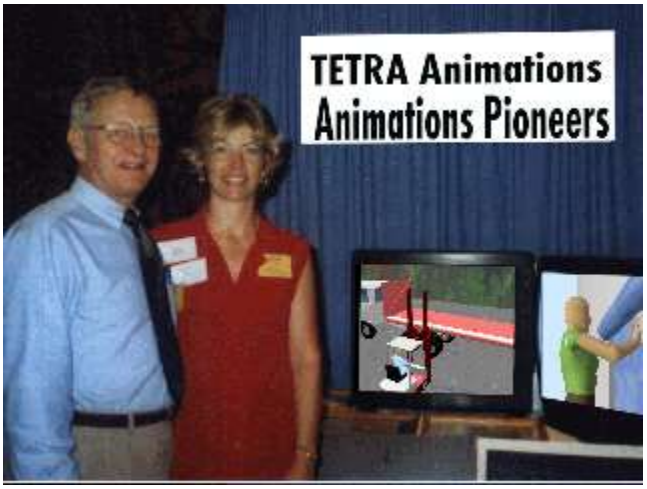

CV of Scott J. Taylor, CDP, Expert Animator of Accident and Criminal Reconstructions

864-288-1961, Email TrialAnimations@Charter.net, 1 Brynhurst Circle, Greenville, SC, 29615

Temporary web site https://www.seakexperts.com/members/11000-scott-j-taylor

criminal defense items are marked in purple below

Scott is likely America's most experienced overall animator and reconstructionist, who has been retained in: 278 cases, 38 states, 37 specialties, 25 testimonies, plaintiffs or defendants, **25 criminal cases**, in 27 years. He initially researched 9 "rules of evidence" books to pioneer writing the 1991 **judges admissibility questions** document for a **National Institute of Trial Advocacy** (NITA) presentation by attorney Kendall Few, which enabled first animations jury viewing in many states. He has 13 main summary qualifications:

1- He has been retained in 41 new cases since 2009 (including 5 Trucking and **5 Criminal Defense**).

2- His hourly fee is 39% less than non medical expert's 2019 averages, and more savings are in #11 below.

3- 36% of cases were repeats animations for attorneys or experts in prior cases, in his 2009 study.

4- Scott was honored for the invitation to write a paper suggesting American Judge's animations admissibility questions, based on 12 Law books of "Federal Evidence Rules" precedents, for Attorney Kendall Few to present live to the National Institute For Trial Advocacy (NITA), annual meeting in Keystone, Colorado. Kendall was awarded the Southern Trial Lawyers Warhorse Award, has been referred to as a "widely respected trial lawyer" by CBS 60 Minutes, and recognized as an automotive safety "Watchdog" by Automotive News.

5- 87% of his cases settled early (if finished 1 month before trial), and 9% "won" in trial, in his 2009 study.

6- Trucking cases were 61% of animations and reconstruction labor hours, as found in his 2009 study.

7- **IQ of 142** (=99.66% of the average population, 1 in 311 people), as qualified by a GRE Graduate Schools Records Exam. In comparison, average university students have 113 IQ, equal to 1 in 5. **The importance of IQ to attorneys is** in a Psychology Today article reporting- **comprehensive analysis of "dozens of studies with thousands of employees** in 191 different jobs" conclude "**cognitive ability accounted for more than 14% of job performance. Emotional intelligence accounted for less than 1%**." October, 2014. https://www.psychologytoday.com/us/blog/give-and-take/201410/emotional-intelligence-is-overrated

8- As a pioneer he testified for the 1st animations jury viewing in SC, and many other states.

9- He was qualified as an Expert for Animations of Reconstructions, in Federal, State, and **Criminal Courts**.

10- Clients have received large financial savings for cases, because,
- Depositions are seldom needed since his report or Affidavit explains how the animations agree with the evidence, reconstruction formulas calculations, and why different theories are improbable.
- To save the cost of visiting the accident or **criminal** site, he uses satellite photos/measures, expert's reconstructions, police report, photos, local site people, depositions or statements, and diagrams.
- Most all attorneys postpone deposition costs until after an 87% of attorneys settle early (2009 study).

11- Return on investment usually returns costs several times over, many tenfold, and some greater.

12- Attorneys and experts in 38 states, report that **since they can see the accident**, they justify requests for more equitable early settlement amounts, enabling settling before trial, avoiding trial time, and trial risks.

13- Scott was honored twice by an invitation from Federal Judge G. Ross Anderson to present 15 animations with him in 2 CLEs, first at an Annual SC Trial Lawyers Convention at Hilton Head Island, where he stated **"Computer animation allows attorneys [and Experts] to convert witnesses' verbal testimony into dynamic, visual demonstrations capable of mentally transporting jurors to the scene. It is difficult to imagine a more effective tool (than animations) for enhancing your case presentation."** He also stated in a trial transcript- "**animation would show in approximately two minutes the... entire theory of the case and the testimony of the expert, along with that of numerous other eye witnesses which would otherwise probably take two days of trial time**." An American Bar Association study discovered that, "after three days...the combination of verbal and visual delivery of information is **remembered six times as effectively as verbal delivery alone.**"

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Next are Scott's achievements highlights, before he began his animations reconstructions career. **Documents of authenticity** are available to judges, of most test scores, IQ, evaluations, etc**.** At age 13 he became the **youngest Eagle Scout (by one year less than the 2nd youngest Eagle**) in a city of 72,000 people- and he passed 36 verbal exams. He started a business as breeder and seller of tropical fish, and moth's. He set the records for Jr. High School "push ups", and High School "rope climb". At age 17 he taught himself Scuba Diving and night underwater navigation. He was a YMCA Minnesota week canoe trips guide. His Purdue Engineering entrance test was **98% aptitude in Mathematics Formulations**. He scored **99% in Mathematics Usage on a Merit Scholarship Exam**. He learned **Purdue Engineering Physics, Mathematics, Operations Research, and A.I. Artificial Intelligence** (of Statistics, Simulations, Linear Programming, math models, CPM Critical Path Method, etc.). He invented a geometric method to optimize shop floor layouts, which was >96% accurate to Purdue super computer A.I.. He fulfilled his Fraternity positions as Pledge Class President, Pledges Trainer, Activities Chairman, Rush Chairman, Publicity Chairman, Big Brother for 5 pledges, as well as annual Waterfalls Dances Manager. He also was a Sailing Racing Team member, President of Purdue Skull and Crescent Activities Honorary Pledges, a member of both the Junior Intra Fraternity Council and Student Union, and owned/operated 2 concessions of Laundry and Cigarettes.

At age 22, Mr. Taylor scored an **IQ of "A" on an IBM employment IQ** PAT Programmers Aptitude Test for being hired. He tested into 2 NAVY schools, and in 11 months graduated from Officers School and Supply Corps School, and volunteered for an optional Navy "Supply Advanced Data Processing Course", of 16 hours = 3 hours university credit. His NAVY background investigation qualified as **"Top Secret Security Clearance",** and being an A.I. Cryptography Officer, paymaster with $2.6 million cash, winning as the defense attorney in defense of a sailor, and achieved "Lieutenant" rank (highest achievable in 3 years). Volunteered A.I. statistics to find the most efficient correction of the ship's parts inventory accuracy. **For the NAVY FBI, he proved who was a pay line criminal (with A.I. methods** of statistics, set theory logic, serial numbers, and computer results). He volunteered to program a computerized "Ship Decommissioning A.I. Control System".

He was twice evaluated on two Navy ships Vietnam duty as **"One of the top few" officers for promotion.** His first NAVY ship Captain's evaluations of him were, "**Taylor...eagerly studied and practiced**, **to complete all tasks to qualify for the title of "OOD Officer On Deck-** to navigate and drive our LST ship,

including difficult night stars navigation)."..."**The most important remembrance of Scott was his irrepressible enthusiasm and his ability to complete every task efficiently and completely, no matter how difficult. He eagerly took on tasks in addition to his normally assigned duties**." His second ship senior officer's evaluations of him included "**Taylor...personally designed, programmed, and produced an extremely sophisticated management system for the control of inactivation "** ..."**Taylor...had an article published** in the Navy Supply Corps Newsletter"..."**Taylor is an alert, intelligent young officer with an aggressive spirit seeking a worthy challenge"..."especially in ...computer programming"... "Potentially, he is ear-marked as a truly outstanding officer."** A quote from one of my computer staff's documents reads "**what a good officer...you were...always fair and reasonable. I do not recall anyone in our division saying anything uncomplimentary about you or complaining about a poorly made decision. You always tried to motivate us to do our best."**

He scored an **IQ of 142 (= 1 in 311 people),** on the GRE Graduate Schools Records Exam, in the Navy at age 26. By comparison, the average American university student has a 113 IQ equal to 1 in 5 people. Upon returning to IBM, **in his first IBM 7 weeks "Basic Computer Course", he was elected President, and tested #1 of 15 students** in exams and 3 programmings. He sold, installed, and grew his IBM applications showcases accounts, of O. R. & A. I. programs: statistics for 12 cafeteria's food cost controls by food type, statistical sales forecastings, CPM Critical Path Method in 5 construction companies, CPM consulting for construction of the Alaskan Pipeline, Linear Programming to optimize an oil refinery's profit, as well as most all Manufacturing and Distribution applications. He taught computer systems design programming courses in many client's companies. Over 6 years IBM promoted him to the highest title of "Senior Marketing Representative". In outside weekly 3 hour night classes he learned to qualify for a **Certificate in Data Processing** (like a CPA), in an exam by DPMA, that only 38% of people passed in 1976 ("Wikipedia CDP").

Beyond Purdue he attended the equivalent of well over 2.6 years additional classroom college education, from IBM, Navy, DEC, Wang, and AutoDesk. For **DEC** (Digital Equipment Corp.), he designed for Dupont a planned $36 million of DEC's process control computers in 12 cities, after he alone designed and built a Dupont prototype (secret until 2019), without plans, for a **parabolic solar collector which captured 74% of sun heat,** and built a multiplexor to read temperatures into his programmed Apple computer hot tub heating program. Then, with this prototype, he **designed and taught Dupont programmers a week course of "Programing Process Control". Corning (largest world Fiber Optics producer, high security)**, also bought his Process Control Systems for world wide installations. He was rated the highest of 28 Sales Representatives after 5 years, and was promoted to the highest title of "Senior Marketing Representative".

He was invited to join **MENSA** "High IQ Society" Board Of Directors (**his 143 IQ > 132 minimum**), and managed camping and scuba trips. He was **co-author of the book "Synergistic Treatment of Industrial Waste"** for a **Department of Energy Research Contract**, and designed/programmed the math A.I. models. He wrote an **A.I. article "Expert Help For Expert Systems"** for the **National Mensa A.I. newsletter- "Synapse"**. He programmed a prototype data base Laboratory Production Information System for a local company, and also a 72 reports data base comparative reporting system for an Association of 12 Jeweler's. He sold **21 installations of A.I. Expert Systems GURU programming** (**5 at Clemson University**), programmed Expert applications prototypes for some, and programmed an A.I. statistical sales forecasting system for a large Corporation. He has programmed in **14 computer languages for ~705 programs** in Accounting and A.I. Artificial Intelligence (Expert Systems, Statistics, Critical Path Method, Linear Programming, laptop client's life insurance actuarial screening with A.I., and A.I. LISP programming to maximize solar greenhouse heat. **He has programmed ~819 Accident Reconstructions Animations as of 2019.**

He enjoys adventurous decades of (annual Rockies skiing, backpacking, snowshoeing, trout fishing, horse camping), Rocky mountains climbing 3 times over 13,700' (47% of climbers turn back), 2 long trips of 30 days Rockies back packing and 21 days Canada canoe camping, 56 Scuba Dives globally to a maximum 170' depth, 4 Caribbean 1 week scuba spear fishing charters, and a VW RV for mountain biking and kayaking.

He researched 21 years, creating a private proprietary unshared encrypted A.I. health plan, and **from 7/17/2015 to 01/20/2019, health expert's new A.I. methods computed his health variables as decreasing in body age from 53 to 39 years old,** compared to A.I. of >1,978 people. His global research includes medical, blood, herbal, spiritual, psychologic, philosophic, exercise, security, A.I., and more.

His USAA bank (United Services Automobile Association, largest military bank) **Credit Score based on Experian is ranked "very good" at 742, and may qualify for better interest rates,** as of 7/1/2019.

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Below are Mr. Taylor's acccomplishments, satisfying Federal Rule 702 (Daubert) qualifications in "*any one or more*" of 5 categories about civil or criminal reconstructions: 1. Experience, 2. Skill, 3. Knowledge, 4. Education, or 5. Training. **He also complies with "Frye" requirements of Generally Accepted Analysis and Methodology for Animations of Accident Reconstructions.**

1A. Experience with 278 cases of Accidents Reconstructions Animations, in 14 vehicles specialties and 24 non vehicles categories, in 37 states. Before programming animations, each of his cases required a physics accident reconstruction first, based upon evidence of created formulas (of time, distance, position and velocity), sketching velocity/time graphs, timing scripts, constructing vehicles and people, and constructing a 3D CAD accident site with visual evidence like skids. Animations are dynamic moving visual demonstrations of all evidence and physics formulas, transformed to videos looking like every day juror's experience and easily understood. Usually there is a report of what was relied upon for the animations.
- **Heavy trucking-** ~20 cases, 61% of animations and reconstructions hours as of 2009, 6 described at my temporary trucking web site page @ https://www.seakexperts.com/members/11000-scott-j-taylor
- **Complex freeway multi-vehicle sequential accidents-** the most complex involved 5 trucks and 4 cars, for 11 impacts, whereas a simple accident has 2 vehicles and 2 impacts.
- **Cars and pickup trucks, not including heavy trucks** ~55 cases
- **3D crime scene reconstructions- of over 22 cases,** including 18 shootings with ~53 shots fired, 21 wall/window holes animation ballistic angles lined up, 3 cases involving police excessive force, also gunpowder spray, knifing, wire strangling, shotgun blast, shells ejection pattern, and an accidental shot.
- **Subtle night lighting involved in vehicle accidents-** ~15 cases,
- **Surprise of 3 compounded delays of vehicle driver's perception reaction time**- 1 case,
- **Motorcycles-** ~13 cases, **Whiplash neck & spine injuries-** using mathematics model for adaptation to cases, ~14 cases, **Vehicles and equipment products liability-** ~13 cases, **Explosions and fires**- vehicles and houses- ~12 cases, **Forklifts**- ~11 cases, **Pedestrian accidents-** ~9 cases, **Trains collisions with vehicles-** ~7 cases, **Rain/fog/snow/ice vehicle accidents- ~**6 cases, **Cranes and lifts**- ~5 cases, • **Driver obscured visibility due to foliage liabilities-** ~5 cases, **Electrocutions**- 4 cases- people, circuit panels, and explosions, **Vehicles vaults-** ~3 cases, **Riding lawnmower deaths-** 2 cases, medical malpractice, vehicle rollovers, falls from 2nd story, slip and falls, sailing failure to yield, flood of lowlands, Hurricane Hugo cottage waves damage, bicycle accident, nursing home inadequate care, sun glares, dog knocked toddler over, gyroscopic force leveraged vehicle tip over, NOA wind direction gaseous dispersion, saddle bag gas tank, hurricane trees behavior, and 2 Patent violations.

1B. Experience writing ~147 reports of what was relied upon for animations, about,
- Vehicles paths, accelerations, decelerations, rotations, speeds, principal direction of force, initial point of contact, delta-V (velocity), roadway markings, final at rest, crush damage, distances, times, visibility, etc.
- Night visibility distances, lighting, variables affecting lighting visibility, and night background photos.
- Night lighting national precedent for judges to qualify admissibility accuracy for animations.
- Whiplash occupant kinematics in front and rear impact injuries, applied in over 14 whiplashes.
- Foliage obstructed views, of trains, motorcycles, and vehicles.

1C. Experience • He was the only Reconstructionist for ~36 of ~149 trucks and vehicles cases.
- **His 1992 jury animations viewing, was appealed, and upheld by the "4th Circuit Appeals Court"**, setting precedent for the South Eastern states and all America.
- **His proven design of his first successful "Animations admissibility questions protocol"** was then used by him to obtain admissibility in GA, TN, and other states.
- **61% of billable reconstruction animations hours were in heavy trucking accidents (up to 2009)**
- **He is a "Malcomb Gladwell qualified expert with greater than 10,000 billable hours" as of 2009.**

1D. Experience Conducting 11 Experiments for Reconstructions-
- **Physics study of car window glass shatter dispersions**, with shattered glass spills out the top of the front passenger window, to obtain glass dispersion distances from the road edge.

• **Night lighting of animated accident, national precedent admissibility standard**
• **Physics headlight visibility distance experiment,** of when a car was visible at hill crest.
• **Night traffic experiment, to statistically determine the average location of 35 cars stopping and turning left into a gas station.**
• **Twilight sunset subtle night lighting experiment**, to photograph exact lighting luminance, hue, and saturation values of trailer visibility strips, and lights. The time matched time of accident relative to sunset.
• **Night reflectors and license plate visibility distance experiment.** This provided a reliable visibility distance, and a much more realistic and accurate animation view.
• **Photography and surveying experiment of foliage locations blocking visibility** of a train (warning signal lights mistakenly bagged), so animation foliage types and sizes matched exactly.
• **Photography experiment of visibility from a stop sign, of foliage blocking driver's vision.** The animation's driver view was then identically blocked by accurate sized foliage.
• **Night commercial district lighting photography, 3 sessions managed live by phone,** for accurate animations photographed backgrounds of what illegal J Walkers looked like running in front of cars.
• **Experiment of a hands held gyroscopic precession force model.** When jurors abruptly turned handles of a spinning child's bike tire, the tire tried to twist/roll at a ninety degree angle to the turn direction. This non obvious invisible powerful force, significantly contributes to rollover for "super lifted" trucks with large tires.
• **Physics experiment of a crane boom physical model to find average fall time and acceleration.**

2. Skills, Exams, Certifications, and Aptitude Indicators-
• **IQ of 142** (=99.66% of the average population, 1 in 311 people), as qualified by a GRE Graduate Schools Records Exam. In comparison, average university students have 113 IQ, equal to 1 in 5. **The importance of IQ to attorneys is** in a Psychology Today article reporting- **comprehensive analysis of "dozens of studies with thousands of employees** in 191 different jobs" conclude "**cognitive ability accounted for more than 14% of job performance. Emotional intelligence accounted for less than 1%**." October, 2014. https://www.psychologytoday.com/us/blog/give-and-take/201410/emotional-intelligence-is-overrated
• 99% aptitude in Mathematics Usage on the Merit Scholarship Exam.
• 98% aptitude in Mathematics Formulations on the Purdue Engineering entrance Exam.
• "Top Secret Security Clearance", after passing a NAVY background investigation.
• He testified for 1st SC animations jury viewing, and many other states, as a qualified testifying Expert for Animations Reconstructions, in Federal, State, and Criminal Courts.
• IQ of "A" on an IBM employment IQ PAT Programmers Aptitude Test, for being hired.
• Passed the DPMA exam for a Certificate in Data Processing (like a CPA), that only 38% of people passed in 1976 (see "Wikipedia CDP"), by attending weekly 3 hour night classes.
• Invited to join MENSA "High IQ Society" Board of Directors (143 IQ > MENSA 132 minimum).
• At age 13 he qualified as the youngest Eagle Scout (by one year less than the youngest other Eagle) in a city of 72,000 people- and passed 36 verbal exams.
• One of countless examples of technical skill, was on a Navy carrier, where he used his A.I. to design a maintenance system of 98% planned computer up time, the highest reported world wide, starting at 61% without any instructions, and published the results in a NAVY magazine article, which is available for judges.
• He has programmed in 14 computer languages for ~705 programs in Accounting and A.I. Artificial Intelligence (GURU Expert Systems emulating expert decisions, Statistics, Critical Path Method, Linear Programming, laptop client's life insurance actuarial screening with A.I, and A.I. LISP programming to maximize solar greenhouse heat. **He has programmed ~819 Accident Reconstructions Animations as of 2019**.

3. Accident Animations Knowledge shared and demonstrated to attorneys in 12 meetings (usually CLEs, **4 Criminal Defense**), **an article printed in 8 state lawyers magazines, and 4 papers.**
• I am honored that Federal Judge G. Ross Anderson invited me to present 15 animations with him in 2 CLEs, first at an Annual SC Trial Lawyers Convention at Hilton Head Island, where he stated "Computer animation allows attorneys [and Experts] to convert witnesses' verbal testimony into dynamic, visual demonstrations capable of mentally transporting jurors to the scene. It is difficult to imagine a more effective tool (than animations) for enhancing your case presentation." He also stated in a trial transcript- "animation would show in approximately two minutes the... entire theory of the case and the testimony of the expert, along with that of numerous other eye witnesses which would otherwise probably take two days of trial time." An American Bar Association study discovered that, "after three days...the combination of verbal and visual delivery of information is remembered six times as effectively as verbal delivery alone."
• **He was honored by the invitation to be the pioneer to write 2 NITA papers suggesting American Judge's animations admissibility questions,** based on 12 Law books of "Federal Evidence Rules", for Attorney Kendall Few to present live to the National Institute For Trial Advocacy (NITA), annual meeting. Kendall was awarded the Southern Trial Lawyers Warhorse Award, has been referred to as a "widely respected

trial lawyer" by CBS 60 Minutes, and recognized as an automotive safety "Watchdog" by Automotive News.
• **He testified for 1st SC animations jury viewing, and many other states,** as a qualified testifying Expert for Animations Reconstructions, in Federal, State, and Criminal Courts.
• **His article was published in 8 state trial lawyers magazines**, about animations examples, case theory completion, expediting settlement, admissibility, ROI, and more.
• **2 accident reconstruction animations papers were written** for state and county CLEs.

4a. Relevant Education and Training- was from Purdue Engineering University, 36 credit hours which were equivalent to 1 year of 2 Purdue semesters. 1967 Bachelor of Science in Industrial Management (engineering math and A.I. statistics models applied to business), and minor of Quantitative Methods (computerized O. R. and A.I. math modeling), including:
• **Physics 152**, 4 hours credit, tested into advanced course (consolidating 6 hours course work). Including **Newtonian physics** used in accident reconstruction, acceleration/deceleration (of velocity, and rotations, rollovers), braking friction coefficients, momentum conservation, centrifugal force, etc.
• **Differential and integral calculus** 14 hours credit. Velocity = rate of distance change vs time, acceleration = rate of velocity change vs time, Momentum = mass x velocity
• **Mechanical drawing**- 3 hours credit. This course taught drawing to visualize 2D/3D perspectives, see how acceleration is the differential of velocity vs time, and velocity is the differential of distance vs time.
• **Engineering Science Aeronautical Engineering Statics and Dynamics 207,** 3 hours credit. Newtonian Physics of moving objects, resolving a force vector into components x, y, and z, over time. Engineering Sciences in Aeronautical Engineering, were the most difficult of available applied physics courses. He experienced proof of this course in his Rockies skiing at Jackson Wyoming, where his ability escalated from intermediate to an expert skier, by imagining skiing force vectors, tuned one by one, until just a few vectors controlled skiing an expert steep slope in a "white out" blizzard of only 3' visibility, only by feeling the forces.
• **Quantitative A.I. Methods of applied optimization and applied statistics**, 305 306, 6 hours credit. Course examples included industrial and electrical engineering, computer sciences, economics, statistics, and industrial engineering. Most all SAE physics research papers present statistical conclusions regarding perception reaction times, braking/acceleration times, night visibility, distance, witness speed. etc.
• **Statistics A.I.** - 6 hours credit. Reconstructions use in analyzing vehicles motions range of variability and expected value, to understand studies, of witness estimates inaccuracy (distance, speed, and time).
• **A.I. Artificial Intelligence programming-** in several courses on Purdue's CDC Control Data Super Computer, of statistics, CPM Critical Path Method, Linear Programming, Shop Floor Layout, and more.

4B. Education- Independent publications studies, explain methodologies for Frye qualification.
• **109 back issues of "Accident Reconstruction Journal",** 21 inches thick, gift from Expert Robert Taylor, Accident Reconstruction Experts manager, at the experts firm "Engineering Design and Testing"
• **"Traffic Accident Reconstruction fundamentals"**, 56 page book, gift from author, Expert Elvin Aycock
• **"Evidence In Traffic Crash Investigation and Reconstruction"**, 2006, 295 pages, $60, Amazon
• **"Expert Testimony",** $176 188 pages book from Amazon.com, rating 4.5 of 5
• **"Crash Reconstruction For Prosecutors"**, 31 pages
• **"Low-Speed Automobile Accidents: Investigation & Documentation**", whiplashes, 194 pages
• **"The Way Things Work (1 & 2)",** books for study of physics such as Gyroscopic force
• **"Gray's Anatomy",** study of body parts- for inserting X-rays into animations.
• **Many SAE Society Of Automotive Engineers papers about-** perception reaction time increases, inaccuracy of human estimates (distance, speed, time), whiplash, night visibility distance of people.

5. Training- • **5 days animations programming, by AutoDesk** (author of my animations software).
• **Accident reconstructionist apprentice in ~160 cases,** to study under many state's popular Expert Accident Reconstructionists, and specialized experts. They provided physics formulas advice (crush velocity reduction, skidding friction, acceleration, etc.). He recalculated all variables for reasonableness of interrelated vehicles timings, programmed motion, and adjusted smoothness appearance. • **Motorcycle expert accidents training-** of skid width vs braking intensity, by leading Expert and author. • **7 accident site investigations as an apprentice**, with qualified Experts to obtain measurements, elevations, photographs, and visual inspection of scrapes & skids. • **9 accident site investigations alone,** to obtain measurements.

Scott looks forward to starting programming Animations for your case Reconstructions.

Thank you,

Mr. Scott J. Taylor, CDP, was retained for 278 cases since 1992, in 38 states, and 25 testimonies