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06-07-2019

CIRCUIT COURT  
DANE COUNTY, WI  
2018CV003122

# A.P. ROBERTSON

*Forensic Document Examiner and Mortgage Loan Auditor*

## *Curriculum Vitae*

I am currently the Chief Auditing Officer at KMBA ASSET LIQUIDATIONS. I have been in the Real Estate and Mortgage Businesses full time for over 28 years. I graduated first in my class at The American School of Mortgage Banking in 2002, where my main focus was in the field of underwriting sub-prime loans, specializing in fraud detection and loss prevention. I have extensive experience in hard money lending, private investigations and advising attorneys on litigation strategy in the foreclosure industry.

I have over 10,000 hours of time logged investigating fraudulent real estate transactions and documents with an emphasis on Securitized Mortgages and New York Trust Law. I work regularly with attorneys, accountants, private investigators, real estate agents and brokers, law enforcement officers, district attorneys, and various other experts in the field including those in the area of wholesale mortgage lending and securitization. I supply expert reports and opinions for attorneys to be used in foreclosure litigation and I specialize in Real Estate Mortgage Investment Conduits where improper securitization of mortgage loans is a relevant issue.

I am a voting member of the American Society for Testing and Materials International, which is the world leader in setting standards followed by all of the industrialized nations around the world. My membership number is #1694306. I am a participating member of the ASTM Committee on Forensic Sciences and I am on the Sub-Committee responsible for setting the standards and practices of Digital and Multimedia Evidence for the organization and I have full voting status. In the normal course of my business I regularly do Forensic Document Examinations and provide expert witness testimony and declaration as to the authenticity of said documents.

## **EXPERIENCE**

From	To	Company	City	State
08/25/90	03/11/94	Grand Estates Realty, Real Estate Agent	Campbell	CA
03/11/94	01/30/00	IREC Corp, Real Estate Broker/Owner	San Jose	CA
02/01/00	04/01/02	Alain Pinel Realtors, Broker Associate	Los Gatos	CA
04/01/02	01/01/03	Present Bay Area Foreclosure Consultants, Consultant, CEO	San Jose	CA
01/01/03	01/22/06	Harding Financial Services Inc., Mortgage Broker/Banker, CEO	Campbell	CA
01/21/06	Present	KMBA Asset Liquidations, Chief Auditing Officer, Litigation Advisor, Consultant	Santa Clara	CA

## PROFESSIONAL CERTIFICATIONS

08/25/90	California Department of Real Estate Salespersons--License Issued
03/11/94	California Department of Real Estate Broker--License Issued
01/21/02	Graduate American School of Mortgage Banking
05/01/12	Hispanic National Bar Association HNBA BAR # 022770
10/19/13	ASTM International-Forensic Sciences Voting Member #1694306



American Association for Clinical Chemistry, Inc. (AACC)  
 800-892-1400 \* (202)857-0717 \* FAX (202)833-4576  
 1850 K Street, NW Suite 625  
 Washington, DC 20006-2213

## CERTIFICATES OF COMPLETION FOR CONTINUING EDUCATION

1.	<b>Fundamentals of Non-Mass Selective Detectors</b>	<b>Activity No: 239-11NON-019</b>	<b>California No: 239-1109-019</b>
2.	<b>Expert Testimony Training for the Prosecutor and Scientist I</b>	<b>Activity No: 239-12NON-001</b>	<b>California No: 239-1209-001</b>
3.	<b>Expert Testimony Training for The Prosecutor and Scientist II</b>	<b>Activity No: 239-12NON-002</b>	<b>California No: 239-1209-002</b>
4.	<b>SOP Writing for ISO 17025</b>	<b>Activity No: 239-12NON-007</b>	<b>California No: 239-1209-007</b>

# CERTIFICATIONS

5.	Introduction to Questioned Documents	Certificate #1131370631
6.	Expert Testimony Training I	Certificate #1131439807
7.	Expert Testimony Training II	Certificate #1131438268
8.	Reassembling Crosscut Shredded Documents	Certificate #1131415336
9.	Digital Photography and Digital Enhancements	Certificate #1131394183
10.	Evidence and Admissibility	Certificate #1131398617
11.	How to Be a Good Expert Witness	Certificate #1131147614
12.	SOP Writing for ISO 17025	Certificate #1131436271
13.	The Ethics of Stewardship and the Stewardship of Ethics	Certificate #1131435177
14.	The Ethics of Leadership and the Leadership of Ethics	Certificate #1131434642
15.	Ethics 1: To Hell and Back	Certificate #1131435177
16.	Ethics 2: Answering the NAS	Certificate #1131434642
17.	Plenary Session 4	Certificate #1131334555
18.	OSTP Address to SOFT 2009	Certificate #1131426731
19.	Plenary Session 2	Certificate #1131371697
20.	Introduction to the NCLP (National Laboratory Certification Program)	Certificate #1131425945
21.	Fingerprint Identification: Reliability and Accuracy	Certificate #1135614608
22.	Latent Fingerprints: New Technology	Certificate #1135612680
23.	Next Generation DNA Technologies	Class in Progress

## INSTRUCTORS AND TRAINING



### RTI International Forensic Engineering Regional Training Institute

#### INSTRUCTORS:

David Baldwin	Stephanie Domitrovich	Christine Funk	Don Geary
Lesley Hammer	Leonard Butt	Ted Burkes	David Baldwin
Andy Smith	Carl Kriigel	Doug Murphy	Adam Grooms
Bill Demuth	Scott Shappell	George Herrin	Dean Gialamas
Matthew Durose			



Melissa R. Gische	FBI Laboratory, Forensic Examiner
Diana Harrison	FBI Laboratory, Handwriting Analyst
Michael Smith	FBI Laboratory, Quantico



#### Federal Bureau of Investigation

Katelyn Bruno	Correction Fluid and Correction Tape Removal
Eric Kalendra	The Bayesian Paradigm –Statistical Analysis
Gabriel Watts	Forensic Language-Independent Analysis System for Handwriting Identification (FLASH ID)



### Victoria Police Forensic Sciences

Disguised Handwriting Text	Simulated Handwriting Text
Carolyne Bird	Brian Found
Kay Ballantyne	Doug Rogers



### The United States Department of Justice

***REDACTED***	REDACTED (Not available to the public without court order)
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### Secret Service

Joseph Stevens, Secret Service's Forensic Services Division,	The Importance of Validating and Verifying a Standardized Method
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### National Institute of Justice

Office of Science and Technology Investigative Forensic Sciences Division	
Gerald LaPorte – Ink Expert (formerly with US Secret Service)	The Importance of Research and Practical Applications

## Laboratory Equipment:

➤ 8 Mega Pixel Camera
➤ 40 X Loupe
➤ Cedar Fox Handwriting Analysis Software
➤ Gas Chromatograph access
➤ 600 Watt High Pressure Sodium Lamp
➤ 600 Watt Metal Halide Lamp
➤ Ultra Violet Light
➤ Infrared Light
➤ 600X Microscope
➤ Sample Vials
➤ Finger Print kit
➤ 17 Piece X-acto kit
➤ Infrared Camera
➤ Latex Gloves
➤ Canon 4507B002 LiDE110 Scanner 2400 x 4800 Optical DPI, 48-bit color depth and over 281 trillion possible colors, DPI up to 19,200 x 19,200 (Interpolated) software enhanced scans.
➤ Interpolating software enhancement to 368,640,000 Dots per Inch

## FEDERAL COURT DISCLOSURES

1. In accordance with Rule 26(a)1(B), I give the following disclosures. During the last 10 years I have given hundreds of opinions, declarations and affidavits, I have not been called to testify in Federal Court during the last four years as my specific segment of the industry settles the majority of all cases that are actively involved in litigation before the trial stage.
2. My fee schedule is based on an hourly rate of four hundred dollars, for court appearances with a maximum of two thousand dollars per diem. I have a flat rate of five hundred dollars for a lunch meeting, regardless of the length. I pay all of my own expenses and offer affordable long-term financing. I do a considerable amount of pro bono work as well.
3. I have not authored any publications in the last 10 years; however, I plan to release a new method of document mapping and coding that has proven extremely reliable and effective with extensive and consistent empirical data I have been able to produce with this technique. I anticipate submitting the data to my committee for publication and peer review in the summer of 2015 and at that time I may consider publishing a book on the subject.