

STATE OF MICHIGAN  
90th DISTRICT COURT

AFFIDAVIT FOR  
SEARCH WARRANT

CASE NO.

Police Agency  
Report Number: P96-21871

TRUE COPY

Jane Harmer, affiant, states that:

1. The person, place, or thing to be searched is described as and is located at:  
A home located at 112 Belvedere Avenue, more fully described as a white two story Victorian style home with a combination of lapp and cedar siding with an attached two car garage with two garage doors and a facade front door at an angle facing Hurbut Street in the city of Charlevoix.

2. The PROPERTY to be searched for and seized, if found, is specifically described as: any and all handwritten documents in the home including but not limited to written communications or notes, letters, canceled checks, business records, legal forms, applications or any other handwritten documents for analytical and comparative purposes.

3. The FACTS establishing probable cause of the grounds for search are:

Your Affiant is Jane Harmer. I am a Detective with the Boulder Colorado Police Department, and have been employed as so since January of 1992. I have been a police officer for the City of Boulder, located in the County of Boulder, State of Colorado, since January of 1986. I am currently assigned to the Family Crimes Unit within the division and have been working on the Ramsey Homicide since December 29, 1996. Being duly sworn, your affiant states the following:

I have personally spoken to Det. Jim Byfield of the Boulder Police Department and have reviewed his prior search warrant affidavit in this investigation with him. That search warrant was signed by Boulder County Court Judge Diane MacDonald on January 30th, 1997. The following is that affidavit:

AFFIDAVIT FOR SEARCH WARRANT

Your Affiant is Jim Byfield, currently assigned to the Detective Division with the Boulder Police Department. Your Affiant has been assigned to the Detective Division for two years and served as a Patrol Officer with the Boulder Police Department since January 5, 1981. After being duly sworn, Your Affiant states the following:

Through official police reports and conversations with other members of the Boulder Police Department, including commissioned officers Linda Arndt, Michael Everett, Rick French, Tom Trujillo and Larry Mason. Your Affiant personally learned the following from those officers:

On December 26, 1996, at approximately 5:52 a.m., Boulder Police Officers Karl Veitch and Rick French responded to 755 15th St., Boulder, Colorado, regarding a possible kidnaping. The residents of 755 15th St., John and Patsy Ramsey, informed the officers of the following:

The Ramsey's reside at 755 15th St., and are the parents of JonBenet Ramsey, who is six years old.

This morning at approximately 5:45 a.m., Patsy Ramsey discovered that JonBenet Ramsey was missing from the residence. JonBenet was

(Det. Jane Harmer) personally spoke with Detective Linda Arndt and she provided me with the following additional information:

Detective Arndt stated she was present when numerous handwriting samples were collected from JonBenet Ramsey's immediate family members. These family members include: John Benet Ramsey, JonBenet's father; Patricia "Patsy" Paugh Ramsey, JonBenet's mother; and Burke Hamilton Ramsey, JonBenet's 10 year old brother. These handwriting samples were obtained on the following dates:

<u>DATE</u>	<u>PERSON COMPLETING SAMPLE</u>	<u>ITEM #</u>
December 26, 1996	John Ramsey	4 LKA
December 28, 1996	John Ramsey	1 LKA
December 28, 1996	Patsy Ramsey	2 LKA
December 28, 1996	Burke Ramsey	3 LKA
January 4, 1997	Patsy Ramsey	5 & 6LKA
January 5, 1997	John Ramsey	10 -13 LKA

These samples were sent to the Colorado Bureau of Investigation (CBI) laboratory for comparison to the reported ransom note. The handwriting expert at CBI is Chet Ubowski, supervisor for the lab.

The reported ransom note had been written in a printing writing style. Detective Linda Arndt had personally obtained and viewed a copy of the ransom note on the morning of December 26, 1996 and was later told by Detective Tom Trujillo that they took the note to CBI for comparison.

[REDACTED]

When Detective Arndt had met with John and Patsy Ramsey at their home on the morning of December 26, 1996 neither John nor Patsy mentioned that they had heard any noises after each of them had gone to bed. Patsy had made the statement to Detective Arndt, " Why didn't I hear my baby?"

Patrol Sgt. Paul Reichenbach had been at the scene of the reported kidnaping of JonBenet Ramsey on the morning of December 26, 1996. Detective Arndt had personally met with Sgt. Reichbach on the morning of December 26, prior to arriving at the Ramsey residence. Detective Arndt had also personally reviewed the report completed by Sgt. Reichenbach and dated December 26, 1996. Sgt. Reichenbach states in his report that he had arrived at the Ramsey home at approximately 0600 hours on December 26, and that he had examined the exterior of the Ramsey home as well as the yard. Sgt. Reichenbach noted that the air temperature was approximately 10 degrees Fahrenheit. Sgt. Reichenbach noted in his report that there was a very light dusting of snow and frost on the exposed grass in the yard outside the Ramsey home. Some of the grass and yard was covered with snow from previous snowfall(s) and this snow was described as being crusty and measuring one - two inches deep. Sgt. Reichenbach states that he saw no fresh foot prints in any of the snow or in the frost on the grass. Sgt. Reichenbach also states in his report that he visually examined the exterior doors and windows of the Ramsey residence and found no signs of forced entry.

Detective Linda Arndt personally spoke with CBI Laboratory Agent Chet Ubowski on March 4, 1997. CBI Agent Ubowski is the laboratory agent in charge. One of his specialties is in the area of questioned documents. CBI Agent Ubowski provided Detective Arndt with the following information:

- \* Fred Patterson told Det. Harmer that Chet Ubowski told him that he had compared the tears at the top of the ransom note with the paper remaining on one of the note pads taken from the Ramsey home. From this Chet Ubowski determined that the note paper on which the three page ransom note was written had come from one of the note pads John Ramsey had given to Detective Fred Patterson on the morning of December 26, 1996. It was the same note pad that had three pages missing from the middle of it. On the page immediately preceding the missing three pages, the words "Mr. and Mrs. Ramsey" had been written with what appeared to be the same felt tip pen as the three page ransom note. Mr. Ubowski told Detective Patterson that he found indications that the writing on the page preceding the torn out pages was consistent with the handwriting contained in the three page ransom note. This note pad also contained other handwriting that was later analyzed by Chet Ubowski. This handwriting showed indications that the writer was Patsy Ramsey.
- \* The analysis of the handwriting samples obtained from John Ramsey showed "indications" that John Ramsey did not write the reported ransom note.
- \* The analysis of the handwriting samples obtained from Burke Ramsey showed that it was "probable" that Burke Ramsey did not write the reported ransom note.
- \* The analysis of the handwriting samples obtained from Patsy Ramsey showed "indications" which suggest that Patsy Ramsey may have written the reported ransom note.
- \* It would be helpful to obtain additional historical samples of Patsy Ramsey's handwriting so that a more conclusive determination could be made on the analysis of her handwriting compared to the handwriting contained in the reported ransom note.
- \* CBI Agent Ubowski informed Detective Arndt that samples of Patsy Ramsey's handwriting which had been completed prior to December 26, 1996 might not include or contain any elements of distortion, attempts to disguise handwriting, or nervousness. Agent Ubowski further stated that these handwriting samples would help to "display a full range of the variation of the writer". Since the handwriting of the reported ransom note was done in a printing style, it was suggested that "primarily printing" samples of handwriting be obtained.
- \* CBI Agent Ubowski had been present when a third handwriting sample had been obtained from Patsy Ramsey on February 28, 1997. The handwriting was completed in a standard block style. [REDACTED] Agent Ubowski stated that the handwriting samples obtained from Patsy do not suggest the full range of her handwriting.

[REDACTED]

I personally spoke to Det. Tom Trujillo of the Boulder Police Department, who informed me that he

submitted medical records from JonBenet's doctor to CBI. Dr. Francisco Beuf is the pediatrician who was JonBenet's doctor. Detective Trujillo told me that contained in these medical records were handwriting completed by Patricia Ramsey. These were logged in as #49TET on 01-10-97.

I personally spoke to Det. Barry Hartkop of the Boulder Police Department, who informed me that on Dec. 31, 1996, he collected a note book with printed handwriting from the Ramsey house in Boulder, Colorado. This is logged as #37BAH.

All of the above handwriting was reviewed by CBI Agent Chet Ubowski. He determined that there is evidence which indicates the ransom note may have been written by Patricia Ramsey, but "the evidence falls short of that necessary to support a definite conclusion." I personally spoke with Agent Ubowski by telephone on March 4, 1997 and obtained this information. Agent Ubowski further told me:

On Feb. 28, 1997, Mrs. Ramsey completed another set of handwriting samples. These included copies of the ransom note twice and copying the London Letter. Mr. Ubowski was present at that time and stated that he again observed the same indications, but required handwriting in the form of historical writings.

Agent Ubowski told me that since people do sometimes alter their style of writing when giving handwriting samples, in order to draw a conclusion, he is requesting "non-requested", normal course of business standards, which would include, but not be limited to: written communications, letters, canceled checks, and other written correspondent. These types of handwriting, in his opinion, would better exemplify the full range of variation of the writer.

Detective Amdt said that approximately 16 pages of handwriting have been provided by Patsy Ramsey to the Boulder Police Department to date.

That handwriting analysis as a method for determining identity has been demonstrated to be scientifically reliable and admissible evidence in criminal trials.

On Jan. 8, 1997 myself and Det. Ron Gossage received a search warrant for the Ramsey residence in Charlevoix, Michigan and entered this residence to execute the search warrant. I personally recall observing handwritten documents throughout the home. These handwritten documents were also observed by Charlevoix City Police Chief Dennis Halverson who accompanied Gossage and I on the search. Some of the handwriting I recall seeing inside the home includes telephone numbers and names and handwritten printing on a legal sized pad located in the master bedroom. Through personal experience, I believe that examples of person's handwriting are often found in their homes. The historical non requested handwriting samples sought are necessary and are possible corroborative links in the chain of evidence for resolution of the issue of criminal responsibility for the homicide of JonBenet Ramsey.

The Ramsey residence is more particularly described as a white two story Victorian style home with a combination of lapp and cedar siding with an attached two car garage with two garage doors and a lucie front door at an angle facing Hurlbut Street in the city of Charlevoix. Additionally, I have

obtained from the Charlevoix County Register of Deeds office a copy of a warranty deed dated December 23, 1992 listing John and Patricia P. Ramsey as the owners of 112 Belvedere Avenue, Charlevoix, Michigan.

I feel that it is reasonable to believe that historical writings completed by Mrs. Ramsey exist at the residence of the Ramsey Family at 112 Belvedere Avenue, located in the City of Charlevoix, County of Charlevoix, State of Michigan. I have personal knowledge that the home was purchased by the Ramsey's in 1992. The family renovated the property and has since used the residence as a summer vacation home. I have been informed by persons familiar with the Ramsey family that Mrs. Ramsey and her two children (Burke and JonBenet) lived at the home during the summer months of 1994, 1995 and 1996.



WHEREFORE, your affiant prays that a search warrant will issue to the Sheriff or any peace officer of the State of Michigan, according to the law of Michigan, commanding him or her to obtain from the Ramsey residence any and all handwritten documents in the home including but not limited to written communications or notes, letters, canceled checks, business records, legal forms, applications or any other handwritten documents for analytical and comparative purposes aforesaid, and to make return and tabulation thereof in accord with the statute in such case made and provided.

This affidavit consists of 15 pages.

[Signature] #530  
Affiant

Reviewed on 3-6-97  
by [Signature]  
Mary Beth Kur, Prosecuting  
Attorney

Subscribed and sworn to before me on 3-6-97  
[Signature]  
Judge Richard W. May

Copy of affidavit, warrant, and tabulation served on: \_\_\_\_\_  
 Name

Tabulation filed: \_\_\_\_\_  
 Date

- #1 (416 JEH) 13 RECIES CARDS; FOUND IN 2/10 KITCHEN SHELF
- #2 (417 JEH) UPPER DRAWER ON E. SIDE OF KITCHEN; DIRECTLY TO  
 THE SOUTH OF KITCHEN SINK:  
 a. Address book w/airbook cover  
 b. 5x8 legal pad
- #3 (418 JEH) PAPER TISSUE ON INSIDE OF KITCHEN CABINET (UPPER LEFT END)  
 5" x 5"
- #4 (419 JEH) TWO SMALL LEGAL PDS W/ LITERATURE - FROM <sup>SWAN</sup> DECK IN LIVING  
 ROOM / SOUTH WALL
- #5 (420 JEH) GREEN PAPER CLIP W/ PICTURES + PRINTED CAPTION  
 FOUND ON TOP OF STOVE - LIVING ROOM
- #6 (421 JEH) 2 PDS. OF PAPER FROM BED SIDE TABLE - MASTER BEDROOM
- #7 (422 JEH) 2 PDS. FROM WYOMING BUREAU
- #8 (423 JEH) 3 PDS. FROM KREWEON CAR BOARD