

BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
John W. Moscow

BAKER & HOSTETLER LLP
Washington Square, Suite 1100
1050 Connecticut Ave.,
Washington, D.C. 20036
Telephone: (202) 861-1677
Facsimile: (202) 861-1783
Mark A. Cymrot

BAKER BOTTS LLP
30 Rockefeller Plaza
New York, New York 10112-4498
Telephone: (212) 408-2500
Facsimile: (212) 408-2501
Seth T. Taube
Richard B. Harper

*Attorneys for Prevezon Holdings LTD.,
Prevezon Alexander, LLC, Prevezon Soho USA, LLC,
Prevezon Seven USA, LLC, Prevezon Pine USA, LLC,
Prevezon 1711 USA, LLC, Prevezon 1810 LLC,
Prevezon 2009 USA, LLC, Prevezon 2011 USA, LLC,
Ferencoi Investments, LTD. and Kolevins LTD.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

-against-

PREVEZON HOLDINGS LTD.,
FERENCOI INVESTMENTS LTD.,
KOLEVINS, LTD., *et al.*,

Defendants.

**DECLARATION OF MARK A. CYMROT
IN SUPPORT OF FED. R. CIV. P. 45(b)(4)
STATEMENT**

NO. 13-CV-6326 (TPG)

ECF CASE

I, MARK CYMROT, hereby declare as follows:

1. I am a member of the bar of this Court and a partner at BakerHostetler LLP, and am counsel of record for the above-captioned Defendants in this action.

2. I respectfully submit this Declaration in support of Defendants' Federal Rule of Civil Procedure 45(b)(4) Statement.

3. Attached hereto as Exhibit 5 is a true and correct excerpt of an Accurint report for William F. Browder.¹ Accurint is a comprehensive database of public records that is used to locate information about persons and entities.

4. Attached hereto as Exhibit 6 is a true and correct copy of a filing made by Sundance Aspen LLC with the Colorado Secretary of State dated April 2, 2014.

5. Attached hereto as Exhibit 7 is a true and correct copy of documents obtained from the Pitkin County (Colorado) Assessor's website for [REDACTED].²

6. Attached hereto as Exhibit 8 is a true and correct copy of a print out from the Clark County (Nevada) Property Assessor's website for 54 Colleton River Dr., Henderson, NV 89052.

7. Attached hereto as Exhibit 9 is a true and correct copy of the LinkedIn profile for Vickie Tarantino.

8. Attached hereto as Exhibit 10 is a true and correct copy of a print out from the Nevada Secretary of State's website for Victoria Tarantino Consulting LLC.

¹ The Accurint report has been excerpted to leave out information relating to William Browder's possible relatives, which are unnecessary for this filing, and to his neighborhood, as his counsel has requested redaction of his home address.

² William Browder's home address has been redacted at his counsel's request.

9. Attached hereto as Exhibit 11 is a true and correct copy of documents obtained from the State of Colorado Motor Vehicle Division for an automobile with the license plate 124-YJS.

10. Attached hereto as Exhibit 12 is a true and correct copy of a print out from the Aspen Action Forum's website for Bill Browder.

11. Attached hereto as Exhibit 13 is a true and correct copy of the agenda for the 2014 Aspen Action Forum.

12. Attached hereto as Exhibit 14 is a true and correct excerpt of an Accurint report for Michael C. Foley.³

13. Attached hereto as Exhibit 15 is a true and correct copy of a filing made by Acme Property Management, Inc. with the Colorado Secretary of State dated March 31, 2014.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 14, 2014
Washington, DC

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Mark A. Cymrot

Mark A. Cymrot
Washington Square, Suite 1100
1050 Connecticut Ave.,
Washington, D.C. 20036
Telephone: (202) 861-1677
Facsimile: (202) 861-1783
mcyrot@bakerlaw.com

Attorney for Defendants

³ The Accurint report has been excerpted for length and relevance.