

security border, and, much to the chagrin of Factcheck and the Obama Campaign, a new Seal and Signature stamp.

21. With my experience and specialization in document imaging, my findings are conclusive and irrefutable, as outlined in EXHIBIT "A," that the COLB images posted by Obama to his campaign website, fightthesmears.com, to the dailykos.com, a pro-Obama blog, to FactCheck.org, a pro-Obama political research group, and to Politifact.org, are, in fact, image forgeries, created with the intent to defraud the American People into believing that these images were digitally scanned from Barack Obama's genuine, "original" birth certificate, and that Obama had satisfied the requirement of being a natural-born US citizen.

22. With my experience and specialization in photography and digital imaging, my findings are conclusive, as outlined in Exhibit "A," that the COLB photographs posted by FactCheck.org, a pro-Obama political research group, and to Politifact.org, are, in fact, photographic forgeries, created with the intent to defraud the American People into believing that these digital photographs were taken of Obama's genuine, "original" birth certificate, and that Obama was really a natural-born US citizen qualified to be President of the United States.

23. Attached hereto as Exhibit "A", is a true and correct copy of my opinions concerning the Obama certification of live birth, which I previously published and incorporate herein as if fully set forth.

I declare under the penalty of perjury of the laws of the United States, that the foregoing is true and correct.

  
XXXXXXXXXXXXXXXX

NO. 29473

IN

THE SUPREME COURT OF THE STATE OF HAWAII

CONSTITUTION PARTY; ALAN L. KEYES; )

Plaintiffs, )

vs. )

LINDA LINGLE in her official capacity as )

Governor of the State of Hawaii; KEVIN B. )

CRONIN in his official capacity as the Chief )

Election Officer for the State of Hawaii; JOHN )

DOES 1-50; JANE DOES 1-50; DOE )

PARTNERSHIPS 1-50; DOE )

CORPORATIONS 1-50; AND DOE )

ENTITIES 1-50 )

Defendants. )

ORIGINAL PROCEEDING

DECLARATION OF SANDRA  
RAMSEY LINES; EXHIBIT C

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Declaration of Sandra Lines.wpd

DECLARATION OF SANDRA RAMSEY LINES

I, Sandra Ramsey Lines, declare as follows:

1. I am Sandra Ramsey Lines, with an address at 6200 East Cholla Lane, Paradise Valley, Arizona 85253. I am a former federal examiner and law enforcement officer. I began training as a forensic document examiner in 1991. I am a Certified Dilomate with the American Board of Forensic Document Examiners, a Fellow in the American Academy of Forensic Sciences, a member of the American Society of Questioned Document Examiners, a member of the Southwestern Association of Forensic Document Examiners, and a member of the Questioned Document Subcommittee of the American Society of Testing and Materials. My background and credentials are set forth in Exhibit I attached hereto.

2. I have reviewed the attached affidavit posted on the internet from "Ron Polarik," who has declined to provide his name because of a number of death threats he has received. After my review and based upon my years of experience, I can state with certainty that the COLB presented on the internet by the various groups, which include the "Daily Kos," the Obama Campaign, "Factcheck.org" and others cannot be relied upon as genuine. Mr. Polarik raises issues concerning the COLB that I can affirm. Software such as Adobe Photoshop can produce





**EXHIBIT I**  
**SANDRA RAMSEY LINES**

**Forensic Document Examiner**

6200 East Cholla Lane

Paradise Valley, Arizona 85253

Business: (480) 429-3999 - Facsimile: (480) 429-4677

E-Mail: [SRLines@cox.net](mailto:SRLines@cox.net)

<http://www.asgde.org/>



**CURRICULUM VITAE**

EXPERIENCE

- 1999 – Present    **Private Practice, Forensic Document Examiner** - Conduct examination of questioned documents, which consists of the analysis and comparison of handwriting, hand printing, typewriting, commercial printing processes, photocopies, paper, inks, and other documentary evidence to determine identity, source, authenticity, alterations, additions, deletions, or other germane issues. Examinations include business and/or medical records. Expert testimony experience in state and federal courts, and regulatory hearings.
- 1999 – 2003    **Intelligence Specialist** – Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms, Phoenix Field Division, Phoenix, AZ. Served as the intelligence coordinator and the Division’s intelligence expert (5 states). Responsible for ascertaining the Division’s intelligence needs; developing and implementing the means to satisfy such requirements. Served as Bureau representative and liaison to outside intelligence related organizations; performed analyses of major complex investigations; and provided analytical reports of such activities. In addition, acted as forensic document examiner consultant and expert witness in ATF related cases. Top secret clearance.
- 1996 - 1999    **Senior Document Analyst** - Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms, San Francisco Forensic Science Laboratory, Walnut Creek, CA. Conducted examinations of questioned documents, which consisted of the analysis and comparison of handwriting, hand printing, typewriting, commercial printing processes, paper, inks, and other documentary evidence. Testified in state and federal courts. Secret clearance.
- 1991 - 1996    **Forensic Document Examiner** - Office of the Attorney General, Phoenix, AZ. Established questioned document laboratory utilized by Medicaid Fraud Units throughout the United States and developed AZ Police Officer Standards and Training approved lesson plan for training on the “Techniques of Questioned Document Investigation.” Depositions and testimony in state courts, civil and regulatory proceedings.
- 1985 - 1996    **Special Agent/AZ Certified Peace Officer** - Office of the Attorney General, Special Investigations Section, Phoenix, AZ. Identified, planned, and developed strategies for complex

felony investigations, which included: consumer, medical, financial frauds; environmental crimes; political corruption, and other matters.

- 1987 - 1988 **Assistant Director** - Western States Hazardous Waste Project, Office of the Attorney General, Phoenix, AZ. Maintained coordination and cooperation between members in multi-state program. Developed and implemented training; collected, stored, and disseminated information; prepared bi-monthly newsletter.
- 1984 - 1985 **Investigator/AZ Certified Peace Officer** - Maricopa County Attorney's Office, Phoenix, AZ. Conducted major felony investigations involving violent crimes and frauds.
- 1983 - 1984 **Investigator** - AZ Board of Medical Examiners, Phoenix, AZ. Investigated criminal and civil complaints pertaining to physicians, physician assistants, unlicensed medical practitioners; coordinated complex investigations with law enforcement and regulatory agencies
- 1973 - 1982 **Sergeant/Ohio Certified Peace Officer** - Cleveland Police Department, Cleveland, OH. Supervised platoon of 40 officers in all phases of police work; as a detective assignments included vice, general duty, strike force, and homicide; and as an evidence technician/patrol officer responsible for crime scene photographs, latent prints, and trace evidence as well as all other radio calls.

#### CERTIFICATION

- 1996 American Board of Forensic Document Examiners, Diplomate. Advertising Editor for the *ABFDE News* 1997-1999

#### PROFESSIONAL ORGANIZATIONS

- 1998-Present American Academy of Forensic Sciences, Questioned Document Section, Fellow. Member 1996-1997, Provisional Member 1994-1995. Elected Questioned Document Section Secretary for 2004-2005, Section Chair 2005-2006.
- 1999-Present American Society of Questioned Document Examiners, Member. Provisional Member 1995-1999. Member of the Editorial Board of the *Journal of the American Society of Questioned Document Examiners*, 1997 to 2004. Editor 2004-2007.
- 1995-Present Southwestern Association of Forensic Document Examiners, Member. Provisional Member 1993-1994.
- 2000-Present American Society of Testing and Materials, Member E-30 Forensic Sciences Committee, Member E30.02 Questioned Document Subcommittee.

#### EDUCATION

Arizona State University, School of Public Affairs/Advanced Public Executive Program and the State of Arizona, Phoenix, AZ - Certified Public Manager 1993

University of Phoenix, Phoenix, AZ - Bachelor of Arts, Management, 1989

Scottsdale Community College, Scottsdale, AZ - Associate of Arts, Major - Administration of Justice, Honors, 1987

#### EXPERT TESTIMONY INCLUDES

Federal courts in Alaska, Arizona, California, Idaho, Texas, and Washington.  
State courts in Arizona, California, Nevada, and Texas.

PUBLICATIONS/PRESENTATIONS

- 2008 **Speaker:** “The Work of the Forensic Document Examiner.” Phoenix North Rotary Club, Phoenix, AZ (June 12).
- 2007 **Presenter:** “A Thumbnail Sketch of Islam and Judaism as They Relate to Forensic Document Examination and the Courts.” Paper presented at the 65<sup>th</sup> Annual Conference of the American Society of Questioned Document Examiners, Boulder, CO (August 16).
- 2006 **Presenter:** “Legal Terms for Expressing Conclusions in Court.” Paper presented at the 64<sup>th</sup> Annual Conference of the American Society of Questioned Document Examiners, Portland, OR (August 22).
- 2006 **Publication:** “Examination of a ‘Velasco’ Signature on an Oil Painting.” Published in the *Journal of the Forensics Sciences*, July 2006, Vol. 51, No. 4, pp. 929-933
- 2005 **Publication:** “A Study of Business Letter Features.” \*Lines and Randy B. Carodine. \*Research presented at the 57<sup>th</sup> Annual Meeting of the American Academy of Forensic Sciences, New Orleans, LA (February) 2005, and at the Southwestern Association of Forensic Document Examiners, Monterey, CA (March) 2003. Published in the *Journal of Forensic Sciences*, Vol. 50, No. 4, July, 2005, pp. 924-927.
- 2005 **Speaker:** “Forensic Document Examination.” Tempe Rotary Club. Tempe, AZ (June 14).
- 2005 **Presenter:** “Publish or Perish.” Paper presented at the Southwestern Association of Forensic Document Examiners Spring Meeting, Palm Springs, CA (May).
- 2005 **Speaker:** “What is a Forensic Document Examiner?” The P.E.O. Sisterhood Luncheon Meeting, Scottsdale, AZ (January).
- 2003 **Publication:** “Identifying Manufacturer and Date of Manufacture of CD-R or CD-RW.” \*Lines and Jared Annes. \*Research presented at the 61st Annual Meeting of the American Society of Questioned Document Examiners, Baltimore, MD (August). Published in the *Journal of the American Society of Questioned Document Examiners*, Vol. 6, Number 2, December 2003.
- 2002 **Book Review:** *Writing and Defending Your Expert Report, The Step-by-Step Guide with Models*, Steven Babitsky and James Mangraviti, Seak, 2002. Review published in *The Southwestern Examiner* (September).
- 2002 **Publication:** “Triplet & Sibling Handwriting Study to Determine Degree of Individuality and Natural Variation.” \*Lines and Frankie E Franck. \*Research presented at the 60<sup>th</sup> Annual Meeting of the American Society of Questioned Document Examiners, San Diego, CA (August). Published in the *Journal of the American Society of Questioned Document Examiners*, Vol. 6, Number 1, June 2003, pp. 48-55.
- 2002 **Book Review:** *Opportunities in Forensic Science Careers*, Blythe Camenson, McGraw Hill, 2001. Review published in the *ABFDE News*, Vol. XIII, Number 1 (January).
- 2001 **Publication:** “Yoeme: The Yaqui Alphabet,” Research presented at the 20<sup>th</sup> Anniversary Meeting, Southwestern Association of Forensic Document Examiners, Tempe, AZ (September). Published *The International Journal of Forensic Document Examiners*, Vol. 6, No. 1, April 2003 (on-line).
- 2001 **Publication:** “Dinè Bizaad: The Navajo Alphabet,” Research presented 59<sup>th</sup> Annual Meeting of the American Society of Questioned Document Examiners, Des Moines, IA (August). Published *The International Journal of Forensic Document Examiners*, Vol. 6, No. 1, April 2003 (on-line).

- 1999 **Publication:** “Normal Course-of-Business Records v. Manufactured Records.” \*Sandra Ramsey Lines, Jan Seaman Kelly, and Diane K. Tolliver. \*Research presented at the 57<sup>th</sup> Annual Meeting of the American Society of Questioned Document Examiners jointly held with the International Association of Forensic Sciences in Los Angeles, CA (August). Published *Journal of the American Society of Questioned Document Examiners*, Vol. 2, No. 1, June. Translated into Spanish by Julia E. de la Peña, published *Indagaciones documentales*, Ediciones La Rocca: Buenos Aires 2008.
- 1998 **Book Review:** “Review of the *Modern Scientific Evidence: The Law and Science of Expert Testimony*,” Faigman, D., et al., West, 1997. Review published in *The California Identification Digest*, Vol. 98, Issue 3, (March).
- 1997 **Publication:** “A Study of the Evolution of Handwriting from Grades Three to Six.” Published in the *Journal of the American Society of Questioned Document Examiners*, Vol. 1, No. 1, June. Research presented at the 55<sup>th</sup> Annual Conference of the American Society of Questioned Document Examiners in Scottsdale, AZ (August).
- 1997 **Paper:** “Microsoft® Encarta®: A Resource for Forensic Document Examiners,” 48th Annual Meeting of the American Academy of Forensic Sciences, New York, NY (February).
- 1997 **Speaker:** “Forensic Document Examination: Past and Present,” Bay Counties Identification Officer’s Association, Concord, CA (January).
- 1997 **Book Review:** *The Casebook of Forensic Detection*,” Colin Evans, John Wiley & Sons, NY, 310 pages. Review published in *The Southwestern Examiner*, Vol. XVI, Issue 1.
- 1996 **Publication:** “Indenture.” Historical and legal research of a 1729 document. Published in the *International Journal of Forensic Document Examiners*, Vol. 3, No. 3, July/Sept 1997. Presented at the 48th Annual Meeting of the American Academy of Forensic Sciences, Nashville, TN (February).
- 1995 **Documentary:** “Learning to Write in the 1990’s.” Co-producer (w/Leslie K. Rogers) and co-writer (w/Rada Tierney) of this minidocumentary film presented with a paper at the 53<sup>rd</sup> Annual Conference of the American Society of Questioned Document Examiners, Chicago, IL (September) and the Fall Conference of the Southwestern Association of Forensic Document Examiners, Las Vegas, NV (October).
- 1995 **Speaker:** “Fundamentals of Forensic Document Examination.” Arizona Women’s Accounting Society, Phoenix, AZ (April).
- 1995 **Publication:** “The Effect of Computers on Forensic Document Examiners.” Research published in the *International Journal of Forensic Document Examiners*, Vol. 2, No. 3, July/Sept 1996. Presented at the 47th Annual Meeting of the American Academy of Forensic Sciences, Seattle, WA (February) and the Spring Conference of the Southwestern Association of Forensic Document Examiners, San Diego, CA (April).
- 1994 **Speaker:** “Computer Technology and the Forensic Document Examiner,” Annual Meeting of the Computer Users Group, Security Division, Internal Revenue Service, Scottsdale, AZ (September).
- 1994 **Speaker:** “Forensics and Fraud,” Kiwanis Club, Carefree, AZ (July).
- 1994 **Publication:** “The Cherokee Syllabary.” Research involving a Native American alphabet still in use today. Published in the *Journal of Forensic Sciences*, Vol. 39, No. 4, July. Presented at the 46<sup>th</sup> Annual Meeting of the American Academy of Forensic Sciences, San Antonio, TX (February) and the Spring Conference of the Southwestern Association of Forensic Document Examiners, Avalon, CA (April).
- 1992 **Speaker:** “The Science of Examining Documentary Evidence,” Arizona Chapter of the Association of Certified Fraud Examiners, Phoenix, AZ (September).



- 1989 **Research Paper:** “To What Extent Have Computers and Computer-Generated Documents Impacted on the Role of the Questioned Document Examiner in Law Enforcement,” Southwestern Association of Forensic Document Examiners, Tucson, AZ (April).

#### TEACHING/MISCELLANEOUS

- 2008 Instructor: “Handwriting, Forensic Records, and the New Age of Computer-Based Fraudulent Documents,” Arizona Association of Criminal Justice, Tempe, AZ (March 13).
- 2006 Instructor: “Forensic Document Examination.” Forensic Medical Investigation (by National Faculty Member Dr. Mary Dudley, MD, Chief Medical Examiner, Forensic Pathologist and District Coroner, Sedgwick County Regional Forensic Science Center, Wichita, KA) Phoenix, AZ (November 9).
- 2005 Instructor: “Forensic Document Examination Overview.” Forensic Medical Investigation Seminar (by National Faculty Member Dr. Mary Dudley, MD, Chief Medical Examiner, Forensic Pathologist and District Coroner, Sedgwick County Regional Forensic Science Center, Wichita, KA) Phoenix, AZ (November 3).
- 2005 Instructor: “Questioned Documents – Including the ‘true story’ behind the Dan Rather/CBS debacle involving the examination of the alleged ‘Bush’ National Guard memos.” Arizona Public Defender’s Association, Tempe, AZ (June 22).
- 2005 Grand Awards Judge: Intel International Science and Engineering Fair, Behavioral and Social Sciences, Phoenix, AZ (May 10, 11).
- 2005 Moderator: “21<sup>st</sup> Century Crime – Forensic Science,” American Academy of Forensic Sciences, 57<sup>th</sup> Annual Meeting, New Orleans, LA (February).
- 2004 Instructor: “Forensic Document Examination Overview.” Forensic Medical Investigation Seminar (by National Faculty Member Dr. Mary Dudley, MD, Chief Medical Examiner, Forensic Pathologist and District Coroner, Sedgwick County Regional Forensic Science Center, Wichita, KA) Phoenix, AZ (November 11).
- 2004 Instructor: “Forensic Documents Issues in the Computer Age.” Continuing legal education State Bar of Arizona, San Diego, CA (July 16).
- 2001 Acknowledged for contribution to the Book *Opportunities in Forensic Science Careers*, Blythe Camenson, published by VGM, division of McGraw-Hill Companies, Lincolnwood, IL.
- 2000 Meeting participant and sub-committee member (since 1998) with the Scientific Working Group for Document Examiners (SWGDOC) at the Federal Bureau of Investigation Academy in Quantico, VA. SWGDOC is responsible for establishing and publishing written procedures and guidelines for questioned document examination (January).
- 1998 Instructor: ATF Agent Training Conference, Oxnard, CA, “The Forensic Document Examiner and the Agent” (June 8).
- 1998 Instructor: Provided 36 hours of training at ATF Laboratory to a document examiner trainee with the San Mateo County Sheriff’s Office, CA (April).
- 1998 Moderator: “Dating Document by Ink Analysis and Other Examinations,” American Academy of Forensic Sciences, 50<sup>th</sup> Anniversary Meeting, San Francisco, CA (February).
- 1997 Document Examiners of Northern California, organized. Planned and hosted quarterly study group meetings 1997 through 1999.



- 1997 Instructor: Provided 36 hours of training at ATF Laboratory to two document examiner trainees from Houston, TX Police Department (June).
- 1997 Instructor: Provided "Overview of Forensic Document Examination" to the Northern California Forensic Identification Unit Study Group, Concord Police Department, Concord, CA (January).
- 1997 Judge: Multiple District Four Lions 60<sup>th</sup> Annual Student Speakers Program, "Today's Legal System – Is it Justice?" Concord, CA.
- 1995 Instructor: "Curriculum Development Course," Medicaid Fraud Training Program, Federal Law Enforcement Training Center, sponsored by the National Association of Attorneys General, Glynco, GA (September).
- 1995 Training Committee Member: Arizona Law Enforcement Coordinating Committee Conference, "Officer Safety: Surviving in Troubled Times" (June).
- 1995 Instructor: "Techniques of Questioned Document Investigation," National Association of Medicaid Fraud Control Units Training Conference, Memphis, TN (May).
- 1992 Instructor: "Questioned Documents Collection and Submission Guidelines," two training presentations to Arizona Attorney General staff, Phoenix, AZ (January).

#### PROFESSIONAL TRAINING AND CONTINUED EDUCATION

Arizona Department of Public Safety, Scientific Analysis Division/Central Regional Crime Laboratory, Questioned Document Unit, Phoenix, AZ, two-year apprenticeship program in the field of forensic document examination, 1991-1993 (Lockard).

United States Secret Service, Federal Law Enforcement Training Academy, Glynco, GA, Questioned Document Course, June 1991, 80 hours.

Scottsdale Community College, Scottsdale, AZ, Photography I, II, and III, 1991-1992, 9 credit hours.

Paper Knowledge Workshop, The Meade Corporation, sponsored by the Southwestern Association of Forensic Document Examiners, Denver, CO, October 1992, 8 hours.

Federal Bureau of Investigation, Quantico, VA, Fundamentals of Questioned Documents Course, 80 hours, University of Virginia, November 1992, 4 credit hours.

United States Postal Crime Laboratory, San Bruno, CA, 160 hours of forensic document training, January 1993 (Lewis, Morton, et al.).

San Diego Police Department, Crime Laboratory, Questioned Document Section, San Diego, CA, 160 hours forensic document training, March 1993 (Oleksow).

Bureau of Alcohol, Tobacco and Firearms, Western States Regional Laboratory, Walnut Creek, CA, 40 hours forensic document training, June 1993 (Riker, Blanco).

Cleveland Police Department, Crime Laboratory, Cleveland, OH, 40 hours forensic document training, May 1993 (Wenderoth-Kelly).

Questioned Documents Reference Database and Typewriter Classification Database Workshop, American Academy of Forensic Sciences, San Antonio, TX, February 1994 (Bouffard), 4 hours.

Physical Match Workshop for Forensic Document Examiners, American Academy of Forensic Sciences, San Antonio, TX, February 1994 (McKasson), 20 hours.

Forensic Examination of Counterfeit Documents, American Society of Questioned Document Examiners, Long Beach, CA, August 1994 (Larner), 4 hours.

Instructor Development Course, AZ Police Officers Standards and Training, Phoenix, AZ, sponsored by the Phoenix Police Department, January 1995, 40 hours.

Case Documentation and Note Taking Workshop for ASCLD Lab Accreditation Requirements, Southwestern Association of Forensic Document Examiners, Reno, NV, April 1996 (Blake, Cunningham), 4 hours.

Private Practice Workshop, American Society of Questioned Document Examiners, Washington, D.C., August 1996 (Hart, Miller), 4 hours.

Ink-Jet Printers, Hewlett Packard (Drago-R&D), Southwestern Association of Forensic Document Examiners, Tucson, AZ, October 1996, 3 hours.

Laser Printer Re-Insertion Problems Workshop, Southwestern Association of Forensic Document Examiners, Tucson, AZ, October 1996 (Flynn), 4 hours.

Difficult and Complex Handwriting Examinations Seminar, sponsored by the American Board of Forensic Document Examiners, Burlingame, CA, January 1997 (Conway, Cunningham), 24 hours.

How to be a Better Expert Witness Workshop (Moseley JD, Dedrick JD), American Academy of Forensic Sciences, New York, NY, February 1997, 4 hours.

Courtroom Testimony, Laboratory Personnel, Bureau of Alcohol, Tobacco and Firearms, Rockville, MD, March 1997, 32 hours.

Questioned Documents Examination Proficiency Tests, Crime Laboratory Proficiency Testing Program: 1996, 1997, 1998.

Advanced Handwriting Identification: Handwriting Theory, Mechanics and Analysis, and the Fundamentals of Disguised Writing, University of New Haven Graduate School, School of Public Safety and Professional Studies, San Francisco, CA, February 1998 (Sang, Richards, Horan), 3 credit hours.

Computer Software Training: Windows 95, Outlook, Word, Excel, PowerPoint, Access, and Netscape. Sponsored by ATF, April 1-3, 1998, 24 hours.

Microscopy Workshop (Kline) sponsored by the Southwestern Association of Forensic Document Examiners, Breckenridge, CO, October 9, 1998, 4 hours.

Check Writer Workshop (Tierney), sponsored by the Southwestern Association of Forensic Document Examiners, Breckenridge, CO, October 10, 1998, 4 hours.

Seminar on Paper Fiber Analysis (Walter J. Rantanen, Integrated Paper Services, Inc.), sponsored by the Southwestern Association of Forensic Document Examiners, Marina Del Rey, CA, April 7-9, 2000, 12 hours.

Printing Process Identification and Image Analysis for Forensic Document Examiners, Rochester Institute of Technology, Rochester, NY, June 5-8, 2001, 28 hours.

Detection of Counterfeit Documents (Rick Outland of U.S. Secret Service), sponsored by the Southwestern Association of Forensic Document Examiners, Tempe, AZ, September 7, 2001, 6 hours.