

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 21-cv-22850-KMW

TONY IBANEZ,

Plaintiff,

vs.

MIAMI-DADE COUNTY,

Defendant.

JOINT VERDICT FORM

Count I – Racially Hostile Work Environment

Do you find from a preponderance of the evidence:

1. That Mr. Ibanez’s supervisor harassed Mr. Ibanez because of his race and/or color?

Answer Yes or No NO

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

2. That the harassment created a hostile work environment for Mr. Ibanez?

Answer Yes or No _____

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

3. That Miami-Dade County exercised reasonable care to prevent and promptly correct any harassing behavior in the workplace because of race and/or color?

Answer Yes or No _____

If your answer is “Yes,” go to the next question. If your answer is “No,” go to Question No. 5.

4. (a) That Mr. Ibanez took advantage of the preventive or corrective opportunities provided by Miami-Dade County and Miami-Dade County responded by taking reasonable and prompt corrective action.

Answer Yes or No _____; **OR**

(b) That Mr. Ibanez unreasonably failed to take advantage of preventative or corrective opportunities Miami-Dade County provided to avoid or correct the harm.

Answer Yes or No _____

If your answer is "Yes" to either part of the question, this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is "No," go to the next question.

5. That Mr. Ibanez suffered damages because of the hostile work environment.

Answer Yes or No _____

If your answer is "No," this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If you answered "Yes," go to the next question.

6. That Mr. Ibanez should be awarded damages to compensate for emotional pain and mental anguish?

Answer Yes or No _____

If your answer is "No," this ends your deliberations, and your foreperson should sign and date the last page of this verdict form.

If your answer is "Yes,"
in what amount? \$ _____

This ends your deliberations, and your foreperson should sign and date the last page of this verdict form.

SO SAY WE ALL.

DATE:

7/7/23

Foreperson's Signature

[Handwritten signature]