

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CIRCUIT CIVIL DIVISION
CASE NO. 14-8718 CA 23

MILLIONAIRE GALLERY, INC.,

Plaintiff,

vs.

INVESTMENT INK, LLC d/b/a
SIGNATURE ROYALE.COM, RICHARD
FORBES, ROBERT GIL, and ROGER
GILCHRIST,

Defendants.

VERDICT FORM

We the jury return the following verdict:

1. Did Millionaire Gallery and Roberto Gil enter into a confidentiality agreement?

YES NO

If your answer to question number 1 is "No," your verdict on Millionaire Gallery's claim for breach of contract is for Roberto Gil and you should proceed to question 5.

If your answer to question number 1 is "Yes," answer question number 2.

2. Did Roberto Gil breach the confidentiality agreement?

YES NO

If your answer to question number 2 is "No," your verdict on Millionaire Gallery's claim for breach of contract is for Roberto Gil and you should proceed to question number 5.

If your answer to question number 2 is "Yes," answer question number 3.

3. Is Millionaire Gallery entitled to an award of damages as a result of Roberto Gil's breach?

YES NO

4. If your answer to question number 3 is "Yes," what is the amount of damages to which Millionaire Gallery is entitled?

\$ 101,464

5. Does Millionaire Gallery's customer data base constitute a trade secret?

YES NO

If your answer to question number 5 is "No," your verdict on Millionaire Gallery's claim for misappropriation of trade secrets is for Defendants and you should proceed to question number 12.

If your answer to question number 5 is "Yes," answer questions number 6, 7, 8 and 9.

6. Did Investment Ink, LLC d/b/a Signature Royale misappropriate Millionaire Gallery's trade secrets?

YES NO

7. Did Richard Forbes misappropriate Millionaire Gallery's trade secrets?

YES NO

8. Did Roberto Gil misappropriate Millionaire Gallery's trade secrets?

YES NO

9. Did Roger Gilchrist misappropriate Millionaire Gallery's trade secrets?

YES NO

If your answers to questions 6, 7, 8 and 9 are all "No," your verdict on Millionaire Gallery's claim for misappropriation of trade secrets is for Defendants and you should proceed to question number 12.

If your answer to question 6, 7, 8 or 9 is "Yes," answer question 10.

10. Is Millionaire Gallery entitled to an award of damages as a result of the misappropriation of its trade secrets?

YES NO

11. If your answer to question number 10 is "Yes," what is the amount of damages to which Millionaire Gallery is entitled?

\$ 492,492

12. Did Investment Ink, LLC d/b/a Signature Royale engage in unfair competition?

YES X NO _____

13. Did Richard Forbes engage in unfair competition?

YES X NO _____

14. Did Roberto Gil engage in unfair competition?

YES X NO _____

15. Did Roger Gilchrist engage in unfair competition?

YES X NO _____

If your answers to question number 12, 13, 14 and 15 are all "No," your verdict on Millionaire Gallery's claim for unfair competition is for Defendants and you should proceed to question number 18.

If your answer to question number 12, 13, 14 or 15 is "Yes," answer question 16.

16. Is Millionaire Gallery entitled to an award of damages as a result of unfair competition?

YES X NO _____

17. If your answer to question number 16 is "Yes," what is the amount of damages to which Millionaire Gallery is entitled?

\$ 492,492

18. Did Richard Forbes owe a fiduciary duty to Millionaire Gallery?

YES X NO _____

If your answer to question number 18 is "No," then your verdict on Millionaire Gallery's claim for breach of fiduciary duty is for Richard Forbes and you should proceed to sign and date this Verdict Form.

If your answer to question number 18 is "Yes," you should proceed to question number 19.

19. Did Richard Forbes breach his fiduciary duty?

YES X NO _____

If your answer to question number 19 is "No," then your verdict on Millionaire Gallery's claim for breach of fiduciary duty is for Richard Forbes and you should proceed to sign and date this Verdict Form.

If your answer to question number 19 is "Yes," you should proceed to question number 20.

20. Is Millionaire Gallery entitled to an award of damages as a result of Richard Forbes' breach of fiduciary duty?

YES X NO _____

21. If your answer to question number 20 is "Yes," what is the amount of damages to which Millionaire Gallery is entitled?

\$ 492,492

Please sign and date this Verdict below and return it to the Courtroom.

SO SAY WE ALL, this 2 day of March, 2018.

Wayne Mitchell

Foreperson (Print Name)

[Signature]

Foreperson (Sign Name)