

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

CHRISTOPHER HAMLIN,

Plaintiff,

DRAFT
SPECIAL VERDICT

v.

13-cv-202-jdp

JASON WENZEL, MATTHEW BURNS,
SCOTT ROSS, ANTHONY LO BIANCO,
and DEREK SCHOUTEN,

Defendants.

We, the jury, for our special verdict, find as follows:

Question No. 1: On January 1, 2013, did defendant Jason Wenzel violate plaintiff Christopher Hamlin’s Eighth Amendment rights by authorizing a staff-assisted strip search of plaintiff?

Answer: _____
(Yes or No)

If you answered “Yes” to Question No. 1, answer Question No. 2.

If you answered “No” to Question No. 1, do not answer Questions 2-4. Move on to Question No. 5.

Question No. 2: What amount of money, if any, will fully and fairly compensate plaintiff Hamlin for the harm caused by defendant Wenzel by authorizing the staff-assisted strip search?

\$ _____

No matter how you answered Question No. 2, answer Question No. 3.

Question No. 3: By authorizing the staff-assisted strip search, did defendant Wenzel act in a way that entitles plaintiff Hamlin to punitive damages?

Answer: _____
(Yes or No)

If you answered to “Yes” to Question No. 3, answer Question No. 4.
If you answered “No” to Question No. 3, do not answer Question No. 4.

Question No. 4: What amount of money, if any, do you award as punitive damages?

\$ _____

No matter how you answered Questions 1-4, answer Question No. 5.

Question No. 5: On January 1, 2013, did defendant Anthony Lo Bianco violate plaintiff Hamlin’s Eighth Amendment rights in performing the strip search?

Answer: _____
(Yes or No)

If you answered “Yes” to Question No. 5, answer Question No. 6.
If you answered “No” to Question No. 5, do not answer Questions 6-8. Move on to Question No. 9.

Question No. 6: What amount of money, if any, will fully and fairly compensate plaintiff Hamlin for the harm caused by defendant Lo Bianco in performing the strip search?

\$ _____

No matter how you answered Question No. 6, answer Question No. 7.

Question No. 7: In performing the strip search, did defendant Lo Bianco act in a way that entitles plaintiff Hamlin to punitive damages?

Answer: _____
(Yes or No)

If you answered to “Yes” to Question No. 7, answer Question No 8.
If you answered “No” to Question No. 7, do not answer Question No. 8.

Question No. 8: What amount of money, if any, do you award as punitive damages?

\$ _____

If you answered to “Yes” to either Question No. 1 or Question No. 5, answer Question No 9.
If you answered “No” to Questions 1 and 5, do not answer any more questions.

Question No. 9: On January 1, 2013, did any of the following defendants violate plaintiff Hamlin’s Eighth Amendment rights by failing to intervene during the strip search?

Defendant Jason Wenzel: _____
(Yes or No)

Defendant Scott Ross: _____
(Yes or No)

Defendant Matthew Burns: _____
(Yes or No)

Defendant Derek Schouten: _____
(Yes or No)

If you answered “Yes” to Question No. 9 for any of the defendants, answer Question No. 10 for those defendants.
If you answered “No” to Question No. 9 for all defendants, do not answer any more questions.

Question No. 10: What amount of money, if any, will fully and fairly compensate plaintiff Hamlin for the harm caused by the following defendants by failing to intervene?

Defendant Jason Wenzel: \$ _____

Defendant Scott Ross: \$ _____

Defendant Matthew Burns: \$ _____

Defendant Derek Schouten: \$ _____

No matter how you answered Question No. 10, answer Question No. 11.

Question No. 11: By failing to intervene, did any of the following defendants act in a way that entitles plaintiff Hamlin to punitive damages?

Defendant Jason Wenzel: _____
(Yes or No)

Defendant Scott Ross: _____
(Yes or No)

Defendant Matthew Burns: _____
(Yes or No)

Defendant Derek Schouten: _____
(Yes or No)

If you answered to “Yes” to Question No. 11, for any of the defendants, answer Question No. 12 for those defendants.

If you answered “No” to Question No. 11 for all defendants, do not answer any more questions.

Question No. 12: What amount of money, if any, do you award as punitive damages?

Defendant Jason Wenzel: \$ _____

Defendant Scott Ross: \$ _____

Defendant Matthew Burns: \$ _____

Defendant Derek Schouten: \$ _____

Presiding Juror

Madison, Wisconsin

Date: _____