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6

7 **IN THE DISTRICT COURT FOR THE SECOND JUDICIAL DISTRICT**
8 **FOR THE STATE OF IDAHO, IN AND FOR NEZ PERCE COUNTY**

JEREMY L. BASS,

Plaintiff,

vs.

MICHAEL J. NEWELL, c/o IDEA Law
Group, LLC, ESQ,
CARRINGTON MORTGAGE SERVICES,
LLC,
BANK OF AMERICA, N.A.,
RECONTRUST COMPANY, N.A.,
DOE I-X

Defendants.

Case No. CV35221875

**EXPERT WITNESS REPORT
OF JEREMY L. BASS**

DEMAND FOR JURY

9
10
11 COMES NOW Plaintiff, JEREMY L. BASS, to present an Expert
12 Witness Report. Pursuant to the *Federal Rules of Evidence 702*,
13 I, Jeremy L. Bass, Pro Se, submit this Expert Witness Report to
14 provide my expert opinion on the authenticity of the signature
15 in question, which is purportedly mine, in connection with the
16 Amended Complaint in the referenced case.

17
18 I. Qualifications and Expertise
19

1 As a recognized expert in digital technologies and graphic
2 arts, my 30-year career has provided me with extensive
3 experience in areas such as forensic document examination,
4 digital forensics, and signature analysis. My curriculum vitae
5 (CV), attached as EXHIBIT AC, demonstrates my professional
6 achievements, including high-profile collaborations and a
7 history of working with sensitive financial and emergency
8 systems. My expertise is further evidenced by my tenure as the
9 Lead Senior Full Stack DevSecOps for Finance and Administration
10 at Washington State University.

11 12 II. Scope of Investigation and Methodology

13 To determine the authenticity of the questioned signature,
14 I conducted a comprehensive examination using the following
15 industry-standard methods:

- 16
17 1. Visual inspection and magnification of the original
18 document(s) containing the signature in question;
- 19 2. Comparative analysis of the questioned signature with
20 multiple known genuine signatures;
- 21 3. Assessment of signature characteristics, such as slant, pen
22 pressure, and letter formation;
- 23 4. Evaluation of the presence or absence of natural variation;

1 5. Utilization of advanced digital forensic tools to detect
2 signs of tampering or manipulation.
3

4 III. Expert Opinion and Analysis

5 Upon completion of the investigation, I have formed the
6 following expert opinion based on the gathered evidence and my
7 expertise in signature analysis:
8

9 The questioned signature is highly likely not authentic and
10 may be a forgery. The signature exhibits several significant
11 discrepancies when compared to my known genuine signatures,
12 including but not limited to:
13

- 14 1. The slant of the signature differs markedly from the
15 consistent slant observed in my genuine signatures;
- 16 2. The strokes in the questioned signature is inconsistent
17 and lacks the uniformity found in my authentic signatures;
- 18 3. The formation of certain letters in the questioned
19 signature deviates from the established patterns observed
20 in my genuine signatures; Most notably the 'B'
- 21 4. The questioned signature lacks the natural variation that
22 is expected and consistently present in my genuine
23 signatures.

1
2 In addition to the above discrepancies, my digital forensic
3 examination uncovered signs of potential tampering or
4 manipulation within the document containing the questioned
5 signature. Notable is that the signatures are highly pixelated,
6 more so than any surrounding text and the signature lines have a
7 break which can happen when a digital copy paste is done as a
8 white 'halo' will sometime be present on bad cropping or
9 pasting. Although that is not a great indicator on its own it
10 does add to the mountain of tells in these signatures purported
11 to be Mr. Bass' own hand that produced them. These findings
12 raise serious concerns about the authenticity of the signature
13 and the integrity of the document as a whole.

14
15 The most damning aspect of the signature in question is that
16 there is no 'a' in the last name. It's appearance is very much
17 looking like 'Bss'. Mr. Bass is very confident in the fact that
18 he knows how to spell his last name. His father gave it to him,
19 passed down from generations, too far back to trace; he may
20 never make it famous, but he'll never bring it shame, it's his
21 last name.

22
23 IV. Conclusion

1 Based on the thorough examination, comparative analysis,
2 and application of my expertise in signature and document
3 analysis, I conclude that the questioned signature is highly
4 likely not authentic and may be a forgery. This conclusion is
5 supported by the substantial discrepancies observed between the
6 questioned signature and my known genuine signatures, as well as
7 the potential tampering or manipulation detected in the
8 document. The only way to refute this analysis is for an
9 examination of the wet inked copy to be carried out.

10
11 In accordance with the Daubert Standard, which has been
12 adopted in Idaho and governs the admissibility of expert
13 testimony, my expert opinion is based on relevant and reliable
14 methods, procedures, and principles that are generally accepted
15 within the field of signature and document analysis.
16 Furthermore, the General Electric Co. v. Joiner and Kumho Tire
17 Co. v. Carmichael cases emphasize the role of trial judges as
18 gatekeepers in determining the admissibility of expert
19 testimony, including both scientific and non-scientific expert
20 evidence.

21
22 Under Federal Rules of Evidence 704(a), my expert opinion
23 is offered to assist the trier of fact in this case and is not

1 objectionable simply because it embraces an ultimate issue. It
2 is important to note that the ultimate determination of whether
3 the signature is authentic or forged will be made by the judge
4 or jury.

5 6 V. Disclosure of Facts, Data, and Expert Witness Discovery 7

8 In compliance with IRCP 26(b)(5) and Federal Rules of
9 Evidence 705, I have disclosed the following information to
10 facilitate the discovery process for expert witnesses:
11

12 1. My qualifications, including my curriculum vitae (CV),
13 which provides a detailed account of my education, work
14 experience, and professional accomplishments (attached as
15 EXHIBIT AC).
16

17 2. The subject matter of my testimony, which pertains to the
18 authenticity of the questioned signature, its comparison
19 with known genuine signatures, and the detection of any
20 potential tampering or manipulation in the document.
21

22 3. A summary of the facts and data underlying my expert
23 opinion, including the methods and procedures used in my

1 investigation, such as visual inspection, magnification,
2 comparative analysis, assessment of signature
3 characteristics, and digital forensic tools.
4

5 In accordance with Federal Rules of Evidence 705, I am
6 prepared to disclose the specific facts or data underlying my
7 expert opinion during my testimony, should the court or opposing
8 counsel require further clarification or elaboration.
9

10 This Expert Witness Report is submitted in conjunction with
11 the Amended Complaint and supporting documents filed in the case
12 of J.Bass v. BoA, Case No. CV35221875. Please do not hesitate to
13 contact me if you need additional information or clarification
14 regarding the disclosure of facts, data, and expert witness
15 discovery in connection with my Expert Witness Report.
16

Dated this 24 day of March 2023.

Respectfully submitted,

Jeremy L. Bass
Plaintiff/ Pro Se

Signature

CERTIFICATE OF MAILING

I certify that I have sent by email and first-class mail this OPPOSITION TO DEFENDANT'S MOTION TO DISMISS AND STRIKE SUMMONS AND COMPLAINT to Defendants on March 24th, 2023, at the following email address and postal address:

Email: mnewell@idealawgroupllc.com
Postal: Michael J. Newell ISBA #1953
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Jeremy L. Bass
Plaintiff

Signature