UNITED STATES DISTRICT COURT

FOR THI	E DISTRICT OF COLUM	MBIA
CARMEN JEAN-BAPTISTE,)	
Plaintiff,))	
v.)) Civ	il Action No. 11-1587 (RCL)
DISTRICT OF COLUMBIA,)	FILED
Defendant.)	AUG 1 0 2012
	VERDICT FORM	Clerk, U.S. District and Bankruptcy Courts
A. TITLE VII and DC HUMAN AGAINST DISTRICT OF COL		JAL HARASSMENT CLAIM
A1. Do you find it more like unwelcome verbal or physical	· •	Weaver Subjected the plaintiff to

NO

If you answered NO, then your verdict must be in favor of the defendant. If you answered YES, then:

A2. Do you find the conduct was sufficiently severe or pervasive such that it created a hostile work environment by changing the terms and conditions of plaintiff's employment?



If you answered NO, then your verdict must be in favor of the defendant. If you answered YES, then:

A3. Do you find that the defendant exercised reasonable care to prevent and correct promptly any sexually harassing behavior in the workplace and that the plaintiff unreasonably failed to take advantage of the preventive or corrective opportunities provided by the defendant to avoid or correct the harm, or otherwise failed to exercise reasonable care to avoid harm?

YES

If you answered YES to Question A3, then your verdict on this claim must be in favor of the defendant.

B. TITLE VII AND DC HUMAN RIGHTS ACT RETALIATION CLAIM AGAINST DISTRICT OF COLUMBIA

B1. Has plaintiff proven by a preponderance of the evidence that plaintiff's complaint(s) was/were a substantial or motivating factor in the District of Columbia deciding not to offer plaintiff permanent employment or deciding to terminate her?



If you answered NO to Question B1, then your verdict on this claim must be in favor of the defendant.

C. DC WHISTLEBLOWER'S PROTECTION ACT CLAIM AGAINST DISTRICT OF COLUMBIA

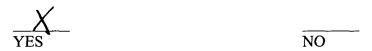
C1. Do you find it more likely than not that the plaintiff engaged in a protected activity?

If you answered NO, then your verdict must be in favor of the defendant. If you answered YES, then:

C2. Do you find that the defendant took a prohibited personnel action against the plaintiff?

If you answered NO, then your verdict must be in favor of the defendant. If you answered YES, then:

C3. Do you find that the plaintiff's protected activity was a substantial or motivating factor that prompted the District of Columbia to decide not to offer plaintiff permanent employment or deciding to terminate her?



If you answered NO to Question C3, then your verdict on this claim must be in favor of the defendant.

D. DAMAGES

If your answer to Question A3 is NO, or if your answer to Question B1 is YES, or if your answer to Question C3 is YES, what amount of damages do you award plaintiff?

\$ 3.5 million

Aug. 10,242

Date

Jury Foreperson .

FILED

Aug. 10, 2012

AUG 1 0 2012

Clerk, U.S. District and
Bankruptcy Courts)
We the jury in Larmen Jean-Baptiste,
plantiff, v. District of Columbia, 'Setendant, respectfully recommends the following be included as part of damages awarded in this Case: - The defendant District of Columbia most begin an 250 training program for all Managers and make this training available to all new managers, including femporary or summer managers; - The defendant must rewrite DPR personnel policies to remove ambigusties about the \$50 complaint and investigation processes and olarity what steps must be taken in an investigation of an 280 Camplaint. The defendant most instinte a review of the actions, or lack of action, taken by # all DPR employees and managers it the Takoma Pool and Aquatre Program from May 2006 through January 2007. The veview should be conducted by a person or persons with the power to issue a report to the Mayor of the District it Columbia with recommends from for appropriate ection, up to and including dismissal of any employee who is found to have violated DPR policies.