

# SANE NURSE

## FOUNDATION

Name  
Where employed  
Title there  
Typical duties

### **Education**

Bachelor's in Health Services  
Associates in Nursing  
Board certified in nursing

### **SANE Nurse**

(take this from basic background education/go to experience and expertise/then go to pediatric specific specialty)

Forensic Nurse Examiner  
Specific training for safe nurse  
Specific pediatric training  
Certified in adolescent and adult  
Not certified in peds – why (\$\$\$)

### **Experience**

How long been nurse  
How long been sexual assault nurse examiner?  
3 years  
How many sexual assault exams performed?  
How many on children

## CASE SPECIFIC

Employed in present capacity on (date)?

How learn of case  
What did you do  
Role?  
Typical exam? What differ here?

### **Go through extent of exam here.**

Introduction of self and role – *to provide medical care!*

Consent

History

medical surgical, including allergies/medications

Head-to-toe exam

all body systems

injury identification – tx if needed  
forensic photography, if requested  
forensic swabbing, if needed  
STI/pregnancy testing  
prophylaxis  
Suicide assessment  
Danger assessment, prn  
Safety plan (may be with Advocate)  
Discharge instructions  
return to ER if symptoms persist, worsen, or new ones appear  
referrals:  
follow-up medical: STI/pregnancy testing  
mental health  
injury reassessment, if needed  
advocate

### **Photos**

Describe each photo/identify what picture taken for/what does it show (or not show as the case may be)

### **TEACHING**

#### **(step down from witness stand)**

Explain injuries from the diagram from start to finish as what is found on the photos and SAE.

#### **Accidental v. non-accidental**

As an **expert**, you are entitled to render opinions dealing with both cause and manner of injury, i.e. accident or non-accidental.

Likelihood of accidental injury here?

(shows intent, more than typical accident, type of force, inconsistent with defendant's statement regarding accident)

#### **Mechanism**

Could a finger or fingers cause this injury?

Under what circumstances?

Consistent with wiping?

Force?

Violent?

Consistent with sexual abuse?

Could a penis cause this injury?

What circumstances

#### **(go back to witness stand)**

## **STORIES**

Now, I want to go through some stories the defendant has said and want your opinion on those.

1. One story the defendant told is that the victim fell on a plastic storage container, or “tote” – in your opinion is that what happened here?
  - a. why?
  - b. Possible?
2. Another story the defendant told is that his knee gave out while wiping her? In your opinion, is that what happened here?
  - a. Why?
  - b. Possible?
3. Wiping her, scooting her up, went in second time
4. Was falling off bed, scooted her up while fingers inside of her
5. That the defendant was frustrated and angry and did it?
  - a. That sounds correct.
  - b. opinion doesn't include the semen next to blood
  - c. opinion doesn't include the erection cream found on the desk
    - i. those things go to sexual gratification, outside of your review?

## **OPINION**

Based on your exam as a sexual assault forensic nurse examiner, do you have an opinion on this case? (YES)

What is that opinion? (Lyza sustained a penetrating trauma consistent with sexual abuse.)

What leads you to that conclusion? (severe penetrating trauma to her vaginal area)

## **Possible Redirect**

### **Bias**

-Nurse Smith, you were asked about your relationship to the Police Department. Do you work for the police department? (No, ma'am. I'm employed by a hospital.)

-Who is your supervisor?

-Does the hospital pay your salary?

-Are you compensated in any way by any law enforcement agency, or by the District Attorney? (No.)

-Are you in any way answerable to the police chief, or any other official in the PD? (No.)

-What about the Prosecuting Attorney? Are you answerable to them in any way? (No.)

-Does the hospital receive more money in reimbursement for a sexual assault examination if injuries supportive of an assault are noted? (No.)

-How do you view the women brought to you as possible sexual assault victims? (I view them as patients, to be treated with dignity and care as I would any other patient. As an expert examiner, though, I have to view them neutrally. I examine their anatomy to see what, if anything, the anatomy can tell me.)

-Have you developed any feelings toward the defendant in this case? (No.)

-Do you have any stake whatsoever in the outcome of this case, Ms. Demkowitz? (No.)

### **Expert Opinion**

Want to address the opinion is based on medical science, not on the prosecution theory!!!!!!!!!!!!