

Dorothy V. Lehman

FORENSIC HANDWRITING EXPERT

Direct dial number: 503/654-7156

PHILIP LOMONACO
Attorney at Law
112 Durwood Drive
Knoxville, TN 37922

November 21, 1989

QUESTIONED DOCUMENTS:

Handwritten letter to Mr. Coppedge, undated, signed "Nancy Uzdavinis". (original examined)

Handwritten letter to Mr. Merrill dated June 26, 1985, signed "Nancy Uzdavinis". (original examined - the hand printing circled in yellow and the MD in yellow are not questioned since they were added by Mr. Merrell after he received the letter.)

STANDARDS USED FOR COMPARISON:

Certified copy of Voter's Registration card dated Nov. 1, 1976, bearing the genuine signature of Nancy Uzdavinis.

Certified copy of page 397 of the Jackson County, OR, Poling Log dated May 17, 1988, bearing the genuine signature of Nancy Uzdavinis.

[Receipt from the Jackson County Clerk & Recorder, Medford, OR, for the above mentioned certified copies is enclosed.]

Three letters dated May 28, 1988, June 14, 1988, & March 6, 1989, all bearing the genuine signature of Noreen Renier. (originals examined)

Photocopies of various legal documents and letters dated in 1988 and 1989, containing a total of eight genuine signatures of Noreen Renier.

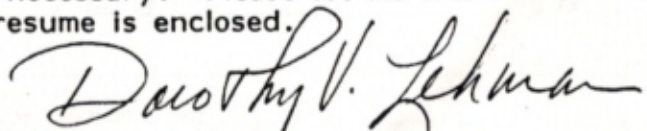
CONCLUSIONS:

It is my opinion that Nancy Uzdavinis did not execute any of the handwriting nor her signatures on the two questioned letters.

Secondly, it is my opinion that there is no doubt that Noreen Renier did execute all of the questioned handwriting, including the signatures of Nancy Uzdavinis on the two questioned letters.

I am basing my conclusion on comparing style, fluency, slant, baseline, size and size relationship, spacing, space patterns, letter formation, beginning and ending strokes, continuity, connecting strokes, the unconscious movement of the writing pattern and certain peculiarities which make each individual's handwriting identifiable.

I believe that I would have little difficulty proving the validity of my findings in a court of law should that be necessary. Please let me know if I can be of further service to you. My resume is enclosed.



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STATE OF Oregon }
County of Clackamas } ss.

I, Dorothy V. Lehman, being first duly sworn, depose and say that I am a forensic handwriting expert by profession and am attaching my resume which clearly states my credentials and experience.

I was hired by John Merrell to examine two handwritten letters purportedly written and signed by Nancy Uzdavinis and to compare the handwriting with the known genuine signatures of Nancy Uzdavinis, as well as with the known genuine signatures of Noreen Renier.

I have now completed my forensic document analysis and have arrived at a firm conclusion. It is my opinion that the two questioned letters purportedly written by Nancy Uzdavinis were not written by her, and that they were actually executed by Noreen Renier.

I am enclosing my letter of opinion to Philip Lomonaco, Attorney at Law, which I have prepared today, November 21, 1989. I affirm that all of the opinions expressed in my letter are true and authentic based upon my forensic analysis of the documents submitted.

Subscribed and sworn to before me this _____ day of _____, 19_____

Notary Public for _____
My commission expires _____

Dorothy V. Lehman

FORENSIC HANDWRITING EXPERT

Profession

FORENSIC HANDWRITING & DOCUMENT ANALYST
JURY SELECTION SPECIALIST -- CONSULTANT

Experience

Study and Research in the field since 1950
Full-time Occupation since 1970
Over 2,000 Written Reports (Letters of Opinion)
Over 130 Court Appearances giving Expert Testimony

Court Appearances as Expert Witness: Circuit, Superior & Federal Courts

Counties in OREGON: BAKER, BENTON, CLACKAMAS, CLATSOP,
COLUMBIA, CROOK, DESCHUTES, DOUGLAS, JOSEPHINE, KLAMATH,
LANE, LINN, MARION, MORROW, MULTNOMAH, UNION, YAMHILL,
WASHINGTON, LINCOLN, COOS, WASCO, GRANT, JACKSON

Counties in CALIFORNIA: LOS ANGELES, MERCED, SISKIYOU

Counties in WASHINGTON: CLARK, COWLITZ, WILKINSON

County in IDAHO: CANYON

County in KANSAS: GREENWOOD

Membership in Professional Organizations

NATIONAL FORENSIC CENTER
AMERICAN SOCIETY OF TRIAL CONSULTANTS
AMERICAN HANDWRITING ANALYSIS FOUNDATION
OREGON TRIAL LAWYERS ASSOCIATION (Non-Lawyer Associate Member)

Education

Pennsylvania Public Schools, Washington, Pennsylvania
Wheaton College, Wheaton, Illinois
Behrke-Walker Business College, Portland, Oregon
Over 100 hours of Work Shop Training in all phases of
Questioned Documents and Forgery Detection
Numerous Seminars in Handwriting Analysis and Jury Selection

Professional Library

Over 800 Scientific Manuals covering the major phases of
Forensic Research..... Most used reference books:
LAW OF DISPUTED & FORGED DOCUMENTS by J. Newton Baker,
QUESTIONED DOCUMENTS by Albert S. Osborn, *EVIDENTIAL DOCUMENTS*
by James V.P. Conway, *DISPUTED DOCUMENTS* by Hanna F. Sulner,
SCIENTIFIC EXAMINATION OF QUESTIONED DOCUMENTS by Ordway Hilton,
THE HAND OF HAUPTMANN by J. Vreeland Haring, *FORGERY DETECTION*
by Wilson Harrison, *EXPERIMENTS WITH HANDWRITING* by Robert Saudek,
HANDWRITING ANALYSIS by Ulrich Sonnemann, *JURY SELECTION* by
Walter E. Jordan, *ART OF ADVOCACY - JURY SELECTION* by Ward Wagner,
QUESTIONING TECHNIQUES & TACTICS by Jeffrey L. Kesler, *LEGAL*
PSYCHOLOGY - EYEWITNESS TESTIMONY & JURY BEHAVIOR by Craig Parker,
THE AMERICAN JURY by Harry Kalven & Hans Zeisel, *JURYWORK -*
SYSTEMATIC TECHNIQUES by The National Jury Project Inc.,
TESTIFYING WITH IMPACT by Arch Lustberg

Teaching &
Lecturing
Experience:
Seminars,
Work Shops,
Classes &
Lectures on
Handwriting &
Document Analysis

Portland Community College - Portland, Oregon
Dorothy Lehman Forensic Research Studio - Portland, Oregon
Portland State University - Portland, Oregon
Mt. Hood Community College - Portland, Oregon
Centralia Community College - Centralia, Washington
Columbia Basin College - Pasco, Washington
Everett Community College - Everett Washington
Shoreline Community College - Seattle, Washington
Lin-Benton Community College - Albany, Oregon

Attorneys
with whom
Miss Lehman
has worked on
Questioned
Document Cases
and/or
Jury Selection

PETER C. McCORD (Fredrickson, Weisensee & Cox); BURTON H. BENNETT (Franklin, Bennett, Ofelt & Martin, P.C.); J. RION BOURGEOIS (Evans, Anderson, Hall & Grebe, P.C.); EUGENE C. TISH (Knappenberger & Tish); JOHN L. LANGSIET and MARK R. WADA (Martin, Bischoff, Templeton & Biggs); MORTON A. WINKEL; DAVID R. WILLIAMS (Williams, Stark, Hiefield, Norville & Griffin, P.C.); WARDE H. ERWIN (Erwin, Lamb & Erwin, P.C.); JAMES E. BERNSTEIN (Schunaker & Bernstein); GARY M. HULLOCK; JOHN K. LOWE (Crist, Stewart & Lowe); DALE M. HARLAN; GEORGE R. WALDUM; JAMES S. COON (Sobel & Coon); MARK D. WHITLOW; FRED M. AEBI (Gearin, Landis & Aebi); JIM DICEY (Lekas & Dicey); ROBERT J. MILLER (Black, Kendall, Tremaine, Booth & Higgins); CHARLES ROBINOWITZ; JOSEPH W. MAYLIE; MARGARETTA EAKIN; JOHN S. MARANDAS (Bloom, Ruben, Marandas & Sly); THOMAS C. SAND (Miller, Anderson, Nash, Yerke & Wiener); NEALE E. CREAMER (Tooze Kerr Peterson Marshall & Shenker); MICHAEL D. KENNEDY (Kennedy, Bowles, Towsley & Soriano); DAVID J. BUONO (Lindstedt & Buono); JAMES R. CARWRIGHT; GEORGE GREGORES (Law Office of Paul J. Rask); AUSTIN CROME (Cosgrove & Kester); CRAIG COLBEY; BERNARD JOLLES; JAMES TREDUP; RICHARD STRATTON (Counsel for NLRB); RYAN LAWRENCE; DENNIS SKARSTAD; HOWARD LONERGAN; JERRY KOBELIN; LAWRENCE KLANG; RON WADE (Rankin, McMurry, Osburn, Gallagher & Vavrosky); CHARLES HODGES; ROBERT HAGEN; LOUIS SANTIAGO (Gilbertson, Brownstein, Sweeney, Kerr & Grim); JOHN J. HAUGH; JEROLD BILLINGS; BETTIS & REIF; FRANK NOONAN (Winfree & Noonan); PHILIP M. MARGOLIN (Nash & Margolin); EMERSON SIMS; RICHARD DOBBINS (Dobbins & McCurdy); DOUGLAS FELLOWS (Fellows, McCarthy, Zikes & Kayser PC); DAVID H. GREENBERG; RICHARD H. MULLER; DAVID UYEMURA; WILLIAM SIZEMORE...

Attorneys
located in
Portland &
surrounding
communities

(Partial list)
Space will not
allow a complete
list.

Attorneys
located in
other areas
as listed

(Partial list)

SALAM, OREGON: BRUCE W. WILLIAMS, KEITH EVANS, NORMAN WINSLOW, JERRY KLEEN; MICHAEL ALEXANDER (Brown, Burt & Swanson, PC)....
ALBANY, OREGON: FREDERICK L. DECKER (Goode, Goode, Decker, Beckham)
BOZEMAN, OREGON: JOHN C. FISHER (Thompson, Mumford & Anderson); HENRY G. CAMPBELL, JR.; LONG & FAULHABER; BROMLEY, CHAPMAN & FORD..
BEASLEY, OREGON: CHARLES MARSCH; JIM SLOTHOWER
VALLE, OREGON: SCHROEDER, DENNING & HUTCHENS; SWAN, BUTLER & LOONEY.
SEASIDE, WA: ALLEN D. CLARK (Davis, Wright, Todd, Riese & Jones); MAFFEO & MAFFEO; PAUL FISHER; LEE A. HOLLEY
ABERDEEN, WA: DENNIS COLWELL (Ingram, Zelasko & Goodwin)
DELLINGHAM, WA: M. LELAND BROWN
VANCOUVER, WA: BERNARD E. NEWBY; DONALD L. ENGLISH (Mitchelson & PoyFair); DIANE LANSVERK (Landerholm Memovich Lansverk Whitesides)
ORANGE, CALIF: RICHARD RIMEL (Friedemann, Menke & Adams).....
ALASKA: BERNARD P. KELLY (Kelly & Luce); MERDES, SCHAIBLE, STALEY & DELISTO, P.C.
CALDWELL, IDAHO: GREGG E. LOVAN (Rettig & Rosenberry)
AGANA, GUAM: WILLIAM ANDERSON