

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ALBERT SNYDER,
Plaintiff

v.

FRED W. PHELPS, SR.,
SHIRLEY L. PHELPS-ROPER,
REBEKAH A. PHELPS-DAVIS, and
WESTBORO BAPTIST CHURCH, INC.
Defendants

Civil Action No. 1:06-cv-1389-RDB
Judge Bennett

PLAINTIFF'S PROPOSED SUPPLEMENTAL JURY QUESTIONNAIRE

1. Have you or someone you know participated in any protest concerning the wars in Afghanistan or Iraq?

2. Have you or a family member ever observed a funeral being protested?

3. Do you think or believe that all Catholic priests are pedophiles?

4. Do you or does someone you know suffer from diabetes?

5. Do you or someone you know believe that U.S. military personnel are dying in Iraq or Afghanistan as a result of a punishment from God?

6. Would you, if the law and facts supported such a verdict, hesitate to return a verdict against an organization solely because it holds itself out as a church?

O = prose D's object
wbc/phelps object to all 6

SEP 04 2007

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND – BALTIMORE DIVISION

ALBERT SNYDER,

Plaintiff,

vs.

Case No. 1:06-cv-1389-RDB

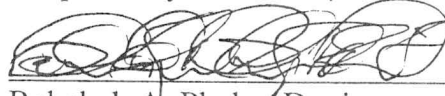
FRED W. PHELPS, SR.;
SHIRLEY L. PHELPS-ROPER;
REBEKAH A. PHELPS-DAVIS; and,
WESTBORO BAPTIST CHURCH, INC.,
Defendants.

PROPOSED QUESTIONS FOR JURY QUESTIONNAIRE
SUBMITTED BY DEFENDANTS PHELPS-DAVIS & PHELPS-ROPER

Pursuant to the Court's scheduling order, pro se defendants Phelps-Davis and Phelps-Roper submit the attached proposed questions for a jury questionnaire, and request that the Court include these questions in a questionnaire to the jury to be answered prior to voir dire.

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Respectfully submitted,



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&



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CERTIFICATE OF SERVICE

We hereby certify that the foregoing filing was served on August 31, 2007, as follows:

Original + 2 copies, with 2-hole punch, by express mail, in sealed envelope, with notice of filing of sealed document, with return envelope, to:

U S District Court Clerk
101 W. Lombard Street, 4th Floor
Baltimore, MD 21201

Copy by regular mail to:

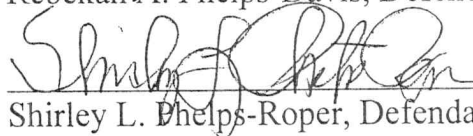
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Rebekah A. Phelps-Davis, Defendant Pro Se



Shirley L. Phelps-Roper, Defendant Pro Se

Snyder v. Westboro Baptist Church, Inc., et al.
Case No. 06-CV-1389

JURY QUESTIONNAIRE

1. Do you believe unpopular speech is covered or protected by the First Amendment?
2. Do you believe that speech you consider “hate speech” is protected under the First Amendment?
3. Do you believe people have the right to engage in speech that you consider offensive?
4. Do you have views that you believe are not main stream?
5. Do you believe speech that makes you very uncomfortable should be permitted?
6. Have you ever protested the government, any branch, at any level? Why and when?
7. Have you ever engaged in a protest, demonstration or picket? When, where and about what?
8. Have you ever engaged in First Amendment speech or religious activity that was controversial? What and when?
9. Do you believe people have the right to engage in religious practices which are unpopular?
10. Do you practice a faith that is not main stream?
11. What is your opinion about whether God hates humans?
12. What is your opinion about whether God punishes people or nations for sin?
13. What is your opinion about whether tragedies or catastrophes (such as 911, the collapsed bridge in Minnesota, hurricanes, floods, etc.) are caused by God?

14. Do you believe adultery is a sin?
15. How do you define adultery?
16. Have you ever committed adultery as you define it?
17. Do you believe churches should preach against sin?
18. Do you believe America is being punished for the sins of Americans?
19. Do you believe parents should teach their children to obey the Bible?
20. Do you believe in the Bible?
21. Do you take the Bible literally?
22. What is your opinion of people who take the Bible literally?
23. How would you rate your knowledge of the content of the Bible?
24. Do you believe people have the right to teach their children what they believe about the Bible and how to live according to the commandments of the Bible?
25. Do you believe that divorce is a sin?
26. Do you believe that divorce is allowed in the Bible under any circumstances? When?
27. Have you ever been divorced?
28. What is your marital status?
29. Do you have any family member(s) who has/have been divorced?
30. Do you believe divorce is the equivalent of adultery?
31. Are you or have you ever been a member of the Roman Catholic Church?
32. What experience if any do you have with the Roman Catholic Church?

33. What knowledge do you have about the doctrines or practices of the Roman Catholic Church?
34. Have you seen media reports about priests of the Roman Catholic Church allegedly molesting young boys or girls? What is your opinion about this issue?
35. Do you believe that people have the right to criticize the Roman Catholic Church?
36. Do you believe idolatry is a sin?
37. What is your definition of "idolatry?"
38. What are your views about the war in Iraq?
39. What are your views about the American troops in Iraq?
40. What are your views about the war in Afghanistan?
41. What are your views about the American troops in Afghanistan?
42. Do you believe people should be allowed to protest about the war, for or against?
43. Are you a member of the military?
44. Are you a member of the National Guard?
45. Have you been a member of the military in the past?
46. Have you been a member of the National Guard in the past?
47. Are you a veteran?
48. Do you have a member of your family or friend who is currently in the military?
49. Do you have a family member or friend who was in the past an active member of the military?

50. Do you have a family member or friend who is a veteran of war?
51. Do you have a family member or friend who is currently in the National Guard?
52. Do you have a family member or friend who was in the past an active member of the National Guard?
53. Do you believe people who die in a war are heroes, no matter how they lived?
54. Have you ever participated in a demonstration or protest about the war?
55. Have you attended the funeral of any soldier or veteran? When?
56. Have you specifically attended the funeral of a soldier who died in Afghanistan or Iraq? When?
57. Have you ever participated in a demonstration or protest about "gay rights?"
58. Have you expressed a public opinion about "gay rights?"
59. Are you gay?
60. Do you have any family members or friends who are gay?
61. Do you believe the government should provide special protection or rights to homosexuals?
62. Do you believe homosexuality is a sin?
63. Do you believe churches should preach or teach against homosexuality?
64. Do you believe people have the right to publicly condemn or disagree with homosexuality?
65. What is your opinion about psychologists and psychiatrists?

66. Do you understand the difference between the education and training of a psychiatrist and a psychologist?
67. Do you believe that people can disagree with the psychiatric profession on religious grounds?
68. Have you ever heard of Westboro Baptist Church in Topeka, Kansas? What is your view of that church?
69. Have you ever heard of Fred Phelps, a pastor in Topeka, Kansas? What is your view of Pastor Phelps?
70. Have you heard of the picketers who protest outside of soldiers' funerals? What is your view of those picketers?
71. Have you heard of Richard Bennett, either as a political candidate or judge? What is your view of Richard Bennett?
72. Have you heard of Albert Snyder? What is your view of Albert Snyder?
73. Have you heard of an organization called the Patriot Guard? What is your view of the Patriot Guard?
74. Have you been involved in any legal proceeding as a party? If so, what kind of case, what was your status, and what was the outcome?
75. Have you been involved in any legal proceeding as a witness? What kind of case and what was your role?

FILED _____ ENTERED _____
LODGED _____ RECEIVED _____

SEP - 4 2007

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
Baltimore Division

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
NIGHT DROP BOX

ALBERT SNYDER, :
 :
 Plaintiff : Civ. No. 1:06-cv-01389-RDB
 :
 v. :
 :
 FRED PHELPS, et al, :
 :
 Defendant. :

PROPOSED JURY QUESTIONNAIRE QUESTIONS
SUBMITTED BY DEFENDANTS FRED PHELPS, SR., AND WESTBORO BAPTIST CHURCH

Pursuant to the Court's scheduling order, Defendants Fred W. Phelps, Sr., and Westboro Baptist Church (collectively, Defendants), submit the attached proposed questions for a jury questionnaire, to be completed by each juror prior to the jury selection phase of the trial in this civil action.

This Questionnaire is being filed under seal, and is being delivered to the Court and to all other counsel within twenty-four hours of the sending of this Questionnaire.

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Respectfully submitted,

/s/

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jon@markskatz.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by first-class mail, postage-prepaid, on September 4, 2007, to:

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Paul W. Minnich, Esq.
Craig Tod Trebilcock, Esq.

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Topeka, KS 66604

Shirley Phelps-Roper
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Topeka, KS 66604

Honorable Richard D. Bennett (Chambers Copy, by hand delivery)
Baltimore Division
101 W. Lombard Street
Baltimore, MD 21201
(410) 962-2600

Jonathan L. Katz

Snyder v. Westboro Baptist Church, Inc., et al.
Case No. 06-cv-1389

JURY QUESTIONNAIRE

✓ 1. Do you believe unpopular speech is covered or protected by the
First Amendment? *dup.*

Please state why or why not.

2. Do you believe that speech you consider "hate speech" is
protected under the First Amendment?

Please state why or why not.

✓ 3. Do you believe other people have the right to engage in speech
that you consider offensive? *dup.*

Please state why or why not.

✓ 4. Do you have views that you believe are not mainstream?

What are those views?

5. Do you believe speech that makes you very uncomfortable should be permitted?

Please state why or why not.

6. Have you ever protested the government, any branch, at any level? Please state why and when? *disagree*

7. Have you ever engaged in a protest, demonstration or picket? Please state when, where why and about what? *disagree*

8. Have you ever engaged in speech or religious activity that was controversial?

Please state the details, when the activity took place, and why it was controversial.

9. Do you believe people have the right to engage in religious practices that are unpopular?

Please state why or why not.

10. Do you practice a faith that is not mainstream?

Please provide details

11. What is your opinion about whether God hates humans?

12. What is your opinion about whether God punishes people or nations for sin?

13. What is your opinion about whether tragedies or catastrophes (such as September 11, the collapsed bridge in Minnesota, hurricanes, floods, etc.) are caused by God?

14. Do you believe adultery is a sin?

Please state why or why not.

15. How do you define adultery?

~~16.~~ Have you ever committed adultery as you define it?

~~17.~~ Do you believe churches should preach against sin?

~~18.~~ Do you believe America is being punished for the sins of Americans?

~~19.~~ Do you believe parents should teach their children to obey the Bible?

~~20.~~ Do you believe in the Bible?

If so, which version of the Bible?

~~21.~~ Do you take the Bible literally?

Please state why or why not.

22. What is your opinion of people who take the Bible literally?

Please provide the reason for your answer.

23. How would you rate your knowledge of the content of the Bible?

24. Do you believe people have the right to teach their children what they believe about the Bible and how to live according to the commandments of the Bible?

25. Do you believe that divorce is a sin?

26. Do you believe that divorce is allowed in the Bible under any circumstances? When?

✓ 27. Have you ever been divorced?

✓ 28. What is your marital status?

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dep

29. Do you have any family member(s) who has/have been divorced?

30. Do you believe divorce is the equivalent of adultery?

Please state why or why not.

31. Are you or have you ever been a member of the Roman Catholic Church?

32. What experience if any do you have with the Roman Catholic Church?

33. What knowledge do you have about the doctrines or practices of the Roman Catholic Church?

34. Have you seen media reports about priests of the Roman Catholic Church allegedly molesting young boys or girls? What is your opinion about this issue?

35. Do you believe that people have the right to criticize the Roman Catholic Church?

36. Do you believe idolatry is a sin?

Please state why or why not.

37. What is your definition of "idolatry?"

38. What are your views about the war in Iraq? _____

39. What are your views about the American troops in Iraq?

40. What are your views about the war in Afghanistan?

41. What are your views about the American troops in Afghanistan?

42. Do you believe people should be allowed to protest about the war in Iraq and Afghanistan, whether for or against it?

43. Are you a member of the military, including the National Guard?

If so, please state your military branch and current rank.

44. Have you been a member of the military -- including the National Guard -- in the past?

If so, please state your military branch, rank upon discharge, and type of discharge.

45. Are you a war veteran?

If so, please state when and where you served during wartime.

46. Do you have a member of your family or friend who is currently or was previously in the military?

Please provide brief details, including whether the person is a war veteran, and details about the person's wartime service.

47. Do you believe people who die in a war are heroes, no matter how they lived?

Please state the reason for your answer.

48. Have you ever participated in a demonstration or protest about the war in Iraq and Afghanistan?

If so, please state when and where was the demonstration?

49. Have you attended the funeral of any soldier or veteran?

If so, please state where and when the funeral took place, the name of the deceased soldier, and the branch in which the deceased soldier served.

50. Have you ever participated in a demonstration or protest about gay rights?

If so, please state when and where the demonstration took place, who organized the demonstration, and the viewpoint you advocated.

51. Have you expressed a public opinion about gay rights?

52. Do you consider yourself to be gay, lesbian or bisexual?

53. Do you have any family members or friends who are gay, lesbian or bisexual?

54. Do you believe the government should provide special protection or rights to gays, lesbians or bisexuals, including, but not limited to, the right to same sex marriage?

55. Do you believe homosexuality is a sin?

56. Do you believe churches should preach or teach against homosexuality?

57. Do you believe people have the right to publicly condemn or disagree with homosexuality?

58. What is your opinion about psychologists and psychiatrists?

59. Do you understand the difference between the education and training of a psychiatrist and a psychologist?

60. Do you believe that people can disagree with the psychiatric profession on religious grounds?

61. Have you ever heard of Westboro Baptist Church in Topeka, Kansas? If so, what is your view of that church?

62. Have you ever heard of Fred Phelps, Sr., a pastor in Topeka, Kansas? What is your view of Pastor Phelps?

63. Have you heard of the picketers who protest outside of soldiers' funerals? What is your view of those picketers?

64. Have you heard of Judge Richard Bennett, either as a political candidate or judge?

If so, what is your view of Richard Bennett?

65. Have you heard of Albert Snyder?

If so, what is your view of Albert Snyder?

66. Have you heard of an organization called the Patriot Guard?

If so, what is your view of the Patriot Guard?

67. Have you been involved in any legal proceeding as a party?

68.

If so, what kind of case was it, what was your status in the proceeding, and what was the outcome?

69. Have you been involved in any legal proceeding as a witness?

If so, what kind of case was it, and what was your role?

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ALBERT SNYDER

*

vs.

*

CIVIL NO. RDB 06-1389

*

FRED W. PHELPS, SR., et al.

*

COURT'S JURY QUESTIONNAIRE

1. Have you or someone you know participated in any protest concerning the wars in Afghanistan or Iraq?
Yes _____; No _____
2. Have you or a family member ever observed a funeral being protested?
Yes _____; No _____
3. Do you or does someone you know suffer from diabetes?
Yes _____; No _____
4. Would you, if the law and facts supported such a verdict, hesitate to return a verdict against a church?
Yes _____; No _____
5. Do you believe unpopular speech is covered or protected by the First Amendment?
Yes _____; No _____

6. Do you believe people have the right to engage in speech that you consider offensive?

Yes _____; No _____

7. Have you ever protested the government, any branch, at any level?

Yes _____; No _____

If Yes, why and when?

8. Have you ever engaged in a protest, demonstration or picket?

Yes _____; No _____

If Yes, when, where and about what?

9. Have you ever been divorced?

Yes _____; No _____

10. What is your marital status? _____

11. Do you believe people should be allowed to protest about the war, for or against?

Yes _____; No _____

12. Are you a member of the military?

Yes _____; No _____

13. Are you a member of the National Guard?

Yes _____; No _____

14. Have you been a member of the military in the past?

Yes _____; No _____

15. Have you been a member of the National Guard in the past?

Yes _____; No _____

16. Are you a veteran?

Yes _____; No _____

17. Do you have a member of your family or friend who is currently in the military?

Yes _____; No _____

18. Do you have a family member or friend who was in the past an active member of the military?

Yes _____; No _____

19. Do you have a family member or friend who is a veteran of war?

Yes _____; No _____

20. Do you have a family member or friend who is currently in the National Guard?

Yes _____; No _____

21. Have you ever participated in a demonstration or protest about the war?

Yes _____; No _____

22. Have you been involved in an legal proceeding as a party?

Yes _____; No _____

If yes, what kind of case, what was your status and what was the outcome?

23. Have you been involved in any legal proceeding as a witness?

Yes _____; No _____

If yes, what kind of case and what was your role?

Name: _____

Juror No.: _____