**Tip: Tab 2--Witness Chart, Scheduling Interviews & Proof Analysis**

**Witness Chart & Scheduling Interviews:**

- Fill in the [Witness Chart](Witness%20Chart.docx) as you identify witnesses while reviewing the evidence

- Use Witness Chart for discovery, Trial Plan & Gov’t Witness List to avoid duplication of effort

-- For Trial Plan & Gov’t Witness List: Delete “Funding Info” column, select remaining cells with data, then copy and paste into [Trial Plan at Tab 1](../1.%20%20Trial%20Checklist,%20Trial%20Plan%20and%20Scheduling%20Order/Trial%20Plan.docx) and [Gov’t Witness list at Tab 10](../10.%20%20Govt%20Witness%20List,%20Order%20of%20Witnesses%20&%20Directs%20with%20Potential%20Objections/Govt%20Witness%20List.docx)

-- For Discovery: Delete last three columns & save in [Tab 5--Discovery](../5.%20%20Discovery%20and%20Subpoenas) to give to defense; (you can also delete “notes” column, or leave general note as a courtesy to orient defense)

- Case paralegal fills in contact, funding, and schedule info when setting up initial interviews

-- Trial counsel provides open appointment times to paralegal to schedule witness interviews

**Proof Analysis:**

- The [proof analysis](Proof%20Analysis%20Template.docx) matches up the evidence with the elements of the charges

-- Lining up evidence for elements shows what documents and witnesses are needed at trial

-- Use the MCM and Judge’s Benchbook to find elements ([linked in Tab 32](../32.%20%20Electronic%20References/Tip%20Tab%2032--Electronic%20References.docx))

-- In trial, keep the proof analysis available to check off elements as evidence is presented

**To Prepare a Proof Analysis:**

- After reading all the evidence and filling in the Witness Chart, list the potential offenses in the Charges section near the top of the proof analysis

- Interview all key witnesses

- Insert the narrative, either copied from AMJAMS or drafted by you – this is the start of your opening statement prep

- Insert the charge article, title, and max punishment for each of charges into the proof analysis charge tables

- Using the sample specifications at the end of each charge in the MCM, draft the specifications and insert into the proof analysis

-- Don’t worry about perfect form at this point – the Proof Analysis, including the specifications, is a work in progress that evolves as you prepare your case

- Insert the elements of the charge into blue Element headers and populate the columns

- Add up the maximum punishments and insert in the Total Maximum Punishment section