Telephone (513) 662-5606 James R. Dibowski Examiner of Questioned Documents 3183 Dickinson Road Cincinnati, Ohio 45211

March 16, 1989

Mr. John M. Dowd Attorney at Law Herron, Buchette, Ruckert & Rothwell Suite 700, 1025 Thomas Jefferson Street N.W. Washington, D.C. 20007

Dear Mr. Dowd:

In compliance with an oral request I received on March 9, 1989, from Mr. Joseph E. Daly, Business Risks International, I made a comparison of the sample writings furnished by Danita Marcum and Paul Janszen with the entries on the questioned exhibits described herein to determine whether or not either of them wrote any of the entries in question. I have numbered the questioned sheets from 1 thru 25 with red ink for identification.

Questioned Exhibits

- Q-1 Three xerox sheets bearing questioned handprinted thru entries. They are dated Dec. 30, 4-9-87 and Q-3: 4-10-87, respectively.
- Q-4 Twenty-two xerox sheets bearing mostly handwritten thru entries but also a few handprinted letters. The Sheets are dated between 4-7 and 5-13. The entries on these sheets have been admitted by Paul Janszen as having been written by him, but I have considered them as questioned writings.

Known Writing and Printing

- K-1: Five sheets of paper bearing sample writing and printing furnished by Danita Marcum on March 8, 1989.
- K-2: Five sheets of paper bearing sample writing and printing furnished by Paul Janszen on March 8, 1989.

Results of the Comparisons

- a) I have reached the opinion that the entries on Exhibits Q-1 thru Q-3 were not written by Danita Marcum or Paul Janszen.
- b) I have reached the opinion that the first three entries on Exhibit Q-22 were written by Danita Marcum.

(Results cont'd)

c) The available handwriting evidence indicate it is probable all the entries on Exhibits Q-4 thru Q-25, with exception of the first three lines on Q-22, were written by Paul Janssen.

Remarks

A comparison of the questioned entries with the known writings of Danita Marcum and Paul Janszen has resulted in the conclusions listed herein.

Even though Paul Janszen has admitted writing the entries on Exhibits Q=4 thru Q=25 I have not been able to definitely identify him as the writer. The sample handwriting furnished by him was carefully and formally written and there is not complete agreement with the rapidly written entries in question. There is sufficient agreement, however, to indicate it is probable he wrote the entries on those sheets with the exception noted.

All the exhibits submitted are herewith.

Sincerely,

James R. Dibowski

Background and Experience of James R. Dibowski as an Examiner of Questioned Documents.

- 1. Twenty-seven years experience as an Examiner of Questioned Documents in the Postal Inspection Service Crime Laboratory in Cincinnati, Ohio. (1950 thru 1976)
- 2. From 1962 until his retirement at the end of 1976 he was Director of the Postal Crime Laboratory in Cincinnati.
- 3. From 1976 until the present he has been engaged in private practice as an Examiner of Questioned Documents.
- 4. He was trained under an apprenticeship program in the Cincinnati Crime Laboratory from 1947 thru 1949. This training included a study of procedures used in identifying handwriting, handprinting and typewriting, determining makes and models of typewriters from examination of typescripts, restoring eradicated, obliterated and charred documents to legibility, comparisons of inks and papers, and miscellaneous problems relating to documents.
- 5. He has handled over 10,000 document cases.
- 6. He examined about a quarter-million documents for the Fostal Inspection Service.
- 7. He has qualified and testified as an expert witness over 500 times in State and Federal Courts in twenty-two states.
- 8. He has trained five other persons as Examiners of Questioned Documents, one of whom succeeded him as Director of the Cincinnati Laboratory, and another became Assistant Director of the Postal Crime Laboratory in New York City.
- 9. He has lectured on Questioned Documents at Louisiana State University, Case-Western Reserve University, University of Georgia, and the University of Cincinnati.
- 10. He is a life member of the International Association for Identification, and is a Fellow in the American Academy of Forensic Sciences. He was Chairman of the Questioned Document Section of the former organization in 1965, and was on the membership committee of the latter group.
- 11. He has written articles on Questioned Documents which have been published.
- 12. On numerous occasions he has assisted other Federal Agencies with document problems, such as the Secret Service, Food and Drug Administration, F.B.I., Bureau of Narcotics, Alcohol, Tobacco Tax, and Firearms Division, Internal Revenue Service, Customs Office, the Army, Navy and Marines, and others.
- 13. During his career with the Postal Crime Laboratory and since that time he has on many occasions provided his services to various police departments and prosecutors in major cases.

- 14. He is qualified in the development, comparison and identification of finger and palm prints.
- 15. He received the highest award given by the United States Secret Service, the Director's Honor Award, for providing his expertise to that agency over a period of twenty-five years.
- 16. He received the "Man of the Year" award from the Chattanooga Division of the Postal Inspection Service for expert assistance rendered the Postal Inspectors in the States of Tennessee, Alabama and Mississippi for twenty-seven years.
- 17. Since his retirement from the Postal Inspectors' Crime Laboratory at the end of 1976 he has handled numerous civil and criminal matters in which documents were involved. Some of these are:

Medical malpractice
Vote frauds
Forged wills
Mailing of a bomb
Forged Deeds
Counterfeit drafts

Murder cases
Bank Embezzlements
Medicare fraud
Criminal Damaging
Spurious Promissory Notes
Forged checks

- 18. Since 1976 he has continued his cooperation with the Hamilton County Prosecuting Attorney and has assisted him in numerous cases.
- 19. In 1983 he provided expert assistance to the U. S. Attorneys in the Eastern District of Kentucky and the Southern District of Ohio.
- 20. Also, in 1983 he provided his expertise to the Presidential Task Force established recently to combat the influx of drugs into the United States. That case involved the laundering of \$10,000,000 of drug money at banks in the Covington, Kentucky area.
- 21. In 1982 he provided expert assistance to two attorneys in Miami, Florida, in the trial of a case which concluded with an award of over \$25,000,000 to one person, the highest amount ever granted to one individual in the State of Florida.
- 22. In 1984 he assisted the U.S. Attorney for the Southern District of Ohio in the successful prosecution of the head of a major drug smuggling operation. The defendant was charged with importing drugs worth \$42,000,000.
- 23. In June of 1985 he assisted the Hamilton County Prosecutor (Cincinnati) in the prosecution of serial killer Alton Coleman by relating Coleman to a handprinted message on a wall above the body of a teenage girl victim.
- 24. In the summer of 1987 he assisted the Hamilton County Prosecutor in the investigation of the murders (58) committed by serial killer Donald Harvey by relating his handprinting to a hidden list of some of his victims.
- .25. In the fall of 1988 he assisted the U.S. Attorney at Louisville in the successful prosecution of the national president of the Hells Angels Motorcycle Club who was charged, together with other Angels, with conspiracy to commit murder and the illegal interstate transportation of explosives.

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> Paul Janys 3-8-89 Page 3

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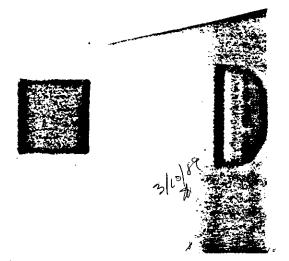
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