

ORIGINAL

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

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DATE 9-22-2013
Elizabeth Thomas
DEPUTY CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA

CALVIN RICHARDSON and
DENISE RICHARDSON,
Plaintiffs,

-vs-

CASE NO. 4:11-CV-124

COREY MASON,

Defendant.

VERDICT
AND SPECIAL INTERROGATORIES TO THE JURY

Denise Richardson's Claim

Do you find from a preponderance of the evidence:

1. That the Defendant intentionally committed acts that violated Denise Richardson's federal constitutional right not to be subjected to an unreasonable search?

Answer Yes or No YES

2. That the Defendant's acts were the proximate or legal cause of damages sustained by Denise Richardson?

Answer Yes or No YES

[Note: If you answered "No" to either Question 1 or 2, skip Question 3 and go to Question 4.]

3. That Denise Richardson should be awarded damages to compensate her?

Answer Yes or No YES

If your answer is Yes, in what amount? \$ 2.5 million

Calvin Richardson's Claim

Do you find from a preponderance of the evidence:

4. That the Defendant intentionally committed acts that violated Calvin Richardson's federal constitutional right not to be subjected to an unreasonable search?

Answer Yes or No YES

5. That the Defendant's acts were the proximate or legal cause of damages sustained by Calvin Richardson?

Answer Yes or No YES

[Note: If you answered "No" to either Question 4 or 5, skip Question 6 and go to "Special Interrogatories" on page 3.]

6. That Calvin Richardson should be awarded damages to compensate him regarding the search of his person?

Answer Yes or No YES

If your answer is Yes, in what amount? \$ 2.5 million

SPECIAL INTERROGATORIES

Denise Richardson's Claim

If you found in favor of Denise Richardson on her claim and awarded her compensatory damages, answer the following questions "Yes" or "No." If you found in favor of Defendant Corey Mason on Denise Richardson's claim and awarded no compensatory damages to Denise Richardson, skip Questions 1-11 below and go to the section entitled "Calvin Richardson's Claim" that starts on page 6.

1. Did Defendant Corey Mason direct Tammye Atkinson to search under Denise Richardson's clothing? YES
2. Could Defendant Corey Mason's instructions to Tammye Atkinson reasonably be interpreted to include directions to search Denise Richardson's vaginal and/or rectal areas? YES
3. Did Defendant Corey Mason have a reasonable suspicion that Denise Richardson had illegal drugs hidden under her clothing in the areas that he directed she be searched? YES

For the purposes of this question, "reasonable suspicion" means that the specific facts and circumstances known to Corey Mason, together with reasonable inferences from those facts and circumstances, would justify a reasonably prudent officer to believe

that Denise Richardson had illegal drugs hidden under her clothing in the areas that he directed she be searched.

4. Did Tammye Atkinson search for illegal drugs under Denise Richardson's clothing? YES

5. During her search of Denise Richardson, did Tammye Atkinson view any parts of Denise Richardson's body that were covered with clothing before Atkinson began her search? YES

6. If the answer to the preceding question was "Yes," state the parts of Denise Richardson's body that were covered with clothing before the search and that Tammye Atkinson visually inspected during the search?

BREASTS

7. During her search of Denise Richardson, did Tammye Atkinson physically touch Denise Richardson's body? YES

8. During her search of Denise Richardson, did Tammye Atkinson probe Denise Richardson's vaginal area? NO

9. During her search of Denise Richardson, did Tammye Atkinson probe Denise Richardson's rectal area? NO

10. During her search of Denise Richardson, did Tammye Atkinson touch Denise Richardson's unclothed breast area? NO
11. Did Tammye Atkinson's search of Denise Richardson last more than five minutes? NO

Calvin Richardson's Claim

If you found in favor of Calvin Richardson on his claim and awarded him compensatory damages, answer the following questions "Yes" or "No." If you found in favor of Corey Mason on Calvin Richardson's claim against him, skip Questions 1-9 below and have your foreperson sign and date the verdict form in the place indicated.

1. Did Defendant Corey Mason search for illegal drugs under Calvin Richardson's clothing? YES
2. During his search of Calvin Richardson, did Corey Mason view any parts of Calvin Richardson's body that were covered with clothing before Mason began his search? YES
3. If the answer to the preceding question was "Yes," state the parts of Calvin Richardson's body that were covered with clothing before the search and that Corey Mason visually inspected during the search?
BUTTOCKS, GROIN (TESTICLES)

4. Did Defendant Corey Mason have a reasonable suspicion that Calvin Richardson had drugs hidden in the areas of his person that Mason searched? YES

