

# KOBRE & KIM LLP

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April 27, 2016

## BY EMAIL

Katheryn D. Harris, General Counsel, NBC Universal  
Steve Burke, CEO, NBC Universal  
Mark Hoffman, Chairman, NBC Broadcasting  
Andrew Luck, Chairman, NBC News and MSNBC  
NBC Universal  
30 Rockefeller Plaza  
New York, NY 10112

**URGENT:** regarding article with posted deadline of April 27, 2016

**Re: Reporter Ken Dilanian's Article on Sergei Magnitsky**

Dear Ms. Harris:

We write on behalf of our client, William Browder. We have reviewed media between your journalist, Ken Dilanian, and Mr. Browder.<sup>1</sup> Mr. Dilanian has indicated that he intends to publish today an article regarding certain allegations that Mr. Browder "concocted the story of Magnitsky as a whistleblower to cover up [his] own alleged tax fraud."

Based on Mr. Dilanian's questions and responses to Mr. Browder to date, it is clear that although Mr. Dilanian claims to have investigated these allegations, he has not read the key documents, which are both publicly available and have been provided by Mr. Browder, and which clearly demonstrate the falsity of the claims against Mr. Browder.

If Mr. Dilanian believes he has conducted a complete investigation—without carefully reading key documents—he has seriously breached journalistic standards and should be removed from this story. Given that there is no urgency in publishing this story, we urge NBC to delay publishing until someone has thoroughly reviewed the relevant evidence.

<sup>1</sup> See attached as Exhibit A.