

Exhibit 16: Affidavit of Robert Poole

STATE OF TEXAS

COUNTY OF DALLAS

Affidavit

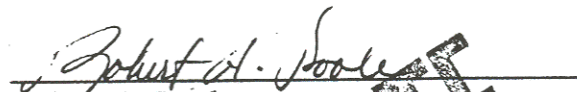
BEFORE ME, the undersigned official, on this day appeared Robert A. Poole, who is personally known to me, and first being duly sworn according to law upon his oath, deposed and said as follows:

My name is Robert A. Poole. I am over 18 years of age and I am fully competent to make this affidavit. I have personal knowledge of the facts stated herein, and they are all true and correct.


I am the Chief of the Physical Evidence Section of the Southwestern Institute of Forensic Sciences (SWIFS). SWIFS consists of the Dallas County Medical Examiner's Office and the Dallas County Crime Lab. The Crime Lab consists of the Drugs and Toxicology Section and the Physical Evidence Section. The Physical Evidence Section consists of the Latent Impressions, Forensic Biology, Trace Evidence Analysis, and Firearms and Toolmarks.

SWIFS and its constituent parts described above are independent entities from the Dallas County District Attorney's Office and the City of Rowlett Police Department. Our function is to provide independent, unbiased scientific services and testimony. Our work for non-county agencies such as the Rowlett Police Department (and any others requesting service) is on a fee-for-service basis. The Dallas County District Attorney and Rowlett Police Department (and anyone else) can only request that we perform services. They cannot dictate

methods used, nor do they control the outcome of the analysis. They do not have hiring or firing authority over SWIFS employees, or even input into those decisions. This was true in 1996, and it is true today.


Robert A. Poole

SUBSCRIBED AND SWORN TO BEFORE ME, on the 18th day of December 2002,
to certify which witness my hand and official seal.


Gail Crossland
Notary Public

