

THE PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.)
)
 JASON HUNT)
)
 Defendant)

INFORMATION

Now comes the People of the State of Illinois by the State's Attorney and informs this Court that on or about September 24, the defendant committed the offense of ARMED ROBBERY in that the defendant, while armed with a firearm, took property, being the day's cash proceeds, from the person of Mary Altgeld.

STATE'S ATTORNEY

PEOPLE V. JASON HUNT

Part I - MARY ALTGELD

Cross

Mary Altgeld was robbed at gunpoint of a shopping bag that contained, among other things, the day's receipts from the grocery store she and her husband own. Each night they carry the money home in this bag for deposit the next day, and this fact is pretty much a family secret. Jason Hunt would have known, though, as he worked in the store until three weeks before the robbery.

Cross-examine Mary Altgeld on the basis of Officer Anderson's police report and the preliminary hearing excerpt (attached). Assume that her trial testimony has been consistent with what she said at the preliminary hearing.

GENERAL OFFENSE
CASE REPORT
CHICAGO POLICE

1. OFFENSE/INCIDENT - PRIMARY CLASSIFICATION

Armed Robbery

1. IACR OFF.

2. SECONDARY CLASSIFICATION

3. A.O. NO

R-1160943

SCENE	ADDRESS OF OCCURRENCE NO. DIR. STREET 4, 9, 2, 5 N Parkside	APT. NO.	5. FINE RELATED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	6. DATE OF OCCURRENCE - TIME DAY MO. YR. 24, 9 last 21:10	7. BEAT OF OCCUR 1612	8. BEAT/UNIT/LESLIE 1612
	9. TYPE OF LOCATION OR PREMISE WHERE OFFENSE OCCURRED (GIVE NAME OF LOCATION IF APPLICABLE) Street	10. LOCATION CODE	11. DATE R.O. ARRIVED - TIME 24, 9 last 23:30	12. ASSIGNED BY <input checked="" type="checkbox"/> ON VIEW <input type="checkbox"/> SUPERVISOR		

All information, descriptions and statements in this report should be based on the facts and observations of the reporting officer.

20. NO. VICTIMS	21. NAME (LAST-FIRST-M.I.)	IDENTITY VERIFIED	22. HOME ADDRESS (NO., DIR., STREET, APT. NO.)	23. SEX-AGE-CODE	24. HOME PHONE	25. BUSINESS PHONE	26. TIME AVAIL.	27. OCCUPATION	28. S. JURED YEE 1,2	29. ICHTM REL CODE
	Altgeld, Mary	<input checked="" type="checkbox"/>	4925 N. Parkside	F 2, 41	892-1641	892-1923		Store Owner	X	DNA - (DOES NOT APPLY)

30. NO. WIT.	31. <input type="checkbox"/> DISCOVERED <input checked="" type="checkbox"/> WITNESSED <input checked="" type="checkbox"/> REPORTED OFFENSE	32. NAME	33. SEX-AGE-CODE	34. HOME PHONE	35. BUSINESS PHONE	36. TIME AVAIL.	37. OCCUPATION	38. S. JURED YEE 1,2	39. ICHTM REL CODE
	Altgeld, Karl	4925 N. Parkside	M, 2, 56	892-1641	892-1923				

40. NO. OFF.	41. OFFENDER'S NAME (OR DESCRIBE CLOTHING, ETC.)	42. HOME ADDRESS	43. SEX-AGE-CODE	HEIGHT	WEIGHT	EYES	HAIR	COMPL.	MARKS, SCARS, ETC.	44. C.B.I.R. NO	45. OFF. ICHTM REL CODE
	Hunt, Jason	5417 W. Jenkins	M, 2, 34	5'09"	150	B1	Br		pony tail	none	DNA

50. CIRCUMSTANCES	51. OBJECT/WEAPON <input type="checkbox"/> USED <input checked="" type="checkbox"/> DISPLAYED <input type="checkbox"/> UNK	52. FIREARM FEATURES	53. POINT/ENTRY	54. POINT/EXIT	55. BURGLAR ALARM	56. SAFE BURGLARY METHOD	57. IF RESIDENCE, WHERE WERE OCCUPANTS
	<input checked="" type="checkbox"/> 01 HAND GUN <input type="checkbox"/> 02 SHOTGUN <input type="checkbox"/> 03 RIFLE <input type="checkbox"/> 04 KNIFE <input type="checkbox"/> 05 VEHICLE <input type="checkbox"/> 06 BLUNT INSTRUMENT <input type="checkbox"/> 07 THROWN OBJECT <input type="checkbox"/> 08 EXPLOSIVE <input type="checkbox"/> 09 LIQUID/GAS <input type="checkbox"/> 10 BOTTLE/GLASS <input type="checkbox"/> 11 RAZOR <input type="checkbox"/> 12 PRY TOOL <input type="checkbox"/> 13 HAND, FEET <input type="checkbox"/> 14 OTHER <input type="checkbox"/> 15 DNA	<input type="checkbox"/> 01 CHROME/NICKEL <input checked="" type="checkbox"/> 02 BLUE STEEL <input type="checkbox"/> 03 SHORT BARREL <input type="checkbox"/> 04 LONG BARREL <input type="checkbox"/> 05 SAWED OFF <input type="checkbox"/> 06 OTHER <input type="checkbox"/> 07 UNKNOWN <input type="checkbox"/> 08 DNA	<input type="checkbox"/> 01 FRONT DOOR <input type="checkbox"/> 02 REAR DOOR <input type="checkbox"/> 03 WINDOW <input type="checkbox"/> 04 ROOF <input type="checkbox"/> 05 FLOOR <input type="checkbox"/> 06 SIDE DOOR <input type="checkbox"/> 07 OTHER <input type="checkbox"/> 08 UNKNOWN <input type="checkbox"/> 09 DNA	<input type="checkbox"/> 01 FRONT DOOR <input type="checkbox"/> 02 REAR DOOR <input type="checkbox"/> 03 WINDOW <input type="checkbox"/> 04 ROOF <input type="checkbox"/> 05 FLOOR <input type="checkbox"/> 06 SIDE DOOR <input type="checkbox"/> 07 OTHER <input type="checkbox"/> 08 UNKNOWN <input type="checkbox"/> 09 DNA	<input checked="" type="checkbox"/> DNA <input type="checkbox"/> 01 YES <input type="checkbox"/> 02 NO <input type="checkbox"/> 01 YES <input type="checkbox"/> 02 NO	<input type="checkbox"/> 01 PUNCH <input type="checkbox"/> 02 TORCH <input type="checkbox"/> 03 EXPLOSIVE <input type="checkbox"/> 04 DRILL <input type="checkbox"/> 05 REMOVED <input type="checkbox"/> 06 PEEL <input type="checkbox"/> 07 OPEN <input type="checkbox"/> 08 UNKNOWN <input checked="" type="checkbox"/> 09 DNA	<input type="checkbox"/> 01 WORK <input type="checkbox"/> 02 VISITING <input type="checkbox"/> 03 VACATION <input type="checkbox"/> 04 WEDDING <input type="checkbox"/> 05 FUNERAL/WAKE <input type="checkbox"/> 06 OTHER <input type="checkbox"/> 07 UNKNOWN <input checked="" type="checkbox"/> 08 DNA

70. PROPERTY	71. DESCRIBE PROPERTY IN NARRATIVE T - TAKEN; R - RECOVERED	72. VEHICLE/TRAILER YEAR MAKE	73. BODY STYLE COLOR V.I.N.	74. STATE LICENSE NO.	75. STATE EXPIR. MO/YR	76. PROPERTY INVENTORY NO(S)	77. VEH. INVENTORY NO. FOUND
	<input checked="" type="checkbox"/> MONEY \$ 480 <input type="checkbox"/> JEWELRY <input type="checkbox"/> FURS <input type="checkbox"/> CLOTHING <input type="checkbox"/> OFFICE EQUIPMT. <input type="checkbox"/> TV, RADIO, STEREO <input type="checkbox"/> HOUSEHOLD GOODS <input type="checkbox"/> CONSUM. GOODS <input type="checkbox"/> FIREARMS <input type="checkbox"/> HAZ. DANG. DRUGS <input type="checkbox"/> OTHER	<input type="checkbox"/> 95, Ford <input type="checkbox"/> Taurus Blk <input type="checkbox"/> 2 FABP 22X1F B1 28 030	M NOSTO 07, IL				

80. NARRATIVE INFORMATION	81. NARRATIVE (Do not duplicate or repeat information - for explanation or additional information only)	82. SOCIETY OF VICTIM
	Victim returned home from their store with the cash proceeds of the day in the bottom of a Jewel shopping bag covered with some groceries. She parked the car in front of their house, got out and closed the door, and was faced by the offender dressed in a cowboy hat, western style boots, and a bandana covering his face. He was pointing a B/S revolver at her. Offender said, "I'll take that," and grabbed the	<input checked="" type="checkbox"/> 1. SOBER <input type="checkbox"/> 2. HBD - HAD BEEN DRINKING

90. POLICE PERSONNEL	91. EXTRA COPIES REQUIRED <input checked="" type="checkbox"/> NORMAL <input type="checkbox"/> CONT'D. OTHER SIDE	92. OFFICER NOTIFYING FOLLOW UP INVESTIG. UNIT	UNIT NOTIFIED PERSON	<input type="checkbox"/> NOTIFIED <input type="checkbox"/> ARRIVED	DATE (DAY-MO-YR) - TIME	
	93. FIRST OFFICER AT SCENE R. J. Anderson	94. OFFICER NOTIFYING	<input type="checkbox"/> 1ST O/S <input type="checkbox"/> E.T. <input type="checkbox"/> M.L.	PERSON	<input type="checkbox"/> NOTIFIED <input type="checkbox"/> ARRIVED	
	95. REPORTING OFFICER'S NAME (PRINT) R. J. Anderson #14723	96. OFFICER'S SIGNATURE <i>R. J. Anderson</i>	DATE INVEST. COMPLETED - TIME 25/9/last 02:45	97. SUPERVISOR APPROVING (PRINT NAME) J. Hasso #4517	STAR NO.	
	98. REPORTING OFFICER'S NAME (PRINT) P. Reynolds #16992	99. OFFICER'S SIGNATURE <i>P. Reynolds</i>		APPROVAL SIGNATURE <i>J. Hasso</i>	DATE APPROVED 25, 9 last 1430	

R-1,6,0,9,4,3

shopping bag from her hand and fled N/B on Parkside to
to his car.

with the routine of taking the money home every night in
the shopping bag for deposit the next day.

Witness Karl Altgeld (Box 31), husband of victim,
was at home when he heard his wife pull up and heard
the car door slam. He went outside to help her in and
saw the offender running away. When she told him what
had happened, he ran after the offender and saw him get
into his car (blk. Ford Taurus Box 72) parked a block
away, approx. 5045 N. Parkside.

Offender worked for vic and witness in their store
up until 3 weeks ago when he was fired. He was familiar

I HAVE REVIEWED THIS REPORT AND BY MY SIGNATURE INDICATE THAT IT IS ACCEPTABLE. *S. Hassel* SUPERVISOR'S SIGNATURE DATE (DAY-MO-YR.) 25.9 (last)

FOR USE BY BUREAU OF INVESTIGATIVE SERVICES ONLY

1-UCR OFFENSE CODE - <input type="checkbox"/> CORRECT <input type="checkbox"/> REVISED	REV. CODE	1-UCR METHOD CODE	METHOD ASSIGNED <input type="checkbox"/> FIELD <input type="checkbox"/> ADMIN. <input type="checkbox"/> SUMMARY	UNIT NO.	OFFICER ASSIGNED STAR NO.	DATE ASSIGNED	SUPV. STAR NO.	INVESTIGATIVE FILE <input type="checkbox"/> YES <input type="checkbox"/> NO	REASSIGNED <input type="checkbox"/> YES <input type="checkbox"/> NO
OFFICER REASSIGNED - DATE STAR NO.		STATUS <input type="checkbox"/> PROGRESS <input type="checkbox"/> SUSPENDED <input type="checkbox"/> UNFOUNDED <input type="checkbox"/> CLEARED CLOSED <input type="checkbox"/> CLEARED OPEN <input type="checkbox"/> EXC. CLEARED OPEN <input type="checkbox"/> CLOSED-NON-CRIMINAL			IF CASE IS CLEARED, NOW CLEARED (USE THIS BOX FOR SINGLE CLEAR UP OR FIRST CLEAR UP OF MULTIPLE CLEAR UP LIST) <input type="checkbox"/> ARREST & PROSECUTION <input type="checkbox"/> DIRECTED TO FAMILY COURT <input type="checkbox"/> COMPL. REFUSED TO PROSECUTE <input type="checkbox"/> COMMUNITY ADJUSTMENT <input type="checkbox"/> OTHER EXCEPTIONAL <input type="checkbox"/> ADULT <input type="checkbox"/> JUV.				
VICTIM IDENTIFIERS <input type="checkbox"/> CORRECT <input type="checkbox"/> REVISED	VICTIM NO.	REVISED NAME		REVISED ADDRESS				REVISED PHONE NO. <input type="checkbox"/> HOME <input type="checkbox"/> BUSINESS	
VALUE OF PROPERTY TAKEN/RECOVERED <input type="checkbox"/> MONEY <input type="checkbox"/> JEWELRY <input type="checkbox"/> FURS <input type="checkbox"/> CLOTHING <input type="checkbox"/> OFFICE EQUIPMT. <input type="checkbox"/> TV, RADIO, STEREO <input type="checkbox"/> HOUSEHOLD GOODS <input type="checkbox"/> CONSUM. GOODS <input type="checkbox"/> FIREARMS <input type="checkbox"/> NARCOTICS/DRUGS <input type="checkbox"/> OTHER <input type="checkbox"/> NONE	<input type="checkbox"/> DNA <input type="checkbox"/> VERIFIED <input type="checkbox"/> CORRECTED	FILL IN THE FULL AMOUNT OF ONLY THOSE VALUES WHICH EITHER DIFFER FROM OR WERE NOT REPORTED ON THE REVERSE, THE NARRATIVE OR A SUPPLEMENTARY REPORT.							
SERIAL NOS. OR IDENTIFICATION NOS.	<input type="checkbox"/> DNA <input type="checkbox"/> VERIFIED <input type="checkbox"/> CORRECTED	LIST ALL CORRECTIONS & NEW OR ADDITIONAL NOS. OBTAINED							

REMARKS (PERTINENT INFORMATION NOT ON ORIGINAL REPORT)

PREPARED BY - SIGNATURE STAR NO. DATE (DAY-MO-YR.) APPROVED BY - SIGNATURE STAR NO. DATE (DAY-MO-YR.)

Excerpt of testimony of Mary Altgeld at the Preliminary Hearing of October 14 [last].

Q. Calling your attention to September 24 at approximately 9 o'clock in the evening, where, if anywhere, were you?

A. I was just leaving the store. We close every night at 9.

Q. Did you have anything with you?

A. Yes, I was carrying a shopping bag with the day's receipts in it. We were going to deposit it the next day. We do that all the time.

Q. Where did you go?

A. I drove to our house at 4925 N. Parkside.

Q. When you got there, did anything unusual happen?

A. Yes, it did. When I got out of the car and turned to go into the house, there stood Jason dressed up like a robber in a western movie. He had a gun.

Q. What if anything did he say to you?

A. He said, "I'll take the money, Mary," and he grabbed the shopping bag out of my hand.

Q. What was he wearing?

A. He had on boots and a cowboy hat, and over his face he had a red bandanna or blue, some dark color.

Q. How did you know it was the defendant?

A. Oh. I recognized his voice. And when he grabbed the shopping bag, the mask slipped down and I could see his face.

Q. What happened next?

A. He walked away. Then my husband came out to meet me and I said, "That man in the hat stole our money."

Q. Then what happened?

A. Then my husband started to run after him, but the robber was running too. He got in his car and drove off.

Q. And then you called the police?

A. Yes, my husband did.

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Part II - KARL ALTGELD

Cross

Here you are to cross-examine Karl Altgeld, knowing (but not necessarily using the fact) that Jason Hunt's Ford Taurus was totally destroyed in a garage fire two days before the robbery occurred. You will be able to prove it up as part of your case without calling Hunt to the stand.

You also know that in the defense case you will call one Debra Meekins of 4926 N. Parkside. She is something of a busybody and will advance your cause in two ways:

First, she will say that she was in the grocery store on September 3 at about 8 p.m. when Karl Altgeld fired Jason Hunt. Mary Altgeld was not present. According to Debra, Karl accused Jason of "messing-around" with his wife. "Do you think I'm blind?" he said. "Do you think I don't see what's going on under my nose between you and Mary?" He also said, "You're fired, Jason. I want you out of here and I want you out of here right now. Go some place else if you want to wreck a happy marriage," or words to that effect.

Second, Debra Meekins will testify that on the evening of the robbery she went outside a little after nine because she thought she heard fireworks. She saw Karl Altgeld running down the street shooting his gun at a man who was running away. She has seen him with the gun before, on many occasions. Everyone has.

You know, however, and are ready to prove, that no gun has ever been registered with the city to a Karl Altgeld, nor has he applied with the State for a FOID card.

PEOPLE V. JASON HUNT

Part III - CHRIS CONWAY

Background Information

In the course of investigating this case, Pat Pinkerton, our investigator, while canvassing the neighborhood talked with Altgeld neighbor Chris Conway who lives at 4928 N. Parkside which is across the street from the Altgeld residence. Chris stated that a few nights earlier about 9:00 p.m., Conway was looking out the front window and saw a man dressed up in cowboy clothes and hat on the porch of the Altgeld house. Although Conway did not recognize the man, Conway knows our client, Jason Hunt, as the young man who works in the Altgeld store which Conway patronizes and from seeing him occasionally entering and leaving the Altgeld residence and the man Conway saw wasn't Jason Hunt.

Because a few minutes later Conway heard what sounded like fireworks outside, Conway thought the Altgelds were having some kind of costume party or celebration and thought no more about the incident at the time.

After learning this, our investigator reported back to us the substance of this conversation. Accordingly, Chris Conway was listed as a defense witness; however, last week when you went to the Conway house to interview Chris Conway in preparation for this trial, Conway would not talk to you stating only that the police had recently "visited." Sure enough a few days ago, the State gives you a copy of a supplemental police report which, in substance, states:

My name is Chris Conway and I live at 4928 North Parkside across the street from the Altgelds. On the night of September 24 of last year, shortly after 9:00 p.m., I was standing on my porch when I saw Jason Hunt in the Altgeld's front yard. Jason was dressed in a cowboy hat, western style boots and a bandana partially covering his face. Even though he had a bandana partially covering his face, I recognized him as the young man I have often seen working in the Altgeld store. I did not think it unusual for him to be there for a party or something especially when a few minutes later, I heard what sounded like fireworks coming from across the street and it wasn't until several days later I learned Mary Altgeld had been robbed by Jason.

The State also tenders you a copy of a "rap" sheet for Chris Conway listing no prior arrests or convictions but containing a recent entry showing Chris Conway's arrest for

Possession of Cannabis with intent to deliver within 1000 feet of a school by Officers Jones and Smith who work in the same district as the arresting officers in this case.

Further investigation discloses that early last October, Chris Conway was driving home from work and was stopped and pulled over by the police in front of the neighborhood public school for a minor traffic violation. Claiming they detected the smell of marijuana, the officers searched Conway's car and found a quantity of cannabis in the glove box. Although Chris Conway has no prior record, Conway was arrested and charged with possession with intent to deliver more than 2.5 but not more than 10 grams of a substance containing cannabis on a public way within 1000 feet of the real property comprising a school, a Class 4 felony (See 720 ILCS 550/5.2(d) and 5(f)). This charge is currently pending and Chris has hired a lawyer for this case.

Hunt Case Timeline

Last September 24 - Mary Altgeld Robbed

Few Days Later - Witness Chris Conway makes oral statement to defense investigator

Early Last October - Arrest of Chris Conway

After Arrest - Is spoken to by Police - Changes story

**CHRIS CONWAY'S ORAL STATEMENT TO OUR INVESTIGATOR
GIVEN SEPTEMBER 29**

My name is Chris Conway and I live at 4928 N. Parkside, just across the street from Carl and Mary Altgeld who live at 4925. A few nights ago about 9:00 p.m. I was looking out of my front room window and saw a man on the porch of the Altgeld house. He was dressed up in cowboy clothes and hat.

Although I do not know who this man was, I know it wasn't Jason Hunt because I shop at the Altgeld store and know Jason from seeing him there and from occasionally seeing him entering and leaving the Altgeld's house. Because of the man's dress, I assumed the Altgeld's were having a party or celebration of some kind especially when a few minutes later I heard what sounded like fireworks. Accordingly, I thought no more about it at the time.

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Part III - CHRIS CONWAY

Exercise A

Cross - Prior Inconsistent Statement

The State does call Chris Conway at trial. You are going to impeach this witness.

You should know that Chris Conway will not deny but will admit giving the September 29 oral statement to your investigator.

A. Cross examine this witness.

B. Impeach the witness with the September 29 oral statement.

(NOTE: Here, concentrate on the September 29 oral statement and why it should be believed. In Exercise B, you will further discredit the witness' new story, explaining to the jury why the witness flipped.)

(To be performed live by Faculty & Actor)

SCRIPT: Direct Testimony of Chris Conway

(My name is Chris Conway. On September 24 of last year, about 9:00 at night, I was at my home located across the street from the Altgeld residence.)

Q: Do you know the defendant, Jason Hunt?

A: Yes, I know him from shopping at the Altgeld family store where he works.

Q: That night did you see the defendant Jason Hunt at the Altgeld home?

A: Yes, I was standing on the porch when I saw Jason Hunt dressed up in a cowboy outfit standing in the Altgeld's front yard.

Q: What did you do then?

A: Because he was in this cowboy costume, I watched him for a few minutes but since I knew him, I thought nothing more about it and went back inside my house.

PEOPLE V. JASON HUNT

Part III - CHRIS CONWAY

Exercise B

Cross - "Flipper"

Now cross-examine Chris Conway telling the jury a story, giving them a scenario and explaining why Conway flipped.

COACHES NOTES

People v. Jason Hunt

Part III

Witness Chris Conway

Note here the favorable oral statement that the neighbor witness Chris Conway gave our investigator. Secondly, instead of a rap sheet cross, this exercise offers a cross regarding favorable treatment on Conway's pending cannabis case. Lastly, it is possible as in the Jefferies case, that actor scheduling could result in Conway being a woman witness.

ACTORS' NOTES - Jason Hunt Case

Witness - Chris Conway

Part III

You are a neighbor of the Altgelds and have been for a number of years. You also shop at their store on occasion. The story you gave the defense investigator is the truth and you don't deny that you told him that, however, since your school days you have been occasionally using marijuana. Unfortunately, a week or so after the robbery, you had your personal "stash" in the glove box when two officers from the same police district as the officers who arrested Jason Hunt stopped your car across the street from the local public school, searched the glove box and found it. Although you have no prior record of any kind and you aren't a cannabis dealer, you were not charged with the Class B misdemeanor of simple possession of 10 or less grams of cannabis but with the Class 4 felony of possession with intent to deliver of cannabis within 1000 feet of a school. After your arrest when you were turned over to the State's Attorneys' investigators, you were told how important it was to make sure that what you said in court was the "real truth" and that if you told the "real truth," they would advise the prosecutor and the officers in your drug case of the value of your testimony in the Hunt case. You also know that the possible penalty for the charge you are facing is a possible sentence of not less than one and more than three years in prison and that probation is also possible but if the case is not prosecuted as possession with intent to deliver within 1000 feet of a school, the offense could be a Class A (possession with intent to deliver) or Class B (possession only) misdemeanor with a possible 1 year (Class A) or 6 month (Class B) sentence with probation also possible.

Finally, you are aware that the prosecution has the power to reduce any charge to a lesser one as well as to completely dismiss it.



HUNT CASE

Foundation

Laying a Proper Foundation: Altgeld Residence Photo

Q: I'm showing you what's been marked as Defense Exhibit Number 1. This is a picture of the front porch of the Altgeld's home, isn't it?

A: Yes.

Q: It truly and accurately depicts the way the Altgeld's front porch looked at 9:00 p.m. on September 24th of last year, doesn't it?

A: Yes.

COUNSEL: Your Honor, I ask that the identification marks be stricken and the exhibit be admitted into evidence.

COURT: That will be allowed.

Continue questioning about the photograph. Or, if you want the jury to see the photo as you are cross-examining the witness, first say:

COUNSEL: Your honor, I also ask that the exhibit be published to the jury.

COURT: That will also be allowed.

Then project the photo for all to see and continue questioning.