

IN THE CLERK OF THE COURT OF COLE COUNTY, MISSOURI  
19<sup>TH</sup> JUDICIAL CIRCUIT

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

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**AFFIDAVIT OF DR. LARRY BLUM**

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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.

