

CHEAT SHEET(s)

I. SOCIAL MEDIA POSTS

(if the information gathered is from the creator of the page)

- a. Do you have a Facebook page?**
- b. Is it currently active?**
- c. Who has access to this page?**
- d. Does anyone have authorization to update or edit this page other than you?**
- e. How is the page protected?**
- f. (Hand copy of social media page to witness) do you recognize what I've just handed you?**
- g. What is it?**
- h. Does it appear to be a fair and accurate representation of your page?**
- i. Does it appear to be altered in any manner?**
- j. Your Honor, at this time I would like to enter this document into evidence as exhibit_____.**

(if the information was obtained through a third-party)

- a. Are you familiar with the Petitioner/Defendant?**
- b. How do know them?**
- c. Are you friends with them on any social media networks?
Which ones?**
- d. Are you familiar with his/her Facebook page?**
- e. Is it currently active?**

d. Would you recognize it if it were presented to you today in court?

e. (Hand copy of social media to witness) do you recognize when it just handed you?

f. What is it?

g. Does it appear to be a fair and accurate representation of ____'s page?

h. Does it appear to be altered in any manner?

i. Your Honor, at this time I would like to enter this document into evidence as exhibit_____.

(text messages)

a. Are you familiar with the Petitioner/Defendant?

b. Do you communicate with him/her on a regular basis?

c. In what ways do you communicate with him/her?

d. Did you receive a text message from the Petitioner/Defendant recently/or on this date?

e. Would you recognize the message if it were presented to you today in court?

f. (Hand copy of text message to witness) do you recognize what I just handed you?

g. What is it?

h. How'd you know that this is a message from the Petitioner/Defendant?

i. Does it appear to be a fair and accurate representation of the text message you received on (specific date)?

j. Does it appear to have been altered in any way?

k. Your Honor, at this time I would like to enter this document into evidence as exhibit_____.

2. Photos/videos

(photos)

- a. Did you see (the subject of the photo)?**
- b. (Hand the witness the photograph) is that this photo a true and accurate representation of what you saw?(Note that the witness does not have to have been the photographer)**
- c. Your Honor, at this time I would like to enter this document into evidence as exhibit_____.**

(videos)

- a. Did you see (the subject of the video)?**
- b. Was the activity in this video a true and accurate representation of what you saw during the taking of the video?**
- c. Is the sound a true and accurate representation of the sound that you heard during the taking of the movie or video?**
- d. Your Honor, at this time I would like to enter this document into evidence as exhibit_____.**

3. Impeachment

(after asking the witness the same question that was asked in the deposition and getting a different answer.)

- a. You have given a deposition in this case, correct?**
- b. You appeared in my office on _____ for a deposition?**
- c. You arrived at my office with your attorney?**
- d. Your attorney sat by your side throughout the testimony?**
- c. You saw a court reporter in the room?**
- d. The court reporter took down every word that was stated?**
- e. The court reporter administered an oath to you, true?**
- f. You raised your right hand swore to tell the truth?**

g. Did you tell the truth?

h. I draw your attention to page __ of the transcript of your deposition, beginning at line __, where I asked you the following question and you gave the following answer.