

2. Did Dan Ramirez intend to deceive Vicken Massoyan, Maggie Antaramian and the class members by concealing the fact?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here and go to **Section 2**.

3. Did Vicken Massoyan, Maggie Antaramian and the class members rely on Dan Ramirez's deception and was such reliance reasonable under the circumstances?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here and go to **Section 2**.

4. Was Dan Ramirez's concealment a substantial factor in causing harm to Vicken Massoyan, Maggie Antaramian and the class members?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here and go to **Section 2**.

5. What are Vicken Massoyan, Maggie Antaramian and the class members' damages? \$ 720,000

SECTION 2

**NEGLIGENT MISREPRESENTATION
(Dan Ramirez Only)**

6. Did Dan Ramirez make a false representation of an important fact to Vicken Massoyan, Maggie Antaramian and the class members?

☒ Yes ☐ No

If your answer to question 6 is yes, then answer question 7. If you answered no, stop here and go to **Section 3**.

7. Did Dan Ramirez honestly believe that the representation was true when he made it?

☒ Yes ☐ No

If your answer to question 7 is yes, then answer question 8. If you answered no, stop here and go to **Section 3**.

8. Did Dan Ramirez have reasonable grounds for believing the representation was true when he made it?

☒ Yes ☐ No

If your answer to question 8 is no, then answer question 9. If you answered yes, stop here and go to **Section 3**.

9. Did Dan Ramirez intend that Vicken Massoyan, Maggie Antaramian and the class members to rely on the representation?

☐ Yes ☐ No

If your answer to question 9 is yes, then answer question 10. If you answered no, stop here and go to **Section 3**.

1 10. Did Vicken Massoyan, Maggie Antaramian and the class members reasonably
2 rely on the representation?

3 _____ Yes _____ No

4 If your answer to question 10 is yes, then answer question 11. If you answered no,
5 stop here and go to **Section 3**.

6
7 11. Were Vicken Massoyan, Maggie Antaramian and the class members' reliance on
8 Dan Ramirez's representation a substantial factor in causing harm to Plaintiffs or the class?

9 _____ Yes _____ No

10 If your answer to question 11 is yes, then answer question 12. If you answered no,
11 stop here and go to **Section 3**.

12
13
14 12. What are Vicken Massoyan, Maggie Antaramian and the class members'
15 damages? \$ _____

16
17
18 **REGARDLESS OF YOUR ANSWERS TO SECTIONS 1 AND 2**

19 **YOU MUST ANSWER THE FOLLOWING QUESTIONS**
20
21
22
23
24
25
26
27
28

SECTION 3

**CONSPIRACY
(Dan Ramirez)**

13. Was Dan Ramirez aware that John Otto planned to conceal material facts from Vicken Massoyan, Maggie Antaramian and the class members?

☒ Yes ☐ No

If your answer to question 13 is yes, then answer question 14. If you answered no, stop here and go to **Section 4**.

14. Did Dan Ramirez agree with John Otto and intend that material information be concealed from Vicken Massoyan, Maggie Antaramian and the class members?

☐ Yes ☒ No

If your answer to question 14 is yes, then answer question 15. If you answered no, stop here and go to **Section 4**.

15. At all times was Dan Ramirez acting as an agent or employee of HL Leasing, Inc. and not acting to advance his own personal interests?

☐ Yes ☐ No

**REGARDLESS OF YOUR ANSWERS TO SECTIONS 1 THROUGH 3
YOU MUST ANSWER THE FOLLOWING QUESTIONS**

SECTION 4

**CONSPIRACY
(Andy Fernandez)**

16. Was Andy Fernandez aware that John Otto and/or Dan Ramirez planned to conceal material facts from Vicken Massoyan, Maggie Antaramian and the class members?

____ Yes ☒ No

If your answer to question 16 is yes, then answer question 17. If you answered no, stop here and go to **Section 5**.

17. Did Andy Fernandez agree with John Otto and/or Dan Ramirez and intend that material information be concealed from Vicken Massoyan, Maggie Antaramian and the class members?

____ Yes ____ No

If your answer to question 17 is yes, then answer question 18. If you answered no, stop here and go to **Section 5**.

18. At all times was Andy Fernandez acting as an agent or employee of HL Leasing, Inc. and not acting to advance his own personal interests?

____ Yes ____ No

**REGARDLESS OF YOUR ANSWERS TO SECTIONS 1 THROUGH 4
YOU MUST ANSWER THE FOLLOWING QUESTIONS**

SECTION 5

**CONSPIRACY
(Kathy Otto)**

19. Was Kathy Otto aware that John Otto and/or Dan Ramirez planned to conceal material facts from Vicken Massoyan, Maggie Antaramian and the class members?

____ Yes ☒ No

If your answer to question 19 is yes, then answer question 20. If you answered no, stop here and go to **Section 6**.

20. Did Kathy Otto agree with John Otto and/or Dan Ramirez and intend that material information be concealed from Vicken Massoyan, Maggie Antaramian and the class members?

____ Yes ____ No

REGARDLESS OF YOUR ANSWERS TO SECTIONS 1 THROUGH 5

YOU MUST ANSWER THE FOLLOWING QUESTIONS

SECTION 6

**AIDING AND ABETTING
(Dan Ramirez)**

21. Did Dan Ramirez know that concealment of material facts was being committed by John Otto against Vicken Massoyan, Maggie Antaramian and the class members?

☒ Yes ☐ No

If your answer to question 21 is yes, then answer question 22. If you answered no, stop here and go to **Section 7**.

22. Did Dan Ramirez give substantial assistance or encouragement to John Otto?

☒ Yes ☐ No

If your answer to question 22 is yes, then answer question 23. If you answered no, stop here and go to **Section 7**.

23. Was Dan Ramirez's conduct a substantial factor in causing harm to Vicken Massoyan, Maggie Antaramian and the class members?

☒ Yes ☐ No

REGARDLESS OF YOUR ANSWERS TO SECTIONS 1 THROUGH 6

YOU MUST ANSWER THE FOLLOWING QUESTIONS

SECTION 7

**AIDING AND ABETTING
(Andy Fernandez)**

24. Did Andy Fernandez know that concealment of material facts was being committed by John Otto and/or Dan Ramirez against Vicken Massoyan, Maggie Antaramian and the class members?

☒ Yes ☐ No

If your answer to question 24 is yes, then answer question 25. If you answered no, stop here and go to **Section 8**.

25. Did Andy Fernandez give substantial assistance or encouragement to John Otto and/or Dan Ramirez?

☒ Yes ☐ No

If your answer to question 25 is yes, then answer question 26. If you answered no, stop here and go to **Section 8**.

26. Was Andy Fernandez's conduct a substantial factor in causing harm to Vicken Massoyan, Maggie Antaramian and the class members?

☒ Yes ☐ No

REGARDLESS OF YOUR ANSWERS TO SECTIONS 1 THROUGH 7

YOU MUST ANSWER THE FOLLOWING QUESTIONS

SECTION 8

**AIDING AND ABETTING
(Kathy Otto)**

27. Did Kathy Otto know that concealment of material facts was being committed by John Otto and/or Dan Ramirez against Vicken Massoyan, Maggie Antaramian and the class members?

☒ Yes ☐ No

If your answer to question 27 is yes, then answer question 28. If you answered no, stop here and go to **Section 9**.

28. Did Kathy Otto give substantial assistance or encouragement to John Otto and/or Dan Ramirez?

☒ Yes ☐ No

If your answer to question 28 is yes, then answer question 29. If you answered no, stop here and go to **Section 9**.

29. Was Kathy Otto's conduct a substantial factor in causing harm to Vicken Massoyan, Maggie Antaramian and the class members?

☐ Yes ☒ No

**REGARDLESS OF YOUR ANSWERS TO SECTIONS 1 THROUGH 8
YOU MUST ANSWER THE FOLLOWING QUESTIONS**

SECTION 9

PLAINTIFFS' COMPARATIVE FAULT

30. Did Plaintiffs' own negligence cause Plaintiffs' harm?

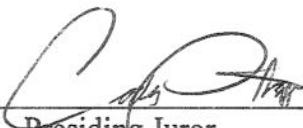
X Yes _____ No

If your answer to question 30 is yes, then answer question 31. If you answered no, then answer question 32 and do not reduce the total damages by any amount.

31. What percent of Plaintiffs' negligence caused their damages? 50 %

32. What are Plaintiffs' damages after reducing their total damages by the percentage of responsibility that you attribute to Plaintiffs, if any? \$ 46,500,000

SIGNED: _____


Presiding Juror

DATED: _____

8/4/11