

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

RUBY FREEMAN, *et al.*,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

Civil Action No. 21-3354 (BAH)

Judge Beryl A. Howell

**FILED**

**DEC 15 2023**

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

VERDICT FORM

We, the Jury, unanimously find the following on the questions submitted to us:

**COMPENSATORY DAMAGES:**

**DEFAMATION CLAIM**

1. What amount of compensatory damages, if any, would fairly and reasonably compensate Ms. Freeman for defamation caused by Mr. Giuliani and his co-conspirators?

AMOUNT: \$ 16,171,000.00

2. What amount of compensatory damages, if any, would fairly and reasonably compensate Ms. Moss for defamation caused by Mr. Giuliani and his co-conspirators?

AMOUNT: \$ 16,998,000.00

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS CLAIM**

3. What amount of compensatory damages, if any, would fairly and reasonably compensate Ms. Freeman for emotional distress caused by Mr. Giuliani and his co-conspirators?

AMOUNT: \$ 20,000,000.00

4. What amount of compensatory damages, if any, would fairly and reasonably compensate Ms. Moss for emotional distress inflicted by Mr. Giuliani and his co-conspirators?

AMOUNT: \$ 20,000,000.00

**PUNITIVE DAMAGES:**

5. What amount of punitive damages, if any, should be awarded to Ms. Freeman and Ms. Moss for Mr. Giuliani's conduct?

AMOUNT: \$ 75,000,000.00

DATE and TIME:

12/15/23  
3<sup>35</sup>  
AM

Signature of foreperson