

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

WATCH TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA  
200 Watchtower Drive, Patterson, NY 12563,

Plaintiff,

v.

THE RUSSIAN FEDERATION  
Ministry of Foreign Affairs  
Smolenskaya-Sennaya Ploshchad, 32/34  
Moscow, Russia 119200;

MINISTRY OF HEALTH OF  
THE RUSSIAN FEDERATION  
Ministry of Foreign Affairs  
Smolenskaya-Sennaya Ploshchad, 32/34  
Moscow, Russia 119200; and

FEDERAL STATE BUDGETARY INSTITUTION  
“V.A. ALMAZOV NATIONAL MEDICAL  
RESEARCH CENTRE” OF THE MINISTRY OF  
HEALTH OF THE RUSSIAN FEDERATION  
Ulitsa Akkuratova, 2  
St. Petersburg, Russia 197341,

Defendants.

**CIVIL ACTION NO. 24-cv-2523**

**Complaint**

**Exhibit 1**

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**Declaration of Paul D. Polidoro in Support of Plaintiff’s Complaint**

Pursuant to 28 U.S.C. § 1746, I, Paul D. Polidoro, declare as follows:

1. I am an attorney admitted to practice law in New York and New Jersey, and I am a member of the Bar of the United States District Court for the District of Columbia. I represent Plaintiff Watch Tower Bible and Tract Society of Pennsylvania in this matter.
2. I am over the age of eighteen and make this declaration from personal knowledge based on information reviewed and/or referenced herein.
3. This declaration is submitted in support of the Complaint filed today by Plaintiff.

4. Attached hereto as Exhibit A is a true and correct copy of the *Welcome to the Administrative Center of Jehovah's Witnesses in Russia* brochure, dated 2012, in both English and Russian.

5. Attached hereto as Exhibit B is a true and correct copy of the Taxpayer Registration Certificate, dated June 26, 2000, issued by the Ministry of Taxes and Fees of the Russian Federation for St. Petersburg, reflecting that Watch Tower Bible and Tract Society of Pennsylvania was registered with the State Revenue Inspectorate as a foreign legal entity, entered into the tax register, and assigned a tax identification number, together with an English translation and its corresponding Certification of Translation.

6. Attached hereto as Exhibit C is a true and correct copy of Gift Contract No. 1, dated March 1, 2000, wherein the Administrative Centre of Jehovah's Witnesses in Russia transferred to Watch Tower Bible and Tract Society of Pennsylvania ownership and title of the real property, including ten buildings, located at "189649, St. Petersburg, pos. Solnechnoye, ul. Srednyaya, d. 6" (hereinafter "the Bethel Facility"), together with an English translation and its corresponding Certification of Translation.

7. Attached hereto as Exhibit D is a true and correct copy of the Certificates of State Registration of Rights issued by the St. Petersburg City Bureau of Registration of Rights to Real Property, reflecting the transfer of ownership of the Bethel Facility to Watch Tower Bible and Tract Society of Pennsylvania registered by state authorities on March 29, 2000, together with an English translation and its corresponding Certification of Translation.

8. Attached hereto as Exhibit E is a true and correct copy of Contract No. 2 for Uncompensated Use of Real Property, dated May 24, 2000, wherein Watch Tower Bible and Tract Society of Pennsylvania granted uncompensated use of the Bethel Facility to the Administrative

Centre of Jehovah's Witnesses in Russia, and a true and correct copy of the registration of this use contract by state authorities on November 14, 2000, together with an English translation and its corresponding Certification of Translation.

9. Attached hereto as Exhibit F is a true and correct copy of the Supplemental Agreement No. 1 to Contract No. 2 for Uncompensated Use of Real Property, dated November 20, 2000, that corrected a typographical error in Contract No. 2, and a true and correct copy of the registration of this supplemental agreement by state authorities on December 27, 2000, together with an English translation and its corresponding Certification of Translation.

10. Attached hereto as Exhibit G is a true and correct copy of the Gift Contract dated September 17, 2010, wherein the Administrative Centre of Jehovah's Witnesses in Russia transferred to Watch Tower Bible and Tract Society of Pennsylvania ownership and title of additional buildings and land comprising the Bethel Facility, and a true and correct copy of the registration of this transfer of property ownership by state authorities on October 23, 2010, together with an English translation and its corresponding Certification of Translation.

11. Attached hereto as Exhibit H is a true and correct copy of the Contract for Uncompensated Use of Real Property, dated July 28, 2011, wherein Watch Tower Bible and Tract Society of Pennsylvania granted further uncompensated use of the Bethel Facility to the Administrative Centre of Jehovah's Witnesses in Russia, and a true and correct copy of the registration of this use contract by state authorities on October 5, 2011, together with an English translation and its corresponding Certification of Translation.

12. Attached hereto as Exhibit I is a true and correct copy of the letter dated January 27, 2014, from Deputy Department Chief S.P. Akishin of the Russian Federation's Federal Security Service (FSB) informing that "the Russian Prosecutor General's Office, in cooperation with other

Russian law-enforcement agencies, is preparing to submit a claim to the [Russian Federation] Supreme Court to declare the organisation ‘Administrative Centre of Jehovah’s Witnesses in Russia’ extremist, to liquidate it, and to ban its activity in this country,” together with an English translation and its corresponding Certification of Translation.

13. Attached hereto as Exhibit J is a true and correct copy of the Ruling by Judge N.L. Bogdanova of the Sestroretskiy District Court in St. Petersburg, Russia, dated September 11, 2017, granting the Kurortnyy District Prosecutor’s request to place an arrest on the buildings and land comprising the Bethel Facility “belonging to Watch Tower Bible and Tract Society of Pennsylvania,” together with an English translation and its corresponding Certification of Translation.

14. Attached hereto as Exhibit K is a true and correct copy of the Decision in Case No. 2-788/2017 by Judge N.L. Bogdanova of the Sestroretskiy District Court in St. Petersburg, Russia, dated December 7, 2017, granting the Kurortnyy District Prosecutor’s request “in defence [sic] of the interests of the Russian Federation” to invalidate and void the contracts transferring ownership of the buildings and land comprising the Bethel Facility from the Administrative Centre of Jehovah’s Witnesses in Russia to Watch Tower Bible and Tract Society of Pennsylvania, and ordering the Bethel Facility to be turned over to the Russian Federation, together with an English translation and its corresponding Certification of Translation.

15. Attached hereto as Exhibit L is a true and correct copy of the letter dated December 7, 2018, from the Deputy Minister of Justice of the Russian Federation to the Third Section Registrar of the European Court of Human Rights conceding that, according to the Rosreestr property records, the “real estate objects, situated in St. Petersburg, pos. Solnechnoye at 6 Srednaya Street” “are owned by the Watch Tower Bible and Tract Society of Pennsylvania[.]”

16. Attached hereto as Exhibit M is a true and correct copy of the Ruling of the Supreme Court of the Russian Federation, No. 78-KF18-2094, dated December 13, 2018, denying the request for review and reaffirming the lower court's decision to invalidate the contracts and turn over the Bethel Facility to the Russian Federation, together with an English translation and its corresponding Certification of Translation.

17. Attached hereto as Exhibit N is a true and correct copy of the Excerpt from the Unified State Register of Real Property, dated March 1, 2019, containing the title and ownership history of the real property comprising the Bethel Facility, including the Russian Federation transferring Watch Tower's property to Defendant Federal State Budgetary Institution "V.A. Almazov National Medical Research Centre" of the Ministry of Health of the Russian Federation on February 19, 2019, and granting Almazov the right to enjoy "[p]ermanent (indefinite) use" of the Bethel Facility, together with an English translation and its corresponding Certification of Translation.

18. Attached hereto as Exhibit O is a true and correct copy of *Results 2019*, a report from the Ministry of Health of the Russian Federation—Almazov National Medical Research Centre ([http://www.almazovcentre.ru/wp-content/uploads/Annual-report\\_2019\\_Education.pdf](http://www.almazovcentre.ru/wp-content/uploads/Annual-report_2019_Education.pdf)) that includes photos of Almazov personnel at the Bethel Facility and discloses that "[n]ot long ago Almazov National Center was given the opportunity to implement innovative educational [and biomedical and scientific] projects after the land and complex of buildings transfer in Solnechny [sic] village in the Kurortny [sic] district of St. Petersburg" made to Almazov and its corresponding Certification of Translation.

19. Attached hereto as Exhibit P is a true and correct copy of a news article published on Almazov National Medical Research Centre's website reporting the visit of the Minister of

Health of the Russian Federation to the Bethel Facility on June 28, 2023. This article includes photos of the Minister of Health, the Director General of Almazov, and other officials standing in the main reception lobby of the Bethel Facility and touring the Bethel Facility. See <http://www.almazovcentre.ru/?p=94624&lang=en> (last visited Aug. 26, 2024).

20. Attached hereto as Exhibit Q is a true and correct copy of the Property Valuation Report prepared by Engel & Völkers, dated November 20, 2017, establishing the market value for Watch Tower's Bethel Facility as USD 30,972,000.

21. Attached hereto as Exhibit R is a true and correct copy of the Property Valuation Report prepared by Knight Frank, dated September 8, 2017, establishing the value of Watch Tower's Bethel Facility based on the "cost approach" as RUB 1,824,308,454 (approximately USD 32,011,027 at the exchange rate for Russian rubles to U.S. dollars at the time of valuation).

22. Attached hereto as Exhibit S is a true and correct copy of the letter dated January 26, 2023, from the Office of the Prosecutor General of the Russian Federation to Attorney P. Muzny, communicating that the judgment of the European Court of Human Rights in *Taganrog LRO and Others v. Russia*, and the compensation awarded are not subject to enforcement in the Russian Federation, together with an English translation and its corresponding Certification of Translation.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 3<sup>rd</sup> day of September 2024, in Patterson, New York.



Paul D. Polidoro (D.C. Bar No. NY0575)

*Counsel for Plaintiff Watch Tower Bible and Tract Society of Pennsylvania*