

1 **Direct Examination of Character Witness for defendant Michelson**

2 **(Michelson is on trial for having bribed an IRS agent.)**

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4 [Witness is sworn in and introduced to the jury with pedigree information]

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6 Q: Do you know the defendant John Michelson?

7

8 A: Yes.

9

10 Q: How do you know him?

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12 A: We knew each other in high school, and we have remained close friends ever since.

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14 Q: So how long have you known him?

15

16 A: About thirty years.

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18 Q: And what is your opinion of his character?

19

20 A: John is a very honest man. He is a truthful and law-abiding citizen.

21

22 Q: What leads you to this conclusion?

23

24 A: Well, he has worked as a sales representative for twenty years, and in that line of work  
25 there is a great temptation to fiddle with your stats, to make them look better than they  
26 are in the year-end report. But he's never done that.

27

28 Q: Do you know other people who know Mr. Michelson?

29

1 A: Yes, we belong to the same club downtown and we have many common business  
2 associates.

3

4 Q: Have you ever had the chance to discuss Mr. Michelson with these common  
5 acquaintances?

6

7 A: Yes.

8

9 Q: Have you ever talked about his reputation?

10

11 A: Oh yes. Mr. Michelson's reputation is very good in the community. He is known as a  
12 peaceful, quiet man, who will never start an argument and never hold a grudge against  
13 anyone.

14

15 Q: What about his reputation for honesty?

16

17 A: He is known throughout the community as an honest man and a law-abiding citizen.

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20 [Cross-examination]

21

22 Q: Mr. Witness, are you aware of the fact that twenty years ago Mr. Michelson was  
23 convicted of selling watches without the proper trademark?

24

25 A: No, I never heard of such a thing.

26

27 Q: And are you aware of the fact that twenty-one years ago, Mr. Michelson was convicted  
28 of smoking marijuana?

29

30 A: No, I did not know that.

31

1 Q: And did you know that twenty-five years ago, he was arrested on a charge of receiving  
2 stolen property?

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4 A: That was only an arrest; it turned out to be a misunderstanding.

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