

Dear Mr. Dilanian,

The answer to your questions of 29 April 2016 are below.

I also have some further questions for you which I would like answered before you publish your article. In your previous questions (no 5, 8, 9, 10) you referred to "court records." Please could you specify exactly which court records you refer to, so that we can properly address your query.

Please let me know if you have any further questions.

Bill Browder

[Attachment 1: Reply to questions from April 29, 2016](#)

Issue 1: Beating

In your first question, you ask:

"First, regarding your description of Magnitsky being beaten to death, I wanted to clarify and give you a chance to answer. We cited the Public Oversight Commission for Human Rights Observance in Moscow Detention Centers, which examined Magnitsky's treatment in jail, and is here in English: <http://online.wsj.com/public/resources/documents/WSJ-20091229-MagnitskyReport.pdf> or <http://russian-untouchables.com/docs/D24.pdf> That report, as we said, concludes Magnitsky died as a result of medical neglect and makes no mention of beating. Your attorney appeared to be referencing a different report, by the Presidential Council for Human Rights, titled, "Preliminary Conclusion of the working group on the study of circumstances of Sergey Magnitsky's death." <http://russian-untouchables.com/rus/docs/Civil-Right-Council-conclusion-report-Executive-summary-ENG.pdf>. The latter report says he was deprived of medical care, and that "there is reasonable suspicion to believe that the death was triggered by beating." However, the head of the working group, Kirill Kabanov, now repudiates that and other conclusions in the report, which he said were always considered preliminary. In a sworn affidavit given to Prevezon's lawyers and filed in U.S. district court, Kabanov said some of the report's conclusions were "copied verbatim," from documents submitted by you and your associates. In an interview with NBC News, Kabanov said his panel found "no evidence whatsoever about beatings... The results of official forensic expertise that used original biological materials showed no evidence of beatings." I wanted to give you a chance to comment on Kabanov's remarks.

My comments on Kabanov's remarks that his panel found "*no evidence whatsoever about beatings... The results of official forensic expertise that used original biological materials showed no evidence of beatings*" are as follows:

Kabanov's current remarks are in direct contradiction to the 2011 Presidential Human Rights Council Report; the Russian state forensic medical examination of Sergei Magnitsky; Medical expertise No 555, 17 August 2011; a protocol signed by 3 officers at Matrosskaya Tishina on 16 November 2009; and statements made by the human rights activists who investigated Sergei's death. These documents evidence the existence of a beating and clearly refute Kabanov's recent statements that his panel