

WHAT IS YOUR
THEORY OF THE WITNESS

IS THE WITNESS...

- PROVIDING ACCURATE INFORMATION
- MISTAKEN
- MISINFORMED
- INCOMPLETELY INFORMED
- LYING

IF THE WITNESS IS LYING

- IS HE CONIVING AND MALICIOUS

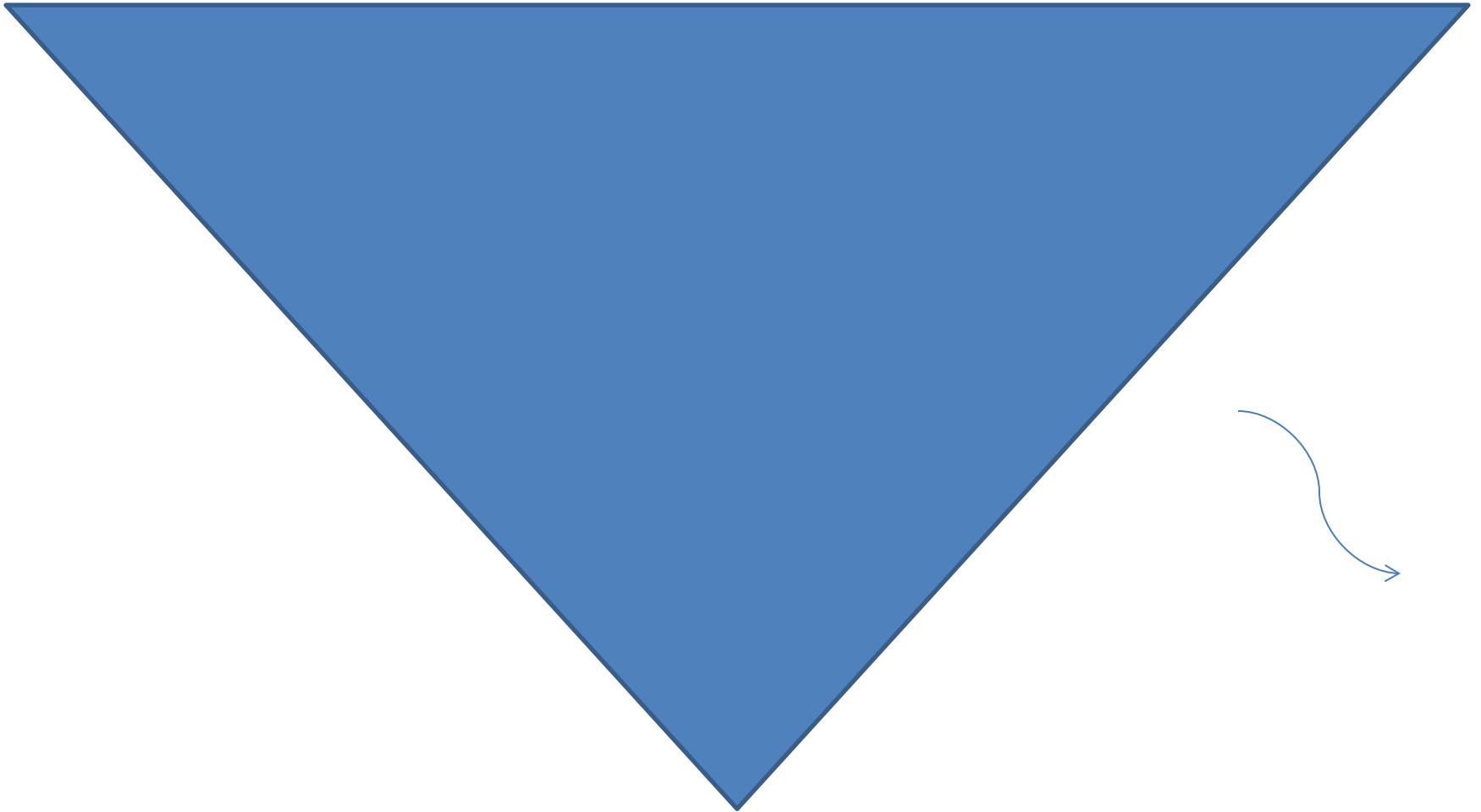
OR BECAUSE HE'S AFRAID OF SOMEONE.



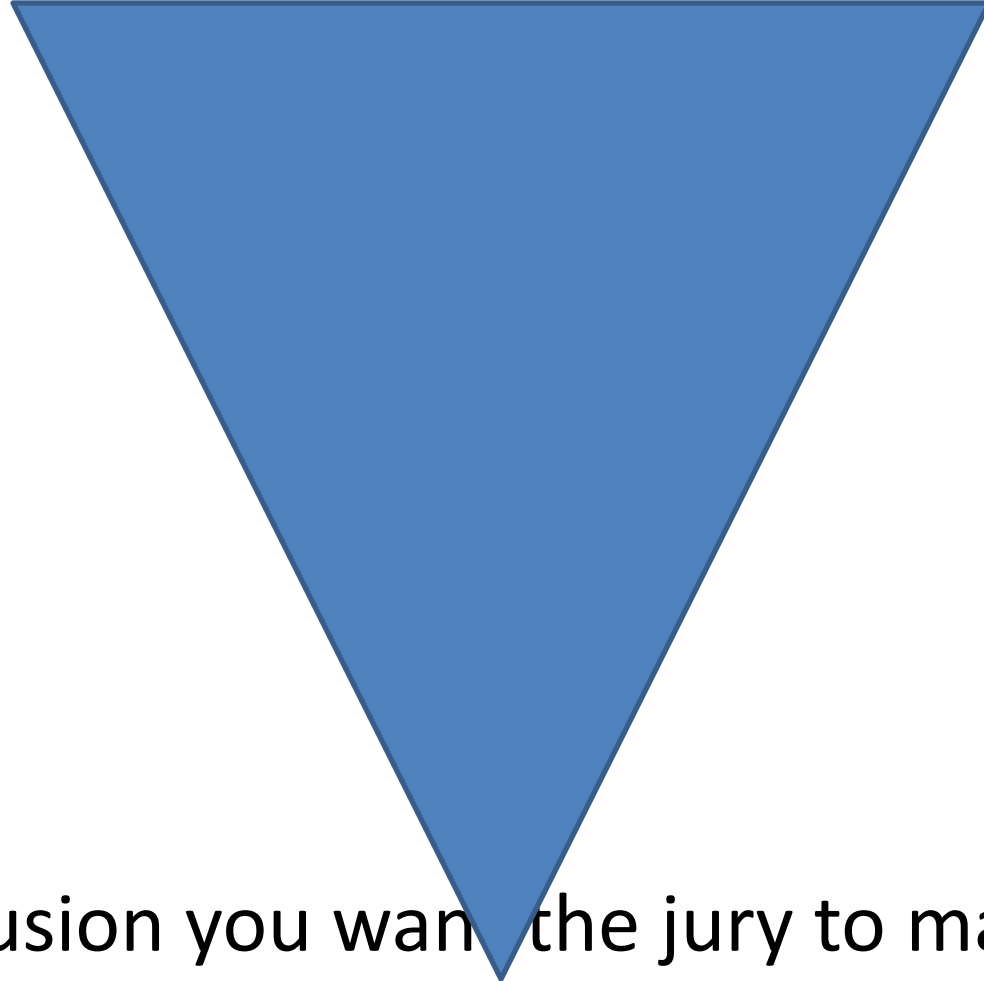
The 4 Rules for Controlling the Witness

- 1 Only Leading Questions
- 2 Only 1 new fact per question
- 3 Only short questions
- 4 Only leading to a specific conclusion

A CHAPTER OF CROSS

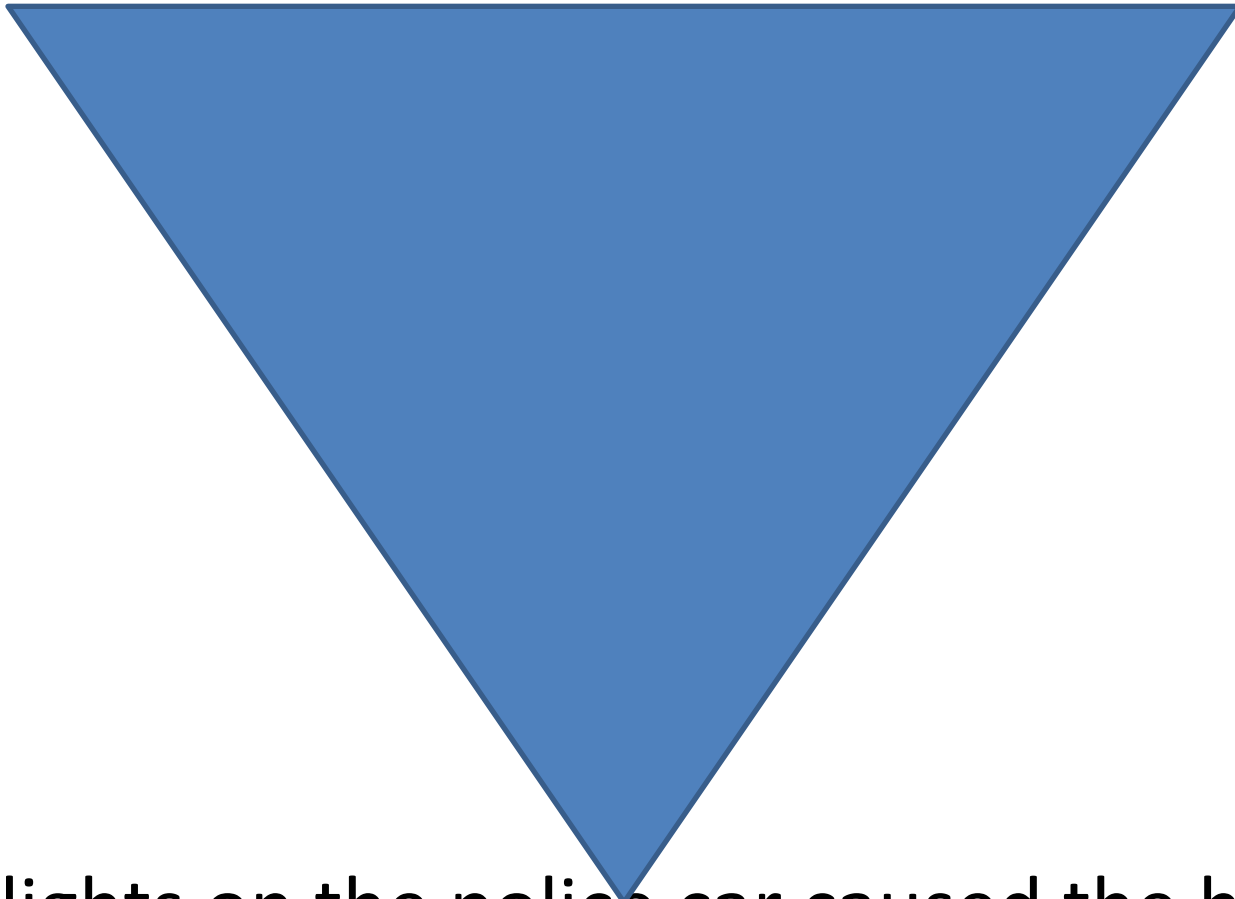


A topic important to your theory



The conclusion you want the jury to make

HGN LIGHTS



The lights on the police car caused the hgn.

HGN LIGHTS

28:23 flashing lights can cause HGN

26:7 you had flashing lights on your car
the lights are red and blue
they are bright

27:17 they are designed to be seen from a long way off

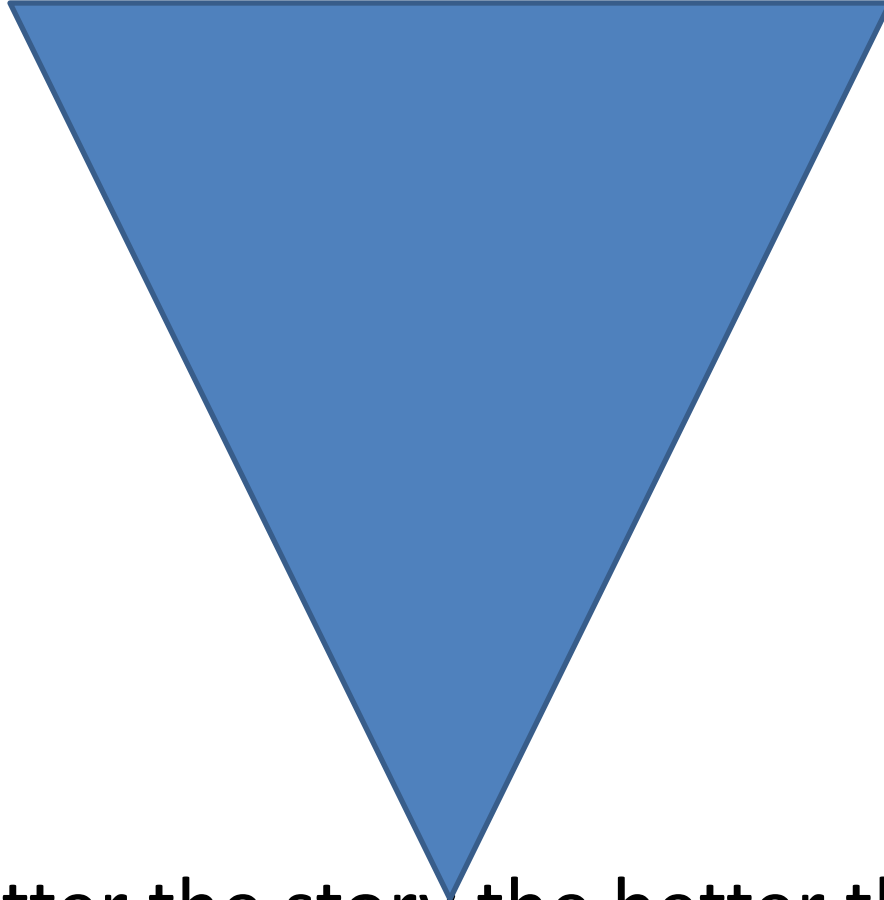
28:4 the flashing lights are very effective
they reflect off of everything

26:10 your car is parked behind Mr. W's car

26:10 those flashing lights are pointed at the rear of his car

23:3 you had him facing the rear of his car
your flashing lights were reflecting off the rear of his
car

What he gets for his testimony



The better the story the better the deal.

WORTH AND VALUE

- 1536 after the first time you talked to Det. Dailey on the phone you called again to ask if he had talked to DA
- 1536 He told you “They will not do anything, they won’t approach anybody, won’t do anything until they know what you have”
- 1538 You were worried about telling your story before you knew what it was worth
- 1539 You told him you were skeptical because once you said it they could do whatever they wanted
- 1538 Detective told you it wasn’t going to be worth anything unless you testified
- 1538 Told you that was what your protection was
- 1452 And Det. Dailey told you that the DA was going to have to determine the worth and value of the information
- worth and value means how much you get in exchange
- you are still waiting to find out how much they think your testimony is worth