

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

ORIGINAL

LAMONT LEE,

Plaintiff,

-v-

1:19-CV-473

THE CITY OF TROY, PATROLMAN
CHRISTOPHER PARKER,
PATROLMAN LOUIS PERFETTI,
PATROLMAN JUSTIN ASHE, and
PATROLMAN KYLE JONES,

Defendants.

VERDICT FORM

May 12, 2021
Utica, New York.

Court's Exhibit No. 4

ORIGINAL

EXCESSIVE FORCE: CHRISTOPHER PARKER

- 1A. Did defendant Christopher Parker use excessive force against plaintiff Lamont Lee, or fail to intervene to prevent the use of such force, on March 3, 2018?

Yes _____ No

If you answered YES, proceed to Question 1B.
If you answered NO, proceed to Question 2A.

- 1B. Was the excessive force a proximate cause of mental and/or physical injury to plaintiff Lamont Lee?

Yes _____ No _____

Proceed to Question 2A.

ASSAULT AND BATTERY: CHRISTOPHER PARKER

- 2A. Did defendant Christopher Parker use an unreasonable amount of force in arresting plaintiff Lamont Lee on March 3, 2018, amounting to assault and battery?

Yes _____ No

If you answered YES, proceed to Question 2B.
If you answered NO, proceed to Question 3A.

- 2B. Was the assault and battery a proximate cause of mental and/or physical injury to plaintiff Lamont Lee?

Yes _____ No _____

Proceed to Question 3A.

EXCESSIVE FORCE: LOUIS PERFETTI

3A. Did defendant Louis Perfetti use excessive force against plaintiff Lamont Lee, or fail to intervene to prevent the use of such force, on March 3, 2018?

Yes _____ No

If you answered YES, proceed to Question 3B.
If you answered NO, proceed to Question 4A.

3B. Was the excessive force a proximate cause of mental and/or physical injury to plaintiff Lamont Lee?

Yes _____ No _____

Proceed to Question 4A.

ASSAULT AND BATTERY: LOUIS PERFETTI

4A. Did defendant Louis Perfetti use an unreasonable amount of force in arresting plaintiff Lamont Lee on March 3, 2018, amounting to assault and battery?

Yes _____ No

If you answered YES, proceed to Question 4B.
If you answered NO, proceed to Question 5A.

4B. Was the assault and battery a proximate cause of mental and/or physical injury to plaintiff Lamont Lee?

Yes _____ No _____

Proceed to Question 5A.

EXCESSIVE FORCE: JUSTIN ASHE

5A. Did defendant Justin Ashe use excessive force against plaintiff Lamont Lee, or fail to intervene to prevent the use of such force, on March 3, 2018?

Yes _____ No

If you answered YES, proceed to Question 5B.
If you answered NO, proceed to Question 6A.

5B. Was the excessive force a proximate cause of mental and/or physical injury to plaintiff Lamont Lee?

Yes _____ No _____

Proceed to Question 6A.

ASSAULT AND BATTERY: JUSTIN ASHE

6A. Did defendant Justin Ashe use an unreasonable amount of force in arresting plaintiff Lamont Lee on March 3, 2018, amounting to assault and battery?

Yes _____ No

If you answered YES, proceed to Question 6B.
If you answered NO, proceed to Question 7A.

6B. Was the assault and battery a proximate cause of mental and/or physical injury to plaintiff Lamont Lee?

Yes _____ No _____

Proceed to Question 7A.

EXCESSIVE FORCE: KYLE JONES

7A. Did defendant Kyle Jones use excessive force against plaintiff Lamont Lee, or fail to intervene to prevent the use of such force, on March 3, 2018?

Yes _____ No

If you answered YES, proceed to Question 7B.
If you answered NO, proceed to Question 8A.

7B. Was the excessive force a proximate cause of mental and/or physical injury to plaintiff Lamont Lee?

Yes _____ No _____

Proceed to Question 8A.

ASSAULT AND BATTERY: KYLE JONES

8A. Did defendant Kyle Jones use an unreasonable amount of force in arresting plaintiff Lamont Lee on March 3, 2018, amounting to assault and battery?

Yes _____ No

If you answered YES, proceed to Question 8B.
If you answered NO, proceed to Question 9.

8B. Was the assault and battery a proximate cause of mental and/or physical injury to plaintiff Lamont Lee?

Yes _____ No _____

Proceed to Question 9.

ASSAULT AND BATTERY: CITY OF TROY

9. Complete this section ONLY if you answered YES to Question 2A, 4A, 6A, and/or 8A.

Did defendant Christopher Parker, Louis Perfetti, Justin Ashe, and/or Kyle Jones assault and batter plaintiff Lamont Lee in furtherance of the City of Troy's municipal objectives and within the scope of their employment with the City?

Yes _____ No _____

Proceed to Question 10.

DAMAGES

ACTUAL DAMAGES

10. Complete this section **ONLY IF** you answered **YES** to Question 1B, 2B, 3B, 4B, 5B, 6B, 7B, and/or 8B, otherwise proceed to Question 11.

Pain and Suffering / Personal Injuries: \$ _____

Mental Anguish and Humiliation: \$ _____

TOTAL Actual Damages: \$ _____

Proceed to Question 11.

NOMINAL DAMAGES

11. Complete this section **ONLY IF** you answered **NO** to Question 1B, 2B, 3B, 4B, 5B, 6B, 7B and/or 8B, otherwise proceed to Question 12A.

Is plaintiff Lamont Lee entitled to \$1.00 in nominal damages from defendants?

Yes _____ No _____

Proceed to Question 12A.

PUNITIVE DAMAGES

12A. Complete this section **ONLY IF** you answered **YES** to Question 1A and/or 2A, otherwise proceed to Question 12B.

Do you find that plaintiff Lamont Lee is entitled to punitive damages from defendant Christopher Parker?

Yes _____ No _____

Proceed to Question 12B.

12B. Complete this section ONLY IF you answered YES to Question 3A and/or 4A, otherwise proceed to Question 12C.

Do you find that plaintiff Lamont Lee is entitled to punitive damages from defendant Louis Perfetti?

Yes _____ No _____

Proceed to Question 12C.

12C. Complete this section ONLY IF you answered YES to Question 5A and/or 6A, otherwise proceed to Question 12D.

Do you find that plaintiff Lamont Lee is entitled to punitive damages from defendant Justin Ashe?

Yes _____ No _____

Proceed to Question 12D.

12D. Complete this section ONLY IF you answered YES to Question 7A and/or 8A, otherwise proceed to the last page.

Do you find that plaintiff Lamont Lee is entitled to punitive damages from defendant Kyle Jones?

Yes _____ No _____

PROCEED TO THE NEXT PAGE, SIGN IN THE SPACE PROVIDED, AND NOTIFY THE MARSHAL THAT YOU HAVE REACHED A VERDICT.

Please sign and date this verdict form.
YOUR VERDICT MUST BE UNANIMOUS.
ALL JURORS MUST SIGN.

Dated: May 12, 2021



[Handwritten signature]