

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

THOMAS J. GOOD,

Plaintiff,

v.

SPECIAL VERDICT

[8/23/19 DRAFT]

NATHAN ADAMS, GREG CISNEROS,
and CITY OF БЕЛОIT,

18-cv-461-jdp

Defendants.

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

QUESTION 1: Did defendant Nathan Adams violate plaintiff Thomas Good’s Fourth Amendment rights by forcing him to submit to a blood draw?

_____ (Yes or No)

If you answered YES to Question 1, answer Questions 2, 3, 4, and 5. If you answered NO to Question 1, STOP and do not answer any more questions.

QUESTION 2: Did defendant Greg Cisneros violate plaintiff Thomas Good’s Fourth Amendment rights by failing to intervene to prevent the blood draw?

_____ (Yes or No)

If you answered YES to Question 1, answer Question 3.

QUESTION 3: Did the City of Beloit’s policy regarding warrantless blood draws cause the forced draw of plaintiff Thomas Good’s blood?

_____ (Yes or No)

If you answered YES to Question 1, answer Question 4.

QUESTION 4: What amount of money, if any, would fairly and adequately compensate plaintiff Thomas Good for the harm caused by the violation of his constitutional rights?

ANSWER: \$ _____

If you answered YES to Question 1, answer Question 5.

QUESTION 5: Did either defendant act in malicious or reckless disregard of plaintiff Thomas Good's constitutional rights?

Nathan Adams _____ (Yes or No)

Greg Cisneros _____ (Yes or No)

If you answered YES to Question 5 as to any defendant, answer Question 6. But only answer Question 6 as to those defendants for whom you answered YES to Question 5. If you answer NO to Question 5 for all defendants, STOP and do not answer any more questions.

QUESTION 6: What amount of money, if any, do you award as punitive damages against the following defendants?

Nathan Adams \$ _____

Greg Cisneros \$ _____

Presiding Juror

Madison, Wisconsin

Date: _____