

EXHIBIT J

**Primeau Forensics Expert Report
February 24, 2015**

PRIMEAU FORENSICS

IDENTIFY | CLARIFY | TESTIFY

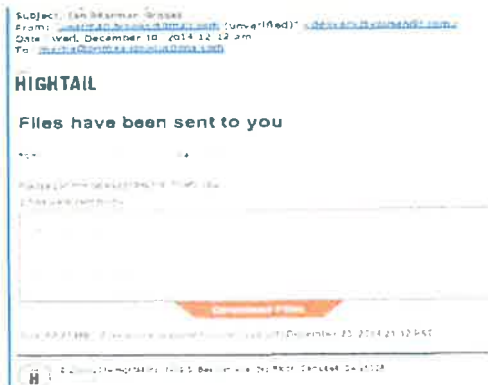
February 24, 2015

Ian Pearman-Brooks

Dear Mr. Pearman-Brooks,

I am an audio and video forensic expert and have been practicing for over 30 years. I have testified in several courts throughout the United States and worked on various international cases. My forensic practices for audio investigation include digital and analog audio authentication, restoration and voice identification. As a video forensic expert, my practices include video authentication, restoration and identification.

On or about September 8, 2014 I received the following email which includes the same digital audio file twice:



On February 23, 2015 I also received a thumb drive containing the same mp3 file:

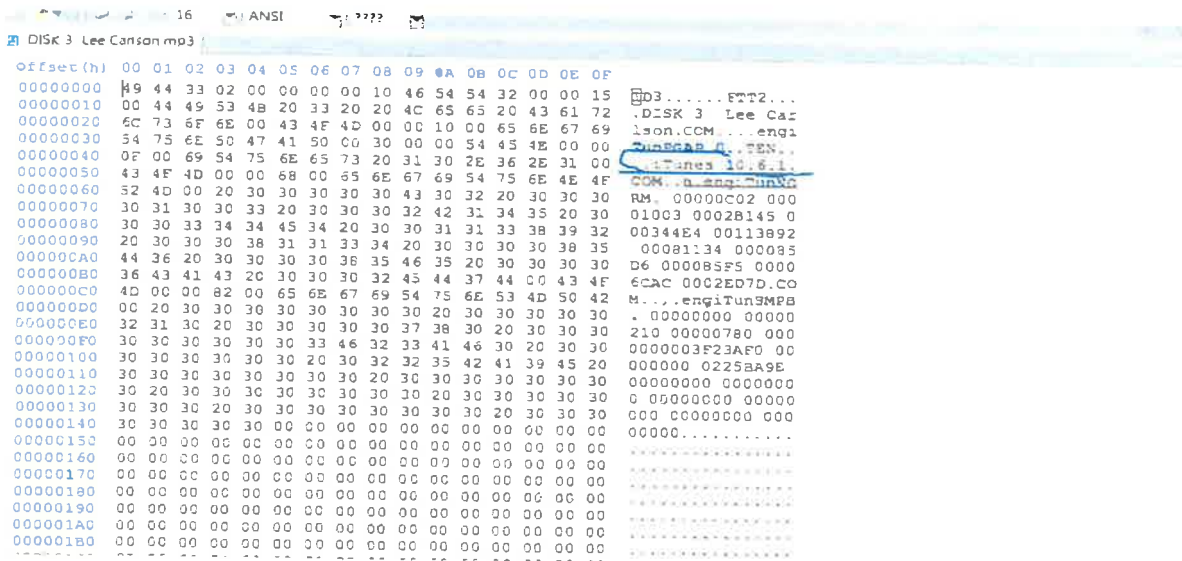


You asked me to conduct a digital audio authentication of this mp3 digital audio recording.

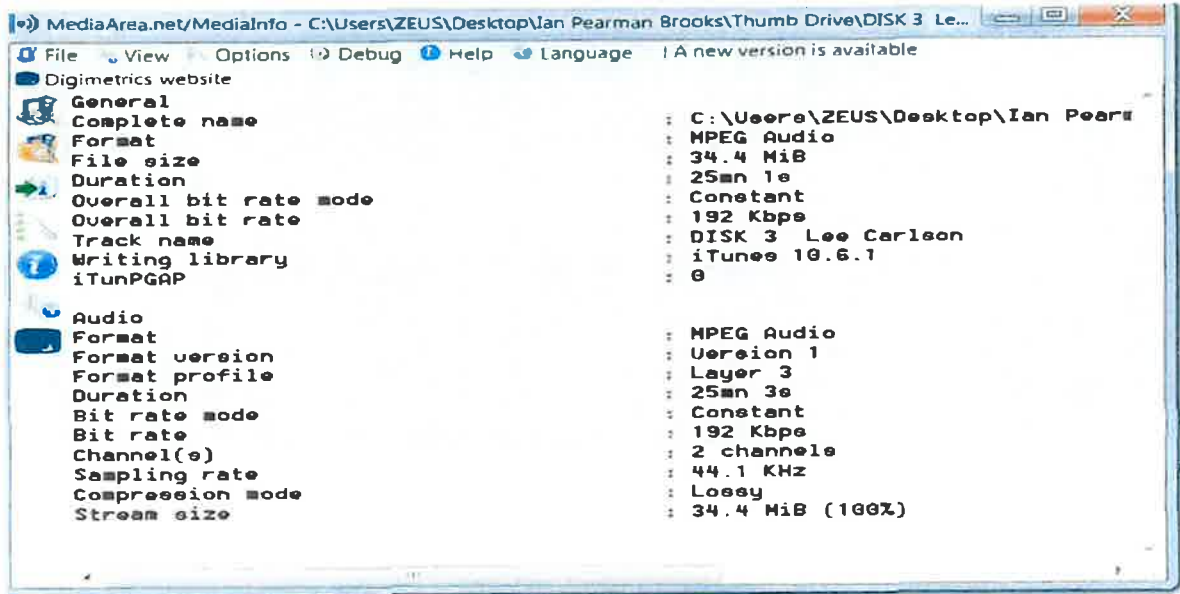
I began the digital audio authentication process by downloading this recording into my forensic computer using Adobe Audition CS 5.5. Next, I listened critically to the recording and made the following observations:

Total recording time: 25:01.335

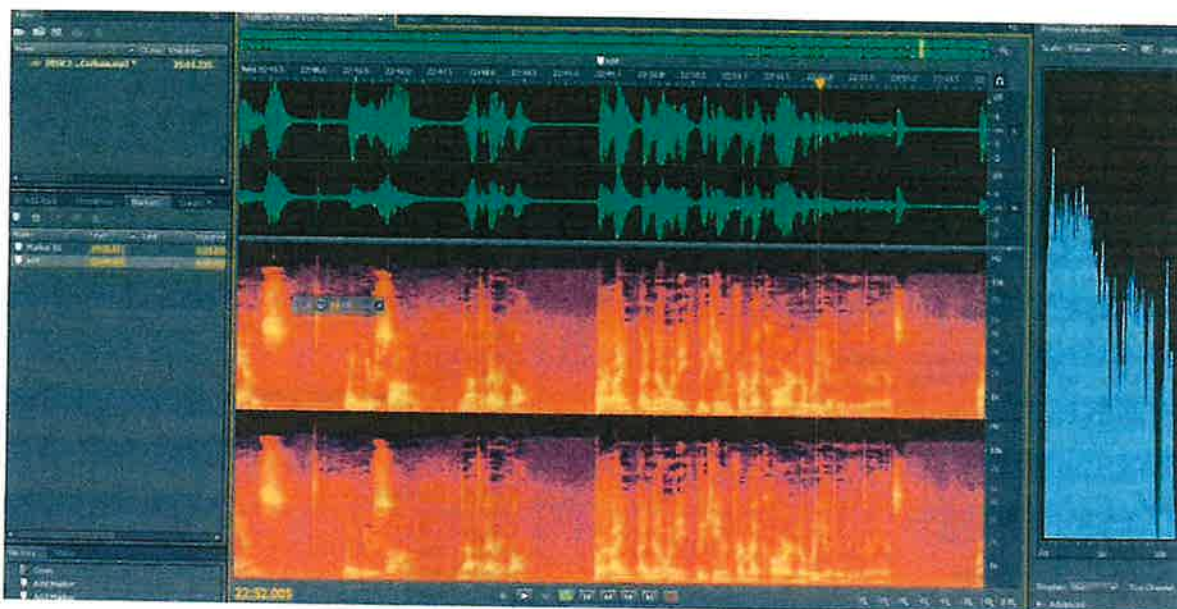
Was created using iTunes (HEX viewer displays iTunes signature):



File information:



The conversation is a recording that has an audio slate in the beginning announcing the person conducting the recording, the date and location of the recording as well as a slate at the end of the recording. During the critical listening process I detected an anomaly at 22:49.4 into the recording which is scientifically identified as an edit. There is an audible and visual jump in the sound and sound spectrum. I believe a portion of the interview was edited out. When listening to this recording critically and viewing the spectrogram, at 22:49.4 I hear and see a clipped word which is the result of the editing or removing a portion of this recording. Below is the spectrum view:



Using narrow band spectrum analysis, wave form analysis and critical listening I confirm the location of 22:49.4 in this recording to have the scientific characteristics of an edit. The above image displays the exact location of the edit. The vertical line in the middle of the above screen capture displays the edit.

Digital audio and video recordings are subject to undetectable editing and tampering. This is why it is extremely important to preserve the originals. Easy to operate software programs that are capable of editing digital audio are easily available for free on the Internet. Editing like this can go undetected to the untrained person. As a video forensic expert, I have been trained in digital audio authentication at the University of Colorado Center for Media Forensics.

As an audio and video forensic expert, I follow SWGDE protocol when recovering and authenticating digital audio evidence. SWGDE ([SWGDE](#)) outlines the protocols for recovering digital audio evidence, none of which have been followed when recovering this digital audio recording you have presented me for authentication. Lack of following established digital audio recovery protocol amplifies every forensic clue the forensic expert identifies when conducting an investigation.

Furthermore, it is crucial to maintain the original recording throughout the course of any investigation so that it may be examined by a forensic expert. According to SWGDE and NIST (<http://www.nist.gov/forensics/osac/sac-agenda-orlando-2015.cfm>), and Bureau of Justice Assistance, U. S. Department of Justice, best practices for recovering digital evidence are:

The purpose of this document is to provide the best methods for the retrieval of video/audio data evidence and any associated metadata...guidance in securing and collecting data... This will ensure that best methods are utilized to retrieve the recorded data and maintain its integrity
[\(read full paper\)](#)

In addition, the best practices for maintaining a chain according to NIST are:

Generally, it is considered the application of science to the identification, collection, examination, and analysis of data while preserving the integrity of the information and maintaining a strict chain of custody for the data

[\(read full paper\)](#)

I conclude beyond a reasonable degree of scientific certainty that this mp3 recording as outlined above has been altered from its original representation of the events that actually occurred; it contains at least one edit, is unreliable and not authentic.

Respectfully submitted,

Edward J Primeau, CFC, CCI