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**UNITED STATES DISTRICT COURT
DISTRICT OF CALIFORNIA**

JONATHAN MICHAEL CASTRO,

Plaintiff,

v.

COUNTY OF LOS ANGELES, LOS ANGELES SHERIFF'S DEPARTMENT, DAVID VALENTINE, and CHRISTOPHER SOLOMON,

Defendants.

Case No. CV 10-5425 DSF (JEMX)

**REDACTED
VERDICT FORM**

JURY VERDICT FORM

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WE, THE JURY, in the above-entitled action unanimously find as follows:

QUESTION NO. 1: Did Sergeant David Valentine know of a substantial risk of serious harm to plaintiff Jonathan Castro?

Yes No

If you answered "YES" to Question No. 1, please answer the next question.

If you answered "NO" to Question No. 1, please skip to Question No. 4.

QUESTION NO. 2: Was David Valentine deliberately indifferent to that risk — that is, did he disregard it by failing to take reasonable measures to address it?

Yes No

If you answered "YES" to Question No. 2, please answer the next question.

If you answered "NO" to Question No. 2, please skip to Question No. 4.

QUESTION NO. 3: Did David Valentine's conduct in disregarding a substantial risk of serious harm to plaintiff cause plaintiff's injuries?

Yes No

Please answer the next question.

1 **QUESTION NO. 4:** Did Custody Assistant Christopher Solomon know of a
2 substantial risk of serious harm to plaintiff Jonathan Castro?

3

4

Yes No

5

6 If you answered "YES" to Question No. 4, please answer the next question.

7 If you answered "NO" to Question No. 4, please skip to Question No. 11.

8

9 **QUESTION NO. 5:** Was Christopher Solomon deliberately indifferent to that risk
10 — that is, did he disregard it by failing to take reasonable measures to address it?

11

12

Yes No

13

14 If you answered "YES" to Question No. 5, please answer the next question.

15 If you answered "NO" to Question No. 5, please skip to Question No. 11.

16

17 **QUESTION NO. 6:** Did Christopher Solomon's conduct in disregarding a
18 substantial risk of serious harm to plaintiff cause plaintiff's injuries?

19

20

Yes No

21

22 If you answered "YES" to Question No. 6, please answer the next question.

23 If you answered "NO" to Question No. 6, please skip to Question No. 11.

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25 **QUESTION NO. 7:** Did Sergeant David Valentine direct his subordinate,
26 Christopher Solomon, in disregarding a substantial risk of serious harm to
27 plaintiff?

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Yes _____ No

Please answer the next question.

QUESTION NO. 8: Did David Valentine set in motion a series of acts by his subordinate, Christopher Solomon, that Valentine knew or should have known would cause Solomon to disregard a substantial risk of serious harm to plaintiff?

Yes No _____

Please answer the next question.

QUESTION NO. 9: Did David Valentine know, or should David Valentine have known, that his subordinate Christopher Solomon would disregard a substantial risk of serious harm to plaintiff?

Yes No _____

If you answered "YES" to Question No. 9, please answer the next question.
If you answered "NO" to Question No. 9, please skip to Question No. 11.

QUESTION NO. 10: Did David Valentine fail to prevent his subordinate, Christopher Solomon, from disregarding a substantial risk of serious harm to plaintiff?

Yes No _____

Please answer the next question.

1 **QUESTION NO. 11:** Did the County of Los Angeles Sheriff's Department have a
2 long-standing custom or practice that was deliberately indifferent to a substantial
3 risk of serious harm to prisoners held in the West Hollywood detoxification cell?

4
5 Yes No

6
7 If you answered "YES" to Question No. 12, please answer the next question.

8 If you answered "NO" to Question No. 12, please skip to Direction No. 13.

9
10 **QUESTION NO. 12:** Did the County of Los Angeles Sheriff's Department's
11 long-standing custom or practice actually cause Jonathan Castro's injuries?

12
13 Yes No

14
15 Please proceed to Direction No. 13.

16
17 **DIRECTION NO. 13:** If you answered "YES" to Question Nos. 3, 6, 10, or 12,
18 please proceed to Damages Question Nos. 1 and 2. If all of Questions Nos. 3, 6,
19 10, and 12 were either answered "No" or left blank, please sign and date this form.

20
21 **DAMAGES QUESTION NO. 1:** What are Jonathan Castro's damages?

| | | |
|----|--|----------------------|
| 22 | | |
| 23 | a. Past loss of earnings | \$ <u>50,000.00</u> |
| 24 | b. Past medical expenses | \$ <u>945,632.02</u> |
| 25 | c. Future loss of earnings and lost earning capacity | \$ <u>360,000.00</u> |
| 26 | d. Future medical expenses | \$ <u>600,000.00</u> |
| 27 | e. Physical pain / mental suffering | \$ <u>650,000.00</u> |
| 28 | | |

1 **DAMAGES QUESTION NO. 2:** Did Custody Assistant Christopher Solomon or
2 Sergeant David Valentine act with malice, oppression, or reckless disregard for
3 plaintiff's rights?

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|---------------------|---|-----------------------------|
| Christopher Solomon | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| David Valentine | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

9 Please date, sign, and return this verdict form.

12 Date: 6-13-12

13 FOREPERSON J