

Exhibit 4

** CONFIDENTIAL **

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x

UNITED STATES OF AMERICA,)
)
) Plaintiff,)

- vs-)

No. 1:13-CV-06326

PREVEZON HOLDINGS, LTD, FERENCOI)
) (TPG)
) INVESTMENTS LTD, KOLEVINS LTD,)
) et al.,)
) Defendants.)

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Confidential Videotaped Deposition of OLEG A.
LURIE, taken by Defendants, at the offices of
Baker Hostetler, 45 Rockefeller Plaza, New York,
New York, on October 8, 2015, commencing at 9:46
a.m., before Jeffrey Benz, a Certified Realtime
Reporter, Registered Merit Reporter and Notary
Public within and for the State of New York.

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1 APPEARANCES:
 2
 3 US ATTORNEY'S OFFICE
 4 FOR THE SOUTHERN DISTRICT OF NEW YORK
 5 Attorneys for the Plaintiff
 6 One St. Andrews Plaza
 7 New York, New York 10007
 8 BY: PAUL MONTELEONI, ESQ.
 9 MARGARET GRAHAM, ESQ.
 10
 11 BAKER HOSTETLER
 12 Attorneys for Defendants
 13 1050 Connecticut Avenue NW
 14 Washington, D.C. 20036-5304
 15 BY: PAUL M. LEVINE, ESQ.
 16 LOURA L. ALAVERDI, ESQ. (Remote)
 17 NICHOLAS M. ROSE, ESQ. (Remote)
 18
 19 ALSO PRESENT:
 20 JOSE RIVERA, Videographer
 21 KONSTANTIN GARNOV, Russian Interpreter
 22 NATALIYA VESELNITSKAYA (Remote participant)
 23 IZABELLA SARKISYAN (Remote participant)
 24 MURAT GLASHEV (Remote participant)
 25 ANDREY GINGLING (Remote participant)

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1
 2 IT IS HEREBY STIPULATED AND AGREED by and
 3 between the attorneys for the respective parties
 4 herein that filing and sealing be and the same are
 5 hereby waived.
 6 IT IS FURTHER STIPULATED AND AGREED that all
 7 objections, except as to the form of the question,
 8 shall be reserved to the time of the trial.
 9 IT IS FURTHER STIPULATED AND AGREED that the
 10 within deposition may be signed and sworn to
 11 before any officer authorized to administer an
 12 oath with the same force and effect as if signed
 13 and sworn to before the Court.
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1 Lurie - Confidential
 2 THE VIDEOGRAPHER: This is Media Unit
 3 Number 1 in the video deposition of Oleg
 4 Lurie in the matter of United States of
 5 America, plaintiff, against Prevezon
 6 Holdings, Limited, et al., defendants, in
 7 the United States District Court, Southern
 8 District of New York, Case Number 1:13-
 9 cv-06326 TPG.
 10 This deposition is being held at
 11 BakerHostetler, LLP, 45 Rockefeller Plaza,
 12 New York, New York, on October 8, 2015, at
 13 approximately 9:46 a.m.
 14 My name is Jose Rivera from the firm
 15 of Elisa Dreier Reporting Corp. and I am
 16 the legal video specialist. The court
 17 reporter is Jeff Benz, in association with
 18 Elisa Dreier Reporting Corp., located at
 19 950 Third Avenue, New York, New York.
 20 For the record, will counsels please
 21 introduce themselves.
 22 THE INTERPRETER: Hold on a second,
 23 let me translate everything.
 24 MR. MONTELEONI: Paul Monteleoni and
 25 Margaret Graham from the U.S. Attorney's

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1 Lurie - Confidential
 2 Office of the Southern District of New
 3 York.
 4 MR. LEVINE: Paul Levine of
 5 Baker Hostetler for defendants.
 6 And also in the deposition room today
 7 are Izabella Sarkisyan, S-A-R-K-I-S-Y-A-N,
 8 of Baker Botts, Murat Glashev, and Andrey
 9 Gingling. Glashev is G-L-A-S-H-E-V and
 10 Gingling is G-I-N-G-L-I-N-G, both
 11 representatives from Nataliya
 12 Veselnitskaya's office.
 13 MR. MONTELEONI: And just so that the
 14 record is clear, I assume you were
 15 referring to those -- those last three
 16 individuals were in the deposition room at
 17 the remote location by video. And would
 18 you be able to say the address of that
 19 remote location?
 20 MR. LEVINE: That is correct. The
 21 address for the deposition in Moscow is
 22 being held at the offices of Baker Botts,
 23 Suite 450, Ducat Place II, D-U-C-A-T, 7
 24 Ulitsa, U-L-I -- U-L-T-S-A, Gasheka,
 25 G-A-S-H-E-K-A, Moscow, 123056.

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1 Lurie - Confidential
 2 KONSTANTIN GARNOV
 3 was duly sworn to translate from English
 4 into Russian and from Russian into English.
 5 OLEG A. LURIE,
 6 called as a witness, having been first
 7 duly sworn by Jeffrey Benz, a Notary Public
 8 within and for the State of New York, was
 9 examined and testified as follows:
 10 EXAMINATION BY MR. LEVINE:
 11 Q. Good day, Mr. Lurie.
 12 Have you ever been --
 13 A. Good day.
 14 Q. Have you ever testified before in an
 15 American court proceeding?
 16 A. No. I only made -- I only made a
 17 declaration, which...
 18 I only made the declaration, which...
 19 THE INTERPRETER: The interpreter
 20 asked the witness to continue, and he said
 21 that's -- that's all I wanted to say.
 22 Q. Okay. So I'm going to be asking you
 23 questions and then the interpreter will be
 24 translating those questions for you.
 25 A. Thank you. I understand.

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1 Lurie - Confidential
 2 Q. And occasionally there will be
 3 objections from the government or -- or -- in --
 4 when they're questioning, I will be objecting.
 5 Please continue to answer the question unless
 6 someone instructs you not to answer, even if
 7 there is an objection. Do you understand?
 8 A. Yes. I understand.
 9 Q. Because we're doing a translated
 10 deposition, if you do not have an opportunity to
 11 give your full answer after -- after you -- you
 12 stop for a second, please inform us on the
 13 record and we will give you an opportunity to
 14 give a full answer. Do you understand?
 15 A. Thank you. Understand.
 16 Q. All right. Could you state your full
 17 name, including your patronymic, for the record?
 18 A. Oleg Anatolovic Lurie.
 19 Q. And when were you born?
 20 A. May 3, 1963.
 21 Q. And where were you born?
 22 A. City of Kharkov, USSR.
 23 MR. LEVINE: And I believe the
 24 spelling of Kharkov in English is
 25 K-H-A-R-K-O-V.

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1 Lurie - Confidential
 2 Q. Where do you currently reside?
 3 A. I currently reside in Russia in the
 4 city of Moscow.
 5 Q. And what is your current occupation?
 6 A. I'm a journalist.
 7 Q. Did you graduate from high school?
 8 A. Yes.
 9 Q. When?
 10 A. In 1980 in the city of Kharkov.
 11 Q. Did you eventually attend university?
 12 A. Yes, I did.
 13 Q. Where did you attend university at?
 14 A. I attended Kharkov State University.
 15 Q. Did you graduate from Kharkov State
 16 University?
 17 A. Yes.
 18 Q. And what degree did you obtain?
 19 A. Okay. Department of philology,
 20 majoring in Russian language, Russian
 21 literature.
 22 Q. And did you attend -- when did you
 23 graduate from Kharkov University?
 24 A. In 1989.
 25 Q. Did you attend any other universities?

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1 Lurie - Confidential
 2 A. Yes, yes. I graduated from Russian
 3 New University, or Novy University, in 2004,
 4 department of economics, majoring in finance and
 5 credit.
 6 Q. When did you start your journalism
 7 career?
 8 A. I began working as a journalist in
 9 1980.
 10 Q. And have you had any written articles
 11 published in any mass media publications?
 12 A. Yes.
 13 Q. Could you identify some of the mass
 14 media publications where your written have
 15 appeared in?
 16 A. Yes, I could.
 17 Okay. Sovershenno Sekretno newspaper,
 18 can be translated as top secret; Novaya Gazeta,
 19 new newspaper; Versiya, version newspaper; VVP
 20 Magazine; U.S. edition, U.S. News & World
 21 Report; the Internet; Readers; Den, which is
 22 translated as day; and magazine Vslukh, meaning
 23 out loud. The list is long.
 24 Q. You mentioned U.S. News & World
 25 Report. What article did you have published in

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1 Lurie - Confidential
 2 U.S. News & World Report?
 3 A. Okay. It was an art -- it was an
 4 article about fraud committed by family of
 5 ex-president of Russia, Boris Yeltsin, about
 6 money laundering done by members of his family.
 7 Q. Have you ever appeared in any mass
 8 media radio outlets in Russia?
 9 A. Yes. I do it on all the time. I do
 10 it on a regular basis, on a weekly basis.
 11 Q. Can you identify some of the outlets
 12 that you appear in on the radio?
 13 A. One of them is the most popular radio
 14 outlet, called Vesti FM, V-E-S-T-I, where almost
 15 every week I participate in one-hour program
 16 hosted by Vladimir Solovyov, a prominent
 17 journalist, and the program is called Polniy
 18 Kontakt, meaning full contact.
 19 Q. Have you ever appeared on any
 20 television programs in Russia?
 21 A. Yes.
 22 Q. And which stations have you appeared
 23 on?
 24 A. On major TV stations, ORT is the
 25 abbreviation, Russia 1, Russia 24, NTV, and

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1 Lurie - Confidential
 2 others.
 3 MR. LEVINE: Did you say --
 4 THE INTERPRETER: N as in Nancy, not
 5 MTV.
 6 Q. Have you ever won any awards for your
 7 journalism?
 8 A. Yes. Yes, I have.
 9 Q. Which awards have you won for your
 10 journalism?
 11 A. Okay. In 2004 I was awarded in Great
 12 Britain the Order of Saint Stanislaus, second
 13 grade, and I also was awarded Silver Star.
 14 Q. Why were you awarded the Order of
 15 Saint Stanislaus award?
 16 A. For my contribution to the world
 17 journalism.
 18 Q. And why were you awarded the Silver
 19 Star?
 20 A. For the same. I was awarded at the
 21 same time.
 22 Q. Have you ever met a person by the name
 23 of Sergei Magnitsky?
 24 A. Yes.
 25 Q. And when was the first time you met

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1 Lurie - Confidential
 2 Mr. Magnitsky?
 3 A. May I come with a request?
 4 Q. Sure.
 5 A. In order not to mix up the dates,
 6 because many years have passed since those
 7 events, I would like to ask the representative
 8 of the law office presented here to get a copy
 9 of my declaration, which is the part of the case
 10 already, I believe.
 11 Q. Okay. Do you recall when was the
 12 first time that you met Sergei Magnitsky?
 13 A. Yes, of course. It was in August of
 14 2009.
 15 Q. Okay. And do you recall the specific
 16 date?
 17 A. Approximately August 8 or 9 of 2009.
 18 Q. And where were you when you met
 19 Magnitsky?
 20 A. I was in Butyrka prison. Butyrka,
 21 B-U-T-Y-R-K-A.
 22 Q. Where in Butyrka prison did you meet
 23 Magnitsky?
 24 A. Okay. I met him at the collection
 25 cell, so-called. This is the cell where

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1 Lurie - Confidential
 2 prisoners are accumulated before being
 3 transported to court to meet with their
 4 attorneys and where they spent on average
 5 several hours.
 6 Q. What were you doing in the collection
 7 area at that time?
 8 A. I waited there most likely after
 9 meeting with my attorney or I was either waiting
 10 to meet with my attorney or came back from the
 11 meeting with my attorney.
 12 Q. Okay. And approximately how long were
 13 you in the collection cell before you saw
 14 Magnitsky?
 15 MR. MONTELEONI: Objection.
 16 A. About 30 minutes. 30, 40 minutes. I
 17 cannot tell you exactly.
 18 MR. LEVINE: Can the government of the
 19 United States identify who's defending and
 20 taking this deposition right now?
 21 MR. MONTELEONI: I will be making
 22 the -- making the objections. When it
 23 comes to asking questions, Ms. Graham will
 24 be asking the questions.
 25 MR. LEVINE: Okay. Well, I object to

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1 Lurie - Confidential
 2 that procedure, but I will carry on.
 3 MR. MONTELEONI: I would just note
 4 that we're doing it this way because we
 5 have been taking this deposition on short
 6 notice to accommodate the last minute
 7 adjournment requests for the defendants of
 8 the depositions that we intended to
 9 schedule at this time. We appreciate your
 10 accommodation.
 11 I apologize. And there are also
 12 personal reasons which we will be happy to
 13 discuss off the record.
 14 MR. LEVINE: Could we take a short
 15 break and go off the record so we can
 16 discuss some of those personal reasons.
 17 THE VIDEOGRAPHER: The time is
 18 10:14 a.m. and we're going off the record.
 19 (A recess was taken.)
 20 THE VIDEOGRAPHER: The time is
 21 10:19 a.m. and we're back on the record.
 22 THE WITNESS: Okay. I can hear you.
 23 Q. Before -- did you eventually speak to
 24 Magnitsky while you were in the collection area?
 25 A. Yes, I have.

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1 Lurie - Confidential
 2 Q. Okay. Prior to speaking to Magnitsky
 3 on August 8 or August 9, what were you doing in
 4 the -- in the collection area?
 5 MR. MONTELEONI: Objection.
 6 A. I waited to be escorted to my cell
 7 most likely after the meeting with my attorney.
 8 Q. Were you talking with any -- were you
 9 talking with any of the other people in the
 10 collection area?
 11 A. Yes; with many.
 12 Q. And what were you discussing?
 13 A. In Butyrka prison I was held at
 14 so-called thieves hall. That's a block where
 15 the most dangerous and notorious thieves are
 16 being held. And by that time I already had lot
 17 of experience being held in Butyrka prison, so
 18 when I entered the collection cell, other
 19 inmates begin asking me questions, a lot of
 20 questions, of legal nature, of personal nature,
 21 about living in the prison, and so this was the
 22 thieves block despite the fact that I was held
 23 being accused of a white-collar crime.
 24 Q. Why were you being held in the thieves
 25 block if you were accused of a white-collar

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1 Lurie - Confidential
 2 crime?
 3 MR. MONTELEONI: Objection.
 4 A. I was held at the thieves block
 5 because I was a journalist and I tried to fight
 6 various violations connected with various
 7 regulations, not very good conditions for the
 8 inmates, and that's why I was sent to that
 9 special block, because I wrote complaints and I
 10 tried to expose flaws and violations of various
 11 regulations.
 12 Q. So when you -- when you met Magnitsky
 13 on or around August 9, who approached who first?
 14 Did you approach Magnitsky or did he approach
 15 you?
 16 A. I did not know Magnitsky, but he knew
 17 me. That's why he approached me and asked to
 18 talk to me.
 19 Q. All right. And can you describe
 20 Magnitsky's physical well-being when he came up
 21 to you and --
 22 MR. MONTELEONI: Objection.
 23 A. Magnitsky's physical well-being was
 24 absolutely normal. He looked well -- well
 25 dressed, carefully dressed, cared after. His

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1 Lurie - Confidential
 2 hair was combed. He looked just like a regular
 3 inmate. He did not stand out from other inmates
 4 at all.
 5 Q. Did you know anything about Magnitsky
 6 before he approached you and asked to speak with
 7 you?
 8 A. No. Absolutely nothing.
 9 Q. Did you accept Magnitsky's invitation
 10 to have a conversation?
 11 MR. MONTELEONI: Objection.
 12 A. Of course. I accepted it and we spoke
 13 vis-a-vis.
 14 Q. Tell us everything he said to you and
 15 you said to him that you can recall in that
 16 conversation.
 17 A. Yes, of course. Although more than
 18 six years passed since that time, I will tell
 19 you that Magnitsky asked me for advice, what to
 20 do in his situation.
 21 He approached me with a request. He
 22 said that he already had people in the --
 23 taking -- having higher-up positions both in
 24 Russia and abroad who want him to be silent or
 25 keep silence about their actions and they will

<p style="text-align: right;">Page 18</p> <p>1 Lurie - Confidential 2 take him out of the prison within days. 3 His problem was as follows: His 4 attorneys, upon the request of the higher-ups 5 helping him, asked him to write a great number 6 of complaints for various reasons, both minor 7 and various large-scale, global problems. He 8 did not understand -- he did not understand why 9 he had to do that, but he followed their 10 request. 11 And Sergei Magnitsky was concerned -- 12 and that was the reason why he approached me -- 13 that his complaints will lead to problems for 14 other inmates both in the cells where he was 15 held and in other cells. He said that he didn't 16 want troubles for other inmates because as a 17 result of his complaints, searches in cells were 18 conducted, the conditions for various inmates 19 were changed. 20 So my suggestion was to make those 21 complaints somewhat absurd, for example, to 22 measure cubic meters of air in cells and mention 23 it in his complaints so no verification of 24 complaints would follow. 25 And I also told him that his attorneys</p>	<p style="text-align: right;">Page 20</p> <p>1 Lurie - Confidential 2 promises not to leave his residence, and after 3 that he would flee the country. And he also 4 mentioned where; he said to England. 5 And after that I sincerely wished him 6 good luck. And I don't remember who was taken 7 from that collection cell first, me or him. 8 And, once again, I would like to 9 underscore that I do not remember and I do not 10 know how Magnitsky ended up in the collection 11 cell, whether he came from his meeting with an 12 attorney, whether he was transferred from one 13 cell into another, where he came from, an 14 integration and -- questioning, rather. And the 15 same thing that I don't remember is whether I 16 was on my way from the meeting with my attorney 17 or waiting for a meeting with my attorney. 18 Q. During the course of this conversation 19 with Magnitsky on or around August 9, 2009, did 20 he tell you where he was being held in Butyrka 21 prison? 22 MR. MONTELEONI: Objection. 23 A. Yes, he did. 24 Q. What did he tell you? 25 A. He told me that he was held in the big</p>
<p style="text-align: right;">Page 19</p> <p>1 Lurie - Confidential 2 and people who claim to be standing behind him 3 are lying to him. I told him that he will not 4 be released, they will not be able to assist in 5 him going out, because that was 2009 and nobody 6 was released at that time, and he did not 7 believe me. 8 But he insisted that people who stood 9 behind him are very powerful, especially those 10 outside of Russia. He would repeat that they 11 will save him, that they would take him out of 12 there, and he also said that his crime is not 13 serious. 14 I told him to look around, and there 15 were many people who stole merchandise or items 16 worth hundred dollars and they were held in 17 custody, but he did not believe me. He claimed 18 that people in the West will help him. He also 19 asked me to assist him in avoiding conflicts 20 with other inmates. He also got so carried away 21 by this discussion with me that he told me that 22 soon he would have been released on his own 23 recognizance, just signing -- just -- 24 THE INTERPRETER: Just one second. 25 A. -- signing a document, where he</p>	<p style="text-align: right;">Page 21</p> <p>1 Lurie - Confidential 2 special block. I know what this block is. It's 3 a cellblock for white crime inmates with cells 4 with plasma TV sets, refrigerators, kettles. 5 And those are comfortable cells other inmates 6 can only dream about. Majority of those cells 7 had telephone communication installed illegal. 8 Q. Approximately how long was your 9 conversation with Magnitsky on or around 10 August 9, 2009? 11 A. I cannot tell you exactly, but maybe 12 10 to 20 minutes. 13 Q. How was Magnitsky acting during that 14 course -- during the course of that 15 conversation? 16 MR. MONTELEONI: Objection. 17 Q. Let me rephrase my question. 18 How did you perceive Magnitsky was 19 acting during the course of that conversation on 20 August 9, 2009? 21 MR. MONTELEONI: Objection. 22 A. He was in quite happy mood. He was 23 anticipating freedom. And he was almost certain 24 that within a day or two he would be released, 25 three, five, maybe ten days, he will be out.</p>

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1 Lurie - Confidential
 2 And he left a very good impression on me by
 3 worrying that other inmates might have problems
 4 caused by his complaints. But overall he was in
 5 a good mood and he was smiling.
 6 Q. After your conversation with Magnitsky
 7 on or around August 9, 2009, were you ever
 8 transferred out of Butyrka prison to another
 9 facility?
 10 MR. MONTELEONI: Objection.
 11 A. Yes. I was transferred to prison to
 12 serve time, but that was in the second part of
 13 August. August 19, I believe.
 14 Q. Okay.
 15 A. So I was sent to prison to serve time.
 16 Q. Okay. So on or around August 19,
 17 2009, you were transferred out of Butyrka prison
 18 and -- and sent to another prison, if I
 19 understand your testimony correctly?
 20 MR. MONTELEONI: Objection.
 21 A. Yes, that's true.
 22 Q. Before you were transferred out of
 23 Butyrka prison on or around August 19, 2009, did
 24 you meet Magnitsky for a second time?
 25 MR. MONTELEONI: Objection.

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1 Lurie - Confidential
 2 A. Yes, I did.
 3 Q. And -- and approximately when did that
 4 second meeting with Magnitsky occur?
 5 A. I cannot give you an exact -- an exact
 6 date. But that was between August 15 and
 7 August 18, 16th, maybe 18th, a few days prior my
 8 transfer. That was approximately eight to ten
 9 days after our first meeting.
 10 Q. Where did you meet Magnitsky for the
 11 second time?
 12 A. We met at one of the collection cells.
 13 One of the collection cells. There are quite a
 14 few of those.
 15 Q. And -- and what were you doing in the
 16 collection area? Why -- why were you in the
 17 collection area?
 18 A. I don't remember. Either I was
 19 returning from my meeting with my attorney or I
 20 was transferred from one cell to another.
 21 Q. At this second meeting who approach --
 22 who approached who? Did Magnitsky approach you
 23 or did you approach Magnitsky?
 24 A. I cannot tell you exactly. We saw
 25 each other, our eyes met, we shake hands and

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1 Lurie - Confidential
 2 started talking.
 3 Q. And -- and tell me everything that you
 4 said to him and he said to you during the course
 5 of your conversation.
 6 MR. MONTELEONI: Objection.
 7 A. Magnitsky was a completely different
 8 person at that time. He was a tangle of nerves
 9 and he immediately started telling me what
 10 happened to him. I did not know where he
 11 obtained -- wherefrom he obtained the
 12 information, either from his attorneys or
 13 through illegal cell phone communication.
 14 But the information was as follows:
 15 He said that he was deceived, he was used and
 16 deceived. They -- and by "they" he obviously
 17 meant his western connections -- made him sign
 18 testimonies and then -- he refused to do so.
 19 And it turned out that nobody wanted to assist
 20 him in getting out in the first place so he said
 21 that he was deceived.
 22 I did not expect to see him in such
 23 condition. He was a well-mannered person and I
 24 did not expect him to use foul language that he
 25 did. He uttered obscenities and he said

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1 Lurie - Confidential
 2 numerous times that he was deceived and that he
 3 would probably never get out.
 4 And I asked him, Sergei, what are
 5 those testimony -- this testimonies about? Is
 6 it related to your case in any way?
 7 And he said, No, it was not.
 8 I suggested that he spoke with an --
 9 his investigator with regard to the testimony
 10 that he was demanded to sign, but he said that
 11 it doesn't -- it didn't make any sense because
 12 it was a completely different case.
 13 And he was in a terrible psychological
 14 condition and he said that his psychological
 15 condition affected his physical condition. I
 16 honestly took a pity of him, because I saw his
 17 condition and it was terrible.
 18 And the last thing he told me during
 19 that conversation was that his western
 20 employers, so western people who stood behind
 21 him, deceived him. They demanded him to sign
 22 various documents that he didn't want to sign.
 23 And he also told me that he had a feeling that
 24 he would never get out of there. By "there" I
 25 mean prison.

<p style="text-align: right;">Page 26</p> <p>1 Lurie - Confidential</p> <p>2 And the last phrase he told me, and I</p> <p>3 remember that phrase, he said, You were right</p> <p>4 during our previous meeting when you told me not</p> <p>5 to trust anyone.</p> <p>6 (The interpreter spoke to the witness in</p> <p>7 Russian.)</p> <p>8 A. You were right that I would be</p> <p>9 deceived and nobody will assist in letting me</p> <p>10 out.</p> <p>11 Q. During the course of your description</p> <p>12 of this conversation you mentioned that he</p> <p>13 stated his western people who stood behind him</p> <p>14 deceived him. Did he specifically mention</p> <p>15 his -- his -- his his western people?</p> <p>16 MR. MONTELEONI: Objection.</p> <p>17 THE INTERPRETER: The interpreter</p> <p>18 needs a moment to check the dictionary.</p> <p>19 A. He did not mention their names. He</p> <p>20 called them patrons or employers. And he did</p> <p>21 not say west, he said outside of Russia, meaning</p> <p>22 west.</p> <p>23 Q. What assistance, if any, did you offer</p> <p>24 Magnitsky during the course of this</p> <p>25 conversation?</p>	<p style="text-align: right;">Page 28</p> <p>1 Lurie - Confidential</p> <p>2 he was killed because he revealed fraud. So</p> <p>3 completely different opinions were published in</p> <p>4 media.</p> <p>5 Q. During your time in prison did you</p> <p>6 ever see a prisoner being physically abused in</p> <p>7 any way by any prison personnel?</p> <p>8 A. During the two years I spent in that</p> <p>9 prison I personally did not see any instance of</p> <p>10 physical abuse against a prisoner.</p> <p>11 Q. Did you ever hear that a prisoner was</p> <p>12 physically abused?</p> <p>13 MR. MONTELEONI: Objection.</p> <p>14 A. During the time I was held in Butyrka</p> <p>15 prison there was only one time where -- when an</p> <p>16 inmate was hit by rubber pacifier or a stick.</p> <p>17 And it caused 3.5 thousand inmates go on a</p> <p>18 hunger strike. Information about that was</p> <p>19 published in the media and -- just because of</p> <p>20 that one instance, and the administration of the</p> <p>21 prison found it very difficult to end this</p> <p>22 crisis in prison. And I participated in that</p> <p>23 hunger strike as well.</p> <p>24 Q. When -- when were you released from</p> <p>25 prison?</p>
<p style="text-align: right;">Page 27</p> <p>1 Lurie - Confidential</p> <p>2 MR. MONTELEONI: Objection.</p> <p>3 A. The assistance I offered was</p> <p>4 medication, a prescription medication. He said,</p> <p>5 No, I don't need it, I have everything I need.</p> <p>6 Q. To your perception was -- did -- did</p> <p>7 you observe anything that would have indicated</p> <p>8 that Magnitsky had been physically abused while</p> <p>9 at Butyrka prison during the course of your</p> <p>10 conversation with him?</p> <p>11 MR. MONTELEONI: Objection.</p> <p>12 A. No, nothing of the kind.</p> <p>13 Q. After you were transferred out of</p> <p>14 Butyrka prison on August 19, 2009, did you ever</p> <p>15 meet Magnitsky again?</p> <p>16 A. No.</p> <p>17 Q. Did you ever learn what happened to</p> <p>18 Magnitsky?</p> <p>19 A. Yes. I learned later from mass media</p> <p>20 reports and I saw his photograph and I realized</p> <p>21 that it was that Sergei I spoke with.</p> <p>22 Q. And -- and what did you learn about</p> <p>23 him?</p> <p>24 A. I learned that he died, he got sick</p> <p>25 and died. And I also read in other media that</p>	<p style="text-align: right;">Page 29</p> <p>1 Lurie - Confidential</p> <p>2 A. I was released on December 25, 2011.</p> <p>3 Q. What -- did you -- did you return to</p> <p>4 work after you left prison?</p> <p>5 MR. MONTELEONI: Objection.</p> <p>6 A. Yes. I returned to journalism.</p> <p>7 MR. LEVINE: Can we take a short</p> <p>8 break.</p> <p>9 THE VIDEOGRAPHER: The time is</p> <p>10 11:06 a.m. and we're going off the record.</p> <p>11 (A recess was taken.)</p> <p>12 THE VIDEOGRAPHER: This begins Media</p> <p>13 Unit Number 2. The time is 11:18 a.m. and</p> <p>14 we're back on the record.</p> <p>15 Q. In your return to journalistic work,</p> <p>16 what investigations, if any, did you do</p> <p>17 regarding Magnitsky?</p> <p>18 A. We talking about investigations I did</p> <p>19 that -- connected with Magnitsky, that was with</p> <p>20 regard to inadequate quality of medical care in</p> <p>21 Russia's pretrial facilities.</p> <p>22 I also investigated Mr. Magnitsky's</p> <p>23 employer, Mr. William Browder, and his possible</p> <p>24 connections to fraud.</p> <p>25 Q. And as a result of those</p>

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1 Lurie - Confidential
2 investigations concerning William Browder, what
3 did you discover?
4 A. I discovered that William Browder was
5 directly linked with Hermitage Capital fund,
6 which was founded by Edmond Safra, who died in
7 strange circumstances after a loan from IMF in
8 the amount of \$4.7 billion was given to Russia
9 and disappeared. It was on -- in around August
10 of 1998.
11 Also results of my investigations can
12 be found in my articles, in various media, which
13 is an open source.
14 Q. As a -- as a result of your
15 investigations into Browder and Magnitsky, were
16 you contacted by anyone to discuss your
17 interactions with -- with Magnitsky in the mass
18 media?
19 MR. MONTELEONI: Objection.
20 A. Yes.
21 Q. And who contacted you?
22 A. After 2014, when a film called
23 Sherlock Holmes investigates Magnitsky's death
24 was out, and this is the film where I
25 investigated Magnitsky's connections to William

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1 Lurie - Confidential
2 Browder and -- and where I told about my
3 conversations with Magnitsky, I was approached.
4 And I also, after the film came to light,
5 participated in Vesti FM program, which I've
6 already mentioned. And also spoke about the
7 film.
8 I was approached by certain people who
9 claimed to be connected with William Browder and
10 who offered me money in exchange for
11 substituting real facts with lie.
12 Q. Okay. So as part of your
13 investigation concerning Magnitsky, what other
14 interviews where Magnitsky was a participant
15 were you able to find?
16 MR. MONTELEONI: Objection.
17 A. No, I was not aware of any interviews
18 with Magnitsky with any journalists. I believe
19 I was the last journalist Magnitsky spoke with.
20 Q. You earlier testified that you
21 participated in a Vesti FM program on a -- on a
22 regular basis. Did you ever speak about
23 Magnitsky on the Vesti FM program?
24 MR. MONTELEONI: Objection.
25 A. Yes, of course.

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1 Lurie - Confidential
2 Q. And -- and what show did you discuss
3 Magnitsky on?
4 A. The show is called Full Contact or
5 Polniy Kontakt in Russian.
6 Q. And -- and do you recall when you had
7 this discussion on the radio concerning
8 Magnitsky?
9 A. It was in the fall of 2014.
10 Q. Do you recall the specific date?
11 A. No. But this program is on the
12 Internet and I'll be able to find -- find it.
13 Q. Okay. What did you discuss on that
14 program?
15 A. I discussed -- discussed the fact that
16 I met with Magnitsky twice and during those
17 encounters I realized that the situation was
18 different from what was portrayed by some media
19 and western politicians. And I also promised to
20 tell in greater detail about my conversations
21 with Magnitsky.
22 Q. And how is what you experienced
23 different from the portrayal in the western
24 media?
25 MR. MONTELEONI: Objection.

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1 Lurie - Confidential
2 MR. LEVINE: Let me strike that
3 question.
4 Q. How is what you experienced different
5 from the portrayal by some media and western
6 politicians?
7 MR. MONTELEONI: Objection.
8 MR. LEVINE: Let me strike that one.
9 Q. How is what you experienced in your
10 interactions with Sergei Magnitsky different
11 from the portrayal by some media and western
12 politicians?
13 A. Judging by what I saw in Butyrka
14 prison and knowing the system and observing
15 Sergei and possessing certain general
16 information, I came to the conclusion that
17 nobody killed Sergei Magnitsky and that he also
18 had to sign the documents and -- which he was
19 made to sign, he didn't want to do it, but he
20 had to sign them.
21 And I also came to the conclusion that
22 Magnitsky was not related to any investigation
23 of his case.
24 Q. In the days following your radio
25 broadcast on Vesti FM where you discussed

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1 Lurie - Confidential
2 Magnitsky, who contacted you, if anyone,
3 regarding your statements on the air?
4 MR. MONTELEONI: Objection.
5 A. Yes, I was contacted.
6 Q. By who?
7 A. I received a call to my official cell
8 phone number, which is known to many people, and
9 the person introduced himself as Maxim and he
10 said that he represented influential people in
11 the west and he offered me to get in touch with
12 his representative in Russia and to change my
13 opinion and to solve the financial issue,
14 meaning that he would wanted me to change his
15 opinion with regard to Magnitsky, and the
16 financial question will be resolved based on
17 that.
18 Q. Okay. So to be clear, how did Maxim
19 contact you?
20 A. He called my cell phone. He called my
21 cell phone.
22 Q. And do you recall when he -- what date
23 he first called you?
24 A. It was beginning of November of 2014.
25 Q. And when Maxim called, what, if

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1 Lurie - Confidential
2 anything, did you do to ensure that you would
3 remember what you guys -- what you and Maxim
4 discussed on the telephone call?
5 MR. MONTELEONI: Objection.
6 A. Certainly. Yes, of course. Of
7 course.
8 Q. What did you do?
9 A. Due to the fact -- due to the fact
10 that I from time to time receive threats due to
11 my journalist activity, I record all calls from
12 unknown numbers. And I recorded all calls with
13 Maxim. Correction, with the person who
14 introduced himself as Maxim, because I'm not
15 sure that -- that was his real name.
16 Q. And how did you go about recording
17 that telephone call?
18 A. I turned the speakerphone on my cell
19 phone and I saw -- and I turned the recorder on
20 my second cell phone. And in that way I
21 recorded the conversation which took place on my
22 first cell phone on the second cell phone.
23 Q. Where did you store the recording of
24 that phone call between you and Maxim?
25 A. I stored it in my cell phone, in my

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1 Lurie - Confidential
2 second cell phone, and I also copy it to a flash
3 drive.
4 Q. Is -- is the version you recorded on
5 your second phone call of the conversation
6 between you and Maxim still contained on that
7 second cell phone?
8 MR. MONTELEONI: Objection.
9 A. Yes, of course.
10 MR. LEVINE: Okay. At this time I
11 would like to mark as Exhibit A a copy of
12 Mr. Lurie's declaration. It is -- it
13 contains an English language-certified
14 translation of the Russian language
15 declaration signed by Mr. Lurie.
16 Following the declaration there are
17 five exhibits, all of which are referenced
18 in the declaration. They include a -- a
19 certified transcription of recordings
20 followed by a certified translation of
21 those recordings.
22 (English language-certified translation
23 of the Russian language declaration signed by
24 Mr. Lurie, with attachments was marked Lurie
25 Exhibit A for identification, as of this

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1 Lurie - Confidential
2 date.)
3 MR. LEVINE: And -- and this
4 declaration is also available at Document
5 249 and 249, 1 through 5, of the court
6 proceedings in this litigation.
7 I'm also going to introduce what we'll
8 mark as Exhibit B. Exhibit B contains five
9 recordings, each one of which is marked as
10 Exhibit 1 through 5.
11 Exhibit 1 in Exhibit B corresponds
12 with Exhibit 1 in Exhibit A. Exhibit 2 in
13 Exhibit B corresponds with Exhibit 2 in
14 Exhibit A. Exhibit 3 in Exhibit B
15 corresponds with Exhibit 3 in Exhibit A.
16 Exhibit 4 in Exhibit B corresponds with
17 Exhibit 4 in Exhibit A. And Exhibit 5 in
18 Exhibit B corresponds with Exhibit 5 in
19 Exhibit A.
20 (CD with five recordings designated as
21 Exhibits 1 through 5 was marked Lurie Exhibit
22 B for identification, as of this date.)
23 MR. LEVINE: I'm now going to play
24 Exhibit 1 in Exhibit B.
25 With the permission of the Government,

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1 Lurie - Confidential
 2 I'm going to ask the translator not to
 3 translate the recording. Do you have any
 4 objection to that?
 5 MR. MONTELEONI: No objection.
 6 Q. Mr. Lurie, if you cannot hear the
 7 recording, please let me know.
 8 (The interpreter and the witness spoke
 9 to one another.)
 10 (Audio clip was played.)
 11 Q. Were you able to hear that, Mr. Lurie?
 12 A. Yes, of course.
 13 Q. Can you identify the voices on that
 14 recording?
 15 A. Yes, I can. I can hear my voice and
 16 the voice of the person who introduced himself
 17 as Maxim.
 18 Q. I'm going to play the recording again,
 19 just the beginning of it. Could you identify
 20 who the first speaker on the recording is and
 21 could you identify who the second speaker on the
 22 recording is?
 23 (Audio clip was played.)
 24 Q. Could you identify who the first
 25 speaker on the call was?

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1 Lurie - Confidential
 2 A. The first speaker is myself.
 3 Q. And then the second speaker, whose
 4 voice sounds more faint on the phone call, can
 5 you identify who that was?
 6 A. Yes. It's the voice of the person who
 7 introduced himself as Maxim.
 8 Q. Is the recording we just heard as
 9 Exhibit 1 of Exhibit B identical to the
 10 recording you made in your telephone
 11 conversation with Maxim?
 12 A. Absolutely identical.
 13 Q. It was a relatively short
 14 conversation. Why did it end so quickly?
 15 A. Because I thought that the recording
 16 on the second phone did not start. That's why I
 17 decided to end the conversation and to test the
 18 recording on the second phone and hoping that
 19 the person will call back.
 20 Q. This method of recording phone calls
 21 that you described earlier, where you'll take
 22 one cell phone and turn its speakerphone on and
 23 then you'll take a second cell phone and use it
 24 to record the phone call, have you ever recorded
 25 phone calls this way prior to your conversation

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1 Lurie - Confidential
 2 with Maxim?
 3 A. Yes, I did, because I believe this is
 4 the most convenient way because the recording is
 5 stored on the second phone, not the one which is
 6 used for conversation.
 7 Q. Approximately how many times have you
 8 recorded phone calls in -- using this method?
 9 A. I cannot answer this question. I
 10 don't know. But the number -- the number of
 11 times is big enough.
 12 Q. More than a hundred times?
 13 A. I cannot answer exactly because the
 14 majority of the phone conversations that I begin
 15 to record, I erase them as soon as I understand
 16 that it is of no interest to me and this
 17 recording will not help me in the future.
 18 Q. After you ended the call with Maxim,
 19 what was the next thing that happened?
 20 MR. MONTELEONI: Objection.
 21 A. He called back several minutes later.
 22 Q. And -- and what, if anything, did you
 23 do to ensure that you would remember the second
 24 phone call from Maxim?
 25 MR. MONTELEONI: Objection.

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1 Lurie - Confidential
 2 A. Yes. I recorded it.
 3 Q. And how did you record the second
 4 phone call from Maxim?
 5 A. Using the second cell phone and the
 6 speakerphone.
 7 Q. The same method as you used to record
 8 the first phone call.
 9 A. Yes.
 10 Q. And where did you store the recording
 11 of the second phone call?
 12 A. On the cell phone, on the second cell
 13 phone, and I also copied it to a flash drive.
 14 Q. And is the original recording that you
 15 copied to the second cell phone still available
 16 on the second cell phone?
 17 A. Yes.
 18 MR. LEVINE: So right now I'm going to
 19 play Exhibit 2 of Exhibit B. Once again,
 20 I'm going to only play it in Russian and
 21 ask the translator not to translate. And
 22 Mr. Monteleoni indicated he does not object
 23 to that process.
 24 A translation of Exhibit 2 of
 25 Exhibit B, the second phone call recording

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1 Lurie - Confidential
 2 with Maxim, is also available as Exhibit 2
 3 to Exhibit A, which is Mr. Lurie's
 4 declaration.
 5 (Audio clip was played.)
 6 Q. Were you able to hear that recording,
 7 Mr. Lurie?
 8 A. Yes.
 9 Q. Do you recognize the voices on that
 10 recording?
 11 A. Yes.
 12 Q. Whose voices are on the recording?
 13 A. My voice and the person who introduced
 14 himself as Maxim. Max, Maxim.
 15 Q. Is the recording of the second phone
 16 call between you and Maxim reflected on
 17 Exhibit 2 of Exhibit B an identical reproduction
 18 of the second phone call you had with Maxim --
 19 MR. MONTELEONI: Objection.
 20 Q. -- that you recorded?
 21 MR. MONTELEONI: Objection.
 22 A. Yes, it is.
 23 Q. I'm going to replay the beginning of
 24 the recording again. And so you can identify
 25 the voices on it, I'll play a short portion of

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1 Lurie - Confidential
 2 it. And what I want you to do is I will stop it
 3 and then ask you a few questions regarding the
 4 voices.
 5 (Audio clip was played.)
 6 Q. Were you able to hear that?
 7 A. Yes.
 8 Q. The first speaker on the call with the
 9 deeper voice, can you identify that person's
 10 voice?
 11 A. Yes. It's me.
 12 Q. And the second speaker on the call
 13 whose voice sounds more faint than the first
 14 speaker, can you identify that person's voice?
 15 A. Yes. It's the -- it's the person who
 16 introduced himself as Maxim in his conversation
 17 with me.
 18 Q. During the second phone call you had
 19 with Maxim that we just heard a recording with,
 20 who did you guess Maxim was calling on behalf
 21 of?
 22 MR. MONTELEONI: Objection.
 23 A. In my assumptions the call was on
 24 behalf of Mr. William Browder.
 25 Q. Why did you come to that conclusion?

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1 Lurie - Confidential
 2 A. Because during subsequent meetings
 3 with the representative of Maxim, William
 4 Browder was named.
 5 And, secondly, I believe that only
 6 William Browder might have been interested in me
 7 changing my views and opinions about Sergei
 8 Magnitsky's situation.
 9 Q. During the second phone conversation
 10 with Maxim was any other person referenced
 11 during that call of note to you?
 12 MR. MONTELEONI: Objection.
 13 A. Two names were mentioned. First when
 14 I trying to guess who this call was on behalf
 15 of, I said, William? And I was interrupted by
 16 the other speaker asking me not to utter names.
 17 And, secondly, the name Mark, from
 18 Moscow, was the name of the person who should
 19 have gotten in touch with me.
 20 Q. Who did you believe this Mark was?
 21 MR. MONTELEONI: Objection.
 22 THE INTERPRETER: The interpreter
 23 needs to consult a dictionary.
 24 (The interpreter and the witness spoke.)
 25 THE INTERPRETER: Just to clarify the

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1 Lurie - Confidential
 2 meaning, because it has many meanings.
 3 A. I cannot tell you exactly, I can only
 4 assume, and this is my assumption, that Mark was
 5 Mark Feygin, a defense attorney, who defended
 6 Pussy Riot punk group after their desecration of
 7 a cathedral in Moscow and who is now defending
 8 Nadezhda Savchenko --
 9 THE INTERPRETER: I'll spell it for
 10 you.
 11 A. -- a gun leader for Ukrainian troops
 12 whose actions led to death of Russian troops
 13 during the conflict in Ukraine.
 14 Another fact that led me to this
 15 assumption was that I saw Mark Feygin together
 16 with Mr. Browder on TV at a number of meetings
 17 of opposition nature.
 18 Q. Is Mark a common Russian name?
 19 A. No.
 20 MR. LEVINE: Could the translator
 21 please spell the name that he said he would
 22 spell earlier.
 23 THE INTERPRETER: Okay. First name is
 24 Nadezhda, N-A-D-E-Z-D-A, last name is
 25 Savchenko, S-A-V-C-H-E-N-K-O.

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1 Lurie - Confidential
 2 Q. After this second telephone
 3 conversation with Maxim, when was the next time
 4 you spoke to him?
 5 MR. MONTELEONI: Objection.
 6 A. Approximately 30 minutes later.
 7 Q. And did he call you or did you call
 8 him?
 9 A. I did not have his cell phone -- his
 10 phone.
 11 THE INTERPRETER: Scratch cell.
 12 A. He called me.
 13 Q. What, if anything, did you do to
 14 ensure that you would be able to remember this
 15 third conversation on the telephone between you
 16 and Maxim?
 17 MR. MONTELEONI: Objection.
 18 A. Yes. Just the same procedure, I used
 19 a speakerphone and the second cell phone to
 20 record it.
 21 Q. The same way that you recorded the
 22 first two conversations you had with Maxim that
 23 day?
 24 A. Yes.
 25 Q. And where did you store the recording

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1 Lurie - Confidential
 2 of your third telephone conversation with Maxim?
 3 A. On my second phone, exactly where the
 4 first two.
 5 Q. And is -- that third telephone
 6 conversation recording, does it still exist on
 7 your second phone today?
 8 A. Yes.
 9 MR. LEVINE: I'm now going to play the
 10 third conversation you had with Maxim. It
 11 is Exhibit 3 to Exhibit B. A transcription
 12 and translation are available as Exhibit 3
 13 to Exhibit A. I'm going to ask that the --
 14 we play the recording and the translator
 15 not have to translate the -- the -- the
 16 recording.
 17 Any objection from the government?
 18 MR. MONTELEONI: No.
 19 (Audio clip was played.)
 20 Q. Were you able to hear the recording,
 21 Mr. Lurie?
 22 A. Yes.
 23 Q. And do you recognize the -- the voices
 24 on -- on the recording?
 25 A. Yes.

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1 Lurie - Confidential
 2 Q. And whose voices are on the recording?
 3 A. My voice and the voice of the person
 4 who introduced himself as Maxim.
 5 Q. Is the recording we just heard, which
 6 is Exhibit 3 to Exhibit B, an identical
 7 reproduction of the recording of the third phone
 8 conversation you had with Maxim that you
 9 recorded and stored on your -- your second cell
 10 phone?
 11 MR. MONTELEONI: Objection.
 12 A. Yes.
 13 Q. I'm going to play the beginning of the
 14 recording again, and then I will ask you to
 15 identify whose voice is who for -- and if you
 16 could -- I'll play it, just a small snippet, and
 17 then ask you a few questions.
 18 (Audio clip was played.)
 19 Q. The -- were you able to hear that?
 20 A. Yes, yes.
 21 Q. The first voice we heard on the
 22 recording of your third phone conversation with
 23 Maxim, the deeper voice, whose voice is that?
 24 A. That's my voice.
 25 Q. And the second voice on the recording,

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1 Lurie - Confidential
 2 whose voice is that?
 3 A. That's the voice of the person who
 4 introduced himself as Maxim in his conversation
 5 with me.
 6 Q. What did you discuss on this third
 7 phone conversation with Maxim?
 8 A. Mark informed me that circumstances
 9 changed and that Mark is a rather known person
 10 and he didn't want two known people meeting and
 11 instead of Mark, a person named Vladimir will
 12 get in touch with me.
 13 Q. Just to be clear, did -- did Mark
 14 inform you of that or was -- Maxim inform you
 15 that?
 16 MR. MONTELEONI: Objection.
 17 A. Maxim, Maxim. Yes, it's Maxim who
 18 called me.
 19 Q. And the two -- two names beginning
 20 with V are referenced on -- on the phone call,
 21 one is a Vladimir and one is a Volodya, who --
 22 who is Volodya?
 23 A. In Russian Volodya is shortened
 24 version of Vladimir, like William and Bill.
 25 MR. LEVINE: All right. I think this

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1 Lurie - Confidential
 2 would be a nice time to take a -- a lunch
 3 break. Let's go off the record.
 4 THE VIDEOGRAPHER: The time is
 5 12:26 p.m. and we're going off the record.
 6 (Luncheon recess at 12:26)
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1 Lurie - Confidential
 2 A F T E R N O O N S E S S I O N
 3 (1:22 p.m.)
 4 OLEG A. LURIE
 5 resumed, having been previously duly
 6 sworn by a Notary Public, was
 7 examined and testified further
 8 as follows:
 9 THE VIDEOGRAPHER: The time is
 10 1:22 p.m. and we're back on the record.
 11 CONTINUED EXAMINATION BY MR. LEVINE:
 12 Q. Hello again, Mr. Lurie.
 13 A. Hello.
 14 Q. When we left for the break, you had
 15 just testified that you were told by Maxim that
 16 you would be receiving a phone call from a
 17 Vladimir.
 18 Did Vladimir eventually call you?
 19 A. Yes, he did, and I even remember the
 20 date. It was on the 6th or on the 7th -- no, on
 21 the 6th of November last year, 2013.
 22 Q. When Vladimir called you, did you
 23 recognize his phone number?
 24 A. No. He had unknown number, other
 25 private number option turned on.

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1 Lurie - Confidential
 2 Q. And were you able to record this phone
 3 call with Vladimir?
 4 A. No. I wasn't able to. Because due to
 5 my journalistic activities, I was at an
 6 interview.
 7 Q. And what did you and Vladimir discuss
 8 on your phone call on November 6 -- was it 2013
 9 or 2014?
 10 A. 2014.
 11 Q. Okay. What did you and Vladimir
 12 discuss on your phone call on November 6, 2014?
 13 A. The phone conversation lasted less
 14 than one minute, and he introduced himself as
 15 Vladimir from Maxim, and we agreed to meet at
 16 the bar, next day.
 17 The bar locate at Radisson Ukraine
 18 hotel. It's on Kutuzovsky, K-U-T-U-Z-O-V-S-K-Y,
 19 Prospect, in Moscow.
 20 Q. Did you -- did you agree to meet with
 21 him on November 6 or were you guys agreeing to
 22 meet on November 7?
 23 A. I cannot give you the exact date. But
 24 around that time. That day or the next day.
 25 Q. Okay. Did you eventually meet with

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1 Lurie - Confidential
 2 Vladimir at the Radisson Ukraine hotel as you
 3 discussed in your telephone conversation?
 4 A. Yes.
 5 Q. And did you do anything to ensure that
 6 you would be able to remember your meeting with
 7 Vladimir?
 8 MR. MONTELEONI: Objection.
 9 A. Yes.
 10 Yes. I recorded our conversation.
 11 Q. How did you go about recording your
 12 conversation?
 13 A. I put my first cell phone on the
 14 table, and showed that I'm not recording
 15 anything. At the same time, my second cell
 16 phone was on the chair next to me, and the
 17 record was turned on.
 18 Q. Had you ever recorded a conversation
 19 in this way before?
 20 A. Yes.
 21 Q. Approximately how often do you recall
 22 recording a conversation like that?
 23 A. No. I did it several times before,
 24 and that was a long time ago. But this time
 25 around, I anticipated that some kind of a

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1 Lurie - Confidential
 2 provocation was prepared against me. And I
 3 decided to record it.
 4 Q. Where did you store the recording of
 5 this conversation?
 6 A. On my second cell phone, where the
 7 previous phone conversations were also stored.
 8 Q. Is the original recording of your
 9 conversation with Vladimir on November 6 or 7,
 10 2014, at the Radisson Ukraine hotel in Moscow,
 11 still retained on that cell phone where you
 12 recorded it?
 13 A. Yes.
 14 Q. Okay.
 15 MR. LEVINE: I'm now going to play a
 16 recording. It is marked as Exhibit 4 of
 17 Exhibit B. A transcription and a
 18 translation thereto is attached to
 19 Exhibit A as Exhibit 4 thereto.
 20 Subject to any objection by the
 21 government, I'm going to ask that the
 22 translator not translate the entire
 23 recording.
 24 MR. MONTELEONI: No objection.
 25 MR. LEVINE: It is quite a lengthy

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1 Lurie - Confidential
 2 recording. I'm going to ask that we play
 3 the whole thing, and that everyone try to
 4 be quiet throughout the playing of the
 5 whole recording.
 6 (Audio clip was played.)
 7 Q. Were you able to hear the recording,
 8 Mr. Lurie?
 9 A. Yes.
 10 Q. Can you identify the voices on the
 11 recording?
 12 A. Yes.
 13 Q. And --
 14 A. One voice is mine. The second voice
 15 belongs to a person with whom I met and who
 16 identified himself as Vladimir.
 17 Q. Is the -- recording that we just
 18 played, Exhibit onto Exhibit B, an identical
 19 reproduction of the recording of the
 20 conversation you had with Vladimir and stored on
 21 your second cell phone, on or around November 6,
 22 2014, at the Radisson Ukraine hotel in Moscow?
 23 MR. MONTELEONI: Objection.
 24 A. Yes. It is.
 25 Q. Is the recording that we just played,

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1 Lurie - Confidential
 2 as Exhibit 4 to Exhibit B, an identical
 3 reproduction of the recording of the
 4 conversation you had with Vladimir at the
 5 Radisson Ukraine hotel in Moscow on November 6,
 6 2014?
 7 MR. MONTELEONI: Objection.
 8 A. Yes, it is.
 9 Q. And is the recording that we just
 10 played as Exhibit 4 of Exhibit B an identical
 11 reproduction of the recording that you stored on
 12 your second cell phone of that conversation you
 13 had with Vladimir at the Radisson Ukraine hotel
 14 in Moscow on November 6, 2014?
 15 MR. MONTELEONI: Objection.
 16 A. Yes, it is.
 17 MR. LEVINE: Mr. Monteleoni, can you
 18 tell me the basis of your objection?
 19 MR. MONTELEONI: The questions were
 20 all leading and they typically made
 21 assumptions about the witness's knowledge
 22 that were not established by the evidence.
 23 Q. The recording that we just listened
 24 to, as Exhibit 4 of Exhibit B, did you ever
 25 listen to the original recording of that off of

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1 Lurie - Confidential
 2 your cell phone?
 3 MR. MONTELEONI: Objection.
 4 A. Yes. I listened.
 5 Q. The recording that we listened to, as
 6 Exhibit 3 of Exhibit B, did you ever listen to
 7 that recording off of your cell phone?
 8 MR. MONTELEONI: Objection.
 9 A. I didn't understand, what recording
 10 we're talking about? We're talking about the
 11 last recording we just heard?
 12 Q. The third phone conversation with
 13 Maxim, did you ever listen to that recording on
 14 your cell phone?
 15 MR. MONTELEONI: Objection.
 16 A. Yes, of course.
 17 Q. The second phone call that you had
 18 with Maxim, which was identified as Exhibit 2 to
 19 Exhibit B, did you ever listen to that off of
 20 your cell phone?
 21 MR. MONTELEONI: Objection.
 22 A. Yes, I did.
 23 Q. And the first phone call that you had
 24 with Maxim, that you recorded, which was
 25 identified as Exhibit 1 to Exhibit B, did you

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1 Lurie - Confidential
2 ever listen to that recording off of your cell
3 phone?
4 MR. MONTELEONI: Objection.
5 A. Yes, I did.
6 Q. The recording that we just listened
7 to, of your conversation between Vladimir and
8 you, on or around November 6, 2014, at the
9 Radisson Ukraine hotel in Moscow, what
10 information was conveyed to you that you felt
11 was important during that conversation?
12 MR. MONTELEONI: Objection.
13 A. In my opinion, the important
14 information, which was conveyed to me by the
15 person I met with, was the fact that he said
16 that he represented Mr. William Browder, and
17 that he offered me a large amount of money in
18 exchange for me changing my truthful and
19 principled position with regard to Magnitsky's
20 case, and other issues related to that.
21 Q. After this conversation with Vladimir,
22 on November 6, 2014, when was the next time you
23 spoke with him?
24 MR. MONTELEONI: Objection.
25 MR. LEVINE: Strike that.

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1 Lurie - Confidential
2 Q. After this conversation with Vladimir
3 on November 6, 2014, did you speak with him
4 again?
5 A. Yes.
6 Q. When was the next time you spoke to
7 Vladimir after November 6, 2014?
8 A. I cannot tell you the exact date, but
9 approximately ten days after our first meeting.
10 Q. And --
11 A. I don't remember it now. The date.
12 Q. Okay.
13 So approximately ten days after your
14 first meeting on or around November 6, 2014 was
15 the next time you spoke with Vladimir, right?
16 A. Right.
17 Q. How did you next speak with Vladimir?
18 A. I don't remember whether he sent me a
19 text message or called to arrange to meet with
20 me. And we met. I offered a restaurant, or
21 suggested a restaurant, on Pushkin Square, and
22 he suggested a different restaurant, next door.
23 And that's where we met.
24 Q. What was the name of the restaurant
25 that you suggested that you would meet at?

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1 Lurie - Confidential
2 A. The restaurant was called To, T-O, Da,
3 D-A, Seo, S-E-O, which can be translated, this
4 and that.
5 Q. And where did Vladimir request to
6 meet?
7 A. At the restaurant called Mosca,
8 M-O-S-C-A. It's the restaurant which is located
9 several meters away from the previous
10 restaurant. And the reason for that is unknown
11 to me.
12 Q. And I believe it's your testimony you
13 don't recall whether it -- you discussed this
14 meeting via text message, or on a telephone
15 conversation; is that correct?
16 A. Yes. I don't remember exactly now.
17 Q. I would like you to take a look, if
18 you would, at your declaration, it's Exhibit A.
19 Is there a copy there in front of you?
20 And if you --
21 A. Yes. I was just handed over.
22 Q. And if you could review that, and see
23 if that refreshes your recollection about
24 whether you had a text conversation or phone
25 conversation.

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1 Lurie - Confidential
2 The question I'm going to ask you is,
3 whether review of this document refreshes your
4 recollection as to whether you had a text
5 conversation or a phone conversation.
6 RQ MR. MONTELEONI: Objection.
7 Counsel, I just wanted to state for
8 the record that the document that the
9 witness appears through the video to be
10 looking at is bound in a different way than
11 the document that we got for Exhibit A, and
12 so we would just ask that a copy of the
13 precise document that the witness is
14 looking at be made and transmitted to the
15 court reporter and be put in the record as
16 the exhibit he's looking at.
17 MR. LEVINE: I will represent to you
18 that we delivered a copy of the document
19 known as Exhibit A to -- this is my version
20 of it, my personal version, I have a copy
21 of it right here -- a document known as
22 Exhibit A to counsel in Russia, and how
23 they bound it is up to how it gets bound in
24 Russia.
25 MR. MONTELEONI: I assume the

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<p>1 Lurie - Confidential</p> <p>2 documents are substantially identical, but</p> <p>3 even just looking over the video, it looks</p> <p>4 like there's a different cover page for</p> <p>5 that document.</p> <p>6 And just so the record is complete, we</p> <p>7 would just ask that the actual one that the</p> <p>8 witness is looking at be made part of the</p> <p>9 record.</p> <p>10 MR. LEVINE: We will attempt to</p> <p>11 procure that document from counsel in</p> <p>12 Russia.</p> <p>13 MR. MONTELEONI: Thank you.</p> <p>14 Q. Mr. Lurie, if you could put the</p> <p>15 document down and away from you.</p> <p>16 Does your review of Exhibit A refresh</p> <p>17 your recollection to whether you arranged your</p> <p>18 meeting with Vladimir via phone or via text</p> <p>19 message?</p> <p>20 A. Yes. Most likely it was a phone call.</p> <p>21 Q. Okay. And why did you not record that</p> <p>22 phone call?</p> <p>23 MR. MONTELEONI: Objection.</p> <p>24 A. Because I couldn't. I -- I'm able to</p> <p>25 record conversations only when it's convenient</p>	<p>1 Lurie - Confidential</p> <p>2 Q. Okay. When you met -- when you met</p> <p>3 with Vladimir on or around November 16, 2014, at</p> <p>4 Cafe Mosca, did you do anything to ensure that</p> <p>5 you would be able to recall the conversation</p> <p>6 later on?</p> <p>7 MR. MONTELEONI: Objection.</p> <p>8 A. Yes. I recorded him on my cell phone.</p> <p>9 Q. And how did you go about recording him</p> <p>10 on your cell phone?</p> <p>11 A. By putting my second cell phone next</p> <p>12 to me, I recorded it.</p> <p>13 Q. Where did you store the recording of</p> <p>14 this conversation with Vladimir on November 16,</p> <p>15 2014?</p> <p>16 A. On that same cell phone that I used to</p> <p>17 record it on.</p> <p>18 Q. Have you ever listened to this</p> <p>19 conversation before off of that cell phone?</p> <p>20 A. Yes.</p> <p>21 Q. And is that conversation still</p> <p>22 available on that cell phone today?</p> <p>23 A. Yes.</p> <p>24 Q. Okay.</p> <p>25 MR. LEVINE: I am going to play a</p>
Page 63	Page 65
<p>1 Lurie - Confidential</p> <p>2 for me. But, I might be driving, I might be in</p> <p>3 a car, I might be at the interview, and so, I</p> <p>4 did not record it for technical reasons.</p> <p>5 And, moreover, I was more interested</p> <p>6 in the personal meeting with Vladimir.</p> <p>7 Q. How long was your telephone</p> <p>8 conversation with Vladimir on or around</p> <p>9 November 16, 2014, if you recall?</p> <p>10 A. I don't remember exactly, but since it</p> <p>11 was just to arrange to meet, I assume it took</p> <p>12 about 20 seconds, but I can only assume. I</p> <p>13 don't remember exactly now.</p> <p>14 Q. Did you eventually meet Vladimir as</p> <p>15 you proposed on -- strike that.</p> <p>16 Did you eventually meet Vladimir as</p> <p>17 was proposed during your phone call, on</p> <p>18 November 16, 2014?</p> <p>19 A. Yes.</p> <p>20 Q. And where did you meet him at?</p> <p>21 A. At the Mosca Cafe.</p> <p>22 Q. And when did you -- when did you meet</p> <p>23 him? Which date?</p> <p>24 A. I cannot give you the exact date. On</p> <p>25 the 16th, or the 17th, around that time.</p>	<p>1 Lurie - Confidential</p> <p>2 recording, which we've marked as Exhibit 5</p> <p>3 to Exhibit B. We will play the entire</p> <p>4 thing in full.</p> <p>5 I will ask that the translator not</p> <p>6 translate the conversation subject to any</p> <p>7 objection from the government.</p> <p>8 MR. MONTELEONI: No objection.</p> <p>9 MR. LEVINE: A transcript of that</p> <p>10 recording is available as Exhibit 5 to</p> <p>11 Exhibit A, and a translation thereto is</p> <p>12 also attached as Exhibit 5 to Exhibit A.</p> <p>13 Before I play the recording, I've been</p> <p>14 informed that there is a short amount of</p> <p>15 time left on the tape, so why don't we take</p> <p>16 a short break before I play the recording.</p> <p>17 A five-minute break.</p> <p>18 THE VIDEOGRAPHER: The time is</p> <p>19 2:15 p.m. and we're going off the record.</p> <p>20 (A recess was taken.)</p> <p>21 THE VIDEOGRAPHER: This begins media</p> <p>22 Unit Number 3. The time is 2:22 p.m. and</p> <p>23 we are back on the record.</p> <p>24 Q. I'm now going to play the recording,</p> <p>25 Exhibit 5 to Exhibit B.</p>

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1 Lurie - Confidential
 2 (Audio clip was played.)
 3 Q. Were you able to hear that, Mr. Lurie?
 4 A. Yes.
 5 Q. Is the recording that we just listened
 6 to, as Exhibit 5 to Exhibit B, identical to the
 7 recording contained on your cell phone of the
 8 conversation you had with Vladimir on or around
 9 November 16, 2014?
 10 MR. MONTELEONI: Objection.
 11 A. Yes, absolutely.
 12 Q. Can you identify the voices on the
 13 recording of your phone conversation -- excuse
 14 me, strike that.
 15 Can you identify the voices on the
 16 recording of your conversation with Vladimir
 17 that you took on or around November 16, 2014?
 18 MR. MONTELEONI: Objection.
 19 A. Yes, I can. One voice is mine. The
 20 second voice belongs to Vladimir. Or the person
 21 who identified himself as Vladimir and with whom
 22 I met.
 23 Q. Can you identify the voices of the
 24 people we just listened to in Exhibit 5 to
 25 Exhibit B?

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1 Lurie - Confidential
 2 A. Yes.
 3 Q. Who are they?
 4 A. One voice belongs to me, the other
 5 voice belongs to the person who introduced
 6 himself as Vladimir and with whom I met.
 7 MR. LEVINE: I'm going to play a short
 8 portion from the beginning of Exhibit 5 to
 9 Exhibit B, which was the recording of your
 10 conversation with Vladimir on or around
 11 November 16, 2014. And then after I play
 12 it, I'll ask you a few questions about it.
 13 (Audio clip was played.)
 14 Q. The first voice that you heard on the
 15 recording, whose voice was that?
 16 A. Could you play it again, please?
 17 Q. Sure.
 18 (Audio clip was played.)
 19 A. The first voice belongs to Vladimir.
 20 The second voice belongs to me.
 21 Q. Yours would be the deeper voice that
 22 we heard on the recording?
 23 A. Yes.
 24 Yes, yes.
 25 Q. After this meeting on November 16,

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1 Lurie - Confidential
 2 2014, did you ever speak to Vladimir again?
 3 A. No.
 4 Q. Have you ever spoken to Maxim since
 5 your last phone conversation on or around, I
 6 believe it was November 4, 2014?
 7 MR. MONTELEONI: Objection.
 8 A. No, no. I have not spoken.
 9 Q. Did you ever come to learn who
 10 Vladimir was?
 11 A. No.
 12 Q. Did you ever come to learn who Maxim
 13 was?
 14 A. No.
 15 Q. In your --
 16 A. I do not have any additional
 17 information on these people.
 18 Q. In your final conversation with
 19 Vladimir on November 16, 2014, what were the
 20 important details that were discussed in that
 21 conversation to you?
 22 A. In my opinion, the most important
 23 detail was that he threatened me, or attempted
 24 to threaten me, on behalf of William Browder.
 25 He bragged about Browder's power and ability and

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1 Lurie - Confidential
 2 influence in U.S. and European courts, and he
 3 told me that I would not be able to travel
 4 abroad.
 5 So he threatened me or hinted that --
 6 the threats, hinted on the threats.
 7 Q. Did you accept Vladimir's offer to
 8 change your story regarding Magnitsky for
 9 payment?
 10 MR. MONTELEONI: Objection.
 11 A. No. Of course not.
 12 Q. Earlier you testified that you met
 13 Sergei Magnitsky while you were in prison.
 14 Can you explain why you were in
 15 prison?
 16 A. Yes, I can explain.
 17 Q. Please do so.
 18 A. A criminal case was opened against me.
 19 The case was fabricated by the investigator, in
 20 my opinion, and I was accused of fraud and
 21 extortion, and I was held at Butyrka prison,
 22 pretrial detention facility for a long period of
 23 time.
 24 Q. Were you ultimately convicted of any
 25 crimes?

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1 Lurie - Confidential
 2 A. Yes. I was convicted.
 3 Q. Of what?
 4 A. Of fraud and extortion.
 5 Q. What -- how much time were you
 6 sentenced to originally?
 7 MR. MONTELEONI: Objection.
 8 A. To eight years of strict regime.
 9 Q. Did you appeal the sentence?
 10 A. Yes.
 11 Q. Did you appeal the conviction?
 12 A. Yes.
 13 Q. As a result of the appeal, what
 14 happened?
 15 A. As a result of my appeal, the Moscow
 16 city court changed the conviction and went below
 17 minimum, changing it to four years of
 18 imprisonment.
 19 Q. Were you ever accused of committing
 20 any other crimes after you were placed in
 21 prison?
 22 A. Yes.
 23 Q. What?
 24 A. After I was already in prison, I
 25 published through the Internet an open letter

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1 Lurie - Confidential
 2 where I accused the investigator of fabricating
 3 the case against me, and I was confused of
 4 slander against the investigator.
 5 Q. That would have been you were accusing
 6 the investigator of your first criminal case, of
 7 fabricating the case against you; is that right?
 8 A. Yes. Yes.
 9 Q. And your first case, who were you
 10 accused of committing a crime against?
 11 A. Against then member of the council of
 12 the federation, and the senator, last name
 13 Slutsker, and his wife.
 14 It's S-L-U-T-S-K-E-R.
 15 Q. In your second trial for slander, what
 16 happened?
 17 MR. MONTELEONI: Objection.
 18 A. There was a unanimous non-guilty
 19 verdict returned by the jury.
 20 Unanimous.
 21 Q. And how long did it take the jury to
 22 reach that unanimous verdict?
 23 A. Three hours.
 24 Q. And so therefore, you were found not
 25 guilty by the jury, of slandering the prosecutor

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1 Lurie - Confidential
 2 for bringing a fabricated case against you in
 3 the first criminal trial. Correct?
 4 MR. MONTELEONI: Objection.
 5 A. Yes. Yes.
 6 Q. As a result of this verdict, what
 7 happened to your sentence of your original
 8 conviction?
 9 MR. MONTELEONI: Objection.
 10 A. I continued to serve time, and was
 11 released one month earlier, so I had to continue
 12 to serve time.
 13 Q. Were the -- were you given an apology
 14 by anyone in relation to your first sentence?
 15 MR. MONTELEONI: Objection.
 16 A. For the first case, no. But for the
 17 second case, yes. I was given an apology from
 18 the Russian prosecutor's office.
 19 Q. Was that a private apology or a public
 20 apology?
 21 A. It was an official public apology done
 22 in court, in front of the jury and the judges,
 23 from the name of the procure general of Russian.
 24 Q. What happened to the investigator from
 25 your first criminal case?

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1 Lurie - Confidential
 2 MR. MONTELEONI: Objection.
 3 A. He was laid off right after that court
 4 hearing, as the person who failed certification,
 5 is the person who failed to meet professional
 6 obligations.
 7 Q. The second criminal trial that you
 8 had, where you were accused of slander, in your
 9 opinion, what does that demonstrate with respect
 10 to the first conviction that was entered against
 11 you?
 12 MR. MONTELEONI: Objection.
 13 A. It demonstrated, in my opinion, that
 14 the first case was fabricated by the
 15 investigator who worked on the case, and the
 16 second not-guilty verdict demonstrated the
 17 justice of the court.
 18 So the court acted in accordance with
 19 principles of justice.
 20 Q. I'm going to ask you to take a look
 21 again at Exhibit A, which is your declaration,
 22 and the transcriptions and translations of the
 23 recordings attached thereto.
 24 And if you could turn to page 18 of
 25 the Russian-language version, for the record,

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1 Lurie - Confidential
 2 that is Document 249 filed in our court
 3 proceeding, page 36 of 36.
 4 Are you there?
 5 A. Page 18? Yes, I found it.
 6 Q. Whose signature is that on that page?
 7 A. Mine.
 8 Q. Have you ever met previously Nataliya
 9 Veselnitskaya?
 10 A. Yes.
 11 Q. When was the first time that you met
 12 her?
 13 A. I don't remember the exact date, but I
 14 can base my answer on the circumstances related
 15 to that.
 16 Q. And approximately when, then, do you
 17 recall first meeting her based on the
 18 circumstances related to that?
 19 A. It was sometime -- I think, it was
 20 sometime around the fall of 2014.
 21 Q. What, if anything, did you discuss
 22 with her concerning the version of events that
 23 you just testified about today?
 24 MR. MONTELEONI: Counsel, I would just
 25 ask that if -- unless the witness is being

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1 Lurie - Confidential
 2 directed to one particular portion of the
 3 affidavit that it be taken out of his field
 4 of view. I couldn't tell if he was looking
 5 at it.
 6 MR. LEVINE: That's fine.
 7 Q. Mr. Lurie, could you put the
 8 declaration, Exhibit A, aside, please.
 9 Okay. So, what, if anything, did you
 10 discuss with Nataliya Veselnitskaya concerning
 11 the version of events that you just testified
 12 about today, when you first met her?
 13 A. She called me after I was in a radio
 14 or commented during the documentary, called
 15 "Sherlock Holmes Investigates Sergei Magnitsky's
 16 Death," Letter B.
 17 I spoke about William Browder, and
 18 Sergei Magnitsky, in that film, and also after
 19 my participation at a radio program on Vesti FM,
 20 and where I spoke about my meetings with Sergei
 21 Magnitsky.
 22 So she called me and we met and I told
 23 her about these events.
 24 Q. Have you had any other conversations
 25 with Ms. Veselnitskaya regarding the events

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1 Lurie - Confidential
 2 you've testified about here today?
 3 A. Yes. After all those events, I told
 4 her about them, as an attorney.
 5 Also, prior to that, she commented on
 6 the events in two large articles I published
 7 regarding William Browder, Sergei Magnitsky, and
 8 people close to William Browder.
 9 And she, as a defense attorney,
 10 commented there, there are two articles that are
 11 available on the Internet, and in these
 12 articles, there are commentaries by Nataliya
 13 Veselnitskaya. I, as a journalist, asked her to
 14 do that.
 15 Q. Approximately how many times have you
 16 met with Ms. Veselnitskaya?
 17 A. I cannot tell you exactly.
 18 Three, five.
 19 Q. Have you ever met with any --
 20 A. Eight.
 21 Q. Have you ever met with any of the
 22 American lawyers regarding your -- the version
 23 of events you've testified about here today?
 24 MR. MONTELEONI: Objection to form.
 25 A. Yes.

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1 Lurie - Confidential
 2 Q. And do you recall which attorneys?
 3 A. Well, yes. Yes.
 4 Q. Which ones?
 5 A. Attorney with the last name Moscow,
 6 and with you.
 7 Q. And what did you discuss with those
 8 attorneys in -- strike that.
 9 What did you discuss with Mr. Moscow?
 10 A. I told him everything that happened to
 11 me in prison, and how I met Sergei Magnitsky
 12 there.
 13 And I also told him about the events
 14 regarding how people tried to buy me on behalf
 15 of William Browder.
 16 Q. And what did you discuss with me?
 17 A. I told you the same, that I mentioned
 18 in my previous response.
 19 Q. Has any attorney you've met with
 20 concerning your -- the events you've testified
 21 about here today, ever offered you anything of
 22 value in exchange for signing your declaration?
 23 A. No.
 24 Q. Has anyone ever offered you anything
 25 of value in exchange for signing your

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1 Lurie - Confidential
 2 declaration?
 3 A. No.
 4 Q. Has anyone ever offered you anything
 5 of value in exchange for your testimony?
 6 A. No.
 7 Q. Exhibit A, your declaration, who
 8 drafted that document?
 9 A. It was drafted by me.
 10 Q. Did you have any assistance with
 11 drafting it?
 12 A. In drafting? No. Only in translation
 13 and transcription, because my command of English
 14 is not on par.
 15 Q. Has any representative in the United
 16 States Government ever contacted you prior to
 17 today to discuss the version of events that
 18 you've testified about and you've outlined in
 19 your declaration?
 20 A. No.
 21 MR. LEVINE: Okay. I'm going to take
 22 a break, and we'll come back.
 23 THE VIDEOGRAPHER: The time is
 24 3:04 p.m. and we're going off the record.
 25 (A recess was taken.)

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1 Lurie - Confidential
 2 THE VIDEOGRAPHER: The time is
 3 3:24 p.m. and we are back on the record.
 4 Q. I just have a few more questions for
 5 you, Mr. Lurie.
 6 When was the last time you spoke to an
 7 American attorney, prior to today, regarding
 8 your testimony here today?
 9 A. I don't remember.
 10 Q. Okay.
 11 MR. LEVINE: I pass the witness.
 12 MS. GRAHAM: Should we switch sides
 13 for the convenience of the court reporter?
 14 I think, probably.
 15 MR. LEVINE: Yes. Before we do that,
 16 are you going to be doing the questioning,
 17 Ms. Graham?
 18 MS. GRAHAM: Correct.
 19 MR. LEVINE: I renew my objection,
 20 there's no point in arguing about it, but I
 21 renew it.
 22 MS. GRAHAM: You're not going to
 23 withdraw it given the explanation given?
 24 MR. LEVINE: No.
 25 MS. GRAHAM: Let's go off the record

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1 Lurie - Confidential
 2 briefly.
 3 THE VIDEOGRAPHER: The time is
 4 3:25 p.m. and we're going off the record.
 5 (Discussion off the record.)
 6 THE VIDEOGRAPHER: Time is 3:27 p.m.
 7 and we are back on the record.
 8 EXAMINATION BY MS. GRAHAM:
 9 Q. Good afternoon, Mr. Lurie. Or good
 10 evening. Good evening in Russia, I suppose.
 11 A. Approaching to midnight.
 12 Q. Okay. Mr. Lurie, you said that you
 13 began your career as a journalist in 1980.
 14 Correct?
 15 A. Yes.
 16 Q. Was there any training that you
 17 received to become a journalist?
 18 A. Yes. I studied at the Department of
 19 Philology and I have many years of experience.
 20 Q. Is there any journalists association,
 21 in Russia, that you are a part of?
 22 A. Yes. I am a member of the Union of
 23 Journalists of Russia.
 24 Q. What does that mean, to be "a member
 25 of the Union of Journalists of Russia"?

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1 Lurie - Confidential
 2 A. Well, it's not an official
 3 organization. And I would say that almost all
 4 journalists of Russia are members of that
 5 organization.
 6 Q. I see.
 7 Is there a set of professional rules
 8 that journalists in Russia are required to
 9 follow?
 10 MR. LEVINE: Objection.
 11 A. No. There is none. As far as I know,
 12 there is none. There is the law on media, it's
 13 a federal law.
 14 Q. Who was your first employer as a
 15 journalist?
 16 A. My first employer was Krasnoe,
 17 K-R-S -- K-R-A-S-N-O-E, Znamya, Z-N-A-M-Y-A,
 18 newspaper. Can be translated as "Red Banner."
 19 It's a Kharkov newspaper, where I worked on the
 20 contract, after I graduated from high school.
 21 Q. How long did you work for that
 22 newspaper?
 23 A. For about one year. Yes, one years.
 24 Q. Full time or part time?
 25 A. On a contract basis. I wrote for that

<p style="text-align: right;">Page 82</p> <p>1 Lurie - Confidential</p> <p>2 newspaper, and received payments for my</p> <p>3 articles. I was only 18 years old then.</p> <p>4 Q. How much were you paid per article?</p> <p>5 A. I can't tell you.</p> <p>6 I can't tell you now. It was 35 years</p> <p>7 ago and it was in Soviet rubles, that no longer</p> <p>8 exist, but it was enough to buy ice cream.</p> <p>9 Q. All right. Let's skip ahead a little</p> <p>10 bit. Let's perhaps skip ahead to 2000.</p> <p>11 Who were you working for then?</p> <p>12 A. I worked at the publishing house</p> <p>13 called Sovershenno Sekretno. Secret no. Can be</p> <p>14 translated as "Top Secret." And Versiya</p> <p>15 newspaper, Version.</p> <p>16 So Sovershenno Sekretno newspaper, and</p> <p>17 Version newspaper.</p> <p>18 Q. What was your position at Top Secret</p> <p>19 newspaper?</p> <p>20 A. Special correspondent. And later, I</p> <p>21 headed the Department of Investigations.</p> <p>22 Q. From what time to what time were you a</p> <p>23 special correspondent for Top Secret?</p> <p>24 A. I don't remember exactly now, but I</p> <p>25 believe 1999 to 2000.</p>	<p style="text-align: right;">Page 84</p> <p>1 Lurie - Confidential</p> <p>2 also gave you an approximate number.</p> <p>3 Q. So how much, approximately, were you</p> <p>4 paid per article?</p> <p>5 A. I'll say it again. I cannot tell you</p> <p>6 now, because it kept changing all the time, and</p> <p>7 I cannot tell you now.</p> <p>8 Q. Well, you don't have to answer in</p> <p>9 dollars, you're free to answer in rubles and</p> <p>10 then the changing exchange rate won't be an</p> <p>11 issue.</p> <p>12 A. Let me repeat that I don't know,</p> <p>13 because it was post crisis, and the salaries and</p> <p>14 royalties were changing all the time, and not</p> <p>15 every day, but every hour.</p> <p>16 And if we remember, in August of 1998,</p> <p>17 Russia defaulted on its obligations to its</p> <p>18 citizens.</p> <p>19 Q. How much of your income at that time</p> <p>20 came from these article bonuses versus your</p> <p>21 fixed salary?</p> <p>22 MR. LEVINE: Objection. When you say</p> <p>23 "at that time," do you mean in 2000?</p> <p>24 MS. GRAHAM: I mean, the period when</p> <p>25 he was working as a special correspondent</p>
<p style="text-align: right;">Page 83</p> <p>1 Lurie - Confidential</p> <p>2 Q. What were you paid during that time?</p> <p>3 A. It's difficult for me to answer.</p> <p>4 Q. Why?</p> <p>5 A. Well, it's -- as a rule, we do not</p> <p>6 discuss salary and wages, but you could say that</p> <p>7 it was very good pay, and it was official, I</p> <p>8 received it at the cashier of our newspaper and</p> <p>9 I paid taxes.</p> <p>10 Q. Mr. Lurie, how much were you paid by</p> <p>11 Top Secret as a special correspondent during</p> <p>12 this time?</p> <p>13 A. I don't remember exactly, but if we</p> <p>14 converted, that would be about 1,000 U.S.</p> <p>15 dollars, maybe more. And in addition, I</p> <p>16 received extra payments for the articles.</p> <p>17 Q. 1,000 U.S. dollars per month?</p> <p>18 A. Or maybe less.</p> <p>19 Q. How much did you receive for each</p> <p>20 article that you wrote?</p> <p>21 A. I cannot tell you exactly, because the</p> <p>22 royalty table was constantly changing. It was</p> <p>23 post crisis, and the exchange rate was changing</p> <p>24 all the time.</p> <p>25 And answering the previous question, I</p>	<p style="text-align: right;">Page 85</p> <p>1 Lurie - Confidential</p> <p>2 for Top Secret from 1999 to 2000.</p> <p>3 MR. LEVINE: So approximately 15 years</p> <p>4 ago, right?</p> <p>5 A. Yes. It was 15 years ago, indeed, and</p> <p>6 I don't remember these details.</p> <p>7 Q. For how long did you head the</p> <p>8 Department of Investigation for Top Secret?</p> <p>9 A. I should check my personal labor</p> <p>10 records. I don't remember exactly.</p> <p>11 Q. Approximately.</p> <p>12 A. Maybe six months, maybe one year. Oh,</p> <p>13 I remember. Okay. Let me correct you. I</p> <p>14 headed the Department of Investigation, at</p> <p>15 Versiya newspaper, not at Sovershenno Sekretno.</p> <p>16 That was a subsidiary newspaper that was founded</p> <p>17 by a number of people, including me.</p> <p>18 Q. Thank you for that correction.</p> <p>19 When was that, approximately?</p> <p>20 A. 2000, 2001.</p> <p>21 Q. And approximately how much were you</p> <p>22 paid at Version?</p> <p>23 A. I don't remember. I remember that was</p> <p>24 not a lot. Because it was a new newspaper, it</p> <p>25 was just founded.</p>

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1 Lurie - Confidential
2 Q. Did you have a salary there, or were
3 you paid per article, or some combination?
4 A. There was a combination. And in
5 addition to that, I worked for other
6 publications.
7 Q. Did those other publications pay you
8 per article?
9 A. Yes.
10 Q. Where did you work next after Version?
11 A. I worked at this newspaper called
12 Novaya Newspaper, or New newspaper.
13 Q. What did you do there?
14 A. Special correspondent. Department of
15 Investigations.
16 Q. How long did you work there?
17 A. I worked there full time for about one
18 year, but prior to that and after that, I worked
19 with them as a freelancer.
20 Q. How much did they pay you when you
21 worked there full time?
22 A. I cannot tell exactly in dollars, and
23 I don't remember the exchange rate, but I would
24 say \$500, maybe less, maybe more. Plus
25 royalties.

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1 Lurie - Confidential
2 Q. That's \$500 per month?
3 A. Yes.
4 Q. Where did you work after that?
5 A. After that, I return to Versiya
6 Newspaper, where I worked either six month or
7 one year, I don't remember.
8 Q. Why did you leave Novaya Gazeta?
9 A. Okay. Because I didn't like the
10 editorial position. I did not agree with it.
11 And I didn't like the low salary.
12 Q. What about that editorial position
13 didn't you like?
14 A. In my opinion, that newspaper had
15 somewhat one-sided view of the political events
16 and domestic issues.
17 Q. What do you mean?
18 A. In my opinion, a newspaper should take
19 a global view, not a narrow or one-sided view of
20 political, domestic, or international events. A
21 newspaper should not always criticize or always
22 praise, it should have a neutral and unbiased
23 position.
24 Q. You said you went back to Version
25 newspaper. What was your salary while you were

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1 Lurie - Confidential
2 there?
3 A. Okay. I don't remember exactly now,
4 but it was definitely higher than at my previous
5 place of employment. Plus, I had an opportunity
6 to write more.
7 Q. And when you write more, that means
8 more royalties, correct?
9 A. Yes, of course.
10 Q. Where did you work after Version?
11 A. After Versiya newspaper, I founded my
12 own publication. It was a magazine, a thick
13 magazine of political and investigating nature.
14 It was called, Vslukh. It's V-S-L-U-K-H, which
15 is translated as "Out Loud."
16 Q. When did you found Vslukh magazine?
17 A. I don't remember exactly, but I think
18 in 2003, if memory serves me right.
19 Q. And for how long did you work at
20 Vslukh?
21 A. For almost a year and a half, I was
22 its chief editor, and the co-founder.
23 Q. And what was your salary there?
24 A. About 30,000 rubles, and we need to
25 check the exchange rate on that day.

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1 Lurie - Confidential
2 Q. That's fine. 30,000 rubles per month?
3 A. Yes, of course. Plus royalties.
4 Q. Where did you work after that?
5 A. After that, I founded another
6 publication, called VVP, which is the Russian
7 abbreviation for GDP.
8 Q. Why did you leave Vslukh?
9 A. Because the magazine went bankrupt.
10 Q. How long did you work at VVP?
11 A. One year. At least one year.
12 Q. And how much did you make there?
13 A. Well, don't forget that I was the
14 owner of that magazine.
15 Q. Of course. What was your income from
16 VVP?
17 A. The income grew constantly, and the
18 income was good. There were month that I would
19 make 70- to 100,000 rubles per month.
20 Q. And in bad months, how would you --
21 how much would you make?
22 A. Zero.
23 Q. I'm sorry to hear that.
24 Where did you work after that?
25 A. After that, I sold the VVP magazine,

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1 Lurie - Confidential
2 and it is still published to this day in Moscow,
3 and I use that money to found another
4 publication, about youth culture, called Jeans.
5 Q. Okay. How much did you sell VVP for?
6 A. I don't want to give a number.
7 It can be checked by reports.
8 Q. So it's public information?
9 A. I don't know.
10 Q. Mr. Lurie, I'll ask you again, how
11 much did you sell VVP for?
12 A. I don't want to answer this question,
13 because I believe that the prosecution can send
14 an official request to Moscow to tax authorities
15 and they will provide an official response.
16 Q. Mr. Lurie, I remind you that you are
17 under oath and will ask you the question again.
18 How much did you sell VVP for?
19 A. Meaning, I have to answer your
20 question?
21 Q. Yes, Mr. Lurie.
22 A. Okay. 100,000 U.S. dollars.
23 Q. Thank you, Mr. Lurie.
24 How long did you work at Jeans?
25 MR. LEVINE: Ms. Graham --

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1 Lurie - Confidential
2 MS. GRAHAM: Yes.
3 MR. LEVINE: -- can we take a short
4 break so I can use the restroom? I
5 apologize for interrupting your
6 examination.
7 MS. GRAHAM: Yes. Defense counsel has
8 requested a short break. We'll be back in
9 a few minutes.
10 THE VIDEOGRAPHER: The time is
11 3:57 p.m. and we're going off the record.
12 (A recess was taken.)
13 THE VIDEOGRAPHER: This begins Media
14 Unit Number 4. The time is 4:20 p.m. and
15 we're back on the record.
16 MS. GRAHAM: I'm confirming what we
17 stated during the break, which is that we
18 are breaking for the evening, and we will
19 be resuming the Government's deposition of
20 Mr. Lurie tomorrow at 9:30 a.m., Eastern
21 Standard Time.
22 Thank you, everyone.
23 MR. LEVINE: Before we go off the
24 record, I would just like to explain why we
25 are breaking for the evening, and that's

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1 Lurie - Confidential
2 because it is currently 11:20 p.m. in
3 Moscow, which is where Mr. Lurie is
4 attending the deposition, and it's fairly
5 late, and he's requested that we break for
6 the evening. Thank you.
7 THE VIDEOGRAPHER: The time is
8 4:22 p.m. and we're going off the record.
9 (Time noted: 4:22 p.m.)
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1
2
3 A C K N O W L E D G E M E N T
4 S T A T E O F N E W Y O R K)
5) S s.:
6 C O U N T Y O F N E W Y O R K)
7
8 I, OLEG A. LURIE, hereby certify, I have read
9 the transcript of my testimony taken under oath in
10 my deposition of October 8, 2015; that the
11 transcript is a true, complete and correct record
12 of what was asked, answered and said during this
13 deposition, and that the answers on the record as
14 given by me are true and correct.
15
16
17 _____
18 OLEG A. LURIE
19 Subscribed and sworn to
20 before me on this ____ day
21 of _____, 2015
22
23 _____
24 NOTARY PUBLIC
25

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1
2
3
4 C E R T I F I C A T E
5
6 STATE OF NEW YORK)
7) Ss.:
8 COUNTY OF NEW YORK)
9
10 I JEFFREY BENZ, a Certified Realtime
11 Reporter, Registered Merit Reporter and Notary
12 Public within and for the State of New York, do
13 hereby certify:
14 That the witness whose examination is
15 hereinbefore set forth was duly sworn by me and
16 that this transcript of such examination is a true
17 record of the testimony given by such witness.
18 I further certify that I am not related to
19 any of the parties to this action by blood or
20 marriage and that I am in no way interested in the
21 outcome of this matter.
22 IN WITNESS WHEREOF, I have hereunto set my
23 hand this _____ of _____, 2015.
24 _____
25 _____

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1 JEFFREY BENZ, CRR, RMR
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4
5 I N D E X
6 OLEG A. LURIE
7 Examination by: Page
8 MR. LEVINE 6
9 MS. GRAHAM 80
10
11
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13 Number Description Page
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15 translation of the Russian
16 language declaration
17 signed by Mr. Lurie, with
18 attachments
19 Exhibit B CD with five recordings 37
20 designated as Exhibits 1
21 through 5
22 *****
23 DOCUMENTS AND/OR INFORMATION REQUESTED
24 Page 61
25

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- CONFIDENTIAL -

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF	:	
AMERICA,	:	
	:	
Plaintiff,	:	
	:	CONT'D DEPOSITION
vs.	:	OF:
	:	
PREVEZON HOLDINGS,	:	OLEG A. LURIE
LTD., INVESTMENTS	:	
LTD., KOLEVINS LTD.,	:	
et al.,	:	
	:	
Defendants.	:	

- - - - -

TRANSCRIPT of the stenographic notes
of the proceedings in the above-entitled
matter, as taken by and before
CAROLYN CHEVANCE, a Shorthand Reporter, and
Notary Public of the State of New Jersey, held
at the office of BAKER HOSTETLER, 45
Rockefeller Plaza, New York, New York, on
October 9, 2015, commencing at 9:42 a.m.

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1
2 APPEARANCES:
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14 BY: PAUL M. LEVINE, ESQ.
15 LOURA L. ALAVERDI, ESQ. (Remote participant)
16 NICHOLAS M. ROSE, ESQ. (Remote participant)
17 ALSO PRESENT:
18
19 JOSE RIVERA, Videographer
20 KONSTANTIN GARNOV, Russian Interpreter
21 NATALIYA VESELNITSKAYA, (Remote participant)
22 EKATERINA MARTYSHINA, (Baker Botts - Remote participant)
23
24
25

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1 OLEG A. LURIE
2 THE VIDEOGRAPHER: The time is
3 9:42 a.m. October 9, 2015. This is
4 media number one, volume two, in the
5 continuing deposition of Oleg Lurie.
6 MS. GRAHAM: I would just remind
7 the witness and the interpreter that
8 they are still under oath from
9 yesterday's proceeding.
10 Did you want to put something on
11 the record?
12 MR. LEVINE: It is my
13 understanding that the attorney from
14 Baker Botts yesterday, Izabella
15 Sarkisyan is not there today, and that
16 another attorney from Baker Botts,
17 Ekaterini Martyshina, is now present.
18
19 EXAMINATION BY MS. GRAHAM:
20
21 Q Good afternoon, Mr. Lurie. We
22 are going to be continuing the deposition
23 today.
24 I will be asking you a series of
25 questions. Please let me know if there are

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1 OLEG A. LURIE
2 any questions that you don't understand,
3 otherwise I will assume you understand all of
4 the questions that I'm asking.
5 A Good morning, and I'm ready to
6 proceed.
7 Q Let us know if you need any
8 breaks at any point.
9 A Thank you.
10 Q So I would like to finish up
11 where we left off yesterday, with your
12 employment history and then move on to your
13 testimony about discussions with Sergei
14 Magnitsky.
15 You said you sold VVP, what year
16 was that?
17 A If I'm not mistaken, it was in
18 2004 or in the beginning of 2005.
19 Q How long did you work at Jeans
20 Magazine?
21 A A year-and-a-half.
22 Q What did you do after that?
23 A After that I worked as a
24 freelancer for various publications. Yes, a
25 freelancer for various publications for about

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1 OLEG A. LURIE
 2 a year, year-and-a-half.
 3 Q When you were at Jeans how much
 4 were you earning?
 5 A Approximately, in U.S. dollars,
 6 that was about \$1,000 to \$2,000 per month, for
 7 Russia was a good pay.
 8 Q I see. Why did you leave Jeans?
 9 A Unfortunately, although it was a
 10 good publication, the demand was not that good
 11 and we had to close it down.
 12 Q When you were a freelancer,
 13 approximately, how much were you earning per
 14 month?
 15 A About the same amount, \$1,000 to
 16 \$2,000 U.S. dollars per month. Sometimes
 17 more.
 18 Q When did you stop freelancing?
 19 A I worked as a freelancer until
 20 the end of 2007, and at the same time I
 21 combined it with working as the head of a
 22 section at VTV TV station.
 23 Q How long were you working at VTV
 24 TV station?
 25 A Until January 26, 2008.

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1 OLEG A. LURIE
 2 Q How much were you making as the
 3 head of the section of VTV TV station?
 4 A At least \$1,000 U.S. per month.
 5 Maybe sometimes \$2,000.
 6 Q Thank you.
 7 Is it fair to say that you ended
 8 this employment due to your arrest in January
 9 2008.
 10 A Yes.
 11 Q After your release in December
 12 2011, where did you work?
 13 A After my release in December of
 14 2011, I have been working as an independent
 15 journalist or a freelancer for a number of
 16 publications. I get royalties for my
 17 publications.
 18 Q I see.
 19 So just to be clear, you have not
 20 held a permanent job from December 2011 to the
 21 present, rather you have been working as a
 22 freelancer getting paid per article?
 23 MR. LEVINE: Object to form.
 24 MS. GRAHAM: Withdrawn.
 25 Q To be clear, you have not held a

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1 OLEG A. LURIE
 2 permanent position from December 2011 to the
 3 present, correct?
 4 MR. LEVINE: Ms. Graham, let the
 5 interpret the question.
 6 Q So you have not held a permanent
 7 position from December 2011 to the present,
 8 correct?
 9 MR. LEVINE: Object to form.
 10 A It is not exactly clear to me
 11 what permanent place of employment means.
 12 If I work for 8 -- 7 or 8
 13 publications, doesn't that mean that it is
 14 permanent?
 15 Q Certainly. By permanent I
 16 meant -- perhaps I should have said, you have
 17 not held a position with a fixed monthly
 18 salary since 2011, correct?
 19 A Yes, that is correct.
 20 Q Thank you for that clarification.
 21 So your income comes from --
 22 your income comes from royalties, which come
 23 from the articles that you write, correct?
 24 MR. LEVINE: Object to the form.
 25 A Yes, that is absolutely correct.

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1 OLEG A. LURIE
 2 Q How much are you generally paid
 3 per article?
 4 A It depends on the publication.
 5 And in addition to writing articles, I also
 6 participate in radio programs, TV programs and
 7 on the Internet.
 8 Q Are you paid for appearing on
 9 radio programs?
 10 A Yes.
 11 Q How much are you paid, generally,
 12 per program?
 13 MR. LEVINE: Object to the form.
 14 A Depends on the program and its
 15 duration.
 16 Q What is the most you have been
 17 paid from 2011 for participating in a radio
 18 program?
 19 MR. LEVINE: Object to the form.
 20 A To be honest, I don't remember
 21 right now. I usually receive a lump sum, so I
 22 don't remember.
 23 Q Is it \$100 U.S. for radio
 24 programs, \$500, \$1,000?
 25 A Once again, I would like to say

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1 OLEG A. LURIE
 2 that I do not remember any exact amount for a
 3 particular program.
 4 Q So you have no sense of how much
 5 money you make from appearing on a radio
 6 program?
 7 A I can give you an approximate
 8 number, it could be \$100, it could be \$500, it
 9 could be \$300. Approximately, \$100, \$200,
 10 \$500, \$350.
 11 Q That is \$100 to \$500,
 12 approximately?
 13 A From \$100 to \$500. It can be
 14 \$100, it can be \$500. Of course I receive it
 15 in Russian Rubles, and I convert it using the
 16 official exchange rate of the Bank of Russia.
 17 Q So that is \$100 to \$500 per radio
 18 program, to be clear?
 19 MR. LEVINE: Object to the form.
 20 A For work in a major, one-hour
 21 long radio program.
 22 Q Are you paid for your
 23 participation in TV programs?
 24 A For some TV programs, yes, for
 25 others, no.

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1 OLEG A. LURIE
 2 Q The TV programs that are paid,
 3 could you approximate how much you receive per
 4 program?
 5 A Can I give you an example?
 6 Q Sure.
 7 A For example, for participating in
 8 documentary and providing comments during
 9 those documentaries, we broadcast it in Russia
 10 and I get paid \$100 U.S. per hour.
 11 Q Are you paid for your work on the
 12 Internet?
 13 A As we all know, there are blogs
 14 in the Internet, on the Internet and there are
 15 official portals, media portals.
 16 I get paid royalties for
 17 publications in official media. As for blogs,
 18 personal web pages, my personal website,
 19 Facebook, Twitter, I do not get paid for that.
 20 Q You said you have a personal
 21 blog, do you receive any income from that
 22 blog?
 23 A No.
 24 Q When you write an article for a
 25 major media outlet how much, approximately, do

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1 OLEG A. LURIE
 2 they pay you?
 3 MR. LEVINE: Objection to form.
 4 A It is difficult for me to come up
 5 with an exact answer. Some publications pay
 6 one amount, other less popular publications
 7 pay less.
 8 There are also a number of
 9 publications, whom I sympathize as an author,
 10 and I publish my articles there for free.
 11 Q The publications that pay more,
 12 how much do -- have they generally paid for
 13 your articles, and again, this is the period
 14 from 2011 to 2015?
 15 MR. LEVINE: Objection to form.
 16 A A publication can pay from \$100
 17 to \$1,000 U.S. per article. It's royalties.
 18 Royalties get paid and it depends
 19 on the quality of the material and depends how
 20 sensational it is.
 21 Q What do you mean it depends on
 22 how sensational it is?
 23 A I will give you an example. May
 24 I give you an example?
 25 Q Yes, please.

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1 OLEG A. LURIE
 2 A For example, as an investigative
 3 journalist, I find information about prominent
 4 government employee or Politician who, for
 5 example, embezzled state funds and I publish
 6 this information, accompanied with documents I
 7 found and, for example, this article is read
 8 by 10 million people. It's a sensation.
 9 And as a result of my
 10 publication, that employee, government
 11 employee has to leave.
 12 Q What does that mean in terms of
 13 your royalties?
 14 A So if this article turns out to
 15 be popular and is read by many people, I can
 16 receive royalties, \$500, \$700, \$800 U.S., but
 17 I would like to emphasize that my interest is
 18 not to get dollars or Rubles; I'm more
 19 interested in bringing to light corruption.
 20 Q I want to make sure I understand
 21 the payment system for articles. Do you
 22 receive any money before the article is
 23 published in a major news outlet?
 24 A No advance payment of any kind.
 25 Never.

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1 OLEG A. LURIE
 2 Q I see.
 3 So the only payments are after
 4 the article has been published, correct?
 5 A Yes, and only by the publication
 6 which published my article.
 7 Q What are those payments based on?
 8 MR. LEVINE: Object to the form.
 9 A This is not up to me to decide.
 10 The decision is made by the Chief Editor and
 11 the CEO of the publication where my article is
 12 published.
 13 Q Is that decision based in part on
 14 how many people read your article?
 15 MR. LEVINE: Objection.
 16 A I think, yes.
 17 Q Since 2011, what is the most in
 18 royalties you have received for an article?
 19 A I don't remember.
 20 Q Can you give an example of an
 21 article, since 2011, that you remember
 22 receiving a greater average amount of
 23 royalties for?
 24 MR. LEVINE: Object to the form.
 25 A Unfortunately, I don't remember.

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1 OLEG A. LURIE
 2 I'm sorry.
 3 Q Mr. Lurie, do you follow the news
 4 in Russia?
 5 MR. LEVINE: Objection to the
 6 form.
 7 A That's my job.
 8 Q I would like to direct your
 9 attention to Exhibit A from yesterday, the
 10 Affidavit you signed in March 2015.
 11 I apologize, that is February
 12 2015. Is everything in this Affidavit true?
 13 A Are you talking about the
 14 Declaration?
 15 Q Yes.
 16 A Yes, of course.
 17 Q Does it reflect your best
 18 recollection of the events therein at the time
 19 you signed it?
 20 A Yes, my best recollection at the
 21 time of signing of that document.
 22 Q Did you include all of the
 23 relevant facts about the events recounted in
 24 this Declaration?
 25 MR. LEVINE: Object to the form.

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1 OLEG A. LURIE
 2 A Relevant to whom?
 3 Q You stated earlier that you met
 4 Sergei Magnitsky for the first time in a
 5 holding area of Butyrka prison, correct?
 6 A Yes.
 7 Q And you stated that the holding
 8 area has quite a few cells, how many cells are
 9 there in this holding area?
 10 MR. LEVINE: Object to the
 11 characterization of the testimony.
 12 A I don't remember saying that
 13 there are many cells there in the Declaration,
 14 but there are five, six or seven huge cells
 15 that can hold up to 50 people each.
 16 Q How big are these cells -- how
 17 big is each cell, if you could estimate the
 18 size?
 19 A They all have different size.
 20 Q How big is the cell that you met
 21 Mr. Magnitsky in for the first time?
 22 A One minute, please. I'm sorry, I
 23 started to speak in English. They are,
 24 approximately, 50 to 60 square meters, maybe
 25 more. It's dark there. The lighting there is

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1 OLEG A. LURIE
 2 not very good. There is just one bulb.
 3 Q When you first met Mr. Magnitsky,
 4 how many other people were in the cell with
 5 you?
 6 A Average number of people in the
 7 cell is, as a rule, pretty much the same, 20
 8 to 25 people. But people are constantly being
 9 led out of the cell and brought into the cell.
 10 Q Are the cells connected in any
 11 way?
 12 MR. LEVINE: Object to the form.
 13 A By whom and how?
 14 Q Can prisoners move between cells
 15 if they wish to?
 16 MR. LEVINE: Objection to the
 17 form.
 18 A It is completely out of the
 19 question.
 20 Q Are there different cells --
 21 withdrawn.
 22 Did you get any news from the
 23 outside while you were in Butyrka?
 24 MR. LEVINE: Object to form.
 25 A I read a lot of newspapers. I

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<p>1 OLEG A. LURIE</p> <p>2 was subscribed to many, and I watched TV in</p> <p>3 the cell where I was held, the option of</p> <p>4 having an illegal cell phone was completely</p> <p>5 ruled out.</p> <p>6 I also received information from</p> <p>7 my attorney.</p> <p>8 Q You were able to subscribe to</p> <p>9 newspapers while you were in Butyrka?</p> <p>10 A Yes, of course.</p> <p>11 Q Did those come every day?</p> <p>12 A 24-hour delay.</p> <p>13 Q Did you hear about Sergei</p> <p>14 Magnitsky's case while you were in Butyrka?</p> <p>15 MR. LEVINE: Object to the form.</p> <p>16 A No.</p> <p>17 Q Do journalists have access to</p> <p>18 come to Butyrka and interview prisoners?</p> <p>19 A No.</p> <p>20 Q You stated earlier in your</p> <p>21 deposition that you published an open letter</p> <p>22 while you were in prison, when did you do</p> <p>23 that?</p> <p>24 A It happened in -- one moment,</p> <p>25 please.</p>	<p>1 OLEG A. LURIE</p> <p>2 Q Did you publish anything else</p> <p>3 while you were in prison?</p> <p>4 MR. LEVINE: Object to the form.</p> <p>5 A No.</p> <p>6 Q In your Affidavit you describe</p> <p>7 Butyrka as a pretrial detention center, what</p> <p>8 does that mean?</p> <p>9 A It is a pretrial detention</p> <p>10 center, and then Russian, it is a common</p> <p>11 abbreviation, which stands for pretrial</p> <p>12 detention center, meaning that people or</p> <p>13 inmates there are under investigation; they</p> <p>14 have been arrested and accused of committing</p> <p>15 crimes, although sentencing has not taken</p> <p>16 place yet.</p> <p>17 After the sentencing and when all</p> <p>18 the procedures of appeal and cessation of</p> <p>19 appeal are over, the sentenced inmate is then</p> <p>20 sent or transferred within 10 days to a</p> <p>21 prison.</p> <p>22 Q Approximately, how many people</p> <p>23 were in Butyrka when you were there?</p> <p>24 MR. LEVINE: Object to the form.</p> <p>25 A I had no ability to count them,</p>
Page 114	Page 116
<p>1 OLEG A. LURIE</p> <p>2 It was in 2009, in the beginning</p> <p>3 of 2009 or 2008. We need to check the</p> <p>4 Internet. It is still there.</p> <p>5 Q How did you publish that open</p> <p>6 letter?</p> <p>7 A I will not reveal this</p> <p>8 information, because I will let down people</p> <p>9 who assisted me with doing that. Even at the</p> <p>10 jury trial I refuse to reveal this</p> <p>11 information. I had an opportunity to transfer</p> <p>12 that material outside.</p> <p>13 Q Understood. I respect that you</p> <p>14 don't want to discuss details.</p> <p>15 Without going into specifics, is</p> <p>16 it fair to say that you were able to publish</p> <p>17 that with the help of others?</p> <p>18 A Yes, with assistance from others.</p> <p>19 Q Where was that letter published?</p> <p>20 A In Live Journal.</p> <p>21 Q What is Live Journal?</p> <p>22 A It is the largest platform for</p> <p>23 blogs in the United States, or it is a U.S.</p> <p>24 platform where a Russian section also exists</p> <p>25 for publications in the Russian language.</p>	<p>1 OLEG A. LURIE</p> <p>2 but on average, 3,000 to 3,500.</p> <p>3 Q In your experience, how long did</p> <p>4 inmates usually stay at Butyrka?</p> <p>5 A I cannot answer this question,</p> <p>6 because it depends on the investigation.</p> <p>7 I spent in Butyrka prison almost</p> <p>8 two years. There are people who spend only</p> <p>9 two months, and there are people that spend</p> <p>10 five years.</p> <p>11 Q When did you arrive in Butyrka?</p> <p>12 A I was transferred to Butyrka</p> <p>13 prison -- to the pretrial detention center</p> <p>14 from the pretrial detention center number</p> <p>15 five; it is a similar pretrial detention</p> <p>16 center.</p> <p>17 I was transferred there in March</p> <p>18 of 2008, and was held there until August of</p> <p>19 2009. Yes, until the end of August of 2009.</p> <p>20 Q You said earlier that you spoke</p> <p>21 with Sergei Magnitsky on or about August 9,</p> <p>22 2009, had you ever met Magnitsky before?</p> <p>23 A No.</p> <p>24 Q Had you ever seen him?</p> <p>25 A No, and I did not know him.</p>

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1 OLEG A. LURIE
 2 Q You said that you met him in the
 3 holding cells, during your time in Butyrka how
 4 often were you in those holding cells?
 5 A Tens if not hundreds of times. I
 6 think hundreds of times.
 7 Q How many times per week, on
 8 average, were you in the holding cells?
 9 A There were periods where I was in
 10 holding cells twice a day, and there were
 11 periods where I was there once a week or once
 12 every 10 days.
 13 Q In August 2009, how often were
 14 you in the holding cells?
 15 A Often enough. I believe it was
 16 every other day or even every day.
 17 Q Did Sergei Magnitsky tell you his
 18 name the first time you met him?
 19 A He introduced himself as Sergei.
 20 Q Did he say whether he had ever
 21 seen you before?
 22 A He saw me, yes, on TV.
 23 Q You said in your Declaration that
 24 Magnitsky approached you because he needed
 25 advice on how to properly write the text of

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1 OLEG A. LURIE
 2 his complaints, correct?
 3 MR. LEVINE: Counsel, can you
 4 direct him to the paragraph if you are
 5 going to ask him a specific thing in his
 6 Declaration.
 7 Q If you don't remember you are
 8 welcome to look at your Declaration, it is
 9 paragraph 26.
 10 A I remember.
 11 Q And is that correct?
 12 A He asked me whether his
 13 complaints affect -- whether his complaints
 14 create problems for other inmates.
 15 Q Whether they --
 16 A How to do it in the best way so
 17 these complaints would not create problems.
 18 Q Did he say whether he had
 19 previously filed complaints?
 20 A As far as I understood from our
 21 conversation, yes.
 22 Q He stated that he had filed
 23 previous complaints, correct?
 24 A I don't remember exactly, but
 25 that was the conclusion I made based on our

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1 OLEG A. LURIE
 2 conversation back then, and most likely, yes,
 3 most likely.
 4 Q Did Sergei Magnitsky state how
 5 many complaints he had previously filed?
 6 A I don't remember.
 7 Q Did Magnitsky say that he had
 8 previously had problems with complaints that
 9 he had filed?
 10 A Problems with whom? With the
 11 prison administration or with inmates? Can
 12 you please clarify your question?
 13 Q With inmates.
 14 A No, he didn't say that but he was
 15 afraid of that.
 16 Q What types of complaints did he
 17 think might create problems for other inmates?
 18 MR. LEVINE: Objection.
 19 A What kind of complaints?
 20 Complaints that can lead to searches, to
 21 strengthening conditions, or that could affect
 22 living conditions.
 23 Q In your experience, what
 24 complaints could lead to searches,
 25 strengthening conditions or affecting living

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1 OLEG A. LURIE
 2 conditions?
 3 A As I see it, that could be
 4 telling that there are cell phones in cells,
 5 telling about delivery of drugs to cells, both
 6 various conflicts, illegal communication
 7 between cells, all these constitute violation
 8 of prison rules.
 9 Q You stated earlier that Sergei
 10 Magnitsky described an agreement that his
 11 protectors had struck with his investigation,
 12 correct?
 13 A Yes, that is correct.
 14 Q Did he describe that agreement as
 15 public or secret?
 16 A He just told me about it during
 17 our meeting.
 18 Q In your experience, is that type
 19 of agreement normally a public matter?
 20 MR. LEVINE: Objection.
 21 A I think it's secret, because if
 22 it were public it would lead to criminal
 23 prosecution. It would be a criminal matter.
 24 Q Why would it be a criminal
 25 matter?

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1 OLEG A. LURIE
 2 THE INTERPRETER: The interpreter
 3 needs to check the dictionary.
 4 A Because that would constitute a
 5 conspiracy. If somebody conspires with the
 6 investigation it is a criminal matter all over
 7 the world.
 8 And I would also like to add, I'm
 9 not aware whether actual conspiracy from
 10 Magnitsky's patron took place, but he told me
 11 about that. So I learned it from his words.
 12 Q How do you know that that type of
 13 agreement would be a criminal matter in
 14 Russia?
 15 A It's a criminal matter in any
 16 country. It is called corruption.
 17 Q Have you reported on any such
 18 agreements -- have you investigated any such
 19 agreements?
 20 A I know facts and people who
 21 committed those actions were laid off, removed
 22 from the positions, arrested and sentenced to
 23 long terms. If you want examples, I can give
 24 you examples.
 25 Q Perhaps one example.

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1 OLEG A. LURIE
 2 A All right. About 10 years ago
 3 deputy head of the Investigative Committee of
 4 Russia was arrested. His last name is Dovgiy.
 5 He was accused of receiving bribes in the
 6 amount of 700,000 Euro, that is \$1 million
 7 U.S., for changing or altering various
 8 investigative actions.
 9 He served a prison term and he
 10 was just recently released before the end of
 11 his term, and he was stripped from all his
 12 regalia and all his benefits.
 13 Q Is it fair to say that this type
 14 of conspiracy between -- or conspiracy with an
 15 investigator about a criminal case is
 16 generally considered newsworthy in Russia?
 17 MR. LEVINE: Object to the form.
 18 MS. GRAHAM: What's the
 19 objection?
 20 MR. LEVINE: I object to the form
 21 of the question.
 22 MS. GRAHAM: What's the
 23 objection?
 24 MR. LEVINE: There are many vague
 25 terms in your question. It is unclear

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1 OLEG A. LURIE
 2 to what you are asking about. It seems
 3 to be asking him to render an opinion
 4 about a general -- upon a general
 5 hypothetical and not concerning the
 6 facts of what he wants, lacks
 7 foundation, and is probably over broad
 8 and ambiguous.
 9 MS. GRAHAM: Thank you.
 10 MR. LEVINE: You're welcome.
 11 Q Withdrawn.
 12 We have been talking about
 13 agreements between -- withdrawn.
 14 We have been talking about
 15 instances where people have conspired with
 16 investigators on criminal cases, correct?
 17 MR. LEVINE: Object to the form.
 18 A Yes.
 19 Q In your experience, as a
 20 journalist, when that happens is it of
 21 interest to the public?
 22 MR. LEVINE: Object to the form.
 23 A What, conspiracy?
 24 Q Yes, conspiracy with
 25 investigators in criminal cases?

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1 OLEG A. LURIE
 2 MR. LEVINE: Object to the form.
 3 A I do not understand the question.
 4 Q In your experience, as a
 5 journalist, are these conspiracies with
 6 investigators about criminal cases generally
 7 considered newsworthy in Russia?
 8 MR. LEVINE: Object to the form.
 9 A Unfortunately, it is impossible
 10 to prove until there is a criminal case and
 11 until there is a sentence.
 12 I, as a journalist, and my
 13 colleagues as well, cannot publish anything
 14 without proof, and a sentence might be such
 15 proof.
 16 MS. GRAHAM: This is a good time
 17 for a break.
 18 THE VIDEOGRAPHER: The time is
 19 10:51 a.m. We are going off the record.
 20 (A short break is taken.)
 21 THE VIDEOGRAPHER: This begins
 22 media unit number two. The time is
 23 11:08 a.m. We are back on the record.
 24 Q Mr. Lurie, you stated earlier
 25 that Sergei Magnitsky died while in detention.

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1 OLEG A. LURIE
 2 Do you know when Sergei Magnitsky
 3 died?
 4 A Yes, of course. In November.
 5 Yes, I think it was in November. Yes, I'm
 6 certain and I learned about it when I was
 7 already in prison.
 8 Q Is that November of 2009?
 9 A Yes.
 10 Q Did you investigate the
 11 circumstances of Sergei Magnitsky's death?
 12 A Three or four years later, after
 13 I was released, I investigated the issue of
 14 inadequate healthcare in Russian correctional
 15 or penitentiary systems; an inadequate level
 16 of healthcare led, possibly, to the death of
 17 Sergei Magnitsky while incarceration.
 18 Q What, if any, investigation did
 19 you do, specifically, about the circumstances
 20 of Sergei Magnitsky's death?
 21 A Are you talking about the
 22 healthcare issues?
 23 Q So, I understand that you
 24 researched inadequate healthcare, generally,
 25 in Russian prisons.

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1 OLEG A. LURIE
 2 What I'm asking now is, whether
 3 you investigated any of the specific
 4 circumstances of Sergei Magnitsky's death?
 5 A I did not investigate specific
 6 circumstances of Sergei Magnitsky's death.
 7 I only said or referred in my
 8 publications that the level of healthcare in
 9 Butyrka prison was inadequate, and that could
 10 possibly have led to death of Sergei
 11 Magnitsky, who was sick.
 12 Q Do you know what Sergei -- the
 13 specifics of Sergei Magnitsky's illness while
 14 in prison?
 15 A Only general, well-known facts.
 16 Q What are those facts?
 17 A As I learned from publications of
 18 other journalists, Sergei Magnitsky suffered
 19 from a number of diseases that led to his
 20 death, but I don't remember which diseases
 21 now.
 22 Q Did you speak with anyone who was
 23 there when Sergei Magnitsky died?
 24 MR. LEVINE: Object to the form.
 25 A I did not understand the

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1 OLEG A. LURIE
 2 question. Did I speak with anyone who was
 3 next to him when he died?
 4 Q Who was present and had direct
 5 knowledge of Sergei Magnitsky's death?
 6 A No, I did not speak with anyone.
 7 Q Did you speak with anyone who was
 8 in the same unit as Magnitsky in Butyrka
 9 prison with him?
 10 MR. LEVINE: Object to the form.
 11 A I cannot tell you exactly. I
 12 spoke with many people who were held at
 13 Butyrka prison, but I'm not sure whether these
 14 people were held at the same unit as Sergei
 15 Magnitsky.
 16 Q Did you appear in a movie called
 17 -- or a -- did you appear in a film titled
 18 Sherlock Holmes Investigates Magnitsky's
 19 Death?
 20 A Yes.
 21 Q In that film, did you say you had
 22 contact with people who were in the
 23 investigative solitary confinement ward with
 24 Sergei Magnitsky?
 25 A How can anybody be held in a

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1 OLEG A. LURIE
 2 solitary confinement with Sergei Magnitsky?
 3 It is solitary confinement.
 4 Q They are your own words from the
 5 movie.
 6 A It might be a translator mistake.
 7 Q Did you have contact with people
 8 who were in the same ward as Magnitsky in
 9 prison?
 10 A Yes. Yes. We are talking about
 11 the ward where it was translated as large
 12 specialize block, it is a block for white
 13 collar crimes, and a lot of people are held
 14 there and I did contact some of them.
 15 Q Did you speak with any of those
 16 people about Sergei Magnitsky?
 17 MR. LEVINE: Object to the form.
 18 A Subsequently, yes.
 19 Q What, if anything, did they tell
 20 you about Sergei Magnitsky?
 21 A They told me that he was never
 22 tortured, was never beaten up, no
 23 inconvenience has been caused or was caused to
 24 him, and he had no problems, neither with the
 25 prison administration nor with the

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1 OLEG A. LURIE
 2 investigation.
 3 Q Did they tell you the basis of
 4 their knowledge?
 5 A Yes. I know about that because
 6 Butyrka prison is a living organism, pretty
 7 much every cell knows what is going on in
 8 other cells, because there is or there was
 9 inter-cell communication network, there were
 10 opportunities to know what is going on in
 11 adjacent and not only adjacent cells.
 12 Q Did any of the people you spoke
 13 to in the same block as Sergei Magnitsky know
 14 anything about his medical condition during
 15 his imprisonment?
 16 MR. LEVINE: Object to the form.
 17 A It would be difficult for me to
 18 answer this question now.
 19 Q Why?
 20 A I don't remember.
 21 Q Did you read the autopsy report
 22 done on Mr. Magnitsky?
 23 MR. LEVINE: Object to the form.
 24 A I don't remember. I think I did.
 25 It was a long time ago.

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1 OLEG A. LURIE
 2 Q Do you remember anything that the
 3 autopsy report said?
 4 A Unfortunately, I don't remember
 5 the names of diseases Sergei had or suffered
 6 from.
 7 Q Was there any media coverage of
 8 Sergei Magnitsky's death?
 9 A Yes, of course.
 10 Q Was there a little, some, a lot?
 11 A After a certain period of time,
 12 after a period of time, as far as I know,
 13 there was a lot of publication regarding
 14 Sergei's death.
 15 Q When were there a lot of
 16 publications regarding Sergei Magnitsky's
 17 death?
 18 A I cannot give you the exact date,
 19 but I assume it was in December of 2009 and
 20 January of 2010, and after that all the time.
 21 Q When you say after that all the
 22 time, what do you mean?
 23 A The subject of Sergei Magnitsky
 24 has been addressed on a frequent basis, and
 25 there are polar opinions or drastically

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1 OLEG A. LURIE
 2 different approaches to that, and -- but it's
 3 been addressed all the time and it's very easy
 4 to find, just Google it.
 5 Q Is the subject of Sergei
 6 Magnitsky still receiving media coverage
 7 today?
 8 MR. LEVINE: Object to form.
 9 A I don't follow this subject all
 10 the time, because I investigate other matters.
 11 So I apologize.
 12 Q You said that the summer 2009,
 13 January 2010 there was a lot of coverage,
 14 media coverage of Sergei Magnitsky in Russia;
 15 throughout 2010 was there a lot of media
 16 coverage of Sergei Magnitsky in Russia?
 17 A I would like to draw your
 18 attention to the fact that during that period
 19 of time I was incarcerated, and the Internet
 20 is forbidden in prisons, and I had only access
 21 to several paper media, the newspapers, and to
 22 the Russian TV. So I'm not an expert on that.
 23 Q In the media you had access to in
 24 2010, was Sergei Magnitsky -- was there a lot
 25 of media coverage of Sergei Magnitsky?

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1 OLEG A. LURIE
 2 MR. LEVINE: Object to the form.
 3 A There were some publications,
 4 there were photographs published of Sergei
 5 Magnitsky, and that is how I recognized him
 6 and that is how I learned about his death.
 7 So there were publications, but
 8 not that many. But, again, I'm not an expert
 9 on that.
 10 Q You were released in December
 11 2011, correct?
 12 A Yes.
 13 Q In 2012 was there any media
 14 coverage of Sergei Magnitsky -- to be clear,
 15 this is in Russia?
 16 A Both Russian and Western media.
 17 Q Would you say that there was a
 18 lot of media coverage of Sergei Magnitsky in
 19 Russian media in 2012?
 20 MR. LEVINE: Object to the form.
 21 A I think less than attention to
 22 Putin or Obama. It is difficult for me to
 23 judge on the amount of the attention.
 24 Q Have you heard of something
 25 called the Magnitsky List?

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1 OLEG A. LURIE
 2 A Yes, I've heard.
 3 Q What is your understanding of the
 4 Magnitsky List?
 5 A In my opinion, Magnitsky List is
 6 a list of persons who somehow had something to
 7 do with killing of Sergei Magnitsky, which, in
 8 my opinion, did not take place.
 9 Q Was there reporting --
 10 withdrawn.
 11 Was there media coverage of the
 12 Magnitsky List in Russia in 2012?
 13 A Yes.
 14 Q A little, some, a lot?
 15 A I think it would be easier for me
 16 to answer this question in comparison with
 17 other events, because I did not track the
 18 number of visitors to the site where Magnitsky
 19 List was published.
 20 I did not track the number of
 21 readers of various newspapers, or the number
 22 of searches of various publications on Google.
 23 Q Perhaps a better way to ask the
 24 question is, was there daily reporting on the
 25 topic, weekly reporting, monthly reporting?

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1 OLEG A. LURIE
 2 MR. LEVINE: Object to the form.
 3 A Unfortunately, like everyone, I
 4 only have 24 hours a day at my disposal. I
 5 did not track or collect any statistics on how
 6 often those publications took place, whether
 7 they were frequent or irregular.
 8 I did not have any statistics on
 9 that.
 10 Q Mr. Lurie, you stated earlier
 11 that you follow the news in Russia and that is
 12 your job, correct?
 13 A Yes, of course.
 14 Q So I'm asking you whether in 2012
 15 the Magnitsky List was frequently reported on
 16 in Russia?
 17 MR. LEVINE: Object to the form.
 18 A Yes, there were publications.
 19 Some publications, but if we compare it with
 20 presidents, announcements or reports,
 21 speeches, that was frequent, but the idea of
 22 frequency is unclear to me.
 23 What is frequent, we have
 24 frequent soccer games.
 25 Q How often do you remember seeing

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1 OLEG A. LURIE
 2 an article of media coverage of the Magnitsky
 3 List in Russia in 2012, was it --
 4 A I did encounter those
 5 publications, but how frequent I cannot tell
 6 you.
 7 Q Can you estimate, was it once a
 8 day, once a week, once a month?
 9 A Unfortunately, I cannot. That is
 10 beyond me and nothing it can do.
 11 Q Did you ever come across a media
 12 report where anyone stated that they had
 13 spoken with Sergei Magnitsky in prison?
 14 A I think I've never encountered --
 15 -- I think I've never encountered publication
 16 where somebody claimed that he or she had
 17 conversations with Sergei Magnitsky. I'm not
 18 talking about myself. I'm talking about other
 19 people.
 20 Q Have you ever come across a
 21 publication where someone claimed knowledge of
 22 the agreement that Sergei Magnitsky described
 23 between his protector and the investigator?
 24 A I don't remember. Possibly.
 25 THE VIDEOGRAPHER: We are going

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1 OLEG A. LURIE
 2 off the record. The time is 11:42 a.m.
 3 (Off-the-record discussion.)
 4 THE VIDEOGRAPHER: The time is
 5 11:48 a.m. We are back on the record.
 6 MR. LEVINE: Before you continue,
 7 I asked the videographer during the
 8 break, to compile the time we spent on
 9 the record. I spent, approximately,
 10 four hours on the record, you have
 11 spent, approximately, three hours on the
 12 record. So we are getting close to the
 13 seven-hour limit.
 14 How much more do you think you
 15 are going to have with this witness? I
 16 appreciate the fact that there is a
 17 translator here and we are doing this
 18 over a videographer, but we are
 19 approaching the limit and I want to be
 20 reasonable, but I also do not want to
 21 extend this deposition indefinitely.
 22 MS. GRAHAM: I anticipate perhaps
 23 another hour. I understand it's Friday,
 24 and I think, certainly, everyone has an
 25 interest in concluding as soon as

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1 OLEG A. LURIE
 2 possible; however, I have only done
 3 three hours so far, as we were entitled
 4 to seven.
 5 I anticipate another hour, it
 6 might, potentially, be a little longer,
 7 depending how fast we can move through
 8 the questions.
 9 MR. LEVINE: The government is
 10 not entitled to a separate seven-hour
 11 deposition of the witness. The
 12 deposition, in total, is supposed to be
 13 seven hours per witness.
 14 As I said, I appreciate the fact
 15 that there is a translator here and we
 16 are doing this via remote means,
 17 however, it is not an invitation to
 18 extend this deposition for this witness
 19 -- seven hours for the government to
 20 continue an examination.
 21 I also need an opportunity to do
 22 some redirect, if appropriate, which I
 23 have yet to decide whether it would be.
 24 So, therefore, I will give you a
 25 little latitude to finish questioning,

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1 OLEG A. LURIE
 2 but you need to start bringing your
 3 examination to a close sooner rather
 4 than later to stay consistent with rule
 5 30d1.
 6 MS. GRAHAM: We strongly
 7 disagree. I am happy to discuss this
 8 further off the record so we are not
 9 eating into my deposition time with this
 10 deposition.
 11 MR. LEVINE: I will not count
 12 this time in your time. Let's go off
 13 the record.
 14 THE VIDEOGRAPHER: The time is
 15 11:53 a.m. We are going off the record.
 16 (Off-the-record discussion.)
 17 THE VIDEOGRAPHER: The time is
 18 11:58 a.m. We are back on the record.
 19 Q Was there any media coverage of
 20 Sergei Magnitsky in 2013?
 21 MR. LEVINE: Object to the form.
 22 Q This is in Russia.
 23 MR. LEVINE: Object to the form.
 24 A Yes. Yes.
 25 Q Multiple articles?

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1 OLEG A. LURIE
 2 A I can't say multiple, but there
 3 were publications.
 4 Q Was there media coverage in
 5 Russia of the Magnitsky List in 2013?
 6 A Yes, it was covered.
 7 Q Multiple publications?
 8 MR. LEVINE: Object to the form.
 9 A I cannot say multiple, but there
 10 were some publications. The number isn't
 11 known to me.
 12 Q Was there media coverage in
 13 Russia on the subject of Sergei Magnitsky in
 14 2014?
 15 A Yes.
 16 Q Was there media coverage in
 17 Russia on the subject of the Magnitsky List in
 18 2014?
 19 A I think yes, and I believe using
 20 search engines in the Internet one can get
 21 detailed statistics in that regard.
 22 Unfortunately, I do not have
 23 those statistics.
 24 Q You stated that at some point you
 25 realized that William Browder was one of the

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1 OLEG A. LURIE
 2 people that Sergei Magnitsky had referred to
 3 in prison as his employers, when did you
 4 realize that?
 5 MR. LEVINE: Object to the
 6 characterization. The record will
 7 reflect what was testified to.
 8 A I realized that after I read
 9 about it in the media, and from multiple
 10 interviews of William Browder, in which he
 11 stated numerous times that Magnitsky was his
 12 important employee and a lawyer, I think.
 13 Q When did you learn this?
 14 A I learned about this,
 15 approximately, in 2012, after I got released
 16 from incarceration, after I got access to the
 17 Internet.
 18 Q Have you investigated William
 19 Browder at all as a journalist?
 20 A Yes.
 21 Q When did that begin?
 22 A It began about 10 years ago.
 23 Q Have you published any articles
 24 on William Browder?
 25 A Yes.

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1 OLEG A. LURIE
 2 Q How many, approximately?
 3 A I cannot count them, but they are
 4 all in open source. All you need to do is
 5 just type in a search engine Oleg Lurie,
 6 William Browder and you will be able to find
 7 them on the official media portals.
 8 Q Have you published more than 10
 9 articles about William Browder?
 10 A Unfortunately, I did not count
 11 them. I could not tell you.
 12 Q You don't know if you published
 13 more than 10 articles about William Browder?
 14 MR. LEVINE: Objection. That is
 15 not his testimony.
 16 A I did not count my articles, and
 17 I did not track numbers. I evaluate my
 18 articles -- or rather my articles are
 19 evaluated by my readers. I did not count
 20 them.
 21 Q Sitting here today, you have no
 22 knowledge of how many articles -- withdrawn.
 23 Sitting here today, your
 24 testimony is that you can't estimate how many
 25 articles you published about William Browder;

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1 OLEG A. LURIE
 2 is that correct?
 3 A If I had access to the Internet
 4 now or should I have known beforehand, I would
 5 have prepared. I think there might be less
 6 than 10 but I don't know now.
 7 If I could use the Internet I
 8 will be able to answer this question.
 9 Q Have you published any articles
 10 about the Magnitsky List?
 11 MR. LEVINE: Object to the form.
 12 A Yes, I published them.
 13 Q Approximately, how many?
 14 A One or two -- I cannot tell you
 15 exactly. Magnitsky List is a broad subject.
 16 It could be just referenced in
 17 other articles, not directly connected to
 18 Magnitsky.
 19 Q So you have -- how many articles
 20 have you written referencing the Magnitsky
 21 List?
 22 A I cannot give you the numbers
 23 because I don't know. Again, if I had an
 24 opportunity to use the Internet right now I
 25 would have given you the statistics.

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1 OLEG A. LURIE
 2 Q Have you published any articles
 3 about Sergei Magnitsky?
 4 A Yes.
 5 Q How many articles?
 6 A Not many. But again, I cannot
 7 give you exact numbers. There were articles
 8 where Magnitsky's name was mentioned. Five,
 9 eight, maybe 10 articles. I don't have exact
 10 numbers.
 11 Q In any of those articles about or
 12 referencing Sergei Magnitsky, did you mention
 13 the discussions that you had with Sergei
 14 Magnitsky at Butyrka?
 15 A Without going into details,
 16 briefly.
 17 Q What do you mean "briefly"?
 18 A I did not publish any transcripts
 19 of our conversations, the first or the second.
 20 I just mentioned that these
 21 conversations took place and briefly described
 22 what they were.
 23 Q When you say "briefly described
 24 what they were", what did you say in these
 25 articles?

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1 OLEG A. LURIE
 2 A Is this the question about
 3 articles only or it includes my participation
 4 in radio programs, TV programs?
 5 Q Why don't we stick to articles
 6 for now. We can discuss the others later.
 7 A I don't remember, exactly, the
 8 details. I would need to reread the article
 9 or have it read to me. I cannot tell you,
 10 exactly, now without looking into it.
 11 Q In any of these articles, did you
 12 write about what Sergei Magnitsky had told you
 13 about his employers?
 14 A Possibly, but I don't remember
 15 exactly. I would also like to add that Sergei
 16 Magnitsky, William Browder are relatively
 17 small subjects for me.
 18 I publish hundreds of articles in
 19 dozens of subjects that are of interest to me.
 20 So it is extremely difficult for
 21 me to provide verbatim explanation of what was
 22 published, where and when, without referring
 23 to those articles, without access to computer,
 24 or to the Internet.
 25 Dozens of subjects not related to

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1 OLEG A. LURIE
 2 Sergei Magnitsky or William Browder.
 3 My words are very easy to verify,
 4 it's enough just to open the Internet and type
 5 in my name and you will see that the articles
 6 about Sergei Magnitsky and William Browder are
 7 not at the top of the list.
 8 There are other articles more
 9 popular, but the articles about them will be
 10 there as well.
 11 Q You stated earlier you
 12 participated in a film Sherlock Holmes
 13 Investigates Magnitsky's Death in 2014, was
 14 the main subject of this film William Browder?
 15 A Including Browder, the full title
 16 of the film is Sherlock Holmes Investigates
 17 Magnitsky's Death Full Stop, Letter B, and B
 18 means Browder, as far as I understand the
 19 director's idea.
 20 Q Did you discuss William Browder
 21 in this film?
 22 A Yes.
 23 Q Did you discuss Sergei
 24 Magnitsky's death in this film?
 25 A I think yes.

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1 OLEG A. LURIE
 2 Q Did you state that you had spoken
 3 with Sergei Magnitsky in prison before his
 4 death?
 5 A I believe yes. Yes.
 6 Q Did you mention what Magnitsky
 7 had told you in prison about his employers in
 8 the film?
 9 A Unfortunately, I don't remember,
 10 but I think yes. But I don't remember
 11 exactly.
 12 Q Did you mention what Magnitsky
 13 had told you in prison about his criminal case
 14 in the film?
 15 A Yes, and I think I answered this
 16 question. I participated in the film three
 17 years ago and I saw it two years ago. So I
 18 don't remember exactly, but I think yes.
 19 Q Now, you stated that in the
 20 second meeting with Magnitsky and this is
 21 earlier in your deposition, you stated that
 22 Magnitsky told you his employers had asked him
 23 to sign documents, correct?
 24 A Yes. Not documents, testimony.
 25 Testimony for the investigator.

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1 OLEG A. LURIE
 2 Q Did Magnitsky describe the
 3 testimony that his employers wanted him to
 4 sign?
 5 A He informed me that the testimony
 6 which his employers were trying him to sign,
 7 did not have anything to do with his criminal
 8 case and then the investigator never
 9 questioned him about the facts in that
 10 testimony, and that surprised and scared him.
 11 Q Did you mention what Magnitsky
 12 told you in prison about this testimony in the
 13 Sherlock Holmes film?
 14 A I cannot tell you with all
 15 certainty now. Possibly, yes. But like I
 16 said, time passed since I saw that and I might
 17 have given these details in the film, I might
 18 have given some other details.
 19 Q Who produced the Sherlock Holmes
 20 film?
 21 A I don't know the name, but as far
 22 as I know, it was a British TV studio.
 23 Q Do you know --
 24 A That filmed that film.
 25 Q Do you know the name of the TV

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1 OLEG A. LURIE
 2 studio?
 3 A At the moment, I don't remember
 4 but it's very easy to find out. It is enough
 5 for me to just get home and pull up the
 6 business cards I have.
 7 And also, this film is on-line
 8 and in its course one can see the producer,
 9 one can see the company. Unfortunately, my
 10 memory does not store the information in such
 11 large volumes.
 12 Q Who approached you about
 13 appearing in the film?
 14 A A representative of that company,
 15 and I agreed and they came to Moscow and
 16 filmed me.
 17 Q How did they describe the film?
 18 A They said that this is some kind
 19 of an investigation of life, or rather
 20 activities of William Browder and his circle,
 21 they conducted their own journalist or
 22 television journalist investigation.
 23 Q Do you know who funded the film?
 24 A I would like to finish answering
 25 the previous question. I was just one of the

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1 OLEG A. LURIE
 2 people who provided the commentary in the
 3 film.
 4 The answer to the next question
 5 is no, I don't know.
 6 Q Was the film broadcast in Russia?
 7 A Yes. It was broadcasted in
 8 Russia as well.
 9 Q On what channel?
 10 A On NTV.
 11 Q Is that a government owned
 12 channel?
 13 A As far as I know, there is only
 14 one government owned channel in Russia it is
 15 called Russia 1. The rest of the channels are
 16 private.
 17 Q You stated earlier that in 2014
 18 Nataliya Veselnitskaya contacted you, how did
 19 she contact you?
 20 A She called my official cell phone
 21 number.
 22 Q Did you know her prior to this
 23 call?
 24 A No.
 25 Q Did you meet after this call?

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1 OLEG A. LURIE
 2 A Yes.
 3 Q Did she tell you why she wanted
 4 to meet prior to your meeting?
 5 A Yes. Naturally, she introduced
 6 herself and she told me who she was and what
 7 kind of cases she worked on and I found it
 8 interesting, as a journalist, because I
 9 thought that would give me access to certain
 10 information, and that is what happened. She
 11 provided me with information that I used in my
 12 articles.
 13 Q What kind of information did she
 14 provide you with?
 15 A She gave me two interviews. They
 16 are publicly available. They are on the
 17 Internet. They were like regular kind of
 18 interviews that I later published, and the
 19 information she provided me with is in those
 20 interviews.
 21 Q Where did you publish these two
 22 articles?
 23 A They were published in my
 24 personal blog on oleglurielg.com, and also on
 25 the website of Moskowitz radio station, and I

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1 OLEG A. LURIE
 2 also spoke about those articles in radio
 3 programs on Vesti FM.
 4 Q What was the subject of those
 5 articles?
 6 MR. LEVINE: Object to the form.
 7 A Both articles are publicly
 8 accessible. Both of them are very large.
 9 So I don't remember verbatim, but
 10 the first article was about William Browder
 11 and the second article was about William
 12 Browder as well, and Mr. Baranoski who now
 13 serves a long sentence, he was convicted for
 14 extortion.
 15 Q Was Denis Katsyv mentioned in any
 16 of those articles?
 17 A Yes, in one of them.
 18 Q Was Sergei Magnitsky mentioned in
 19 either of those articles?
 20 A Yes, in one of them.
 21 Q What was said about Sergei
 22 Magnitsky?
 23 A I don't remember, exactly, now
 24 and if I try to remember I might make a
 25 mistake; so it might be better to check those

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1 OLEG A. LURIE
 2 articles.
 3 Because, again, they are publicly
 4 available and I don't want to make mistakes.
 5 Q What did you write about Denis
 6 Katsyv in the articles?
 7 A I will only tell you what I
 8 remember. He was mentioned in connection with
 9 the fact that he was the person who was
 10 subject to extortion of large amounts of money
 11 by Mr. Baranoski.
 12 Mr. Baranoski was later sentenced
 13 to 14 years of imprisonment, and the court
 14 found that Mr. Baranoski did try to extort
 15 large amounts of money from Denis.
 16 Q You stated that your interviews
 17 with -- you stated that your interviews with
 18 Ms. Veselnitskaya, that you spoke about your
 19 interviews with Ms. Veselnitskaya in a radio
 20 program on Vesti FM, were you paid for those
 21 appearances on Vesti FM?
 22 A I would like to say that I have a
 23 rule, that if any interview is mentioned
 24 during any of the programs I do not get paid,
 25 whatsoever, unless it is my personal

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1 OLEG A. LURIE
 2 investigation, where I present the facts that
 3 I personally investigated and where I use my
 4 words.
 5 If I talk about interviews with
 6 other people I do not get paid for that at
 7 all. That is a rule, so I would not be
 8 accused of anything.
 9 Q So were you paid for your
 10 appearance on the Vesti programs where you
 11 discussed your interviews with Ms.
 12 Veselnitskaya?
 13 A No. And once again, I will tell
 14 you she appeared live in my programs and I
 15 interviewed her live, and I did not receive
 16 any payment for that.
 17 Q You stated earlier in October
 18 2014 you met with Ms. Veselnitskaya in person,
 19 did you record this conversation?
 20 A Why should I have recorded it? I
 21 knew who she was. I checked the Internet with
 22 regard to Ms. Veselnitskaya before we met.
 23 No, I did not record it.
 24 Q You stated that Ms. Veselnitskaya
 25 took your written testimony at this meeting,

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1 OLEG A. LURIE
 2 how did she take your written testimony?
 3 A Did I say that?
 4 Q If you want to refer to paragraph
 5 53 of the Declaration.
 6 A I'm talking about our first
 7 meeting. It did not happen.
 8 Q Paragraph 53 states, and you are
 9 welcome to look at it, Exhibit A, it states in
 10 the English, in the middle of the paragraph; I
 11 assume it is the same in the Russian, "a bit
 12 later she took my written testimony as a
 13 court attorney"?
 14 A Yes, that is exactly what it
 15 says. But "a bit later" means not in the
 16 meeting, meaning not at that meeting, it was
 17 later.
 18 If we read before that it says
 19 that during the meeting I told her about my
 20 conversations with Sergei Magnitsky at prison
 21 or during incarceration, and then it says "a
 22 bit later she took my written testimony as a
 23 court attorney." It happened not at that
 24 meeting.
 25 Q Thank you for the correction.

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1 OLEG A. LURIE
 2 When did she take your written
 3 testimony?
 4 A I don't remember exactly, but I
 5 think several days later we met and I gave
 6 written testimony. I verified and signed.
 7 Q How did she take your written
 8 testimony?
 9 A I spoke or I might have given --
 10 typed on the computer. I don't remember now.
 11 Q Do you remember if she wrote it
 12 down or did you write it down?
 13 A Difficult question. I don't
 14 remember.
 15 Q Is the written testimony this
 16 Declaration or is it a different document?
 17 A I cannot tell you exactly. I
 18 need to see the documents. I need to see the
 19 papers, to see the one paper or the other
 20 paper to compare them and then I will be able
 21 to tell you. I need to see them.
 22 But I would like to under score
 23 that -- one second -- yes, the document was
 24 signed by me on February 13, 2015, it was
 25 written based on my words and it is identical

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1 OLEG A. LURIE
 2 to what I said.
 3 Q So is the Declaration that is
 4 Exhibit A, is that the written testimony
 5 referred to in paragraph 53?
 6 MR. LEVINE: Objection.
 7 A There is a possibility that it
 8 was not the only time when I gave testimony,
 9 but I do not have that testimony with me at
 10 the moment to compare.
 11 MS. GRAHAM: We would ask for the
 12 production of any such testimony of the
 13 witness.
 14 Q You stated that Ms. Veselnitskaya
 15 ask that you not speak with anyone else about
 16 your discussions with Sergei Magnitsky in
 17 prison at this meeting, did she say why?
 18 A She said that the testimony might
 19 be used as evidence in court. She did not
 20 specify which court, and that is why I did not
 21 speak in detail about those events. I only
 22 briefly mentioned them.
 23 Q Why couldn't you discuss them in
 24 detail?
 25 A I don't know. I think this is

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1 OLEG A. LURIE
 2 the question for Ms. Veselnitskaya.
 3 Q Did you agree to this?
 4 A Yes, I agreed because to me a
 5 lawyer is a lawyer.
 6 And right now can we take a
 7 couple minute break, please?
 8 THE VIDEOGRAPHER: The time is
 9 12:49 p.m. We are going off the record.
 10 (A short break was taken.)
 11 THE VIDEOGRAPHER: This begins
 12 media unit number three. The time is
 13 1:01 p.m. We are back on the record.
 14 MR. LEVINE: Ms. Graham, how much
 15 additional time do you have with the
 16 witness?
 17 MS. GRAHAM: Mr. Levine, it is
 18 hard to estimate. I have a few more
 19 topics to cover.
 20 MR. LEVINE: We are now entering
 21 the eighth hour of the deposition of
 22 this witness.
 23 We each had equal time with the
 24 witness, and the witness -- and the
 25 rules specifically state seven hours.

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1 OLEG A. LURIE
 2 I said I would give you some
 3 latitude, but I think we're getting into
 4 a very long deposition of the witness.
 5 MS. GRAHAM: Mr. Levine, we have
 6 only been deposing the witness for four
 7 hours. We have accorded you seven
 8 hours, and in one case over seven hours
 9 to depose our witnesses. We are
 10 entitled to seven hours to depose your
 11 witness, any attempt to cut that short
 12 we will strenuously object to.
 13 This deposition has -- I have not
 14 been dragging out this deposition in any
 15 way, but I will take the time to which
 16 I'm entitled.
 17 MR. LEVINE: The rule specifies a
 18 seven-hour deposition of a witness. We
 19 took seven hours of a witness and you
 20 took additional time on top of that,
 21 that total time was, approximately, nine
 22 hours, probably a little bit less than
 23 that given that.
 24 We are in the -- now beginning
 25 the eighth hour of the witness'

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1 OLEG A. LURIE
 2 deposition. I would suggest we try to
 3 finish it up before the ninth hour.
 4 MS. GRAHAM: I thank you for your
 5 suggestion. I am aware that everyone's
 6 time is valuable, especially Mr.
 7 Lurie's. I do have several more topics
 8 to cover.
 9 Mr. Lurie --
 10 MR. LEVINE: Can you give an
 11 approximation of how much longer you
 12 will be using for the deposition?
 13 MS. GRAHAM: It is difficult to
 14 approximate, as you know. I have
 15 several more topics to cover, and with
 16 that I think we should continue the
 17 deposition.
 18 MR. LEVINE: How many more topics
 19 do you have to cover?
 20 MS. GRAHAM: I have several more
 21 topics. I think we should continue the
 22 deposition.
 23 MR. LEVINE: How many is several?
 24 MS. GRAHAM: Mr. Levine, I am not
 25 required to set forth for you the

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1 OLEG A. LURIE
 2 outline of the rest of the deposition.
 3 I would, respectfully, suggest if
 4 we can continue we can conclude earlier.
 5 MR. LEVINE: You are required to
 6 comply with the Federal Rules of Civil
 7 Procedure, Rule 30d1, a deposition of
 8 seven hours.
 9 If there are extenuating
 10 circumstances they will allow you
 11 additional time, which I have recognized
 12 exists in this case; however, it does
 13 not warrant that you get to take an
 14 entire deposition of Mr. Lurie a
 15 complete seven hours.
 16 MS. GRAHAM: We disagree about
 17 the rules and their application in this
 18 case. I think we are entitled to seven
 19 hours, and I am going to take the time
 20 that I need today and we would object to
 21 that being cut short.
 22 If you want to cut that short we
 23 can discuss that with the court,
 24 otherwise, I suggest we continue with
 25 the deposition.

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1 OLEG A. LURIE
 2 MR. LEVINE: I would also like to
 3 point out before we continue, I will
 4 allow you to your four hours of
 5 deposition time with Mr. Lurie, but it
 6 is also 8 o'clock now in Moscow and we
 7 are pushing the limit of what the
 8 witness can do in the course of a day.
 9 MS. GRAHAM: If Mr. Lurie is not
 10 capable of finishing his deposition this
 11 evening he can state so, and we can
 12 finish the deposition on another date,
 13 but I believe that is up to him to
 14 state.
 15 Q Mr. Lurie, you stated just before
 16 the break that you agreed to Ms.
 17 Veselnitskaya's request that you not discuss
 18 your conversations with Mr. Sergei Magnitsky
 19 because a lawyer is a lawyer, what did you
 20 mean by that?
 21 A As far as I understood, my
 22 testimony regarding Sergei Magnitsky to
 23 Nataliya Veselnitskaya could be used in some
 24 court proceeding, and I understood that it is
 25 not advisable to provide details about the

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1 OLEG A. LURIE
 2 information that can be used in court prior to
 3 that.
 4 Q Did you know what this court
 5 proceeding that your testimony could be used
 6 in was?
 7 A I cannot tell you now. I don't
 8 remember.
 9 Q Did she say where this court case
 10 was taking place?
 11 A Unfortunately, I don't remember
 12 that as well. It was a long time ago.
 13 Q Did you know who was involved in
 14 the case?
 15 A Now I know.
 16 Q What do you know about the case
 17 -- what did you know -- did you know who the
 18 parties to the case were then?
 19 A I cannot tell you. I don't
 20 remember. Then, I don't.
 21 Q After your meeting with Ms.
 22 Veselnitskaya, did you discuss your
 23 conversations with Sergei Magnitsky in prison
 24 with anyone?
 25 A In detail, no.

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1 OLEG A. LURIE
 2 Q Did you write about your
 3 conversations with Sergei Magnitsky in prison
 4 after your conversation with Ms.
 5 Veselnitskaya?
 6 A I only -- only during the radio
 7 program on Vesti FM radio station. I only
 8 mentioned that they did take place, and in two
 9 or three sentences I briefly described them.
 10 Q What did you say in those two to
 11 three sentences to describe them?
 12 A I don't remember exactly now, but
 13 this program is publicly accessible, it is on
 14 the Internet, both the video and the audio.
 15 Q So other than this radio program,
 16 did you discuss with anyone your conversations
 17 with Sergei Magnitsky in prison after your
 18 meeting with Ms. Veselnitskaya?
 19 A Do you mean publicly discuss or
 20 in private conversations?
 21 Q Publicly discussed.
 22 A I believe no.
 23 Q What about private conversations?
 24 A In private conversations, yes.
 25 Q With whom?

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1 OLEG A. LURIE
 2 A I described that in my testimony
 3 in details, also in my testimony to
 4 Mr. Levine. I explained that certain people
 5 approached me with an offer that went against
 6 journalists' ethics.
 7 Q Any other conversations other
 8 than what you have already discussed in your
 9 testimony and in the Declaration?
 10 A No.
 11 Q The Declaration that is Exhibit
 12 A, who asked you to create this?
 13 A This Declaration was created, I
 14 believe, in December of last year. Mr. Levine
 15 took this Declaration and created it based on
 16 my words.
 17 Q Who drafted the Declaration?
 18 A I did. I said these are my
 19 words, word-for-word.
 20 Q Who actually wrote the
 21 Declaration?
 22 A I don't remember it now.
 23 Q Who decided what to include in
 24 the Declaration?
 25 A I told everything I knew and

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1 OLEG A. LURIE
 2 everything that was related to Mr. Magnitsky
 3 from A to Z.
 4 If you read it carefully you will
 5 see that this is only about that and nothing
 6 else.
 7 Q I have read it carefully, thank
 8 you.
 9 Did someone tell you that the
 10 Affidavit would be about Sergei Magnitsky?
 11 A Well, yes, Nataliya Veselnitskaya
 12 approached me to tell how it was in reality,
 13 and she also took earlier testimony, that is
 14 why she approached me and that is why I did
 15 it.
 16 Q Did anyone tell you what this
 17 Declaration would be used for?
 18 A As far as I understood, for a
 19 court hearing -- or court proceedings.
 20 Q Did you understand that this
 21 Declaration would be provided to the U.S.
 22 government?
 23 MR. LEVINE: Objection.
 24 A Well, I didn't go deep into legal
 25 aspects of that, but I understand that my

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1 OLEG A. LURIE
 2 testimony somehow would involve prosecution.
 3 Q Do you know why you are here
 4 today?
 5 A Yes, I think I do.
 6 Q What is your understanding of why
 7 you are here today?
 8 A As far as I understand, the court
 9 proceedings and I'm a witness to the case and
 10 I read the title, it says the United States of
 11 America versus Prevezon Company, I believe and
 12 U.S. Attorney's office called me to give
 13 deposition with regard to this case.
 14 Q Do you know what the case is
 15 about?
 16 A I cannot tell you in details.
 17 Q What do you know about what the
 18 case is about?
 19 A Okay. I know from publicly
 20 available sources from the media, that
 21 Mr. Katsyv and companies he owned, Prevezon
 22 and some others, were accused of certain
 23 illegal activity, money laundering, and in
 24 connection with Magnitsky, their property was
 25 arrested, as far as I understand it, but I'm

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1 OLEG A. LURIE
 2 not a lawyer.
 3 Q Have you written any articles
 4 referencing this case?
 5 A I don't remember. No. Possibly,
 6 but not directly related to this case.
 7 Q Do you know Denis Katsyv?
 8 A Personally? No, as far as I
 9 remember.
 10 Q Have you ever met him?
 11 A Possibly. Possibly. But I meet
 12 a lot of people. That is my profession.
 13 Q Have you ever spoken with Denis
 14 Katsyv?
 15 A I'm not sure that it was him.
 16 Q What do you mean?
 17 A Possibly. It is possible that I
 18 met him. I meet with a lot of people. So now
 19 I'm recalling possibly. Possibly. Maybe,
 20 yes.
 21 Q When do you think you may have
 22 met him?
 23 A I think -- I think it was at the
 24 offices of Ms. Veselnitskaya, if I'm not
 25 mistaken. That is how I remember it now. I

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1 OLEG A. LURIE
 2 think it was there.
 3 Q Why were you -- please continue.
 4 A If it was him in fact. I can
 5 only assume that it was him. We didn't
 6 communicate much.
 7 Q Why were you at the offices of
 8 Ms. Veselnitskaya on that occasion?
 9 A I was at her offices several
 10 times, including in December of last year.
 11 The last time I gave testimony it took place
 12 at her office.
 13 Q This person you think may have
 14 been Denis, was he present when you gave
 15 testimony?
 16 A No. Nobody was present at the
 17 testimony except the attorney who took the
 18 testimony and Ms. Veselnitskaya.
 19 Q Do you know Peter Katsyv?
 20 MR. LEVINE: Objection.
 21 A No. No, I don't know him.
 22 Q Do you know Alexander Lichtbach?
 23 A I don't know him.
 24 Q Do you know Tim Figkritz (ph)?
 25 A No. No, I don't know.

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1 OLEG A. LURIE
 2 Q Do you know Gabriella
 3 Volshteyn?
 4 A No, I don't know.
 5 Q Do you know Sergei Kim?
 6 A No, I don't know him.
 7 Q Do you know Leonard Petroff?
 8 A No, I don't know.
 9 Q You stated that Ms. Veselnitskaya
 10 was an attorney, did she ever represent you?
 11 A Yes.
 12 Q Did she represent you with
 13 anything connected to Sergei Magnitsky?
 14 A No.
 15 Q In what did she represent you?
 16 THE INTERPRETER: I need to check
 17 the dictionary.
 18 A In summer of this year a
 19 complaint was filed against me claiming that I
 20 violated the -- committed an act of defamation
 21 against the owner and dignity of former Prime
 22 Minister of the Russian federation Mr.
 23 Michailovic.
 24 Nataliya Veselnitskaya
 25 represented me and the case was dismissed.

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1 OLEG A. LURIE
 2 Q Did you pay Ms. Veselnitskaya for
 3 her representation of you?
 4 A I'm sorry --
 5 THE INTERPRETER: The witness
 6 wanted to continue the previous
 7 question.
 8 A Also, Nataliya Veselnitskaya
 9 represented me and her law firm represented me
 10 in the proceedings to clear my criminal
 11 record. I don't know how you would translate
 12 that into English.
 13 Also, there is another case
 14 against me. A complaint filed by a member of
 15 the Presidential Consult on human rights,
 16 Mr. Klyabin, claiming that I violated his
 17 honor and dignity.
 18 Q When did those proceedings to
 19 clear your criminal record begin?
 20 A Two months ago, I believe.
 21 Q When was the complaint filed
 22 against you by Mr. Klyabin?
 23 A In the summer of this year, 2015.
 24 Q Are you paying Ms. Veselnitskaya
 25 for her representation of you in these

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1 OLEG A. LURIE
 2 matters?
 3 A Yes, of course. How else?
 4 Q Are any of these matters still
 5 going on today?
 6 A Only one. Klyabin's complaint,
 7 and only because it was adjourned, the last
 8 hearing was adjourned.
 9 Q What was the result of the
 10 proceedings to clear your criminal record?
 11 A My record was cleared before the
 12 set period of time expired for the criminal
 13 record to stay on the record, and it was
 14 cleared by the court.
 15 Q Is your conviction for extortion
 16 still on your criminal record?
 17 A No. As of today in the -- in
 18 accordance with the Constitution of the
 19 Russian Federation, I have no criminal record.
 20 Q Why is your extortion conviction
 21 no longer part of your criminal record?
 22 A Because it was cleared by the
 23 court about a month ago, or even less.
 24 Q How was it cleared?
 25 A By the court's decision. I can

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1 OLEG A. LURIE
 2 provide you with a copy of that decision. I
 3 don't have it on me right now, but I can do
 4 it.
 5 Q Thank you.
 6 A Thank you.
 7 Q How many times have you met or
 8 communicated with Nataliya Veselnitskaya?
 9 A I cannot tell you exactly --
 10 well, I cannot tell you exactly because she
 11 represented me in court and of course, I met
 12 with her certain number of times.
 13 How else, she was my attorney but
 14 prior to that I think I met with her several
 15 times.
 16 Q During those meetings did you
 17 discuss the Prevezon Holdings case?
 18 A No.
 19 Q You said earlier you had --
 20 withdrawn.
 21 A Can I ask you, we need more time,
 22 can we take a lunch break then, please?
 23 Q Certainly we can take a break.
 24 THE VIDEOGRAPHER: The time is
 25 1:44 p.m. We are going off the record.

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1 OLEG A. LURIE
 2 (A luncheon recess is taken.)
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1 OLEG A. LURIE
 2 familiar with that. So I'm happy to
 3 discuss the administrative parts
 4 afterwards.
 5 Q Mr. Lurie, you said earlier you
 6 have a personal blog, do you pay attention to
 7 which articles you publish receive more views
 8 than others?
 9 A Yes. Yes.
 10 Q And you stated earlier that Ms.
 11 Veselnitskaya at your meeting gave you certain
 12 materials, was that only the two interviews or
 13 were there other materials?
 14 A I would like to state that it was
 15 her interview, in great detail, published
 16 within that large article, and for me as a
 17 journalist it was very interesting.
 18 Q Thank you for the clarification.
 19 Did Ms. Veselnitskaya give you
 20 any other materials?
 21 MR. LEVINE: Objection to form.
 22 A No.
 23 Q Did she give you at that first
 24 meeting any other materials for use in your
 25 work as a journalist?

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1 OLEG A. LURIE
 2 *****
 3 AFTERNOON SESSION
 4 *****
 5 THE VIDEOGRAPHER: The time is
 6 2:16 p.m. We are back on the record.
 7 MR. LEVINE: Before we start, I
 8 renew my prior objection for the
 9 continuation of this deposition.
 10 MS. GRAHAM: We renew our prior
 11 assertions that we are entitled to seven
 12 hours with defense witnesses.
 13 MR. LEVINE: Is it the United
 14 States' position that it is going to be
 15 paying for a two-day deposition?
 16 MS. GRAHAM: I'm not sure what
 17 you mean.
 18 MR. LEVINE: Paying the court
 19 reporter, the videographer, the
 20 translator, since you have taken up all
 21 the time today?
 22 MS. GRAHAM: We can discuss
 23 financial arrangements after. I
 24 believe, generally, we pay for our
 25 portion of the deposition. I'm not

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1 OLEG A. LURIE
 2 A No.
 3 Q You said that you published those
 4 two large articles containing the interviews
 5 with Ms. Veselnitskaya on your personal blog,
 6 correct?
 7 A Yes.
 8 Q Did those two articles receive a
 9 lot of views?
 10 MR. LEVINE: Object to the form.
 11 A I don't remember it now, but I
 12 believe quite a lot. May I also add to the
 13 previous question?
 14 Q Certainly.
 15 A Thank you.
 16 I also remember that I used a
 17 video published by Nataliya Veselnitskaya on
 18 Facebook. The video showing William Browder
 19 running away from people trying to serve a
 20 subpoena on him to appear in court, I believe
 21 in this court. So that was the video that I
 22 used.
 23 Q Did she give you any materials
 24 other than that to use in your work as a
 25 journalist?

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1 OLEG A. LURIE
 2 A No.
 3 Q You stated yesterday that you
 4 record all calls from unknown numbers, how
 5 many of those do you receive?
 6 A A lot. --
 7 THE INTERPRETER: He said not a
 8 lot.
 9 Q Do you record any other phone
 10 calls?
 11 A Yes, I remember. Not all of
 12 them, but I do.
 13 Q Which other phone calls do you
 14 record?
 15 A For example, one year ago I
 16 received phone calls with threats and I
 17 recorded them, and I used that information to
 18 file a complaint with the Investigative
 19 Committee, those were the threats connected
 20 with my publications.
 21 But the majority of such calls
 22 present from unknown numbers are from people
 23 whose numbers I simply forgot, the numbers
 24 that were not saved in my phone or calls from
 25 people giving information to journalists.

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1 OLEG A. LURIE
 2 These recordings are simply
 3 deleted. That is it.
 4 Q Do you also record in-person
 5 conversations?
 6 A With whom?
 7 Q Yes or no.
 8 A I did not understand. The
 9 question was, do you record in-person
 10 conversation with whom, my wife, with my
 11 children?
 12 Q Have you -- have you recorded
 13 in-person conversations --
 14 A Only if it is connected to my
 15 investigations as a journalist. If it's
 16 important for my journalist activity or if
 17 it's some kind of a provocation.
 18 Q Do you record these in-person
 19 conversations secretly or openly?
 20 A If it's an official interview I
 21 openly record it to use the recording to work
 22 on the material I receive and to,
 23 subsequently, publish it.
 24 If they are threats or
 25 provocations, I sometimes have to record it

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1 OLEG A. LURIE
 2 secretly just to ensure my safety.
 3 Q When is the first time you
 4 secretly recorded an in-person conversation?
 5 A It was a long time ago, maybe 15
 6 years ago.
 7 Q Is it common in Russia to record
 8 conversations?
 9 MR. LEVINE: Object to the form.
 10 A I don't know about others. I can
 11 only speak for myself.
 12 Q Is it permitted by law to
 13 secretly record conversations in Russia?
 14 A If it ensures safety I think
 15 court would understand.
 16 Q Is there a law against it?
 17 A Unfortunately, I'm not a lawyer,
 18 and I don't have a deep understanding of the
 19 laws. Perhaps we would need to consult
 20 lawyers.
 21 Q You said yesterday you use a
 22 phone to record conversations, what kind of
 23 phone do you use?
 24 MR. LEVINE: Object to the form.
 25 A Samsung and an iPhone.

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1 OLEG A. LURIE
 2 Q You use both to record
 3 conversations?
 4 A No, Samsung in the first place.
 5 Q How do you record phone calls on
 6 this Samsung, do you have a program?
 7 A There is an application to be
 8 installed there. I don't know how it's
 9 called, but it's a voice recorder and it's a
 10 large smart phone.
 11 Q Your Samsung is a smart phone?
 12 A Yes. I'm not big expert on the
 13 electronics, but I think, yes.
 14 Q That is fine. Neither am I.
 15 You use this application to
 16 record conversations; is that correct?
 17 A Yes. Yes. Conversation or some
 18 other things that I need to record.
 19 Q How do you start the recording?
 20 A By pressing a button. Just by
 21 pressing a button. And if I need to start the
 22 recording beforehand, I just start the
 23 recording earlier.
 24 Q How do you stop the recording?
 25 A After the conversation is over I

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1 OLEG A. LURIE
 2 just press stop and that is it.
 3 Q So just one button --
 4 A I also want to add, button but
 5 there are no actual, physical, buttons. They
 6 are digital buttons on the screen and I press
 7 those icons.
 8 Q Understood. Is this the phone
 9 that you were using to record conversations in
 10 November 2014?
 11 A I use Samsung.
 12 Q You stated that in November 2014
 13 you received phone calls from someone who
 14 called himself Maxim, do you know if this was
 15 his real name?
 16 A I cannot state anything, because
 17 he did not show his passport or his driver's
 18 license or any other identification documents,
 19 and I didn't see him and I can neither confirm
 20 nor deny that.
 21 Q Do you think it was his real
 22 name?
 23 MR. LEVINE: Object to the form.
 24 A I cannot answer because that
 25 would be an assumption. It might have been

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1 OLEG A. LURIE
 2 his real name. It might have been not.
 3 Q You later spoke with someone who
 4 called himself Vladimir, do you know if that
 5 is his real name?
 6 A Same answer. I did not see his
 7 ID. So it might have been his real name.
 8 Might have been not his real name. Once
 9 again, I have doubts and what I'm saying are
 10 only assumptions.
 11 Q Why do you have doubts?
 12 A I always have doubts, unless I
 13 see documentary proof with my own eyes.
 14 Q You said yesterday that you
 15 recorded your first conversation with Vladimir
 16 by placing your one phone on the table and the
 17 second phone that was recording on a chair,
 18 correct?
 19 A Yes.
 20 Q Was that second phone covered in
 21 any way?
 22 A Why did I have to cover it? I
 23 was at home. I had the phones next to each
 24 other.
 25 Q I'm talking about the meeting

Page 183

1 OLEG A. LURIE
 2 with Vladimir at the restaurant, I believe?
 3 A One phone was on the table and my
 4 second phone was on the chair next to me and
 5 Vladimir was sitting in front of me.
 6 Q The phone --
 7 A And the table was rather small,
 8 so the distance was small.
 9 Q The second phone on the chair,
 10 was that the one recording the conversation?
 11 A Yes, of course.
 12 Q Was that covered in any way?
 13 A No, it wasn't covered in any way.
 14 Q When did you turn the second
 15 phone on?
 16 MR. LEVINE: Object to the form.
 17 A I don't remember exactly. The
 18 phone was ready, it was on pause and I turned
 19 the recording on either as soon as I saw
 20 Vladimir or a bit earlier. I don't know
 21 exactly now. I need to listen to the
 22 recording.
 23 Q When I asked when you turned the
 24 second phone on, I meant when you turned the
 25 recording on?

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1 OLEG A. LURIE
 2 A I turned the recording on as soon
 3 as I saw a person entering the bar or the cafe
 4 -- the bar, heading in my direction and by the
 5 way, I made a mistake the first time, I turned
 6 the recording on but the person went by me or
 7 passed me. Second one I guessed right.
 8 Q When did you return the recording
 9 off?
 10 A I turned it off after we bid
 11 farewell.
 12 Q Did Vladimir express any concerns
 13 that you would record the conversation?
 14 A No, I don't think so. The other
 15 phone was on the table and I think it cleared
 16 his doubts.
 17 Q Why would that clear his doubts?
 18 MR. LEVINE: Objection.
 19 A It's only my assumption.
 20 Q Did you discuss with Vladimir the
 21 fact that the phone on the table was or was
 22 not recording?
 23 A No, we did not. But he saw it,
 24 because I replied -- I read a text message.
 25 Q Sorry. Can you explain that?

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1 OLEG A. LURIE
 2 A When we were having the
 3 conversation and sitting at the table the
 4 phone was on the table, and the screen was
 5 dark, it was in standby mode and when a text
 6 message came I took the phone and checked that
 7 text message and put it back.
 8 So he saw it, and it might have
 9 disbursed his concerns but I'm only assuming.
 10 Q Did you record your second
 11 in-person meeting with Vladimir in the same
 12 way?
 13 A I think yes. Yes.
 14 Q So the first phone was on the
 15 table and the second phone that was recording
 16 was on a chair?
 17 A Either on the chair standing next
 18 to me or on the same chair on which I sat. I
 19 don't remember now.
 20 Q Was anything covering the phone
 21 that second time?
 22 A I don't remember exactly where it
 23 was. It was either on the chair and the chair
 24 was drawn right under the table, or it could
 25 be on my chair and I don't remember exactly.

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1 OLEG A. LURIE
 2 It was not covered in any way. No. Otherwise
 3 the recording would not turn out well.
 4 Q When did you turn the recording
 5 on during that second meeting?
 6 A I don't remember exactly. As
 7 soon as I saw him -- well, yes, as soon as I
 8 saw him I pressed -- I released the pause
 9 button, but I don't remember how it was
 10 exactly.
 11 Q During that first meeting with
 12 Vladimir, you stated that Browder was your
 13 topic including the list, what list were you
 14 referring to?
 15 A Probably Magnitsky List.
 16 Q In that meeting, and you are
 17 welcome to turn to Exhibit 4 of Exhibit A. I
 18 am looking at page five of the English, after
 19 the 10 minute mark.
 20 A Yes, just a second, please.
 21 What is the paragraph?
 22 Q I don't have numbered paragraphs,
 23 but I'm looking just after it says 01000.00.
 24 It looks like page 11 of 15 of the Russian.
 25 A Are we talking about the

Page 187

1 OLEG A. LURIE
 2 transcription or the text?
 3 Q I see. The transcription,
 4 specifically, Exhibit 4?
 5 A What is the time you just said?
 6 Q 10 minutes. Page 11 of 15 in the
 7 Russian.
 8 A Difficult. Are we talking about
 9 the transcription of the first conversation or
 10 the second one?
 11 Q It is the first conversation with
 12 Vladimir, it is Exhibit 4.
 13 A 10:00, right?
 14 Q Yes.
 15 A I found it.
 16 Q So Vladimir says something ending
 17 in, "do you like this scenario", and you say,
 18 "yes, I was enlightened and the previous
 19 publications and my speech in Vesti, the whole
 20 story with Katsyv", do you see that?
 21 MR. LEVINE: Object. It says
 22 "whole story with indiscernible" and
 23 then Katsyv.
 24 MS. GRAHAM: Thank you.
 25 A My publications, my appearance on

Page 188

1 OLEG A. LURIE
 2 Vesti, the whole story with Katsyv.
 3 Q Previous publications, what were
 4 you referring to?
 5 A On Vesti FM I spoke about
 6 Mr. Browder numerous times, outside of this
 7 subject.
 8 Q Is that what you are referring to
 9 when you say my speech in Vesti?
 10 A Yes. That the program on Vesti
 11 about Browder, it says one conversation but
 12 there were several conversations about
 13 Browder, and Browder is a person who was
 14 convicted in Russia and sentenced in absentia
 15 for financial fraud, embezzlement, I believe
 16 he is wanted.
 17 Prior to that I also spoke about
 18 William Browder.
 19 Q To be clear --
 20 A One more thing, I also appeared
 21 on this Vesti FM prior to that and spoke about
 22 my meetings with Magnitsky, and what he told
 23 was a different picture in comparing what
 24 William Browder tried to portray.
 25 Q Is that the appearance on Vesti

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1 OLEG A. LURIE
 2 that you referenced in your Declaration?
 3 A Yes.
 4 Q Is that appearance on Vesti the
 5 speech in Vesti that you referenced in this
 6 conversation with Vladimir?
 7 A Yes. Well, one appearance, as
 8 far as I remember.
 9 Q When you say here "the whole
 10 story with indiscernible Katsyv", what were
 11 you referencing there?
 12 A Okay. First of all, in the media
 13 -- media gave a lot of attention to the story
 14 of Denis Katsyv, and I believe -- due to the
 15 fact that he was the first, falling under
 16 Magnitsky List, and it got a lot of attention
 17 both in the Russian and foreign media.
 18 I read everything connected with
 19 the names of Sergei Magnitsky and William
 20 Browder, because, as a journalist, I was
 21 interested in that.
 22 I don't know the legal side of
 23 the story, but I read about it and I also
 24 wrote about Mr. Baranoski, who was accused of
 25 extortion of money from Denis Katsyv and was

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1 OLEG A. LURIE
 2 sentenced to 14 years of imprisonment due to
 3 his actions. That is why I mentioned that.
 4 Q I see.
 5 Was there a lot written about
 6 Sergei Magnitsky and William Browder?
 7 MR. LEVINE: Object to the form.
 8 A Yes, quite a lot.
 9 Q I would like to draw your
 10 attention to one more part of this
 11 conversation, it's after 11 minutes and 30
 12 seconds. Same page. You say at the end --
 13 A Yes.
 14 Q You say at the end of the
 15 paragraph, "Listen, everything I have been
 16 doing for the past five years, all of that
 17 goes to waste now."
 18 What did you mean by "everything
 19 I have been doing for the past five years"?
 20 A I don't see it. I don't see it.
 21 One second. Yes, I can see it now. Thank
 22 you.
 23 Q When you said, "Everything I have
 24 been doing for the past five years", what did
 25 you mean?

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1 OLEG A. LURIE
 2 A By that I meant personal
 3 investigations, because I wrote a lot about
 4 William Browder and also about medical
 5 assistance provided to Mr. Sergei Magnitsky,
 6 that would constitute changing my position.
 7 Regardless of Sergei Magnitsky or
 8 William Browder, that would mean me quitting
 9 the investigative journalism, the cause I
 10 dedicated all my life to.
 11 When I said five years, I meant
 12 the time after I was released from
 13 incarceration. Well, four years, but maybe I
 14 just made a mistake.
 15 Q In your second conversation with
 16 Vladimir you stated that you had moral
 17 obligations before Magnitsky, what did you
 18 mean?
 19 MR. LEVINE: It would be helpful
 20 if you pointed to the section.
 21 Q Exhibit 5.
 22 A I remember that. Yes. Yes.
 23 Especially, when we are talking about Sergei
 24 Magnitsky.
 25 Q What did you mean by moral

Page 192

1 OLEG A. LURIE
 2 obligations?
 3 A Please, imagine you are in prison
 4 and you have conversation with people and the
 5 person is sincere with you, the person tells
 6 you about his story in great detail, the
 7 person opens his heart and soul to you, and
 8 then that person's life breaks down and he
 9 dies.
 10 I was one of the last people, if
 11 not the last, to whom he opened, and as a
 12 human being I have moral standards and I would
 13 not be able to step over Sergei Magnitsky.
 14 I have moral obligations towards
 15 that person, that is how I understand it. He
 16 was a human being and he died, and I think I
 17 was the last person with whom he opened his
 18 heart.
 19 That is why I have this moral
 20 obligation. And I still have them.
 21 Q Did those moral obligations
 22 toward Sergei Magnitsky include the obligation
 23 to tell his story?
 24 MR. LEVINE: Object to the form.
 25 A Without any doubt, and this story

Page 193

1 OLEG A. LURIE
 2 will be told.
 3 Q Did you tell Nataliya
 4 Veselnitskaya about these conversations with
 5 Maxim and Vladimir?
 6 A Yes, I did.
 7 Q When?
 8 A I don't remember exactly. How
 9 many days later, weeks. I think several weeks
 10 passed after that, but maybe later, maybe
 11 earlier.
 12 Q What did she say when you told
 13 her about this?
 14 A She said that testimony needs to
 15 be given with regard to that. So we should
 16 take testimony, and that is what I did.
 17 Q Testimony needed to be given
 18 where?
 19 A As far as I understood, in court.
 20 But I would repeat that I'm not an expert in
 21 legal matters.
 22 Q Did she ask you to give testimony
 23 about this case in a -- criminal case in
 24 Russia?
 25 A No. I don't know what case. She

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1 OLEG A. LURIE
 2 did not ask.
 3 Q Why did you tell her about these
 4 conversations?
 5 A Because I told her about
 6 Magnitsky, and she told me that she was an
 7 attorney for Mr. Katsyv and working on his
 8 case, and she also gave me interviews as an
 9 expert, and that is why I told her about those
 10 conversations.
 11 Q You said Nataliya Veselnitskaya
 12 asked you not to give any interviews or write
 13 any articles about your conversations with
 14 Maxim and Vladimir, did you agree with this?
 15 A Yes.
 16 Q To this day, have you written any
 17 articles about your conversations with Maxim
 18 and Vladimir?
 19 A Without going into details, I
 20 spoke about that when I participated in
 21 several programs on major TV channels in
 22 Russia.
 23 I mentioned that certainly,
 24 certain individuals approached me and
 25 threatened me, trying to make me to change my

Page 195

1 OLEG A. LURIE
 2 position with regard to William Browder and
 3 Sergei Magnitsky.
 4 I appeared on Vesti and TV,
 5 Russia 1, Russia 24, but I only stated facts
 6 and gave no details.
 7 Q Did you state that these
 8 individuals who had threatened you purported
 9 to represent William Browder?
 10 A I said then, and I'm saying now,
 11 these people told me that they represented
 12 William Browder. I did not know him
 13 personally, and I cannot say anything.
 14 Q When you say "I said then", you
 15 mean you said on these programs on TV channels
 16 that you just described?
 17 A Yes.
 18 Q Thank you. Mr. Lurie we have one
 19 last brief topic.
 20 A Thank you.
 21 THE VIDEOGRAPHER: Time is 3:15
 22 p.m. We are going off the record.
 23 (A short break is taken.)
 24 THE VIDEOGRAPHER: This begins
 25 media unit number four. The time is

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1 OLEG A. LURIE
 2 3:23 p.m. We are back on the record.
 3 Q Mr. Lurie, did you meet with any
 4 lawyers in connection with your testimony at
 5 this deposition?
 6 A Yes, I did.
 7 Q Who is that?
 8 A With Mr. Levine, Mr. Moscow and
 9 Nataliya Veselnitskaya.
 10 Q All together or were those
 11 separate meetings?
 12 A I believe separate. Nataliya
 13 Veselnitskaya was present at the first and the
 14 second meeting.
 15 Q So were there two meetings total,
 16 where you discussed your testimony at this
 17 deposition with lawyers?
 18 MR. LEVINE: Object to the form.
 19 A With Mr. Levine in December of
 20 last year, during that meeting I told him
 21 everything that was reflected in my
 22 Declaration, which was added to this case as
 23 the evidence. It was written from my words.
 24 Q Was that your only meeting with
 25 Mr. Levine?

Page 197

1 OLEG A. LURIE
 2 A Yes.
 3 Q How many meetings did you have
 4 with Mr. Moscow?
 5 A One.
 6 Q How many meetings with Ms.
 7 Veselnitskaya in connection with your
 8 testimony?
 9 A I cannot tell you exactly. Maybe
 10 three, maybe four.
 11 Q What did you discuss in your
 12 meeting with Mr. Moscow?
 13 A I told him what I know and what
 14 was stated in this Declaration.
 15 Q Did you discuss what would happen
 16 at the deposition with any lawyers?
 17 A No. What can happen? I don't
 18 know.
 19 Q Did you discuss depositions, what
 20 happens at depositions, things about --
 21 withdrawn.
 22 Did you discuss the need for you
 23 to testify at a deposition with any lawyers?
 24 A I find it difficult to answer,
 25 but according to the Russian law, if person

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1 OLEG A. LURIE
 2 knows something the person has to testify and
 3 I proceed from that.
 4 Q Well, did you discuss the facts
 5 that you were being asked to testify in this
 6 case with any lawyers?
 7 A No. To me it was a fact. It was
 8 a civil duty to testify with regard to the
 9 case. I know something and moral obligations.
 10 Q You showed up yesterday for a
 11 deposition, how did you know when and where to
 12 appear?
 13 A Nataliya Veselnitskaya informed
 14 me about that over the phone.
 15 Q What, if anything, did she tell
 16 you about what would be happening yesterday?
 17 A No. And, honestly, I'm doing it
 18 for the first time and I was told to just sit
 19 down here and to talk.
 20 Q Was there any further explanation
 21 of how this process would work?
 22 A When I arrived at the law office
 23 from which we are broadcasting, one of the
 24 employees of the law office described the
 25 technical side of the procedure.

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1 OLEG A. LURIE
 2 Q Have you spoken with any lawyers
 3 yesterday or today about your deposition?
 4 A No.
 5 Q You haven't spoken to any lawyers
 6 on the break about your deposition?
 7 A No, I did not and I don't have an
 8 attorney here.
 9 Q You understand when I say
 10 "lawyers", I mean not necessarily your lawyer,
 11 but lawyers generally?
 12 A No. I did not discuss it with
 13 any lawyers.
 14 Q Did anyone ask you to come to the
 15 United States to testify in this case?
 16 A Yes. Nataliya Veselnitskaya
 17 called me and she said that it's possible that
 18 I might be called to testify in the United
 19 States and, naturally, I agreed.
 20 But later she told me there was
 21 no need for me to fly to the United States,
 22 because it was possible to do it the way we
 23 are doing it now.
 24 Q The recordings that we listened
 25 to yesterday of your conversations with Maxim

Page 200

1 OLEG A. LURIE
 2 and Vladimir, do you know how Defense Counsel
 3 obtained those?
 4 MR. LEVINE: Object to the form.
 5 A Yes, of course.
 6 Q How did they get them?
 7 A I copied it from my cell phone to
 8 a flash drive and gave it to them.
 9 Q Gave it to whom?
 10 A Gave it to Nataliya
 11 Veselnitskaya, who, as far as I understand,
 12 gave it to the attorneys.
 13 Q Did Nataliya Veselnitskaya ask
 14 you to do that?
 15 A No, it was my own initiative.
 16 Q Did you copy all the files of
 17 your conversations with Maxim and Vladimir to
 18 the flash drive?
 19 A Absolutely, all.
 20 Q Did you make any alterations to
 21 those files when you copied them to the flash
 22 drive?
 23 A No.
 24 Q Did you give copies of these
 25 recordings to anyone else?

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1 OLEG A. LURIE
 2 A No.
 3 Q The Samsung that you used to make
 4 these recordings, do you have that phone on
 5 you now?
 6 A No. I gave it to Nataliya
 7 Veselnitskaya, in presence of the lawyers and
 8 she sealed it and she applied a stamp on it.
 9 Q You are referring to the Samsung
 10 phone that you made the recordings on?
 11 A Yes.
 12 Q You said in the presence of
 13 lawyers, which lawyers were present?
 14 A As far as I remember, I think
 15 Paul Levine was present.
 16 Q Where did this take place?
 17 A It took place in the offices of
 18 Cornerstone Law Office, headed by Nataliya
 19 Veselnitskaya.
 20 Q Do you know who kept the Samsung
 21 phone after it was -- after the bag was sealed
 22 and stamped?
 23 A I think it was kept by Nataliya
 24 Veselnitskaya, but this is a question for her.
 25 MS. GRAHAM: We can go off the

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1 OLEG A. LURIE
 2 record briefly.
 3 THE VIDEOGRAPHER: The time is
 4 3:39 p.m. We are going off the record.
 5 (A short break is taken.)
 6 THE VIDEOGRAPHER: The time is
 7 3:44 p.m. We are back on the record.
 8 MS. GRAHAM: The Government has
 9 no further questions. Thank you.
 10 A Thank you.
 11
 12 CONT'D EXAMINATION BY MR. LEVINE:
 13
 14 Q Mr. Lurie, it is Mr. Levine
 15 again. I have a few follow-up questions for
 16 you.
 17 How much compensation -- strike
 18 that.
 19 How much income have you earned
 20 regarding any interaction you had, personally,
 21 with Sergei Magnitsky?
 22 MS. GRAHAM: Objection to form.
 23 A No income at all. What income?
 24 Q Have you earned any income from
 25 any articles that may have been published

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1 OLEG A. LURIE
 2 regarding your personal interactions with
 3 Sergei Magnitsky?
 4 MS. GRAHAM: Objection to form.
 5 A No income, because, like I said,
 6 it is a question of principles and morals.
 7 Q Do you earn any income from your
 8 live journal blog?
 9 A No. I do not receive income. It
 10 is not mass media.
 11 Q You wrote in your Declaration
 12 that you gave written testimony, was there a
 13 court reporter present?
 14 MS. GRAHAM: Objection to form.
 15 A No.
 16 MR. LEVINE: Subject to any
 17 additional questions, I have nothing
 18 further but we shouldn't go off the
 19 record just yet.
 20 MS. GRAHAM: No additional
 21 questions. Thank you, Mr. Lurie.
 22 THE WITNESS: Thank you.
 23 MR. LEVINE: Mr. Lurie, under the
 24 American Federal Rules of Civil
 25 Procedure you have a period of time to

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1 OLEG A. LURIE
 2 read and sign your deposition if you so
 3 choose, to correct errors in the
 4 transcription, unless you waive that
 5 right on the record. That is something
 6 for you to determine on your own.
 7 THE WITNESS: Should I answer --
 8 should I give an answer right now or I
 9 have time to think, but I'm not
 10 familiar --
 11 MR. LEVINE: That is for you to
 12 decide, Mr. Lurie.
 13 THE WITNESS: So I can tell you
 14 about my decision after a certain period
 15 of time, correct?
 16 MR. LEVINE: Sure.
 17 THE WITNESS: Thank you.
 18 MR. LEVINE: Otherwise the
 19 deposition is closed?
 20 MS. GRAHAM: Correct.
 21 THE VIDEOGRAPHER: The time is
 22 3:49 p.m. October 9, 2015. This
 23 completes today's deposition.
 24 (Deposition was concluded at 3:49
 25 p.m.)

Page 205

1
2 J U R A T
3
4 I DO HEREBY CERTIFY that I have
5 read the foregoing transcript of my deposition
6 testimony.
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11 SWORN TO AND SUBSCRIBED
12 BEFORE ME THIS
13 DAY OF 2015
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Page 207

1
2 C E R T I F I C A T E
3
4 I, CAROLYN CHEVANCE, a Notary
5 Public of the State of New Jersey, do hereby
6 certify that prior to the commencement of the
7 examination OLEG A. LURIE was duly sworn by me to
8 testify the truth, the whole truth and nothing
9 but the truth.
10
11 I DO FURTHER CERTIFY that the
12 foregoing is a true and accurate transcript of
13 the testimony as taken stenographically by and
14 before me at the time, place and on the date
15 hereinbefore set forth.
16
17 I DO FURTHER CERTIFY that I am
18 neither a relative nor employee nor attorney nor
19 counsel of any of the parties to this action, and
20 that I am neither a relative nor employee of such
21 attorney or counsel, and that I am not
22 financially interested in the action.
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25 _____
Notary Public of the State of New Jersey
Dated: October 12, 2015

Page 206

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