UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DANIEL BRADLEY,		
Plaintiff,		
ν.	No. 18-cv-30039-MGM	
CHRISTIAN CICERO, JOSEPH DUNN, and DANIEL MOYNAHAN,		
Defendants.		
VERDIC	T FORM	
FEDERAL CIVIL RIGHTS ACT (42 U.S.C. § 1983) UNREASONABLE SEZIURE		
Do you find that the Defendant Christian Amendment) the Plaintiff by conducting a	Cicero unlawfully seized (under the Fourth n unlawful traffic stop?	
Yes:	No:	
 Do you find that the Defendant Joseph D Amendment) the Plaintiff by conducting a conducting a pat frisk without reasonable s 	· ·	
Yes:	No:	
3. Do you find that the Defendant Daniel M Amendment) the Plaintiff by unlawfully co that Plaintiff was armed and dangerous?	loynahan unlawfully seized (under the Fourth enducting a pat frisk without reasonable suspicion	
Yes:	No:	

FEDERAL CIVIL RIGHTS ACT (42 U.S.C. § 1983) UNLAWFUL ARREST

4.	probable cause to believe he com	nitted a crime?
	Yes:X	No:
5.	Do you find that the Defendant \mathbf{D} probable cause to believe he communication	Paniel Moynahan unlawfully arrested the Plaintiff withou nitted a crime?
	Yes:	No:
	EX	RIGHTS ACT (42 U.S.C. § 1983) CESSIVE FORCE
6.	Do you find that the Defendant Jo or arrest of the Plaintiff?	oseph Dunn used excessive force in effecting the seizure
	Yes:	No:
7.	Do you find that the Defendant D seizure or arrest of the Plaintiff?	aniel Moynahan used excessive force in effecting the
	Yes:	No:

MASSACHSUETTS CIVIL RIGHT'S ACT (G.L. c. 12, §§ 11H & 11I) UNREASONABLE SEIZURE

8.	•	Christian Cicero, by means of threats, intimidation, or rethe Fourth Amendment or Article 14) the Plaintiff by op?
	Yes:	No:
9.	coercion, unlawfully seized (unde conducting an unlawful traffic sto suspicion of criminal activity, or l reasonable suspicion that he may	Toseph Dunn, by means of threats, intimidation, or it the Fourth Amendment or Article 14) the Plaintiff by op, or by asking for identification without reasonable by unlawfully removing him from the vehicle without have engaged in criminal activity, or by unlawfully asonable suspicion that Plaintiff was armed and dangerous?
	Yes:	No:
10.	coercion, unlawfully seized (unde unlawfully removing him from the engaged in criminal activity, or by	Daniel Moynahan, by means of threats, intimidation, or if the Fourth Amendment or Article 14) the Plaintiff by the vehicle without reasonable suspicion that he may have asking for identification without reasonable suspicion of conducting a pat frisk without reasonable suspicion that is?
	Yes:	No:
		IL RIGHTS ACT (G.L. c. 12, §§ 11H & 11I) ILAWFUL ARREST
11.	-	oseph Dunn , by means of threats, intimidation, or Plaintiff without probable cause to believe he committed a
	Yes:	No:
12.	•	Daniel Moynahan, by means of threats, intimidation, or Plaintiff without probable cause to believe he committed a
	Yes:	No:

MASSACHSUETTS CIVIL RIGHTS ACT (G.L. c. 12, $\S\S$ 11H & 11I) EXCESSIVE FORCE

13. Do you find that the Defendant Joseph Dunn, by means of threats, intimidation, or

coercion, used excessive force in effecti	ing the seizure or arrest of the Plaintiff?
Yes:X	No:
14. Do you find that the Defendant Danie coercion, used excessive force in effecti	I Moynahan, by means of threats, intimidation, or ing the seizure or arrest of the Plaintiff?
Yes:	No:

MASSACHUSETTS COMMON LAW FALSE ARREST

15. Do you find that the Defendant probable cause to believe he con	Joseph Dunn unlawfully arrested the Plaintiff without nmitted a crime?	
Yes:	No:	
16. Do you find that the Defendant probable cause to believe he con	Daniel Moynahan unlawfully arrested the Plaintiff without nmitted a crime?	
Yes:	No:	
MASSACHUSETTS COMMON LAW FALSE IMPRISONMENT		
17. Do you find that the Defendant Massachusetts law?	Joseph Dunn unlawfully confined the Plaintiff under	
Yes:	No:	
18. Do you find that the Defendant Massachusetts law?	Daniel Moynahan unlawfully confined the Plaintiff under	
Yes:	No:	

MASSACHUSETTS COMMON LAW ASSAULT AND BATTERY

19. Do you find that Defendant Joseph D Plaintiff?	unn committed an assault and battery on the
Yes: X	No:
20. Do you find that the Defendant Danie Plaintiff?	el Moynahan committed an assault and battery on the
Yes:	No:

Gu Thytenston you known

MASSACHUSETTS COMMON LAW MALICIOUS PROSECUTION

		1.00	<i>'_///</i>
	t the Defendant Joseph Dunn, with tiff without probable cause in violati	malice, initiated criminal proceedings on of Massachusetts law?	1
Yes:	<u>{</u>	No:	Iva
•	t the Defendant Daniel Moynahan, Inst the Plaintiff without probable ca	, with malice, initiated criminal use in violation of Massachusetts law	?
Yes:	· 	No:	
FI	EDERAL CIVIL RIGHTS ACT (MALICIOUS PROSECU		
proceedings again		ntionally or recklessly, initiated crimin use resulting in Plaintiff's incarceratio	,
Yes:X		No:	And the second s
criminal proceed	t the Defendant Daniel Moynahan, lings against the Plaintiff without pro violation of the Fourth Amendment	obable cause resulting in Plaintiff's	A.S (
Yes:		No:	The second secon
			A PART AND
Docket	Mrg. fordie Not Girlt	1	

MASSACHUSETTS COMMON LAW ABUSE OF PROCESS

25.	Do you find that the Defendant Plaintiff for an ulterior or illegiting	Joseph Dunn initiated criminal proceedings against the nate purpose?
	Yes:	No:
26.	Do you find that the Defendant the Plaintiff for an ulterior or ille	Daniel Moynahan initiated criminal proceedings against gitimate purpose?
	Yes:	No:
		HUSETTS COMMON LAW LICTION OF EMOTIONAL DISTRESS
27.	Do you find that the Defendant upon the Plaintiff?	Joseph Dunn intentionally inflicted emotional distress
	Yes:	No:
28.	Do you find that the Defendant upon the Plaintiff?	Daniel Moynahan intentionally inflicted emotional distress
	Yes:	. No:

COMPENSATORY DAMAGES

29.	If you answered "Yes" to any or all of questions 1 as compensatory damages as to Christian Cicero?	nd 8, what amount if any do you award
30.	If you answered "Yes" to any or all of questions 2, 27, what amount if any do you award as compensate	ory damages as to Joseph Dunn?
	\$ 60,000	
31.	If you answered "Yes" to any or all of questions 3, 28, what amount if any do you award as compensate	
	\$ 15,000	ortenn nor
32.	If you are awarding compensatory damages, are you	awarding pre-judgment interest?
	Yes:	No:
33.	If you found that Plaintiff has proved one or more what amount if any do you award as nominal damag	
	B	
34.	If you answered "Yes" to any or all of questions 1 a malicious, oppressive, or in reckless disregard, what damages as to Christian Cicero ?	
	Q	_
35.	If you answered "Yes" to any or all of questions 2, conduct was malicious, oppressive, or in reckless disaward as punitive damages as to Joseph Dunn ?	
	\$ 120,000	-

36.	If you answered "Yes" to any or all of questions 3, 5, 7, 10, 12, 14, and 24, and you find the
	conduct was malicious, oppressive, or in reckless disregard, what amount if any do you
	award as punitive damages as to Daniel Moynahan?

830,000