

LAW PARTNERSHIP

(G&P logo)

“GAUF AND PARTNERS”

to Mr R.R. Burganov

Lawyer's inquiry

By me, lawyer V.N. Krasnov, registration number 77/7810, in the procedure established by law is being implemented the defence of citizen Platon Leonidovich Lebedev in criminal case No.18/432766-0707.

Pursuant to Art.86 para3(3) CCP RF, a lawyer shall have the right to gather evidence necessary for rendering the client legal assistance, while according to Art.6 Federal Law «On the Advocacy and the Bar», - among others by way of the polling [*sic*] with their approval of persons presumably possessing such information, obtaining from them the corresponding documents and clarifications.

From the materials of the indicated criminal case, as this follows from information publicly disseminated by the Procuracy-General of the RF, it is known that P.L. Lebedev is being charged, among other things, with involvement in the supposedly illicit exchange of shares in the subsidiary enterprises of OAO «VNK» for shares in OAO «NK YUKOS» in November 1998 within the composition of a so-called «organised group». It is known likewise that these contracts in the name of OAO «VNK» were signed by you.

In connection with what is set forth above, I ask you to clarify the following:

1. What is known to you about the participation of P.L. Lebedev in the preparation and the carrying out of the indicated share swap transactions?
2. Taking into account that the investigation reckons you, the same as P.L. Lebedev as well, in the so called «organised group», within the composition of which you in complicity with my client and other persons had supposedly committed the misappropriation (theft) of shares in the subsidiary enterprises of OAO «BNK» [*sic*], what is known to you, if it is known, about the time, place of founding, organiser(- s) and composition of this so-called «organised group»? Were you aware that, signing the share swap contracts indicated above, you were acting as a member of this so-called group, implementing supposedly a single criminal intent in conjunction with others of its members, including with P.L. Lebedev?

Lawyer

(signature)

V.N. Krasnov

22 February 2008

Ramil Raisovich Burganov, 01 January 1961 year of birth

To your Lawyer's inquiry of 22 February 2008 I voluntarily clarify.

1. On the strength of the authority granted me by power of attorney from ZAO «Rosprom», being the management company of OAO «VNK», on the basis of a decision of the Board of directors of ZAO «Rosprom» of 3 November 1998, which was for me mandatory, by me indeed from specifically OAO «VNK» were signed the contracts that interest you for the swap of shares in its subsidiary enterprises for shares in OAO «NK YUKOS». These contracts were in the order established by the internal policies and procedures of ZAO «Rosprom» coordinated and initialled by the corresponding official persons. The objective of these transactions was the protection of the assets (shares) of OAO «VNK» from the non-amicable and, as subsequent court decisions showed, unlawful capture thereof by the company «Birkenholz S.A.». The contracts envisioned the return of the shares in the subsidiary enterprises to OAO «VNK», which is what was carried out after the elimination of the indicated threat.

In that which concerns P.L. Lebedev, I personally was not acquainted with him, although, of course, I knew of him as of one of the managers of KB «Menatep» and MFO «Menatep». Any indications whatsoever with respect to share swap transactions I did not get from him, these questions with him I did not discuss and never had I heard from anyone that P.L. Lebedev had anything whatsoever to do with them.

2. In that which concerns the so-called «organised group». During the course of the preliminary investigation I clarified and confirm this yet again, that about the presence of an organised group and my supposed membership in it I found out from the investigators and from publications in the mass information media. Nobody had ever drawn me into the composition of any «organised group», did not tempt and did not compel to the commission of any crimes. I did not have any «criminal intent» whatsoever, including in conjunction with P.L. Lebedev, in the share swap transactions.

In connection with what has been set forth above, nothing about the time and place of the founding, the composition, objectives and leadership of this so-called «organised group» is known to me.

Signature
(signature)

Date
(date)