

THE X LAW GROUP

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Attorneys for Plaintiff,

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES – SANTA MONICA COURTHOUSE**

M	)	CASE NO. SC
	)	
Plaintiff,	)	<i>[Assigned for all purposes to Hon. Judge N,</i>
	)	<i>Dept. Z]</i>
vs.	)	
	)	
N, et al.	)	<b>DECLARATION OF MARCEL MATLEY</b>
	)	<b>IN SUPPORT OF PLAINTIFF’S</b>
Defendants.	)	<b>OPPOSITION TO MOTION TO COMPEL</b>
	)	<b>FURTHER RESPONSES TO, AND</b>
	)	<b>PRODUCTION OF ORIGINAL</b>
	)	<b>DOCUMENTS IN RESPONSE TO,</b>
	)	<b>DEMAND FOR INSPECTION</b>
	)	<b>PROPOUNDED BY DEFENDANT N</b>
	)	
	)	
	)	<b>Date: , 2014</b>
	)	<b>Time: 8:30 a.m.</b>
	)	<b>Dept.: Z</b>
	)	
	)	Complaint Filed: , 2013
	)	

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I, MARCEL MATLEY, declare as follows:

1. I am an Examiner of Questioned Documents and Handwriting and have been so employed since 1985. I have been certified as an expert witness in the field of questioned documents in the Federal Bankruptcy Court, Federal District Court, Federal Immigration Court, California Municipal and Superior Courts, in Arbitration and Administrative Hearings in the State of

California, in the Circuit Court of the State of Hawaii, and in the Probate Court of the States of New Jersey and Texas. A copy of my current Curriculum Vitae and General Resume, outlining my training, experience, qualifications, and professional activities, is attached hereto as "Exhibit A" and incorporated herein by reference. My Curriculum Vitae includes a complete list of my professional publications. I know the foregoing and the following to be true of my own personal knowledge, save only and except as to those matters set forth on information and belief, and as to those matters, after reasonable and diligent investigation of the facts relating thereto, I believe them to be true. If called upon to testify thereto, I could and would do so competently.

2. I have reviewed the Declaration of Expert X filed in support of Defendants' Motion to Compel in the instant case. Plaintiff has requested an evaluation of the scientific validity, technical reliability, and practical utility of the proposed destructive testing by Expert X of the stock certificates purportedly signed in 2003, which Defendants claim were signed in 2012.

3. Based upon my review of Expert X's Declaration and the relevant scientific literature, as well as my own experience and expertise, I have concluded that Expert X's Declaration provides no basis for an intelligent evaluation of the proposed destructive testing, for the following reasons:

(a) Expert X does not describe the full protocol for the proposed destructive testing but states only one step, which is to remove portions of the ink line of the signature, thus permanently destroying the integrity of the ink line;

(b) Expert X does not state the scientific theory underlying the proposed destructive testing;

(c) Expert X offers no citations to the scientific literature in support of the proposed type of destructive ink testing, nor to any other type of destructive testing of ink, either in general or specifically; and,

(d) Expert X gives no description of what laboratory equipment he will employ, or what laboratory materials, and gives no indication of their use and reliability for the purposes that the proposed destructive testing will allegedly serve.

4. There is no generally accepted theory of destructive ink testing, nor is there a generally accepted method of destructive ink testing. Therefore, regardless of the method of testing which Expert X plans to employ, any ink dating of the stock certificates can only yield controversial, problematic and questionable results. Unless the ink tester can discover, account for and compensate for all the factors that physically and chemically might have affected the document during its creation, handling, storage and use, current ink dating methods simply cannot differentiate ages of writings outside of controlled laboratory experiments, especially where a signature was executed in either 2003 or 2012 and considering all of the variables that can affect the test results.

5. Ultraviolet light (UV), as well as heat, ages ink, while type of paper and the ink formula itself are variables affecting the aging process.<sup>i</sup> Additionally, the chemistry of some dyes can actually change by exposure to fluorescent illumination – such as that present in a typical office setting.<sup>ii</sup> Prolonged exposure to daylight can render ink testing unreliable, as some components in ink decompose upon exposure to daylight, making different formulas of ink indistinguishable from one another.<sup>iii</sup> Contact with other documents over an extended period of time can cause components in the ink dyes to migrate from one document to another. In considering these variables, one must consider the environmental factors affecting both the ink pen used to sign the document, as well as the document in question.

6. Since one can rarely if ever know whether any given document underwent such exposures as described above, the methods used to perform destructive ink dating are problematic and unreliable at best.

7. The relevant professional literature overwhelmingly mitigates against considering any specific one of the several protocols for destructive ink testing as undisputedly and scientifically valid, as well as technically reliable because of general acceptance as of this time.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on \_\_\_\_\_, 2014.

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MARCEL MATLEY

i *Journal of Forensic Sciences*, Vol. 47, pages 1265-73, Nov. 2002. "Evaluation of laser desorption mass spectrometry and UV accelerated aging of dyes on paper as tools for the evaluation of a questioned document." Authors: Grim, Donna M., et al.

ii *Journal of Forensic Sciences*, Vol. 47, pages 1238-47, Nov. 2002. "Ballpoint pen inks: characterization by positive and negative ion-electrospray ionization mass spectrometry for the forensic examination of writing inks." Authors: Ng, Lay-Keow, et al.

iii *Journal of Forensic Sciences*, Vol. 47, pages 324-7, 2002. "Changes in composition of ballpoint inks on aging in darkness." Author: Andrasko, Jan. and Vol. 46, pages 21-30, 2001. "HPLC analysis of ballpoint inks stored at different light conditions." Author, Andrasko, Jan.

# *A and M Matley Examiner of Documents & Handwriting*

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SINCE 1985

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## **Curriculum Vitae with Professional Publications of MARCEL B. MATLEY Examiner of Questioned Documents & Handwriting**

### **PROFILE:**

Marcel B. Matley has been a document examiner since 1985, providing a spectrum of services in the discipline. His experience includes evaluation of the work product of examiners to unearth their accuracy and/or their mistakes by establishing proper observation, logic, scientific theory and technical methods.

### **EXPERIENCE INCLUDES:**

- Assistance in discovering erroneous, incomplete or incompetent opinions regarding documents and handwriting.
- Consultant to other document examiners.
- Handwriting authentication and signature verification, including numerals.
- Genuineness of logs, diaries, and other writings in series.
- Determination and demonstration of alterations, deletions or additions to documents.
- Formulation of questions for voir dire of opponent's document examiner.
- Preparation of pertinent citations for cross-examination from learned treatises.
- Identification of the writer of poison pen letters and anonymous writings.
- Examination of foreign scripts.
- Other aspects of questioned document examination.

### **CREDENTIALS:**

- Board Certified, National Association of Document Examiners, October 2000.
- Vanguard Network, Board Certified Handwriting Professional, April 28, 1998.
- Certification with commendation, Paul de Sainte Colombe Center, January 28, 1981, with honorary Charter Membership Certificate, April 8, 1982.
- Consultant and mentor to other document examiners.
- Confidentially consulted by several public agencies on administrative issues.

### **REFERENCES:**

Available upon request.

*Curriculum Vitae, Marcel B, Matley, page 1 of 8 pages. Revised, May 03, 2014.*

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## CLASSES AND LECTURES:

- Presentations at NADE Conferences:
  - 2014, Honolulu, HI: *The Eight Directional Movements in Handwriting*.
  - 2013, Omaha, NE: *Daubert is an Expert's Best Friend*.
  - 2011, Montreal, Canada: *Knowing the Daubert Criteria*. Co-presented with J. Joseph.
  - 2010, Portland, OR: *Rhythm in Handwriting: Its Determination & Value in Identification*.
  - 2009, Boca Raton, FL: *Impeachment: Countering Incorrect Opinions*.
  - 2008, Austin, TX: Pre-conference with Jacqueline Joseph, *The Two Pillars of Individuality and Identifiability in Handwriting*.
  - 2007, Tucson, AZ: Pre-conference with J. Joseph, *Book Smarts for Document Examiners*.
  - 2006, aboard Mariner of the Seas: *You're a what? Featuring techniques for inoculating the jury (including CD)*.
  - 2004, Anaheim, CA: Pre-conference: *Daubert and Handwriting Expert*. Conference: *Kumho Case*.
  - 2003, New Orleans, LA: *Humorous Moments in History of Handwriting Expertise*.
  - 2002, Ann Arbor, MI: *Examination of Russian Birth Certificates*.
  - 2001, Crawley, England: *Angle Value* [jointly with Maureen Ward-Gandy]; *A Case with the Kinderprint*.
  - 2000, Albuquerque, NM: *How to Read Things Critically*.
  - 1994, Concord, MA: *Answering Challenges on Voir Dire*.
  - 1993, San Francisco, CA, two-day intensive course: *The Physiology and Forensic Identification of Handwriting*.
  - 1992, Atlanta, GA: *Human Graphic Motor Sequence*.
- Poster Sessions at NADE Conferences:
  - 2014, Honolulu, HI: *Hand Etching on Brass Plate of Civil War Era Carbine*.
  - 2012, San Diego, CA: *Fingerprint Case*.
  - 2008, Austin, TX: *Alleged Chinese Suicide Note*.
  - 2004, Anaheim, CA: *INS Case*.
  - 2003, New Orleans, LA: *Daubert*.
  - 2002, Ann Arbor, MI: *Examination of Russian Birth Certificates*.
  - 2000, Albuquerque, NM: *Examination of Graffiti Writing*.
- 2003 AAHA/AHAF Joint Conference: *Alzheimer's and Handwriting; Linguistic Changes in the Normal Elderly* [based on two forensic cases and research in academic literature].
- 2002 AHAF Nor Cal Seminars: *Health and Handwriting*. March: *Toomey's 25 Health Clues*. April: *Review of Research Published in Medical Literature*.
- 1999 AAHA/AHAF Joint Conference, Post-Conference Workshop: *Physiological and Psychological Foundations* [of the production of handwriting]: *Forensic Applications*.
- 1998 Vanguard Pre-Conference: *Speed in Handwriting*.
- 1997 Vanguard Conference: *Physiology of Handwriting Exemplified by Writer's Cramp*.
- 1995 IGS-AFDE Joint Conference: *A Protocol for Research in Disguised Handwriting....*
- 1995 AHAF Symposium: *The Physiology of Handwriting*.
- 1993 ABFHA Conference: *Qualifications Impeachment*.
- 1990-1992, organizer, instructor and co-producer with Ted Widmer at the annual Seminar in Document Examination, in San Francisco.

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## **MEMBERSHIPS:**

- National Association of Document Examiners (NADE). Parliamentarian and Member of Journal Committee
- The Expert Witness Institute (EWI), London, England.
- American Handwriting Analysis Foundation (AHAF).
- Vidocq Society, Philadelphia, PA, Special Member.
- The American Society for Testing and Materials (ASTM). Committee E30.
- American Association for the Advancement of Science (AAAS).
- Scientific Association of Forensic Examiners (SAFE). Board Member.

## **COURT QUALIFIED WITNESS:**

Federal Courts and state Courts in California, Hawaii, Illinois, New Jersey, Texas and Vermont; and Doha, Qatar. Four-year list of testimonies available upon request.

## **EDUCATION:**

- American Academy of Forensic Sciences, Annual Meetings, Questioned Documents:  
2014, Seattle, WA, all-day workshop only, February 14: *Bias in Forensics...*  
2007, San Antonio, TX.  
2005, New Orleans, LA.  
2001, Seattle, WA.  
2000, Reno, NV.  
1998, San Francisco, CA. Saturday, attended Jurisprudence Section.
- Thermo Scientific, all-day seminar. *Spectroscopic Solutions*, June 20, 2012.
- Thermo Scientific, all-day, individual demonstration. *Nicolet IN-10, Ft-IR*, June 05, 2012.
- Thermo Scientific, all-day seminar. *Near-IR Seminar*, 2007.
- *Expert Witness Testimony that Wins*, presented by Phil Walker, JD, 2006.
- *Annual Conference*, NADE, May 19-21, 2005, Quebec, Canada.
- *Adobe Photoshop and Document Examination*, intensive workshop by Gary Herbertson, July 16-17, 2005, Berkeley, CA.
- Thermo Scientific, all-day seminar. *Vibrational Spectroscopy*, 2005.
- Seminar on forensic features in handwriting of criminals, conducted by Ted Widmer.
- 2000 Vanguard post-conference, *Forensic Document Examination*, by Judith A. Housley.
- Oregon Criminal Defense Lawyers Association, Winter Conference, Portland, OR:  
1999, *Dynamic Cross-Examination*.  
1997, *Expert Witnesses*.
- Third Annual Conference for Testifying & Consulting Experts, San Francisco, 1996. Also pre-conference: *Preparing for Cross-Examination: Developing 'Active Listening' Skills*.
- Professional Education Systems, Inc., *California Evidence Workshop*, San Francisco, 1996.
- 1979-80 privately instructed by Rose Toomey, author of *Health Clues in Handwriting*.
- Immaculate Heart College, Los Angeles, CA. MALS, June 1963.
- San Diego State College, San Diego, CA, 1962-63. Graduate studies, Political Science.
- Immaculate Heart Seminary, University of San Diego, San Diego, CA, 1954-60.  
Courses included Philosophy, Logic, Rational Psychology, History, Rhetoric.
- Saint Francis College, El Cajon, CA, 1952-54. Liberal arts, science.

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## **SPECIAL RESOURCES:**

- Personal collection of more than 13,000 items in handwriting science, document examination and case law, along with current subscriptions.
- Developed proprietary databases exceeding 12,000 citations to forensic, academic and legal periodicals and to case reporters. These are all on-going projects.
- *Haas Atlas*, the most complete collection of typewriter fonts.
- NADE and AHAF maintain lending libraries of professional literature for members.
- Both standard tools and specialized equipment, details available upon request.

## **SPECIAL HONORS:**

- AHAF Library renamed *Marcel B. Matley Handwriting Research Library*, June 09, 2012.
- First recipient of NADE Distinguished Service Citation, 2013 Conference, Omaha, NE.

## **PUBLICATIONS.**

### **Periodical Articles in Legal Journals:**

1. *At Issue*. San Francisco Association of Legal Assistants. 18:17+, June, 1991.  
Photocopies: traps for the too trusting.
2. *California Paralegal Magazine*. 3:10-11, July-Sept. 1991.  
So you never saw a forgery...or you just never caught it.
3. *California Paralegal Magazine*. 3:15-7, Oct.-Dec. 1991.  
Clues to authorship of the anonymous letter.
4. *National Paralegal Reporter*. Vol. 17, #2, Winter 1992.  
Preventing fraud with personal checks.  
NOTE: I have not seen the published version of this paper nor do I have a copy of the issue it appeared in. The above information is from the Internet.
5. *Practical Litigator*. 13:21-33, September 2002.  
Using and cross-examining handwriting experts.
6. *The Recorder*. 120:1+, Jan. 29, 1996; 120:3, Feb. 23, 1996.  
A trail of ink; how forensic experts provide hard evidence of doctored documents. [Letter to editor]
7. *San Francisco Attorney's Magazine*. 1994:5-6, April-May 1994.  
More on forensic document examiners. [Letter to editor]
8. *San Francisco Attorney's Magazine*. 25:20-2, Feb.-March, 1999.  
The expert ambush: How to hold off your opponent until the cavalry arrives. [Reproduced by permission of The Magazine in [www.ExpertPages.com/news](http://www.ExpertPages.com/news), in June 1999.]

### **Periodical Articles in Forensic Journals:**

9. *Ewitness.com. Articles*. Oct. 19, 2001.  
Deposition of experts: Q & A. Illustrated as with handwriting experts. Co-authored.
10. *Forensic Expert Witness Association Newsletter*. 2004:3, 15-16, Summer 2004.  
Handling the handwriting expert (or any other expert).
11. *International Journal of Forensic Document Examiners*. 3:103, April-June 1997.  
Letter to editor. Posted as open access on <https://archive.org/>.

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**EXHIBIT A, page 4 of 8 pages.**

12. *International Journal of Forensic Document Examiners*. 3:105-13, April-June 1997.  
Forensic handwriting identification: Is it legally a science? A review of court cases which hold handwriting examination to be a science.
13. *International Journal of Forensic Document Examiners*. 5:146-74, Jan-Dec. 1999.  
Case citations relating to court ordered exemplars and disguise of same as contempt of court and obstruction of justice; a discussion and interpretation.
14. *Journal of Forensic Identification*. 42:189-91, March-April 1992.  
Standardization of terminology for slant in handwriting. [Letter to editor]
15. *Journal of Forensic Identification*. 44:617-8, Nov.-Dec. 1994.  
Letter to editor re: "Eye-hand coordination: The logic of questioned document examination."
16. *The Journal of Questioned Document Examination*. 8:19-22, Winter 2000.  
The 1-to-1 adapter lens. A technical paper.
17. *Journal of the National Association of Document Examiners*. 12:15-8, Feb. 1991.  
The law of document examination. [Legal research]
18. *Journal of the National Association of Document Examiners*. 17:15-27, Spring 1995.  
The graphologist as expert witness; a survey of some reported cases.
19. *Journal of the National Association of Document Examiners*. 17:28-33, Spring 1995.  
A case report. {Scott Doe et al. v. Kohn, Nast & Graff}  
NOTE: Marcel B. Matley was the unnamed author of the section on case law.
20. *Journal of the National Association of Document Examiners*. 19:12-23, Spring 1996.  
A case of Chinese handwriting.
21. *Journal of the National Association of Document Examiners*. 19:1-9, Dec. 1996.  
Vox populi or a graphic ventriloquist? A case report of disguised signatures. Coauthored with Jacqueline Joseph.
22. *Journal of the National Association of Document Examiners*. 21:1-5, Spring 1998.  
The making of one's own exemplars; the post litem motam rule as illustrated by California.
23. *Journal of the National Association of Document Examiners*. 21:15-30, Spring 1998.  
The Vincent Foster "suicide note." Did Strategic Enterprises' purported experts prove it forged?
24. *Journal of the National Association of Document Examiners*. 21:5-11, Winter 1998.  
How to prove a genuine signature is forged while trying to prove it to be genuine. A study in the multiplication rule of probability theory.
25. *Journal of the National Association of Document Examiners*. 22:11-15, Fall 1999.  
Comparison of handwriting in federal court by the trier of fact.
26. *Journal of the National Association of Document Examiners*. 22:11-15, Fall 1999.  
Handwriting research: Cast a wide net. [Annotating selection of scientific papers on handwriting from *American Journal of Occupational Therapy*.]
27. *Journal of the National Association of Document Examiners*. 31:10-32, Spring 2013.  
There is more to *Daubert* than *Daubert*: Explanations and critical commentary as illustrated principally through handwriting expertise.
28. *Medical-Legal News*. 2008:9, May/June 2008.  
*Daubert* in English for medical-legal witnesses: How courts will view you.
29. *National Document Examiner*. 2:11-18, 1992.  
The difference a difference makes: Variations in handwriting identification.

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**EXHIBIT A, page 5 of 8 pages.**

30. *National Document Examiner*. 2:26-9, 1992.  
Questioned document case #2.
31. *Scientific Sleuthing Review*. 18:9, Summer 1994.  
Touting the good. [Letter to editor on dating inks]
32. *Scientific Sleuthing Review*. 23:17, Spring 1999.  
Letters to Editor. [Cites and quotes review of Dines, *Document Examiner Textbook*, jointly authored with Katherine Koppenhaver and published in *Communique* of January 1999.]
33. *Scientific Sleuthing Review*. 28:11, Fall 2004.  
Book review. *Expert witness handbook*, Dan Poynter, Santa Barbara, CA; Para Publishing, 2005, 3rd ed.

#### **Periodical Articles in Other Journals:**

34. *AHAF Journal*. 31:1, 8-9, 12, Nov.-Dec. 1998.  
The dilemma of ataxic handwriting.
35. *Ewitness.com. Articles*. Site M, 10/19/2001. 6 pages.  
Deposition of Experts: Q&A. Illustrated as with handwriting experts. Co-authored.
36. *International Handwriting Analysis Review*. 1:40, Spring 2002.  
Book review. *Alpha beta: How 26 letters shaped the Western World*, by John Man.
37. *The Vanguard*. 1998:10, October-December, 1998.
38. *The Newsletter of the National Association of Document Examiners*. Previously titled: *The Communique*. Various issues.  
NOTE: These are small items and snippets of information of sundry kinds. This publication was of a topical and ephemeral nature, and I did not retain a file of it nor a list of my various contributions except for my formal articles which are listed below.
39. *Communique*. 19:1, January 1999.  
Book review. *Document examiner textbook*, by Jess Dines. Review co-authored with Katherine Koppenhaver.
40. *Communique*. 11:3, November 2001.  
Book review. *Questioned documents, a lawyer's handbook*, by Jay Levinson.
41. *Communique*. 15:3, September 2005.  
Book review. *Alpha Beta: How 26 letters shaped the Western World*, by John Man.
42. *Communique*. 17:3, Winter 2007.  
Book review. *Forgery: Consulting Science Experiments*, by Kenneth G. Rainis.
43. *Communique*. 17:4, Fall 2007.  
Book review. *Your questions...my answers. The scientific examination of questioned documents with case histories*, by Ron R. Brown.  
Book review. *Document Examiner Textbook*, by Jess E. Dines.
44. *The Vanguard*. 2002:6-7, January-March, 2002.  
Government vs graphologically trained document examiners.
45. *The Vanguard*. 2008:11, January-March, 2008.  
Book review. *Your Questions...My Answers. The Scientific Examination of Questioned Documents with Case Histories*, by Don N. Brown.

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46. *Vidocq Journal*. 9:1+, February, 1998.

Murders they wrote.

47. *Vidocq Journal*. 9:6, May 1998.

Letter to the editor. [Regarding the Jon Benet Ramsey Murder Case]

NOTE: Letters and papers have been submitted to journals which never replied as to acceptance or rejection, so there may be published materials I am unaware of.

#### **BOOKS AND MONOGRAPHS:**

48. *Admissibility of handwriting expertise: A survey of post-Daubert cases*. Third edition, 2013.

49. *Check forgery, a simple guide*. San Francisco, Handwriting Services of California, 1988.

50. *Forgery: Detection and defense. A guidebook for legal professionals*. Handwriting Services of California, San Francisco, 1988.

51. *Oh, my aching arm! The cause and cure of general writer's cramp. A monograph in the physiology of handwriting*. San Francisco, Handwriting Services of California, 1997.

52. *QDE Index: Periodical articles in English on document examination, handwriting expertise and expert testimony*. [Formerly: *Witnessing to the truth of documents*] First edition, 1990, San Francisco, Handwriting Services of California. Latest edition 2008.

53. *Testing the Reliability of Expert Opinions in Texas: Guidelines from Kelly, du Pont/Daubert and Their Progeny*, San Francisco, A & M Matley, 2004.

#### **Series, Studies in Questioned Documents:**

54. 1. *Photocopies in Document Examination*. 1990.

55. 2. *Exorcism of Ignorance; a Reply From a Handwriting Expert. 2nd ed.: In the Exercise of Ignorance: Replies to the Critics of Handwriting Expertise*. 2000.

56. 3. *Logged Entries: Made Separately or Sequentially?* 1990.

57. 4. *Exemplars for Comparison*. 1990.

58. 5. *Health and Handwriting, an Annotated Bibliography*. 3rd ed. 2000.

59. 6. *Employing and Examining of the Expert*. 1992.

60. 7. *Reliability Testing of Expert Handwriting Opinions*. 1992.

61. 8. *Signature Disguise by Change of Slant*. 1992.

62. 9. *Examination of Russian Birth Certificates*. 2002.

#### **NON-PRINT MEDIA:**

63. *Complete Defeat for Foes of FDE: The Courts Have Spoken*. CD, 2006. [Limited edition of 100 copies for complementary distribution.]

64. *You're a What? Featuring Techniques for Inoculating the Jury*. CD, 2006. [Limited edition of 40 copies for distribution at 2006 NADE Conference.]

65. *Selected Published Works of Marcel B. Matley*. CD, 2007.

66. *Book Smarts for the Document Examiner, Featuring the QDE Index*. Pre-conference presentation with Jacqueline Joseph at NADE Conference, May 20, 2007, Tucson, AZ. DVD, 2007.

67. *The Two Pillars of Individuality and Identifiability in Handwriting*. Presented with J. Joseph on April 21 and 22, 2008, at the NADE Conference in Austin, Texas. DVD, 2008.

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68. *Affidavit by Marcel B. Matley*. Filed in Immigration Court, San Francisco, CA, April 21, 2006, regarding documents signed by Lieutenant Colonel Jerry B. Killian in reference to service in Texas Air National Guard by President George W. Bush, setting forth falsehood of purported proof that such documents were forged. May be downloaded at:

<http://archive.org/details/AffidavitByMarcelB.MatleyImmigrationCourt21April2006>.

69. *A critical evaluation of: "On the Discriminability of the Handwriting of Twins."* Explains why research published in *53 Journal of Forensic Sciences*, 430-446 (March 2008), by Sargur Srihari, Chen Huang and Harish Srinivasan, did not support the reliability of expert handwriting identification. May be downloaded at:

<http://archive.org/details/ACriticalEvaluationOfonTheDiscriminabilityOfTheHandwritingOfTwins>.

70. *Daubert is an Expert's Best Friend*. NADE Conference, April 25-26, 2013, Omaha, NE. DVD.

#### **CONTRIBUTIONS TO BOOKS AND MONOGRAPHS:**

71. *Carta & Inchiostri; tecniche di accertamento*. A cura di Pacifico Cristofanelli e Silvio Lena. 1999, AGI, Ancona, Italy.

Pages 204-209: Indagine critica sulla datazione della pasta biro. Traduzione e adattamento de Silvio Lena. [Original English title: "Dating ballpoint inks; a survey and critique."]

**MY WEB SITE, [www.handwritingexpertconsultant.com](http://www.handwritingexpertconsultant.com)**, has more than twenty pieces written by me for open access.