

**IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

**JAP HOME SOLUTIONS, INC.;**  
**GUSTAVO FRECH BARRIERO; and**  
**JESUS ANTON PEREZ,**

Plaintiffs,

v.

**LOFFT CONSTRUCTION, INC.;**  
**ALEJANDRO R. SANGUINETTI; JOHN**  
**E. DRURY; and JOSÉ GALLEGO**  
**ESPINA,**

Defendants.

Case No. 2017-CA-003390 B  
Judge: Hon. Michael L. Rankin  
Next Event: Status Conference on November  
17, 2017 at 10:30 a.m.

**DECLARATION OF KATIE TOWNSEND**

I, Katie Townsend, declare as follows:

1. I am the Litigation Director at the Reporters Committee for Freedom of the Press (“Reporters Committee”), an unincorporated nonprofit association located in Washington, D.C., a position I have held since September of 2014. I am an attorney and counsel of record for Defendant José Gallego Espina in this matter. I am a member in good standing of the bar for the District of Columbia, and am admitted to practice before this Court. I have personal knowledge of the matters stated in this declaration.

2. Attached hereto as **Exhibit A** is a true and correct copy of the relevant pages of the following publicly available legal dictionary: Guillermo Cabanellas de las Cuevas, Eleanor C. Hoague, Butterworths Spanish-English Legal Dictionary 382 (Butterworth Legal Publishers)

1991. This legal dictionary translates the Spanish word “malversación” as “misappropriation or embezzlement” in English.

3. Attached hereto as **Exhibit B** is a true and correct copy of the relevant pages of the following publicly available legal dictionary: Guillermo Cabanellas de las Cuevas, Eleanor C. Hoague, Butterworths English-Spanish Legal Dictionary 213, 408 (Butterworth Legal Publishers) 1991. This legal dictionary translates the English word “misappropriation” as “apropiación indebida” or “malversación” in Spanish. Its entry for the definition of the English word “embezzlement” reads as follows: “desfalco. Defraudación. Apropiación indebida de fondos” in Spanish.

4. Attached hereto as **Exhibit C** is a true and correct copy of the relevant pages of the following publicly available legal dictionary: Henry Saint Dahl, Dahl’s Law Dictionary 325, 673 (William S. Hein & Co., Inc.) 4th ed. 2006. This legal dictionary translates the Spanish word “malversación” as “embezzlement, misappropriation, swindle” in English. It translates the English word “embezzlement” as “defraudación, estafa” in Spanish.

5. On September 17, 2017, I used the website Google Translate to translate the word “misappropriation” from English into Spanish. The website Google Translate translated “misappropriation” into the Spanish word “malversación.” Attached hereto as **Exhibit D** is a true and correct screenshot of the website Google Translate displaying the translation of the word “misappropriation” in English to “malversación” in Spanish.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 18, 2017.

/s/ Katie Townsend  
Katie Townsend