

**EXHIBIT 6**

# OPUS 2

## INTERNATIONAL

Petr Aven, Mikhail Fridman and German Khan v Orbis Business Intelligence  
Limited

Day 2

March 17, 2020

Opus 2 International - Official Court Reporters

Phone: +44 (0)20 3008 5900

Email: [transcripts@opus2.com](mailto:transcripts@opus2.com)

Website: <https://www.opus2.com>

1 whether Mr Steele was responsible for the document  
 2 entering the public domain. That's not something you  
 3 can give direct evidence on.  
 4 But at 37 in your witness statement {C/1/9}, you  
 5 suggest that the problem with the memorandum is that it  
 6 got the attention of the media in the West; yes?  
 7 A. Yeah.  
 8 Q. Where you're trying to carry on business more now than  
 9 you were ten years ago?  
 10 A. Probably, yes.  
 11 Q. And it contains, you say, specific allegations about you  
 12 specifically ?  
 13 A. That's correct.  
 14 Q. But now, at the conclusion of this cross-examination,  
 15 you would agree with me, would you not, that there has  
 16 been, and had been before this memorandum was released  
 17 by BuzzFeed, a very large amount of publicity about you  
 18 in the mainstream media in the West over the years; yes?  
 19 A. True.  
 20 Q. And some of that contains very serious allegations  
 21 against you and Alfa and about how you made your money,  
 22 doesn't it?  
 23 A. Unfortunately, you're right.  
 24 Q. And some of it accuses you of making large amounts of  
 25 money, huge amounts of money improperly, with the

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1 knowing assistance of successive Russian governments.  
 2 That's one of the charges that has been levelled against  
 3 you.  
 4 A. Probably, yes.  
 5 Q. {D/85/1}, please. This is one of your documents that  
 6 you have disclosed in this case. It's an email just  
 7 after the -- at the time of the BuzzFeed publication  
 8 from somebody called Stuart Bruseth, who is director of  
 9 communications at LetterOne; yes?  
 10 A. Yeah.  
 11 Q. No reason why you should remember the document. You  
 12 remember the period after the BuzzFeed publication?  
 13 A. Yeah.  
 14 Q. So just have a look at the email he's sending you.  
 15 A. Yeah.  
 16 Q. It is right, isn't it, that he was able to advise you  
 17 and assist you to respond to the BuzzFeed publication in  
 18 the media and to rebut the suggestions in the  
 19 memorandum? Yes?  
 20 A. Correct.  
 21 Q. And you had considerable resources to enable you to do  
 22 that, including professional expertise of the sort  
 23 that's being offered here; yes?  
 24 A. Yeah.  
 25 Q. And he's telling you in this email what the line is to

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1 be in response and rebuttal in the media if you're asked  
 2 about this; yes?  
 3 A. Yeah.  
 4 Q. And there are other documents in your disclosure, both  
 5 before and after the BuzzFeed publication.  
 6 A. Correct.  
 7 Q. In the three claimants' disclosure.  
 8 A. Correct.  
 9 Q. I don't want to go through it all, which show that this  
 10 is a familiar path for you to tread, using  
 11 communications experts, to deal with the media, to  
 12 respond and rebut, if appropriate, through your own  
 13 comments with the benefit of professional advice?  
 14 A. Right.  
 15 Q. Yes?  
 16 A. Correct.  
 17 Q. Something you take a lot of care about?  
 18 A. Yeah.  
 19 Q. In your witness statement at paragraph 40 {C/1/9} you  
 20 say -- I don't question the underlying facts -- that  
 21 in March 2017, the US Committee on Foreign Investment  
 22 became concerned about an oil and gas investment in  
 23 Texas, about your involvement in that, and you're trying  
 24 to suggest that the reason for that was BuzzFeed's  
 25 publication of the memorandum. Is that right?

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1 A. Yeah, I think the circumstances -- I don't know exactly,  
 2 but it seems to me the circumstances, that's the fact.  
 3 Q. Rather than any other material the Committee on Foreign  
 4 Investment had about you --  
 5 A. Yeah.  
 6 Q. -- that they might have thought was relevant to their  
 7 decision-making?  
 8 A. I suggest, yes.  
 9 Q. Do you have any evidence of that, that that was what  
 10 determined that decision, rather than other  
 11 considerations?  
 12 A. Yeah, I have certain set of facts which actually I made  
 13 the suggestion very kind of realistic, because we got  
 14 permission from American authority to invest in the US,  
 15 literally couple of months before, for our other  
 16 investment, and after this publication, we been rejected  
 17 in investment in Texas. So it was in a few months from  
 18 the same agency they have got different answer.  
 19 Q. In different cases?  
 20 A. Different cases, but -- it's different businesses, but  
 21 it was the same owner, the same investor. So we didn't  
 22 care about us as investor, didn't worry about us few  
 23 months ago, and suddenly we started to be quite cautious  
 24 regarding us as investor.  
 25 Q. But do you know what else they looked at --

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1 (Pause)  
 2 A. Yeah.  
 3 Q. Just finish it, over the page, next page, top of the  
 4 next page {D/40/31}. Go back to the previous page  
 5 {D/40/30}.  
 6 A. Uh-huh.  
 7 Q. This discusses a report of a special commission set up  
 8 by the Gaidar-Yeltsin government to investigate  
 9 corruption and abuse of power, doesn't it?  
 10 A. No. It was specifically -- report, it was done  
 11 specifically search for Communist Party money abroad.  
 12 Kroll was hired -- (inaudible) contact was Kroll, it was  
 13 hired specifically in search for Communist Party money  
 14 abroad.  
 15 Q. I am putting to you what is reported in the book; do you  
 16 understand?  
 17 A. It's completely untrue.  
 18 Q. We'll come to that in a moment. Take it stage-by-stage.  
 19 What is reported in the book:  
 20 "... that a special commission be established by the  
 21 procurator general to investigate corruption, abuse of  
 22 power, and economic offences."  
 23 And that there was a report presented to the Supreme  
 24 Soviet in September 1993. That is what is being  
 25 reported here. Do you accept that there was

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1 a commission set up that reported --  
 2 A. This be -- this were Kroll or some commission by  
 3 Supreme, maybe there was a commission, maybe.  
 4 Q. Yes.  
 5 A. Yes.  
 6 Q. And the background was investigation by Kroll, wasn't  
 7 it?  
 8 A. I don't know.  
 9 Q. It says Mr Yeltsin was receiving monthly updates from  
 10 Kroll.  
 11 A. He did not.  
 12 Q. At the bottom of page 19, in the last five lines, you're  
 13 criticised, aren't you? {D/40/30}  
 14 A. I am. I see it.  
 15 Q. By implication; by Dawisha referring to you being  
 16 criticised by the commission in its report?  
 17 A. Uh-huh. Yes, I see it.  
 18 Q. "... the document recounted widespread instances of  
 19 'bribery of officials, blackmail, and the illegal  
 20 transfer of currency resources to foreign banks ..."  
 21 A. It's said in the book.  
 22 Q. But you don't agree with any of that?  
 23 A. I'm the only one who has in my hands Kroll report.  
 24 I have it. I have Kroll report. I have Kroll report.  
 25 I have Kroll report. It gets nothing to do with what's

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1 said in this book. It has nothing to do with me. It  
 2 was completely false. Here it's completely untrue.  
 3 I have it in English and in Russian.  
 4 Q. I think what this is referring to is the special  
 5 commission's report?  
 6 A. But you say this is based on Kroll report. I have Kroll  
 7 report in my hands. The commission didn't see the  
 8 report.  
 9 Q. I want to ask you about Mr Putin's time in  
 10 St Petersburg. The public or general understanding is  
 11 that Mr Putin had retired from the KGB in around 1990  
 12 and through acquaintanceship with Mr Sobchak, then the  
 13 Mayor of St Petersburg, went to work in his  
 14 administration. Is that correct?  
 15 A. I know this only from newspapers. I don't know how they  
 16 met and when they met. That, I don't know this story.  
 17 Q. You never discussed that with Mr Putin?  
 18 A. Never. Never.  
 19 Q. At your paragraph 13 you say you first met him {C/2/3},  
 20 subject to the clarification that you have just given  
 21 us, in 1991 when he was head of the committee for  
 22 external relations in Mr Sobchak's office?  
 23 A. Yes.  
 24 Q. But you have recalled now that you met him shortly  
 25 before that?

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1 A. Yes. Yes, I met him two weeks before I was appointed.  
 2 Q. One of the other problems at that time is identified in  
 3 the Dawisha book at {D/40/2}. Could we get that up,  
 4 please. Can you read -- we need to expand it. It's the  
 5 bottom of the left-hand page, 106. Can you read that?  
 6 A. 106?  
 7 Q. The left-hand page.  
 8 A. Mm hmm.  
 9 Q. About 13 lines up from the bottom.  
 10 A. Mm hmm.  
 11 Q. Read down to the bottom. It describes food shortages,  
 12 but also shortages of cash used to pay for food imports,  
 13 so that barter arrangements were used. Do you agree?  
 14 A. It was some sort of barter agree -- yeah, that was -- at  
 15 that time barter was common in Russia. That was  
 16 a barter arrangement, that's right.  
 17 Q. And then if we go to the next page {D/40/3}. On the  
 18 left-hand side, about six lines down, after the  
 19 description of the Salve commission --  
 20 A. Mm hmm.  
 21 Q. -- beginning:  
 22 "Before that, the legal authority ..."  
 23 A. Mm hmm.  
 24 Q. Just read down to the middle of the page.  
 25 A. Yeah, I read it.

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