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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**

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

15  
16 **I. Qualifications and Expertise**  
17

18 As a recognized expert in digital technologies and graphic arts, my 30-year career has  
19 provided me with extensive experience in areas such as forensic document examination, digital  
20 forensics, and signature analysis. My curriculum vitae (CV), attached as EXHIBIT AC, demonstrates  
21 my professional achievements, including high-profile collaborations and a history of working  
22 with sensitive financial and emergency systems. My expertise is further evidenced by my tenure

1 as the Lead Senior Full Stack DevSecOps for Finance and Administration at Washington State  
2 University.

## 3 4 II. Scope of Investigation and Methodology

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

- 7  
8 1. Visual inspection and magnification of the original document(s) containing the signature  
9 in question;
- 10 2. Comparative analysis of the questioned signature with multiple known genuine  
11 signatures;
- 12 3. Assessment of signature characteristics, such as slant, pen pressure, and letter  
13 formation;
- 14 4. Evaluation of the presence or absence of natural variation;
- 15 5. Utilization of advanced digital forensic tools to detect signs of tampering or  
16 manipulation.

## 17 18 III. Expert Opinion and Analysis

19 Upon completion of the investigation, I have formed the following expert opinion based  
20 on the gathered evidence and my expertise in signature analysis:

21  
22 The questioned signature is highly likely not authentic and may be a forgery. The  
23 signature exhibits several significant discrepancies when compared to my known genuine  
24 signatures, including but not limited to:

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

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

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

1 IV. Conclusion

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

8  
9 In accordance with the Daubert Standard, which has been adopted in Idaho and governs  
10 the admissibility of expert testimony, my expert opinion is based on relevant and reliable  
11 methods, procedures, and principles that are generally accepted within the field of signature and  
12 document analysis. Furthermore, the General Electric Co. v. Joiner and Kumho Tire Co. v.  
13 Carmichael cases emphasize the role of trial judges as gatekeepers in determining the  
14 admissibility of expert testimony, including both scientific and non-scientific expert evidence.

15  
16 Under Federal Rules of Evidence 704(a), my expert opinion is offered to assist the trier of  
17 fact in this case and is not objectionable simply because it embraces an ultimate issue. It is  
18 important to note that the ultimate determination of whether the signature is authentic or  
19 forged will be made by the judge or jury.

20  
21 V. Disclosure of Facts, Data, and Expert Witness Discovery

22  
23 In compliance with IRCP 26(b)(5) and Federal Rules of Evidence 705, I have disclosed the  
24 following information to facilitate the discovery process for expert witnesses:

- 1  
2 1. My qualifications, including my curriculum vitae (CV), which provides a detailed account  
3 of my education, work experience, and professional accomplishments (attached as  
4 EXHIBIT AC).
- 5  
6 2. The subject matter of my testimony, which pertains to the authenticity of the questioned  
7 signature, its comparison with known genuine signatures, and the detection of any  
8 potential tampering or manipulation in the document.
- 9  
10 3. A summary of the facts and data underlying my expert opinion, including the methods  
11 and procedures used in my investigation, such as visual inspection, magnification,  
12 comparative analysis, assessment of signature characteristics, and digital forensic tools.

13  
14 In accordance with Federal Rules of Evidence 705, I am prepared to disclose the specific  
15 facts or data underlying my expert opinion during my testimony, should the court or opposing  
16 counsel require further clarification or elaboration.

17  
18 This Expert Witness Report is submitted in conjunction with the Amended Complaint and  
19 supporting documents filed in the case of J.Bass v. BoA, Case No. CV35221875. Please do not  
20 hesitate to contact me if you need additional information or clarification regarding the  
21 disclosure of facts, data, and expert witness discovery in connection with my Expert Witness  
22 Report.

23  
Dated this 30 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 30th, 2023, at the following email address and postal address:

Email: mnewell@idealawgroupllc.com  
Postal: Michael J. Newell ISBA #1953  
IDEA Law Group, LLC  
4530 S. Eastern Ave., Ste. 10  
Las Vegas, NV 89119

Postal: Randall Szabo #10901  
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Postal: BANK OF AMERICA, N.A  
C T CORPORATION SYSTEM  
1555 W SHORELINE DR  
STE 100  
BOISE, ID 83702

Postal: CARRINGTON MORTGAGE SERVICES  
C T CORPORATION SYSTEM  
1555 W SHORELINE DR  
STE 100  
BOISE, ID 83702

Jeremy L. Bass  
Plaintiff  
  
\_\_\_\_\_

Signature

**ACKNOWLEDGMENT**

STATE OF IDAHO )

: ss.

County of NEZ PERCE COUNTY )

On the \_21\_ day of \_\_FEBRUARY\_\_, 2023, before me, the undersigned Notary Public, personally appeared \_\_Jeremy Bass\_\_, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that s/he executed the same.

IN WITNESS WHEREOF, I have set my hand and seal the day and year as above written.

\_\_\_\_\_  
Notary Public for Idaho

Residing at \_\_\_\_\_

Commission Expires: \_\_\_\_\_