Good afternoon Will,

Give me a call when you get a chance, but to sum it up

i.   No one here has been certified an expert by any court on facial recognition.
ii.   The company Idemia, https://www.idemia.com/ , is the company that handles our software program for Facial Recognition and is the only one that can explain how the software works
iii.   I can tie everything together for you and explain as to why I believe they are one in the same person, to include my experience, which includes looking at up to 700 matches every morning and concluding whether it is a match or not. I haven't been wrong yet.

Let me know how you would like to proceed. Thanks

Respectfully Submitted,

Tpr. Danny Malhotra #3642
Massachusetts State Police
Division of Homeland Security and Preparedness
Fraud Identification Unit
10 Park Plaza 2nd Floor
Boston, MA 02116
danish.malhotra2@dot.state.ma.us
Office: (857) 368-9500
Desk: (857) 368-8622
Cell: (857)-324-0411
Fax: (857) 368-0649

From: Ryan, William F (SUF)
Sent: Thursday, February 28, 2019 3:59 PM
To: Malhotra, Danish (POL)
Subject: ▮▮▮▮▮▮▮▮, #2018-0H4-006420

Tpr. Malhotra,

Hope you are well. I am taking over from Helena Wong on this case. My apologies in advance for the repetition.

Thanks to you, we have a substantial amount of discovery, but Judge Horgan asked us – and seemed doubtful – whether we could prove this case at trial.

Based off your call with Helena, it seems that a number of his aliases were matched on the facial recognition software, he came in for an unrelated hearing, and was arrested. For trial, it would seem like we would need **(i)** a facial recognition expert who would be able to testify at trial to the different photos being the same person **(ii)** someone who might be able to explain how the facial recognition

software works (**iii**) you to detail the investigation and tie it all together.

Does that seem right to you? And are you aware of any experts that you have worked with in the past who might be able to serve in roles I and II above?

I'll be in and out of the office with limited access to email till next Wednesday, but hope to hear from you soon.

Best,
Will Ryan
Suffolk County DA's Office

Danish,

Thanks for laying it out. We'll inform the court, and submit that it should be sufficient for you to testify to your findings given your experience and conversations with the defendant and then proceed without a civilian expert. I'm out of the office next week, but happy to chat over the next few days if you think there's anything else I need to know before the 3/25/19 status date.

CC'ing my home email just for convenience.

Best,
Will R.

From: Malhotra, Danish (DOT)
Sent: Friday, March 08, 2019 2:23 PM
To: Ryan, William F (SUF)
Subject: RE: ▓▓▓▓▓▓▓▓, #2018-0H4-006420

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To: Malhotra, Danish (POL)
Subject: ██████████, #2018-0H4-006420

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