

In the Competent Authorities of The Russian Federation
In the Competent Bodies of United Nations Organization
In the Competent Authorities of the European Commission
In the Competent Authorities of the United Kingdom
of Great Britain and Northern Ireland
In the Competent Authorities of the
United States of America

Under the United Nations Convention against corruption, adopted by the General
Assembly by Resolution 58/4, 31 October, 2003

and

The Criminal Law Convention on Corruption, Strasbourg, 27 January, 1999 as
amended by the Lisbon Treaty, 1 December, 2009

and

The Civil Law Convention on Corruption, Strasbourg, 4 November, 1999 as
amended by the Lisbon Treaty, 1 December, 2009

and other anti-corruption statutory Acts as applicable

A PETITION FOR AN INVESTIGATION INTO INTERNATIONAL CORRUPTION CASE

This Petition Is To Request A Special Investigation Of Allegedly Illegal Payments
as Made In Extortion By Or To Bribe The Allegedly Corrupt Government
Officials.

Under provisions of International Anti-Corruption Treaties and conventions law
enforcement agencies have authority to take action if there is a pattern or practice
of illegal conduct.

We remain of abiding concern that all cases of bribery, extortion and other
criminal aspects of corruption shall only be effectively fought against if
prosecuted with an international dimension. Having this in mind we urge
competent authorities to investigate into alleged anti-corruption legislation
violation.

SUMMARY IN BRIEF

It has recently come to public light that Chalva Tchigirinsky, a Russian
entrepreneur has claimed in the High Court of Justice, London that the wife of the
Moscow mayor, Yelena Baturina, secretly held 50 per cent of his stake in Sibir
Energy company and his property businesses in return for assisting him with
"bureaucratic issues".

In the filing, Mr Tchigirinsky's lawyer claimed that his client entered into partnership with Ms Baturina in 1999 to boost his business interests in Moscow because "no major projects can proceed in the city without her backing".

While Mr Tchigirinsky was to provide the finance for his property and oil business, Ms Baturina "was to ensure that any planning or other bureaucratic issues did not get in the way".

Mr Tchigirinsky also claimed he spent about \$12m on Ms Baturina's behalf, including bills for maintaining her private jet.

According to the witness statement, the partnership's profits and losses were to be split evenly between Ms Baturina and Mr Tchigirinsky. The arrangement was formalised in 2003 when two British Virgin Island companies, Rossini and Salvini, were created to hold Ms Baturina's 50 per cent stakes in the oil and property businesses.

It is known that these documents were filed as part of the case purport to show Ms Baturina's and Mr Tchigirinsky's signatures on the corporate founding documents.

It is specifically worth to mention that in 2007 Moscow City government took an 18 per cent stake in Sibir. (this compilation as cited by text published by Catherine Belton in Moscow, Financial Times, July 13, 2009)

SUMMARY EXPLAINED

I. EXTORTION OR BRIBERY ALLEGATION

- (a) We claim that that a corporate offshore veil be lifted and the whole case be thoroughly investigated including, as the case may be, any acts of complicity, for example, the instigation by a person or a company of a corruption offence even committed by or via a local branch abroad;
- (b) It is also alleged by the present that Mr. Tchigirinsky could have been extorted to deprivation of his property;
- (c) The latter allegation is based upon the fact that the alleged extortion could have been be made in the form of obtaining of property from another, even upon his consent, *well but induced by wrongful use of actual or threatened force, violence, or fear, or under color of official right. Which facts could potentially be produced from Mr. Tchigirinsky's statement as cited above;*
- (d) Although Mr. Tchigirinsky may be the victim of extortion, we are aware that he might be reluctant to report the crime out of fear that the corrupt local Russian law enforcement agencies will rather believe the bribe story, rather than the true extortion story, and charge the claimant with bribery;
- (e) We claim and petition that a thorough investigation be made into suspicion that all the acts described might have constituted extortion because the alleged threat resulted (or was intended to result) in the victim's consent to depart with *very valuable property or rights for no visible consideration.*

II. CONSPIRACY AGAINST THE INTERNATIONALLY RECOGNIZED CONSTITUTIONAL RIGHTS

- (a) We hold it though it is unlawful for two or more persons to agree together to injure, threaten, or intimidate a person in any state or territory in the free exercise or enjoyment of any right or privilege secured to such person by internationally recognized Constitutional rights to enjoy entrepreneurial activities through the property rights or otherwise;
- (b) It is our primary assumption that Mr. Tchigirinsky's statement may contain facts that need be investigated in the said context for the sake of constitutional rights and public order.

III. SUMMARY PETITION

In the circumstances, we therefore urge you to use your good offices to cause investigation into the allegation in the followings terms:

1. Confirm the actual and total payments made by Mr. *Chalva Tchigirinsky* to the account of Mrs. Yelena Baturina either directly or through affiliated entities;
2. Investigate the veracity of the allegations of corruption made by Mr. Tchigirinsky, against Yelena Baturina in both her individual private capacity and/or in her capacity of the allegedly fraud or racketeer company;
3. Ensure that the said Mrs. Yelena Baturina and/or company as owned or controlled by her refund what allegedly has been illegitimately collected;
4. Bring the Rule of Law i.e. ascertain whether any extant laws have been violated, by whom and punish the culprits accordingly;
5. Prosecute anybody found wanting in your investigation and ensure that the money dubiously collected and/or misappropriated is safely returned to their respective owners and all illegal proceeds of crime be confiscated and/or otherwise attached.

We urge you to immediately cause the investigation accordingly, to take recourse to the relevant courts as well as embarking on any appropriate civil/or criminal action as may deem necessary to ensure that Public demands are well met.