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7 Ofc. Sandoval and Ofc. Doolittle

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 JOSE DECASTRO,

11 Plaintiff,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; STATE OF NEVADA;
14 BRANDEN BOURQUE; JASON TORREY;
15 C. DINGLE; B. SORENSON; JESSE
SANDOVAL; OFFICER DOOLITTLE and
16 DOES 1 to 50, inclusive,

17 Defendants.

Case Number:
2:23-cv-00580-APG-EJY

**LVMPD DEFENDANTS' PROPOSED
SPECIAL VERDICT FORM**

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18 WE THE JURY, having fully deliberated in this matter, unanimously find as follows:

19 **False Arrest Claim Against Defendant Bourque**

20 1. Did Officer Branden Bourque have probable cause to arrest Jose DeCastro for
21 obstructing a public officer and/or resisting arrest on March 15, 2023?

22 YES _____ NO _____

23 *Answer Question 2 only if you Answered "No" to Question 1. If you answered "Yes" to Question*
24 *1, skip Question 2.*

25 2. If you answered "No" to Question 1 what is the amount of damages you award
26 Plaintiff Jose DeCastro against Defendant Branden Bourque?

27 \$ _____

Unlawful Search and Seizure / Invasion of Privacy Claims Against Defendant Bourque

Answer Question 3 only if you Answered “No” to Question 1. If you answered “Yes” to Question 1, you must answer “No” to Question 3 and answer “0” to question 4.

3. Did Officer Branden Bourque violate Jose DeCastro’s Fourth Amendment right to be free from unreasonable searches when he searched Jose DeCastro incident to his arrest on March 15, 2023?

YES _____ NO _____

Answer Question 4 only if you Answered “Yes” to Question 3. If you answered “No” to Question 3, skip Question 4.

4. If you answered “yes” to Question 3 what is the amount of damages you award Plaintiff Jose DeCastro against Defendant Branden Bourque?

\$ _____

First Amendment Retaliation Claim Against Defendants Bourque and Torrey

Answer Questions 5-6 only if you Answered “No” to Question 1. If you answered “Yes” to Question 1, you must answer “No” to Questions 5-6.

5. Did Officer Branden Bourque arrested DeCastro to retaliate against DeCastro for his filming of the traffic stop?

YES _____ NO _____

Answer Question 6 only if you Answered “Yes” to Question 5. If you answered “No” to Question 5, you must answer “No” to Question 6.

6. Did Sergeant Erland Torrey know of and fail to prevent Officer Branden Bourque’s retaliatory arrest?

YES _____ NO _____

Answer Question 7 only if you Answered “Yes” to Question 5. If you answered “No” to Question 5, skip Question 7.

7. If you answered “yes” to Question 5 what is the amount of damages you award Plaintiff Jose DeCastro against Defendant Branden Bourque?

\$ _____

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1 Answer Question 8 only if you Answered "Yes" to Question 6. If you answered "No" to Question
2 6, skip Question 8.

3 8. If you answered "yes" to Question 6 what is the amount of damages you award
4 Plaintiff Jose DeCastro against Defendant Erland Torrey?

5 \$ _____

6 **Selective Enforcement Claim Against Defendants Bourque and Torrey**

7 9. Did Officer Branden Bourque selectively enforce the law against Jose DeCastro
8 based on his filming or speech?

9 YES _____ NO _____

10 10. Did Sergeant Erland Torrey selectively enforce the law against Jose DeCastro
11 based on his filming or speech?

12 YES _____ NO _____

13 Answer Question 11 only if you Answered "Yes" to Question 9. If you answered "No" to Question
14 9, skip Question 1.

15 11. If you answered "yes" to Question 9 what is the amount of damages you award
16 Plaintiff Jose DeCastro against Defendant Branden Bourque?

17 \$ _____

18 Answer Question 12 only if you Answered "Yes" to Question 10. If you answered "No" to Question
19 10, skip Question 12.

20 12. If you answered "yes" to Question 10 what is the amount of damages you award
21 Plaintiff Jose DeCastro against Defendant Erland Torrey?

22 \$ _____

23 **Excessive Force and Battery Claims Against Defendant Sandoval**

24 13. Did Officer Jesse Sandoval use excessive force against Jose DeCastro on March
25 15, 2023?

26 YES _____ NO _____

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1 Answer Question 14 only if you Answered "Yes" to Question 13. If you answered "No" to Question
2 13, skip Question 14.

3 14. If you answered "yes" to Question 13 what is the amount of damages you award
4 Plaintiff Jose DeCastro against Defendant Jesse Sandoval?

5 \$ _____

6 **Failure to Intervene Claims Against Defendants Bourque, Dingle, Sorenson, and**

7 **Doolittle**

8 Answer Questions 15-18 only if you Answered "Yes" to Question 13. If you answered "No" to
9 Question 13, you must answer "No" to Questions 15-18.

10 15. Did Officer Branden Bourque fail to intervene in Officer Jesse Sandoval's use of
11 excessive force against Jose DeCastro?

12 YES _____ NO _____

13 16. Did Officer Chadly Dingle fail to intervene in Officer Jesse Sandoval's use of
14 excessive force against Jose DeCastro?

15 YES _____ NO _____

16 17. Did Officer Brandon Sorenson fail to intervene in Officer Jesse Sandoval's use of
17 excessive force against Jose DeCastro?

18 YES _____ NO _____

19 18. Did Officer Clinton Doolittle fail to intervene in Officer Jesse Sandoval's use of
20 excessive force against Jose DeCastro?

21 YES _____ NO _____

22 Answer Questions 19-22 only if you Answered "Yes" to any of Questions 15-18. If you answered
23 "No" to Questions 15-18, skip Questions 19-22.

24 19. If you answered "yes" to Question 15 what is the amount of damages you award
25 Plaintiff Jose DeCastro against Defendant Branden Bourque?

26 \$ _____

27 20. If you answered "yes" to Question 16 what is the amount of damages you award
28 Plaintiff Jose DeCastro against Defendant Chadly Dingle?

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21. If you answered “yes” to Question 17 what is the amount of damages you award Plaintiff Jose DeCastro against Defendant Brandon Sorenson?

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22. If you answered “yes” to Question 18 what is the amount of damages you award Plaintiff Jose DeCastro against Defendant Clinton Doolittle?

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Punitive Damages

23. Is Plaintiff Jose DeCastro entitled to punitive damages for any violations of his Constitutional Rights?

- Officer Brandon Bourque Yes ____ No ____
- Sergeant Erland Torrey Yes ____ No ____
- Officer Jesse Sandoval Yes ____ No ____
- Officer Chadly Dingle Yes ____ No ____
- Officer Brandon Sorenson Yes ____ No ____
- Officer Clinton Doolittle Yes ____ No ____

24. What amount of punitive damages do you award for constitutional claims against the Officers?

- Officer Brandon Bourque \$ _____
- Sergeant Erland Torrey \$ _____
- Officer Jesse Sandoval \$ _____
- Officer Chadly Dingle \$ _____
- Officer Brandon Sorenson \$ _____
- Officer Clinton Doolittle \$ _____
- Total punitive damages: \$ _____

DATED this __ day of February, 2026.

PRESIDING JUROR

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Jury Interrogatory

Regardless of your answers to the previous questions, please answer these additional questions:

A. If you found that Ofc. Borque lacked probable cause to arrest DeCastro, you must then decide whether Ofc. Borque arrested him in “bad faith.” “Bad faith” requires something more than bad judgment or negligence. It imports a dishonest purpose, moral obliquity, conscious wrongdoing, breach of a known duty through some ulterior motive or ill will partaking of the nature of fraud. Do you find that Ofc. Borque arrested DeCastro in bad faith?

Yes _____ No _____

Dated this 2nd day of February, 2026.

MARQUIS AURBACH

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