



PROGRAM MATERIALS

Program #3639

April 28, 2026

**Litigation Series: Session 18 - The
Chapter Method for Cross-
Examination: Precision, Persuasion, &
Powerful Results**

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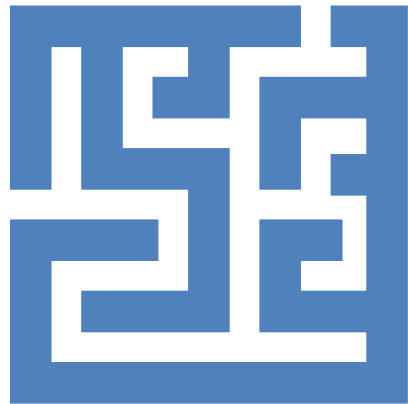
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IMPORTANT NOTE

- This presentation is an earnest attempt to introduce an approach to one of the more elusive challenges in our field, cross-examination, with clarity and practicality. By the end of this presentation, you will have tools that you can carry forward to your trial practice.
- At the same time, do not forget that litigation is inherently messy and shaped as much by uncertainty and human factors as by strict legal principles.

**EVERYONE WANTS TO BE
SUCCESSFUL UNTIL THEY SEE WHAT
IT ACTUALLY TAKES.**

When it
comes to
cross-
examination,
truer words
have never
before been
spoken.



Chapter Method Described



Cross-examination involves a sequence of brief conversations (sections) regarding specific subjects that are significant to you as the person conducting the cross-examination.



It shifts from one subject to another, not consistently following a chronological sequence.



It rarely encompasses all the information a witness could have regarding the case.

Chapter Method Explained

- Sections can occasionally connect with one another.
- At times, the shift from one chapter to another occurs *unexpectedly*.
- For individuals who appreciate assurance, sections include a *beginning* and an *end*.
- The start and end of every chapter are arranged *before* the questioning by the cross-examination starts.



Chapter Method Described



The sections are crafted to optimize the *good* proof at hand.



Consequently, they don't drift off and bore the jury. Rather, they conclude on an uplifting note.



Chapter Method Explained

- Consider this. A section that has failed to achieve its goal with the best evidence at hand is not miraculously going to get better by asking more questions.
- If the strongest evidence was ineffective, then chances are that the next best evidence, or worse yet, the *unknown* evidence, is not going to save that section.

Chapter Method Defined

- The specific subjects in a cross-examination resemble the individual acts in a play. Every chapter possesses its own distinct *purpose* or *goal*.
- The chapter approach to cross-examination is not a foot loose and fancy-free style. In this sense, it is similar to the slogan on billboards in airports throughout the country, “Winging it is not an emergency plan.” Rather, the concept behind the chapter method is that it represents the most effective *teaching* model.

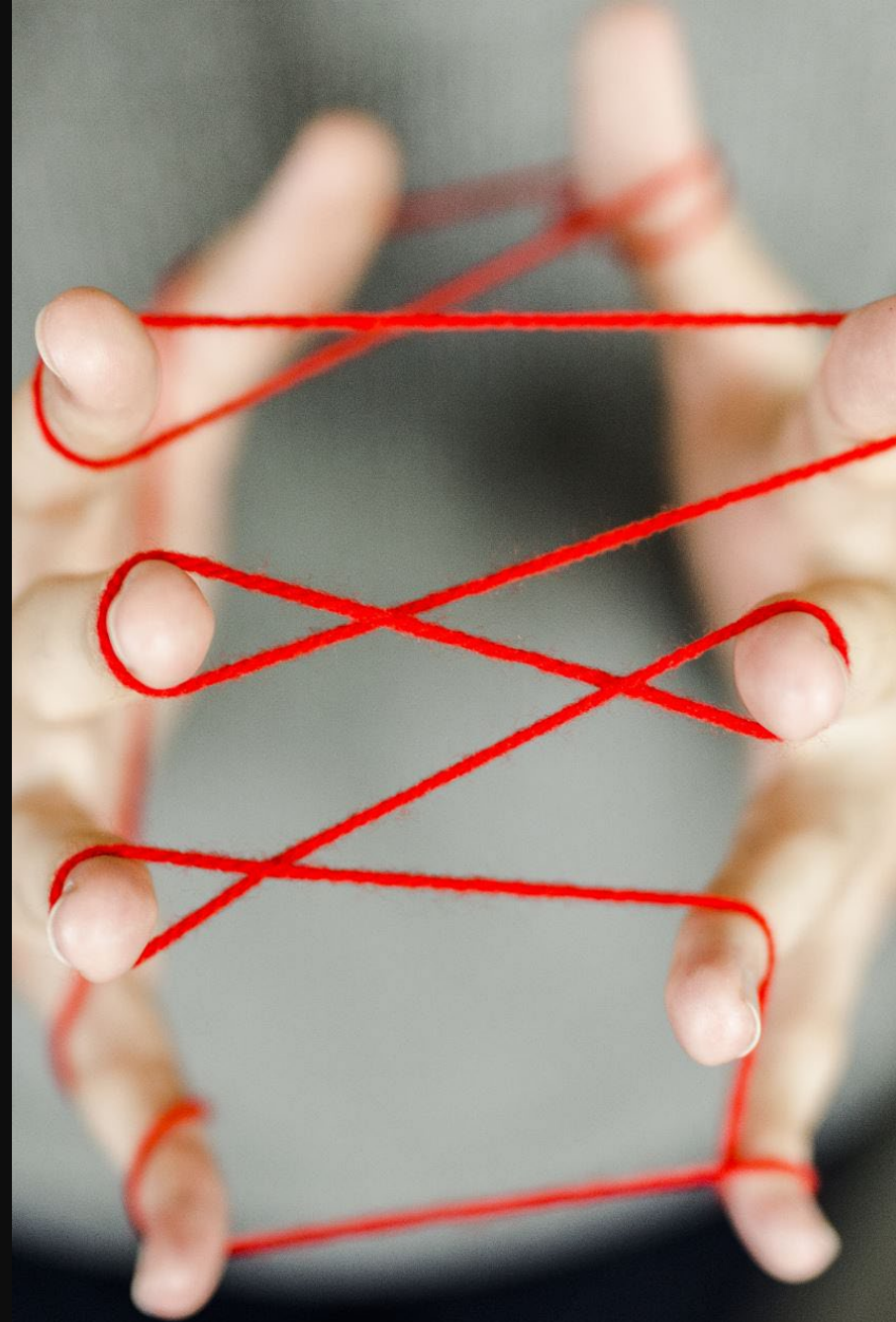


Chapter Method Explained

- This is not to imply that a lawyer who does not employ the chapter method of cross-examination is bound to unsuccessful outcomes. He might still score important points, but not in a particular order. Consequently, the jurors will face the unenviable task of piecing together the information so that it aligns with their understanding and belief systems – all in a frantic attempt to grasp the arguments presented by the lawyer. It sounds agonizing.

Chapter Defined

- Cross examination is a series of *objective-focused exercises*.
 - Each exercise consists of a collection of interconnected facts that are organized in such a way as to establish a particular point that advances your case's theory.
 - Each chapter consists of a series of *leading* questions.
 - Subjects are not confined to just one chapter. A single topic can be explored across multiple chapters.
-



Chapter Explained

- What are a few instances of a chapter “objective”?
 - To establish the existence of a fact;
 - To establish a strong foundation of evidence that will enable the jury to draw a favorable inference;
 - To present information that will diminish or erode the jury’s confidence in a different theory advanced by your adversary; or
 - To establish facts that *discredit* a witness.

Chapter Defined

- Essentially, a chapter compiles a collection of facts that leads the jury to an inescapable conclusion, even if that conclusion is *not acknowledged* by the witness.
- Sounds cunning, but it's not.
- Every chapter ought to promote a distinct theme that bolsters the case's theory.

Definition of a Chapter Bundle

- A chapter bundle comprises interconnected chapters that, when read together, paints a complete and vivid picture of a topic.
- A single topic within a cross-examination may require *several* chapters.



Chapter Approach Provides Cross-Examiner Authority Over Subjects

- The chapter technique calls for self-control. It necessitates that the questioning be a *controlled* a set of inquiries crafted to fulfill an objective.
 - The objective is to either:
 - Back your client's theory of the case; or
 - Attack your opponent's theory of the case.
-



Chapter Approach Provides Cross- Examiner Authority Over Subjects

- The advantage of the chapter approach is that you can choose only those topics that are relevant to the theory of your case. In other words, those topics that you feel are ripe for cross-examination and then separate them into distinct chapters.

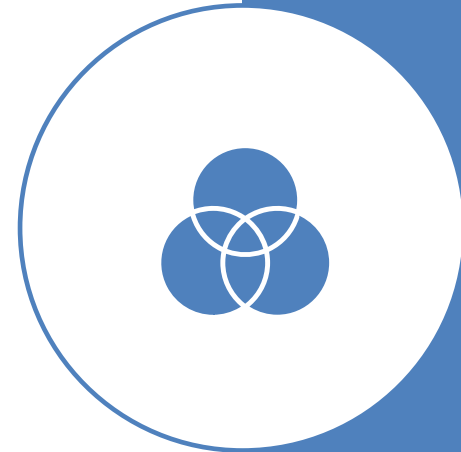
Chapter Approach Grants Cross-Examiner Control Over Witness

- The chapter approach is essential for establishing *control* of the witness.
- This is achieved by grouping questions into narrow areas.
- You can cross-examine hostile witnesses in areas of your choosing without the witness usurping control and shifting the examination into their preferred topics.



Chapter Method Develops Support for Your Case Theory

- There is an element of “proving” involved in cross-examination. When there is a gap in the narrative presented by the witness during direct examination, you can introduce facts into the case that fill that gap and “establish” some further aspect of the narrative.
- By adding specific facts to what has already been presented, you can alter the conclusions that the jury reaches.



Improved Utilization of Existing Information

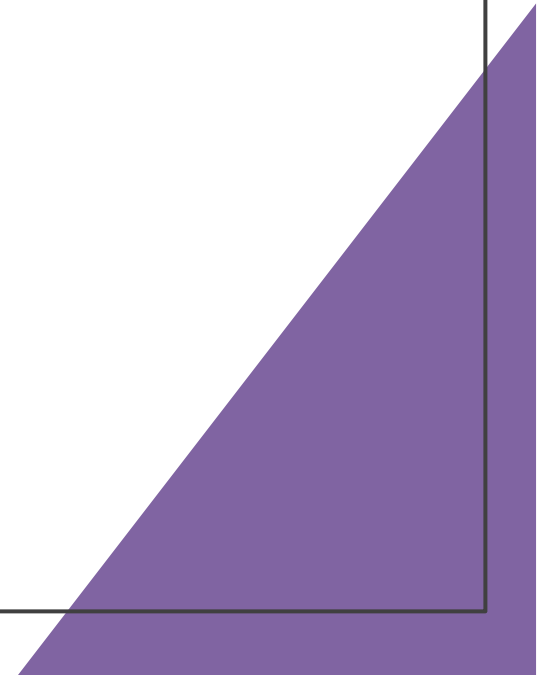
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- The chapter method requires *discipline*. It demands a deeper understanding and use of the facts. A more thorough examination of the facts is necessary.
 - There is a stark difference between knowing the facts on the one hand and knowing their purpose and the role they play in the grand scheme of things (i.e., establishing the chapter objective) on the other.
 - Of course, you can be aware of the facts on a superficial level without ever examining them.

Improved Utilization of Existing Information

- What is meant by “examining the facts?”
 - Compare the facts to each other;
 - Rearrange and group the facts into clusters of related facts, allowing for different or more robust conclusions to be drawn from them;
 - These collections of related facts (i.e., chapters) allow the jury to enjoy a real-time understanding of their importance to the theory of your case;

Improved Utilization of Existing Information

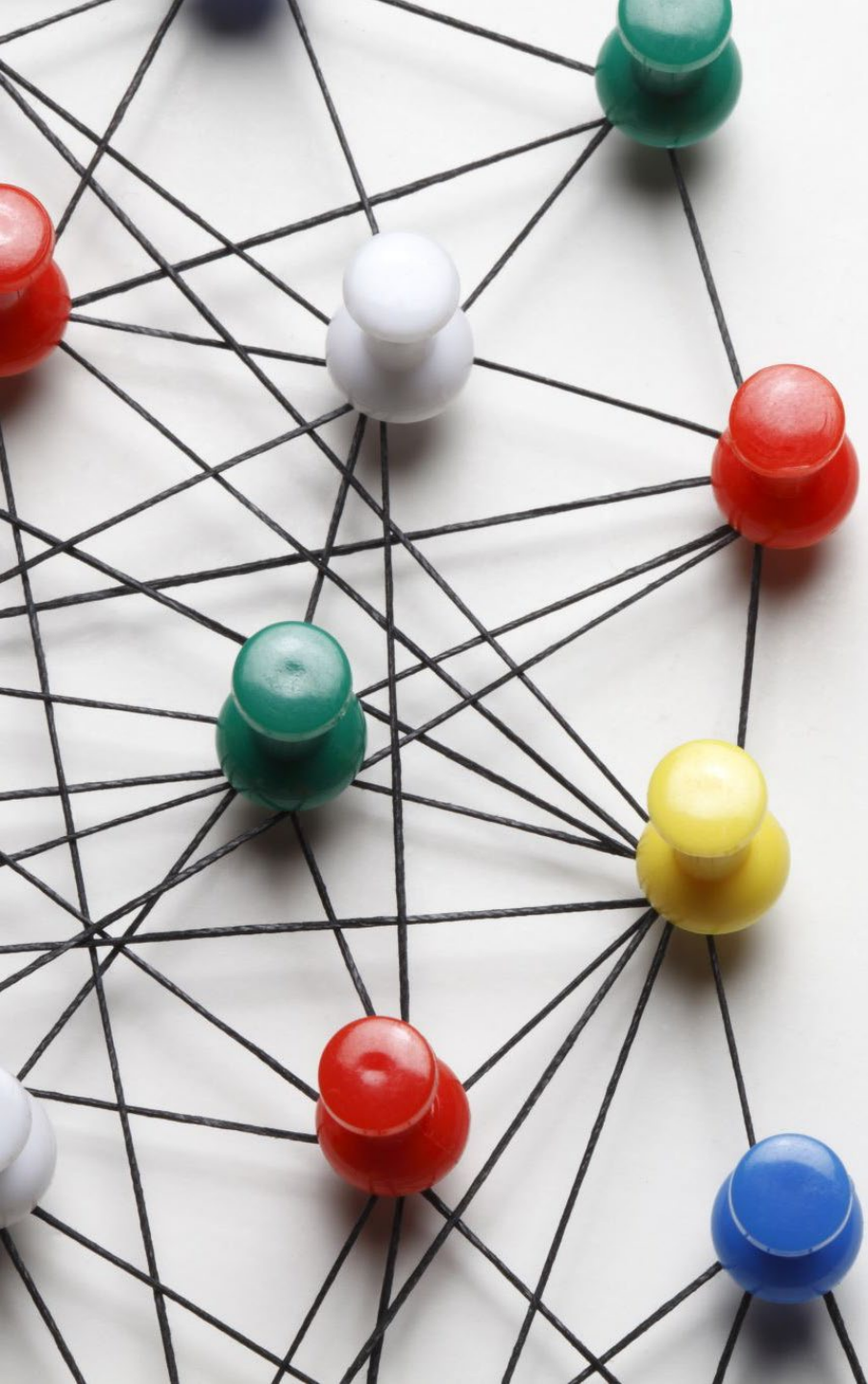
- As an added bonus, you can pivot and rearrange the order of your cross-examination sequences on the fly.



Objective of a Chapter


- A chapter consists of a set of leading questions designed to achieve a specific objective.
- The objective could be to:
 - Emphasize a fact;
 - Challenge or weaken a fact;
 - Introduce a new fact;
 - Enhance or undermine the reliability of a witness;
 - Help the jury grasp the significance of the facts in relation to the opposing theory of the case.





Aim of a Chapter

- A chapter is only worth doing if it *advances* your theory of the case or *undermines* your adversary's theory of the case.
- The purpose of drafting a chapter is to use the *best* evidence available to assist the jury in accepting the goal.
- In the course of establishing the goal, you might identify various supporting points.

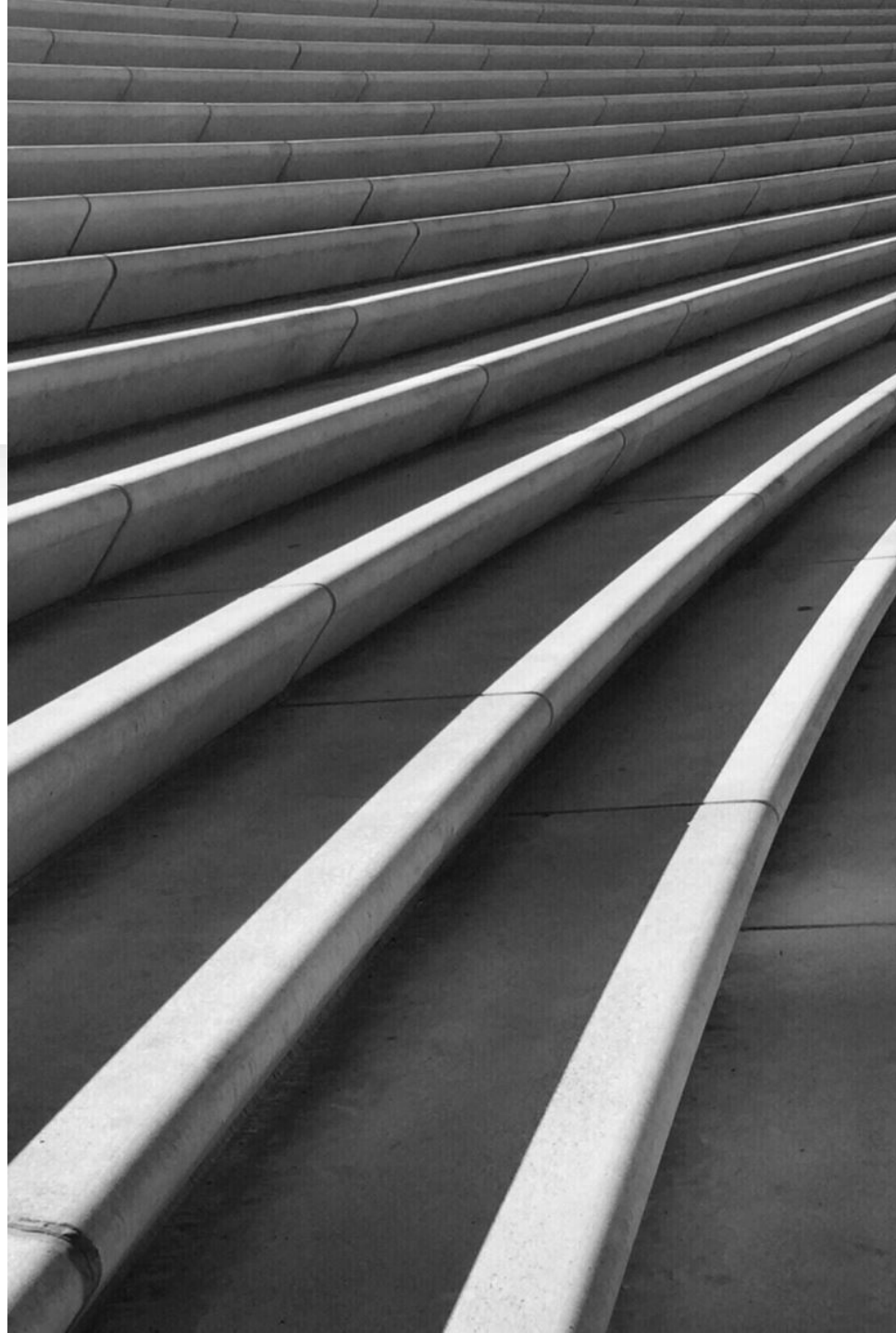


Objective of a Chapter

- For instance, impeachment through inconsistent statement aims to show that the witness's *prior statement* was *more credible* than the statement given by the witness in court on direct examination.
- Simultaneously, it *discredits* the witness by showing that he had previously testified in a manner that was *inconsistent* with his present account.

Objective of a Chapter

- Every chapter is a structured series of leading questions designed to highlight the importance of that chapter's goal.
- The cross-examiner must assemble the facts that relate to one another, ensuring that the jury isn't burdened with the unenviable task of arranging an overwhelming number of facts in a way that makes sense to them.



Dividing Cases Into Comprehensible Parts

- A complete case consists of a voluminous amount of information.
 - A crime, car crash, divorce, or any situation leading up to a lawsuit is not just one occurrence or detail, but rather a collection of facts and incidents that collectively constitute the case.
 - Individual components of cases should be separated first.
-



Dividing Cases Into Comprehensible Segments

- The chapter approach enables the trial attorney to break down even the most complicated cases into more manageable segments that are simpler to understand. This helps the jury to achieve a deeper insight into the whole case.
-

Developing Chapters: The Process

- One approach to recognizing possible chapters involves the subsequent steps:
 - (1) Break the case down into its key moments. One situation can encompass numerous events.
 - (2) Break down the crucial moments into their separate components. An individual occurrence may hold valuable insights that can only be uncovered by analyzing it on a granular level.
 - (3) Examine the separate components for helpful issues. One specific issue might need multiple chapters.

Creating Chapters: The Procedure

Commentary

- This kind of analysis is central to the chapter approach of cross-examination.

The Most Significant Subjects Meriting the Most Thorough Examination

- The key subjects in a case typically need multiple chapters to define the objectives related to that subject.
-



The Most Crucial Subjects Merit the Most Thorough Examination

- Let's discuss the *form* of the question directed to an adverse witness on cross-examination. This is undoubtedly the most challenging aspect of cross and where the novice cross-examiner faces the greatest challenges.
-





The Most Significant Subjects Are Worth the Most Thorough Cross

- Here are two examples of how *not* to phrase the question:
 - Q1: Did the auditor inform you of any financial discrepancies?
 - Critique: Too broad and surrenders control of the facts to the witness.

The Most Significant Subjects Deserve the Most Comprehensive Cross


Q2: Isn't it true that the auditor mentioned certain problems regarding the company's contract with ABC Company?

Critique: This question provides no clear picture of the facts.



The Most Significant Subjects Merit the Most Thorough Examination

- The correct form of the question is more *narrow*.



The Most Significant Subjects Require the Most Thorough Examination

- How do we craft *narrow* questions? By breaking down key moments into their individual parts, capturing these moments in time, and analyzing each one meticulously like a scientist would examine a cell under a microscope to understand how they relate to each other and what part of the completed puzzle each is meant to fill in order to create a detailed and clear representation of the facts that advance the theory of your case.



The Most Crucial Subjects Warrant the Most Thorough Examination

- The images produced by a cross this intricate are stunning.

What subjects are suitable for cross-examination?

- Examples:
 - In a situation where the defense is based on false identification, the attorney's focus should shift to drafting chapters on *inconsistencies*. Every aspect of inconsistency, like stature, mass, or facial hair, might warrant a separate section.

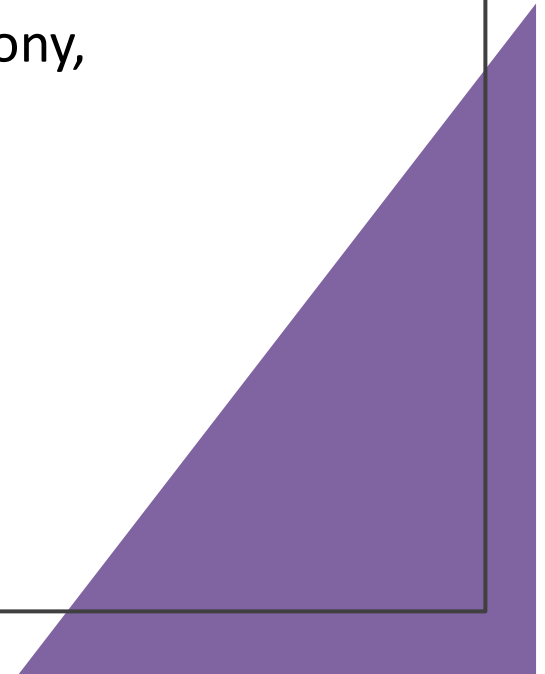
What subjects are suitable for cross-examination?

In a self-defense case, the *vitriolic* words uttered by the deceased victim merit a chapter or two.

When defending a case where the government's chief witness is a "snitch," his or her prior bad acts are ripe for the picking and will be fertile areas for cross-examination.

Placing Facts Within Their Context

- Certain facts only gain significance when considered in relation to other facts, testimony, or evidence.



Placing Facts in Perspective

- Consider the following example:
- Wanda Witness has turned to the “dark side” and has now become a witness for the State. She testified that her friend, Danny Defendant, had asked her to drive him to the Chase Bank to make a withdrawal. Based on their friendship, she agreed. Next thing Wanda knew, Danny came running out of the bank with two bags of money in one hand and a black handgun in the other. After jumping inside the car, he yelled, “Step on it.” Wanda did just that and wasn’t more than two blocks away before three cruisers took her down. Wanda was charged as a conspirator to the armed robbery for her role as the getaway driver.

Placing Information Within Context

Buried underneath a mountain of discovery is a statement made by Wanda, in which she said that she loathed Danny, ever since Danny assaulted her in a bar fight a few years prior to the heist.

When considered on its own, the initial paragraph might seem utterly useless.

Placing Facts in Context

- However, when the two sections are analyzed, both events might require cross-examination since they are interconnected and raise doubts about the Wanda's account that *the only reason why she went along with Danny was that Danny was her friend.*



Placing Facts Within Context

- Here, the strategy would be to describe the bar fight in such exquisite detail that the disdain that Wanda feels for Danny is so palpable that the jury can savor it. They should have no other choice but to summarily dismiss Wanda's story that the only reason she went along with Danny was to keep him company.

Overcoming the Impulse to Carry Out a Global Cross-Examination

- Less seasoned trial attorneys may have a tendency to conduct cross-examinations in *global* terms.
- What constitutes a global cross-examination? A cross-examination that attempts to summarize a point in conclusory terms, instead of establishing facts with a degree of heightened specificity that will allow the jury to arrive at the conclusion on their own.

Overcoming the Impulse to Carry Out a Global Cross-Examination

Global cross-examination questions can be identified from a mile away because they contain few, if any facts and attempt to get the witness to agree with a *conclusion*.

Here is an example of a global cross-examination question:
“You were driving *negligently*?”

Overcoming the Impulse to Carry Out a Global Cross-Examination

- Critique: This is a loaded question because negligence includes duty, breach, causation, and damages.

Overcoming the Impulse to Carry Out a Global Cross-Examination

The fewer the facts, the higher the likelihood that the witness will “push back” and become uncooperative by providing unfavorable answers.

Further, the cross-examiner squanders a valuable opportunity: to advance *favorable* facts.

Worldwide techniques of cross-examination relinquish authority of the cross-examination to the witness.

Overcoming the Impulse to Carry Out a Global Cross- Examination

- Proceeding one fact at a time, while arduous, is more engaging because it allows the cross-examiner to cover the best material thoroughly, accurately, and completely.

Overcoming the Impulse to Carry Out a Global Cross- Examination

Before you can move from the “old” approach to the chapter method of cross, you need to break your case down into clear and defined goals.

Every goal should have a minimum of one chapter of cross-examination. However, some goals might need a collection of chapters, commonly known as “bundles.”

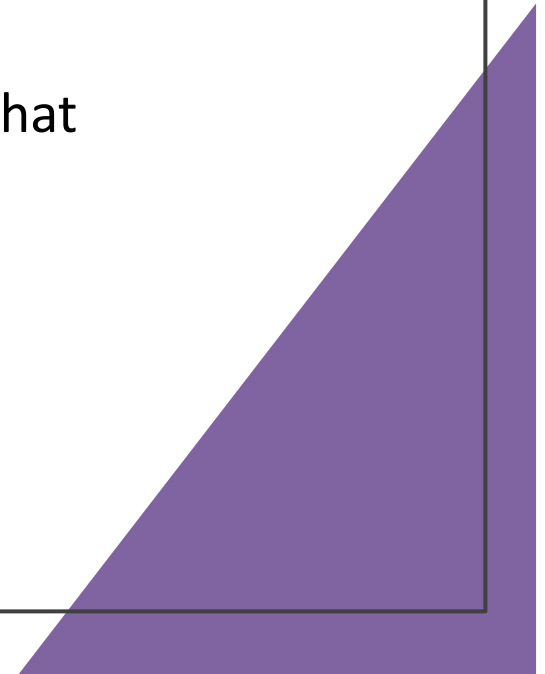
Overcoming the Impulse to Carry Out a Global Cross-Examination

- For instance, a significant event can be considered as a collection of smaller occurrences. Each of these smaller occurrences might warrant at least one chapter.
 - Like an electron microscope, the chapter method allows you to analyze the individual facts that can be marshaled together to form a chapter on an unprecedented scale.
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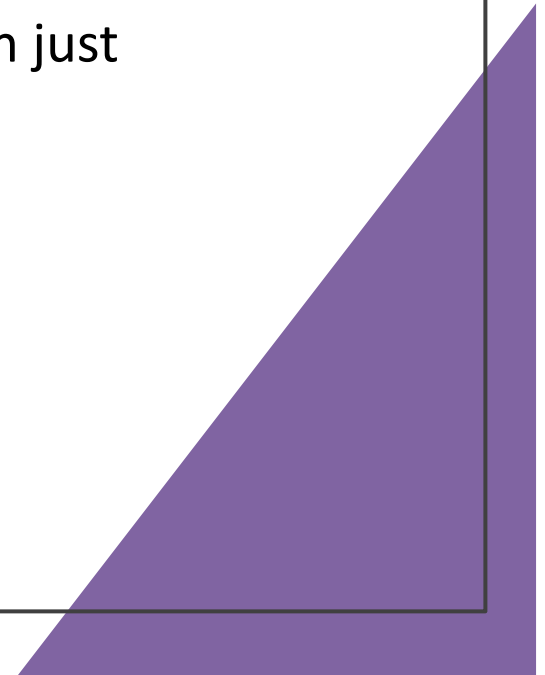
Overcoming the Impulse to Carry Out a Global Cross-Examination

- The paradox is that you might discover smaller, more intricate sections within what was previously considered a “harmful” chapter that are in fact beneficial to your case theory.



Overcoming the Impulse to Carry Out a Global Cross-Examination

- While chapters are constructed “brick by brick” one fact at a time, they represent more than just a single question or fact. Rather, they are a *series* of questions and a series of facts that result in a *goal*.





Do *bad* facts warrant a chapter?

- It depends (apologies for the lawyerly response)
- Picture this. You are defending a case based on a theory of *mistaken identification*. The witness, Charlie, identified your client from a photographic array.
- At first glance, this is absolutely devastating.



Do negative facts warrant a chapter?

- However, what if Charlie had been told, *before* arriving at the police station to view the array, that the police had a suspect (“we have arrested a suspect”), and that they wanted to see if Charlie could pick him out of the array.

Do negative facts warrant a chapter?

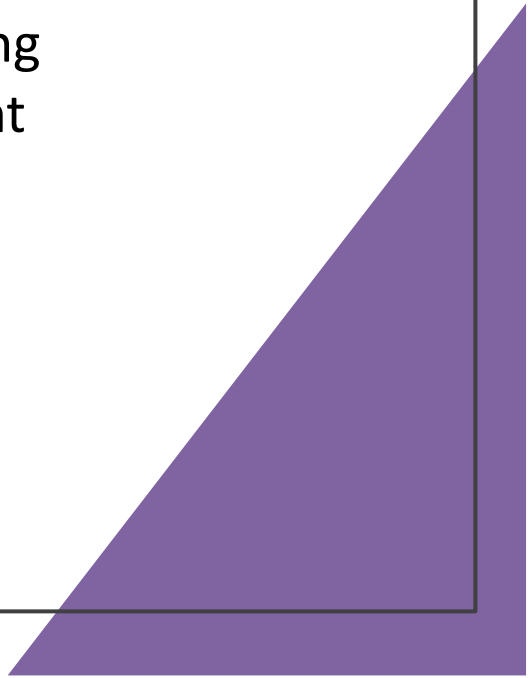
- This proof deserves a chapter.
- Why? Because these details indicate that when Charlie visited the police station, he did so with the expectation that he would be able to “identify” someone from the array since the police had “their man.”

Should negative facts warrant a chapter?

- Assume that among the six individuals in the photo array, two do not match the description provided by Charlie. Charlie described the actor as being *Hispanic and in his twenties* but two of the photos in the array consist of *African American men in their late thirties*. In this instance, you now have two extra chapters detailing how these individuals might be readily excluded.


Do negative facts warrant a chapter?

- Imagine that Charlie observed the array for eighteen minutes before positively identifying your client. This unusual length of time might deserve a chapter.



Do negative facts merit a chapter?

- If, after Charlie circles a number, Detective Smith makes a *confirmatory* comment like, “Yes, that was what we thought,” there is yet another section.
- Detective Smith has provided *assurances* to Charlie that he made the right choice.
- It’s no surprise that Charlie will keep on “placing the blame” on this “unlucky individual” for the duration of the case.



Do negative facts warrant a chapter?

- Undoubtedly, Charlie's choice of your client in the array is a *bad* fact. There is no question that the prosecutor will savor the opportunity to walk Charlie through his selection of your client's photograph slowly and deliberately on direct examination.
 - But your thorough evaluation has produced several chapters that can cast *doubt* on the reliability of the array.
-

Do unfavorable facts warrant a chapter?

- At the very least, it places the prosecutor in a difficult position. He has to return on re-direct to cover a significant issue that didn't receive so much as a whisper on direct. The jury might ponder, "Was the prosecutor attempting to conceal something from us?" The prosecutor will need to clarify to the jury why Charlie's testimony ominously omitted several details that were brought up on cross.

Do unfavorable facts warrant a chapter?

- No single fact can produce the vivid imagery generated by chapters on its own. Rather, you need to assemble related facts “brick by brick” until you’ve built a chapter that advances a single goal.



How lengthy should a chapter be?

How lengthy should a chapter be? Only as lengthy as *the number of favorable facts that exist to achieve that chapter's goal.*

It goes without saying that within an event, there is often more than just one important point.

When an event or topic has multiple goals, more than one chapter will be required.

How long should a chapter be?

Example: Johnny, your client, was assaulted by the police during his arrest. It was recorded on video.

The actual beating of Johnny is an event that could be divided into *multiple* chapters.

For instance, to highlight the cruel and irrational quality of the beating, you could cross-examine on each separate blow delivered by the officers.

How long should a chapter be?

- After covering the absence of justification for the strike, the energy behind the strike, the target of the strike, and the method of delivery (whether it was a kick, punch, elbow, or club), the cross-examination would transition to the next blow, marking the next chapter. Ironically, the way you would progress through the cross-examination – i.e., “blow by blow” – would become a metaphor for what actually happened.

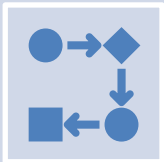
How long should a chapter be?

- As you can see, the questioning of an officer who took part in this senseless act would extend well beyond just one chapter entitled, “the beating.”

Draft Chapters in Reverse



A simple method for developing chapters involves a four-step procedure outlined by Larry Pozner and Roger Dodd in their publication, “Cross-examination: Science and Techniques.”



This procedure can be simplified to three words: “Create sections *backwards*.”

Draft Chapters in Reverse

- Here are the four stages:
 - Step 1: “Determine a specific factual objective to accomplish during the cross-examination that is [*consistent*] with the theory of the case.”
 - Step 2: “Examine cross-examination preparation resources for all details that contribute to the acceptance of that single factual goal.”

Draft Chapters in Reverse

Step 3: “Draft one chapter that includes those facts, leading to the factual goal as set out.”

Step 4: “If, during the process of writing a chapter an additional worthwhile goal is discovered, separate that goal and its supporting content into a distinct chapter.”



Draft Chapters in Reverse

- The good news is that most attorneys are already employing these steps without even knowing it.
- Thus, adjusting to the remainder of the system will feel instinctive and practical.

Step 1: Choose a Particular Factual Objective

- Effective cross-examination cannot be executed “on the fly” or by “winging it.” Asking random and arbitrary questions is not a game plan.
- Never forget the goal of the cross-examination as highlighted by Pozner and Dodd: “To promote [your] case theory or to weaken [your] adversary’s case theory.”

Step 1: Choose a Particular Factual Objective

- I hate to be the bearer of bad news but trials are never won by casting one fatal blow. Perry Mason moments are few and far between.
- As Pozner and Dodd so eloquently state, “the credibility of witnesses and cases bleed to death from a thousand little pin-pricks.”

Step 1: Choose a Particular Factual Objective

- The key concept here is that every factual goal must be demonstrated *separately*, even if it might be closely related to a similar goal.
 - For instance, if it is important to demonstrate that the robber had no tattoos, then that specific topic would deserve a separate topic and should be drafted independently from all other chapters addressing the countless other characteristics of the robber's description.
-



Step 1: Choose a Particular Factual Objective

- In a non-chapter arrangement, your notes may resemble the following:
 - Description
 - Blue jeans
 - Tattoos
 - Height
 - Body shape
-



Step 1: Choose a Particular Factual Objective

- Working from such a short-hand set of notes, the attorney would be likely to cross-examine on these issues *generally*, without establishing the goal.
 - By asking the least number of questions necessary to set up the goal, you will deprive the jury of the factual detail and specificity that they need to make a factual conclusion or inference that favors your theory of the case.
-



Step 1: Choose a Particular Factual Objective

- It also takes away the chance for you to demonstrate to the jury your strong command of the facts of the case.
 - You also do not convince the jury that when it comes to credibility, it is best to accept your account of the events rather than your adversary's because you are candid and forthcoming.
-



Comprehensive Notes for Comprehensive Chapters

- Consider the following example: A prior felony conviction of a *State's witness*. To mitigate the effect of this revelation on cross-examination, the prosecutor decides strategically to elicit from his witness *on direct that he possesses a criminal conviction*.
 - During cross-examination, the defense may re-establish the fact that the witness has been convicted of a felony.
-



Comprehensive Notes for Comprehensive Chapters

- Most defense attorneys would ask the following abbreviated questions on cross:
 - Q: Mr. Smith, you are a convicted felon?
 - Q: In 1988, you were convicted of a robbery?
 - Q: You got sentenced to prison for five years?

Comprehensive Notes for Comprehensive Chapters

- Although the defense lawyer closely followed the essential principles of cross-examination, you can sense that something is amiss.
- While the lawyer established the goal-fact – repetition of the fact that the witness is a convicted felon – he did so without any *drama*.

Comprehensive Notes for In- Depth Chapters

- The felony conviction is a *cold* fact – it evokes no inferences. There is nothing evocative about this chapter, aside from the fact that the witness was found guilty of a robbery and served a prison sentence.

Comprehensive Notes for Comprehensive Chapters


- In fact, if the witness had been coached well and was properly prepared, he might even generate some sympathy from the jury when he explains how the time spent away from his family was intolerable and that he was eager for the days to pass until he could return home to embrace his newborn child. Additionally, he stood up, took responsibility, and “paid [his] debt to society.”

Comprehensive Notes for Comprehensive Chapters


- Can you come up with a more meaningful purpose for this chapter?
- Suppose that you draft this chapter with the purpose of challenging the witness's *credibility*, so that the jury will conclude that he is a bald-faced liar and *cannot* be trusted.
- However, the questions posed earlier contain such little detail that they amount to nothing more than a news reporter making idle observations. We must delve deeper!

Comprehensive Notes for Comprehensive Chapters

The summary nature of this chapter is so utterly benign that it wrings out all of the emotion and drama from it.



It doesn't show how this damning fact bears on the credibility of the witness.



The good news is that it does not require a complete makeover in order to “fix” this snafu.

Comprehensive Remarks for Comprehensive Chapters

- Fundamentally, we can begin by breaking down the witness's prior felony conviction into smaller parts (i.e., divide them into additional chapters), with each chapter containing more detail and factual context.
-



Comprehensive Notes for Comprehensive Chapters

- You might choose to divide the prior felony into four distinct yet interconnected chapters:
 - Facts of armed robbery;
 - The deal;
 - The sentence; and
 - The duration completed.

Thorough Notes for Thorough Chapters

Here's an example of a cross-examination of each of these chapters.

Example

- You are an armed robber
(Chapter heading)
 - Q: I'd like to ask you some questions about October 29, 2007?
 - Q: You remember that day don't you?
 - Q: That was the day you were arrested?
 - Q: Not for jay walking?
 - Q: Not for walking your dog without a leash?
 - Q: Not for DUI?
-



Example

- Q: But for robbery?
- Q: On this day, you walked up with a gun in your waistband to a liquor store in your own neighborhood?
- Q: A .44 magnum revolver?
- Q: It was loaded with six bullets?
- Q: From outside the window you looked in?
- Q: You looked back?

Example

- Q: You looked all around?
- Q: You looked in and saw that there was only one man inside the store?
- Q: A middle-aged man standing behind the counter?
- Q: You went in that door, ran up to that man, and put that gun to his head?
- Q: You said, “Give me the money or I’ll blow your brains out?”
- Q: “You can bank on it.”

Example

- Q: He did as you ordered?
 - Q: That armed robbery didn't go exactly according to plan?
 - Q: Because in that store you didn't know that, although you traumatized another human being, there was a panic button under the counter?
 - Q: A little button set up so that robbers can't run roughshod over an entire part of town?
 - Q: You ran out of the store?
-



Example

- Q: You didn't get a half-a-block away before you heard the sirens?
- Q: You ran faster?
- Q: Within a block of that store, the police were on you?
- Q: You dropped your weapon?
- Q: You were arrested?
- Q: In one hand your gun, your trusty friend?
- Q: In the other hand, a bag of money?
- Q: Someone else's money?

Example

- Q: You were cuffed and taken to the police station on Carson Avenue?





Example

- You Got A Deal (Chapter Heading)
 - Q: I'd like to talk to you about what happened on December 15, the day of your jury trial?
 - Q: You got up early?
 - Q: You put on your trial suit?
 - Q: You got on the early bus to the courthouse?
 - Q: You knew nothing positive could happen at that jury trial?
 - Q: You met with your lawyer?
 - Q: You discussed the case?
 - Q: Over and over?

Example

- Q: You talked about any chance the clerk might not show up for waiving that gun at his head and threatening his life?
- Q: You knew that wasn't going to happen?
- Q: You knew twelve jurors were going to convict you in a skinny minute?
- Q: You also knew that once you were convicted, you were going to get the maximum sentence under the law for armed robbery?
- Q: Twenty years?
- Q: Day for day?
- Q: No early release for a violent felon?
- Q: You were doing the math in your head as fast as you could and said, "I guess I'll be out some time around Halloween 2027?"

Example

Q: Your lawyer came into the holding area early that morning?

Q: She sat down and talked to you?

Q: You were running through all of the things that you might say?

Q: And what might happen if you just pleaded guilty ... what you might face?

Q: She said, "With the nature of the crime, expect the max?"


Example

- Q: You expected to pick that jury at 10 AM in Judge Smith's courtroom on the fourth floor?
- Q: You looked for a way out?
- A: No.
- Q: Well you weren't looking for a way into the trial were you?
- A: No.
- Q: So you looked for a way out?

Example

- Q: Your lawyer told you there are none?
- Q: But they think you might have evidence on Bobby?
- Q: They think you might know something and that might give me the leverage to help you?
- Q: You paused and you paused and you paused. And you realized, the smart thing, the only thing was to point the finger at Bobby?

Example

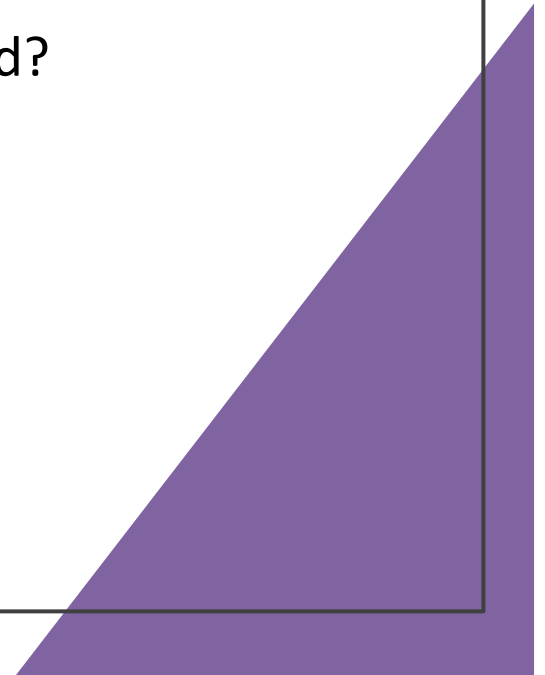
- Q: Let's talk about this deal?
 - Q: You're saying that you played a major role and conspired to kill a police officer?
 - Q: That carries life without any possibility of parole?
 - Q: You got immunity?
 - Q: That means no prosecution?
 - Q: That means no charge?
 - Q: For all practical purposes, it was as if you were never even there?
- 

Example

- Q: This armed robbery that you were going to do five to twenty years day-for-day, that got wiped away?
- Q: That got downgraded to a non-violent felony?
- Q: Like a purse snatching?
- Q: Your lawyer went through the math with you?
- Q: She went through that on zero to five, worse case scenario, you get the whole five?

Example

- Q: Sixty months?
- Q: You can do that standing on your head?




Example

- You got the deal of the century! (Chapter heading)
 - Sixty Months Isn't Really Sixty Months (Sub-chapter 1)
 - Q: Then your lawyer went through what sixty months *really* means when it's a non-violent charge?
 - Q: She went through that with good time, that knocks off twenty percent of the sentence?
 - Q: One year?
 - Q: You're down to 48 months?
 - Q: She told you that with work credit, here's the kicker: you don't even have to work to get the credit. All you have to do is not refuse to work and you get ten percent off of that 48 months, right?

Example

- Q: That becomes more than four and a half months off?
- Q: You're down to 43 months?
- Q: And that's before early release?
- Q: Early release is for people with non-violent charges because we need the prisons filled up with violent offenders who waive guns at people and threaten lives?

Example

- Q: The early out for you non-violent guys is 50% off the 43 months?
 - Q: You're looking at 21 ½ months?
 - Q: This comes as no surprise to you?
 - Q: It might surprise the people in the jury box?
 - Q: But it doesn't surprise you at all?
- 

Example

- Credit for time-served (Sub-chapter 2)
- Q: You know that you get credit for this year you've been incarcerated?
- Q: Every day?
- Q: You have eleven months and counting as of today?
- Q: If you get the maximum sentence from His Honor, the worst case scenario is that you'll miss the next fourth of July 2009 but you'll be home shortly after that?
- Q: And you'll be home with no supervision?
- Q: No reporting requirements?
- Q: No parole or probation hassles?



Example

- Anticipated Sentence (Chapter Heading)
 - Q: It gets even better than next July, doesn't it?
 - Q: Because your lawyer is talking to you about this as the *worst case scenario* – coming home around baseball season?
 - Q: Your lawyer also talked to you about the *best case scenario*?
 - Q: The best case scenario is that as soon as this trial's over, your lawyer is going to turn to this same judge and say, "My client played a key role for the government. Another eleven months won't do him any good. He should be given credit for time-served and be released today?"



Example

- Q: And you expect to be released next week?
- Q: And when you come in front of His Honor after this trial is over, you're going to walk in here and stand behind this podium?
- Q: You're going to raise your right hand and swear to tell the truth?
- Q: You're going to look His Honor in the eye?
- Q: Just like you looked these jurors?
- Q: Just like you looked that poor store clerk?



Example

- Q: And what are you going to say?
- Q: You're going to say, "It's the honest to god truth judge, I wouldn't tell a lie. I won't get in trouble again. Release me today?"
- Q: Are you going to say, "Judge, it's the absolute truth. I won't commit another crime?"
- Q: Are you going to say, "Judge, you can bank on it. I won't be back?"

Commentary

- By breaking down the prior felony conviction, you have proven to the jury why it should not believe this witness because he has too much to lose by *not* telling an exaggerated tale that makes it appear as though he has firsthand knowledge that your client shot and killed a police officer.

Commentary

- It is far more powerful than a bare bones cross-examination that lets the witness off the hook by merely repeating what the prosecutor had already established on direct: that the witness is a convicted felon who served a four-year prison sentence.

Commentary

- The specificity relied upon in the sample cross leaves a bad taste in the jury's mouth that this witness deliberately manufactured an elaborate story that he then sold to the police in order to save his own hide. In doing so, he threw an innocent man under the bus without the slightest bit of remorse. And if he has already done it once, how can we believe that he won't do it again?
- Indeed, the way the jury feels about a witness is often *more important* than the intellectual response.

Each Chapter Requires a Title

- Every chapter must have a specific factual goal.
- The materials gathered for the chapters are not disparate fragments, but rather facts that are interconnected.
- Chapter titles are beneficial not only in preparing for cross-examination but also for closing argument.
- Since the cross-examiner has pinpointed the chapters that advance the theory of his case, the same topics may be used in closing argument.

Step 2: Creating a Chapter

- Guideline: Examine the discovery in pursuit of facts that inescapably lead to acceptance of a singular factual goal. Do this for every chapter.
 - Drafting chapter for cross-examination is a spiraling process.
 - The question is, “Is it possible to organize discovery into useful chapters before establishing your goals for cross-examination, or should goals be decided in advance of organizing the discovery into chapters?”
-



Step 2: Creating a Chapter

Personally, I start by examining the discovery and conducting a client intake interview.

This helps me brainstorm a general theory of the case, such as “self-defense.”

This preliminary theory suggests clear goals. These goals, in turn, assist me in refining my search of the discovery for useful cross-examination material.

Step 2: Creating a Chapter

- As I sort the discovery into groups that promote a specific goal, more goals may emerge. This leads to the formation of additional groupings.
 - Preparing for cross-examination is not a straightforward process. Sparks will begin to fly inside your head as your motor neurons become activated.
 - One chapter may inspire another.
-



Step 2: Creating a Chapter

- While you are drafting a chapter, you might recognize that it has more than one goal. And new goals may require their own chapters.
 - This can become harrowing. To preserve your sanity, I suggest having a notepad nearby so that if a fresh idea pops into your head, you can write it down before it becomes lost in the deepest recesses of your mind never to surface again.
-

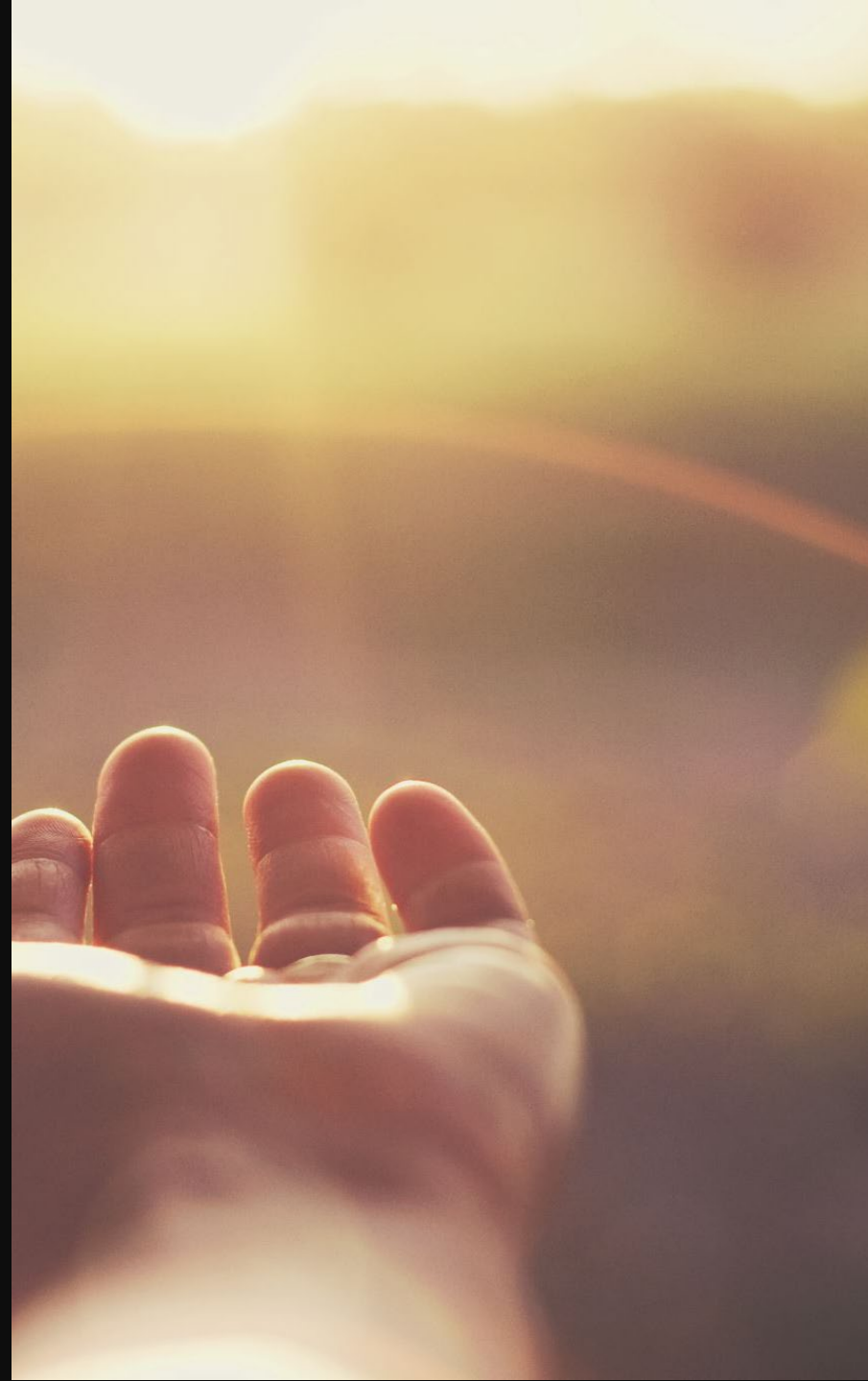


Chapters Give Insight to an Event

- How do you uncover facts that promote or advance a factual goal?
- I approach this by imagining a chapter as a scene from a play. By doing this, I seek out details that enliven the scene.
- The goal is to enhance the scene's clarity for the jury.

Chapters Provide Clarity to an Event

- Ambiguity is to the cross-examiner what fright is to the performer: an uninvited guest.
 - Chapters, by their very nature, seek to shine a light on an ambiguous aspect of direct examination. If the cross-examiner wanted a witness's testimony on direct to remain murky, then he wouldn't have cross-examined on it in the first place.
-



Chapters Provide Insight into an Event

- Inherent in a cross-examiner's decision to cross-examine a witness on a particular topic is the idea that he has made a tactical decision to highlight a goal more thoroughly than it was addressed on direct examination.
-



Chapters Provide Insight into an Event

- Of course, the version offered during cross-examination may be diametrically opposite to the one given during direct examination, thus creating an ambiguity as to the *reality* of that fact. But that's why there is a trial in the first place: there are two competing versions of an event and it's the jury's job, as the judge of the facts, to determine which one is more believable.
- Facts are the tools of the trade.

Vivid Chapters Help Jury To Accept A Prior Statement As More Accurate

- Introducing an alternative explanation is at the heart of impeachment by inconsistent statement.
 - On cross-examination, the attorney wants the witness to establish a prior version of an event with great clarity, in order to cast doubt on the version testified to on direct.
-



Vivid Chapters Assist Jury In Recognizing A Previous Statement As More Precise

- As Pozner and Dodd so eloquently state in their book, impeachment by inconsistent statement is “similar to a double exposure of the film.” “The picture may itself have been well defined, but after the cross-examination there is a double exposure that makes the [jury’s] vision less certain.”

Step 3: Gathering Facts to Support the Goal

- Imagine that your opponent has enlisted a specialist in psychiatry to provide an opinion within a reasonable level of medical certainty regarding a psychiatric diagnosis. To enhance the credibility of this expert, your opponent has highlighted the fact that he has authored ten articles in several of the most esteemed psychiatric journals.
 - The significance of this information lies in its ability to help your opponent validate the trustworthiness of his expert, enabling the jury to recognize him as an expert in the field of psychiatry.
-



Step 3: Gathering Facts in Favor of the Goal

- Keep in mind that cross-examination is methodical. An effective cross-examination unfolds one goal at a time.
 - In this scenario, one of your primary goals is to discredit the witness's credibility so as to undermine the juror's trust in his opinion.
-

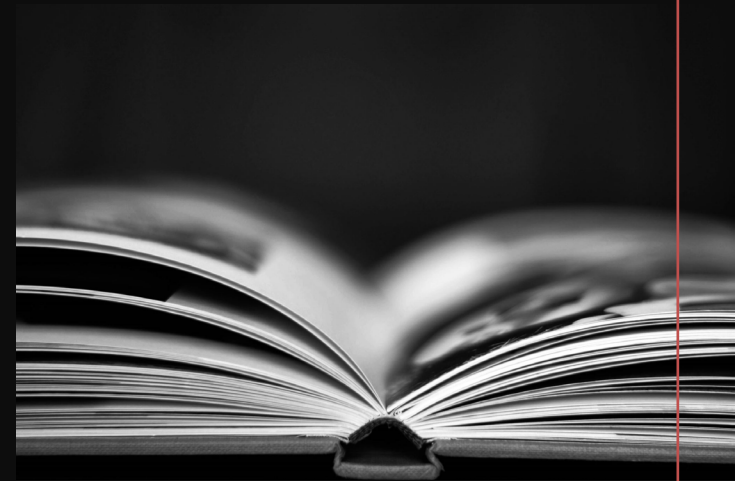


Step 3: Gathering Facts to Support the Goal

- Before blindly accepting the fact that the psychiatrist is adequately qualified to provide testimony and bypassing the creation of a chapter to challenge his credentials, pause and consider the question: “Are any of these publications related to the topic of psychiatric diagnosis, the ultimate opinion for which he has been called to testify?”

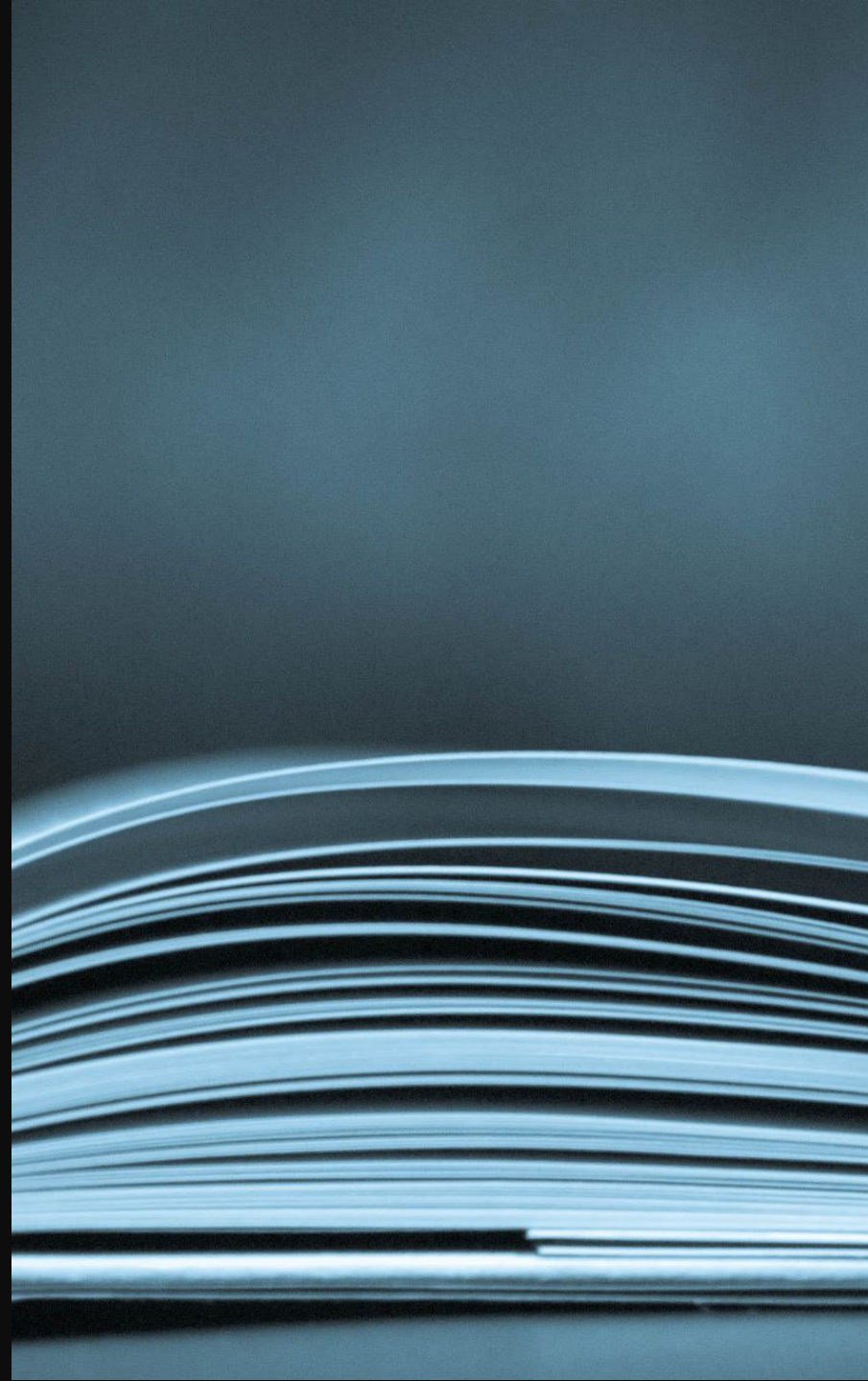
Step 3: Gathering Facts in Favor of the Goal

- If not, then you can begin writing a chapter based on the fact that none of the expert's publications even remotely relate to psychiatric diagnosis.
- This would be a single chapter that unites together the available facts that undermine the importance of the witness's ten publications.
- The credibility of a witness is enhanced or diminished by factual chapters, and this chapter demonstrates that.



Step 3: Gathering Facts to Support the Goal

- Chapter: Publications
 - Q: Everything you published was listed on your resume?
 - Q: You are particularly proud of your articles?
 - Q: Publishing an article demonstrates where your interests lie?
Q: Doing research in an area helps you to develop expertise in an area?
 - Q: From 1998 to 2006, you published ten articles?
-



Step 3: Gathering Facts to Support the Goal

- Q: Every one of your articles was about hospital administration?
- Q: Your articles are all about this single administrative issue?
- Q: None of your articles addressed psychiatric diagnosis?

Conclusion of chapter.

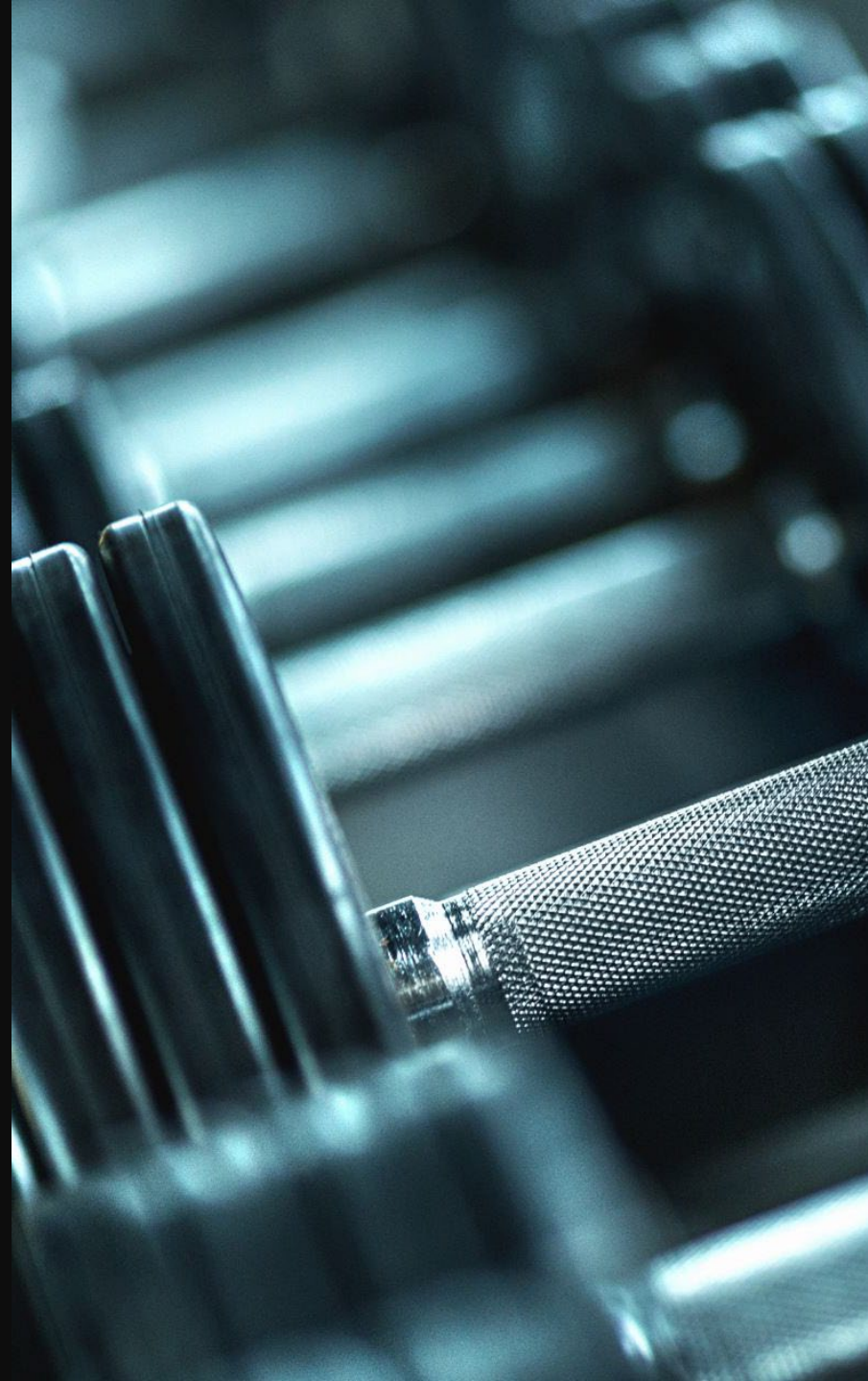


Step 3: Gathering Facts to Support the Goal

- There is no conclusion: “So, you aren't truly a specialist in psychiatry?”
- The chapter earned every point it was able to.
- The cross-examiner has marshaled together strong facts to discredit the expert on the single point that his publications somehow distinguish him as a person whose opinion on a psychiatric diagnosis is to be trusted.

Step 3: Gathering Facts in Favor of the Goal

- Although the expert may still be deemed reliable, the fact that he has published ten articles no longer holds the same weight that it once did. In fact, the mere fact that the expert is published at all is unlikely to influence the jury's assessment of his reliability regarding the ultimate issue of psychiatric diagnosis.
 - Seeing this, your adversary might be less inclined to use this fact to bolster his expert's credibility.
-



Step 3: Gathering Facts to Support the Goal

- No single chapter will strike the fatal blow or be the coup d'état.
- The accumulation of chapters, although not particularly exciting, is quite reliable as it accomplishes the goal of discrediting the expert and eroding the jury's confidence in his opinion.

Conclusions
can be
disputed.
Facts
cannot.

- Conclusions are like the “Mean One, Mr. Grinch”: witnesses dispute them.
- The chapter method prevents us from falling into this perilous trap.
- Using the chapter method, the attorney can present potent facts that are so compelling that the jury can’t help but to agree with the attorney’s desired conclusion, *even though the witness was never explicitly asked to agree with that conclusion on cross-examination.*

Conclusions
can be
disputed.
Facts
cannot.

- Consider the following example from the creative genius of Pozner and Dodd in their book, “Cross-Examination: Science & Techniques.”
- The cross-examiner wants to establish that the opposing witness was *under great financial distress*.
- The witness will never concede this conclusion. In fact, you can count on him to vigorously dispute it.

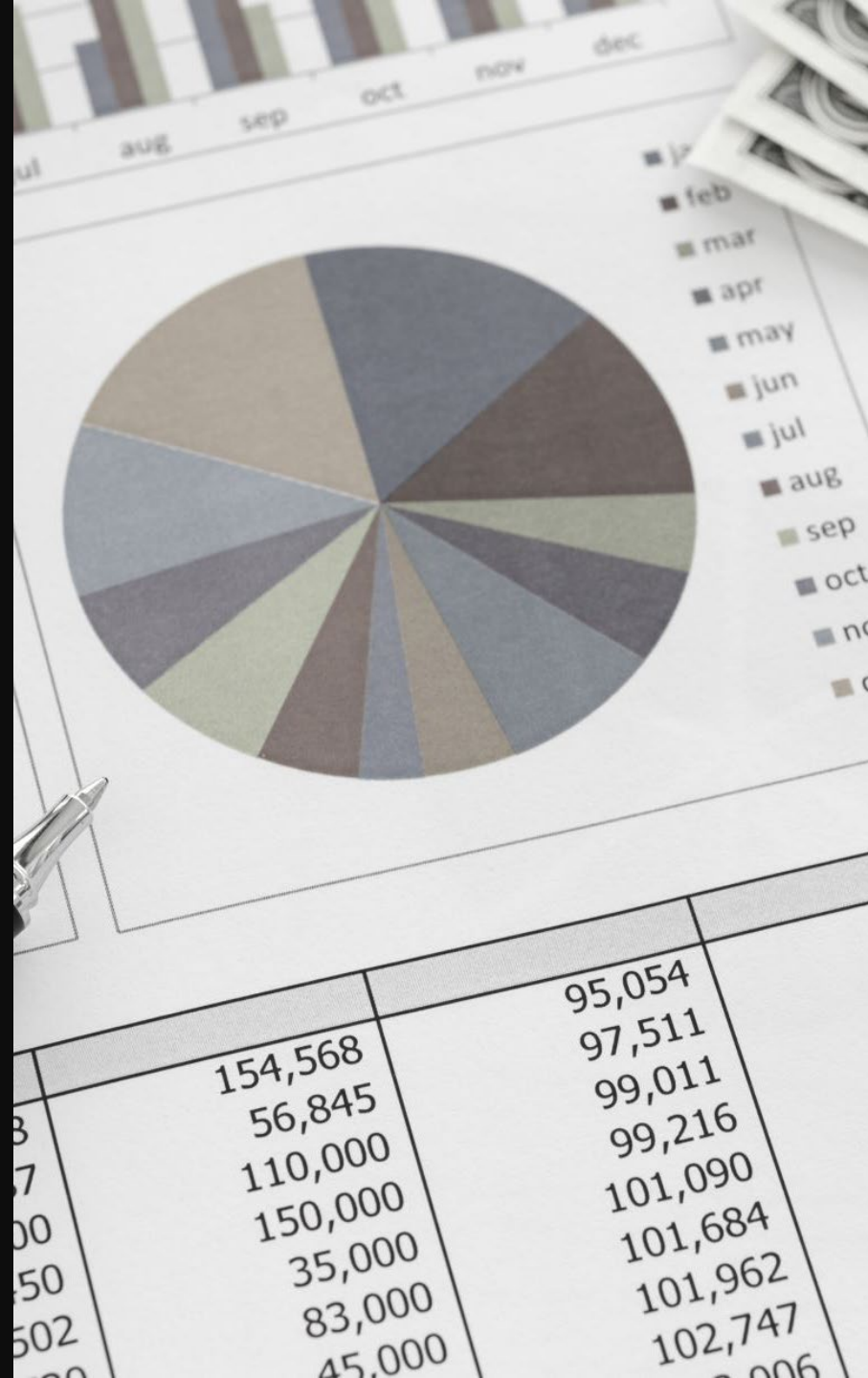
Conclusions can be disputed. Facts cannot.

- Cross-examining in the chapter method shows that you do not need to hit the witness over the head with a baseball bat until he agrees with that conclusory question.
 - Instead, the idea is to reveal various aspects of the witness's dire financial situation one fact at a time.
 - What follows are some chapters you might employ in order to weave this tapestry:
-



Conclusions can be disputed. Facts cannot.

- Chapter 1: In 2013, you took a loan of \$10 million from Wells Fargo Bank.
 - Chapter 2: The repayments on the \$10 million loan were outlined as follows.
 - Chapter 3: The funds were obtained to support your purchase of ABC Company.
 - Chapter 4: The strategy was to utilize funds obtained from your widgets contract to fulfill the loan installment.
-



Conclusions can be disputed. Facts cannot.

- Chapter 5: The value of the widgets contract.
 - Chapter 6: The payments expected from the widgets contract.
 - Chapter 7: But in 2015, the widgets contract was canceled.
 - Chapter 8: In April 2015, you missed your quarterly payment to the bank.
-



Conclusions
can be
disputed.
Facts
cannot.

- As demonstrated in these chapters, a contested fact can be most effectively established by constructing sets of facts that lead to an inescapable conclusion.
- The hostile witness is left to answer “yes” all the while itching to elaborate on the reasons why.
- This is why it is vital to stick to proving the facts and resisting the temptation of trying to get the witness to agree with your desired conclusion – that is, that he was under intense financial pressure.

Conclusions can be disputed. Facts cannot.

- You need to completely reverse your perspective. You have to give more credit to the jury and trust that they will arrive at the desired conclusion if you stick to the systematic grouping of facts and allow them to make the discovery on their own.
- No question, the witness will “deny, deny, deny” on re-direct. But blanket denials are self-serving and pale in comparison to vivid and detailed facts. They can’t paint nearly as powerful a picture as what a chapter can.

Conclusions can be disputed. Facts cannot.

- Query: What if you know that a hostile witness will affirm a conclusory question? Must you still create the factual context necessary to make the point?
- Even if a hostile witness can be counted on to affirm a conclusory question, that one-word answer, standing alone, is insufficient.



Conclusions can be disputed. Facts cannot.



- In keeping with the theme that you are “educating the jury” during cross, you should still provide the jury with distinct facts that help them to accept your goal. Focusing on one topic allows you to emphasize the point you are making with unmatched clarity.
- Stay motivated. Don’t take short cuts.

A person wearing a dark, hooded raincoat is walking away from the camera down a wet, reflective street at night. The street is illuminated by several streetlights, creating a moody and atmospheric scene. The person's reflection is visible on the wet pavement. In the top left corner, there is a small red rectangular graphic element.

Practice

For practice, how would you describe this image without using conclusory terms like “dark,” “secluded,” “ominous,” or “foreboding?” Don’t forget the formula: $A + B + C = D$ where A, B, and C are your available rock-solid, unshakeable facts and D is the factual goal that you will allow the jury to infer on their own.

One Question is Never Enough



A group of facts create context. A solitary leading question doesn't.



Receiving a favorable answer to a goal fact question is never enough!



The goal must be supported with the strongest facts that are available.



The facts that support the goal provide the strongest justification for the jurors to accept the inference suggested by the chapter.

One Question is Never Enough

- As the attorney, it is your job to provide enough detail and supporting facts that decisions seem obvious or at least fully substantiated by the facts.





Establishing the goal fact through supporting facts

- The straightforward goal of establishing that a witness saw a white Honda requires more than simply asking, “You saw the white Honda?”

Establishing the goal fact through supporting facts

- Example
 - Q: You were standing on the street corner?
 - Q: It was daylight?
 - Q: You saw a Honda?
 - Q: It caught your attention?
 - Q: It was white?

Establishing the goal fact through supporting facts

- This group of questions requires the witness to admit all four facts in order to firmly establish the goal fact that the witness saw a white Honda.
- These supporting facts, while seemingly innocuous, more precisely and convincingly confirm the fact that the witness saw the Honda and that it was white.

Drafting Chapters: Putting Facts Into Context

- We've talked a lot about the "goal."
- What do I mean by goal? To me, the goal is to create within the jury a "feeling" about a fact.
- A goal is made up of numerous supporting facts.

Drafting Chapters: Putting Facts Into Context

- For example, in a chapter called, “Promises Made by the Government,” the literal fact is that the snitch got a deal in exchange for immunized testimony.
- Odds are that the snitch will concede that and may well have done so on direct.
- The more important goal, however, is to get the jury to view the snitch as a “fish rotting from its head down” so that they will not believe his testimony.

Drafting Chapters: Putting Facts Into Context

- What is the goal of the chapter? It's two-fold
 - First, to put the deal into context
 - Second, to flesh out for the jury why the heck it matters

Drafting Chapters: Putting Facts Into Context

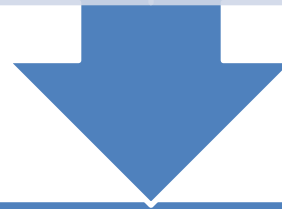
- Example: John is arrested for theft, but no money is found on him. This is a fact. It could be the most critical fact of the case or it could be completely innocuous, depending on the context.

Drafting Chapters: Putting Facts Into Context

Here's what I mean:

Was John approached moments *after* the bank robbery because he fit the description given by the teller?

Was John arrested four weeks *later* after a photo identification?



Only by knowing the context of the fact can you – and ultimately the jury – appreciate its significance to the case.

Drafting Chapters: Putting Facts Into Context

- In order for a goal fact to have meaning to the jury, you must examine it upside down, sideways, and backwards in various contexts.
- The chapter method is the most straightforward way of finding the appropriate context for a factual goal.



Drafting Chapters: Putting Facts Into Context

- In the chapter, “Promises Made by the Government,” the goal-fact may be the deal.
- But what about the *context*?
- Perhaps the defense attorney wants to exploit the deal as being so generous that it defies belief. In this case, the theme might be, “too good to be true!”

Drafting Chapters: Putting Facts Into Context

- Example: John was caught red-handed – in one hand his gun, his trusty friend. In the other hand, a bag of money – someone else's money. John was facing a prison sentence that would have kept him behind bars for the rest of his life – a life spent away from his family and confined to a cold, dank cell with a porcelain toilet and a mattress so thin that the springs left permanent bruises up and down his spine.

Drafting Chapters: Putting Facts Into Context

- John no longer needs to fear a life condemned to living behind bars because prosecutors promised “to take care of it for him.”
- These ancillary facts provide a context in which the goal-fact can be appreciated.

Drafting Chapters: Putting Facts Into Context

- Some chapters have a second purpose: “Establishing a feeling or an emotional reaction to the facts.”
- Generating a particular *emotion*, such as sadness, outrage, empathy, disgust can be very powerful. Here, specificity is crucial.

Drafting Chapters: Putting Facts Into Context

- For example, the chapter, “Promises made by the government” is as much designed to leave a bad taste in the mouths of the jury with respect to the “back room” deal negotiated between the prosecutor and the drug dealing witness as it is to deliver factual information about the chapter.

Drafting Chapters: Putting Facts Into Context

- There are times when the emotional goal will outweigh the factual goal.
 - For example, when you can elicit from the snitch how he lied, cheated, and deceived people, proving *how* he accomplished his crime is subordinate to convincing the jury that he is a diabolical rat capable of manipulating facts and manufacturing lies, not unlike Heath Ledger's character, The Joker, in "The Dark Knight."
-



Drafting Chapters: Putting Facts Into Context

- The emotional reaction rarely subsides, but will continue to last long after the witness is done testifying. The jury's memory of him will not soon fade!

Building a Chapter: Step 4: When is a subject sufficiently broken down?

- In “Cross-Examination: Science and Techniques,” Pozner and Dodd answer this question in the form of a “mathematical equation.”
 - They reduce it to a four-step formula:
-

The image shows a chalkboard with handwritten mathematical work. At the top left, a graph of a curve is sketched with a secant line drawn through two points on it. The text "Secant Lines" is written next to the line. To the right, the derivative is defined as a limit: $f'(x) = \lim_{h \rightarrow 0} \frac{f(x+h) - f(x)}{h}$. Below this, the specific function $g(x) = x^2 + 2x$ is used. The derivation proceeds through several steps: $f(x) = \lim_{h \rightarrow 0} \frac{x^2 + 2x + (x+h)^2 + 2(x+h) - (x^2 + 2x)}{h}$, which simplifies to $\lim_{h \rightarrow 0} \frac{2xh + h^2 + 2h}{h}$, and finally to $\lim_{h \rightarrow 0} h(2x + h)$. Other visible text includes "y=g(x)", "x+h", and "g(x+h)-g(x)".

$$y = g(x)$$

Secant Lines

$$f'(x) = \lim_{h \rightarrow 0} \frac{f(x+h) - f(x)}{h}$$
$$f(x) = \lim_{h \rightarrow 0} \frac{x^2 + 2x + (x+h)^2 + 2(x+h) - (x^2 + 2x)}{h}$$
$$= \lim_{h \rightarrow 0} \frac{x^2 + 2x + x^2 + 2xh + h^2 + 2x + 2h - x^2 - 2x}{h}$$
$$= \lim_{h \rightarrow 0} \frac{2xh + h^2 + 2h}{h}$$
$$= \lim_{h \rightarrow 0} h(2x + h)$$

x+h

$$g(x+h) - g(x)$$
$$= \lim_{h \rightarrow 0} h(2x + h)$$

Building a Chapter: Step 4: When is a subject sufficiently broken down?

- Step 1: “Every topic has a value.”
- Step 2: “That value can range from virtually zero to supremely important.”
- Step 3: “To recognize the value of a particular topic, consider how much that topic helps [your] theory of the case or how much that topic undermines [your adversary’s] theory of the case.”

Building a Chapter: Step 4: When is a subject sufficiently broken down?

- Step 4: “A topic having the greatest impact on the opposing theories of the case deserves the greatest time and attention.”

Building a Chapter: Step 4: When is a subject sufficiently broken down?

- Here is an example.
- Recall the earlier example where the cross-examiner had to establish that the witness was in dire financial straits in a specific year.

Building a Chapter: Step 4: When is a subject sufficiently broken down?

- To the extent that financial apocalypse significantly undermines a competing theory of the case, then all of the information that is available to paint such a dire picture must be summoned together and given its own chapter.
- This is where you say, “time out” and break this chapter down into fine granules of sand and meticulously examine each one like a scientist would a particle under an electron microscope.

Building a Chapter: Step 4: When is a subject sufficiently broken down?

- This hyper-attention to detail might lead to the following additional chapters:
 - A bank loan requiring periodic payments
 - A missed payment in that time frame
 - The forced sale of the witness's assets at a sheriff's sale
 - NOTE: If a bank loan entered into years before had no bearing on the financial plight of the witness, then leave it out.
-



Building a Chapter: Step 4: When is a subject sufficiently broken down?

- If additional events exist to help prove the financial plight of the witness, then additional chapters should be developed using those facts.

Important Topics Should be Broken Down in Great Detail

- The most important topics should be broken down in the greatest detail.
 - Tip: It is far easier to combine two chapters into one larger chapter in the eleventh hour than it is to attempt to break down one chapter into multiple smaller chapters when resting in a hammock on a lazy Sunday afternoon.
-



Important Topics Should be Broken Down in Great Detail

- The example involving the photographic array demonstrates that even general chapters that may at first appear to be damaging to your theory of the case can be neutralized or, even better, turned into “good facts” that support the theory of your case. But this can only happen when details are closely analyzed.
-



Important Topics Should be Broken Down in Great Detail

- When in doubt, analyze the material more closely. Events are only understood in context. Give yourself permission to daydream and let your imagination run wild. You will be surprised what you unearth. This is the genesis of all creativity. But you must be relaxed and calm in order for your fertile imagination and free association to take over.
-



Is it
possible to
break the
evidence
down too
far?

- Yes. This is a pitfall that must be avoided since time spent preparing for irrelevant issues is time wasted. As busy lawyers, we can't afford to get sucked into the cosmic vacuum of a black hole and be left to languish there.
- What deserves the greatest attention is the evidence that has the greatest impact on the theory of the case or on the credibility of a witness.

Is it possible to break the evidence down too far?

- Topics or chapters that accomplish none of these things are not worthy of your time and should be disregarded entirely.
-



Is it possible to break the evidence down too far?

- Example:
 - If the date has nothing to do with the contrasting theories of the case, don't waste time drafting a chapter concerning the date.
 - If the educational background of the witness has no bearing on the case or on the credibility of the witness, don't waste time drafting a chapter on it.



Is it
possible to
break the
evidence
down too
far?

- One of the advantages of the chapter method is that important facts deserving of attention will begin to pop right out and grab your attention like a flashing neon sign.



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