

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF THURSTON

STEPHEN CHAUSSEE, an individual,

Plaintiff,

vs.

STATE OF WASHINGTON,

Defendant.

No. 11-2-01884-6
SPECIAL VERDICT

2015 MAR 26 PM 4: 28
Linda Myers Esq.
Thurston County Clerk
SUPERIOR COURT
THURSTON COUNTY

We, the jury, answer the questions submitted by the Court as follows:

Question No. 1: Did Mr. Chaussee prove that he was a whistleblower?

ANSWER: Yes No

Question No. 2: Did Mr. Chaussee prove that he was demoted?

ANSWER: Yes No

INSTRUCTION: *If you answered "yes" to Questions 1 and 2, answer Question 3. If you answered "no" to either Question 1 or 2, do not answer any further questions and sign the verdict form.*

Question No. 3: Did the State prove:

(a) That the demotion action was taken for reasons unrelated to Mr. Chaussee's status as a whistleblower;

and

(b) That an improper retaliatory motive was not a substantial factor in the decision to demote Mr. Chaussee?

ANSWER: _____ Yes No

INSTRUCTION: *If you answered "Yes" to Question 3, do not answer any further questions and sign the verdict form. If you answered "no" to Question 3, answer Question 4.*

Question No. 4: Did the plaintiff suffer any noneconomic damages that were proximately caused by the Washington State Department of Transportation's decision to demote him?

ANSWER: Yes _____ No

INSTRUCTION: *If you answered "Yes" to Question 4, answer Question 5. If you answered "no" to Question 4, do not answer any further questions and sign the verdict form.*

Question No. 5: What do you find to be the amount of plaintiff's damages?

ANSWER: \$1 Million

INSTRUCTION: *Sign and return this verdict form, and notify the bailiff.*

DATED this 26 DAY of MARCH, 2015.

Brent A. Boehmer
Presiding Juror