire, and Bill S. McGuire, Esquire and to proceed pro se.

COMMON PLEAS AND
GENERAL SESSIONS

2008 OCT 30 A 10:22

FILED-CLERK'S OFFICE
ANDERSON SC

s/ Raymonde Rivera
Raymondeze Rivera- 327397
B.R.C.I. SNW 236
4460 Broad River Rd.
Columbia, SC 29210

this 27th day of Oct., 2008

FILED-CLERK'S OFFICE
ANDERSON SC
2008 OCT 30 A 10:22
COMMON PLEAS AND
GENERAL SESSIONS

September 21, 2009

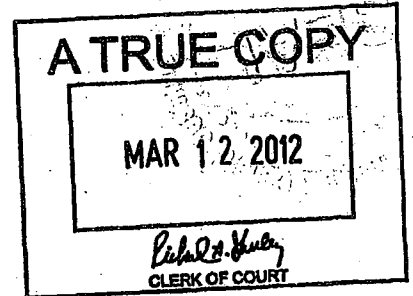


Cathy M. Phillips
Anderson County Clerk of Court
P.O. Box 8002
Anderson, SC 29622

RE: 1) Motion to Relieve Counsel
2) Motion to Dismiss Charges

Indictment # 2007-GS-04-649

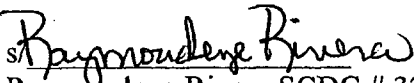
Dear Ms. Phillips:



Please take notice that Mr. Raymondeze Rivera has filed with your office pro se, a motion to Relieve Counsel of Mr. John Delgado, Esq. and Mr. Bill McGuire, Esq. and a motion to Dismiss Charges dated August 28, 2009. Mr. Rivera wish to have no further contact or any legal representation with his current counsel due to conflict of interest and ask that two competent attorneys be appointed or he will proceed pro se in the above indictment. He would like both motions to be filed and heard in the General Session Court of Anderson County and urge that a hearing be scheduled to resolve this matter as swiftly as possible.

Additionally, Mr. Rivera request that a copy of both motions above that was filed be mailed to him along with the clerk of seal of approval to the below address.

Respectfully yours,


Raymondeze Rivera SCDC # 327397
BRCI- SMU 232A
4460 Broad River Road
Columbia, SC 29210

FILED-CLERK'S OFFICE
ANDERSON SC
2009 SEP 21 P 2:30
CLERK OF COURT'S AND
GENERAL SESSIONS

STATE OF SOUTH CAROLINA)

COURT OF GENERAL SESSIONS

COUNTY OF ANDERSON)

THE TENTH JUDICIAL CIRCUIT

State of South Carolina,)

Indictment # 2007-GS-040-0649

vs)

Raymondeze L. Rivera,)
Defendant)

CERTIFICATE OF SERVICE

I, Raymondeze Rivera certify that the foregoing information contain in this proof of service is true and correct to the following individuals listed below:

Persons Served: 1) Cathy M. Phillips
Anderson County Clerk of Court
P. O. Box 8002
Anderson, SC 29622

2) Chrissy Adams, Esq.
10th Circuit Solicitor
P. O. Box 8002
Anderson, SC 29622

Documents: *Letter to Relieve Counsel
and to Dismiss Charges*

s/ Raymondeze Rivera
Raymondeze Rivera SCDC #327397
BRCI-SMU 232A
4460 Broad River Rd.
Columbia, SC 29210

This 21st day of Sept., 2009

FILED-CLERK'S OFFICE
ANDERSON SC
2009 SEP 21 P 2:30
CLERK OF COURT
AND
GENERAL SESSIONS

ENTERED
MCA



STATE OF SOUTH CAROLINA)

COURT OF GENERAL SESSIONS
FOR THE TENTH JUDICIAL CIRCUIT

COUNTY OF ANDERSON)

Indictment # 2007-GS-040-0649

State of South Carolina,)

vs)

MOTION FOR A CHANGE OF VENUE

Raymondeze Rivera,)

Defendant)

If you will please take notice that the defendant, Raymondeze Rivera moves before the Presiding Judge of General Sessions Court on the date after service hereof or as soon thereafter as defendant may be heard requesting for a change of venue. By the Fourteenth Amendment and Due Process Clause the defendant has a right to have a change of venue under the United States Constitution and Article 5, Section 23 of the Amendments to the South Carolina Constitution.

Whether to change venue is a matter addressed to the sound discretion of the trial judge and will not be disturbed. Sheppard v. State, 357 S.C. 646, 594 S.E. 2d 462 (2004). The defendant ask that the Court grant this motion because of past and future pretrial publicity and believes without a shadow of doubt that the community of Anderson County remembers his trial in February 11 through 13, 2008, while taking the stand live with TV cameras present implicating himself in the murder of two Anderson County women. One of the victims is Kwana Burns who is well-known in the community of Anderson. This is a very high-profile and sensitive case which the State has decided to seek the death penalty against the defendant in the indictment above.

In Rideau v. Louisiana, 373 U.S. 723 (1963), the United States Supreme Court found reversible error in a trial court's refusal to grant motion for a change of venue due to the effect of pretrial publicity. There, the court found that the people of Calcasieu Parish in Lake Charles, Louisiana, were "exposed repeatedly and in depth to the spectacle of Rideau personally confessing in detail to the crimes and heard his televised interview with the sheriff which he was later to be charged". The present case in the above indictment is clearly similar against the defendant.

For all of these reasons heard denying this motion would be plainly prejudice to the defendant's case. The defendant respectfully requests a change of venue and any further relief as the court would deem just and appropriate for the circumstances.

Respectfully submitted,

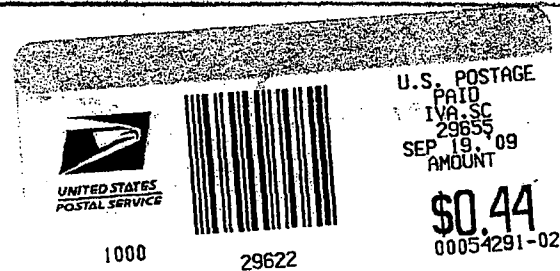
s/ Raymondeze Rivera
Raymondeze Rivera #327397
BRCI- SMU 232A
4460 Broad River Road
Columbia, SC 29210

COURT CLERK'S OFFICE
ANDERSON SC

2009 SEP 21 P 2:30

FILED-CLERK'S OFFICE
ANDERSON SC

Raymondeze Rivera 327397
 BRCI-smu 232A
 4460 Broad River Rd.
 Columbia, SC 29210



FILED-CLERK'S OFFICE
 ANDERSON SC

2009 SEP 21 P 2:30

MON PLEAS AND
 GENERAL SESSIONS

Cathy M. Phillips
 And. County Clerk of Court
 P.O. Box 8002
 Anderson, S.C. 29622



Psychiatric Evaluation

Name: Raymondeze L. Rivera

Date of Birth: 4/20/78

County of Proceedings: Anderson

Dates of Evaluation: 4/28/09, 5/21/09

Date of report 5/26/09

DEPARTMENT OF NEUROPSYCHIATRY AND
BEHAVIORAL SCIENCE
SCHOOL OF MEDICINE

Identifying Information: Mr. Raymondeze Rivera is a thirty-one year old African American/Hispanic male evaluated pursuant to a court order from the Honorable J.C. Nicholson Jr.

Purpose of Evaluation: Mr. Rivera has capital charges of Murder in Anderson County. A competency evaluation was requested after a hearing on December 8, 2008 after his defense counsel opined he was incompetent.

Sources of Information:

- Discovery List 1- 243 provided by Chrissy T Adams 11/10/08
- Transcript of Testimony of Raymondeze L. Rivera 2/13/07
- Transcript of Interview Raymondeze Rivera 2/28/08
- Interview Douglas County Detention Center 12/21/06 Lt. Layton Creamer 10:50am
- Statement of Defendant 12/21/06 11:12 am
- Incident Report Asha Wiley 12/11/06
- Investigative Followup 1290-1294
- Report Dr. Michael Cross 1/10/08, 5/7/08
- Report Dr. Mayank Dalal 3/26/07
- * Social History by Randi Pickens with Shena Scott as informant
- RAP Sheet
- * Florida department of Child and family Services record 2003-2005
- * Report of Runaway 3/27/92
- * Temporary Guardianship 9/2/94 (Katherine Cousin)
- Douglas County School records
- * Sligh Middle School Records
- * Dekalb Medical Center records
- * Southwest Medical records 6/23/96 Heart palpitations
- * Grady Medical records
- DeKalb County Police records
- Fulton County Police Records
- Anderson County Detention Center Records
- Fulton County Jail Records -2003

- Hillsborough Circuit Court Records Shena Scott v Edward Scott 1995
- Sarasota Clerk of Court Records
- South Carolina Department of Corrections Records 10/1/08-12/29/08 Dr. Poiletman
- Arrendale State Prison records
- Statement of Phoebe Kennedy 9/28/99
- Correspondence to various women and family members
- Job Corps records 1996
- Employment records
- Criminal History Stanley Rivera 1976
- Attempted Evaluation 3/10/09
- Attempted Evaluation 4/9/09
- Evaluation 4/28/09
- Evaluation 5/21/09

Pertinent Statements:

Developmental History:

Mr. Rivera reports he was born with extra finger on right hand. In a social history obtained by Randi Pickens, his mother notes he was born with a heart murmur. Records indicate that Mrs. Scott was married to Stanley Rivera on 2/8/76 and separated from him on 9/77. Raymendeze Rivera was born in 1978. His paternal grandmother was awarded guardianship when he was 16. He was raised by his father and was reported as a runaway at age 13. He was found at his mother's. He reports his mother was unable to care for he and his older brother and they were left at the stairs of Grady Memorial Hospital. His father raised him along with his paternal grandmother.

*** School History:**

Mr. Rivera was retained in kindergarten. School records indicate he scored consistently low on ITBS testing. He made very poor grades from junior high school onwards. He entered Job Corps and received good evaluations as he prepared for his GED. He was terminated from Job Corps on 12/20/96 when he was charged with Theft and Breaking and Entering.

Employment Records:

Mr. Rivera had training as a receptionist, kitchen helper and computer repair while at Job Corps. He has held various positions of employment.

Medical History:

Mr. Rivera had a history of an adverse reaction to marijuana and was treated at Southwest Hospital in 1996 where he was seen for palpitations. He was found to be hypokalemic as well. He reports he stopped using marijuana after that time. He has a history of knee pain for which he uses a brace and medications. He has also been treated for fungal infections in the past. He is reportedly allergic to oatmeal and fish.

Psychiatric History:

Although these records are not presently available, a statement from Renee Karls and Mr. Rivera's own report indicates he participated in Anger Management classes when he

resided in Georgia. He had no documented history of inpatient or outpatient treatment before then. He was seen by SCDC psychiatrist Dr. Poiletman and has been diagnosed with Bipolar Disorder and treated with Seroquel® 600mg XR at night and Neurontin® 1200 mg per day. He began receiving these medications 11/14/09 and has steady improvement in his behavior since his dosage was increased on 12/9/08. SCDC Mental Health noted that on 10/6/08, Mr. Rivera had a 45 lb weight loss. The records reflected that Mr. Rivera was abandoned by his mother, physically abused by his father and that he witnessed his mother being physically abused. He was also initially diagnosed with Intermittent Explosive Disorder at SCDC. Records reflect he was suspicious on 10/1/08. He was evaluated by Mayank Dalal on 3/26/07 who noted that he was physically abused at ages 9 and 10. He also reported depressive symptoms when he was in 11th grade. He would not talk about his "mental problem" but did report disturbed sleep. Dr. Dalal diagnosed him with Impulse Disorder Not otherwise Specified and Antisocial Traits. He was evaluated by Dr. Cross on 1/10/08 who noted that he had not spoken with his attorney since 3/07 and was unsure why he was being evaluated. Dr. Cross noted that Mr. Rivera spoke with Mr. Gamble and then terminated the evaluation. He was seen again on 3/11/08 and noted to complain of limited sleep and a poor appetite. He was noted under heading #4 to have issues of trust with his attorneys. Dr. Cross diagnosed him with malingering.

Substance Use History:

Mr. Rivera reports he used alcohol heavily around the time of his offenses, he used marijuana heavily in the past but reports he stopped in 1996 after he had heart palpitations and was treated at Southwest Hospital.

Family History:

Stanley Rivera was disabled on 11/79 in an accident that caused him to lose a kidney and break his leg. He died from cardiac disease. His father was placed on Probation in 1976 for stealing watches from UPS (Theft By Taking). He has a paternal cousin diagnosed with schizophrenia.

Legal History:

Mr. Rivera was sentenced to Life in prison by the Honorable JC Nicholson Jr. on 2/13/08 for the Murder of Asha Wiley. Mr. Rivera was released from the Job Corps program in 1996 when he was charged with Theft. He was charged with a Domestic Incident against Renee Karls on 4/26/02. He was charged with Simple Assault, Cruelty To Children, Battery and Trespassing on 6/27/02 with the victim being Renee Karls. His bond was revoked for a Burglary charge on 12/7/02, which was dropped on 1/6/03. He was sentenced to 10yrs suspended upon service of 2 yrs and one year probation for the Aggravated Assault and Battery of Renee Karls on 9/26/03 and banished from the state of Georgia.

He was charged with rape in 1999 and reports the case was "dead docked." He was also charged with Terroristic threats on 4/15/97.

Corrections History:

Mr. Rivera has a prior history of confinement at Arrendale State Prison from 2003-2005. Records indicate that on 3/10/04, he "feels life is being threatened." Records also indicate he reported: "Inmates were making sexual threats."

Relationship History:

Mr. Rivera was in an abusive relationship with Renee Karls, who is the mother of his son Justice. He was imprisoned for assaulting her and banned from the state of Georgia. He has a daughter from Keisha Jones, Jenneya who was born on 9/22/03. He has another child according to a social history provided to Randi Pickens with his mother as an informant. He has charges of raping a female in 1999 which were 'dead docked.'

Sexual History:

Mr. Rivera admits he was the victim of homosexual advances by a minister with whom he lived. He states that the minister would ask him to disrobe so he could rub spiritual ointments on him.

Trauma History:

Mr. Rivera has disclosed that he was physically abused by his father to a number of sources, including Dr. Dalal, Dr. Poiletman and the undersigned. He did runaway while on a school field trip when he was 13.

Mental Status Examination:

On the first attempted interview, Mr. Rivera politely declined to participate. This examiner allowed him to read the court order, yet he continued to refuse. This examiner asked if there was anything she could do to facilitate an evaluation, and Mr. Rivera reported he did not like his present housing. This examiner scheduled an evaluation at the University of South Carolina School of Medicine. Mr. Rivera refused transportation. This examiner again attempted to interview Mr. Rivera. He asked that this examiner read a letter aloud he had prepared which outlined his reasons for refusing examination. On the fourth and fifth evaluation attempts, Mr. Rivera was cooperative. Prior to each evaluation, Mr. Rivera was upset with a corrections officer. At the commencement of the fourth evaluation, Mr. Rivera was angry and could be heard yelling at a corrections officer. He reports the officer referred to him as a "bitch." He was tearful at the commencement of the fifth evaluation after he reported his hand was injured when Sgt. Wills of SCDC closed the flap on his hand. Despite being upset at the onset of the fourth and fifth psychiatric evaluation; Mr. Rivera was polite and cooperative with this examiner. He maintained good eye contact throughout the interviews. His speech was normal in rate and tone. His thinking was goal directed. He was not psychotic. He did exhibit paranoid ideation towards this examiner during the first and third attempted evaluator. He wrote that this examiner would not fool him into participating. He also exhibited paranoid ideation towards a corrections officer during the fourth and fifth evaluation. He was not suicidal or homicidal. His cognitive functions were intact. His mood was dysphoric on both occasions. His affect was constricted. His judgment is impulsive by history. He has some insight into his mood disorder, but no insight into the role anxiety plays in his mental state.

Diagnoses:

Axis I) Bipolar Disorder, by History

Malingering, By History

Impulse Control Disorder, Not Otherwise Specified by History

Post Traumatic Stress Disorder, provisional

Alcohol Abuse, provisional

Axis II) Borderline Personality Traits

Antisocial Personality Traits By History

Personality Disorder, Not Otherwise Specified with antisocial traits, by history

Axis III) Knee pain, fungal infection of skin by history

Discussion of Diagnoses:

Bipolar Disorder, By History: Dr. Poiletman of the South Carolina Department of Corrections has diagnosed Mr. Rivera with Bipolar Disorder. His behavior has steadily become more cooperative since being prescribed these medications in the latter part of 2008: Mr. Rivera does report a history of mood instability and prior episodes of depressive symptoms. Dr. Dalal noted that he complained of depression in 11th grade. Dr. Cross noted in his evaluation of Mr. Rivera in 5/08 that Mr. Rivera reported a low mood. Mr. Rivera reports that he was depressed at the time of his first trial and deliberately worsened the outcome of his case because he was experiencing passive suicidal ideation. He maintained his opinion that he wanted to die until early 2009, which is coincidental to his treatment with psychotropic medications by the Department of Corrections. Mr. Rivera reports periods of irritability with others for periods of time. He describes periods of goal-directed activity associated with hypersexuality and decreased need for sleep. He does have a paternal family history of schizophrenia. Mr. Rivera has been compliant with his prescribed medications.

Malingering By History: Dr. Cross diagnosed Mr. Rivera with Malingering during his CR evaluation. Presently, Mr. Rivera does not meet the diagnostic criteria for malingering. He denies active symptoms of psychosis and in fact, reports improvement in his symptoms with medications.

Impulse Control Disorder Not Otherwise Specified by History: Dr. Dalal diagnosed Mr. Rivera with this disorder during 2007. At this time, there is no further evidence to support this diagnosis.

Post Traumatic Stress Disorder, provisional: It is my opinion to a reasonable degree of medical certainty that Mr. Rivera provisionally meets the diagnostic criteria for Post Traumatic Stress Disorder. He was physically abused in childhood according to reports given to Drs. Dalal, Poiletman and the undersigned. His mother noted in a social history provided to Randi Pickens that his father was physically abusive to him. Mr. Rivera has shown autonomic arousal when dealing with males who "lay their hands on him." Mr. Rivera becomes argumentative whenever his bodily integrity is threatened. Further corroborating information is needed.

Alcohol Abuse: Mr. Rivera has a paternal history of alcoholism. Mr. Rivera reports he was drinking heavily during the time of his offenses. He has legal troubles because of his substance abuse and therefore meets the diagnostic criteria for alcohol abuse. Further information is needed.

Axis II illnesses: Mr. Rivera has been diagnosed with personality traits versus disorders. He has marked borderline personality traits including: impulsivity, suicidal ideation, identity disturbance, severe reactions to rejection. His traits arise from his history of abandonment and physical abuse.

Opinions:

Mr. Rivera presently has a rational and factual understanding of the proceedings and the capacity to assist in his defense. Since he has been prescribed psychotropic medications, his mood has improved and he no longer wishes to receive the death penalty. He reports an improved relationship with his attorneys and no longer voices paranoid ideation. In the past, he voiced paranoid ideation towards his former attorney Robert Gamble. He reports that in his first hearing, he would not sign a plea agreement because he did not trust his attorney. He no longer wishes to proceed pro se. It is recommended that he have a Guardian ad litem appointed to ensure his interests are represented in case he has fluctuations in his mental status.

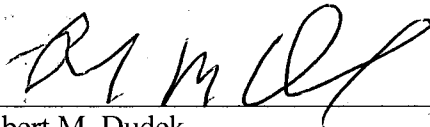
Donna Schwartz-Watts, M.D.

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CERTIFICATE OF COUNSEL FOR APPELLANT

Counsel for appellant certifies that this Record on Appeal contains all material proposed to be included by any of the parties and not any other material and that this Record on Appeal complies to the best of my ability, with the August 13, 2007, order from the South Carolina Supreme Court entitled "Interim Guidance Regarding Personal Data Identifiers and Other Sensitive Information in Appellate Court Filings."

April 2nd, 2012



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