

1 WILLIAM F. BROWDER (4/15/15)

2 A. No.

3 Q. Who filed the tax returns?

4 A. Some other employees of Firestone
5 Duncan.

6 Q. When you say he was working on it,
7 what was he doing it?

8 A. When -- there was a challenge in
9 the court over -- over the tax payments, so he
10 represented us in court.

11 Q. And he never had a power of
12 attorney from you to do the tax returns?

13 A. Not in 2001, not that I'm aware of.

14 Q. How about in 2002?

15 A. I don't think so, but I --

16 Q. 2003?

17 A. I don't know.

18 Q. How about 1999?

19 A. I don't know.

20 Q. Who came up with the idea that you
21 could use this tax regime?

22 A. This was a common market practice.
23 There was more than 15,000 companies
24 registered in Kalmykia doing this, and this
25 was -- we were advised by Arthur Andersen,

1 WILLIAM F. BROWDER (4/15/15)

2 Firestone Duncan, Ernst & Young and various
3 other firms that this was a proper way of
4 organizing our affairs.

5 Q. But the courts in Kalmykia didn't
6 agree with you, correct?

7 MR. KIM: Objection to form.

8 A. There was -- there was -- they did
9 and they didn't.

10 MR. CYMROT: So let's have Tab 38.

11 All right. I'm marking as Browder
12 Exhibit 3 a Decision No. 205,
13 February 26, 2003; Case
14 No. A22-1022/02/6/105.

15 Q. I'm handing you the English, and I
16 think the Russian is attached on the back.

17 (Browder Exhibit 3, document Bates
18 stamped BrowderDepo0001471 through
19 '477 was marked for identification, as
20 of this date.)

21 BY MR. CYMROT:

22 Q. So have you seen this decision
23 before?

24 A. No.

25 Q. Were you informed of it?