

1 A Yes. Stephen Flatley looked at that camera before me.

2 Q Did the Government ask you to testify here today and  
3 create another report instead of Stephen Flatley?

4 MR. DEROHANNESIAN: Objection.

5 THE COURT: Overruled, you may answer.

6 A Yes.

7 Q Why?

8 MR. DEROHANNESIAN: Objection.

9 A Where --as ITS forensic examiners, we -- as senior  
10 examiners we're in demand so we go all over the globe. We're  
11 in constant usage, I guess you would say, and right now  
12 Stephen Flatley is out on assignment in Ghana. So he's not  
13 able to be here because he's on operation.

14 Q Is that why you created another report very recently with  
15 respect to the camera?

16 A Yes.

17 MS. HAJJAR: No further questions, Your Honor.

18 THE COURT: Recross?

19 RE CROSS-EXAMINATION

20 BY MR. DEROHANNESIAN:

21 Q You agree that any metadata, whether it's EXIF data or  
22 other data can be changed and altered; correct?

23 A Yes, EXIF data can be altered.

24 Q And there's a variety of different ways that that can  
25 happen; correct?