# STATEMENT OF WITNESS

(Criminal Justice Act 1967, ss 2,9/M.C. Rules, 1968, r.58)

Statement of : Jennifer Robinson

Age of witness (if over 18 enter 'over 18') : Over 18

Occupation of witness : Barrister

Address :

This statement, consisting of <u>4</u> pages signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

	Dated the	14 Pesevaer	_ 2019
Signed		·	
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Signature witnessed by			-

- I am a barrister at Doughty Street Chambers in London. I first represented Julian Assange as a solicitor in relation to WikiLeaks publications in 2010 and in the Swedish extradition proceedings. I have advised Mr. Assange and WikiLeaks on various legal issues since 2010, but do not address any matters which are subject to legal privilege. I have been asked to make this statement in relation to a particular meeting I observed in 2017.
- 2. On 15 August 2017, I was asked by Mr. Assange to meet with him at the Embassy of Ecuador in London. When I arrived, Mr. Assange informed me that

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a US Congressman had requested the meeting with Mr. Assange and he asked that I attend the meeting to observe. I am informed by Mr. Assange that he understood that the purpose of the Congressman's request for a meeting was to convey an offer that he wished to make in person.

- 3. As is now clear from the indictment, Mr. Assange had not yet been indicted in the US. At the time, we were not in a position to know this because any indictment would have been sealed. However, there was an ongoing criminal investigation and there had been reports of a sealed indictment. Mr. Assange had been granted asylum by Ecuador because of this and he remained in the embassy to protect himself from US extradition.
- 4. Congressman Dana Rohrabacher attended the embassy accompanied by Charles Johnson. Prior to the meeting, I had no notice that Mr. Johnson would attend the meeting and I didn't know who he was. Mr. Johnson explained that he was assisting the Congressman.
- 5. During the course of the meeting, Congressman Rohrabacher and Mr. Johnson made clear that they wanted us to believe they were acting on behalf of the President. They stated that President Trump was aware of and had approved of them coming to meet with Mr. Assange to discuss a proposal and that they would have an audience with the President to discuss the matter on their return to Washington DC.
- 6. Congressman Rohrabacher explained that he wanted to resolve the ongoing speculation about Russian involvement in the Democratic National Committee (DNC) leaks to WikiLeaks, which were published by WikiLeaks and other media organisations in 2016. He said that he regarded the ongoing speculation as damaging to US-Russian relations, that it was reviving old Cold War politics, and that it would be in the best interests of the US if the matter could be resolved. He and Mr. Johnson also explained that information from Mr. Assange about the source of the DNC leaks would be of interest, value and assistance to President Trump.

- 7. For context, consistent with WikiLeaks' stated editorial policy, Mr. Assange had not disclosed the identity of his source for those publications. At the time of the meeting, the investigation by US Special Counsel, Robert Mueller, into Russian interference in the 2016 election was underway and the alleged connections between Russia and President Trump and his election campaign team were the subject of the investigation.
- Congressman Rohrabacher and Mr. Assange talked about Mr. Assange's situation and the fact he had to remain in the embassy to protect himself from US indictment and extradition for his publishing work with WikiLeaks.
- 9. We discussed the clear free speech implications of any US indictment and extradition request for Mr. Assange for his publishing work with WikiLeaks. We also discussed the fact that the alleged source for the publications, Chelsea Manning, had already had her sentence commuted by President Obama. Mr Assange and I both attempted to make the case for them to raise this with President Trump to persuade him that Mr. Assange should not face prosecution on First Amendment grounds.
- 10. Congressman Rohrabacher raised and acknowledged the risk of Mr. Assange's exposure to US prosecution and explained that he had come to London to meet with Mr. Assange to talk about "*what might be necessary to get him out*". Congressman Rohrabacher presented what he described as a "win-win" solution, which could allow Mr. Assange to leave the embassy and "*get on with his life*" without fear of a US indictment and extradition request. The proposal put forward by Congressman Rohrabacher was that Mr. Assange identify the source for the 2016 election publications in return for some form of pardon, assurance or agreement which would both benefit President Trump politically and prevent US indictment and extradition.
- 11. The meeting was concluded on the basis that Congressman Rohrabacher would return to have a direct conversation with President Trump about exactly what would be done to prevent Mr Assange's indictment and extradition.

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- 12. Mr. Assange did not provide any source information to the Congressman.
- 13. After the meeting, both Congressman Rohrabacher and Mr. Johnson spoke to the media. Their reported statements to the media confirmed the specific proposal was that Mr. Assange would not face US criminal prosecution if he provided information about the source of the DNC publications to allow President Trump to put a stop to the Mueller investigation. I exhibit to this statement a collection of those media interviews.

Signed

Signature witnessed by ...

### PRIVILEGED AND CONFIDENTIAL – WITNESS 1

## Affidavit presented before notary public

With this affidavit I make myself available to the justice system, with the aim of cooperating openly in relation to some events that I have information about and by their contents may reveal unlawful activities. I wish to express that at no point have I intended to commit nor am I aware of having committed any unlawful activities myself. That is why I wish to make myself available to the justice system to ask it for protection and be granted the status of a protected witness given that, with this decision which I have taken freely, my family and I are put at risk with the information and documentation I am providing.

I have decided to provide this detailed statement as a result of recent events, specifically the detention of Mr Assange and the revelation of a criminal prosecution in the United States against him. With the revelation of a criminal case against him in United States I have come to realize that some of the events that I witnessed are relevant. Therefore, due to the events that have occurred recently, the revelation of criminal prosecution against Mr Assange in United States, I considered it important to make Mr Assange's defence aware of the facts that I am aware of and I believe to be relevant to them.

UC Global is a company that does security consultancy and training, whose owner, administrator and director is David Morales.

In reality UC Global started with meagre contracts and practically the sole contract was the one the company signed with the Government of Ecuador in October 2015. The contract encompassed security services for the daughters of the then President of Ecuador, Rafael Correa, a second contract was signed soon with the Government of Ecuador to provide security to the Embassy of Ecuador in London.

The contract was awarded to UC Global due to the difficulties that Ecuadorian security personnel had to travel to the United Kingdom, where a visa is required and several weeks are required for it to be processed prior to each placement. UC Global on the other hand had employees with Spanish nationality – who were able to move freely and reside in the United Kingdom by virtue of their EU citizenship - meaning that our employees could travel to London unimpeded, reside in the UK and even travel to Ecuador when necessary.

Thus, and although I am not aware of all of the details – given the fact that David Morales managed the company entirely on his own - in order to win the embassy security contract, Morales made payments for commissions to the SENAIN authorities (Servicio National de Inteligencia de Ecuador) which was the entity in charge of approving the award of the security contract to a private security firm, in this case UC Global. While I am not aware of the full details – due to not having been involved in the day to day management – I heard on several occasions at our offices that SENAIN was paying for the services of the contract via a company located in Miami linked to an Ecuadorian

airline. Afterwards, according to David Morales, our company paid commission to a group of Ecuadorian lobbyists via tax havens located in Panama, although I have no further details.

Around July 2016, by which time UC Global was already providing security services under a contract with the Government of Ecuador in London, David Morales travelled to a security sector trade fair in Las Vegas, which I wished to accompany him on, but he insisted he had to travel alone. On this trip, Mr Morales showcased the company UC Global in the Las Vegas security sector trade fair. Due to the fact that the company had essentially a single contract, UC Global, via David Morales, exhibited at the US security trade fair as its principal merit being the company that was responsible for the security of the famous embassy.

After his initial travels to the Unites States, UC Global obtained a flashy contract, personally managed by David Morales, with the company Las Vegas Sands, which was owned by the tycoon Sheldon Adelson, whose proximity to Donald Trump is public knowledge (at the time Trump was the presidential candidate). The contract did not make sense because its purpose was to provide security to the luxury boat that belongs to Sheldon Adelson, the Queen Miri, when the boat entered the Mediterranean Sea. That is to say, the contract was to provide security to the luxury boat during the short period during which it found itself in Mediterranean waters. But the most striking thing about it was that the boat had its own security, which consisted of a sophisticated security detail, and that the contract consisted in adding an additional person, in this case, David Morales, for a very short period of time, through which David Morales would receive an elevated sum.

After returning from one of his trips to the United States, David Morales gathered all the workers in the office in Jerez and told us that "we have moved up and from now on we will be playing in the big league". During a private conversation with David, I asked him what he was referring to when he said we had moved up into "the big league". David replied, without going into further detail, that he had switched over to "the dark side" referring to cooperating with US authorities, and as a result of that collaboration "the Americans will get us contracts all over the world".

In addition to the new contract, after Morales's return from Las Vegas and his comments about "the big league" and switching to "the dark side", I learned through my conversation with Davis Morales that he had entered into illegal agreements with U.S. authorities to supply them with sensitive information about Mr. Assange and Rafael Correa, given that UC Global was responsible for the embassy security where Mr. Assange was located.

Through my conversation with David Morales - in which Morales admitted to further details about the agreement he had entered into during his trip to the United States – I learned that at the Las Vegas Sands trade fair the Chef of Security of Las Vegas Sands, a Jewish man by the name of Zohar Lahav, had agreed the contract with Mr Morales, and the two had become friends. My understanding is that this person offered to cooperate with U.S. Intelligence authorities by supplying information about Mr. Assange.

This collaboration became more concrete over time. In fact, as the U.S. Elections neared towards the latter half of 2016, and especially once Trump had won the elections, David Morale's cooperation became absolutely clear, this reality was something that employees of U.C. Global openly commented and were fully aware of. Zhaer (Zohar) even travelled to Spain and stayed at David's home for a week.

The security work at the Embassy of Ecuador in London required keeping the (Ecuadorian) National Intelligence Agency appraised of every single occurrence inside the diplomatic mission. In order to do this, we had a closed circuit camera system (CCTV) that did not record sound inside the embassy, the sole propose of which was to monitor possible illegitimate access to the diplomatic mission. We also had security reports that were written up by the U.C Global security personnel who were physically deployed within the diplomatic mission, who informed us of any suspected entry from outside the embassy. David Morales informed me that as part of the contract, the company wrote reports on the basis of this material to SENAIN on a monthly basis approximately. David Morales was the person responsible for executing this.

However, as a result of the parallel agreement that David Morales has signed with U.S. authorities, Morales commented that these reports would also be sent to "the dark side". In order to do this, David Morales began making regular trips to the United States, principally to New York but also Chicago and Washington, he told me he was traveling to talk with "our American friends". At times, he would be accompanied by his wife, Noelia Paez, whose Instagram (under the profile "modas\_koko") left tracks through her posts, of the repeated travels, which consisted in one trip a month, or even on occasions up to two trips per month.

This happened approximately around 2017, and I recalled that David Morales asked a person from the company to supply a secure phone, with secure applications, as well as an encrypted computer for his communications with "the American friends", in order to take his relation with the United States outside the company environment.

At times, when I asked insistently who his "American friends" were, David Morales replied "U.S. intelligence". However, when I asked who specifically he was meeting with to provide this information, Mr David Morales would cut me off and stated that this was a matter he was managing separately from the company.

I began to notice that Davis Morales's wealth increased considerably after his regular travels to the United States commenced. This led to me openly accuse him in forceful confrontations in which I told him that a company of this nature must "generate trust" and cannot "supply information to the other side". These arguments would end with David Morales opening his shirt and saying "I am a mercenary through and through", which he did on several occasions. David Morales told me that he was doing this to gain contracts through the intelligence agency, and that there was no monetary gain, although by then I suspected that he was saying this mainly in order to try to conceal the personal gain he was receiving from the illegal operation. In fact, David Morales tried to resolve my reproaches by saying that he had managed to get a training contract on the border of Ecuador and Colombia, paid by the United States, which in fact did not happen, which further strengthened my supposition that he was being paid to transmit information.

From 2017, with the victory of Donald Trump, I realized that David Morales's trips to see "the American friends", which he did not want anyone else at the company to take part in, began to escalate. More specifically, around June or July 2017 David Morales began to develop a sophisticated information collection system inside the embassy. He asked the employees who were physically inside the embassy to intensify and deepen their information collection. The employees also received the instruction from David Morales to change the internal and external cameras of the embassy. The interior ones recorded sound. I was also informed by the employees that David Morales instructed a team to travel regularly to London to collect the camera recordings. After this, in Jerez packages of information were configured so that David Morales would personally bring

these to American authorities, with increased details and intrusion on the privacy of Mr Assange, his lawyers, doctors and other visitors.

He showed at times a real obsession in relation to monitoring and recording the lawyers who met with the "guest" (Julian Assange) because "our American friends" were requesting it.

When I realised what was occurring, and as a result of the constant fights I had with David Morales for "selling himself to the enemy", I decided to put an end to our relationship

Despite the fact everything that had occurred in relation to the United States had been handled by David Morales himself, I feared it could tarnish the company, so I decided to put an end to our contractual relationship.

I suspect that some of the payments to David Morales by U.S intelligence may have been made to accounts under his wife's name, Noelia Paez, via a dental clinic which she owned and which shut down, an account in the Caixa bank, given that I had heard on a few occasion that payments had gone into that account which Mr Morales did not wish to inform the rest of the company about.

Similarly, David Morales may have accounts in Gibraltar, given that he had made comments in the office about traveling to the British colony to hide cash.

Recently, as a result of the arrest of Mr. Assange and the extradition process that has been opened against him on request of the United States, I decided to alert Mr Assange's lawyers that David Morales, the administrator and director of the company U.C. Global over time betrayed both the terms of the contract and the trust that had been given to him by the Government of Ecuador, by systematically handing over information to US intelligence agencies, and that during a period of time he handed all information relating to security of the embassy and eventually also in relation to Rafael Correa. Thus, I came to realize that David Morales decided to sell all the information to the enemy, the United States, which is the reason I put an end to my professional relationship with him.

\*Translator's note: Ecuador's intelligence agency

### PRIVILEGED AND CONFIDENTIAL – WITNESS 2

Affidavit presented before notary public

I have made this affidavit so that it can be presented before the judiciary. I intend that my explanation of facts be put before the authorities and I understand that it may contain activities that are considered to be illicit. I never participated in illicit acts, nor did I intend to participate in such acts nor was I aware of them. That is why, despite being subjected to a confidentiality agreement, I am now putting these facts before the justice system. However, as a prior necessity I require the status of a protected witness, given that with this information, as well as the documentation that I am providing, my family and I will be put at risk.

I have decided to communicate this information as a result of recent events, specifically the detention of Mr. Assange and the revelation of a criminal prosecution in the United States against him resulting in an extradition process that is currently underway. When this information came to light I realised that the facts that I shall relate in this document make sense, and this is the reason why, now that I am aware of the relevance of these facts, I have decided to make Mr Assange's defence attorneys aware of them so that they can be used in a legal context in whichever manner is most appropriate.

I joined the company UC Global in 2015.

The sole administrator and director of UC Global has always been David Morales.

I remember that after David Morales had returned from the United States, at a meeting with the rest of the staff he affirmed that we were moving into "the premier league". After this I became aware that David Morales was making regular trips to the United States, the context of which my boss, David Morales, repeated to his having "gone to the dark side". I also recall Morales's wife's social media recording the recurring trips to the United States, specifically to New York and Washington, via her Instagram account (with the profile @moda\_koko), which prompted ongoing commentary from staff that Mr Morales could be cooperating with US authorities.

On 24 January 2017, once Donald Trump had acceded to the presidency of the United States, David Morales sent a message over Telegram in which he wrote, "Well, I want you to be alert because I am informed that we are being vetted, so everything that is confidential should be encrypted [...] That's what I'm being told. Everything relates to the UK issue. I am not worried about it, just be alert [...] The people vetting are our friends in the USA". At the time I didn't understand why Morales was asking me to be careful, but over time this message made more sense. I possess these messages as evidence.

I remember that Sheldon Adelson himself – who is on the public record as being very close to President Donald Trump—increased his ties with UC Global because at one point David Morales was personally put in charge of the security of the magnate and his children when they visited Europe, in their Summer trips to Nice and Ibiza.

I also recall that once Donald Trump won the elections, at the end of 2016, the collection of information intensified as Morales became more obsessed with obtaining as much information as possible. Hence, I recall that between June and July 2017, I was summoned by David Morales to form a task force of workers at our headquarters in Jerez. The purpose of this unit was to execute, from a technical perspective, the capture, systematization and processing of information collected at the embassy that David Morales requested. So, I was tasked with executing David Morales's orders, with the technical means that existed in the embassy and additional measures that were installed by order of Morales, in addition to the information gathered by the UC Global employees who were physically present in the diplomatic mission. This unit also had to travel to London every month to collect information.

Coinciding with the new procedure to obtain information to meet the escalating needs of Morales, which coincided with Trump's accession to the US presidency, David Morales indicated to the task force, of which I was a member, that the contract with Ecuador required that the cameras had to be changed every three years. This made no sense to me because the contract had been in force for longer than three years and the clause had not been fulfilled to date, although I was not aware of the clause, I considered that its existence was not a reasonable justification. The circuit that was in operation at the time consisted of CCTV security cameras, which obviously did not record sound, were sufficient to provide physical security against intrusion inside the building. As evidence of this, I provide a message from 10 May 2017 in which a report is required concerning the cameras in the embassy.

David Morales asked me explicitly – in my role as a member of the task force – to contact providers that sell security cameras with sophisticated audio recording capabilities. He even indicated that insofar as possible, the cameras should not show that they are recording sound, or at least that the appearance of the cameras should not show that they are recording sound. Because of this, and in accordance with the orders of David Morales, who claimed that all of this was necessary to fulfil the contract, I sought providers for these types of cameras, insisting in, to the extent possible, concealing audio-recording capabilities.

In early December 2017, I was instructed by David Morales to travel with a colleague to install the new security cameras. I carried out the new installation over the course of several days. I was instructed by Morales not to share information about the specifications of the recording system, and if asked to deny that the cameras were recording audio. I was told that it was imperative that these instructions be carried out as they came, supposedly, from the highest spheres. In fact, I was asked on several occasions by Mr. Assange and the Political Counsellor Maria Eugenia whether the new cameras recorded sound, to which I replied that they did not, as my boss had instructed me to do. Thus, from that moment on the cameras began to record sound regularly, so every meeting that the asylee held was captured. At our offices in UC Global it was mentioned that the cameras had been paid for twice, by Ecuador and the United States, although I have no documentary evidence to corroborate this assertion.

To prove the fact of the installation I have numerous photos of the installation of the new camera system, as well as copies of recordings that were made by the cameras which show that they were recording sound.

Around June 2017, while I was sourcing providers for the new camera equipment, David Morales instructed that the cameras should allow streaming capabilities so that "our friends in the United States", as Morales explicitly put it, would be able to gain access to the interior of the embassy in real time. This request alarmed me greatly, and in order to impede the request, I claimed that remote access via streaming the camera circuit was not technically achievable. David Morales continued to insist that we must proceed to open the circuit "for the Americans", and soon after Morales emailed me a Powerpoint document. This document was in English and contained instructions in minute detail of how to capacitate the system for remote access via streaming. Obviously, Morales did not have such technical knowledge, so the document must have been supplied by a third party. I suspect that it could have been US intelligence, given that it was in English. Once more, I refused, this time alleging that it was manifestly illegal, and therefore could not be a requirement of the contract, while also attempting to persuade Morales as a means of dissuading him that this would clearly be discovered by Mr. Assange, as I knew that this argument would restrain Morales. I did this because I did not want to collaborate in an illegal act of this magnitude.

In addition to this, around January 2018 David Morales asked me to travel to London to install microphones in the embassy. I asked him if it was legal, Morales responded that he was the boss that the responsibility fell on him as he was the one with knowledge of the contract and who was responsible for the security. Morales instructed me to place a microphone in the meeting room, placed in the PVC holder of the fire extinguisher in the meeting room, where it was glued to a magnet and then concealed at the base of the PVC plastic.

Further to this, David Morales asked me to install a another microphone, in the toilet at the end of the embassy, a place that had become strategic because Mr. Assange, who suspected that he was the subject of espionage, maintained many of his meetings there in order to preserve confidentiality. I also challenged Morales on this instruction, to which Morales responded that he was the boss and the person who knew the elements of security that had to be installed in order to fulfil the contract. I used a nearby socket to conceal a microphone in a cable in the toilet in the back of the embassy.

As evidence of this I possess the microphone that was installed in the meeting room. In respect of the microphone that was installed in the toilet, this was never removed, and may still be there. I also have several recordings captured by the microphones, the recordings show that the microphones recorded continuously. Furthermore, I also possess photos of the fire extinguisher from the meeting room of the embassy which carried the magnetized microphone concealed by the PVC base in which it was placed. I also have numerous pictures of the ladies' bathroom, which were taken in order to determine which elements could be used to place a microphone.

When I returned in January 2018, David Morales commented openly that "our American friends" had asked him to install microphones throughout the embassy, but they asked him to carry out this task himself, without anyone's help. This is when I realised that the two microphones that had been installed already had been deployed as part of Morales' dealings with US intelligence and that he had deceived me in order to have me install them. Specifically, Morales told several staff, among them myself, that he intended to place the microphones in all the fire extinguishers in the embassy (attached with a magnet to the PVC base of the fire extinguishers) the reasoning of which was that, given that fire extinguishers were needed in each of the rooms of the embassy, this way one could be introduced in the room occupied by the asylee, Mr. Assange, which would allow the entire embassy to be bugged. Once again, I challenged Morales on the legality of these measures and I tried to dissuade Morales indicating that, in addition to it being completely illegal, installing microphones at this scale would be discovered for sure, to attempt to dissuade him from carrying out such a crazy act. As a result, and as far as I am aware, this plan was not executed.

David Morales indicated that the purpose of installing the microphones, as per the request of the United States, was for the microphones and cameras which were situated in places like the meeting room to record the meetings that Assange has with his visitors, but especially those of his defence attorneys and, very specifically, the coordinator of his legal defence Baltasar Garzon. Morales subsequently stated that gathering information on Garzon should be prioritised, the security guards at the embassy were requested to search for evidence of travels to Argentina and Russia in Garzon's passport pages, which were photographed.

David Morales also indicated that the aim was that the surveillance, control of information and recordings should focus on the meetings of the asylee, especially those in which he was meeting with his lawyers, who were priority targets, so the security personnel that were physically deployed in the embassy were specifically asked to monitor these meetings of Assange with his lawyers, as this was required by our "US friends". Morales always ended these instructions commenting that he was the only one who had full knowledge of the contract and who knew the measures that were necessary to take in order to fulfil it.

When I travelled to install the cameras in December 2017, David Morales asked me to take pictures of the base, profile, and height of various decorative objects in the meeting room. Thus, following Morales' instruction, without knowing what the purpose was, I took these photos. When I returned to Jerez, once I was in the UC Global headquarters, David Morales revealed that he was going to have them copied in Spain so that microphones could be concealed inside them, which I once again forcefully challenged. As far as I am aware, these measures were not taken either.

To prove the above, I have a number of photos decorative objects that were in the meeting room which David Morales intended to replicate in order to insert said microphones.

I am aware that at one point David Morales asked the security personnel employed by UC Global who were deployed inside the embassy to obtain Mr. Assange's fingerprints. As far as I am aware,

his fingerprints were obtained from his imprint on a glass used by Mr. Assange. The information relating to the asylee's fingerprints were then handed to David Morales. I am also aware that the security personnel at the embassy stole documentation from Mr. Assange. A calligraphic analysis was commissioned which David Morales also obtained. It is clear to me that both the fingerprints and the calligraphic report must have been requests from US intelligence to David Morales.

In the same trip in December 2017 in which I installed the new cameras, David Morales asked me to steal a nappy of a baby which, according to the company's security personnel deployed at the embassy, regularly visited Mr. Assange. Morales stated that I had to steal the nappy in order to establish whether the baby was a child of the asylee's. On this occasion, Morales expressly stated that "the Americans" were the ones who wanted to establish paternity. Confronted with this situation, when I arrived in London, rather than execute what had been asked of me by Morales, I approached the mother of the infant outside the embassy and indicated that she should not bring the child into the embassy because there was a plan to steal the baby's nappies to establish whether the child was Julian Assange's.

At another point, in January 2018, David Morales told me that for my next visit to the embassy of Ecuador in London I should place certain stickers on all the external windows of the embassy. Specifically, he requested that I place them in the top left corner of all the windows. The stickers were rather rigid. They indicated that CCTV was in operation. I found this strange, because there had been a closed-circuit system for several years, and it didn't make sense to now have to advertise this on the windows of the embassy. Nonetheless, during my visit to London I placed the stickers that had been supplied in the upper left-hand corner of the windows of the embassy, following the instructions of David Morales. When I returned to Jerez, Morales explained that "our American friends" had laser microphones outside the embassy, which were directional and pointed at the windows and extracted noise, allowing them to capture all conversations. However, as David Morales stated openly, due to the fact that Mr. Assange used a white noise machine (to make it difficult to obtain sound recordings) which produced a vibration in the window that stopped the sound being extracted via the laser microphone which US intelligence had installed outside. Thus, Morales had revealed when I returned that those stickers, which had been supplied by "our American friends", having been placed in the upper left-hand side of each of the windows, eliminated the vibration allowing the laser microphones to point to the stickers to extract conversations. I confronted Morales for not having indicated the purpose of placing the stickers.

In addition to the above, I have knowledge of the fact that David Morales had received explicit requests for information, which stated on several occasions that these requests came from the US, in the form of a list of targets which were communicated via email, telephone and verbally. The security personnel deployed in the embassy were instructed to pay special attention to these targets. Among them, special attention had to be given to Mr. Assange's lawyers. The security personnel had to write detailed profiles of these targets, photographing their documentation, the electronic equipment that had to be left at the entrance of the embassy, and as far as possible, the visitors' conversations with the asylee listened to. In some cases, this involved following them, tracking their every move and carrying out detailed reports of each of the visits of these targets which had to be immediately sent back to the headquarters of UC Global in Jerez.

As evidence of the above I have several emails in which the targets to be followed are details, pictures from the company of these targets, the register and daily reports that were carried out and photos of the equipment of the targets which were handed to security personnel when visitors entered the embassy, which was stipulated as a requirement of the security protocol.

Specifically, I recall that during the initial months of 2016 during one of my first visits to the embassy of Ecuador in London, one of the members of UC Global who was deployed in the embassy showed me an iPad of one of the lawyers, who at the time was meeting with Mr. Assange and who had left this equipment with the guard upon entering the embassy, which had many messages and emails in the home screen. I do not remember the name of that lawyer, but I know he spoke English and that later, after seeing a number of pictures, I believe with 99% certainty is a man by the name of Guy Goodwin Gill. I remember that after this, once I had returned to Jerez, I was told that the contents of the iPad had been copied.

On a different occasion, I recall having seen reports that had been sent from the embassy in which UC Global security personnel deployed there had opened a suitcase of Andy Muller and photographed all his electronic equipment. Andy Muller is a personal friend of Assange, an IT specialist and a freelance journalist for various publications and he had left his belongings in the entrance, fulfilling the requirements of the security protocols. Muller was one of the targets that David Morales had instructed had to be prioritised, on behalf of US intelligence.

As evidence of this, I have several photos of the belongings of Muller, which were included in one of the security reports.

I also have to indicate that at one point, at the end of 2017, the company learned Mr. Assange would receive a diplomatic passport from Ecuadorian authorities, with the aim of leaving the embassy to transit to a third state. I recall that the security personnel of UC Global deployed at the embassy were closely monitoring the then Consul of Ecuador, Fidel Narvaez, who was in charge of the relevant documentation with which he entered and exited the embassy.

I also recall David Morales saying in the office that the Americans were very nervous about a Californian politician who was going to the embassy of Ecuador in London to meet with Mr. Assange. According to Morales, the Americans had asked Morales to personally control and monitor absolutely everything that had to do with that visit. Thus, from the company headquarters in Jerez, I recall that Morales gave an explicit order to the security personnel to record everything that occurred during that visit.

I recall that at the end of November 2017, David Morales told the company workers that the Americans were very happy with the information that we had supplied, but that they would need more. To this end, Morales spoke about the possibility of entering the legal offices of ILOCAD, the law firm which is headed by Baltasar Garzon in Madrid, given that Mr. Garzon coordinated the legal

defence of Julian Assange. This would allow us to obtain information concerning Mr. Assange for the Americans. Two weeks after this conversation, the national media reported that men in balaclavas had entered Garzon's law offices. I recall that the news was shared amongst the employees in the Jerez office, and we speculated whether this could have to do with what our boss, David Morales had suggested.

All the requests of surveillance, following and capturing communications in relation to Baltasar Garzon, came from the Americans, according to David Morales. Garzon was a primary objective because of the fact that he was Julian Assange's defence attorney.

I recall that on one occasion, in Jerez de la Frontera, at the UC Global headquarters, around December 2017, David said that the Americans were desperate and that they had even suggested that more extreme measures should be employed against the "guest" to put an end to the situation of Assange's permanence in the embassy. Specifically, the suggestion that the door of the embassy could be left open, which would allow the argument that this had been an accidental mistake, which would allow persons to enter from outside the embassy and kidnap the asylee; even the possibility of poisoning Mr. Assange was discussed, all of these suggestions Morales said were under consideration during his dealing with his contacts in the United States. Obviously, we employees were shocked at these suggestions and commented amongst ourselves that the course that Morales had embarked on was beginning to become dangerous.

Morales also instructed that Baltasar Garzon should be followed, as per the instructions of his contacts in the United States, as Morales had received information that Mr. Garzon would be meeting with the former president of Ecuador, Rafael Correa. I recall seeing photographs of Garzon from the operation to follow him, instructed by Morales.

As evidence of this, I possess numerous photos taken with a mobile phone of Mr. Garzon when he collected the former president of Ecuador, Rafael Correa, from Madrid Barajas airport, as well as pictures of the home of Baltasar Garzon, Julian Assange's lawyer.

As I have explained already, it was obvious that all this escalated after mid-2017, coinciding with Donald Trump's accession to the presidency. All the documentation obtained through the espionage deployed by Morales against the asylee was transmitted to the United States through two channels. Firstly, the daily reports by the security personnel of the embassy, the profiles of the targets, the identity documents of the visitors and other information that had been obtained through the embassy, was copied onto servers which the US had remote access to. Secondly, the recordings of the cameras with sound that were installed in the embassy were saved onto hard drives that were extracted every 15 days, together with the recordings from the microphones, these were then personally transported by David Morales on his regular trips to the United States.

In respect of the servers, David Morales requested that an FTP server be installed for remote access and external transfer accessible via a username and password. I personally installed the FTP server and I was able to confirm that the server was indeed accessed remotely from the United States, IP addresses were recorded as a result, which I still have in my possession. This FTP Server stored the daily security reports that UC Global employees deployed at the embassy carried out, which surveilled Mr. Assange in detail, as well as his visitors, and the targets, including all the relevant information such as their identity documents. I recall that at first, these daily reports, which were stored in the FTP server were signed by the security personnel using their respective pseudonyms but that at one point David Morales told me that he had been told that these should be signed with the real name and surname of the employee, although I did not understand why there was this need. Later on, David Morales asked for this FTP Server to be replaced by an online web database, which could be accessed remotely via username and password.

As evidence of the above, I have the IP addresses that were registered in the FTP Server registry from the United States, and many of the security reports stored that had been provided by the UC Global employees deployed at the embassy. I also have the identity documents which were included in the profiles contained in the server. I also have the email in which David Morales asks that special attention be paid to a set of objectives that would have been identified by the Americans, among whom are his lawyers.

Furthermore, the recordings of the security cameras which by now were recording sound, as well as the recordings from the microphones, were managed in person. I was instructed by David Morales to travel to the embassy of Ecuador in London every 15 days to change the hard drives of the camera servers. I had to go every fortnight because after 15 days, the system began to overwrite itself, given that the storage had a 15 day maximum storage capacity. I have to emphasise that David Morales always required me to take the original recordings from the cameras, never copies, I assume as a requirement by the Americans. In fact, on a couple of occasions, Ecuadorian authorities requested a recording which meant that David Morales had to travel to the United States to ask for the original recordings. Thus, the recordings from the security cameras and of the microphones, once they reached Jerez, were then taken personally by David Morales to the United States in regular trips, in which Morales often travelled with his wife, through whose social media profile (@modas koko) their regular trips can be observed. Furthermore, while Mr. Morales was in meetings with his contact in the United States, he would write to us employees in chat groups, on Signal, Telegram or Therman, in which he asked for further details about certain visits or details about the recordings, saying that "our American friends are asking me to be more specific on...", given that Morales didn't know about the details to the same level as the employees. Although these chat groups were configured to auto-destruct, at some point I did screen captures in order to remind myself of instructions, so as a result I still have some of those in which it is clear that David Morales was communicating while he was in meetings handing over the material.

As evidence of this, I have screenshots of the chats, as related above. I also have emails which contain some of these instructions.

David Morales wrote in his emails that SENAIN was investigating him due to his travels to the United States, he also asked for the composition of the walls of the embassy, and even said that nobody could learn about his relationship with the Americans.

As evidence of this, I possess emails with the abovementioned comments.

A further relevant element is that the headquarters of UC Global in Jerez received Gabriela Paliz Jerez on a monthly basis. She was the person responsible for security in the embassy of Ecuador in London, and is an Ecuadorian functionary. When she visited UC Global in Jerez she was always accompanied by her husband, whose name I do not know. All the employees were aware of these visits given that they witnessed the couple appear on a monthly basis to meet with David Morales. It was said in the office that it was fundamental for David Morales to keep the embassy contract, probably not so much for the amount paid by Ecuador per se, but rather for the possibility of incrementing profits via his relationship with the United States. It was discussed among the employees that David Morales would have been paying 20,000 euro a month to the person who was in charge of embassy security to avoid their making negative reports about UC Global, as such reports would put the contract at risk. The person in charge of security would travel with her husband in order to divide the cash payment of EURO 10,000 each in order to avoid problems when going through customs at the airport, as was commented onn the company.

During those months, between mid-2017 and mid-2018 (when the contract with UC Global came to an end), David Morales displayed a noticeable increment in his assets. He acquired a new home, the value of which I do not know but I estimate could cost approximately EURO 1 million. He also acquired high-end vehicles. In the company, it was said that he was paid EURO 200,000 a month by the United States. During those months, the employees speculated that he might be storing the money he had received illegally in bank entities in Gibraltar. In fact, we observed that David Morales often travelled to Gibraltar, which is relatively close to Jerez and which is considered by the Spanish jurisdiction to be a tax haven because it typically does not cooperate in identifying assets. On one occasion at our office headquarters, a client of UC Global, whose name I do not know, commented in front of me that David Morales was "tight-fisted", because Morales had tried to "launder EURO 70,000 in Gibraltar", and that to carry out this operation "Morales had been asked for a 10% commission in Gibraltar to launder it and Morales had refused".

Finally, I recall that at the end of 2018 there was a request to the company by ILOCAD SL, Baltasar Garzon's law firm, requesting on behalf of Mr. Assange on the basis of the new EU General Data Protection Regulation that the company inform what material it possessed relating to Mr. Assange, given that some images had been leaked to various media organisations like The Guardian. At that point, Morales proceeded to remove all the material from "Operation Hotel" (the name that was given to the security contract of the embassy) as well as all the material relating to the "guest" (the codename for the asylee). According to some workers in the company, the material was stored by Morales in his two homes in Jerez, or the home of his father-in-law in Rota, according to what was being said in the company.