



IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

YAACOV APELBAUM, et al.,)
Plaintiffs,)
v.) Civil Action No. 1:25-cv-147-MSN-WBP
JORDAN ARTHUR BLOOM,)
Defendant.)

SPECIAL VERDICT FORM

This special verdict form includes each of the statements which the plaintiffs allege were made by the defendant, Jordan Arthur Bloom. Answer the questions in accordance with the Court's instructions.

1. As to this statement appearing in the January 29, 2024 article "The Role of Yaacov Apelbaum in the Hunter Biden Drama: An Israeli Spy Involved in Shaping the Whole Thing.":

"Yaacov Apelbaum is an Israeli spy, and the sort of Israeli spy who would have good reasons to smear American facial recognition technology, because his company, XRVision, is a competitor."

a. Do you find by a preponderance of the evidence that this statement is actionable by satisfying each of the elements set forth in instruction J-22, as to Yaacov Apelbaum?

ANSWER YES OR NO. Y

b. If you answered "yes" to the question number 1(a), answer the following question:

State the amount of compensatory damages you believe Mr. Apelbaum should be awarded.

\$ 75,000

- c. If you awarded compensatory damages in response to question number 1(b), answer the following question:

Do you find by clear and convincing evidence that the Defendant made this statement with "actual malice?"

ANSWER YES OR NO. ~~125,000~~ ~~75,000~~ **X**

- d. If you answered "yes" to question number 1(c), answer the following question:

State the amount of punitive damages you believe Mr. Apelbaum should be awarded.

\$ 175,000.

- 2. As to this statement appearing in the January 29, 2024 article "The Role of Yaacov Apelbaum in the Hunter Biden Drama: An Israeli Spy Involved in Shaping the Whole Thing.":

"Yaacov Apelbaum is an Israeli spy, and the sort of Israeli spy who would have good reasons to smear American facial recognition technology, because his company, XRVision, is a competitor."

- a. Do you find by a preponderance of the evidence that this statement is actionable by satisfying each of the elements set forth in instruction J-22, as to XRVision, Ltd.?

ANSWER YES OR NO. **X**

- b. If you answered "yes" to the question number 2(a), answer the following questions:

State the amount of compensatory damages you believe XRVision, Ltd. should be awarded.

\$ 75,000.

- c. If you awarded compensatory damages in response to question number 2(b), answer the following question:

Do you find by clear and convincing evidence that the Defendant made this statement with "actual malice?"

ANSWER YES OR NO. X

d. If you answered "yes" to question number 2(c), answer the following question:

State the amount of punitive damages you believe XRVision, Ltd. should be awarded.

\$ 125,000.0

3. As to this statement appearing in the January 29, 2024 article "The Role of Yaacov Apelbaum in the Hunter Biden Drama: An Israeli Spy Involved in Shaping the Whole Thing.":

"So this is an Israeli spy who's deeply involved in shaping the Hunter Biden story."

a. Do you find by a preponderance of the evidence that this statement is actionable by satisfying each of the elements set forth in instruction J-22, as to Mr. Apelbaum?

ANSWER YES OR NO. X

b. If you answered "yes" to the question number 3(a), answer the following question:

State the amount of compensatory damages you believe Mr. Apelbaum should be awarded.

\$ 45,000.

c. If you awarded compensatory damages in response to question number 3(b), answer the following question:

Do you find by clear and convincing evidence that the Defendant made this statement with "actual malice?"

ANSWER YES OR NO. X

d. If you answered "yes" to question number 3(c), answer the following question:

State the amount of punitive damages you believe Mr. Apelbaum should be awarded.

\$ 125,000

4. As to this statement appearing in the January 29, 2024 article "The Role of Yaacov Apelbaum in the Hunter Biden Drama: An Israeli Spy Involved in Shaping the Whole Thing.":

"So this is an Israeli spy who's deeply involved in shaping the Hunter Biden story."

a. Do you find by a preponderance of the evidence that this statement is actionable by satisfying each of the elements set forth in instruction J-22, as to XRVision, Ltd.?

ANSWER YES OR NO. X

b. If you answered "yes" to the question number 4(a), answer the following questions:

State the amount of compensatory damages you believe XRVision, Ltd. should be awarded.

\$ 75,000

c. If you awarded compensatory damages in response to question number 4(b), answer the following question:

Do you find by clear and convincing evidence that the Defendant made this statement with "actual malice?"

ANSWER YES OR NO. X

d. If you answered "yes" to question number 4(c), answer the following question:

State the amount of punitive damages you believe XRVision, Ltd.

