

1 PAUL DENHAM
2 P-16644 E4-146
3 SATF FACILITY & STATE PRISON
4 P.O. BOX 5242
5 CORCORAN, CALIFORNIA 93212

6 Petitioner in Pro se

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **IN AND FOR THE COUNTY OF LOS ANGELES**

9 **PAUL DENHAM,**

10 Petitioner,

11 vs.

12 **STATE OF CALIFORNIA**

) **Case No.: NA 031090**

) **DECLARATION OF RUSSELL R.**
) **BRADFORD**

13 _____
14 **DECLARATION OF RUSSELL R. BRADFORD**

15 I, Russell R. Bradford declare as follows:

16 I am an examiner of Questioned Documents and Handwriting Identification Expert in
17 private practice since 1961. My business is located at 395 W. 6th Street #206, San Pedro,
18 California 90731. I have a bachelor's degree in Science. I have attended nine handwriting
19 courses, and received personal instruction from Richard Courtright and my father Ralph
20 Bradford. I taught Handwriting Examination at California State University at Long Beach and
21 was the Long Beach Police Department's Handwriting Examiner for twenty-three years.

22 I have over fifty years experience in examining handwriting cases and have made 44,239
23 examinations. I have been court appointed in 823 cases in Los Angeles, Orange and Riverside
24 Counties. I have qualified as an expert witness and testified in 735 cases in Juvenile, Municipal,
25 Superior, Federal, Military and special hearings.
26
27
28

1 I have also written a 488-page text "Introduction to Handwriting Examinations and
2 Identification" that was published by Nelson-Hall Publishers, Chicago, Illinois.

3 My examinations include the determination of the validity of documents through
4 comparison of handwriting on a questioned document to documents of known authors. On
5 January 21, 2015, I received a case from Paul Denham. Consisting of:
6

7 1. Stardust personalized stationary that contains writing and printing. The writing "South
8 West 1-800-531-5601" and "Delta 1-800-221-1212" (Exhibit A).

9 2. Page that contains writing, "I refuse to tape record my statement" (Exhibit B).

10 3. Detective Bureau Detail/Section Briefing Report document dated 8-31-95. This
11 document was filled out and signed "B McMahon" (Exhibit B).
12

13 4. Consent to Search document dated 3-16-95. This document was filled out and signed
14 "Bryon J McMahon" (Exhibit B).

15 5. Long Beach Police Department Fax Cover Sheet "Confidential" document dated 5-15-
16 13. This document was filled out from "Bryan McMahon" (Exhibit B).
17

18 6. Handwriting exemplars purporting to be of Estella Martinez (Exhibit C).

19 7. Handwriting exemplars purporting to be of Paul Denham (Exhibit D).

20 8. Handwriting exemplars purporting to be of Dolores Legaspi (Exhibit E).

21 On January 21, 2015, I performed examinations to determine if Bryan McMahon, Estella
22 Martinez, Paul Denham or Dolores Legaspi could be eliminated as the writer of the writing on
23 the document listed in item 1 (Exhibit A). From, my examination and comparison of the above
24 documents, it is my opinion that the persons that filled out the documents listed in item 6
25 (Exhibit C) Estella Martinez, item 7 (Exhibit D) Paul Denham, item 8 (Exhibit E) Dolores
26 Legaspi, did not write any of the writing on Exhibit A.
27
28

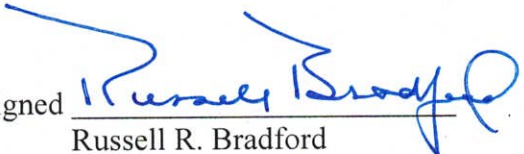
1 On January 22, 2015, I performed examinations to determine if Bryan McMahon is the
2 writer of the writing on the document listed in item 1 (Exhibit A). From, my examination and
3 comparison of the above documents, it is my opinion that it is highly probable that the writing
4 and number on the document listed in item 1 (Exhibit A), was written by the person that filled
5 out the documents listed in items 2, 3, 4 & 5 in the name "Bryan McMahon".
6

7 I had no problem working with copies of these documents. Having the originals in this
8 case would not have changed my opinion. I retained a copy of the submitted documents in my
9 file.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed this 4 day of February 2015, at San Pedro, California.
12

13
14 Signed


Russell R. Bradford
Questioned Document Examiner
15
16
17
18
19
20
21
22
23
24
25
26
27
28