

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

<hr/>		
HULLEY ENTERPRISES LTD.,	)	
YUKOS UNIVERSAL LTD., AND	)	Case No. 1:14-cv-01996-BAH
VETERAN PETROLEUM LTD.,	)	
	)	
<i>Petitioners,</i>	)	Chief Judge Beryl A. Howell
	)	
v.	)	
	)	
THE RUSSIAN FEDERATION,	)	
	)	
<i>Respondent.</i>	)	
<hr/>		

**DECLARATION OF ALEXEI S. AVTONOMOV**

I, ALEXEI S. AVTONOMOV, declare as follows:

1. I am qualified to opine as an expert on issues of the law of the Russian Federation, including Russian constitutional law, as well as issues of comparative constitutional law and public international law. I have worked for more than thirty years as a Lecturer and Professor of Law at various institutions within the Russian Federation. These have included the Institute of State and Law at the Russian Academy of Sciences, the Moscow State Institute for International Relations, the Independent Institute of International Law, the Institute of Legislation and Comparative Law Studies, and the State University of Humanitarian Sciences. My qualifications are further detailed in my curriculum vitae, which is attached hereto as **Annex 1**.

2. I also attach hereto my three Expert Reports prepared between 2017 and 2019, analyzing certain issues of Russian law arising in relation to the application of Article 45(1) of the Energy Charter Treaty. These three Expert Reports are as follows:

- (i) [First] Expert Report: The Position of Provisionally Applicable, Unratified Treaties Under the 1993 Constitution of the Russian Federation and the Hierarchy of Legal Norms dated November 6, 2017, submitted as **Annex 2**;
- (ii) Second Expert Report: The Russian Conflict Rules Invoked by HVY and HVY’s Experts Under Article 15(4) of the 1993 Constitution and the Russian Statutes Duplicating Article 15(4) dated August 14, 2019, submitted as **Annex 3**; and,
- (iii) Third Expert Report of Professor Alexei S. Avtonomov: Comments Regarding HVY’s New Exhibits Concerning the Russian Legal System dated September 9, 2019, submitted as **Annex 4**.

3. I hereby reaffirm and restate all of the legal conclusions that I made earlier in these three expert reports.

4. My three Expert Reports cite to 112 documents designated as “Exhibits” or “Appendices,” with various prefixes. For example, the prefix, “ASA,” corresponds to my initials, and indicates the Exhibits that were filed originally with my Expert Reports. The prefix, “HVY,” corresponds to the initials of the Petitioners in the relevant litigation, and indicates the exhibits that were filed originally by Petitioners at various stages of the proceedings. Other prefixes refer to other Experts on Russian law retained by one of the litigants (*e.g.*, “PBS” refers to Professor Paul B. Stephan). These Exhibits are listed comprehensively in the attached index, which is designated as **Annex 5**.

5. Finally, as **Annex 6**, I attach hereto an additional judicial decision, designated as Ruling No. 2867-O-P of the Constitutional Court of the Russian Federation dated December 24, 2020. This judicial decision is binding within the Russian legal system and fully confirms my

reasoning on the proper interpretation of Russian law in light of Article 26 and Article 45(1) of the Energy Charter Treaty.

\* \* \*

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements of fact are true and correct and that all opinions expressed here are in accordance with my sincere belief.

Executed on May 11, 2022, in Moscow, Russian Federation.



---

Alexei S. Avtonomov