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Attorneys for Respondent
RONALD J. RADKE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

BRITTANY FURLAN

Plaintiff,

vs.

RONALD RADKE

Defendant

Case No.: 26STRO00192

Hon. Kimberly Repecka
Department 65

**SUPPLEMENTAL DECLARATION
OF MATTHEW R. WALSH re:
EXPERT WITNESS TESTIMONY**

I, Matthew R. Walsh declare:

1. have been retained in this matter as an expert forensic digital investigator, and expert witness. I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.
2. I am submitting this supplemental declaration / expert witness report in light of Mrs. Furlan's latest providing of evidentiary matter as I believe new information has come to light which would assist the Court in their determinations. None of the information within this document invalidates the prior document, it is meant to augment it accordingly.

METHODOLOGY

The audio files were examined using waveform and bit-level analysis in a digital audio editor to identify signal artifacts, noise floors, and encoding characteristics.

INVESTIGATION

3. ANALYSES OF SUBMITTED EVIDENTIARY MATTER

4. **Disclaiming Evidence Existed To Make a Determination** - Mrs. Furlan publicly claimed she did not save any videos of the evidence. However, in her March 4, 2026 Declaration (“Furlan Decl.”) in (Furlan Decl. Exhibit 1, Walsh Decl. Ex. 1), she shows screen shots demonstrating the existence of videos posted to SnapChat by the catfish suspect. Mrs. Furlan also publicly stated she had not shared the conversations, however, she provides them in her evidence. These were the same evidentiary components I was resented in January, 2026 as part of my earlier analysis. (Ex. 2)

5. **The Video Evidence Contradicts The Conversational Evidence** - Mrs. Furlan contends her and Mr. Radke’s online relationship was “a secret”, a sentiment shared by the SnapChat user jub_tip; however, the evidence shows that this video alone, at the time, had over 101 views. This indicates it had significant longevity to amass those views and that it was not specifically meant for Mrs. Furlan but rather, a larger number of individuals as is typical in wide-net catfishing schemes.

6. **The Video Evidence Contradicts Mrs. Furlans’ Statements** - Mrs. Furlan contends that “*unlike a typical catfish, the person behind these accounts never asked for any money, pictures, nothing.*”. Her own evidence contradicts this statement as the SnapChat user’s videos to her are specifically referencing her not sending ‘nudes’ as

asked to do so. Mrs. Furlan openly admits that nude videos and images had in fact been shared (*“Radke and I began communicating regularly over Snapchat, sending both texts and videos that progressed both physically and romantically. We exchanged a number of explicit pictures and videos”*)

7. **Mrs. Furlan’s Statement That Explicit Material Cannot Be AI-Generated** – The statement is inconsistent with widely documented capabilities of deepfake technology. In fact, many celebrities constantly battle this very issue; which is routinely covered by Media outlets:

a. **“Nearly 4,000 celebrities found to be victims of deepfake pornography....**

They include female actors, TV stars, musicians and YouTubers, who have not been named, whose faces were superimposed on to pornographic material using artificial intelligence.” – (The Guardian, 2025)

b. **“Emma Watson, Scarlett Johansson appear in sexually suggestive deepfake**

ads against their will... Hundreds of deepfake ads showing Emma Watson and Scarlett Johansson in sexually suggestive videos were found on Facebook and Instagram after bypassing the platforms' safeguards. NBC News’ Steven Romo and Kat Tenbarge explain how deepfake technology can be exploited by bad actors.” – (NBC News, 2023)

c. **“Deepfake Porn Is Out of Control... New research shows the number of**

deepfake videos is skyrocketing—and the world's biggest search engines are funneling clicks to dozens of sites dedicated to the nonconsensual fakes.... At least 244,625 videos have been uploaded to the top 35 websites set up either

69 *exclusively or partially to host deepfake porn videos in the past seven years” –*
70 *(Wired Magazine, 2023)*

71 **8. Mrs. Furlan’s Evidence Clearly Shows The Phone Number Is Not Mr. Radke - In**

72 (Furlan Decl. Ex. 13), she shows a forgot password partial phone number of the catfish
73 suspect (Instagram user jub_tip). The forgot password clearly shows a two digit Country
74 code (known to be +66). The U.S.A has a Country code of just +1 (Walsh Decl. Ex. 3).

75 **9. Further in Exhibit 13, Mrs. Furlan shows only a select portion of a FastPeopleSearch**
76 **screen shot which she contends is (a) Mr. Radke’s phone number and (b) matches the**
77 **last two digits of jub_tip’s phone number, which again, are from different countries and**
78 **so they cannot be the same phone number. (Walsh Decl. Ex. 4)**

79 **10. All Relied-Upon Information from FastPeopleSearch is Incorrect - Mrs. Furlan**
80 **provided only a partial screen shot of the FastPeopleSearch site. The complete site**
81 **demonstrates inconsistencies with Mrs. Furlan’s contention that the phone number (626)**
82 **427-7287 belongs to Mr. Radke. In fact, none of the information is accurate on this site**
83 **and is user-reported. (Walsh. Decl. Ex. 5)**

84 **11. Audio Analyses of the Video(s) in Question Are Definitely Not Mr. Radke – In**
85 **(Walsh Decl. Ex. 6 - 10) I demonstrate deep-level audio analyses of the video file(s)**
86 **which clearly demonstrates that the audio is not human speech, but rather computer-**
87 **generated audio of Mr. Radke’s voice. In all of the examples shown, The Blue waveform**
88 **is the SnapChat catfish user, the Red Waveform is a random video from Mr. Radke.**

89 **12. The analyses reveals:**

- a. (Ex. 6) As the video begins, there is clear evidence of pre-roll silence (aka dead air). This is caused by (a) recording from a microphone being off until it detects speech (b) digital remastering or (c) digital computer generated audio.
- b. (Ex. 7) Mr. Radke's cell phone recordings do not contain pre-roll silence. In fact, the initial opening "silent" audio of Mr. Radke's recordings before he speaks registers at **-50 db**. Whereas, the Catfishers audio purporting to be Mr. Radke's voice is absolute silence, registering at **infinity**.
- c. (Ex. 8) Between spoken sentences in the catfish video, there is no white-noise, ambient room noise or "mouth sounds" such as breathing or various sounds typical when recording vocal audio. Without remastering, this will almost always be present in all recordings.
- d. (Ex. 9) Conversely, Mr. Radke's videos contain considerable white noise, room echo, lip smacking, breathing and ambient noise (potentially a ceiling fan)
- e. (Ex. 10) In the Catfish video, the audio is heavily **digitized and pixelated sounding**. Further, between words, phrases and sentences appears to be absolute silence, however, when analyzed closer, a clear yet minute visual pattern appears in the waveform.
- f. (Ex. 11) Bit-level analyses of the audio shows a clear pattern in the catfisher's silence. It is a perfect square waveform such as:



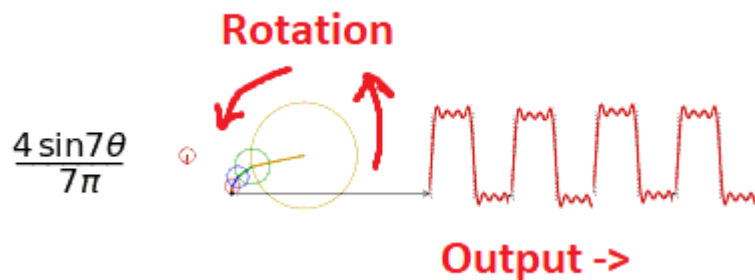
With a maximum amplitude of +32767 and a minimum of -32767 (oscillation of 7FFF,8000,7FFF,8000, etc.).

g. The bit-level analyses clearly demonstrates it is synthetic padding generated by a processing pipeline, not actual recorded silence.

h. The reasonings of which are well detailed, and I will instead defer to a scientific article published in 2016 “*AI-generated audio platforms can produce square waveforms as distinct synthetic sounds*” (Medium, Dec 20, 2016):

i. “*A pure sine wave is just a circle, where the radius corresponds to amplitude. Purer sounds are very round because they’re made of very few sine waves. Brighter sounds end up looking spiky because they have many frequency components and also **digital sound has limited resolution/is “pixelated”.***”

ii. As demonstrated in this graph below, mathematical functions in audio generation can occur by tracing a circle and plotting the Y-axis. As this occurs, a **square wave** is often synthesized where a natural recording would instead be made of a sinewave.



iii. In simple terms, the Catfisher used a voice changing software to mimic Mr. Radke’s voice. The reprocessing of that true audio turned the silence

noise in the Catfisher's recording; into a digitized/processed version
which instead of silence, produces a perfectly patterned square wave.

13. Voice Recordings of Mrs. Furlan Admit To Being Catfished – Provided to me in

evidence was a series of voice clips taken from an Instagram message in which the real Mr. Radke spoke authentically to Mrs. Furlan regarding the issue. The voice clips were tested using the same scientific methods and are genuine. The content of the messages includes an admission that Mrs. Furlan was aware at the time that she had been catfished. (Walsh Decl. Ex. 11)

a. **Mr. Radke:** *"Because, you're telling fuckin your husband that you saw my dick getting sucked, and that is – that is disgusting and it violates me, so please – I know its funny and its not...I want you to describe what this fools dick looks like; how big it was, please, please go on"*

b. **Mrs. Furlan:** *"I really don't wanna like argue with you anymore I'm really hurt, like I said I'm going through a lot in my marriage, um, yeah he sent me like a video of a girl with like black eyeliner sucking his dick and it was kinda curved, it had like, it kinda like curved down, it was probably about, I don't know 9, 8, 9 inches hard, and uh, yeah.. some girl with black eyeliner, and uhhhh, yeah, and of course like I said, I didn't screen record it, and I didn't fuckin like film it from another phone so everything goes away, obviously you don't have to believe me, I'm not tryin to fuckin – whatever... it's a catfish... and yeah"*

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Analyses and even simple review of the audio and video clearly demonstrates that it is in fact, not Mr. Radke and never was. I find no technical possibility that the audio present in the videos provided is Mr. Radke. The individual who created the videos and audio did so wholly independent of Mr. Radke and again, appear at this time to be a person of Thai nationality, domicile or having foreign or familial ties.

DECLARATION

Executed this 10 of March, 2025 in Santa Clarita, California

A handwritten signature in black ink, appearing to read "Matthew R. Walsh", is positioned above a horizontal line.

Matthew R. Walsh
expert-legal@winteryear.com

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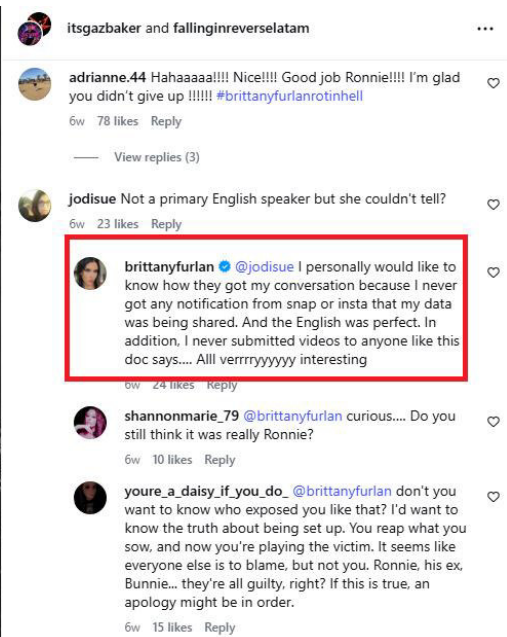
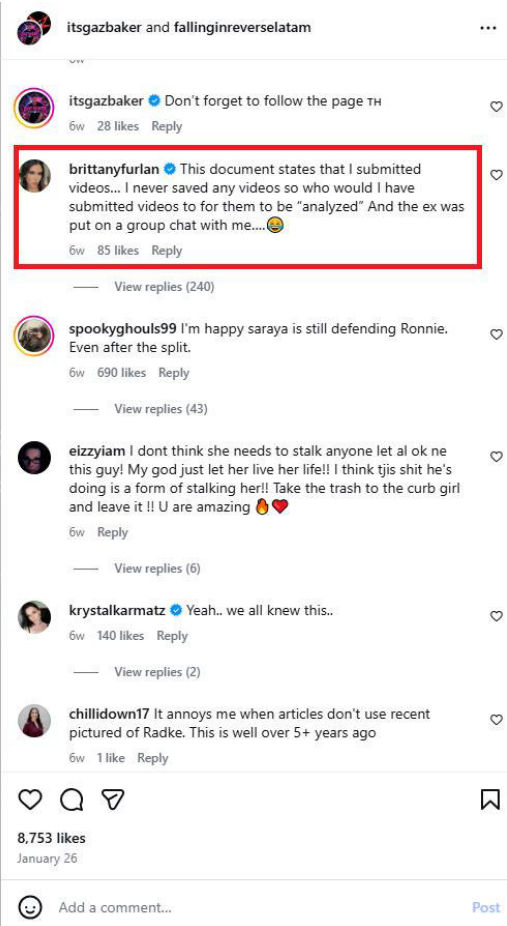
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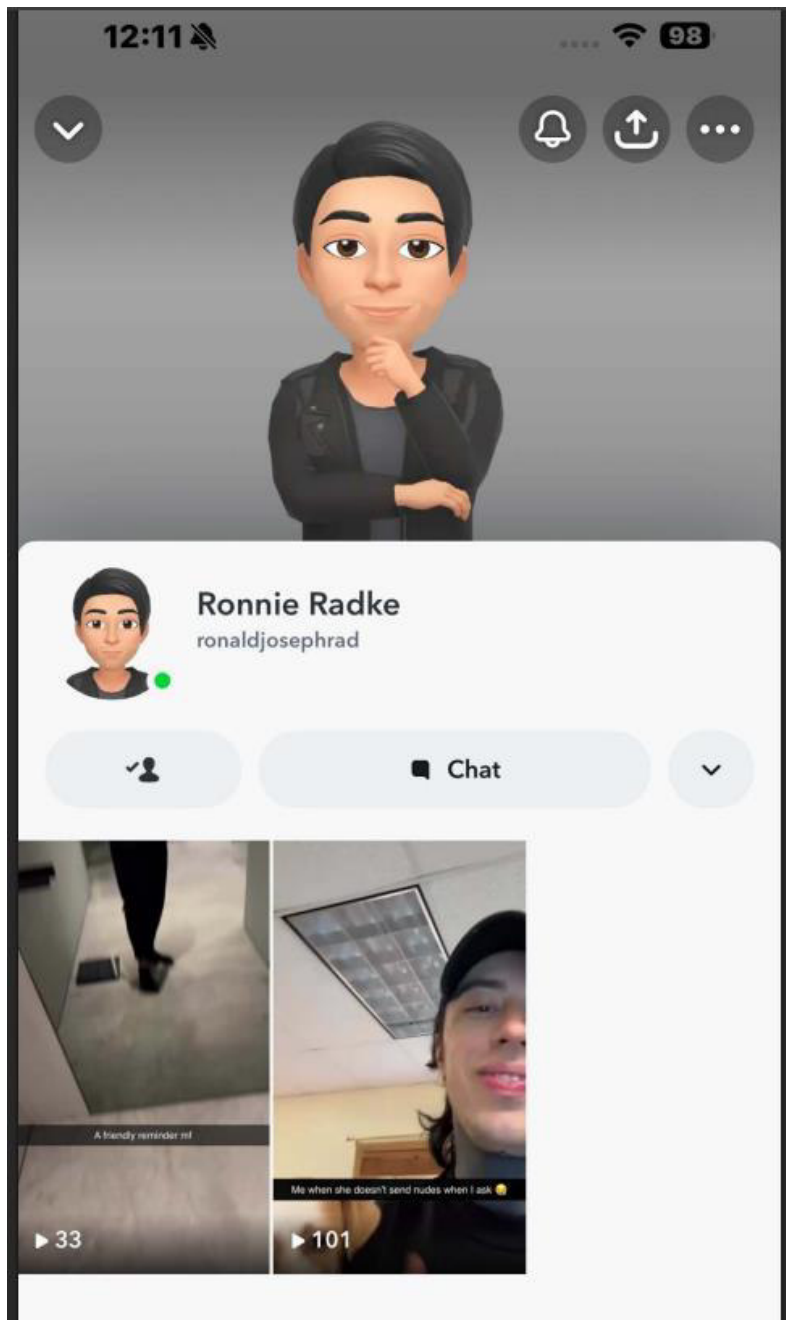
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EXHIBIT 1

Mrs. Furlan publicly claimed she did not save any videos of the evidence.



However, in her March 4, 2026 Declaration in Exhibit 1, she shows screen shots demonstrating the existence of videos posted to SnapChat by the catfish suspect.



In Exhibit 14, she in fact shows evidence of those conversations, of which were provided to me for analyses as part of the evidentiary package.

12:23 📶

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<  **jujib** >
jub_tip



Don't overthink it

Why are you screenshotting then? What would be the point of that if not something shady



Brit I don't want to be your secret

Or something to try and twist around. I wish you well. I have no bad blood. 🙌

That chapter is closed



Disappearing message...



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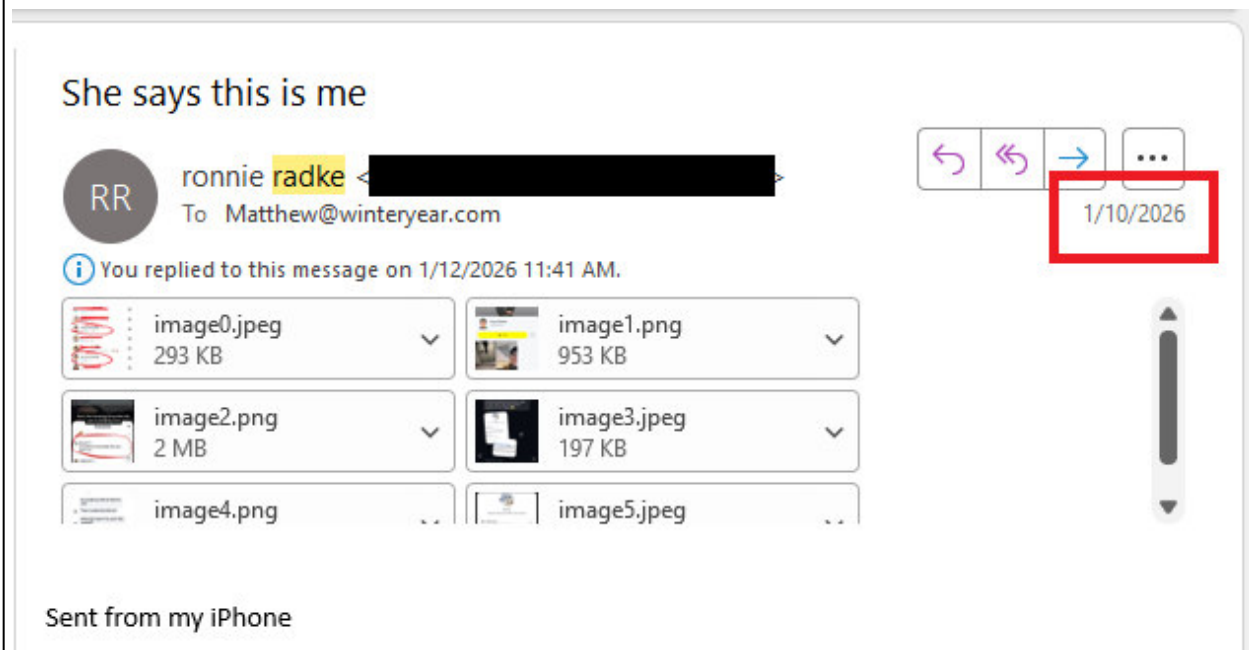
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EXHIBIT 2

One of the video's which I analyzed on or about January 10, 2026 was in fact a video from the same SnapChat account jub_tip as shown in Walsh Decl. Ex. 1 and Furlan Decl. Ex. 1



Continued on next page.

Mrs. Furlan contends her and Mr. Radke's online relationship was "a secret", a sentiment shared by the SnapChat user jub_tip; however, the evidence shows that this video alone has over 101 views indicating it was not specifically meant for Mrs. Furlan but rather, a larger number of individuals as is typical in wide-net catfishing schemes. Additionally, Mrs. Furlan contends that "unlike a typical catfish, the person behind these accounts never asked for any money, **pictures**, **nothing**". Her own evidence contradicts this statement as the SnapChat user's videos to her are specifically referencing her not sending 'nudes'.



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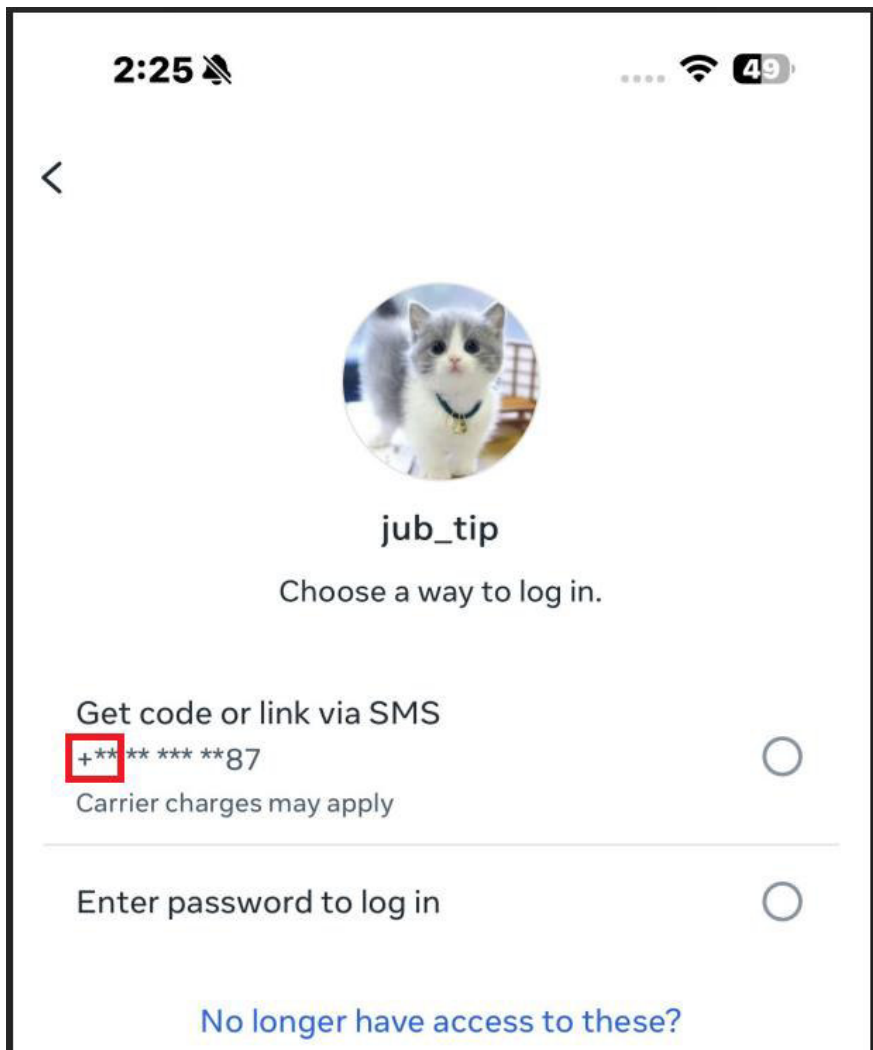
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EXHIBIT 3

In Exhibit 13 of Mrs. Furlan's evidence, she shows a forgot password partial phone number of the catfish suspect (Instagram user jub_tip). The forgot password clearly shows a two digit Country code (known to be +67). The U.S.A has a Country code of just +1



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EXHIBIT 4

Further in Exhibit 13, Mrs. Furlan shows only a select portion of a FastPeopleSearch screen shot which she contends is (a) Mr. Radke's phone number and (b) matches the last two digits of jub_tip's phone number, which again, are from different countries.



jub_tip

2-digit Country Code

(+66) Thailand

Choose a way to log in.

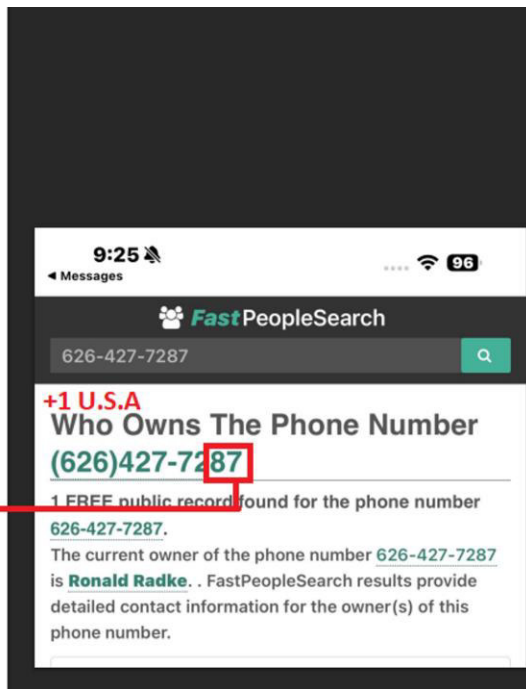
Get code or link via SMS

+*** **87

Carrier charges may apply

Enter password to log in

[No longer have access to these?](#)





jub_tip

Choose a way to confirm



CountryCode.org

<https://countrycode.org/thailand>

Thailand Country Code +66

The Thailand country code 66 will allow you to call Thailand from another country. Thailand telephone code 66 is dialed after the IDD. [Read more](#)



WhatsApp

Get code to +66 ** *** **87



Get code via Instagram notification
on devices where you're logged in



Password

Enter password to log in

[See more](#)



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EXHIBIT 5

Mrs. Furlan provided only a partial screen shot of the FastPeopleSearch site. The complete site demonstrates inconsistencies with Mrs. Furlan's contention that the phone number (626) 427-7287 belongs to Mr. Radke. In fact, none of the information is accurate on this site and is user-reported.

[Search](#) / [People](#) / [R](#) / [Radke](#) / [Ronald Radke](#) / [CA](#) / [Palos Verdes Estates](#)

Ronald Radke

in Palos Verdes Estates, CA (California)

Mr. Radke does not live in Palos Verdes

Age 42

Full Background Report (Sponsored)

- Arrests & Criminal Records
- Warrants & Police Records
- Felonies & Misdemeanors
- Nationwide Court Records
- Registered Sex Offender Check
- Bankruptcies, Judgements, Liens
- Marriage & Divorce Records
- Evictions & Foreclosures
- Properties & Assets
- Business Records
- Professional Licenses
- Social Media Records

VIEW FULL BACKGROUND REPORT »

Current Address (Since November 2020)

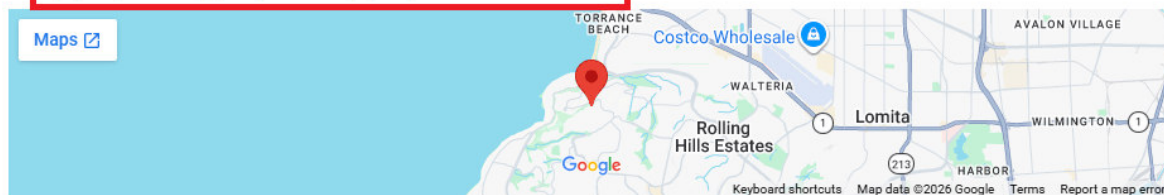
844 Rincon Ln
Palos Verdes Estates CA 90274

Los Angeles County

5 Beds | 9 Bath | 5,668 SqFt. | Built in 2008

Estimated Value	Estimated Equity	Last Sale Amount	Last Sale Date
\$8,260,000	\$8,260,000	\$6,500,000	2012-08-29

This is not Mr. Radke's home address





Phone Numbers

for **Ronald Radke** in **Palos Verdes Estates, CA**

(310) 988-1220

Landline

Bandwidth.com CLEC LLC

First reported June 2014

(626) 429-7297

Wireless

New Cingular Wireless PCS LLC

First reported September 2013

(702) 642-3706

Landline

Central Telephone Company - Nevada

First reported August 2010

(213) 309-1659

Wireless

New Cingular Wireless PCS LLC

First reported November 2018

**Not one of these
phone numbers
belong to Mr. Radke**

(626) 427-7287

Landline

Bandwidth.com CLEC LLC

First reported July 2013

**Mrs. Furlan claims this is Mr.
Radke's number, it is not.**



Full Background Report (Sponsored)

- Arrest Records
- Police Records
- Search Warrants
- Court Records
- Criminal Records
- Bankruptcies, Liens, Judgements
- Birth & Death Records
- Marriage & Divorce Records
- Current & Past Contact Info
- Addresses & Phone Numbers
- Family Members
- Neighbors & Associates
- Property Ownership
- Businesses
- Public Records
- Background Check

[VIEW FULL BACKGROUND REPORT](#)



Email Addresses

for **Ronald Radke** in **Palos Verdes Estates, CA**

radkeronnie2@gmail.com

This is not Mr. Radke's e-mail address



Also Known As

Ronald Radke

Ronald Radkey

Mr. Radke is not hispanic.

Ronaldjos Radke

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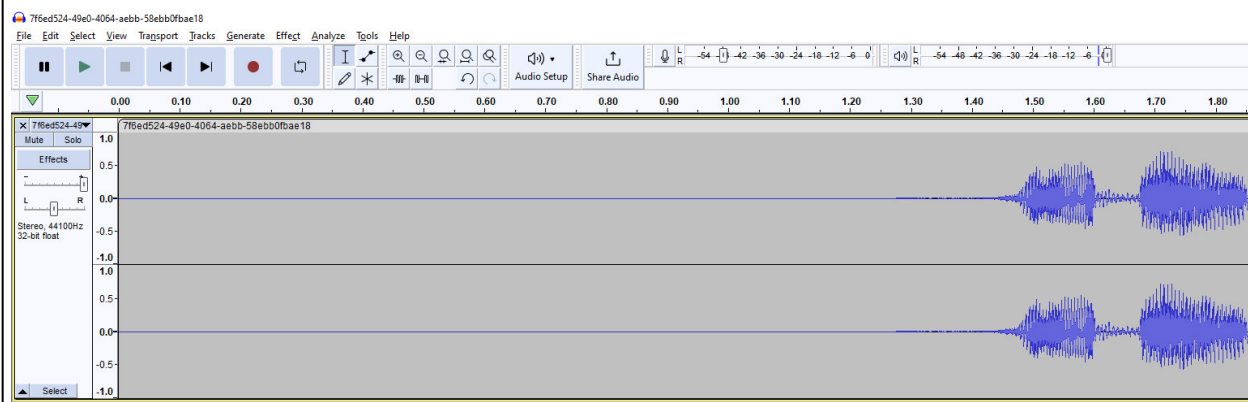
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EXHIBIT 6

Audio analyses of the video file(s) provided clearly show silence between spoken sentences and other interesting artifacts. The Blue waveform is the SnapChat catfish user, the Red is a random video from Mr. Radke.

This is pre-roll silence (or dead air). This is caused by (a) recording from a microphone being off until it detects speech (b) digital remastering or (c) digital computer generated audio



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EXHIBIT 7

As shown here, Mr. Radke's cell phone recordings do **not** contain pre-roll silence. In fact, "silent" audio of Mr. Radke's recordings registers at -50 db. Whereas, the Catfishers audio purporting to be Mr. Radke's voice is absolute silence, registering at infinity.

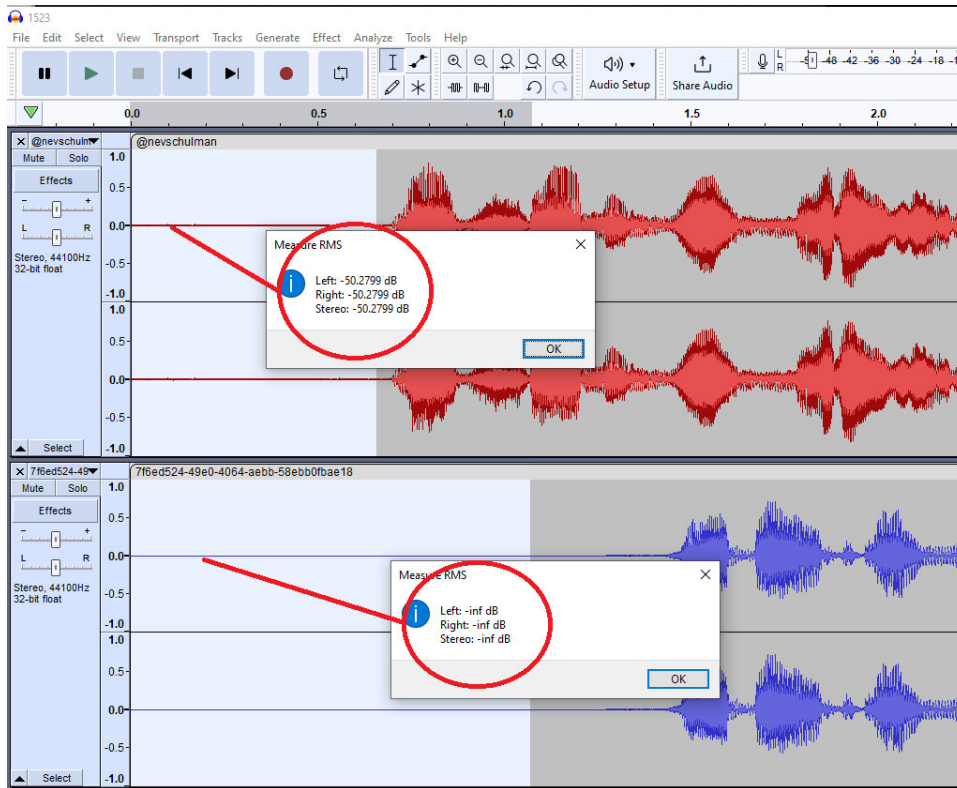
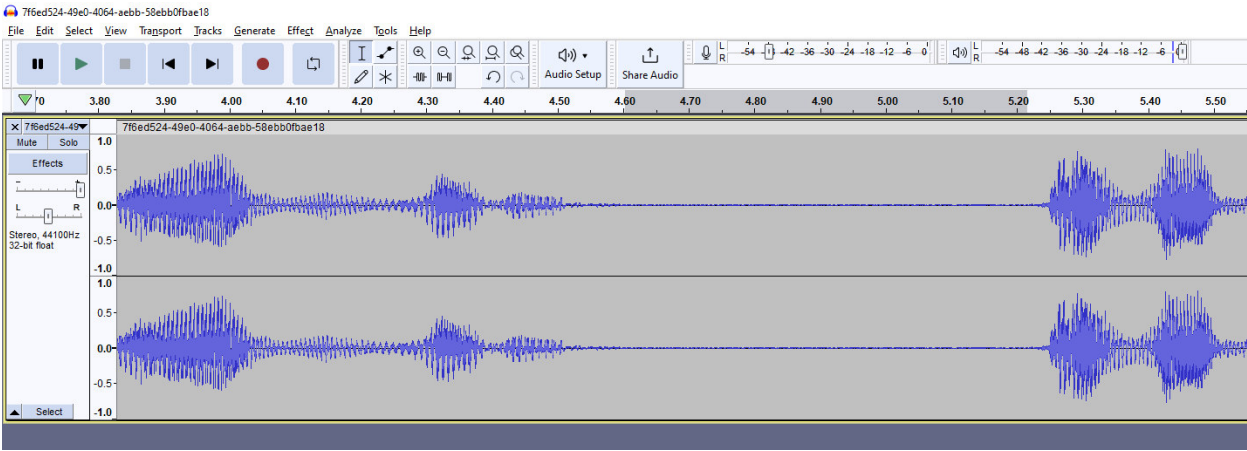


EXHIBIT 8

NO NATURAL AMBIENT NOISE

Between spoken sentences, there is no white-noise, ambient room noise or “mouth sounds” such as breathing or various sounds typical when recording vocal audio:



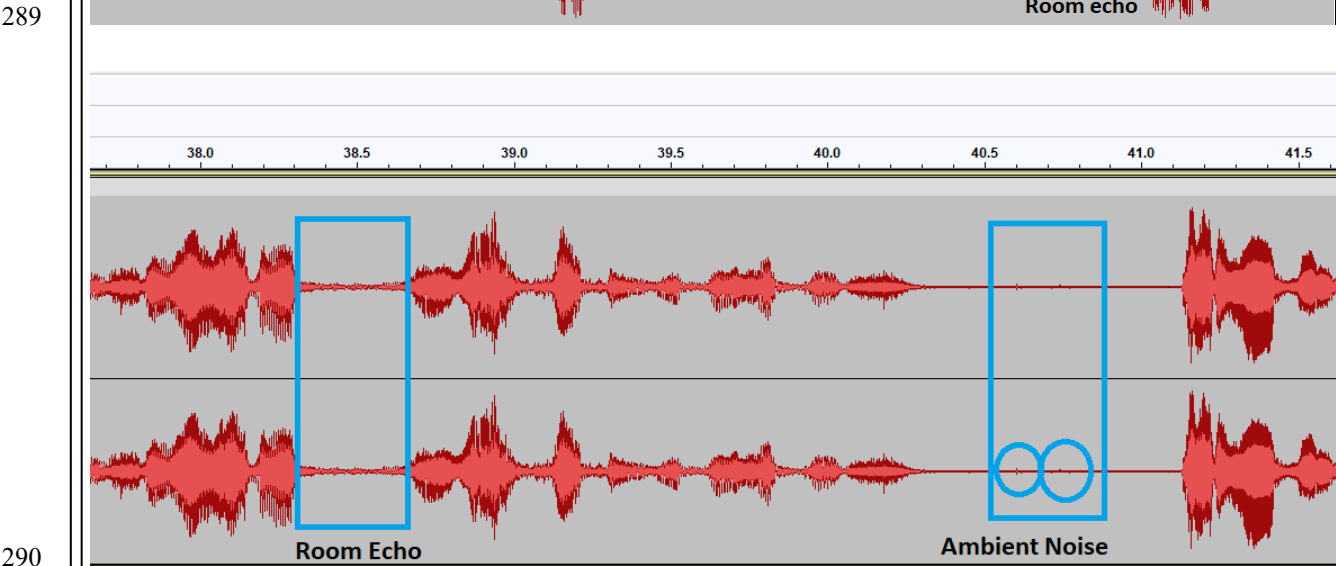
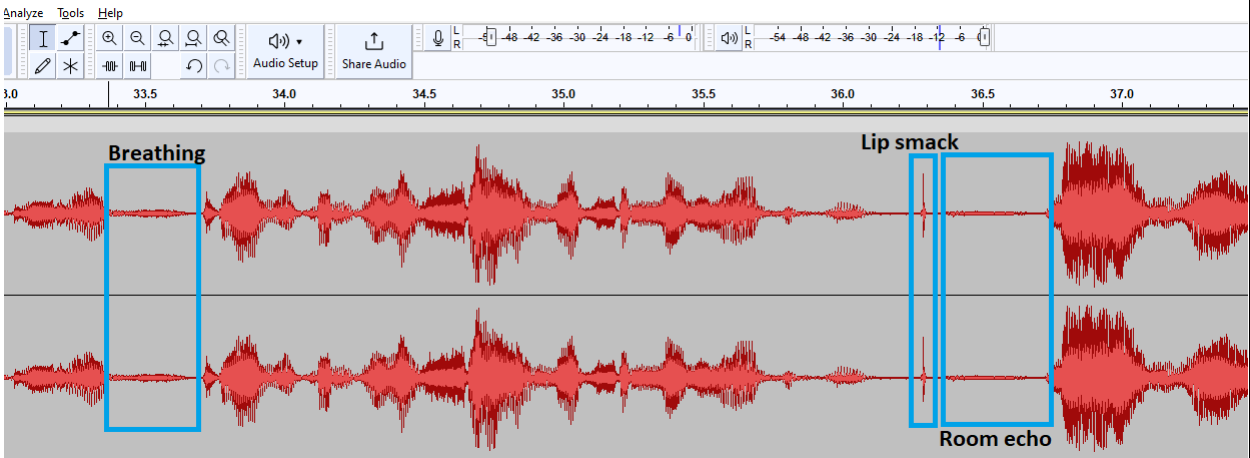
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EXHIBIT 9

288 Compare this to any one of Mr. Radke’s videos in the same room as pictured in the video.



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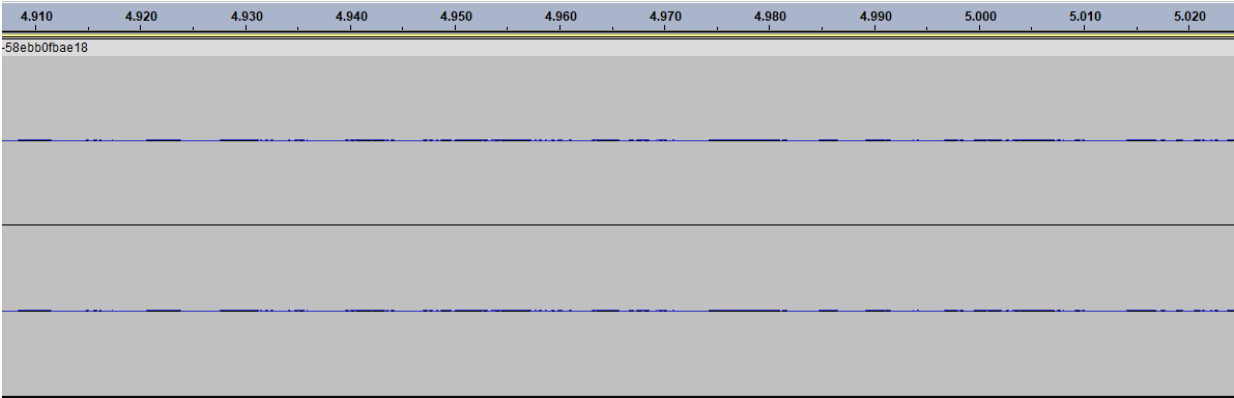
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EXHIBIT 10

298 **CATFISH AUDIO CONTAINS ENCODED FRAME PADDING**

299 Between words and phrases appears to be absolute silence, however, when analyzed closer, a
300 pattern appears.



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EXHIBIT 11

Authentic communications via voice between Mr. Radke and Mrs. Furlan demonstrate she admits to being Catfished



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