September 29, 2025

DECLARATION IN SUPPORT OF MOTION FOR APPOINTMENT OF EXPERT

I, THOMAS GUZMAN-SANCHEZ, declare as follows:

I am a member of the Los Angeles Superior Court Expert Witness Panel.

On June 06, 2025 I was appointed to conduct audio forensic lab services for the defense (John Henry Yablonsky case #FVI900518). I was authorized to provide twenty (20) hours of non-testimonial services for the defense. I have proceeded to do the requested analysis, lab services and consultation. Additional analysis and production services are required for the completion of this appointment

I have prepared an initial preliminary report reflecting the results from phase one of the analyses, which is attached hereto as **EXHIBIT A.** I have also provided details of service provided and what is needed to complete the appointment, which is attached hereto as **EXHIBIT B.** I need to continue to phase 2 and 3 to complete the requested phonetic transcription and complete report to the Defense.

Based on the twenty (20) hours I've expended so far on this case for review, clarification and analysis, I am requesting the Court approve an additional twenty (20) hours of lab services and forensic production. This includes: phonetic transcription continued analysis, file authoring and preparation of the final report.

I declare under penalty of perjury under the laws of the State of California that the facts stated in the foregoing are true and correct.

Executed on this 29th day of September 2025, in Los Angeles, California.

By _____

THOMAS GUZMAN-SANCHEZ
AVF — Expert
GS Media Lab

Exhibit A — Preliminary Report:

Introduction And Summary

I am an audio and video forensics expert, and my area of expertise includes the science of both digital and analog video, film, and audio media including security/CCTV video.

Methodology:

I followed the exacting procedures required by the professional standards of the Scientific Working Group on Digital Evidence (SWGDE) applicable to this type of work. On June 06, 2025 I was appointed by Judge Zahara Arredondo to conduct analysis. I was directed to forensically analyze an audio file. I was asked to clarify audio and conduct phonetic transcription of the audio file. I received the digital media evidence from Naum Ware, P.I. for Mr. Yablosky.

Production Preparation:

I was asked to analyze key aspects of an audio file. In conducting this work I followed the professional standards of SWGDE applicable to this type of work. In conducting this analysis I used the following equipment and software:

    MacPro Mac OS X ver. 10.7.5

    Processor: 2.8 GHz Quad-Core Intel Xeon

    Memory: 3 GB 1066 MHz DDR3 ECC

    Graphics: ATI Radeon HD 5770 1024 MB

Digital Media Contents:

YABLONSKY Recorded Interview
- Dssl211E.exe
- Interview John Yablonsky (03-08-09) H #100-85.DSS
- InterviewJohnYablonskyInterview(03-08-09).mp3

File Meta Data Example (Invisor : Version 3.13 (887.190914)

	InterviewJohnYablonskyInterview(03-08-09).mp3
File	
Name	InterviewJohnYablonskyInterview(03-08-09).mp3
Size	264 MB (264062433 bytes)
Kind	MP3 audio
UTI	public.mp3
Location	/Volumes/PACE_PRVT-1/San Bernardino Submissions/YABLONSKY naum ware VICTORVILLE/ YABLONSKY Recorded Interview
Created	November 11, 2020 10:35:22 AM
Modified	November 11, 2020 10:35:22 AM
Container	
Format	MPEG Audio
Duration	3 h 40 min 3 s 121 ms
Overall bit rate mode	Constant
Overall bit rate	160 kb/s
Writing library	LAMEªª8x 4ðü>³Ý?¢`2ä
Audio	
Format version	Version 2
Format profile	Layer 3
Duration	3 h 40 min 3 s 121 ms
Bit rate mode	Constant
Bit rate	160 kb/s
Channel(s)	1 channel
Sampling rate	22.05 kHz
Frame rate	38.281 FPS (576 SPF)
Frame count	505432
Compression mode	Lossy
Stream size	264 MB (100.0%)
Writing library	LAMEªª8x 4ðü>³Ý?¢`2ä
Format	MPEG Audio

	Dssl211E.exe	Interview John Yablonsky (03-08-09) H #100-85.DSS
File		
Name	Dssl211E.exe	Interview John Yablonsky (03-08-09) H #100-85.DSS
Size	2.17 MB (2173358 bytes)	22.9 MB (22875648 bytes)
Kind	Microsoft Executable	Unix Executable File
UTI	com.microsoft.windows-executable	dyn.ah62d46dzqm0gw23ssz1gw8brqz6gn25zsvu0e5df hk2x43dxsq
Location	/Volumes/PACE_PRVT-1/San Bernardino Submissions/YABLONSKY naum ware VICTORVILLE/ YABLONSKY Recorded Interview	/Volumes/PACE_PRVT-1/San Bernardino Submissions/ YABLONSKY naum ware VICTORVILLE/YABLONSKY Recorded Interview
Created	February 20, 2019 9:20:42 AM	March 9, 2009 7:30:40 AM
Modified	February 20, 2019 9:20:42 AM	March 9, 2009 7:30:40 AM
Container		
Format	MZ	
Format profile	Executable / Intel i386	
Encoded date	UTC 2001-09-05 17:02:57	

Extraction:

The extraction technician for the files is unknown and there was no official extraction report included with this DME.

Extraction Details:

1) InterviewJohnYablonskyInterview(03-08-09).mp3

Created: November 11, 2020 10:35:22 AM

Modified: November 11, 2020 10:35:22 AM

Encoded & Tagged: None

2) Interview John Yablonsky (03-08-09) H #100—85.DSS

Created: March 9, 2009 7:30:40 AM

Modified: March 9, 2009 7:30:40 AM

Encoded & Tagged: None

3) Dssl211E.exe

Created: February 20, 2019 9:20:42 AM

Modified: February 20, 2019 9:20:42 AM

UTC: 2001-09-05 17:02:57

Verification Analysis:

The audio files appear to be from a digital recording device. The file was said to be an original byte-to-byte copy. The DME had no accompanying extraction report giving any details.

This title and verbal slate shows it was originally recorded **03-08-09**. Meta data information show that file 2 was created on March 9, 2009, which corresponds with the title and slate date. File 1 is a copy of the original file 2 created on November 11, 2020 10:35:22 AM. The file is a byte-to-byte copy of the original and appears to be intact.

Frame stills for analysis are PNG, which is best choice because a PNG file is not compressed and gives a true representation.

File Preparation:

The audio file sound wave imagery is from Izotope RX6. Images were not distorted prior to extraction. Using Screen Grab tool function, all still images were acquired directly from extracted audio images in a PNG format.

IMAGE CLARIFICATION
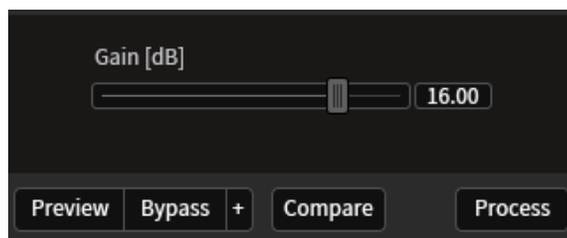
The audio file was imported into Izotope and clarified.
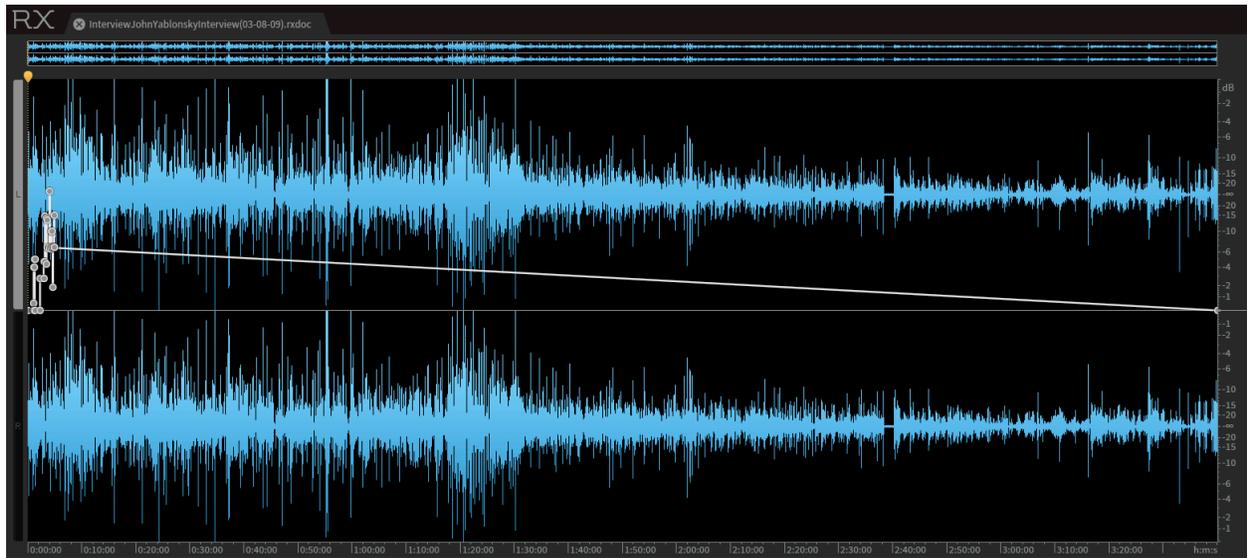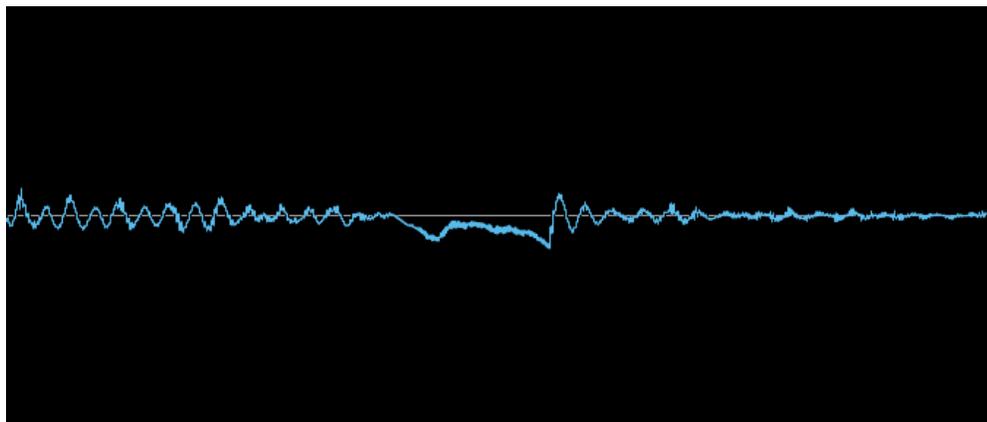

1) InterviewJohnYablonskyInterview(03-08-09).mp3

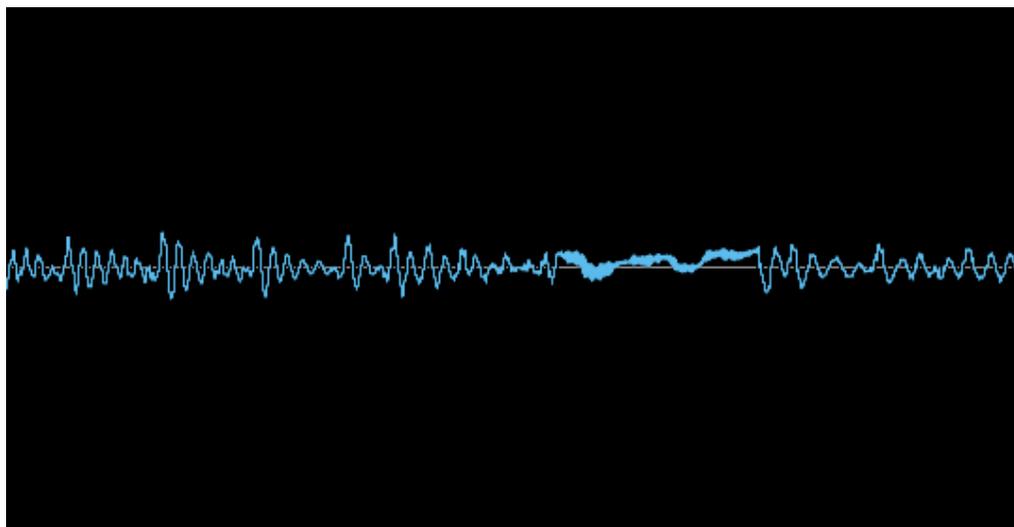**Phase 1 completed**

Filters applied:

Drop/cut examples from file:
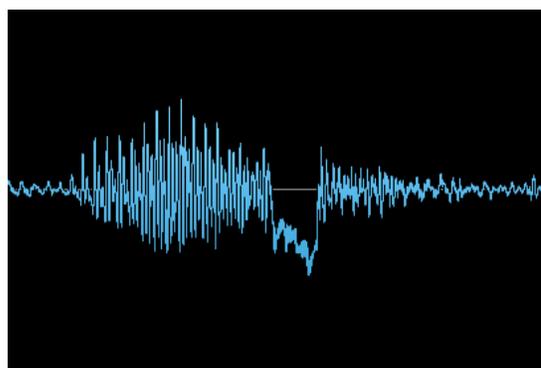
1) InterviewJohnYablonskyInterview(03-08-09).mp3
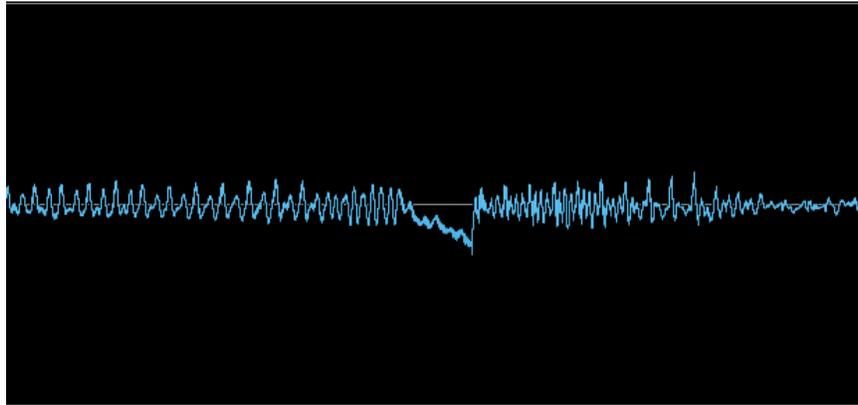

A) Drop/cut 00:04:05.328   ↑
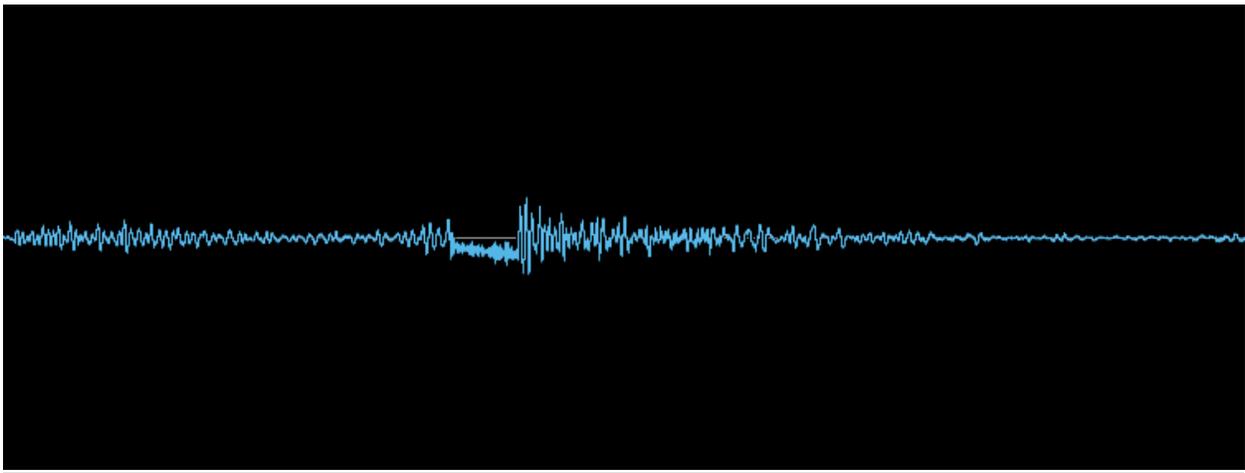

B) Drop/cut 00:04:56.684   ↑

C) Drop/cut 00:05:11.192   ↑

D) Drop/cut 00:05:36.863 ↑

E) Drop/cut 01:14:00.687 ↑

Preliminary Conclusion

Based on the digital media evidence I received, these are five of the many anomalies that were discovered in the recorded audio. These drop/cuts are abnormal due to how often they occur in the recording file. Phase 2 (which is complete clarification and analysis of recording integregrity of the 3 hour and 40 minute recording) and phase 3 (the phonetic transcription) needs to be completed before a final result of the analysis can be revealed.

Exhibit B – Details of Services:

6/24/25 – 5 Hours:
I received the digital media evidence. Verification of digital file and listening to the file in real time for content and integrity was started.

6/25/25 – 5 Hours:
Audio clarification began examination of the audio file for audibility. Began working in RX6 and applying spectral repair and EQ filtering.

6/26/25 – 5 Hours:
Audio clarification continued with examination of the audio file for audibility. Continued working in RX6 and applying spectral repair and EQ filtering.

6/27/25 – 5 Hours:
Audio clarification continued with examination of the audio file for audibility. Continued working in RX6 and applying spectral repair and EQ filtering. Completed phase 1 of clarification.

20 Hours:
The complete clarified file will be phonetically transcribed along with continued consultation with Mr. Yablonsky. All master files need to be rendered and outputted. An MP3 file needs to be authored for court presentation. A final scientific report needs to be completed and delivered to the defense.