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When you told people

7 Mr. Magnitsky's a lawyer, did you also tell

8 them he never went to law school and never had

9 a law license?

10 A. I'm sorry. I . . .

11 Q. When you tell -- how many times
12 have you said, "Mr. Magnitsky is a lawyer"?

13 A. I don't know.

14 Q. 50? 100? 200?

15 A. I don't know.

16 Q. Many, many times, right?

17 A. Yes.

18 Q. Have you ever told anybody that he
19 didn't go to law school and didn't have a law
20 degree?

21 A. No.

22 Q. Did you tell them that he was
23 working for you for many years and he was
24 working capa- -- in capacities other than
25 legal?

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

2 A. Yes.

3 Q. Did you tell these gentlemen over
4 here that?

5 A. Yes.

6 MR. CYMROT: And I was pointing
7 Mr. Monteleoni.

8 Q. All right. Let's go to the
9 Complaint.