

William J. Paatalo
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Lake Oswego, OR 97034
bpaatalo@yahoo.com
(503) 635-1407

Plaintiff Pro Se

UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA

WILLIAM J. PAATALO,
Plaintiff – *Pro se*,

Case No. 1:10-cv-00119

JUDGE: HON. CAROLYN S. OSTBY

v.

**DECLARATION OF EVIDENCE:
RE: ADJUSTABLE RATE NOTE &
DEED OF TRUST SUBMITTED BY
DEFENDANT JPMORGAN CHASE
BANK, N.A.**

J.P. MORGAN CHASE BANK, N.A., et al.
Defendants.

I, William J. Paatalo, being first duly sworn upon oath, deposes and states as follows:

1. I am the Plaintiff – *Pro Se* in this civil action. I make this affidavit based upon my personal knowledge and in Support of “Plaintiff’s Motion for Extension of Expert Witness Deadline.”

2. On March 8th, 2012, Defendant JPMorgan Chase Bank, N.A. (“Chase”) through its attorneys Charles Smith, Esq. and Elizabeth Kramer, Esq. submitted the email attached hereto as “Exhibit C” along with two attached electronic files purporting to contain scanned color copies of the original documents designated as follows:

323100.PDF

323101.PDF

3. The email with the files attached was transmitted to me at my email address: bill.bpia@gmail.com.
4. The “323100.pdf” includes Plaintiff’s Adjustable Rate Note, Loan No. 3013265883.
5. The “323101.pdf” includes Plaintiff’s Deed of Trust, Loan No. 3013265883-039.”
6. These documents have black and white print but show “blue ink” initials and signatures.
7. On information and belief, Chase is representing these files as digitally scanned representations of the actual original documents corresponding to the files. I understand that Chase is supplying these files in response to Plaintiff’s multiple requests for color copies of the original documents (See “Exhibit - C”).
8. Upon opening both attachments, I magnified the signatures of each document to “800X” on two (17”) computer monitors situated side-by-side. The differences in the appearance of the signatures were obvious. The signature line on the Deed of Trust was blue, and when I moved the “scroll bar” back and forth horizontally on the computer screen with the “Note” signature, the letters in the middle initial and last name fill with unusual colors. Upon

information and belief, this phenomenon occurs when a document has been altered with a computerized software program such as “Photoshop.”

9. The signature line on the Deed of Trust was also “blue” while the other signature lines on the document remained “black.” This was an obvious sign that the document had been altered.
10. Per my recollection, I signed both a Deed of Trust and an Adjustable Rate Note at the closing of the purchase of the subject property on the same day using the same blue ink pen. Again, both signatures appear vastly different.
11. I submitted the files to Dr. Laurie Hoeltzel who is a professional Document Examiner by forwarding the email from Chase’s counsel (“Exhibit C”) directly to Dr. Hoeltzel on March 10th, 2012 (See “Exhibit D”).
12. A true and correct copy of Dr. Hoeltzel’s Declaration and Curriculum Vitae are attached.

Affiant further sayeth not.

DATED this 14th Day of March, 2012.


William J. Paatalo
Plaintiff Pro Se



Bill Paatalo <bill.bpia@gmail.com>

FW: Paatalo color documents

1 message

Charlie Smith <cks@prrlaw.com>
To: Bill Paatalo <bill.bpia@gmail.com>
Cc: "Kramer, Elizabeth" <Liz.Kramer@leonard.com>

Thu, Mar 8, 2012 at 3:06 PM

Bill,

As you requested, scanned COLOR copies of the original docs are attached.

BP Investigative Agency
EXHIBIT

C

1. Adjustable Rate Note
2. Deed of Trust
3. Loan Policy of Title Insurance

Thanks,
Charlie.

3 attachments

 **323100.PDF**
128K

 **323101.PDF**
510K

 **323102.PDF**
373K



Bill Paatalo <bill.bpia@gmail.com>

Fwd: FW: Paatalo color documents

1 message

Bill Paatalo <bill.bpia@gmail.com>

Sat, Mar 10, 2012 at 2:37 PM

To: "lah78@msn.com" <lah78@msn.com>

----- Forwarded message -----

From: "Charlie Smith" <cks@prrlaw.com>

Date: Mar 8, 2012 3:06 PM

Subject: FW: Paatalo color documents

To: "Bill Paatalo" <bill.bpia@gmail.com>

Cc: "Kramer, Elizabeth" <Liz.Kramer@leonard.com>

BP Investigative Agency
EXHIBIT

D

Bill,

As you requested, scanned COLOR copies of the original docs are attached.

1. Adjustable Rate Note
2. Deed of Trust
3. Loan Policy of Title Insurance

Thanks,
Charlie.

3 attachments

 **323100.PDF**
128K

 **323101.PDF**
510K

 **323102.PDF**
373K

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DECLARATION OF LAURIE HOELTZEL

I, LAURIE HOELTZEL, hereby declare as follows:

1. I am a Court Qualified Document Examiner and Handwriting Expert in the field of questioned documents in the State of California. I am over the age of eighteen years, am of sound mind, having never been convicted of a felony or crime of moral turpitude; I am competent in all respects to make this Declaration. I have personal knowledge of the matters declared herein, and if called to testify, I could and would competently testify thereto.

2. I have studied and was trained in the examination, comparison, analysis and identification of handwriting, discrimination and identification of writing, altered numbers and altered documents, handwriting analysis, trait analysis, including the discipline of examining signatures, with over twenty (20) years of experience in this field. A true and correct copy of my current Curriculum Vitae ("C.V.") is attached as "Exhibit 1".

3. **Request:** I was asked to review the documents in question to determine if the signatures of **WILLIAM J. PAATALO** are authentic. Today I have examined the initials & signatures of **WILLIAM J. PAATALO** on the questioned documents to determine if there were any alterations within the initials & signatures. Below are the documents I was asked to examine:

4. **Exhibit List: Questioned Documents**

Exhibit 2. Q1 – Page 6 of a 6 page Adjustable Rate Note, Borrower being William J. Paatalo, Lender being Washington Mutual Bank, FA dated January 30, 2007, bearing the purported signature of WILLIAM J. PAATALO.

Exhibit 3. Q2- Pages 1 through 15 of a 16 page Deed of Trust, Borrower being William J. Paatalo, Lender being Washington Mutual Bank, dated January 30, 2007, bearing the purported signature of WILLIAM J. PAATALO.

1 **Exhibit 4. Q3-** Page 1 and 2 of a Second Home Rider, Borrower being William J.
2 Paatalo, Lender being Washington Mutual Bank, FA dated January 30, 2007, bearing the
3 purported signature of WILLIAM J. PAATALO.

4 5. **Conclusion:** Based upon my thorough analysis of these items, and from an application of
5 accepted forensic document examination tools, principles and techniques my professional opinion
6 follows.

7 A. Pertaining to the alleged initials & signatures of **WILLIAM J. PAATALO** on Exhibits
8 2, 'Q1' through Exhibit 4, 'Q3' documents: It is highly probable the author of the
9 **WILLIAM J. PAATALO** initials & signatures on the questioned documents were
10 indeed altered.

11 This document examiner's professional opinion is that **WILLIAM J. PAATALO**
12 signatures on the questioned documents 'Q1' through 'Q3' are forgeries.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct and that this declaration was executed on the 13th day of March,
15 2012, in San Bernardino, California.

16 I am willing to testify to this in a court of law and I will prove to the Court that my opinion is
17 correct.

18 Respectfully submitted,

19 
20 DR. LAURIE HOELTZEL

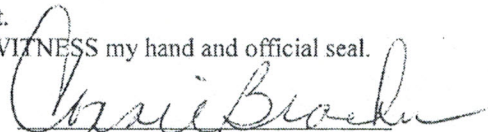
21 STATE OF CALIFORNIA §
22 SAN BERNARDINO
23 COUNTY OF LOS ANGELES §

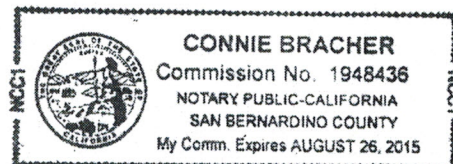
24 On March 14, 2012 before me, CONNIE BRACHER, personally appeared Laurie
25 Hoeltzel, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the
26 within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her
27 signature on the instrument the person, executed the instrument.

28 I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true
and correct.

WITNESS my hand and official seal.

Signature





Dr. Laurie A. Hoeltzel

California Handwriting Expert

PO Box 1496* Crestline* CA* 92325

Office: 909-338-4247 Cell: 310-985-2807 Fax: 310-943-2647

E-mail: laurie@californiahandwritingexpert.com

www.CaliforniaHandwritingExpert.com

Curriculum Vitae

Laurie Hoeltzel, is a court qualified Forensic Document Examiner, she has studied handwriting examination for the past twenty (20) years and apprenticed under some of the leading court-qualified Forensic Document Experts in the U.S.A. such as: Don Lehew, Texas, and Curt Baggett, Texas all internationally famous handwriting and document examination experts.

Laurie offers a verbal opinion or a court qualified opinion to include but not limited to the following: Disputed documents or signatures including: wills, checks, contracts, deeds, account ledgers, mortgages, loans, notary disputes and medical records. Investigation and analysis including: questioned signatures, suspect documents, forgeries, identity theft, robo-signing, anonymous letters, alterations, obliterations, erasures, typewritten documents, altered medical records, graffiti, handwritten numbers, and computerized and handwritten documents.

Education:

Laurie spent 11 years serving her country in the United States Air Force including three tours of duty in Iraq, meantime obtaining a Bachelors degree in Business Management and handwriting analysis certificates and studying document examination.

Barron University, Los Angeles, CA: PhD's

Capella University, Minneapolis, MN: Bachelor's Business Management

Handwriting University, Dallas, Texas: Apprentice under Curt Baggett, Graduated 2004 (received multiple forensic document certifications 1994-current)

2004 School of Forensic Document Examination's Teleclass Curriculum
Examination of Anonymous Writing by Reed Hayes, QDE
Document Examination Terminology by Don Lehew, QDE
Notary Public by Don Lehew, QDE

Advanced Forgery Identification by Don Lehew, QDE

2006 School of Forensic Document Examination's Annual Conference, Dallas, Texas

Attended the following lectures, in addition to general sessions:

Deposition and Cross Examinations by Dr. Richard Frazier, QDE

Medical Problems Affecting handwriting by Dr. Richard Frazier, QDE

Legal Issues for Document Examiners by Dr. Richard Frazier, QDE

Deposition and Cross Examinations by Dr. Richard Frazier, QDE

Health Factors Affecting Handwriting by Dr. Joe Alexander, QDE

Prescription Forgery and Medical Crimes by Diane King

Lecturer-Curt Baggett

2007 Handwriting University Annual Conference, Dallas, Texas

Curt Baggett-Trainer and Instructor

2007 School of Forensic Document Examination's Teleclasses

Curt Baggett Instructor - Handwriting Basics and Exemplars

Curt Baggett Instructor - Multiple Classes on Case Studies and Examinations

2008 Handwriting University Annual Conference, Las Vegas, Nevada

Curt Baggett-Trainer and Instructor

2009 Handwriting University Annual Conference, Las Vegas, Nevada

Critical Incident Stress: Statement Analysis and Interview v. Interrogation by Faith Wood

Forensic Document Examination Application by Robert Baier, QDE, Police Instructor

Introduction to Forensic Document Examination-Curt Baggett

Further Qualifications:

I have reviewed numerous signatures and handwritings, examined case documents and rendered an opinion on cases in Alabama, California, Colorado, Florida, Indiana, Iowa, Illinois, Kansas, Kentucky, Louisiana, Maryland, New Jersey, New Mexico, New York, Pennsylvania, South Carolina, Texas, Wisconsin, Washington D.C., Montreal, Quebec, Canada and Freeport, Bahamas.

Laboratory Equipment used for examination:

Her laboratory consists of equipment used for examination, such as: 10x – 400x twin/digital microscope; HP flat bed scanner; light table; numerous magnifying devices; Canon SD700 digital camera; Canon Powershot S2; protractor and metric measuring devices; powerpoint; photoshop program and transparencies.

Specific Areas of Training:

Handwriting Identification and Discrimination, Signature Comparison, Techniques for Distinguishing Forged Signatures, Disguised Handwriting, Altered Numbers, Anonymous Writing, Factors that Affect Writing

Library:

Numerous forensic document examination books and other handwriting reference materials:

To include but not limited to:

The Expert Witness Handbook by Dan Poynter

Document Examiner Textbook by Jess E. Dines

Handwriting Identification: Facts and Fundamentals by Roy A. Huber & A. M. headrick

Testimony

December 7, 2001

San Bernardino County Superior Court

Lalita Booker vs Millie Williams

Case No.: SCVSS145195

Assigned Judge John P. Vanderfeer

September 21, 2011

Ventura County Superior Court

Riggs v. Aurora Loan Servicing

Case No. #56-2011-00394035

Assigned Judge Frederick Byshe

September 11, 2011

Central District Bankruptcy Court

Nick James Bankruptcy

Case No. 2:11-bk-25454-VZ

Curt Baggett/Laurie Hoeltzel

EXHIBIT 1

June 23, 2010

Circuit Court, Branch 1
Green County, Wisconsin
Warner Kent Bahler v. David Bahler et, al.
Case No. 08-CV-188

June 9, 2008

The Supreme Court of the Bahamas
Freeport, Bahamas
Nicole Longley v Kim Monique Stuart
Case No. 2006/CLE/gen/01210
Assigned Justice Mrs. Estelle Gray Evans

February 8, 2008

336th District Court of Grayson County
Sherman, Texas
Paul Allen and Sharleen Wilson v. Allen Bryon Wilson
Case No. 07-1451-336
Assigned Judge Blake

December 17, 2007

Superior Court of the State of California
County of San Bernadino, Redlands, California
LaMonte William Ward Trust
Case No. PRO50700188
Assigned Judge Cynthia Ludvigsen