

Case No. 89-877

April 11, 1989

REPORT ON DOCUMENT EXAMINATION
PRIVILEGED & CONFIDENTIAL

Re: Pete Rose

Request By: John M. Dowd, Esquire
Heron, Burchette, Ruckert & Rothwell, P.A.
Attorneys at Law
1025 Thomas Jefferson Street, N.W., Suite 700
Washington, D.C. 20007

Reference: Conference with Mr. John M. Dowd at Tampa, Florida,
March 16, 1989, and letter from Mr. John M. Dowd
dated March 17, 1989.

Evidence Submitted: The following described evidence was received
from Mr. John M. Dowd:

- Q1 Photocopy of a one-page document dated 4-9-87 containing seventeen (17) lines of handprinted and numerical entries beginning "BALT. VS TEXAS....," and ending "N. D. - 2½ L."
- Q2 Photocopy of a one-page document dated 4-10-87 containing nineteen (19) lines of handprinted and numerical entries beginning "BOSTON - 6 L....," and ending "PHILLY L."
- Q3 Photocopy of a one-page document containing fifteen (15) lines of handprinted and numerical entries beginning "17750 L AR. ST. - 7 5 DIMES....," and ending "W 6 MINN AT N.O. 7."
- K1 Ninety-seven (97) original canceled checks drawn on the First National Bank of Cincinnati, Ohio, checking account of Pete Rose and dated from 1-3-87 to 10-29-88, containing exemplar handwriting, handprinting and signatures of Pete Rose.
- K2 Eighteen (18) original canceled checks drawn on the Star Bank, Cincinnati, Ohio, account of Pete Rose and dated from 11-9-88 to 1-4-89, containing exemplar handwriting, handprinting and signatures of Pete Rose.

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K3 Two (2) handwriting exemplar forms and three (3) sheets of bond paper containing handwriting, handprinting and numerical exemplars provided by Pete Rose on March 16, 1989.

On March 24, 1989 the originals of the three questioned documents were made available for comparison with the photocopies, and examination of the originals revealed that the submitted photocopies, Q1 through Q3, are true and accurate reproductions of the originals.

Examination Requested:

That it be determined, if possible, whether or not the handprinted and numerical entries on Q1 through Q3 were written by Pete Rose, K1 through K3.

Examinations Conducted:

A detailed microscopic examination was conducted of the exemplar handwriting, handprinting and numerical entries of Pete Rose appearing on the documents described as K1 through K3. This examination was accomplished with the aid of a stereoscopic binocular microscope as well as low power magnifiers and controlled illumination. The purpose of this examination is to delineate the pattern of unconscious habitual handprinting and numerical characteristics incorporated in the exemplar writings of Pete Rose. Characteristics such as writing skill, letter formation, slant, pressure variations, height ratios, beginning and ending strokes, speed of writing, rhythm, and all of the little subtle movements of the writing instrument reflect the habitual unconscious writing habits of Pete Rose, within a given range of normal variations.

After a thorough analysis of the exemplar writings of Pete Rose was accomplished, the questioned documents, Q1 through Q3, were microscopically examined to determine whether or not those documents contain the same pattern of unconscious habitual handprinting and numerical characteristics found in the exemplar writing of Pete Rose. The questioned documents were also examined for any evidence of simulation or fabrication, such as hesitations, tremor, retouching, heavy pressure throughout the writing, dissimilar letter formations and height ratios, and any other differences denoting unfamiliarity with the writing habits of Pete Rose.

Continued

Results of Examination:

Comparison of the handwriting, handprinting and numerical exemplars of Pete Rose with the questioned documents revealed significant similarities and complete agreement with the identifying characteristics found in the questioned documents. These similarities include but are not limited to the following:

1. The "A" is triangular in shape and made with an initial downstroke. The crossbar is short and slants diagonally down through the right leg. The right leg ends with a short recurve toward the left leg.
2. The "B" is made with two strokes when used as a capital letter, but is made with one continuous cursive stroke when used as a small letter.
3. The left side of the "C" is angular.
4. The "D" is made with two strokes when used as a capital letter, but is made with one continuous movement to form a cursive letter when used as a small letter.
5. Two styles of "E" are used. One is made with four separate strokes with the middle crossbar close to the top. The second "E" is made in a Greek style with a vertical stroke along the left side.
6. The "G" is made with one continuous stroke resembling the numeral "6."
7. The crossbar of the "H" is short and usually slants downward through the right leg.
8. The dot over the small "i" is frequently a small circle.
9. The upper case "L" has a sharp angle whereas the small "L" is rounded with the horizontal stroke slanting downward.
10. Both upper and lower case "M" are made alike in cursive style with one continuous movement.

Continued

11. The "N" is made with an initial downstroke and the letter is completed with one continuous movement. In some cases the letter has an exaggerated right hand slant.
12. The "O" begins and ends near the one o'clock position.
13. The upper case "P" is made with two strokes.
14. The lower case "r" is cursive style in one continuous movement.
15. The top and bottom of the "S" tend to slant downward from right to left.
16. The upper and lower case "U" end with a downstroke.
17. The "V" is made with one continuous movement and is rounded at the bottom in the shape of a "U."
18. The left and right bowl of the "W" is rounded at the base.
19. The "y" is made with one or two short strokes and has a very shallow bowl.
20. The numeral "2" has a short initial downstroke, a rounded neck and a small loop formed at the bottom left as the ending stroke swings around to the right. However, when the "2" is used in a fraction, the "2" is shaped like a "Z."
21. The "4" is made with two strokes in a triangular configuration.
22. The "8" is made with two circles with the bottom circle frequently smaller than the top.
23. The fraction " $\frac{1}{2}$ " is made with the numerals on a horizontal plane instead of a vertical plane.
24. The symbol for the ampersand is on a horizontal plane and resembles the left half of an infinity symbol.

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Attached hereto and made a part of this report is Composit Exhibit "A" which is composed of comparable letters and numerals from the questioned documents and the exemplars of Pete Rose which demonstrate the similarities enumerated above.

The only entries on the questioned documents which are not totally consistent with the exemplars of Pete Rose are the three (3) fractional entries, $8\frac{1}{2}$, $9\frac{1}{2}$ and $9\frac{1}{2}$, appearing in the lower right hand margin of Q2. Some variations were noted in those entries which could not be explained with the available exemplar writings.

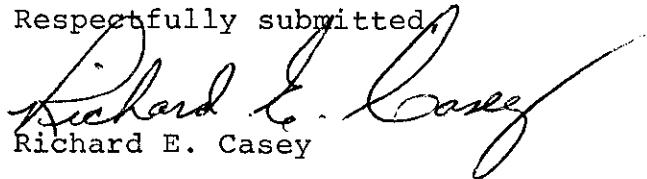
Conclusions:

1. It is my opinion that Pete Rose, whose exemplar handwriting, handprinting and numerical entries appear on K1 through K3, is the writer of the handprinted and numerical entries on Q1 and Q3.

2. It is also my opinion that Pete Rose is the writer of the handprinted and numerical entries on Q2, with the exception of the three fractional entries, $8\frac{1}{2}$, $9\frac{1}{2}$ and $9\frac{1}{2}$, appearing in the lower right hand margin of Q2. Due to the variations noted which could not be explained with the available exemplars, it was not possible to identify or eliminate Pete Rose as the writer of those entries. However, some similarities were noted which suggest the possibility that Rose is also the writer of those entries.

Photocopies of Q1 through Q3 and K1 through K3 are enclosed herewith. The original canceled checks, K1 and K2, were returned separately.

Respectfully submitted,


Richard E. Casey

REC/c
Enclosures

QUESTIONED

EXEMPLARS OF PETE ROSE

1	A A A A A	A A A A A
2	B B B B B	B B B B B
3	C C C C C	C C C C C
4	D D D D D	D D D D D
5	E E E E E	E E E E E
6	G G G G G	G G G G G
7	H H H H H	H H H H H
8	I I I I I	I I II I I
9	L L L L L	L L L L L
10	M M M M M	M M M M M
11	N N N N N	N N N N N
12	O O O O O	O O O O O
13	P P P P P	P P P P P
14	R R R R R	R R R R R
15	S S S S S	S S S S S
16	U U U U U	U U U U U
17	V V V V V	V V V V V
18	W W W W W	W W W W W
19	Y Y Y Y Y	Y Y Y Y Y
20	Z Z Z Z Z	Z Z Z Z Z
21	4 4 4 4	4 4 4 4
22	87 87 87	87 87 87 87 87
23	1/2 1/2 1/2 1/2 1/2	1/2 1/2 1/2 1/2 1/2
24	TEXAS ADM	Forty Three 2 ²⁷ / ₁₀₀

RICHARD E. CASEY
Examiner of Questioned Documents

232 AMESBURY CIRCLE
SUN CITY CENTER, FLA. 33570
(813) 634-5707

R E S U M E

OCCUPATION:

SELF EMPLOYED AS QUESTIONED DOCUMENT EXAMINER. I PERFORM EXAMINATIONS IN ALL PHASES OF THIS WORK, INCLUDING THE EXAMINATION OF HANDWRITING, HAND-PRINTING, TYPEWRITING, FORGERIES, ALTERATIONS, COUNTERFEITING AND OTHER EXAMINATIONS OF THIS NATURE.

PREVIOUS EMPLOYMENT:

I WAS A SPECIAL AGENT WITH THE FEDERAL BUREAU OF INVESTIGATION (FBI) ASSIGNED AS A DOCUMENT EXAMINER TO THE FBI LABORATORY IN WASHINGTON, D.C. I RETIRED FROM THE FBI DECEMBER 30, 1977 AFTER 27 YEARS OF SERVICE AS A SPECIAL AGENT.

EDUCATION:

GRADUATE OF THE UNIVERSITY OF GEORGIA, ATHENS, GEORGIA, IN 1949 WITH B.S. DEGREE IN CHEMISTRY. ALSO ATTENDED THE UNIVERSITY OF FLORIDA SCHOOL OF LAW AT GAINESVILLE, FLORIDA, FROM 1949 TO 1951, AT WHICH TIME I ENTERED ON DUTY WITH THE FBI.

SPECIALIZED TRAINING
AS DOCUMENT EXAMINER:

I RECEIVED MY TRAINING IN THE FBI LABORATORY IN WASHINGTON, D.C. DURING THIS TRAINING PERIOD OF APPROXIMATELY 2½ YEARS, I ATTENDED MANY LECTURES AND CLASSES ON DOCUMENT IDENTIFICATION AND STUDIED A NUMBER OF BOOKS BY WELL KNOWN AUTHORS ON THE SUBJECT. I WORKED UNDER THE DIRECTION AND SUPERVISION OF A NUMBER OF EXPERTS IN THE FBI LABORATORY WHERE MY PROGRESS WAS CONSTANTLY CHECKED THROUGH DAILY CONTACT WITH THESE EXPERTS IN THE PERFORMANCE OF MY WORK. SINCE THAT TIME I HAVE EXAMINED THOUSANDS OF CASES WHICH INVOLVED MANY THOUSANDS OF DOCUMENTS, THE MAJORITY OF WHICH CONCERNED THE COMPARISON OF HANDWRITING. I HAVE LECTURED AND INSTRUCTED ON THE SUBJECT ON MANY OCCASIONS.

QUALIFICATIONS AS EXPERT
WITNESS:

I HAVE QUALIFIED AND TESTIFIED NUMEROUS TIMES IN FEDERAL AND STATE COURTS THROUGHOUT THE UNITED STATES, MANY TIMES IN THE STATE OF FLORIDA.

CERTIFICATION:

I AM CERTIFIED BY THE AMERICAN BOARD OF FORENSIC DOCUMENT EXAMINERS (ABFDE) AS HAVING THE PROPER TRAINING AND EXPERIENCE TO RENDER ACCURATE OPINIONS REGARDING QUESTIONED DOCUMENT PROBLEMS.

4-9-87

BALT *

US

TEXAS

CHICAGO

AT

K.C.

SEATTLE

AT

CAL

ATLANTA

US

PHILLY

IND

AT

CLEU - 2 1/2

SAC + 9

US

HOUSTON

PORTLAND + 1

US

PHOENIX

DALLAS + 2 1/2

US

C. ST

WASH - 2 L

SAN ANT E L

CLEU + 6 1/2 W

DALLAS + 2 1/2 L

CHICAGO - 1 W

BOSTON L

C. ST - 6 1/2 L

CAL W

B PHILLY AT ATL. L

B LA AT HOUST L

B CIN AT MONT W

PHILLY + 8 1/2 L

N. S. - 2 1/2 L

4 10-87

BOSTON -6 L
MILL -5 W
DET +6 W
UTAH -5 L
L.A. -15 1/2 L
PORTLAND -7 1/2 L

MINN W
TEXAS L
CINCY W
PHILLY L

4-11-87

CIN W
ST LOUIS W
L.A. W

HOUS. W W
DET W
MIL W
SEATTLE W
PHILLY L

L DENVER +8 1/2
L CLEV. +9 1/2
L SAN ANT. +9 1/2
L SAC. -5

7750	L	AR. ST - 7		5 DIMES	
DEC 30 TH	L	IOWA - 4 1/2		5 DIMES	L
		OVER 56		3 DIMES	L
DEC 31 TH	L	S. CAROLINA - 3 1/2		5 DIMES	
	W	TEXAS + 3 1/2	US	5	PITTSBURG
	L	PENN ST	US	2 1/2	CLEMSON
	L	FL ST A	US		NEB.
	W	TEXAS ADM	US	5	N. DAME
	W	SYRACUSE	US	2 1/2	AUBURN
	L	U.S.C. 2	US		M.P.H ST
	W	MIAMI	US		OKI - 3
	L	ACRMANA - 2	US		MICHIGAN
	W	IND + 6 1/2	US		TENN
	W L	HOUSTON + 2	US		SEATTLE
	W 6	MINN	AT		N.O. 7

550
000
550

Adam C. Burling	<u>ADAM C BURLING</u>	A	A	T	T
Catherine E. Dolan	<u>CATHERINE E DOLAN</u>	B	B	U	U
Edward H. Fallett	<u>EDWARD H FALCETT</u>	C	C	V	V
George K. Newburg	<u>GEORGE K NEWBURG</u>	D	D	W	W
Mr. Levi Jacobson	<u>MR. LEVI JACOBSON</u>	E	E	X	X
Kitty M. Langdon	<u>KITTY M LANGDON</u>	F	F	Y	Y
Margaret P. Hymans	<u>MARGARET P. HYMANS</u>			Z	Z
Oliver R. Perper	<u>OLIVER P PERPER</u>	H	H	cc	CC
Quincy S. Roberts	<u>QUINCY S. ROBERTS</u>	I	I	dd	DD
Stancil O. Torque	<u>STANCIL O TORQUE</u>	J	J	ff	FF
Ulyssis T. Velez	<u>ULYSSIS T VECEZ</u>	K	K	gg	G.G
Warren Bud Smith	<u>WARREN BUD SMITH</u>	L	L	kk	KK
Cook F. Young, Jr.	<u>COOK F YOUNG JR</u>	M	M	pp	PP
Ned Lee Harlow	<u>NED LEE HARLOW</u>	N	N	ss	SS
Harold I. Fox, Sr.	<u>HAROLD T FOX SR.</u>	O	O	tt	TT
Don V. Chesterfield	<u>DON V. CHESTERFIELD</u>	P	P	aa	AA
1 2 3 4 5 6 7 8 9 0	<u>1 2 3 4 5 6 7 8 9 0</u>	Q	Q	bb	BB
56 West 135th Street	<u>56 WEST 135TH ST</u>	R	R	vv	VV
2033 East Quaker St.	<u>2033 EAST QUAKERS</u>	S	S	yy	YY
9944 Waltham Ave., North	<u>9944 WALTHAM AVE NORTH</u>				
8877 Hough Avenue, South	<u>8877 HOUGH AVENUE SOUTH</u>				

Write below: The above are samples of my handwriting written with my (right/left) hand. I normally write with my (right/left) hand.

THE ABOVE ARE SAMPLES OF MY
HANDWRITING WRITTEN WITH MY RIGHT
HAND. I NORMALLY WRITE WITH MY RIGHT HAND

Name	<u>PETE ROSE</u>
Street	<u>9180 GIVEN RD</u>
City	<u>CINCINNATI 45219</u>
Date	<u>3-16-89</u>
Witnessed: Initials	<u>PR</u>
Date	<u>3/16/89</u>

Adam C. Burling	<u>Adam C Burling</u>	A	<u>ADAM</u>	T	<u>T</u>
Catherine E. Dolan	<u>Catherine E. Dolan</u>	B	<u>B</u>	U	<u>U</u>
Edward H. Fallett	<u>Edward H. Fallett</u>	C	<u>C</u>	V	<u>V</u>
George K. Newburg	<u>George K. Newburg</u>	D	<u>D</u>	W	<u>W</u>
Mr. Levi Jacobson	<u>Mr. Levi Jacobson</u>	E	<u>E</u>	X	<u>X</u>
Kitty M. Langdon	<u>Kitty M. Langdon</u>	F	<u>F</u>	Y	<u>Y</u>
Margaret P. Hymans	<u>Margaret P. Hymans</u>	G	<u>G</u>	Z	<u>Z</u>
Oliver R. Perper	<u>Oliver R. Perper</u>	H	<u>H</u>	cc	<u>cc</u>
Quincy S. Roberts	<u>Quincy S. Roberts</u>	I	<u>I</u>	dd	<u>DD</u>
Stancil O. Torque	<u>Stancil O. Torque</u>	J	<u>J</u>	ff	<u>FF</u>
Ulyssis T. Velez	<u>Ulyssis T. Velez</u>	K	<u>K</u>	gg	<u>G.G</u>
Warren Bud Smith	<u>Warren Bud Smith</u>	L	<u>L</u>	kk	<u>RR</u>
Cook F. Young, Jr.	<u>Cook F Young Jr.</u>	M	<u>M</u>	pp	<u>PP</u>
Ned Lee Harlow	<u>Ned Lee Harlow</u>	N	<u>N</u>	ss	<u>SS</u>
Harold I. Fox, Sr.	<u>Harold I Fox Sr</u>	O	<u>O</u>	tt	<u>TT</u>
Don V. Chesterfield	<u>Don V. Chesterfield</u>	P	<u>P</u>	aa	<u>AA</u>
1 2 3 4 5 6 7 8 9 0	<u>1234567890</u>	Q	<u>Q</u>	bb	<u>BB</u>
56 West 135th Street	<u>56 West 135th St</u>	R	<u>R</u>	vv	<u>VV</u>
2033 East Quaker St.	<u>2033 East Quaker Sts</u>	S	<u>S</u>	yy	<u>YY</u>
9944 Waltham Ave., North	<u>9944 Waltham Ave North</u>				
8877 Hough Avenue, South	<u>8877 Hough Ave South</u>				

Write below: The above are samples of my handwriting written with my (right/left) hand. I normally write with my (right/left) hand.

The above are samples of my handwriting
written with my right hand. I
normally write with my right hand

Witnessed: Initials Alb Name Leto Gaze
Street 9180 Green Rd
Date 3/16/89 City Cincinnati 45243
Date Ohio
3-16-89

4-9-87

BALT. VS TEXAS

CHICAGO AT K.C.

SEATTLE AT CAL

ATLANTA VS PHILLY

INDIANA AT CLEVELAND

2½ 3½ 4½ 5½ 6½ 7½

PORTLAND VS PHOENIX

DALLAS VS CAL ST. - 2½

WAS. VS SANTA ANA

CHICAGO VS BOSTON

N. D. - 2½ - W - L

P.R.

3-16-89

4-10-87

BOSTON - 6 - L

MIL. - 5 - W

DETROIT + 6 - W

UTAH - 5 - L

L. A. - 15½ - L

PORTLAND - 7½ - L

MIN. - W

TEXAS - L

CINCY

PR
3-16-89

4-11-87

CINCINNATI - W

ST. LOUIS - W

L.A. - W

HOUSTON - W

DETROIT - W

PHILLY - L

DENVER - 18 1/2

CLEVELAND - 9 1/2

SAN ANTONIO - 1 1/2

P.R.

3-16-89