

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNIVERSITIES OF AMERICA,

Plaintiff,

v.

PREVISON HOLDINGS LTD., et al.,

Defendants,

ALL RIGHT, TITLE AND INTEREST IN THE
REAL PROPERTY AND APPURTENANTS
KNOWN AS THE 20 FINE STREET
CONDOMINIUM, 20 FINE STREET, NEW
YORK, NEW YORK (2001), UNIT 1804 (20
FINE STREET, UNIT 1804), et al.,

Defendants in Rem.

Case No. 13-cv-00326 (EPG)

REPLY CASE

**DECLARATION OF IRENE
KABANOFF**

I, IRENE KABANOFF, hereby declare as follows:

1. I am the Head of the National Anti-Corruption Committee ("Anti-Corruption
NAC"), a Russian non-governmental organization ("NGO") established in 1999 to assess
corruption, track and counter measures, study corruption practices, and support anti-
corruption activities. The Committee was founded by many people, including Sergei
Vladimirovich Buzgalin (who later became the Chairman of the Accounts Chamber of the
Russian Federation monitoring financial control over state expenditures), former Deputy
Chairman of the Government of the Russian Federation Boris Nemtsov and Henry Malochuk
Bogach, the Head of the Moscow College of Lawyers. Committee members include former
Russian journalists and political figures, including deputies of the State Duma of Russia. There
have been five Heads of the Committee since 2001 via election, which requires the vote of at least two-
thirds of all the committee members.