

## Questions for Strangulation Expert

### I. Laying the Foundation

- A. Occupation
  - 1. What is your occupation?
  - 2. How long have you been employed in that capacity?
  - 3. Describe the responsibility of your position.
- B. Education/training
  - 1. What is your educational background?
  - 2. What was your area of concentration?
  - 3. What additional studies have you undertaken?
- C. Licenses/certificates
  - 1. Do you hold any licenses or certificates related to your profession?
  - 2. What was required of you to obtain these?
  - 3. What is required to maintain your licenses/certificates?
- D. Professional affiliations
  - 1. Do you belong to any professional organizations?
  - 2. What are the nature and purposes of these organizations?
- E. Training/teaching experience
  - 1. Have you attended conferences or trainings specific to strangulation? Explain specifics.
  - 2. Have you conducted any training or teaching yourself?
    - a. For whom did you conduct these training sessions and programs?
    - b. What areas were covered in that training?
    - c. How many attended these training sessions?
    - d. How often do you conduct training sessions?
- F. Previous expert testimony
  - 1. Have you testified in court previously as an expert?
  - 2. How many times?
  - 3. For the defense or the prosecution?
- G. Do you have scientific, technical, or other specialized knowledge that could assist the jury to understand the evidence regarding strangulation?

### II. General Discussion of Strangulation

- A. Structures involved (*Use diagram of neck*)
  - 1. Could you please describe the structures in the neck involved in the flow of blood to and from the brain? Structures involved in breath/airflow?
  - 2. Please explain how these structures are vulnerable to external pressure.
  - 3. Discuss how little pressure is required to impede these structures. (*Use hand dynamometer if available.*)
  - 4. Use a tube/hose to demonstrate that impeding doesn't mean fully blocking but simply slowing flow of breath or blood (*or save to end of questioning*)
- B. Terms
  - 1. Please explain strangulation in general terms.
  - 2. Please explain the difference between strangulation and choking.
  - 3. What are the methods of strangulation? (*e.g., manual, ligature, hanging*)
  - 4. Please describe how blood flow can be occluded during manual strangulation.
  - 5. Please describe how air flow can be impeded during manual strangulation.
  - 6. How can a person die during strangulation from occlusion of blood flow?
  - 7. How can a person die during strangulation from occlusion of air flow?
  - 8. How can a person die after being strangled?
  - 9. Would victims who survive strangulation necessarily have visible injuries? Why not?

C. Experience with strangulation

1. Have you performed an autopsy/treated/interviewed a person who has been strangled?
2. If so, how many? In what circumstances?
3. Have you examined literature regarding survivors of strangulation?
- iv. What are some potential medical complications for victims of strangulation?

D. Signs and symptoms of strangulation

1. What is a "sign" versus a "symptom"?
2. What are the signs of strangulation?
3. What are the symptoms of strangulation?
4. Are the signs and symptoms of strangulation different for manual v. ligature strangulation?
5. Which of signs and symptoms would you describe as resulting from internal injuries? Which result from external injuries?
6. How long can these be expected to last?
7. Please compare injury from occlusion to acute injury. Would it help to discuss the physical sensation of hitting your "funny bone"?
8. How do these compare with strangulation?
9. Please describe the signs and symptoms of impeding the flow of blood to the brain. *(Expert can go through signs and symptoms already admitted and included on chart.)*
10. Please describe the signs and symptoms of impeding the flow of blood from the brain. *(Expert can go through signs and symptoms already admitted and included on chart.)*
11. Please describe the signs and symptoms of impeding breathing by applying pressure to a person's neck or throat. *(Expert can go through signs and symptoms already admitted and included on chart.)*
12. Are there any potential physical consequences of strangulation that develop over time? Please describe.
13. Please describe the emotional stages leading up to unconsciousness.
14. What happens if strangulation continues after a person is unconscious?
15. Please describe the relative vulnerability of the neck to the arm.

E. Evidence of defensive wounds

1. Is it common for victims of strangulation to inflict injuries on themselves? How?
2. Do victims sometimes inflict injuries on the perpetrator during strangulation? Please describe. *(Useful for the bite mark on chest of perpetrator who used a "chokehold" or any other defensive injury.)*

**III. Hypothetical Questions**

Please assume the following facts....*[Describe the facts in evidence from the testimony of the police officer, the victim, and witnesses.]*

1. In your opinion, are these facts consistent with someone who has been strangled??
2. Return to each specific piece of evidence that correspond to the descriptions already given.

**IV. Fact Witness**

*[This assumes medical records have been admitted using business records and statements for purposes of medical diagnosis.]*

1. Now directing you to the records for treatment of the victim, please describe what signs of strangulation were observed externally.
2. Please describe what signs of strangulation were observed internally.
3. Please describe what symptoms of strangulation were reported or observed.
4. How are these consistent with strangulation?