Document Examination Consultants Inc.

Forensic Report

Document Examination Consultants Inc.

www.decinc.ca

November 5, 2008

Daigle & Hancock LLP Barristers and Solicitors 51 Village Centre Place Mississauga, Ontario L4Z 1V9

Attention: Ethan M. Rogers

FORENSIC REPORT

Our File No. 1951/08 Your File No. 6036

Re: Norval Morrisseau Paintings

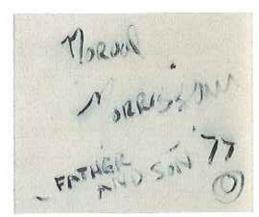
I am a Forensic Document Examiner and President of Document Examination Consultants Inc. A copy of my curriculum vitae is attached. Ethan Rogers, of Daigle & Hancock, retained me to determine whether or not Norval Morrisseau signed three paintings on the reverse side of the canvas. These paintings are described below, as are the samples against which the questioned signatures were compared. The questioned paintings were examined at Michael Moniz's residence on October 28th 2008. The specimen handwriting and signatures were provided by Joseph McLeod of the Maslak McLeod Gallery. Following the list of exhibits is a description of the methods employed, my observations, and the conclusions derived from the analysis. Copies of the signatures and illustrative charts are attached to this report.

Head Office: 389 Roosevelt Ave., Ottawa, Canada K2A 1Y9 Tel: (613) 722-7058 Fax: (613) 728-5568 Branch Office: 350 Palmerston Blvd., Toronto, Canada M6G 2N6 Tel: (416) 927-1453

List of Exhibits

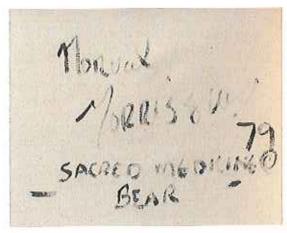
Questioned Documents

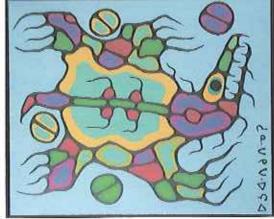
Q1: Painting titled, "Father and Son" bearing the inscription, "Norval Morrisseau, FATHER AND SON 77" on the reverse side.



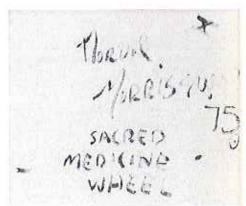


Q2: Painting titled, "Sacred Medicine Bear" bearing the inscription, "Norval Morrisseau, SACRED MEDICINE BEAR 79" on the reverse side.





Q3: Painting titled, "Sacred Medicine Wheel" bearing the inscription, "Norval Morrisseau, SACRED MEDICINE WHEEL 75" on the reverse side.





Specimen Documents - Bearing Handwriting/Printing and Signatures Purportedly Executed by Norval Morrisseau

K1: A two-page letter addressed, "Dear Sussana" and dated December 30 1968.

K2: An undated photocopy of a portion of a letter beginning with the words, "So I will close..."

K3: A letter addressed, "Dear Mrs. S. McLeod" and dated Jan. 15 1965.

K4: An autographed book entitled "The Art of Norval Morrisseau".

K5 (1-6): Six original signatures in a set of prints titled "The French Print".

K6-K13: Prints/paintings bearing original signatures written in pencil as described further below:

Doc. No.	Title		
K6	Children of Light and Sound		
K8	My Grandson and the Birds		
K10	Bear Spirit		
K12	We Are Gods Within Ourselves		

Doc. No.	Title		
K7	Fish and Loons of Lake Nipigon		
K9	Astral Children		
K11	Bird Speaks		
K13	Woodland Creatures		

Examinations Conducted

- Macroscopic analysis of the questioned and specimen signatures.
- 2. Comparison of the Q1-Q3 questioned signatures with the K1-K13 specimens.

Methods and Observations

- 1. The three questioned paintings bear inscriptions on the reverse side that are completed using a brush and paint; not a pen or pencil. It is apparent that for portions of the inscriptions very little paint has been applied to the canvas. This impacts on the assessment of the writing features, some of which have not been adequately inked to reveal their subtle structural characteristics. Furthermore, given the width of the brush and texture of the canvas, subtle writing features that would be present in pen or pencil signatures may be absent.
- The questioned signatures on Q1-Q3 were examined macroscopically. The analysis
 revealed that all are fluently written and show gradations in pressure. However, some
 structures are simplistic in design and may be incomplete depending on the amount
 of paint applied to the canvas.
 - A similar analysis of the K1-K13 specimen signatures and handwriting/printing disclosed fluent execution with gradations in pen pressure, tapered initial and terminal strokes and execution rhythm.
- None of the specimen signatures have been produced with a brush and paint, but rather are in pen or pencil. Therefore, these samples are not entirely satisfactory from a comparison standpoint.
 - A comparison was made between the questioned and specimen signatures see Chart 1 (a). This analysis involved an assessment of features including writing development and style; alignment; connecting strokes; degree of angularity and roundness within letterforms; initial and terminal movements; letter design; location of connections and disconnections; proportions; relative letter size; slope and spacing. A determination was made as to whether each characteristic found in the questioned signatures falls within the parameters of natural variation seen within the specimens. The comparison disclosed a significant combination of similarities in features fundamental to the signatures' structure and execution, along with some features that

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have not been totally accounted for. Examples of specific similarities and the features not fully accounted for are illustrated in Chart 1 (b-d).

Conclusion

 In my opinion there is strong support for the view that the author of the K1-K13 specimen material wrote the questioned signatures on Q1-Q3.

Comments

- The absence of specimen signatures executed with a brush and paint has limited the scope of this examination. It is recommended that additional specimens be provided that have been executed using the same materials as were used to produce the questioned signatures.
- Although the inscriptions on the questioned paintings bear names and a date, these
 have not been examined due to a lack of sufficient comparable specimen material
 executed in uppercase printed form.

Attachments to Report

- 1. Curriculum Vitae.
- 2. Illustrative Chart 1 (a-d).
- 3. Opinion Scale.
- 4. Copies of the signatures and handwriting/printing examined.

Prepared by:

Brian Lindblom, B.A., FSSocDip, D-ABFDE

Forensic Document Examiner

Curriculum Vitae

CURRICULUM VITAE

BRIAN LINDBLOM

Forensic Document Examiner

DOCUMENT EXAMINATION CONSULTANTS INC.

(613) 722-7058 - Ottawa (416) 927-1453 - Toronto Email: lindblom@on.aibn.com

ACADEMIC BACKGROUND - University of Manitoba, B.A., 1979

EMPLOYMENT - Document Examination Consultants Inc: November 1987 to the present.

 Royal Canadian Mounted Police Central Forensic Laboratory (Ottawa): June 1980 to November 1987.

FORENSIC TRAINING - Understudy Program in Document Examination at the R.C.M.P. Central Forensic Laboratory commenced in June 1980 and completed in December 1981. This program included modules on such subjects as: methods and systems of handwriting, principles and philosophy of handwriting comparisons, characteristics of traced, simulated and disguised writing, mechanical and electronic office machine [i.e. checkwriters, photocopiers, typewriters, printers (laser, inkjet, dot matrix), etc.] examinations and comparisons, restoration and decipherment of indented impressions and damaged documents, examinations of altered, eradicated and indented writing, ink and paper analysis, physical matching techniques.

Understudy Program in Graphic Arts was completed at the R.C.M.P. Central Forensic Laboratory in 1985. This program of study included modules on such subjects as: paper manufacture, photography, printing processes, production and issuance of genuine security documents, methods of producing counterfeits, principles and methodology employed in examining counterfeits.

Each program included reading assignments, study tours, essays, practical exercises, oral presentations and written examinations. Practical training included the completion of more than ninety cases, all of which were reviewed by senior examiners.

A Diploma in Forensic Document Examination (FSSocDip) was awarded by the Forensic Science Society of England in September 1986.

Certification as a Forensic Document Examiner was awarded in October 1990 by the American Board of Forensic Document Examiners (ABFDE) after completion of Board examinations. Elected to the Board of Directors in July 1995, serving until 1998. Member of testing committee for certification until July 1998. Re-elected to the Board of Directors in December 2003. Served on the continuing education and testing committees until August 2005. The ABFDE is the only certifying body in North America that is sponsored by the Canadian Society of Forensic Science, American Society of Questioned Document Examiners, South-Western Association of Forensic Document Examiners, and the South-Eastern Association of Forensic Document Examiners. It is also recognized by the American Academy of Forensic Sciences, the International Association for Identification and the Mid-Atlantic Association of Forensic Sciences.

CONTINUING EDUCATION - Have attended workshops and seminars on a variety of forensic subjects including; paper analysis, complex signature cases, facsimile machines, advanced infrared examinations, digital image enhancement, physiology of writing, providing expert testimony and technical writing. These sessions were sponsored either by the Canadian Society of Forensic Science, The American Society of Questioned Document Examiners or The American Board of Forensic Document Examiners.

PROFESSIONAL MEMBERSHIP

- Canadian Society of Forensic Science (1983 present)
- American Society of Questioned Document Examiners (1983 present). Advancement to Full Membership achieved in 1989, following completion of examinations. Member of: Evaluation and Examinations Committee, September 1995 - December 1996; Journal Committee, January 1995 - August 1997
- The American Academy of Forensic Sciences (1996 present).

EXPERIENCE

Several thousand documents have been examined respecting questioned handwriting, typewriting, inks, paper, photocopy manipulation, facsimile copies, computer-generated documents, stamp impressions, alterations, counterfeit and altered negotiable instruments and travel documents. The cases were completed for clients in Canada, U.S.A., England, Australia, Namibia, Hong Kong and the Caribbean.

Casework has been completed for: law firms, accounting firms, unions, insurance companies, municipal governments, banks, private and Crown corporations, police departments, school boards, as well as regulatory bodies including: Certified Management Accountants of Ontario, The Professional Association of Engineers of Ontario, The Law Society of Upper Canada, The Law Society of Manitoba, The College of Physicians and Surgeons of Ontario, The College of Physicians and Surgeons of Manitoba, The College of Physicians and Surgeons of Manitoba, The College of Audiologists & Speech-Language Pathologists of Ontario, The College of Physiotherapists of Ontario, College of Chiropodists of Ontario, College of Occupational Therapists of Ontario, The College of Psychologists of Ontario, The College of Nurses of Ontario and The Canadian Medical Protective Association.

Expert evidence has been given at civil and criminal trials, employment arbitration's, immigration hearings, and before licensing boards. Testimony has been presented in British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Quebec, New Brunswick, Nova Scotia, Newfoundland, in Trinidad & Tobago, and in the states of Florida and Illinois.

CONSULTING SERVICES

While employed at the Central Forensic Laboratory, provided assistance with, and recommendations for, the development of security features in Canadian negotiable documents and passports. As a private examiner have designed and evaluated negotiable instruments, driver's licenses and immigration documents for Crown and private corporations.

TEACHING

Training programs were developed for the examination of travel documents. Trainees' assignments and casework were monitored. Programs for the screening of suspect documents were designed and presented to police officers, immigration inspectors, visa officers and customs officials in Canada and the U.S.A.. Lectures have been given in the forensic science courses at the University of Ottawa Law School and at the University of Toronto. Workshops and lectures have been provided to the American Society of Industrial Security, the Canadian Institute, the Council of Private Investigators of Ontario, Federated Press programs on workplace investigations, and the American Board of Forensic Document Examiners.

AWARDS

Recipient of the 2008 Ordway Hilton Award presented by the Questioned Documents Section of the American Academy of Forensic Sciences.

Recipient of the 2007 American Board of Forensic Document Examiners New Horizon Award for publication of Scientific Examination of Questioned Documents – Second Edition. The award recognizes significant contributions to the forensic document examination field through research.

PUBLICATIONS AND PRESENTATIONS

- Write-On2 Document Comparison Software (workshop)
 ASODE Conference (Asheville) August 2008
- Fax Font Project V TTI Database 2008 Update ASQDE Conference (Asheville) August 2008
- The Application of Write-On Document Comparison Software to Complex Handwriting Comparisons
 AAFS Conference (Washington, DC) February 2008
- Examining Documents Requiring a Multi-Faceted Approach (workshop)
 MAFS Conference (Traverse City) September 2007
- Fax Font Project IV TTI Database 2006 Update ASQDE Conference (Portland) August 2006

- Scientific Examination of Questioned Documents, 2nd Edition Co-Editor and a Principal Author, CRC Press 2006
- The Examination of Facsimile Reproductions (workshop)
 ABFDE Conference (Las Vegas) October 2004
- Multi-faceted Examinations (workshop)
 ABFDE Conference (Las Vegas) October 2004
- Examination of Photocopied Signatures: Distinguishing Between Line Quality and Ink Line Morphology (workshop)
 SAFDE Conference (Atlanta) April 2004
- Graphics Software as an Aid to Establishing Stroke Order in Complex Signatures ASQDE Conference (Memphis) August 2004
 SAFDE Conference (Atlanta) April 2004
- Photocopied Handwriting and Signatures (Panel Discussion) Moderator/Presenter
 AAFS Conference (Chicago) February 2003
- The Document Examiner's Role in Deciphering Handwriting of a Severely Impaired Writer AAFS Conference (Chicago) February 2003
 MAFS Conference (Milwaukee) September 2002
- Practical Problems in the Relative Dating of Inks ASQDE Conference (San Diego) August 2002 MAFS Conference (Minneapolis) September 2001
- A Case Study Illustrating Detection of Digital Manipulation ASQDE Conference (Ottawa) August 2000
- Tracking of Sourced Impressions
 ASODE Conference (Ottawa) August 2000
- Enlargement and Reduction Characteristics of Facsimile Transmission Copies ASQDE/IAFS Conference (Los Angeles) August 1999
 Journal of the American Society of Questioned Document Examiners, June 2003. Vol. 6, No. 1
- Write-On 1.0 Using Pikaso Software to Aid in the Comparison of Handwriting ASQDE/IAFS Conference (Los Angeles) August 1999
- The Litigator's Guide to Expert Witnesses
 Document Examination Chapter, Canada Law Book Inc, 1997
- An Evaluation of Line Quality in Photocopied Signatures
 ASQDE 54th Annual Conference (Washington, DC) August 1996
 Science and Justice, Journal of the Forensic Science Society, 1998
- A Collection of Fax Fonts, Part II
 ASQDE 53rd Annual Conference (Chicago, IL) September 1995
- The Role of Forensic Document Examination Where Issues of Authenticity Arise in Estate Matters Factual Disputes in Estate Matters, The Canadian Institute, March 1994, Section 2
- Facsimile Header (TTI) Examinations
 ASQDE 52nd Annual Conference (Long Beach, CA) August 1994
- The Application of Forensic Document Examination in Estate and Trust Disputes Estates and Trusts Journal, September 1994. Vol. 14, No. 1.
 Reproduced in Will Power, CCH Canada, 1995
- Forensic Evidence in Canada
 Document Examination Chapter, Canada Law Book Inc, 1991

- The Examiner as Forensic Consultant and Expert Witness Professional and Ethical Considerations ASQDE 49th Annual Conference (Lake Buena Vista, FL) August 1991 Canadian Society of Forensic Science, Annual Conference (Montreal, Quebec) September 1991
- An Unusual Tracing Method
 Canadian Society of Forensic Science Annual Conference, 1990

 ASQDE 47th Annual Conference (Washington, DC) August 1989
- Fraud Prevention Measures
 Canadian Security, Feb/Mar 1990
- The Forensic Examination of Last Wills and Testaments Estates and Trusts Journal, August 1989. Vol. 9, No. 3.
- Current Trends in the Alteration and Counterfeiting of Travel Documents Canadian Society of Forensic Science and IAFS 11th Triennial Conference (Vancouver, BC) 1987
- The Alteration of Laminated Canadian Citizenship Cards
 ASQDE 43rd and Canadian Society of Forensic Science joint Annual Conference (Montreal, Quebec) 1985
- Stripper Plate Markings An Individual Characteristic in Chequewriter Impression Examinations
 Canadian Society of Forensic Science Journal, 1984. Vol. 17, No. 3.
 International Association of Forensic Science, Conference (Oxford, England) 1984
- Printing Characteristics of the Perm-a-Rite Mark II Label Tape Marker
 Canadian Society of Forensic Science Journal, 1984. Vol. 17, No. 4.
 International Association of Forensic Science, Conference (Oxford, England) 1984. (Poster Presentation)
- Identifying Characteristics in the Handwriting of the Visually Impaired Canadian Society of Forensic Science Journal, 1983. Vol.16, No. 4. ASQDE 41st Annual Conference (Lake Tahoe, Nevada) 1983.

Illustrative Charts

Questioned

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Q1 - Father and Son

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Q2 - Sacred Medicine Bear

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Q3 - Sacred Medicine Wheel

Specimens

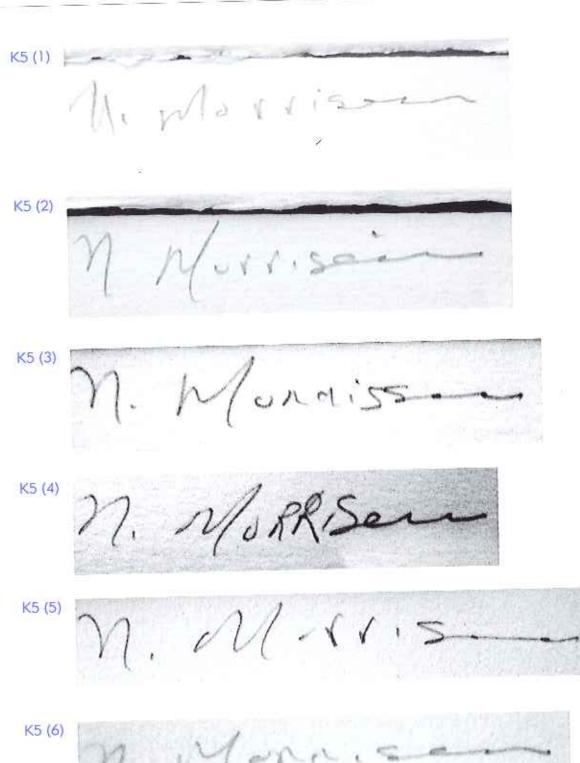
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Specimens



Specimens

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K6 - Children of Light and Sound

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K7 - Fish and Loons of Lake Nipigon

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K8 - My Grandson and the Birds

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K9 - Astral Children

K10 - Bear Spirit

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K11 - Bird Speaks

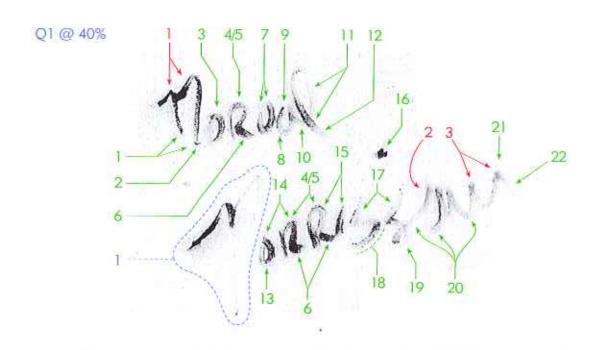
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K12 - We Are Gods Within Ourselves

n Marrisen

K13 - Woodland Creatures

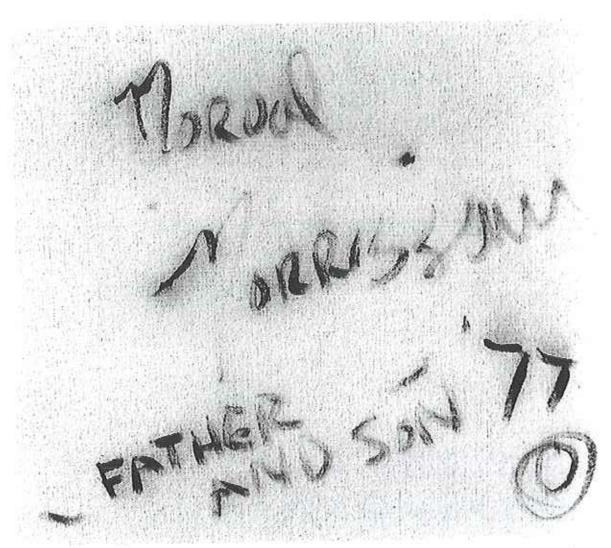
Chart 1 (b) Specific Examples from the Q1 Signature Comparison



Legend: Similarities are shown in green; features not fully accounted for in red; and areas that could not be assessed in blue.

- 1. Relative length of the legs on the N
- 2. hooking to the right to conclude the N
- 3. the shape of the O
- 4. the use of uppercase, printed-style \mathcal{R}' s
- 5. the shape of the R bulbs
- 6. the angle of the \mathcal{R} legs
- 7. the right shoulder of the V is taller than the left
- 8. there is no upstroke into the lpha
- 9. general shape of the a oval
- 10. the ω and v are the only connected letters in the given name
- 11. large loop in the $oldsymbol{\mathcal{U}}$ with a low intersecting point
- 12. length and direction of the $oldsymbol{\mathcal{U}}$ terminal strake
- 13. shape of the narrow O-
- 14. small σ relative to the size of the RR that follows
- 15. small $\acute{
 u}$ relative to the size of the \mathcal{R} 's that precede it
- 16. position of the $\dot{\nu}$ dot
- 17. slope of upper strokes in the S's
- 18. extended base of the S
- 19. the second S includes an eyelet at the base
- 20. the Seaw are the only connected letters in the surname
- 21. angular, tented movement in the terminal structure
- 22. direction of the final descender
 - 1. two-stroke N design
 - 2. orientation of the eyelet that follows the S
 - 3. taller shoulders on the w
 - 1. unclear cannot be assessed.

Q1 - Father and Son

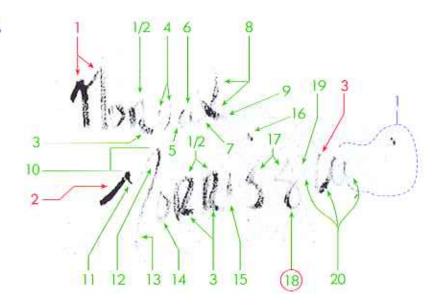


Approx. 50% of actual size



Chart 1 (c) Specific Examples from the Q2 Signature Comparison

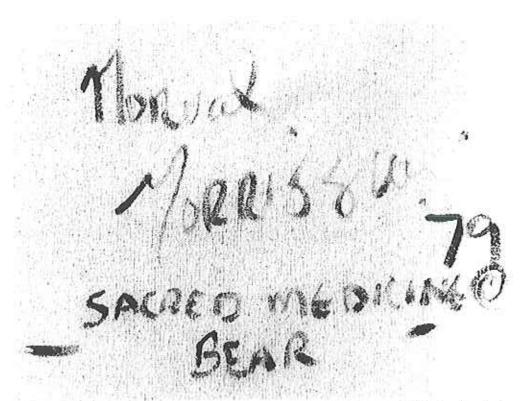
Q2 @ 40%



Legend: Similarities are shown in green; features not fully accounted for in red; and areas that could not be assessed in blue.

- 1. The use of uppercase, printed-style \mathcal{R}' s
- 2. the shape and size of the ${\cal R}$ bulbs
- 3. the angle of the ${\cal R}$ legs
- 4, the right shoulder of the V is taller than the left
- 5. there is no upstroke into the a
- 6. general shape of the lpha oval
- 7. the lpha and b are the only connected letters in the given name
- 8. large loop in the u with a low intersecting point
- 9. length and direction of the $oldsymbol{b}$ terminal stroke
- 10. relative heights of the M arches
- 11. short centre in the M
- 12. the shape of the second March
- 13. length of the M descender
- 14. size and proportions of the O
- 15. small $\dot{\nu}$ relative to the size of the ${\cal R}$ and ${\cal S}$ that surround it
- 16. position of the $\hat{\nu}$ dot
- 17. slope of upper strokes in the S's
- 18. the second \hat{S} includes an eyelet at the base, though the orientation is more vertical
- 19. movement from the S to the &
- 20. the Seaw are the only connected letters in the surname
 - 1. two-stroke N design
 - 2. no staff (downstroke) to begin the M
 - 3. tented movement to represent the @
 - 1. unclear cannot be assessed.

Q2 - Sacred Medicine Bear



Approx. 50% of actual size

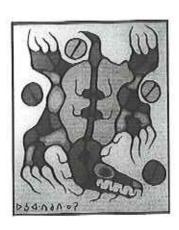
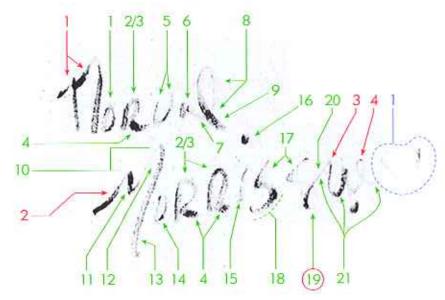


Chart 1 (d) Specific Examples from the Q3 Signature Comparison

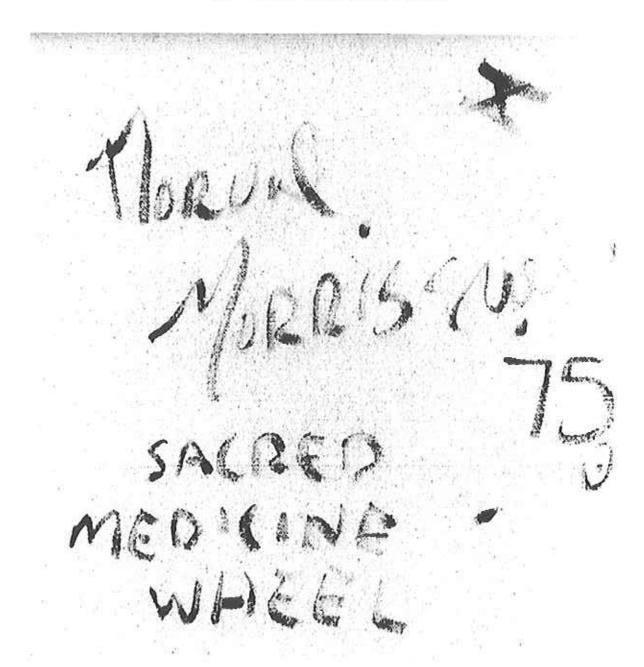




Legend: Similarities are shown in green; features not fully accounted for in red; and areas that could not be assessed in blue.

- 1. Size and shape of the O body
- 2. the use of uppercase, printed-style \mathcal{R}' s
- 3. the shape and size of the ${\cal R}$ bulbs
- 4. the angle of the ${\cal R}$ legs
- 5. the right shoulder of the V is taller than the left
- 6. narrow, open a oval
- 7. the lpha and b are the only connected letters in the given name
- 8. large loop in the ν with a low intersecting point
- 9. length and direction of the $ar{l}$ terminal stroke
- 10. relative heights of the Marches
- 11. short centre in the M
- 12. the shape of the second M arch
- 13. length of the M descender
- 14. size and proportions of the O
- 15. small $\dot{\nu}$ relative to the size of the ${\cal R}$ and ${\cal S}$ that surround it
- 16. position of the $\hat{
 u}$ dot
- 17. slope of upper strokes in the S's
- 18. extended base of the S
- 19. the second ${\cal S}$ includes an eyelet at the base, though the orientation is more vertical
- 20, movement from the S to the e
- 21. the seaw are the only connected letters in the surname
 - 1. angular, two-stroke N design
- 2. no staff (downstroke) to begin the M
- 3. tented movement to represent the e
- location of eyelet
- 1. unclear cannot be assessed.

Q3 - Sacred Medicine Wheel



Approx. 50% of actual size



Opinion Scale

OPINION SCALE

Strongest	a)	There is <u>conclusive evidence</u> that the author of the specimen material <u>wrote/did not write</u> the questioned document(s). The possibility that an alternative hypothesis is true can, in practice, be excluded.		
L E V	b)	There is <u>very strong support</u> for the view that the author of the specimen material <u>wrote/did not write</u> the questioned document(s).		
E L		The possibility that an alternative hypothesis is true is considered to be very unlikely.		
O F	c)	There is <u>strong support</u> for the view that the author of the specimen material <u>wrote/did not write</u> the questioned document(s).		
C E		The possibility that an alternative hypothesis is true is considered to be unlikely.		
R T A I N T	d)	There is moderate support for the view that the author of the specimen material wrote/did not write the questioned document(s).		
		There is more support for the advanced hypothesis than the alternative hypothesis.		
50 MeV	e)	<u>Unable to determine</u> whether or not the writer of the specimen material wrote the questioned document(s).		
Weakest		It is not possible to determine whether the advanced hypothesis or an alternative hypothesis is true.		

Photocopies

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Deux Sussana I got ace your Mail but I heft them unandswered also I Just got back with my family after being away for Six months and my wife HARRiet tell's me that the ART Supply's are here stoked with a missicalary place but the Party is away until after New years I want start Painting until after New years for you and Montreal and Torunto Gallery. I don't have to burded you with my Personwell Proplem's of the Six months Silince but Muy 1 Say this Much 1 am Now in the Stage where I Took a good Look inside of my self

and SAW a Spark- and By Studying it it burst into a flame which will Posse's me from all my Contacts of Life etc etc, I found "Nirvana" and South Searching him for six month's have found Nirvana Next within myself, my family is doing well and one months old -

Please give me your Cornect

Address
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So I will close. Trust to hear from you Regards to the final or part payment of the Art.

Thank you -

Mor Val Meri iscan

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Red Luke out

Dear Mrs , Mcleod,

Many thanks for used Clothing was put into Some use, I Regret to tell you I am Sonny I was not able to keply Sooner but I was not Keeped So busy for the past 3 months, wice there a Show at toresto-Jan 17 tice feb?, was at SAndy Lake for awhile but was not there us Originally planned-However if you Should write, write, to Red have ont I am Some. another two months / wice be able to finish work I have out hime for myselfs we are one doing fine -and I am Extending my warmest Regards to your Publicy your self. I thouk you

Sous Friend

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Specimens - Maslak McLeod Gallery

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Specimens - Maslak McLeod Gallery

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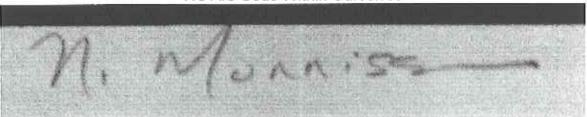
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Bird Speaks

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Specimens - Maslak McLeod Gallery

We Are Gods Within Ourselves



Woodland Creatures

