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Attorneys for Twin Galaxies, LLC

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Superior Court of California,
County of Los Angeles
9/06/2023 3:47 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By V. Sino-Cruz, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

WILLIAM JAMES MITCHELL,

Plaintiff,

v.

TWIN GALAXIES, LLC; and Does 1-10,

Defendants.

AND RELATED CROSS-ACTION

Case No. 19STCV12592

Assigned to: Hon. Wendy Chang
[Dept. 36]

**DECLARATION OF MATTHEW
"MOTTI" GABLER**

*[Filed concurrently with: (1) Motion to
Compel; (2) Declaration of Laura Carrell; (3)
Declaration of David A. Tashroudian; (4)
Declaration of Jacob Pilkington; and (5)
Compendium of Evidence]*

Hearing

Date: September 28, 2023

Time: 8:30 a.m.

Place: Department 36

Reservation ID: Reserved by Court

Action Filed: 4/11/2019

DECLARATION OF MATTHEW “MOTTI” GABLER

I, Mathew “Motti” Gabler, declare as follows:

1. I am an individual over the age of 18 and I make this declaration based upon facts known to me personally to be true.

2. I am a Forensic Expert employed by National Center for Audio and Video Forensics (“NCAVF”). I have been employed by NCAVF for nine years and have worked as a Forensic Expert for over six years. My role as a Forensic Expert includes the recovery, preservation, enhancement, and analysis of digital multimedia evidence. I am a Certified Forensic Video Technician with the Law Enforcement and Emergency Video Association, Inc. (“LEVA”).

3. I have worked as a forensic expert on thousands of cases, both criminal and civil, and have assisted prosecutors, police officers, detectives, insurance investigators, public defenders, private attorneys, and corporations across the country with their cases. Furthermore, I have testified over 50 times in state superior courts, depositions, and federal court. I am also certified with the California State Bar to teach a continuing education class to attorneys titled, "Utilizing Audio and Video Evidence in Civil and Criminal Litigation" and I have taught classes and seminars in forensics to other forensic experts, investigators, police officers, attorneys, and more. A true and correct copy of my current *curriculum vitae* is attached hereto as Exhibit 1.

4. The equipment and software I used for this case includes: (1) Mac Studio 2022; (2) Keynote; and (3) Adobe Photoshop 2023. I know from my experience that this equipment and software was sufficient to fulfill the scope of my engagement.

SCOPE OF ENGAGEMENT

5. I was engaged by the plaintiff and cross-complainant Twin Galaxies, LLC and its attorney David Tashroudian to perform two assignments.

6. The first assignment was to determine if the standing plaque with a base in the digital image with filename “IVGHOF.jpeg” (the “Purported Modified Plaque”) was the same object depicted in the digital image referred to as “Mall of America Plaque [Walter Day].jpeg” (the “Purported Original Plaque”).

1 7. The second assignment was to compare four digital image examples of the
2 Purported Original Plaque to each other to determine if they all have the same text pattern in the
3 embossed letter; and whether the Purported Modified Plaque has a different text pattern.

4 8. Mr. Tashroudian provided me with all of the images used in my reports.

5 EXPERT OPINION

6 9. My forensic comparative analysis of the Purported Modified Plaque and the
7 Purported Original Plaque informs my professional opinion that the plaques depicted therein are
8 not the same object.

9 10. My forensic comparative analysis of the four digital image examples of the
10 Purported Original Plaque depicted in my report informs my professional opinion that all four
11 have the same text pattern in the embossed letter but the Purported Modified Plaque does not.

12 COMPARATIVE ANALYSIS – ASSIGNMENT 1

13 11. I prepared a report of my comparative analysis of the standing plaque with a base
14 in “IVGHOF.jpeg” to the plaque in “Mall of America Plaque [Walter Day].jpeg” (the “Assignment
15 1 Report”). A true and correct copy of this report is attached hereto as Exhibit 2.

16 12. Page 3 of the Assignment 1 Report shows the original images that I was asked to
17 study. In order to compare the two images, I cropped the plaques from the original images and
18 adjusted the cropped images to correct both to be uniform in size and perspective. The images
19 were adjusted relative to the size of the letter engraving. The plaques as adjusted to normalize the
20 letter size are shown on pages 5 and 6 of the report. The blue line across the top of the plaques in
21 the figure on page 6 shows the letter appearing on both is normalized in size.

22 13. I performed a morphological image analysis to compare these two plaques. A
23 morphological image analysis includes examining the relative shape, positioning, size, and
24 location of objects in an image. The figure in page 6 forms the basis of my analysis.

25 14. My morphological analysis of the plaques is reflected on page 8 of the Assignment
26 1 Report. The blue comparison arrows show that Purported Modified Plaque is not the same as
27 the Purported Original Plaque because the size of Pac-Man is much different in each example. In
28 the Purported Modified Plaque, the top of the Pac-Man’s figure – his left eyebrow – lines-up with

1 the center of the address block; whereas his eye-brow in the Purported Original Plaque lines up
2 with the date at the top. Similarly, the bottom of Pac-Man's boot in the Purported Modified
3 Plaque lines up with the middle of the signature block; whereas his boot in the Purported Original
4 Plaque lines up the NAMCO logo at the bottom of the plaque.

5 15. The pink lines at the center of each plaque similarly show the difference in Pac-
6 Man's size relative to the length of the letter. The Pac-Man figure in the Purported Modified
7 Plaque is much shorter and smaller than the Pac-Man in the Purported Original Plaque.

8 16. The feet on the base of the two plaques are also different. The pink and green lines
9 on the lower part of the study highlight the differences.

10 17. The study on page 9 of the Assignment 1 Report shows the difference in the size
11 of Pac-Man on each of the original examples without being corrected for size or perspective. This
12 analysis too shows the difference in size of Pac-Man.

13 18. I also compared the text in the letter appearing on both plaques to see if the text
14 pattern was the same. My analysis is shown on page 11 of the Assignment 1 Report. My analysis
15 shows that Purported Modified Plaque has a total of 17 lines of text compared to the Purported
16 Original Plaque's total of 15 lines of text. The center paragraph is the different one. The modified
17 example has 11 lines of text in the center paragraph but the original has 9 lines of text.

18 COMPARATIVE ANALYSIS – ASSIGNMENT 2

19 19. I prepared a report for my comparative analysis of four image examples of what I
20 was told by Mr. Tashroudian were pictures of the Purported Original Plaque (the "Assignment 2
21 Report"). A true and correct copy of this report is attached hereto as Exhibit 3.

22 20. The four examples of the Purported Original Plaque I analyzed are shown on page
23 2 of the Assignment 2 Report. The two pictures on the left depict the same plaque. The two in
24 the middle are the Purported Original Plaque on top with the Purported Modified Plaque on
25 bottom. And the two pictures on the right are screen-captures stills of movies featuring Billy
26 Mitchell. The top right is a still from the film *King of Kong: A fistful of Quarters*. The bottom
27 right is a still from the film *Chasing Ghosts: Beyond the Arcade*.

21. I compared the four examples of the Purported Original Plaque to each other by identifying the number of lines of text in each paragraph of the engraved letter. My analysis is reflected in pages 4-8 of the Assignment 2 Report. Each of the four examples of the Purported Original Plaque have matching text patterns with three (3) lines in the first paragraph, nine (9) lines in the second paragraph, two (2) lines in the third paragraph, and one (1) line in the last paragraph. Each have a total of fifteen (15) lines of text in the body of the letter. Each plaque appears to have the same text pattern.

22. The Purported Modified Plaque shown on page 10 of the Assignment 2 Report is different than the Purported Original Plaque examples in that it has seventeen (17) total lines of text in the body and eleven (11) in the second paragraph.

23. I also analyzed the second plaque in the “IVGHOF.jpeg” image, the one laying down on the table, at page 9 of the Assignment 2 Report. That plaque shows a text pattern similar to the four examples of Purported with three (3) lines in the first paragraph, nine (9) lines in the second paragraph, two (2) lines in the third paragraph, and one (1) line in the last paragraph – for a total of fifteen (15) lines.

ADDITIONAL OBSERVATIONS

24. I observed that the “IVGHOF.jpeg” file was abnormally small at 152 kilobytes with a resolution of 1600x1200 or 1.9 megapixels. For comparison, most base model modern (last three years) mobile device cameras are rated at 8.0 megapixels or more. I also noted that there was no metadata in the file to indicate what device the image derived from which is unusual.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this fourth day of September, 2023 at Los Angeles, California.

Matt Bell

Matthew “Motti” Gabler

EXHIBIT 1



Matthew "Motti" Gabler, BSCJ, CFVT, CCO, CCPA
Forensic Expert
The National Center for Audio and Video Forensics

Curriculum Vitae (August 05, 2023)

6363 Wilshire Blvd, Suite 115
Los Angeles, California, 90048

phone:(213) 973-7811
email: motti@ncavf.com
NCAVF.com

About

Although my legal name is Matthew Gabler, friends, colleagues, and clients all know me as "Motti". I am forensic expert with the National Center for Audio and Video Forensics (NCAVF). I have worked for NCAVF since 2014. I started as a case manager but soon after began training in forensics. Today, I am a trained and certified forensic expert and I am involved in all stages of the evidence workflow process. This process includes the collection or recovery of evidence, the analysis and comparison of evidence, and/or the enhancement of the evidence. I evaluate and analyze evidence and oversee the enhancement process to make sure all work is done in accordance with the standards and best practices for forensics in digital multimedia evidence.

Education

Allan Hancock College, Santa Maria, CA - A.A. Liberal Arts, 2001
Aspen University, Denver, CO - B.S. Criminal Justice, 2023 (Summa Cum Laude)

- Criminalistics and Crime Scene Investigation and Analysis
- Best Practices in Evidence Collection and Preservation
- Traffic Collision and Speed Analysis
- Kinesic Interviewing and Interrogation (Determining Truthfulness in Interviews)
- Police Field Operations and Community Policing Techniques
- Organized Crime and White Collar Crime
- Criminal Law, Constitutional Law, and Juvenile Justice

Certifications

LEVA Certified Forensic Video Technician (CVFT), Certification 2022

- Knowledgeable in the principles of video technology
- Proper handling of analog and digital multimedia evidence
- Data authentication and integrity (evidence verification)
- Digital evidence extraction, recovery, and preservation
- Forensic processing techniques of digital multimedia evidence

- Legal aspects of video evidence
- Ethics for expert witnesses

(Established in 1989, the Law Enforcement and Emergency Services Video Association, Inc. (LEVA) is a 501(c)(3) nonprofit corporation committed to providing advanced training and certification in the science of forensic video analysis.)

Cellebrite Certified Operator (CCO), Certification 2021

- Knowledgeable in the use of UFED Touch, UFED Touch 2 and UFED 4PC, and Cellebrite Physical Analyzer software programs.
- Trained in conducting data extractions from devices using UFED Hardware and Software.
- Proficient in data searches using Cellebrite Physical Analyzer.
- Training in creating reports using Cellebrite Physical Analyzer.
- Familiar with the best practices for the on-scene identification, collection, packaging, transporting, examination and storage of digital evidence data and devices.

Cellebrite Certified Physical Analyst (CCPA), Certified 2021

- Advanced training in mobile device forensic analysis using the UFED Physical Analyzer software.
- Trained in authentication and validation of data parsed and collected as evidence.
- Trained in the use of the Physical Analyzer software which allows the examination of various types of data extracted from devices.

(Cellebrite software programs are used by forensic examiners, law enforcement, and corporations all over the world for the acquisition and analysis of digital evidence. Cellebrite also provides training and certification programs in a variety of forensic science disciplines including mobile device forensics, video forensics, computer forensics, and more.)

NRA Certified Firearms Instructor (NRA, Shoot Safe Learning), Certification 2021

Training and Classes

LEVA 1: Forensic Video Analysis and the Law (Certificate, 2021)

LEVA 2: Digital Multimedia Evidence Processing (Certificate, 2022)

LEVA 3: Principles of Forensic Video/Image Compare and Contrast (Certificate, 2023)

LEVA Workflow Analysis 101 (2020)

- Principles in the best practices for digital multimedia evidence workflow

Essential Defensive Pistol Certificate (NRA/Shoot Safe Learning)

Tactical Pistol Certificate (NRA/Shoot Safe Learning)

Advanced Tactical Pistol Certificate (NRA/Shoot Safe Learning)

Tactical Rifle Defense Certificate (NRA/Shoot Safe Learning)

California Dept. of Justice Handgun Safety Certification

Conference: Techno Security and Digital Forensics Conference (2019, 2020)

- The conference provides education and training that includes classes in digital forensics and cybersecurity. Topics include video forensics, mobile device forensics, computer forensics, cyber security, and more.

Seminar: FBI Next Generation Identification (2020)

- Criminal Justice Information Services Division of the FBI
- Biometrics, Fingerprints, Facial Recognition, Iris ID

Training Seminar: Tactical Concepts for Law Enforcement Operations (2018)

- Lt. Pearson, Fort Collins Police Dept.

Training Seminar: Optics to Increase Survivability for Officers in Unpredictable Environments (2018)

- Raytheon

Professional Memberships:

International Association for Identification (IAI, member since 2023)

- The IAI, the largest forensic organization in the world, vets all its members prior to being admitted to the organization. The IAI's main goals are to educate its members on current standards and best practices in forensics, to encourage and support research in the science of forensics, and to provide training and/or certifications in many forensic disciplines.

American Society of Digital Forensics & eDiscovery (ASDFED, member since 2022)

- ASDFED is a professional organization for forensic experts, criminalists, police officers, analysts, investigators, and more who work in the field of digital evidence forensics. ASDFED offers classes in digital forensics, networking between forensic experts, and more.

Law Enforcement and Emergency Services Video Association, Inc. (LEVA, member since 2021)

- LEVA provides advanced training and certification in the science of forensic video analysis. Its members include forensic experts from all over the world. LEVA's classes and certifications in video forensics teach the most current standards and best practices in video forensics.

Audio Engineering Society (AES, member since 2021)

- AES is a professional organization for forensic experts, engineers, scientists, and other individuals with an involvement in the professional audio industry.

High Tech Crime Consortium (HTCC, member since 2018)

- HTCC is an international organization connecting forensic experts, police, and investigators that share information and offer each other help and advice in digital forensics, cybercrime, and related topics.

Other Training and Certifications:

Los Angeles County Emergency Medical Services, EMT-1 (Retired)

Emergency Medical Services Academy (Allan Hancock College)

EVOG Certification

- Emergency Vehicle Operations Course
- Techniques for code 3 operations

CEVO-II Certification

- Comprehensive defensive driving training for emergency and non-emergency driving operations for emergency vehicle operations

Hazmat Certification

Bloodborne Pathogens (National Safety Council) Certification

Community First Aid and Safety (CA State Title 22) Certification

Open Water and Master SCUBA Diver (PADI and Naui) Certification

Teaching and Speaking Engagements

California Association of Licensed Investigators

Collection, Preservation, and Analysis of Digital Video Evidence

Techno Security and Digital Forensics Conference

Collection, Preservation, and Analysis of Digital Video Evidence

Riverside Bar Association

MCLE - Utilizing Video, Audio, & Still Image Evidence in Court

Santa Barbara Paralegal Association

MCLE - Utilizing Video, Audio, & Still Image Evidence in Court

CSUN Alumni Attorney Association

MCLE - Utilizing Video and Audio Evidence in Criminal and Civil Litigation

Expert Witness Panels/Approved Counties

- Los Angeles County Superior Court
- San Francisco County List of Approved Expert Witnesses
- Del Norte County
- El Dorado County
- Fresno County
- Marin County
- Mariposa County
- Maricopa County List of Approved Expert Witnesses

Testimony

- Video Analysis 38 times
- Audio Analysis 7 times
- Still Image Analysis 4 times
- Cell Phone Analysis 6 times
- Firearms 2 times

Criminal and Civil Cases (Testified)

Michael Tater, Pro Se

- Michael Tater, et al. v City of Huntington Beach, et al. (testified in deposition) - video analysis

Attorney Samuel Ogbogu, Law Office of Samuel Ogbogu

- Sobenna Dunu v Dustin McCuan and Griffith Company (testified in deposition) - cell phone data analysis

Attorney Greg Herring, Herring Law Group

- Edwards v Edwards (testified in court) - video analysis

Attorney Evie Jeang, Ideal Legal Group Inc.

- Xin Xie v Tong Chen (testified in court) - audio analysis

Attorney Aine Thein, Los Angeles County Public Defender

- People v Veronica Zamora (testified in court) - video analysis

Attorney Rudy Ruiz, Vanderford & Ruiz

- Jasmin Torres v LAUSD (testified in deposition) - cell phone analysis, video analysis

Attorney Nico Ambrose, Alaska Public Defender Agency

- State of Alaska v Fenton Leon Jacobs, Jr. (testified in court) - video analysis

Attorney Yasmin Fardghassemi, Los Angeles District Attorney's Office

- People v Kaalan Walker (testified in court) - video analysis

Attorney Brett Shimanovsky

- Hohman v Insight Consulting Group (testified in deposition) - video analysis

Attorney Pro Per Nick Lopez

- People v Nick Lopez (testified in court) - still image analysis

Attorney Thomas Flaskamp, Donna Law Firm, P.C.

- Juan Garcia v Desiree Medina and MUY Pizza-Tejas, LLC (testified in deposition) - video analysis

Attorney Peter Marchesi, Wheeler & Army, P.A.

- Dunnigan v York County (testified in deposition) - video analysis

Attorney Ivonne De La Cruz, Los Angeles County Public Defender

- People v Gerardo Zendejas (testified in court) - video analysis, firearms analysis

Attorney Greg Salarz, Veatch Carlson, LLP

- Claus v Clark (testified in deposition) - video analysis

Attorney Bryan O'Conner, O'Conner Law Group

- Alcorn v City of Chicago (testified in deposition) - video analysis

Attorney Ginger Mooney, Ginger G. Mooney, LLC

- Curry v Laney (testified in court) - video analysis

Attorney Warren Shiell, Law Offices of Warren Shiell

- Alexis Schrage v Leonard Schrage (testified in court) - video analysis

Attorney Melanie Pfeifer, Daphne Edwards Divorce & Family Law, PC

- Sarah Lee v David Hur (testified in court) - video/audio analysis

Attorney Benny Bakshandeh, Los Angeles County Public Defender

- People v Antwan Wells (testified in court) - video analysis

Attorney Stacey Sullivan, Liebert, Cassidy, Whitmore

- Gutierrez v City of Rialto (testified in court) - video analysis

Attorney Chandra Moss, Holstrom, Block & Parke, APLC

- Tanner Gill v Danielle Gill (testified in court) - cell phone analysis

Attorney Steven Glickman, Glickman & Glickman, A Law Corporation

- Sheldon Lockett v County of Los Angeles (testified in deposition) - cell phone analysis

Attorney Michael R. Nebenzahl, Burke, Williams, Sorensen, LLP

- Dib v City of Beverly Hills (testified in deposition) - video analysis

Attorney Simon Budhwani, Core Law Group, LLP

- Sadeghi v Sadeghi (testified in court) - audio analysis, video analysis

Attorney Pamela Jones, Los Angeles County Public Defender

- People v Salvador Espinoza (testified in court) - video analysis

Attorney John Carpenter, Carpenter, Zuckerman & Rowley

- Jason Ashley v Krehbiel (testified in deposition) - video analysis

Attorney Steven Glickman, Glickman & Glickman, A Law Corporation

- Francesco Galasso, et al. v Randal D. Haworth, M.D. (testified in deposition x3, testified in court) - video analysis

Attorney Anna Karczag, Encore Law Group, LLP

- Luis Moro v Ari Lezama (testified in court) - cell phone analysis, video analysis, audio analysis

Attorney Stephanie Zacarias, Los Angeles County Public Defender

- People v Kobe Bell (testified in court) - video analysis

Attorney Laurie Harrold, Mark R. Weiner & Associates

- Toledo v Abnoosian (testified in court) - video analysis

Attorney Brad Beherns, Hayes, Ortega & Sanchez, LLP

- Gricelda Perez v City of Ontario (testified in court) - video analysis

Attorney Salvatore Ciulla, Law Office of Salvatore Ciulla

- People v Houssin Nayeri (testified in court) - still image analysis

Attorney Mike Wallace, Law Office of Mike Wallace

- US v Leon Martinez (testified in Federal court) - still image analysis

Attorney John Howard, Lowthorp, Richards, McMillan, Miller & Templemen

- Caceres v City of Fontana (testified in deposition & court) - video analysis

Attorney Michael Levin, Wegman & Levin

- People v Terry Gillard (testified in court) - video analysis, cell phone analysis

Attorney Amanda Touchton, Touchton & Weinberger LLP

- People v Jamal Frazier (testified in court) - video analysis

Attorney Kamau Edwards, Hartsuyker, Sratman & Williams-Abrego

- Dietrich Lee v 1377 Imperial, LLC, et al. (testified in court) - video analysis

Attorney James Clark, Law Office of James Stillman Clark

- People v Chris Hoover (testified in court) - audio analysis

Attorney Michael Duggan, The Law Office of Michael Duggan

- People v Robert Mitchell (testified in court) - video analysis

Attorney Charles Lew, The Lew Firm, APC

- Ron Masson v Stephanie Paine (testified in court) - audio analysis

Attorney Arthur Allen, Office of the Public Defender Green County

- Appeal of Neil Johnson (testified in court) - video analysis

Attorney Kerry Armstrong, Law Offices of Kerry L. Armstrong

- People v John Neuhart II (testified in court) - video analysis

Attorney Azad Jingoian, Law Offices of Azad Jingoian

- People v Salman Sajid (testified in court) - still image analysis

Attorney Doug Rhoades, Mendocino County Alternate Public Defender's Office

- People v Ryan Maxstadt (testified in court) - video analysis, audio analysis, and firearms

Attorney Leonard Becker, Leonard S. Becker, Attorney at Law

- Bragar v Chicago Transit Authority (testified in court) - video analysis

Attorney Chris Napolitano, Enszt & Jester, P.C.

- Kimberly Whyley v Village of Oakview, et al. (testified in deposition) - video analysis, audio analysis

Attorney Gil Arbel, Southern California Legal Advocates

- People v Jack Shlush (testified in court) - audio analysis

Attorney Arthur Allen, Missouri State Public Defender's Office

- Appeal of Neil Johnson (testified in court) - video analysis

Attorney Jonathan Herzog, Weston Herzog, LLP

- Theresa Williams v Albertson's (testified in court) - video analysis

Attorney Vanessa Hierbaum, County of Santa Clara Public Defender's Office

- Peng v Liu (testified in court) - audio analysis

Attorney Daniel Portman, County of Santa Clara Public Defender's Office

- People v Jesse Yanez (testified in court) - video analysis

Attorney Martin Holly, Manning & Kass, Ellrod, Ramirez, Trester LLP

- Trang Le Truong v Target Corp. (testified in court) - video analysis

Attorney Scott Spindel, Melnick & Spindel

- People v John Pulskamp (testified in court) - video analysis, firearms

Cases For Law Enforcement, District Attorneys, etc.

Assistant District Attorney Yasmin Fardghassesemi, Los Angeles, CA

- People v Kaalan Walker

Detective Jason Davila, Pima County Sheriff's Dept., Arizona

- PCSD Case 220329038
- PCSD Case 211023270
- PCSD Homicide Case 220621324
- PCSD Case 220711238
- PCSD Case 220125128

Detective Jonathan Siress, Pima County Sheriff's Dept., Arizona

- PCSD Case 2201251128

Assistant District Attorney Thomas Leon, Los Angeles, CA

- Torrance Police Dept. Special Prosecutor Investigation
- Torrance Police Dept. Special Prosecutor Investigation, 12092018 OIS

Detective Joe Stager, Douglasville Police Dept., Georgia

- Traffic/Homicide, Case # 21-002606

Detective Katrina Ball, Sheriff's Office of Grant County, Washington

- Homicide Investigation, Case # 99GS04574

Detective Phil Branch, Turks & Caicos Police

- Homicide Investigation of Bruno L.

Detective Richard McDonald, Eddy County Prosecutor's Office

- State of New Mexico v Jerrold Chavarria

Oakland PD Internal Affairs Division, Oakland Police Department

- Oakland PD OIS Investigation
- Oakland IAD Case 21-1410
- Oakland IAD Case 22-0040
- Oakland IAD Case 21-1558
- Oakland IAD Case 22-0796
- Oakland IAD Case 21-3334

Detective Francis Hardiman, Los Angeles County Sheriff's Department

- Vaquerito Homicide Investigation, Case 018-18070-2173-011

Assistant District Attorney Cathy Lee, Los Angeles County District Attorney's Office

- People v Brian Barrale

Detective Joseph Horsman, Sonoma County Sheriff's Office

- Rohnert Park Police OIS Investigation

Detective Ralph Ballew, Rialto Police Department

- Baseline Rd Homicide Investigation Case # DR931901693

Detective Scott Mueller, Minnesota Bureau of Criminal Apprehension

- Minnesota OIS, Case # 2018/457
- Lake Elmo OIS, Case # 2018-301
- Minnesota OIS, Case # 2021-481

Investigator Anna Hazel, Merced County District Attorney's Office

- Nightclub Brawl Investigation

Detective Jeffrey Toney, Sonoma County Sheriff's Office

- Porter Creek Homicide Investigation

Detective Carlos Macias, Ventura County Sheriff's Department

- Vergara Investigation, Case# 17-146302

Detective Chris Gamm, Shawano County Sheriff's Department

- James Radford Homicide Investigation, Case # S16-03693

Asst. District Attorney Lucas See, Hardy County Prosecuting Attorney's Office

- State of West Virginia v Jerud Crites

EXHIBIT 2



Mitchell v Twin Galaxies

FORENSIC COMPARATIVE ANALYSIS

ORIGINAL PICTURES

Purported Modified



IVGHOF.jpeg

Purported Original



Mall of America Plaque [Walter Day].jpeg

ENLARGED PICTURES
&
PERSPECTIVE CORRECTION

Purported Modified



IVGHOF.jpeg

Purported Original



Mall of America Plaque [Walter Day].jpeg

Purported Modified



IVGHOF.jpeg

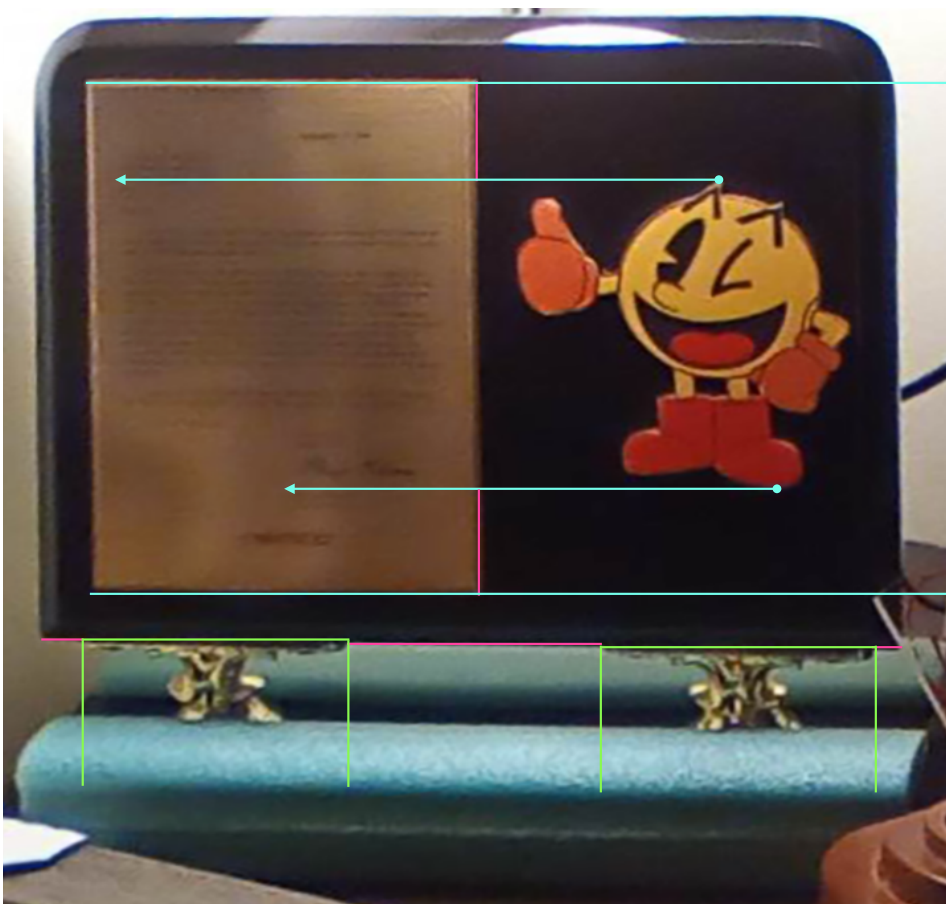
Purported Original



Mall of America Plaque [Walter Day].jpeg

MORPHOLOGICAL ANALYSIS

Purported Modified



IVGHOF.jpeg

Purported Original



Mall of America Plaque [Walter Day].jpeg

A photograph of a desk setup. In the foreground, a framed certificate titled "THE PLAYER OF THE CENTURY AWARD" is displayed, honoring Billy Mitchell. To the right, a laptop screen shows a website. A small figurine of a character is placed on the desk. A small trophy is also visible. The background includes a lamp and a framed picture.

A photograph of a desk setup. In the foreground, a framed certificate titled "THE PLAYER OF THE CENTURY AWARD" is displayed, honoring Billy Mitchell. To the right, a laptop screen shows a website. A small figurine of a character is placed on the desk. A small trophy is also visible. The background includes a lamp and a framed picture.

[illegible][illegible]

NUMBER OF LINES IN THE LETTER

Purported Modified

Total: 17 lines



IVGHOF.jpeg

Purported Original

Total: 15 lines



Mall of America Plaque [Walter Day].jpeg

EXHIBIT 3



Mitchell v Twin Galaxies

FORENSIC COMPARATIVE ANALYSIS



PNG image_1.png



PNG image.png



PNG image_3.png



Plaque on Striped Background.pdf



IVGHOF.jpeg



Video Game Documentary- CHASING GHOSTS (2006).Still001.tif

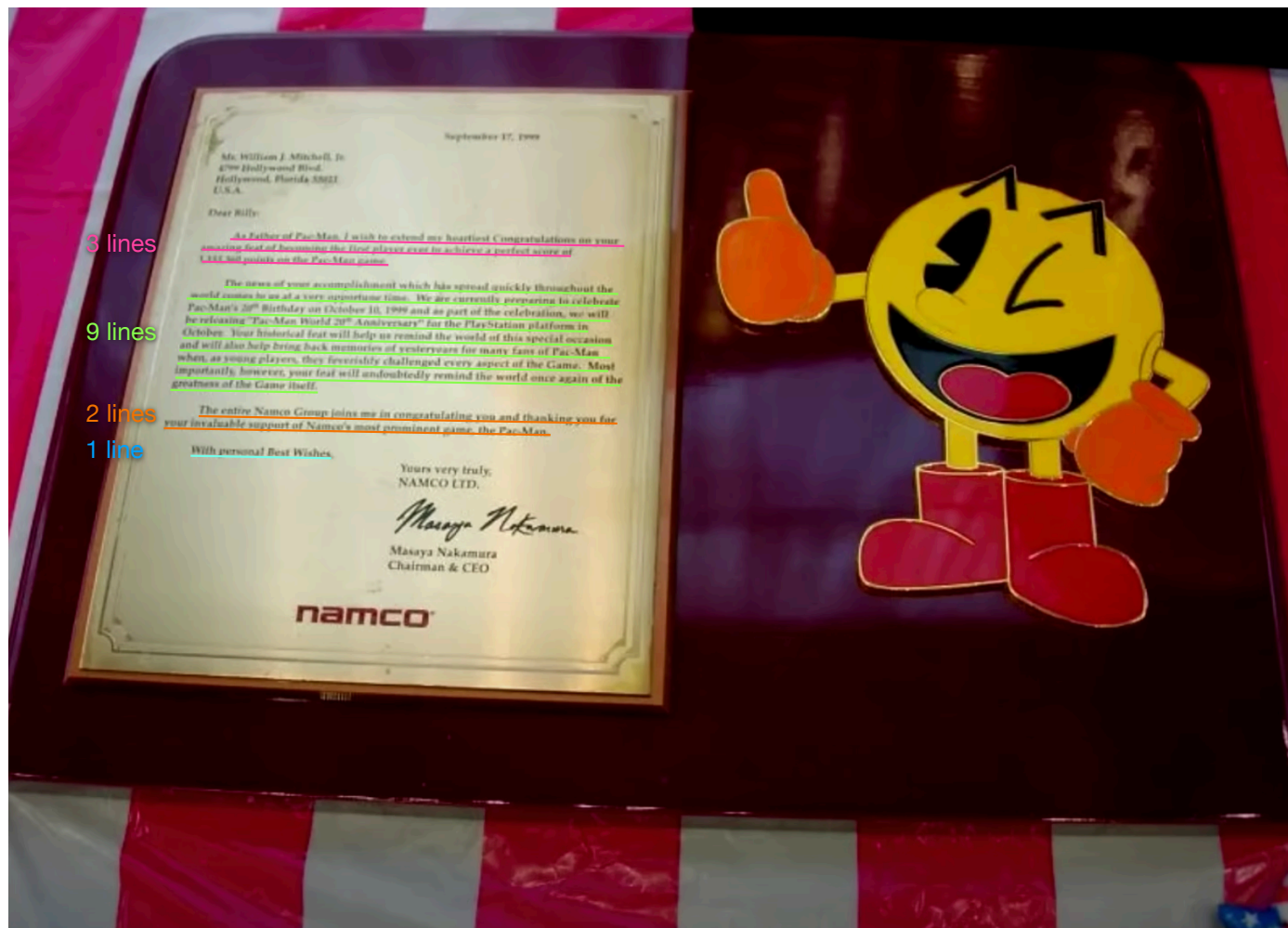
NUMBER OF LINES IN THE LETTER

Total: 15 lines



PNG image.png

Total: 15 lines



September 17, 1989

Mr. William J. Mitchell, Jr.
1989 Hollywood Blvd.
Beverly Hills, CA 90210
U.S.A.

Dear Mr. Mitchell:

As Chairman of Namco, I wish to extend my heartfelt appreciation to you and your staff for the outstanding quality of the products you have provided to the President's Quality Award program.

The award is a great honor and a great achievement. It is a testament to the quality of the products you have provided to the President's Quality Award program. It is a testament to the quality of the products you have provided to the President's Quality Award program.

The award is a great honor and a great achievement. It is a testament to the quality of the products you have provided to the President's Quality Award program. It is a testament to the quality of the products you have provided to the President's Quality Award program.

With personal Best Wishes,

Very truly yours,
NAMCO LTD.

George H. W. Bush
George H. W. Bush
Chairman & CEO

namco

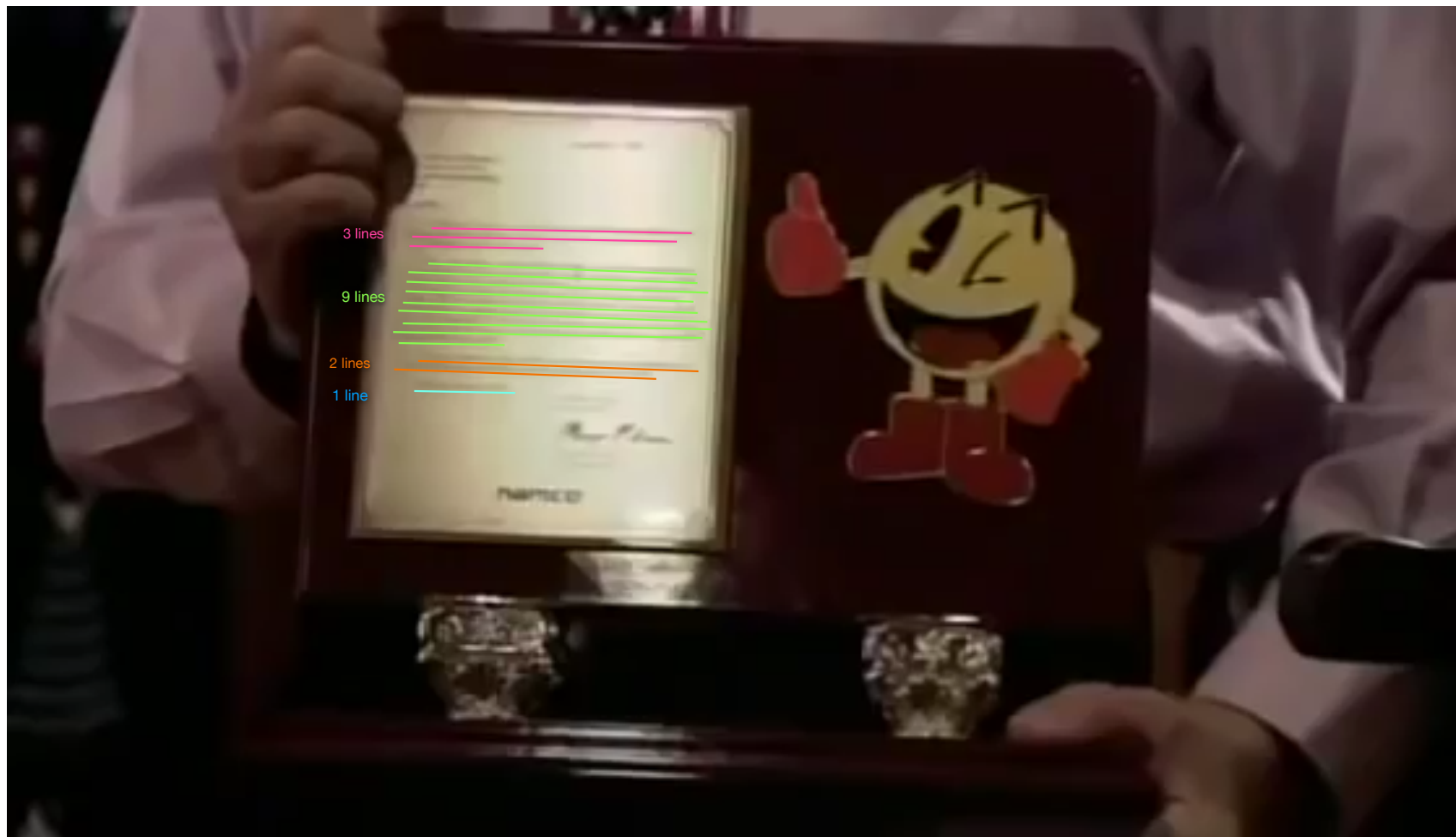
6

Total: 15 lines



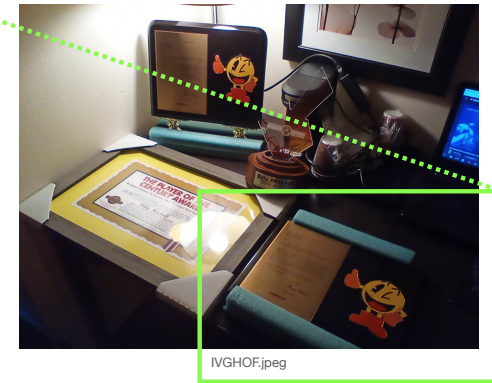
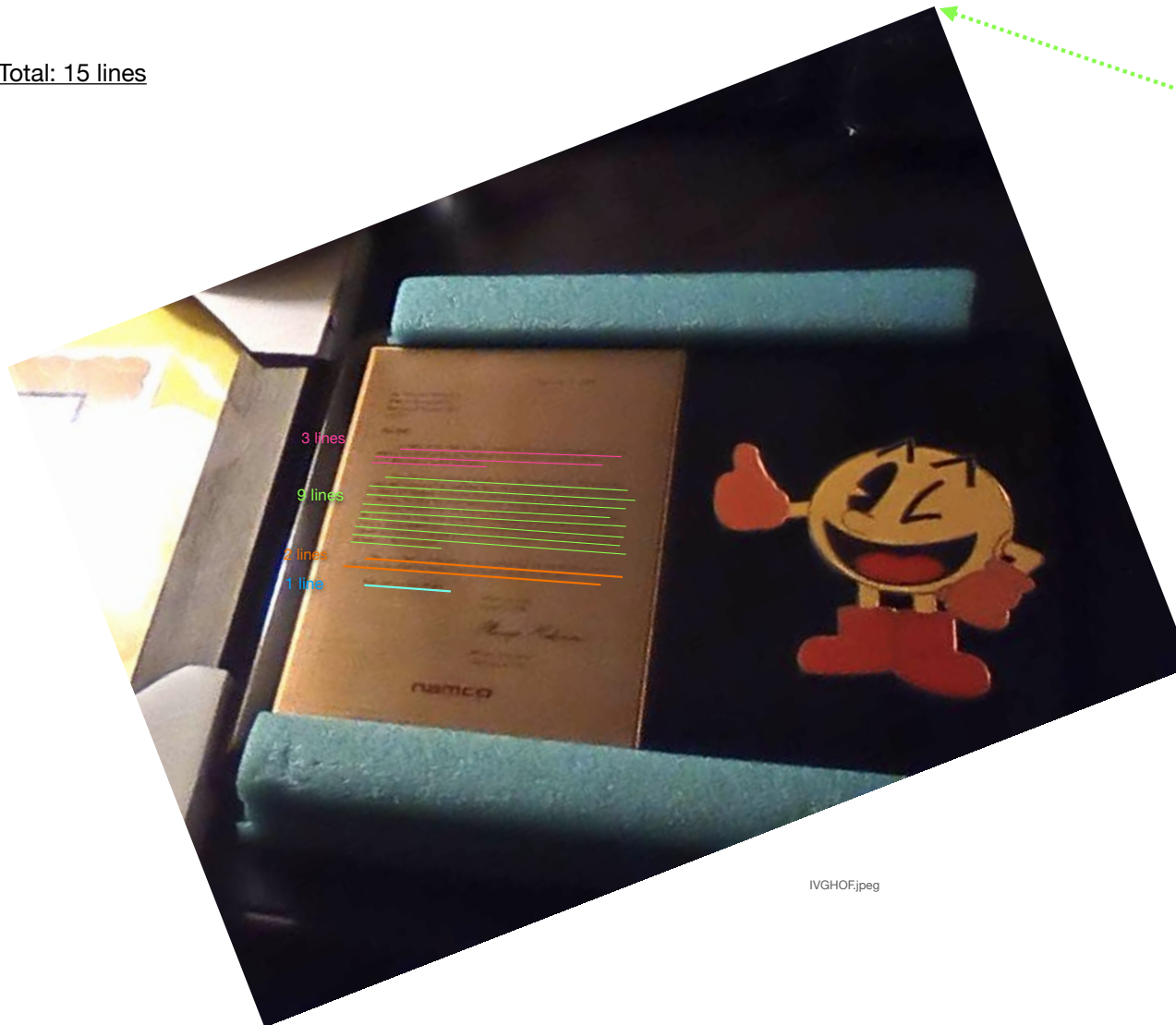
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Video Game Documentary- CHASING GHOSTS (2006).Still001.tif

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IVGHOF.jpeg



IVGHOF.jpeg

PROOF OF SERVICE

Case No. 19STCV12592

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is **TASHROUDIAN LAW GROUP, APC**, located 12400 Ventura Blvd., Suite 300, Studio City, California 91604. On September 5, 2023, I served the herein described document(s):

DECLARATION OF MATTHEW "MOTTI" GABLER

by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.

by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Woodland Hills, California addressed as set forth below.

X E-File - by electronically transmitting the document(s) listed above to tony.ellrod@manningkass.com & rwc@robertwcohenlaw.com pursuant to an agreement of the parties.

by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

by overnight courier of the document(s) listed above to the person(s) at the address(es) set forth below.

Anthony J. Ellrod *tony.ellrod@manningkass.com*
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Attorneys for Cross-Defendant
WALTER DAY

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on September 6, 2023 at Woodland Hills, California.



Mona Tashroudian