EXHIBIT G

United States District Court, S.D. West Virginia.
Romie R. EDENS, Jr., Plaintiff,
v.
George L. KENNEDY, individually and/or in his capacity as a Senior Trooper for the West Virginia State Police, Defendant.
No. 2:01-0933.
July 22, 2003.

Deposition of James A. Blanco

Case Type: Civil Rights & Constitutional Law >> Search & Seizure
Jurisdiction: S.D.W.Va.
Name of Expert: James A. Blanco
Area of Expertise: Forensics >> Document Examiner/Handwriting
Representing: Unknown

Honorable Charles Haden.

LAW OFFICES OF STEPTOE & JOHNSON

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Certified Court Reporter

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Q That's not my question. My question is, in the world of possibilities, is it possible that Q-1 and Q-2 were signed by Magistrate Carper?

A In the world of possibilities, I have to give you that and say that's a possibility.

Q It's possible that Q-1 and Q-2 were, in fact, signed by Magistrate Carper?

A Yeah, but you understand that's not my testimony.

Q I understand that, but you agree that it's possible?

A It's possible.

Q I want you to look at Q-1 and Q-2 and tell me what similarities Q-1 and Q-2 have to K-1 through K-8? In other words, if I hired you and said I want you to prove to me that Q-1 and Q-2 were, in fact, signed by the same person that signed K-1 through K-8, what similarities would you look at to prove that?

A Okay. To focus on similarities?

Q Yes.

A I would say the general form of the T bears some similarity with the specimen signatures. The R in the given name, there is some similarities. I'm looking. The lower case I, its form and its proportion to the C bears some similarity. The middle initial L in its slant, in its relationship of the upper loop or upper motion, if you will, to the lower left motion bears some similarity. The P bears some construction and form similarity to the P?? below or the specimen Ps. And the extension, the final extension of the sir name bears some similarity with the final extension of the sir name, I don't have it right here, but it's the first known specimen signature at the top left.

Q K-1,2, I believe?

A K-l,2, yes.

Q And that's you comparing Q-1 to K-l through K-8, correct?

A That is correct.

Q If you compare Q-2 to K-1 through K-8, what similarities do you see between Q-2 and K-1 through K-8?

A Well, for the most part the same.

Q Okay.

A For most part the same.

Q Any differences between Q-1 and Q-2, any similarities that you see in one that you don't see in the other one?

A Not that I note right here. Not that I

Q So I couldn't go out and hire an expert, you think, that would testify to the exact contrary to what you've testified here today?

A Sure, you could.

Q Because experts, you can pretty much get them to say anything, can't you?

A Yes, you could.

Q All right. Let's talk a little bit more and then I'm going to wrap this thing up. I think you already said this, but I want to make sure I'm right. You're not going to testify that the trooper was the person that "forged these documents"?

A Correct, I'm not going to say -- I'm not prepared to say he did.

Q And you're not going to say that at trial?

A Correct, I won't.

Q I noticed that --

MR. SUWAK: I may have to get one of those experts you say I can get to say anything for that purpose.

BY MR. MULLINS:

Q I think on Exhibit 14, it looks like you have

circled something there and highlighted?

A Yes.

?? element, if you will, that doesn't enter into your equation at all?

A No, it doesn't.

Q How strong is your opinion in this case?

A I have stated in my formal report that the signature is a forgery, and to me, that's a high level of certainty.

Q How high of a level of certainty is that for you?

A Well, that's what I believe it is. In my experience and training and based on the evidence that I have available to me, that's my conviction and my belief is that they are forged.

Q Are you're talking about a 51 versus 49 percent or how strong is your conviction that this is, in fact, a forgery?

A Well, keeping in mind I'm not a mathematician, just trying to state that, trying to put it in a percentage, I'd say 95 percent.

Q So you're 95 percent sure you're correct?

A Yes.

Q Willing to stake your professional reputation On that?

A Oh, absolutely.

END OF DOCUMENT