

LABORATORY

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FORENSIC SCIENCE



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Please refer to Case No. 00-070

Mr. Lee Markovitz, Esq. 1220 Grant Building Pittsburgh, Pennsylvania 15219

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Re: Charles J. Goldblum (00-070)

FORENSIC REPORT

I have reviewed the testimony of Ronald B. Freeman regarding his description of apparent bloodstains on the dashboard within the vehicle in this case. His description is sufficiently detailed that I have been able to form a qualified opinion as to the most probable mechanism that produced the stains on the dashboard area.

First, he describes a, "..small line of blood droplets.."

Second, he described, "..it was not a lot of blood.."

Third, he described, ".. they were discernable droplets and they started on the -- toward the driver's side was the largest spot, and then they descended into smaller circles.."

Fourth, he described, "..each circle has what is called a 'tail' and the 'tail' was facing toward the passenger side.."

Mr. Freeman's description of the stain pattern he observed is an accurate characterization of a classic cast-off bloodstain pattern. He further testified, .. "that indicated that that blood came from left to right....from the driver's side of the automobile to the passenger's side.."

Based upon Mr. Freeman's description of the bloodstain pattern, it is entirely possible to form a qualified opinion regarding how that pattern most likely was produced.

FIRST CONCLUSION: If the bloodstains Mr. Freeman has described have been accurately characterized as to size, shape and location relative to each other, that is, in a line as opposed to a more random distribution, then I must conclude that some kind of an object, such as a finger, a small club, a knife, a screw

EXHIBIT 15

"Tails", which were described by Mr. Freeman, would not likely have resulted from the object if it were swung very far away from the dashboard, such as in the back seat area.

From the transcript of Toby Wolson dated 18 December 2000, the term "low force" was used several times. Putting aside the error in using this description to characterize bloodstain patterns, a low velocity impact could not likely have produced the bloodstain pattern that was described by Mr. Freeman. Impact spatter, such as occurs during a beating, or simply clapping the hands together when they are wet with blood, causes a random distribution of spatter not a line of bloodstains as was described in this case.

SECOND CONCLUSION: If the bloodstains Mr. Freeman has described have been accurately characterized as to size, shape and location relative to each other, that is, in a line as opposed to a more random distribution, then I must conclude that it is almost a certainty that this bloodstain pattern did not result from an impact to a source of blood.

Respectfully submitted,

Herbert Leon MacDonell, Director LABORATORY OF FORENSIC SCIENCE