

1 Bryan James Blehm (023891)
2 **BLEHM LAW PLLC**
3 10869 N. Scottsdale Rd., 103-256
4 Phone: 602-753-6213
5 bryan@blehmlegal.com

6 **OLSEN LAW, P.C.**
7 Kurt Olsen, D.C. Bar No. 445279*
8 1250 Connecticut Ave., NW, Suite 700
9 Washington, DC 20036
10 (202) 408-7025
11 ko@olsenlawpc.com
12 *to be admitted pro hac vice

13 *Attorneys for Contestant-Plaintiff*

14 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
15 **IN AND FOR THE COUNTY OF MARICOPA**

16 Kari Lake,

17 Contestant/Plaintiff,

18 Case No. CV2022-095403

19 (Honorable Peter Thompson)

20 v.

21 Katie Hobbs, personally as Contestee and
22 in her official capacity as Secretary of
23 State; Stephen Richer in his official
24 capacity as Maricopa County Recorder;
25 Bill Gates, Clint Hickman, Jack Sellers,
26 Thomas Galvin, and Steve Gallardo, in
27 their official capacities as members of the
28 Maricopa County Board of Supervisors;
29 Scott Jarrett, in his official capacity as
30 Maricopa County Director of Elections;
31 and the Maricopa County Board of
32 Supervisors,

33 Defendants/Contestees.

34 **CONTESTANT/PLAINTIFF'S**
35 **EXPERT DISCLOSURE STATEMENT**

36 Pursuant to this Court's May 8, 2023, Scheduling Order, Contestant/Plaintiff, by
37 and through undersigned counsel, hereby submits her Expert Disclosure Statement.

38 1. Walter Daugherty
39 Daugherty Brothers, Inc.
40 c/o Kurt Olsen and Bryan Blehm

1 Blehm Law PLLC
10869 N. Scottsdale Rd., 103256
2 Scottsdale, AZ 85254
602-753-6213
3

4 Mr. Daughtery is a mathematician and statistician who may offer testimony
5 generally in the area of data sampling and related confidence intervals; software
6 functionality; computer system log files; and data processing. It is also expected that
7 Mr. Daughtery may comment on and respond to opinions and testimony offered by
8 Defendant's experts and fact witnesses. Mr. Daughtery's education, experience and
9 qualifications are set forth and described in the enclosed C.V. attached as Exhibit A.

10 2. Erich J. Speckin
11 Speckin Forensics, LLC
12 c/o Kurt Olsen and Bryan Blehm
13 Blehm Law PLLC
10869 N. Scottsdale Rd., 103256
14 Scottsdale, AZ 85254
602-753-6213

15 Mr. Speckin will offer testimony generally in the area of signature verification
16 processes and time study analysis of signature verification. It is also expected that Mr.
17 Specken will comment on and respond to opinions and testimony offered by Defendant's
18 experts and fact witnesses. Mr. Specken's education, experience and qualifications are
19 set forth and described in the enclosed C.V. attached as Exhibit B.

20 3. Wayne A. Barnes
21 Wayne Barnes Investigations
22 c/o Kurt Olsen and Bryan Blehm
23 Blehm Law PLLC
10869 N. Scottsdale Rd., 103256
24 Scottsdale, AZ 85254
602-753-6213

25 Mr. Barnes is a licensed private investigator who will offer testimony generally in
26 the area of signature verification. It is also expected that Mr. Barnes will comment on
27 and respond to opinions and testimony offered by Defendant's experts and fact
28

1 witnesses. Mr. Barnes' education, experience and qualifications are set forth and
2 described in the enclosed C.V. attached as Exhibit C.

3 RESPECTFULLY SUBMITTED this 11th day of May 2023.

4
5
6 /s/Bryan James Blehm
7 Bryan James Blehm
8 Blehm Law PLLC
9 (602) 752-6213
10 bryan@blehmlegal.com
11 *Attorneys for Plaintiff-Contestant*

12 ORIGINAL efiled and served via electronic
13 means this 11th day of May, 2023, upon:

14 Honorable Peter Thompson
15 Maricopa County Superior Court
16 c/o Sarah Umphress
17 sarah.umphress@jbazmc.maricopa.gov

18 Alexis E. Danneman
19 Austin Yost
20 Samantha J. Burke
21 Perkins Coie LLP
22 2901 North Central Avenue
23 Suite 2000
24 Phoenix, AZ 85012
25 adanneman@perkinscoie.com
26 ayost@perkinscoie.com
27 sburke@perkinscoie.com
28 *Attorneys for Defendant Katie Hobbs*

and

Abha Khanna*
ELIAS LAW GROUP LLP
1700 Seventh Avenue, Suite 2100
Seattle, WA 98101
akhanna@elias.law
Telephone: (206) 656-0177

1 and

2 Lalitha D. Madduri*
3 Christina Ford*
4 Elena A. Rodriguez Armenta*
5 ELIAS LAW GROUP LLP
6 250 Massachusetts Ave NW, Suite 400
7 Washington, D.C. 20001
8 lmadduri@elias.law
9 cford@elias.law
10 erodriguezarmenta@elias.law
11 *Attorneys for Defendant Katie Hobbs*

12 and

13 Craig A. Morgan
14 SHERMAN & HOWARD, LLC
15 201 East Washington Street, Suite 800
16 Phoenix, Arizona 85004
17 cmorgan@shermanhoward.com
18 *Attorney for Defendant Secretary of State Adrian Fontes*

19 and

20 Sambo Dul
21 STATES UNITED DEMOCRACY CENTER
22 8205 South Priest Drive, #10312
23 Tempe, Arizona 85284
24 bo@statesuniteddemocracycenter.org
25 *Attorney for Defendant Secretary of State Adrian Fontes*

26 and

27

28

1 Thomas P. Liddy
2 Joseph La Rue
3 Joseph Branco
4 Karen Hartman-Tellez
5 Jack L. O'Connor
6 Sean M. Moore
7 Rosa Aguilar
8 Maricopa County Attorney's Office
9 225 West Madison St.
10 Phoenix, AZ 85003
11 liddy@mcao.maricopa.gov
12 laruej@mcao.maricopa.gov
13 brancoj@mcao.maricopa.gov
14 hartmank@mcao.maricopa.gov
15 oconnorj@mcao.maricopa.gov
16 moores@mcao.maricopa.gov
17 aguilarr@mcao.maricopa.gov
18 *Attorneys for Maricopa County Defendants*

19 and

20 Emily Craiger
21 The Burgess Law Group
22 3131 East Camelback Road, Suite 224
23 Phoenix, Arizona 85016
24 emily@theburgesslawgroup.com
25 *Attorneys for Maricopa County Defendants*

26 */s/Bryan James Blehm*

27 Bryan James Blehm
28 Counsel for Plaintiff-Contestant Kari Lake

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EXHIBIT A

Curriculum Vitae of Walter C. Daugherty

Walter C. Daugherty
10895 Lakefront Drive
College Station, TX 77845
(979) 845-1308 (Office)
w-daugherty@tamu.edu

EDUCATION

Ed.D., Mathematical Education, Harvard University, Cambridge, Massachusetts, 1977. Dissertation: "On the Ordering of Topics in the Teaching of Mathematics." Advisor: Marc Lieberman.

M.A.T., Mathematics, Harvard University, Cambridge, Massachusetts, 1967 (age 20).

B.S., Mathematics, Oklahoma Christian College, Oklahoma City, Oklahoma, 1966 (3 years). Minors: Physics and chemistry, German.

EXPERIENCE

- 1973 to present Daugherty Brothers, Inc., (Computer consultants), Bethany, Oklahoma. Co-founder, chairman, and president. Clients include IBM Federal Systems Division, New York Times, Washington Post, Los Angeles Times, Cheyenne and Arapaho Tribes of Oklahoma, Southwestern Bell Telephone, Fulbright & Jaworski (Houston), Texas Department of Agriculture, Phonogram B.V. (Amsterdam), and U. S. Customs Service.
- 1987 to present Texas A & M University, College Station, Texas. Visiting Assistant Professor/Senior Lecturer/Senior Lecturer Emeritus, Departments of Computer Science and Engineering and Electrical and Computer Engineering, College of Engineering.
- 1989-91 Texas A & M University System, College Station, Texas. Director, Knowledge Systems Research Center, Computer Science Division of the Texas Engineering Experiment Station.

1984-87 Blinn College, Brenham, Texas. Computer science instructor. Part-time 1984-86, full-time 1986-87.

1978-80 Rose State College, Midwest City, Oklahoma. Data processing instructor (part-time).

1971-73 ECRM, Bedford, Massachusetts. Systems programmer.

1970-71 Harvard Computing Center, Cambridge, Massachusetts. Telecommunications specialist.

1969-70 Computer-Aided Instruction Laboratory, Harvard University, Cambridge, Massachusetts. Systems programmer.

1968-70 Harvard University, Division of Engineering and Applied Physics, Cambridge, Massachusetts. Teaching fellow (for George Mealy and Thomas Bartee).

1967 Driscoll Junior High School, Brookline, Massachusetts. Mathematics teacher.

1967 University of Oklahoma Medical Center Computing Facility, Oklahoma City, Oklahoma. Programmer.

1966 University of Central Oklahoma Data Processing Center, Edmond, Oklahoma. Programmer.

1965 Oklahoma Christian University of Science and Arts, Oklahoma City, Oklahoma. Statistical programmer.

1963 University of Oklahoma Computer Center, Norman, Oklahoma. Lab instructor.

RESEARCH AND DESIGN

1. Refereed Publications

Daughterity, W. C., and Kish, L. B., "More on the Reference-Grounding-Based Search in Noise-Based Logic," *Fluctuation and Noise Letters*, Vol. 21, No. 3, 2250023, 2022.

Kish, L. B., and Daughterity, W. C., "Entanglement, and Unsorted Database Search in Noise-Based Logic," *Applied Sciences*, Vol. 9, No. 15, 3029, 2019.

Kish, L. B., and Daugherty, W. C., "Noise-Based Logic Gates by Operations on the Reference System," *Fluctuation and Noise Letters*, Vol. 17, No. 4, 1850033, 2018.

Daugherty, W. C., and Coulson, R. N., "Knowledge Engineering for Sustainable Agriculture Management," *Proceedings of ICAST 2001 Conference* (Beijing, China, November 2001), 2:266, 2001.

Coulson, R. N., Saarenmaa, H., Daugherty, W. C., Rykiel, E. J., Saunders, M. C., and Fitzgerald, J. W., "A Knowledge System Environment for Ecosystem Management," book chapter in Klopatek, J. and Gardner, R. (eds.), *Landscape Ecological Analysis: Issues and Applications*, Springer-Verlag, 57-79, 1999.

Coulson, R. N., Daugherty, W. C., Rykiel, E. J., Saarenmaa, H., and Saunders, M. C., "The Pragmatism of Ecosystem Management: Planning, Problem Solving and Decision Making with Knowledge-Based Systems," *Proceedings of Eco-Infoma '96 Global Networks for Environmental Information Conference* (Lake Buena Vista, Florida, November 1996), 10:342-50, 1996.

Coulson, R. N., Fitzgerald, J. W.* , Daugherty, W. C., Oliveria, F. L., and Wunneburger, D. F., "Using Spatial Data for Integrated Pest Management in Forest Landscapes," *Proceedings of the 11th Conference on Geographic Information Systems: Integrating Spatial Information Technologies for Tomorrow* (Vancouver, British Columbia, Canada, 1997).

Daugherty, W. C.; Harris, C. E., Jr.; and Rabins, M. J., "Introducing Ethics and Professionalism in REU Programs," *Proceedings of the 1995 World Conference on Engineering Education* (Minneapolis, Minnesota, October 1995).

Coulson, R. N., Daugherty, W. C., Vidlak, M. D.* , Fitzgerald, J. W.* , Teh, S. H.* , Oliveria, F. L., Drummond, D. B., and Nettleton, W. A., "Computer-based Planning, Problem Solving, and Decision Making in Forest Health Management: An Implementation of the Knowledge System Environment for the Southern Pine Beetle, ISPBEX-II," *Proceedings of the IUFRO Symposium on Current Topics in Forest Entomology* (Maui, Hawaii), 1995.

Yen, J., Daugherty, W. C., Wang, H.* , and Rathakrishnan, B.* , "Self-Tuning and Self-Learning Fuzzy Systems," book chapter in Yen, J., Langari, R., and Zadeh, L. (eds.), *Industrial Applications of Fuzzy Logic and Intelligent Systems*, IEEE Press, 1995.

* Graduate Research Assistant I funded

Daugherty, W. C., Video review of *Introduction to Biological and Artificial Neural Networks for Pattern Recognition*, by Steven K. Rogers, in *IEEE Transactions on Neural Networks*, Vol. 5, No. 5, 1994.

Teh, S. H. *, Daugherty, W. C., and Coulson, R. N., "A User-Centric Methodology for Building Usable Expert Systems," *Proceedings of the 7th International Conference on Industrial and Engineering Applications of Artificial Intelligence and Expert Systems* (Austin, Texas, May-June 1994), 45-48, 1994.

Daugherty, W. C., "A Neural-Fuzzy System for the Protein Folding Problem," *Proceedings of the Third International Workshop on Industrial Fuzzy Control & Intelligent Systems (IFIS '93)* (Houston, Texas, December 1993), 47-49, 1993.

Daugherty, W. C., "A Partially Self-Training System for the Protein Folding Problem," *Proceedings of the World Congress on Neural Networks (WCNN '93)*, (Portland, Oregon, July 1993). Invited paper.

Yen, J., Wang, H. *, and Daugherty, W. C., "Design Issues of Reinforcement-Based Self-Learning Fuzzy Control," *Proceedings of the World Congress on Neural Networks (WCNN '93)*, (Portland, Oregon, July 1993).

Daugherty, W. C., "Characterizations of Fuzzy Operations," *Proceedings of the Second International Workshop on Industrial Fuzzy Control & Intelligent Systems* (College Station, Texas, December 1992), 234, 1992.

Yen, J., Wang, H. *, and Daugherty, W. C., "Design Issues of a Reinforcement-Based Self-Learning Fuzzy Controller for Petrochemical Process Control," *Proceedings of North American Fuzzy Information Processing Society* (Puerto Vallarta, December 1992), 1992.

Yen, J., Wang, H. *, and Daugherty, W. C., "An Adaptive Fuzzy Controller with Application to Petroleum Processing," *Proceedings of IFAC Workshop on Intelligent Manufacturing Systems* (Dearborn, October 1992), 1992.

Yen, J., Daugherty, W. C., and Rathakrishnan, B. *, "Fuzzy Logic and Its Application to Process Control," *Proceedings of CAPA Technology Conference* (Houston, May 1992), 78-86, 1992.

* Graduate Research Assistant I funded

Daugherty, W. C., Rathakrishnan, B. *, and Yen, J., "Performance Evaluation of a Self-Tuning Fuzzy Controller," *Proceedings of the IEEE International Conference on Fuzzy Systems (FUZZ-IEEE)* (San Diego, March 1992), 1992.

Daugherty, W. C., "An Application of Geometrical Reasoning to a Combinatorial Problem," *Proceedings of the Seventh Annual Conference on Applied Mathematics* (Edmond, Oklahoma, April 1991), pp. 226-232, 1991.

Daugherty, W. C., Review of *Data Communications Dictionary*, by Charles J. Sippl, in *Computing Reviews*, Vol. 17, No. 9, pp. 335-336, 1976.

Daugherty, W. C., "Circuits for Dial-up and Local Use of a Stand-alone PDP-8," *Proceedings of the Digital Equipment Computer Users Society*, Vol. 2, No. 2 (Los Angeles, December 1975), pp. 413-414, 1976.

Daugherty, W. C., Review of *Effective Use of ANS COBOL Computer Programming Language*, by Laurence S. Cohn, in *Computing Reviews*, Vol. 16, No. 10, p. 441, 1975.

Manwell, T., Daugherty, W., Desch, S., and Stolurow, L., "Tom Swift and His Electric Bilingual Grandmother," *ACM SIGCUE Bulletin*, Vol. 7, No. 1, pp. 5-17, 1973.

Daugherty, W. C., "A Telephone Amplifier," *Transactions of the Oklahoma Junior Academy of Science*, Vol. IV, pp. 130-132, 1961.

* Graduate Research Assistant I funded

2. Other Publications

Daugherty, W. C., "Honors Section," in Rabins, M. J., and Harris, C. E. Jr. (eds.), *Engineering Ethics Teaching Manual*, 1997.

Daugherty, W. C., "Honors Section," in Rabins, M. J., and Harris, C. E. Jr. (eds.), *Engineering Ethics Teaching Manual*, 1996.

Allen, G. D., Nelson, P., Jarvis, R. D., and Daugherty, W. C., "System Impact of Hit Assessment Capability for NPB Discrimination: Analysis of the Case of No-Hit Assessment," *Weapons Lab/TALN Technical Report*, Kirtland Air Force Base, May, 1990.

3. Other Conference Papers and Presentations

Coulson, R. N., and Daugherty, W. C., "A Knowledge Engineering Approach for Ecosystem Management," 11th Annual Landscape Ecology Symposium, International Association for Landscape Ecology - Integration of Cultural and Natural Ecosystems Across Landscapes: Applications of the Science, Galveston, Texas, 1996.

Coulson, R. N., and Daugherty, W. C., "Decision Support Systems for Forest Pests: Where Do All the Knowledge-Based Systems Go?," North American Forest Insect Work Conference, San Antonio, Texas, 1996.

Daugherty, W. C. and Coulson, R. N., SPBEBE (Economic and Environmental Impact Assessment for Southern Pine Beetle Suppression Projects), computer code, developed for the USDA Forest Service, Forest Health Protection, 1996-1997.

Coulson, R. N., and Daugherty, W. C., "Knowledge System Environment for Ecosystem Management," Global Studies Seminar, Battelle Pacific Northwest Laboratories, Richland, Washington, 1995.

Daugherty, W. C. and Coulson, R. N., ISPBEX-II (Integrated Southern Pine Beetle Expert System), computer code, developed for the USDA Forest Service, Forest Health Protection, 1994.

Daugherty, W. C., and Yen, J., "Tutorial on Neuro-Fuzzy Systems," Third International Workshop on Industrial Fuzzy Control & Intelligent Systems Houston, Texas, December 1993.

Daugherty, W. C., "Introduction to LISP with an On-line Demonstration," Houston Geotech '91, Houston, Texas, 1991.

Daugherty, W. C., "The Universal Classification Problem," South Central Regional Conference of the Association for Computing Machinery, Austin, Texas, 1984.

4. Research Projects

"Remote Laboratory Data Entry and Retrieval System," Texas Department of Agriculture, Walter C. Daugherty, 1986, \$3,000 (Daugherty 100%).

"Electrochemical Modeling of a Sinter Plate, Sealed Design Nickel-Cadmium (Ni-Cd) Battery Cell," National Aeronautics and Space Administration, Ralph E. White, Walter C. Daugherty, 1 graduate student, 1989, 25% of my salary 1989-90 (Daugherty 100%).

“Application of Reasoning under Uncertainty to Process Control,” Texaco, Walter C. Daugherty and John Yen, 1 graduate student; competitive and peer-reviewed, September 1990, \$18,000.

“Design of a Computational Classroom,” Texas A & M University, Walter C. Daugherty, September 1990-May 1991, \$60,000 (Daugherty 100%).

“Design of a Second Computational Classroom,” Texas A & M University, Walter C. Daugherty, January 1991-December 1992, \$153,000 (Daugherty 100%).

“Development of Honors Courses in Artificial Intelligence and Analysis of Algorithms,” Texas A & M University, Walter C. Daugherty, James Abello and Arkady Kanevsky, 2 graduate students, competitive, September 1991-May 1991, \$11,000 (Daugherty 50%).

“Integrated Southern Pine Beetle Expert System”; USDA Forest Service; Robert N. Coulson, Walter C. Daugherty, and Jeffrey W. Fitzgerald; 5 graduate students; competitive and peer-reviewed; 1985-1992, \$974,120.

“Distributed Data-Base Support for the ISPBE Expert System”; USDA Forest Service; Robert N. Coulson, Walter C. Daugherty, and Jeffrey W. Fitzgerald; 1 graduate student; competitive and peer-reviewed; 1992-93; \$35,000.

“Integrated Southern Pine Beetle Expert System II”; USDA Forest Service; Robert N. Coulson, Walter C. Daugherty, and Jeffrey W. Fitzgerald; competitive and peer-reviewed; March 1993-February 1994; competitive and peer-reviewed; \$170,000.

“Ecological Modelling of Regional Responses to Global Changes: A Knowledge System Environment for Planning, Problem-Solving and Decision Making”; Battelle Pacific Northwest Laboratory; Robert N. Coulson and Walter C. Daugherty; competitive and peer-reviewed; June-December 1995; \$39,996.

“Fitness of a Genetically Modified *Gliocladium virens* in Soil and Rhizosphere”; USDA Cooperative State Research Service; Charles M. Kenerley and Walter C. Daugherty; 1 senior associate, 2 graduate students, and 1 undergraduate student; competitive and peer-reviewed; September 1996-August 2001; \$254,450 (Daugherty 50%).

“Southern Pine Beetle Biological Evaluation and Economic Evaluation Program Conversion”; USDA Forest Service, Forest Health Protection; Robert N. Coulson (PI) and Walter C. Daugherty (Co-PI); competitive and peer-reviewed; 1996-1997; \$16,421.

“The Texas Imported Fire Ant Survey: The Fire Ant Spatial Information Management System (FASIMS)”; Texas Agricultural Experiment Station; Robert N. Coulson (PI) and S. Bradleigh Vinson, Maria D. Guzman, Douglas F. Wunneburger, and Walter C. Daugherty (Co-PI’s); competitive and peer-reviewed; January 1998-December 1998; \$50,000.

“Special Topics in Computer Science Concepts and Programming”; Academy for Advanced Telecommunications and Learning Technologies; Walter C. Daugherty; competitive and peer-reviewed; June 1998-May 1999; \$5,000 (Daugherty 100%).

“Object Modeling Techniques Support for National Simulation Center Tactical Directorate”; U. S. Army through prime contractor Cubic Applications, Inc.; Walter C. Daugherty, James A. Wall, and José Salinas; competitive; September 1998-April 1999; \$74,498 (Daugherty 20%).

“The Fire Ant Spatial Information Management System (FASIMS)”; Texas Department of Agriculture, Texas Imported Fire Ant Research and Management Plan; Robert N. Coulson (PI) and Douglas F. Wunneburger, S. Bradleigh Vinson, and Walter C. Daugherty (Co-PI’s); competitive and peer-reviewed; 1999-2001; \$220,000.

“Evaluating the Impact of Southern Pine Beetle on Ecologically Sustainable Forest Management”; USDA Forest Service; Robert N. Coulson and Walter C. Daugherty; 1 graduate student and 1 undergraduate student; competitive and peer-reviewed; 2000-2003, \$90,000.

“Honey Bee Initiative”; State of Texas; Robert N. Coulson (PI), Walter C. Daugherty (Consultant); 2 graduate students; competitive; September 2001-August 2002; \$40,000.

“Increasing Computer Science Retention by Developing and Deploying Self-Paced Learning Modules”; State of Texas; Jennifer Welch and Frank Shipman (Co-PI’s), Lawrence Petersen, Walter C. Daugherty, and Lauren Cifuentes (Key Personnel); 10 undergraduate students; competitive; June 2002-August 2004; \$422,692.

“Facilitating the Transition to Java in High School Computer Programming Classes”; Texas A&M University System Academy for Educator Development; Walter C. Daugherty; 1 graduate student; competitive and peer-reviewed; December 2003-September 2004; \$2,966 (Daugherty 100%).

“Instructional Technology Enhancements for Computer Teaching Labs,” Texas A&M University, Walter C. Daugherty, competitive, January 2004-August 2004, \$20,000 (Daugherty 100%).

“Increasing Computer Science Retention with Peer Teachers and Learning Modules”; State of Texas; Valerie Taylor and Jennifer Welch (Co-PI’s), Lawrence Petersen, Walter C. Daugherty, and Joseph Hurley (Key Personnel); undergraduate students; competitive; September 2004-August 2005; \$173,158.

Cumulative total: \$2,845,801

5. Research Proposals

Note: Funded proposals are listed in section 4 above.

“Automated Support for VLSI Standard Cell Optimization,” Texas Advanced Technology Program, Walter C. Daugherty, competitive and peer-reviewed, July 1989, not funded, \$233,887.

“Integration of Computer Software Models for NiCd Battery Design,” National Aeronautics and Space Administration, Ralph E. White and Walter C. Daugherty, competitive and peer-reviewed, 1990, not funded, \$125,000.

“Innovative Use of Supercomputers and Parallel Computers in Grades K-8,” Department of Energy, Paul Nelson, Walter C. Daugherty and Bahram Nassersharif, competitive and peer-reviewed, December 1990, preproposal submitted, \$885,000.

“Integration of Texas Junior Colleges into State and National Computer Networks,” Texas Advanced Technology Program, Walter C. Daugherty and Charles H. Beard, competitive and peer-reviewed, July 1991, not funded, \$174,219.

“Adaptive Fuzzy Control for Industrial Processes,” Texas Advanced Research Program, John Yen and Walter C. Daugherty, competitive and peer-reviewed, July 1991, not funded, \$177,064.

“Development of a Fuzzy Logic Tuner for a PID Controller,” Texaco, John Yen and Walter C. Daugherty, 1992-93, not funded, \$200,000.

“National Center For Ecological Analysis and Synthesis,” National Science Foundation; Robert N. Coulson, Walter C. Daugherty *et al.*, competitive and peer-reviewed, July 1994, not funded, \$10,000,000.

“Development of a Fungal Growth Model for Risk Assessment,” Texas Advanced Research Program, Charles M. Kenerley and Walter C. Daugherty, competitive and peer-reviewed, July 1995, not funded, \$203,792.

“Intelligent Vehicle Navigation System,” Texas Advanced Technology Program, Walter C. Daugherty and Jeffrey W. Fitzgerald, competitive and peer-reviewed, July 1995, not funded, \$195,058.

“Innovative Programs to Increase the Enrollment in Computer Science,” Texas Technology Workforce Development Grant Program, Valerie Taylor and Frank Shipman (co-PI's), Lawrence Petersen, Walter C. Daugherty, and Joseph Hurley (Key Personnel), competitive and peer-reviewed, March 2005, pending, \$69,760.

6. New Design Methods, Techniques, or Concepts Developed

Null Modem

I independently invented the null modem in 1969 and constructed one for Harvard University (which is still operational!).

Computer Keyboard National Standard

As a member of the Harvard-MIT Terminal Committee, I participated in the development of the national standard for computer keyboards (*e.g.*, putting braces above brackets for the benefit of programming languages). Nearly every computer terminal and keyboard since then (*e.g.*, VT100, PC) uses this layout.

Integrated User Training

I invented the method of training users about additional features of an application program by integrating the information with the operation of the program (see Manwell, Daugherty, *et al.* under Publications, above). This is now widely adopted, *e.g.*, by Microsoft for its Windows operating systems in the “Getting Started” panel.

Object-Oriented Database

I independently invented and implemented an object-oriented database to support arbitrary combinations of data types.

Self-Organizing Fuzzy Controller

In collaboration with Balaji Rathakrishnan (a Graduate Research Assistant I funded) and John Yen, I developed a new systematic methodology for constructing and tuning fuzzy logic controllers. The research project was funded by Texaco (see the preceding section for details) for use in its refineries.

TEACHING

1. New Courses Developed

CPSC 111/211/311 Java and C-based sequence - Member of curriculum subcommittee, taught 111 and 211

CPSC 210 (Honors) - Data Structures

CPSC 320 (Honors) - Artificial Intelligence

CPSC 489 - Object-Oriented Programming, Systems, and Languages

CPSC 635 - Natural Language Processing (taught by Dr. P. Mayer)

CPSC 689 - Symbolic and Algebraic Computation (not taught)

CSCE 489/PHIL 382 (with Glen Miller [PHIL]) - Ethics and Cybertechnology

ENGR/PHIL 482 (Honors) - Ethics and Engineering

PHIL 282 (with Glen Miller [PHIL]) – Ethics in a Digital Age

PHYS/ELEN 674 (with David Church [PHYS]) - Special Topics in

Quantum Computing (the first course at Texas A&M in quantum

computing, and, to the best of my knowledge, the first course in

quantum computing anywhere in Texas), taught Spring, 2005, for the

fifth time.

A Distance Learning section of CPSC 601 - Programming in C and Java, taught Spring, 2003.

Two sections of CPSC 111 - Computer Science Concepts and Programming taught with student peer teachers as assistants, Fall, 2002.

Honors section of CPSC 111 - Computer Science Concepts and Programming taught with student peer teachers as assistants, Fall, 2004.

Developed (with Lawrence Petersen) an intensive summer training program in Java and Software Engineering for high-school computer science teachers, taught Summer, 2003.

Developing an intensive summer training program in Data Structures for high-school computer science teachers, taught Summer, 2004; I was also completely responsible for recruiting teachers, getting them admitted, arranging for housing, and so on.

2. Courses Taught

A. Graduate

CPSC 601 Programming in C and Java

CPSC 602 Object-Oriented Programming, Development, and Software Engineering

CPSC 614 Computer

Architecture CPSC 625 Artificial

Intelligence CPSC 632 Expert
 Systems
 CPSC 681 Graduate Seminar
 CPSC 685 Problems
 CPSC 691 Research
 PHYS/ELEN 674 Quantum Computing (co-teacher)

B. Undergraduate

CPSC 111 Computer Science Concepts and Programming
 CPSC 111H Computer Science Concepts and Programming (Honors)
 CPSC 120 Programming II
 CPSC 120H Programming II (Honors)
 CPSC 203 Introduction to Computing
 CPSC 206 Structured Programming in C
 CPSC 210 Data Structures
 CPSC 210H Data Structures (Honors)
 CPSC 211 Data Structures and Implementations
 CPSC 211H Data Structures and Implementations (Honors)
 CPSC 285 Special Topics - Data Structures for Teachers
 CPSC 289 Special Topics - Java and Software Engineering for Teachers
 CPSC 311 Analysis of Algorithms
 CPSC 320/420 Artificial Intelligence
 CPSC 320H/420H Artificial Intelligence (Honors)
 CPSC 321 Computer Architecture
 CPSC 464 Integrated Systems Design Automation
 CPSC 485 Problems
 CPSC/ELEN 485H Problems (Honors theses)
 CPSC 489 Object-Oriented Programming, Systems, and Languages
 CSCE 113 Intermediate Programming and Design
 CSCE 121 Introduction to Program Design and Concepts
 CSCE 121H Introduction to Program Design and Concepts (Honors)
 CSCE 315 Programming Studio
 CSCE 410 Operating Systems
 CSCE 489 Cyberethics (co-teacher)
 ENGR 112 Foundations of Engineering II
 ENGR 112H Foundations of Engineering II (Honors)
 ENGR/PHIL 482H Ethics and Engineering (Honors)

PROFESSIONAL OUTREACH

1. Director, Knowledge Systems Research Center
2. Invited Significant Seminars or Lectures

Daughterity, W. C., "Computers and Privacy," Phi Theta Kappa Honor Society State Convention, Blinn College, Brenham, Texas, 1985.

Daughterity, W. C., and DeSoi, J. F., "Objected-Oriented Programming," Second Annual Texaco Artificial Intelligence Symposium, Houston, Texas, 1989.

Daughterity, W. C., "A Self-Tuning Fuzzy Controller," ARRI Conference on Fuzzy Logic, Arlington, Texas, March 1992.

Daughterity, W. C., Yen, J., and Langari, R., "Tutorial on Fuzzy Logic," Second International Workshop on Industrial Fuzzy Control & Intelligent Systems, College Station, Texas, December 1992.

Daughterity, W.C., "A Partially Self-Training System for the Protein Folding Problem," World Congress on Neural Networks, Portland, Oregon, July 1993.

Daughterity, W.C., "Neuro-fuzzy Systems," Third International Workshop on Industrial Fuzzy Control & Intelligent Systems, Houston, Texas, December 1993.

Daughterity, W.C. and Harris, C.E., "Ethics and Engineering," NSF Research Experience for Undergraduates, College Station, Texas, Summer 1994.

Daughterity, W.C. and Harris, C.E., "Ethics and Engineering," NSF Research Experience for Undergraduates, Austin, Texas, Summer 1994.

Daughterity, W.C. and Harris, C.E., "Ethics and Engineering," NSF Research Experience for Undergraduates, College Station, Texas, Summer 1995.

Daughterity, W.C. and Harris, C.E., "Ethics and Engineering," NSF Research Experience for Undergraduates, Austin, Texas, Summer 1995.

Daughterity, W.C., "Public-Key Cryptography Meets Quantum Computing: Why Secret Agencies are Quaking in their Boots." Quantum Computing Seminar, Texas A&M University, April 9, 2001.

Daughterity, W.C., "Quantum Computing 101: How to Crack RSA." DefCon X, Las Vegas, NV, August 4, 2002.

Daughterity, W.C., "Computer Ethics." ENGR 482 Ethics and Engineering, Texas A&M University, April 14-16, 2003.

Daughterity, W.C., "Incorporating Computer Ethics into an Engineering Ethics Course." University of Texas Ethics Conference, Austin, Texas, April 16, 2004.

Daughterity, W.C., "Computer Ethics." ENGR 482 Ethics and Engineering, Texas A&M University, November 8-10, 2004.

Daughterity, W.C., "[My] 53 Years of Computing History," CSCE 681 Open Graduate Seminar, Texas A&M University, November 18, 2015.

3. Consulting

St. Joseph's Hospital, Bryan, Fall 1990, at no charge.
Other clients include IBM Federal Systems Division, New York Times, Washington Post, Los Angeles Times, Cheyenne and Arapaho Tribes of Oklahoma, Southwestern Bell Telephone, Fulbright & Jaworski (Houston), Texas Department of Agriculture, Phonogram B.V. (Amsterdam), and U. S. Department of the Treasury.

HONORS AND AWARDS

Oklahoma Junior Academy of Science, elected to membership, 1961,
Oklahoma State University
National Science Foundation, Institute for High Ability Secondary
School Students, 1962, University of Oklahoma
Westinghouse, Science Talent Search national finalist,
1963 National Merit Scholarship test, highest score in
Oklahoma, 1963 Frontiers of Science, scholarship, 1963,
Oklahoma City, Oklahoma
Engineering Club of Oklahoma City, award, 1963, Oklahoma
City, Oklahoma Oklahoma Christian College, full scholarship (top
entering freshman), 1963,
Oklahoma City, Oklahoma
National Science Foundation, Undergraduate Research Participation
Program, 1965, University of Oklahoma, Norman, Oklahoma
Alpha Delta Tau, National Honor Society, 1966
Who's Who in American Colleges and
Universities, 1966 Graduate Record Exam in

Mathematics, scored 800, 1966 Harvard University, Prize Fellowship, 1966 National Science Foundation, Academic Year Institute, 1967 Phi Delta Kappa, National Honor Society, 1967
Harvard University, Class Marshal for the Graduate School of Education, 1967 Harvard University, Bowdoin Prize, bronze medal and cash award for outstanding writing, 1973
Association for Computing Machinery, selected as a reviewer for *Computing Reviews*, 1975
Association for Computing Machinery, Outstanding Regional Intercollegiate Programming Contest Director Award, 1993, Indianapolis, Indiana
World Congress on Neural Networks, Neural Systems Session Co-chair, 1993, Portland, Oregon
Graduate Student Council, 1997 Outstanding Graduate Faculty Award citation: "For your time and dedication to graduate students at Texas A&M."
Named by the TAMU System to The Academy for Educator Development, a major component of The Texas A&M University System's Regents' Initiative for Excellence in Education, 2003 (one of only two faculty members selected from the entire College of Engineering).
Winner, \$500 cash prize, Texas A&M University Academic Integrity Week Essay Competition (Faculty Category), 2004.
Texas A&M University, Department of Computer Science & Engineering, 2009 Undergraduate Faculty Award citation: "In grateful appreciation of dedicated service, exemplary attitude, and significant contribution."
Qualified for American MENSA, 2015.
Oklahoma Christian University, Department of Mathematics and Computer Science, 2015 Distinguished Alumnus Award citation: "For outstanding vision, dedication, and commitment to excellence."

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EXHIBIT B

Speckin Forensics, LLC

120 N. WASHINGTON SQUARE, SUITE 300
PMB 5068
LANSING, MICHIGAN 48823
517-349-3528 • FAX 517-349-5538

PLEASE DIRECT CORRESPONDENCE & PAYMENT HERE:
110 E. BROWARD BOULEVARD, SUITE 1700
FORT LAUDERDALE, FLORIDA 33301
954-763-6134 • FAX 954-688-4941

www.4N6.com

LEONARD A. SPECKIN
RETIRED DOCUMENT ANALYST

MICHAEL J. SINKE
RETIRED LATENT PRINT SPECIALIST
RETIRED CRIME SCENE RECONSTRUCTION
RETIRED FORENSIC DOCUMENT ANALYST

ROBERT D. KULLMAN
RETIRED FORENSIC DOCUMENT ANALYST

DR. GEORGE F. JACKSON Ph.D.
TOXICOLOGIST

ERICH J. SPECKIN
FORENSIC DOCUMENT ANALYST
INK DATING SPECIALIST

ROGER J. BOLHOUSE MBA
LABORATORY DIRECTOR
CRIME SCENE RECONSTRUCTION
FORENSIC ANALYST & CONSULTANT

THOMAS K. HUARD Ph.D.
DNA ANALYST & CONSULTANT

TERRY NADEAU
ARSON INVESTIGATOR

RICHARD L. BRUNELLE
RETIRED INK DATING CONSULTANT

DR. LAURENCE R. SIMSON M.D.
RETIRED FORENSIC PATHOLOGIST

ANTHONY A. MILONE
COMPUTER & GRAPHICS SPECIALIST

DR. JULIE HOWENSTINE
SEROLOGIST
DNA ANALYST & CONSULTANT
CRIME SCENE RECONSTRUCTION

Erich J. Speckin Forensic Document Analyst Ink Dating Specialist

Experience:

- Employed with Speckin Forensic Laboratories from 1993- Present
President from 1999 – Present

Education:

- Purdue University at age 15 to study engineering
- Albion College at age 17 to study biology and pre-medical
- Michigan State University graduated with a degree in Chemistry (1995)

Forensic Training:

- Two-year residency with Leonard A. Speckin in the examination of questioned Documents (1993-1995)
- One-year residency with Brunelle Forensic Laboratories in the identification and dating of inks (1995-1996)

Publications:

Fourteen scientific papers and publications authored or co-authored including:

1. Obverse-Reverse Intersection of Lines, 1993 Midwestern Association of Forensic Scientists and 1996 American Society of Questioned Document Examiners
2. Chemical Removal of Magic Marker on Photocopied Documents, 1995 American Society of Questioned Document Examiners
3. A Private Examiner's Response to Ink Age Determination, 1996 American Academy of Forensic Sciences
4. Interpretation of Data Obtained in Relative Ink Age Determination Testing, 1997 American Academy of Forensic Sciences
5. How Do Forensic Chemists Detect 'Record Tampering'?, 1995 Michigan Lawyer's Weekly, 1995 Virginia Lawyer's Weekly

Erich J. Speckin

6. Technical Report with Case Studies on the Accelerated Aging of Writing Inks, 1998 International Journal of Forensic Document Examination, 1999 Canadian Society of Forensic Science, 1999 GFS Hamburg, Germany
7. The Detection of Mastic on Plastic, 1996 Midwestern Association of Forensic Scientists, 1996 Southwestern Association of Forensic Document Examiners
8. More Forensic Solutions to Help Attorneys in Litigation, 1995 Michigan Lawyer's Weekly
9. Chapter in Encyclopedia of Crime & Punishment, 2001 Textbook
10. Ink Dating Examinations, 2000 NADE journal
11. Impression by Traced Forgery, 2001 American Society of Questioned Document Examiners (co-author)
12. Response to Criticism of Technique Use in Relative Ink Age Determination, 1999 American Academy of Forensic Sciences
13. The Dating of Writing Inks through 2-Phenoxyethanol Using Gas Chromatography-Mass Spectrometry: Advantages, Interpretation, and Limitations 2010, AFDE (co-author)
14. Can We Agree on Terminology Beyond Handwriting?, 2019, MAFS (Co-Author)

Invited Speaker:

Invited Speaker on the subject of forensic including the following groups and venues:

- Michigan State University
- Florida International University
- American Trial Lawyers Association
- International Association of Questioned Document Examiners
- Medical Legal Consultants
- National Association of Document Examiners
- Canadian Society of Forensic Sciences
- American Academy of Forensic Sciences
- American Society of Questioned Document Examiners
- Midwestern Association of Forensic Scientists
- Southwestern Association of Forensic Document Examiners
- Medical Defense Attorneys Meetings
- Wayne County Nursing Consultants
- Various Insurance and Private Investigators Associations
- Nevada State Bar Association
- Gesellschaft fur Forensische Schriftuntersuchung E.V. (GFS) in Hamburg, Germany

Erich J. Speckin

Court Testified:

Testified in cases in Federal Court, Circuit Court, District Court, Union Arbitrations, licensing matters, depositions, House of Representatives, and the State Board of Canvassers in Alaska, Alabama, Arizona, California, Colorado, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nevada, New Jersey, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Virginia, Washington D.C., Washington, West Virginia, and Wisconsin. Also, in Vancouver, British Columbia Canada; Eulex Court in EU; India, Germany, Netherlands, Monterrey, Mexico, London, England; Tokyo, Japan, Jamaica, and Hong Kong.

I have been appointed by judges in approximately thirty states, including Michigan, California, Kentucky, Maine, Florida and Australia to perform examinations at the request of the court.

I have also been retained by the Drug Enforcement Agency, various U.S. Attorney's Offices, Embassy of Uruguay, Florida Department of Law Enforcement, many county Prosecutors from Los Angeles to Michigan, Michigan Attorney General's Office, Department of Natural Resources, The State Board of Canvassers, Health Care Fraud Division, Federal Defenders Offices, National Labor Relations Board as well as many local, county, state, and federal offices.

My clients include General Motors, Ford Motor Company, Chrysler, Honda, many national banks, National Collegiate Athletic Association, National Basketball Association, National Hockey League Players Association, as well as many others.

I have performed examinations in over three thousand cases and presented sworn testimony in thirty-seven states and eleven other countries on several levels approximately four hundred times in total. I have worked cases from five continents and many countries. (separate list available upon request)

National Media Appearances:

- National Media Appearances including:
- Wall Street Journal (front page)
- America's Most Wanted
- The Learning Channel (Medical Detectives)
- Good Morning America
- Consulting and prop creation for CSI episodes on ink dating
- Forensic Files

Professional Affiliations:

- Society of Forensic Ink Analysts (Board of Directors & President) 1998-2008
- Midwestern Association of Forensic Sciences
- American Society of Testing and Materials

Erich J. Speckin

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EXHIBIT C

Wayne A. Barnes

85 NW 98th Terrace, Plantation, FL 33324

Cellphone: (786) 514-0900

Email: wayne.barnes.investigations@gmail.com

Websites: www.Barnes-Investigations.com, www.WayneBarnesWriting.com

Professional Experience:

Wayne Barnes Investigations, Licensed Private Investigator, Florida, 2000 – present

Conduct broad-based investigations and competitive intelligence operations for corporations, insurance and investigative companies, law firms, and individual clients in these countries:

Antigua	Bahamas	Belize	Dominican Republic	Greece
Ireland	Italy	Mexico	Panama	Romania
Spain	Tortola, BVI	Turkey	United Kingdom	USA

Investigations Regarding Signatures

- In 1977, initiated signature analysis on FBI Special Agent applications: 46-years.
- Conduct signature analysis, both for personality traits and to determine forgeries. The personality analyses have never been wrong.
- Conducted the definitive analysis of Hunter Biden's signature on the receipt from the Delaware computer store where he left his laptop. It was his signature.
- Have been deposed and testified regarding forged signatures. Cases primarily involve questioned signatures on Wills, Deeds, and Shares of Stock. My expertise has been used in many investigations with case-breaking results.
- Conducted signature analysis for forgeries with cases in FL, TX, PA,
- Conducted investigation regarding graffiti at a university and determined the tagger.
- On deep-dive background investigations, include signature analysis of the subject.
- Participated in the Orlando, FL, ballot review following the 2022 election.
- Have written a book on signatures, *The Signature Whisperer* (unpublished).
- Generally, signature analysis and comparisons are part of larger investigations.

Post-FBI Investigations

- Pivotal undercover role played recovering Monet and Renoir paintings worth \$7 million.
- Investigated several other art thefts—high and middle-range—and forgeries, worldwide.
- Healthcare fraud investigations re hospitals, labs, research institutions; Elderly abuse.
- Asset searches: using databases and on-street investigation to locate houses, cars, etc.
- Ted-X Talk given to the Florida Int'l Bankers Assn. on "Interviewing—The FBI Way," <https://www.youtube.com/watch?v=zQ3kXA6CZfg>, history of the Personnel Security Interview.
- Investigate credit card/identity theft, truck hijackings and cargo theft, endangered plant theft, and integrity/security breaches in national medical testing.
- Succeed w/difficult process serving—fugitive subpoenas—kidnapping/family abductions.
- Organize, supervise and investigate fraud in numerous business settings, including agricultural/flower, grocery chains, construction, cruise lines, homeowners' associations, and national educational testing services.
- Conduct internal investigations w/businesses to resolve theft and internal fraud issues.
- Conduct extensive background investigations on individuals in private industry to be

Wayne A. Barnes

named to high-level positions where they will be direct-reports to the president or CEO.

- Assist individuals in managing contentious relationships with spouses/significant others, who are narcissist-predators and ruining their lives, psychologically and financially.
- Specialize in in-depth interviews, personnel backgrounds, and profiling individuals.

Federal Bureau of Investigation, Special Agent, 1971 - 2000

- Assigned to Los Angeles, New York City, Washington, D.C., and San Diego, with temporary assignments in Miami and Tampa, and language school in Monterey, CA.

Foreign Counterintelligence and Counterterrorism, 1972 – 2000

- Initiated, organized, managed, and investigated very complex counterintelligence cases in Washington, D.C., San Diego, and on special assignments, around the U.S. and internationally against the Soviet Union and Eastern Bloc nations, with significant allotments of manpower and money.
- Recruited intelligence sources, ran double agents, organized espionage investigations, and had multiple assignments operating undercover nationwide and abroad.
- Coordinated extensively with Capitol Hill and key U.S. Government agencies.
- Had a significant role in the Robert Hanssen investigation, working undercover to recruit a Soviet who could identify Hanssen as our Unknown Subject (Graysuit).
- Senior member of Counterterrorism Squad in San Diego in the 1990s responsible for gathering intelligence on extra-U.S. organizations with hostile intentions toward the U.S.
- Made dozens of hour-plus presentations to thousands of individuals in the Development of Espionage and Counterintelligence Awareness (DECA) program for the benefit of defense contractors, US Government agencies, military units, and private organizations.
- The Washington Field Office Security Officer in 1986, interviewed incoming linguists, and developed the now government-wide used Personnel Security Interview (PSI).
- Was awarded numerous financial incentive awards and letters of commendation in every aspect of FBI investigations, as well as two Quality Service Increases (QSI).
- In November, 1989, was chosen as the Special Agent speaker to represent all FBI employees at the FBI Headquarters ceremony honoring agents who had fallen in the line of duty. With wide media coverage, also speaking from the dais were Attorney General Richard Thornburg and FBI Director William Sessions.

Healthcare Fraud, 1996 – 2000

- Initiated and managed complex healthcare fraud cases in San Diego for five years, including fraud by doctors, laboratories and durable medical equipment companies. This resulted in returning millions of fraudulently obtained dollars to the federal coffers from successful prosecutions and plea bargains.
- Had a significant role in the multi-agency San Diego Regional Healthcare Fraud Task Force.
- A member of the specialized Columbia/HCA Task Force in Tampa in 2000, personally uncovering an additional \$93 million in fraudulent activity.
- Assigned as a senior healthcare fraud specialist in Miami during the summer of 2000.
- Coordinated prosecution with Assistant U.S. Attorneys.

Judicial Background Inquiries, 1994 – 1996

- Conducted numerous background investigations of high-profile appointees requiring Top Secret, U.S. Government clearances.
- Supervised a team of eighteen FBI agents, conducting background investigations of numerous nominees to the federal bench in San Diego. This is the most rigorous background investigation the FBI conducts.

Wayne A. Barnes

Professional Associations:

- California Bar Association, 1996 – present, (Inactive).
- New Jersey Bar Association, 1971 – present, (Inactive).
- Licensed Private Investigator, Florida, (A 1700271), (C 2100126), 2000 - present

Education:

- Villanova University, School of Law, J.D., 1971.
- Pennsylvania State University, B.A., 1968.

Language Skills:

Fluent in Romanian, conversationally fluent in Spanish.

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Wayne Barnes's Expertise Re Investigations

The below points set out my past and present concerning various investigations:

- 29-years as a Special Agent in the FBI working every conceivable aspect of investigations, from International Espionage, Healthcare Fraud, comprehensive Judicial Background investigations, and dozens more.
- Regarding Judicial Backgrounds, for several years, while assigned to the FBI's San Diego Division, I ran a team of 18 agents whenever a federal judicial nomination was made for the Southern District of California. My part was personally interviewing the nominee, and organizing and issuing assignments for the agents to cover virtually every aspect of the nominee's life. We had 45 days to complete this task, essentially, turning over all the rocks in the stream of someone's life, and if there was any mud, to continue up the stream until either there was an issue that would knock the person out of contention, or, finding clear water, writing up the investigation with full details.
- In the Washington Field Office, and also in the San Diego Division, I participated as one of the street agents composing a three-agent panel interviewing all special agent applicants, who had made it nearly to the end of their application/background process.
- Developed the Personnel Security Interview (PSI) now used government wide, which pertains to an applicant/nominee's foreign-to-the-U.S. connections. This was especially used for applicants for the linguist position, whose entire lives were lived abroad, which could not otherwise be checked through the normal investigative process.
- Regarding the Personnel Security Interview, on 3/16/16, gave a Ted-X talk for the Florida International Bankers Association on the PSI as a comprehensive interviewing technique. See the talk, 13-minutes: <https://www.youtube.com/watch?v=zQ3kXA6CZfg>
- Since retiring in 2000, have investigated privately, conducting dozens of very comprehensive background investigations for all levels of employment.
- Designated as and "expert" as an "investigator" by a federal appellate judge in the Southern District of Ohio in 2008. The case was a very complex healthcare fraud with billions of dollars at issue, and the defense named me as an expert to explain various aspects of the case, with five years of FBI healthcare fraud investigations. In an *ex parte* matter, the judge agreed that, in spite of Daubert requirements, raised by the U.S. Attorney's Office, I was deemed to be an expert in the broad field of "investigations."
- Have a cottage industry in conducting the most comprehensive backgrounds when billionaires plan company takeovers, and need to learn about the senior executives of the company they are purchasing, President, Chairman, CEO, CFO, COO, CIOs. Some of the most egregious information has been learned, changing the nature of several deals.
- The deep-dive backgrounds include information from three sources: comprehensive proprietary database, financial information, and social media. The full report averages 25 pages and is the most thorough example of what a comprehensive background can be.
- Signature Analysis: for some cases, when requested, a signature analysis is conducted regarding the subject of the background investigation, which often reveals aspect of personalities that are relevant to the background investigation.
- Has written a book, *The Signature Whisperer*, (not published), that explains signature analysis and forged signatures, with several case studies.