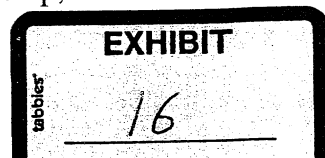

RYAN FERGUSON,)
)
 Petitioner,)
)
 v.) No.
)
 DAVE DORMIRE, Superintendent,)
 Jefferson City Correctional Center)
)
 Respondent.)

AFFIDAVIT OF DR. LARRY BLUM

Now comes your affiant, Dr. Larry Blum, and states under oath as follows:

- 1) I am a board certified forensic pathologist and have testified as an expert in numerous criminal prosecutions in Illinois, often for the State. (Attached as Exhibit A is a copy of my Curriculum Vitae). Of the 9,500 autopsies I have performed, approximately 10% have been homicides.
- 2) I have reviewed the above captioned case. Specifically, I have reviewed the autopsy report, crime scene and autopsy photographs and the trial testimony of the pathologist, Edward Adelstein, M.D.
- 3) Fractures of the hyoid bone are likely to occur with direct, concentrated force to the upper neck area which might consist of a blow with a hand or fist, a kick, a stomp, or bilateral compression with the hands as in manual strangulation.
- 4) Assault by a ligature, such as looping a belt around the neck, is an unusual and relatively rare cause of hyoid bone fracture due to the fact that the force to the neck is of a diffuse nature and generally not sufficiently concentrated to cause a fracture. It is highly improbable that the victim, Kent Heitholt's hyoid bone was fractured by the strangulation with his belt. It is more likely the fracture was caused by a blow with a hand or fist or a stomp, or bilateral compression with the hands as in manual strangulation.



5) Loss of consciousness following compression of the neck can take place in seconds, i.e. as little as ten seconds. With rapid release of the pressure, the person will regain consciousness. If the pressure to the neck is maintained beyond the initial safe period, the response of the brain is ischemia (oxygen deprivation) and edema (swelling). These changes can initiate irreversible brain damage and death. It is generally accepted that only a few minutes are required to cause death in this manner.

6) The absence of skull fractures would reasonably rule out a tire iron as the murder weapon.

7) Based on my review of the materials referenced above, it is my opinion, based on a reasonable degree of medical certainty, that the entire attack upon Mr. Heitholt, which resulted in his death, took only 5 to 10 minutes. The most likely sequence of events in this crime is that the victim was brought down to the ground by pressure on the neck resulting in a hyoid bone fracture with associated multiple blunt trauma. He was then struck repeatedly on the head, by the rear wheel on the driver's side of the car, and then he was strangled with his own belt.

8) Based upon the autopsies I have performed in homicides, it is my opinion that this murder was not motivated by a robbery. It is relatively rare to have a beating and strangulation murder motivated by a robbery. In my experience, a murder such as the Heitholt murder would be the result of a deep animosity on the part of the perpetrator towards the victim stemming from a personal relationship between the victim and perpetrator.

FURTHER YOUR AFFIANT SAYETH NOT.

Respectfully Submitted:

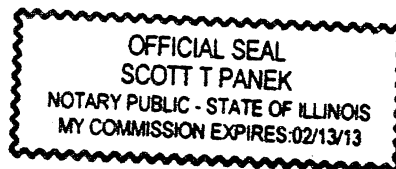
Larry Blum M.D.

Larry Blum, M.D.

SUBSCRIBED and SWORN to
before me this 8th day
of February, 2011

[Signature]

NOTARY PUBLIC



Curriculum Vitae 2011

Name Larry W. Blum, M.D.

Address 6812 Clovernook Road
Rockford, IL 61107

Phone 815-399-1114

Date/Place of birth October 9, 1944 in Lee County, KSB Hospital at Dixon, Illinois

Medical Degree M.D. from U. of Illinois, May 1976

Licensure Illinois; July 1980

Certification American Board of Pathology: Anatomic & Clinical (1981) and Forensic (1985)

Current activities Consultant for Illinois and Iowa coroners and medical examiners respectively; IDOC; FAA and private party consultations.

Academic Clinical Assistant Professor at Rockford branch of U. of Illinois Medical School in area of Forensic Pathology (1980 to present)

Education/Degrees Loras College, Dubuque, Iowa, B.S. Degree, 1966
St. Anthony Hospital, Rockford, Illinois, M.T. Degree 1973
U. of Illinois College of Medicine, Rockford, M.D. Degree 1976
Residency at Baptist Memorial Hospital, Memphis, TN. 1976-1980
Affiliate resident in Forensic Pathology, Shelby County M.E. Office, January 1, 1979 through March 31, 1979
Chief Resident, Baptist Memorial Hospital, Memphis, TN., January 1980 through June 1980

