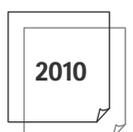


L4

**Handwriting Analysis: Effective Use of a Documents
Examination Expert**

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Handwriting Analysis: Effective use of a Documents Examination Expert, 2010

L4 Session
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This course will include planning for the use of an expert, factors in selecting an expert, understanding basic explanations of analysis techniques in use, handling the expert relationship, and preparing the expert for trial.

OUTLINE OF PRESENTATION:

1. Introduction
2. Planning is Key
3. Factors in Selecting the Expert Witness
4. Understanding Basic Analysis Techniques
5. Some General Rules of Good Practices
6. *Daubert* Issues
7. The Attorney - Expert Relationship
8. A Sample Adverse handwriting Expert Witness Deposition & Testimony Outline

1. INTRODUCTION

Published books dealing with handwriting analysis go back, literally, to the 16th Century, but the first known case allowing a questioned document examiner's testimony was in 1792, *Goodtitle Drevett v Braham*, 100 Eng. Rep. 1139. The current leading case is considered by many to be *United States v Prime*, 431 F.3d 1147 (C.A. 9, 2005), upholding handwriting expert testimony under *Daubert* standards.

Questioned document examination is a field that goes by many names, including handwriting analysis, document examination, forensic document examination, and handwriting examination, among others. It can involve analyzing a document itself, i.e., the paper, ink, etc, as well as the writing on the document, i.e., questioning the authorship of handwriting. In some jurisdictions, courts note the difference between a document examiner and a handwriting expert because the two involve different subjects.

The commonly accepted name for such an expert is a forensic document examiner. That is the phrase you should use.

A document examiner, as the name implies, is trained to examine documents themselves while a handwriting expert is trained to examine the handwriting itself. Still, most experts in this field will examine a whole document, even if the only questions raised deal with handwriting on the document.

What training and education is common to the document examination field? The industry standard is established by ASTM (American Society for Testing and Materials) Standard E2388-05, "Standard Guide for Minimum Training Requirements for Forensic Document Examiners," and includes only a bachelor's degree and, literally, "excellent eyesight." The ASTM standard goes on to recommend two years of full time training under the supervision of an experienced document examiner. There is no known in-classroom formal degreed education available in the United States, although correspondence and internet classes do exist. Courses on forensic document examination are known to be offered currently by George Washington University, Oklahoma State University, and Marshall University.

What circumstances call for the use of a document examiner? Any case where handwriting or signatures are in dispute, where document alterations are at stake, where the accuracy of mechanical copying processes are disputed - in short, any time two sides disagree on the genuineness of part or all of a document.

What standards are used by a document examiner? There are at least four that you should be familiar with if your case involves a challenged document, starting with ASTM E2388-05 noted above.

The "gold standard" of a forensic document examiner's work is defined by ASTM Standard E444-09, dealing with forensic document examiners, and titled "Guide for Descriptions of Scopes of Work Relating to Forensic Sciences for Questioned Document Area."

The standard for non-destructive examinations of paper is found at ASTM E2325 and is titled "Standard Guide for Non-destructive Examination of Paper."

The standard for comparing inks is found at ASTM E1422, titled "guide for Test Methods for Forensic Writing Ink Comparison."

More terms commonly used in the field are defined in ASTM E1732, "Terminology Relating to Forensic Science."

What professional associations exist for document examiners? The most well known organizations are the American Academy of Forensic Sciences and the International Association for Identification, which have sections devoted to questioned document examiners, along with a similar organization in Canada, England, Australia, and a European organization. Private membership and trade groups include the National Association of Document Examiners, Association of Forensic Document Examiners, and the Southwestern Association of Forensic Document Examiners and Southeastern Association of Forensic Document Examiners.

Is there a certification program? Yes. Since there is no industry standard licensing authority, certification is the only “credentialing” method for document examiners. The American Board of Forensic Document Examiners, Inc. has been recognized as reputable in at least one court case. Another certification granting entity is the Board of Forensic Document Examiners.

2. PLANNING IS KEY

Practice Tip 1: Show Respect. Don’t call your expert a “handwriting expert.”

In the courtroom, in the judge’s chambers, and in the presence of your client, never call them a ‘handwriting expert’ because of the negative, less-than-an-expert connotation it carries.

You aren’t using an expert to conduct personality testing or to look into the psychological aspects of a person’s ego as revealed by their handwriting style. That’s called “graphology” and sometimes “Gestalt graphology” and there are only 3 academic institutions in the world offering any degree in such topics: Argentina, Spain, and Italy. That fact alone should tell you something.

Your expert is a “forensic document examiner” or “questioned document examiner.” Courts generally refer to the field as “questioned document examination” and it typically addresses the sole question of whether or not a particular person wrote a particular document or, to put it more broadly, if a document is genuine.

Practice Tip 2: Master the Subject Matter Area of the Expert Without Becoming an Expert.

If you want to use a handwriting expert, then you need to know the fundamentals of what they do and how they do it. No matter what kind of document is at issue, you need to know the accepted and disputed techniques of

analysis and protocol in the industry. You don't want to become an expert, but you need to be able to recognize when an expert is being less than completely honest with you.

If you are unsure, then spend the time necessary with your expert to learn what they do, why they do it, and how they do it. If you have taken the time and trouble and expense to hire a document expert, then you can expect your opponent will do likewise and you will need to have a basic understanding of their techniques in order to prepare an adequate cross examination of your opposing expert.

There are plenty of general articles and tips on the internet to give you a good start, but nothing substitutes for the knowledge you can gain first hand from your own expert.

Practice Tip 3: Introduce the topic in Voir Dire.

The first mention of a forensic document examiner should occur in voir dire and should be followed with more discussion in your opening statement.

The Voir dire mention is important because some lay people still do not accept a handwriting expert as a "real" expert. That may well be because of the lack of any well-known industry organization and standards of practice in the industry itself. Voir dire is your chance to get the jury talking so you can identify the attitudes of prospective jurors toward the topic. Generally, you want people who either have accepted the field or are open to learning about it in order to accept that it is a specialty area where expert testimony can guide them.

Be careful not to tread into the area of the graphologist, which, for many people, is akin to palm-reading and tea leaves. It may be entertaining "parlor room talk" but it not the stuff of a courtroom case. Stay far away from it.

It may be useful to explain the scientific training and education that can go into the background of a qualified forensic document analyst at an early stage in the trial. Whether that is done in voir dire or your opening statement will depend on the facts of your case, the personalities of the attorneys and judge in the case, and the spontaneity of the voir dire itself.

Practice Tip 4: Pound Your Point in Opening Statement.

There will come a time when the questioned document is mentioned in your opening statement, along with the importance of questioning the handwriting at issue. That is your cue to bring up your expert by name, along with

his or her background and credentials, which can be used to explain to the jury why they will find your expert credible and will accept the expert's testimony.

Some attorneys use the "quarter, half, full" approach to introducing their expert to the jury. In voir dire, the top quarter of the expert's credentials are mentioned to the jury. In opening statement, the top half are discussed. In direct examination of the expert, the full set of the expert's credentials are explained in detail by the expert himself or herself. This approach carries with it the power of persuasion through repetition.

Other attorneys prefer to put the credentials all up front, either in voir dire or in opening statement or perhaps both, in order to establish their expert as the benchmark of the truth on the questioned point, before their opposing counsel has the chance to do the same with their own expert.

Which way you will do it will depend more on your trial style and the substance of the credentials for each side's expert.

3. FACTORS IN SELECTING THE EXPERT WITNESS

Practice Tip 1: Credentials, credentials, credentials.

Anyone can claim to be a forensic document examiner because there is no licensing authority. What matters with a document examiner expert is the same thing that matters with the use of any expert. They must have the education, training, and experience for the foundation of an expert witness in this area. Then they must have the courtroom experience to know how to handle themselves in a trial. Then they must have great communication skills in order to persuasively explain the validity of their conclusions.

An ideal expert is not always available or affordable. Still, there are minimal credentials to consider before selecting an expert for your case.

- at least 5 years full time experience (the more the better)
- a full set of appropriate forensic equipment or access to the more expensive equipment
- at least ten instances of trial testimony, covering both federal and state courts
- at least 15 instances of depositions
- at least 20 instances of drafting an expert report
- certification from the American Board for Document Examiners or the Board for Document Examiners

- current membership in the American Academy of Forensic Sciences and at least one of the following organizations:

- National Association of Document Examiners
- Association of Forensic Document Examiners
- Southwest Association of Forensic Document Examiners
- Southeast Association of Forensic Document Examiners

Practice Tip 2: Avoid Apparent Bias

Think carefully before hiring an expert document examiner who has spent all his time testifying just for the side of the case that you are on, i.e., plaintiffs or defendants. The problems of such are obvious. And make sure you share all information with your expert that the expert could possibly need to know to do their job. And when you think you've done just that, then ask the expert if they need anything more. Most handwriting experts want lots of exemplars to work with, original documents that were written in the time frame of the disputed document and often just before and just after that time frame. Make sure you gather such documents as soon as your expert identifies their needs.

Practice Tip 3: Check Out Your Own Expert

Opposing counsel will ultimately check out your expert carefully so you should do that in advance yourself. Critical will be the question about whether or not your intended handwriting expert has ever failed to qualify as an expert in a court case. Determine what weak points exist in their background. And when the opinions come in from your expert, take them for what they are. Do not try to stretch your expert to provide an opinion that they are not comfortable with giving in the first place.

Practice Tip 4: Hire Early

Don't wait until the last minute to hire a questioned document examiner. What you do as an attorney takes time and patience and skill. What an expert document examiner does also takes time and patience and skill. Don't rush your expert by failing to hire an expert promptly. Getting an expert in the case early can provide you with valuable information for your depositions in discovery.

Practice Tip 5: Know What You Want

Make sure you know exactly what factual issues and legal issues you and your expert will be dealing with, long before your expert has to grapple with them in a deposition or you have to respond to them in a motion to exclude.

Practice Tip 6: You Get What You Pay For

Bear in mind, of course, that the more detailed the resume of education, training and experience, the more costly the expert will likely be to engage. That may be especially true of the expert with high-profile experience but there is an extraordinary value to the expert who can say he did consulting work for a well known organization or law enforcement agencies.

4. UNDERSTANDING BASIC ANALYSIS TECHNIQUES

The primary way a document examiner determines authorship of a disputed document is with comparison to known undisputed samples of handwriting from the same person.

Practice Tip 1: The Stages of an Expert's Analysis

Typically, the process comes in 3 or 4 stages. Analysis, comparison, evaluation, and sometimes peer review.

1. The Analysis Stage. Here, the examiner analyzes both the questioned writing and the known writing and breaks them down into directly perceptible characteristics. Several known writings may be broken down in order to establish a known standard for a particular characteristic of a writing.

2. The Comparison Stage. Next the characteristics of the two writings are directly compared, often letter for letter or just part of a letter.

3. The Evaluation Stage. Often this is the final step and it involves evaluation of similarities and differences in the compared writings in order to determine what contributes to the examiner's conclusion. Because the final opinion can be subjective, it is this stage that is frequently challenged on the witness stand.

4. The Peer Review Stage. Not always used, this stage involves having a second examiner, a peer, verify the first examiner's conclusion.

Practice Tip 2: What Equipment Is Used by a Document Examiner?

A magnifying glass, often called a "handlens," is standard equipment but is often supplemented with a stereomicroscope, which is simply a microscope that you look through with both eyes. It can be powered with external light or use normal visible light, and often will have a camera attached to capture minute

observations in handwriting.

Another tool used by some examiners is called an Electrostatic Detection Apparatus. This tool is used to examine the impressions made on paper when a person presses pen to paper and can also involve the capillary flow of ink on the paper itself.

One of the most modern pieces of equipment, and most expensive, is the Video Spectral Comparator found in sophisticated government crime labs like the FBI. It reads light frequencies that are reflected by inks and papers to determine subtle differences that can occur by some types of alteration and forgeries.

5. SOME GENERAL RULES OF GOOD PRACTICES

Practice Tip 1: Know Thy Expert (And Know the Other Side's Too)

Information Gathering in Advance

- Cv Analysis
- Internet Research for Background and Expert Database Info (Westlaw, etc.)
- Professional Association Verification
- Testimony in Other Cases
- Report Analysis
- Your Expert's Analysis of Their Expert's Report and Background

Methods of Defusing an Attack and of Attacking an Expert

- Search for the Achilles Heel of Your Own Expert and of Your Opponent's Expert
- Qualifications
- Basis of Opinions
- Opinions
- Hypothetical Questions
- Getting Adverse Expert to Agree with Your Expert
- Explore Sources of Possible Bias (Prior Testimony, Ongoing Relationship, etc)
- Find Prior Testimony Rejected by Prior Juries

Get as much information about the adverse expert witness in advance as you can. Use formal discovery and then your own research. Westlaw and other online expert witness database sources can help you understand an expert's background. Here is where a simple internet search can yield valuable fodder to discredit or impeach an adverse expert witness.

Check their professional association relationships to verify current membership and status. Look up published articles to see if the expert is claiming authorship for what are really co-authored articles. Check out educational backgrounds to see if their college still exists or if they really attended or if their private college or business school was closed down. Go over the adverse expert's report and their background with your own expert to gather useful tips that can expose weakness or inconsistencies.

The common areas of attacking an expert are known and, thus, expected by your opponent and the adverse expert. Still, you should look for chinks in the armor. It can be surprising to see how many experts claim more experience than their credit is due.

Still, when the adverse expert is difficult to impeach, then instead use their expert to buttress your own expert's credentials or experience or testing methodology. That way you can be in a position to later argue "even their own expert agrees with us."

A particularly effective cross examination can include evidence that a prior jury in another case rejected the expert's opinions. That is especially true if the adverse expert testified against a government expert or other person of established greater authority.

6. *DAUBERT* ISSUES

Practice Tip 1: Prepare for a *Daubert* Challenge

The US Supreme Court established five basic criteria that expert testimony must meet to be admissible as evidence in *Daubert v. Merrell Dow Pharms., Inc.*, 509 U.S. 579 (1993). Essentially it is that such evidence must:

- A. be verifiable, refutable, and testable
- B. be valid and reliable
- C. subject to published peer review
- D. held to standards within the field
- E. be generally accepted in the scientific community

The problem with handwriting analysis is that it can fail to meet that criteria, depending on the system of handwriting analysis used by the particular expert at hand.

Practice Tip 2: Know *Prime*

A leading case on handwriting experts and the *Daubert* requirements is *United States v Prime*, 431 F.3d 1147 (9th Cir. 2005). In that case the Court explained how an expert in this field could pass the *Daubert* factors. This case is “must” reading for counsel who want to argue for the use of a handwriting expert in their case.

The case involved a scheme to commit fraud by sales of pirated software and non-existent merchandise along with counterfeit money orders and theft of credit card numbers from their own customers. At trial the prosecution presented a forensic document examiner from the Secret Service, who testified that 38 damning exhibits were authored by defendant Prime.

At the end of a *Daubert* hearing, the Court denied the defendant’s motion to exclude the expert’s opinions, holding that the testimony was reliable. See *US V Prime*, 220 F.Supp.2d 1203 (W.D. Wash. 2002).

The Ninth Circuit ultimately affirmed the admission of the expert’s testimony under the *Daubert* standards, finding the Ninth Circuit to join with similar decisions in six other circuits. See *United States v. Crisp*, 324 F.3d 261, 269–70 (4th Cir. 2003); *United States v. Mooney*, 315 F.3d 54, 63 (1st Cir. 2002); *United States v. Jolivet*, 224 F.3d 902, 906 (8th Cir. 2000); *United States v. Paul*, 175 F.3d 906, 911 (11th Cir. 1999); *United States v. Jones*, 107 F.3d 1147, 1161 (6th Cir. 1997); *United States v. Velasquez*, 64 F.3d 844, 850–52 (3d Cir. 1995).

The *Prime* case is a road map on how and why handwriting testimony may be admissible at trial.

7. THE ATTORNEY - EXPERT RELATIONSHIP

An expert witness can be immensely helpful to a retaining attorney and his client in understanding the more complex aspects of a questioned document or questioned handwriting. The expert’s analysis can contribute to a better understanding of the true state of the facts in a dispute.

Practice Tip 1: The Expert’s Job

An expert should be impartial and independent and not have any close personal or business ties with any party or attorney in a case or any personal or business interest in the outcome of a case. The expert owes his duty to finding the truth about a matter and not to the party or attorney that hired him. The expert should not be an advocate for the party that hired him; the expert should be an advocate only for the truth that his opinions lead him to. For the expert to tell the

retaining attorney the “bad” part of a case is just as important as explaining the “good” part.

Practice Tip 2: The Employment Agreement

The expert’s employment agreement does not have to be in writing but, absent a good working relationship, it should be normal practice for the attorney to memorialize the relationship in a written letter or memo of understanding. The attorney should make sure that the expert keeps careful track of all the time spent on the task, since that shows the thoroughness of the work performed and will be needed for billing purposes anyway. It would, of course, be wise for the retaining attorney to obtain the expert’s hourly rate in advance and, if possible, an estimate of the total project cost for each stage of the expert’s work, i.e., evaluation, report, deposition, trial, etc.

Practice Tip 3: Avoiding Conflicts of Interest

To guard against any misunderstanding or confusion, after the expert is retained by the attorney, the expert’s identity should be timely disclosed to the other party or their attorney. The attorney should also request that the expert immediately advise the attorney of any contact that occurs with the opposing side of the case outside of the presence of the retaining attorney. The retaining attorney may want to alert the expert that great caution should still be exercised even when the contact with the opposing counsel is on a different case. A written account of all contacts with the opposing side of the case should be kept as it occurs, giving the substance of the matters discussed. This account should be sent to the party/attorney who retained the expert as soon as possible.

Practice Tip 4: Preparation for the Questioned Document Inspection

Early in the process, the expert should be asked what original and copies of documents or writings will be needed by the expert for the questioned document inspection, both in type and quantity and any necessary date range the expert may desire for exemplar documents. A time line of the expert’s anticipated work may be desirable so that the retaining attorney, and their client, may know what to expect. The expert should also be advised of the disputed issues so they may better understand the precise task at hand.

Practice Tip 5: The Fundamentals of a Handwriting Expert’s Report

The purpose of an expert witness report is to succinctly convey, at a minimum, the expert’s analysis, methodology, findings, and opinions. In many cases it will be reviewed by attorneys involved in a lawsuit. The expert may be

questioned about the contents of the Report in great detail later, so considerable caution must be paid to the accuracy and details in the Report itself. Even spelling errors can be used to discredit a competent expert.

The expert Report should give a well reasoned opinion and answer to any questions asked and should generally not merely state a simple “yes or no” opinion on anything. The expert need not, and should not, be verbose but too short an explanation can be a ground upon which a cross-examiner may later successfully discredit the validity of an expert’s opinion. A careful balance should be struck between the “long” and the “short” of it.

Practice Tip 6: Fundamental Areas of an Expert Report

Although there are several fundamental areas for the expert to cover in the normal handwriting expert’s report, each expert can be expected to have their own report format and style. It is wise for the retaining attorney to review the areas desired to be covered by the report in advance, of course. Typical areas to be covered include: introductory identification of who is preparing the Report and who it is prepared for; the documents examined; the inspection and testing process explained; the expert’s opinions and conclusions. Often included will be relevant photographs and the expert’s resume.

8. A SAMPLE ADVERSE HANDWRITING EXPERT WITNESS DEPOSITION & TESTIMONY OUTLINE

What follows is a sample adverse handwriting expert witness deposition outline that can also be reworked to use as an outline testimony for trial, with some obvious deletions and rewording of questions and/or topics.

(Questioned Document Examiner Expert Witness Identification)

- Name & Business Address

(Immediate Attack Questions)

- What do you think you are an expert at?
- Ever been investigated, accused or convicted of a felony or other crime involving dishonesty or moral turpitude?
- Explain to me what is the ASTM standard for paper analysis (or any other applicable standard in your case)
- Ever been sued before? For what? Disposition?
- What are all your *Expert Opinions* in this case?

- And (for each one) the basis for that opinion is?

(Expert's Background)

- Present Employer
 - Date of Hire
 - Job Position & Duties
 - Pay Basis/Rate
 - How are you paid for your time here?
- Former Employer
 - Date Left & Reasons
 - Date of Hire
 - Job Position & Duties
 - Pay Basis/Rate
- Purpose of your testimony is to help *Def* win this case, right?

(Background)

- What is your Profession?
 - please describe what that profession entails or concerns?
 - what do you do on a daily basis (for your employer)?
- Licensed by State in your Profession?
 - Remember, no professional industry licensing exists

(Education - Training)

- Please tell us about your Professional Education and Training
 - Colleges attended
 - Remember, a bachelor degree is required by ASTM E2388-05
 - Name, dates, degrees
 - Graduate Work
 - Course work related to your field ?

(Professional Associations)

- With What Professional Associations are you affiliated?
 - American Board for Document Examiners
 - Board for Document Examiners
 - American Academy of Forensic Sciences
 - National Association of Document Examiners
 - Association of Forensic Document Examiners
 - Southwest Association of Forensic Document Examiners
 - Southeast Association of Forensic Document Examiners

- membership requirements ?
- offices held ?
- Have you published any Professional Articles or Writings?
- Have you been a Consultant with any government agency?

(Experience)

- Who did you train under in your field
 - Remember, 2 years of full time training under an expert's document examiner's supervision is recommended by ASTM E2388-05
 - research their trainer for any discrediting information available
- What are the stages, in sequence, of your normal document examination process?
 - Remember: Analysis, Comparison, Evaluation, and Peer Review

(Industry Equipment Knowledge)

- Tell me about your knowledge and experience with the standard equipment used in the questioned document examination process?
 - Remember the standard equipment: Handlens, stereomicroscope, camera, Electrostatic Detection Apparatus, Video Spectral Comparator

(Court Experience)

- Approximately how many Court appearances have you made in the last 10 years?
- Has a court ever held that you did not qualify as an expert under the *Daubert* standards of reliability?
- Approximately how many legal consultations have you conducted in the last 10 years?
- Have you given any Prior consultations for defendants in cases?
 - how many?
 - for whom?
 - how long have you maintained that professional relationship with them?
- Have you given any Prior consultations for plaintiffs in cases?
 - how many?
 - for whom?
 - how long have you maintained that professional relationship with them?

- Have you given any Prior testimony for the defendant in this case?
 - where?
 - when?
 - how long have you maintained that professional relationship with them?

- Have you given any Prior testimony for this defense counsel?
 - where?
 - when?
 - how long have you maintained that professional relationship with them?

- Have you ever given testimony on behalf of a consumer before?

- Ever been given any tips or training on how to be a witness or to testify?

- Have your company been through the lawsuit process before?

(Handwriting Examination Experience)

- During the last 10 years have you had the occasion to examine questioned documents/questioned handwriting?
 - For what purposes?
 - How many times in an average month?
 - How often do you observe or verify the existence of a non-authentic signature or forgery, on average, would you say?

(Prep for depo)

What did you do to prepare for this deposition?

- talk with anyone?
- examine any documents or notes or records or photographs?
- look at any Expert Reports?
- read any depositions?

Have you given a deposition before in any case?

- when?
- where?
- what for, why?

Have you given testimony before in court on any case?

- when?
- where?
- what for, why?

Have you prepared an expert report before in any similar type of case?

- when?
- where?
- what for, why?

Do you, or your employer, have any relationship to the defendant in this case?

By whom were you approached to testify?

- the defendant's attorney?
- the defendant?

What are the Reasons? What is the Purpose of your testimony?

- to help the defendant win this case
- to help the defendant convince the jury that they are right

Do you have any Professional relationship with any parties or counsel?

- Any social relationship?

How are you paid for your time here?

- flat rate for time

Is your payment or rate of pay contingent upon the results of your testimony?

Do you know the plaintiff's expert witness?

- opinion of his honesty?

(Knowledge of Questioned Document at Issue in Case)

Did you have any direct contact with the author of the disputed document in this case?

- WHERE, WHEN, WHAT, WHY, HOW, NET RESULT OF IT

Did you have any direct contact with any other person about the questioned document in this case?

- WHERE, WHEN, WHAT, WHY, HOW, NET RESULT OF IT

Where and when and how did you obtain possession of the questioned document(s) in this case, and the known exemplars you used?

- How do you know the exemplars are genuine?

(The Expert's Inspection)

What was the process of your examination of the questioned document in this

case?

- What did you do, step by step
 - What ASTM standard/protocol was applicable to each step

What are all your opinions about the questioned document in this case?

- What is the basis for each opinion?
- Remember the *Daubert* factors and inquire as to each of them:
 - A. be verifiable, refutable, and testable
 - B. be valid and reliable
 - C. subject to published peer review
 - D. held to standards within the field
 - E. be generally accepted in the scientific community

(The Expert's Inspection, General Questions)

What was the Date you were first contacted about this matter?

- by who?
- what is every questioned document you inspected?
- what is every genuine exemplar you inspected?
- Who was present during any part of your inspection?

What Physical evidence was inspected by you?

- what Actions were taken by you during your inspection?
- Photo's?
- When you took these photographs, what did you do to make sure that the images you recorded would be accurate?
- Are these all the photographs you took?

Did you Perform or conduct any tests?

Did you arrive at any unusual findings?

Did you request any peer review of your findings?

- WHERE, WHEN, WHAT, WHY, HOW, NET RESULT OF IT

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