

AFFIDAVIT OF JANE TURNER, MD, PhD

County of St. Louis City

State of Missouri

1. My name is Jane Turner, MD, PhD. I am of sound mind, am capable of making this affidavit, and am personally acquainted with the facts herein stated.
2. I am a licensed physician in the state of Missouri. I am a practicing forensic pathologist with certifications from the American Board of Pathology in anatomic and clinical pathology and in forensic pathology. I have during my 20 plus years of practice performed over 5000 autopsy examinations. I have attached my most recent C.V.
3. I was contacted by Leonard Taylor's attorney to do a preliminary review of Dr. Burch's testimony regarding the time of the victim's death in *State v. Taylor*, Cause No. 2104CR-5338 (St. Louis County Circuit Court).
4. Postmortem changes in the body are used in the practice of forensic pathology to estimate time of death. Rigor mortis is not present in a body that has been dead for more than a week.
5. The medicolegal death investigator of St. Louis County Medical Examiner's Office, Mr. Joe Lebb, documented the presence of rigor mortis in this case.
6. Postmortem changes present in a body that has been dead for more than a week may include skin marbling, skin slippage, desiccation of fingers and lips, desiccation of the body overall with decreased volume of blood, breakdown of blood (hemolysis), dissipation of body fluids in the eyes and urinary bladder, and breakdown of tissues (autolysis). Because Dr. Burch acknowledged that none of these findings were present in his examinations, his autopsy examination findings are more consistent with death having occurred within a few days and not 1-3 weeks later. The fact that the bodies were found in a house with a temperature at or around 50 °F and that the bodies were fully clothed and wrapped in blankets would not delay by 1-3 weeks most of these postmortem changes, including rigor mortis.
7. Although I need to perform a thorough review of the autopsy report, photographs, and related investigative materials, there is significant scientific probability that a full review would discredit Dr. Burch's trial testimony that the deaths could have occurred more than a week and as much as two to three weeks earlier.

8. The National Association of Medical Examiners published an administrative position paper in 2013 on the importance of medical examiner, coroner, and forensic pathologist independence.

Dated: Jan. 25, 2023

Jane W. Turner MD, PhD
Dr. Jane Turner, Affiant

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my official seal, this 25 day of January, 2022.

Terry Lynn Bixby
Notary Public

