

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
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 you 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:
