

EXHIBIT 31

From: Steven Donziger <sdonziger@donzigerandassociates.com>
Sent: Monday, December 11, 2017 3:45 PM
To: Katie Sullivan <Katie@Streamlinefamilyoffice.com>
Subject: Fw: Ecuador budget/talk
Attach: 2017.12.09 Ecuador budget.pdf; ATT00001.txt

From: Steven Donziger
Sent: Monday, December 11, 2017 4:44 PM
To: Glenn Krevlin
Subject: Ecuador budget/talk

Glen,

Attached is a budget that shows spending at a rate of roughly \$1m per year for the next two years. We expect to be able to cover the next 12 months under the current raise while actively pursuing new capital up to \$2.5 million under the same terms as the last round in addition to the longer-term and much larger raise indicated in the time line. We now have 80% of the current raise committed if you come in at the level you indicated. We expect the \$1m round to be oversubscribed.


With regard to the terms you requested, we are happy to offer a discount on participation in future rounds. You have been there for us at critical moments and that deserves our appreciation as well as a material reward. I have some ideas about how best to structure the discount to allow us optimal flexibility for the major capital partners we are seeking and whose participation will help put major pressure on Chevron to settle the matter.

Let me know a good time to talk and I will take you through the budget. Katie might join us as she is helping me raise funds. As always, I look forward to hearing your thoughts and insights. Let me know a good time.

Best, SRD

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**Ecuador Case Management - 12 MONTH EXPENSE PROJECTION
DECEMBER 2017**

prepared by	Projected Budget 2018 Monthly	Projected Budget 2018 Annual
		
EXPENSES		
Legal Fees		
Steven Donziger	\$ 25,000	\$ 300,000
Aaron Marr Page	\$ 5,000	\$ 60,000
Full time attorney	\$ 10,000	\$ 120,000
Alan Lenczner	\$ -	\$ -
John Phillips	\$ -	\$ -
Legal contingency	\$ 4,000	\$ 48,000
	\$ 44,000	\$ 528,000
PR costs		
Cristina Munoz - Ecuador	\$ 500	\$ 6,000
Press releases	\$ 1,000	\$ 12,000
	\$ 1,500	\$ 18,000
Stipend Payments		
Simon Billiness - shareholder support/resolutions	\$ 1,500	\$ 18,000
Streamline - administrative/accounting	\$ 2,000	\$ 24,000
Juan Aulestia - Ecuador management	\$ 2,000	\$ 24,000
Luis Yanza - Ecuador community/client relations	\$ 1,000	\$ 12,000
FDA - client group	\$ 3,000	\$ 36,000
Rex Weyler	\$ 2,000	\$ 24,000
	\$ 11,500	\$ 138,000
Travel		
Travel - Ecuador in country	\$ 1,000	\$ 12,000
Travel - Ecuadorians outside country	\$ 4,000	\$ 48,000
Travel - US, fundraising	\$ 8,000	\$ 96,000
Travel - Canadian attorneys	\$ 4,000	\$ 48,000
	\$ 17,000	\$ 204,000
Contingency	\$ 5,000	\$ 60,000
TOTAL	\$ 79,000	\$ 948,000
Onetime payments		
Sept 2017 Canadian Delegate trip reimbursement to SRD		\$ 50,000
Peter Grant legal retainer		\$ 110,000
Reimburse SRD (back salary, direct expenses)		\$ 150,000
Travel - Chief trip to Ecuador		\$ 20,000
		\$ 330,000
2018 projected expenses		\$ 1,278,000
2019 projected expenses		\$ 948,000
TOTAL capital funding required thru Dec 2019		\$ 2,226,000