**Impeachment by Contradiction**

1. Is it your sworn testimony today that \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
2. Do you remember writing an affidavit for today’s case?
3. And you knew you had to be truthful and complete while writing it, correct?
4. *(To judge)* Permission to approach opposing counsel and the witness with Mr./Ms. \_\_\_\_\_\_\_\_\_\_’s affidavit for impeachment purposes.
5. (*Show opposing counsel, then approach witness)* This is your affidavit correct?
6. That is your signature on the back, correct?
7. You knew you had 24 hours before court today to make changes to this affidavit?
8. I’ll be referring to lines \_\_\_\_\_\_\_\_\_\_ (lines that disprove statement). Please read silently while I read aloud.
9. (Read contradictory statement)
10. Was I accurate in my reading?
11. *(To judge)* Permission to approach the witness to retrieve the affidavit?
12. \*Continue with questioning\*

**Impeachment by Omission**

1. Is it your sworn testimony today that “\_\_\_\_\_”
2. Mr/Ms/Dr. \_\_\_\_\_\_, you made a sworn affidavit before coming to court today, correct?
3. And you knew you could make changes to this affidavit anytime before court today?
4. You knew that you had to include all relevant and pertinent information, correct?
5. Isn't it true that nowhere on your affidavit did you state that “(invention of fact)” ?
6. Your honor, at this time I would like to approach the witness with his/her sworn affidavit for impeachment purposes. Permission to approach opposing counsel and the witness?
7. Mr/Ms/Dr.\_\_\_\_, do you recognize this document?
8. Are all the pages there?
9. Is it a fair and accurate copy?
10. Is that your signature on the back?
11. Now Mr/Ms/Dr.\_\_\_\_, I want you to show me where in the affidavit you mentioned “\_\_(invention of fact)\_\_”
12. Your honor, permission to approach to retrieve the document?