

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

RYAN STAIERT,

Plaintiff,

v.

BEN LOTT and DRAKE UNIVERSITY,

Defendants.

Case No. 05771 LACL159595

VERDICT FORM

2026 MAY 15 PM 4:05
CLERK OF DISTRICT COURT

On the claim of Ryan Staiert against Ben Lott and Drake University, we, the jury, find as follows:

DEFAMATION PER SE

1. Did Ryan Staiert prove his claim of Defamation Per Se, as submitted in Instruction Number 9?

Yes _____

No X _____

[If your answer is Yes, move to Question No. 2. If your answer is No, move to Question No. 5.]

2. Did the Defendants prove the Affirmative Defense of Truth, as submitted in Instruction Number 10?

Yes _____

No _____

[If your answer is Yes, move to Question No. 5. If your answer is No, move to Question No. 3.]

3. What amount of General Damages do you find?

General Damages \$ _____

[Move to Question No. 4].

4. State the amount of damages to reputation, if any, sustained by Plaintiff Ryan Staiert caused by Defendants' Defamation Per Se. If Plaintiff Ryan Staiert has failed to prove

this item of damage or has failed to prove this item of damage was caused by Defendants' Defamation Per Se, enter "0" (zero) for that item.

Loss of Reputation \$ _____

[Move to Question No. 5].

DEFAMATION PER QUOD

5. Did Ryan Staiert prove his claim of Defamation Per Quod, as submitted in Instruction Number 12?

Yes _____
No X

[If your answer is Yes, move to Question No. 6. If your answer is No, move to Question No. 8.]

6. Did the Defendants prove the Affirmative Defense of Truth, as submitted in Instruction No. 10?

Yes _____
No _____

[If your answer is Yes, move to Question No. 8. If your answer is No, move to Question No. 7.]

7. State the amount of damages to reputation, if any, sustained by Plaintiff Ryan Staiert caused by Defendants' Defamation Per Quod. If Plaintiff Ryan Staiert has failed to prove this item of damage or has failed to prove this item of damage was caused by Defendants' Defamation Per Quod, enter "0" (zero) for that item.

Loss of reputation \$ _____

[Move to Question No. 8].

PUNITIVE DAMAGES

8. Only proceed to answer questions in this section if you awarded damages in answer to Question Nos. 3, 4, or 7. If you awarded damages in answer to Questions Nos. 3, 4, or 7, move to Question No. 9. If you did not award any damages in Questions Nos. 3, 4, or 7, do not answer any further questions.

9. Do you find by a preponderance of clear, convincing, and satisfactory evidence the conduct of Coach Lott constituted willful and wanton disregard for the rights or safety of another and caused actual damage to Ryan Staiert according to Instruction No. 15?

Yes _____

No _____

[If your answer is Yes, move to Question No. 10. If your answer is No, do not answer any further questions.]

10. What amount of punitive damages, if any, do you award against Coach Lott?

\$ _____

[Move to Question No. 11].

11. Was the conduct of Coach Lott directed specifically at Ryan Staiert?

Yes _____

No _____

[Move to Question No. 12].

12. Is Drake University liable for punitive damages according to Instruction Number 17?

Yes _____

No _____

Saunders Conley

FOREPERSON

*To be signed only if verdict is unanimous.

Juror**

Juror**

Juror**

Juror**

Juror**

Juror**

Juror**

*To be signed by the jurors agreeing thereto after six hours or more of deliberation.