

IN RE: CLEMENCY APPLICATION
OF TYRA PATTERSON

)
)
)
)
)
)
)

AFFIDAVIT OF ROBERT L. PATTERSON

I, RobertL. Patterson, under penalty of perjury and having been sworn to tell the truth, state the following:

1. I live in Clermont County and am the owner of Tri-State Polygraph Associates, Inc.
2. I have no relation to Tyra Patterson.
3. I have personal knowledge of the facts stated below and am of sound mind.

Professional Background

4. In 1993, I received polygraph training at the National Training Center of Polygraph Science in New York City. I completed 260 hours of formal classroom instruction in addition to a ten-month internship with experienced examiners at the Ohio State Highway Patrol General Headquarters in Columbus, Ohio.
5. I am a member of the Ohio Association of Polygraph Examiners, the Academy of Certified Polygraphists and the American Association of Police Polygraphists.
6. From 1971 to 1999, I served as a trooper with the Ohio State Highway Patrol.

7. In 1996, I opened my own polygraph business in Cincinnati, Tri-State Polygraph Associates, Inc.
8. I have conducted over 10,000 polygraph examinations during my career.
9. I have conducted examinations for over 100 local, state and federal law enforcement agencies, prosecutor offices and probation and parole departments, including the Ohio Adult Parole Authority.

GENERAL INFORMATION ON POLYGRAPHS

10. Polygraph examinations work through body sensors. There are five sensors used. The sensors measure the examinee's heart rate, breathing rate, sweating levels and general body movement.
11. Polygraph examiners first conduct a stimulation test that has nothing to do with the actual case to determine the examinee's normal body function. The stimulation test also determines the examinee's body reactions during deviations.
12. After the stimulation test, the real polygraph examination is administered. In criminal investigations, the polygraph examination usually focuses on a single issue.
13. The polygraphist usually asks a number of "pertinent questions." These questions are the ones that get to the heart of the issue being tested for. The polygraphist should ask between three and four pertinent questions.
14. In evaluating the polygraph examination, the polygraphist looks for the norms and deviations that were established in the stimulation test, focusing closely on the reactions and answers to the pertinent questions.

15. If there are no changes or deviations in reactions to the answers to the pertinent questions, the examinee is probably being truthful.

RELIABILITY OF POLYGRAPHS

16. I would say that polygraphs administered by a qualified examiner are at least 92% reliable.

17. If a polygraphist is well-trained and is actively conducting polygraph tests, the results are much more likely to be reliable.

18. There has been more research done on criminal investigation polygraph examinations than on polygraph examinations used for pre-employment screening purposes, so my opinion is that polygraphs used in criminal investigations are more reliable.

19. When an examinee is being truthful, their result comes up as "negative." When an examinee is lying, their result comes up as "positive." False negatives are much more rare than false positives.

20. Further, the sensor pad that we use prevents examinees from using "countermeasures" or trying to control their body reactions to manipulate the exam. The sensor catches all unnecessary movements, and its results are factored into the polygraphist's evaluation.

POLYGRAPHS IN TYRA PATTERSON'S CASE

21. I conducted polygraph examinations for Becca Stidham and Kellie Johnson.

22. Both Becca and Kellie were very forthcoming with their answers. They followed directions very well.

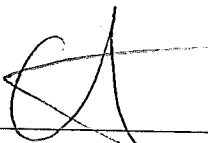
23. I did not observe any evidence of countermeasures being used by Becca or Kellie. The sensors would've definitely indicated a deviation if Becca or Kellie had been trying to use countermeasures. It was clear to me that they were not in any way using countermeasures.
24. In addition, Becca and Kellie's body language and non-verbal actions indicated truthfulness. They were leaning forward in their chairs while answering the questions and maintained eye contact with me when answering the questions.
25. I am absolutely confident that Becca Stidham and Kellie Johnson were telling the truth.
26. I am aware that other polygraphs were taken in this case. Specifically, I know that Don Clark and Frank Smith administered polygraph examinations to Tyra Patterson, Angela Thuman, and LaShawna Keeney and that James Hammes administered a polygraph examination to Joseph Letts.
27. I know Don Clark and Frank Smith well and consider them to be well-trained and qualified to conduct and interpret polygraphs.
28. I do not know James Hammes, who I understand is from Iowa.
29. I am aware that Tyra Patterson, Angela Thuman, LaShawna Keeney and Joseph Letts were all found to be truthful in their polygraphs.
30. The fact that all six of the examinees in this case passes increases the reliability of the conclusion that Tyra Patterson did not commit the

crimes for which she was convicted. The possibility that all six results were incorrect or "false negatives" is slim to none.

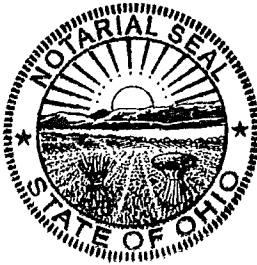


Bob Patterson

Sworn to and subscribed in my presence this 30th day of June, 2013, State of Ohio, Clermont County.



Notary Public



David A. Singleton, Attorney At Law
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date
Sec. 147.03 R.C.