

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.

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

No. 11-2-01884-6

SPECIAL VERDICT

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: X Yes _____ No

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

ANSWER: X 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