**UNITED STATES DISTRICT COURT**

**FOR THE WESTERN DISTRICT OF VIRGINIA**

**AT MIDDLE COUNTY**

*ELECTRONICALLY FILED*

The State of Virginia )

)

)

PLAINTIFF

)CASE NO. 1:23-AB-123-ABC

*v.* )

)

)

Bad Crew, et al.

)

DEFENDANTS )

)

)

\* \* \* \* \*

**Expert Report Noah James**

**Acquisitions Incorporated**

**May 7, 2024**

1. **Introduction**

* 1. The County of Chesapeake for the State of Virginia retained ACQUISITIONS INCORPORATED. and me for the purpose of analyzing reports and digital records, reviewing the facts and circumstances surrounding the events of a digital signature supposedly signed by the pope on January 1st 2000.

* 1. In particular, I was asked to analyze a file called “Final Final Version” and data relating to facts that may relate to the supposed signature of the pope John Paul II on or around, January 1st 2000.

* 1. Based on my experience and the technical analysis I performed, I have formed the following opinions:

* + 1. The Pope John Paul II did not sign this document.
    2. The signature was pasted there.
    3. The timestamps of the .PDF file do not add up and show deliberate modification of the file, meaning it is forged.

* 1. I was retained by County of Chesapeake for the State of Virgina for the purpose of providing expert testimony in the matter of Chesapeake *County* *, vs. Bad Guys, et al. Defendants.*

* 1. My opinions are based on work conducted by me. None of my opinions are intended to provide legal opinions. Thus far, I have expended about 5 hours in preparing this report. My compensation is in no way tied to the opinions I am offering or the outcome of this case.

* 1. This report is based on the information available to me as of the date of this report. I presume the data provided to me is accurate. I may revise, supplement, or expand my opinions prior to trial, if necessary and allowed, based on further review and analysis of information and opinions provided to me subsequent to the filing of this report.

* 1. In undertaking my analysis, I have considered information from a variety of sources, each of which is a type that is reasonably relied upon by experts in my field. A full list of the material I relied upon to prepare this report are shown in Appendix A. I have also relied upon my professional judgement and expertise, gathered in many years of performing digital forensics and cyber investigations.

1. **Background and Experience**

* 1. My background is further described in my curriculum vitae (CV) which is attached hereto as Appendix C and includes a short description of articles I have written.

# Discussion and Analysis

* 1. As seen in Exhibit A, the pdf file has had an image pasted onto it as the “signature” is selectable making it an external image that can be manipulated.

* 1. Furthermore, Exhibit B shows the properties as shown in the nitro software when selecting the signature which is clearly different from the properties tab displayed in Exhibit C when selecting the backdrop of the document.
  2. Exhibit D shows the timestamps of date modified before the date created timestamp resulting in a high probability of tampering with timestamps.
  3. Exhibit E shows the metadata timestamps where the date create and date modified are the same number (unlike Exhibit D) meaning someone did in fact change the timestamp data.

# Conclusions

1. My assessment, based on the facts and circumstances, but also by my technical forensic examination, supports the conclusions that the Pope John Paul II did not sign this document and that the digital timestamps and signatures were forged.
2. Information about this conclusion can be viewed in Exhibits A-E.

**Appendix A**

* <https://en.wikipedia.org/wiki/UTC−04:00#:~:text=UTC−04%3A00%20is%20an,UTC%20of%20−04%3A00.&text=Time%20in%20Brazil%2C%20since%2025%20April%202019.&text=It%20is%20observed%20in%20the,time%2C%20as%20Eastern%20Daylight%20Time>.
  + Used to determine what time zone the timestamp in Exhibit E was.
* <https://www.gonitro.com>
  + Website of the software seen used in exhibit’s A-C.

**Appendix B**

*Exhibit A:*

A screenshot of a computer

Description automatically generated

*Exhibit B:*

A screenshot of a computer

Description automatically generated

*Exhibit C:*

A screenshot of a computer

Description automatically generated

*Exhibit D:*

A screenshot of a computer

Description automatically generated

*Exhibit E:*

A screenshot of a computer

Description automatically generated

Respectfully submitted this 7th day of May 2024

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Noah James