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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

STATE OF WASHINGTON,)	
)	
)	Plaintiff,
)	No. 10-1-09274-5 SEA
vs.)	
)	
EMANUEL FAIR,)	DECLARATION OF DR. GREG
)	HAMPIKIAN
)	
)	Defendant.
)	
)	
)	

I, Greg Hampikian, Ph.D. hereby declare as follows:

1. I am over 18 years of age and I am competent to make this declaration.
2. I am a professor in the department of Biology at Boise State University in Boise, Idaho, with a joint appointment in the department of Criminal Justice. I have a Ph.D. in Genetics from the University of Connecticut, and performed postdoctoral research at La Trobe University in Australia, and at the Worcester Foundation for Experimental Biology in Massachusetts. I have also held teaching and research positions at the Yale University Medical School, the Centers for Disease Control and Prevention (CDC), the Georgia Institute of Technology, Emory University, and Clayton College and State University. I teach graduate and undergraduate courses, including Forensic Biology, Advanced Genetic Analysis, Biotechnology, Forensic Evidence in Cold Cases, DNA Evidence in Wrongful Convictions, and Genetics. I am also the Director of the Idaho Innocence

Daniel T. Satterberg, Prosecuting Attorney
W554 King County Courthouse
516 Third Avenue
Seattle, Washington 98104
(206) 296-9000, FAX (206) 296-0955

1 Project. I supervise both undergraduate and graduate students, and I have taught students
2 who have gained employment at government forensic crime laboratories.

3 3. Currently my research focuses on DNA analysis, including DNA database and population
4 studies, forensic casework analysis, and forensic DNA technology development. I have
5 published the results of my work in peer-reviewed journals including Nature, the
6 Proceedings of the National Academy of Sciences, the Journal of Forensic Science, the
7 International Journal of Legal Medicine, and Human Biology, among many others. I
8 have written scholarly reviews of forensic DNA topics for the Canadian Journal of Police
9 and Security Services, and the Annual Review of Genetics and Genomics, among others.
10 I am a member of the American Academy of Forensic Sciences, and I have offered
11 professional development courses for the American Academy of Forensic Sciences on
12 forensic DNA analysis. I am also a member of the International Society for Forensic
13 Genetics, and have presented my research findings there.

14 4. I have published articles and presented at professional meetings on the topic of
15 subjectivity and bias in DNA interpretation (see Dror, Itiel E., and Greg Hampikian.
16 "Subjectivity and bias in forensic DNA mixture interpretation." Science & Justice 51.4
17 (2011): 204-208.)

18 5. I have trained police, crime lab workers, and lawyers in DNA analysis, and I have
19 worked on murder and rape cases with police in both the United States and France, and I
20 have recently published my work with the French police in the peer-reviewed Journal of
21 Forensic Science (see Pham-Hoai, Emmanuel, M.S., Crispino, Frank, Ph.D., M.Phil. and
22 Hampikian, Greg Ph.D. Journal of Forensic Sciences, Volume 59, Issue 3, pages 816-
23 819, May 2014). I have been qualified by the courts as a DNA expert in Colorado,
24 Connecticut, Georgia, Idaho, Indiana, Maine, Michigan, Montana, Ohio, Pennsylvania,
Texas, Utah and Virginia; and I have worked on criminal cases involving DNA in all 50
US states, Canada, England, France, India, Italy, Ireland, Liberia and Taiwan.

- 1 6. I am familiar with Cybergenetics, and its TrueAllele software. TrueAllele is a
2 probabilistic genotyping computer system that interprets DNA evidence using a statistical
3 model. I am familiar with several TrueAllele validation studies that have established the
4 reliability of the method and software.
- 5 7. I have used TrueAllele analysis to form my opinion in two cases where other methods
6 proved futile. Both of these involved complex mixtures. Both cases were for claims of
7 wrongful conviction where manual DNA analysis by accredited crime laboratories had
8 been inconclusive. In both cases TrueAllele was successful at determining probabilistic
9 genotypes.
- 10 8. We have never requested the source code for the TrueAllele software. I do not believe
11 the source code is necessary for determining the reliability of TrueAllele, because I have
12 never checked source code for any of the dozens of programs used in my laboratory.
- 13 9. While other experts may indeed require source code to validate their laboratory methods,
14 I do not know of any accredited forensic laboratory that requires source code for
15 validation.

16
17 Under penalty of perjury under the laws of the State of Washington, I certify that the
18 foregoing is true and correct to the best of my knowledge and belief.

19 Signed and dated by me this 1st day of April, 2016, at Boise, ID (location).

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21 
22 DR. GREG HAMPIKIAN