

IN THE SUPERIOR COURT OF THE COUNTIES OF WASHINGTON  
FOR KING COUNTY

RYAN SANTHUFF,

Plaintiff,

vs.

THE STATE OF WASHINGTON AND  
DAVID JAMES NOBACH,

Defendants.

Case No.: 19-2-04610-4 KNT

**SPECIAL VERDICT FORM**

We, the jury in the above captioned case, submit the following answers to the questions provided by the Court as to Detective Santhuff:

**QUESTION NO. 1:** Has Detective Santhuff proven his Washington Law Against Discrimination retaliation claim against the Washington State Patrol or Lieutenant David James Nobach by a preponderance of the evidence?

ANSWER:  YES  NO

**QUESTION NO. 2:** Did Detective Santhuff prove by a preponderance of the evidence that he is a Whistleblower under the Washington State Whistleblower Law?

ANSWER:  YES  NO

**QUESTION NO. 3:** Did Detective Santhuff prove by a preponderance of the evidence that he was subjected to one or more reprisals or retaliatory actions under the Washington State Whistleblower Law?

ANSWER:  YES  NO

*If you answered "NO" to Questions #1, and #2, do not answer the remaining questions, and please sign and date the verdict form and notify the bailiff. If you answered "YES" to Questions #2 and #3, then answer Question #4.*

**QUESTION NO. 4:** For the Washington State Whistleblower Law claim, did the State prove by a preponderance of the evidence:

(a) That the State's action or actions were justified by reasons unrelated to Detective Santhuff's status as a whistleblower?

ANSWER:  YES  NO

(b) That an improper retaliatory motive was not a substantial factor in the reprisals or retaliatory actions.

ANSWER:  YES  NO

If you answered "YES" to Question #1 OR if you answered "YES" to Questions #2 and #3, and "NO" to either Question 4(a) or 4(b), then proceed to Question #5.

**QUESTION NO. 5:** Did Detective Santhuff suffer damages proximately caused by the actions of the Defendant State of Washington?


ANSWER:  YES  NO

*If you answered yes, please complete the next section.*

A: Front Pay: \$ \$ 400K  
B. Lost retirement: \$ \$ 200K  
C: Fear: \$ \$ 100K  
D: Stress: \$ \$ 100K  
E: Humiliation: \$ \$ 100K  
F: Anxiety: \$ \$ 100K  
G. Anguish: \$ \$ 100K  
H. Loss of enjoyment of life: \$ \$ 100K

*Once you have answered the questions as directed, please sign and date the verdict form and notify the bailiff.*

Dated this 28 day of September, 2020.

  
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Presiding Juror