

**WITNESS STATEMENT**

(CJ Act 1967, s.9; MC Act 1980, ss.5A(3) (a) and 5B; Criminal Procedure Rules 2005, Rule 27.1)

Statement of: HUNTER, KEITH LINDSAY

Age if under 18: OVER 18 (if over 18 insert 'over 18') Occupation: CHIEF EXECUTIVE OFFICER

This statement (consisting of 11 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it, which I know to be false or do not believe to be true.

Signed: K HUNTER

Date: 05/12/2013

Tick if witness evidence is visually recorded  (supply witness details on rear)

I make this statement in connection with the investigation being conducted by the Metropolitan Police Service (MPS) into the death of Alexander LITVINENKO. I have been asked by DC Steve CHALLICE of the Metropolitan Police SO15 Counter Terrorism Command to provide information on a number of topics relevant to his investigation. I am a former Metropolitan Police Officer who left the police force in 1997 having served for 19 years and attained the rank of Detective Sergeant. During the course of my career I conducted both proactive and reactive policing investigations. Prior to my resignation I was a member of the Regional Crime Squad where I was tasked with the investigation of serious and complex crime which had a national and international dimension. I was experienced in dealing with confidential informants and recognise the benefits of source handling. When I left the MPS I sought employment in the field of security investigations. In January 2000 I set up a company called ISC Global UK Limited with partners Nigel BROWN and Stephen CURTIS. Stephen sadly died in a helicopter crash in 2004. In 2005 I rebranded my company following a split from my business partner Nigel BROWN and formed a new company called RISC Management Limited which remained in the same office premises at 1, Cavendish Place, London, W1G0QF. RISC Global was an anti-money laundering investigation company which at the end of 2005 was operated by the then Managing Director and Operation Director Mr Cliff KNUCKEY. RISC Global was absorbed into RISC Management at the beginning of 2006. I was appointed Chief Executive Officer (CEO). Tony BRIGHTWELL was the previous managing director but he left in December 2005. To expedite matters throughout this statement I will refer to RISC Management Limited

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as RISC. RISC currently undertakes the following business functions-

Core Services

- Corporate Investigation and Litigation Support
- Business Intelligence
- Security Risk Management
- Cyber Risk Analysis, Computer Forensics (and) Protection
- Intellectual Property Protection
- Anti Money Laundering, Asset Tracing (and) Recovery
- Corporate Due Diligence
- Personal Due Diligence
- Reputational Issues
- Employee Fraud Investigations
- Physical Security Protection.

Specialist Services

- Surveillance (and) Counter Surveillance
- Electronic Counter Measures
- Criminal Mission Analysis
- Test Purchasing
- Kidnap Ransom Assessments
- Close Protection
- Personal Protection
- Marine Security.

Client Services

- Immigration Application and Appeals
- Taxation Services
- Accountancy
- Private Banking Services
- Investment Services
- Financial Advice and Awareness
- Business resource savings
- Insurance Services

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- Property Services, Purchase, Letting, Long Term Lease
- Whistle Blowing Management Services.

One of my primary roles as the CEO was to build the business and generate contacts and clients many of whom I dealt with personally. Upon meeting contacts and clients I would assess what could be offered to them by our business and our skills sets and then introduce them to the relevant individuals within my company to deal with their needs. I would also try to build up sub-contractors and others that would enhance the service that we offered. The use of confidential sources was and still is an integral part of RISC's business; sources are remunerated for services they provide. This form of service comes in two categories namely-

- i. providing reliable information concerning a client or client matter or,
- ii. for the referral or introduction of a contact or client.

The tasking of our sources was not recorded for obvious security reasons and unlike the police service, the use and conduct of our sources is not regulated. Payments to sources will be shown in company records under the sub heading of confidential informant payments. Sources were always paid in cash or via money transfers. For the safety of the individual we would not wish to create an audit trail. I can confirm that cash payments were made to Alexander LITVINENKO, but cannot recollect the specifics. I am not sure if we were ever actually invoiced by Alexander LITVINENKO. Along with the company directors there were a number of fee earning operatives who dealt directly with clients. In November 2006 the following personnel were employed by RISC, Cliff KNUCKEY, Daniel QUIRKE , Neil CASEY , David THOMPSON , Steve CULLIS , Gabriella CATLIN , Steve SHEPHERD , Graham WILSON , Matt DALY and Roy HATTON .

Following a separate police investigation undertaken by the MPS Directorate of Professional Standards (DPS), I am aware that various documents and hard drives were seized by police at the RISC Management offices in early 2006. In the course of making this statement I have been asked to detail any knowledge I might have of various instructions which may or may not have been conducted by RISC. I have been shown a number of documents that I shall refer to later in this statement and asked if I can provide an explanation about their purpose and/or content. During the initial police investigation into the circumstances surrounding the death of Alexander LITVINENKO in December 2006 the offices of RISC were examined for traces of radiation and several items were handed to the investigation team. I have been asked to

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comment on one particular exhibit namely a Sony Vaio laptop which is produced as exhibit MW/100, I am aware that Daniel QUIRKE had a laptop computer as did most of the employees'. I did not have password access and did not have use of his laptop computer. I was introduced to Alexander LITVINENKO, also known to me as Sasha, in or around 2001/2002 by the Russian oligarch Boris BEREZOVSKY. Boris BEREZOVSKY thought very highly of Alexander LITVINENKO. Boris BEREZOVSKY could be best described as high net worth individual, who was granted political asylum and allowed to remain in the United Kingdom. Boris BEREZOVSKY along with other Russian oligarchs made his wealth during the privatisation of Russian state businesses in the 1990's. He was a strong opponent of Vladimir PUTIN and remained to his death a very vocal critic of his regime. I was first introduced to him in 1999/2000 by Stephen CURTIS. Later in this statement I will described in more detail my relationship with Stephen CURTIS. I knew that Alexander LITVINENKO was an ex KGB operatively, latterly FSB, and someone who had attained a reasonable rank within the FSB. He seemed very well connected and was very knowledgeable around Russian affairs. However, he was also a very vocal critic of President Vladimir PUTIN and the Russian regime.

I am unable to provide any specific information pertaining to taskings that Alexander LITVINENKO was given and would defer to Cliff KNUCKEY and Daniel QUIRKE who dealt with him on a more frequent basis. I was unaware that Garym EVANS had primacy for dealing with Alexander LITVINENKO prior to leaving RISC at the beginning of 2006. Garym headed up the investigation team for RISC prior to the amalgamation with RISC Global. I formed the opinion that Alexander LITVINENKO was working or employed by others. This opinion is based on the fact that at times he appeared under pressure financially and was obviously not earning enough from work we put his way to support him and his family. I would imagine that Boris BEREZOVSKY had him on some sort or retainer but I don't know that for certain. At no time did we task Alexander LITVINENKO specifically to travel abroad on our behalf, this is not to say that he did travel abroad of his own volition but we never directly tasked him to do so. How he obtained his information and intelligence was his responsibility and he was to obtain this in a legal manner. I had no knowledge of any of his sources. What I can say with some certainty is that the due diligence taskings that he undertook on our behalf would have had more of a commercial impact and nothing that I would describe as causing a high risk to his safety. As a matter of routine whatever information Alexander LITVINENKO provided us with was

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subject to quality assurance processes and at times corroboration was sought from our other sources, this was especially so at the beginning of our relationship. Because Alexander LITVINENKO was so vociferously opposed to President PUTIN we had to separate the facts from the innuendo and political slant that the report/product might also contain. It was my view that only about 20 (percent) of the product he gave us had any commercial value. Any information received from a confidential source would have to be subject of quality assurance processes and Alexander LITVINENKO was no different.

Stephen CURTIS

Stephen CURTIS was a lawyer and close friend and associate of mine. He ran his own company CURTIS (and) Co which employed 3-4 lawyers up until his death on 2004. He was a very well connected individual who brought a significant amount of work to our company. He had strong and influential links worldwide at the highest level and at that time was professionally linked with three of the Russian oligarchs, Boris BEREZOVSKY, Mikhail KHORDOKOVSKY and Vladimir GUZINSKY.

I have been shown a document marked GMC/13 which I've been told is a report prepared by Patrick JOST dated 31/5/2005 addressed to Cliff KNUCKEY, and marked Re-Russian CD-ROM, translated from a CD exhibit CK/2 which was handed to Daniel QUIRKE by Alexander LITVINENKO. I can state that I have never seen this report before and have no recollection of the content which to me looks "a bit like a cut and paste from the internet". Patrick JOST is a very intelligent and highly talented linguist who is a very good contact of RISC.

YUKOS Oil

The Russian Federations prosecution of YUKOS executive Mikhail KHORDOKOVSKY is a well publicised case with significant implications in relation to Human Rights abuse. Both YUKOS and Altus Investments Management Limited instructed us to conduct due diligence in relation to current and former YUKOS directors and senior employees. These individuals had fled Russia or relocated to the United Kingdom following the arrest of Mikhail KHORDOKOVSKY. RISC would have taken instructions from two lawyers at YUKOS and Patrick de VINK at ALTUS. ALTUS Investments were acting on behalf of YUKOS personnel in relation to financial advice and investments. The vast majority of employees were concerned that at some stage they would be detained or arrested for their alleged involvement in the proceedings being brought against YUKOS by the Russian Federation's Prosecutors Office.

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ALTUS would periodically instruct RISC to complete work on their behalf. RISC was advising a significant number of YUKOS board members and employees which at the time stood at over forty people. These individuals were mainly located outside of Russia and were subject of threats and political persecution. It was agreed from the outset that RISC would be on a fixed retainer. The due diligence reports were compiled to provide ALTUS Investments with reassurance that they were conducting business lawfully when providing these individuals with support and advice around their financial activities. RISC reviewed intelligence coming from Russia in relation to the allegations or threats to YUKOS personnel and as a matter of course RISC would test the reliability and credibility of that information. RISC provided strategic advice and held numerous meetings with professional advisors from the UK, and Israel. I can also add that on occasions we have completed surveillance operations and gathered intelligence on Russian individuals whose credibility and integrity were questioned by the senior management team at YUKOS and our findings could be used against the false allegations coming from the Russian Prosecutors Office. In relation to RISC I can say that we were a significant player in providing strategy, intelligence and support to YUKOS during this significant period of time and to this day YUKOS still remain a client of ours. Alexander LITVINENKO was not our only confidential source providing intelligence around YUKOS. We had other sources which we could call upon to provide intelligence or information in this are. In 2001/02 RISC set up an office in Israel. We had a small team of individuals with varying skills including investigators, IT specialists, sweep experts (personnel capable of conducting security sweeps of offices and buildings for recording and listening devices) and a polygraph expert. Between 2002/04 the office was run by Nigel Brown. At that time YUKOS's former second in command Leonid NEVZLIN was based in Israel. Leonid NEVZLIN was an individual who again was of interest to the Russian Prosecutors as he was subject to an international arrest warrant and an individual who I had met many times in Israel. He is a very intelligent and wealthy individual; there was a period in time where I was travelling out to Israel almost every couple of weeks.

Andre LUGOVOY (and) Dmitry KOVTUN

I have been asked whether I know or have ever met Dmitry KOVTUN and/or Andre LUGOVOY. Whilst I appreciate the relevance of their names in relation to media reporting of Alexander LITVINENKO's death, to my knowledge I have never met either of them.

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Spain- To my knowledge we had no work undertaken or tasked out in relation to Russian subjects in Spain. In relation to Alexander LITVINENKO and to the best of my knowledge I can say that we did not ask him to undertake any work in Spain on our behalf.

ALFA Group- In relation to ALFA Group and Mikhail FRIEDMAN, I know of them but have no knowledge of any work undertaken by RISC. Mikhail FRIEDMAN was another oligarch who I would say was pro-PUTIN at that time.

I have been shown exhibits marked PT/5 file marked 193.plug which is an analyst chart around ALFA Group. The other document is exhibit PT/122 a report addressed to Mikhail MARATOVICH re ALFA Group. I have never seen either document before.

Project G- I have been shown exhibit PT/67 document titled "Project G" dated 5/5/2006 and a copy of exhibit CK/3/AI D2482 which relates to OJSC- Rubin. I can say the latter document was not generated by any RISC employee, as it is not in a recognisable format. To the best of my recollection I have never seen either document before.

Stolichnaya- SPI Group- I can confirm that RISC was instructed by the SPI Group, formerly known as Soyuzplodoimport during the communist era prior to 1990. SPI Group was owned by Yuri SHEFLER. In relation to this instruction which was ongoing I did task Alexander LITVINENKO to conduct work on our behalf. This was to identify any matters which were capable of impugning the reputation and integrity of two Russian individuals whose details I have today confirmed to police. I do not wish to divulge the names of the individuals for client confidentiality reasons. In relation to the above tasking I have been asked if I am aware of any product that Alexander LITVINENKO provided to Cliff KNUCKEY in April or May 2006. I am not aware of such a document but have been told that the report was declined by Cliff KNUCKEY as the information was substandard and not worthy of payment. The operational side of this instruction was solely dealt with by Cliff KNUCKEY. I do recollect that the instruction lasted for somewhere between 18 and 24 months.

Exhibit PT/63 is a spreadsheet which details due diligence work undertaken by RISC for the period from 01/01/2004- 23/06/2005. I have been asked to comment on the following entries marked with a reference number from the schedule-

16/04 Due diligence on Boris BEREZOVSKY by client ALTUS.

20/4 Due diligence on PATARKATSISHVILLI by client FCIB.

21/04 Due diligence on Boris BEREZOVSKY by client FCIB.

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25/04 Due diligence on Boris BEREZOVSKY by client ISC (plus) BB.

30/4 Update report on BEREZOVSKY client ALTUS.

50/04 Due diligence on Boris BEREZOVSKY by client Philena Trust.

54/05 Due diligence update on BEREZOVSKY by client ALTUS.

In relation to the due diligence reports on Boris BEREZOVSKY, as you can see there are numerous reports on behalf of ALTUS and FCIB who were looking to accept him as a client. I am aware there was some form of warrant in existence for him issued by the Russian Prosecutors Office in relation to an allegation of terrorist financing emanating from his involvement with Chechen insurgents and his association with Ahmed ZAKAYEV. At no time did I ever task Alexander LITVINENKO with work in which BEREZOVSKY was the subject matter.

20/04 Due diligence report on Badri PATARKATSISHVILLI. This was an instruction received from FCIB but I have no direct knowledge of that instruction.

86/05 Enquiries re Spanish project by client Wiggin OSBOURNE F. The client Wiggin OSBOURNE LLP are based in London and Gloucestershire. One of their partners is Tim OSBOURNE with whom I had a close working relationship. This tasking would have come from me but I have no recollection of the instruction. Wiggin OSBOURNE is a client who I believe looked after the interest of Group Menatap Limited which is a financial holding company dealing with the offshore interest of YUKOS amongst other companies. Group Menatap I believe is incorporated in Gibraltar, but my understanding is it only has a fiduciary presence there. The police have asked me if I have any recollection of an investigation called "White Whale" which was conducted by Spanish authorities in the Marbella area. I do not recollect such an investigation.

99/05 Due diligence profile on several Russian individuals for ALTUS Investments who are a Financial Services Authority (FSA) registered business. This spreadsheet entry is recorded as a 'prospect' meaning a potential instruction. It appears this did not manifest itself into a full blown instruction.

100/05 Latest due diligence profile on Vladimir GUZINSKY for our client ALTUS Investments. Vladimir GUZINSKY was a Russian media multi millionaire and I have no recollection of this instruction.

101/05 Due diligence profile on Dimitry GOLOBOV for our client Bingham

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McCUTCHEON LLP. Dimitry GOLOLOBOV was a former legal advisor for YUKOS. This instruction would have been a request for due diligence to assess the risks he presented to the client as a consequence of the YUKOS investigation and arrest of other YUKOS senior management and personnel.

In relation to Dimitry GOLOLOBOV, I have been shown two documents which are produced as PT/74 report dated 26<sup>th</sup> May 2005 and PT/68 report dated 30<sup>th</sup> June 2005 which refers to the instruction our company undertook. I can't recall seeing either of these documents before but they are both in a format used by RISC Global and I presume they were produced by Cliff KNUCKEY.

PT/73 is a report dated 12<sup>th</sup> July 2005 in relation to Alexander LITVINENKO. I have no knowledge of this instruction.

PT/75 is a report dated 2<sup>nd</sup> June 2005 which relates to an instruction around the following- Kirill GLUKGOVSKOY, Denis SALYUTIN and Roman GOLOVKIN. Because of the report narrative, I know the first individual to be a former YUKOS employee. I am unable to recall any information or material that related to the latter two mentioned individuals. I have no knowledge around this instruction but can confirm that the report is in a format used by RISC Global.

I have been shown a large number of documents which relate to the First Curacao International Bank (FCIB) which have also been recovered from exhibit MW/100 (Sony VAIO laptop). The files include a number of photocopies of Spanish passports. FCIB was run by a John DEUSS. I have no knowledge around this area of work and have never seen these documents before. I have been asked by police if I know or have ever conducted any investigations on behalf of clients into the activities of a person called Semion MOGILEVICH. All I can say is that I have never heard of the persons before today. Finally I have been asked about a report titled 'Main characteristics of Russian Organised Crime 2003-2005. I have no knowledge of this report and I did not task Alexander LITVINENKO to compile it. My company's primary instructions would be focused and structured into commercial intelligence and understanding as opposed to a sweep of political views. I am willing to attend court in respect of both the coronial process and criminal prosecution should one ever take place.

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