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April 27, 2016

BY EMAIL

Katheryn D. Harris, General Counsel, NBC Universal
Steve Burke, CEO, NBC Universal
Mark Hoffmann, Chairman, NBC Broadcasting
Andrew Luck, Chairman, NBC News and MSNBC
NBC Universal
70 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.¹ 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.

¹ See attached as Exhibit A.