I, Catalina Maria Jaramillo, declare as follows:

1. I am over the age of 18 years old. I have personal knowledge of all matters stated herein, and, if called as a witness, I could and would competently testify thereto. I certify that it is accurate and truthful.

2. I am the Claimant in this matter.

3. I am an academic (PhD candidate).

5. Popeye's interview was registered with the American Copyright Office in 2021. Reference number Pau 4-086-477. Evidence 1.

6. I am the only one who has the exclusive rights. I am the only one who has the copyright of my interview with Popeye in 2018 and the full material which relates to this interview. This interview related to a PhD from the University of Edinburgh and this material was confidential. I don't allow the distribution, public publicly perform and display, share, sell or any kind of alteration can make to my confidential work.

7. John Jairo Velasquez agreed to give me an interview in 2018. This interview was intended to be part of my PhD at the University of Edinburgh and was confidential.

8. I travelled from Edinburgh to meet John Jairo Velasquez on 8th May 2018.

9. I wrote the questions for the interview from five years of research work from 2014. The interview of Popeye (Popeye's interview evidence 2) is my creative material.

10. I met John Jairo Velaquez in Medellin on 9 May 2018.

11. Velazquez and I agree that Sebastian Lugo Xibille, alias Adolfo x, recorded my interview, but he has never had any copyright over the material.

11. On 14 May I interviewed John Jairo Velasquez, alias Popeye (evidence 2). Evidence 2 shows part of the video of my interview.

12. I allowed John Jairo to select Sebastian Lugo Xibille to avoid putting Velasquez in danger. He was paid from the beginning. He even edited the video, and I collected a CD with my full work. I instructed him how he must edit my work, but I never gave him permission to publish, distribute or manipulate my work (evidence 3 and 4). Evidence 3 and 4 show the WhatsApp messages between him and me.

13. Sebastian Lugo Xibille has shared my work without my permission to Juliana Duque and (third party), who also has published my work without my permission.

18. Sebastian Lugo Xibille and Juliana Duque have previously participated together in a film, which indicates that they have a relationship, and that Juliana Duque has access to my material. Evidence 5 is a copy of that video, showing that the video was published by Nextark (NTK Cinema).

20. On 11 January 2021, "El Cine favorito de Pablo Escobar" https://www.youtube.com/watch?v=M43sVVNfRHQ and "Entrevista Nunca vista de Popeye" https://www.youtube.com/watch?v=M43sVVNfRHQ were published and distributed without my permission. These two videos were published on two different channels on YouTube: Popeye Arrepentido and Nextark (NTK Cinema). One example of the long version of the video is shown in evidence 6, published on Nextark.

22. My work was copied, distributed in YouTube without my permission, they created a derived when Juliana personated me and take the credit of my work. Myself was removed and I was replaced by Juliana Duque (this is a photomontage of my work) please see the copy shows both videos. Juliana Duque imitated me and used the answers from and the video of my interview. Please find attached a copy of the two videos (evidence 2 and evidence 6) and the photographs (evidence 7). It became obvious that the YouTube video was a photomontage because the tiles and Popeye runners were erased, and Juliana Duque does not follow the perspective of the original video.

23. When I spoke to Juliana Duque in Facebook, she said that her questions were very different from mine (see attached for my interview – she used my questions). This was a false statement. She also affirmed that my interview was very generic, and my questions had never been asked before, but it was the result of three years of research work between 2014 and 2020. It was not generic or common at all (evidence 8).

24. In more detail, I show some example of the sections which were taken from my original video:

A. 0:25 evidence 6- James Bond's Narrative: Juliana Duque copies of my interview (video 9)
Jaramillo: Was there any interest in James Bond, and why?
Velásquez: No, at that time James Bond was totally crazy here. Whenever a James Bond film came out it was madness, but Pablo Escobar Gaviria didn't like James Bond. He liked to watch Al Capone, he liked to watch the films of the great Mario Puzo who wrote The Godfather. He liked… he liked… he really liked the film Scarface, which came to Colombia in '83, and the boss loved those big films. He would watch it, relaxed, smiling.

B. 1:28 Evidence 6 - Dallas's Narrative: Juliana Duque copies of my interview (video 10)
Jaramillo: What were Pablo Escobar's favourite TV shows? Did he watch Dallas or The A-Team?
Velásquez: Well, at the time Dallas was crazy, the glamour, the grand houses, the beautiful women, the elegance, because here there was no glamour and the boss didn't spend much time watching TV. He really liked watching the international news because he had a huge parabolic aerial on the Monaco Building and he liked watching the international news to see how the current situation in Colombia was, but not The A-Team, because The A-Team was mostly

fiction and crazy stuff, and for us, when it came to the Medellín Cartel, reality went beyond fiction.

C. 1:54 and 4:50 Evidence 6 - news's narrative: Juliana Duque copies of my interview (video 10)
Jaramillo: What were Pablo Escobar's favourite TV shows? Did he watch Dallas or The A-Team?
Velásquez: Well, at the time Dallas was crazy, the glamour, the grand houses, the beautiful women, the elegance, because here there was no glamour and the boss didn't spend much time watching TV. He really liked watching the international news because he had a huge parabolic aerial on the Monaco Building and he liked watching the international news to see how the current situation in Colombia was, but not The A-Team, because The A-Team was mostly fiction and crazy stuff, and for us, when it came to the Medellín Cartel, reality went beyond fiction.

E. 2:39 – Monaco's narrative: Juliana Duque copies of my interview (video 9)
Jaramillo: Where does the name Monaco come from? Might he have seen the film To Catch a Thief? Did the Monaco Building have secret tunnels? Why did he write his initials on the building?
Velásquez: Well, Pablo Emilio Escobar Gaviria couldn't get away how much here, at the time, we had always loved foreign things. For us, Monaco is a principality. Here, we've been hearing about Monaco our whole lives, and that's why he called it Monaco Building because it's very pretty, and because of the principality of Monaco, and it's a great building.

F. 7:20- Mission Impossible narrative: Juliana Duque copies of my interview (video 10)
Jaramillo: Could you tell us the story about Mission: Impossible?
Velásquez: Well, in the 80s and 90s, Mission: Impossible was a great programme here in the Colombian Republic. We would watch television first in black and white and then in colour. And once on Mission: Impossible they said: "in the next one, in the next episode, we're going to kill Pablo Escobar." It made the boss laugh and he said, "Let's see how they're going to kill me." So, we watched the programme and in the end it was total nonsense, but we laughed. Pablo Escobar was interested in how a scriptwriter could go after him to kill him because Pablo Escobar was always learning. But he liked it, but we didn't watch .a lot of television, no, we didn't spend much time watching television because we spent it killing people, and my boss was fascinated, he was mad about the news, he would watch the news at midday and at night like a sacred ritual.

G. 4:50- Escobar's idols: Juliana Duque copies of my interview (video 10)
Jaramillo: Who were his idols?
Velásquez: Pablo Emilio Escobar Gaviria's idols were Al Capone and Pancho Villa. He admired those two outlaws. He admired them for how strong they were; especially Pancho Villa. He was a great warrior because he fought for the people. And Al Capone because he went against everything that had been established. He was one of the first, the great Mafia man of Chicago, and Pablo Escobar

Gaviria admired him.

25 These videos clearly show that my exclusive rights were violated because part of my academic interviewed was used.

26 Juliana Duque also publicly perform in this video when she pretend to be me, the one who made the interview. My exclusive rights were also violated when my interview was displayed publicly.

27. I want to clarify that there is no fair use or educational use because the interview is confidential and the YouTube channel Popeye Arrepetido and Nextark are not educational channels

28. Juliana Duque started to answer comments published in 2021. It was mentioned that the person in the interview had sex with John Jairo Velasquez. She denied this but she still encouraged speculation around it because Nextark indicated that this did happen (evidence 11).

24. Juliana Duque also recognised in the chat that she had carried out the interview, which she did not (evidence 11).

25. On 15 March 2021, I started to talk to Juliana Duque on Facebook to tell her that she had published my video on her Instagram and Facebook. She published the video on Facebook on 25 January 2011. Evidence 12 shows her publication of the video on Instagram and evidence 13 shows publication of the video on Facebook.

26. Juliana Duque asked me if something had happened and if she owed me something. I told her that she had published my creative material and she had not removed it. I asked politely. I asked her to remove any other materials of mine, or I would take legal action. She is taking ownership of my confidential work, and I told her: “You damaged my work and people should know. Do I lie? You do wrong things, and then you want to appear as a model for Latin America”.

27. Juliana Duque affirmed that the video was not exclusive. Velasquez signed a document to use his image, but this does not mean that it is exclusive. They signed a document with a fingerprint and ID to allow them to use Velasquez’s image. I never saw that document. (evidence 14 incorporates the messages between Juliana Duque and me).

28. A document signed to allow use of an image does not give the right to copyright of material. I never signed any document where I gave them the copyright of my interview.

30. Juliana Duque told me that she was going to take me to court. She thinks that she can use the interview because I do not appear in the interview and said that I am angry because her interview was published instead of mine (evidence 14).

31. Juliana Duque recognised that she published the video on Instagram, and she was allowed to remove it. The video was removed because I opened a copyright claim. She never removed

the video from Facebook when she was aware that she did not have permission to use it (evidence 15 and evidence 16).

32. Juliana Duque informed me that, if I did not leave her alone, she would publish the video again on Instagram, Telemundo and TikTok. She argued that my work was not exclusive, but it is exclusive because I made those questions, and it was my video and my interview – she was using my material. This interview was confidential material for a PhD, and I never granted permission for the material to be used. After I opened this case, my material was published on TikTok and even on a Russian website (evidence 16).

33. I told Juliana Duque on Facebook: "If you publish you should know and understand that we are about to open a legal claim in Colombia. Your friend's lawyer can confirm this. I should remind you that you would be acting in bad faith, and it is your decision if you want a court to ask me to remove my material. I do not think that Telemundo lends itself to that and I would send them all my copyright documentation and you would have to face a Demand. This message serves as evidence that I have tried to explain that you cannot use this creative material because it is material confidential to a doctorate. Any publication would be acting in bad faith, and I hope that you understand that. I only wrote the public messages so that you could show your face and to make you aware that this material belongs to someone else." Evidence 16

34. Juliana Duque did not stop publishing my material and the material was never removed.

35. Juliana Duque published an email to be sent from the Velasquez family on her Facebook page. In that message, of which she sent me a copy via Facebook, she mentioned that they were going to publish the video again on YouTube so they could get my address. She informed me that her husband worked for the FBI. Evidence 17 shows the letter sent by email and evidence 18 shows the message published on Juliana Duque's Facebook page.

36. The video "El Cine y Series que Veia Pablo Escobar" was published again on 15 March 2021 on Popeye Arrepentido (evidence 19).

37. Sebastian Xibille and Juliana Duque have published more than 13 videos on the two YouTube channels. They have constantly given false YouTube statements to send counter-notifications, providing fake addresses. They have also made money from each publication.

FINANCIAL DAMAGE

38. The distribution of my work has damaged my reputation and the quality of my work because it has related my work to prostitution. It has devalued the value of my work (evidence 11).

39. The publication of my material has affected my PhD.

40. The material was damaged because it was exploited for a long while for popular channels:

Popeye Arrepentido has 1.2 million followers.

Nextark (NTK Cinema) has 51,400 followers.

Juliana Duque's Instagram has 1,675 followers.

41. Popeye Arrepentido and Nextark are channels that make money from videos. For example, a similar video about la Catedral published on Nextark – https://www.youtube.com/watch?v=atqlWlYbSQ0 – has had 2 million views and made around 3,783 dollars per video. Evidence 18 shows photographs of a video from the following website: https://influencermarketinghub.com/youtube-money-calculator/. Evidence 20.

42. John Jairo Velasquez mentioned that an interview with him cost Discovery Channel 400,000 dollars. He meant to divide that with his manager, Pamela Ingrao. I consider the value to be higher because John Jairo Velasquez passed away. I lost the opportunity to sell my material as new material because it has already been exploited by Juliana Duque and Sebatian Lugo Xibille, reducing its value.

43. My material has been published for three years. The material was published in 2021 and the 2023 video on Popeye Arrepentido was made private. The video was never removed because it was claimed using a fake counter-notification.