

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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E. JEAN CARROLL,

Plaintiff,

-against-

22-cv-10016 (LAK)

DONALD J. TRUMP,

Defendant.  
----- x

**VERDICT FORM**

**Battery**

**Did Ms. Carroll prove, by a preponderance of the evidence, that**

1. Mr. Trump raped Ms. Carroll?

YES \_\_\_\_\_ NO \_\_\_\_\_

*[If you answered "Yes," skip to Question 4. If you answered "No," continue to Question 2.]*

2. Mr. Trump sexually abused Ms. Carroll?

YES \_\_\_\_\_ NO \_\_\_\_\_

*[If you answered "Yes," skip to Question 4. If you answered "No," continue to Question 3.]*

3. Mr. Trump forcibly touched Ms. Carroll?

YES \_\_\_\_\_ NO \_\_\_\_\_

*[If you answered "Yes," continue to Question 4. If you answered "No," skip to Question 6.]*

4. Ms. Carroll was injured as a result of Mr. Trump's conduct?

YES \_\_\_\_\_ NO \_\_\_\_\_

If "Yes," insert a dollar amount that would fairly and adequately compensate her for that injury or those injuries.

\$ \_\_\_\_\_

If “No,” insert \$1.

\$ \_\_\_\_\_

*[Continue to Question 5, whether you answered “Yes” or “No.”]*

- 5. Mr. Trump’s conduct was willfully or wantonly negligent, reckless, or done with a conscious disregard of the rights of Ms. Carroll, or was so reckless as to amount to such disregard?

YES \_\_\_\_\_ NO \_\_\_\_\_

If “Yes,” how much, if any, should Mr. Trump pay to Ms. Carroll in punitive damages?

\$ \_\_\_\_\_

*[Continue to Question 6, whether you answered “Yes” or “No.”]*

**Defamation**

**Did Ms. Carroll prove, by a preponderance of the evidence, that**

- 6. Mr. Trump’s statement was defamatory?

YES \_\_\_\_\_ NO \_\_\_\_\_

*[If you answered “Yes,” continue to Question 7. If you answered “No,” stop here and return your verdict.]*

**Did Ms. Carroll prove, by clear and convincing evidence, that**

- 7. Mr. Trump’s statement was false?

YES \_\_\_\_\_ NO \_\_\_\_\_

*[If you answered “Yes,” continue to Question 8. If you answered “No,” stop here and return your verdict.]*

- 8. Mr. Trump made the statement with actual malice?

YES \_\_\_\_\_ NO \_\_\_\_\_

*[If you answered “Yes,” continue to Question 9. If you answered “No,” stop here and return your verdict.]*

**Did Ms. Carroll prove, by a preponderance of the evidence, that**

- 9. Ms. Carroll was injured as a result of Mr. Trump’s publication of the October 12, 2022 statement?

YES \_\_\_\_\_ NO \_\_\_\_\_

If “Yes,” insert a dollar amount for any damages other than the reputation repair program.

\$ \_\_\_\_\_

If “Yes,” insert a dollar amount for any damages for the reputation repair program only.

\$ \_\_\_\_\_

If “No,” insert \$1.

\$ \_\_\_\_\_

*[Continue to Question 10, whether you answered “Yes” or “No.”]*

- 10. In making the statement, Mr. Trump acted maliciously, out of hatred, ill will, spite or wanton, reckless, or willful disregard of the rights of another?

YES \_\_\_\_\_ NO \_\_\_\_\_

If “Yes,” how much, if any, should Mr. Trump pay to Ms. Carroll in punitive damages?

\$ \_\_\_\_\_

*[Please write your juror number (not your seat number or name) in the space provided below, fill in the date, and inform the officer that you have reached a verdict.]*

Dated: \_\_\_\_\_, 2023

Juror numbers:

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