

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

ELISABETH EPPS, *et al.*,  
  
Plaintiffs,  
  
v.  
  
CITY AND COUNTY OF DENVER, *et al.*,  
  
Defendants,

Civil Action Nos. 1:20-cv-1878-RBJ &  
1:20-cv-1922-RBJ-MEH (consol.)

VERDICT FORM

We, the jury, upon our oaths, find and state as follows:

**Plaintiff Claire Sannier**

1. Did Claire Sannier prove a violation of her First or Fourth Amendment rights?

Yes  No

*If yes, continue to Question 2. If no, skip to Question 4.*

2. Is Denver liable for violating Claire Sannier’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

*Check all that apply. If none apply, do not check any boxes.*

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fourth Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

*If you checked any boxes above, continue to Question 3. If not, skip to Question 4.*

3. What amount of compensatory damages do you award to Claire Sannier?

\$ 1M

**Plaintiff Stanford Smith**

4. Did Stanford Smith prove a violation of his First or Fourth Amendment rights?

Yes  No

*If yes, continue to Question 5. If no, skip to Question 7.*

5. Is Denver liable for violating Stanford Smith’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

*Check all that apply. If none apply, do not check any boxes.*

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fourth Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

*If you checked any boxes above, continue to Questions 6. If not, skip to Question 7.*

6. What amount of compensatory damages do you award to Stanford Smith?

\$ 1m

**Plaintiff Zachary Packard**

7. Did Zachary Packard prove a violation of his First or Fourth Amendment rights?

Yes  No

*If yes, continue to Question 8. If no, skip to next Question 11.*

8. Is Denver liable for violating Zachary Packard’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

*Check all that apply. If none apply, do not check any boxes.*

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fourth Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

9. Do you find that any officer from a mutual aid jurisdiction violated Zachary Packard’s constitutional rights while acting pursuant to an official policy, or a practice or custom of Denver as explained in Jury Instruction 18?

Yes X No     

If you checked any boxes in Questions 8 or 9, continue to Question 10. If not, skip to Question 11.

10. What amount of compensatory damages do you award to Zachary Packard?

\$ 3m

**Plaintiff Sara Fitouri**

11. Did Sara Fitouri prove a violation of her First or Fourth Amendment rights?

Yes X No     

If yes, continue to question 12. If no, skip to Question 14.

12. Is Denver liable for violating Sara Fitouri’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

Check all that apply. If none apply, do not check any boxes.

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	<u>X</u>	<u>X</u>	<u>X</u>
Fourth Amendment	<u>X</u>	<u>X</u>	<u>X</u>

If you checked any boxes above, continue to Question 13. If not, skip to Question 14.

13. What amount of compensatory damages do you award to Sara Fitouri?

\$ 1m

**Plaintiff Maya Rothlein**

14. Did Maya Rothlein prove a violation of her First or Fourth Amendment rights?

Yes X No     

If yes, continue to question 15. If no, skip to Question 17.

15. Is Denver liable for violating Maya Rothlein’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

Check all that apply. If none apply, do not check any boxes.

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fourth Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

If you checked any boxes above, continue to Question 16. If not, skip to Question 17.

16. What amount of compensatory damages do you award to Maya Rothlein?

\$ 1M

**Plaintiff Amanda Blasingame**

17. Did Amanda Blasingame prove a violation of her First or Fourth Amendment rights?

Yes  No

If yes, continue to question 18. If no, skip to Question 20.

18. Is Denver liable for violating Amanda Blasingame’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

Check all that apply. If none apply, do not check any boxes.

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fourth Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

If you checked any boxes above, continue to Question 19. If not, skip to Question 20.

19. What amount of compensatory damages do you award to Amanda Blasingame?

\$ 1M

**Plaintiff Joe Deras**

20. Did Joe Deras prove a violation of his First or Fourth Amendment rights?

Yes X No    

*If yes, continue to question 21. If no, skip to Question 24.*

21. Is Denver liable for violating Joe Deras’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

*Check all that apply. If none apply, do not check any boxes.*

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	<u>X</u>	<u>X</u>	<u>X</u>
Fourth Amendment	<u>X</u>	<u>X</u>	<u>X</u>

22. Do you find that any officer from a mutual aid jurisdiction violated Joe Deras’s constitutional rights while acting pursuant to an official policy, or a practice or custom of Denver as explained in Jury Instruction 18?

Yes X No    

*If you checked any boxes in Questions 21 or 22, continue to Question 23. If not, skip to Question 24.*

23. What amount of compensatory damages do you award to Joe Deras?

\$           1 M          

**Plaintiff Kelsey Taylor**

24. Did Kelsey Taylor prove a violation of her First or Fourth Amendment rights?

Yes X No    

*If yes, continue to question 25. If no, skip to Question 27.*

25. Is Denver liable for violating Kelsey Taylor’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

Check all that apply. If none apply, do not check any boxes.

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	X	X	X
Fourth Amendment	X	X	X

If you checked any boxes above, continue to Question 26. If not, skip to Question 27.

26. What amount of compensatory damages do you award to Kelsey Taylor?

\$ 1M

**Plaintiff Ashlee Wedgeworth**

27. Did Ashlee Wedgeworth prove a violation of her First or Fourth Amendment rights?

Yes X No    

If yes, continue to question 28. If no, skip to Question 30.

28. Is Denver liable for violating Ashlee Wedgeworth’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

Check all that apply. If none apply, do not check any boxes.

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	X	X	X
Fourth Amendment			

If you checked any boxes above, continue to Question 29. If not, skip to Question 30.

29. What amount of compensatory damages do you award to Ashlee Wedgeworth?

\$ 750,000

**Plaintiff Jacquelyn Parkins**

30. Did Jacquelyn Parkins prove a violation of her First or Fourth Amendment rights?

Yes  No

*If yes, continue to question 31. If no, skip to Question 33.*

31. Is Denver liable for violating Jacquelyn Parkins’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

*Check all that apply. If none apply, do not check any boxes.*

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fourth Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

*If you checked any boxes above, continue to Question 32. If not, skip to Question 33.*

32. What amount of compensatory damages do you award to Jacquelyn Parkins?

\$ 1m

**Plaintiff Elisabeth Epps**

33. Did Elisabeth Epps prove a violation of her First or Fourth Amendment rights?

Yes  No

*If yes, continue to question 34. If no, skip to Question 36.*

34. Is Denver liable for violating Elisabeth Epps’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

*Check all that apply. If none apply, do not check any boxes.*

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fourth Amendment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

35. Did Plaintiff Elisabeth Epps prove, by a preponderance of the evidence, her claims against Jonathan Christian? (Check "Yes" or "No" for each claim.)

Claim	Yes	No
First Amendment		X
Fourth Amendment	X	

If you checked any boxes in Question 34 or if you selected "Yes" for any claim in Question 35, proceed to Questions 35.a and 35.b below. If not, skip ahead to Question 36.

35.a. What amount of compensatory damages do you award to Elisabeth Epps?

\$ 1 m

35.b. What amount of punitive damages do you award to Elisabeth Epps against Jonathan Christian?

\$ 250,000



**Plaintiff Hollis Lyman**

36. Did Hollis Lyman prove a violation of her First or Fourth Amendment rights?

Yes X No    

*If yes, continue to question 37. If no, skip Questions 37 and 38 and sign and date this form if you have completed all the sections above.*

37. Is Denver liable for violating Hollis Lyman’s First or Fourth Amendment rights under any of the following theories as explained in Jury Instructions 15, 16 and 17?

*Check all that apply. If none apply, do not check any boxes.*

Claim	Policy/Practice/Custom (Instruction 15)	Failure to Train (Instruction 16)	Ratification (Instruction 17)
First Amendment	<u>X</u>	<u>X</u>	<u>X</u>
Fourth Amendment	<u>X</u>	<u>X</u>	<u>X</u>

*If you checked any boxes above, continue to Question 38.*

38. What amount of compensatory damages do you award to Hollis Lyman?

\$ 1m

*The Foreperson must sign and date this Verdict Form and then give a note to the Bailiff stating that you have reached a verdict. But do not give this Verdict Form to the Bailiff.*

March 25, 2022  
DATE

JUROR NAME REDACTED

SIGNATURE OF FOREPERSON

JUROR NAME REDACTED

NAME OF FOREPERSON