

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

PETER MCCARTHY, and
STEPS TO SOLUTIONS, INC.,

Defendants.

Civil Action No. 21-11300-DLC

VERDICT FORM

1. Did the United States prove by a preponderance of the evidence that the Defendants engaged in a pattern or practice of sexual harassment in violation of the Fair Housing Act?

Yes ☒

No ☐

2. Did the United States prove by a preponderance of the evidence that the Defendants denied a group of persons – women – rights granted or protected by the Fair Housing Act?

Yes ☒

No ☐

IF YOU ANSWERED “YES” TO EITHER QUESTION 1 OR QUESTION 2 OR BOTH, THEN ANSWER QUESTIONS 3 – 16. IF YOU ANSWERED “NO” TO QUESTIONS 1 AND 2, DO NOT ANSWER QUESTIONS 3-16.

JILL LOVELY

3. Did the United States prove by a preponderance of the evidence that JILL LOVELY has been injured by the Defendants' discriminatory housing practice(s)?

Yes ☒

No ☐

If yes, indicate the sum of money (compensatory damages) that you believe will fairly compensate JILL LOVELY for the harm caused by the Defendants.

\$ 115,000

(in numbers)

\$ ONE HUNDRED AND FIFTEEN THOUSAND

(in words)

IF YOU ANSWERED "YES" TO QUESTION 3, THEN ANSWER QUESTION 4. IF YOU ANSWERED "NO" TO QUESTION 3, THEN PROCEED TO QUESTION 5.

4. Should the Defendants be assessed punitive damages as to JILL LOVELY?

Yes ☒

No ☐

If yes, what sum of money should be paid in punitive damages to JILL LOVELY?

\$ 125,000

(in numbers)

\$ ONE HUNDRED AND TWENTY FIVE THOUSAND

(in words)

CARRIE ANN MACDOUGALL

5. Did the United States prove by a preponderance of the evidence that CARRIE ANN MACDOUGALL has been injured by the Defendants' discriminatory housing practice(s)?

Yes ☒ No ☐

If yes, indicate the sum of money (compensatory damages) that you believe will fairly compensate CARRIE ANN MACDOUGALL for the harm caused by the Defendants.

\$ 105,000
(in numbers)

\$ ONE HUNDRED AND FIVE THOUSAND
(in words)

IF YOU ANSWERED "YES" TO QUESTION 5, THEN ANSWER QUESTION 6. IF YOU ANSWERED "NO" TO QUESTION 5, THEN PROCEED TO QUESTION 7.

6. Should the Defendants be assessed punitive damages as to CARRIE ANN MACDOUGALL?

Yes ☒ No ☐

If yes, what sum of money should be paid in punitive damages to CARRIE ANN MACDOUGALL?

\$ 525,000
(in numbers)

\$ FIVE HUNDRED AND TWENTY FIVE THOUSAND
(in words)

MINDY MANGINI

7. Did the United States prove by a preponderance of the evidence that MINDY MANGINI has been injured by the Defendants' discriminatory housing practice(s)?

Yes ☒ No ☐

If yes, indicate the sum of money (compensatory damages) that you believe will fairly compensate MINDY MANGINI for the harm caused by the Defendants.

\$ 300,000
(in numbers)

\$ THREE HUNDRED THOUSAND
(in words)

IF YOU ANSWERED "YES" TO QUESTION 7, THEN ANSWER QUESTION 8. IF YOU ANSWERED "NO" TO QUESTION 7, THEN PROCEED TO QUESTION 9.

8. Should the Defendants be assessed punitive damages as to MINDY MANGINI?

Yes ☒ No ☐

If yes, what sum of money should be paid in punitive damages to MINDY MANGINI?

\$ 875,000
(in numbers)

\$ EIGHT HUNDRED AND SEVENTY FIVE THOUSAND
(in words)

AMANDA MANNING

9. Did the United States prove by a preponderance of the evidence that AMANDA MANNING has been injured by the Defendants' discriminatory housing practice(s)?

Yes ☒ No ☐

If yes, indicate the sum of money (compensatory damages) that you believe will fairly compensate AMANDA MANNING for the harm caused by the Defendants.

\$ 300,000

(in numbers)

\$ THREE HUNDRED THOUSAND

(in words)

IF YOU ANSWERED "YES" TO QUESTION 9, THEN ANSWER QUESTION 10. IF YOU ANSWERED "NO" TO QUESTION 9, THEN PROCEED TO QUESTION 11.

10. Should the Defendants be assessed punitive damages as to AMANDA MANNING?

Yes ☒ No ☐

If yes, what sum of money should be paid in punitive damages to AMANDA MANNING?

\$ 875,000

(in numbers)

EIGHT HUNDRED AND SEVENTY FIVE THOUSAND

(in words)

LAUREN MASSE

11. Did the United States prove by a preponderance of the evidence that LAUREN MASSE has been injured by the Defendants' discriminatory housing practice(s)?

Yes ✓ No

If yes, indicate the sum of money (compensatory damages) that you believe will fairly compensate LAUREN MASSE for the harm caused by the Defendants.

\$ 50,000
(in numbers)

\$ FIFTY THOUSAND
(in words)

IF YOU ANSWERED "YES" TO QUESTION 11, THEN ANSWER QUESTION 12. IF YOU ANSWERED "NO" TO QUESTION 11, THEN PROCEED TO QUESTION 13.

12. Should the Defendants be assessed punitive damages as to LAUREN MASSE?

Yes ✓ No

If yes, what sum of money should be paid in punitive damages to LAUREN MASSE?

\$ 25,000
(in numbers)

\$ TWENTY FIVE THOUSAND
(in words)

KELLI YEO

13. Did the United States prove by a preponderance of the evidence that KELLI YEO has been injured by the Defendants' discriminatory housing practice(s)?

Yes ☒ No ☐

If yes, indicate the sum of money (compensatory damages) that you believe will fairly compensate KELLI YEO for the harm caused by the Defendants.

\$ 150,000
(in numbers)

\$ ONE HUNDRED FIFTY THOUSAND
(in words)

IF YOU ANSWERED "YES" TO QUESTION 13, THEN ANSWER QUESTION 14. IF YOU ANSWERED "NO" TO QUESTION 13, THEN PROCEED TO QUESTION 15.

14. Should the Defendants be assessed punitive damages as to KELLI YEO?

Yes ☒ No ☐

If yes, what sum of money should be paid in punitive damages to KELLI YEO?

\$ 325,000
(in numbers)

\$ THREE HUNDRED AND TWENTY FIVE THOUSAND
(in words)

MICHAEL FROMER

15. Did the United States prove by a preponderance of the evidence that MICHAEL FROMER has been injured by the Defendants' discriminatory housing practice(s)?

Yes ☒ No ☐

If yes, indicate the sum of money (compensatory damages) that you believe will fairly compensate MICHAEL FROMER for the harm caused by the Defendants.

\$ 10,000
(in numbers)

\$ TEN THOUSAND
(in words)

IF YOU ANSWERED "YES" TO QUESTION 15, THEN ANSWER QUESTION 16. IF YOU ANSWERED "NO" TO QUESTION 15, DO NOT ANSWER QUESTION 16.

16. Should the Defendants be assessed punitive damages as to MICHAEL FROMER?

Yes ☒ No ☐

If yes, what sum of money should be paid in punitive damages to MICHAEL FROMER?

\$ 25,000
(in numbers)

\$ TWENTY FIVE THOUSAND
(in words)

I certify that the answers to the questions are unanimous.

ECE Johnson

Foreperson

MAY 17, 2024

Date