

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:20-cv-01936-STV

TIMOTHY JAMES COATES,
GENE CLAPS,
MARK MITCHELL, and
KEVIN CURRIER,

Plaintiffs,

v.

THE BOARD OF COUNTY COMMISSIONERS FOR THE COUNTY OF ADAMS,

Defendant.

VERDICT FORM

We, the jury, present our Answers to Questions submitted by the Court, to which we have unanimously agreed:

I. Mr. Coates' Claim Against Defendant

Question No. 1: Did Mr. Coates establish the third element of his claim for "First Amendment Retaliation – Political Affiliation" by proving by a preponderance of the evidence that one or more of his political beliefs, activities, or associations was a motivating factor in Mr. Reigenborn's decision to discharge him, as set forth in Instruction No. 14?

Yes No

If you answered "Yes" to Question 1, please proceed to Question 2. If you answered "No" to Question 1, please do not answer Question 2 and your verdict is for Defendant on this claim.

Question No. 2: Did Defendant prove by a preponderance of the evidence that political loyalty to Mr. Reigenborn was an appropriate requirement for the effective performance of the position Mr. Coates held, as set forth in Instruction No. 16?

Yes No

If you answered "Yes" to Question 2, your verdict is for Defendant on this claim. If you answered "No" to Question 2, your verdict is for Mr. Coates on this claim. Please proceed to the next question.

II. Mr. Coates' Damages

If your verdict was for Mr. Coates on the claim above, proceed to Questions 3 and 4 below. If your verdict was for Defendant on the claim above, skip Question 3 and Question 4 and proceed to Question 5.

Question No. 3: What is the amount of backpay damages you find Mr. Coates incurred as a result of Defendant's conduct?

\$ ~~523,062.90~~ 523,062.90

Question No. 4: What is the amount of emotional distress damages you find Mr. Coates incurred as a result of Defendant's conduct?

\$ 818,750

III. Mr. Claps' Claim Against Defendant

Question No. 5: Did Mr. Claps establish the third element of his claim for "First Amendment Retaliation – Political Affiliation" by proving by a preponderance of the evidence that one or more of his political beliefs, activities, or associations was a motivating factor in Mr. Reigenborn's decision to discharge him, as set forth in Instruction No. 14?

Yes No

If you answered "Yes" to Question 5, please proceed to Question 6. If you answered "No" to Question 5, please do not answer Question 6 and your verdict is for Defendant on this claim.

Question No. 6: Did Defendant prove by a preponderance of the evidence that political loyalty to Mr. Reigenborn was an appropriate requirement for the effective performance of the position Mr. Claps held, as set forth in Instruction No. 16?

Yes No

If you answered "Yes" to Question 6, your verdict is for Defendant on this claim. If you answered "No" to Question 6, your verdict is for Mr. Claps on this claim. Please proceed to the next question.

IV. Mr. Claps' Damages

If your verdict was for Mr. Claps on the claim above, proceed to Questions 7 and 8 below. If your verdict was for Defendant on the claim above, skip Question 7 and Question 8 and proceed to Question 9.

Question No. 7: What is the amount of backpay damages you find Mr. Claps incurred as a result of Defendant's conduct?

\$ 523,898.17

Question No. 8: What is the amount of emotional distress damages you find Mr. Claps incurred as a result of Defendant's conduct?

\$ 818,750

V. Mr. Mitchell's Claim Against Defendant

Question No. 9: Did Mr. Mitchell establish the third element of his claim for "First Amendment Retaliation – Political Affiliation" by proving by a preponderance of the evidence that one or more of his political beliefs, activities, or associations was a motivating factor in Mr. Reigenborn's decision to discharge him, as set forth in Instruction

No. 14?

Yes No

If you answered "Yes" to Question 9, please proceed to Question 10. If you answered "No" to Question 9, please do not answer Question 10 and your verdict is for Defendant on this claim.

Question No. 10: Did Defendant prove by a preponderance of the evidence that political loyalty to Mr. Reigenborn was an appropriate requirement for the effective performance of the position Mr. Mitchell held, as set forth in Instruction No. 16?

Yes No

If you answered "Yes" to Question 10, your verdict is for Defendant on this claim. If you answered "No" to Question 10, your verdict is for Mr. Mitchell on this claim. Please proceed to the next question.

VI. Mr. Mitchell's Damages

If your verdict was for Mr. Mitchell on the claim above, proceed to Questions 11 and 12 below. If your verdict was for Defendant on the claim above, skip Question 11 and Question 12 and proceed to Question 13.

Question No. 11: What is the amount of backpay damages you find Mr. Mitchell incurred as a result of Defendant's conduct?

\$ 301,308.93

Question No. 12: What is the amount of emotional distress damages you find Mr. Mitchell incurred as a result of Defendant's conduct?

\$ 818,750

VII. Mr. Currier's Claim Against Defendant

Question No. 13: Did Mr. Currier establish the third element of his claim for "First Amendment Retaliation – Political Affiliation" by proving by a preponderance of the evidence that one or more of his political beliefs, activities, or associations was a motivating factor in Mr. Reigenborn's decision to discharge him, as set forth in Instruction No. 14?

Yes No

If you answered "Yes" to Question 13, please proceed to Question 14. If you answered "No" to Question 13, please do not answer Question 14 and your verdict is for Defendant on this claim.

Question No. 14: Did Defendant prove by a preponderance of the evidence that political loyalty to Mr. Reigenborn was an appropriate requirement for the effective performance of the position Mr. Currier held, as set forth in Instruction No. 16?

Yes No

If you answered "Yes" to Question 14, your verdict is for Defendant on this claim. If you answered "No" to Question 14, your verdict is for Mr. Currier on this claim. Please proceed to the next question.

VIII. Mr. Currier's Damages

If your verdict was for Mr. Currier on the claim above, proceed to Questions 15 and 16 below. If your verdict was for Defendant the claim above, skip Question 15 and Question 16 and sign the verdict form

Question No. 15: What is the amount of backpay damages you find Mr. Currier incurred as a result of Defendant's conduct?

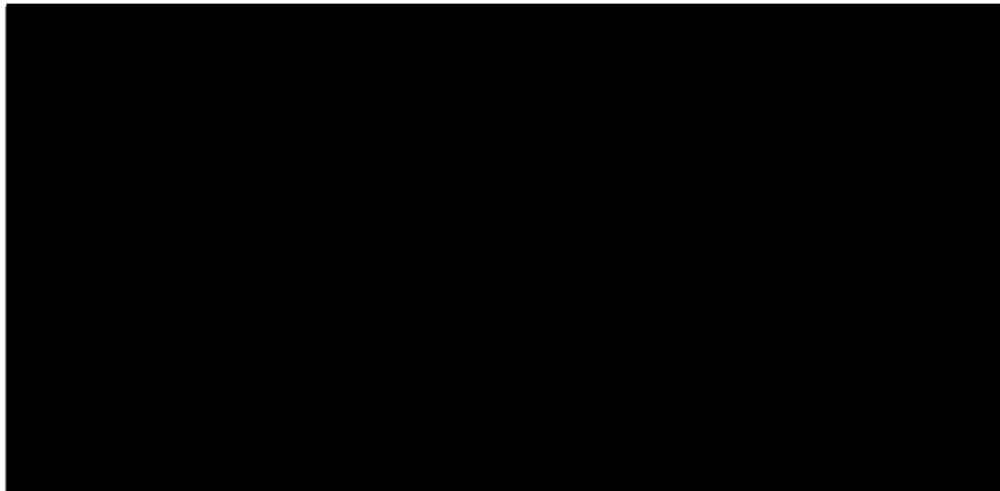
\$ 371,470.21

Question No. 16: What is the amount of emotional distress damages you find Mr. Carrier incurred as a result of Defendant's conduct?

\$ 818,750

IX. Certification

By our signatures and answers herein, we represent that the answers on this form represent the unanimous verdict of the jury.



Dated this 28 day of January, 2025.