



June 30, 2014

Joseph R. Farris, Esq.

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Dear Mr. Farris,

Kivu Consulting, Inc. has been retained to assist with the analysis of forensic evidence in the matter of *In Re: Pedro Mario Burelli*. I reviewed the following documentation:

1. PDF report "Coup d'état and Assassination Plan Unveiled in Venezuela" issued by the Ministerio del Poder Popular para la Comunicación y la Información of Venezuela, dated May 28, 2014 ("the Venezuelan Government Report");
2. Subpoena from Pedro Burelli to Google, dated June 16, 2014;
3. Correspondence and Certification from Google dated June 27, 2014 in response to the subpoena;
4. Email header information from Google provided on June 27, 2014; and
5. Emails/headers provided by Pedro Burelli.

I make the following observations:

A. The "Emails" In the Venezuelan Government Report are Clearly Mock-Ups and Do Not Reflect Actual Screenshots

1. The Venezuelan Government Report purports to reflect seven emails, which are portrayed in the style of screenshots, along with related contact information. Although ostensibly screenshots of actual emails, the images themselves are mock-ups. I conclude this based on the following observations about the emails:
 - They have inaccuracies of format, coloring, and font size;
 - Icons, text and URL information overlap the edges of the supposed screenshots;
 - There are inconsistent or contradictory references to telecommunication carriers in the supposed signature blocks; and

- Analysis of pixilation and coloration shows that, in several of the supposed screenshots, email text has been added after the author of the report added highlighting effects (e.g. the red arrows explaining the sender and recipient).
2. The mock-ups show so many indications of user manipulation that they are clearly not copies of the original emails, edited for presentation in the Venezuelan Government Report. This level of user manipulation is more consistent with files that have been constructed from scratch.

B. Verified Records from Google Show No Evidence that These Emails Ever Existed

1. Of the seven emails in the Venezuelan Government Report, three were supposedly sent from the Gmail or the Google-hosted accounts of Pedro Burelli:
 - i. May 25, 2014 from pedro@burelli.com to Diego Arria at diego.arria@gmail.com;
 - ii. September 14, 2013 from pburelli@gmail.com to Henrique Salas Romer at 19xyvalezz61@gmail.com; and
 - iii. Sept 25, 2013 from pburelli@gmail.com to Henrique Salas Romer at 19xyvalezz61@gmail.com (in response to an email from 19xyvalezz61@gmail.com on the same day).
2. On June 16, 2014, Google was served with a subpoena requesting verified records with respect to the emails related to Pedro Burelli listed in the Venezuelan Government Report. Specifically, the subpoena called for the production of any emails sent between Pedro Burelli's Gmail and Google hosted email accounts and the alleged recipients of the emails during the relevant time periods (the subpoena sought emails for several days around the alleged time of the emails, which ensures that any differences in the time stamps on the email as a result of time zones would not result in Google failing to locate an email when searching by date.
3. Google's response, dated June 27, 2014, provided the header information (i.e. the information showing the routing of the emails through Internet nodes, the dates/times and sender/recipient information) of any responsive emails. **Based on my review of the verified Google records, there is no evidence of the existence of any emails between Pedro Burelli's Google email accounts and the alleged recipients on those dates.**
4. In its accompanying correspondence, Google confirmed that it searched the Google email accounts for both current/active email and also "recently deleted" email. From my experience of prior cases involving subpoenas served on Google, I understand that Google is often able to recover information related to emails deleted several months prior to a subpoena request. I also note that Google confirmed in the present case that Google "retains deleted emails for 30-60 days after they have been deleted by the user." Based on this information, I would have expected that, at a minimum, Google would have found a record of the email allegedly sent by

Pedro Burelli to Diego Arria on May 25, 2014, even if that email had been deleted immediately after being sent.

5. In theory, if the two emails allegedly sent in 2013 were deleted more than 30-60 days ago, they would have been purged from Google's system and Google would have no ability to recover records related to them. However, if Pedro Burelli had attempted to delete those emails immediately after the report issued on May 28, 2014, I would expect Google to have certainly found them as very recently deleted emails.

C. Verified Records from Google Confirm that a 2011 Email Exists Which Contains Lines of Text that are Identical to an Alleged 2013 Email from the Venezuelan Government Report

1. Pedro Burelli provided me with an email he sent to Henrique Salas Romer (at the email address h.salasromer@aya.yale.edu) dated June 28, 2011. In its response to the subpoena, Google confirmed that this email exists in Pedro Burelli's Gmail account, having been sent on the time and date reflected in the copy of the email provided to me.
2. This genuine email is significant as it contains several unique lines of text that are present in the alleged email from Pedro Burelli to Henrique Salas Romer shown at page 9 of the Venezuelan Government Report (supposedly dated September 14, 2013). However, the text highlighted in the Venezuelan Government Report (e.g. the reference to Emilio Cedeno) is entirely absent from the genuine 2011 email. Given the obvious manipulation of the supposed screenshots in the Venezuelan Government Report and the absence of any evidence from Google supporting the existence of the May 25, 2014 email, I strongly suspect that the alleged September 14, 2013 email is a fabrication based in part on text from the genuine June 28, 2011 email.

CONCLUSIONS:

1. The Venezuelan Government has presented only mock-ups. It has not provided actual copies of the alleged emails (in either paper or, preferably, digital format), the corresponding header information for the emails (showing the unique routing information for each email), or an explanation of how the Venezuelan Government obtained copies of the emails. It is impossible to authenticate the emails without such basic information.
2. By contrast, none of the verified evidence corroborates the existence of the emails in the Venezuelan Government Report. The images of the emails in the report are clearly mock-ups and contain a level of editing that is inconsistent with simple alterations for presentation purposes and more consistent with the complete fabrication of the emails. I would expect the verified records from Google to show *at least* the email from May 15, 2014 (even it had been deleted immediately upon sending), but the records show no trace that any of these emails ever existed. Further, there is an authentic email from 2011 that contains much of the text used in the one of the mock-up emails, which strongly suggests that text was "pasted" in to the mock-up from the 2011 email.

3. In sum, all of the objective, verified evidence is consistent with the falsification of the emails related to Pedro Burelli in the Venezuelan Government Report. If the Venezuelan Government does not offer evidence authenticating the emails, no objective forensic analyst could conclude that the emails referenced in the report are genuine.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Winston Krone". The signature is fluid and cursive, with the first name "Winston" being more prominent than the last name "Krone".

Winston Krone, Esq.