VIA ELECTRONIC TRANSMISSION

The Senate of the USA COMMITTEE ON THE JUDICIARY WASHINGTON, DC, 20510-6275

COMMITTEE CHAIRMAN CHARLES E. GRASSLEY

c.c: Honorable Dianne Feinstein Committee Deputy Chairman

Testimony of NATALIA VESELNITSKAYA Before the United States Senate Committee on the Judiciary

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Introduction

1. First of all, thank you for giving me this opportunity to cooperate on the questions that the Judiciary Committee has come up with in the course of the Senate investigation.

The answers below have not been coordinated with anyone, including the individuals who attended the June 9, 2016 meeting together with me, and are provided in total ignorance of the substance of testimonies provided by other meeting participants or attendees.

In addition, given that many questions asked by the honorable members of the Committee require disclosing information from the lawyer's docket, I did my best to provide the most exhaustive answers

I could, and support my testimony with relevant documents while remaining within the scope of the authority delegated to me by my client, a representative of the defendants and a party to "Civil case No.13-civ-06326 USA vs. Prevezon et al." (hereinafter referred to as "USA vs. Prevezon"), Denis Katsyv.

In order to enable the honorable Committee members to better understand and evaluate my answers and motives behind my actions and the actions themselves, as well as to understand and evaluate the testimonies of other parties and information collected by the Committee, I hereby ask your permission to make a small preamble.

My name is Natalia Vladimirovna Veselnitskaya. I am a citizen of the Russian Federation. I am a lawyer and a managing partner at Kamerton Consulting, a law firm, and I am licensed to work as an attorney-at-law in the Russian Federation. I operate independently of any governmental bodies. In 1998, I graduated with honors from the Moscow State Legal Academy. Upon graduation, I started working at the Central Administration of the Prosecutor's Office of the Moscow Region where I ended up being promoted to the position of the head of the department for control over legality of the legislation adopted by the legislative bodies of the Moscow Region (the Governor, Government and the Duma). I have been practicing as a private attorney since the spring of 2001. In 2003, I established a private law firm, Kamerton Consulting. I specialize in representing clients that are parties to civil (arbitration) and criminal cases primarily associated with economic disputes or violations.

Since 2013, I have been investigating the activities of William Browder in the Russian Federation. And the fact that today, the Senate Committee and at least three other bodies — two intelligence committees and a special attorney — are investigating me and my colleagues, as well as the US President himself and his friends and family, is a well prepared entrée served by William Browder — a tax fraudster who has been under investigation for 12 years, who was convicted in Russia and sentenced to nine years in prison without the right to ever conduct business again, whose name is on a federal wanted list, and who is a former US citizen who renounced his American passport in order not to pay US taxes ¹-William Browder.

The results of my expert-analytical investigation of Browder's story reveal the motives, causes and possibilities of committing crimes in the territory of Russia and the USA by a group of persons acting in the interests of Browder.

All the information that has become known to me during the course of the advocatory investigation is my intellectual product and the work done without putting any pressure on me, interference or voluntary purposes to suppress someone's illegal actions.

I am not pressured, I do not get paid, and I have no other influence on the part of anyone (including on the part of the Russian government members), giving these commentaries to the United States Senate Committee on the Judiciary.

2. Until recently, my name has been known only to a relatively small circle of my clients and colleagues.

However this summer thanks to Bill Browder's direct and indirect efforts the world has found out about me and my meeting with Donald Trump, Jr. on June 9, 2016, who then was neither the son of a US President, nor was he the son of a single presidential candidate from the Republican Party.

^{1. \(^1\)} Verdict to Browder, renunciation of citizenship, certain investigation acts regarding the case from 2004—Attachment No. \(^2-\) materials from the lawyer's and court docket, part 1.

And our meeting did not take place in a safe house like in the James Bond movies, but in the Trump Tower in New York. We had a very simple and short conversation.

But Bill Browder seems to be trying to prove the opposite.

On July 27, 2017, he showed up at the US Senate Judiciary Committee hearing and told a few fantastic stories. Well, actually, he told a few lies. What is more is that he lied under oath, i.e. he not only deliberately committed a serious moral infraction, but he also committed a grave criminal offence from the point of view of the law. A citizen of Great Britain, Browder, who renounced his US citizenship about 20 years ago out of mercantile considerations, used criminal methods to manipulate US senators and through them — the public opinion in the USA.

3. All my conversations regarding the Magnitsky Act revolved solely around the fact that in 2012, under the pretense of normalizing the trade relations with Russia, dictated by a group of self-serving profiteers, an act was passed that was based on a mendacious story that has been used to incite hatred between our countries, undermine social and mental relations, including the introduction of an adoption ban, and to manipulate public opinion and politicians.

Magnitsky had never been a lawyer, nor had he ever investigated or reported a theft of \$230 million US from the Russian treasury; he had never been arrested for that, nor was he asked to rescind his testimony; he was never beaten and he did not die of beatings and torture, including beatings and torture for his alleged refusal to rescind the allegations that he had never made, at least not until after he was arrested. After 10 months in his court-imposed custody, Magnitsky (who had been interrogated 9 times and 12 times had appealed to the court regarding his detention (each two months before the court of first and second instances) had not mentioned anything of the kind that could resemble the wordings Browder repeatedly (more than 10 times) used in July 2017 at the meeting of the Senate Committee: "uncovered a USD 230 million tax fraud, testified against corrupt police officers who put him under arrest for that.") on October 14, 2009², read to investigator Silchenko a previously concocted statement he had received electronically, which, four months prior to that, had been spoken about by his employer, William Browder³, in New York, at the Senator Cardin's Helsinki Commission meeting. One month later Magnitsky died. The criminal case concerning a theft of 5.4 billion roubles (which is about 217 not 230 million dollars) from the Russian treasury was not initiated based on reports submitted by Magnitsky or anyone else from among Browder's employees, and it had been investigated by the Russian law-enforcement authorities before Magnitsky's arrest. Magnitsky was never interrogated under that case nor was he prosecuted under that or any other criminal case other than the one under which both him and Browder were accused of conspiring, in 2001, to commit tax fraud involving false recruitment of people with disabilities and without appropriate education in the capacity of financial analysts of Hermitage Fund. And if Browder, who has been absconding from law enforcement authorities since 2008, and has been under investigation since 2004, had a real desire to get Magnitsky released from custody, nothing would have prevented him from paying his past due taxes in the amount of approximately \$19 million USD that were detected by the tax authorities as early as 2003 and 2005 and were found to be fraudulent tax evasion by courts held with participation of Browder's employees and the case would have been closed in compliance with the Russian laws. Browder, however, chose a different tactic – in May 2008, he hired a US lobbying firm of Jonathan Winer, a former assistant to the US Secretary of State, and went to Congress to lay down the groundwork required to obtain immunity for himself and attack the entire Russian system. And

^{2. &}lt;sup>2</sup> Testimony of Magnitsky from 2006 to 2009 and analysis of testimony with due regard to Browder' web site.

^{3. &}lt;sup>3</sup> 2009.06.23 testimony of Browder to the U.S. Helsinki Commission 422-15

when Magnitsky, who was getting ready for trial, and after reading for the record the statement that was delivered to him on an electronic medium by an unknown person died in the pretrial detention facility, Browder and everyone behind him who had theretofore been silent about him acquired at least an opportunity to use Magnitsky's death to turn him into a martyr and to create a picture of all-consuming corruption in Russia in case someone in the USA decides to start investigating the real facts of their illegal actions and crimes they may have committed against the American people. I have named these people before and I will name them again: William Browder, and a group of unidentified individuals from the American corporation ZIFF Brothers who in 2007 profited approximately US\$1 billion from the criminal activities committed in the territory of the Russian Federation, including, as it became known later⁴, 66 million shares of the Russian gas giant having concealed from the USA controlling authorities the entire story of the high yield investing in Russia. I sent this information to the investigation authorities and the Russian General Prosecutor's Office⁵ in October 2015 and was prepared to provide this information, alongside all the details and supporting documents, to any US politician or journalist, including Mrs. Clinton, which I have always spoken about as well, including in all my written comments and video interviews and which was not broadly covered by mass media⁶.

4. Despite to the far-fetched view promoted in the media that I have fought against the sanctions – it is not true. Fighting against something that has absolutely no legal bearing makes no sense, and my client has never been listed in those "Magnitsky Lists." Not a single penny has yet been frozen under that law, and the prohibition of entry to judges, prosecutors and investigators (for their work that would be similarly done by their American colleagues) is a matter of their personal defamation. These people were simply slandered.

But, as an independent person, I personally believed and still believe that the doctor who negligently treated a man who needed medical help when he started hallucinating – had to be punished, but they were just fired. But it still has nothing to do with the amount of tall tales that have been inserted or falsified, not without assistance of those who keeps close communication and contact with Browder's staff in London such as Borschev, whose report has been detected in two different versions. And it is not known which one of those versions was taken as a starting point when passing the Magnitsky Act⁷.

The Russian Human Rights Council had not determined Magnitsky was beaten and tortured in prison. But Browder and Magnitsky Act conclusions impose the preliminary report of the Human Rights Council under the President of Russia as evidence that Sergei Magnitsky was beaten and tortured in prison. However, the report clearly states that it is not a report by the Presidential Council, but it expressed the preliminary opinion of the Council's working group, which is still subject to finalizing, because "a comprehensive investigation by the competent authorities of all the circumstances of … Magnitsky's death has not completed." One of the members of the Working Group, Kirill Kabanov, stated under oath in the US that the preliminary report by the working group (and Borschev's report quoted in it) have been prepared for the most part based on unverified material provided by William Browder and his lawyers, some of which were full of errors, for instance, Magnitsky was called a lawyer therein, or claimed to be a whistleblower. He further stated that "since then the Human Rights Council has collected additional information" and "at the moment, the Human Rights Council can't say what will be their conclusions regarding the facts after obtaining more evidence."

^{4. 4 2016.09.05} Answer from GPO to NV

^{5. 5 2015.10.05} NV-GenPro (eng) and 2015.10.05 NV-GPO

^{6. 6 2016.05.31} Talking-Points-Memo

 ^{7. (}http://russian-untouchables.com/docs/D24.pdf). The Russian original does not contain the same statement. (http://russian-untouchables.com/rus/docs/app 1.pdf).

^{8. 8} Kabanov's Declaration – see Dkt. 419.

5. The reason I started analysing his activities had to do with the need to defend my client, Denis Katsyv, a Russian citizen, who had created several companies in the USA that were members of the Prevezon group, purchased real estate properties on their behalf and rented said properties out to third parties from among American companies and citizens. My client has been conducting business in the USA since 2010 in an open, transparent fashion, taking out and repaying mortgages and paying all applicable US taxes, without hiding himself behind any offshore entities.

On December 4, 2012, Browder sent a letter to the US Attorney's Office against my client, Denis Katsyv, a Russian citizen, claiming that my client was doing the aforementioned business using funds stolen from Russia as part of the "theft uncovered and exposed by (his) lawyer Magnitsky for which he was thrown into jail without due process, tortured and killed". This happened on the eve of the day on which US Senate voted (in a rather pro-forma fashion) and passed the first and one of a kind US statute which, with all due respect to the legislative body, is the result of manipulation and slanderous allegations and has for many years, if not forever, changed US foreign policy and created the foundation for incitement and fomentation of a cold war between our countries whose imagery and scale are unparalleled compared to the 1960s - 1980s.

On the eve of the 12th anniversary of the 9/11 tragedy, the NYC South District Attorney's Office issued an explosive press-release: "In 2007, a Russian criminal organization implemented a fraudulent tax return scheme and illegally reclaimed about US\$230 million worth of taxes from the Russian budget... PREVEZON HOLDINGS laundered the fraudulently obtained funds through its member companies dealing in real estate, including investments in several high-end commercial spaces and luxury condos in Manhattan, and created several other companies that are also within the scope of the property forfeiture lawsuit" ¹⁰.

Since then, I have personally examined more than 600 court decisions and 50 civil (commercial) cases, as well as 14 criminal cases featuring Browder, as well as executives and personnel of the companies under his supervision. In addition, I have examined verbatim reports of the interviews of more than 100 suspects and witnesses who had testified under Browder-related court cases. I personally interviewed over 15 people associated with the events mentioned in the US Magnitsky Act. I have examined dozens of thousands of pages of documents I collected describing the activities of Browder and his companies in Russia and abroad. I took part in the preparation and conduct of the interviews of all the witnesses and some of the US Government experts under the Prevezon case (14 individuals), including that of William Browder who, upon decision of US court, was interviewed under oath twice, had been investigated in Russia since 2004, was convicted in Russia for tax fraud and has ever since been on the federal wanted list. I have spent two and a half years of my life investigating this character and the entire group of people who have been helping him in Russia, London and the USA. I have personally examined more than five thousand documents on his firm's operations in Russia, including all, without exception, Russian court cases and some of the US court cases. I have gone through the entire Browder's website archive, all his interviews, all his speeches, and hundreds of articles on the subject. This was all part of my job defending a specific person from the false accusations claiming his involvement in the Browder/Magnitsky case.

^{9. 9281.42012.12.04} Compl. of HCM-Browder to NY County District Attorney (part 1)

^{10. 10} US Attorney's Office press release in the NYC South District of September 9, 2013. The US Attorney for Manhattan has announced filing a civil lawsuit seeking to confiscate the property of several companies dealing in real estate and presumably complicit in laundering the money obtained from the Russian fraudulent tax return scheme, US Attorney's Office in the NYC South District, 2013.

The results of my analysis have demonstrated that the entire structure that Browder has been using to gain unprecedented access to senators and congressional representatives, European politicians and journalists is nothing but a well-packaged lie. The Magnitsky Act and its European analogues are the result of manipulation of people and their values for the sole purpose of ensuring personal immunity from criminal prosecution. And not so much in Russia, as much in the USA. The Magnitsky Act has rendered Browder untouchable but also a hostage of a fictional story.

Here is the reality: Sergey Magnitsky was an accountant who had been working on criminal tax evasion schemes for Browder's group since 1996. No one has ever stolen any companies from Hermitage. They have always been controlled by Browder, including the time when they submitted their tax return declarations in September and October and the time when relevant tax amounts were returned to their newly opened accounts in December. Not the HSBC accounts, otherwise how can one explain the millions of dollars reserved in advance to regain control over the companies that no one had ever stolen but only pretended to steal?

It took me a year to bring my investigation results to the attention of our lawyers who believed in them only after the interrogations of government officials, Browder's employees, and representatives of the HSBC bank whose structure included Hermitage. But the interrogation of Browder was, undoubtedly, the most shocking one. He had avoided the interrogation three times and it was not until after we video-recorded him being served with subpoena from which he attempted to run away down a snow-clad Manhattan street that the judge obligated him to show up in court and make a deposition. The man was completely amnesiac, barely spoke, and remembered nothing, not even whether he had ever asked anyone to get Magnitsky to take responsibility for his crimes solely upon himself¹¹.

After that, our lawyers presented some of our arguments in court, claiming that Browder had had motives and grounds, as well as a possibility to defraud Russian budget. And we paid a high price for that. Browder succeeded in getting our lawyers disqualified using the fact that one of our lawyers had briefly worked for Hermitage many years before.

6. I was defending a client who had legally entered the USA, invested his capital that no one so far has been able to prove to have been dirty, acquired several real estate properties, took out mortgages at American banks to buy more property, and then, all of a sudden – two months elapse since the date of the most recent transaction – all that is seized and claimed by the district attorney's office to be property purchased using the money that had allegedly gotten a Russian fellow – Magnitsky – killed.

In September 2016, following almost a year of hearings on disqualifying the Prevezon lawyers on the grounds that in November 2015 a lawyer stated in the course of a court hearing that it was Browder who had a motive and foundation to embezzle money from the Russian Federation, the court of appeals sustained the demands of Browder's lawyers to disqualify our US lawyers in view of the fact that one of them interacted with Browder back in 2008 and the latter, allegedly, shared with him "confidential information" which, however, no one has ever heard. In January 2017, to defend a Russian citizen, I hired a new law firm specializing in court cases. All of the new lawyers (three in total) are former state attorneys. In addition, the case was reassigned to a new judge, William H. Pauley III.

Within a short time, Judge Pauley managed to examine important issues affecting the progress of the case.

^{11. 11} The video showing Browder being served with subpoena, the decision of judge Griesa, the verbatim report of the court hearing of March 9, 2015, and Browder's testimony of April 15, 2015.

On February 17, 2017, the court dismissed the US Government's petition to add to the case 40 thousand pages worth of new evidence that the US Government had spent a whole year collecting in different countries upon considerate instructions from Browder.

The judge subjected the US Government to harsh criticism, and not only for this particular part, having pointed out to the graphs and charts indicating the movement of money from the RF budget to, allegedly, Prevezon, identifying them as "inconceivable": "JUDGE: This chart reminds me of General McChrystal who once said, looking at a Power Point presentation slide: "If I could understand what is drawn here, we would have won the war". I can tell you that with a chart like this you will never win a war".

Ten days later, Judge Pauley sustained the petition of the defendants (Prevezon) concerning the second day of Browder's interrogation, pointing out that all attempts to present Browder as a marginal player must be recognized as "insinuations" and Browder himself—as "marginal centre of the case":

"The attempts to present Browder as a secondary witness are an insimuation disproven by the active role he played in the provision of information to the government, his merciless blitzkrieg in the media and his multiyear yet unsuccessful attempts to avoid testifying in court. All these actions, however, were overshadowed by Browder's petition to disqualify a Prevezon lawyer in December 2015, which emphasizes his significant role in the present court proceedings." 12

The analysis of the testimony provided by four US Government representatives, five US Government experts, seven HSBC and Hermitage witnesses (including Browder twice, in 2015 and 2017), and other written evidence made it possible to identify multiple evidence proving the fictitious nature of the story that was used as the foundation of both the lawsuit and the US Magnitsky Act. It was also established that the US law-enforcement authorities had never conducted an independent investigation and that all information had been obtained from the sources designated by Browder's group, including the Magnitsky Act and the two reports – that of the Human Rights Council under the RF President (2011) and that of the Supervisory Commission for Control Over Pretrial Detention Facilities of the City of Moscow (2009) mentioned therein, as well as the report of the Swiss deputy Andreas Gross at the European Parliament (2013).

The US Government refused, of its own accord, to use in the course of the court proceedings the US Magnitsky Act and the two Russian reports and asked the judge to leave only Andreas Gross's report based on which the European Parliament had passed the resolution "On condemning Russia for the death of Magnitsky". But Judge Pauley excluded this document from the case identifying it as subjective, questionable, unverified and undebated in parliament, and accused Gross of partiality and motivated nature of his conclusions, taking note of the fact that "Browder's sudden appearance at the parliamentary seminar" on the day on which Gross was to be appointed as reporter was not a random coincidence¹³.

The judge also excluded a connection between Magnitsky's arrest, conditions of custody and death and the embezzlement of funds from the Russian budget, acknowledging, for the first time, that Magnitsky had spent years working as a financial analyst for Browder's structures and that Browder had had no moral obligations to conduct a blitzkrieg-style propaganda campaign on his behalf.

At the same time, Judge Pauley recognized that the sentence passed by the Russian court on account of Browder's tax evasion that contained undisputed facts of fraud and wrongdoing committed by

^{12. 12 566. 2017.02.27} MEMORANDUM AND ORDER ab. sec. depo Browder

^{13. 13} Documents from the Prevezon case:

Browder indicate that he had had motives to play an exceedingly active role in this case and that his testimony could be doubted by the jury 14 .

Realizing the risks associated with presenting its case to the jury even in the conditions of today's brutal anti-Russian propaganda in New York, the US Government agreed to close the case in exchange for defendants pleading not guilty, dismissing the lawsuit as groundless, and foregoing property forfeiture in exchange for a compensatory payment of \$5.8 million US or less than 3% of the original claim.

7. The closure of this case precluded Browder from legalizing a false version of his own non-involvement in a number of crimes committed in the Russian Federation and from refocusing the attention of the RF and US law-enforcement authorities away from the actual facts of tax fraud systemically committed by Browder's group in both countries.

Today, more than ever before, I deem it my duty to relay this information to the US politicians, state attorneys, and American people, because the amount of hatred and defamation I am facing now alongside everyone who has ever met me or worked with me has become so inordinately egregious.

1. All documents related to the June 9, 2016 meeting, including all documents related to planning the meeting, topics discussed at the meeting, and any subsequent work related to the meeting. Please include any documents you (a) received at the meeting, or (b) brought with you to the meeting, including any documents you referenced, showed, or gave to anyone at the meeting, and any documents you left behind.

Meeting planning documents:

1.1 A note about the meeting that I prepared in Moscow on or about May 31, 2016 for its possible handover to any interested party¹⁵. I prepared this note myself based on the documents from my lawyer's docket; partial disclosure thereof has been authorized by my client, Denis Katsyv. This note was preceded by an inquiry I submitted to the investigation department of the RF Ministry of the Interior in August 2015 and the RF Prosecutor General's Office prior to my first trip to the USA in October 2015. In 2015 – 2016, I was asked by the investigation authority and the Prosecutor General's Office to participate in the examination of the documents impounded in Cyprus from the companies specified in my inquiry. In addition, I examined the expert materials concerning the movement of stocks, as well as the criminal case materials. By May 2016, I had found out that the assumed income increased by 66 million shares of Gazprom OJSC and was withdrawn under the guise of paying dividends from Russia to Cyprus and then from Cyprus to Ziff Brothers' US companies totalling about \$1 billion and likely was concealed from the US regulatory bodies ¹⁶.

1.2 Exchange of letters between me and Mr. R. Goldstone 17

Documents that I brought with me to the meeting – see 1.1. foot-note 1

Documents of further activities related to the meeting – not available because no meeting-related documents have been drafted following the meeting

^{14. 14 723. 2017.05.03} Hearing Transcripts_eng_review of pretrial petitions

^{15. 15 2016.05.31} Talking-Points-Memo

^{16. 16 2014.11.14} NV-GenPro (eng)

^{17. 2015.08.28} SD MIA

^{18. 2015.10.05} NV-GenPro (eng)

^{19. 2015.10.05} NV-GenPro

^{20. 2016.09.05} GenPro-NV

^{21. 17} email w Goldstoun

Documents I referenced to at the meeting:

I do not remember that I referenced anything but the Magnitsky Act (USA), the law banning adoptions (Russia) and the sentence on Browder (and then possibly by mentioning that he was "sentenced for tax fraud"), however, neither the mentioned documents nor any of the thousands of pages I used as evidence in my investigation did I bring with me to the meeting as there was no need in bringing them. It is my understanding that this meeting should have been of a referencing nature where I would have been referred to people of my interest, i.e. Congressmen or Senators interested in legal integrity in adopting laws in the USA and conducting investigation of the situation where, the USA, without doing any due diligence on 1) the data provided by Mr. Browder who had been under criminal investigation for 12 years by that time and 2) disseminated by his registered and not registered lobbyists and 3) the motives of submission of such data, adopted a public law that in my opinion initiated the beginning of the end of normal allied relations between our countries, their citizens, the negative consequences of which for each of us are difficult to overestimate.

Documents relating to the issues discussed at the meeting

Exhibit 2: part of the materials, on which the investigation relies and which reflect the results thereof.

2. All communications to, from, or copied to you, to, from or related to any Trump campaign officials or family members.

Not available and have never been available.

3. All documents concerning the Russian influence campaign in connection with the 2016 U.S. presidential election.

Not available and have never been available.

Nor do I know anyone who would be in possession of such documents or knew about something like that.

4. All documents concerning the hacked emails belonging to the Democratic National Committee (DNC), John Podesta, Hillary Clinton, or the 2016 U.S. presidential campaign of Hillary Clinton.

Not available and have never been available.

5. Please provide all documents related to Fusion GPS or Christopher Steele.

Not available and have never been available.

I do not know Christopher Steele. I first heard of him from US media.

I did not work with Fusion GPS, I know Glenn R. Simpson, whom since 2014 I have viewed as an individual investigator-analyst, a former investigative journalist with a long record of service and experience gained by a team of lawyers for point tasks that arose in connection with the preparation for trials, interrogations under case 13-civ-06326 the United States of America v. Prevezon Holdings Ltd. et al., initiated by Browder through the US Attorney's Office with reference to my client. In my perception, it was Glenn R. Simpson who worked on the Prevezon Case, as to in what capacity – either

as an individual or as a company – it was of no interest to me. I do not have any documents as to Fusion GPS.

Pre-June 9, 2016 Meeting

6. Whose idea was it to meet with the Trump campaign?

Meeting on June 9, 2016, was not a "meeting with the Trump campaign". My understanding is, this was to have been a private meeting with Donald Trump, Jr., – a friend of my good acquaintance's son on the matter of assisting me or my colleagues in informing the Congress members as to the criminal nature of manipulation and interference with the legislative activities of the US Congress. I do not remember from whom and at what time I first heard that I could personally express my request (see Exhibit 1.1) during at the meeting. When I was informed that I could hand over the request in person, I agreed, as this was one of the ways to file it.

a) If it was your idea or request, why did you want a meeting? Who did you ask to arrange the meeting and how did you know that person?

I had never asked anyone for a meeting with the Trump team.

Nor did I ask to organize *namely a meeting* with Donald Trump, Jr., it was enough for me to hand over a reference outlining the request (see Exhibit 1.1). Around the end of May 2016, during a conversation with a good acquaintance of mine, being my client, Aras Agalarov on a topic that was not related to the United States, I shared the story faced when defending another client, Denis Katsyv, about how terribly misled the US Congress had been by the tax defrauder William Browder, convicted in Russia, who, through his lobbyists and his close-minded rank-and-file Congress staffers, succeeded in adopting the Act in the name of a person whom Browder practically hardly ever knew.

I considered it my duty to inform the Congress people about it and asked Mr. Agalarov if there was any possibility of helping me or my colleagues to do this. I do not remember who of us was struck by the idea that maybe his son could talk about this with Donald Trump, Jr., who, although a businessman, was sure to have some acquaintances among Congress people. After my conversation with Mr. Agalarov, I prepared a reference in case it would be necessary to hand over the request – to support the hearings in the Subcommittee in the US House Committee on Foreign Affairs as to the Magnitsky's and Browder's story, scheduled for mid-June. I was ready to hand over the reference, talk on the phone, or meet personally.

b) If it was not your idea or request, who first informed you of the meeting? When? How did they inform you? (In-person, by email, by telephone?) What did they tell you about it?

I do not remember the moment when I first heard that I could personally make my request during a meeting. Nor do I exactly remember who told me about it. But upon arrival in New York in the evening of June 8, 2016, in my e-mail box I found a letter from a certain Goldstone, who notified me of the time and place of the meeting with Donald Trump, Jr. In this correspondence Aras

Agalarov's colleague, Irakli Kaveladze, who had been living in the United States for a long time and to whom I left my mail for contacts, was mentioned in the copy.

7. Did you ask anyone to attend the June 9 meeting? If so, identify who you asked to attend, when you asked, the circumstances under which you asked, and why you asked that person(s) to attend.

On the day of the meeting – June 9, I asked my interpreter – Anatoly Samochernov, and my colleague who had previously worked on the Prevezon Case – Rinat Akhmetshin, who was also a registered lobbyist for the Human Rights Accountability Global Initiative Foundation (HRAGI), and dealt with issues on behalf of the Foundation in the US Congress, which I planned to talk about at the meeting with Donald Trump, Jr. Both are US citizens. I informed Goldstone about them on June 9, which is confirmed by my correspondence (see Exhibit 1.2.)

8. Were you asked to attend the meeting as a representative of or on anyone else's behalf? No, I was not.

If so:

a) By whom and in what capacity were you asked to serve?

By no one.

b) Did you disclose to the other meeting participants who you were representing?

I introduced myself as a Russian lawyer who, as a result of collecting evidence on the US case, had conducted investigation and revealed false statements and testimonies in the Congress by the former American citizen, William Browder, convicted in Russia for tax crimes, who had the motives and opportunities to manipulate and mislead the US Congress in order to obtain the immunity status not only in Russia, but also in the US and countries of Europe. Attempts to resume the trust undermined by the criminal and his accomplices in the Congress were dealt with by the Human Rights Accountability Global Initiative Foundation that I consulted as to the circumstances of my investigation.

9. Did you discuss the meeting with anyone else before the meeting occurred? With whom, when, and what did you discuss?

I do not remember discussing it with anyone before I found out that there would be a meeting. This was an alternative way of communicating the request and I did not insist on a meeting. The day I was told that I would be met by Trump, Jr. (everything that I was able to restore in my memory, confirmed by mail from Goldstone – this could take place when I was already in New York), I informed Denis Katsyv about this.

10. What information did you receive about the meeting before it happened?

All I got can be found in the Goldstone letter – see Exhibit 1.2.

11. What was your understanding of the purpose and desired outcomes of the meeting?

A request addressed to Trump, Jr. was to support the forthcoming hearings at the Subcommittee in the US House Committee on Foreign Affairs with the participation of Andrei Nekrasov and, possibly, with my participation.

The ultimate goal was a Congressional investigation into Browder's activities, the motives and sources of funding the lobbying campaign for his interests, and at the same time his involving both parties in his own self-seeking interests, who lied at least twice in 2012 and 2015 in the US House Committee on Foreign Affairs.

c) How did you come to understand that purpose?

1. First, having conducted an investigation based on the documents gathered in the US and Europe, as well as in Russia with the help of the team of analysts and investigators that I engaged, I have concluded unequivocally that Mr. Browder's story that he told in the US House Committee on Foreign Affairs in 2012 is a synopsis of a work of fiction.

In 2012, four years after the officially registered lobbying campaign in the US legislature to promote the interests of the Hermitage Capital Management Limited (Guernsey) headed by Mr. Browder and formally unrelated to the US, Browder finally managed to address with a brief statement the US House Committee on Foreign Affairs (http://www.youtube.com/watch?v=56g3nxY8htQ).

That ten-minute story had been polished to perfection for years and was certain to cause human condemnation and indignation; it brought about the adoption of the Magnitsky Act (Sergei Magnitsky Rule of Law Accountability Act of 2012)¹⁸ and hence a drastic deterioration of the US-Russia relations. Nobody but Mr. Browder and his team has gained anything from that. Fugitive from justice for over seven years, he nevertheless managed to present himself as the only authority on matters of corruption, human rights and laws in Russia. An accomplished media manipulator, Mr. Browder has convinced the public of his role as a victim and publicized the story of persecution, first and foremost his own persecution of himself.

He compressed his story into ten minutes (fight against corruption, persecution, hiring a lawyer, disclosure, persecution of the lawyer, imprisonment, tortures, refusal to rescind the allegations and death) yet enhanced it with two important external elements: a heartbroken mother and many thousand pages of court proceedings and criminal cases, mostly in Russian.

This simple and cynical formula did its job. The ten-minute story was accompanied by photographs of Sergey Magnitsky, alive and charming, followed by pictures from his funeral depicting his grieving mother. Voluminous folders of some documents were presented that allegedly proved everything said in that ten minutes, and to conclude, pictures of unknown yet luxurious villas, cars and other attributes of the life of luxury were demonstrated to support the words that all that had been stolen by people who killed Mr. Browder's friend and the lawyer who had protected him.

^{22. 18 2012.12.12} The Nation-Is Congress's Magnitsky Bill a New Blacklist

Pursuing an aggressive campaign across the world, Mr. Browder, nevertheless, has opposed for a long time any attempt to retrace the exact chronology of his commercial activities in Russia and to find an explanation for his herculean lobbying efforts in both the US and European government bodies. Unlike in the "independent" media conditioned in advance, Mr. Browder behaved very differently in April 2016 as he was making a statement during the court proceedings he had initiated against Russian Businessman Denis Katsyv. This time he did without the mantra-like key points of his story he had repeated hundreds of times before. As a clever manipulator and accomplished technician he understood that for the first time he found himself in a situation when telling outright lies, so far unchallenged, he could and would have to answer pointed questions as to the facts (indeed, he would have to answer them, or face the punishment for contempt of court). In this case, for all the seven hours of his interview, Mr. Browder chose to be as evasive as possible, "forgetting" either the source of information or the very events. His most popular answer was "I don't know", he resorted to it over 250 times. ¹⁹ Yet his memory improved dramatically two weeks later when he addressed the subcommittee of the Committee on Foreign Affairs during the hearing on the Global Magnitsky Act. ²⁰ There was nobody who knew the real story.

2. Yet "truth is like the sun, you can shut it out for a time, but it ain't going away".

The same was true of the real facts pertaining to what happened to Mr. Browder and his companies in Russia. Guided by the Roman principle "Cui bono?" I have undertaken an investigation of every event that Mr. Browder mentioned since 2013 and checked it against the very documents that were available in abundance on his websites.

My colleagues and I have analyzed everything Mr. Browder said and cited, studied thousands of pages of other additionally collected documents and unequivocally concluded that no companies were stolen from the Hermitage Fund. Those companies were controlled by the persons hired by Mr. Browder's people to complete the scheme under which a theft of companies by former convicts was imitated in order to subsequently transfer budget money to the accounts of the allegedly stolen companies. This conclusion is confirmed by records of searches, examinations and inspection of stamps, including of those that were possibly performed without Browder and other managers' knowing by lawyers involved who started to doubt (Mr. Khairetdinov), the statements by Mr. Magnitsky and Ms. Guzheva, the analysis of 46 arbitration cases on these matters, the chronology of the dates, and the examination of conclusions against nine statements by witnesses in the USA vs. Prevezon case. Part of these materials is attached in Annex 2 as documents related to matters discussed at the meeting (Question 1).

What Browder is silent about

Having practically moved to Moscow in 1996, Browder retained a consulting firm, Firestone Duncan, owned by an American citizen Jamison Firestone, permanently residing in Moscow since 1992. Back in 1996, Sergey Magnitsky, a young economist who had graduated from the Finance

^{23. 19} Doc/ 252, 261, 281, 281.1. 281.2, 479, 566

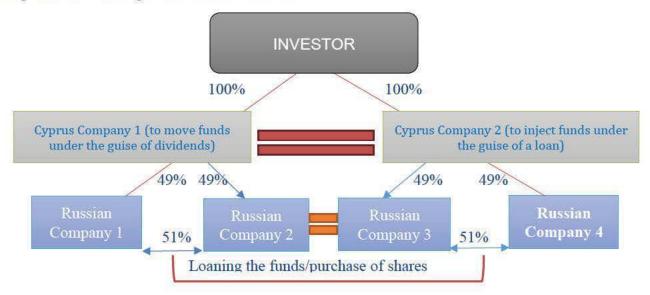
^{24. 20 2015.04.29} HHRG-114-FA16-Wstate-BrowderW

Academy in 1993, joined Firestone's company. Firestone's employees developed a plan for Browder to build a scheme to purchase shares of Russian joint stock companies whose value, as later repeatedly recognized by Browder, was underestimated by all the most experienced western financiers.

For this purpose, Browder's group created an extensive chain of Russian legal entities beneficially owned through Cyprus offshore companies, whose authorities were only limited to the transfer of borrowed funds from foreign investors to buy shares, and signing decisions for distribution of dividends to their own benefit.

Using the Kalmyk tax optimization scheme which is now recognized by international courts as illegal, Browder's consulting teams implemented a scheme for buying Gazprom shares in the domestic secondary securities market on behalf of formally Russian companies, which in reality had only foreign capital and owners. During the period of 1997 through 2005 Gazprom shares could not be in the direct circulation with foreign companies, but only through the acquisition of American Depositary Receipts (ADRs) at that time traded at 100-150% higher price than stocks in the domestic market.

In order to purchase cheap shares of strategic companies, including Gazprom, a looped corporate asset management scheme was used:



In that scheme "Investor" is the owner of two Cypriot companies registered on the same day at the same address, with the same directors. Each of the Cypriot companies holds a 49% stake in two Russian Companies, also created on the same day, at the same address in Kalmykia, with the same director (up to 2001 it was Browder, then he was replaced by Firestone's employees: Bokova, Guzheva, Magnitsky, Dorofeev and others, and before the final withdrawal of assets from Russia, they were replaced either by the UK citizens Wrench and Wilson, or by Browder's partner Ivan Cherkasov, residing in the UK since 2006). Both of the Russian Companies, though created on the same day, hold the stake of 51% in each other. This circumstance – the excess of the share of the Russian company by 50% in the absence of a unified register of legal entities and in view of the fact that this information was stored at the local (not federal) agencies, allowed continued hiding of the fact that Russian

companies were in fact owned by foreign legal entities, which created the appearance that Gazprom shares were acquired by a Russian Company in which foreign capital held a share less than 50%.

The money was transferred back from the Russian companies under the guise of distribution of dividends and the repayment of borrowings. The Cypriot superstructure was used solely for the purpose of minimizing taxes on dividends of foreign companies by applying a reduced rate of 5 % instead of 15% under the 1998 Agreement made between the Government of the Russian Federation and the Government of the Republic of Cyprus. Paul Wrench – one of Browder's main supporters – confirmed this in his affidavit (paragraph 16 of Paul Wrench's Affidavit of July 2008 filed with the Supreme Court of the British Virgin Islands).

In addition, a tax optimization scheme through Kalmyk economic zone was used, through which Browder's companies managed to halve the regional taxes. However, in order not to pay federal taxes in full, mentally deprived persons, persons disabled since childhood, who did not have the skills, experience and education in finance and economy, but as it turned out they did not even understand what documents they were signing as financial statements of the hedge fund, were ostensibly hired in 2001 by Browder personally, and by Sergey Magnitsky who worked for him as an accountant, under fictitious contracts, as financial analysts to work in those Kalmyk companies controlled from Moscow. Never using the labor of disabled persons, but their signatures, the group of persons working for Browder thus sought to reduce income taxes from 35 % to 5.5 %.

They made a cottage industry out of these activities, and it brought in high profits equal to no other financial business Browder's former colleagues from the Wall Street were in. Nobody knows how long it could have lasted. But since 2002 a serious administrative reform started in Russia. All the information on the registration of companies was to be transferred from the local authorities to the federal tax authorities. After information exchange and fusion effected in 2003, Browder's whole business scheme in Kalmykia based on bogus documents and false information was under the threat of disclosure. And the first inspections of the tax authorities in 2003 found out fictitious registrations of Hermitage Fund companies – Dalnaya Step and Saturn Investments.

Standing on top of the oligarchic structure of the Yeltsin Era, Browder sought to win support of many Russian politicians. But in 2004 Kasyanov's government was dismissed, tax and registration services reform and reshuffle in the police took place.

Arrears of income tax revealed by the tax authorities in 2003 in respect of Dalnaya Step and Saturn Investments which for just the tax period of 2001 amounted to a sum equivalent to USD \$19 million, later in 2003-2004 were confirmed by the courts. However, instead of paying the taxes additionally accrued, Browder's group reorganizes the entire Kalmyk-Cypriot offshore structure, reducing the bulky, extensive corporate asset management scheme from about 20 to 4 "parking" companies, registering them at new addresses in Moscow. By mid-2005 all the assets that were acquired from 1996 through 2001 were accumulated in three companies, which were part of HSBC structure, managed by Hermitage, namely Rilend, Parfenion, Makhaon, and a company called Kameya which was not part of Hermitage, its ultimate owners were two New York companies – Speedwagon Investors I, Speedwagon Investors II, whose directors were top managers of the well-

known **Ziff Brothers** corporation, that has repeatedly been the subject of attention of US law enforcement agencies, due to suspicions of corrupt transactions in the securities market (http://www.fcpablog.com/blog/2016/5/4/och-ziff-reserves-200-million-for-fcpa-settlement-says-bigge.html and https://panamapapers.icij.org/20160505-obama-admin-announces-reform-

 $bid.html?utm_source=feedburner\&utm_medium=email\&utm_campaign=Feed\%3A\%20GlobalMuckraker\%20\%28The\%20Global\%20Muckraker\%29)$

In 2004-2005, after opening of criminal cases against Dalnaya Step and Saturn Investments, and cancellation of preferential taxation in Kalmykia, Browder's group removes all companies from Kalmykia to Moscow, and transfers assets to the Russian capital.

Finally, in 2012 the Kalmyk case, in accordance with the procedure of investigation by default, after all the necessary procedures of locating Browder, was transferred to the Tverskoy District Court of Moscow for consideration on the merits.

That's when Browder delivered his speech at the United States House Committee on Foreign Affairs.

In July 2013 the Tverskoy District Court of Moscow found Browder guilty of committing a tax fraud, and sentenced him to 9 years in prison (Browder verdict dated July 11, 2013). The case against Sergei Magnitsky isolated from the case against Browder on the same episodes, after reviewing grounds for posthumous rehabilitation, was abandoned by the court owing to the death of the defendant, as required by the RF Code of Criminal Procedure (ruling on termination of the case against Magnitsky dated July 11, 2013).

Contrary to popular belief imposed by the same methods of the non-fact-based manipulation, Sergei Magnitsky was not posthumously convicted. On the contrary, taking into account the numerous statements and appeals by lawyers of Magnitsky's mother related to the unlawfulness of his arrest and to him being charged twice (in 2008 and in 2009), also taking into account clarification of the right of the late defendants to rehabilitation in court, according to the same procedure, which is applied to the convicted persons who died, the Court examined the criminal case against Magnitsky in full, and the case was dismissed in court. There have been cases of posthumous rehabilitation, even of convictions and consequent vacation of judgments against the late suspects accused in the Russian Federation both prior to the case for rehabilitation of Magnitsky, and after it. Any person who claims by Browder's behest that there has been "the first-in-history posthumous verdict of the dead defendant in Russia" demonstrates complete ignorance of the issue. Open legal sources can offer over 140 cases in which sentences were pronounced in respect of the late defendants. Such cases were in fact the ground for the Constitutional Court of Russia to express its legal position in 2011 that in case of death of the defendant the case cannot be considered on the merits, but only the grounds for his rehabilitation can be reviewed, and depending on the assessment of the evidence collected by the courts, the person shall either be rehabilitated, or the case against such person shall be terminated, without admission of guilt and bringing in the posthumous verdict of guilty (as it had been before 2011).

At the same time, Browder says nothing about the fact that if he took steps to pay US\$19 million of taxes underpaid for 2001, Sergei Magnitsky, as a person who for the first time had committed a tax

crime, which was later compensated for by full payment of unpaid taxes, would have the right to walk free. And his fate, considering the fact that he could have been placed to a medical institution different from a prison hospital whose abilities were limited, would have been different. But this, too, has never been mentioned by Browder.

Just as he never speaks of the fact that all the assets of the former Kalmyk companies transferred to Moscow and siphoned from the Russian Federation in January 2006 at his request, were subsequently sold at prices dozens of times higher than the investments he made in them, and that he never duly paid the full amount of taxes on over USD \$1 billion of income, and the supervisory bodies of the US Tax Service were not even informed of the income received by the companies registered in the US.

On May 28, 2007, the Chief Investigation Department of the Central Internal Affairs Directorate in Moscow criminal case No. 151231 was initiated against Director General of Kameya LLC, I.S. Cherkasov (who replaced Browder in this position), for an offense under Part 2, Art. 199-1 of the RF Criminal Code into the fact of non-payment of taxes in the amount exceeding RUB 600 million in payment of dividends to Zhoda Limited. Analysis of corporate documents of the companies involved in this case showed that the owners of Kameya LLC, Baikal-M LLC, Imperia LLC, Lori LLC, Sterling Investments LLC, managed through Cypriot companies PENINSULAR HEIGHTS Limited, ZHODA Limited and GIGGS ENTERPRISES Limited, were two American companies – SPEEDWAGON INVESTORS I LLC (Speedwagon 1) and SPEEDWAGON INVESTORS II LLC (Speedwagon 2), located at 153 East 53rd Street New York NY 10022, USA, where Ziff Brothers Investments is located. Director of Speedwagon 1 and 2 was David Gray, a US citizen, and Ian McKinnon was a representative of the shareholders. Both for over 20 years have been employees of Ziff Brothers Investments.

The research into the history of buying up of shares in favor of the final parking company Kameya, revealed that after the death of the strategic owner and the principal investor of the Hermitage Fund – Edmond Safra, since 1999, the largest customer of Browder has become Ziff Brothers Investments, on behalf of which the aggressive buying of Gazprom shares begins, according to the scheme that was simultaneously applied by Browder to the Hermitage Fund (through the creation of mirror Russian legal entities in Kalmykia with a scheme of paying 5% income tax on profits from billion-dollars turnover).

It can be concluded from materials available in the public domain, with account for the documents I received from the Prosecutor General's Office of the Russian Federation under the inquiry I made in 2014, as well as pursuant to the decision of the Tverskoy District Court of Moscow of June 22, 2015, and with account for the materials received during the discovery procedure in the case of PREVEZON from the US Attorney's Office that during the period of November 25, 1999 and December 16, 2004, - 133,574,722 shares of Gazprom were illegally purchased by W.F. Browder in favor of Kameya LLC in the interests of the specified persons, for the amount approximately equal to RUB 2,127,456,004.33, which at the average weighted exchange rate of dollar amounted approximately to \$ 74,621,396.

During the period of 1999 – 2006, an illegal turnover of Gazprom shares in the domestic Russian market in the amount of at least 133.5 million shares was carried out by companies acting under the guise of Russian legal entities, which were in fact fronting for American businessmen – the Ziff brothers. The investments amounted to approximately \$ 74 million, but were attracted in the form of borrowed funds, bypassing both Russian legislation and the US Investment Law. Net income from such activities amounted to about USD \$1 billion, including 66 million Gazprom shares.

However, given these circumstances, as well as the serious gaps in the Browder's version of the theft of RUB 5.4 billion from the Russian budget, in my opinion, the fact of the initiation of this particular criminal case, that reaches to certain American financiers, and the active investigative actions within the framework of the case became the reasons for the Browder's stepped-up action and the subsequent extremely negative consequences for the Russian Federation in the form of accusations of the entire state and judicial system and the country's political leadership of corruption, and after the death of one of the persons involved in the case — S.L. Magnitsky — for the passing of the sanctions act against Russia. The death of Browder's only partner arrested in Moscow, at the stage of familiarization with the case materials, i.e. after the investigation was over, further complicated the work on the Browder's group, because all the attention of law enforcement agencies was switched to the inspections and checks of dozens of complaints which came down like a ton of bricks from the representatives of Browder and his supporters, who until then did not care about the course of the investigation or the fate of Sergei Magnitsky at all.

In another fraudulent tax evasion scam Browder used the notorious MOSSACK FONSECA known for Panama Papers to establish sham companies all over the world. Those sham companies were used to purchase real property in the US, and to participate in Hermitage Fund – Browder's hedge fund. (Browder-related Panama Papers Documents).

3. Working on the US proceedings every time we faced the fact that Browder had occupied all the media; he appeared like a rock star in all the US leading TV channels, giving interviews, comments, every time inserting a mantra of a phrase about the investigative lawyer murdered for exposure of the US\$ 230 million fraud.

Browder got so possessed with it he gradually evolved from a little-known marketeer into a famous politician. And then, as it usually happens in any advertising campaigns of any serious manufacturer – we see his frequent appearances in the news, we see him giving press conferences, speaking as a standup entertainer in various cities at various symposia, congresses, seminars, releasing a book translated into over 20 languages, named, in all modesty, "How I became Putin's enemy No.1," which itself grabs attention.

4. Thus, any attempt of critical assessment of information sold by Browder eventually came to be perceived as a betrayal, desecration of the dead, and those who "dare" to ask awkward questions or give a different point of view would immediately be accused of corruption and working for the Kremlin.

When any journalists, lawyers, politicians tried to sort out – huge gaping holes always came up in this story about a murdered investigative lawyer. But they were immediately declared "Putin's

propaganda," they were demonized, declared cynics and sellouts who dared (just dared) to think and say out loud or just give an opportunity for others to say that Magnitsky "had never even been a lawyer, that he had never investigated anything and made no public statements either in the media or in the documents before his arrest, that his arrest had never been linked to the theft of US\$230 million, that his death was in no way connected with any of his testimony, or "torture" or "beating" which has so far never been confirmed or reliably documented (semantic meaning of what Andrei Nekrasov, NBC journalists, an independent journalist Seymour Hersh, a former journalist Glenn Simpson, and finally, your colleague – a Republican, a former journalist – Dana Rohrabacher). This is the cornerstone of Browder's legend. If Magnitsky had not died, Browder would probably have been convicted not only in Russia, but also in the United States.

Browder's methods always stay the same: he ruthlessly and shamelessly cracks down on everyone who dares to publicly confront him.

The most impudent ban unsupported by any legal regulations was the story of Andrei Nekrasov's film "Magnitsky Act. Behind the scenes."

This film for the first time ever publicly showed a different version of events in Russia first shown according to Browder (with his direct participation), and then with the participation of many persons whom Browder himself claims guilty of both Magnitsky's death and embezzlement of taxes.

The first private screening of the film was arranged and held on June 13, 2016 in Newseum, Washington, DC, moderated by the famous American investigative journalist Seymour Hersh.

Since the very first screening (June 13, 2016) this film became one of the most discussed items among the US – Russia relations. It also revealed a trend of the fierce criticism in Russia and among Russian liberals, based on the presumption of Russia's guilt of Magnitsky's death and total corruption, rather than on facts.

It is these people who act as "firewood" of anti-Russian sentiments furnace, used by Browder in the Congress and in a number of other legislative and governmental bodies in Europe.

Surprisingly, it is in the United States, we found the most severe reaction to ban screening of the film and thoughtful reviews thereof^{2I}.

Before that screening of this documentary was blocked in Europe (Brussels, Germany, Norway, Finland) in connection with threats of legal action by Browder and Magnitsky's widow.

Similar threats were also sent to Newseum in Washington, DC, and to Mr. Hersh, personally. But the film was screened, and the next day Nekrasov and I, a Russian lawyer Natalia Veselnitskaya, representing a Russian businessman in New York lawsuit initiated by Browder, applied to testify in the US Congress.

^{25. 21} https://www.thenation.com/article/by-screening-the-magnitsky-act-the-newseum-stood-up-for-the-first-amendment/

^{26.} https://consortiumnews.com/2016/06/21/wposts-agit-prop-for-the-new-cold-war/

^{27.} http://www.unz.com/article/the-magnitsky-hoax/

And though we've never met with Nekrasov before he made his film, I wasn't struck that much with what he revealed in his film (in fact everyone can make it looking closely into the documents available in Browder's website), but with the fact he was not scared. It was, and it still remains a courageous act.

But Browder goes beyond silencing the opponents. While working on this testimony I became aware that a few weeks ago he solicited and forced 17 Members of the European Parliament to sign a letter to the President of Cyprus about ... banning (!) cooperation between Cyprus and Russia under the treaty on mutual legal assistance in criminal cases²². It turned out that acting through the same Mr. Winer Browder filed a lawsuit in the Cyprus Court against the Cyprus Department of Justice with the same requirement, which is still pending, according to the public sources. Having failed in our case in the United States to achieve judicial legalization of his fictional story, now, acting through the same US lobbyist, Mr. Winer, who, according to Browder's book came up with a "brilliant idea" to impose sanctions against Russia in the United States, he demands the Cyprus Court to ban the Cyprus authorities from fulfilling Russia's requests of legal assistance, referring to a US law, to PACE Resolution, which, as we all understand, were written exactly as told by Browder and his associates who have been evading the justice for many years, just like their patron. What else can be called interference in justice and in the course of investigation? And why 17 European MPs fail to realize that in fact they are covering a crime misusing their official status. But it never bothered Browder because this Pandora's Box of flouting the law, all legal principles, assessment of evidence, investigation and the presumption of innocence was opened for him in the United States, when his legend was named a US law.

Just the other day I learned that another investigator from the Principality of Monaco of Croatian origin, Alex Krainer, who knows Browder personally, was intrigued by his story and wrote a book "THE KILLING OF WILLIAM BROWDER"²³, based on the analysis of Browder's book under a provocative title "How I became Putin's enemy No. 1." Alex Krainer's book published last August was almost immediately withdrawn from Amazon by demand of Browder's lawyer, the same Jonathan Winer, who claimed it was slanderous²⁴.

And the fact that Browder's book offers not a single word of truth about Magnitsky and about the events leading to his arrest – it is of no interest to any official who blindly believed Browder's stunning thriller story about a friend (whom he had never been interested in, and whom he met 1-2 times since 1996, according to what Sergei Magnitsky could remember in his testimony). A new kind of information appeared – "Browder says."

^{28. &}lt;sup>22</sup> 2017.10.29 17 MEPs slam Cyprus over aiding Putin against Browder, laundering - Cyprus Mail.pdf

^{29. 23} https://blog.fdik.org/2017-09/TheKillingOfWilliamBrowder PrintLayout 6x9-1.pdf

^{30. &}lt;sup>24</sup> Amazoncom burns my book – and you need to know about this The Naked Hedgie https://thenakedhedgie.com/2017/09/22/amazon-com-burns-my-book-and-you-need-to-know-about-this/#more-2066

^{31.} Amazoncom Customer reviews The Killing of William Browder Deconstructing Bill B

5. Coming back to the events of May-June 2016.

After witnessing in April 2016 the pulling of Nekrasov's film in Brussels, reading in the media press how liberals dragged Nekrasov through the mud and several weeks later analyzing what happened in the hearing in the House Foreign Affairs Committee on May 18, 2016²⁵, and then his colleagues used the same words only because he dared (!) to call Browder a comman, and his story very questionable for America to call its laws after an individual whose story can be a fraud, I thought we will probably never be the same. This sickening feeling of injustice and humiliation over the law caused me a desire to come to Congress and testify in person. Anyone who wants to get down objectively to the bottom of this story simply can't but share the dismay at how in the global center of the freedom of speech – the United States – this freedom has morphed into the most heinous form of abuse that led to the real cold war imposed on all of us.

Therefore I sought support from anybody in the United States, who would have stood up for the first amendment of the US Constitution. That very support I sought from Donald Trump, Jr., too.

d) Did you receive any instructions about how to conduct the meeting? From whom? What were those instructions?

No.

12. Did you have advance knowledge of who would be attending the meeting?

No, except for those people who had come with me and the person I was going to (Trump, Jr.), I did not have the slightest idea that someone else would be present at the meeting.

13. Was Denis Katsyv involved in arranging your participation in the meeting? If so, in what way?

He didn't take part in arranging my participation, yet, he was aware of it.

14. Was Pyotr Katsyv involved in arranging your participation in the meeting? If so, in what way?

No, he was not.

15. Did you attend the meeting on behalf of the Katsyvs?

I didn't introduce myself in this capacity, however in fact I attended the meeting as a lawyer of Denis Katsyv.

16. What is your relationship with the Katsyvs?

Both in 2016 and today I am the lawyer of Denis Katsyv. I acted as a legal counsel for Pyotr Katsyv in the period of 2012-2014 in some court cases that are not related to this investigation.

^{32. &}lt;sup>25</sup>2016.05.18 Putin's Dirty Game in the U.S https://www.thedailybeast.com/putins-dirty-game-in-the-us-congress

17. Was Emin Agalarov involved in arranging your participation in the meeting? If so, in what way?

All I know is that Aras Agalarov asked his son Emin Agalarov to enquire if Donald Trump, Jr. could help with my request. I am not aware of any further actions of Emin.

18. Was Aras Agalarov involved in arranging your participation in the meeting? If so, in what way?

All I know is that Aras Agalarov asked his son Emin Agalarov to enquire if Donald Trump, Jr. could help with my request.

19. Did you attend the meeting on behalf of the Agalarovs?

No.

20. What is your relationship with the Agalarovs?

I am not personally acquainted with Emin Agalarov, there are no relations. I am the lawyer of Aras Agalarov on the issues that have nothing to do with this investigation.

21. Was Yuri Chaika involved in arranging your participation in the meeting? If so, in what way?

No, he was not.

22. What is your relationship with Chaika, his office, and/or his representatives?

I have no relationship with Mr. Chaika, his representatives, and institutions, other than those related to my professional functions of a lawyer.

As a lawyer of Denis Katsyv, since 2013 I have sent several appeals to the Russian Federation General Prosecutor's Office requesting documents within my legal powers, and also filed applications to verify the information about Mr. Browder's activities in Russia that resulted in the wrongful seizure of my client's assets in the USA and Switzerland, received answers, analyzed them and addressed them anew, should I be refused answers or provision of documents – I appealed to the court.

I was also invited several times to explain the contents of my applications for documents that I collected in the framework of my legal procedure. Similar work was done by me as a lawyer in the Investigative Department of the RF Ministry of Internal Affairs.

Several times I was formally received by the Prosecutor General of Russia. I have interacted with the RF Prosecutor General several times in the capacity of a lawyer. For example, this summer, I was granted an audience with the RF Prosecutor General, Yu. Ya. Chaika, to deliver an official statement in connection with my defending an American citizen and a member of the US Jewish community who had been arrested in Moscow in the spring of this year for importing forbidden items. The young man was facing up to four years in prison. I accepted him as a client on his family's request when I was still in New York. And despite the fact that the US Embassy refused to participate in the fate of the American citizen (I spoke with the US Consul in Moscow several times asking the embassy to submit a petition to the RF Prosecutor General's Office which the embassy never bothered to do), thanks to the well-coordinated cooperation with US lawyers and experts, members of the Moscow and

US Jewish communities, once Mr. Chaika had heard out the arguments of the defense and instructed that they be verified, the case was closed; my client was ordered to pay a small court penalty and allowed to return home to his family. I have no right to identify the client but the case is well known to the US Embassy in Moscow.

23. Who knew about the meeting? Who knew in advance that you would be attending?

If you mean before the meeting, I myself, my client – Denis Katsyv, Irakli Kaveladze, my translator Anatoly Samochernov, and Rinat Akhmetshin, who arrived that day in New York for an evening performance of Russian theatre stars. The meeting and my presence there, prior to the meeting per se, was known to Rob Goldstone, who had sent me an e-mail message regarding it, which I also received, when already in the US on a business trip. Whether Mr. Trump, Jr. knew anything about me and my name is unknown to me.

24. Was any official for the Russian government informed of the meeting?

Not that I know about. If so, who? Why were they briefed? What was their role?

I know nothing with regard to it.

a) How and when did you become aware that this person(s) had been informed of the meeting?

I know nothing with regard to it.

25. To the best of your knowledge, was anyone at Baker and Hostetler aware of the meeting beforehand, contemporaneously, or shortly thereafter?

I do not know anything about it

26. Did you communicate with any Trump campaign officials or any other meeting attendees prior to June 9, 2016? If so, with whom and what was discussed?

I did not communicate with any of Trump campaign officials either before or after the meeting. With those present at the meeting, Samochernov, Kaveladze, and Akhmetshin, I spoke about the meeting on the day it was to be held, possibly, I mentioned it the day I arrived in New York when speaking with Kaveladze by phone, but I do not have exact information about it.

27. Do you know about other emails discussing the meeting besides the one publicly released between Robert Goldstone, Donald Trump, Jr., and Paul Manafort?

Besides the disclosed correspondence designated as Attachment A to the Committee's request, and my correspondence in Exhibit 1.2. I know nothing of any other correspondence.

28. Attached hereto is an email chain publicly released by Donald Trump, Jr., marked as Attachment A. Have you seen any of Attachment A other than by viewing it from a public source after its public release by Donald Trump, Jr.? If so, identify what part(s) of Attachment A you saw, when you saw the part(s), the circumstances under which you came to see the part(s) of the email chain, and whether you obtained a copy of any part(s).

For the first time I saw this correspondence in the evening of July 11, 2017 in Moscow, in the TV studio of NBC channel, where I had come for my first interview on this topic.

Today I can say that the story of my meeting with the son of the US President in the form in which it is currently being cultivated in America is nurtured by the US media, and behind them and politicians there is a cheap, inciting and eerily irresponsible campaign. Aimed against the institution of the President as such, and ultimately – against their people.

The heat of passion reached such a climax (as it seemed to me then) that I interrupted my vacation and on my younger son's birthday came to the studio in the morning to answer the questions from a leading US channel that had asked for an interview two days after the "page-oner" by the NYT, which was staged and rigged and vulgar, but still no less dangerous for your country. My phone, house, office became known to all world agencies, I saw how lies spread out for a believable story and decided to give an interview to the channel, whose journalists a year before these events had been subjected to severe pressure on the part of Browder and threats of suits for their attempt to conduct an independent investigation of Browder's story. After giving the interview that can be seen in full on this link, I was about to be back to my family, but it turned out that a crowd of journalists had gathered downstairs. When I first found myself in such a situation, I did not know what to do, while reading what was happening in the information space after NBC broadcast my words live, I realized that nobody really needed the truth: snatching one of my words and inserting it in the context prepared beforehand, the American media simply destroyed their President using my name. For me, it was and still is a savagery: I do not care about who the US President is, but to destroy a person whom tens of millions of citizens have voted for using conspiratorial accusations just for a world show is a direct road to schism and mutual hatred; this is all beyond the limits of a shocking, emotional news coverage acceptable in journalism on the issues that are burning for the society. And this, with undisguised pleasure and relish, was participated by all the leading US channels. It was under these circumstances, that I read this correspondence and to the correspondent's question "What do you say to this?" I answered: "bullshit".

29. If you obtained any part of Attachment A prior to its public release or from any source other than a public source, did you share any of the email chain with others? If so, for every time you shared any part of Attachment A, identify with whom you shared any part of Attachment A, what part(s) you shared, when you shared that part, and the circumstances under which you shared that part of Attachment A.

No.

- 30. In attachment A, in a message sent by Rob Goldstone to Donald Trump Jr. on July 7 at 4:20 p.m., there is a reference to "The Russian government attorney who is flying over from Moscow for this Thursday [June 9].
 - a) Is that a reference to you?

I was not familiar with Goldstone before the moment, I saw him on June 9, all the communication that I had had with the said person was the correspondence that I have produced (see Exhibit 1.2.), which reveals no factual data, according to which Mr. Goldstone would characterize me in such a way. I would be honored to be an attorney of the Russian Government, but I do not work for the Government of Russia.

b) Have you ever been paid by any part of the Russian government, directly or indirectly, for work as an attorney, whether as an employee or otherwise? If so, describe the nature of your work, the timeframe, the nature of your professional relationship with the Russian government, and the part of the Russian government for which you worked.

Besides my work in the Prosecutor's Office till the spring of 2001, I have not received any fees for work from the government of the Russian Federation.

- 31. Do you know any of the following individuals? If yes, for each person please explain how you know them and the nature of your relationship (personal, business, both):
 - a) Vladimir Putin No.
 - b) Boris Gromov
 - c) I know him in a professional capacity as I represented the interests of the Moscow Region the subject of the Russian Federation that he headed (similar to a state) in various court cases.
 - d) Rinat Akhmetov No.
 - e) Oleg Deripaska No.
 - f) Viktor Yanukovych No.
 - g) Igor Diveykin No.
 - h) Igor Sechin No.
 - i) Carter Page No.
 - j) Sergei Gorkov No.
 - k) Mikhail Kalugin No.
 - l) Konstantin Kilimnik No.
 - m) Sergei Kislyak No.
- 32. Did you discuss the June 9 meeting with any of the individuals listed in the preceding question? If so, please describe when, what was discussed, and who else was present.

No.

- 33. In attachment A, at the bottom of that email chain, Rob Goldstone sends a message to Donald Trump Jr. on June 3, 2016 at 10:36 a.m.
 - a) In that message, Goldstone writes that Emin [Agalarov] just called him and said [Emin's] father [Aras] met with "the Crown Prosecutor of Russia"? What is your understanding of who the "Crown Prosecutor of Russia" is or might be?

I do not know what Mr. Goldstone was talking about. Given what I know, I can assume that Mr. Agalarov might tell him a little about me, mentioning that I had previously worked in the prosecutor's office, and the information I wanted to tell in the US Congress had also been reported by me before to the General Prosecutor's Office of Russia and it was confirmed there. Having compiled this, the musical producer (as I learnt more than a year later) could either confuse everything, or intentionally make everything look intriguing so that the meeting could take place.

b) Did you ever speak with Yuri Chaika about Donald Trump? Did you ever speak to him about Hillary Clinton? Did you ever speak to him about the 2016 elections in the United States? If the answer to any of these questions is "yes," please also identify when the discussions took place, who was present, what was said and whether the

discussion took place in-person, by phone, or by other electronic communication (email).

No.

- c) In that email, Goldstone also writes that there are "official documents and information that would incriminate Hillary and her dealings with Russia"? Do you know what that means? If so, what are the documents and information? How are they "official" what is the connection to the Russian government?
- d) The email also says that this is "part of Russia and its government's support for Mr. Trump"? What do you understand that to mean? Did the Russian government support Mr. Trump? How did they express that support? Did they offer assistances if so, what kinds of assistance? Who was this offered to and when? What was the response?

Here, let me respond to both of the subparagraphs at a time, since they are taken from one letter and are, as is seen, a single message, because of which, as Mr. Trump, Jr. himself said, he was misled and expressed a desire to meet with me.

Firstly, I do not know anything about this; at least I have never given such information. I do not know what information and documents Mr. Goldstone had in mind.

Secondly, if you follow the logic of submitting information to the United States as to the fact that the RF Prosecutor General was supposed to be meant by the "the Crown Prosecutor of Russia", then on the basis of Goldstone's next phrase about the transfer of "official documents and information that would incriminate Hillary and her dealings with Russia", which ends with the "this is "part of Russia and its government's support for Mr. Trump", doesn't the absurdity and improbability of the story by this Frankenstein writer become obvious? Can someone really think that the Prosecutor General is "leaking" "official, serious and confidential" information, uncovering some of his country's bad relations with one candidate to another candidate via business people? Isn't the nonsense discussed for 4 months already very obvious?

Discussion at the June 9 Meeting

34. Was the intended purpose or outcome of the meeting achieved?

No, it was not.

- 35. Please explain all of the topics that were discussed at the June 9 meeting, including but not limited to the following:
 - a) Did you or anyone at the meeting mention William Browder? If so, what was the discussion?

Yes, I did mention him as the person who essentially is the architect of the cold war between Russia and the USA, who has been avoiding criminal liability in Russia for 12 years, a convicted criminal in Russia who had his own motives and possibilities, under the guise of defending the rights of a person he barely knew, Sergey Magnitsky, to obtain in the USA, the country he renounced almost

20 years ago, an unprecedented protection and immunity from investigation and legal accountability in the form of the Magnitsky Act.

b) Did you or anyone at the meeting mention the Magnitsky Act? If so, what was the discussion?

Yes, I did mention it within the context of what is said in Paragraph "a". I also said that no one had ever conducted an investigation into the circumstances in question prior to adopting said act. There had never been any conclusions made by independent professional experts, nor had there been any open debates involving people who could have taken professional part in such a discussion as opposed to the monologues recorded by Browder's employees and disseminated among the congressional representatives in advance. I cannot even imagine the faces and thoughts of the respected Congressmen if they heard and saw the documents proving that everything that has been said on Capitol Hill on Browder's initiative over the past six years is a monstrous lie that has led to the adoption of such an act that has resulted in a cold war, discord, hatred, disruption of economic and social relations, including the adoptions ban.

c) Did you or anyone at the meeting mention Russia's ban on U.S. adoption of Russian children? If so, what was the discussion?

Yes, I did it within the context related in the previous paragraph.

d) Did you or anyone at the meeting ask that then-candidate Trump take any action regarding the Magnitsky Act or the Global Magnitsky Act if elected? If so, what was the reply?

No, no one did. Further details are given in the answer to question No. 41.

e) Did you or anyone else at the meeting suggest that the Russian government might take any actions or provide any benefits in connection with any request made of then-candidate Trump? Did you or anyone else at the meeting represent that Russian policy may change in connection with any proposed action?

No.

f) Did you or anyone at the meeting mention the Justice Department's lawsuit against Prevezon Holdings?

I do not remember this, but the context in which I might mention it was just to clarify in connection with which circumstances I had begun to conduct the investigation on activities of Browder's group in Russia and the circumstances of their immoral and unlawful interference in the justice and legislation.

g) If so, did you or anyone in the meetings ask that then-candidate Trump take any action regarding the Prevezon Holdings case if elected? If so, what was the reply?

No, we didn't. We did not need any support in the case, since we were sure we would win it. The case had been suspended on Browder's request since January 2016, he sought to disqualify our lawyers after the government had failed to convince the judge of the indisputability of the facts of the story, rewritten in the lawsuit from Browder and his staff (docket from case file No. 418-423, transcript of the hearing

in the court of November 30, 2015 (document No. 470)). Browder himself three times evaded his deposition, and on the eve of the trial scheduled for January 2016, once again broke his deposition that we applied for to bring him to justice for contempt of court (Prevezon Case, Dkt. 478-490, transcript of the court hearing of December 7, 2015 (Dkt. 487)). We had spent three years trying to get the proceedings started and we were confident we would win. But Browder, realizing the strong foundation of our arguments, reinforced with support in the desire not to lose from the district attorney's office that had spent several million dollars on the case, did manage to thwart the launch of the proceedings by filing a complaint against the decision of the court of first instance to refuse to disqualify the case lawyers.

h) Did you or anyone at the meeting mention Hillary Clinton? If so, please describe that portion of the conversation.

I do not remember if I mentioned her name. I remember mentioning the Democratic Party and president Obama. I will explain. The most insignificant portion of my speech had to do with my assumption that the money that entered the USA in 2007 might have been concealed from the US government bodies, which might have created fertile ground for their illegal use. For example, that money could have been used to lobby the legislative process and advocate one's interests within the US government bodies. Considering that Browder, via some representatives of the Democratic Party, began his lobbying campaign in the USA back in 2008 (not in 2010 as he willfully claims in his book), I did not rule out the possibility that the money obtained, unbeknownst to the government, by the companies owned by Ziff brothers could have been used exactly for that.

i) Was any information specific to Hillary Clinton provided in the meeting? If yes, by whom and what information was provided?

No, it was not.

j) Did anyone in the meeting ask for information specific to Hillary Clinton? If so, please explain.

As far as I can remember, when I was saying that the adoption of the Magnitsky Act, which might have been sponsored by Ziff brothers, as well known and active donors of the Democratic Party (see explanations in Paragraph "h"), coincided in time with the presidential campaign, Donald Trump, Jr. asked if I had any financial documents proving that what may have been illegally obtained funds were also being donated to Mrs. Clinton's foundation. I said that I did not and that it was not my issue. The meeting, essentially, ended there. Today, I understand why it took place to begin with and why it ended so quickly with a feeling of mutual disappointment and time wasted. The answer lies in the roguish letters of Mr. Goldstone. Even the one time he received from me my own explanations regarding the essence of the meeting, when I also asked permission to bring Rinat Akhmetshin "who is working on promoting these issues with several congressmen and has invaluable knowledge of the positions of the members of the House Foreign Affairs Committee that will be important for our discussion", if he (Goldstone) had been misled by someone indeed, upon receiving my inquiry and comparing it with what he had written to Trump, Jr. several days before, he could have asked me a simple question: what do Congress and the House Foreign Affairs Committee, which knows something already, have to do with any of this? Or he could have warned Trump, Jr. somehow. But

no, Mr. Goldstone immediately informs me, apparently without even conferring with anyone, including Trump, Jr., making an independent decision concerning Rinat's participation in the meeting²⁶. Now that I know the kind of apocalyptic Hollywood scenario what a private conversation between a lawyer and a businessman can be turned into, I very much regret that the desire to bring the truth to the congressmen has thrown the US President's family, as well as Mrs. Clinton, into the whirlwind of mutual political accusations and fueled the fire of the morbid, completely groundless hatred for Russia.

k) If Hillary Clinton was not discussed, were you prepared to discuss that topic? If so, please explain what you were prepared to say on that topic, and why you were prepared to talk about it.

I am not prepared to discuss what I do not know. All I know about Ms. Clinton's involvement in the story of lobbying of the Magnitsky Act is limited to the petition submitted to her as the US State Secretary by Senator Cardin on April 26, 2010²⁷, following which the most aggressive episode of the lobbying effort started and the Maryland Senator himself became "the most influential politician in the USA" ²⁸

l) Did anyone discuss "hacked" emails belonging to the Democratic National Committee, Hillary Clinton, John Podesta or the Clinton campaign? If so, please explain.

No, no one did. I was not even aware of this then, since I was at that time not very interested in politics and what was happening with the pre-election campaigns in the United States. I didn't care who would win.

m) Did anyone at the meeting suggest they had access to the hacked Democratic National Committee emails?

No, no one did.

n) If hacked emails were not discussed, were you prepared to discuss that topic? If so, please explain what you were prepared to say on that topic, and why you were prepared to talk about it.

No, I am not prepared to discuss what I do not know. If that correspondence had concerned me or one or more of my clients, I would have analyzed it, most likely. However, while all this information was being actively discussed in the media, nothing about it made me interested in analyzing somebody else's letters.

o) Was Facebook discussed at the meeting? If so, please explain.

No.

^{33. 26 2016 06 07-09} full rob@oui2

^{34. 27 2010.04.26} Letter Cardin to Clinton

^{35. &}lt;sup>28</sup> Chapter 32 From Browder's book "Russell 241"

p) Did Mr. Goldstone or anyone else discuss a proposal regarding Vkontakte (VK) during the June 9, 2016 meeting?

No.

q) Did anyone at the meeting discuss creating or distributing news stories about Donald J. Trump?

No.

r) Did anyone at the meeting discuss creating or distributing news stories about Hillary Clinton?

No, no one did.

s) Did anyone at the meeting discuss attempts to influence voters in the 2016 election campaign?

No. no one did.

- t) Did anyone at the meeting discuss efforts to infiltrate voter registration systems? No, no one did.
- u) What, if anything, did you or anyone at the meeting offer Donald Trump, Jr., Paul Manafort, Jared Kushner, or the Trump campaign during the meeting?

Nothing.

what, if anything, did you or anyone at the meeting ask of Donald Trump, Jr., Paul Manafort, Jared Kushner, or the Trump campaign during the meeting?

I asked Donald Trump, Jr. to help with support for the upcoming June 14, 2016 Congress hearing in the House Subcommittee on Europe, Eurasia and Emerging Threats, where Andrei Nekrasov had been officially invited. He is the creator of the sensational film, so painfully apprehended by Browder and his allies, including in the Congress. And it was also supposed that I might be called as a witness of my own investigations into Magnitsky and Browder activities.

36. Did you offer or provide any documents to the Trump campaign?

No. I did not meet with the "Trump campaign". At the meeting with Donald Trump, Jr. I had a reference in my own handwriting (see Exhibit 1.1), which I was ready to leave to Mr. Trump, Jr., should he need it. But to offer or provide this information was pointless, because as I understood during the meeting, Mr. Trump, Jr. was not at all aware of my request and could not help me at all.

a) If so, what were they? Please describe any materials that were offered or distributed at the meeting, and produce copies of any such materials in your possession.

There were none. See above.

- 37. Did you take any notes at the meeting? If so, please produce copies of any such notes. No.
- 38. Did anyone else take notes at the meeting?

I do not know anything about it.

39. Did any attendees bring notes to the meeting?

I do not know anything about it.

40. To the best of your knowledge, what time did the meeting begin and when did it end?

I do not remember at what time the meeting took place. I would not have remembered its date either, if Donald Trump, Jr. had not said about it to the journalists a year later on July 8, 2017. It lasted about 20-30 minutes, which per se, taking into account the consecutive translation of the speech, took even less time content-wise.

41. How did the meeting conclude?

Mr. Trump, Jr. politely wound up the meeting with meaningless phrases about somewhat as follows: can do nothing about it, "if" or "when" we come to power, we may return to this strange and confusing story. I personally regarded this as an elegant, but final farewell. That's all about it.

Roughly the same thing was remembered by Trump, Jr. in his very first interview in the New York Times on July 9, 2017²⁹. I also told all journalists about this, and those with whom I had to speak under this stunning information attack against me and the participants in this meeting. I began to react less and less to media requests, seeing the rabid censorship as to my interviews, comments, and in some cases, complete distortion, appending, sleight-of-hand (as in the case of the NYT, CNN, etc.) or even refusing to display the footage for the reason of "potential legal claims on the part of Browder" (as in the case of the BBC).

Anyway, at the request of my client, I met with two journalists from the Bloomberg Moscow office, who first assured my client (Denis Katsyv, who was sitting next to me), and then me that they were very interested in the story of Magnitsky, how the money had been withdrawn, what the relationship was between the adoption of the Act in the United States and the activities of American billionaires Ziff brothers, and other issues that were part of my work on the Prevezon Case. Then they sent my quotes to me for approval, and several times I was asked by phone "not to get anything mixed". As a result, the Moscow office of Bloomberg surpassed even the most out-and-out "seekers of Trump's collusion with Russia" and the journalists who had for many years worked for Browder, who had repeated their lies so many times that they themselves began to believe them, but even they hadn't gone as far as to distort the direct speech of the interviewee by adding their own context.

The above recollections of the end of the meeting last week were turned upside down by the American media. The two artificially constructed phrases in the Bloomberg $^{3\theta}$ proposed context were used by the mainstream media on November 6-8, 2017 to create a new sensation, attributing to me the words I had never uttered and which had never been voiced by anybody during the meeting: the repeal of the Magnitsky Act in exchange for compromising evidence on Hillary 31 . And although they did

^{36. &}lt;sup>29</sup> 2017.07.09 New York Times: https://www.nytimes.com/2017/07/09/us/donald-trump-jrs-two-different-explanations-for-russian-meeting.html

^{37. 30 2017.11.06} Bloomberg: Trump Jr. Hinted at Review of Anti-Russia Law, Moscow Lawyer Says https://www.bloomberg.com/news/articles/2017-11-06/trump-jr-said-anti-russia-law-may-be-reviewed-moscow-lawyer-says

^{38. 31 2017.11.06} Fortune: Russian Lawyer Says Trump Jr. Offered Her a Deal: Hillary Dirt for a Change to U.S. Law http://fortune.com/2017/11/06/trump-jr-russia-lawyer-deal-clinton/;

not say so explicitly in their article, they provided a context from which immediately after a couple of hours all the American media broadcast what Trump's opponents had so much wanted to hear. I have never expected such treachery on the part of quite respectable Bloomberg. But this is the way most media currently work.

Summary of Meeting Attendees

42. Please provide a list of all attendees at the June 9 meeting, including any attendees who only stopped by the meeting briefly or did not stay for the entirety of the meeting.

I came to the meeting with Anatoly Samochornov, a translator, Irakly Kaveladze, a lawyer of my client who helped to arrange for the meeting, Rinat Akhmetshin, my colleague who was working with me on the Prevezon case.

We were met by a big, stout man who introduced himself as Rob and escorted us on the elevator to the boardroom.

I saw two men in the boardroom – one of them introduced himself as Donald Trump Jr., while the other did not introduce himself. Another young man entered the boardroom a little later and left it shortly afterwards. I found out much later that the two unidentified gentlemen were P. Manafort and J. Kushner.

^{39. 2017.11.06} Huffington Post: Russian Lawyer Who Met With Donald Trump Jr. Claims He Offered A Quid Pro Quo https://www.huffingtonpost.com/entry/donald-trump-jr-russian-lawyer-meeting_us_5a006330e4b04cdbeb34c397;

^{40. 2017.11.06} Alternet: Did Russian Lawyer Natalia Veselnitskaya Just Gift-Wrap Donald Jr. to Robert Mueller? https://www.alternet.org/news-amp-politics/did-russian-lawyer-natalia-veselnitskaya-just-gift-wrap-donald-jr-robert-mueller;

^{41. 2017.11.06} Washington Examiner: Russian lawyer: Donald Trump Jr. said Magnitsky Act could be reconsidered if Trump won http://www.washingtonexaminer.com/russian-lawyer-donald-trump-jr-said-magnitsky-act-could-be-reconsidered-if-trump-won/article/2639744;

^{42. 2017.11.06} Reuters: Russian lawyer says Trump son offered to return to issue of sanctions law: Bloomberg https://www.reuters.com/article/us-usa-trump-russia-magnitsky-law/russian-lawyer-says-trump-son-offered-to-return-to-issue-of-sanctions-law-bloomberg-idUSKBN1D62MY;

^{43. 2017.11.06} Newsweek: DONALD TRUMP JR. TOLD RUSSIAN LAWYER 'IF WE COME TO POWER' AN ANTI-RUSSIA LAW WOULD BE RECONSIDERED http://www.newsweek.com/donald-trump-jr-told-russian-lawyer-if-we-come-power-anti-russia-law-702516;

^{44. 2017.11.06} Raw story: 'If we come to power': Donald Trump Jr. suggested he would overturn anti-Russia law, Russian lawyer says https://www.rawstory.com/2017/11/if-we-come-to-power-donald-trump-jr-suggested-he-would-overturn-anti-russia-law-russian-lawyer-says/#.WgBwFRqFROM.twitter;

^{45. 2017.11.06} MSNBC: Details of infamous Trump Tower meeting come into sharper focus http://www.msnbc.com/rachel-maddow-show/details-infamous-trump-tower-meeting-come-sharper-focus;

^{46. 2017.11.06} CNN: Russian lawyer: Trump Jr. suggested review of sanctions law in Trump Tower meeting http://edition.cnn.com/2017/11/06/politics/natalia-veselnitskaya-donald-trump-jr-russia/index.html;

^{47. 2017.11.06} The DailyCaller: Russian Lawyer Makes New Claim About Trump Tower Meeting http://dailycaller.com/2017/11/06/russian-lawyer-makes-new-claim-about-trump-tower-meeting/;

^{48. 2017.11.06} Independent: Donald Trump Jr hinted at deal with Russian lawyer for Clinton dirt http://www.independent.co.uk/news/world/americas/us-politics/trump-jr-russia-deal-hillary-clinton-lawyer-meeting-a8041126.html;

^{49. 2017.11.06} New York Times: Russian Lawyer Says Trump Son Offered to Return to Issue of Sanctions Law: Bloomberg https://www.nytimes.com/reuters/2017/11/06/world/europe/06reuters-usa-trump-russia-magnitsky-law.html etc..

43. Were all of the meeting attendees introduced? Was anyone introduced as a member or associate of the Russian government?

Only Donald Trump, Jr. introduced himself to me. I had no idea who was with him. I do not remember that he was introduced to me. Lots of time later, I learnt that it had been Paul Manafort, the election campaign manager. After the meeting began, another young man entered the room, he did not introduce himself either. Ten or fifteen minutes later, he left the boardroom. As I went to the meeting with a friend of my client's son, I took the young man for his younger brother (I did not know the composition of the Trumps family). More than half a year later, walking along New York streets, I browsed news in my phone and saw a picture of that young man in some of the publications and learnt for the first time that it had been Mr. Kushner, a son-in-law of the already incumbent U.S. President. Nobody introduced himself as a member or employee of the Russian government. I do not know anyone who was present at that meeting and was in the capacity specified in the question.

44. How were you introduced? Did you indicate that you were a lawyer connected to the Russian government? Did you suggest that you were participating in the meeting on behalf of anyone else, or representing another party's interests?

I introduced myself as a lawyer who carried out an investigation in connection with one of the U.S. cases and found out the information that I believed was my duty to provide to congressmen and I needed help to be heard or to make my colleagues to be heard, namely, Rinat Akhmetshin who had been a registered lobbyist at the Congress at that time.

I said that I represented the interests of my clients and, among other things, acted as a consultant on legal matters for HRAGIF, a fund that set a goal to make it possible, among other things, to resume adoption of Russian orphans by Americans, which had become impossible because of the intense lobbying campaign by Browder resulted in passing the Magnitsky Act which undermined all relations between our countries and who is successfully manipulated by a bunch of fraudsters thereby hiding from justice.

45. Have you ever worked for the Russian government? (Apart from anything covered by Question 30)

I do not quite understand the difference between points 30 and 45. I did not work for the government of Russia or any other country, except for what I have specified in point 30.

a) If so, in what capacity?

Based on my understanding of the "work for the Russian government", I have never worked for it, except for my job at the Prosecutor's Office in 1998 – 2001. If this question contains a broader interpretation suggesting the work with state-owned companies, state bodies, then my clients during my private practices included various state-owned enterprises and organizations as well as state bodies of federal significance, against which I have stood and I am still standing. These matters have nothing to do with any questions that would be investigated by the esteemed committee. And these matters relating to both defending state structures and acting against them are part of my legal profession and have a legal privilege because they are covered by the attorney-client secret by virtue of Article 8 of

the Federal Law "On Legal Practice and Advocacy in the Russian Federation" and Articles of the Code of Professional Ethics of Lawyers in the Russian Federation.

46. What did you understand to be your role in the meeting?

As a lawyer and an uncompromising opponent of misusing the state system for personal selfish goals, that makes, not only my client, but citizens of both states suffer.

47. Did you speak to the meeting attendees directly, or did you rely on a translator? Did Anatoli Samochornov translate for you?

Through translator Anatoly Samochornov.

- 48. Did you speak to any of the meeting attendees at any time before or after the meeting?
- I did not speak to anyone whom I first saw at the meeting at any time before or after the meeting.
 - a) If so, who? Was that in-person, by email, by telephone? What was discussed? Was anyone else present? Did you use a translator during these communications?
- 49. Did you know Irakle Kaveladze before the meeting?

We got acquainted first by phone when I was in Moscow. I met him personally first on June 9 shortly before the meeting.

a) If so, how did you know him?

We had a phone call and met at a café, I do not remember where and at what café. I told him briefly what I knew about the Browder case, about the Ziffs and their possible support when lobbying his interests in the United States.

50. How was Mr. Kave ladze introduced?

If you are talking about the meeting, I do not remember that he introduced himself in any other manner than by his first name.

51. Did Mr. Kaveladze explain for whom he worked or what his business was?

As far as I remember, no he did not

52. What was Mr. Kaveladze's role during the meeting?

I can suppose, he attended the meeting as a translator, however, as I was with a translator he was just sitting and listening.

53. Did you know Rinat Akhmetshin before the meeting?

Yes, I did

a. If so, how did you know him?

At the office of our lawyers in late 2015 in New York. He was a member of the team of hired consultants.

54. How was Mr. Akhmetshin introduced?

At the meeting, as a hired consultant on Russia who also promoted the idea at Congress to investigate into Browder and his act, and he also gathered information on the consequences of Browder's destructive activities that resulted in banning adoption of Russian children by Americans.

55. Did Mr. Akhmetshin explain for whom he worked or what his business was?

If the question is how he was introduced to me when I first met him, then he worked for my client being retained by a law firm we hired for defense in a court case.

If the question is how he was introduced at the meeting on June 9, then as a consultant of the Human Rights Fund for relations with Congress.

56. What was Mr. Akhmetshin's role during the meeting?

As a person who communicated directly at the Congress on investigating the case that caused Russia's banning the adoption of Russian children by Americans.

57. Did you know Anatoli Samochornov before the meeting?

Yes, I did.

a. If so, how did you know him?

In October 2015 when he was invited as a certified court translator for interrogations of my clients.

58. How was Mr. Samochornov introduced?

As a certified translator.

59. Did Mr. Samochornov explain for whom he worked or what his business was?

As far as I remember, no, he did not.

60. Did Mr. Samochornov do anything at the meeting other than translate?

No, he did not.

61. Did you know Rob Goldstone before the meeting?

I got acquainted with him five minutes before the meeting in the hall in the building where the meeting was held.

a. If so, how did you know him?

See answer to Q.61 above.

62. How was Mr. Goldstone introduced?

He was not introduced at all.

63. Did Mr. Goldstone explain for whom he worked or what his business was?

No, he did not.

64. What was Mr. Goldstone's role during the meeting?

I do not know.

65. Did you know Paul Manafort before the meeting?

No, I do not.

a. If so, how did you know him?

I do not know him.

66, Had you at any point met or communicated – either directly or indirectly – with Paul Manafort prior to June 9, 2016? If yes, please explain these interactions, including: when they took place; whether they were in-person, by email, by phone, or through intermediaries; who else was present; what was discussed; and any follow-up communications (if any). If you communicated through intermediaries, please identify them and describe the form and content of their interactions.

No. I had never even heard about his existence and I learnt from the press about his name as a person present at that meeting more than one year after it took place.

67. To the best of your knowledge, had any of your colleagues communicated with Mr. Manafort prior to June 9, 2016? Please explain.

I know nothing of this kind.

68. What did Mr. Manafort do during the meeting?

He was sitting on the left of Trump, Jr., looking into his telephone and at some point it seemed to me that he closed his eyes and fell asleep.

a. Did he ask any questions or make any comments?

I do not remember, maybe he said something at the end, but I do not remember it at all, it was all insignificant. I wanted to go away as soon as possible, and I felt that Trump, Jr. wanted the same too.

b. Did he stay for the entirety of the meeting?

Yes, he did.

- 69. Had you at any point met or communicated with Jared Kushner before the meeting?
 No.
 - a. If so, how did you know him?

I did not know him.

70. Had you at any point met or communicated – either directly or indirectly – with Mr. Kushner prior to June 9, 2016? If yes, please explain the extent of your interactions, including: when they took place; whether they were in-person, by email, by phone, or through intermediaries; who else was present; what was discussed; and any follow-up

communications (if any). If you communicated through intermediaries, please identify them and describe the form and content of their interactions.

No.

71. To the best of your knowledge, had any of your colleagues communicated with Mr. Kushner prior to June 9, 2016? Please explain.

I do not know anything about it.

72. What did Mr. Kushner do during the meeting?

He was just listening.

a) Did he ask any questions or make any comments?

No, he did not.

b) Did he stay for the entirety of the meeting?

No, he did not.

73. Had you at any point communicated with Donald Trump, Jr., prior to June 9, 2016? If yes, please explain the extent of your interactions:

No.

- 74. Did you know Donald Trump, Jr., before the meeting?
 - a) If so, how did you know him?

No. I did not.

75. Had you at any point communicated – either directly or indirectly – with Donald Trump, Jr., prior to June 9, 2016? If yes, please explain the extent of your interactions, including: when they took place; whether they were in-person, by email, by phone, or through intermediaries; who else was present; what was discussed; and any follow-up communications (if any). If you communicated through intermediaries, please identify them and describe the form and content of their interactions.

No.

76. To the best of your knowledge had any of your colleagues communicated with Donald Trump, Jr., prior to June 9, 2016? If yes, Please explain.

No, they had not. (Araz Agalarov is not my colleague)

77. What did Donald Trump, Jr., do during the meeting?

He listened, asked for some clarifications and said goodbye.

a) Did he ask any questions or make any comments?

As I was telling my story, he asked if I had any financial documents from which it would follow that the funds stolen from Russia were then involved in financing the Clinton's Foundation. I said that I didn't and it was not my issue at all.

b) Did he stay for the entirety of the meeting?

Yes.

78. Did you know any member of the Trump campaign or Trump family before the meeting?

No.

a) If so, how did you know them?

I did not know them.

79. Had you communicated – either directly or indirectly – with (now-President) Donald Trump or his assistant, Rhona Graff, prior to June 9, 2016? If yes, please explain the extent of your interactions, including: when they took place; whether they were inperson, by email, by phone, or through intermediaries; who else was present; what was discussed; and any follow-up communications (if any). If you communicated through intermediaries, please identify them and describe the form and content of their interactions.

No.

80. To the best of your knowledge, had any of your colleagues communicated with Donald Trump or his assistant, Rhona Graff, prior to June 9, 2016? If yes, please explain.

I do not know anything about it.

Meeting Follow-up

81. Did you or any other meeting attendees request additional meetings or communications with Donald Trump, Jr., or any member of the Trump campaign, the Trump administration, or the Trump Organization?

No.

82. Since the June 9 meeting, have you had any additional meetings or communications with Donald Trump, Jr., or any member of the Trump campaign, the Trump administration, or the Trump Organization?

No, I have not.

Prevezon Work & June 8-10 Events

83. Please describe and provide supporting documentation of your schedule during your trip to the United States surrounding the June 9 meeting.

Given that the method I used to cross the border in June 2016, as well as my visa were the subject of the inquiry submitted by the Justice Committee to the US Department of Justice³², as well as the focus of numerous insinuations and speculations in US media, I have to cover this issue in greater detail.

This was my first trip to the USA under my very first US visa. Prior to that, since October 2015, I had traveled to the USA on business about four times (excluding my trips from the USA to London and back to the USA within the confines of the same business trip) with the view to prepare for court proceedings and assist the American lawyers representing my client, Denis Katsyv, in court.

I applied for a US entry visa for a second time at the end of May 2016. Our previous experience dating back to 2014 when we (Denis Katsyv and I) applied to the US Embassy seeking visas and presented several folders full of documents containing information about why we wanted to travel to the USA – the state attorney's subpoena to show up for interrogation, the lawyers' summons, copies of documents from the case where my client and I figured as participants of court proceedings underway in the USA – did not inspire a lot of optimism regarding our chances to acquire visas this time around. Back then, the embassy responded six months later denying us visas because we had "failed to prove our intentions to return to Russia".

The lawyers' requests addressed to one of the parties in the proceedings – the district attorney's office – proved entirely futile. It would have been convenient for them, it seems, if the people they had chosen to initiate these theatrical proceedings against had no chance to prepare themselves for the start of the process (my client had spent a year paying for numerous trips of the US lawyers to Moscow instead of going to New York himself or sending me there in order to minimize the document preparation costs). This is why, when the start of the proceedings was already scheduled for October 2015 but the district attorney's office kept refusing to do anything in order to help us come to the USA to attend the interrogations of three Prevezon employees, let alone to prepare for and take part in the proceedings, as well as pretrial interviews of the witnesses and government experts, we were forced to have our lawyers appeal to court in an attempt to resolve this strange issue and request that the US government would ensure a safe arrival and, most importantly, a safe departure of our clients from the USA, under a case where Russian citizens were a party to the proceedings. In the course of the court proceedings on September 24, 2015, we finally found out that the government (the district attorney and the US State Department) were working on resolving the issue associated with Katsyv's arrival in the country even despite the fact that this very same government had previously denied him an entry visa. When interviewed by the judge, the government representatives even said that Katsyv and

three other witnesses from Russia would have immunity³³. The judge was satisfied with that but taking into account the bewilderment repeatedly expressed many times before regarding the issue as such, the judge amended his order and demanded to compensate the costs associated with preparation and interrogation of those witnesses, including the cost of services provided by third parties. These costs were covered using the funds arrested in my client's accounts, but Browder and his pet journalist Mike Weiss turned this into a whole show in the media having distorted all facts: in the December 9 issue of the Daily Beast, they published the article "Russians Stick U.S. With \$50K Plaza Hotel Bar Bill" and we even had to apply to the Chief Editor regarding the issue³⁴. Our case proceedings have been suspended since January 2016 after Browder's company filed a complaint with the court of appeals. Given that Browder did succeed in thwarting the beginning of the court proceedings that we had been waiting for and pursuing for such a long time, and given that the case proceedings were suspended, my client Denis Katsyv and I returned to Moscow in February 2016. The pass issued to me by Homeland Security upon request of the district attorney to enable me to participate in the preparations for court proceedings expired on January 30, 2017 (this second consecutive document was issued on December 17, 2015, which I used to enter the country twice, according to the stamp of the US State Department stamped upon my second entry in 2016 this parole letter authorized me to remain in the country until January 30, 201735), but given that I returned to Moscow in mid-February 2016, it was essentially cancelled when I crossed the border.

My colleagues from among American lawyers made several attempts to get assistant attorney Paul Monteleone to see if he could get that parole letter extended the way my previous ones had been or to get me a new one so I could come to prepare for the proceedings at the court of appeals on whose outcome the fate of the core case depended. When the attorney refused to help, Denis Katsyv, on his own, petitioned to immigration lawyers. He asked them for a consultation and he also asked them to help me prepare the application forms and collect the documents I would need to apply for a regular visa that would enable me to enter the USA for business and leisure purposes.

On May 25, 2016, I submitted an application for a US entry visa. In my application form I indicated that I was a lawyer and that the purpose of my trip was to help a group of American lawyers to prepare for a case, and that I was also acting as an advisor to HRAGI, an American organization. On May 31, I got confirmation that I was invited for interview for getting a B1 visa within the Moscow Business/Tourism/Crew/Journalist category³⁶. On June 1, 2016, I arrived at the US Embassy in Moscow for an interview. I had on my person a folder containing documents that included, apart from my personal information which I kindly request to keep confidential, some documents from case No.13-CV-6326, including a list of interrogations I had attended as a lawyer. The embassy officer

^{51. 33 356. 2015.09.30}

^{52. 374. 2015.10.19} order

^{53. 34} Ltr. to J. Avalon, Daily Beast 12.16.15

^{54. 35} Copy of the state parole of December 17, 2015 A206553311

^{55. 36} See appendices ___. Nonimmigrant Visa - Confirmation Page, Consular Electronic Application Center - Print Application, receipt, Message from embassy are submitted sealed and are not for publication because they contain personal information about me, my family members, and my property. This information is protected by the RF and US constitutions.

who interviewed me was unable to make a decision on his own and said he would forward my documents for verification. Having collected the list of documents (enclosed herewith), copies of the previously issued parole letters and letters from American lawyers attesting to the purpose of my trip, he advised that I would be contacted later regarding the outcome of my application. On June 6, 2016, in the afternoon, I received a telephone call from the US Embassy informing me that I could stop by the embassy to collect my passport. The caller did not say whether I had been issued a visa. I went to the embassy immediately and collected my passport at the designated window. I leafed through the passport and saw that I had been issued a three-year visa valid until June 2019.

So, on June 8, in the evening, I arrived in New York. On June 9, I attended the second district court hearing on Browder's complaint and worked on some other issues. On June 10, I went to Washington to coordinate our position with our key lawyer in Washington. On June 16, I returned from Washington to New York. On June 17, I had a meeting with our US lawyers and after that I left for Russia.

While in Washington, on June 13, 2016, I attended a screening of Andrei Nekrasov's film "The Magnitsky Act. Behind the Scenes". The screening of this film had been announced by the investigative journalist Seymour Hersh at the Museum of Journalism after the film was disallowed for public screening at Rohrabacher's subcommittee thanks to the efforts of Browder's sidekicks in US Congress. This film's trials and tribulations, its aborted screening at the Palace of Europe in Brussels, caused a lot of outrage and resentment among journalists. Opinions differed following the screening, but where the journalists were truly independent and unengaged, the feedback ranged from healthy scepticism to shock.

On June 14, 2016, I, together with Andrei Nekrasov and Rinat Akhmetshin, attended a House of Representatives International Committee meeting.

On June 14, 2016, the D. Rohrabacher's subcommittee of the US House Committee on Foreign Affairs was scheduled to hold a hearing regarding the authenticity of the story that was used as the foundation of the US Magnitsky Act adopted in 2012. The witnesses included myself, as a Russian lawyer, and Andrei Nekrasov, as a Russian filmmaker, who directed the film "The Magnitsky Act. Behind the Scenes". We delivered brief statements indicating our intentions to testify. According to the existing protocol, following a committee hearing, witnesses, even if they were not interviewed at the hearing, have the right to submit a detailed written statement within 45 days.

Having learned of the subcommittee's order of business, Browder's allies in Congress succeeded in organizing – on the very same day – an urgent US House Committee on Foreign Affairs (chaired by Ed Royce, a RP member) meeting to discuss "Relations with Putin's Russia", having invited a number of experts, including the former US Ambassador in Russia Jack Matlock (who advocates normalization of the US – Russia relations) and two Russia's adversaries represented by the former US Ambassador in Russia M. McFaul and professor of political science Leon Aron (an immigrant from the USSR).

On July 28, 2016, while being under oath, I submitted my detailed statement to the US House Committee on Foreign Affairs concerning the outcomes of my investigation of the Browder-Magnitsky case and asked that US Congress investigate the facts of Browder's criminal activities in Russia that led to the adoption of the US Magnitsky Act. It turned out, however, that my preliminary statement of June 14, 2016, was excluded from the list of documents of the June 14, 2016 hearing thanks, no doubt, to Browder's comrades in US Congress, which is why my detailed statement was not included either. ³⁷

84. What was the purpose of this trip?

The only purpose of my trip in June 2016 was to participate in the second district court hearings on the Browder's company's appeal against Judge Griesa's refusal to disqualify our case attorneys.

The court hearing was scheduled for June 9, 2016.

And, if necessary, to provide consultations to HRAGI as I stated in the form.

85. Who paid for your travel? Were any of your expenses reimbursed? If so, please explain.

Denis Katsyv. I made all the payments using my bank card and my client, Denis Katsyv, subsequently compensated all my travel-related expenses, including the airfare, hotel accommodation, etc.

86. Did you have contact with Glenn Simpson on June 8, 9, or 10, 2016? If so, please describe the contact.

No, there had been no contacts with him on specified dates.

Last week Fox News³⁸ referring to a confidential source reported that I met with Glenn Simpson before and after the meeting with Trump's son, and that "but hours before the Trump Tower meeting on June 9, 2016, Fusion co-founder and ex-Wall Street Journal reporter Glenn Simpson was with Veselnitskaya in a Manhattan federal courtroom, in a hearing on the DOJ's claim against Prevezon Holdings, a Cyprus company owned by a Russian businessman Denis Katsyv." This statement does not reflect the reality.

a) Did you inform him of the meeting at Trump Tower?

No.

b) Do you otherwise have reason to believe he was aware of the meeting at that time?

No.

^{56. 37 2016.06.14} Magnitsky testimony Rev 1

^{57. 2016.06.14} Testimony of Nataliya Veselnitskaya (Final);

^{58. 2016.06.14} nv-ra-pb email

^{59. &}lt;sup>38</sup> 2017.11.07 Fox News: Fusion GPS official met with Russian operative before and after Trump Jr. sit-down http://www foxnews.com/politics/2017/11/07/fusion-gps-official-met-with-russian-operative-before-and-after-trump-jr-sit-down.amp html

87. Did you mention or discuss the June 9 meeting with anyone who was working on the Prevezon case or the Human Rights Accountability Global Initiative Foundation?

I do not recall discussing it with anyone, perhaps because I did not consider said information privileged to share it with lawyers. But most likely I did not mention or discuss it with anyone because it proved to be useless and it did not amount to anything. I did share said information with my client, Denis Katsyv, both before the meeting and after it, on the same day.

a. Did you and the other attendees of the June 9th meeting keep it secret from the rest of the individuals working on the Prevezon case and the Human Rights Accountability Global Initiative Foundation?

I did not keep it secret though I did not try to draw unnecessary attention to the event. As a lawyer I use to keep any and all businesslike meeting secret and respect confidentiality.

I do not know if any of the other attendees kept it secret.

88. Please describe the nature of your work and interactions with Mr. Simpson and/or Fusion GPS.

In addition to what I have already mentioned when answering question No. 5, Glenn Simpson was hired by lawyers from Baker Hostetler, as well as other people who worked on the case. Some of them I have never even met. I used to receive reports from Glenn Simpson – CC-ed on all the lawyers working on the case. As far as I know, he was hired to identify Browder's potential legal ties to the United States, once we have decided his deposition was a must. Therefore, we required the information about its legal relationship with the United States. The point is that in March 2014, we deposed Todd Hyman, Special Agent for the US Department of Homeland Security, who verified the complaint with a statement that everything described in the complaint resulted from his "thorough investigation." The document he signed is in the possession of the Committee – the Second Amended Verified Complaint of October 23, 2015; Dkt. № 381³⁹, which is almost identical to the first version of the complaint dated September 10, 2013, which also was verified by Hyman. During his deposition in March 2014 Hyman testified that Browder brought in the "claim," produced "references and tables", copies of unverified documents that Hayman compared to the websites Browder pointed out to him; he also spoke with Browder's employee – Vadim Kleiner, and all backed it all with reading the Magnitsky Act. That is how the lawsuit was born, and my client's assets were seized worldwide. Browder and his people drafted the Magnitsky Act; then they wrote the complaint against my client, the US Attorney's Office copied the complaint and referred to Browder's words and to the Magnitsky Act which had already been in effect by that time. "The House Jack Built." After Browder began challenging the subpoenas served on him in Aspen, we began to further clarify his relationship with the United States, and Glenn provided us with a report on his companies, lobbyists, his visits to the White House, Congress, etc. Later Glenn also found out Browder used the notorious Mossack Fonseca known for Panama Papers to establish sham companies all over the world. Those sham companies

^{60. &}lt;sup>39</sup> 2017-04-28 CEG to FBI (follow-up to Steele letter) with attachments; 2017-03-31 CEG to DOJ (Anti-Magnitsky FARA violations) with attachments

were used to purchase real property in the US, and to participate in Hermitage Fund – Browder's hedge fund.

a. How many times have you met with Mr. Simpson?

I met Glenn Simpson on the as-needed basis, as well as whenever he came to the office to see the lawyers.

b. What were the dates of your contacts with him and what was the purpose of each contact?

I cannot name specific dates because I do not keep a log of my meetings with the people who work on the case. The system Russian lawyers use to report to their clients on the progress of their work is different from that used in the USA. I do not keep statistics of my meetings under the case in question, nor do I do so for most of my other cases, especially when I travel on business, whether it be domestically or internationally, when working on one case only.

The purpose of each meeting is to investigate and collect information I need in order to question witnesses, as well as to analyse their testimony and case documents.

c. When did you last have contact with him, whether in person, via phone, email, or other methods?

I last personally met with Glenn Simpson much longer than a year ago. I do not remeber the exact date. According to my email archive – the emails I have found where Glenn Simpson was CCed on (though he did not react to it) the most recent email I found was dated July 17, 2016, wherein one of the members of our team working on Prevezon case distributed an article by Mike Eckel, Russian 'Gun-For-Hire' Lurks in Shadows of Washington's Lobbying World, RADIO FREE EUROPE/RADIO LIBERTY (July 17, 2016). That was the very article that Hon. Mr. Chairman referred to in one of his public statements as part of the investigation 40 . Back then we did not quite realize what made that article newsworthy, because it was totally about Andrei Nekrasov's film "The Magnitsky Act. Behind the Scenes," which had been released over a month before. But it was in that very article that "all of a sudden" FARA compliance had been raised. None of us knew then that on the eve of publication of that article Browder had filed his claim to the US Department of Justice seeking me, Glenn Simpson, Rinat Akhmetshin, and others who worked on Prevezon case be brought to account for failure to register as foreign agents. We had taken bombastic claims by the author of that publication backed by some references as biased and incompetent, because everyone knew none of us had ever been an agent of a foreign State, nor worked for the Russian Government, nor received any payments from any governmental authorities, but solely focused on legal issues to provide support and assistance to our clients. However, looking back now, we can say with confidence that article was published by Browder's order immediately after him filing a claim to the DOJ on July 15, 2016. And though the article of July 17, 2016 said nothing about it, but the content thereof, far from being newsworthy as of mid-July 2016 almost identically conveys Browder's main idea of July 15, 2016:

^{61. &}lt;sup>40</sup> https://www.grassley.senate.gov/news/news-releases/complaint-firm-behind-dossier-former-russian-intel-officer-joined-lobbying-effort#_furef17

Nekrasov's film, as well as HRAGI's activities is a part of "Putin's propaganda advanced through non-registered foreign agents." Then, just as well as now, nothing has changed in my understanding and knowledge of the requirements of US law. None of us had ever been an agent of a foreign state, we did not hire anybody for lobbying or advocacy on behalf of a foreign state, none of us had received any money from any government structures, government officials, or their family members. By the way, although Mr. Simpson was CC-ed on this correspondence, he showed no reaction to it.

89. Have you ever been paid by or made payments to Mr. Simpson and/or Fusion GPS? Please include any payments made indirectly and through intermediaries.

No.

90. At the time of the meeting, who did you understand to be the source of your information regarding William Browder and the Magnitsky Act? Did you have reason to believe that Fusion GPS or Glenn Simpson had provided that information?

I didn't work with Fusion GPS. In my study, analysis and documents I partly used the information obtained in December 2014 from Glenn Simpson within the scope of his services on legal research of Browder's corporate relations, and his links to the United States, to serve a subpoena on him.

In December 2014, Mr. Simpson, or at least that's what I believed, reported that the Russian company Kameya that had been a subject of a criminal investigation in Russia since May 2007, through a chain of Cyprus offshore shell companies was owned by American companies controlled by directors and lawyers of Ziff Brothers.

My information related to criminal actions by a tax fraudster convicted in my country, Browder, whose crimes created a money trail leading to New York. And in order to deny expected future charges both in Russia and in the United States, these people came up with an unprecedented shield using tragedy and death of an individual whom Browder never actually met – the Magnitsky Act. Since 2008, all the years of anti-Russian sentiments lobbying, in simple words, rousing hatred towards Russians and Russia led to the adoption of this Act, named after an individual whose story had never been independently and professionally verified in the United States. Using the "doctrine of dirty hands and words" Browder's group managed to stifle freedom of speech, with the help of current and former officials, Congress and Senate aids, US Department of State staff members. A criminal, who renounced his US citizenship due to unwillingness to pay taxes from his offshore income, but continuing to live in the United States without paying a penny of tax, was provided an unprecedented protection from the entire US government machine against the purported "common enemy."

91. Were you aware that Mr. Simpson was simultaneously investigating Donald Trump's ties to the Russian government? Were you aware that Mr. Simpson had engaged an individual to investigate Donald Trump's ties to the Russian government?

No. For the first time ever I had read about it in a letter by the Chairman of the Committee on the Judiciary, Mr. Grassley dd. March 31, 2017 to the Deputy US Attorney General that was published

by Daily Beast on the same day⁴¹. The article reported that the Committee on the Judiciary requested a report on the DOJ's activities related to the complaint filed in 2016 by "a regular client of a murdered lawyer Magnitsky" ⁴² (literal quotation, emphasis added by NV) Hermitage Director, William Browder, about illegal actions of the "Russian Government's foreign agents," "trying to kill the bill on human rights in the United States" ⁴³ (!- emphasis added by NV), one of them was "Glenn Simpson, a co-owner of Fusion GPS which produced now-notorious "dossier" about president Trump's alleged links to the Russian Government and to Russian spies." Because the media outlet had repeatedly brought discredit upon itself due to biased and rigged publications in Browder's favor, I would not have paid any attention to the article, but this time they did not refer to Browder, but to Senator Grassley. And reportedly, the Hon. Senator relied on Browder's words. Here is another example of "the House that Jack built."

Now, courtesy of Browder, both parties are involved in this discussion.

Recent allegations that there is a causal link between the Prevezon case and the so-called "Trump dossier" is an example of how chaos can be created and grounds for mutual rejection in the absence of preliminary and competent investigation.

Any attempts to set up Glenn Simpson's work on Prevezon case as paid-for work for the Russian Government, as well as the claims about the link between this legal work and the alleged work on the so-called "Trump Dossier" are unsubstantiated and outrageous insinuations.

a. If so, how did you become aware?

See para.91

b. Did you share this information with anyone? With whom?

See para.91

92. Did you meet or communicate with any member of Congress or congressional office regarding your work related to the Prevezon Holdings case, the Magnitsky Act, the Global Magnitsky Act, William Browder, or the Human Rights Accountability Global Initiative Foundation (HRAGI)?

Yes, I had a meeting with regard to the issues in question in Moscow in early 2016.

If yes:

^{62. 41 2017.03.31} Daily Beast: Senate Asks DOJ to Probe Trump 'Dossier' Firm http://www.thedailybeast.com/cheats/2017/03/31/senate-asks-doj-to-probe-trump-dossier-firm.html?via=desktop&source=copyurl

^{63. &}lt;sup>42</sup> Magnitsky had never been a lawyer, he never had any legal background; he dealt with bookkeeping and tax optimization schemes in an extensive chain of transit and parking companies in Russia controlled by Browder since 1999. See testimony by Magnitsky and Guzheva (Magnitsky's colleague) from Browder's and Cherkasov's indictment, transcript of Guzheva's testimony in Tverskoy District Court on November 9, 2017.

^{64. 43} If that designation stands for the Global Magnitsky Act, both me and HRAGI just claimed directly opposite

a) Please provide the name of each member of Congress, congressional office, and staff with whom you met or communicated.

I met Dana Rohrabacher, Sub-Committee Chairman of the Committee on Foreign Affairs and two or three Congressmen, their aids.

On or around April 2, 2016, Dana Rohrabacher, as head of the US parliamentary delegation, accompanied by his fellow congressional representatives and the US Ambassador in Russia Mr. Taft, visited the Federation Council of the RF Federal Assembly (equivalent to the US Senate). After the meeting with Russian colleagues and fellow legislators, there was a brief meeting with representatives of the RF Prosecutor General's Office dedicated to legislative issues in Russia and the USA. The parties discussed two laws – the US law of December 14, 2012, "Sergei Magnitsky Rule of Law Accountability Act", and the RF Federal Law known as the Dima Yakovlev Act. I attended the meeting but I did not communicate with Rohrabacher in person.

On April 3, 2016, the same delegation, including the US Ambassador in Russia, attended a Valdai Club meeting in Moscow. Dana Rohrabacher delivered a poignant speech urging to toss away all the prejudices and join efforts in a fight against a real threat to humanity – terrorism⁴⁴.

On June 13, 2016, I attended the discussion of Andrei Nekrasov's film "The Magnitsky Act. Behind the Scenes" in Washington. Other attendees included US Congress and State Department officials, which was mentioned by Browder in his petition of July 15, 2016. I, however, did not speak with anyone personally at that meeting – I only listened to the bickering and disputes of the other attendees.

One of the individuals named by Browder in his petition of July 15, 2016⁴⁵ was especially memorable because he spoke almost flawless Russian to Russian journalists.

That is when I found out that it was Kyle Parker whom Browder identifies in his book as the author of the global version of the Magnitsky Act that was initially introduced for voting by Senator Cardin in 2011. Parker had worked for Cardin since the time of the Helsinki Commission⁴⁶. In his epic book, Browder rapturously narrates how Kyle Parker and he, inspired by the former Aide to the US State Secretary Jonathan Weiner ("having forgotten" to mention that Weiner had been the first to lobby Browder's interests in US Congress way back in 2008 – NV) decided to get the US State Department and Congress to first invoke presidential order No.7750 of 2004 that introduced visa sanctions against corrupt foreign officials, and then, after it was invoked (the so-called Cardin's list appeared in the summer of 2010) yet they found it insufficient for their purposes, to get US Congress to adopt the law. "13,195 bills have been introduced in US Congress since 2009 and only 386 of them have become laws. Despite all odds, we won" – this is how Browder reminisces in his book about

^{65. 44} http://ru.valdaiclub.com/multimedia/photos/vstrecha-ekspertov-kluba-valday-s-delegatsiey-kongressa-ssha/; http://ru.valdaiclub.com/events/posts/articles/kontseptsiya-zapadnoy-tsivilizatsii-pod-udarom/?sphrase_id=21524

^{66. 45 2016-06-15} HCM to the US Ministry of Justice, Section F, Paragraph 3 "Screening of the Documentary "The Magnitsky Act" in Washington" – see Appendix to the CEG inquiry to DOJ (Anti-Magnitsky FARA violations) of March 31, 2017 - https://www.judiciary.senate.gov/imo/media/doc/2017-03-31%20CEG%20to%20DOJ%20(Anti-Magnitsky%20FARA% 20violations)%20with%20attachments.pdf

^{67. 46} Chapters 32, 33 of Browder's book;

December 6, 2012 when the US Senate passed the "Jackson – Vanik Repeal and Sergei Magnitsky Rule of Law Accountability Act". If one were to believe Browder's creative writing, Kyle Parker, a US Congress official, has remained in permanent contact with him regarding the lobbying of this political act that put an end to normal relations between Russia and the USA. Later, on June 13, 2016, Parker, who had attended the screening of Andrei Nekrasov's film at the Newseum, imparted to the Congress and other governmental officials who had also attended the screening, that he had "worked with Browder on the story for seven years and knows it very well and that Nekrasov's film is a lie". Browder and his employees had collected my personal information and forwarded it to Parker approximately in April 2016 (around the time that the screening of Nekrasov's film was scandalously canceled in Brussels), which he subsequently forwarded to a man by the name of Robert Otto who used an address indicating that it may have belonged to the US government⁴⁷. This has recently surfaced in an article about my alleged wealth that was written by Browder's long-time champion, journalist Michael Weiss, for the CNN. Weiss referred to the correspondence between Browder, Parker and Otto⁴⁸, as well as the photograph which, according to him, had been taken by Parker in the conference room of the International Committee on June 14, 2016 known online as "proof of connection between Veselnitskaya and Obama administration" solely because I had sat behind the former US Ambassador in Russia M. McFaul⁴⁹. It became known from the same open sources that journalists' inquiries submitted to Senator Cardin's office regarding the Magnitsky story had been forwarded via Parker to Browder at Hermitage. The responses to those inquiries had originated from them and were subsequently forwarded by Parker to Senator Cardin's assistants in the form of draft answers to the journalists' inquiries. These circumstances give me reason to believe that Parker, indeed, was working for Browder as an unregistered lobbyist on both the Magnitsky Act and the Global Magnitsky Act precluding substantive information regarding the real facts of the Browder and Magnitsky story from reaching the Congress members. The same circumstances give me reason to believe that the confidential correspondence between the Prevezon case lawyers and a member of subcommittee of the House of Representatives International Committee attached to Browder's petition (even though unsigned) of July 15, 2016 had been forwarded to Browder by an official of the same Committee - Kyle Parker. I cannot judge the moral and ethical aspects of such actions of a Congress official, but dissemination of information outside the Congress with the view to distort it and feed it back to the Congress and US Department of Justice to undermine Congress lawyers and

^{68. &}lt;sup>47</sup> I can assume that one of the characters in Browder's book, the one identified as Kyle Scott and "head of the Russian section within the US State Department" (see Chapter 32) whom Browder met in 2010 to share his story about "the lawyer Magnitsky who had exposed a theft of \$230 million and was killed by Russians" (the phrase repeated by Browder practically in each of his responses given to the US Senate even if the questions concerned entirely different subjects) was in reality Robert Otto who, if one were to believe this correspondence, coordinated the collection of information about everyone who exposed the Magnitsky story yet insisted at the same time that he knew better than anyone else how to expose it as a lie, admitting that Browder had used the entire US government resource to "propagate his legend".

^{69. &}lt;sup>48</sup> CNN 2017/09/16 By Michael Weiss: The curious rise of Natalia Veselnitskaya, the Russian lawyer who met Team Trump http://edition.cnn.com/2017/09/16/opinions/curious-rise-of-russian-lawyer-veselnitskaya-opinion-weiss/index html

^{70. 49} https://www.youtube.com/watch?v=3OwgcqX0fcE,

^{71. 2017.07.12}_TheHill-Exclusive_DOJ let Russian lawyer into US before she met with Trump team http://thehill.com/homenews/administration/341788-exclusive-doj-let-russian-lawyer-into-us-before-she-met-with-trump?amp

^{72.} Oh My GOD_ The True Identity of The Russian 'Lawyer' Just Leaked & It's Worse Than Anyone Imagined _ informed folks

officials is a clear case of complicity in interference of administration of justice and legislative process.

b) Please provide the date of each communication and/or meeting.

See answer in para. "a" above

c) Please provide copies of all documents and communications related to these meetings or communications.

I have never passed anything personally to Mr. Rohrabacher and I have never discussed with him personally either the Magnitsky Act or the law banning adoption. I explained to one of the congressional representatives, someone from the finance committee, I think (I did not take note of his name), how money was flowing from the USA to Russia and back to the USA via a chain of transit offshore companies managed by Browder in the interests of HSBC and Ziff Brothers. I also explained to him where he could, if he wanted to, find additional information about Browder's lies in Congress in 2012 prior to the adoption of the US act, having referred, in particular, to the Prevezon case, the Prevezon lawyers' objections to the US Government petition to recognize the facts (doc. 418⁵⁰), and the verbatim record of the court hearing of November 30, 2015 (doc. 470⁵¹). This took place approximately on April 3, 2016 in the Valdai Club building (see description in para. "a").

93. Did you meet or communicate with staffers for the Hillary Clinton for President campaign regarding your work related to the Prevezon Holdings case, the Magnitsky Act, the Global Magnitsky Act, William Browder, or the Human Rights Accountability Global Initiative Foundation (HRAGI)? If yes:

No. But if there were such an opportunity then I would meet.

a) Please provide the name of each campaign associate with whom you met or communicated.

See answer in para. "93" above

b) Please provide the dates of each communication and/or meeting.

See answer in para. "93" above

c) Please provide copies of all documents and communications related to these meetings or communications.

See answer in para. "93" above

94. Beyond any meetings or communications in which you participated, are you aware of any meetings or communications on behalf of Prevezon or HRAGI with any member of Congress, congressional office, or presidential campaign? If yes:

I am not aware of any meetings with any members of Congress on behalf of Prevezon.

^{73. 50 418.} Memorandum of Law in Opposition to Motion 2015.11.17

^{74. &}lt;sup>51</sup> 470. 2015.11.30

I am not aware of any meetings between anybody acting for Prevezon and HRAGI with any presidential campaign officials.

The meeting on June 9, 2016 between me and the son of my good friend was not a meeting with the "presidential campaign."

a) Please provide the name of each member of Congress, congressional office, congressional staff, or campaign staff who met with Prevezon or HRAGI representatives.

Rinat Akhmetshin engaged in meetings with Congressional staff. He acted on behalf of HRAGI.

b) Please provide the date of each communication and/or meeting.

I am not positively aware of the dates or identities of all the people whom Rinat Akhmetshin met with. According to him, he spoke with Dana Rohrabacher, Paul Behrends, and perhaps with someone else whose names I do not remember.

I also know from Rinat Akhmetshin, that he was approached by phone by Kyle Parker, Senior Legislative Aide to congressional commissioners, who threatened him with serious trouble and charges unless he stops trying to pursue an investigation against Browder in the Committee on Foreign Affairs.

c) Please provide copies of all documents and communications in your possession related to these meetings or communications.

I do not have

Conclusion

Analysing the chronology of the "espionage saga", I am almost certain today that the information about this meeting, formally public knowledge since April 6, 2017 when, as the media pointed out, Mr. Kushner submitted a revised security form⁵², was being prepared for stove-piping during the court proceedings on the Prevezon case. It was carefully guarded from dissemination, unlike other information provided by Mr. Kushner. But by then, the US Senate Judiciary Committee was already aware of the statement that Browder made on July 15, 2016 following the screening of Nekrasov's film in Washington, the film, directed by an independent documentary maker who is not being paid by any of the interested parties, that exposed Browder's global lies.

And it was only after the Prevezon case was closed, on the eve of Browder's testimony concerning the activities of alleged foreign agents – in reality, all his opponents and people capable of disproving his lies – this cheap information is fed to the media to smash everything in its wake. Hundreds of government employees and representatives of the voters are working on this investigation spending time and taxpayers' money; careers crumble and reputations are destroyed; people are smeared with public accusations, humiliated and insulted; people are losing friends and acquire enemies and all of this is being done to American citizens. Who benefits from this? Russia? For what? Not to resolve a

^{75. 52} The Hill Kushner left Russian meetings off security clearance forms

^{76.} http://thehill.com/homenews/administration/327753-kushner-didnt-disclose-meetings-with-russians-on-security-clearance; The New York Times. Retrieved July 18, 2017. Becker, Jo (July 11, 2017). "Donald Trump Jr. and Russia: How The Times Connected the Dots".

single issue? Maybe those who want Russia and the USA to lose any mental, spiritual, and politico-economic connection forever?

Browder's team has achieved an unprecedented unity of the two parties in their anti-Russian ideology. And it has become unimportant that several million US citizens are Russian, and that Russian is one of the eight official voting languages in New York City. It is sad and dispiriting to watch a great country doing the bidding of master manipulators and throwing itself into an engineered chaos.

I do not expect anyone, in the current circumstances, to understand what I have written here and to realize that we are not enemies. Nor do I expect anyone to begin, finally, to examine the original cause of this skillfully managed freak show and Browder's testimony and the motives of his global media campaign and this threadbare story about the Rule of Law Accountability Act named after a person that Browder had barely even known (according to Magnitsky's testimony given in 2006 and 2008, he had met Browder once or twice in 1996 - 2003) – Browder was never interested in the life of this Russian man; he was only interested in his death.

Still, I believe that the truth will not disappear no matter how hard you try to conceal it. We shall survive this, too.

I hope the information and documents provided would be useful. Please, do not hesitate to contact me with any questions or requests for further assistance that I am able to answer, while maintaining a balance between the Committee's legitimate right to seek information and my duties as an attorney to safeguard my client's privileges.

Respectfully,

Natalia Veselnitskaya

Moscow November 20, 2017

EXHIBIT