

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
WESTERN DIVISION**

SHANNON M. PETERS,

Plaintiff,

vs.

MICHELLE RISDAL, LEE
BLANCHARD, JONATHAN
HATFIELD, and CARLOS LUCERO,

Defendants.

No. C 12-4070-MWB

VERDICT FORM

On Ms. Peters's claims of constitutional violations, we, the Jury, find as follows:

I. "EXCESSIVE FORCE"	
Step 1: Verdict	<p>On Ms. Peters's "excessive force" claim, as explained in Instruction No. 5, in whose favor do you find? <i>(If you find in favor of the Defendant Officers on this claim, then do not answer any further questions in the Verdict Form. Instead, notify the Court Security Officer (CSO) that you have reached a verdict. On the other hand, if you find in favor of Ms. Peters, go on to consider the additional steps in Part I and also enter your verdict on Ms. Peters' "free speech retaliation" claim in Part II.)</i></p> <p style="text-align: center;"> <input type="checkbox"/> Ms. Peters <input checked="" type="checkbox"/> The Defendant Officers </p>
Step 2: Defendant Officers Found Liable	<p>On Ms. Peters's "excessive force" claim, as explained in Instruction No. 5, which one or more of the Defendant Officers do you find used "excessive force"?</p> <p><input type="checkbox"/> Officer Michelle Risdal</p> <p><input type="checkbox"/> Sergeant Lee Blanchard</p> <p><input type="checkbox"/> Officer Johnathan Hatfield</p> <p><input type="checkbox"/> Officer Carlos Lucero</p>

<p>Step 3: Compensatory Damages</p>	<p><i>If you found in favor of Ms. Peters on her "excessive force" claim in Step 1, what amount, if any, do you award for each of the following items of damages, as compensatory damages are explained in Instruction No. 8?</i></p>	
	<p>Past physical pain and suffering:</p>	<p>\$ _____</p>
	<p>Past mental pain and suffering or emotional distress:</p>	<p>\$ _____</p>
	<p>Future mental pain and suffering or emotional distress:</p>	<p>\$ _____</p>
	<p>Total Compensatory Damages</p>	<p>\$ _____</p>
<p>Step 4: Nominal Damages</p>	<p><i>If you found in favor of Ms. Peters on her "excessive force" claim in Step 1, but you find that she has failed to prove "compensatory damages" as defined in Instruction No. 8, then you must award "nominal damages" not exceeding \$1.00, as explained in Instruction No. 9. (Do not award "nominal damages" if you award any "compensatory damages" on this claim.)</i></p>	
	<p>Nominal damages:</p>	<p>\$ _____</p>
<p>Step 5: Punitive Damages</p>	<p><i>If you found in favor of Ms. Peters on her "excessive force" claim, what amount, if any, do you award for "punitive damages," as such damages are explained in Instruction No. 10, against each Defendant Officer found liable for "excessive force" in Step 2? (Do not award punitive damages against any Defendant Officers that you did not find liable in Step 2.)</i></p>	
	<p>\$ _____ for punitive damages for "excessive force" against Officer Michelle Risdal</p>	
	<p>\$ _____ for punitive damages for "excessive force" against Sergeant Lee Blanchard</p>	
	<p>\$ _____ for punitive damages for "excessive force" against Officer Jonathan Hatfield</p>	
	<p>\$ _____ for punitive damages for "excessive force" against Officer Carlos Lucero</p>	

II. "FREE SPEECH RETALIATION"	
Step 1: Verdict	On Ms. Peters's "free speech retaliation" claim, as explained in Instruction No. 6, in whose favor do you find? <i>(If you find in favor of the Defendant Officers on this claim, then do not answer any further questions in the Verdict Form. Instead, notify the Court Security Officer (CSO) that you have reached a verdict. On the other hand, if you find in favor of Ms. Peters on this claim, go on to consider the remaining steps in this part of the Verdict Form.)</i>
	<input type="checkbox"/> Ms. Peters <input type="checkbox"/> The Defendant Officers
Step 2: Defendant Officers Found Liable	On Ms. Peters's "free speech retaliation" claim, as explained in Instruction No. 6, which one or more of the Defendant Officers do you find liable for "free speech retaliation"?
	<input type="checkbox"/> Officer Michelle Risdal
	<input type="checkbox"/> Sergeant Lee Blanchard
	<input type="checkbox"/> Officer Johnathan Hatfield
	<input type="checkbox"/> Officer Carlos Lucero
Step 3: Compensatory Damages	<i>If you found in favor of Ms. Peters on her "free speech retaliation" claim in Step 1, what additional amount, if any, do you award for each of the following items of damages, over and about the amounts awarded in Step 3 of Part I for compensatory damages for "excessive force," as compensatory damages are explained in Instruction No. 8?</i>
	<i>Additional past physical pain and suffering:</i> \$ _____
	<i>Additional past mental pain and suffering or emotional distress:</i> \$ _____
	<i>Additional future mental pain and suffering or emotional distress:</i> \$ _____
	Total Additional Compensatory Damages \$ _____

<p>Step 4: Nominal Damages</p>	<p><i>If you found in favor of Ms. Peters on her "free speech retaliation" claim in Step 1, but you find that she has failed to prove "compensatory damages" as defined in Instruction No. 8, then you must award "nominal damages" not exceeding \$1.00, as explained in Instruction No. 9. (Do not award "nominal damages" if you award any "compensatory damages" on this claim.)</i></p>	
	<p>Nominal damages:</p>	<p>\$ _____</p>
<p>Step 5: Punitive Damages</p>	<p><i>If you found in favor of Ms. Peters on her "free speech retaliation" claim, what additional amount, if any, do you award for "punitive damages," over and about the amounts awarded in Step 5 of Part I for punitive damages for "excessive force," as punitive damages are explained in Instruction No. 10, against each Defendant Officer found liable for "free speech retaliation" in Step 2? (Do not award punitive damages against any Defendant Officers that you did not find liable in Step 2.)</i></p>	
	<p>\$ _____ for additional punitive damages for "free speech retaliation" against Officer Michelle Risdal</p>	
	<p>\$ _____ for additional punitive damages for "free speech retaliation" against Sergeant Lee Blanchard</p>	
	<p>\$ _____ for additional punitive damages for "free speech retaliation" against Officer Jonathan Hatfield</p>	
	<p>\$ _____ for additional punitive damages for "free speech retaliation" against Officer Carlos Lucero</p>	

12-19-13

Date

Ben Kamm

Foreperson

John McEoy

Juror

Matthew R. Jones

Juror

Demetrius L. Anderson

Juror

Jayce D. Hurd

Juror

Marty Cross

Juror

Dennis Rainaldi

Juror

Be Able

Juror