

you are right. We will pay.”

That happened with Browder’s Hermitage shell companies. His companies paid out the entirety of their 2006 profits and then claimed a full tax refund. He claims that the companies were stolen from him by the Russian tax police who in June 2007 searched his office and that of his accountant, Firestone Duncan, and stole documents and seals used to reregister the companies.

That is not possible, since the only way to change ownership of Russian companies is for the designated authority to go in person to the registry or to file the change through an owner’s power of attorney. The latter was done by Browder’s Cyprus shell. More about that separately. Of course, Magnitsky as the Hermitage accountant would have known that. And that no documents or seals can reregister anything.

Browder claims he hired “the lawyer” Magnitsky in 2007 after the search and that Magnitsky was arrested because he “blew the whistle” on the fraud, accusing tax investigators of using documents to steal the companies. That is a lie not only on the “hiring” but on the whistle-blowing.

First, Magnitsky was first interrogated in October 2006, over a year before the offices were searched. About Hermitage tax evasion.

Second, if Magnitsky discovered anything before his November 2008 arrest, there is no