

SUGGESTED QUESTIONS TO QUALIFY JACQUELINE JOSEPH AS A TESTIFYING EXPERT

A. General Qualifying Questions:

1. Please state your name and address.
2. What is your profession?
3. How long have you been examining handwriting and documents?
4. What does a forensic document examiner do?
5. What year did you begin examining handwriting and documents?
6. Do you maintain an office and a laboratory?
7. Is it your full-time occupation?
8. Where are your office and lab located?
9. Do you have a current CV you can submit to this court?
10. What is the extent of your formal education?
11. What training have you received specific to forensic document examination?
12. What equipment do you have in connection with your work?
13. Do you belong to any professional organizations of forensic scientists and document examiners?
14. Have you written any peer-reviewed articles that have been published in the field of forensic document examination?
15. Have you ever been invited to speak, lecture or teach forensic document examination?
16. Have you conducted research in the field of forensic document examination?
17. Have you participated in proficiency testing?
18. Who are you certified by?
19. Are you re-certified?
20. How many times have you testified in court as an expert in the field of document examination?

21. Have you ever failed to qualify as an expert in any court?
22. Have you ever told a lie?

B. Supplemental Qualifying Questions:

23. How do you keep current with the latest developments in your field?
24. What previous and current positions have you held in professional organizations?
25. What research in your professional field have you conducted?
26. What proficiency tests have you completed and when?
27. What organizations have re-certified you?
28. Which generally accepted authors in your field have you read?
29. What percent of the time do you work for the defendant/plaintiff?

C. General Testimony Questions:

30. What are the basic principles of handwriting identification?
31. Would you say that the circumstances surrounding the execution of the questioned document(s) is/are important?
32. Would you say that the physical and mental condition of the writer at the time of the writing is important?
33. What are the factors (physical, mechanical, psychological) that affect handwriting identification?
34. What is a standard or exemplar?
35. How many exemplars do you need to make an identification?
36. How many types of exemplars are there?
37. What are the advantages and disadvantages of each type?
38. What are some of the characteristics of handwriting you compare?
39. What problems arise with photocopies vs. original documents?

40. Why do document examiners disagree?
41. How many kinds of forgery are there? Please explain them.

D. Case Specific Questions:

42. When were you first contacted in this case? By whom?
43. What were you asked to do with the documents?
44. Did you, yourself, perform this examination?
45. What equipment did you use in your examination?
46. Explain to the court (jury) how you conducted your examination.
47. Did you reach a conclusion?
48. Did you examine the original documents or photocopies?
49. Did you request to see the original documents?
50. Did you have a sufficient number of known, comparable signatures?
51. Did you prepare any exhibits for this case?
52. Please explain to the court (jury) what the exhibits are and demonstrate your findings.
53. As a result of your examination and comparison, what is your professional opinion?
54. Why did you qualify your opinion?

E. Supplemental Case Specific Questions:

55. Was it necessary or possible to use infrared lighting?
56. Was it necessary or possible to use ultraviolet light?
57. Was it necessary or possible to analyze the inks used?
58. Was it necessary or possible to analyze the paper used?
59. Was it necessary or possible to use an indentation materializer?
60. Was it necessary or possible to use a PhotoShop-type software?

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