

Supplemental Juror Questionnaire

Introduction: This questionnaire is designed to obtain additional information regarding your qualifications to sit as a juror in an upcoming trial involving allegations of second-degree murder. Through the use of the questionnaire, the process of jury selection should be shortened.

It is not our intent to embarrass anyone. Your responses will assist in making the jury selection process more efficient and less time consuming. There are no right or wrong answers, only truthful answers. Please provide complete answers so the attorneys can avoid asking these specific questions during the jury selection process.

The answers you give here will become part of the trial court record and will be used by the judge, attorneys, and their assistants in selecting a qualified jury. IF YOU FEEL UNCOMFORTABLE SHARING A RESPONSE TO ANY QUESTION IN THIS FORMAT, PLEASE INDICATE THAT YOU WOULD LIKE TO SPEAK PRIVATELY TO THE COURT CONCERNING YOUR ANSWER TO THE PARTICULAR QUESTION.

This questionnaire concerns the case of State v. Seth Brunell. Mr. Brunell is charged with second-degree murder in connection with the death of Zachary Barbeau (also known as Fern Feather) on or about April 12, 2022, in Morristown, Vermont.

Your answers to the enclosed questions must be given without consulting any other person. Check the line Yes or No and furnish answers or details in the space provided where appropriate. Please also initial the top of each page in the space provided. If you do not have enough room in the allotted space, use the margins or the last page. PLEASE DO NOT WRITE ON THE BACK OF ANY PAGES. The Court directs you not to discuss with anyone, including your fellow jurors and the lawyers on both sides, this questionnaire, your answers, or any other matters in connection with this case.

Please understand that you are required to be truthful in your responses. It is critical that you provide complete and accurate answers for each question. Thank you.

Important Instructions

PLEASE DO NOT discuss this questionnaire or your possible service on this jury with anyone, including your fellow potential jurors. Do not do any research or investigation concerning any aspect of this matter. Do not ask others if they are aware of the case and do not perform any internet research or searches about the case, the parties, the events, or the attorneys. Also, do not make postings on social media about your possible service on this case because you may obtain information about the case in response to the posting. It is vital that jurors selected in the case base their verdict solely on the evidence presented in the courtroom.

Please return this completed questionnaire in the enclosed envelope by September 13, 2024. Thank you.

Supplemental Juror Questionnaire

1. Your Name: _____ Age: _____
2. Place of Birth: _____ What pronouns do you use? _____
3. Town of Residence: _____ Length of time at this residence: _____
4. The dates for this trial are October 14 – 21, 2024. Is there any reason you would be unavailable for any of these dates?
☐ Yes. ☐ No. If yes, please explain:

5. The charge in this case involves an allegation of murder. Is there anything about the nature of the charge that would affect your ability to be a fair and impartial juror in this matter?
☐ Yes. ☐ No. If yes, please explain:

6. The defendant in this case is Seth Brunell. Do you or any members of your immediate family know Mr. Brunell or anyone in Mr. Brunell's family?
☐ Yes. ☐ No. If yes, please explain:

7. Seth Brunell is accused of murdering Zachary Barbeau, who was also known as Fern Feather. Did you or any members of your immediate family know Zachary Barbeau (Fern Feather) or anyone in their family?
☐ Yes. ☐ No. If yes, please explain:

8. Do you or any members of your immediate family know any of the following potential witnesses in this case?

Det. Sgt. Isaac Merriman	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Sgt. Sam Truex	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Sgt. Frank LaBombard	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Sgt. Seth Richardson	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Sgt. Drew Cota	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Capt. Scott Dunlap	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Lt. Todd Baxter	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Det. Sgt. Aimee Nolan	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Sgt. Aaron McNeil	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Sgt. Amber Keener	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sgt. Blake Cushing	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Tpr. Brandon Gallant	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Tpr. Michelle Archer	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Tpr. Mathew Nadeau	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Tpr. Matthew Chin	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Tpr. Kyle Fecher	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Tpr. Blaz Mihaljevic	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sr. Sgt. Joseph Paquette	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Dale Porter	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Officer Lance Lamb	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Chief Jason Luneau	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sgt. Garth Christensen	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Officer Lucas Marcoux	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sgt. James Sawyer	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Officer Bruce Emerson	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Lt. Fredrick Whitcomb	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Deputy Chris Watson	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Deputy James Griffin	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Eliza Curtis	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Karen Cleary	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Jennifer Thoma	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Danielle Lowe	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Nina Shoenthal	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Travis Douglass	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Jon Grogan	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Gram O'Dowed	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Andrew Lay	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Dr. Elizabeth Bundock	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Det. Tpr. Michael Mattuchio	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Initial _____

Sgt. Dan Trottier	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Brenda Butler (resides in Texas)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Donald Hayden (resides in Missouri)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please explain how you know the individual(s):

Is there anything about your knowledge of the individual(s) that would affect your ability to be a fair and impartial juror in this matter?

9. This case is being defended by Jessica Burke, Esq. of the law firm Burke Law. Do you or any of your immediate family members know or have any connection to Attorney Burke, or anyone else in her law firm, specifically Attorney Leah Henderson, Attorney Debby Pakbaz, Attorney Rory Malone, Attorney Simone Washington, or Attorney Emmett Wood?

☐ Yes. ☐ No. If yes, please explain:

Is there anything about your knowledge of the individual(s) that would affect your ability to be a fair and impartial juror in this matter?

10. Which of the following describes your general opinion of Burke Law:

☐ Positive ☐ Neutral ☐ Negative ☐ No opinion

11. This case is being prosecuted by the Lamoille County State's Attorney's Office. Do you or any of your immediate family members know or have any connection to Attorney Aliena J. Gerhard, Attorney Todd Shove, Attorney Jennifer Hill, Kim Greene, Patricia Foster, Holly Jones, Siri Rooney, Sierra Boutin, or Ally Scanlon?

☐ Yes. ☐ No. If yes, please explain:

Is there anything about your knowledge of the individual(s) that would affect your ability to be a fair and impartial juror in this matter?

12. Which of the following describes your general opinion of the Lamoille County State's Attorney's Office:

☐ Positive ☐ Neutral ☐ Negative ☐ No opinion

13. Law enforcement officers will be testifying in this trial. Which of the following describes your general opinion of law enforcement officers:

☐ Positive ☐ Neutral ☐ Negative ☐ No opinion

14. Have you, or anyone close to you, had an interaction with a law enforcement officer that would affect your ability to be a fair and impartial juror in this matter?

☐ Yes. ☐ No. If yes, please explain:

15. Prior to completion of this survey, had you heard or read anything about Seth Brunell, Zachary Barbeau (also known as Fern Feather), or this case?

☐ Yes. ☐ No. If yes, please explain:

Have you formed any opinions based on media reports, or any other source of information, about this case?

☐ Yes. ☐ No. If yes, please explain:

If selected as a juror, do you believe you would be able to set aside any opinions formed and any information you have heard about this matter and listen to the evidence with an open mind?

☐ Yes. ☐ No. If no, please explain:

16. In this case, you may hear evidence of illicit substance use. Is there anything about the use of illicit substances that would affect your ability to be a fair and impartial juror in this matter?

☐ Yes. ☐ No. If yes, please explain:

Initial _____

17. In this case, there may be testimony that the decedent identified as gay, bisexual, transgender, or non-binary (someone who does not identify as either male or female). Would hearing testimony of this nature affect your ability to be a fair and impartial juror in this matter?

☐ Yes. ☐ No. If yes, please explain:

18. Will any of the answers you have provided in this questionnaire, or any other opinions or beliefs that you hold, interfere with your ability to follow the judge's instructions as to the law and to render an impartial verdict based solely on the instructions you are provided and the evidence you will hear during the trial?

☐ Yes. ☐ No. If yes, please explain:

19. Is there any other reason why you believe you could not be a fair and impartial juror in this matter?

☐ Yes. ☐ No. If yes, please explain:

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper appears to be a standard notebook page, possibly from a composition book or a legal pad. The edges of the paper are slightly irregular, suggesting it might be a scan of a physical document. There is no handwriting or other markings on the page.