

UNITED STATES DEPARTMENT OF JUSTICE
BEFORE THE
IMMIGRATION AND NATURALIZATION SERVICE & THE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
ARLINGTON, VIRGINIA

IN THE MATTERS OF)	
)	
ALEXANDRE P. KONANYKHINE)	INS File Nos. A74 361 122; A74 827 707
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&)	
)	
GREATIS USA)	EAC-94-129-51129
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DECLARATION OF NIKOLAI MENCHUKOV

I, Nikolai Menchukov, first being duly sworn, swear under penalty of perjury that the following is true:

- [1] This affidavit sets forth what I told the Immigration and Naturalization Service (INS) Assistant District Counsel, Antoinette Rizzi, when I met with her at the INS on July 11, 1996.
- [2] I am the President of the parent company of Greatis USA, A/O Greatis, which has been referred to as "Greatis Russia" during these proceedings. Greatis Russia is a well-established Russian advertising agency. My many years as President of Greatis Russia has earned me recognition and respect in the Russian business community.
- [3] I reviewed with Ms. Rizzi documents submitted by the INS to the Immigration Court. These documents allegedly show that Greatis USA is not owned by Greatis Russia, and that Mr. Konanykhine allegedly never worked for Greatis Russia, as well as other allegations of fraud against Mr. Konanykhine and Greatis USA. I advised Ms. Rizzi that the INS evidence against Mr. Konanykhine is fraudulent, false, and clearly was concocted by Russian Military Prosecutor Alex Volevodz. I must add that I told Ms. Rizzi I also reviewed again the documents submitted to the INS by Greatis USA and Greatis Russia in support of Mr. Konanykhine's visa applications, and the information provided there to the INS is true and correct.
- [4] The alleged evidence from Greatis Russia which purports to show Mr. Konanykhine never worked for Greatis Russia and that he is not a representative of Greatis Russia abroad, and the letters from Greatis Russia which purport to show that Greatis USA is not

owned by Greatis Russia, all were signed by A. P. Rudakov. I told Ms. Rizzi that Rudakov is not now, nor has he ever been, an employee of Greatis Russia. Moreover, the seal of Greatis Russia Rudakov affixed to the letters offered into evidence by the INS are only lawful if placed on a Greatis Russia letterhead by me or the company's Chief of Accounts. I also called Ms. Rizzi's attention to the fact that Rudakov's letter dated April 12, 1996 (INS Exhibit H) was written allegedly in response to an inquiry "dated April 5, 1996, registration NO. 90 0031-94G" from Volevodz. I told Ms. Rizzi that I was in Russia working at Greatis Russia until I left for the United States on business on April 10, 1996. Therefore, any inquiry from Volevodz, with whom I am acquainted, should have been addressed to me. The dates and sequence of these correspondences also show that this letter of April 12 purposely was not directed to me, and that its transmittal was withheld until I left Russia on April 10. It is also note worthy that the postal registration number on this letter indicates that Volevodz's letter was registered in 1994, not 1996.

- [5] In my meeting with Ms. Rizzi I also showed her articles about Greatis Russia from the Russian business press which confirm that I have long been the President of the company and which discuss Greatis Russia's business activities in the United States and Hungary. Mr. Konanykhine was responsible for those activities, and he remains responsible for the activities of Greatis USA. It is curious that Volevodz alleges that Greatis Russia does not have a U.S. subsidiary in light of these articles and the Greatis USA corporate documents which confirm that Greatis Russia owns all outstanding shares of Greatis USA.
- [6] I reviewed with particular interest INS Exhibit L, a document prepared by Volevodz. I told Ms. Rizzi that in my view, this document confirms what is long been known to me and others in Russia's business community: Volevodz will stop at nothing, including the manufacturing of false evidence, to "get" Alexandre Konanykhine at the behest of Russian criminal elements, which unfortunately, use bribery and intimidation and the Russian legal system to settle personal and financial disputes and to extort money from business people. I further advised Ms. Rizzi that it is my view that Volevodz now is associated with the "SOLNTSEVSKAYA" criminal organization which kidnapped Mr. Konanykhine in Hungary and attempted to extort funds from him. In fact, I first met Volevodz when he was investigating Mr. Konanykhine's complaint to the Russian authorities about that incident because the criminals who attempted to extort money from Mr. Konanykhine were with the Russian KGB. Volevodz approached me about Mr. Konanykhine because at the time Mr. Konanykhine was working with Greatis Russia, and it was Volevodz's responsibility to investigate Mr. Konanykhine's complaint. Interestingly, Volevodz told me when we spoke that his investigation to that date indicated that Mr. Konanykhine's allegations were true and that he would bring the culprits to justice. It is apparent that those being investigated by Volevodz bribed him to persecute the victim, Mr. Konanykhine. Moreover, he called me at my office two years ago and I met him at his office. If he could find me then, why not in 1996?
- [7] I also brought to Ms. Rizzi's attention the fact that Rudakov is associated with the company which provides security at Greatis Russia. Although this may sound unusual to persons unacquainted with the rampant crime and corruption in Russia, almost all

substantial companies have an elaborate security force whose responsibilities include negotiating with criminal elements to minimize extortion and bribes. Those who provide security at my company convince me that Rudakov's presence was necessary for that purpose. Although Rudakov has been "around" Greatis Russia since December, 1995 he has never been and he is not Greatis Russia employee. In light of Rudakov's shady background, I am not surprised that Volevodz used him to produce fraudulent documents from Greatis Russia.

- [8] I further advised Ms. Rizzi that it is well-known in Moscow that Greatis Russia has been recognized for some time as one of the top two advertising agencies in Russia. It is also well-known that Mr. Konanykhine worked with Greatis Russia in a very senior capacity for more than one year before coming to the United States to work with Greatis USA. Unfortunately, it is also well-known in Russian that organized crime and corruption are so pervasive in Russia that Volevodz's ability to use the legal system to persecute Mr. Konanykhine, although obviously reprehensible, is not surprising.
- [9] Although I am in the United States because I have important business in Burbank, California related to the production of cartoons in which I have invested, I am available to testify in Immigration Court for Mr. Konanykhine.



Nikolai Menchukov
President
A/O Greatis

subscribed and sworn to before me this 12th day of July, 1996.

Signature of Notary Judith A. McArthur My Commission Expires _____

JUDITH A. McARTHUR
NOTARY PUBLIC DISTRICT OF COLUMBIA
MY COMMISSION EXPIRES MARCH 31, 2000