

**SUPPLEMENTAL AFFIDAVIT OF CRAIG S. CHAMBERLAIN**

Craig S. Chamberlain, being duly sworn, does depose and say that:

1. I am the same Craig S. Chamberlain who testified in August 1979 before the United States District Court for the Eastern District of North Carolina in the case of *United States of America v. Jeffrey R. MacDonald*, No. 75-26-CR-3.
2. In May 2005 I retired from 3M Corporation after being employed for 27 years as a research scientist, engaged in research in chemistry/physics at 3M's Corporate Research Laboratories, located in St. Paul, Minnesota.
3. I have a Bachelor of Science (B.S.) degree in Chemistry from California State University at Sacramento, a Master of Science degree in Chemistry (M.S.) from California State University at Sacramento, a Doctorate (Ph.D.) in Chemistry from the University of Illinois at Urbana, and a Bachelor of Science (B.S.) degree in Physics from Augsburg College at Minneapolis.
4. I have been a member of the following scientific organizations/societies: the American Chemical Society, the American Vacuum Society, the American

Association for the Advancement of Science, Pi Lambda Epsilon, Sigma Psi, Sigma Pi Sigma, and the 3M Technical Forum.

5. I have been awarded 23 United States patents in the field of chemistry/physics, with numerous associated foreign patents, and several pending United States patents.
6. I have published 5 papers in peer reviewed scientific journals and 2 papers in trade journals.
7. I have received the 3M Circle of Technical Excellence Award (Corporate and Divisional levels) as well as other 3M awards for my work in the field of chemistry/physics.
8. In 1969, while a graduate student at California State University at Sacramento working toward my M.S. Degree in Chemistry, I was drafted into the U.S. Army. At the time of my induction I had completed 8 units of graduate work toward my M.S. degree.
9. Following basic training at Fort Ord, California, I was assigned as a chemist to the United States Army Criminal Investigation Laboratory (USACIL), Fort Gordon, Georgia. Upon arrival at USACIL I was given a six month intensive course in forensic science, which included instruction in the collection and analysis of blood stains.

10. On February 17, 1970 I was part of a team of USACIL personnel deployed to Fort Bragg, North Carolina, in order to process the MacDonald crime scene located at 544 Castle Drive. I was not present when Colette, Kimberly and Kristen MacDonald were autopsied at Womack Army Hospital on Fort Bragg.
11. On February 21, 1970, prior to departing Fort Bragg, North Carolina, and returning to USACIL, I received from CID Special Agent Bennie J. Hawkins, numerous items of evidence that had been collected at autopsy from the MacDonald victims. Included within this category were 13 plastic vials, marked "BJH 17 Feb 70" and reported to contain fingernail scrapings, hair samples, fibers and vaginal smears taken from the victims at Womack Army Hospital by Major George Gammel, and Captain William Hancock. See Exhibit 1, Item 1, attached.
12. As reflected on Exhibit 1, Item 2 was described as a "Plastic container containing hair samples of 3 year old victim, Christine McDonald (sic), marked BJH, 17 Feb 70". Although I subsequently learned that the victim's name was actually Kristen MacDonald, for some period of time I was under the misapprehension that her first name was "Christine".
13. Upon returning to Fort Gordon, Georgia, with the evidence that had been collected at Fort Bragg, between February 17-21, 1970, I assumed the duties of

custodian and coordinator within the Chemistry Section of USACIL. By this statement I mean that, in addition to performing serological testing of suspected blood stains, I would distribute items to other USACIL chemists for their serological analysis or other examinations, including USACIL Department of Army Civilian (DAC) Chemist Dillard O. Browning.

14. In view of the number of suspected blood stains recovered from the crime scene, four chemists from the USACIL Chemistry Section were assigned to test the stains for the presence of human blood, and if possible, to determine which of the four ABO blood groups was present. Those chemists, in addition to myself, were DAC Janice S. Glisson, and Military Police Corps Specialists Larry Leonard Flinn, and Terry Lee Laber.
  15. For the purpose of note taking and report listing, suspected blood stains were given the prefix "D" followed by a number. For example the bloodstained blue pajama top was designated as "D-210".
  16. DAC Chemist Dillard O. Browning, was not tasked with conducting serological examinations, but rather was assigned responsibility for the examination and comparison of hairs and fibers, which were generally given an "E" prefix followed by a number.
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17. On February 26, 1970, I recorded a number of alpha numeric "D" designations for exhibits D-232 through D-239 which were to be examined for the presence of ABO blood and other trace evidence, but not necessarily by me. I recorded these alpha-numeric designations in my notes in conjunction with the reported origin, or source, of the item to be examined. See Exhibit 2.
18. My notes for February 26, 1970 reflect that D-237 was as follows: Vial c/ fingernail scrapings marked "L. Hand Chris". The quotation marks appear in my notes. See Exhibit 2.
19. The use of quotation marks, and the word "marked" indicates that something bore the writing "L. Hand Chris", which contained the fingernail scrapings of Christine (sic) MacDonald. That exhibit D-237 was not described as a vial marked *fingernail scrapings L. Hand Chris*, but rather the exhibit was described as a Vial c/ fingernail scrapings marked " L. Hand Chris" indicates that the words "L. Hand Chris" were written on some surface (possibly a piece of paper) that was associated with the plastic pill vial.
20. As USACIL chemists determined the results of their serology tests of the "D" designated items, they recorded these results in their notes. These were later recorded on a color coded master chart so that the identity of the particular chemists performing one of the four tests then used to determine ABO blood group would be known. See Exhibit 9 attached.

21. In addition to the color coded chart which listed numerous "D" exhibits, the results, including those obtained by the other three chemists, for each "D" exhibit in numerical order were recorded on a single page. See Exhibits 3-8, attached.
22. My summary notes in relation to the results of the testing of exhibit D-237: Vial containing fingernail scrapings marked "L. Hand Chris" reflect that the results of the Crust test indicated the presence of blood. An examination of the color coded chart, however, reveals that I did not perform any chemical analysis or examination of the fingernail scrapings designated D-237, but rather such blood testing as was possible was conducted by DAC Chemist Janice S. Glisson.
23. Consequently, I have no personal knowledge of what constituted Exhibit D-237, beyond that reflected in my notes referenced above, nor do I have personal knowledge of any serological or chemical analysis performed on D-237, other than as reported on the color coded chart.
24. This affidavit supplements my prior affidavit of October 9, 2009, based upon additional documents that I have been furnished in the interim and asked to review.
25. I have been furnished copies of the documents filed on July 15, 2010 in the

"Government's Supplemental Appendix to Appellee's Supplemental Brief" at G.S.A.21-G.S.A.37 (Document 3 below) and on August 2, 2010 with the United States Court of Appeals for the Fourth Circuit as an Addendum to the Supplemental Reply Brief Of Appellant Jeffrey R. MacDonald (Document 108) in United States of America v. Jeffrey R. MacDonald, Case No. 08-8525, on August 2, 2010, and consisting of:

- (1) a two page DA- Form 19-31, Military Police Receipt For Property, marked SV-2-59- 70, from Detachment B, 3d MP Group (CI), Fort Bragg, North Carolina, pertaining to items received from the Pathology Department, Womack Army Hospital, Fort Bragg, North Carolina on February 17, 1970;
- (2) a one page inventory of evidence to be examined dated "26 Feb 70" and bearing my initials "CSC"; and
- (3) the Preliminary Laboratory Report Number FA-D-P-C-FP-82-70 of the U.S. Army Criminal Investigation Laboratory, Fort Gordon, Georgia, dated "6 Apr 70".

26. With respect to document "1" described in paragraph 25 above, it appears to be a redacted copy of a sub- voucher of voucher 59-70 which is attached as Exhibit 1 to this affidavit, and to my affidavit of October 9, 2009, and is addressed in

paragraphs 11-12 above, and in paragraphs 11-12 of my affidavit of October 9, 2009.

27. With respect to document "2" described in paragraph 25 above, it appears to be a copy of a document, partially in my handwriting,\* that I prepared on February 26, 1970, in which I recorded alpha-numeric designations for exhibits to be examined, but not necessarily by me, for the presence of ABO blood and other trace evidence which is attached as Exhibit 2 to this affidavit and as Exhibit 2 to my affidavit of October 9, 2009, and is addressed in paragraphs 17- 19 above, and in paragraphs 17-19 of my affidavit of October 9, 2009.

\* My use of the phrase "partially in my handwriting" above is to reflect the fact that the descriptions which follow the alpha-numeric designations "D-230" and "D-231", and the parenthetical phrase relating to those exhibits, are not in my handwriting. The alpha-numeric designations "D-230" and "D-231" which replace the same crossed out alpha-numeric designations are in my handwriting. With respect to the alpha-numeric "D-232" through "D-239" and the descriptions which follow those designations, both are in my handwriting.

28. I have been provided with a copy of Exhibit 1 to the Affidavit of Janice Glisson (Exhibit 10 to this affidavit), which appears to be a laboratory bench note reflecting Crust test results dated "9 March 70", in case P-C-FP-82-70, bearing



the initials "JSG". My attention has been drawn to the column of alpha-numeric designations "D-233" through "D-239" which appears in the lower right hand corner of Glisson Exhibit 1 ( my Exhibit 10) and in juxtaposition to the description of the items from Womack Army Hospital subjected to the Crust test. For example, the sample described on the left as "L. Hand Chris", which appears not to be my handwriting, is in juxtaposition to the alpha-numeric designation "D-237" on the right, which looks like it is in my handwriting. The alpha-numeric designations "D-233 through D239" also looks like the handwritten designations for the same alpha-numeric designations which appear on Exhibit 2 of this affidavit, and which I did write.

29. I have no present recollection in 2011 of having written the alpha- numeric designations D-233 through D-239 on the March 9, 1970 serology bench note. The absence of any alpha-numeric designations on the left hand side of the bench note for the 7 items described only by place of origin by the serologist ( e.g. "L. Hand Chris"), and the fact that both the alpha-numeric designations and place of origin descriptions found in my list of February 26, 1970 ( Exhibit 2 of my affidavit) reflect the combined total information of the left and right hand sides of Glisson Exhibit 1 ( Exhibit 10 of this affidavit), is consistent with the following inferences: Sometime between March 9, 1970, and the issuance of the CID Preliminary Laboratory Report of April 6, 1970 (Glisson Exhibit 12, Exhibit 11 of this affidavit) the serology test results for the items from Womack Army Hospital described by place of origin on the bench note were collated with

the alpha-numeric designations D-233 through D-239 reflected in my inventory list of February 26, 1970 (Exhibit 2 of this affidavit). The serology test results for the evidence examined on March 9, 1970 from "L. Hand Chris" are described in the CID Preliminary Laboratory Report of April 6, 1970, at page 7 under "Evidence Examined" as "D-237- Fingernail scrapings from left hand of Christine MacDonald", and at page 13, paragraph 20: "Examinations of the red brown stains of Exhibits...D-237...indicated the presence of blood. Further examinations were precluded due to the paucity of the stain."

Further your affiant sayeth not.



Craig S. Chamberlain, Ph.D.

Subscribed and sworn before me this...27.....day of...June, 2011.

