

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
DEMOCRACY PARTNERS, LLC, <u>et al.</u> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 17-1047 (PLF)
)	
PROJECT VERITAS ACTION FUND, <u>et al.</u> ,)	
)	
Defendants.)	
_____)	

VERDICT FORM



Wiretapping Claims—The Conference Room Meeting

Plaintiff Democracy Partners' Claim of Interception of Oral Communications Under the Federal and D.C. Wiretapping Statutes

First Element

1. Do you find that Plaintiff Democracy Partners has proven by a preponderance of the evidence that Defendant Allison Maass acquired with an electronic, mechanical or other device the contents of any oral communications of Democracy Partners members or staff that were spoken within the Democracy Partners conference room in the recordings presented as Plaintiffs Exhibits #118-1 and #118-2? All jurors must agree upon the same answer.

YES

~~X~~
NO

If your answer to Question #1 is Yes, then proceed to Question #2. If your answer is No, then you must ignore Question #2 and proceed to Question #3.

Second Element

2. Do you find that Plaintiff Democracy Partners has proven by a preponderance of the evidence that Defendant Allison Maass was not a party to the conversation that occurred within the Democracy Partners conference room in the recording presented as Plaintiffs Exhibits #118-1 and #118-2? All jurors must agree upon the same answer.

YES

NO

Wiretapping Claims—Tortious Purpose

**Plaintiff Democracy Partners' Claim of Recording with Tortious Purpose Under the
Federal and D.C. Wiretapping Statutes**

First Element

3. Do you find that Plaintiff Democracy Partners has proven by a preponderance of the evidence the existence of a fiduciary relationship between Plaintiff Democracy Partners and Defendant Allison Maass? All jurors must agree upon the same answer.

 X
YES

NO

If your answer to Question #3 is Yes, then proceed to Question #4. If your answer is No, then you must ignore Question #4 and proceed to Question #5.

Second Element

4. Do you find that Plaintiff Democracy Partners has proven by a preponderance of the evidence that Defendant Allison Maass's primary or determinative purpose in hidden camera recordings of her own conversations with Democracy Partners members and staff was to commit a breach of fiduciary duty? All jurors must agree upon the same answer.

 X
YES

NO

It is the judge's responsibility to determine damages for the Wiretapping Claims. Whatever your answers to Questions #1 through #4, you must not be concerned with damages under the Wiretapping Claims. You must consider the claim of Fraudulent Misrepresentation in Questions #5 and #6 independently from the Wiretapping Claims.

Fraudulent Misrepresentation Claim

Plaintiff Strategic Consulting Group's Claim of Fraudulent Misrepresentation

5. Do you find that Plaintiff Strategic Consulting Group has proven by clear and convincing evidence that Defendants committed the tort of Fraudulent Misrepresentation against Strategic Consulting Group? All jurors must agree upon the same answer.

 X
YES

NO

If your answer to Question #5 is Yes, then proceed to Question #6. If your answer is No, then you must ignore Question #6 and proceed to the date and signature of this Verdict Form.

Actual Damages

6. If you answered YES to Question #5, how much do you award Plaintiff Strategic Consulting Group in damages for Fraudulent Misrepresentation? You must consider the damages from Fraudulent Misrepresentation independently from the Wiretapping Claims. All jurors must agree on the same answer. Otherwise, leave the line below blank.

\$ 120,000

After you answer or ignore Question #6, the Foreperson of the jury should sign and date this Verdict Form and return it to the Courtroom Deputy Clerk.

9/22/22
Date



Signature of Foreperson