

In the matter of an arbitration  
under the Rules of Arbitration of  
the International Centre for  
Settlement of Investment Disputes

Case No. ARB/14/22

ICC Hearing Centre  
112, avenue Kléber  
Paris, 75016  
France

Day 1 Monday, 26th March 2018  
Hearing on Forensic Expert Evidence

Before:

PROFESSOR GABRIELLE KAUFMANN-KOHLER  
PROFESSOR ALBERT JAN VAN DEN BERG  
PROFESSOR PIERRE MAYER

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(1) BSG RESOURCES LIMITED  
(2) BSG RESOURCES (GUINEA) LIMITED  
(3) BSG RESOURCES (GUINEA) SÀRL

Claimants

-v-

THE REPUBLIC OF GUINEA

Respondent

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JAMES LIBSON, KAREL DAELE, KATY COLTON, JENNY HINDLEY and  
MOHAMMED NAZEER, of Mishcon de Reya LLP, and DAVID BARNETT,  
of Barnea & Co, appeared on behalf of the Claimants.

MICHAEL OSTROVE, SCOTT HORTON and THÉOBALD NAUD, of  
DLA Piper, and LAURENT JAEGER, YANN SCHNELLER and AGNÈS  
BIZARD, of Orrick, appeared on behalf of the Respondent.

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Secretary to the Tribunal: BENJAMIN GAREL  
Assistant to the Tribunal: MAGNUS JESKO LANGER

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09:59 1 Monday, 26th March 2018  
 2 (9.59 am)  
 3 THE PRESIDENT: Good morning to everyone. I am pleased to  
 4 open this hearing, and you will excuse us for having  
 5 kept you waiting while we were discussing the different  
 6 communications we received overnight.  
 7 Let me first proceed with the introductions. For  
 8 the record, we have the Tribunal, and you know the  
 9 Tribunal: Professor van den Berg on my right,  
 10 Professor Mayer on my left. We have the Secretary of  
 11 the Tribunal on my far right and the Assistant on my far  
 12 left.  
 13 We have many participants in this hearing. To  
 14 facilitate things, can we simply refer to the list of  
 15 attendants we have? Is there someone who appears on the  
 16 list who is not present now? That might be an easier  
 17 way of proceeding.  
 18 Yes, Mr Libson.  
 19 MR LIBSON: Mr Peters is not here today --  
 20 THE PRESIDENT: Of BDO?  
 21 MR LIBSON: -- of BDO, but he will be here tomorrow. And  
 22 Mr Cohen is here today but he won't be here tomorrow.  
 23 THE PRESIDENT: Good, thank you.  
 24 Can we do the same thing on the Respondent's side?  
 25 MR OSTROVE: (Interpreted) Yes, on the Respondent's side

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10:04 1 The idea would be to give a short time to the  
 2 Claimants first -- five minutes would be appropriate,  
 3 the Tribunal thinks -- and then the same time for the  
 4 Respondent. The Tribunal will then retire and tell you  
 5 how we wish to proceed.  
 6 MR LIBSON: Thank you, Madam President. I hope five minutes  
 7 is enough, because we feel as if we have been put under  
 8 very significant prejudice by the developments of last  
 9 night.  
 10 To illustrate our difficulties, until now, this is  
 11 the only copy of the material that we got. We received  
 12 the material on our mobile devices last night and  
 13 managed to persuade the hotel to print them off for us.  
 14 As you know, there's over 137 pages of material; we have  
 15 a single copy between us that we've had to use both for  
 16 our points this morning and for Mr Radley to consider.  
 17 And we haven't had a proper consideration of those;  
 18 we've made some very preliminary points.  
 19 We received the email from Mr Garel last night which  
 20 said it contains only information and data on the  
 21 record, and this material clearly doesn't. On the  
 22 briefest of perusals of this material, there are very,  
 23 very substantial volumes of new material.  
 24 If you look at the format of one of the documents,  
 25 it is in fact a report, it's not a presentation. It is

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10:01 1 Ms Bounfour, Mr Chahid-Nourai, Mr de Kersauson and  
 2 Ms Depaolini are not in this room this morning.  
 3 THE PRESIDENT: (Interpreted) Perfect, thank you.  
 4 (In English) As you know, this hearing is devoted to  
 5 the authenticity of the disputed documents, and that has  
 6 been divided into subtopics, if I can say so: the  
 7 disqualification of the Tribunal experts and the  
 8 admissibility of their report on the one hand, and the  
 9 substance of that report on the second. It goes without  
 10 saying that entering into the second point, which is the  
 11 substance, does not prejudge the first one, as was set  
 12 out in PO17. The rules for proceedings are found in  
 13 PO17 and PO1.  
 14 Of course, we do know that we received last night  
 15 a request from the Claimants to defer this hearing, and  
 16 we have taken note of the reasons for such request. We  
 17 have also seen the objection of the Respondent.  
 18 What we suggest to do now is to give each party  
 19 a brief opportunity to expand or otherwise explain its  
 20 position in this respect. I would first give the floor  
 21 to the Claimants, if you wish to add anything to your  
 22 quite detailed request, which was filed on Sunday at  
 23 23.27. And when I refer to the Respondent's objection,  
 24 I refer to the communication sent today at 075 (sic), so  
 25 we are clear for the record.

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10:05 1 a report: it's in a report format, it is written with  
 2 narrative and with argument in it, and all of the  
 3 argument, every single word in the argument is new. It  
 4 is new material, it is rebuttal argument. It is not  
 5 only information and data on the record. That is new,  
 6 as is much of the material in the presentations as well.  
 7 The presentations contain two sorts of material:  
 8 they contain argument as well, but they also contain new  
 9 formulations of the material on the record that we  
 10 haven't seen before, that is technical in --  
 11 THE PRESIDENT: When you speak of the "presentations", you  
 12 speak of the two PowerPoint presentations?  
 13 MR LIBSON: Yes.  
 14 THE PRESIDENT: As opposed to what seems to be talking  
 15 points?  
 16 MR LIBSON: I don't think it's talking points; it is  
 17 actually a report.  
 18 So it's not only information and data on the record.  
 19 The diagrams themselves are not on the record: they are  
 20 new formulations of the material that we have had.  
 21 We are not equipped, nor have we come ready to the  
 22 hearing to argue our case based on the new material. We  
 23 have prepared ourselves to deal with the final report.  
 24 The whole scheme that you have organised was that the  
 25 final report was the document that we came here to argue

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10:06 1 about.  
 2 Everyone had an opportunity to contribute to the  
 3 final report by submitting questions, and we submitted  
 4 many questions, for which we were criticised both by the  
 5 Tribunal-appointed experts and by Guinea's  
 6 representatives. Every single question -- with the  
 7 exception of four, I think -- was ignored, and was  
 8 treated actually with disdain by the Tribunal-appointed  
 9 experts. Every single one of those questions covers  
 10 material that the Tribunal-appointed experts have now  
 11 decided that they need to address. They had the  
 12 opportunity to do so within the scheme that you had  
 13 designed, and they failed to do that.  
 14 The material requires very, very significant  
 15 rebuttal. It requires not only rebuttal that we can do  
 16 on the spot; it requires Mr Radley to go back to his  
 17 laboratory and his office, to look at the material in  
 18 laboratory conditions, to be able to look at his  
 19 academic materials, to be able to respond. It requires  
 20 a significant amount of time to respond to, if it's to  
 21 be done fairly.  
 22 Let me just give you three examples of some of the  
 23 new material.  
 24 There is a debate in the material, as you will have  
 25 seen, between differences and variations. We asked in

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10:07 1 our questions exactly on this issue. I'm going to read  
 2 it to you. We asked:  
 3 "Paragraph 7.12.5 of the SWGDOC Standard for  
 4 Examination of Handwritten Items states that there is  
 5 a need to 'Evaluate the similarities, differences, and  
 6 limitations. Determine their significance individually  
 7 and in combination' ... This suggests that a signature  
 8 is shown to be genuine not by similarities, but by the  
 9 lack of ... differences. In line with this,  
 10 Albert S. Osborn, a leading authority ..."  
 11 A name you may recognise now:  
 12 "... in document examination, states that 'if the  
 13 conclusion of identity is reached ... in handwriting,  
 14 there must not remain significant differences that  
 15 cannot reasonably be explained'.  
 16 And we asked the direct questions:  
 17 "Do the Experts accept the Osborn approach? If so,  
 18 please identify and further detail any differences which  
 19 have been identified between the signatures on the  
 20 Disputed Documents and those in the comparator documents  
 21 ... and the significance placed on such differences."  
 22 And the answer was:  
 23 "The basis for all the handwriting conclusions in  
 24 the [Preliminary Report] follow methods, instruments and  
 25 procedures employed in each analysis that are generally

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10:09 1 accepted within the scientific community. Any properly  
 2 trained and competent forensic document examiner should  
 3 arrive at the same or similar conclusions, based on the  
 4 reasons and bases provided, in addition to reviewing the  
 5 appropriate image files supplied with the [Preliminary  
 6 Report]. All handwritten examinations were reviewed  
 7 technically by another ... Examiner for technical  
 8 accuracy of the methods ... In addition, the  
 9 Respondent's expert who is another ... Forensic ...  
 10 Examiner finds the [Preliminary Report] thorough and  
 11 comprehensive ...", et cetera.  
 12 So there is no engagement whatsoever with the issue  
 13 of variations and differences. In fact, variations  
 14 aren't even mentioned in the Reply. Yet now we have  
 15 page after page after page debating the very subject  
 16 that we asked them about in our preliminary questions.  
 17 Each of those --  
 18 THE PRESIDENT: For the interpreters, you speak too quickly  
 19 when you read. So next time you read, please remember.  
 20 MR LIBSON: Okay, sorry.  
 21 Each of those differences requires an examination of  
 22 the difference to determine whether what is  
 23 characterised as a variation is a difference. It's  
 24 an entirely new debate that has entered into this  
 25 experts' exchange just last night, even though we wanted

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10:10 1 to have that debate earlier on. But it requires  
 2 an examination of each and every one of the differences  
 3 or the variations that the Tribunal-appointed experts  
 4 pointed out by Mr Radley.  
 5 If you look at the Lev Ran signature that the  
 6 Tribunal experts have now pointed out, which again we  
 7 asked about, this is a completely new presentation.  
 8 This is one of very many; I just wanted to point it out  
 9 to you. (Pause)  
 10 I will hold it up in a second, but it's one of very  
 11 many examples that we need to return to and we need to  
 12 analyse properly. It's a new presentation of the  
 13 signature that we haven't seen before. It relies on  
 14 measurements that we are now not able to do in order to  
 15 rebut because Mr Radley needs to look at those in  
 16 laboratory conditions.  
 17 It's this slide (indicating). We don't have  
 18 a page-numbered version of this. You can see at the  
 19 bottom here "similar lengths", and we disagree that  
 20 those are similar lengths, but we can't make the  
 21 argument in relation to similar lengths without having  
 22 the ability to measure them.  
 23 MR OSTROVE: Excusez-moi -- (In English) sorry, I'll say it  
 24 in English. Could you just show us the page you're  
 25 referring to so we can know what you are talking about?

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10:12 1 There is text on the bottom?  
2 MR LIBSON: "Similar length". It says "R-24" at the top,  
3 and C --  
4 MR OSTROVE: We have found it, thank you.  
5 THE PRESIDENT: Could you take a picture of the slide?  
6 Otherwise we don't know what you're -- could you hold it  
7 up again so the Secretary can make a picture of this?  
8 (Pause)  
9 Thank you. You may continue.  
10 MR LIBSON: This is one example of an analysis that would  
11 take several hours, just of this page, for us to be able  
12 to rebut. And there is page after page after page of  
13 exactly the same sort of presentation of material,  
14 presented in an entirely new way on the eve of the  
15 hearing. We are not able to deal with it, and it would  
16 cause us severe prejudice if this hearing went ahead on  
17 the basis that this evidence was on the record.  
18 I can point again to where we asked in our questions  
19 on the preliminary report in relation, for example, to  
20 the Lev Ran signatures. We asked about the Lev Ran  
21 signatures, and the reply was:  
22 "Our findings and conclusions are based on examining  
23 all of the handwriting characteristics and their  
24 appropriate significance in combination. Therefore, no  
25 changes or edits will be incorporated into the Final

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10:13 1 Report based on this query."  
2 If you've read the answers to the questions, which  
3 are at appendix L to the final report, you will see  
4 appearing as a mantra the phrase "Therefore, no changes  
5 or edits will be incorporated into the Final Report  
6 based on this query". And now what we have are probably  
7 hundreds of changes and edits that are being sought to  
8 be incorporated into the final report by the back door  
9 on the very eve of this hearing.  
10 A final point I want to just make on the  
11 presentations is that in the presentations there is  
12 a ad hominem attack on the character and standard of  
13 evidence of Mr Radley. Throughout the presentation his  
14 arguments are characterised as a "significant  
15 mischaracterisation", "significantly misleading  
16 statement", and let me just read out one longer quote:  
17 "This reveals that this characteristic is not  
18 a difference and that Mr Radley clearly discounted and  
19 misinterpreted the significance of the evidence in his  
20 evaluation. It appears from his comments that in  
21 pursuit of the opposite proposition of these signatures  
22 being simulated forgeries by a master forger, it has  
23 clouded the judgement regarding the significant  
24 characteristics of genuineness."  
25 Mr Radley must have an opportunity properly of

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10:15 1 responding to these ad hominem attacks, not in the  
2 witness-box on cross-examination, not with no notice,  
3 but with having sufficient time to go through all of the  
4 material that has now been presented to us at the last  
5 minute.  
6 MR DAELE: Can we also show the slide where the picture of  
7 the -- (Handed)  
8 THE PRESIDENT: Yes, please. So this would be picture 2,  
9 right?  
10 MR LIBSON: Madam President, you mentioned that this third  
11 document, not the PowerPoint document, were reading  
12 notes.  
13 THE PRESIDENT: Yes.  
14 MR LIBSON: But they're clearly not reading notes, and  
15 I just want to take you through the structure of this  
16 document.  
17 The document, as you can see, I think, if you've got  
18 it in front of you --  
19 THE PRESIDENT: No, we don't, on purpose.  
20 MR LIBSON: The document starts with a one-and-a-half-page  
21 introduction in narrative form (indicating). It then  
22 goes through a series of arguments illustrated by  
23 illustrations. As you can see, if I can just take you  
24 through the first four pages, the first topic is --  
25 THE PRESIDENT: I should just say for the record: I said we

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10:16 1 don't have it, and we don't have it on purpose, we have  
2 not reviewed it, because we understand that it is being  
3 disputed.  
4 MR LIBSON: So I'm not asking you to review it, I'm asking  
5 you just to look at it from a distance so you can see  
6 its format, so that you can see it's not reading notes.  
7 As you can see, it is narrative, illustrated by new  
8 materials -- some of them new materials -- and then  
9 argument. So what you have here is -- and the format is  
10 Mr Radley's paragraph, and then it says "Author's  
11 Response", and then you have the author's response.  
12 Much of the new material, in passing, is based  
13 on ... (Pause) Yes, so the very first sentence, as  
14 Mr Daele just points out, says:  
15 "The following information and images are provided  
16 based on statements that Mr ... Radley makes in regard  
17 to the handwriting conclusions offered in our report..."  
18 And then you've got the narrative. So it isn't even  
19 presented as talking notes.  
20 Much of the new material, by the way, in relation to  
21 handwriting is based on the academic research of a man  
22 called Mr Osborn: that's the man that we specifically  
23 asked in our questions about, and whether they accepted  
24 Mr Osborn's approach. Those questions were just  
25 rejected. And now, as you will have seen over the

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10:18 1 weekend and on Friday, a lot of material has come in.  
 2 This is all Mr Osborn's authority; not all, but a lot of  
 3 it is on the authority of Mr Osborn. Again, all of this  
 4 could have been dealt with weeks ago.  
 5 I just want to turn to the prejudice and I want to  
 6 turn to the abuse. I also just want to -- because  
 7 I didn't realise until you just made it clear,  
 8 Madam President, that you hadn't seen the material. In  
 9 the email from Mr Garel last night, the email said in  
 10 terms that it contained only information and data on the  
 11 record. So that information either came from Mr Garel's  
 12 assessment of the material that had come in or from the  
 13 information provided by the Tribunal-appointed experts.  
 14 Either way, it's wrong, and certainly in terms of if  
 15 it came from the Tribunal-appointed experts -- and it  
 16 may very well have, because I anticipate it came in at  
 17 the last moment -- it is absolutely wrong. We would be  
 18 interested to know exactly when it did come in, and the  
 19 chronology of how it then came to the parties.  
 20 If I can very quickly -- because I know I've overrun  
 21 my five minutes significantly -- if I can very quickly  
 22 turn to the prejudice.  
 23 We set out the prejudice in our note to you last  
 24 night. But this is a key issue in this arbitration.  
 25 It's an issue that we have canvassed between all of us

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10:20 1 for several months. We all came here prepared to fight  
 2 the case that had been prepared in accordance with the  
 3 directions set by the Tribunal, and we were happy to  
 4 fight that case.  
 5 We cannot go ahead on a basis where we have been  
 6 ambushed in the way that we have. It's simply unfair.  
 7 We're not prepared to fight the case; we don't have the  
 8 resources to do so. Even if we had the same amount of  
 9 lawyers on this side of the table as is on the other  
 10 side of the table, we wouldn't have the facility to  
 11 answer the material within the two-day hearing;  
 12 Mr Radley wouldn't have the facility and we wouldn't  
 13 have the facilities to do so. There's vast amounts of  
 14 new material. None of this was necessary.  
 15 Let me just say one other point on prejudice. And  
 16 we said in our note last night we say it hesitatingly,  
 17 because it wouldn't be something that we would say  
 18 without proper inspection of the material in front of  
 19 us, but we just haven't had an opportunity. We think  
 20 some of the material that has now been put on the  
 21 record, some of the diagrams that have now been put on  
 22 the record, may tend to mislead the Tribunal and may  
 23 misrepresent the position.  
 24 That a hearing should go ahead on this basis, let  
 25 alone if the material was legitimate, where there is

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10:21 1 a possibility that material provided in an ambush is  
 2 misleading, cannot happen. The Tribunal's duty must be  
 3 to protect the ambushed and not to allow the ambusher to  
 4 profit from his conduct, especially when some of the  
 5 material may be suspect and we have not had a chance to  
 6 scrutinise it properly. The Tribunal's duty is to  
 7 ensure fair process, and none of what has happened over  
 8 the last 12 hours is fair. But to allow misleading  
 9 material on to the record would be an unacceptable  
 10 double jeopardy.  
 11 I must say we are very, very concerned with the  
 12 developments of the last 12 hours. We're very worried  
 13 on behalf of our client and the fair process that may or  
 14 may not happen during the next of the 48 hours.  
 15 Those are my submissions.  
 16 THE PRESIDENT: Thank you.  
 17 (Interpreted) Now I give the floor to the  
 18 Respondent.  
 19 MR OSTROVE: (Interpreted) Thank you, Madam President.  
 20 We started last year in May, nearly ten months ago,  
 21 during the hearings on the substance in this particular  
 22 case, by saying that it was an extraordinary case, with  
 23 evidence of corruption that was equally extraordinary.  
 24 The disputed contracts or documents are one part of this  
 25 extraordinary evidence, and the report by the

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10:23 1 Tribunal-appointed experts just added to the  
 2 appreciation of the said evidence. But since then, BSGR  
 3 has never stopped trying to derail the procedure with  
 4 a set of procedural manoeuvres that should not be  
 5 accepted.  
 6 We shall talk about this in our closing pleadings  
 7 and the request for challenge against the experts, an  
 8 attempt by BSGR. But now we have this latest attempt,  
 9 which is based on premises that are total erroneous,  
 10 i.e. that the documents that were communicated last  
 11 night by the Tribunal-appointed experts comprise new  
 12 material. This is absolutely unfounded.  
 13 BSGR is in fact carrying out a confusion between  
 14 demonstrative exhibits and the devices used for the  
 15 presentation of the experts. The demonstrative exhibits  
 16 were to be submitted on the day before the hearing, at  
 17 the latest at 6 o'clock. We don't know what time they  
 18 actually did submit these exhibits. We know that it was  
 19 put on to Box at a later stage and communicated to the  
 20 parties, presumably taking a little amount of time.  
 21 But what are these demonstrative exhibits? It's  
 22 very clear, Procedural Order 17 at paragraph 19: as  
 23 usual, it's a compilation of existing information  
 24 already submitted in the case, but presented in  
 25 a different form. This is what appears under

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10:25 1 paragraph 19 of the PO:  
 2 "The Experts ... may use demonstrative exhibits  
 3 (such as charts, tabulations, etc. compiling information  
 4 which is on record but not presented in such form) ..."  
 5 What was presented last night by the experts, in  
 6 compliance with the Tribunal's PO, is precisely that:  
 7 pictures of the signatures, which are the exhibits in  
 8 the proceedings, with arrows or indications that are the  
 9 presentation of this information in a different form.  
 10 They are not novel exhibits; they are typically  
 11 demonstrative. And it's the work of the experts. All  
 12 of the experts have prepared pictures and documents,  
 13 with arrows and so forth: this is the substrate that  
 14 they intend to use when they present their position.  
 15 The examples that were quoted a moment ago by my  
 16 colleague Mr Libson are exactly that. If experts take  
 17 two examples and say there are similar lengths, it's  
 18 merely that they took documents that were amongst the  
 19 submitted exhibits.  
 20 I will come back to the need of their experts to go  
 21 back to their labs to measure all this, et cetera,  
 22 I will come back to this in a moment, because this type  
 23 of argument would lead us -- each time an expert during  
 24 an examination on disputed documents was to say, "You  
 25 see, this is quite similar", we'd have to stay the

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10:27 1 proceedings so that all of the experts may go back home  
 2 to their labs and proceed to their measurements. This  
 3 is totally exaggerated and it goes beyond ridicule.  
 4 Next to this, as to the possibility for the parties  
 5 to comment on these documents within the two days, well,  
 6 first, experts are precisely experts who are accustomed  
 7 to this type of exercise. They should be capable, if  
 8 they've studied the file and looked at all of the  
 9 elements, they should be able to answer these questions.  
 10 And I daresay that the closing statements tomorrow  
 11 are not supposed to deal with the authenticity of the  
 12 documents but the questions of challenges. I think  
 13 there will be post-hearing briefs, if I've understood  
 14 rightly, and then the parties will have an opportunity  
 15 to make their comments. This is paragraph 13 of PO17,  
 16 which invites the parties to deal with the questions of  
 17 admissibility and challenge, rather than authenticity.  
 18 If we are mistaken, I would ask you,  
 19 Madam President, to correct me, because we didn't intend  
 20 to plead on authenticity.  
 21 THE PRESIDENT: (Interpreted) No, it was implicit that there  
 22 would be post-hearing briefs on the question of  
 23 authenticity; to be defined, of course, according to the  
 24 decision on the disqualification.  
 25 MR OSTROVE: (Interpreted) Thank you, Madam President.

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10:29 1 Indeed.  
 2 So if there are questions of measurements and so  
 3 forth that the parties want to launch into in the  
 4 post-hearing briefs, I imagine with their expert, if  
 5 BSGR sees that something was misleading during the  
 6 hearing, they will have ample opportunity to say so.  
 7 What is the real [complaint] of BSGR? It is not  
 8 that there is new information, but new arguments. They  
 9 are in fact mere answers to items that were raised.  
 10 That's what you expect from a demonstrative exhibit, and  
 11 that's what you expect from the presentation of experts  
 12 this morning; that is, to meet all of the criticisms and  
 13 explain their points of view. This is why we are here.  
 14 There are PowerPoints and there's a PDF. The PDF is  
 15 presented in a form which, as we see it, is equivalent  
 16 to slides. It proceeds point by point to follow the  
 17 presentation that the experts can make this morning:  
 18 Mr Radley's criticisms, a summary of their answer.  
 19 Together with the demonstrative exhibits that are  
 20 integrated, this is just a substrate that helps everyone  
 21 to follow.  
 22 BSGR should feel happy to have received that last  
 23 night, rather than merely discovering it today,  
 24 discovering the answers of the experts. In terms of due  
 25 process, it just helps due process that such a document

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10:31 1 should have been submitted last night; it doesn't  
 2 imperil them.  
 3 This is the second item of the email by our  
 4 adversaries:  
 5 "This should have been presented by the expert in  
 6 a final report. Why did they wait for the hearing?"  
 7 Well, this is totally BSGR's fault and the fault of  
 8 their behaviour that this is the case. BSGR did not  
 9 play the game according to the rule. The idea was that  
 10 there would be a preliminary report, they were given two  
 11 weeks to make comments; at the request of BSGR, they  
 12 were given three weeks for their comments. If BSGR felt  
 13 that there were differences, they were to pinpoint these  
 14 differences that they saw in the signatures, and draw  
 15 the attention of the Tribunal experts so that they may  
 16 integrate their answer in their final report.  
 17 Did BSGR do that? Not in the least. In their  
 18 questions to the Tribunal they just asked, on several  
 19 occasions, and more particularly after question 35:  
 20 (In English) "... please explain in further detail  
 21 what differences (if any) the Tribunal-appointed Experts  
 22 identified between the signature of Marc Struik on R-27  
 23 and those in the comparator documents and the relevance  
 24 of each point."  
 25 (Interpreted) And the answer of the experts was:

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10:32 1 (In English) "There is no evidence of any  
 2 differences that would suggest someone other than  
 3 Marc Struik signed the document."  
 4 (Interpreted) BSGR were asked if they saw any  
 5 differences, and they said no. And today what is BSGR  
 6 saying? That the experts today would have pinpointed  
 7 differences and tried to explain them. This is not at  
 8 all what the Tribunal experts did in this document.  
 9 They just take stock of variations and they explain why  
 10 these variations are not differences. This is what is  
 11 at stake in this exercise.  
 12 Why do they do this at this stage? It is because  
 13 instead of underlining these differences with the  
 14 support of Mr Radley in the comments on the preliminary  
 15 report, if there was an ambush, actually it's the  
 16 Tribunal-appointed experts who were ambushed two weeks  
 17 ago, with the 158 pages, if I remember correctly, of the  
 18 report by Mr Radley, who underlines for the very first  
 19 time the differences underlined by BSGR.  
 20 So what did BSGR think that the Tribunal-appointed  
 21 experts were going to do? Say simply, "Well, I'm sorry,  
 22 I have no additional report to make, so I'm not going to  
 23 answer these points"? No. We have this hearing today  
 24 basically so that the experts can answer this point.  
 25 And the fact that they provided a presentation as

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10:34 1 PowerPoints and demonstrative exhibits yesterday evening  
 2 is totally normal.  
 3 So we simply regret that BSGR waited until the very  
 4 last minute to underline these so-called "differences".  
 5 Would it have been easier for everybody if it had been  
 6 right after the preliminary report? Probably so, yes.  
 7 I am trying to reach the end of what I have to say  
 8 here.  
 9 Our colleague on the other side highlighted the  
 10 issue of the experts being impartial. This will be part  
 11 of the closing tomorrow. Without prejudging your  
 12 decision regarding these two days, I'm going to mention  
 13 a few things in that regard.  
 14 Mr Radley in his report said that the  
 15 Tribunal-appointed experts were misleading by repeating  
 16 some sentences without including a sentence he would  
 17 have liked to see.  
 18 It's not surprising that the Tribunal-appointed  
 19 experts answered that they think that some aspects of  
 20 Mr Radley's presentations are misleading: it's their  
 21 role. And the Tribunal will decide after hearing both  
 22 parties during this hearing, and after seeing the  
 23 post-hearing briefs.  
 24 BSGR seems very unhappy because the experts detected  
 25 some weaknesses in Mr Radley's report, but we will see

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10:36 1 that those weaknesses are quite obvious; the Republic of  
 2 Guinea actually detected them too.  
 3 It was rather easy for the parties and experts, who  
 4 know the file well, to read the documents that were  
 5 provided yesterday evening in just a few hours to assess  
 6 the various materials. There were no surprises. There  
 7 should have been no surprises for BSGR if they were well  
 8 prepared regarding the various materials in the file.  
 9 This is simply just another attempt to delay the  
 10 process. And I'd like here to note what BSGR probably  
 11 wants here. This whole thing started in 2011, and  
 12 I would like to note that there were two five-year  
 13 presidential terms in Guinea, so that after 2020 BSGR  
 14 could hope to have another president, another  
 15 government. So basically they are playing the clock.  
 16 If they manage to make the whole process last more than  
 17 ten years, then, yes, they could have a go with the next  
 18 government, which might not defend in the same way the  
 19 rights of Guinea.  
 20 I hope, Madam President and members of the Tribunal,  
 21 that you are not going to delay this proceeding until  
 22 another hearing, so that we end up waiting until 2021.  
 23 Thank you.  
 24 THE PRESIDENT: (Interpreted) Do my colleagues have some  
 25 questions at this stage? If it's not the case, I'd like

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10:38 1 to thank you for your explanations. The Tribunal is  
 2 going to discuss what to do next; we need some time for  
 3 that.  
 4 (10.39 am)  
 5 (A short break)  
 6 (10.59 am)  
 7 THE PRESIDENT: (In English) We are ready to resume. Before  
 8 I go on, I just note that the Secretary has handed  
 9 copies of the two PowerPoints, and I understand also of  
 10 the PDF document, to both parties. This is done as  
 11 a courtesy, and the Tribunal does not have these  
 12 documents, so there is clarity about this.  
 13 The Tribunal suggests that we proceed in the  
 14 following manner, having heard your explanations and  
 15 also read your written communications.  
 16 The Tribunal experts would first present their  
 17 report, without using the PowerPoint presentations and  
 18 without the PDF document. They would do this in  
 19 a shorter time than what we had provided, and they would  
 20 not go into the Claimants' submission that was filed, in  
 21 the form of Mr Radley's report.  
 22 We would then go over to questions, which questions  
 23 may or may not address matters that are covered in what  
 24 I will now call the "Radley submission", but it is  
 25 a Claimants' submission filed in the form of the content

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11:01 1 of Mr Radley's report. In answer to the questions, the  
 2 Tribunal experts may use one or the other of their  
 3 slides, to the extent that it is responsive to the  
 4 question that is being asked.  
 5 The Tribunal will make sure that at some point in  
 6 the hearing the Tribunal experts have an opportunity to  
 7 comment on the Radley submission. We had provided, in  
 8 any event, for some time towards the end of the hearing  
 9 for the concluding remarks by the Tribunal experts.  
 10 With respect to the status of the documents that the  
 11 Tribunal experts have prepared, we consider that the PDF  
 12 document is not in the record because there was no  
 13 provision for that type of document. With respect to  
 14 the two PowerPoint presentations, they are not in the  
 15 record at this stage, but they may come into the record  
 16 if, in answer to questions posed to them, the Tribunal  
 17 experts refer to one or the other slide. (Pause)  
 18 Thank you, yes, I should be more precise. It is not  
 19 the presentation that becomes part of the record; it is  
 20 the slide that is referred to that becomes part of the  
 21 record as a demonstrative exhibit, if it is  
 22 a demonstrative exhibit, or just as a slide if it --  
 23 yes, as a demonstrative exhibit.  
 24 Do my colleagues wish to add anything in addition,  
 25 to make sure that we have covered every point of the

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11:04 1 Tribunal's ruling?  
 2 Can we proceed? Are there questions on the  
 3 Claimants' side? Mr Daele?  
 4 MR DAELE: Yes, thank you, Madam President. We were hoping  
 5 to receive information as to the timing of the filing of  
 6 the documents by the experts yesterday, and --  
 7 THE PRESIDENT: Yes, we can certainly provide that. And?  
 8 MR DAELE: And we would also like to receive the  
 9 correspondence between the Tribunal and the Tribunal  
 10 experts. I refer to Article 8.5 (sic) of the IBA Rules  
 11 on the Taking of Evidence, that provides that parties  
 12 may examine the correspondence between the Tribunal and  
 13 Tribunal-appointed experts.  
 14 THE PRESIDENT: Yes. There was no correspondence between  
 15 the Tribunal and the Tribunal experts. The --  
 16 MR DAELE: For example, if I just may correct, for example,  
 17 there is a reference in the final report, in I think it  
 18 is paragraph 11, where the experts refer to their email  
 19 of 11th January in relation to the extension. We  
 20 haven't seen that email. So I assume there has been --  
 21 well, at least that paragraph suggests that there has  
 22 been correspondence between the experts and the  
 23 Tribunal. It's in the beginning of paragraph 11:  
 24 "As noted in our response on 11 January 2018 ..."  
 25 I don't think we have seen that response. I assume

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11:06 1 it was only addressed to the Tribunal. So this is  
 2 an example, I think, where at least it suggests the  
 3 existence of correspondence between the experts and the  
 4 Tribunal, and we would like to receive it.  
 5 THE PRESIDENT: Absolutely. We will review the record, so  
 6 that I don't answer like this without having checked.  
 7 We have been careful, as a general matter of principle,  
 8 to have the Secretary of the Tribunal dealing with the  
 9 correspondence with the experts, and the Tribunal itself  
 10 has not corresponded or had contact with the experts.  
 11 MR DAELE: Then I would ask to see the correspondence -- if  
 12 you make that distinction between the ICSID Secretary --  
 13 THE PRESIDENT: No, no, I understand your request and we  
 14 will check, of course, that.  
 15 The other question was the timing. Can I give the  
 16 floor to the Secretary so you explain the reason for the  
 17 two-hour delay last night.  
 18 MR GAREL: Yes, so I met with the experts for purposes of  
 19 them transferring the files to me; they couldn't go  
 20 through emails because of their size. So I met them at  
 21 their hotel, and there was some issue with the transfer  
 22 of documents to my computer and the connection of my  
 23 computer to the wifi in the hotel, because I'm not in  
 24 the same hotel, so I couldn't connect. They gave me the  
 25 files slightly late, after 6.30, around 6.30/6.40. And

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11:07 1 it took time for me to connect to the internet to upload  
 2 the documents, which were uploaded at 7.45, and then to  
 3 write to the parties to check that everything was there.  
 4 I sent the email at 8.09 and you received it then.  
 5 So that's the explanation.  
 6 MR DAELE: And may I ask who made the determination that  
 7 these documents did not include information that was not  
 8 on the record?  
 9 MR GAREL: So that wasn't an assessment, that was just  
 10 a reference to what PO17 says, and it was based on what  
 11 the experts told me when I reminded them of that  
 12 provision in PO17.  
 13 THE PRESIDENT: Questions from the Respondent?  
 14 MR OSTROVE: (Interpreted) Thank you, Madam President.  
 15 Regarding the communication with the experts, of  
 16 course we will let the Tribunal assess the situation.  
 17 I didn't understand the reference to Article 8.5 of  
 18 the IBA Rules, if you could check --  
 19 MR DAELE: It was 6.5, sorry. If you can double-check.  
 20 MR OSTROVE: Okay, thank you for the clarification.  
 21 MR DAELE: Sorry for that.  
 22 MR OSTROVE: (Interpreted) As for the decision of the  
 23 Tribunal about how to proceed, some practical questions,  
 24 if I may.  
 25 You indicated that the experts might have less time

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11:09 1 for their presentation. I think that it would be almost  
 2 impossible for them to make this presentation if they  
 3 cannot refer back to their slides, because to answer the  
 4 criticisms of BSGR, without prejudging what they are  
 5 going to say, I imagine they will need to refer back to  
 6 the demonstrative exhibit. If they simply repeat what  
 7 they said initially, without answering the questions  
 8 regarding the differences or variations that were  
 9 identified, which is really the main topic of their  
 10 presentation -- there is some visual support, visual  
 11 material, in their slides. But if their presentation is  
 12 much shorter, we would like then to have more time to be  
 13 able to ask them some questions, so that we can have  
 14 some explanations in their answers to the comments made  
 15 by the Claimants.  
 16 (Pause to resolve a technical problem)  
 17 THE PRESIDENT: Let's try, and hope that the microphones  
 18 will work.  
 19 In answer to the Respondent's points, the ruling is  
 20 that the Tribunal experts should present their report as  
 21 they have drafted it, the methods they used,  
 22 conclusions, without reference to the critique by the  
 23 Claimants; and that can then be addressed, if deemed  
 24 appropriate, in questions. And if more time is needed,  
 25 then we will allow more time, as long as we keep within

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11:14 1 reasonable bounds and can complete our programme by  
 2 tomorrow night.  
 3 Is this clear, so we have no misunderstandings about  
 4 what we are doing here? On the Respondent's side?  
 5 MR OSTROVE: (Interpreted) I'm not going to express our  
 6 position on this decision right now, because I think we  
 7 might have a problem regarding due process, as there is  
 8 a submission of the Tribunal experts, in their  
 9 presentation they won't be able to answer the  
 10 criticisms, they have to review the whole report,  
 11 whereas really the point today was to hear their answers  
 12 to these criticisms.  
 13 Something else I had forgotten when we had these  
 14 problems with the microphones actually: the experts'  
 15 slides, are they going to be part of the file? And  
 16 I was wondering how we proceed. Usually, when there is  
 17 someone who hands slides to the material as support  
 18 material, I imagine it's not part of the proceedings,  
 19 it's simply submitted.  
 20 So I didn't understand the decision of the Tribunal  
 21 regarding the status of these slides, as they were  
 22 referenced to by the Tribunal experts. I understand if  
 23 there are some slides for which there is no reference,  
 24 it's not part of the file. But if they refer back to  
 25 slide 5, is it included only for the demonstrative

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11:16 1 exhibit, or will the Tribunal and the parties have the  
 2 right to refer back to these elements?  
 3 THE PRESIDENT: (Interpreted) The decision of the Tribunal  
 4 was that the PDF is not part of the record; that the  
 5 PowerPoint presentations as such, and for the time  
 6 being, are not part of the record. If one expert in  
 7 answer to a question refers to a slide, he can do so,  
 8 and then that slide is in the record.  
 9 MR OSTROVE: (Interpreted) Thank you, Madam President.  
 10 THE PRESIDENT: (In English) The experts said that they  
 11 needed some time, because now they are actually asked to  
 12 do something they had not prepared for. So when will  
 13 they be ready?  
 14 MR GAREL: I will check. (Pause)  
 15 THE PRESIDENT: The experts say that they will be ready in  
 16 five minutes. So we have a five-minute break.  
 17 (11.18 am)  
 18 (A short break)  
 19 (11.25 am)  
 20 MR GERALD LAPORTE (called)  
 21 MR TODD WELCH (called)  
 22 THE PRESIDENT: Good morning, gentlemen.  
 23 MR WELCH: Good morning.  
 24 MR LAPORTE: Good morning.  
 25 THE PRESIDENT: It's nice to meet you. We are sorry we kept

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11:28 1 you waiting so long before we could start hearing you.  
 2 For the record, Mr Welch, can you please confirm  
 3 that you are Todd Welch?  
 4 MR WELCH: Yes, I can.  
 5 THE PRESIDENT: You are a forensic document examiner?  
 6 MR WELCH: Yes, I am.  
 7 THE PRESIDENT: Mr LaPorte, you can confirm that you are  
 8 Gerald LaPorte?  
 9 MR LAPORTE: I confirm that I am Gerald LaPorte.  
 10 THE PRESIDENT: You are a forensic chemist, a document  
 11 dating expert?  
 12 MR LAPORTE: Yes, madam.  
 13 THE PRESIDENT: And you are both with the firm Riley Welch  
 14 LaPorte; is that right?  
 15 MR WELCH: That's correct.  
 16 MR LAPORTE: Yes.  
 17 THE PRESIDENT: So on the request of the Tribunal, you have  
 18 established a report that you have submitted to us,  
 19 dated 12th February 2018?  
 20 MR LAPORTE: Correct.  
 21 THE PRESIDENT: Who wants to take the lead when I ask  
 22 questions that are directed to both? It might be easier  
 23 that just one of you responds.  
 24 MR LAPORTE: I'll take the lead.  
 25 THE PRESIDENT: Good. You are acting, and have acted so

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11:30 1 far, under terms of reference that were dated  
 2 24th October 2017?  
 3 MR LAPORTE: Yes.  
 4 THE PRESIDENT: Under these terms, you carried out  
 5 a document inspection?  
 6 MR LAPORTE: Correct.  
 7 THE PRESIDENT: Under a protocol that was sent to the  
 8 parties on 26th October 2017, and that document  
 9 inspection took place from 31st October to  
 10 3rd November 2017?  
 11 MR LAPORTE: Yes, ma'am, that's correct.  
 12 THE PRESIDENT: You are both heard as expert witnesses in  
 13 this arbitration. As an expert witness, you have a duty  
 14 to make only such statements that are in accordance with  
 15 your sincere belief. Can you please, each of you, read  
 16 into the record the expert declaration that should be on  
 17 the table in front of you. Is it there?  
 18 MR LAPORTE: Okay. I solemnly declare upon my honour and  
 19 conscience that my statement will be in accordance with  
 20 my sincere beliefs.  
 21 THE PRESIDENT: Thank you. Mr Welch?  
 22 MR WELCH: Yes, Todd Welch. I solemnly declare upon my  
 23 honour and conscience that my statement will be in  
 24 accordance with my sincere beliefs.  
 25 THE PRESIDENT: Thank you. Now, you have your laptops in

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11:31 1 front of you. I understand that on these laptops you  
 2 have your report; is that what it is?  
 3 MR LAPORTE: I have my report in front of me, yes.  
 4 THE PRESIDENT: Yes. Mr Welch?  
 5 MR WELCH: I have it likewise.  
 6 THE PRESIDENT: Fine. And you see what we now see on the  
 7 screen, or you see up there and we see here in front of  
 8 us?  
 9 MR LAPORTE: Yes, that's correct.  
 10 THE PRESIDENT: Fine. We would assume that you continue  
 11 looking at your report, and not at other documents.  
 12 You know that what we would like to ask you now, as  
 13 the Secretary explained to you a moment ago, is not the  
 14 presentations that you had prepared but a general  
 15 presentation of your report, of your methodology, of  
 16 your conclusion, about how you went about looking at  
 17 these documents, how you conducted the inspection. That  
 18 can be shorter than what we had provided before.  
 19 We will then go over to the questions, and in the  
 20 questions you may then refer, if the question calls for  
 21 it, to one or the other slides that you had specifically  
 22 prepared. Your slides as such at present are not in the  
 23 record, but they would become part of the record if they  
 24 are used in answer to a question. Your PDF document,  
 25 that may have been speaking notes or something else, is

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11:33 1 not in the record either.  
 2 Later on we will proceed to the questions. I assume  
 3 that you will allocate the answer to one of you  
 4 according to the topic and your specific expertise;  
 5 otherwise one of you will take the lead. But we should  
 6 make sure that there is one person answering one  
 7 question, and not two answers for every question. Is  
 8 that an acceptable way forward?  
 9 MR LAPORTE: Yes, ma'am, it is.  
 10 THE PRESIDENT: Is it to you too, Mr Welch?  
 11 MR WELCH: Yes, it does.  
 12 THE PRESIDENT: Good. Fine.  
 13 So then we can proceed with your presentation. To  
 14 whom do I give the floor first, or will there just be  
 15 one person speaking?  
 16 MR LAPORTE: I'm going to take the floor first.  
 17 THE PRESIDENT: Good. So, Mr LaPorte, you have the floor.  
 18 (10.34 am)  
 19 Presentation by Mr LaPorte and Mr Welch  
 20 MR LAPORTE: Alright. Thank you, Madam [President]. Good  
 21 morning to everyone. I apologise for the delay on our  
 22 part as well.  
 23 So my intention here is to basically do what you  
 24 just summarised, which is to summarise our report and to  
 25 bring everybody here through our process and then to

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11:35 1 help everyone understand sort of the way we do our  
 2 analysis and the way we do our evaluation.  
 3 So there were multiple exams that were conducted in  
 4 this particular matter with these specific documents.  
 5 Mr Welch and I sort of divided up some of the work. So  
 6 like you said, there may be questions later on about  
 7 a specific examination type, and what we'll do is we'll  
 8 just defer to the individual that was the primary  
 9 examiner, and for the record we'll just note who's  
 10 speaking at the time as well too.  
 11 The two things I think that are going to be sort of  
 12 very clear are that anything that has to do with the  
 13 chemical analysis of the inks and the paper, the hand  
 14 stamps, anything else, the printing processes, that will  
 15 come to me, so I'm the only one that has that expertise;  
 16 and then anything that has something to do with  
 17 handwriting will go to Mr Welch. So I'm not  
 18 a handwriting examiner, I don't have an expertise in  
 19 that.  
 20 I will say that all of the work that we did was  
 21 administratively and technically reviewed by  
 22 an associate in our company, Ms Jennifer Naso. Ms Naso  
 23 is certified by the American Board of Forensic Document  
 24 Examiners and she trained at the United States Secret  
 25 Service, so she has relevant training and so forth.

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11:36 1 So without further ado, I'll get into the report.  
 2 So as I've got shown up on the screen here, our  
 3 mandate was to conduct a comprehensive examination of  
 4 the disputed documents that are described later in this  
 5 report. There were nine original documents, two PDFs,  
 6 and then there were also three additional documents that  
 7 we just labelled as "DOC A", "DOC B" and "DOC C". When  
 8 we received the items of evidence from the FBI, those  
 9 three documents, as we'll discuss later, sort of mesh up  
 10 with some of these other documents, but they weren't  
 11 discussed specifically or they weren't accounted for  
 12 specifically in the terms of reference.  
 13 If we had to summarise this, we did approximately  
 14 eight to ten different tests per document, and I'm going  
 15 to discuss that testing so that everyone understands the  
 16 limitations of the testing and what can be concluded  
 17 from those types of tests. But basically, when I say  
 18 eight to ten tests, I'm talking about things that can  
 19 immediately show a document is fraudulent.  
 20 So, as an example, if we have a document that's  
 21 dated 2005 and we have a piece of paper that it's been  
 22 created on, and that piece of paper has a watermark  
 23 wasn't available until 2010, that would automatically  
 24 show that the document wasn't created on its purported  
 25 date. So many of the examinations that we conducted are

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11:38 1 designed that way, to actually show fraud.  
 2 It's actually very, very, very difficult to show  
 3 that a document is truly genuine, so that an expert  
 4 could say, "Yes, absolutely, that document is genuine".  
 5 And when I talk about these kinds of cases, I'm talking  
 6 about cases like in this matter, where we have documents  
 7 that are purported to have been created on a specific  
 8 date and signed by specific people. So unless you have  
 9 a video recording of somebody signing a document on  
 10 a specific date, it's really, really difficult to truly  
 11 and definitively say that a document is genuine.  
 12 So our job as forensic document examiners, like the  
 13 mandate says, is we're here to assist you. So what  
 14 we've done is we've conducted this extensive examination  
 15 on roughly twelve original documents and two electronic  
 16 files, using about eight to ten tests. So we're talking  
 17 about 120 mutually exclusive tests to show that  
 18 a document is fraudulent. In this particular case, not  
 19 a single one of those 120 mutually exclusive tests  
 20 showed that the documents were fraudulent. Therefore,  
 21 that would lean in the direction that the document is  
 22 genuine.  
 23 We've never said in our report that the document is  
 24 truly genuine. What we have stated was that -- I'll go  
 25 to the conclusions on page 9 of the report. What we

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11:40 1 have concluded is, based on all of those examinations  
 2 that we performed, that:  
 3 "There is no evidence of page substitution, text  
 4 alteration, text addition, or other irregularities to  
 5 indicate that any of the Disputed Documents were  
 6 fraudulently produced."  
 7 This is a very straightforward, unambiguous  
 8 statement. It's truthful, it means what it means, the  
 9 words have no other meanings. We conducted  
 10 examinations; we didn't identify any fraudulent activity  
 11 with respect to the documents.  
 12 One of the reasons that we don't make a conclusion  
 13 about true genuineness of a document is because there  
 14 may be other facts that we're not privy to. The  
 15 Tribunal may have other information that a document  
 16 examiner is not privy to, that may lend to the  
 17 genuineness.  
 18 What we feel that our position is, is we're giving  
 19 you the information about the paper documents themselves  
 20 and whether or not there's any evidence of fraudulent  
 21 activity. Once again, that's based on -- you know, I'm  
 22 trying to quantitate that, in a sense -- all of these  
 23 tests that we conduct.  
 24 Based on the statements that we have received from  
 25 both of the parties -- so we had comments from BSGR that

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11:41 1 said that our examinations were very thorough and our  
 2 examinations were extensive. So there doesn't seem to  
 3 be any dispute by the Claimants in this particular case  
 4 that our examinations were thorough and [extensive].  
 5 PROFESSOR VAN DEN BERG: When you refer to the comments of  
 6 the parties, the comments on your preliminary report?  
 7 MR LAPORTE: The comments from the final report. So there  
 8 were attachments to the final report.  
 9 PROFESSOR VAN DEN BERG: Yes, I understand that. But the  
 10 comments were made in relation to the preliminary  
 11 report?  
 12 MR LAPORTE: No, I guess those comments -- I don't  
 13 specifically recall whether or not those comments  
 14 were --  
 15 THE PRESIDENT: So we would prefer that at this stage you do  
 16 not refer to the comments made on your final report --  
 17 MR LAPORTE: Very good.  
 18 THE PRESIDENT: -- but you comment on your report itself.  
 19 MR LAPORTE: Okay. So can I make comments on the  
 20 preliminary report, or can I cite the comments on the  
 21 preliminary report?  
 22 THE PRESIDENT: Yes, absolutely.  
 23 MR LAPORTE: Okay. Well, in that case, the comments from  
 24 the Republic of New (sic) Guinea said that our  
 25 examinations were thorough and comprehensive, and that

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11:42 1 the methodologies that we conducted were approved.  
 2 Now, I will say that during the examination process,  
 3 while we were in New York, neither party objected to the  
 4 examinations that we conducted. There were no issues  
 5 that were brought up with respect to whether or not we  
 6 were being thorough. So there was nothing brought up at  
 7 the time during the examination.  
 8 The other conclusion that we did come to, which is  
 9 highlighted, and it's the second bullet in our report on  
 10 page 9, that was page 2 of R-32.  
 11 So when we received R-32, when we first examined it,  
 12 we had noticed that there were some characteristics to  
 13 indicate that the two pages didn't belong together. So  
 14 what we ended up doing was when we examined document B  
 15 and document C, we then realised that document B was  
 16 originally fastened to page 1 from R-32, and then page 2  
 17 of R-32 was originally fastened to document A.  
 18 So this finding, it doesn't seem like it's a big  
 19 deal. However, had we not been able to associate  
 20 document A and document B with R-32, that would have  
 21 been evidence that that document could have potentially  
 22 been fraudulent.  
 23 So one of the things that you will find when you do  
 24 the test is: when you eliminate the idea of something  
 25 being fraudulent, some people would interpret that as

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11:44 1 not being important. The fact is though it's because,  
 2 as we say, hindsight is 20/20. Once we make  
 3 a conclusion, and it's like, "Oh, well, that's not that  
 4 big of a deal, that would have been expected", that's  
 5 not necessarily true.  
 6 I'm going to talk about the examinations that we  
 7 performed. And I can tell you in my experience that all  
 8 of the examinations that I'm going to discuss, at some  
 9 point in my career those examinations have resulted in  
 10 me making a conclusion that a document is fraudulent.  
 11 So these are tests that are genuinely accepted, that are  
 12 used all the time.  
 13 So just to bring you through the process of when we  
 14 do an examination, the first thing that we do when we  
 15 receive the documents is we do a visual examination, as  
 16 we like to describe it. So we're looking at the gross  
 17 characteristics of the paper. We look at the staple  
 18 holes: if a document is a multiple-page document,  
 19 whether the staple holes are consistent with each other,  
 20 or if there has been a potential insertion of a new  
 21 page.  
 22 I've had many cases where somebody has tried to  
 23 reinsert a page which has different meaning: they remove  
 24 a page and reinsert a new page. We call that a page  
 25 substitution. So sometimes what will happen is either

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11:45 1 the staple holes will be different, it could be  
 2 a different piece of paper, the machine printing could  
 3 be different on the substituted page. So there's  
 4 a whole host of things that we look for to determine  
 5 whether there's a page substitution.  
 6 Now, in some cases the page substitution may not  
 7 have been with a fraudulent intent. So as a document  
 8 examiner, we have to determine whether somebody may have  
 9 signed a multiple-page document, but then after it was  
 10 signed, somebody realised, "There's something wrong with  
 11 something here, let's correct that", or somebody loses  
 12 a page, or whatever that might be. So we have to  
 13 consider that. And I can say in every single  
 14 examination that we perform, we consider alternatives,  
 15 we look for explanations.  
 16 What we do not do and what we will not do is we will  
 17 never speculate. Speculation is something that we don't  
 18 do at all. And I'll give some examples as I go through  
 19 some of the examinations on what "speculation" means.  
 20 So I think to begin with, I'm going to talk about --  
 21 we've talked about visual examinations. Now we  
 22 determine how the document was printed. And I'm sorry,  
 23 I should actually have prefaced that I'm going to talk  
 24 about the document authentication part, not including  
 25 the handwriting portion. So I'm just talking about all

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11:47 1 of the physical and chemical tests that would be  
 2 conducted.  
 3 So we'd do an examination to determine how the  
 4 document was printed. That can be of critical  
 5 importance in cases. Once again, if we have a page  
 6 substitution situation, and one page is printed with  
 7 toner, which comes from copy machines and laser  
 8 printers, but then another page is printed with inkjet,  
 9 that might indicate that one of the pages was printed  
 10 with a different machine printer, and then inserted.  
 11 Also too, in some cases when documents are printed  
 12 on photocopy machines and laser printers, and they're  
 13 printed in colour, there's a security code pattern  
 14 that's in many machines around the world. I know this  
 15 because I worked for the US Secret Service for many  
 16 years, and that's a counterfeit protection security  
 17 code, as we call it, a CPS code, but it's  
 18 an anti-counterfeiting feature. And it was really put  
 19 in a lot of colour copy machines when the quality of  
 20 those colour copy machines became so good that it would  
 21 be easy to take a €100 [note] or a US\$100 [note] and  
 22 make a photocopy of it. So that's what it was designed  
 23 for.  
 24 I can tell you in this case -- it's one of the first  
 25 things that I look for. I've identified CPS codes on

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11:48 1 thousands of documents in my career: I've seen it on  
 2 counterfeit money, I've seen it on counterfeit  
 3 materials, I've seen it on threatening letters to the  
 4 President of the United States. So I've seen it in  
 5 a gamut of cases. There were no documents that were  
 6 printed with colour toner in this particular case, and  
 7 no CPS codes were present.  
 8 We've provided colour images to both parties,  
 9 high-resolution images, and anyone that's trained in  
 10 this area would be able to identify CPS codes by just  
 11 looking at the images; you don't need to see the  
 12 originals.  
 13 Then one of the things too -- and actually I'm going  
 14 to move here to page 40 -- well, before I do that --  
 15 actually I'm going to move to page 41 of my report, and  
 16 this is table 1.  
 17 So one of the first things that we try to do when we  
 18 get documents is we sort of try to sort them out on how  
 19 they were produced, the types of inks, the type of paper  
 20 that was used. One of the things that this can help us  
 21 do is determine whether -- in this particular case we  
 22 had multiple documents that were purported to have been  
 23 created on multiple dates. So one of the things that  
 24 you want to try and look for is whether there was  
 25 contemporaneous preparation, as opposed to the documents

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11:50 1 being prepared in purportedly different timeframes.  
 2 So if a document is dated six months apart or a year  
 3 apart, and it has been constructed with all of the same  
 4 materials -- the same writing, it's the same paper, the  
 5 same printing process, it may have other physical  
 6 characteristics that would indicate that it was produced  
 7 contemporaneously, as opposed to being produced at  
 8 different times -- we want to identify that.  
 9 So one of the first things that I did in this  
 10 particular case is I do a chemical analysis of  
 11 everything. This is a totally objective type of  
 12 analysis; there's nothing subjective about it in any  
 13 way. It's just a way to start dividing the documents or  
 14 understanding sort of how they were constructed and then  
 15 putting them into their individual batches, if you will.  
 16 In this particular case we had at least thirteen  
 17 different writing inks that were used, six different  
 18 types of paper, three different toner processes, which  
 19 could actually be three different machines -- even  
 20 though the toners can't be discriminated, they could  
 21 still be coming from the same machines -- and then one  
 22 inkjet-printed document. There didn't seem to be any  
 23 evidence at that point in time that the documents were  
 24 constructed contemporaneously when they were purported  
 25 to have been created at different times.

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11:51 1 Once again, I just want to be cautious in my  
 2 statements and I'm trying to bring you through my  
 3 process, because at the end of all of this is when we  
 4 make our decision. We don't make our decisions as we go  
 5 through the process. This is no different than the  
 6 Tribunal listening to cases: you don't make decisions  
 7 early on or midway through; you wait until you have all  
 8 of the evidence, and then you make an assessment on all  
 9 of the evidence. And that's one of the important things  
 10 that I just want to continue to and I'll probably  
 11 repeatedly say, is that it's the cumulative value of all  
 12 of the evidence that's critical for the evaluation part.  
 13 We also conducted a number of tests on the stamps.  
 14 So we had noticed that many of the documents were  
 15 stamped, there were stamps on many of the documents, and  
 16 there were different types of stamps. One of the things  
 17 that you can do with stamps is possibly use it to show  
 18 whether somebody was stamping documents all at the same  
 19 time, when they were purportedly created in different  
 20 time periods.  
 21 Stamps do have variations, they have pressure  
 22 variations: it could be the person that's applying the  
 23 stamp stamps it in a different way, they hold the  
 24 stamper differently, the paper could move when you're  
 25 stamping it; there's all kinds of variations. But what

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11:52 1 we're looking for when we're doing this examination  
 2 really is to see if there's consistency in the stamps,  
 3 in the characteristics, that would indicate that the  
 4 documents were stamped at the same time. That's really  
 5 what we're looking for, at the end of the day.  
 6 So when stamps have different characteristics, so  
 7 stamps from different documents have different  
 8 characteristics, it doesn't necessarily mean that they  
 9 were stamped at a different time; like I said, there  
 10 could be differences in the application of those stamps.  
 11 So really what we're doing is we're trying to focus on  
 12 whether there was fraud or not, and whether they were  
 13 stamped consistently at the same time.  
 14 We also look for interlineations in documents. I've  
 15 had many cases, Mr Welch has had many cases where  
 16 individuals will either insert handwritten  
 17 interlineations and then say that they were done at  
 18 a specific time, or text interlineations, and that would  
 19 be adding text into a document to either change the  
 20 meaning of that or imply something else. We've seen  
 21 that in many cases. It's not totally uncommon. It  
 22 depends on the kind of cases that you see over the  
 23 course of your life or the course of your career. But  
 24 interlineations are something that's important.  
 25 Mr Welch actually conducted most of those

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11:54 1 examinations, in terms of using a grid to determine  
2 whether or not there were interlineations. We did not  
3 identify any evidence that would suggest that  
4 interlineations were in any of those documents.  
5 The indentation examination, the ESDA examination,  
6 there's really two things that we're trying to do with  
7 the impression examinations.  
8 The first is that if you have a document that's  
9 dated 2005 and it's -- so I'm just going to show this,  
10 so everybody follows. So if I have a piece of paper  
11 here that's dated 2005, and I have another document  
12 that's dated 2009, and I put my 2005 document over it  
13 and I start writing, I've just indented an earlier-dated  
14 document into a later-dated document. That later-dated  
15 document, that 2009 document, should have never been  
16 around when I signed the document in 2005. So those are  
17 the kinds of things that we're looking for with  
18 indentations, with respect to inconsistency of when  
19 things are prepared.  
20 Also ESDA can be used to see if things were -- once  
21 again, taking documents that have been purported to have  
22 been prepared in different time periods, and now someone  
23 contemporaneously puts those documents, they could  
24 potentially stack them all up and start writing on top  
25 of each other, and then now you have a whole stack of

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11:55 1 documents with indentations that don't necessarily make  
2 sense.  
3 If you have a later dated document, so if I have  
4 a 2009 document dated in a 2005 document, there might be  
5 an explanation for that, and that is -- and this happens  
6 quite often in business cases, where I have a 2009  
7 document, but I still have my 2005 document that may be  
8 part of my file, and I want to reference back to my 2005  
9 document before I sign my 2009 document. So now I pull  
10 out the 2005 document from my file, I'm looking at it,  
11 and now I take my 2009 document and then I sign it.  
12 That's not necessarily evidence in and of itself that  
13 there is something fraudulent going on. So there's  
14 an explanation for those types of things.  
15 In this particular case, we did not find any  
16 documents where the earlier-dated document was impressed  
17 into a later-dated document. So we had no  
18 conclusions -- there's no indication of fraud based on  
19 those impression examinations.  
20 Also I think things that get overlooked sometimes is  
21 when we do an ESDA examination for indentations, there  
22 maybe be information that we recover that could be  
23 helpful; it means nothing to us as a forensic document  
24 examiner, but it may mean something to either party or  
25 something to the Tribunal, and it may be some written

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11:57 1 notation that wouldn't be consistent with being on that  
2 particular document. So we report the results of those  
3 impressions and we just say, "We found such-and-such  
4 that's been written on the document".  
5 We didn't have much of that in this case; we had  
6 signatures and other things that were indented on to the  
7 documents, but no specific notes that sort of didn't  
8 mean anything to us. But it does happen quite often;  
9 I see it, you know, in a lot of different cases.  
10 Also we looked for evidence, once again, of  
11 documents being produced contemporaneously when they  
12 shouldn't have been produced contemporaneously. One of  
13 the things that you can do is you can look -- when  
14 a document comes off of a printer, or it's freshly  
15 stamped, and then you put another document on top of it,  
16 then the ink will transfer.  
17 We have to be careful with ink transfer though,  
18 because it depends on how the documents were stored, it  
19 depends on the type of ink that was used. If documents  
20 are stored together for a long time, and even though  
21 they were stamped at completely different times, some of  
22 the stamping still may transfer, some of the printing  
23 ink still may transfer as well, too.  
24 So once again, when we have those types of ink  
25 transfers happening, we have to evaluate all of the

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11:58 1 evidence as a whole. So you'll notice a lot of the  
2 things that I'm talking about, the results from these  
3 examinations in and of themselves might not prove fraud;  
4 but when you put them all together, then that might  
5 suggest strong evidence of fraud.  
6 So it really is important to understand -- and this  
7 is very, very well understood by leading authorities: we  
8 have textbooks that talk about how to be cautious with  
9 these types of examinations. And when I say "be  
10 cautious", that means be cautious in rendering opinions  
11 about genuineness, and be cautious about rendering  
12 opinions about things being fraudulent as well, too.  
13 This takes the results from a lot of different exams,  
14 and then you have to look at it altogether to finally  
15 make that type of evaluation.  
16 The other thing I wanted to talk about was the  
17 adhesive stamps in this particular case, because this is  
18 a little bit of a -- the adhesive stamps are the timbre  
19 fiscal stamps. They were a little different, because  
20 they had serial numbers on them.  
21 I'm going to go to page 49 in our report.  
22 When I worked with the Secret Service, I had a lot  
23 of information and knowledge about, as we call them,  
24 authorised documents. And documents could be these  
25 timbre fiscal stamps, if you will; it could be

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12:00 1 a document, if you will. I think for the layperson we  
 2 will just call them "stamps", and we won't call them  
 3 "documents".  
 4 But when these authorised stamps -- these are  
 5 authorised by the government; they have serial numbers  
 6 that are attached to them. We are not privy to how the  
 7 serial numbers are issued and how they are administered  
 8 on these timbre fiscal stamps. Once the serial numbers  
 9 are put on the stamps, we have no idea how the stamps  
 10 are distributed. So you could have a serial number from  
 11 1 to 100 and a serial number from 101 to 200. And they  
 12 come out of the factory, then they're issued, and then  
 13 the stamps go off in different directions. We have no  
 14 idea how those stamps are distributed.  
 15 And then also, once again -- and I will qualify this  
 16 statement: it's my understanding, so I don't know this  
 17 for sure, but it's my understanding that companies would  
 18 buy these timbre fiscal stamps, and we don't know how  
 19 the company buys them and then stores them, and they  
 20 could be put off in different places and they could be  
 21 used over different times. So there's just a lot of  
 22 information that we did not have about the timbre fiscal  
 23 stamps.  
 24 We stated specifically in our report that if we were  
 25 privy to certain information, and these stamps had

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12:01 1 serial numbers that were not available on the purported  
 2 date, that would certainly be evidence that -- maybe not  
 3 that the whole document is not authentic, but that the  
 4 stamps were being not applied when they were purported  
 5 to have been applied.  
 6 We did find a known stamp in the comparator  
 7 documents. We noticed that the one on K20 had a prefix  
 8 of "BB", and that was stamped on December 16th 2009.  
 9 All of the stamps that we identified on the disputed  
 10 documents had a prefix of "BA". So we are making the  
 11 assumption that "BA" comes before "BB", but I don't know  
 12 that for sure. Common sense and logic would tell me  
 13 that, but we don't know that.  
 14 What we did find certainly is that the adhesive  
 15 stamps with respect to the documents -- I'm going to go  
 16 to page 50.  
 17 So these are the stamps that were on R-24. What we  
 18 are seeing here is that these are characteristics that  
 19 would be -- the adhesive stamps -- these would be -- the  
 20 serial numbers, the last two digits end in 26 and 27,  
 21 they appear to be consecutive stamps, and they were  
 22 applied on that document. There's no indication that  
 23 they were applied, that one page was substituted and  
 24 another stamp was used. There were no inconsistencies  
 25 with respect to the sequence of the stamps within each

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12:03 1 of the disputed documents.  
 2 We qualified this in our report, and we were very  
 3 specific that we just don't have certain information.  
 4 Now, other people -- the Tribunal may get information,  
 5 or one of the parties may have information. This is one  
 6 of the reasons why we don't conclude that the document  
 7 is genuine. So in essence -- and I'll be cautious on  
 8 how I qualify this -- in essence, it's an incomplete  
 9 examination, in the sense that we just don't have all of  
 10 the information.  
 11 Now, if you have information or somebody else has  
 12 information about these timbre fiscal stamps and the  
 13 serial numbers, and the serial numbers were not  
 14 available when the documents were purportedly produced,  
 15 then that information should be used. But it's not  
 16 information that we're privy to. We're very clear in  
 17 our report and we're very transparent throughout our  
 18 entire report about what we know and what we don't know,  
 19 and what we're going to say and what we won't say.  
 20 However, what we won't do is we won't speculate  
 21 about the sequencing and so forth, because of all the  
 22 reasons that I have talked about: that we don't know how  
 23 these were distributed, there's too many variables for  
 24 us not to understand. And it would be irresponsible for  
 25 us to make any conclusions otherwise about the

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12:05 1 sequencing of the stamps and how they were used on the  
 2 different documents, other than "BB" seems to be  
 3 a prefix that follows "BA". That was used in 2009. It  
 4 would seem that all of these documents -- the stamps,  
 5 I'll say -- were consistent with being produced before  
 6 December 2009.  
 7 PROFESSOR VAN DEN BERG: Mr LaPorte, may I ask you  
 8 a question here.  
 9 MR LAPORTE: Of course.  
 10 PROFESSOR VAN DEN BERG: How do we distinguish between  
 11 considering an alternative and speculation?  
 12 MR LAPORTE: I think there's certainly the alternative, and  
 13 I think what I'm trying to say, and maybe not being  
 14 clear, is the alternative is -- we are thinking about  
 15 the alternative, but there's too many variables now with  
 16 the alternative, that it begins to turn into speculation  
 17 if we don't have all of that information. So we  
 18 certainly look at all of the alternatives.  
 19 Mr Welch and I discussed this extensively when we  
 20 had this finding. We discussed --  
 21 THE PRESIDENT: This is a question of degree actually? If  
 22 you have too many alternatives, it gets to a degree  
 23 where it becomes speculation; is that what you're  
 24 saying?  
 25 MR LAPORTE: Yes, it's when the potential alternative

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12:06 1 explanation has too many variables associated with it,  
 2 where there's too many unknowns at that point in time.  
 3 One of the reasons in the report -- and you will  
 4 notice that we use the terminology "no evidence to  
 5 indicate", and we use that throughout our report, and we  
 6 use that quite extensively. The reason that we did that  
 7 is because we performed an examination on -- for all  
 8 practical purposes, we did fourteen documents, and our  
 9 intent was -- so we had nine originals, two PDFs, and  
 10 then the three -- DOC A, DOC B, and DOC C.  
 11 So when we did those examinations, what we wanted to  
 12 do and intended to do was bring you through our process  
 13 for each document. So we examined each individual  
 14 document, we did a series of tests, and then we made  
 15 a summary statement after that. I think it would have  
 16 been irresponsible of us had we not made that summary  
 17 statement at all. And at the end of doing all of these  
 18 examinations, we say in our conclusion, "There's no  
 19 evidence to indicate".  
 20 So the whole idea is to sort of bring you through  
 21 each one step by step, saying, "Okay, we examined this  
 22 document, we did this particular test, we did test X,  
 23 test Y and test Z, and none of them show fraudulence".  
 24 So then that's a summary statement.  
 25 Now, if one of those documents -- and once again,

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12:09 1 watermarks, it could be serial numbers on forms or  
 2 whatever: there's some identifying feature that could  
 3 help you use the paper to help identify when the paper  
 4 was first used or first commercially available.  
 5 I guess what I did not discuss either is the  
 6 chemical examinations, and I apologise for that. That's  
 7 the one I shouldn't miss, but I did.  
 8 So one of the things that we do do, or we can do, is  
 9 we can look at whether the inks were available on  
 10 a purported date. We did that in this particular case;  
 11 I did not find any instances where a particular writing  
 12 ink was not available on its purported date. There were  
 13 some inks that I just could not identify, and I was very  
 14 clear in my report on what those were. But ultimately  
 15 I did not find any inks that were manufactured after the  
 16 date of when the document was said to have been  
 17 produced.  
 18 The other thing I just wanted to talk about too is  
 19 when we talk about the blue stamps as well too -- so  
 20 this is the examination I talked about earlier with  
 21 respect to looking at the physical attributes. So these  
 22 blue stamps were found in -- sorry, let me go back to...  
 23 So this was intended to be a comparison of the blue  
 24 stamps that were used on R-24 R-25, R-26 and R-27.  
 25 These are representative images. And we did do a very

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12:07 1 this is where our hindsight is 20/20 when we look back.  
 2 We didn't know when we were doing these examinations  
 3 whether the evidence was going to indicate whether or  
 4 not they were fraudulent. One of these documents may  
 5 have had evidence of fraudulence. So as we go through  
 6 each one, if we would have found evidence of fraud, then  
 7 it would have been for that specific document. And then  
 8 we would have started trying to figure out: well, is  
 9 that document associated with anything else?  
 10 So although we're looking at the cumulative value of  
 11 all of the evidence, we're still examining each  
 12 individual document and we're coming up with  
 13 a conclusion for each document.  
 14 I think finally, the only other thing that I wanted  
 15 to sort of finish with is -- and I'll make sure I have  
 16 this in my notes ...  
 17 THE PRESIDENT: Have you covered all the tests that you have  
 18 conducted? I have counted eight in your presentation so  
 19 far, but maybe ...  
 20 MR LAPORTE: Yes, so I think one of the things that -- the  
 21 test that maybe we didn't discuss is the example of  
 22 looking for a watermark in paper.  
 23 So we do a paper examination, we look for  
 24 a watermark. In this particular case we didn't find any  
 25 watermarks on the paper. And sometimes it's not just

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12:11 1 thorough examination of each of the defects. We didn't  
 2 put that in the report, because that can get quite  
 3 extensive and quite long, so we offered examples. One  
 4 of the things though that I think can be important is  
 5 certainly looking at the purported dates.  
 6 So this particular stamp here was purported to have  
 7 been applied to the document on 02/03/06, and then this  
 8 one was 21/07/06, so it's four months apart. And what  
 9 we see are some differences; certainly they could have  
 10 been pressure differences. But one of the things, you  
 11 know, that we did find in this particular stamp here is  
 12 there's a little defect right there on the inner circle,  
 13 that's above the E in Guinea, and we have other stamps  
 14 that show that defect even much better --  
 15 MR LIBSON: Excuse me, Madam President. This is not in  
 16 Mr Welch's report.  
 17 MR LAPORTE: This is my report that I'm working from.  
 18 MR LIBSON: No, but it expressly says it's not in the  
 19 report, and you've now expressly said on the record that  
 20 you didn't put it in the report because it can be "quite  
 21 extensive and quite long". But it is expressed in the  
 22 materials we received overnight.  
 23 MR OSTROVE: It's on page 100 of his report.  
 24 THE PRESIDENT: Can you just refer to the page, if it is in  
 25 your report.

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12:12 1 MR LAPORTE: Yes, it's page 100 of my report. This is the  
 2 images right from my report.  
 3 THE PRESIDENT: What did you say before was not in your  
 4 report?  
 5 MR LAPORTE: Oh, I said we have other images, many other  
 6 images. We had --  
 7 THE PRESIDENT: In respect of the blue stamps?  
 8 MR LAPORTE: Yes. So we're using this --  
 9 THE PRESIDENT: And you made a selection for your report; is  
 10 that what you're saying?  
 11 MR LAPORTE: Correct. But I'll use these images from here.  
 12 MR LIBSON: Sorry, that's not what was said on the record.  
 13 Maybe it was a mistake. But what was said (page 59,  
 14 line 23, to page 50, line 1) was that:  
 15 "These are representative images. And we did do  
 16 a very thorough examination of each of the defects. We  
 17 didn't put that in the report, because that can be quite  
 18 extensive and quite long ..."  
 19 But it is in the material that came overnight.  
 20 THE PRESIDENT: Maybe we just ask Mr LaPorte to re-explain.  
 21 What type of test did you do with respect to the  
 22 blue stamps? What did you put in your report and what  
 23 did you not put in your report?  
 24 MR LAPORTE: That's fair enough.  
 25 So what we did put in our report was: there was no

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12:13 1 evidence to indicate that the stamps that were  
 2 purportedly applied in different time periods were  
 3 actually applied contemporaneously. And what I was  
 4 pointing out here is: here's a defect in a July 21st  
 5 stamp, that also occurs in another document in  
 6 a July 21st stamp, that's not present in the March 2nd  
 7 stamp. So you don't see that there.  
 8 So these are the kinds of things that we're looking  
 9 for. We explain this quite elaborately in the early  
 10 part of our report, and throughout our report: that we  
 11 do look for characteristics that would be consistent  
 12 with the stamps being applied at the same time on  
 13 documents that have different dates. I think that's  
 14 about as simple as I can put that.  
 15 We did not find any evidence of stamps being  
 16 applied -- any physical characteristics or chemical  
 17 characteristics that would have indicated that the  
 18 stamps on the 02/03 document were the same as the stamps  
 19 on the 21/07 document, and they're dated four months  
 20 apart. We were certainly looking for that, we were  
 21 looking for that kind of evidence.  
 22 As part of our examination, we always question  
 23 ourselves too. We're constantly doing that. We  
 24 challenge ourselves and we look for the alternative  
 25 explanations. The alternative explanation in this

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12:15 1 particular case is: "Well, let me look at the other  
 2 stamps: is that a pressure difference? It seems to be  
 3 occurring on multiple documents that are consistent with  
 4 being produced at different times, but we're not seeing  
 5 it in another document". So those are the kinds of  
 6 alternative explanations that I was discussing earlier.  
 7 With respect to our terminology -- and I'm just  
 8 going to conclude with this. So with respect to our  
 9 terminology, and just to be clear, when we say there's  
 10 no evidence to indicate fraud, this would be no  
 11 different than a criminal trial when somebody is found  
 12 not guilty, right? So they're presumed innocent, but we  
 13 don't know for sure that they're innocent; they're just  
 14 found not guilty, and it's based on the evidence that  
 15 you've evaluated.  
 16 We do something similar to that in this case, where  
 17 there's no evidence to indicate that the documents were  
 18 fraudulently produced. We don't know for sure, 100%,  
 19 Mr Welch and I can't sit up here and tell you with 100%  
 20 certainty that they're genuine documents. We kind of  
 21 explained some other reasons why --  
 22 THE PRESIDENT: I think you've already explained this when  
 23 you started, so that is well understood.  
 24 I'm looking at my watch, and I start being a little  
 25 concerned. Have you completed your presentation?

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12:16 1 MR LAPORTE: I have, yes.  
 2 THE PRESIDENT: Thank you very much. Can I turn to  
 3 Mr Welch.  
 4 MR WELCH: Yes, thank you.  
 5 As Gerry indicated, I'm going to handle the  
 6 handwriting examination portion with respect to our  
 7 report.  
 8 We concluded that Avraham Lev Ran -- and this is  
 9 regarding the handwriting results, which are in the  
 10 summary if we go to page 9:  
 11 "It has been concluded that Avraham Lev Ran wrote  
 12 the disputed Avraham Lev Ran signatures on R-24, R-25,  
 13 and R-26.  
 14 "There are indications that Avraham Lev Ran may have  
 15 written the disputed A.L. initials on R-26.  
 16 "It has been concluded that Marc Struik wrote the  
 17 disputed Marc Struik signature on R-27.  
 18 "It has been concluded that Avidan Asher wrote the  
 19 disputed Avidan Asher signatures on R-28 and R-29.  
 20 "There are indications that the Lansana Tinkiano ...  
 21 signatures on R-25, R-26, and R-27 may have all been  
 22 written by the same person.  
 23 "There are indications that the Mamadie Touré  
 24 signatures on R-24, R-27 through R-32, R-269, R-346.2,  
 25 DOC B, and DOC C may have all been written by the same

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12:19 1 person."  
 2 And finally:  
 3 "Although no known comparison samples were submitted  
 4 for comparison with the remaining disputed signatures,  
 5 no evidence or characteristics currently associated with  
 6 traced or simulated forgeries were observed [in the  
 7 handwriting examinations conducted in this matter]."  
 8 So in a handwriting comparison, handwriting is  
 9 identifiable with an individual. A number of factors  
 10 contribute to that. This individuality reflected in our  
 11 handwriting is characterised by the fact of the letter  
 12 forms and the handwriting systems that we're taught in  
 13 early childhood development, in elementary school, the  
 14 size of our hands, the size of our fingers, our skeletal  
 15 and muscular makeup, how we hold the writing instrument,  
 16 in addition to how we visually picture our writing to  
 17 look. All combined are what make handwriting individual  
 18 and unique to each and every person.  
 19 The theory of handwriting is that no two people  
 20 write the same way. No one person, because we're not  
 21 machines, writes exactly the same way twice. Each  
 22 person has a level of variation in their handwriting,  
 23 and each individual has a skill level, an acquired skill  
 24 level.  
 25 In handwriting identification, and how the

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12:21 1 examination and the methodology compare to the processes  
 2 conducted, is you evaluate the questioned material or  
 3 the questioned writing for individual handwriting  
 4 characteristics. These handwriting characteristics can  
 5 include line quality, letter formations, height  
 6 relations, proportions, size, slant, position to  
 7 baseline, pen pressure and pen pressure variation,  
 8 diacritics: your "i" dots, your "t" crosses and their  
 9 relative positions.  
 10 Those are just some of the handwriting  
 11 characteristics that a forensic document examiner is  
 12 going to look at and evaluate in the examination  
 13 process. That is done in both a questioned body of  
 14 writing and a known body of writing. But the important  
 15 thing in this process first is to look at the questioned  
 16 or disputed writing in any given matter to see if there  
 17 is evidence of fluency and naturalness in the writing  
 18 which would suggest that it is genuine.  
 19 There are characteristics that tell us if a writing  
 20 exhibits those qualities of genuineness: flying starts  
 21 and flying finishes, where the hand, arm and wrist  
 22 movement is moving as the pen touches the paper. We  
 23 look at hooks -- and those flying starts and finishes  
 24 again can be observed at the beginning and ending of  
 25 strokes. In addition to that, we look at hooks at the

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1 beginning and ending of certain strokes.  
 2 Additionally, when we're looking at line quality for  
 3 genuineness, we're looking for smooth, even lines that  
 4 don't represent or don't have characteristics of  
 5 shakiness, or what we typically call "tremor". So we're  
 6 looking for smooth, even lines. We're looking for  
 7 variation: looking for variation in the width and  
 8 changes of lines as it exhibits pen pressure variation,  
 9 and movement and change, depending upon direction of the  
 10 stroke.  
 11 So in the evaluation process the first thing, like  
 12 I said, is we look at the questioned writing to  
 13 determine whether there's evidence of genuineness or  
 14 forgery.  
 15 Now, when we talk about characteristics of forgery,  
 16 we're talking about slow, deliberate writing. If  
 17 somebody is attempting to trace -- I think we all know  
 18 what a tracing is -- or simulate, where somebody  
 19 basically freehand draws somebody else's signature onto  
 20 a particular document, the characteristics again,  
 21 because of that drawn appearance, the line quality is  
 22 going to look very slow, it's going to look deliberate;  
 23 because it's slow, you're going to see evidence of  
 24 tremor or shakiness in the line, because a forger can't  
 25 duplicate the speed at which the original person signs

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12:24 1 their particular name, or writes a particular body of  
 2 writing. We're going to see pen stops, pen lifts,  
 3 hesitation, possible retouching where they come back and  
 4 they try and touch up a particular area of the  
 5 signature.  
 6 Again, when we think about the unconscious act,  
 7 especially as it relates to our signatures, when we sign  
 8 our name we essentially give very little, if any,  
 9 conscious decision-making process on each and every  
 10 element of our signature. When we sign our name, for  
 11 the most part it's an unconscious act: we put the pen to  
 12 the paper and without thought we sign our name to  
 13 a particular document. Again, because a forger has to  
 14 try and get all of the elements of the writing so that  
 15 it looks similar, they have to think about every element  
 16 of the person's signature that they're trying to copy or  
 17 imitate.  
 18 Once I've evaluated the genuineness or the quality  
 19 of genuineness or forgery in the questioned writing,  
 20 I then do a comparative analysis and similar  
 21 observations with respect to the known writing. Is  
 22 there evidence in the known writing that would suggest  
 23 that somebody is trying to deliberately disguise or  
 24 distort the writing? Is there distortion based on  
 25 natural causes, which could be due to age, elderly,

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|  |  |
|--|--|
| <p>12:26 1 where we would see some natural tremor in the line<br/>                 2 quality of the writing?<br/>                 3 So once I've determined that, I then evaluate the<br/>                 4 individual and unique handwriting characteristics that<br/>                 5 I previously mentioned, in both the questioned body of<br/>                 6 writing and the known body of writing. Then I conduct<br/>                 7 a collative examination, or a side-by-side examination,<br/>                 8 evaluating both the significant individual and<br/>                 9 identifiable handwriting characteristics in both the<br/>                 10 questioned material and the known material.<br/>                 11 These evaluations encompass both similar handwriting<br/>                 12 characteristics and dissimilar handwriting<br/>                 13 characteristics. It also looks to evaluate<br/>                 14 characteristics and a determination for variation. Do<br/>                 15 the characteristics fall within the variation of<br/>                 16 a particular writer, or is there some type of evidence<br/>                 17 that may indicate that a certain feature within a body<br/>                 18 of writing could be an accidental or an unexplained<br/>                 19 feature or a stroke?<br/>                 20 So in this particular case, after I evaluated each<br/>                 21 and every signature -- we can go to page 53 of our<br/>                 22 report, and I have that up -- I looked at the two<br/>                 23 signatures. The Mamadie Touré signatures, there was<br/>                 24 a signature on page 1 and page 2 of that document.<br/>                 25 There was also a signature of Mr Avraham Lev Ran on</p> <p style="text-align: center;">Page 69</p>                               | <p>12:30 1 which is where my pointer is at, if you can see it on<br/>                 2 the screen.<br/>                 3 Also the line quality is nice and smooth, the edges<br/>                 4 are smooth throughout the signature. There's variations<br/>                 5 in line widths, which you can see here where my pointer<br/>                 6 is in this upstroke; and where my pointer is now, this<br/>                 7 downstroke right to the left of it. There's also<br/>                 8 pressure variation in the signature.<br/>                 9 After evaluating this for genuineness, that there's<br/>                 10 no evidence of forgery, I then evaluated the known<br/>                 11 signatures and charted both the questioned and the<br/>                 12 known, examining the individual unique handwriting<br/>                 13 characteristics, and put a chart together. And we can<br/>                 14 go to page 56 for that.<br/>                 15 Page 56 is a chart. Submitted for comparison were<br/>                 16 47 known, original comparison samples. As you can see<br/>                 17 in the chart, not all 47 samples are in the chart, but<br/>                 18 all 47 were used in my examination process. And for the<br/>                 19 illustration for court, I put 9, and charted 9 out.<br/>                 20 And what we can see here, if I enlarge this -- and<br/>                 21 I'm going to simply go through -- I'm not going to do<br/>                 22 this for each and every signature, otherwise we will be<br/>                 23 here for three days. I'm going to point out some of the<br/>                 24 similar handwriting characteristics that were the<br/>                 25 individual and unique identifiable handwriting</p> <p style="text-align: center;">Page 71</p> |
| <p>12:28 1 R-24.<br/>                 2 In the observations with respect to Mamadie Touré,<br/>                 3 I didn't see any evidence of tracing or simulation which<br/>                 4 would be in the characteristics commonly associated with<br/>                 5 a traced or simulated forgery. You can see at the top<br/>                 6 of the second vertical stroke there's a nice flying<br/>                 7 start coming into the stroke, which exhibits or is<br/>                 8 characteristic of speed and movement, and you can see<br/>                 9 that the strokes taper nicely. Each and every stroke<br/>                 10 within both of those signatures have nice smooth edges:<br/>                 11 you can see pen pressure and pen pressure variation<br/>                 12 throughout that signature.<br/>                 13 After evaluating that, there was no comparative<br/>                 14 samples for which to conduct an examination.<br/>                 15 So if we go to -- this is actually R-24's signature,<br/>                 16 Avraham Lev Ran. Again, in looking at this particular<br/>                 17 signature, is there evidence of genuineness, or is there<br/>                 18 evidence of forgery? There's obvious evidence of<br/>                 19 genuineness with this particular signature. You can see<br/>                 20 at the top of the vertical stroke a nice long flying<br/>                 21 start or drag stroke up to the top of that document<br/>                 22 where it proceeds down. It has a hook down to the<br/>                 23 bottom left of that vertical, which is another flying<br/>                 24 ending stroke, that hand or pen movement as the pen is<br/>                 25 coming off the paper and moving in to the next stroke,</p> <p style="text-align: center;">Page 70</p> | <p>12:32 1 characteristics, both between the questioned R-24<br/>                 2 Avraham Lev Ran signature and the known comparative<br/>                 3 writings of Mr Lev Ran.<br/>                 4 So just to point out some of the features, this<br/>                 5 bottom arrow is showing the relationship. And I should<br/>                 6 state, as I know that in appearance one may think in<br/>                 7 looking at this that I'm showing direction of stroke,<br/>                 8 that's not the case in this particular regard. These<br/>                 9 arrows aren't reflecting stroke; they're basically<br/>                 10 pointing out certain relational proportions.<br/>                 11 So this bottom arrow that slants down and to the<br/>                 12 right is a relationship of the bottom of these two<br/>                 13 strokes.<br/>                 14 The next arrow, just to the right, pointing up to<br/>                 15 the 9 o'clock region, is this loop size, which is<br/>                 16 consistent with Mr Lev Ran's habit.<br/>                 17 The next arrow is this nice fine terminal stroke.<br/>                 18 It tapers out, which is telling me once again that<br/>                 19 there's speed and movement as that stroke is coming to<br/>                 20 completion and lifting off the paper. Also the<br/>                 21 relationship and where that ending stroke is, in<br/>                 22 relationship to this bottom extended movement and the<br/>                 23 bottom of the vertical movement.<br/>                 24 The next arrow, just above the one that we were<br/>                 25 looking at with the terminal stroke, where I'm pointing</p> <p style="text-align: center;">Page 72</p>   |

12:34 1 to this hook that comes out at the bottom of the  
2 vertical stroke, which has again speed and movement,  
3 a flying finish, is consistent with the habits of  
4 Mr Lev Ran.  
5 Next, the arrow where my pointer is pointing. After  
6 the pen movement, after the downstroke is completed and  
7 comes back up, the next stroke begins where my pointer  
8 is right here, and it begins to travel up and to the  
9 right, towards the 3 o'clock region, and then retraces  
10 back, down and to the left of the page.  
11 THE PRESIDENT: Can I just ask you a question here.  
12 MR WELCH: Yes.  
13 THE PRESIDENT: How do you know that after the end of the  
14 stroke at the bottom, then the signature continues  
15 above, at the next arrow that you showed us?  
16 MR WELCH: Yes, if we can go back to ...  
17 THE PRESIDENT: Yes.  
18 MR WELCH: Yes. So the direction in this particular  
19 signature and in another Avraham Lev Ran signature,  
20 you'll see this little ink movement here. So the  
21 evidence supports, and the characteristics of this  
22 writing -- because we have some gooping coming out on  
23 the back side, the left side of this. You can see this  
24 ink.  
25 So as the ink in the ball of the writing instrument

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12:36 1 is moving, it's collecting ink, and as it makes a turn  
2 in that direction, it deposits the ink. So the  
3 characteristics are that the pen starts up here, comes  
4 down, and then comes back up. And we see this little  
5 ink spot here, characteristic of that pen briefly  
6 brushing the paper as it's coming in to begin the next  
7 stroke.  
8 So that's the evidence and the characteristics that  
9 tell me that this is the formation in the movement in  
10 this particular signature, and we'll see that more  
11 clearly in the following signature.  
12 THE PRESIDENT: Thank you.  
13 MR WELCH: Then we have this relationship between this first  
14 movement, or this movement where we've got the retrace,  
15 we've got that arrow moving up towards the 1 o'clock.  
16 We also have the arrow at the very top, between the two  
17 furthest and highest extended points in this particular  
18 signature.  
19 So these are some of the handwriting characteristics  
20 that were observed in both the questioned and known  
21 handwriting samples. And once again, I concluded that  
22 Avraham Lev Ran wrote the questioned signatures on R-24,  
23 R-25 and R-26.  
24 Now let's go to [page] 67. So once again, I looked  
25 at and evaluated this questioned signature to determine

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12:39 1 if there was evidence of genuineness or there was  
2 evidence of forgery.  
3 As you can see, there's nice smooth lines. We see  
4 the narrowing and thickening of lines that goes along  
5 with the pen pressure variation. A great example of  
6 that is this particular stroke, if you follow my cursor  
7 up: how nice and thin that line is coming up, it starts  
8 to get heavy going into the top, and gets heavier even  
9 coming down with the downstroke. So we're seeing  
10 variations in the pen widths.  
11 We can also see -- better with the microscopic  
12 image -- but there's pen movement as this stroke starts,  
13 there's some ink deposit here as this stroke starts and  
14 then comes back to the left. You can also see pressure  
15 variation here. And this is what I would expect to see  
16 in a genuine document. What I'd expect to see in  
17 a forged, traced or simulated [signature] is something  
18 very slow, heavy and deliberate all the way through the  
19 signature, that would be dark, like this portion of the  
20 signature here. It would be heavy throughout, have  
21 a drawn appearance.  
22 PROFESSOR VAN DEN BERG: May I ask a question, Mr Welch.  
23 MR WELCH: Sure.  
24 PROFESSOR VAN DEN BERG: Are you familiar with the device  
25 autopen?

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12:40 1 MR WELCH: What's that?  
2 PROFESSOR VAN DEN BERG: Are you familiar with the device  
3 autopen?  
4 MR WELCH: I'm familiar with it.  
5 PROFESSOR VAN DEN BERG: Could an autopen be programmed in  
6 such a way that you have differences in pressure?  
7 MR WELCH: It may.  
8 PROFESSOR VAN DEN BERG: Maybe you should first explain to  
9 everybody what an autopen is. I understand that the  
10 President of the United States signs with autopen all  
11 his fan mail --  
12 MR WELCH: Yes.  
13 PROFESSOR VAN DEN BERG: -- when he responds to his fan  
14 mail. (Pause)  
15 MR WELCH: Yes. So there are mechanical devices that can  
16 create from a machine a signature that looks like  
17 an individual's particular signature. This is what  
18 you're talking about. And there are some machines and  
19 mechanisms in these autopens that can give you some  
20 evidence of this. But you're going to typically see,  
21 for the most part, some blunt beginning and ending  
22 strokes. You're not going to see variation from one  
23 signature to another when you're talking about an  
24 autopen, unless they're changing up the signature. They  
25 can do that.

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12:41 1 But in this particular case, an autopen can't pick  
 2 up the fine and subtle detail in the writing. The pen  
 3 drags, where the pen is very lightly coming off the  
 4 paper. The same thing with hooks: that particular  
 5 mechanical device cannot duplicate that to the extent of  
 6 what you would see in an individual signing their  
 7 signature normally and naturally.  
 8 PROFESSOR VAN DEN BERG: Okay. So an autopen would be  
 9 speculation in this case, or an alternative?  
 10 MR WELCH: You could say that that could be an alternative  
 11 approach. But in my opinion an autopen was not used in  
 12 any of these signatures.  
 13 PROFESSOR VAN DEN BERG: Okay, thank you.  
 14 THE PRESIDENT: Can I just ask another question.  
 15 You tell us that the forger would sign slowly,  
 16 deliberately, consciously. But if I'm a gifted forger  
 17 and a diligent forger, I train a lot, because I'm  
 18 diligent, and I do it well, because I'm gifted. Now,  
 19 could I not, especially for simple signatures, like the  
 20 Mamadie Touré signature, also reproduce these  
 21 characteristics that you assign to genuine signatures?  
 22 MR WELCH: In a simplistic signature, yes, they may be able  
 23 to practise that enough to get that with some fluency,  
 24 and you might see some of those characteristics. In my  
 25 opinion, in a signature like the Avraham Lev Ran, it's

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12:43 1 complex. There's a lot of movement: there's nine  
 2 different movements, ten if you include the terminal  
 3 stroke.  
 4 So I would say: yes, in a signature like  
 5 Mamadie Touré; in my opinion, no, with a signature like  
 6 with respect to Avraham Lev Ran. They're not going to  
 7 get all of the handwriting, they're not going to be able  
 8 to produce the fine and subtle details in the writing  
 9 characteristics, with the flying pen starts, the flying  
 10 pen finishes, the pen drags, the pen pressure variation.  
 11 Again, when we look at pen pressure variation, all  
 12 of us let on and off with pressure throughout our  
 13 signature. We don't think about it, it's an unconscious  
 14 thing, but it can be very repetitive for that particular  
 15 person. Well, that's another thing that the forger  
 16 can't get. They can't hold the writing instrument  
 17 exactly the same way that -- a forger can't hold it the  
 18 same way as the original person whose writing they're  
 19 trying to duplicate. They don't have the same muscular,  
 20 they don't have the same skeletal makeup, they don't  
 21 have the same arm and wrist movement to replicate that  
 22 same pen pressure and pen pressure variation.  
 23 THE PRESIDENT: Thank you.  
 24 MR WELCH: Yes.  
 25 So we're going to go to [page] 79. Here at 79 we

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12:45 1 can see once again all of the characteristics that I've  
 2 talked about: good line quality, smooth, even lines, pen  
 3 pressure, pen pressure variation. In this particular  
 4 case you can see this nice downstroke, and actually at  
 5 the top of that character is a very slight flying start  
 6 into that, that you can't see very well in this PDF  
 7 image of our report, where it comes up to the top, comes  
 8 down, and you see this nice pen drag, beautiful pen drag  
 9 or flying finish coming out of that stroke, going into  
 10 the next stroke. And this is again, when we talk about  
 11 the signature in R-24, the direction, we can see that  
 12 this movement is similar throughout these signatures.  
 13 Also the pen pressure variation, you can see this  
 14 stroke here. This stroke coming up is nice and light  
 15 coming up, and heavy coming down as it turns. It  
 16 finishes out, you see a nice tapered stroke. So there  
 17 is no evidence of or characteristics commonly associated  
 18 with traced or simulated forgeries.  
 19 Let's go in order of my conclusions in the report.  
 20 I'm going to go to page 81 of our report, the Avraham  
 21 Lev Ran initials.  
 22 So again, in looking at these particular initials,  
 23 C0330.7, C0330.8 and C0330.9 were evaluated and used in  
 24 the examination process. We can see this nice hook,  
 25 indicating movement coming into that stroke, at the

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12:47 1 bottom of the "A", first stroke into the "A". In the  
 2 second stroke of the "A", we see a nice little tapered  
 3 stroke. You can see tapered strokes and hooks in these.  
 4 You see variations in line widths. And again, I don't  
 5 see any evidence of or characteristics associated with  
 6 simulated or traced forgeries in these particular  
 7 questioned samples.  
 8 So here are the four initials on pages -- and I've  
 9 got them in the chart on pages 1 and 4.  
 10 THE PRESIDENT: I think you should say that we are now on  
 11 page 83.  
 12 MR WELCH: I'm sorry. We are now on page 83, thank you.  
 13 So there's evidence of fluency in the knowns that we  
 14 just looked at, and there's also evidence of fluency in  
 15 the four questioned "A.L." initials on R-26, the four  
 16 pages comprising that document. We can see tapered  
 17 strokes, pressure variation, we see hooks, the pen  
 18 moving into the strokes. Even in the diacritics,  
 19 there's movement in the diacritics, the "i" dot or the  
 20 periods. You can see this on the "A.L." initials on  
 21 page 2: you see that movement up and to the right. You  
 22 see it on page 3: movement up and to the right slightly.  
 23 And the same thing in that first period on page 4.  
 24 THE PRESIDENT: While you are on this page, looking at it,  
 25 I was struck by the differences. But maybe you tell me

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12:49 1 these are not differences, or they are differences but  
 2 they don't matter.  
 3 If you look at the top of the "A", for instance,  
 4 it's written very differently between the first, the  
 5 second, the second and the third are about the same, and  
 6 the fourth is very different. Does that not matter?  
 7 MR WELCH: With respect to the "A" on page 1, it's much  
 8 larger, and that form is absolutely dissimilar with the  
 9 known handwriting samples. But there is a similar form  
 10 in one of the printed names on one of these documents,  
 11 but the size is not as large, so it's dissimilar, and  
 12 I noted that.  
 13 THE PRESIDENT: I didn't even think of the size. I thought  
 14 the top of the "A", which is round in the left, and is  
 15 completely pointu ...  
 16 MR WELCH: Yes, if I could have a moment I can show you.  
 17 (Pause)  
 18 You can see here in C0084.7 this similar beginning  
 19 stroke, where it starts here, it comes down, and then  
 20 you see this flat area at the top of the "A", which, if  
 21 you were to put them side by side -- give me one  
 22 second ...  
 23 THE PRESIDENT: I think it's fine, we're seeing it.  
 24 So from the fact that in another document, which is  
 25 a known document --

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12:54 1 MR WELCH: This is a known document, correct.  
 2 THE PRESIDENT: -- you find the same shape, that is actually  
 3 a different shape --  
 4 MR WELCH: Correct, it's not nearly the same in size. But  
 5 again --  
 6 THE PRESIDENT: No, no, I'm still not speaking of size; I'm  
 7 speaking of form. And the form at the top of the "A"  
 8 which I find in the first sample on page 83 is similar  
 9 to that which you have shown in the known document.  
 10 MR WELCH: Yes, I would say that it's a similar movement.  
 11 THE PRESIDENT: That is what you're saying?  
 12 MR WELCH: Yes.  
 13 THE PRESIDENT: And therefore you're not concerned by it?  
 14 MR WELCH: I can't resolve the "A" feature. When I put  
 15 a single arrow there, I'm saying there's dissimilarity  
 16 in that character: the size of it, the placement of the  
 17 bottom stroke, cross-stroke at the bottom of it, the  
 18 relationship and position of that particular stroke.  
 19 I didn't put a bunch of arrows in this particular  
 20 case because in a handwriting examination like this,  
 21 because I'm only dealing with literally two characters,  
 22 the opinion and indications opinion according to SWGDOC  
 23 guidelines is a very weak opinion.  
 24 So there are limitations definitely associated with  
 25 an evaluation like this. But there are some handwriting

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12:55 1 habits that are in agreement between the four initials  
 2 of Mr Avraham Lev Ran and the known initials of his from  
 3 C0330.7 through C0330.9.  
 4 THE PRESIDENT: Thank you.  
 5 MR WELCH: You're welcome.  
 6 THE PRESIDENT: Now I stop interrupting you, although  
 7 I would have other questions on the similarities, just  
 8 from reading your report. But I think we can come back  
 9 to these questions later on if they are not covered by  
 10 the parties in their questions.  
 11 I look at my watch, and I ask the Secretary: we have  
 12 now spent 1 hour 17, deducting the interruptions by  
 13 questions of the Tribunal. We had said an hour, now we  
 14 are already over it. I will not cut you off of course,  
 15 but try to limit your further explanations. We are  
 16 still at Lev Ran, so I know that there is a number of  
 17 other signatures to come.  
 18 MR WELCH: Yes, ma'am.  
 19 THE PRESIDENT: How do you want to do this?  
 20 MR WELCH: I can go through the evaluation of those, and the  
 21 characteristics as far as genuineness, rather quickly --  
 22 THE PRESIDENT: Fine. So please do that, yes.  
 23 MR WELCH: Okay, let's go to 102.  
 24 On page 102, this is the questioned signature on  
 25 R-27 of Mr Marc Struik. As you can see, again all the

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12:57 1 characteristics that I've talked about of genuineness  
 2 are exhibited in this handwriting characteristic. This  
 3 is a complex signature: it has approximately  
 4 20 different movements in the signature. You can see  
 5 that the line quality is nice: even edges, variations in  
 6 line widths, movement into and out of the strokes. So  
 7 there's no evidence of forgery commonly associated with  
 8 traced or simulated forgeries there.  
 9 We can go next to [page] 113 and look at the  
 10 Avidan Asher signature on R-28. Again, a complex  
 11 signature: it has about 19 different movements in this  
 12 particular signature. Again, no evidence commonly  
 13 associated with traced or simulated forgeries. Pen  
 14 pressure, pen pressure variation, flying starts,  
 15 finishes, varying line widths.  
 16 We can go to the next one, which is page 122.  
 17 Here's a signature on R-29 of Avidan Asher. Just like  
 18 the other signatures, very fluently and naturally  
 19 written. No evidence of simulated or traced  
 20 characteristics, of simulated or traced forgeries. Nice  
 21 even smooth lines, pen drags, pressure variation, hooks,  
 22 feathering in the strokes and in the diacritics.  
 23 We can go to page 104, for purposes of time. Each  
 24 and every one of these Lansana Tinkiano signatures were  
 25 very fluently and naturally written. I then did

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13:01 1 an inter-comparison between the three questioned  
 2 signatures, evaluating individual identifiable  
 3 handwriting characteristics, and here are the blue  
 4 arrows representing some of the similarities that were  
 5 noted.  
 6 Then we can go to page 193. These are the  
 7 Mamadie Touré signatures that I compared, pointing out  
 8 some of the similar handwriting characteristics in all  
 9 of these questioned signatures. Mind you, for the  
 10 Lansana Tinkiano and the Touré signatures, I didn't have  
 11 any known comparator signatures to compare them with.  
 12 And again I've rendered an indication: may have been  
 13 written by the same person, for each of these  
 14 signatures.  
 15 That essentially concludes the results of the  
 16 handwriting examinations.  
 17 THE PRESIDENT: Thank you.  
 18 MR WELCH: You're welcome.  
 19 THE PRESIDENT: So that concludes your initial presentation.  
 20 We would now take the lunch break, and then we would  
 21 resume at 2 o'clock, if that's fine with everyone, and  
 22 would then give the Claimants time for their questions  
 23 to the experts. We have provided for 75 minutes: is  
 24 that what you anticipate to need?  
 25 MR LIBSON: We've planned to try and keep within that, but

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13:03 1 there is quite a lot to go through. Of course,  
 2 afterwards we have an additional 45 minutes for either  
 3 party as well this afternoon.  
 4 THE PRESIDENT: Sorry?  
 5 MR LIBSON: This afternoon we also have follow-up, we have  
 6 a session for follow-up questions as well.  
 7 THE PRESIDENT: Yes, yes. We are going to have a long  
 8 afternoon.  
 9 MR LIBSON: We are. We're looking forward to it!  
 10 THE PRESIDENT: That I can promise you, that's the only  
 11 thing!  
 12 Should we start at 1.45, having heard that? Maybe  
 13 that's more cautious, yes. Let's start again at 1.45.  
 14 I should tell you, gentlemen, that while you are on  
 15 the witness stand, you should please not speak to anyone  
 16 about -- I mean, between the two of you, of course, but  
 17 not to anyone else about your testimony or your  
 18 evidence. Thank you.  
 19 Have a good lunch, everyone.  
 20 (1.04 pm)  
 21 (Adjourned until 1.45 pm)  
 22 (1.53 pm)  
 23 THE PRESIDENT: So now we are ready to resume, and I give  
 24 the floor to the Claimants for their questions.  
 25 Mr Daele.

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13:53 1 MR DAELE: Thank you very much, Madam President.  
 2 Examination on behalf of Claimants  
 3 MR DAELE: This morning before you entered the room, we  
 4 heard from the Secretary of the Tribunal that you met  
 5 each other yesterday, in the late afternoon, to hand  
 6 over the documents that we then received last night.  
 7 Can you confirm that Mr Garel yesterday, when you met,  
 8 reminded you of the provisions of PO17, so that the  
 9 documents that you were going to file were not allowed  
 10 to include information that was not on the record?  
 11 A. (Mr LaPorte) Can I consult with Mr Welch? (The experts  
 12 confer) Yes, can you just be more specific?  
 13 Q. Did Mr Garel remind you of paragraphs 19 and 20 of PO17,  
 14 that provide that the documents that we or the  
 15 Tribunal-appointed experts were going to file should not  
 16 include information that was not already on the record?  
 17 A. (Mr LaPorte) Yes, I didn't recall -- Mr Garel, he didn't  
 18 see our presentation, so I don't know if he knew what  
 19 was in it. But no, I did not --  
 20 Q. My question was whether he reminded you of that  
 21 provision.  
 22 A. (Mr LaPorte) No, I don't recall that. That's why  
 23 I was -- I guess I can respond for me in this case --  
 24 Q. Mr Welch, do you remember?  
 25 A. (Mr Welch) I don't recall specifically. He may have;

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13:55 1 I just don't recall.  
 2 Q. Did you tell him, did you confirm that the documents did  
 3 not include new information, or information that was not  
 4 yet on the record?  
 5 A. (Mr LaPorte) Once again, I'll speak for myself, just  
 6 based on what I recall.  
 7 No, we presented -- gave him the information, but  
 8 I don't think Mr Garel knew what was -- all the  
 9 information that we were turning over.  
 10 Q. And Mr Welch?  
 11 A. (Mr Welch) Yes, I'm not really clear on what  
 12 specifically you're asking about.  
 13 Q. My question is: did you tell Mr Garel that the documents  
 14 you were handing over did not include information that  
 15 was not yet on the record? It's a clear question.  
 16 A. (Mr Welch) Yes, I did not, no.  
 17 Q. You did not, okay. Are you of the opinion that the  
 18 documents that you provided, do these documents include  
 19 information that was not yet on the record?  
 20 A. (Mr LaPorte) So we are referencing -- just so we're  
 21 clear for the record, you're referencing the PowerPoint  
 22 presentations that we turned over to --  
 23 Q. Yes, and the other documents. So there are two  
 24 PowerPoint presentations, and then there was a third  
 25 document.

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13:56 1 A. (Mr LaPorte) So when you say "not on the record",  
 2 everything in the presentation was -- as far as we -- so  
 3 I don't know what was on the record. But as far as  
 4 I know, what I received was -- for example, I received  
 5 a report from Mr Radley in response to our final report.  
 6 So to me, that was on the record.  
 7 Q. So Mr Radley's report was on the record. Was your  
 8 response to Mr Radley's report on the record?  
 9 A. (Mr LaPorte) Well, we --  
 10 Q. Yes or no?  
 11 A. (Mr LaPorte) Well, no, it wasn't at the time. That's --  
 12 we were providing it to Mr Garel to be on the record.  
 13 Q. So by providing these documents -- because these  
 14 documents do include your response to Mr Radley's  
 15 report?  
 16 A. (Mr LaPorte) That's correct, yes.  
 17 Q. But that information was not on the record yet?  
 18 A. (Mr LaPorte) No, it was not on the record yet, yes.  
 19 Q. But paragraphs 19 and 20 provide that these documents  
 20 should not include information that was not on the  
 21 record yet.  
 22 A. (Mr LaPorte) So that's where I think we're confused,  
 23 because the information was already on the record.  
 24 That's my --  
 25 Q. So your response, your views on Mr Radley's report, can

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13:57 1 you identify where it was on the record?  
 2 A. (Mr LaPorte) It was on the record because it was turned  
 3 over to us.  
 4 Q. No, no, that's Mr Radley's report.  
 5 A. (Mr LaPorte) Yes.  
 6 Q. Your response to Mr Radley's report, where was that on  
 7 the record?  
 8 MR OSTROVE: (In English) With respect, I have to object to  
 9 this line of questioning, which is highly misleading.  
 10 There has been a misstatement of what PO17 states in  
 11 paragraphs 19 and 20.  
 12 As we've already seen, paragraphs 19 and 20 refer to  
 13 on the one hand demonstrative exhibits, which have to be  
 14 material that is on the record, and paragraph 20 refers  
 15 to PowerPoints or slides accompanying presentations. So  
 16 to mix the two, and to claim that an argument that was  
 17 going to be in the presentation had to itself have  
 18 already been in the record is highly misleading, it's  
 19 highly prejudicial, it's going to create confusion, and  
 20 I strongly object to that line of questions.  
 21 A. (Mr Welch) Can I clarify my response to your question  
 22 also? Yes, he did bring this issue up, and --  
 23 MR DAELE: Now you remember?  
 24 A. (Mr Welch) Yes, specifically. And when he brought this  
 25 up to us, both Gerry and myself told him that any

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13:59 1 information that we're providing is information that was  
 2 already in the record: it was already in the annexes, it  
 3 was already images from our report. All that  
 4 information was already in the record.  
 5 Q. Your response, again, to Mr Radley's report, was that on  
 6 the record? And if so, please identify why --  
 7 THE PRESIDENT: I think he has already answered this  
 8 question. Obviously the response to Mr Radley's  
 9 comments was not in the record; how could it have been?  
 10 MR DAELE: That's my question.  
 11 A. (Mr Welch) The images that we used, and the information,  
 12 was in the record.  
 13 PROFESSOR VAN DEN BERG: To make it abundantly clear, if  
 14 I may, what did the Secretary of the Tribunal, Mr Garel,  
 15 exactly tell you yesterday, at what time?  
 16 A. (Mr Welch) He said, "Any information that you provide  
 17 must already have been in the record". And we had this  
 18 discussion: we said, "Everything in my PowerPoint --  
 19 everything in our PowerPoints, all the images are  
 20 information that was already in the report and the  
 21 annexes".  
 22 PROFESSOR VAN DEN BERG: He reminded you about PO17?  
 23 A. (Mr LaPorte) He didn't cite those numbers.  
 24 PROFESSOR VAN DEN BERG: Okay, thank you.  
 25 THE PRESIDENT: I think we can carry on. This seems

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14:00 1 answered.  
 2 MR DAELE: Can I use this document (indicating)? It's one  
 3 of the PowerPoint presentations.  
 4 THE PRESIDENT: Well, somehow you will have to make choices.  
 5 You asked us not to consider it, and now you want us to  
 6 consider it, so I'm a little -- I'm not clear about what  
 7 you wish to do.  
 8 MR DAELE: I wish to demonstrate that one of the statements  
 9 that was just made, that the information was already in  
 10 the report, so I want to show one particular image and  
 11 ask the experts to show me where that image was in the  
 12 final report.  
 13 THE PRESIDENT: Fine, so we note that you wish to rely on  
 14 the PowerPoint, and you would have to identify --  
 15 MR DAELE: Well, I want to rely on that one particular page;  
 16 not on the entire PowerPoint presentation, but on this  
 17 one particular page.  
 18 THE PRESIDENT: As we said this morning, if we refer to  
 19 certain pages, then they will become part of the record.  
 20 But you may go ahead of course, with this specification.  
 21 MR DAELE: In the documents that you provided to Mr Garel,  
 22 was there, for example, an image of an analysis of the  
 23 movement or the formation of Mr Lev Ran's signature?  
 24 A. (Mr Welch) No, there was not an image of -- what  
 25 I provided in the PowerPoint, there was not an image of

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14:02 1 the movement in the report. But it was based -- or  
 2 essentially, the observations that I'd made [were] based  
 3 on evidence that were in the records when I did my  
 4 examination.  
 5 Q. But is there an image in the final report?  
 6 A. (Mr Welch) No.  
 7 Q. No. But there is such an image in the documents that  
 8 you filed yesterday?  
 9 A. (Mr Welch) Absolutely.  
 10 A. (Mr LaPorte) If I can just add to that, that image that  
 11 we used was part of the annexes that we originally --  
 12 were part of our final reports. This is not a new image  
 13 that we made up.  
 14 Q. Okay. Let me move on to the final report then.  
 15 In paragraph 9 you take the position that BSGR has  
 16 engaged in expert shopping. Can you explain on the  
 17 basis of what evidence you took that position?  
 18 A. (Mr LaPorte) I'm sorry, I'm just going to refer to  
 19 paragraph 9.  
 20 Q. It's in the first line. You make the suggestion that  
 21 BSGR engaged in shopping for an expert. Can you tell us  
 22 on what basis you came --  
 23 A. (Mr LaPorte) First of all, our statement says, "it  
 24 appears", so we don't make an affirmative allegation.  
 25 We say, based on our 50 years of experience, that when

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14:04 1 an expert is retained, and then that expert then goes  
 2 away and doesn't issue any kind of report, and a new  
 3 expert comes in, that's usually because -- once again,  
 4 based on our experience -- it appears that the Claimants  
 5 were seeking another expert, because the original expert  
 6 did not have findings that supported your position.  
 7 Q. So this is an assumption?  
 8 A. (Mr LaPorte) Once again, that's why we said, "it  
 9 appears". And we went on to say, in the entire  
 10 paragraph, that first of all this was just our  
 11 transparency in communicating to the Tribunal that this  
 12 is something that does occur. It's not -- as far as  
 13 I know, from a legal perspective it's not not permitted,  
 14 it's not something that's not permitted; you're allowed  
 15 to do that sort of thing. I've seen it quite often.  
 16 I've been the second expert that has come into a case,  
 17 so I've been part of that too.  
 18 Q. Can we go to paragraph 11, the bottom corner there. It  
 19 says:  
 20 "It seems obvious that BSGR made their request for  
 21 an extension because the 'original experts' did not  
 22 dispute ..."  
 23 Can we go down?  
 24 A. Yes.  
 25 Q. So here you say, "It seems obvious". So this is

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14:05 1 a stronger wording, because what you're describing here  
 2 is again this practice of expert shopping, and here you  
 3 said, "It seems obvious".  
 4 A. (Mr LaPorte) "It seems"; not "It is". It seems pretty  
 5 obvious, because of the circumstances where there was no  
 6 request -- at least when we received the request for the  
 7 extension or we were asked if we were okay with the  
 8 extension, it was at the very last minute: it was just  
 9 prior to the deadline.  
 10 Q. But then in the last line of that paragraph, you say:  
 11 "In [your] opinion, BSGR did not, in good faith,  
 12 disclose their reasoning ..."  
 13 This is affirmative, no? It says:  
 14 "In [your] opinion, BSGR did not ..."  
 15 This is an affirmative statement, disclosed in good  
 16 faith?  
 17 A. (Mr LaPorte) It's in our opinion, that's what we're  
 18 saying. Once again, we're trying to be transparent.  
 19 And based on our duties to the Tribunal, it's to notify  
 20 that we have a genuine concern that there was something  
 21 that was going on.  
 22 Once again, we didn't have all the facts, we didn't  
 23 know all the facts, we weren't making any of those --  
 24 those were things that we were notifying the Tribunal  
 25 of, for them to just take note of.

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14:07 1 Q. Did you ask for the facts? Did you ask BSGR?  
 2 A. (Mr LaPorte) Then that becomes a legal -- because we  
 3 don't know all the procedural -- we're just here as the  
 4 experts --  
 5 Q. But you are aware, under paragraph 8 of the terms of  
 6 reference: if you wanted information from the parties,  
 7 you were entitled to ask for information. Were you  
 8 aware of that provision?  
 9 A. (Mr LaPorte) Yes, but I believe that pertains to  
 10 information related to the examination of the documents;  
 11 at least that was our interpretation.  
 12 Q. What are, let's say, the key components of shopping for  
 13 an expert?  
 14 A. (Mr LaPorte) So I think the first thing -- and Mr Welch  
 15 can add if I miss [anything] -- the first thing is there  
 16 were two experts that were retained by BSGR that  
 17 attended a four-day inspection in New York City. Those  
 18 two individuals were there for the entire inspections,  
 19 both of them were there, they observed everything that  
 20 was going on. Then there was this last-minute request  
 21 to extend the deadline. And then there were no comments  
 22 about the preliminary report from the originally-hired  
 23 experts.  
 24 But suddenly Mr Radley then came into the picture,  
 25 who -- and just by the way, I know Mr Radley, we're

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14:08 1 colleagues. He's a great guy, he's a professional;  
 2 I have nothing against Mr Radley at all. So this has  
 3 nothing -- this is not a personal -- anything personal  
 4 attack or professional attack on Mr Radley. He's  
 5 well -- I think he's been doing forensic document  
 6 examination for many, many years, and he is well  
 7 respected. I have tremendous respect for Dr Radley. So  
 8 this is nothing about Dr Radley -- or Mr Radley.  
 9 So now a new expert comes in who wasn't at the  
 10 inspection at all. So we spent four days doing these  
 11 intensive examinations, with people staring at us for  
 12 the whole time. Mr Radley wasn't there, but now  
 13 suddenly Mr Radley comes into the picture. There was no  
 14 explanation of why he was there.  
 15 And then the questions that we received from  
 16 Mr Radley -- which are fair and appropriate -- there was  
 17 no background information with the questions. The  
 18 questions were just kind of open-ended, which then  
 19 leaves the reader to sort of -- could lead the reader to  
 20 misunderstand the outcomes --  
 21 Q. We'll come to that later. But you haven't really  
 22 answered my question. My question was: what are the key  
 23 components of the practice of expert shopping?  
 24 THE PRESIDENT: I think the answer goes to this: if  
 25 I understand it correctly, you were listing the

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14:10 1 components, and the last one was that questions came in  
 2 that had no background based on the inspection. Is that  
 3 right?  
 4 A. (Mr LaPorte) That's correct.  
 5 THE PRESIDENT: Is there another component?  
 6 A. The last component would simply be that we received no  
 7 comments, queries or questions from the original --  
 8 THE PRESIDENT: Which you originally noted, yes.  
 9 A. (Mr LaPorte) Yes.  
 10 MR DAELE: In paragraph 9 of your statement you say:  
 11 "... we commonly refer to in our industry as  
 12 'shopping for an expert'.  
 13 So there is something in the industry -- you refer  
 14 to it -- that is known [by] all practitioners, known as  
 15 "shopping for an expert". These are your words. And  
 16 then I think you try to define it, because you then add:  
 17 "That is, parties are known to seek out an expert to  
 18 advocate on their behalf."  
 19 So it is not neutral, it's not just replacing  
 20 experts; it is replacing one expert by another who will  
 21 advocate on behalf -- these are the words in your  
 22 statement. Do you stand by these words?  
 23 A. (Mr LaPorte) So when we say "advocate", that would mean  
 24 that they have the position -- or they will render  
 25 an opinion or have a position that supports your

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14:11 1 proposition or the parties' proposition.  
 2 Q. Yes, and that is why they are selected?  
 3 A. (Mr LaPorte) Yes, but it's done -- once again, you're  
 4 asking me about what's legally allowable. As  
 5 an expert --  
 6 Q. No, I'm asking you what you write about in your report.  
 7 You describe the concept of "expert shopping", and I'm  
 8 trying to test what you mean, or what in the industry is  
 9 meant by "expert shopping". And here in your expert  
 10 report you say:  
 11 "That is, parties are known to seek out an expert to  
 12 advocate on their behalf."  
 13 A little bit further in the same paragraph, you  
 14 assume that the original experts:  
 15 "... have not issued any comments of findings with  
 16 respect to their observations of the extensive testing  
 17 that took place during the inspection phase and  
 18 presumably reviewing the materials we provided. In some  
 19 cases, when an expert provides conclusions to a party  
 20 that do not significantly deviate from an opposing  
 21 expert and do not support the position of their client  
 22 then the party may seek out another expert that will  
 23 support their position."  
 24 A. (Mr LaPorte) Right.  
 25 Q. So I am saying that this paragraph here -- and we can go

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14:12 1 back to 11 as well, where you have the same kind of  
 2 idea. You say we made the request:  
 3 "... because the 'original experts' did not dispute  
 4 the testing we performed or our final conclusions, and  
 5 then [we] likely began [to] search for the 'new  
 6 expert'.  
 7 So this is not a neutral exercise. You assume first  
 8 of all that the original experts were basically agreeing  
 9 with your analysis, and that is why we changed the  
 10 experts. Is that the concept of "expert shopping"?  
 11 A. (Mr LaPorte) That's part of the concept, yes.  
 12 Q. So you assume here that this is what happened?  
 13 A. (Mr LaPorte) No, once again, we didn't assume. We  
 14 didn't assume anything. We didn't make this allegation.  
 15 We advised the Tribunal that this is a common practice.  
 16 I've been the expert who has been shopped upon, and I've  
 17 been on the other side, where multiple experts come in  
 18 afterwards, when the first expert agrees with my  
 19 findings. I've personally experienced this numerous  
 20 times in my career.  
 21 And all we're saying -- this has no bearing on our  
 22 conclusions. We issued our conclusions in our  
 23 preliminary report. It's not a biased statement in any  
 24 way. It's just saying that we find this practice  
 25 a little unusual, especially when two board-certified

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14:14 1 examiners attended the inspection over a course of at  
 2 least 40 hours in New York City, and then they're not  
 3 heard from at all.  
 4 Q. You place a lot of emphasis on the fact that they were  
 5 there in New York. But in New York you did not share  
 6 any of your findings, did you?  
 7 A. (Mr LaPorte) No, but they had a wonderful opportunity to  
 8 watch everything that was going on, and then they had  
 9 the opportunity to ask us questions.  
 10 Q. But you did not share any findings, conclusions. It was  
 11 basically collecting evidence, where we and the  
 12 party-appointed experts were sitting, you know, 1 metre  
 13 away from the table where you were doing your exercises,  
 14 and you even put papers on the table to make sure that  
 15 we wouldn't actually see what was happening?  
 16 A. (Mr LaPorte) Yes. In all fairness --  
 17 Q. So that's what you describe as "a wonderful  
 18 opportunity"?  
 19 A. (Mr LaPorte) Well, if you didn't think it was  
 20 a wonderful opportunity, then you wouldn't have sent  
 21 people there, right? I mean, it's a wonderful  
 22 opportunity. If I'm another expert on the opposing  
 23 side, I would be counselling or advising my client that  
 24 it would be a really good idea for me to attend the  
 25 inspection, and then also have the opportunity to ask

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14:15 1 questions at the end of each session.  
 2 But in all fairness to your point, we did not have  
 3 any findings or results during the time in New York. We  
 4 collected information, we made our observations. And  
 5 when I say "findings", that's more of a results-type  
 6 thing. We didn't form any conclusions at the time.  
 7 Q. Are you aware that one of the original experts disagrees  
 8 with your suggestion of expert shopping, Mr Dennis Ryan?  
 9 A. (Mr LaPorte) Yes, I don't -- I'm not sure I would  
 10 interpret that the same as you.  
 11 Q. Well, if I read -- it's under tab 38. But if I read, he  
 12 says -- and it's on page --  
 13 A. (Mr Welch) I'm sorry, can it be brought up?  
 14 Q. Tab 38 (C-376). It's on the second page.  
 15 A. (Mr Welch) Can you give us a moment so we can find it?  
 16 We don't have a monitor. (Pause)  
 17 Q. Halfway down the page, just before you see in the middle  
 18 "Extension of time", underlined, just before that:  
 19 "We therefore find the allegation of expert shopping  
 20 entirely unjustified."  
 21 A. (Mr LaPorte) So one of my first issues with this is that  
 22 Dennis Ryan is saying "we", right, and yet he is only  
 23 signing from himself. I don't see an independent  
 24 statement from Laura. So I do have a concern when one  
 25 person issues a statement about two people.

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14:18 1 But that aside, yes, I see what he says.  
 2 Q. So does that in any way affect your assumptions?  
 3 A. (Mr LaPorte) No. First of all, we didn't --  
 4 Q. But you assume that the reason for changing expert is  
 5 because the original expert does not agree with its  
 6 party, okay?  
 7 A. (Mr LaPorte) Yes, once again, we were advising the  
 8 Tribunal --  
 9 Q. And --  
 10 A. (Mr LaPorte) I'm sorry to interrupt. We did not make  
 11 an assertion that that's what was happening. We just  
 12 said: these are common characteristics that occur when  
 13 another party seeks out another expert.  
 14 A. (Mr Welch) This is a common practice.  
 15 Q. So why do you say, "In our opinion, BSGR did not, in  
 16 good faith, disclose their reasoning for an extension"?  
 17 A. (Mr LaPorte) We never heard the reason for the  
 18 extension. We never received any information about it.  
 19 A. (Mr Welch) And it certainly wasn't disclosed to us at  
 20 the time what the reasons were.  
 21 Q. Is it common practice to accuse parties of bad faith?  
 22 A. (Mr LaPorte) Well, we --  
 23 Q. Or failing to act in good faith?  
 24 A. (Mr LaPorte) So normally we wouldn't do that, because --  
 25 well, first of all, yes, when I worked for the

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14:19 1 government, when I worked for the US Secret Service and  
 2 I thought there was something that might have been in  
 3 bad faith, I would have notified the US attorney and  
 4 said, "I think that there's something inappropriate  
 5 here", and they can look into that. And in those cases,  
 6 those criminal cases, I'm a neutral expert, and I'm  
 7 allowed to convey that as a neutral expert.  
 8 Q. In the same paragraph 9, you state that a number of BSGR  
 9 comments "would not have been necessary had the '...  
 10 expert' been present". You see that?  
 11 A. (Mr LaPorte) Yes.  
 12 Q. Yes. How many queries fall under this category?  
 13 A. (Mr LaPorte) I didn't count and quantify the queries.  
 14 But there was probably -- if Mr Radley did attend the  
 15 inspection in New York City, I'm sure he would have had  
 16 follow-up questions that would have mitigated or at  
 17 least reduced the number of queries.  
 18 Q. There were 65 queries. Can you give us some indication?  
 19 Is it like 5, 10, 20, 30, 40?  
 20 A. (Mr LaPorte) I don't want to guess on the number. But  
 21 there were a number of them that, when we went through  
 22 them, we were like, "Well if Mr Radley was present, he  
 23 probably wouldn't have asked this question".  
 24 Q. If I tell you that in your responses in Annex L, there  
 25 were only 2 responses out of the 65 that referred to

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14:21 1 what took place in New York, does that sound reasonable  
 2 to you?  
 3 A. (Mr LaPorte) Well, that's because maybe that was direct  
 4 information. But like I said, I think -- I believe that  
 5 if Mr Radley was present at the inspection, he would  
 6 have been able to ask more questions that would have  
 7 alleviated --  
 8 Q. But the nature of the questions that the parties were  
 9 allowed to ask in New York was limited, wasn't it? The  
 10 nature?  
 11 A. (Mr LaPorte) The nature?  
 12 Q. Yes.  
 13 A. (Mr LaPorte) I don't ...  
 14 Q. Was there in the ...  
 15 A. (Mr LaPorte) I don't recall them being too limited.  
 16 I mean, they got to -- limited in the sense they were  
 17 allowed to ask questions about the examinations that  
 18 took place that day.  
 19 Q. Only technical questions about what exactly you were  
 20 doing; is that correct?  
 21 A. (Mr LaPorte) That's correct.  
 22 Q. Okay, thank you.  
 23 Now, in paragraph 12 you say that there is another  
 24 set of questions that were:  
 25 "... unnecessary if the [Preliminary Report] and the

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14:22 1 supporting data were reviewed thoroughly."  
 2 So is it your position here that BSGR and its expert  
 3 did not thoroughly review the data?  
 4 A. (Mr LaPorte) I'm sure that the data has been thoroughly  
 5 reviewed by now. But prior to the final report, there  
 6 were a lot of questions where if someone would have went  
 7 in and looked at all of the images, they may have been  
 8 able to answer those questions.  
 9 However, there were a lot of images that we took in  
 10 this particular instance. The report was very lengthy.  
 11 There was some information that I believe that we  
 12 provided in the descriptive section of our report, where  
 13 I thought some of the questions were -- if someone read  
 14 the front part of the report, and not just the results,  
 15 there would have been a lot of information that could  
 16 have been ascertained that way.  
 17 Q. Can you identify the number of questions that fall under  
 18 this category?  
 19 A. (Mr LaPorte) Once again, we didn't take our time to  
 20 tabulate all the questions --  
 21 Q. But you do know it's the majority, because you say it's  
 22 the majority. So that means more than 30?  
 23 A. (Mr LaPorte) There were many.  
 24 Q. In response to 13 of BSGR's questions, you say that:  
 25 "Any properly trained and competent forensic

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14:23 1 document examiner should arrive at the same or similar  
 2 conclusions based on the reasons and bases provided,  
 3 in addition to reviewing the appropriate image files  
 4 supplied with the [Preliminary Report]."  
 5 So any properly trained and competent expert would  
 6 come to the conclusions that you came to. Clearly  
 7 Mr Radley did not come to the conclusions that you came  
 8 to. So is it your position that therefore Mr Radley is  
 9 not a properly trained and competent expert?  
 10 A. (Mr LaPorte) No, no, of course not. Dr Radley is  
 11 a professional colleague and he's well trained and he's  
 12 well versed in this area. So I can only --  
 13 Q. Is he competent?  
 14 A. (Mr LaPorte) Of course he's competent, yes. We were not  
 15 making that allegation. What I'll say for the document  
 16 authentication part is that I don't believe Mr Radley  
 17 and us differ too much in our opinion about the ultimate  
 18 conclusions with respect to the document authentication.  
 19 The handwriting opinions, I'll turn over to  
 20 Mr Welch.  
 21 Q. Would you qualify Dr Radley as an advocate for the  
 22 party --  
 23 MR OSTROVE: I'm sorry, is it possible to let Mr Welch  
 24 answer the question before moving on to the next one?  
 25 MR DAELE: Absolutely.

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14:24 1 A. (Mr Welch) Yes. Okay, in your question, regarding your  
 2 last comment ...  
 3 MR DAELE: Do you qualify Mr Radley as an expert who  
 4 advocates for the party that has appointed him?  
 5 A. (Mr Welch) No, the --  
 6 THE PRESIDENT: Mr Welch has not answered the previous  
 7 question in connection with handwriting.  
 8 A. (Mr Welch) Yes. A properly trained and competent  
 9 examiner? Yes, absolutely. Based on the thoroughness  
 10 of our examination, all of the images, the  
 11 high-resolution images that we provide, yes, absolutely,  
 12 in my opinion a properly trained and competent forensic  
 13 document examiner should come to the same or similar  
 14 conclusion in this case.  
 15 Dr Radley obviously, as you indicated, did not. Do  
 16 I question his training and his competence? Absolutely  
 17 not. But we stand by the statement that it's our  
 18 feeling that a properly trained and competent examiner  
 19 should have arrived at the same or a similar conclusion.  
 20 MR DAELE: In paragraph 10 you raise what you call a "major  
 21 concern", and that is that BSGR would inevitably have  
 22 tainted its expert by providing three documents that had  
 23 a mark on it saying "forged".  
 24 A. (Mr LaPorte) Yes, we stand --  
 25 Q. And you qualify that as "highly inappropriate", and you

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14:26 1 say it is "inevitable" that BSGR has "tainted and  
2 biased" its expert.  
3 So is it your position now that Mr Radley is tainted  
4 and biased?  
5 A. (Mr LaPorte) No. So am I allowed to answer your  
6 question by going to the PowerPoint presentation that  
7 I prepared? Because I had a couple of slides that  
8 respond to that.  
9 THE PRESIDENT: As we have said this morning, you can refer  
10 to your specific slides if they do respond to a specific  
11 question. The difficulty that we will have doing this  
12 is that the slides are not numbered. And of course the  
13 Tribunal should be able to look at the slide as well.  
14 We will see on the screen. (Pause)  
15 The actual presentation has numbers, so we can  
16 identify the page by that. Can the person showing the  
17 slide again show it with the --  
18 A. (Mr LaPorte) Yes, it's right up there. So it'll say --  
19 oh, it says here -- it's slide 27.  
20 THE PRESIDENT: No, it says --  
21 A. (Mr LaPorte) Yes, it doesn't say on there. It says on  
22 here for me. But it's slide 27.  
23 THE PRESIDENT: Can we see it again, where on the left-hand  
24 side we have the different slides with the numbers? If  
25 it's not full screen, we will necessarily see it. You

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14:27 1 have to go out of full screen.  
2 A. (Mr LaPorte) I think I can do it this way.  
3 THE PRESIDENT: Yes, absolutely.  
4 A. (Mr LaPorte) So slide 27.  
5 THE PRESIDENT: We will proceed in that way when you need to  
6 refer to a slide.  
7 A. (Mr LaPorte) We can do it in that form? Yes, that's  
8 fine.  
9 So to answer your question now, this is a very  
10 common -- it's an area of immense interest in the  
11 forensic sciences now. This is called "context bias".  
12 This is what we call the tendency -- so by definition --  
13 so there's a document that has been issued by the  
14 Forensic Science Regulator in the United Kingdom, and in  
15 the United States we are kind of following this similar  
16 type of guidance. But in that document -- which we  
17 provided as well too -- is a definition of what's called  
18 "contextual bias", and that's the tendency for  
19 consideration to be influenced by background  
20 information.  
21 So when you give a forensic examiner -- not just  
22 a forensic document examiner -- information that's not  
23 necessarily pertinent to the investigation or to the  
24 analysis, then you can taint the expert. However, there  
25 is a statement that's put out by the regulator, and it

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14:29 1 says, if we go right to the bottom of this stuff, it  
2 says, "but it can have an influence and should be  
3 guarded against".  
4 So it doesn't mean Mr Radley has been tainted.  
5 We're not making that assertion in any way. Mr Radley  
6 asked about a document -- or two documents that we had  
7 no idea existed. They were not part of the disputed  
8 documents and they were not in the comparator documents,  
9 and they weren't referenced in our report in any way.  
10 So we were taken aback when we heard about these  
11 documents that were marked "forged" on them. And then  
12 Dr Radley -- or Mr Radley had a series of questions that  
13 followed that, about: did we see those, did we look at  
14 those, what was our opinion of them, and so forth. But  
15 we had not seen those documents.  
16 MR DAELE: But you say now that an expert can be biased, but  
17 here in your statement you say it is "inevitable".  
18 A. (Mr LaPorte) No, I'm saying that it's possible for  
19 someone to be biased. When you retain -- and I'm not  
20 talking about "you" in general. But when a party in  
21 general retains an expert and says, "Here are some  
22 documents and they say 'forged' all over them, but  
23 they're not part of the documents that are supposed to  
24 be examined", you've now provided information to just  
25 Mr Radley, but that information --

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14:31 1 Q. Would you be biased if you received from a party that  
2 kind of document?  
3 A. (Mr LaPorte) And what I'm saying is I'm not saying --  
4 Q. No, I'm asking --  
5 A. (Mr LaPorte) -- or alleging that people get biased; I'm  
6 just saying there's a possibility. So I've taken  
7 training in this area; that doesn't mean that I can't be  
8 biased in any way. All humans can be biased to  
9 a certain extent. Certainly I know how to look out for  
10 it, and when I speak with clients I tell them that  
11 I don't need to know any other extraneous information.  
12 MR OSTROVE: For the record, we have moved to slide 28,  
13 which follows slide 27.  
14 A. (Mr LaPorte) Sorry.  
15 MR DAELE: I still have a number of questions. But in light  
16 of the time, and the fact that we still have a follow-up  
17 session, I'm going to hand over to my colleague  
18 Mr Libson to continue with a series of questions.  
19 THE PRESIDENT: The follow-up session comes after the  
20 questions from the Tribunal. It is meant to be  
21 a follow-up session on the questions of the Tribunal.  
22 So if the Tribunal asks no question about this -- and  
23 I have no idea whether it will or not -- there's a good  
24 argument to say that you should not be able to follow up  
25 on something that was never asked.

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14:32 1 That's a long explanation to say: if you have more  
2 questions on this topic, you should please ask them now.  
3 And we are aware of the time, and we hope we will manage  
4 the best we can.  
5 MR LIBSON: I will go through my questions, and then  
6 hopefully we will have some time at the end for Mr Daele  
7 to come back to his questions. Thank you.  
8 Mr LaPorte, can we turn to Annex 1 of the terms of  
9 reference. It should be tab 2 in your bundle in front  
10 of you. Have you got it?  
11 A. (Mr Welch) Yes.  
12 Q. Thank you. If you look at page 8 and read your response  
13 to question 1. I'll read it for the record. The  
14 response says:  
15 "As background, to determine the authenticity of  
16 a document (was it created and executed on its purported  
17 date?), there are physical, optical, and chemical tests  
18 that can be performed as part of the forensic document  
19 examination."  
20 So according to this answer, whether a document is  
21 authentic is whether it was created and executed on its  
22 purported date; is that right?  
23 A. (Mr Welch) Correct.  
24 Q. And your role as Tribunal-appointed experts was to  
25 assist the Tribunal in ascertaining the authenticity of

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14:34 1 the disputed documents? That's at paragraph 3 of the  
2 terms of reference, at tab 1, page 2. I think it's set  
3 out at the beginning of your report as well.  
4 A. (Mr Welch) I'm sorry, can you make a reference to that?  
5 Q. Tab 1, page 2, paragraph 3 of the terms of reference.  
6 Tab 2, sorry. Tab 2.  
7 A. (Mr LaPorte) Tab 2?  
8 Q. My apologies. Page 2:  
9 "... to assist the Tribunal in ascertaining the  
10 authenticity of the Disputed Documents ..."  
11 A. (Mr LaPorte) Yes.  
12 Q. Yes? Going back -- sorry to turn back -- to Annex 1, in  
13 that tab at page 9, can you read out the first  
14 sentence -- or I will read out the first sentence of  
15 your response to question 3:  
16 "When documents are 'supposed' to have been created  
17 is irrelevant to a forensic examination because part of  
18 the examination may be to establish whether or not the  
19 documents were, in fact, created on their purported  
20 dates."  
21 A. (Mr Welch) Sorry, where are you at?  
22 Q. Tab 2, page 9. (Pause to locate the document)  
23 A. (Mr Welch) Okay, now we have it.  
24 Q. So:  
25 "When documents are 'supposed' to have been created

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14:36 1 is irrelevant to a forensic examination because part of  
2 the examination may be to establish whether or not the  
3 documents were, in fact, created on their purported  
4 dates."  
5 Yes, you've got that?  
6 A. (Mr Welch) Yes.  
7 Q. So what techniques exist to determine in fact that  
8 a document was created on a particular date?  
9 A. (Mr LaPorte) So that's very difficult, as I outlined  
10 this morning. Generally speaking, when I talked this  
11 morning about having the security code, the CPS code on  
12 a document, that can tell us the date when it was  
13 printed. That only happens on certain -- from certain  
14 manufacturers. So that would be one. But generally, to  
15 try and determine the exact date when something is  
16 signed from a forensic standpoint is very difficult.  
17 Q. Okay. I want to point you to your conclusions in your  
18 report on two documents, and if you take it from me that  
19 the answers are in identical form. They are  
20 paragraphs 160 and 177 of your report. If we go to  
21 paragraph 160. It's at tab 1?  
22 A. (Mr Welch) What page number is it?  
23 Q. Page 110.  
24 A. (Mr Welch) 110, thank you.  
25 A. (Mr LaPorte) Yes, if you could use the page number, that

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14:38 1 would be good.  
2 Q. Okay. So that paragraph reads:  
3 "R-28 is a one page document purportedly prepared on  
4 27 February 2008. Although this document is dated  
5 27 February 2008, which is indicated in the machine  
6 printed text ..."  
7 You mean the typed text, I think, there:  
8 "... there is no definitive date for when the  
9 document was executed with the signatures since there is  
10 no written date or legalization date. Therefore, our  
11 conclusions with respect to R-28 are based on the  
12 assumption that R-28 was prepared and signed on or  
13 around 27 February 2008."  
14 A. (Mr LaPorte) Yes.  
15 Q. And then you make the same assumption for R-29.  
16 A. (Mr LaPorte) Yes, so I think there might be  
17 a misunderstanding here. What we're saying here is that  
18 the document has a machine-printed date of  
19 27th February 2008. What we're doing is we're using  
20 that as the earliest date the document would have been  
21 produced.  
22 So we're -- maybe -- I apologise, because maybe the  
23 "assumption" term that we used has been taken out of  
24 context. What we're saying is: you know what, if  
25 somebody prints a document and it's dated February 27th

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14:39 1 2008, we're using that as the default date of the  
 2 document.  
 3 Q. Why would that be the earliest date the document would  
 4 have been produced, based on what you say gives rise to  
 5 the assumption?  
 6 A. (Mr LaPorte) Okay, so there was supposed to be  
 7 a signature; there was no signature or date assigned  
 8 with the signature on that date. There was no date  
 9 assigned or written on the document. So what we're  
 10 saying is: if you're going to produce -- you print  
 11 a document February 27th 2008; it could be signed  
 12 a month later. We don't know that.  
 13 Q. Sorry, but I don't understand why that is the earliest  
 14 date it could be produced. I could create a document  
 15 today that is dated February 27th 2008.  
 16 A. (Mr LaPorte) Yes, what we're saying: is if someone has  
 17 a document that's dated February 27th 2008, we're  
 18 just -- remember, we're neutral experts, we're right in  
 19 the middle, and we have to make the assumption that the  
 20 date that's being purported is the date that we have to  
 21 work with.  
 22 Q. Why do you have to make an assumption at all?  
 23 A. (Mr LaPorte) We're not making an assumption. We're just  
 24 saying that that's the date that we're using as our  
 25 reference, right? I can't say, "Oh, well, it was

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14:40 1 produced in 2014 and then somebody backdated the  
 2 document". What we're saying is: that was the date on  
 3 the document.  
 4 Q. You're not saying that. You say the assumption is it  
 5 was created on that [date]. You're not saying that that  
 6 is the date that's on the document.  
 7 A. (Mr LaPorte) No, and I think this is where we're getting  
 8 confused. I'm not making a definitive conclusion that  
 9 it was created and dated on February 27th 2008. We're  
 10 only using that as a reference point.  
 11 Q. Well, it doesn't read like that.  
 12 A. (Mr LaPorte) And that's why I apologise that it  
 13 shouldn't read like that. All we're saying is that  
 14 that's our reference date that we're using. That's it.  
 15 Q. We turn to this point -- and we'll come back to this  
 16 quite a lot -- we turn to this point in question 38 of  
 17 our questions to you in Annex L, and we ask you to set  
 18 out the evidence that gave rise to the assumption. That  
 19 is in tab 21, page 22.  
 20 A. (Mr LaPorte) What paragraph?  
 21 Q. Question 38, and it's page 22 of tab 21. We ask the  
 22 question:  
 23 "Please set out with full particularity the  
 24 scientific basis on which the [Preliminary Report]  
 25 concludes that R-28 was prepared and signed on ...

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14:42 1 27 February 2008 ..."  
 2 A. (Mr LaPorte) Yes, so I believe -- and this might --  
 3 I believe we have a little miscommunication here. So we  
 4 are using February 27th 2008 as a default date on the  
 5 document, and what we're saying is: based on all of the  
 6 evidence, there was no evidence to indicate that it was  
 7 created and produced at any other time than  
 8 February 27th 2008. There was no evidence to suggest it  
 9 was done otherwise.  
 10 Q. But that is not what you say. You do not say, "There is  
 11 no evidence to suggest it was created on another date".  
 12 You say in the report -- and we gave you the opportunity  
 13 to change the report -- that the assumption was that it  
 14 was created on that date. Don't look at the answer now.  
 15 I'm talking about -- the answers to the questions --  
 16 A. (Mr LaPorte) Yes.  
 17 Q. -- were to give you the ability to change your  
 18 conclusion in the final report.  
 19 THE PRESIDENT: I think in fairness to the expert, he can  
 20 read his answer to refresh his recollection.  
 21 MR LIBSON: Of course. I thought he had read his answer.  
 22 No, of course I accept that. But ...  
 23 A. (Mr LaPorte) So what we did was we repeated -- and we  
 24 still stand by this opinion -- at the end, where we say:  
 25 "... there is no evidence to indicate that R-28 was

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14:43 1 created and executed on any other date than purported."  
 2 Q. But that's not what the report says.  
 3 A. (Mr LaPorte) Yes, it does.  
 4 Q. No, it doesn't.  
 5 A. (Mr LaPorte) Yes, it's the final conclusion that R-28 is  
 6 part of the disputed documents. This is not a -- first  
 7 of all, this is not a separate conclusion. We would  
 8 never make a conclusion in the middle of the report.  
 9 Q. We asked you to set out the entirety.  
 10 A. (Mr LaPorte) No, but ...  
 11 Q. You say you wouldn't make a conclusion in the middle of  
 12 the report, but in paragraph 160 this is the language:  
 13 "Therefore, our conclusions with respect to R-28 are  
 14 based on the assumption that it was prepared on or  
 15 around 27 February 2008."  
 16 A. (Mr LaPorte) No, what we're saying is: the conclusions  
 17 that we're going to make later on will be based on  
 18 a purported date of 27th February 2008. That was our  
 19 default. This is no different than if somebody signs  
 20 a document and dates it today, and then we get it in  
 21 five years from now, my assumption is that's when it was  
 22 signed and dated to begin with.  
 23 What we're saying -- and question 38, I think this  
 24 would have been better worded had Mr Radley outlined and  
 25 said, "Based on your report", you know, our preliminary

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14:44 1 report, "what do you mean by this?" But R-28 falls into  
 2 all of the other documents.  
 3 Q. Is this not a good example of cognitive bias?  
 4 A. (Mr LaPorte) No, this is not cognitive bias at all.  
 5 What we're saying is: we have to accept -- we have to  
 6 use a date for what it's being purported as. That's the  
 7 date that we're working with. That's the only date that  
 8 we have on the document.  
 9 Q. Why did you use the phrase "disputed signatures"  
 10 throughout your report?  
 11 A. (Mr Welch) Because they're coming to us as being  
 12 documents that are in dispute, they're questionable.  
 13 Are they questionable, are they genuine or are they  
 14 fraudulently produced? They're disputed somehow.  
 15 Q. No, the documents are disputed, and in the terms of  
 16 reference there is a reference to "Disputed Documents".  
 17 But there is nowhere -- you can take it from me -- in  
 18 the terms of reference any reference to "disputed  
 19 signatures", yet you use that phrase throughout your  
 20 report.  
 21 A. (Mr Welch) Yes, because their genuineness, or whether or  
 22 not they're genuine, or whether or not they're  
 23 fraudulently produced, is not determined. Because  
 24 I state that doesn't mean that we're one side or the  
 25 other. We are neutral, as my partner has said. We're

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14:45 1 neutral experts. We start there. So --  
 2 Q. So because you state that they're disputed, we shouldn't  
 3 understand that they're disputed?  
 4 A. (Mr LaPorte) Well, we were not instructed in any way  
 5 that certain signatures were genuine or not disputed.  
 6 Nobody told us that.  
 7 Q. So why do you just not refer to them as "the signatures  
 8 on the Disputed Documents"?  
 9 A. (Mr LaPorte) That sounds like a semantic statement.  
 10 I mean, they're still -- if you're asking us, if you're  
 11 making a request for us to do an examination of those  
 12 signatures, then they're disputed.  
 13 And the irony is we don't know, we have no idea  
 14 whose signature belongs to who on what side. So we did  
 15 a full examination of all of the signatures. I believe  
 16 some of those signatures may have belonged to the  
 17 Respondent in some way; I don't know that. I still  
 18 don't know all of those signatures and who those people  
 19 are associated with. We had no idea. I mean, certainly  
 20 there's some signatures that the person has "BSGR" under  
 21 them, so I assume they're with BSGR. But that doesn't  
 22 matter to us.  
 23 Q. Just turning to another assumption that I think you've  
 24 made in the report, and this relates to the serial  
 25 numbers on stamps. You mentioned this when you were

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14:46 1 explaining how you approached the stamps.  
 2 Am I right in saying that in relation to K20 --  
 3 A. (Mr Welch) Can you give us a page number?  
 4 Q. Sorry, I'm going to tab 1, page 49 in your report.  
 5 (Pause to locate the document)  
 6 This deals with K20 and the serial numbers beginning  
 7 "BB0667".  
 8 A. (Mr LaPorte) Yes.  
 9 Q. You say that:  
 10 "Since the 'BB' prefix on K20 is expected to follow  
 11 the 'BA' prefix, which was used for the Adhesive Stamps  
 12 on R-24, then the sequencing of the Adhesive Stamps on  
 13 R-24 is consistent with them being applied before  
 14 December 2009."  
 15 A. (Mr LaPorte) Actually, maybe "being applied" would have  
 16 been -- the "applied" word probably shouldn't have been  
 17 used. We should have said "manufactured".  
 18 Q. Okay. The --  
 19 A. (Mr LaPorte) Because I can't -- for all fairness, just  
 20 to make sure that everybody understands, so we can't  
 21 tell you exactly when the stamps were applied, nor would  
 22 we make that kind of assertion. So that was a poor  
 23 word, and we should have used just "manufactured  
 24 before".  
 25 Q. But why does the same logic not apply to the serial

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14:48 1 number sequencing that are applied to R-24, R-25 and  
 2 R-26?  
 3 A. (Mr LaPorte) I'm sorry, what do you mean?  
 4 Q. Go to tab 1, page 98 of your report, paragraph 145.  
 5 That's the opposite logic, isn't it, from the logic that  
 6 you apply to the previous document, to the K20 document?  
 7 A. (Mr LaPorte) No, once again, we should have used the  
 8 term "manufactured". But the sequence -- what we're  
 9 saying in here is that, yes, the sequential numbers are  
 10 up; but as we explained above, we don't know how those  
 11 stamps were purchased, whether you could go to the --  
 12 whether the timbre fiscal stamps, you go to the store  
 13 and you could purchase them, and they would already have  
 14 completely different serial numbers based on what the  
 15 store has or where you purchase them from.  
 16 So all we're saying is we can't make any assertions  
 17 based on the sequences being up.  
 18 Q. But you do make an assertion in relation to K20, but you  
 19 say you can't make an assertion in relation to the other  
 20 documents. The K20 assertion is that it's consistent  
 21 with them being applied before 16th December 2009.  
 22 A. (Mr LaPorte) Yes. Once again, it should have been  
 23 "manufactured before".  
 24 Q. Okay. It's a big difference, isn't it?  
 25 A. (Mr LaPorte) Yes, I apologise, it was a poor choice of

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14:50 1 words. It should have been "manufactured", not  
 2 "applied". "Applied" means it was stuck to. And no, we  
 3 can't make a conclusion about when the stamp was stuck  
 4 on the document.  
 5 Q. Okay. It makes the stamp evidence slightly confusing,  
 6 if actually the evidence that you've given in relation  
 7 to stamps is all about its application, but actually you  
 8 meant to say "manufactured".  
 9 A. (Mr LaPorte) It was manufactured. Actually, it doesn't  
 10 change any of our conclusions. There's no evidence to  
 11 suggest that the stamps were manufactured after the date  
 12 of the document and then reapplied. That's all we're  
 13 saying. That doesn't affect our conclusion in any way  
 14 whatsoever. But yes, I do agree that it should have  
 15 been "manufactured", not "adhered to" or "stuck to".  
 16 Q. I'm going to move on to the debate about the alternative  
 17 considerations, which we've touched upon already this  
 18 morning.  
 19 In layman's language -- and I'm using a phrase that  
 20 Mr Radley uses in his report -- the alternative  
 21 propositions is about:  
 22 "... considering all issues on 'both sides of the  
 23 coin' [and then] assessing the likelihood of one  
 24 proposition over another."  
 25 Is that right?

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14:51 1 A. (Mr LaPorte) Yes, that's what he says.  
 2 Q. Sorry, do you agree with that?  
 3 A. (Mr LaPorte) Absolutely not.  
 4 Q. Why?  
 5 A. (Mr LaPorte) Because you can't assess the likelihood of  
 6 certain situations without doing that based on having  
 7 statistics. So I agree in concept with what Mr Radley  
 8 says, but I don't agree with the use of "likelihood".  
 9 First of all, "likelihood" is a statistical term  
 10 that implies that you have some sort of numerical and  
 11 quantitative value. So for somebody to say you can  
 12 assess the likelihood that something was printed on  
 13 a toner machine versus an inkjet machine, I would say:  
 14 how do you assess that likelihood? There's no  
 15 likelihood of that. We don't have any research to back  
 16 that up.  
 17 Q. Your entire conclusions -- and this is non-signature;  
 18 I'm not dealing with the signatures at the moment.  
 19 A. (Mr LaPorte) Correct.  
 20 Q. But your entire conclusions are based on one side of the  
 21 coin, as I put it, i.e. that there's no evidence of page  
 22 substitution, text alteration, text addition or other  
 23 irregularities, and then the documents are not  
 24 fraudulent; is that correct?  
 25 A. (Mr LaPorte) First of all, I never said that -- we said

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14:52 1 there is no evidence to indicate that the documents are  
 2 fraudulent. As I explained this morning, we didn't make  
 3 a conclusion that they're genuine. Based on all of the  
 4 evidence that we looked at, there's no evidence to  
 5 indicate that they're fraudulent.  
 6 Q. But did you consider the alternative propositions?  
 7 A. (Mr LaPorte) Absolutely. We always consider the  
 8 alternative propositions.  
 9 Q. So why in the report is there no consideration of the  
 10 alternative propositions?  
 11 A. (Mr LaPorte) This report would have been 5,000 pages --  
 12 and I'm not exaggerating -- if every one of our thoughts  
 13 went into all of this verbiage. What we've outlined at  
 14 the beginning, which we haven't covered, is we do  
 15 describe the testing that we do and the possible  
 16 outcomes of them.  
 17 Q. I understand that, and I understand that you may not  
 18 want to set out all of the alternative propositions.  
 19 But there's not a single alternative proposition put in  
 20 the report.  
 21 A. (Mr LaPorte) There's always an alternative proposition.  
 22 Q. Can you point me to the alternative propositions?  
 23 A. (Mr LaPorte) Such as, for example, we pointed out the  
 24 alternative propositions for -- there's an alternative  
 25 proposition for everything. So when we talk about

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14:53 1 indentation examinations, and I talked this morning  
 2 about having an earlier-dated document on a later-dated  
 3 document, the other proposition is that someone truly  
 4 did backdate a document, but they didn't do it on top of  
 5 another piece of paper, so there are no impressions.  
 6 That's the alternative.  
 7 Q. But there is an alternative --  
 8 A. (Mr LaPorte) There's an alternative proposition to  
 9 everything.  
 10 Q. Yes.  
 11 A. (Mr LaPorte) To everything.  
 12 Q. But none of the alternative propositions are identified  
 13 in your report?  
 14 A. (Mr LaPorte) No. We discussed -- we stated about  
 15 indentation examinations. We said: when we can find  
 16 an earlier-dated document found on a later-dated  
 17 document, we can make a conclusion that it was not  
 18 executed on its purported date, if we find that  
 19 evidence.  
 20 Q. So one alternative proposition is that there is no  
 21 alternative authenticity; that's correct?  
 22 A. (Mr LaPorte) As we talked before -- once again, can I go  
 23 back to my slides at this point in time?  
 24 THE PRESIDENT: Yes, you always can if it helps you respond  
 25 to a question.

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14:54 1 A. (Mr LaPorte) Okay. (Pause)  
 2 First of all, this is slide 7. So this is from  
 3 a recognised authority in the area of forensic document  
 4 examination, Ordway Hilton. This is an article. But  
 5 what Hilton describes in here, which we agree with, is  
 6 that genuineness is really about something that hasn't  
 7 been altered. It's only proven by showing that there  
 8 has been no alteration, or, more specifically, that no  
 9 fraudulent act has been committed. So that's what  
 10 Ordway Hilton says.  
 11 (Slide 8) And then there's another book that's been  
 12 written as well, by Jan Seaman Kelly and Brian Lindblom.  
 13 So this is Kelly and Lindblom. They talk about this  
 14 exact concept in here:  
 15 "Proving that a paper is unaltered is a challenging  
 16 problem."  
 17 We've admitted to that. And by "paper" they mean  
 18 a questioned document. And as they say here:  
 19 "It is the cumulative evidence that establishes that  
 20 the document is unaltered."  
 21 (Slide 9) They go on to say, if we look right at the  
 22 underlying portion:  
 23 "When the combined results reveal no change, it can  
 24 be stated that there is no evidence to support that this  
 25 document was altered."

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14:56 1 Which is the language that we used, which is the  
 2 language that's been used by hundreds of examiners over  
 3 the years, and I see it actually quite often.  
 4 So this is written in textbooks about what this  
 5 means, and it goes all to the fact that proving  
 6 a document is genuine is -- I don't want to say  
 7 "impossible", but I'll say is nearly impossible.  
 8 MR LIBSON: But this isn't the language that you use.  
 9 A. (Mr LaPorte) We said that there's no evidence to support  
 10 that the document was fraudulent. "Altered" would mean  
 11 that it was fraudulent.  
 12 MR OSTROVE: For the record, we have added slides 8 and 9,  
 13 I think.  
 14 MR LIBSON: "Fraudulent" does not mean "altered".  
 15 A document can be altered for legitimate purposes  
 16 presumably?  
 17 A. (Mr LaPorte) It can, yes.  
 18 Q. Exactly, so it's not the same.  
 19 A. (Mr LaPorte) Yes.  
 20 Q. You just said "fraudulent" meant "altered".  
 21 A. (Mr LaPorte) Altered for fraudulent purposes.  
 22 Q. Okay. So the issue of considering alternative  
 23 propositions is something that is important in guarding  
 24 against cognitive bias, isn't it?  
 25 A. (Mr LaPorte) I wouldn't say that it guards -- cognitive

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14:58 1 bias is when somebody gives you information that they  
 2 shouldn't be giving you.  
 3 Q. Can we refer to the same document that you referred us  
 4 to, the Forensic Science Regulator report. I don't know  
 5 which tab that's in. It was sent last night. (Pause to  
 6 locate the document)  
 7 THE PRESIDENT: We should describe this for the record, for  
 8 the transcript.  
 9 MR LIBSON: It's the guidance from the Forensic Science  
 10 Regulator, "Cognitive Bias Effects". It was just  
 11 referred to earlier, on a previous slide (28).  
 12 I am looking at page 24 of 96, paragraph 5.3.  
 13 (Pause to locate the document)  
 14 A. (Mr LaPorte) Can you read it into the record?  
 15 Q. It says at paragraph 5.3, in the subheading, "The role  
 16 of a forensic expert". And the paragraph reads:  
 17 "The role of the forensic science expert is to  
 18 evaluate scientific findings and the results of  
 19 analytical tests in the context of the relevant case  
 20 circumstances. An expert opinion should meet the  
 21 following criteria -- that it is balanced, robust,  
 22 logical and transparent."  
 23 Do you agree with that?  
 24 A. (Mr LaPorte) I totally agree with that, and I think  
 25 that's exactly what we did.

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14:59 1 Q. And then it breaks down the four criteria: "Balanced",  
 2 "Robust", "Logical", "Transparent".  
 3 THE PRESIDENT: I'm sorry, but the Tribunal is a little lost  
 4 here. Can we just make sure that we look at the right  
 5 document. It is also for the transcript later on.  
 6 MR OSTROVE: We also don't have that page. We only have  
 7 through page 23.  
 8 MR GAREL: The pages we printed were only the pages that  
 9 Mr LaPorte was going to refer to in his presentation,  
 10 when we still thought he was going to do a presentation.  
 11 So I didn't print the entire report, just for ecological  
 12 purposes. I sent the full report by email, and  
 13 I printed the relevant pages in paper.  
 14 So you have it. In the Box folder of the case, we  
 15 have the full report. I only printed the relevant --  
 16 THE PRESIDENT: When you speak of "the full report" --  
 17 MR GAREL: The full document, sorry.  
 18 THE PRESIDENT: The document entitled "Cognitive Bias  
 19 Effects" of the Forensic Science Regulator, it says  
 20 "Overseeing Quality". And we have all the pages that  
 21 were submitted last night, but we don't have the  
 22 relevant pages now. That's not a problem, as long as we  
 23 are clear what we are talking about and that it is in  
 24 the record.  
 25 So would you mind repeating the question and the

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15:01 1 passage that you were referring to, with the page,  
2 please.  
3 MR LIBSON: It's page 24 of 96, it's paragraph 5.3, and it  
4 has the subheading "The Role of a Forensic Expert". It  
5 reads:  
6 "The role of the forensic science expert is to  
7 evaluate scientific findings and the results of  
8 analytical tests in the context of the relevant case  
9 circumstances. An expert opinion should meet the  
10 following criteria -- that it is balanced, robust,  
11 logical and transparent."  
12 And I think Mr LaPorte agreed, wholeheartedly  
13 I would even say, with that.  
14 A. (Mr LaPorte) That's correct, yes.  
15 Q. Then later in the paragraph, immediately below that, it  
16 goes through those four criteria: "Balanced", "Robust",  
17 "Logical" and "Transparent". At (a) in relation to  
18 "Balanced", it says:  
19 "... the expert has considered alternative  
20 propositions. At the simplest level it may be match or  
21 no match, but in other cases it may require both the  
22 prosecution and defence propositions are constructed  
23 and/or considered in the evaluation."  
24 Do you agree with that?  
25 A. (Mr LaPorte) Absolutely.

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15:02 1 Q. So wouldn't it have helped us to see your consideration  
2 of alternative propositions in your report?  
3 A. (Mr LaPorte) Like I said, I think we explained this in  
4 the early part of our report. When we talk about --  
5 like when we do an ESDA indentation examination, we  
6 talked about what the findings could indicate. We  
7 talked about the stamps this morning, like I talked  
8 about, and I said: okay -- and we say this in our  
9 report -- if there are physical characteristics and  
10 there's some consistency with somebody stamping  
11 a document -- two documents that have been dated in  
12 an entirely different time period but they've been  
13 stamped contemporaneously, we would issue those kinds of  
14 findings. We did not find those. So I can't just make  
15 up things because we don't have any findings. The  
16 findings are the findings.  
17 Q. We did ask lots of questions about alternative  
18 propositions and you just didn't want to deal with them.  
19 A. (Mr LaPorte) No, because they're -- first of all,  
20 alternative propositions, we do that all the time.  
21 I mean, we're always looking for explanations, whatever  
22 that may be.  
23 Q. I thought you said this morning you wouldn't do it  
24 because it was speculation?  
25 A. (Mr LaPorte) No, I said some alternative -- first of

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15:03 1 all, there can be speculation. I never said that --  
2 I believe my response was: yes, we always consider  
3 alternative propositions.  
4 Q. Can I just -- we're going to come back to it a few  
5 times, but can I take you to tab 45, and I'll take you  
6 to the specific page in a minute. I just want to put  
7 a proposition to you.  
8 The disputed documents in this case are very short  
9 documents, aren't they? Yes? The disputed documents  
10 that you looked at.  
11 A. (Mr LaPorte) It was only one document, I believe.  
12 Q. No, sorry, not in Patel, sorry. I'm talking about our  
13 case, sorry.  
14 A. (Mr LaPorte) Oh.  
15 Q. Sorry, I'll come to Patel in a second. Sorry, it's my  
16 mistake; I shouldn't have taken you to it.  
17 A. (Mr LaPorte) So what page am I looking at?  
18 Q. No, this is just a general question. The documents in  
19 our case, in the case in question --  
20 A. (Mr LaPorte) Yes.  
21 Q. -- that we're here for, they're short documents?  
22 A. (Mr LaPorte) I don't know if I'd call them "short".  
23 I mean, they're multiple-page documents.  
24 Q. They're one or two pages, one- or two-page documents?  
25 A. (Mr LaPorte) Relative, I guess. "Short" is a relative

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15:04 1 word.  
2 Q. Okay. Mr Radley in his report refers to the proposition  
3 that it's equally likely that a fraudster would reprint  
4 a document if an error was made as would occur for  
5 a genuine document, and he calls that an "equally likely  
6 proposition". Do you accept that?  
7 A. (Mr LaPorte) I totally disagree with that. How would he  
8 know that it's equally likely that a fraudster would  
9 reprint something with an error? How do we know that  
10 the fraudster observed their own error? I've seen many  
11 documents before, fraudulent documents, where an error  
12 is committed because somebody misses the error.  
13 So once again, this is a likelihood thing. There's  
14 no statistics, there's no research and there's no --  
15 there's nothing to back up a statement like that.  
16 Certainly that's a proposition for us to think about,  
17 I understand that. But now to sort of weigh that out on  
18 a scale and balance it, without having some sort of  
19 numerical value? I don't know how I would do that.  
20 Q. Have you still got the Patel transcript open there?  
21 A. Yes.  
22 Q. Can you go to pages 157 and 158 in there.  
23 A. (Mr LaPorte) Yes.  
24 Q. If you go to line 24 on page 157 to line 9 on page 158.  
25 This is you being asked questions.

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15:06 1 A. (Mr LaPorte) Okay.  
 2 Q. So could you perhaps, because it was your voice, just  
 3 read this out.  
 4 A. (Mr LaPorte) I'm sorry, what line starting?  
 5 Q. Line 24:  
 6 "Also, too, in my experience ..."  
 7 A. (Mr LaPorte) Okay. Well, can I read the whole answer,  
 8 so I have context?  
 9 Q. Of course.  
 10 A. (Mr LaPorte) Okay:  
 11 "It is not an alteration of the text, the wording in  
 12 the document. I think I was clear in my report that  
 13 I agree that the document was cut down. Also, too, in  
 14 my experience, when people do things fraudulently with  
 15 a document, they become very careful with the document.  
 16 They don't do things to it like cut it down, because  
 17 then it becomes too detectable."  
 18 Q. Yes, carry on.  
 19 A. (Mr LaPorte) "Most people, when they do things that are  
 20 fraudulent with a document, they actually become  
 21 hypersensitive. They handle it in a real special way.  
 22 It doesn't become bent. It is treated almost with care  
 23 because they know they have created something  
 24 fraudulent. That is just based on my experience."  
 25 Yes, that's a -- and what I was saying was:

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15:07 1 physically, if somebody -- in this particular case, and  
 2 nobody has the context of this, the document was cut,  
 3 somebody cut the top edge of the document. What I'm  
 4 saying is: if it was a fraudulent document, it doesn't  
 5 seem likely that you would create a fraudulent document  
 6 and then you would cut it. I mean, there could be  
 7 a reason for cutting it, yes.  
 8 Q. So that is an alternative proposition?  
 9 A. (Mr LaPorte) Yes, absolutely.  
 10 Q. Okay, thank you.  
 11 A. (Mr LaPorte) And I said that in my report. I mean,  
 12 I agreed that it was cut. But I do go on later on,  
 13 I think I said somewhere in my testimony that we begin  
 14 speculating about why it was cut. Me as a forensic  
 15 document examiner, I can't say why it was particularly  
 16 cut.  
 17 Q. Let's stay in Patel, because "no evidence" was the  
 18 conclusion that you adopted in Patel case as well,  
 19 wasn't it?  
 20 A. (Mr LaPorte) That's correct.  
 21 Q. Okay. So while you're there, if you go to page 186 of  
 22 that same transcript.  
 23 A. (Mr LaPorte) Yes.  
 24 Q. Okay. At line 2 you say:  
 25 "... so the terminology we use in the United States,

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15:08 1 and I don't want to confuse the court, is we can use  
 2 'highly probable' or 'a definitive conclusion', which  
 3 I think would be the same as -- sorry, I don't want to  
 4 mischaracterise what Mr Radley says. But our scale is  
 5 'definitive' [number one], 'highly probable',  
 6 'probable', 'indications' and 'inconclusive' or  
 7 'indeterminate'.  
 8 Yes?  
 9 A. (Mr LaPorte) Yes.  
 10 Q. Why didn't you use that terminology in this case? Not  
 11 in the Patel case, in this case.  
 12 A. (Mr LaPorte) But in the Patel case I used the same  
 13 terminology that I used in this case.  
 14 Q. I know. But why did you not use --  
 15 A. (Mr LaPorte) These are generally for handwriting  
 16 opinions. They can be used and I have used that  
 17 terminology in, I'll say, less complex cases. I use the  
 18 terminology all the time when I do ink dating in some  
 19 respects.  
 20 These cases where the material is just -- there's  
 21 a lot of different tests that are going on, there's  
 22 many, many results to go to, and then there's a whole  
 23 bunch of documents -- in this case we have like thirteen  
 24 documents. In this case there was only one document,  
 25 there was some ink testing that was done, but I still

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15:09 1 didn't use this terminology.  
 2 Q. But if I was to apply "no evidence" and translate it  
 3 into the other terminology, would you agree with me that  
 4 "no evidence" is the same as "indeterminate"?  
 5 A. (Mr LaPorte) I would say that "no evidence to indicate  
 6 fraud", based on this -- so this is where you could  
 7 weigh things out -- but essentially it is indeterminate.  
 8 We're not saying that it's a genuine document; we've  
 9 never said that was a genuine document. What we're  
 10 saying is there's no evidence to support that it's  
 11 a fraudulent document, but the evidence seems to weigh  
 12 in proportion or point towards genuineness.  
 13 Q. Point towards genuineness?  
 14 A. (Mr LaPorte) Point towards.  
 15 Q. But in the Patel case you accepted that "no evidence"  
 16 was the same as indeterminate?  
 17 A. (Mr LaPorte) Yes, I agree that it's indeterminate.  
 18 Q. So how can "indeterminate" mean the same as: point  
 19 towards either one of the outcomes?  
 20 A. (Mr LaPorte) No, this was a single document. I think  
 21 what I outlined this morning was that in combination  
 22 with all of the tests that were done on all of the  
 23 documents, we're talking about 100 mutually exclusive  
 24 tests, none of which showed fraudulence. In the Patel  
 25 case I examined one document and I looked at two

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15:10 1 different things.  
 2 Q. How can a formulation of words such as "no evidence" be  
 3 of any value to anyone, if in one case it means  
 4 something, and in this case you're saying it means  
 5 something else?  
 6 A. (Mr LaPorte) I've never said that it means something  
 7 else. "No evidence" to me means there's no evidence.  
 8 I don't know how else to say it.  
 9 Q. Well, in Patel you accepted -- shall we go to the  
 10 transcript?  
 11 A. (Mr LaPorte) Yes.  
 12 Q. Okay. If you go to page 188.  
 13 MR OSTROVE: (In English) With respect, Madam President,  
 14 I believe the witness has already answered the question  
 15 about the difference between the circumstances of the  
 16 Patel case and this case, and why he could use different  
 17 language. I would also respectfully note that the  
 18 Claimants have already gone beyond the time they had  
 19 indicated. So I would just ask if this line of  
 20 questioning is really relevant to what we're trying to  
 21 accomplish here today.  
 22 THE PRESIDENT: Far beyond? I'm not certain how much  
 23 time --  
 24 MR GAREL: (No microphone)  
 25 THE PRESIDENT: So it's not far beyond.

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15:11 1 MR OSTROVE: I stand corrected.  
 2 THE PRESIDENT: Yes.  
 3 MR LIBSON: So can I go to the end of the -- sorry.  
 4 THE PRESIDENT: No, just about the time. How much more time  
 5 do you think you will need?  
 6 MR LIBSON: I have to deal with handwriting as well. I will  
 7 finish with Patel and then I'll go on to handwriting.  
 8 THE PRESIDENT: I can understand that, but that doesn't  
 9 really answer my question.  
 10 MR LIBSON: I will be shorter on handwriting. I will be,  
 11 hopefully, 15 minutes on handwriting, and 5 for Mr Daele  
 12 at the end. So 20 more minutes, if we may.  
 13 THE PRESIDENT: 20 more minutes, yes, I think we can allow  
 14 that. We will give you more time if you need it.  
 15 Somehow tomorrow night we are all leaving here,  
 16 right, and we will have to have our work completed. We  
 17 are all in this, so we all need to cooperate so that we  
 18 get this done. And I'm grateful to the experts also for  
 19 their patience.  
 20 Maybe I shouldn't waste time speaking too much.  
 21 MR LIBSON: Okay.  
 22 So I'm at line 25, which is the end of page 187, and  
 23 it's a question:  
 24 "Do you not agree that someone reading your  
 25 conclusion, the way you have phrased it, might infer

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15:13 1 from your negative that there was not evidence that the  
 2 signatures were written in the past two years, that  
 3 there was evidence that the signatures were written in  
 4 the past two years?"  
 5 And you answer:  
 6 "No, I mean, I apologise if there was confusion,  
 7 because I generally like to make sure that this is very  
 8 well understood in my report. So my conclusion is that  
 9 I'm indeterminate. I can't make a decision one way or  
 10 another."  
 11 And "indeterminate" is taken from the phraseology --  
 12 A. (Mr LaPorte) Correct. And if you look at line 19 on  
 13 page 188, ultimately what I said is:  
 14 "I cannot conclude when the 2005 will was printed  
 15 and signed."  
 16 And I would say the very same thing in this  
 17 particular case: I cannot conclude when the documents  
 18 were printed and signed for sure, with that definitive  
 19 opinion.  
 20 Q. Okay.  
 21 A. (Mr LaPorte) But this is a completely different document  
 22 examination. I didn't do a full document examination,  
 23 and there were no handwritten -- I didn't do any  
 24 handwriting in this particular case. It was a one-page  
 25 document.

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15:14 1 Q. I just want to ask you one last question on phraseology.  
 2 The phraseology "it is [my] expert opinion that there is  
 3 every indication that the Disputed Documents are  
 4 genuine", is that meaningful to you, in terms of the  
 5 phrases that either your bodies recommend or that you  
 6 use in your evidence?  
 7 A. (Mr LaPorte) I'm sorry, repeat that?  
 8 Q. "... it is [my] expert opinion that there is every  
 9 indication that the Disputed Documents are genuine".  
 10 And the phrase I am particularly interested in is "every  
 11 indication", because I've seen the word "indications"  
 12 used in the SWGDOC terminology, but I haven't seen --  
 13 and I'm obviously an amateur compared to you -- but  
 14 I haven't seen anywhere in the literature the phrase  
 15 "every indication that" as a helpful phrase.  
 16 A. (Mr LaPorte) Where was that statement from?  
 17 Q. The statement is in the comments of the Republic of  
 18 Guinea on the final report of the Tribunal-appointed  
 19 experts. It's at tab 29.  
 20 A. (Mr LaPorte) We didn't even know that you were referring  
 21 to that. (Pause to locate the document)  
 22 Q. Paragraph 6 at tab 29, page 2 of the report, just that  
 23 first sentence at the top of the page.  
 24 A. (Mr LaPorte) My response would be: I didn't make this  
 25 statement.

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15:16 1 Q. No, I'm not suggesting you did. I'm asking you: do you  
 2 find that a helpful phrase, "every indication"? Can you  
 3 point to anywhere in the literature where it comes from?  
 4 Paragraph 6 at the top of page 2.  
 5 A. (Mr LaPorte) I don't have a comment about that. I mean,  
 6 that's not a statement that I use. I think that's --  
 7 Q. Have you seen it made anywhere else?  
 8 A. (Mr LaPorte) Gosh, I've seen a lot of cases. I don't  
 9 know if I have or I have not seen that.  
 10 THE PRESIDENT: In the Patel transcript, 186, in the  
 11 terminology that you referred to there is one that says  
 12 "indications". Is that what you meant there, or do you  
 13 mean something else?  
 14 A. (Mr LaPorte) So "indications" -- and this can be  
 15 confusing. So the term "indications", as defined in the  
 16 SWGDOC standard, has a specific meaning. So Mr Welch  
 17 can explain that a little more clearly, but that has  
 18 a specific definition. So it depends on how the  
 19 terminology is used in the report.  
 20 So there are things when you're going through  
 21 a report that you can use the word "indicate", which  
 22 means there's indicia of. But when you use the term  
 23 "indications", if somebody is using that terminology,  
 24 they should probably footnote the definition of it.  
 25 I mean, that's what I've done in the past.

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15:17 1 PROFESSOR VAN DEN BERG: In the scale, "indication" is  
 2 between "probable" and "inconclusive".  
 3 A. (Mr LaPorte) In the scale, yes, correct.  
 4 MR LIBSON: Thank you. I just want to have one last  
 5 question before I get to the signatures. I want to look  
 6 at one example of where a variety of different factors  
 7 are identified in your report on a document that you  
 8 don't seem to have weighed in the balance in your  
 9 conclusion.  
 10 So I would like to go to R-26, your general  
 11 conclusions on R-26, tab 1, page 75. I want to put to  
 12 you the general propositions in relation to this  
 13 document that you have identified. They are not all in  
 14 one place in the document, but you'll disagree with me  
 15 if I get it wrong.  
 16 So in your report in relation to R-26 you note five  
 17 separate things: (1) that the impressions of the later  
 18 document, R-29, were found on R-26; (2) that you can't  
 19 reach a conclusive opinion on whether the initials  
 20 "A.L." are those of Mr Lev Ran; (3) that in reaching  
 21 a determination, you disregarded a set of apparently  
 22 rogue comparator initials; (4) that the ink or toner was  
 23 found on the front of page 1 and the back of pages 3 and  
 24 4, but you could not determine the source of that  
 25 transfer, that's paragraph 138 of your report; and (5)

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15:19 1 that different font sizes are used for page 1 of R-26  
 2 compared with pages 2 and 4.  
 3 Do all of those comments ring a bell to you?  
 4 A. (Mr LaPorte) Yes.  
 5 A. (Mr Welch) Yes.  
 6 Q. They do. And then you conclude:  
 7 "There is no evidence of page substitution, text  
 8 alteration, text addition or other irregularities to  
 9 indicate that R26 was fraudulently produced."  
 10 Correct?  
 11 A. (Mr LaPorte) Correct.  
 12 A. (Mr Welch) Correct.  
 13 Q. So none of those five factors were considered in the  
 14 totality of the evidence?  
 15 A. (Mr LaPorte) Of course they were considered.  
 16 A. (Mr Welch) They were considered.  
 17 A. (Mr LaPorte) Because somebody uses a different size font  
 18 in their document, that doesn't mean it's been altered.  
 19 That almost seems like common sense; I'm sure we've all  
 20 used different fonts in our documents.  
 21 Q. So the cumulative effect of five different factors did  
 22 not give rise to any comment in relation to the overall  
 23 assessment? Because there's no argument in relation to  
 24 this; there's just identification of those five factors  
 25 in the report, but nothing where you set out why they

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15:20 1 don't give rise to any other conclusions.  
 2 A. (Mr LaPorte) No, many of those are actually very simply  
 3 and logically explained. If we made a conclusion that  
 4 that document was fraudulent based on that, we would get  
 5 kicked out of our professional organisations, if we ever  
 6 made a statement that a document was fraudulent based on  
 7 that.  
 8 Q. No, I'm not suggesting that you ought to have made that  
 9 conclusion. I'm wondering why there was an utter  
 10 rejection of any other -- and just in relation to this  
 11 document, because we could go through many of the  
 12 documents and apply this formula, but there was  
 13 a rejection of any other irregularities as something to  
 14 note in relation to the final conclusion.  
 15 A. (Mr Welch) What irregularities were rejected?  
 16 Q. The five that I have mentioned.  
 17 A. (Mr Welch) So I can address the rogue initials, if  
 18 I could bring up a document. (Pause to locate the  
 19 document)  
 20 The reason why these particular initials were  
 21 rejected were for two reasons. Essentially, the  
 22 first -- this is page 1 -- page 1 has two sets of "A.L."  
 23 initials in black ink. Page 2 has one set of initials,  
 24 "A.L."  
 25 The reason why it was rejected: if you look at the

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15:23 1 signature, it's a blue ballpoint pen ink. If you look  
 2 at the initials for that page, "A.L." allegedly  
 3 representing "Avraham Lev Ran". So it's suggested or  
 4 indicated that these were initialled at different times.  
 5 Secondly, there was an entry that you could see, and  
 6 if you adjusted the contrast you could see this entry  
 7 right above the first "A.L." initial on page 1 of R-26,  
 8 where there's an "X" marked, and it appears to say  
 9 "Michael" or "Michel", or possibly "M-I-C-H-A-L".  
 10 THE PRESIDENT: I would read "initial".  
 11 A. (Mr Welch) Okay, "initial", alright.  
 12 THE PRESIDENT: That would make sense, because --  
 13 A. (Mr Welch) "Initial", okay. Sorry.  
 14 So that's essentially -- as soon as I saw (1) that  
 15 the ink was a different colour, and (2) that the  
 16 characteristics in those initials, they appeared to be  
 17 distorted, I didn't know and feel it appropriate to use  
 18 these as known initial standards of Mr Avraham Lev Ran.  
 19 MR DAELE: That's not my point. My point is that these look  
 20 to me, as a layman, irregularities on the document, yet  
 21 they were completely discounted in your conclusions in  
 22 relation to this document. This is one of five things  
 23 that we say are irregularities that you've identified  
 24 that say that there are no irregularities.  
 25 My point is not about the different times of the

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15:25 1 affixing of the signatures or the different inks; it's  
 2 about the irregularities, which is what you say about  
 3 this document.  
 4 A. (Mr LaPorte) No other irregularities to indicate fraud.  
 5 That's what that statement is: no irregularities to  
 6 indicate fraud. And a change in a font, and then having  
 7 an ink toner transfer that we could not source, that  
 8 doesn't constitute fraud.  
 9 Q. I'm going to now, as I said, move on to the handwriting.  
 10 MR OSTROVE: I'm sorry, just for the record, the documents  
 11 that were just put up on the screen, were those  
 12 additional slides from the PowerPoints?  
 13 A. (Mr LaPorte) Correct.  
 14 MR OSTROVE: Would it be possible for us to get  
 15 an indication of which slides were referred to, maybe at  
 16 the break?  
 17 THE PRESIDENT: It would be helpful, yes.  
 18 A. (Mr LaPorte) Do you want the number now for the record?  
 19 A. (Mr Welch) Yes, okay.  
 20 THE PRESIDENT: The document was C-0084.6 that you showed to  
 21 us?  
 22 A. (Mr Welch) C-0084.7. I'm sorry, .6 and .7.  
 23 THE PRESIDENT: Thank you.  
 24 A. (Mr Welch) The slide numbers were 65 and 66.  
 25 THE PRESIDENT: So these were taken from your slides 64 ...

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15:27 1 A. (Mr Welch) 65 and 66.  
 2 THE PRESIDENT: Good, thank you.  
 3 A. (Mr Welch) 65 represented C-0084.6 and 66 represented  
 4 .7.  
 5 THE PRESIDENT: Thank you.  
 6 A. (Mr Welch) You're welcome.  
 7 THE PRESIDENT: Mr Libson, you can continue.  
 8 MR LIBSON: Thank you. So I'm turning now to the  
 9 signatures.  
 10 So in relation to the documents, if we accept the  
 11 proposition that it is difficult to conclude, that  
 12 they're indeterminate one way or another in relation to  
 13 the genuineness or there are no indications of them  
 14 being fraudulent, then the issue of whether the  
 15 signatures are forged or not becomes the determinative  
 16 factor, and the stamps as well. We've dealt with the  
 17 stamps, but I'm now turning to the signatures. That's  
 18 correct as a proposition, isn't it?  
 19 A. (Mr Welch) Well, you can have an authentic signature,  
 20 a genuine signature on a document that's fraudulent.  
 21 Q. Yes, of course. Of course.  
 22 We've discussed the SWGDOC guidelines. You've said  
 23 that the SWGDOC guidelines Mr LaPorte hasn't applied to  
 24 his analysis but, Mr Welch, you've applied them to your  
 25 analysis, haven't you?

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15:28 1 A. (Mr Welch) Correct.  
 2 Q. They're at paragraph 38 of your report. The actual  
 3 standard is at tab 19, Annex C. It's paragraph 7.12.5.  
 4 A. (Mr Welch) I'm sorry, one second. (Pause) Okay. I'm  
 5 sorry, what section?  
 6 Q. Paragraph 7.12.5 of the Standard for Examination of  
 7 Handwritten Items. It's page 3, the bottom of page 3 in  
 8 tab 19.  
 9 A. (Mr Welch) Okay.  
 10 Q. You've got it?  
 11 A. (Mr Welch) Yes.  
 12 Q. It says that an examiner must:  
 13 "Evaluate the similarities, differences, and  
 14 limitations."  
 15 And:  
 16 "Determine their significance individually and in  
 17 combination."  
 18 A. (Mr Welch) That's correct.  
 19 Q. But you haven't -- sorry, and in your final report you  
 20 also state in relation to handwriting that:  
 21 "Writing is identifiable when there is agreement in  
 22 the combination of individual and class characteristics,  
 23 while lacking any fundamental differences."  
 24 That's --  
 25 A. (Mr Welch) Correct.

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15:30 1 Q. So when we look at handwriting, differences are as  
2 important as similarities; is that right?  
3 A. (Mr Welch) Correct.  
4 Q. But you don't identify a single difference in the  
5 handwriting between the disputed documents and those of  
6 the comparator documents in your report, do you?  
7 A. (Mr Welch) No, that's correct.  
8 Q. So why, when you are talking generally about  
9 handwriting, do you refer to the need to identify  
10 differences, but when looking at the specific documents,  
11 you don't?  
12 A. (Mr Welch) Because I didn't see any differences of  
13 significance in the comparison evaluation.  
14 Q. Did you see differences?  
15 A. (Mr Welch) No, I did not see any fundamental  
16 differences.  
17 Q. Okay. We asked you to identify differences in our  
18 comments to the preliminary report, and that's at  
19 paragraph 19 of our comments, which is Annex L, which is  
20 tab 21. If you go to page 17.  
21 A. (Mr Welch) I'm there.  
22 Q. Okay. Question 21:  
23 "Do the Experts accept that the signatures and/or  
24 initials of Marc Struik, Michael Noy, Avraham Lev Ran,  
25 Abdoulaye Cisse and Mamadie Touré are not difficult to

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15:31 1 copy for someone with good penmanship ability,  
2 i.e. without recourse to tracing and without labouring  
3 of the pen to cause a distortion?"  
4 Do you want to read your answer to that?  
5 A. (Mr Welch) Yes:  
6 "The signatures and initials referenced in this  
7 query were considered and properly evaluated as part of  
8 the forensic examination. Therefore, no changes or  
9 edits will be incorporated into the Final Report based  
10 on this query."  
11 Q. And that's essentially the same answer that you gave to  
12 all our questions, isn't it?  
13 A. (Mr Welch) That's correct.  
14 Q. But it's not really an answer to the question, is it?  
15 A. (Mr Welch) No, it is an answer to the question. If  
16 there were any differences, fundamental differences,  
17 I would not have rendered a positive conclusion and  
18 identification.  
19 Q. It was the same question that Madam President asked you  
20 this morning, wasn't it?  
21 A. (Mr Welch) I'm sorry?  
22 Q. It was the same question that Madam President asked you  
23 this morning, it occurred to her as well, and you gave  
24 a different answer?  
25 A. (Mr Welch) I don't think I did.

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15:32 1 Q. Let's go back to it. In your answer this morning,  
2 Madam President asked you about the differences in  
3 relation to the formation of the "A"s in the Lev Ran  
4 initials, and you said (page 81, line 10):  
5 "... I noted that."  
6 Where?  
7 A. (Mr Welch) It's in the report.  
8 Q. The differences?  
9 A. (Mr Welch) That's correct. There's a red arrow in that  
10 particular chart in that report, and the initial.  
11 Q. There was no clue in the report as to what the red arrow  
12 actually meant. Until this morning, I didn't understand  
13 what the red arrow actually meant.  
14 A. (Mr Welch) Okay, if you go to ... This is the report.  
15 This is going to be page 116. If you look at  
16 figure [38], it says:  
17 "The blue arrows in the chart represent similar  
18 handwriting habits and red arrows represent dissimilar  
19 handwriting habits between the disputed signature and  
20 the known comparison signatures of Avidan Asher."  
21 Q. Okay. I missed that when I read through the report.  
22 But it's not referred in the same rubric for Mr Lev Ran.  
23 In any case, this morning you also said (page 65,  
24 lines 19 to 20):  
25 "Each [signature] has a level of variation ..."

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15:35 1 And you referred to the fact that you looked at  
2 dissimilar characteristics. Where in the report do you  
3 address that?  
4 A. (Mr Welch) I'm sorry?  
5 Q. When you were giving evidence this morning in answer to  
6 a question about the signatures, you said:  
7 "Each [signature] ..."  
8 And I think you mean generally, from the way in  
9 which you introduced, the way in which people form their  
10 signatures:  
11 "... has a level of variation ..."  
12 A. (Mr Welch) Correct.  
13 Q. But we looked at dissimilar characteristics, and my  
14 question to you is: where in the report do you address  
15 the dissimilar characteristics?  
16 A. (Mr Welch) There are -- again --  
17 THE PRESIDENT: To accelerate matters, maybe we could look  
18 at page 83, figure 24. I think that is the one about  
19 which I asked you questions this morning.  
20 A. (Mr Welch) That is correct.  
21 And again, this is an indications opinion. And  
22 according to the SWGDOC standard, I accounted for the  
23 limitations and the limited amount of questioned writing  
24 with respect to the "A.L." initials. And if you read  
25 the standard terminology for "indications":

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15:36 1 "... a body of writing has few features which are of  
2 significance for handwriting comparison purposes, but  
3 those features are in agreement with another body of  
4 writing."  
5 So the signatures that you're talking about, the  
6 signatures of Avraham Lev Ran, Marc Struik and  
7 Avidan Asher I identified. There were no differences,  
8 fundamental differences, and I would have obviously  
9 expressed those if there were, and my conclusion would  
10 have exemplified that, if there were in fact any  
11 fundamental differences.  
12 MR LIBSON: I need to apologise to you, because I put the  
13 question wrongly originally. The red arrows are  
14 indicated in the rubric there as well. So I apologise.  
15 A. (Mr Welch) That's okay.  
16 Q. I'm going to ask one final question on the  
17 [handwriting] --  
18 A. (Mr Welch) Sure.  
19 Q. -- and then pass over to Mr Daele for five minutes.  
20 I want to turn to tab 21 again (Annex L) at page 18.  
21 Sorry, it's in question 25 and it's on page 18.  
22 A. (Mr Welch) Okay.  
23 Q. Part of the criticism that's been made of the questions  
24 that we put to you was that they weren't specific, and  
25 we didn't give the material to you in order for you to

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15:38 1 answer the questions; in other words, the questions that  
2 we raised were too generic.  
3 But here is a very, very specific question where we  
4 put to you the six differences in the known writings of  
5 Mr Lev Ran, and even then -- if you want to read your  
6 response, "Response (a & b)" -- you refused to engage.  
7 Do you want to read that out?  
8 A. (Mr Welch) Sure. You want me to read that response?  
9 Q. Yes.  
10 A. (Mr Welch) "Our findings and conclusions are based on  
11 examining all of the handwriting characteristics and  
12 their appropriate significance in combination.  
13 Therefore, no changes or edits will be incorporated into  
14 the Final Report based on this query."  
15 Yes, if I could address that further.  
16 With respect to that "A" form, it's dissimilar. The  
17 fact that Mr Radley went through and pointed out six  
18 characteristics, I could have gone -- we could have done  
19 the same thing and pointed out the same number of  
20 similar handwriting characteristics with the rest of the  
21 samples, with the periods and with the "L", the height  
22 relations and their proportions. So the fact that  
23 you're mentioning that there are six dissimilarities in  
24 one "A", it's dissimilar, I agree with that. But the  
25 similarities far outweigh the number of dissimilar

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15:39 1 handwriting habits that I've got.  
2 And then in the evaluation in the end, I evaluated  
3 the fact that it's limited in the amount of the writing.  
4 It's two letters: it's a capital "A" and a capital "L".  
5 I considered that in my evaluation. And therefore  
6 that's why it's a very, very, very weak opinion;  
7 indications, according to the standard, and the standard  
8 is very clear on that.  
9 Q. But I don't know why you didn't engage with the  
10 questions when we asked them. It is part of the SWGDOC  
11 recommendations to engage with the differences as well  
12 as the similarities. We asked the question about  
13 differences and you just refused to answer. And that's  
14 the same in relation to practically every single  
15 question in that appendix, both in relation to  
16 handwriting and in relation to other matters.  
17 A. (Mr Welch) Sure, fair enough. But everything that was  
18 asked was considered in the examination process. And  
19 again, another properly trained, competent forensic  
20 document examiner I would expect to come to the same or  
21 similar conclusion, and I fully expected Dr Radley would  
22 render a similar conclusion to me.  
23 Q. Well, he didn't --  
24 A. (Mr Welch) Or that I did.  
25 Q. -- and we're going to hear from him tomorrow.

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15:40 1 A. (Mr Welch) Yes, he didn't, you're correct.  
2 MR LIBSON: Thank you.  
3 MR DAELE: Thank you. I have just three short questions.  
4 In paragraph 11 of the final report you state that:  
5 "... BSGR did not, in good faith, disclose their  
6 reasoning for [applying for] an extension."  
7 Do you remember what reasoning BSGR did disclose?  
8 A. (Mr LaPorte) No, we never received a reason. I don't  
9 believe we did. I'm going to say for accuracy purposes  
10 I don't recall receiving an explanation.  
11 A. (Mr Welch) No, we did not.  
12 A. (Mr LaPorte) It was just BSGR wanted some extra time to  
13 do that. And we said that's -- you know, it's up to the  
14 Tribunal.  
15 Q. But you have seen in the meantime the documents that we  
16 filed with the disqualification request?  
17 A. (Mr LaPorte) I haven't read the explanation thoroughly.  
18 Based on what I've seen, it doesn't seem to make --  
19 Q. Can we go to tab 36. (Pause) Have you seen this  
20 document before?  
21 A. (Mr LaPorte) This tab 36?  
22 Q. Yes.  
23 A. (Mr Welch) It's an email?  
24 Q. Yes.  
25 A. (Mr LaPorte) So I don't recall receiving this email.

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15:42 1 There's a possibility it could have been forwarded and  
 2 then I didn't read the text below it, but I don't recall  
 3 seeing this. I could certainly check --  
 4 Q. Because in the beginning of paragraph 11 you say:  
 5 "We are also concerned that BSGR has not been  
 6 forthright and did not act in good faith with respect to  
 7 their request for an extension to respond to the PR on  
 8 11 January ..."  
 9 So there maybe you got the date wrong, but here --  
 10 A. (Mr Welch) What page? Where are we at?  
 11 Q. Paragraph 11 of your report.  
 12 A. (Mr LaPorte) Yes, this is our report.  
 13 A. (Mr Welch) Yes.  
 14 A. (Mr LaPorte) I recall us saying that.  
 15 Q. So you do recall to have seen it?  
 16 A. (Mr LaPorte) No, I recall we made that statement.  
 17 I don't recall the explanation why. I don't believe we  
 18 received any information or explanation.  
 19 Q. Let's go to tab 36, so the email we've sent, the  
 20 reasoning that we did disclose in support of our request  
 21 for an extension. In the second paragraph you see:  
 22 "However, the PR ..."  
 23 So the preliminary report:  
 24 "... was much longer than anticipated, running to  
 25 almost 200 pages, supported by ..."

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15:43 1 Do you see that?  
 2 A. (Mr LaPorte) Yes.  
 3 Q. So that is the first reason we disclosed. Would you  
 4 consider that a valid reason to ask for an extension?  
 5 A. (Mr LaPorte) When was our PR turned over? When did we  
 6 issue our PR?  
 7 Q. On the 3rd.  
 8 A. (Mr LaPorte) This is January 25th? Why wouldn't you ask  
 9 for that on January 3rd?  
 10 Q. No, that's 10th January.  
 11 A. (Mr LaPorte) Oh, 10th January? Why wouldn't you ask for  
 12 that on January 3rd, when we turned it over?  
 13 Q. But you don't reply to my question. Would you consider  
 14 the fact that your provisional report runs into  
 15 200 pages, and is supported by I think in your report  
 16 you say 10 gigabytes of supporting data, would you  
 17 consider that a valid reason to ask for an extension?  
 18 A. (Mr LaPorte) No, I don't consider that a valid reason.  
 19 We are the ones that wrote the report and put all that  
 20 data together. Todd and I worked til 3 or 4 o'clock in  
 21 the morning a number of times. We worked through  
 22 Christmas, we worked through the holidays. So I think,  
 23 no, I guess that's not acceptable, in my terms.  
 24 Q. Then the second reason we gave in the same paragraph was  
 25 that our experts were caught in a snowstorm. Do you

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15:45 1 remember that snowstorm?  
 2 A. (Mr LaPorte) Yes, it didn't shut down New York. It was  
 3 for two days, and they could have read the report for  
 4 two days.  
 5 A. (Mr Welch) Absolutely.  
 6 Q. Do you consider that a valid reason?  
 7 A. (Mr LaPorte) No, not at all. We were in the snowstorm  
 8 too.  
 9 Q. Yes, but you had done your work. They hadn't done their  
 10 work.  
 11 A. (Mr LaPorte) I was doing work during the snowstorm. You  
 12 use a computer. All you need is a computer and to be  
 13 able to read everything.  
 14 Q. So when the original experts said that they had no  
 15 access because they were working from home and they  
 16 couldn't access the data because of the volume, do you  
 17 think that's not a proper reason?  
 18 A. (Mr LaPorte) Actually, I don't understand that, because  
 19 you don't need to go to your office to receive it  
 20 through Dropbox or -- you know, I don't know if their --  
 21 once again, I don't want to make assumptions. But if  
 22 their power was out, or something like that,  
 23 I understand that, if your power is out for a couple of  
 24 days. And my power was out for 48 hours.  
 25 So I don't -- you know, they can just access the

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15:46 1 files from the internet. All you need is an internet  
 2 connection.  
 3 A. (Mr Welch) The report was a PDF file.  
 4 Q. And what about the supporting data?  
 5 A. (Mr Welch) You can pore over the 200 pages without going  
 6 over there. And then once the storm -- or two days  
 7 later, you could start going over those files.  
 8 Q. But 10 giga of supporting data, how much time would you  
 9 need to go through 10 giga of supporting files? I think  
 10 you say in your report there's like 1,100 electronic  
 11 files of information.  
 12 A. (Mr Welch) Yes.  
 13 Q. How long do you think it takes to go through  
 14 1,100 electronic files?  
 15 A. (Mr LaPorte) I don't know. Mr Radley seemed to get it  
 16 done. I don't quite understand. Mr Radley got it done,  
 17 but Mr Ryan couldn't? That doesn't make any sense.  
 18 Q. I think you did criticise in your report that we did not  
 19 properly review the data, or that the majority of the  
 20 questions would have been unnecessary if we had reviewed  
 21 properly the data. So did we do it or we didn't do it?  
 22 A. (Mr LaPorte) Certainly there was a lot of data in there.  
 23 For example, I think Mr Radley brought up the idea of  
 24 the CPS codes, and he asked us the question. It's like,  
 25 just look at the digital images: you can tell if there's

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15:47 1 a CPS code in a digital image.  
 2 We didn't seem to get those kinds of queries from  
 3 the Respondent's side. They were able to assess the  
 4 evidence. And one of their people lives in New York  
 5 also, and he seemed to get the work done.  
 6 Q. Is it correct that you were, let's say, irritated by the  
 7 fact that you had to work throughout the Christmas  
 8 period, and that BSGR obtained an extension?  
 9 A. (Mr LaPorte) No, it's actually been a pleasure working  
 10 on this case. I can't control the results of the case.  
 11 But no, we enjoyed working on the case, it was a case  
 12 that we'll talk about in the future.  
 13 So, no, we worked hard because somebody gave us  
 14 a deadline, that's why. Nobody likes deadlines. The  
 15 deadline is the deadline.  
 16 Q. You also know that the terms of reference allowed you to  
 17 ask for an extension as well if you needed one?  
 18 A. (Mr LaPorte) Yes, but it was my understanding that --  
 19 Q. But you didn't seem -- that was not necessary?  
 20 A. (Mr LaPorte) No, because we discussed this. We were  
 21 doing a lot of work. You know what? I'm a manager,  
 22 I manage a staff of people, and when I tell people we  
 23 have a deadline, then I expect them to make the  
 24 deadline.  
 25 Q. One last question. In the first line of paragraph 12

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15:48 1 you say:  
 2 "Also, per paragraph 21 and 22 of the [terms of  
 3 reference], both Parties were to provide comment ..."  
 4 And you put that in italic.  
 5 "... however, BSGR instead has provided sixty-five  
 6 (65) queries ..."  
 7 And then in the last [sentence] of the same  
 8 paragraph, you say:  
 9 "Although BSGR's response does not provide comments,  
 10 and instead is designed like a cross examination ..."  
 11 Is it your position then that the comments that BSGR  
 12 made were not in line with paragraphs 21 and 22?  
 13 A. (Mr LaPorte) To me they weren't comments, simply because  
 14 they lacked background. They were just sort of -- when  
 15 you ask a question without providing any kind of  
 16 background, then a layperson could interpret that in  
 17 a different way.  
 18 Q. So they were not in line with 21 and 22?  
 19 A. (Mr LaPorte) At least I didn't see them as being like  
 20 a constructive comment even offering us to make  
 21 a change.  
 22 Q. Did that affect the way you dealt with them?  
 23 A. (Mr LaPorte) No, absolutely not. We had -- we  
 24 certainly -- we read through -- like I said, we have  
 25 respect for Mr Radley, and we read through his comments

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15:50 1 and we considered them. Like I said, Mr Radley is  
 2 a well-respected forensic document examiner, so of  
 3 course we looked at them and we considered everything  
 4 that he said.  
 5 MR DAELE: I have no further questions, thank you. Thank  
 6 you very much.  
 7 THE PRESIDENT: Thank you. So that concludes this part of  
 8 your examination. Now we will take a ten-minute break  
 9 and resume at 4 o'clock, and then we give the floor to  
 10 the Respondent for their questions. You are still under  
 11 the same admonition not to speak, please.  
 12 (3.51 pm)  
 13 (A short break)  
 14 (4.07 pm)  
 15 THE PRESIDENT: Just on the question of the extension for  
 16 the comments on the preliminary report, the Secretary  
 17 has just sent everyone the Secretary's email of  
 18 11th January 2018 to the experts and the response. And  
 19 in case you wish to ask further questions having seen  
 20 the exchange, you may do so, maybe in the follow-up  
 21 questions.  
 22 MR DAELE: Thank you.  
 23 THE PRESIDENT: Good. Let's give the Respondent the floor  
 24 now. Maître Ostrove.  
 25 MR OSTROVE: (Interpreted) Merci, Madame Presidente.

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16:08 1 (In English) For ease of avoiding interpretation, we  
 2 will ask questions of the experts in English, if that's  
 3 alright. (Pause)  
 4 (4.09 pm)  
 5 Examination on behalf of Respondent  
 6 MR OSTROVE: Messrs LaPorte and Welch, good afternoon. My  
 7 name is Michael Ostrove. I'm counsel for the Republic  
 8 of Guinea. I will have a few questions following up on  
 9 various points that have been discussed with you so far,  
 10 and some other questions we have regarding your report  
 11 and certain criticisms of it by Claimants.  
 12 We do not have a bundle of documents. We expect to  
 13 limit ourselves primarily to your final report,  
 14 Mr Radley's report and certain demonstrative exhibits,  
 15 or items that we consider to be demonstrative exhibits,  
 16 and some of the slides that you've provided, and we will  
 17 ask you for your views.  
 18 First, just considering some of the questions that  
 19 Mr Daele asked you regarding the extension for time and  
 20 the change of experts by Claimants.  
 21 When you learned that an extension was being  
 22 granted, did you understand at that time whether  
 23 Claimants were going to be changing experts?  
 24 A. (Mr LaPorte) We did not, no.  
 25 Q. Do you have any knowledge if Mr Ryan and Ms Mancebo

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16:10 1 assisted with the preparation of the comments or  
 2 questions presented by Claimants?  
 3 A. (Mr LaPorte) We do not.  
 4 Q. Do you know whether Claimants are still, to this day,  
 5 relying in any way on Mr Ryan and Ms Mancebo in the  
 6 background?  
 7 A. (Mr LaPorte) We do not.  
 8 Q. To the extent it was your opinion that there may have  
 9 been expert shopping going on, why did you consider that  
 10 important to raise to the Tribunal?  
 11 A. (Mr LaPorte) So I think it was the nature of the  
 12 questions. So I keep coming back to this, the  
 13 65 questions without any context to them. We thought  
 14 that they were questions that when a layperson or -- not  
 15 to say anything demeaning to the Tribunal, but I'll say  
 16 "non-forensic document experts".  
 17 THE PRESIDENT: We are completely aware of our laymen and  
 18 laywoman status, so there's no offence!  
 19 A. (Mr LaPorte) Yes. So if they read the questions too,  
 20 they might get taken aback by the questions, once again  
 21 without having context. So we sort of wanted to lay  
 22 this out in a more transparent way to the Tribunal.  
 23 That really is the ultimate reasoning for what we did.  
 24 We believed that it was our duty to put some context  
 25 into the questions as well too.

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16:12 1 Q. With respect to your analysis of the questioned  
 2 documents, how, if at all, did the change of experts  
 3 affect your approach to your work?  
 4 A. (Mr LaPorte) Oh, in no way whatsoever. I mean, our duty  
 5 is to the Tribunal ultimately, that's who it's to. And  
 6 if other information became available that swayed our  
 7 opinion in some way, then so be it. We are completely  
 8 neutral experts here.  
 9 Once again, when Mr Welch and I examined the  
 10 documents, we didn't even know -- I don't even know who  
 11 the documents -- like why they're even important, for  
 12 that matter. Obviously they're important documents, but  
 13 we don't know why. We don't know, like, the people who  
 14 signed them, who they belong to. I still don't know any  
 15 of the -- I have no context to what any of that means.  
 16 I mean, we just did a forensic document examination.  
 17 And we both -- you know, we have 50 years of  
 18 combined experience. We've been cross-examined, we've  
 19 had really difficult questions. So none of this bothers  
 20 us. It doesn't bother us in any way whatsoever.  
 21 Q. I believe you mentioned on questioning by opposing  
 22 counsel that you had looked at the motion, the request  
 23 to recuse you?  
 24 A. (Mr LaPorte) Yes. Yes, we each read it. I mean, I read  
 25 it once.

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16:13 1 Q. Okay. In retrospect, having looked at the concerns  
 2 raised by BSGR, do you think that you were biased in any  
 3 way in the opinions you rendered?  
 4 A. (Mr LaPorte) No, I don't believe we're -- we were not  
 5 biased in any way whatsoever. In retrospect, you know,  
 6 maybe we could have sent an email to the Secretary to  
 7 convey to the Tribunal, and then left it at that. We  
 8 still would have been doing our duty to notify the  
 9 Tribunal. In retrospect, maybe -- because we've spent  
 10 a lot of time talking about this issue, and not really  
 11 the substance of all of the work that we did.  
 12 Q. Now, you have had the experience -- I don't want to say  
 13 that you're adverse to Mr Radley here, because you're  
 14 the Tribunal-appointed experts and each party has  
 15 a party-appointed expert. In the case of Patel v Patel,  
 16 would you consider that you were adverse to Mr Radley?  
 17 A. (Mr LaPorte) No, not really. I believe -- I'm trying to  
 18 recall the case. It's a year and a half/two years old.  
 19 So I did some ink work, and that wasn't Mr Radley's  
 20 expertise. There were some other things that were going  
 21 on with the document. I don't believe we really  
 22 differed in our examination results.  
 23 Q. But is it fair to say that you were engaged by opposite  
 24 sides in the case?  
 25 A. (Mr LaPorte) Yes.

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16:15 1 Q. Okay. Were any of the other experts involved in this  
 2 proceeding engaged on the opposite side in that case?  
 3 A. (Mr LaPorte) Yes.  
 4 Q. And who would that be?  
 5 A. (Mr LaPorte) Dr Aginsky.  
 6 Q. Okay. So was Dr Aginsky's line of work directly  
 7 relating to your work?  
 8 A. (Mr LaPorte) Yes.  
 9 Q. And would it be fair to say that you had opposing views  
 10 in that case?  
 11 A. (Mr LaPorte) Yes.  
 12 Q. Do you believe that Dr Aginsky's presence as an expert  
 13 working with the Republic of Guinea in this case has  
 14 impacted your views or affected your impartiality with  
 15 respect to our positions?  
 16 A. (Mr LaPorte) Absolutely not.  
 17 MR OSTROVE: Co-counsel Mr Jaeger has some questions for  
 18 you.  
 19 MR JAEGER: (In English) Laurent Jaeger. A follow-up  
 20 question on this issue of the opinion you made that  
 21 there might be some expert shopping.  
 22 If you had observed the same conduct from  
 23 Respondent, if you had seen Respondent change expert in  
 24 the course of the expert examination in similar  
 25 circumstances, would you have come to the same

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16:16 1 conclusion?  
 2 A. (Mr LaPorte) Yes, so I do think, just to put it in  
 3 context, it wasn't just the changing of the expert, it  
 4 was all of the other circumstances that surrounded it.  
 5 So it wasn't just one thing, but the request for the  
 6 deadline, the questions that Mr Radley posed that we  
 7 believed could be taken out of context to a certain  
 8 extent, and then sort of the change in the expert  
 9 altogether. So it's all of those circumstances, not  
 10 just a single one.  
 11 But to answer your question, yes, we would have --  
 12 if the Respondent had the same circumstances, we would  
 13 have notified the Tribunal of our concern.  
 14 Q. So is it fair to say that you reacted to the situation  
 15 that was unfolding in front of you, rather than  
 16 expressing a judgment on a party.  
 17 A. (Mr LaPorte) Yes, I think that's a fair way to put it.  
 18 Q. Now, does it go to your conception of the ethics of the  
 19 conduct of a party in the course of an expert  
 20 investigation? Was the opinion you expressed in your  
 21 report triggered by your own understanding of how  
 22 a party should behave in expert proceedings in general?  
 23 A. (Mr LaPorte) No, our opinion was based on the evidence  
 24 and how we evaluated it, which was done before --  
 25 I mean, we issued our preliminary report, which

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16:18 1 virtually had the same conclusions.  
 2 MR JAEGER: Thank you.  
 3 MR OSTROVE: I expect that most of our following questions  
 4 are going to be more directed to Mr Welch as they relate  
 5 primarily to signature analysis, and I'd like to start  
 6 with the signature of Mr Lev Ran.  
 7 Is it correct that you undertook an examination of  
 8 what is purportedly Mr Lev Ran's signature in  
 9 Exhibits R-24, R-25 and R-26?  
 10 A. (Mr Welch) That is correct.  
 11 Q. Would you characterise that signature as either a simple  
 12 signature or a complex signature?  
 13 A. (Mr Welch) I would consider it a complex signature.  
 14 Q. Have you endeavoured to indicate the various pen strokes  
 15 involved in creating that signature?  
 16 A. (Mr Welch) Yes, I have.  
 17 Q. Did you prepare any demonstrative exhibit to indicate  
 18 the direction of those pen strokes?  
 19 A. (Mr Welch) Yes, I did.  
 20 Q. Is that in the PowerPoint slides?  
 21 A. (Mr Welch) It is. Let me bring it up.  
 22 Q. Would it be this slide here, slide 9?  
 23 A. (Mr Welch) That is correct.  
 24 Q. The image that's used in this slide, is that an image  
 25 that was already in the record or is that an image that

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16:20 1 you created additionally after the submission of your  
 2 final report?  
 3 A. (Mr Welch) That was an image created after the  
 4 submission of my report.  
 5 Q. This addition of arrows, is that typically what you do  
 6 for a demonstrative exhibit when you testify?  
 7 A. (Mr Welch) That's correct.  
 8 Q. How would you define, in your understanding,  
 9 a demonstrative exhibit?  
 10 A. (Mr Welch) One that is clear to the trier of fact; that  
 11 is illustrative; that's clear and concise. And I've  
 12 provided that with arrows showing the directions of the  
 13 strokes, based on my examinations, and I find it clear  
 14 and concise.  
 15 Q. Could you just walk us through or walk the Tribunal  
 16 through the construction of Mr Lev Ran's signature and  
 17 how you came to the conclusions of the directions of the  
 18 strokes?  
 19 A. (Mr Welch) Sure.  
 20 Q. Would you rather show the slide from your own computer  
 21 to allow an arrow to point, or are you okay?  
 22 A. (Mr Welch) It might be better if I could point to some  
 23 things, so I can use mine. (Pause)  
 24 Okay. So based upon my examinations, a full and  
 25 detailed examination of the questioned signature, at

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16:21 1 point 1 is the beginning stroke. It's a light feathered  
 2 or flying start into the vertical downstroke. This  
 3 flying start suggests that the hand is in movement or in  
 4 motion holding the pen when the pen hits the paper, and  
 5 you see that fine, subtle stroke coming into the very  
 6 top of the downstroke.  
 7 PROFESSOR VAN DEN BERG: Mr Welch, may I ask you here  
 8 a discrete question, while you're going through the  
 9 numbers. How do you know this was the first stroke?  
 10 A. (Mr Welch) Because the evidence supports that. If you  
 11 look at the bottom of the stroke at point 3, typically  
 12 your ballpoint pen, when it's changing direction, that  
 13 ink builds up on the housing, and as it moves direction  
 14 it deposits what we call in our profession "gooping".  
 15 And I can see that that is on the left side of that  
 16 stroke, indicating that that is in fact the movement of  
 17 this particular stroke.  
 18 PROFESSOR VAN DEN BERG: I still ask the question: is this  
 19 the first stroke? Because I see a lot of strokes on the  
 20 signature.  
 21 A. (Mr Welch) So what I'm showing is, number 1, the pen  
 22 drag into the first initial downstroke. So I'm showing  
 23 the --  
 24 THE PRESIDENT: I think we understand well why 1 is the  
 25 first one in 1, 2, 3. The question here is: why is 1

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16:23 1 the first one, and for instance 4 is not the first one?  
 2 MR OSTROVE: Could I recommend we turn to the next slide,  
 3 slide 10?  
 4 THE PRESIDENT: Well, maybe -- I mean, the expert can  
 5 explain it.  
 6 MR OSTROVE: I withdraw my suggestion.  
 7 THE PRESIDENT: Mr Welch.  
 8 A. (Mr Welch) Yes. So we could see that the stroke at 3,  
 9 the hook coming out, slightly begins to move back to the  
 10 4 position. We also see an ink spot here (indicating),  
 11 which appears to be the movement as the pen comes into  
 12 4, sets the pen down, hits the paper, and then proceeds  
 13 up to 5, retraces back down to 6, retraces back up to 7,  
 14 7 comes back down and across that stroke, 8 comes up --  
 15 actually, 8 crosses 7, goes straight up to the top,  
 16 retraces and comes down to the left of 7, intersecting  
 17 both 5, 8 and 9. And we have another characteristic:  
 18 this nice feather terminal stroke at the end.  
 19 So the evidence to me clearly shows that it starts  
 20 up at the top, comes down to 3, up and around to 4, and  
 21 that's the movement.  
 22 We can see this movement in ... (Pause)  
 23 MR LIBSON: While there's a gap, have we got a reference  
 24 number for this?  
 25 MR OSTROVE: That was slide 9 that we were looking at.

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16:26 1 May I make suggestions of slide numbers to move  
 2 things along?  
 3 THE PRESIDENT: No, I think if we stick to the rule: it's  
 4 the expert who determines which slides may be responsive  
 5 to a question. They must know their slides.  
 6 MR DAELE: This is not the way it happened just before. If  
 7 I go to 15:23:40 (page 176, line 19), it was Mr Ostrove  
 8 who said:  
 9 "Could I recommend we turn to the next slide ...?"  
 10 THE PRESIDENT: Yes, and my reaction to this was that the  
 11 expert is the one who has to respond.  
 12 MR DAELE: Apologies. (Pause)  
 13 A. (Mr Welch) You asked -- what was your next question?  
 14 Q. I believe you were in the middle of saying:  
 15 "So the evidence to me clearly shows that it starts  
 16 up at the top, comes down to 3, up and around to 4, and  
 17 that's the movement."  
 18 And you started to say:  
 19 "We can see this movement in ..."  
 20 And I believe you were looking for an example, and  
 21 I was going to suggest an example where I believe we see  
 22 that movement, but I believe we will ask you to find  
 23 that first.  
 24 THE PRESIDENT: If Mr Welch has no other example he wants to  
 25 show us with respect to the movement, we should move on.

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16:29 1 A. (Mr Welch) I have it. I just wanted to make sure that  
 2 I wasn't showing ... (Pause)  
 3 THE PRESIDENT: What are you trying to show us? Is it the  
 4 movement from 3 to 4, which you have already explained  
 5 to me this morning, or is it something else? Because  
 6 that is something you have already explained.  
 7 A. (Mr Welch) The movement in 25 and 26.  
 8 THE PRESIDENT: Do you have a slide for this?  
 9 A. (Mr Welch) I do.  
 10 THE PRESIDENT: If you do, then you should show it to us.  
 11 Otherwise we have to move on, and Professor Mayer had  
 12 a question with respect to --  
 13 A. (Mr Welch) No, I don't have a slide for that.  
 14 THE PRESIDENT: Fine. I think Professor Mayer had  
 15 a question on 25.  
 16 PROFESSOR MAYER: Yes. Can it be put easily on the screen  
 17 again, what we were just shown?  
 18 THE PRESIDENT: Slide 9.  
 19 PROFESSOR MAYER: Slide 9. Arrow 3, we see that there's  
 20 an upward movement.  
 21 A. (Mr Welch) Correct.  
 22 PROFESSOR MAYER: Very short because the pen is lifted then,  
 23 I understand. It's to the left.  
 24 A. (Mr Welch) Correct.  
 25 PROFESSOR MAYER: Could it be to the right, up but to the

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16:31 1 right, the same person signing?  
 2 A. (Mr Welch) Could the same person have made a hook on the  
 3 right side of the downstroke?  
 4 PROFESSOR MAYER: Exactly.  
 5 A. (Mr Welch) They could have. Everybody is unique.  
 6 What's the handwriting habits? What are the  
 7 characteristics? Do they typically -- does  
 8 an individual, the range of variation, show a movement  
 9 down, up and to the left, or down and up and to the  
 10 right? It depends upon the individual. But this  
 11 particular characteristic comes down and up and to the  
 12 left.  
 13 PROFESSOR MAYER: It seems to me that at page 79 of your  
 14 report we see an example, R-26.4, in which -- unless  
 15 I don't read correctly -- it seems to go to the right.  
 16 A. (Mr Welch) What page number?  
 17 PROFESSOR MAYER: Page 79 of the report.  
 18 A. (Mr Welch) Yes, this particular signature on page 79  
 19 comes down and tapers down to the right -- I'm sorry,  
 20 I was talking about the terminal stroke.  
 21 Yes, the initial vertical stroke comes down and  
 22 immediately moves to the right. In the right, you will  
 23 see a nice pen drag in that direction. So what we saw  
 24 in slide 9 is that downstroke comes down, up and to the  
 25 left, and then moves back into the 4 position. So the

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16:33 1 habit or the movement is the same: it comes up, down,  
 2 up, and then comes over to the 4 position. And I show  
 3 you here (indicating).  
 4 MR OSTROVE: For the record, that's slide 10.  
 5 A. (Mr Welch) It's slide 10.  
 6 PROFESSOR MAYER: Okay, thanks.  
 7 THE PRESIDENT: If I compare at least the picture that  
 8 results from the movement on page 53 and on page 79,  
 9 that is on R-25.2 and on --  
 10 A. (Mr Welch) 53?  
 11 THE PRESIDENT: Yes. And then compare that with page 79.  
 12 A. (Mr Welch) Okay, yes.  
 13 THE PRESIDENT: The initial stroke is very different in  
 14 terms of placement and movement, in the sense of the  
 15 continuation. How do you explain this?  
 16 A. (Mr Welch) So everybody has a range of variation in  
 17 their writing, and again, this is what we talk about  
 18 when we talk about variation. Not everybody signs their  
 19 name the same way twice.  
 20 THE PRESIDENT: We understand all that. But still --  
 21 A. (Mr Welch) So this movement is essentially -- it's very  
 22 similar in the fact that this comes in -- on page 53 it  
 23 comes up and then moves back and to the right, and on  
 24 page 79 it comes down and immediately moves to the  
 25 right. That's just variation.

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16:35 1 THE PRESIDENT: But that movement from 3 to 4 looks quite  
 2 different in 53 and 79, for a layperson.  
 3 A. (Mr Welch) Correct, for a layperson, it will.  
 4 THE PRESIDENT: Either it goes like this or like this  
 5 (indicating).  
 6 A. (Mr Welch) But we see this in the handwriting habits of  
 7 Mr Avraham Lev Ran. I can show you examples where he  
 8 does this.  
 9 THE PRESIDENT: Thank you. You may carry on.  
 10 MR OSTROVE: Thank you, Madam President.  
 11 In fact, that goes directly to one of the points  
 12 I wanted to raise with you, which is: could you explain  
 13 in the professional parlance the difference, if any,  
 14 between differences and variations?  
 15 A. (Mr Welch) Sure, absolutely. A difference in  
 16 handwriting examination is fundamental, and it's  
 17 indicative of another writer.  
 18 So we have similarities, when you see in my report  
 19 I talk about similar handwriting characteristics and  
 20 dissimilar handwriting characteristics. And again, the  
 21 evaluation of variation, because one single stroke might  
 22 be a little bit longer than another, than we see in  
 23 a known standard, because it's dissimilar, and it's  
 24 slightly dissimilar in its length, doesn't mean that  
 25 somebody else wrote it. It's easily attributed to

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16:37 1 variation in the individual's writing.  
 2 So I can show a very good example of that in one of  
 3 my slides which I think will help everybody understand  
 4 the significance of variation. (Pause)  
 5 These are four known signatures of Marc Struik.  
 6 This is slide 33 of 66. Here's a perfect example of  
 7 variation in an individual's writing. If you look at  
 8 K1.2, K10.3, K17.13 and K18.2, if we look at this "S"  
 9 formation or "S"-shaped formation, where the arrow is --  
 10 let's look at 1.2. You see it comes out of that tall  
 11 loop, arcs up to the top, retraces down, moves over to  
 12 the left, and then actually comes down and loops back  
 13 up, arches back up into the next loop.  
 14 If we look at K10.3 --  
 15 Q. I'm sorry, could I suggest you go out of presentation  
 16 mode, so that we can actually see your cursor.  
 17 A. I'm sorry. (Pause)  
 18 So here we see the stroke comes up, retraces down,  
 19 comes back over, arches back down, and up into the next  
 20 stroke.  
 21 If we look at the next undisputed and known writing  
 22 sample of Mr Struik, we see the same stroke, the same  
 23 form comes up, retraces down, comes down to the bottom,  
 24 loops back up, crosses back over, down, and back into  
 25 the next stroke; completely different than K1.2.

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16:39 1 But again, these are known signatures of Mr Struik,  
 2 which is well within -- this is showing variation in  
 3 everybody's writing. We all have this.  
 4 Q. If I ask you: is that a difference between the first  
 5 two, in a professional term? Do you consider that  
 6 a difference?  
 7 A. (Mr Welch) I would consider it a dissimilarity until  
 8 I could put it in its rightful place. Is it  
 9 fundamentally different, meaning it's evidence of  
 10 somebody else writing that, or is it a variation of  
 11 a stroke, or is it even an accidental stroke, an extra  
 12 movement that he makes by accident? Everybody, when  
 13 they sign their name over their lifetime, makes  
 14 accidental strokes in their signatures.  
 15 THE PRESIDENT: We understand that. I'm just not sure, when  
 16 you say "dissimilar", is that synonymous to "different",  
 17 and then you have a higher degree of difference which is  
 18 a "fundamental difference", or how is exactly the  
 19 terminology that you use?  
 20 A. (Mr Welch) Yes, the terminology: when we talk about  
 21 a "fundamental difference", it is fundamentally  
 22 different and indicative of a different writer.  
 23 THE PRESIDENT: That is clear. Now, when you speak of  
 24 a "difference" -- or is this not something that --  
 25 A. (Mr Welch) That's what I'm saying. If it's

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16:40 1 a difference --  
 2 THE PRESIDENT: When you say "difference", it means  
 3 fundamental difference?  
 4 A. (Mr Welch) Indicative of a different writer, that's  
 5 correct.  
 6 THE PRESIDENT: When you say "dissimilar", what does it  
 7 mean?  
 8 A. (Mr Welch) It's means it's dissimilar, but I can't place  
 9 the significance on it. I can't say it's indicative of  
 10 another writer or it's attributed to his range of  
 11 variation.  
 12 THE PRESIDENT: When you say "variation", it necessarily  
 13 implies that it is the same writer?  
 14 A. (Mr Welch) It just depends. Is this movement exhibited  
 15 in -- if I had these two signatures to look at, and  
 16 I had all these similarities and agreement, but I had  
 17 this form that was dissimilar between each other, right,  
 18 I don't know -- I can't put it in its rightful place  
 19 with respect to its significance unless I had additional  
 20 writing samples, right? All I could say is: it's  
 21 dissimilar. I can't say it's necessarily indicative of  
 22 a person, of another writer; I just don't know.  
 23 THE PRESIDENT: When you use the word "variation", as you  
 24 did here, it necessarily means that it is the same  
 25 person writing; it's just --

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16:42 1 A. (Mr Welch) Correct. It's exhibited in their handwriting  
 2 habits.  
 3 THE PRESIDENT: Thank you.  
 4 A. (Mr Welch) So the reason why I wanted to illustrate this  
 5 for you is so that you can see that each person does  
 6 have variation in their writing and how they may write  
 7 their signature. And if you look at that "S" form in  
 8 17.13, you can see that form is a little bit different  
 9 or dissimilar than 1.2 and 10.3, and then even 18.2 is  
 10 different than all of them. But the four represent  
 11 a range of variation for how he makes that character.  
 12 MR OSTROVE: So going back then to the questions that were  
 13 presented to you in the form of comments on your  
 14 preliminary report.  
 15 When, for example, in question 35 you were asked,  
 16 "please explain in further detail what differences (if  
 17 any) the Tribunal-appointed Experts identified between  
 18 the signature of Marc Struik on R-27 and those in the  
 19 comparator documents and the relevance of each point",  
 20 could you explain the portion of your answer when you  
 21 say, "There is no evidence of any difference that would  
 22 suggest someone other than Marc Struik signed the  
 23 document"?  
 24 A. (Mr Welch) Correct, I did not find any differences that  
 25 would be indicative of another writer.

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16:43 1 Q. If we go back to Mr Lev Ran as one example, at  
 2 paragraph 252 of Mr Radley's report he discusses the  
 3 vertical strokes, which is I believe what you described  
 4 as the first, second and third movements of the ...  
 5 A. (Mr Welch) One second. What page of Mr Radley's report?  
 6 Q. Sorry, page 54.  
 7 A. (Mr Welch) 54, okay.  
 8 Q. It's in section 10, which starts on page 53, "Radley  
 9 opinion concerning the authenticity of the Avraham  
 10 Lev Ran signature on R24 -- R26".  
 11 A. (Mr Welch) Correct.  
 12 Q. So putting this in context, in paragraph 248 he says:  
 13 "The very important feature that I note with respect  
 14 to these three signatures is that they all have  
 15 irregularities in one stroke not found within the  
 16 47 comparison signatures presented."  
 17 A. (Mr Welch) Correct.  
 18 Q. Then he goes on, and in paragraph 251 he notes:  
 19 "... a 'star' shape ... [with] unusual ...  
 20 protrusion either side of the main line from point 2 to  
 21 point 3 illustrated at 'B' and 'C'. "  
 22 A. (Mr Welch) Correct.  
 23 Q. The at paragraph 252 he says:  
 24 "One can also note that these vertical strokes in  
 25 R24 and R25 are disproportionately long relative to the

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16:45 1 stroke that determines the width of these signatures,  
 2 i.e. the stroke from point 2 to point 3 (the lengths of  
 3 these strokes are denoted by the red dotted lines)."  
 4 Which are at the bottom of page 53 of his report.  
 5 A. (Mr Welch) Correct.  
 6 Q. "On measuring the same, these vertical strokes are  
 7 significantly longer in relative terms than the  
 8 corresponding ratio of lengths seen in all the  
 9 comparison material."  
 10 Just focusing on that last difference, do you have  
 11 any reaction to what Mr Radley appears to be stating --  
 12 I don't want to put words in his mouth; I'm not sure  
 13 that he actually calls them a difference. But do you  
 14 agree with him that the strokes are "significantly  
 15 longer in relative terms than the corresponding ratio of  
 16 lengths seen in all the comparison materials"?  
 17 A. In 24 and 25, no -- I'm sorry, in 24 and 26, no. But in  
 18 25 the downstroke is slightly, minimally longer, and  
 19 I attribute that to variation.  
 20 You know, the relationship in that particular  
 21 section of the report that you point to where he points  
 22 to the proportion of point B and point C, I see that all  
 23 over in the known handwriting standards of Avraham  
 24 Lev Ran. I mean, it's a consistent habit, that  
 25 proportion spacing, and I have an image of that that

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16:47 1 I can show. But it goes along with his range of  
 2 variation.  
 3 Q. When you say "an image of that that [you] can show", is  
 4 that an image that's taken from a document in the record  
 5 or is it an additional new image?  
 6 A. (Mr Welch) No, it would be an additional new image.  
 7 Q. I'm sorry?  
 8 A. (Mr Welch) An additional new image.  
 9 Q. Sorry, the --  
 10 A. (Mr Welch) It's in my PowerPoint.  
 11 Q. Did you use for the PowerPoint a photograph of  
 12 a document that was not in the record or did you create  
 13 a demonstrative exhibit from it?  
 14 A. (Mr Welch) I created a demonstrative exhibit.  
 15 Q. Could you show us that demonstrative exhibit, please?  
 16 A. (Mr Welch) Yes. (Pause) Here we go, slide 16.  
 17 THE PRESIDENT: Just to understand what you have done here,  
 18 these are all photographs that are either in your  
 19 report, reproduced in your report or contained in the  
 20 annexes to your report?  
 21 A. (Mr Welch) No. All the images are, yes, absolutely.  
 22 These are in the annexes.  
 23 THE PRESIDENT: What you have added are the arrows and other  
 24 marks?  
 25 A. (Mr Welch) That's correct.

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16:49 1 THE PRESIDENT: Yes. But the images are those that are in  
 2 your annexes; is that right?  
 3 A. (Mr Welch) Yes, ma'am.  
 4 THE PRESIDENT: Thank you.  
 5 A. (Mr Welch) So this shows the relationship in  
 6 C-0271-287.8, .12, .19 and .33. You can see that  
 7 relationship from the top of the stroke B, that  
 8 relationship is narrower than the same relationship from  
 9 the bottom of the stroke to that central stroke in C.  
 10 You can see these in each of them. So the B is  
 11 narrower, that proportion is narrower, and wider in C.  
 12 And you can see that throughout, there's even more  
 13 samples of this. So that proportion is with the  
 14 handwriting variation of Mr Avraham Lev Ran.  
 15 MR OSTROVE: So do you agree or disagree with Mr Radley's  
 16 conclusion that this feature could be a difference  
 17 that --  
 18 A. (Mr Welch) Absolutely disagree. It's contained -- you  
 19 can see it. These are known signature samples of  
 20 Mr Avraham Lev Ran.  
 21 Q. Thank you.  
 22 I would like to move on to the signatures of  
 23 Mr Asher Avidan.  
 24 A. (Mr Welch) Okay.  
 25 Q. Is it correct that you undertook an examination of what

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16:51 1 was purported to be a signature of Mr Avidan in  
 2 Exhibits R-28 and R-29?  
 3 A. (Mr Welch) Correct.  
 4 Q. Do you consider Mr Avidan's signature to be a simple or  
 5 a complex signature?  
 6 A. (Mr Welch) A complex signature.  
 7 Q. Did you prepare any demonstrative exhibit in order to  
 8 indicate the strokes that appear in Mr Avidan's  
 9 signature?  
 10 A. (Mr Welch) Yes, I did.  
 11 Q. Would you mind showing that to us, please, and  
 12 explaining it to us?  
 13 A. (Mr Welch) Sure.  
 14 MR DAELE: Apologies, Madam President, but this is now again  
 15 another example where it is Mr Ostrove who invites the  
 16 expert to produce one of these slides.  
 17 MR OSTROVE: I am simply asking him if he has --  
 18 THE PRESIDENT: Yes --  
 19 MR DAELE: Do you mind showing to us, please?  
 20 MR OSTROVE: I asked him after I asked him if he had  
 21 a slide.  
 22 THE PRESIDENT: The question is, and it is certainly of  
 23 interest to us: is it a complex signature? Yes, it is.  
 24 That's what you have answered.  
 25 A. (Mr Welch) Yes.

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16:52 1 THE PRESIDENT: How does the movement run? And now you  
 2 could explain it, and say, "By the way, I have  
 3 a demonstrative".  
 4 Q. (Mr Welch) Sure, yes.  
 5 THE PRESIDENT: That may be the better way of asking the  
 6 question.  
 7 A. (Mr Welch) Sure. I do have a demonstrative to  
 8 illustrate the complexity of these two particular  
 9 signatures.  
 10 THE PRESIDENT: That is slide 41?  
 11 A. (Mr Welch) That will be slide 41 of 66.  
 12 MR OSTROVE: So what do we learn from -- could you explain  
 13 your analysis of his signature?  
 14 A. (Mr Welch) Sure.  
 15 Based upon my examinations, microscopic  
 16 examinations, if we look at R-28, we can see the 1 moves  
 17 up and around; 2 -- and we can just follow the numbers,  
 18 and for the sake of time I'm not going to go through  
 19 them all. But there's essentially 19 different  
 20 movements within this particular signature, and  
 21 I consider this a very complex signature.  
 22 We could see the same in R-29, only there's  
 23 approximately 21 different movements in this particular  
 24 signature.  
 25 Q. In your experience, is it easy or difficult for

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16:54 1 a forger, or a determined forger, to forge a signature  
 2 of this type?  
 3 A. (Mr Welch) Absolutely.  
 4 Q. Sorry, is it easy or difficult?  
 5 A. (Mr Welch) Oh, I'm sorry. Absolutely, it is more  
 6 difficult, and I would say it couldn't be done with all  
 7 the fine and subtle details that are contained within  
 8 the signatures that fit within the range of variation of  
 9 Mr Avidan Asher.  
 10 Q. If I could ask you then to turn to -- I'm sorry. Did  
 11 you find any significant differences between the  
 12 signatures of Mr Avidan on the questioned documents as  
 13 compared to his known documents?  
 14 A. (Mr Welch) No, I did not.  
 15 THE PRESIDENT: While we're on this slide, before we move  
 16 on, can we just ask a question.  
 17 Does it occur, in your experience, that there's  
 18 a difference in number of movements in the signature?  
 19 Is it within variations that are observable?  
 20 A. (Mr Welch) Yes, that's a great question. It all goes to  
 21 variation with respect to the individual and the  
 22 strokes.  
 23 And then some of the movements sometimes, if you  
 24 have a long pen drag going into a movement, you know,  
 25 that's obviously going to be -- when I'm doing my

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16:55 1 microscopic examination and making my notes, that's  
 2 going to be something that I mark as the first movement.  
 3 If it's a blunt start, where the pen just is simply  
 4 placed down and then a vertical line drawn down, that  
 5 would be my number 1. So if there's a flying start or  
 6 a flying finish, that may add a couple of extra numbers.  
 7 So you can't look at -- when you're looking at  
 8 formation, you can't look necessarily at the numbers and  
 9 say: oh, well, if there's two more extra movements, it  
 10 means it must be a different writer. No, that's not the  
 11 case. It all goes to variation, you're absolutely  
 12 correct.  
 13 THE PRESIDENT: Does it just mean that you're just marking  
 14 it differently, or is there really a different movement  
 15 of the hand?  
 16 A. (Mr Welch) The movement is the same; it's just the fine,  
 17 subtle features that I'm picking up that may add to it.  
 18 So let me give you an example --  
 19 THE PRESIDENT: We can see it, for instance, here in 1, 2,  
 20 3, and compare the 2. The 3 is --  
 21 A. (Mr Welch) Exactly, that's a perfect example.  
 22 PROFESSOR VAN DEN BERG: Whilst we are on this document, you  
 23 also stated you had not seen before, but then after your  
 24 preliminary report came the Exhibit C-0112, with the  
 25 label "forged" on it?

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16:57 1 A. (Mr Welch) Never saw that document.  
 2 PROFESSOR VAN DEN BERG: You have never seen the document?  
 3 I see. There is a similar one for R-29, which is  
 4 C-0113. You haven't seen that either?  
 5 A. (Mr Welch) None of the documents marked "forged".  
 6 PROFESSOR VAN DEN BERG: An interesting point there is that  
 7 the signature of Ms Touré is in a different place and  
 8 has an additional stamp. Maybe it can be shown later  
 9 on, but we should ask the question on our time.  
 10 MR OSTROVE: I don't mind whether you take your time now or  
 11 later. Of course, I was just going to point out that  
 12 I don't believe the experts have seen that document, so  
 13 they haven't had a chance to study. But perhaps we  
 14 could provide it to them later.  
 15 PROFESSOR VAN DEN BERG: Maybe it can be shown later.  
 16 MR OSTROVE: Thank you.  
 17 Mr Welch, Mr Radley, starting at the bottom of  
 18 page 61 of his report, addresses the signatures in the  
 19 name of Asher Avidan in R-28 and R-29.  
 20 A. (Mr Welch) One second. (Pause) Okay, I'm sorry, what  
 21 page?  
 22 Q. The bottom of page 61 and going on to page 62 in his  
 23 report.  
 24 A. (Mr Welch) Okay.  
 25 Q. He criticises your position that:

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16:58 1 "... there is no 'evidence of differences that would  
 2 suggest someone other than Asher Avidan signed the  
 3 document' ..."  
 4 That's in paragraph 289. Then in paragraph 290 he  
 5 goes on to say:  
 6 "On comparing the questioned signatures in the name  
 7 of Mr Avidan ... with the comparison documents  
 8 presented, there again, appear to be a number of  
 9 differences, as follows."  
 10 And then he has a diagram indicating -- it looks  
 11 like it should be indicating four differences; only  
 12 three are numbered. And then in paragraphs 291 through  
 13 294, he lists what he considers four differences.  
 14 Have you a chance to consider these paragraphs?  
 15 A. (Mr Welch) Absolutely.  
 16 Q. Do you have any response?  
 17 A. (Mr Welch) Yes, I have some -- actually I completely  
 18 disagree with this, these statements here, and I do have  
 19 some images to illustrate.  
 20 Q. As you discussed, if you could take what Mr Radley  
 21 presented as differences one by one, so we can follow,  
 22 that would be helpful.  
 23 A. (Mr Welch) Sure.  
 24 The first dissimilarity that he talks about the  
 25 relationship of this "S"-shaped form in ... (Pause)

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17:00 1 Q. If you told me the slide, I could put it up from my  
 2 computer.  
 3 A. (Mr Welch) It's going to be 44 of 66.  
 4 In this particular image you can see that Mr Radley  
 5 addresses the vertical dotted line. The upper and lower  
 6 arched movements in that particular signature are in  
 7 line with that dotted line. And we can see in the  
 8 similar handwriting habits within the range of variation  
 9 of Mr Avidan Asher, you can see this in K13.2 and K22,  
 10 where again the top and bottom arched movements of that  
 11 "S"-shaped form in K13.2 touch, and then the top nearly  
 12 touches, and the bottom does in fact touch in K22. So  
 13 that is absolutely within Mr Avidan Asher's range of  
 14 variation.  
 15 Q. Okay. That's with respect to paragraph 291, Mr Radley's  
 16 first purported difference?  
 17 A. (Mr Welch) That's correct.  
 18 Q. Could you address his second purported difference? He  
 19 says:  
 20 "From the end of the bottom 'S' shape in R28, there  
 21 is a long horizontal stroke that then bends and forms  
 22 a curved dome in an anticlockwise direction. The way in  
 23 which the horizontal transforms into the arc of the dome  
 24 is very rounded with a relatively large radius  
 25 curvature. Generally, the change of direction is fairly

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17:03 1 sharp in the known writings."  
 2 A. (Mr Welch) Correct.  
 3 Q. Do you agree that that's a difference with the known  
 4 writings?  
 5 A. (Mr Welch) Absolutely not. It is well within  
 6 Mr Avidan's range of variation, and I completely  
 7 disagree with that.  
 8 I have an image of that, to illustrate it: that  
 9 would be slide 46 of 66. In the red-boxed area is the  
 10 particular feature or element that Mr Radley was  
 11 addressing, at the very end where it's curved. What  
 12 I did was I made enlargements of that same element for  
 13 R-28 down below, I enlarged them so everybody could see  
 14 it clearly, and then we see that K20.59, K20.58 and  
 15 K20.61 have that same curved end to it, which is very  
 16 similar and well within Mr Avidan's range of variation.  
 17 It is not a difference whatsoever.  
 18 Q. Thank you.  
 19 Moving on to Mr Radley's third point of difference,  
 20 where he says in paragraph 293:  
 21 "Beneath the main portion of the signature, the  
 22 known signatures show a clockwise looped pen movement  
 23 with an extended downward tail similar to the shape of  
 24 a crossed '9'. Whilst there is a form of reproduction  
 25 of that form in R28, there is no significant loop

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17:04 1 whatsoever. This absence of a loop, merely a sideways  
 2 'V' shape, is not seen in any of the known signatures."  
 3 Do you agree with that statement?  
 4 A. (Mr Welch) I agree in part and disagree in parts. The  
 5 movement is similar; it does not have the same size loop  
 6 in all of the other signatures. And I've put together  
 7 an illustration to show that.  
 8 Q. Where is that illustration?  
 9 A. (Mr Welch) Let me bring it up. That's going to be  
 10 slide 48 of 66.  
 11 Q. Could I ask you to explain this demonstrative, please?  
 12 A. (Mr Welch) Sure.  
 13 So this particular -- R-28 -- I've got each of the  
 14 signatures, R-28, the known two exemplars that I'm  
 15 showing, K22 and K20.61, to show that Mr Avidan in K22  
 16 and K20.61 has a vast range of variation in how he makes  
 17 that particular movement. You look at the size, how  
 18 small and upright K22 is, and in K20.61 you see how wide  
 19 and how a particular loop moves up and to the left, to  
 20 the 10 o'clock position.  
 21 The fact that in R-28 we've got a similar movement  
 22 where it comes up and around, it's nearly a retrace.  
 23 There almost appears to be a small loop; you can't see  
 24 it, I'm sorry. But the movement is similar, very  
 25 similar; you just don't have the size of the loop.

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17:06 1 But I don't attribute this as a difference  
 2 indicating a different writer, and I would attribute  
 3 this to variation.  
 4 Q. Moving on to the final purported difference identified  
 5 by Mr Radley at paragraph 294 of his report. He says:  
 6 "The element (short 'L' shaped line) towards the top  
 7 right hand corner of the signature in R28 ..."  
 8 I believe it's this little element that I'm  
 9 indicating with my mouse that he's talking about here:  
 10 "... towards the top right hand corner of the  
 11 signature in R28 appears to show the pen hitting the  
 12 paper, moving slightly downwards before turning at near  
 13 right angles. To make such a turn, the pen has to  
 14 virtually stop and then turn ... In the known writings,  
 15 this element is shown in various forms but generally,  
 16 the marking on the paper is the result of  
 17 an introductory stroke as the pen is still moving to the  
 18 commencement of the horizontal stroke, not  
 19 a right angled introductory stroke as seen in the  
 20 questioned signature. It is acknowledged that this is  
 21 quite a variable structure in the known writings and  
 22 I attribute little significance to this observation  
 23 albeit there is no example in the comparisons in this  
 24 form."  
 25 So again, I'm not sure that Mr Radley -- who can

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17:08 1 clarify tomorrow -- considers this to be a difference.  
 2 But in your view, is there any significance to this?  
 3 A. (Mr Welch) Yes, I would absolutely disagree and say it's  
 4 not a difference. There's a good example in this that  
 5 fits within the range of variation of Mr Avidan Asher.  
 6 I've put together a display or an image to  
 7 illustrate this. You can see in slide 50 of 66, if you  
 8 look at the first image, R-28, I'm showing the entire  
 9 signature itself, with the arrow, and then I'm showing  
 10 the particular stroke that Mr Radley is addressing,  
 11 directly to the right of the R-28 signature. You can  
 12 see that the movement slightly comes down, and then  
 13 begins to curve and go out to the right, where it  
 14 feathers.  
 15 You can see the same movement in K23.3. I showed  
 16 an image of the signature itself, and then  
 17 an enlargement of the same similar type of "L" stroke,  
 18 where it starts up, comes down, and moves out to the  
 19 right and tapers into a nice fine stroke. That is  
 20 exhibited in his known comparison standards and  
 21 representative within his range of variation.  
 22 Q. Thank you.  
 23 Mr Radley makes some similar criticisms regarding  
 24 your analysis of the purported signature of Mr Asher  
 25 Avidan in R-29, and it's points that are at

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17:09 1 paragraphs 297, 298 and 300. There are three points of  
 2 his report.  
 3 The first criticism he makes is that:  
 4 "The supposedly smooth curving stroke representing  
 5 the 'diagonal' of the 'S' shape has an irregular  
 6 clockwise bend in it ... not seen in any of the known  
 7 writings. This ... somewhat awkward stroke is out of  
 8 keeping with the mode of execution of the known writings  
 9 but is the type of feature sometimes observed in  
 10 simulations."  
 11 Do you agree with Mr Radley?  
 12 A. (Mr Welch) No, I do not.  
 13 Q. Could you explain why, please?  
 14 A. (Mr Welch) Yes. We can see other evidence within  
 15 Mr Asher's known comparison standards where he has this  
 16 variation exhibited in the downstroke, in this  
 17 odd-shaped -- what[ever] his terminology was.  
 18 Q. "Awkward stroke".  
 19 A. (Mr Welch) "Awkward stroke". We see this. We see this  
 20 in this particular stroke.  
 21 And if you go to -- I prepared a slide, slide 53 of  
 22 66. We see that this similar type of odd stroke, it's  
 23 not exactly the same, but you can see it in this "S"  
 24 form in K22 and in K13.2. If you look at K22, you can  
 25 see the odd-shaped movements. There appear to be three

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17:11 1 different movements in that; it's not smooth. And we  
 2 can see even another odd-shaped movement in that  
 3 particular form with respect to 13.2.  
 4 So I don't want to attribute that at all to being  
 5 characteristic of a simulation. There are far too many  
 6 individual, unique, very subtle and fine details in the  
 7 signature to ever call this or suggest that this would  
 8 be a forgery by way of simulation.  
 9 Q. Thank you.  
 10 Looking at Mr Radley's second purported difference  
 11 with respect to the signature in R-29, he notes at  
 12 paragraph 298 of his report:  
 13 "Through the looped '9' shaped element beneath the  
 14 left hand side ..."  
 15 Which I believe, if I can get my cursor, is this  
 16 little element here that I'm indicating on the screen,  
 17 on the bottom left.  
 18 A. (Mr Welch) Correct.  
 19 Q. "... there is a reproduction of what should be the  
 20 rapidly written horizontal dash (often with a hook into  
 21 the beginning of it on the left in the comparison  
 22 signatures). In the known writings, it is clearly very  
 23 rapidly executed with smooth movement of the pen and  
 24 tapering on the right-hand side as the pen speeds in the  
 25 rightward direction flying from the paper. R29 can be

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17:12 1 seen to be a waved line (not conducive with a fluent  
 2 dashed off, 'flying' pen movement)."  
 3 Then he says in an additional comment:  
 4 "Furthermore, instead of being tapered at the end  
 5 ... there appears to be a very slight downward hook  
 6 i.e. the pen has come to a near stop before flicking off  
 7 the paper in a downward direction (unlike the known  
 8 writings where the pen comes off the paper towards  
 9 '3 o'clock')."  
 10 Do you agree with Mr Radley that that's a difference  
 11 compared to the known writings?  
 12 A. (Mr Welch) Absolutely not, not a difference. And this  
 13 actually very much goes to genuineness in this  
 14 particular instance.  
 15 And I prepared an image for illustration. It would  
 16 be slide 55 of 66. The stroke that we're talking about  
 17 is this numeral "9"-shaped form and a cross-stroke. In  
 18 Mr Radley's evaluation of this particular cross-stroke,  
 19 he appears to be confusing where the line intersects for  
 20 the cross-stroke with the beginning stroke of the  
 21 numeral "9", and mistakenly does so.  
 22 Actually, if you look at this particular signature,  
 23 that cross-stroke -- and I've removed it for sake of  
 24 example, so that you can absolutely clearly see it. And  
 25 then I've showed samples in the known writing of

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17:14 1 Mr Asher where this same subtle movement going into the  
 2 "9" is seen in CWS-10.5 where the red arrow is, and  
 3 K13.2 where the red arrow is, and K13.4 where the red  
 4 arrow is. But you see that similar movement in 10.5,  
 5 13.2 and 13.4, which is very similar with his  
 6 handwriting habit.  
 7 When you look at the cross-stroke itself, you can  
 8 see it's very, very similar with K13.4: it's an upward  
 9 movement, and out and to the right. And you can see  
 10 that same up and out to the right movement in K20.59.  
 11 MR DAELE: Excuse me, Madam President. May I intervene for  
 12 a second?  
 13 I think for the last 25 minutes Mr Ostrove has been  
 14 taking the expert through his own presentation. So  
 15 basically there's a comment of Mr Ostrove, he says  
 16 "Mr Radley so-and-so", and this is on one particular  
 17 slide, and then we see immediately the expert then  
 18 saying, "Oh, yes", and then coming on to the following  
 19 slide of the presentation.  
 20 So basically for already half an hour we are going  
 21 through this presentation that is basically not on the  
 22 record. Each slide follows --  
 23 THE PRESIDENT: Yes, I've noted the same. Actually I have  
 24 the same questions for the experts, because obviously  
 25 I have reviewed what Mr Radley has said and it is

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17:16 1 important to understand what these experts have to say  
 2 on this criticism, as it is important to hear Mr Radley  
 3 tomorrow and see how he responds to the answers that we  
 4 hear today. I'm afraid that if we don't go into this  
 5 exercise, we are not making progress.  
 6 MR DAELE: But he --  
 7 THE PRESIDENT: That is why we let it go like this.  
 8 MR DAELE: But in practice we are bringing this on the  
 9 record.  
 10 THE PRESIDENT: But this is just --  
 11 MR DAELE: It's already for half an hour, slide after slide.  
 12 If you would look at the questions and you look at the  
 13 response, they're actually reading the other report that  
 14 is not on the record and should not be on the record.  
 15 MR OSTROVE: If I may, the other report is not on the  
 16 record. I honestly don't understand the objection,  
 17 because essentially what my colleagues are asking is  
 18 that we not ask the Tribunal experts their comments on  
 19 Mr Radley's criticisms. If we did it without any  
 20 demonstrative exhibits, they would have to take us step  
 21 by step, pulling out the known documents and the  
 22 comparison documents. It happens that -- and this is  
 23 obviously an issue that was discussed with the Tribunal  
 24 this morning -- they prepared demonstrative exhibits, we  
 25 believe perfectly in conformity with the procedural

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17:18 1 order.  
 2 I'm simply asking them for their explanations. If  
 3 they have demonstrative exhibits, I would say that the  
 4 entire slide presentation, which includes text  
 5 explaining their positions as a presentation, has,  
 6 I believe, unfortunately not been admitted. But I don't  
 7 see any reason why they shouldn't be allowed to use  
 8 demonstratives. I can almost not imagine expert  
 9 evidence like this without demonstrative exhibits.  
 10 THE PRESIDENT: Give us a few moments.  
 11 (The members of the Tribunal confer)  
 12 THE PRESIDENT: The Tribunal considers that the line of  
 13 questions is admissible. It does not ask questions on  
 14 the PowerPoints; it does ask questions on Mr Radley's  
 15 report. And obviously the Tribunal is interested in  
 16 being enlightened about the criticism that Mr Radley has  
 17 raised to these experts' reports, and it is important to  
 18 us that we understand their answers, and we can test  
 19 tomorrow Mr Radley's views on the answers.  
 20 So we should please proceed.  
 21 MR OSTROVE: Thank you, Madam President.  
 22 Mr Welch, the last purported difference in  
 23 Mr Avidan's signature in Exhibit R-29 raised by  
 24 Mr Radley is at paragraphs 300 to 301 of his report, and  
 25 it relates to:

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17:20 1 "After the 'S' shape, the ... terminal loop."  
 2 Which I believe is this part of the signature that  
 3 I'm indicating on the screen. He says it "proceeds as  
 4 illustrated by the arrow on the photograph above", which  
 5 is in his report on page 64. Let me just quickly read  
 6 it into the record:  
 7 "The loop proceeds as illustrated ... and bends  
 8 rather angularly ..."  
 9 He indicates going in his report 1, 2 and then 3:  
 10 "... almost vertically, [then] descends. It then  
 11 bends once again, towards '5 o'clock' [at the end]  
 12 i.e. this loop is made up of a long stroke, a following  
 13 bend and yet a further bend [emphasised]. The pen is  
 14 not flying off the paper at the terminal position. The  
 15 known writings do not show this pen lifting motion and  
 16 are quite different. They show the pen to loop around  
 17 and terminate with the pen rapidly flying off the paper  
 18 either without a significant bend or, if there is  
 19 a bend, there is only one bend.  
 20 "The angular bending of this questioned signal  
 21 terminal therefore appears 'drawn' at this point with  
 22 the fingers forcing the pen threw a tight angular curve,  
 23 the pen lifting off the paper towards '5 o'clock'.  
 24 Do you agree with Mr Radley that this presents  
 25 a significant difference from the known writings of

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17:21 1 Mr Avidan?  
 2 A. (Mr Welch) I completely disagree with Mr Radley on this  
 3 particular point.  
 4 Q. Could you explain why?  
 5 A. (Mr Welch) Absolutely. I've put together  
 6 an illustration to show this. The characteristic is  
 7 well within the handwriting habits and variation of  
 8 Mr Asher.  
 9 If you look at slide 57 of 66, I've provided  
 10 an illustration. This is an illustration of the  
 11 similarity in the terminal loop. If we look at R-29,  
 12 which is the first image, I have an arrow pointing to  
 13 the loop, and then directly to the right of that, I have  
 14 an enlargement of that particular element. And we can  
 15 see, as it comes across all the way to the end of the  
 16 stroke, it begins to move up, it comes up, and then  
 17 comes down where the second arrow is.  
 18 You see that this particular formation is very  
 19 similar with K20.59. I've got the signature of K20.59  
 20 with the arrow to the loop, and then I have  
 21 an enlargement. Very similar.  
 22 There is no evidence -- there is no drawn appearance  
 23 whatsoever in this particular loop. It's very fluently  
 24 and very naturally written. You can see the tapered  
 25 stroke. These are very similar, and these are very

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17:23 1 unique and individualised when comparing the questioned  
 2 signature in this element with the known writing of  
 3 Mr Avidan Asher.  
 4 Q. So, having reviewed all of Mr Radley's suggested  
 5 differences, do you have any changes that you would like  
 6 to make to your opinion regarding the authenticity of  
 7 Mr Avidan's signature?  
 8 A. (Mr Welch) Absolutely not. I stand by my opinion 100%,  
 9 all of them.  
 10 Q. Thank you.  
 11 I would like to turn to Mr Radley's comments on your  
 12 analysis of the signature of Marc Struik. His analysis  
 13 is in section 11 of his report on page 57, beginning at  
 14 paragraph 266.  
 15 He points out in paragraph 268 that in Annex L,  
 16 question 35 asked whether you'd found any differences  
 17 between the signature of Mr Struik in R-27 and the  
 18 comparison writings. Do you find any differences?  
 19 A. (Mr Welch) No, I found no differences that would be  
 20 indicative of another writer at all.  
 21 Q. If you turn over the page to page 59 of Mr Radley's  
 22 reports, he has a demonstrative exhibit inserted in his  
 23 report that illustrates nine alleged differences. In  
 24 the interests of time, I'm not sure I'll be able to take  
 25 you through all of them, but I was wondering if you

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17:24 1 could please comment on these.  
 2 But if you could start, I would like to have your  
 3 view as to whether Mr Struik's signature is a simple or  
 4 a complex signature.  
 5 A. (Mr Welch) This is a complex signature also.  
 6 Q. Do you have a sense of how many strokes there are in  
 7 this signature?  
 8 A. (Mr Welch) Yes, there are approximately 20 movements or  
 9 points of reference in the formation of this particular  
 10 structure.  
 11 Q. One of the first differences that Mr Radley purports to  
 12 find is "a very thin initial loop"; that's in  
 13 paragraph 273 of his report. He says:  
 14 "... there being only one other [thin initial loop]  
 15 (K3.1) in the twenty six comparison signatures showing  
 16 this to the same degree."  
 17 He considers this "obviously [a] rare occurrence".  
 18 Do you have any reaction?  
 19 A. (Mr Welch) Yes. I completely disagree, in the sense  
 20 that although it's rare, he's right, in K3, it is within  
 21 his range of variation, it's exhibited in his range of  
 22 variation.  
 23 I have an illustration to show this point, in  
 24 addition to another feature. If you go to slide 28 of  
 25 66, you can see that K3 is a narrow form. And not only

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17:26 1 do we have a similar loop size, we also have this nice  
 2 hook in the beginning stroke in both of these particular  
 3 signatures.  
 4 So this particular point that he makes, to me as  
 5 a forensic document examiner, is individualised and it's  
 6 again within his range of variation. So as far as why  
 7 he addresses it as a "rare occurrence", I don't know.  
 8 There's some significance to this particular stroke and  
 9 the beginning stroke.  
 10 Q. Mr Radley's second purported difference refers to the  
 11 length of the first loop of the stroke -- it's in  
 12 paragraph 274 -- the length of the loop of the first  
 13 stroke relative to the overall height of the structure.  
 14 He says that:  
 15 "None of the twenty six known signatures show this  
 16 proportioning."  
 17 Do you agree that that is a difference?  
 18 A. (Mr Welch) That's absolutely incorrect. I mean, if we  
 19 look at the same example, K3, I've got an illustration  
 20 to show that it is absolutely similar. It's the same  
 21 characteristic that he is saying is not in any of them.  
 22 I put an image together for this. If you look at  
 23 slide 30 of 66, you can see these dotted lines at the  
 24 top, at the bottom. The R-27 signature is what he  
 25 pointed out. We can see that the same relative loop

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17:28 1 size, overall loop size is very similar.  
 2 So again, this particular feature falls within  
 3 Mr [Struik]'s range of variation and it's consistent  
 4 with his handwriting habits. (Pause)  
 5 Q. The third purported difference noted by Mr Radley is in  
 6 paragraph 275 of his report, if I could direct your  
 7 attention to that. He says:  
 8 "The second loop of the questioned signature is  
 9 similarly thin and whilst isolated examples of a thin  
 10 second loop do appear in the known writings, the  
 11 combination of a very thin first loop and second loop  
 12 does not ..."  
 13 He references K17.3 as "probably the nearest in  
 14 comparable structures", and:  
 15 "The combined widths of the loops in the questioned  
 16 signature is slightly less than the combined width of  
 17 the loops in K17.13."  
 18 Would you agree that this is a difference between  
 19 the signature in R-27 and the known signatures of  
 20 Mr Struik?  
 21 A. (Mr Welch) No, absolutely not. It's not a difference.  
 22 Q. Could you explain why, please?  
 23 A. (Mr Welch) Yes, I can -- if you could pull up the image.  
 24 I've created an image, can you pull up an image?  
 25 Slide 31 of 66.

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17:29 1 We can see the formation of this particular stroke  
 2 in R-27, starting at the bottom, comes up, retraces  
 3 down, comes back up into that upward stroke, then comes  
 4 down, and then curves or arches back up, and retraces  
 5 down into the next element.  
 6 Q. I'm sorry, how does that demonstrate the second loop and  
 7 the thinness between --  
 8 A. (Mr Welch) Oh, I'm sorry.  
 9 Q. If you could look at Mr Radley's report, paragraph 275,  
 10 he says that the first and second loop are very narrow.  
 11 He says:  
 12 "K17.13 is probably the nearest ... The combined  
 13 width of the loops in the questioned signature is  
 14 slightly less than the combined width ... in K17.13."  
 15 Page 59 of his report. (Pause)  
 16 In the interests of time, if you want time to  
 17 consider that, maybe we could come back to that later.  
 18 A. (Mr Welch) Yes.  
 19 Q. If we could move to the fourth purported difference.  
 20 Mr Radley says:  
 21 "In the questioned signature, following the three  
 22 initial looped elements, the pen rises so as to touch  
 23 the preceding loop, descends whereupon it virtually  
 24 retraces itself before moving downwards into the next  
 25 element. Only a very [emphasised] thin loop is formed.

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17:32 1 This near retracing of the element and the subsequent  
 2 retrace of the joining loop is not seen in combination  
 3 within the twenty six known writings. A similar pen  
 4 movement is seen in K10.3 but this is not such a thin  
 5 loop to the same extent as seen in the questioned  
 6 signature."  
 7 Do you believe that that is a difference between the  
 8 signature in R-27 and the known writings?  
 9 A. (Mr Welch) It is absolutely not a difference.  
 10 Q. Could you explain?  
 11 A. (Mr Welch) It's variation. Yes, and I'm sorry, that's  
 12 the illustration here.  
 13 Q. Which is slide 31?  
 14 A. (Mr Welch) Slide 31 of 66.  
 15 Mr Radley is correct in the assessment that that  
 16 loop formation is not as wide, but it's definitely the  
 17 same movement, and absolutely is attributed to variation  
 18 and not a difference. So I completely disagree.  
 19 I mean, the examples K10.3 and 12.1 illustrate that  
 20 similar movement.  
 21 In fact, if you look at K12.1, if you look at the  
 22 relationship and where that stroke coming out of -- the  
 23 arched stroke that comes out of that initial first tall  
 24 stroke, you can see how it cuts through nearly the  
 25 middle of that loop, you see that in R-27.

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17:33 1 That's part of his handwriting habit, individual and  
 2 unique, and goes towards, again, his handwriting habit.  
 3 Q. Mr Radley continues, regarding the joining stroke from  
 4 the element just described and the curvature of it,  
 5 saying:  
 6 "... [it] descends and then bends upwards into the  
 7 following vertical element [and] has a tighter curvature  
 8 than seen in any of the twenty six known writings."  
 9 Do you agree with him that that could be  
 10 a difference?  
 11 A. (Mr Welch) No, I do not agree that it is a difference.  
 12 He is correct in the assessment that that arch is  
 13 narrower, but again it goes towards variation; it is not  
 14 a difference.  
 15 Q. Have you seen that variation in any of the known  
 16 writings of Mr Struik?  
 17 A. (Mr Welch) Not as narrow as that particular feature in  
 18 R-27. But again, it goes along with his handwriting  
 19 habits.  
 20 I've got an illustration of that. If you look at  
 21 slide 32 of 66, you see R-27, and I've highlighted just  
 22 underneath that connecting stroke going into that last  
 23 up-and-down element in red. You can see very similar in  
 24 how they cut through that loop into that last  
 25 upward-down movement. There's just slight variation in

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17:35 1 the distance, in the width of that arc or that  
 2 connecting stroke.  
 3 It definitely is not a difference which would be  
 4 suggestive or indicative of another writer.  
 5 Q. Mr Radley goes on and says that:  
 6 "The small kink that follows this downstroke ..."  
 7 This is in paragraph 279:  
 8 "... is quite pronounced and there are only two  
 9 comparison signatures that show anything near the depth  
 10 and same curvature, namely K7.3 and K14.2. This is  
 11 therefore a rare feature but not a true difference."  
 12 Could you give us your reaction to that sentence  
 13 about that being "a rare feature but not a true  
 14 difference"?  
 15 A. (Mr Welch) It's not a difference, it's absolutely within  
 16 his range of variation. I can't understand why he would  
 17 note that it's a rare feature when it's obviously  
 18 exhibited in his known handwriting samples.  
 19 If you look at -- I prepared an image in slide 34 of  
 20 66. You can see this pronounced kink similarity in  
 21 these two signatures. If you look at K7.3 and K14.2,  
 22 you can see the red arrow. And very similar in size and  
 23 distance relationship, which is also consistent with the  
 24 handwriting from Mr Struik.  
 25 Q. In his penultimate paragraph, paragraph 282, Mr Radley

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17:39 1 A. (Mr Welch) That's exactly correct: you can't, because  
 2 how many times is that characteristic going to show up  
 3 outside of the samples that you're examining? Signing  
 4 100 different documents, if you looked at 100 different  
 5 signatures, you may find that individual or that  
 6 particular feature that you find rare in the sample that  
 7 you have may express itself many times over.  
 8 Q. Another alleged difference that Mr Radley points to is  
 9 in paragraph 278, the preceding paragraph. He says:  
 10 "Following that curving joining stroke ..."  
 11 Sorry, that's going back to the stroke off of the  
 12 figure just after the large three loops:  
 13 "... a further vertical element, shown as a loop in  
 14 all of the comparison signatures, is not drawn as a loop  
 15 in the questioned signature but is a straight up/down  
 16 stroke which retrace itself to a large extent. None of  
 17 the twenty six comparison signatures show this  
 18 retracing."  
 19 That's point 6 in his [differences]. Do you agree  
 20 with him that that's a difference?  
 21 A. (Mr Welch) I don't agree that it's a difference, no.  
 22 It's not -- you don't see where he loops it or, I mean,  
 23 you don't see where he retraces it like that. But the  
 24 height relations, there's other characteristics that go  
 25 along with the handwriting habits of Mr Struik, and

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17:37 1 combines both what he sees as differences and rarities  
 2 in one analysis. He says, "All of these features may be  
 3 regarded as differences not found in the twenty six  
 4 comparison signatures or rarities rarely found", and  
 5 then criticises your report for having apparently  
 6 disregarded these.  
 7 Leaving aside the fact that you have disagreed with  
 8 differences that he has found, do you believe it is  
 9 appropriate to include rarities, as opposed to  
 10 differences, in the analysis?  
 11 A. (Mr Welch) Rarities are handwriting habits that are  
 12 found within the variation of a writer. It doesn't  
 13 matter how many times they do it; if it shows up one  
 14 time, it's within that individual's range of variation.  
 15 So the fact of the matter is in my evaluation, in my  
 16 very detailed examinations conducted, there are  
 17 substantial, significant individual handwriting  
 18 characteristics between all three of the individuals  
 19 that I've identified with their known comparison  
 20 samples.  
 21 Q. Excuse me for just a moment please. (Pause)  
 22 A more theoretical question about your profession.  
 23 You're given a certain number of known signatures. How  
 24 can you determine whether something is rare or not rare  
 25 in someone's overall writing?

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17:40 1 I don't see that as a difference.  
 2 Q. Then in paragraph 280 Mr Radley goes to another  
 3 perceived difference. He says:  
 4 "Following the anticlockwise dome of the terminal  
 5 loop, the pen then curves to the right with a fairly  
 6 lengthy curving stroke which shows a relatively angular  
 7 bend as illustrated with red arrows on the  
 8 illustration."  
 9 Which is the red arrows at point 8 in his  
 10 illustration on the top of page 59.  
 11 "However, the angularity of this stroke is, in  
 12 [Mr Radley's] opinion, significantly different than seen  
 13 in the known writings with one possible exception:  
 14 K19.18 that does show a short small angular kink."  
 15 You can read the rest of his paragraph. Do you  
 16 agree with him that this should be considered  
 17 "significantly different"?  
 18 A. (Mr Welch) No, it is not significantly different.  
 19 Q. Would you --  
 20 A. (Mr Welch) If you look at K19 -- and I've got an image  
 21 of that that I prepared: that would be slide 35 of 66 --  
 22 you can see that dome-shaped terminal movement is very  
 23 similar in its form, size and construction between R-27,  
 24 and is well within Mr Struik's range of variation.  
 25 Q. The final point of difference that Mr Radley notes,

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17:42 1 which he says is "partially related to issues previously  
 2 raised" is in paragraph 281 of his report, where he  
 3 says:  
 4 "... if one looks at the relative proportions of the  
 5 height to width of the first five elements ..."  
 6 Which he has surrounded with turquoise dotted lines  
 7 in his image on the top of page 59:  
 8 "... the questioned signature fits into a far taller  
 9 rectangle than any of the twenty six comparison  
 10 documents. This illustrates not only the fact that the  
 11 loops are narrow but also the joining strokes on the  
 12 baseline between the loops are narrower than seen in the  
 13 comparison documents."  
 14 Do you agree with his conclusion there?  
 15 A. (Mr Welch) No.  
 16 Q. Could you explain why?  
 17 A. (Mr Welch) That was paragraph 281?  
 18 Q. Yes.  
 19 A. (Mr Welch) Yes. This relative proportion that he talks  
 20 about, height and width, in the illustration that he has  
 21 in his report, you absolutely see this in one of the  
 22 handwriting signatures of Mr Struik in K14.2. I put  
 23 together an image to illustrate this: slide 37 of 66.  
 24 So we can look at the relative proportions of all  
 25 five of these elements fitting within the turquoise box

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17:44 1 in R-27 that Mr Radley speaks about. We can see the  
 2 same thing in 14.2, where these five elements fit within  
 3 that same-size box.  
 4 It absolutely goes to variation and not a difference  
 5 or suggestive of another writer.  
 6 Q. In light of the totality of what Mr Radley has  
 7 identified as purported differences, would you want to  
 8 change your opinion in any way regarding the  
 9 authenticity of Mr Struik's signature?  
 10 A. (Mr Welch) Absolutely not. I stand on my examinations  
 11 and my conclusions.  
 12 MR OSTROVE: Thank you, Mr Welch. Thank you, Mr LaPorte.  
 13 Respondent does not have any other questions at this  
 14 time.  
 15 THE PRESIDENT: Thank you.  
 16 Now we are at the end of this further step. The  
 17 next step is for the Tribunal to ask questions.  
 18 I suggest that we take a short break, but really a short  
 19 break, especially to allow the interpreters and the  
 20 court reporters to rest, because they are bearing with  
 21 us and they are ready to continue some time after 6.00,  
 22 and we are grateful to them, because it will have been  
 23 a very long day. But we will see how much time the  
 24 Tribunal questions take, and then you will give us  
 25 an estimate for your follow-up and we'll see where that

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17:45 1 brings us.  
 2 Gentlemen, you are still under the same warning not  
 3 to speak.  
 4 So let's take 10 minutes, but really 10 minutes, not  
 5 15.  
 6 (5.46 pm)  
 7 (A short break)  
 8 (5.59 pm)  
 9 Questions from THE TRIBUNAL  
 10 THE PRESIDENT: Thank you for your patience. We know it is  
 11 a long day. We still have a few questions. Obviously  
 12 most of the questions have been dealt with by counsel.  
 13 When I read your report the first time, before  
 14 reading Mr Radley's comments, it did strike me that your  
 15 conclusions with respect to the signatures -- and that's  
 16 a question for you, Mr Welch -- were relatively  
 17 assertive.  
 18 You have quoted today from your page 9 -- we could  
 19 take it there or we could take it later in your  
 20 report -- but for Lev Ran, Marc Struik and Asher Avidan,  
 21 you have concluded that these individuals wrote the  
 22 disputed signature on the relevant documents.  
 23 I have seen a number of forensic expert reports, and  
 24 I must say that I have never come across such a positive  
 25 affirmative conclusion. I always read things that are

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18:00 1 more in line with some of the terminology that we have  
 2 heard about today. And I was asking myself how come you  
 3 made these very assertive conclusions in respect of the  
 4 signatures.  
 5 A. (Mr Welch) Yes. Based upon the examinations of the  
 6 evidence, the significant fine and subtle detail that  
 7 a forger can't reproduce -- is just not able to  
 8 reproduce the speed and execution that somebody can sign  
 9 their own name, it's not possible. So with all the  
 10 subtle, individual, unique characteristics, in addition  
 11 to all the handwriting characteristics that I found in  
 12 common between the questioned signatures that  
 13 I identified and the known writings of the individuals  
 14 that I compared those signatures to, the individual  
 15 identifiable handwriting characteristics are  
 16 substantial. And there's no reservation, there's no  
 17 question in my mind that each of those individuals  
 18 signed the signatures on those particular documents.  
 19 THE PRESIDENT: In respect of the comparator documents, I'm  
 20 not certain I understand the approach. Does it matter  
 21 how many comparator documents you have?  
 22 A. (Mr Welch) It just depends upon the individual. So to  
 23 give you an example, somebody who has a very narrow  
 24 range of variation, like myself, I may be able to  
 25 resolve all the handwriting characteristics of my

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18:02 1 signature with just five samples, because my range of  
2 variation is so narrow, I'm very consistent with my  
3 signature. However, somebody who's got a very wide  
4 range of variation, I may need 30 samples to resolve all  
5 the handwriting characteristics. So it's just dependent  
6 upon each individual and the range of variation.  
7 THE PRESIDENT: So for Mr Lev Ran you had 47, if my memory  
8 serves me right.  
9 A. (Mr Welch) Correct.  
10 THE PRESIDENT: Does he have a broad range of variation,  
11 would you say?  
12 A. (Mr Welch) Yes, he has, I would say, a fairly wide --  
13 moderate, average, leaning towards the wide side of  
14 variation, yes.  
15 THE PRESIDENT: For the other two, you had significantly  
16 fewer samples; is that right? I would have to go back  
17 to where I have the notes. Yes, Struik, 25; Avidan, 14.  
18 But among the 14, there's a number that are sourced from  
19 the same signature, if I'm not mistaken, so actually it  
20 is less: there must be something like 11.  
21 Mr Avidan has quite a complex signature. We have  
22 seen a number of dissimilarities or variations. I am  
23 not saying they are fundamental or not, I'm just trying  
24 to express with my words. Is the number of comparators  
25 sufficient for you to conclude in such a positive way?

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18:04 1 A. (Mr Welch) Yes, ma'am. If it wasn't, I would have  
2 rendered a less than conclusive opinion. The evidence  
3 in the handwriting characteristics, the individual  
4 unique characteristics are, in my opinion, overwhelming.  
5 THE PRESIDENT: And that applies to Mr Struik as well,  
6 I suppose?  
7 A. (Mr Welch) Each person that I identified. If there was  
8 any question in my mind, again, I would not have  
9 positively identified them as writing the signatures.  
10 THE PRESIDENT: So you are not thinking in terms of  
11 probability, or "more likely than not" or something like  
12 that; you are giving a firm conclusion --  
13 A. (Mr Welch) That's correct, I'm giving you a firm  
14 conclusion --  
15 THE PRESIDENT: -- that this is what happened?  
16 A. (Mr Welch) -- based on our SWGDOC standards, yes.  
17 THE PRESIDENT: You reached different conclusions with  
18 respect to Lansana Tinkiano and Mamadie Touré. We have  
19 not spoken of Mamadie Touré's signature so far, and you  
20 have simply said they may have all been written by the  
21 same person. That is because you had no comparator  
22 documents; is that right?  
23 A. (Mr Welch) Yes, ma'am, that's correct.  
24 THE PRESIDENT: That signature strikes me as basic; I think  
25 you have said it.

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18:05 1 A. (Mr Welch) Correct.  
2 THE PRESIDENT: And actually relatively easy to copy, is it  
3 not? I mean, I've tried. I have to train more; it's  
4 not yet very good. But it starts here, and then you  
5 have to do something like this (indicating), and that's  
6 it.  
7 So how can you say this is all the same person?  
8 A. (Mr Welch) I said that there are indications that they  
9 may have been written by -- I did not identify them as  
10 all being written by the same person. And you're right,  
11 the limited nature of that particular signature, and the  
12 amount of writing and the simplicity of it, you know,  
13 that's correct, that's a limitation. And I took that  
14 into account when I examined and did the  
15 inter-comparisons.  
16 So just for clarification -- and I'll read the  
17 terminology according to the SWGDOC standard for  
18 indication conclusion:  
19 "... a body of writing has few features which are of  
20 significance for handwriting comparison purposes, but  
21 those features are in agreement with another body of  
22 writing ... There is evidence which indicates (or  
23 suggests) that John Doe of the known material may have  
24 written the questioned material but the evidence falls  
25 far short of that necessary to support a definite

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18:07 1 [identification]."  
2 And that's the conclusion I rendered for these  
3 particular individuals.  
4 THE PRESIDENT: For Mamadie Touré and also for  
5 Lansana Tinkiano?  
6 A. (Mr Welch) Yes, ma'am.  
7 THE PRESIDENT: Thank you. Maybe I'll give the floor to my  
8 colleagues and I'll check whether my other questions  
9 have been dealt with so far.  
10 PROFESSOR VAN DEN BERG: Mr Welch, could you please go to  
11 your report at page 113. And show it on the screen.  
12 There you see the signature of Mr Avidan.  
13 Can you put it on the screen please? (Pause)  
14 A. (Mr Welch) If I could start my computer and restart it;  
15 is that a problem?  
16 PROFESSOR VAN DEN BERG: If you look at the signature, R-28  
17 at the bottom. Do you see that?  
18 A. (Mr Welch) Yes.  
19 PROFESSOR VAN DEN BERG: And you see -- and that's the  
20 reason why I would like to have it on the screen. I'm  
21 going to show you what I mean. (Pause)  
22 If you look with me, Mr Welch -- I have to do it on  
23 this screen, although I can point to this screen, but  
24 you can't see it. Look at this. So here what strikes  
25 me: he has these dots under the signature. On the

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18:10 1 signatures on the known documents, R-28 and R-29, you  
 2 see these dots. If you go to the comparator documents  
 3 at page 116, you see that a number of those, at least to  
 4 my eye, don't have those dots.  
 5 A. (Mr Welch) Yes, so ...  
 6 PROFESSOR VAN DEN BERG: Is that a difference or  
 7 a variation, or in the range of variation, as you call  
 8 it?  
 9 A. (Mr Welch) You're talking about the four dots?  
 10 PROFESSOR VAN DEN BERG: Yes --  
 11 A. (Mr Welch) If you look at K23.3 ...  
 12 PROFESSOR VAN DEN BERG: You see the four dots.  
 13 A. (Mr Welch) ... you see the four dots. And then if you  
 14 go to 29.1 ...  
 15 PROFESSOR VAN DEN BERG: You see them there again.  
 16 A. (Mr Welch) ... you see them there. But what's  
 17 interesting, and if we zoom in ...  
 18 PROFESSOR VAN DEN BERG: Is it one of the 20 movements he  
 19 has to make? The dot is one movement?  
 20 A. (Mr Welch) Those are part of the movements, yes, that  
 21 I talked about.  
 22 PROFESSOR VAN DEN BERG: One dot is one movement?  
 23 A. (Mr Welch) One dot is one movement, correct.  
 24 PROFESSOR VAN DEN BERG: He has it here, R-28. This is  
 25 R-28, where just you got.

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18:11 1 But look at this one below -- if you can move up  
 2 a little bit the screen so we see what the number is.  
 3 It's K20.58.  
 4 A. (Mr Welch) Okay.  
 5 PROFESSOR VAN DEN BERG: It's very little, only one.  
 6 A. (Mr Welch) That's part of his variation. Sometimes he  
 7 does one, sometimes he does four.  
 8 PROFESSOR VAN DEN BERG: I see. So you don't consider that  
 9 a difference?  
 10 A. (Mr Welch) No, because we see it.  
 11 PROFESSOR VAN DEN BERG: Yes, I see what you mean. Alright.  
 12 A. (Mr Welch) We see it in the other ones that I spoke  
 13 about. In fact, if you look at K23.3, if you draw  
 14 a line from the first dot down to the second dot, that  
 15 relationship, and then if you draw a line from the  
 16 second dot up to the fourth dot, you're going to see  
 17 that move up, in the upwards direction, that's part of  
 18 his handwriting habit. That's unique, and that's what  
 19 a forger can't duplicate.  
 20 PROFESSOR VAN DEN BERG: Thank you for showing me that the  
 21 comparator documents amongst themselves have already  
 22 differences -- or, sorry, variations.  
 23 A. (Mr Welch) Variations, yes.  
 24 PROFESSOR VAN DEN BERG: Could you please go back to where  
 25 we were at page 113, and can you blow up, please, the

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18:13 1 signature of Ms Touré, also R-28. We have not discussed  
 2 very much today Ms Touré's signature; at least I didn't  
 3 hear questions from either side.  
 4 Am I correct -- but I see that I have learnt my  
 5 lesson today -- the sequence is, how she signs according  
 6 to this one, she starts here, she goes here, she ends  
 7 here, lifts up, and then puts two of these strokes here  
 8 (indicating); is that correct? Is my understanding  
 9 correct? Or is it just first she puts the two strokes  
 10 and then starts here?  
 11 A. (Mr Welch) Yes, I'm not sure about that. I could not  
 12 determine that.  
 13 PROFESSOR VAN DEN BERG: The last question I have is as well  
 14 a question I asked you, but I was stopped because it was  
 15 outside the sequence of questioning by counsel.  
 16 Could you please be shown C-0112 and C-0113. If you  
 17 go to your report, Annex L, and you go to paragraphs 12  
 18 and 13.  
 19 A. (Mr Welch) Do you have a page number?  
 20 PROFESSOR VAN DEN BERG: No, unfortunately you don't have  
 21 page numbers on this one. Paragraphs 12 and 13, and  
 22 Annex L is where you answer the questions.  
 23 A. (Mr Welch) Okay, one second.  
 24 PROFESSOR VAN DEN BERG: But we have to go further, because  
 25 these are only the questions, but now we want the

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18:14 1 answers. (Pause)  
 2 Basically you give the same answer. Do you see  
 3 that? So:  
 4 "C-0112 is a different version of R-28 ..."  
 5 That's the question. And then the question goes on:  
 6 "... which was received by BSGR and subsequently  
 7 marked 'Forged'.  
 8 "... subsequently marked 'Forged'", it says. Pause  
 9 there, and keep this in mind, because I have also  
 10 a question on that one.  
 11 "What difference do the Experts identify between the  
 12 two documents? What weight, if any, do the Experts  
 13 place on the differences which exist between C-0112 and  
 14 R-28? If the Experts do not consider the differences  
 15 (if any) to be relevant to their conclusions, please  
 16 explain why."  
 17 That's the question. Now, you answer, "We didn't  
 18 receive a document like this". I understood from you  
 19 earlier today that you haven't seen the document at all.  
 20 Or have you seen it?  
 21 A. (Mr LaPorte) That's correct: we have not.  
 22 PROFESSOR VAN DEN BERG: You have not seen it. Let me then  
 23 de-mystify you and show you the document.  
 24 Can somebody show the document on the screen? At  
 25 the same time maybe you are able to put the two

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18:16 1 together, R-28 on the left and C-0112 on the right, so  
 2 you are able to make the comparison. Or is that asking  
 3 too much? (Pause)  
 4 First of all, this is C-0112. Do you see this  
 5 "Forged"? To my layman's eye -- and please correct me  
 6 if I'm wrong -- this is a sticker, isn't it? I say this  
 7 because you see here these lines. So it's not simply  
 8 stamped on it; it's --  
 9 A. (Mr Welch) It could be stamped.  
 10 PROFESSOR VAN DEN BERG: It could be stamped? No, but  
 11 why -- if you look at these lines, you see this here.  
 12 And C-0113, if you show that one, then you can see it  
 13 even clearer, in my view. Can C-113 be shown? Alright.  
 14 You see here, again ...  
 15 Can we go to C-112, please, and can we go to the  
 16 bottom. What you see here is purportedly the signature  
 17 of Ms Touré. Note two things: it's below the name and  
 18 there's a stamp.  
 19 Now, can you compare -- do you have R-28 in front of  
 20 you?  
 21 A. (Mr LaPorte) I have R-28, yes.  
 22 PROFESSOR VAN DEN BERG: Please compare it with R-28.  
 23 A. (Mr LaPorte) Yes, there's no -- it doesn't appear to be  
 24 a stamp on R-28.  
 25 PROFESSOR VAN DEN BERG: And what else do you note? (Pause)

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18:19 1 It's a simple thing. You see here the signature in R-28  
 2 appears above the name, and here the signature purports  
 3 to be below the name, beneath the name?  
 4 A. (Mr LaPorte) Yes, that's a difference. I don't know if  
 5 it's a significant difference, but it's a difference.  
 6 PROFESSOR VAN DEN BERG: Yes. Can it be that if you look to  
 7 the stamp here and the signature, on the basis of your  
 8 visual inspection as experts, is there a difference  
 9 between the signature of Mr Avidan here and here?  
 10 A. (Mr Welch) I can't tell from here.  
 11 PROFESSOR VAN DEN BERG: If I tell you that the stamp --  
 12 okay, first let's see the signatures. Can you blow up  
 13 the signatures?  
 14 If I tell you with my layman's eye that here, you  
 15 see this thing here, below that is not under the "E",  
 16 and here it's under the "E", visually it would be  
 17 a different signature, isn't it?  
 18 Do you see this one? Here. Look at this thing  
 19 here. Under the "B", it ends, right?  
 20 MR OSTROVE: I'm sorry, Professor van den Berg, I don't  
 21 understand. When you say it's "under the 'B'", are you  
 22 talking about the "B" in "société BSG" --  
 23 PROFESSOR VAN DEN BERG: You see the signature? The top of  
 24 the signature, you see this move, and the end of it is,  
 25 if you line it up, under the "B"; but here it seems to

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18:21 1 be a different one on the top, which ends under the "E".  
 2 A. (Mr Welch) Can you enlarge it a little bit larger?  
 3 PROFESSOR VAN DEN BERG: So I'm talking about this. Look at  
 4 this area and compare it with this area (indicating).  
 5 A. (Mr Welch) Yes, I mean, you can tell the signature --  
 6 you know, there's differences between the two  
 7 signatures.  
 8 PROFESSOR VAN DEN BERG: Yes, right. And then we stay here,  
 9 and if you look to the stamp, look to the "ASHER", and  
 10 the "R" ends in the "B", and here the "R" and the "B" is  
 11 slightly in a different spot. This is only a visual  
 12 inspection by a layperson.  
 13 A. (Mr Welch) Sure.  
 14 PROFESSOR VAN DEN BERG: So what would be your conclusion if  
 15 you see these two documents or compare these two  
 16 documents?  
 17 A. (Mr Welch) Well, the one thing that I would want to do  
 18 is I would want to overlay these documents and take  
 19 a look at them and see what in fact is different and if  
 20 there is anything that is in fact similar. Is there  
 21 evidence of a cut-and-paste of the signature into that  
 22 area?  
 23 PROFESSOR VAN DEN BERG: I have to tell you one thing.  
 24 Can you make it a bit smaller, the thing come back  
 25 to normal? Right, okay.

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18:22 1 Here you see "Fait en double exemplaire": it means  
 2 "Made in twofold". So there may actually be two  
 3 versions of the same document. That may be one of the  
 4 reasons.  
 5 Can we take it any further than this, on the basis  
 6 of your visual inspection?  
 7 A. (Mr Welch) No. We would need to do a physical  
 8 examination, have time to evaluate this.  
 9 PROFESSOR VAN DEN BERG: Would it be possible that do you  
 10 see that tonight, but on the basis that you have limited  
 11 resources with you, and report back to us tomorrow?  
 12 A. (Mr Welch) Is that what the Tribunal wants us to do?  
 13 PROFESSOR VAN DEN BERG: How far can you get, as an expert?  
 14 A. (Mr Welch) I don't know. It could take quite a lot of  
 15 time; it could take more than the time that we have for  
 16 this hearing.  
 17 PROFESSOR VAN DEN BERG: Right. It is not really necessary,  
 18 but it was simply a question of why these documents are  
 19 in the record. Questions were asked by the Claimants  
 20 about this document.  
 21 A. (Mr Welch) Did they have Mr Radley examine that?  
 22 PROFESSOR VAN DEN BERG: Ah, you want to serve it over the  
 23 fence!  
 24 A. (Mr Welch) I said, "Did they have Mr Radley examine  
 25 that?"

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18:24 1 PROFESSOR VAN DEN BERG: I know. What I suggest is you have  
 2 a look and see how far you get tonight. But it's not  
 3 an essential question.  
 4 PROFESSOR MAYER: I would like to come back to this position  
 5 that you can say that this has been signed by the person  
 6 who is supposed to have signed it.  
 7 For instance, a complex signature like Mr Avidan's,  
 8 very complex, many strokes, there are many comparatives,  
 9 with a big range -- it seems to me that the range is  
 10 rather big -- and it falls within the range.  
 11 Now, to be able to say that it's Mr Avidan who has  
 12 signed this, I suppose that it's based on the fact that,  
 13 first, it's very complex; second, it's fluid and it  
 14 doesn't tremble; and maybe other -- and I'd like to know  
 15 more about that. Because the result, the conclusion,  
 16 the positive conclusion is surprising to a layman  
 17 because you would think, if you are not an expert, that  
 18 a genius can imitate any signature.  
 19 So in fact, more precisely, what allows you to say  
 20 really it is humanly impossible that someone else made  
 21 that signature? Is it based only on your experience, or  
 22 are there studies? Can you elaborate?  
 23 A. (Mr Welch) Sure.  
 24 Yes, it's based on my 3 years of training and my  
 25 over 25 years of experience in law enforcement with the

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18:26 1 Michigan State Police doing handwriting examinations,  
 2 thousands of comparisons, inter-comparisons. And based  
 3 upon my testimony and everything that I've shown you  
 4 today, there's no question in my mind that all of those  
 5 signatures have the complexity, they have the  
 6 individual, unique and subtle handwriting habits, in my  
 7 opinion, that a forger could not duplicate.  
 8 PROFESSOR MAYER: Okay. So based on your vast experience?  
 9 A. (Mr Welch) That's correct.  
 10 PROFESSOR MAYER: Thank you.  
 11 THE PRESIDENT: Just following up on this point.  
 12 Is it sufficient, but not necessary, to find the  
 13 same variation at least once in a comparator document?  
 14 Do you need to find the variation in a comparator  
 15 document or not?  
 16 A. (Mr Welch) No, you can have an absent character,  
 17 absolutely, and the signature be identified. It goes to  
 18 the substantial number and significance of the  
 19 individual, unique handwriting habits. Again, a forger  
 20 can get the basic form down, but they can't get the  
 21 intricate, slight pen movements, the little fine and  
 22 subtle details. They can't do that.  
 23 THE PRESIDENT: I see two aspects, but you will correct me  
 24 if I misunderstand you. On the one hand there's  
 25 a question of "Is there distortion or slow writing?";

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18:28 1 and on the other there's something else, the  
 2 similarities that you may find, but that you then  
 3 consider as not fundamental and therefore within the  
 4 range of variations.  
 5 Are these two different aspects or is it all the  
 6 same? What is the weight of one or the other when you  
 7 reach your conclusions?  
 8 A. (Mr Welch) Yes, that's -- you have to properly reason  
 9 and evaluate what is significant in the known writing  
 10 and what is significant in the questioned writing, and  
 11 you have to evaluate that significance in combination,  
 12 together.  
 13 Again, individuals are not machines, right? We just  
 14 don't write exactly the same way every single time. But  
 15 every person is going to have that fine and subtle  
 16 detail in their writing that's going to reveal itself as  
 17 either being genuine or characteristics of a forgery.  
 18 THE PRESIDENT: Yes. And if I'm very tired or I'm ill, and  
 19 I sign with some difficulty, you would still recognise  
 20 that this is my signature; it would not look like  
 21 a forger's signature?  
 22 A. (Mr Welch) Great question. I mean, there may be things,  
 23 there can be outside factors that influence our writing  
 24 where we may not be able to resolve, if you're ill or  
 25 you're on medication or you have a broken arm or some

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18:30 1 type of medical condition, Parkinson's, something like  
 2 that, where you may not be able to positively identify  
 3 that individual.  
 4 THE PRESIDENT: There were a few more things, but not many,  
 5 I can reassure you.  
 6 You have chosen this terminology -- and now it is  
 7 for Mr LaPorte, because it goes to the document of  
 8 authenticity -- "no evidence", and you have explained  
 9 why you say "no evidence of fraud".  
 10 Mr Radley has criticised this extensively. He has,  
 11 in particular, said that it is unclear why you have  
 12 chosen this terminology because it is not used in the  
 13 SWGDOC standard.  
 14 Is that correct, that it is not the terminology of  
 15 the standard?  
 16 A. (Mr LaPorte) So I was -- actually I've been part of  
 17 the -- I was part of the writing for the SWGDOC  
 18 standard, and we're working on a new standard. So  
 19 I know I can't get too far ahead of that.  
 20 But there's been a lot of discussion on -- the  
 21 language in the SWGDOC standard was primarily developed  
 22 for handwriting. And if you notice, I think it's  
 23 section 3.7 or something in there, 3-point-something in  
 24 the SWGDOC standard, that just says, "Oh, and this can  
 25 be applied to other examinations". So it's almost like

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18:32 1 it was an afterthought.  
 2 Now, the examination that we did with respect to  
 3 document authentication is far more comprehensive. So  
 4 it's a completely different type of examination.  
 5 So in my view the SWGDOC standard in its current  
 6 status doesn't necessarily work for this type of  
 7 examination. I have used the conclusionary language in  
 8 the SWGDOC standard for other examinations, and I would  
 9 say most of the time I use that terminology.  
 10 In this particular case though, because we can't  
 11 prove something is authentic or genuine, it's very  
 12 difficult to do, it almost voids out the scale that we  
 13 use. Because the scale says that you can say  
 14 "Absolutely yes" or "Absolutely no", and then there's  
 15 kind of this in between.  
 16 But really the evidence is actually -- it's much  
 17 easier to prove fraud than it is to prove genuineness.  
 18 It's way more easier to prove that a document is  
 19 fraudulent than it is to prove that it's truly genuine.  
 20 So the scale is almost already tilted in the fraudulent  
 21 direction, if you will, because all we need in an exam  
 22 is to show one thing, whether it's a watermark that  
 23 wasn't available, whatever that is, just one test, and  
 24 you show something is fraudulent.  
 25 So the language that we've used in this case is

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18:33 1 actually used quite extensively, because the SWGDOC  
 2 standard just doesn't really encompass this. Now,  
 3 hopefully in years to come, maybe in the next one year  
 4 or, you know, next year and a half, the standard now has  
 5 kind of developed that language to address these kinds  
 6 of issues.  
 7 THE PRESIDENT: Mr Radley has suggested some terminology, if  
 8 you look at paragraph 51 of his report to paragraph 54  
 9 on page 12. Do you have his report there? (Pause)  
 10 That's when he discusses the alternative  
 11 possibilities. But he speaks of "the evidence  
 12 conclusively demonstrates", "there is very strong  
 13 evidence", "strong evidence", "moderate evidence".  
 14 A. (Mr LaPorte) Yes, so once again this goes back to what  
 15 I was saying: you could never say that it conclusively  
 16 demonstrates genuineness. So that's why this kind of  
 17 scale doesn't work: what it does is it starts to bias  
 18 the scale.  
 19 If we are going to use a symmetrical scale that's  
 20 equal on all sides, then we have to have an equal -- and  
 21 I'll use Mr Radley's language: we have to kind of have  
 22 an equal likelihood to prove both propositions.  
 23 THE PRESIDENT: Then we come back to the discussion on  
 24 likelihood that we had earlier today.  
 25 A. (Mr LaPorte) Correct. And you can't prove genuineness.

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18:35 1 I shouldn't say "can't", but it's very, very, very  
 2 difficult.  
 3 The only time in my experience when we have  
 4 determined whether documents are genuine or  
 5 counterfeit -- and I've actually written a chapter on  
 6 this in a textbook -- is we can do this for authorised  
 7 documents, like government-issued documents, like money,  
 8 like currency, drivers' licences, passports. And the  
 9 reason we can do that is because we know what a genuine  
 10 should have, all the security features of it, and if it  
 11 doesn't have those security features, then we can say  
 12 that it's fraudulent. So that's really the only type of  
 13 exam where you can truly say something is genuine or  
 14 authentic.  
 15 PROFESSOR MAYER: If I understand correctly, the situation  
 16 is different for the two experts. I mean, when it's  
 17 chemical or physical, either you find that there's fraud  
 18 or you don't know, because you have not found it, but  
 19 you don't know the truth.  
 20 I understand that it's completely different for  
 21 signatures: because you can compare things, it's  
 22 a completely different exercise?  
 23 A. (Mr LaPorte) Yes.  
 24 PROFESSOR MAYER: Am I right?  
 25 A. (Mr LaPorte) Absolutely. So I'm a chemist. When we're

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18:37 1 talking about chemistry, it's very easy for me to prove  
 2 things that are conclusively true or conclusively wrong  
 3 or not true. So, yes, that's a difference.  
 4 I think, with all due respect to Mr Radley, I don't  
 5 believe that we have a significant difference. So  
 6 Mr Radley has stated that while he -- I think while the  
 7 documents may not have evidence, it doesn't mean they  
 8 are genuine. I don't disagree with that. I don't  
 9 disagree with that philosophy. But I don't put it in  
 10 an equal likelihood in this particular case, based on  
 11 the fact that we've done so many examinations on so many  
 12 documents.  
 13 We talk about this whole master forger theory. We  
 14 would have to have a master forger who would have to do  
 15 all of these signatures, and then that master forger has  
 16 to exhibit the same variation for each signature that  
 17 Mr Welch has found in the knowns. It almost sounds like  
 18 a theory that just doesn't work out, and can never work  
 19 out.  
 20 I mean, I can't imagine -- and I worked for the  
 21 Secret Service, and I used to work intelligence cases,  
 22 I worked in the intelligence community for years, and we  
 23 had really good forgers, I worked with really good  
 24 forgers. But I could not imagine a forger doing this  
 25 kind of thing over and over for multiple signatures,

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18:38 1 using different pens, doing it on different documents  
2 with different paper, not stacking them on top of each  
3 other, using different printing processes.  
4 What we've been saying throughout our report is when  
5 you look at the cumulative value of the entire report,  
6 it makes these things much less likely, if you will.  
7 THE PRESIDENT: Thank you.  
8 Mr Welch, you would have no difficulty using one of  
9 the terms that Mr Radley proposes in these paragraphs 51  
10 to 54. Which one would you use?  
11 A. (Mr Welch) "The evidence conclusively demonstrates".  
12 PROFESSOR VAN DEN BERG: That is the equivalent to your  
13 conclusion with respect to the three signatures of  
14 Lev Ran, Avidan and Struik?  
15 A. (Mr Welch) If that's the strongest. Again, we don't use  
16 this scale.  
17 THE PRESIDENT: No, I know --  
18 A. (Mr Welch) But if that's the strongest, "the evidence  
19 conclusively demonstrates" would be what I would use,  
20 correct.  
21 THE PRESIDENT: What would you use for Mamadie Touré and  
22 Lansana Tinkiano?  
23 A. "There is moderate evidence to support".  
24 THE PRESIDENT: To support what?  
25 A. (Mr Welch) The indication that the same individual may

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18:40 1 have signed or wrote those --  
2 THE PRESIDENT: The proposition that the same individual has  
3 signed, not these individuals?  
4 A. (Mr Welch) Correct.  
5 THE PRESIDENT: Fine.  
6 There's another smaller point, but I'd like to cover  
7 it. In paragraph 134 of Mr Radley's comments there is  
8 this discussion -- and that's a question for you,  
9 Mr LaPorte. Maybe you read the entire paragraph. But  
10 the question that is being asked is: why were R-24 and  
11 R-28 together at one point in time, which seems to be  
12 your explanation, when they are dated two years apart,  
13 between two different parties, and they are different  
14 types of documents?  
15 A. (Mr LaPorte) Is that the one with the impressions?  
16 THE PRESIDENT: Yes, I think it is. It refers to your  
17 paragraph 176. If you go back to your report,  
18 paragraph 176 would be page 119. (Pause)  
19 A. (Mr LaPorte) Mr Welch worked on this part of the  
20 examination.  
21 A. (Mr Welch) Yes. And your question?  
22 THE PRESIDENT: My question is: what do you say to the  
23 criticism of Mr Radley, who says that these documents  
24 are two years apart and between different parties, so  
25 how could they have been together at some point?

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18:42 1 A. (Mr Welch) I know that Mr LaPorte testified to this  
2 earlier today, but it's not uncommon when you are  
3 dealing with different documents to pull them from  
4 a file to look at or review for supportive purposes. So  
5 that could have happened in this particular case.  
6 THE PRESIDENT: So this was the explanation that we heard  
7 already.  
8 A. (Mr LaPorte) They could have been stored together.  
9 THE PRESIDENT: You already said that.  
10 A. (Mr Welch) Or copies of them.  
11 A. (Mr LaPorte) That's the other thing: we don't know that  
12 it came directly from that document. It was the same  
13 text. So there may have been another copy of that  
14 document too.  
15 THE PRESIDENT: Mr Radley also insists on the fact that the  
16 dates of production of the documents cannot be  
17 established. And I was wondering whether there are  
18 techniques -- other than the ink-dating, which here  
19 doesn't apply because of the age of the document -- to  
20 determine the age of a document; and, if so, did you use  
21 these techniques?  
22 A. (Mr LaPorte) That's an excellent question, and I do  
23 agree with Mr Radley: we can't establish the date of  
24 when they were actually printed. But other than doing  
25 the ink-dating testing that we had talked about early

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18:44 1 on, that would mean that the document would have had to  
2 be less than two years old. So we know that --  
3 I believe the FBI took possession of them in 2013, is my  
4 understanding. So they fell out of the range to do  
5 a specific ink-dating test.  
6 The only other way -- and once again we talked about  
7 this before -- was these counterfeit protection security  
8 codes that they put in some printers, or some photocopy  
9 machines, when you could determine the date that that  
10 document came off of the machine. But other than that,  
11 I can't think of a way to establish with 100% certainty  
12 when they were actually executed.  
13 THE PRESIDENT: Fine. I have no further questions. There  
14 are no questions from my colleagues either. So now we  
15 would go over to the follow-up questions of the parties,  
16 if you have any, and these are questions arising out of  
17 the questions asked by the Tribunal.  
18 MR DAELE: Not by counsel for Guinea?  
19 THE PRESIDENT: Let me think about that. We are not in  
20 a cross-examination/re-direct logic. Do you have many  
21 of those? I said earlier it was follow-up questions on  
22 the Tribunal's questions, because that's how we framed  
23 the examination.  
24 MR DAELE: The questions relate to explanations that the  
25 expert gave in response to questions by counsel for

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18:45 1 Guinea, who took the Tribunal, for example, to all these  
 2 slides that are now part of the record. So I do have  
 3 a number of questions arising out of the examination  
 4 both by you -- I mean, some of those questions were  
 5 asked by the Tribunal; some of the questions were raised  
 6 by Mr Ostrove.  
 7 THE PRESIDENT: We will of course hear the parties' experts  
 8 tomorrow, and we will hear Mr Radley in particular on  
 9 these issues.  
 10 What follow-up questions does the Respondent have?  
 11 MR OSTROVE: Personally I am considering maybe two follow-up  
 12 questions on the Tribunal's points. They could lead to  
 13 further questions about really the nature of this  
 14 exercise, so it could take a few minutes.  
 15 THE PRESIDENT: Do you have a time assessment?  
 16 MR DAELE: It depends how prompt the answers come, but ...  
 17 THE PRESIDENT: At this time of the day, it becomes  
 18 important.  
 19 MR DAELE: For me, probably 15 minutes.  
 20 MR LIBSON: I have 5 minutes.  
 21 (The members of the Tribunal confer)  
 22 THE PRESIDENT: We will let you ask questions also that  
 23 arise out of the questions from Respondent's counsel,  
 24 and especially in respect of the slides that are now  
 25 newly in the record.

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18:48 1 At the same time, I must say that it's 6.50. We  
 2 have interpreters and court reporters -- we have no  
 3 problem, we can stay here for very long and we are at  
 4 your disposal, but we have other people who are  
 5 supporting us who already have had a very long day and  
 6 it may start being difficult for them to follow  
 7 everything. So out of respect for them, we should try  
 8 and keep it as short as it can be. But then I am not  
 9 limiting you if you think you have questions that you  
 10 need to ask now.  
 11 MR LIBSON: Thank you. I am going to ask some questions  
 12 that arise out of the Tribunal's questions.  
 13 (6.49 pm)  
 14 Further examination on behalf of Claimants  
 15 Q. You were asked about being able to show whether  
 16 a document is genuine, and you said that's very  
 17 difficult. We established that earlier today. And at  
 18 one point in your answers this afternoon, you said: one  
 19 test, and you can show something is fraudulent.  
 20 I thought that you and I had established this  
 21 morning that one test and you can establish that  
 22 something is altered, rather than fraudulent?  
 23 A. (Mr LaPorte) Correct. So "alteration" is the word that  
 24 I should be using. But certainly if you do  
 25 an indentation examination and you have an earlier-dated

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18:50 1 document on a later-dated document, somebody created  
 2 that document at a later date or they backdated it.  
 3 I wouldn't use the term "fraudulent" in my report.  
 4 Q. You did though, and you keep on slipping into that term.  
 5 A. (Mr LaPorte) No, actually we have never determined that  
 6 anything is fraudulent. We've said that there is no  
 7 evidence to indicate fraudulence. So we're using that  
 8 in a different -- in my report, if we did find that kind  
 9 of evidence, we would not have said that it was  
 10 fraudulent; we would have said that it was altered.  
 11 Q. So it was wrong to say, "One test and you can show  
 12 something is fraudulent"? You should have said, "One  
 13 test and you can show it's altered"?  
 14 A. (Mr LaPorte) I'll be careful on that, because there may  
 15 be a test that shows that something is truly --  
 16 Q. There may be. I understand that. I understand.  
 17 A. (Mr LaPorte) It's been backdated; I don't know why it's  
 18 been backdated, I guess.  
 19 Q. Then you also said that a master forger would have to do  
 20 all of the signatures that we've been examining on the  
 21 record for the signatures to be -- they all have to come  
 22 together; in other words, all three of the signatures  
 23 that we've been talking about would have to be performed  
 24 by a master forger?  
 25 A. (Mr LaPorte) And they would have had to create those

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18:51 1 documents without leaving any evidence of alterations.  
 2 Q. Why would one person --  
 3 A. (Mr LaPorte) So it's all of that together.  
 4 Q. Sorry. Why would there have to be one person who  
 5 created all of the documents?  
 6 A. (Mr LaPorte) I guess you could get three master forgers,  
 7 I don't know.  
 8 Q. Why do all the documents have to be forged?  
 9 A. (Mr LaPorte) Well, I'm not saying -- I'm saying: if they  
 10 were forged, or all of them were forged or ... Anyway,  
 11 our conclusion is based on looking at all of the  
 12 evidence as a whole. We didn't find anything with  
 13 respect to any individual document.  
 14 Q. You were asked to look at each of the documents  
 15 separately, and you have no idea which of the documents  
 16 is said to be a forgery?  
 17 A. (Mr LaPorte) I have no idea what the importance of those  
 18 documents is, individually or together.  
 19 Q. So what's the relevance of saying that a master forger  
 20 would have to have done all of the signatures for this  
 21 Tribunal, in them determining the issues that are before  
 22 them?  
 23 A. (Mr LaPorte) No, what I'm saying is there were a whole  
 24 bunch of things that would have had to work out, right?  
 25 They would have had to create the document --

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18:52 1 Q. From where do you get that? In relation to each  
2 individual document. You are talking about all of the  
3 documents in question.  
4 A. (Mr LaPorte) I was talking as a whole.  
5 Q. But where do you get that from?  
6 A. (Mr LaPorte) I was saying that if a document is  
7 fraudulent and somebody forges it --  
8 Q. But why do all of the documents have to be fraudulent.  
9 A. (Mr LaPorte) I was saying as a whole.  
10 Q. They don't, thank you.  
11 This is as much for the Tribunal as it is for  
12 Mr LaPorte. The documents that Professor van den Berg  
13 has put on the screen were in fact available in the  
14 universe of documents that were available to you.  
15 I don't say that you've seen them, because I understand  
16 you haven't. But on 18th September the parties were  
17 invited to identify the documents on the record  
18 containing the signatures in question, and actually  
19 Guinea identified these document as being on the record.  
20 Then under paragraph 9 of the terms of reference,  
21 you had access to the best available copies of all of  
22 the documents. I'm not saying that you've seen the  
23 documents, but that is the regime that was --  
24 MR OSTROVE: I'm sorry, it seems like we're going into  
25 pleading rather than questioning. Is there a question

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18:55 1 A. I do.  
2 Q. Is the top diagram supposed to be a reproduction of what  
3 Mr Radley had produced?  
4 A. (Mr Welch) That's correct, yes.  
5 Q. Okay. Can I ask you to keep that open -- could we have  
6 that on screen? -- and also have open Mr Radley's report  
7 at page 59.  
8 To my eye, this is not a reproduction of this  
9 diagram. If I can explain that -- sorry.  
10 A. (Mr LaPorte) We can't get it from his computer ...  
11 (Pause)  
12 MR OSTROVE: While we're going there, if the point being  
13 made is that it's not a photocopy but rather  
14 a reconstruction, we would certainly concede the point  
15 that it's a new demonstrative, not a copy.  
16 MR LIBSON: Mr Ostrove, how can you concede the point? It's  
17 not your demonstrative.  
18 MR OSTROVE: I'm looking at it, and it's obviously not.  
19 MR LIBSON: I'm asking the questions of Mr Welch, thank you.  
20 Mr Welch said it was a reproduction.  
21 MR OSTROVE: And I would say it is a reproduction, yes.  
22 MR LIBSON: So it's not a copy; you have reproduced it  
23 yourself?  
24 A. (Mr Welch) That is correct.  
25 Q. And it's not the same, is it?

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18:53 1 about what the --  
2 MR LIBSON: It goes to questions that Mr Daele was asking  
3 before, but also to Professor van den Berg's questions,  
4 which is that these weren't hidden from anyone; they  
5 were available.  
6 But you don't recall seeing them at all?  
7 A. (Mr LaPorte) All I can say is I've never seen them. So  
8 they may have been made available, but we've never seen  
9 them. They weren't turned over to us.  
10 PROFESSOR VAN DEN BERG: Mr Libson, on those two documents,  
11 it struck me, because I had noticed that earlier, your  
12 question 12 says that your client received them, and  
13 subsequently was added the word "Forged".  
14 MR LIBSON: Yes, they did.  
15 PROFESSOR VAN DEN BERG: Right. So the word "Forged", the  
16 provenance is from the Claimants' side?  
17 MR LIBSON: Exactly. Well, it goes to the factual pleading,  
18 and we'll come to that.  
19 My last question to Mr Welch. At slide 37 that you  
20 produced today, responding to page 59 of Mr Radley's  
21 report --  
22 A. (Mr Welch) Slide what number, I'm sorry?  
23 Q. 37.  
24 A. (Mr Welch) Yes.  
25 Q. Have you got that in front of you?

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18:58 1 A. (Mr Welch) Hold on, let me see. (Pause)  
2 Q. Shall we just look at one thing? I haven't looked at  
3 this closely, but if you would just look at one thing.  
4 In the rectangle, the right-hand line that goes up  
5 on the right, goes just to the right, it touches the "U"  
6 in "Resources" in Mr Radley's report, and in your slide  
7 it goes almost to the -- sorry, in Mr Radley's report  
8 it's on the left of the "U", and in your reproduction  
9 it's on the right of the "U", for example.  
10 A. (Mr Welch) Yes, that's correct.  
11 Q. So it's not the same?  
12 A. (Mr Welch) No. I did my best to overlay them in some  
13 imaging shot or software, to make sure it was absolutely  
14 the same size, and just the slight placement of it  
15 obviously is just a little bit off, correct.  
16 Q. Well, it's quite a lot off, isn't it? Isn't the point  
17 of these things precision?  
18 A. (Mr Welch) The point of this is: this same -- this blue  
19 turquoise box and this red turquoise box are the exact  
20 same size in my display, and you can see that the  
21 handwriting characteristics of the first five elements  
22 fit within that or very closely to that, to the  
23 questioned signature and to the known signature. So  
24 it's relative. It's relative. And that's going off  
25 Mr Radley's description.

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19:00 1 Q. But it's not a reproduction of Mr Radley's material, is  
 2 it? It's not a good reproduction?  
 3 A. (Mr Welch) I think it's pretty close.  
 4 Q. And it's not Mr Radley's description either, is it?  
 5 Where is it in Mr Radley's description?  
 6 A. (Mr Welch) Paragraph 281:  
 7 "As a general point and one which is particularly  
 8 related to issues previously raised, if one looks at the  
 9 relative proportions of the height to width of the first  
 10 five elements (as illustrated with the dotted turquoise  
 11 lines) ..."  
 12 Q. Yes, as illustrated in his material, not in your box  
 13 here?  
 14 A. (Mr Welch) That's correct. I created an illustration to  
 15 illustrate what Mr Radley was saying from the documents  
 16 in the annex, and you can clearly see that those five  
 17 characters fit in that same amount of space relationally  
 18 and proportionally.  
 19 MR LIBSON: Okay, thank you.  
 20 MR DAELE: Thank you. Can we go to your slide 9, please.  
 21 We discussed for a while about the movement. I think  
 22 you said that this was a new image.  
 23 A. (Mr Welch) I'm sorry, what kind of image?  
 24 Q. This is a new image that you created for this  
 25 presentation?

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19:02 1 A. (Mr Welch) Correct.  
 2 Q. So this image was not in your final report?  
 3 A. (Mr Welch) It was not in my final report, no.  
 4 Q. These flèches at the 9 and the 7 and the 3 and the 8 and  
 5 so forth, indicating the movement, was that work in your  
 6 final report?  
 7 A. (Mr Welch) It was part of my observations, absolutely,  
 8 in the preparation of the final report.  
 9 Q. So can you show us in the final report where we will  
 10 find this?  
 11 A. (Mr Welch) No, I did not put this illustration together  
 12 in the report.  
 13 Q. And the work with the flèches, again the movement, where  
 14 do we find in your final report your analysis of the  
 15 movement?  
 16 A. (Mr Welch) It was part of my consideration in the  
 17 examinations. There are a lot of things that  
 18 I considered --  
 19 Q. Can you show us? Because under paragraph 19 again of  
 20 the PO17 it was explicitly indicated that it should not  
 21 contain information not in the record. So I'm asking  
 22 for this -- and please don't interrupt.  
 23 MR OSTROVE: Please don't argue with the witness.  
 24 MR DAELE: Where on the record will we find the information  
 25 that these flèches and the numbers indicate?

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19:03 1 A. (Mr Welch) You will not find this image with the arrows  
 2 and numbers in my report.  
 3 Q. Where will we find other analysis of the movement of the  
 4 signature at R-24?  
 5 A. (Mr Welch) Will we find what?  
 6 Q. An analysis of the movement of R-24?  
 7 A. (Mr Welch) In the report?  
 8 Q. Yes, a narrative analysis of the movement of R-24.  
 9 A. (Mr Welch) You won't find an illustration, but it was in  
 10 fact part of my examination --  
 11 Q. Where will we find narrative?  
 12 A. (Mr Welch) -- my examination process. You're not going  
 13 to find a narrative in the report, no.  
 14 Q. So there's no information in the [final] report on the  
 15 movement of the signature?  
 16 A. (Mr Welch) I'm sorry, maybe I'm misunderstanding. Are  
 17 you asking me if I analysed the movement?  
 18 Q. I asked you: where in the record do we find the  
 19 information on which this image is based, so the  
 20 movement? In your final report, where do we find on the  
 21 record information in relation to the movement of this  
 22 particular signature?  
 23 A. (Mr Welch) You won't find the textual information spelt  
 24 out in my report, but it absolutely was part of my  
 25 examination process. And in that regard, in my opinion,

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19:05 1 it's part of the report. And this particular image is  
 2 from the annexes.  
 3 Q. Is it part of the record?  
 4 THE PRESIDENT: I think, Mr Daele, you got the answers to  
 5 the questions. It is then for later if you wish to  
 6 argue that it was not in the record; that's a different  
 7 question. These gentlemen do not know everything that  
 8 is in the record. They have told you what they have  
 9 done.  
 10 MR DAELE: Can you tell us when this was done, when you  
 11 analysed the movement?  
 12 A. (Mr Welch) Oh, I analysed the movement as soon as  
 13 I looked at the signature.  
 14 Q. So why is it then not in your final report?  
 15 A. (Mr Welch) Again, I didn't -- every single minutia of  
 16 detail is not in that report. In fact, that's probably  
 17 the most exhaustive report insofar as information that's  
 18 provided. This particular information didn't --  
 19 Q. Can you explain: it was not important enough to put in  
 20 your final report, but it's important enough to put in  
 21 a presentation to the Tribunal?  
 22 A. (Mr Welch) Okay, great question, fair question.  
 23 The Tribunal -- we're here today to communicate to  
 24 them and show them clearly the substantial significance  
 25 of the evidence. In that particular case, I put this

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19:06 1 illustration together to show so that they can see the  
 2 movement, the creation of the signature, the evidence  
 3 that supports it, along with the fine detail in each one  
 4 of these signatures for the individuals that I've  
 5 identified.  
 6 So for the purposes of clarifying and presenting  
 7 this before this honourable Tribunal today, I wanted to  
 8 make sure that they were clear and understood  
 9 everything.  
 10 Q. If we go to paragraph 88 of the final report, where you  
 11 analyse the signature, you talk about:  
 12 "... the characteristics observed include height  
 13 relations, proportions, spacial relations, hooks,  
 14 tapered strokes, and retraces."  
 15 (Pause to locate the document)  
 16 You do not talk about movement; is that correct?  
 17 A. (Mr Welch) It's absolutely part of my examination  
 18 process, is the movement.  
 19 Q. But you've not included it in your final report. Okay.  
 20 A. (Mr Welch) That's not true.  
 21 Q. Can you show it to me?  
 22 A. (Mr Welch) Every aspect of this relates to the movement:  
 23 the height relations, the proportions, the spacial  
 24 relations, the hooks, the tapered strokes, the retraces.  
 25 I've gone over that today.

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19:08 1 Q. Yes, we spent ten minutes to analyse the movement of the  
 2 signature. Where do we find this in your report? Why  
 3 are you sure that 1 is 1 and 3 is 3?  
 4 THE PRESIDENT: I'm sorry, the expert has just answered that  
 5 height relations, proportions, spacial relations, hooks,  
 6 tapered strokes and retraces all are dealing with  
 7 movement. You may disagree with that, but that is the  
 8 answer which I have noted down.  
 9 MR DAELE: Your slide here talks about "formation of  
 10 signature". Where do we find your analysis of  
 11 formation?  
 12 A. (Mr Welch) I just expressed that in my last response.  
 13 PROFESSOR VAN DEN BERG: May I ask the question differently,  
 14 Mr Daele, if you allow me?  
 15 MR DAELE: Of course.  
 16 PROFESSOR VAN DEN BERG: This is slide 9 you see on the  
 17 screen, on which Mr Daele is asking you questions.  
 18 A. (Mr Welch) Correct.  
 19 PROFESSOR VAN DEN BERG: In response to what did you prepare  
 20 this slide?  
 21 A. (Mr Welch) In preparation for this hearing.  
 22 PROFESSOR VAN DEN BERG: Yes, but was it in response to the  
 23 Radley report?  
 24 A. (Mr Welch) No.  
 25 PROFESSOR VAN DEN BERG: To something that you read?

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19:09 1 A. (Mr Welch) No.  
 2 PROFESSOR VAN DEN BERG: Because I understand your answer to  
 3 paragraph 88 of your report, that you have the various  
 4 elements for it. But what you don't see is the  
 5 sequencing of the formation, so where you start with 1  
 6 and you end up with 8 -- or 9, actually. So what was  
 7 the reason that you then put it forward here in that  
 8 way, which we indeed do not see in paragraph 88?  
 9 A. (Mr Welch) Because I wanted to make sure that the  
 10 Tribunal clearly understood the significance of the  
 11 formation of these particular signatures, along with the  
 12 detail that it provides.  
 13 PROFESSOR VAN DEN BERG: Okay, thank you.  
 14 MR DAELE: Can we go to slide 16, please. This is a slide  
 15 in which you analyse, if I'm correct, the length of the  
 16 vertical strokes?  
 17 A. (Mr Welch) Correct, the proportion.  
 18 Q. Was that work that's included in the final report?  
 19 A. (Mr Welch) That was work that was conducted during the  
 20 course of my examinations.  
 21 Q. Is it in the final report?  
 22 A. (Mr Welch) Yes, in the conclusions. It's based and  
 23 embedded in the conclusions.  
 24 Q. Can you show me where we find it in the final report?  
 25 A. (Mr Welch) You're not going to find that wording in the

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19:11 1 report.  
 2 Q. We're not going to find that wording and we're not going  
 3 to find that image. The red lines, the work that you  
 4 have done here, we're not going to find it in the final  
 5 report.  
 6 MR OSTROVE: Excuse me, Madam President. I have to say,  
 7 first of all, Mr Daele had an opportunity at the  
 8 beginning to object to -- and he started off by asking  
 9 about aspects of the report that he considered were not  
 10 on the record and were therefore a violation, under his  
 11 interpretation, of paragraphs 19 and 20 of the  
 12 [procedural order]. We questioned Mr Welch, and he  
 13 introduced these slides into the record.  
 14 But now Mr Daele is going back on a different point.  
 15 He's not asking follow-up questions about the analysis  
 16 presented by Mr Welch; he's entering into a forensic  
 17 test of trying to argue his point about whether or not  
 18 these documents comply with paragraphs 19 and 20 of  
 19 Procedural Order No. 17, which is something that can be  
 20 done, I submit, in argument or in post-hearing briefs,  
 21 and does not require going back to Mr Welch, reopening  
 22 questions that were not discussed during our  
 23 examination, but simply goes to a philosophical question  
 24 about the nature of a demonstrative --  
 25 MR DAELE: It's not philosophical; it's based on what has

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19:12 1 been presented to the Tribunal. These red arrows  
2 indicate work.  
3 MR OSTROVE: If you listened to the end of my comment  
4 instead of interrupting me, you would have heard that  
5 I said: a philosophical question about what it means to  
6 have a demonstrative exhibit.  
7 So Mr Welch has already testified that this was put  
8 in the record in response to Mr Radley, and this is  
9 a demonstrative exhibit. To start questioning him about  
10 whether that was previously in the record, the arrows,  
11 I think is a harassment of the witness for a forensic  
12 point about your argument on paragraphs 19 and 20. And  
13 with respect, I don't think it's appropriate.  
14 MR DAELE: I want to test, as 19 sets out, whether this is  
15 work, whether this is information that was on the record  
16 or not. So for each of the slides, I want to test  
17 whether this information was on the record or not. And  
18 we will see for each of these slides that the answer  
19 will be negative.  
20 MR OSTROVE: And with respect, that can be argued, the  
21 information about --  
22 MR DAELE: No, I want to hear it with evidence from the  
23 experts, now they are here.  
24 THE PRESIDENT: I think I understood this to have been drawn  
25 up in response to Mr Radley's comments.

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19:14 1 MR DAELE: We just heard about the previous slides: the  
2 answer was no.  
3 THE PRESIDENT: No, I'm speaking about slide 16 now.  
4 I understood slide 9 to be different. We can argue  
5 about that one.  
6 MR DAELE: Mm-hm.  
7 THE PRESIDENT: So this was in response to Mr Radley's  
8 criticism.  
9 We can do the same exercise with the other slides --  
10 MR DAELE: Can we go to slide 41 then, please. This  
11 contains information about the formation of the  
12 signature on R-28, and I remember you said there are  
13 19 movements. Is this information that was on the  
14 record?  
15 A. (Mr Welch) This is part of my report and the examination  
16 process, yes.  
17 Q. Was it on the record? Will we find narrative in your  
18 final report about the 19 movements of the signature?  
19 A. (Mr Welch) You will not find the narrative, but it is  
20 absolutely part of my examination and considered in the  
21 report.  
22 Q. Can you show us where it is considered?  
23 THE PRESIDENT: I think the expert already said there is no  
24 narrative.  
25 MR DAELE: But he said it's "considered in the report", so

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19:15 1 there should be a trace in the report.  
2 THE PRESIDENT: I understand when you say it was "considered  
3 in the report" that it was considered in the formation  
4 of your examination process, but you have not written  
5 down anything about it. If I misunderstand you, of  
6 course you will correct me.  
7 A. (Mr Welch) Yes, so we go again to a similar comment on  
8 the Asher Avidan, where I state:  
9 "... reveal[s] ... fluency with good line quality,  
10 pen pressure variation, hooks, and tapered strokes."  
11 Again, I consider this part of my examination  
12 process in the report.  
13 MR DAELE: Do you talk about formation in what you just  
14 read?  
15 A. (Mr Welch) No.  
16 Q. Okay, thank you.  
17 A. (Mr Welch) But --  
18 Q. So the same goes for the signature R-29?  
19 A. (Mr Welch) Again, I'm just going to restate for the  
20 record that formation is absolutely part of the  
21 examination process and that is embedded into our  
22 report.  
23 THE PRESIDENT: Excuse me. Is this slide responsive to  
24 Mr Radley's comments?  
25 A. (Mr Welch) No.

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19:16 1 THE PRESIDENT: No. This is an explanation like you had in  
2 slide 9?  
3 A. (Mr Welch) Correct, to illustrate for the Tribunal.  
4 MR DAELE: Can we go to slide 44, please. Do we find  
5 information on the record where you analyse the vertical  
6 similarity of signature R-28?  
7 A. (Mr Welch) Again, this was evaluated in my examination  
8 process and is embedded into the report, and was  
9 considered during the examination process.  
10 This particular image was put together after reading  
11 Mr Radley's report to show that these characteristics  
12 are similar with those habits of Mr Asher, or  
13 Avidan Asher.  
14 Q. Slide 46, the "Rounded Arc End Similarity"?  
15 A. (Mr Welch) Same response.  
16 Q. No, 46. (Pause) Is this also a slide that was prepared  
17 in response to Mr Radley?  
18 A. (Mr Welch) Again, this would be the same response as my  
19 last.  
20 Q. Slide 48, "Variations in Loop Sizes"?  
21 A. (Mr Welch) Again, the response would be the same as the  
22 last.  
23 Q. Slide 50, "L-Shaped element similarity"?  
24 A. (Mr Welch) Response would be the same as the last.  
25 PROFESSOR VAN DEN BERG: When you say the "Response would be

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19:19 1 the same as the last", that includes it is responsive to  
 2 Mr Radley's --  
 3 A. (Mr Welch) Yes, sir, that's correct.  
 4 MR DAELE: Slide 53, the "Variation Exh[i]bited in  
 5 Downstroke"?  
 6 A. (Mr Welch) The response would be the same as the last.  
 7 Q. Slide 55?  
 8 A. (Mr Welch) That response would also be the same as the  
 9 last.  
 10 Q. Slide 57?  
 11 A. (Mr Welch) That response would be the same as the last  
 12 also.  
 13 Q. Slide 28?  
 14 A. (Mr Welch) That response would be the same as the last.  
 15 Q. And 30?  
 16 A. (Mr Welch) That response would be the same as the last.  
 17 Q. 31?  
 18 A. (Mr Welch) That response would be the same as the last.  
 19 Q. 32?  
 20 A. (Mr Welch) That response would also be the same as the  
 21 last.  
 22 Q. 35?  
 23 A. (Mr Welch) And that response would be the same as the  
 24 last.  
 25 Q. And 37 we've already seen.

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19:20 1 A. (Mr Welch) You've already done that.  
 2 MR DAELE: Okay, thank you very much. I have no further  
 3 questions.  
 4 MR WELCH: You're welcome.  
 5 THE PRESIDENT: Would you just remind me what the answer was  
 6 about 37?  
 7 A. (Mr Welch) That was in preparation after Mr Radley's  
 8 report.  
 9 THE PRESIDENT: In response to Mr Radley?  
 10 A. (Mr Welch) Correct.  
 11 THE PRESIDENT: No further question, Mr Daele?  
 12 MR DAELE: No. Unless you insist!  
 13 THE PRESIDENT: Can I turn to Respondent. (Pause)  
 14 Mr Ostrove, you have the floor.  
 15 MR OSTROVE: I might have some good news, which is: we have  
 16 no further questions.  
 17 THE PRESIDENT: Good. So that leads us to the end of this.  
 18 Any afterthoughts?  
 19 MR LIBSON: We do have an afterthought, which is not  
 20 an afterthought, it's an issue about our preparations  
 21 for tomorrow. Sorry, is that --  
 22 THE PRESIDENT: Yes, we're about to address this,  
 23 absolutely.  
 24 So the experts remain available for their concluding  
 25 remarks, which means that you're still under the

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19:22 1 admonition not to speak to anyone about your evidence as  
 2 long as you're not released from testimony.  
 3 MR LAPORTE: And that includes each other too, correct? I'm  
 4 just thinking if we're going to put together a summary  
 5 statement -- I just want to understand the rules.  
 6 THE PRESIDENT: No, I understand the rule -- unless anyone  
 7 has different views and wants to put them forward -- to  
 8 be that you can speak among yourselves. What you cannot  
 9 do is speak with third persons, whoever they are.  
 10 MR LAPORTE: Sure, okay.  
 11 MR WELCH: Yes.  
 12 THE PRESIDENT: About the case. You can order dinner, of  
 13 course!  
 14 Tomorrow we will start with the Claimants' expert,  
 15 Mr Radley -- we have the timing here; I hope we can  
 16 stick to that -- and then we hear the Respondent's  
 17 experts. Thereafter, we may have concluding remarks  
 18 from the experts. You will have listened to what the  
 19 party experts will put forward tomorrow. We will see  
 20 whether we have any additional final questions for you.  
 21 And then we will have the closing statements, for which  
 22 we also have a time indicated.  
 23 Is there any issue that we should address now?  
 24 I understand there's something on the Claimants' side.  
 25 MR LIBSON: As we come to the end of a very long day, for

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19:24 1 which we thank the Tribunal and everyone else for  
 2 sitting late, we face exactly the issue that we  
 3 identified in our email last night, which is that we are  
 4 facing very significant prejudice by virtue of the  
 5 introduction of new material, not only last night but  
 6 during the course of today, as we just looked at. Some  
 7 of that new material, as I mentioned this morning,  
 8 comprises diagrams that we've looked at that we don't  
 9 accept are properly presented.  
 10 Tomorrow Mr Radley has to give his presentation,  
 11 based on material that he glanced at last night and  
 12 heard live during the course of today, and he hasn't  
 13 come prepared to do that. The presentation that he had  
 14 prepared for tomorrow, which was addressed towards the  
 15 final report in its entirety, now has to be radically  
 16 reconsidered, based on the material that has come  
 17 forward today.  
 18 So we have a problem about the way in which we are  
 19 able to present Mr Radley tomorrow; certainly his  
 20 written presentation that he wanted to make available  
 21 overnight. I think, if he may, Mr Radley would like to  
 22 just talk to you about what he is able to do in the  
 23 limited time that is available.  
 24 THE PRESIDENT: Mr Radley?  
 25 MR RADLEY: Madam President, it's now very late in the

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19:26 1 evening. As James said, I came prepared with  
 2 a presentation which is not appropriate now, in light of  
 3 what was presented last night. I haven't had the  
 4 opportunity of collecting material that I could have  
 5 done. I have able to get some material via the  
 6 telephone with my office.  
 7 To be quite frank, to prepare a new presentation,  
 8 especially bearing in mind the huge amount of new  
 9 information that's been presented, I would normally ask  
 10 for a day or two. It's now 7.30. There are going to be  
 11 significant problems in me getting something down.  
 12 The only thing that I can think of is that --  
 13 PowerPoint is lovely, you can do very pretty diagrams,  
 14 but it is very time-consuming when you're looking at  
 15 these diagrams and what have you. What I can possibly  
 16 do is take the illustrations and hand-annotate them, and  
 17 presumably we can get them copied.  
 18 Again, there are some references, there's one or two  
 19 particular references which I have obtained this  
 20 afternoon that again really would be better as  
 21 a handout, I feel. It's not the sort of thing that I'm  
 22 going to get on to a PowerPoint in any sort of time.  
 23 And that is the only way that I feel I can really  
 24 contribute. As I say, I am unable, obviously, to access  
 25 my library. There's various quotations and what have

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19:28 1 you put forward from a number of books. I am not in  
 2 a position to extract from my library the quotations  
 3 that I would like to, which obviously support my case.  
 4 From that point of view, as I say, I'm going to be  
 5 very limited in what I can do tomorrow, and the only way  
 6 that I can see it is by hand-annotation and hopefully  
 7 getting enough copies, if we can organise copies to be  
 8 taken.  
 9 THE PRESIDENT: There's no magic about PowerPoints. It's  
 10 one technique; there are other techniques. So if you  
 11 want to do annotations and hand them in, that's fine.  
 12 You have come here after having filed a report, and  
 13 we are just interested, having now heard the Tribunal's  
 14 experts comment on your report, in your reactions.  
 15 That's what we want to hear. So I'm sure you can handle  
 16 this very well.  
 17 MR RADLEY: Yes. There is nothing like an illustration:  
 18 a picture speaks a thousand words. That I'm not going  
 19 to able to do. I can obviously annotate copies, and if  
 20 we can get those handed round and we can actually look  
 21 at pieces of paper, that's the best way forward,  
 22 I think, in the long run.  
 23 (The members of the Tribunal confer)  
 24 THE PRESIDENT: Maybe I should clarify one point, because  
 25 you spoke of materials being introduced. What has been

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19:30 1 introduced into the record are the slides that were  
 2 referred to by the experts in answer to questions; all  
 3 the others are not. The Secretary will circulate a list  
 4 with the slides in a moment.  
 5 It also struck me, hearing your answers to the  
 6 Claimants' counsel, that there are two slides that you  
 7 prepared not in response to Mr Radley but just to better  
 8 explain your train of thought in the report, but that  
 9 are not in the report, and these are slides 9 and 41.  
 10 The Tribunal thinks that since they are not responsive  
 11 and they were not contained in your report earlier on,  
 12 we should not accept those into the record.  
 13 So, having said this, the Secretary will make a list  
 14 of the slides that are effectively in the record. And  
 15 I should also mention that the PDF presentation is not  
 16 in the record. Of course the transcript is in the  
 17 record, but that is not additional documentation. So we  
 18 are clear on what the basis is, and what is in and what  
 19 is out.  
 20 MR LIBSON: I mean, just in terms of timing, we're not going  
 21 to have anything, realistically, until we turn up  
 22 tomorrow.  
 23 THE PRESIDENT: That is a different question. I was just  
 24 saying what we consider now from the PowerPoint slides  
 25 of the Tribunal-appointed experts to be in the record,

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19:32 1 and that is much less material than the full slide  
 2 presentation.  
 3 Now, the rule was that you can give your  
 4 presentation when you start speaking, unless it has  
 5 demonstratives, which then should be given earlier; that  
 6 is, the night before. But now we are already past the  
 7 deadline. The same applies actually for the  
 8 Respondent's experts.  
 9 When do you think you can exchange this between  
 10 counsel?  
 11 MR LIBSON: Just tomorrow morning.  
 12 MR OSTROVE: I don't know if we're on the record or off the  
 13 record for this.  
 14 THE PRESIDENT: We can do this off the record.  
 15 (7.33 pm)  
 16 (A discussion took place off the record)  
 17 (7.37 pm)  
 18 THE PRESIDENT: So with respect to documents to be exchanged  
 19 before the hearing tomorrow, do we have an agreement?  
 20 And, if so, what is it?  
 21 MR LIBSON: The agreement from our side is that we will  
 22 bring whatever we are going to rely upon to this  
 23 building at 7.45 tomorrow to have it copied, and then we  
 24 will distribute it thereafter.  
 25 THE PRESIDENT: Before the hearing?

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19:37 1 MR LIBSON: Yes.  
2 THE PRESIDENT: Fine.  
3 Have you heard what Mr Libson said?  
4 MR OSTROVE: Yes, that's fine. We would of course like, if  
5 possible, if we have someone here at that time, to  
6 receive the copies right away at 7.45, so we have some  
7 advance time to be prepared. The copies will be  
8 commencing at 7.45? That's fine.  
9 THE PRESIDENT: You get the first copy, let's put it that  
10 way.  
11 Fine. Is there anything else we should deal with  
12 now?  
13 MR OSTROVE: We just wanted to put on the record  
14 an objection to the refusal to accept the demonstratives  
15 and presentations created by the experts, which we  
16 believe complied with Articles 19 and 20 of Procedural  
17 Order 17. We believe it's unfortunate for the Tribunal  
18 not to have the benefit of the full demonstrative  
19 exhibits.  
20 THE PRESIDENT: Fine. Noted.  
21 So I thank everyone for their cooperation. It was  
22 a very long day, but we did achieve what we had to  
23 achieve today. So now we can go to work and get some  
24 rest as well, to continue tomorrow.  
25 Mr Welch, Mr LaPorte, thank you very much for your

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19:40 1 THE PRESIDENT: Je vous en prie.  
2 Good evening to everyone.  
3 (7.40 pm)  
4 (The hearing adjourned until 9.00 am the following day)  
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19:39 1 explanations today. And I should specifically thank the  
2 interpreters and the court reporters for having stayed  
3 on that long.  
4 Mr Ostrove wants to add something?  
5 MR OSTROVE: With apologies. A question for the preparation  
6 of the closing arguments. I think there was some  
7 ambiguity -- although maybe I'm misremembering it -- as  
8 to whether the closing arguments will address only the  
9 question of recusal and admissibility of the experts and  
10 the expert report respectively, or whether it is simply  
11 to be focused on that, with additional argument about  
12 what we've heard.  
13 THE PRESIDENT: The "focus" language was deliberate, in the  
14 sense that we did not want the parties to be deprived  
15 [of] saying something else if they feel that they need  
16 to say something orally tomorrow to us. But the most  
17 pressing issue is certainly the one of the  
18 disqualification. And on all other matters there will  
19 be post-hearing briefs, a topic that we will have to  
20 discuss tomorrow at the end of the hearing.  
21 Is it clear enough like this? So our main interest  
22 is disqualification, but if you think you need to speak  
23 about something else during these 45 minutes, then of  
24 course you are not barred from doing it.  
25 MR OSTROVE: Merci.

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