Hannah McFarland

CERTIFIED DOCUMENT EXAMINER

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Jacob M. Downs, Esq. Corr Downs PLLC 100 W. Harrison Street, Suite N440 Seattle, WA 98119

RE: Examination of handwritten Greeting Card

Dear Mr. Downs:

Since 2002, I have been certified by the National Association of Document Examiners (NADE). I currently serve on the Executive Board of Directors of NADE as Secretary. I previously served three terms as Secretary of NADE in addition to previously serving as Membership Chair on the Board of Directors.

Since the mid-1990's, I have received extensive training pertaining to forensic document examination and handwriting identification. As a result of my education, training and experience, I have testified as an expert witness 92 times in both federal and state courts in Washington, Idaho, Oregon and Alaska. In addition to trial testimony, I have provided expert testimony in arbitrations, depositions, administrative hearings and other legal proceedings. My resume is attached as Exhibit A.

Examination of Greeting Card I conducted an independent examination of a copy of a handwritten greeting card to determine who wrote it. The greeting card begins with "Adrian, When I think about you." This questioned document is not dated but I understand it was found at or around May 2023. This questioned document is hereinafter referred to as Q-1 and is attached as Exhibit B.

I was provided with a copy of Q-1 and exemplar documents that are included with the Report of Findings dated 10-17-2024 provided by forensic document examiner Robin D. Williams, MFS, MS, D-BFDE. Hereinafter I refer to this report as the "Report of Findings."

Exemplars of Jamie Tompkins For comparison I examined 26 copy documents represented as having been written by Jamie Tompkins. I compared these documents to each other to determine if they were all written by the same person.

Opinion My finding is that it is probable that the body of of JT-K-1 was not written by the writer of the other documents represented to have been written by Jamie Tompkins. JT-K-1 begins with "Thank you for saving" and is attached as Exhibit C.

Methodology In conducting this handwriting comparison I used a four-page inventory of handwriting and document characteristics. Thus, my analysis is complete as there are many characteristics in handwriting that need to be evaluated.

I used illuminated magnification while examining the documents in this case.

<u>Exemplars</u> Following are exemplars of Jamie Tompkins (excluding JT-K-1). A person's handwriting can change over time thus the exemplars are listed chronologically. By arranging the exemplars chronologically changes in handwriting over time are more easily observed. These exemplars are attached as Exhibit D.

The name used for each exemplar in the Report of Findings is shown in parenthesis in the list of exemplars.

- E1 Mortgage Rider (MERS) dated 12-12-2016 (JT-K-6)
- E2 Deed of Trust dated 12-15-2016 (JT-K-5)
- E3 Seattle Police Department Employee Addresses and Telephone Numbers dated 6-8-2023 (JT-K-3)
- E4 City of Seattle New Employee Orientation information (lower half of page) dated 6-8-2023
- E5 Seattle Police Department document regarding gender and ethnicity dated 6-8-2023
- E6 Seattle Police Department document regarding EEO complaints (lower half of page) dated 6-8-2023
- E7 Seattle Police Department document regarding new employee policies (lower half of page) dated 6-8-2023
- E8 Seattle Police Department document regarding Confidentiality of Records (lower half of page) dated 6-8-2023
- E9 Journal Entry that begins with "Four of Cups" written during November 2023
- E10 Journal Entry that begins with "Ten of Cups" written during November 2023

- E11 Journal Entry that begins with "Knight of Pentacles" written during November 2023
- E12 Social Security card (lower half) dated 8-12-2024
- E13 Washington Driver License (lower half) dated November 2024
- E14 Request exemplar Personal Data form dated 8-30-2024 (WR-4-K-1)
- E15 Request exemplar Handwriting Sample Form dated 8-30-2024 (WR-4-K-2)
- E16 Request exemplar Handwriting Sample Form with content that begins with "Our London business is good" dated 8-30-2024 (WR-4-K-3)
- E17 Request exemplar content begins with "McQuaid and Robert Unger, Esq." dated 8-30-2024 (WR-4-K-4)
- E18 Request exemplar Personal Data form dated 9-11-2024 (WR-4-K-5)
- E19 Request exemplar Handwriting Sample Form dated 9-11-2024 (WR-4-K-6)
- E20 Request exemplar Handwriting Sample dated 9-11-2024 (WR-4-K-7)
- E21 Request exemplar Request Writing Samples form dated 9-11-2024 (WR-4-K-8)
- E22 Request exemplar that begins with "American Alphabet) dated 9-11-2024 (WR-4-K-9)
- E23 Request Exemplar Handwriting Sample Form content begins with "Our London business" dated 9-11-2024 (WR-4-K-10)
- E24 Request exemplar begins with "When he arrives" dated 9-11-2024 (WR-4-K-11)
- E25 Metallic gift card, date unknown (JT-K-4)
- E26 Handwritten "Tay" on lined paper, date unknown (JT-K-2)

From now on I identify exemplars that are included in the Report of Findings by the name used in the Report of Findings. Exemplars E4 to E13 are not included in the Report of Findings and are identified as such in my report.

<u>Analysis</u> Following are differences between JT-K-1 and the exemplars of Jamie Tompkins.

a) JT-K-1 is more fluently written than the exemplars of Jamie Tompkins. Exhibit E illustrates this;

b) Handwriting can be divided into 3 zones accordingly:



The height of middle zone letters and letter sections is more variable in JT-K-1 than in the exemplars of Jamie Tompkins. Exhibit F illustrates this;

- c) The width of letters is more variable in JT-K-1 than in the exemplars of Jamie Tompkins. Exhibit G illustrates this;
- d) Space between letters is variable in JT-K-1 yet the exemplars of Jamie Tompkins have consistent letter spacing. Exhibit H illustrates this; and
- e) The exemplars of Jamie Tompkins have many lower extensions that do not have a loop. JT-K-1 has four of four lower extensions that each have a loop. Exhibit I illustrates this.

The combination of all differences between JT-K-1 and the exemplars of Jamie Tompkins provides significant evidence that Jamie Tompkins probably did not write the body of JT-K-1. This degree of opinion "probably" did not write JT-K-1 is the same as "more probable than not."

My opinion regarding if Jamie Tompkins wrote the "Jamie" on JT-K-1 is inconclusive. While this partial signature has some similarities to some of the signature exemplars, the height of the upper loop in the "J" in "Jamie" is taller in many exemplars than the "Jamie" that is on JT-K-1.

Opinion regarding Q1 and JT-K-1 It is my opinion that the person who wrote Q-1 probably wrote the body of JT-K-1. Despite repeated requests to examine the original of Q-1 I only had access to a copy of Q-1.

<u>Evaluation of the Report of Findings</u> The opinion in the Report of Findings is that it is highly probable that Jamie Tompkins wrote Q-1. Attached to the Report of Findings are Charts 1 to 20 illustrating the reasons for the opinion.

Following are reasons why my opinion differs with the opinion expressed in the Report of Findings.

1) Chart 1 and Charts 3 to 9 rely almost entirely on similarities between Q-1 and JT-K-1 in concluding that it is highly probably Q-1 was written by Jamie Tompkins.

As explained above it is my professional opinion that the body of JT-K-1 is probably not written by Jamie Tompkins. Thus, relying on JT-K-1 as representing the handwriting of Jamie Tompkins does not result in a sound forensic opinion.

2) Chart 2 attached to the Report of Findings purports to show similarities between Q-1 and Jamie Tompkins request exemplars WR-4-K-7, WR-4-K-8, WR-4-K-10 and WR-4-K-11

This chart shows that the personal pronoun "I' in Q-1 and the lower case letter "f" in exemplars of Jamie Tompkins are similar.

The appearance of the "I's" from Q-1 and the "fs" in exemplars of Jamie Tompkins is somewhat similar. However, they are written differently. The "I's" are made clockwise and the "fs" are made counterclockwise. This is apparent by evaluating the pressure pattern in Q-1 and the exemplars of Jamie Tompkins.

Another difference is that the initial upstroke in the letter "I" is straight in Q-1 whereas the "f" in the exemplars of Jamie Tompkins show an initial stroke (an upstroke) that is curved.

These differences in how the "I's" and "f's" are made suggest two different writers wrote them. Exhibit J illustrates this.

3) Page 4 of the Report of Findings under "Opinion" says that request writing samples of Jamie Tompkins dated Sept. 11, 2024 (WR-4-K-5 to WR-4-K-11) show evidence of disguise. These exemplars are written in cursive.

My examination included three pages of non-request exemplars of Jamie Tompkins from November 2023 listed above as E9, E10 and E11. Exemplars E10 and E11 include cursive writing that that is very similar to the request writing of Jamie Tompkins dated Sept. 11, 2024.

WR-4-K-5 to WR-4-K-11 as well as E10 and E11 are written slowly, at a low skill level and some letters are excessively traced. The non-request cursive exemplars E10 and E11 indicates to me that the request exemplars of Jamie Tompkins from September 11, 2024, are most likely not disguised.

Characteristics noted in the Report of Findings as indicating disguise (such as a lower skill level) can also be a normal way of writing for some people as seen in E10 and E11. Relying on request exemplars to determine disguise is not always reliable. Exhibit K illustrates this.

Paragraph 3 of page 5 of the report says, "It is the opinion of this examiner that the three other subjects who provided request handwriting exemplars made no attempt to disguise their handwriting."

The request exemplars provided by Writer #1 are written very slowly and with a lot of tremor. There are many awkward strokes, letters that are traced, as well as patching. All of these characteristics are considered possible indications of disguise. Non-request exemplars of Writer #1 are needed in order to determine if the possible signs of disguise in the request exemplars of Writer #1 are actually caused by disguise.

4) Charts 13, 16, 17, 18, and 19 in the Report of Findings notes differences in the signatures in the request exemplars of Jamie Tompkins from 9-11-2024 and signatures on JT-K-1, JT-K-3, JT-K-5 and JT-K-6. These differences are noted to support the opinion in the Report of Findings that the request exemplars of Jamie Tompkins dated 9-11-2024 are disguised.

E12 is a non-request signature exemplar from a social security card dated 8-12-2024. E13 is a non-request signature from a Washington Driver License from November 2024. These signatures look similar to the request exemplars dated 9-11-2024.

It is my understanding that Ms. Tompkins deliberately changed her signature in 2023 because her signature had been repeatedly forged. This could explain the differences noted in Chart 13 and Charts 16 to 19 attached to the Report of Findings.

<u>Summary</u> Because of the reasons stated above my opinion is that Q-1 and JT-K-1 were probably not written by Jamie Tompkins.

Respectfully,

Hannah McFarland, CDE

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