ZMINA
HUMAN RIGHTS CENTER

ANALYTICAL REPORT

SYSTEMIC PRESSURE ON ANTI-CORRUPTION ACTORS: PRACTICES IN 2025–2026

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This study analyses the challenges faced by anti-corruption actors and anti-corruption work in Ukraine in 2025–2026. Drawing on systematically collected documentation records, testimonies from anti-corruption actors, court monitoring reports, legal analyses by lawyers, and open sources, it examines the use of criminal procedural mechanisms against anti-corruption actors. The study describes the key types and mechanisms of pressure, assesses compliance with fair trial standards, the compliance of state authorities' actions with national legislation and the standards of the European Convention on Human Rights, and identifies recurring patterns that may indicate the systemic nature of pressure on anti-corruption actors.

Cover photo: Ruslan Mahamedrasulov, Head of the Detective Unit of the National Anti-Corruption Bureau of Ukraine (NABU), during a hearing at the Kyiv Court of Appeal, 12 November 2025. Photo credit: Hanna Chekhovych for ZMINA

ZMINA works to protect freedom of expression, the rights to peaceful assembly and freedom of association, combat discrimination, prevent torture and ill-treatment, fight impunity, and protect human rights defenders and civic activists throughout Ukraine, including occupied Crimea, as well as the rights of people affected by the war. The organisation conducts information campaigns and educational programmes, monitors and documents human rights violations, war crimes and crimes against humanity, produces research and analytical reports, and promotes change through national and international advocacy.

For more information about Human Rights Centre ZMINA and its work: zmina.info, zmina.ua

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CONTENTS

LIST OF ABBREVIATIONS

AFU – Armed Forces of Ukraine
AntAC – Anti-Corruption Action Centre
ARMOR – Automated Workstation for Operational Officers
CC of Ukraine – Criminal Code of Ukraine
CISA – Covert Investigative (Search) Actions
CPC of Ukraine – Criminal Procedure Code of Ukraine
CSO “A” of the SSU – Special Operations Centre “A” of the Security Service of Ukraine
DPNS SSU – Department for the Protection of National Statehood of the Security Service of Ukraine
ECHR – European Convention on Human Rights
ECtHR – European Court of Human Rights
ESBU – Economic Security Bureau of Ukraine
EU – European Union
FSB – Federal Security Service of the Russian Federation
HACC – High Anti-Corruption Court
JSC – Joint Stock Company
Kyiv SIZO – Kyiv Pre-Trial Detention Centre
MMC – Military Medical Commission
NABU, the Bureau, the National Bureau – National Anti-Corruption Bureau of Ukraine
NACP, the Agency – National Agency on Corruption Prevention
NGO – Non-Governmental Organisation
NKVD – People’s Commissariat for Internal Affairs of the Soviet Union
NPM – National Preventive Mechanism
NSDC – National Security and Defence Council of Ukraine
Ombudsman, Commissioner – Ukrainian Parliament Commissioner for Human Rights
OP – Office of the President
OPFL – Opposition Platform – For Life
OPG – Office of the Prosecutor General
PGO – Prosecutor General’s Office of Ukraine (reorganised into the OPG in 2020)
SAPO – Specialised Anti-Corruption Prosecutor’s Office
SBI – State Bureau of Investigation
SIZO – Pre-Trial Detention Centre
SSU – Security Service of Ukraine
STS – State Tax Service of Ukraine
TIC – Temporary Investigative Commission
TOT – Temporarily Occupied Territories
TCR and SS – Territorial Centre for Recruitment and Social Support
UDO – Administration of State Guard of Ukraine
URPI – Unified Register of Pre-Trial Investigations
USRCD – Unified State Register of Court Decisions
VRU, Parliament – Verkhovna Rada of Ukraine

EXECUTIVE SUMMARY

This study by Human Rights Centre ZMINA covers the period from 11 July 2025 to 31 May 2026 and analyses 29 documented cases of pressure on anti-corruption actors and persons associated with them in Ukraine. Of these, 21 cases concern NABU detectives and other employees, four involve former NABU detectives, two concern civic activists, one involves a close relative of an anti-corruption actor, and one concerns a witness in proceedings involving an anti-corruption actor. The study is based on testimonies from anti-corruption actors, court monitoring materials, legal opinions prepared by lawyers, procedural documents, and open sources.

The collected evidence points to a concentrated wave of interconnected criminal procedural, administrative, political, and information-based measures targeting individuals and institutions involved in exposing high-level corruption. The escalation was triggered by NABU's investigations into senior political officials. On 22 June 2025, NABU served a notice of suspicion on Oleksii Chernyshov, former Deputy Prime Minister; on 15 July 2025, searches were carried out at the home of Rostyslav Shurma, former Deputy Head of the Office of the President; and investigators were preparing to serve a notice of suspicion on Tymur Mindich, businessman, who is widely reported to have close ties to the President's inner circle.

Against this backdrop, on 11 July 2025, searches were conducted at the home of Vitaliy Shabunin, Chair of the Board of the NGO Anti-Corruption Action Centre (AntAC) and one of Ukraine's leading anti-corruption activists, who was serving in the Armed Forces at the time. On 21 July 2025, coordinated searches were carried out at the homes of more than fifteen NABU detectives. At the same time, narratives alleging a supposed "Russian trace" within NABU and SAPO were systematically promoted in the media. Political pressure culminated in the expedited adoption by the Verkhovna Rada of Ukraine of amendments to Draft Law No. 12414, which effectively subordinated NABU and SAPO to the Prosecutor General. Following significant domestic and international pressure, these changes were effectively reversed by Law No. 4560-IX, which entered into force on 1 August 2025.

MAIN FORMS OF PRESSURE

Across the 29 cases documented by Human Rights Centre ZMINA, criminal proceedings were initiated against 28 anti-corruption actors, their close relatives, and witnesses, primarily under serious offences of the CC of Ukraine, including Article 111, "High Treason"; Article 111-2, "Aiding the Aggressor State"; Article 114-1, "Obstruction of the Lawful Activities of the AFU and Other Military Formations"; Article 209, "Legalisation (Laundering) of the Proceeds of Crime"; and Article 368-5, "Illicit Enrichment". Searches were conducted in 24 of the 29 cases; in 20 of those 24 cases, the searches were carried out as "urgent" searches without prior authorisation by an investigating judge. In many instances, the criminal proceedings had been registered 12–20 days or earlier before the investigative measures were carried out. Against this background, the justification for relying on the urgent search procedure requires separate assessment in each individual case.

The first large-scale form of pressure consisted of searches, detentions, seizures of electronic devices, and the imposition of preventive measures. On 11 July 2025, three searches were conducted without prior authorisation by an investigating judge in proceedings concerning Vitaliy Shabunin: at his place of military service in the Kharkiv region and at his registered address in the Kyiv region, where his wife and children were staying. Shabunin's phone and laptop, as well as electronic devices belonging to his family members, were seized. On the same day, a search was conducted at the apartment of the fallen serviceman Andrii Pilshchykov ("Juice"), where Shabunin had previously stayed temporarily. On 21 July 2025, coordinated searches were carried out involving at least 19 NABU detectives, other employees, and persons associated with them, including Viktor Husarov, Mykhailo Cherviakov, Ruslan Mahamedrasulov, Mykhailo Romaniuk, Valentyn Shmitko, and others. In Ruslan Mahamedrasulov's case, searches were conducted at no fewer than three addresses, as well as at the homes of his parents and sisters; in Mykhailo Romaniuk's case, at four addresses; and in Valentyn Shmitko's case, at three. In 12 cases, searches were conducted at premises where the individuals did not actually reside, including the homes of parents, parents-in-law, brothers, or sisters.

The second key form of pressure was the initiation and conduct of criminal proceedings. The study found that criminal proceedings against NABU detectives and other employees, former detectives, anti-corruption activists, and their close relatives were initiated under the most serious provisions of the CC of Ukraine (including Articles 111, 111-2, 114-1, 209, and 368-5), often without a sufficiently individualised evidentiary basis. In the case of Viktor Husarov, NABU detective, the notice of suspicion under Article 111 of the CC of Ukraine relied to a large extent on materials from other criminal proceedings dating from 2019–2022, which had not been properly incorporated into the case file and contained no specific information regarding his alleged conduct, contrary to the requirements of the CPC of Ukraine. Similar approaches to the formulation of notices of suspicion were identified in other criminal proceedings involving anti-corruption actors. Taken together, these practices created a situation in which merely being a suspect in proceedings concerning high treason, aiding the aggressor state, illicit enrichment, or other serious offences became, in itself, a source of reputational and professional pressure, even in the absence of convincing evidence. This form of pressure was applied not only to NABU detectives but also to activists, their relatives, and witnesses.

The third form of pressure consisted of institutional and political influence. In the documented cases, criminal procedural measures targeting anti-corruption actors – including employees of anti-corruption institutions, civic activists, investigative journalists, and other individuals engaged in anti-corruption work – were carried out in parallel with the use of political instruments, primarily legislative amendments, parliamentary procedures, and decisions of executive authorities aimed at changing the rules governing the anti-corruption system, revising the principles underpinning the independence of NABU and SAPO, and undermining the legitimacy of the anti-corruption infrastructure. Combined with the criminal proceedings, these measures reinforced their deterrent effect and signalled the possibility of political interference in the activities of independent anti-corruption institutions.

The fourth form of pressure consisted of information campaigns. Narratives alleging a purported "Russian trace" within NABU and SAPO, as well as discrediting materials targeting Vitaliy Shabunin, AntAC, NABU's leadership and detectives, and other anti-corruption actors, were systematically disseminated through the media and anonymous Telegram channels with large audiences. This information pressure accompanied the searches conducted on 11 and 21 July 2025, individual notices of suspicion, and political decisions, providing an informational justification for subsequent law enforcement actions and legislative initiatives while reinforcing the deterrent effect across the anti-corruption community.

KEY PATTERNS INDICATING THE SYSTEMIC NATURE OF THE PERSECUTION

The analysis of the documented cases identifies a number of recurring patterns that point to the systemic nature of the pressure.

The first is the clear temporal concentration of events: the searches involving Vitaliy Shabunin on 11 July 2025, the coordinated searches of NABU detectives on 21 July 2025, the information campaigns, and the attempt to legislatively subordinate NABU and SAPO all took place within a short period of time. The concentration of these key events over the course of several weeks points to a politically and organisationally driven campaign rather than a coincidental convergence of individual criminal proceedings.

The second pattern is the targeting of a narrow group of individuals connected with sensitive anti-corruption investigations. The largest group of documented cases concerned NABU detectives, former detectives, civic activists, their close relatives, and witnesses – that is, individuals who could directly or indirectly influence investigations into high-level corruption.

The third pattern is the combined use of multiple instruments simultaneously, including searches, criminal proceedings, information campaigns, and political decisions.

The fourth pattern is the recurrence of the same procedural deficiencies: the use of the "urgent" search procedure without sufficient grounds, coordinated investigative measures at multiple locations, the seizure of electronic devices containing official or private information, searches conducted at the homes of relatives, and formalistic or insufficiently effective judicial oversight. Taken together, these features go beyond autonomous decisions made in individual cases and point to the coordinated nature of the pressure.

ASSESSMENT OF COMPLIANCE WITH NATIONAL STANDARDS OF CRIMINAL PROCEEDINGS

The study assesses compliance with key procedural standards in the course of the criminal prosecution of anti-corruption activists, their close relatives, and witnesses. These include the standards of reasonable suspicion; the admissibility, relevance, reliability, and sufficiency of evidence; the proportionality of interference with human rights; effective judicial oversight; and respect for human dignity, which together constitute the fundamental human rights safeguards in criminal proceedings. These standards ensure the legality, fairness, and effectiveness of criminal proceedings and must be applied in conjunction with other procedural safeguards, including the presumption of innocence, the right to defence, and the principle of legal certainty.

The findings indicate shortcomings in the practical application of these standards, particularly with regard to the proper substantiation of reasonable suspicion, the quality and procedural form of evidence, and the effectiveness of judicial oversight. These shortcomings create a risk of a formalistic approach to procedural decision-making and result in unjustified interference with individual rights.

ASSESSMENT OF COMPLIANCE WITH THE STANDARDS OF THE EUROPEAN CONVENTION ON HUMAN RIGHTS

The documented practices display indications of violations of Article 3, “Prohibition of Torture”; Article 5, “Right to Liberty and Security”; Article 6, “Right to a Fair Trial”; Article 8, “Right to Respect for Private and Family Life”; and Article 18, “Limitation on the Use of Restrictions on Rights”, of the European Convention on Human Rights. Risks arise, in particular, where detention or pre-trial detention is insufficiently justified or disproportionate (Article 5), where the right to defence is restricted, the principle of equality of arms is undermined, or judicial oversight is merely formal (Article 6), and where searches and the seizure of data result in excessive interference with private life (Article 8). Of particular importance to this study is the application of Article 18 of the ECHR, which makes it possible to assess whether criminal procedural mechanisms are being used not for a legitimate purpose but to pursue political or institutional objectives.

IMPACT ON THE ANTI-CORRUPTION SYSTEM

The documented practices had consequences extending far beyond individual instances of pressure and persecution. They posed a genuine threat to the institutional independence of NABU and SAPO, increased risks for individuals engaged in anti-corruption work, and created an environment of legal uncertainty for all those involved in sensitive anti-corruption investigations.

The attempt to legislatively subordinate NABU and SAPO through amendments to the original version of Draft Law No. 12414 demonstrated that, even where a formally established anti-corruption infrastructure exists, its independence remains politically vulnerable. The fact that the legislative amendments were adopted within a single day, and that their subsequent repeal became possible only after mass protests and sustained pressure from international partners, demonstrates the fragility of the existing institutional safeguards.

In day-to-day practice, this may lead to self-censorship, reluctance to take proactive steps in sensitive proceedings, diminished trust in public institutions, and a reduced capacity of the anti-corruption system to fulfil its fundamental purpose – ensuring the inevitability of accountability for high-level corruption. More broadly, it has structural implications for the rule of law, Ukraine’s European integration path, and international partners’ confidence in the irreversibility of anti-corruption reform.

The cumulative weight of the 29 documented cases, their temporal concentration, their focus on individuals connected with investigations into high-level corruption, the recurrence of procedural deficiencies, the combination of criminal procedural, political, and information-based pressure, as well as the attempt to legislatively curtail the independence of NABU and SAPO, provide grounds for concluding that, in 2025–2026, a pattern of systemic pressure on anti-corruption actors emerged in Ukraine, affecting both employees of state anti-corruption institutions and civil society activists. The nature of this pressure, its coordination, scale, and consequences also point to indications of political motivation, particularly in view of its apparent aim of weakening the anti-corruption sector and undermining its capacity to investigate and expose high-level corruption.

A distinctive feature of this pressure is that it is exercised primarily through formally lawful mechanisms – criminal proceedings, searches, preventive measures, parliamentary procedures, and public communications by state authorities. This is precisely what makes it particularly dangerous: mechanisms that appear lawful on their face begin to function as instruments of deterrence, discreditation, and the subordination of the anti-corruption infrastructure to political interests, posing a direct threat to the rule of law and Ukraine's democratic development.

RECOMMENDATIONS

TO THE PRESIDENT OF UKRAINE:

1. Submit appointment proposals and make appointments in a timely manner, within the scope of the President's constitutional powers, where they affect the independent functioning of anti-corruption and judicial institutions.
2. Refrain from making statements or taking actions that may influence specific proceedings or undermine judicial independence.

TO THE VERKHOVNA RADA OF UKRAINE:

1. Amend the relevant sectoral legislation, where such provisions are currently absent, to ensure the permanent participation of international experts in selection commissions responsible for appointing the leadership of anti-corruption institutions and in judicial governance bodies, with decisive voting rights, without allowing their participation to terminate automatically after the first composition of such commissions, as a safeguard for the independence and integrity of appointments and as protection against political influence over these bodies.
2. Draft and introduce amendments to the CPC of Ukraine guaranteeing the participation of the person whose premises have been searched, and their defence, in proceedings concerning an application for judicial authorisation of a search carried out without prior authorisation by an investigating judge.
3. Regulate the operation of anonymous Telegram channels with regard to ownership transparency and accountability for the dissemination of false information, while ensuring compliance with international standards on freedom of expression.

TO THE CABINET OF MINISTERS OF UKRAINE:

1. Instruct the competent authority (including the NACP) to develop, and subsequently approve, a state policy for the protection of individuals engaged in anti-corruption and human rights work. The policy should provide for a mechanism to respond to incidents of pressure, designate the responsible authority, and ensure periodic public reporting on its implementation.

TO LAW ENFORCEMENT AUTHORITIES AND THE PROSECUTION SERVICE (THE OFFICE OF THE PROSECUTOR GENERAL, THE STATE BUREAU OF INVESTIGATION, AND THE SECURITY SERVICE OF UKRAINE):

1. Carry out procedural measures and operational-search activities with due respect for the rights of every person affected by them, including family members and third parties, refraining from seizing electronic devices and data storage media containing private information belonging to persons who have no procedural status in the case, and from conducting searches in a manner or at a time that jeopardises the rights and safety of those concerned.
2. Comply with the principles of legality and proportionality, including under martial law, and refrain from engaging in conduct that amounts to degrading treatment.
3. Ensure that the grounds for their actions are properly documented and remain accessible for review and challenge.
4. Refrain from undermining the presumption of innocence, including by disclosing the identities of suspects or materials obtained during searches before the completion of the investigation.

5. Refrain from using mobilisation or other administrative procedures as a means of influencing witnesses, victims, or other participants in criminal proceedings in order to obtain desired testimony or otherwise influence their position.

6. Refrain from discrimination on the grounds of ethnic origin, and do not use a person's origin, the residence of their relatives in the TOT of Ukraine, their possession of documents issued by the Russian Federation, or their contacts with foreign nationals as grounds for publicly accusing individuals or initiating procedural actions (for example, detention).

TO THE OFFICE OF THE PROSECUTOR GENERAL:

1. Introduce a mandatory, documented review by a prosecutor of the grounds justifying urgency in every search conducted without prior authorisation by an investigating judge.

2. Ensure that prosecutorial supervision is not used to authorise or direct investigative actions in a manner that violates individual rights, and that prosecutors are held accountable for the lawfulness of actions carried out under their supervision.

3. Examine complaints concerning pressure and human rights violations within the prescribed time limits and issue a reasoned written decision following their examination.

TO THE STATE BUREAU OF INVESTIGATION:

1. As the authority responsible for investigating crimes committed by law enforcement officers, ensure the effective, independent, and prompt investigation of all allegations of ill-treatment, torture, and bodily injuries inflicted during arrests and searches, culminating in a procedural decision subject to judicial review.

2. Ensure that every individual undergoes a medical examination and that the grounds for the use of force are documented in every case as a prerequisite for such investigations.

3. Refrain from the disproportionate use of force during its own investigative actions.

TO THE SECURITY SERVICE OF UKRAINE:

1. Refrain from deploying special-purpose units or using demonstrative shows of force during investigative actions unless there are reasonable grounds to believe that the individual will offer armed resistance or pose a threat to security.

2. Introduce internal procedures for responding to leaks of pre-trial investigation data and possible abuses.

TO THE JUDICIARY:

1. Ensure meaningful, rather than merely formal, judicial oversight of the rights, freedoms, and legitimate interests of individuals in criminal proceedings.

2. Ensure that pre-trial detention is not imposed without sufficient grounds and respond effectively to cases of deprivation of liberty without proper procedural safeguards.

3. Ensure the effective participation of the defence in ex post judicial review of property seizure orders.

TO THE MINISTRY OF JUSTICE OF UKRAINE:

1. Ensure that every person held in pre-trial detention has access to an independent medical examination and timely medical care, and that the denial of such care is never used as a means of pressure or punishment.

2. Inspect the conditions of detention and the provision of medical care at the Kyiv SIZO, where such violations have been documented, and remedy any shortcomings in compliance with standards of humane treatment.

3. Ensure unhindered access for the National Preventive Mechanism and monitoring missions to places of deprivation of liberty.

TO THE MEDIA:

1. Adhere to the standards of accuracy, fact-checking, and balanced reporting;

2. Refrain from reproducing unverified or manipulative information that may form part of disinformation or discreditation campaigns.

3. Respect the presumption of innocence by reporting statements made by law enforcement authorities with a clear indication of the procedural status of the individuals concerned (suspect, accused) and by refraining from presenting unsubstantiated allegations as established facts before a final court judgment.

TO INTERNATIONAL ORGANISATIONS:

1. Take into account Ukraine's compliance with human rights standards and the guarantees for the protection of individuals engaged in anti-corruption and human rights work when assessing progress within the accession negotiation process.

2. Reflect the documented cases of violations and pressure in relevant monitoring reports and raise them in dialogue with the Ukrainian authorities.

INTRODUCTION

In 2025–2026, the independence of Ukraine's anti-corruption system once again became the focus of public, legal, and political attention. The events of this period renewed concerns about the limits of permissible state interference in the work of anti-corruption actors and institutions, as well as the resilience of the system for preventing and combating high-level corruption established following the Revolution of Dignity.

This issue is of particular importance in the context of Ukraine's European integration. The Rule of Law Roadmap, adopted in 2025, implementation of which is a prerequisite for progress in the accession negotiations under the "Fundamentals" cluster, directly links Ukraine's progress to the proper functioning of rule of law institutions and the strengthening of the capacity of anti-corruption bodies[1]. Within this framework, any practices that may indicate pressure on NABU, SAPO, the HACC, anti-corruption activists, or other individuals engaged in anti-corruption work are relevant not only to domestic policy and confidence in the irreversibility of anti-corruption reform, but also to Ukraine's fulfilment of its obligations to the EU.

This study seeks to determine whether the documented cases of pressure on anti-corruption actors constitute a series of isolated incidents or instead indicate a recurring pattern characterised by systemic pressure and political motivation. To this end, it analyses the cases of criminal procedural, institutional, political, and information-based pressure on anti-corruption actors documented by Human Rights Centre ZMINA between July 2025 and May 2026.

The study also seeks to assess whether the documented actions and decisions comply with national legislation and the standards of the European Convention on Human Rights, as well as to determine their potential impact on the institutional independence of the anti-corruption system, the rule of law, and Ukraine's democratic development. In this sense, it seeks to identify broader patterns that are relevant to public policy, human rights advocacy, and Ukraine's European integration path.

1 Rule of Law Roadmap, approved by Resolution No. 475-r of the Cabinet of Ministers of Ukraine dated 14 May 2025.: https://zakon.rada.gov.ua/laws/show/475-2025-%D1%80#Text

METHODOLOGY

This study, conducted by Human Rights Centre ZMINA, is based on an analysis of cases of pressure on anti-corruption actors, including employees of state institutions and civic activists, their close relatives, and individuals involved in defending anti-corruption actors, that occurred in Ukraine during 2025 and early 2026. Pressure is understood as actions or omissions by state authorities, public officials, or other actors that, through criminal procedural, administrative, information-based, or other forms of pressure, are intended to alter or restrain the activities of such individuals, including by creating adverse legal, professional, or personal consequences for them, restricting their rights and freedoms, or producing a deterrent effect on their future activities.

For the purposes of this study, the umbrella term “anti-corruption actors” refers to individuals who, in a professional capacity or through civic engagement, expose, prevent, investigate, or exercise public oversight of corruption. This category includes employees of anti-corruption institutions (NABU detectives and other employees, and SAPO prosecutors), investigative journalists, civic activists, human rights defenders, and experts whose work is aimed at promoting integrity in public administration. The study also examines cases of pressure directed against their close relatives (including parents, spouses, children, and siblings) and individuals involved in their defence (such as lawyers and witnesses), as pressure exerted on a person’s immediate circle may also affect anti-corruption actors by creating a chilling effect on anti-corruption activities.

The methodological approach combines the documentation of instances of pressure and persecution, their verification on the basis of multiple independent sources, comparative analysis of the documented cases, and a legal assessment of the actions of state authorities in the light of national legislation and the provisions of the European Convention on Human Rights. This approach makes it possible to establish the relevant facts, identify recurring practices, and assess them against human rights standards, including for the purpose of determining whether they display characteristics of systemic violations.

Individual cases and procedural decisions are analysed against the requirements of national legislation and applicable legal safeguards. In addition, the cases are compared in order to identify recurring instruments of pressure and assess their systemic nature. This approach makes it possible to interpret individual events not as isolated incidents but as elements of coordinated practices, and to draw conclusions as to the presence or absence of systemic pressure.

For the purposes of this study, systemic pressure refers to a set of recurring, interconnected, or coordinated forms of pressure that exhibit a sustained pattern, are implemented through different institutional mechanisms, and extend beyond isolated incidents, thereby posing a threat to the functioning of the anti-corruption infrastructure.

This study was conducted in the context of Russia’s full-scale war against Ukraine and the legal regime of martial law. The documented cases include the use of procedural mechanisms involving deferred judicial oversight, in particular investigative actions carried out without prior judicial authorisation. In view of the nature of these procedural decisions, the study focuses on assessing the justification, necessity, and proportionality of such interferences, including the application of preventive measures, the sufficiency of the evidentiary basis, actions taken during and after arrests and searches, and compliance with national standards governing criminal proceedings.

PURPOSE OF THE STUDY

The purpose of this study is to provide a comprehensive analysis and legal assessment of criminal proceedings involving anti-corruption actors during 2025–2026 in order to identify indications of unlawful pressure, violations of human rights and fair trial guarantees, determine whether such practices exhibit a systemic character, and develop recommendations aimed at strengthening protection mechanisms and preventing the persecution of anti-corruption actors in Ukraine.

OBJECTIVES OF THE STUDY

To achieve this purpose, the study pursued the following objectives:

1. To describe and systematise individual cases displaying indications of possible pressure on anti-corruption actors over the eleven-month period from July 2025 to May 2026, documenting the key facts, chronology of events, and parties involved in each case.
2. To analyse the nature and lawfulness of the procedural actions taken in the documented cases in order to identify possible mechanisms of pressure or abuse, including potential violations committed during investigative (search) and other procedural actions, the application of preventive measures, public statements by public officials, and accompanying information campaigns, and to assess whether these practices display a systemic character.
3. To assess whether the decisions, actions, and omissions of investigative authorities and courts in the documented cases comply with the standards of national legislation governing criminal proceedings, on the basis of a legal analysis of cases involving the criminal prosecution of anti-corruption actors and civic activists.
4. To assess whether the actions and decisions of state authorities in the documented cases comply with the provisions of the ECHR, taking into account the relevant case-law of the ECtHR.
5. To formulate conclusions and recommendations for state authorities, international partners, and the human rights community aimed at remedying the identified violations, preventing their recurrence, strengthening guarantees for the independence of anti-corruption actors and institutions, and ensuring respect for the rights of individuals engaged in anti-corruption work, including under the restrictions imposed by martial law.

OBJECT OF THE STUDY

The object of this study is the actions and procedural decisions of pre-trial investigation authorities, the prosecution service, and the courts in criminal proceedings involving anti-corruption actors in Ukraine during 2025–2026. The analysis covers notices of suspicion, the imposition and extension of preventive measures, searches and other investigative and procedural actions, as well as the exercise of judicial oversight. It also examines related public communications and information campaigns that may affect anti-corruption activities, professional independence, and the rights of the individuals concerned, including the presumption of innocence, and that may display indications of selectivity, disproportionality, or departures from due legal process.

SUBJECT OF THE STUDY

The subject of the study comprises the specific forms, mechanisms, and consequences of possible pressure on anti-corruption actors, including:

- criminal proceedings and the related investigative and procedural actions (arrests, searches, interviews, temporary access to items and documents orders, property seizure orders, and the application of preventive measures), assessed for the compliance of the actions and decisions of pre-trial investigation authorities, the prosecution service, and the courts with national legislation and the standards of the ECHR, taking into account the case-law of the ECtHR;
- recurring patterns and approaches in the adoption and review of procedural decisions by prosecutors, investigating judges, and courts, including with regard to the substantiation of reasonable suspicion, the imposition and extension of preventive measures, and the effectiveness of judicial oversight;
- the role of information campaigns and public statements by public officials as instruments of pressure, their synchronisation with procedural actions, and their impact on the anti-corruption environment;

- the consequences of such persecution for the individuals concerned, as well as for the functioning of anti-corruption institutions and the sector as a whole.

The subject of the study encompasses both the individual dimension (specific cases and violations) and the broader analytical dimension (recurring patterns and systemic features of persecution), making it possible to assess the documented cases within a wider legal and institutional context.

METHODS AND STRUCTURE OF THE STUDY

The study is structured as a step-by-step analysis of documented cases of pressure on anti-corruption actors, followed by a legal assessment. This approach was chosen in view of the subject of the study – practices implemented through specific criminal proceedings, procedural decisions, and judicial actions, which cannot be properly assessed outside the context of individual cases.

The basic unit of analysis is an individual documented case, encompassing the entirety of investigative, procedural, and judicial actions and decisions relating to a specific individual or group of individuals connected with anti-corruption activities. In total, the study analyses 29 individual cases: 21 involving NABU managers, detectives, and other employees; four involving former NABU detectives; two involving civic activists; one involving close relatives of anti-corruption actors; and one involving a witness in proceedings concerning an anti-corruption actor.

THE SELECTION OF CASES IS BASED ON A NUMBER OF CRITERIA.

First, the analysis includes only those cases in which interventions by law enforcement authorities directly affected individuals engaged in anti-corruption activities, whether as NABU employees, civic activists, witnesses, or their close relatives, where the measures taken against them could affect the principal subjects of anti-corruption investigations. This makes it possible to focus specifically on situations in which there is a link between procedural measures and the exercise of anti-corruption functions.

Second, all 29 cases unfolded within a single continuous period – from the second half of 2025 through 2026 – forming a concentrated body of events. This temporal concentration provides grounds for examining them within the broader context of the political and institutional developments of that period.

Third, the sample includes cases involving searches, arrests, the application of preventive measures, property seizure, and discreditation campaigns in the media, all of which required assessment from a human rights perspective. Accordingly, the analysis does not encompass criminal proceedings in general, but rather those cases in which procedural actions were accompanied by potentially significant consequences for the rights, professional activities, or reputation of the individuals concerned.

Fourth, each case is supported by the available evidence, including procedural documents, judicial decisions, records, statements by the parties, and public communications issued by state authorities. This made it possible to conduct a legal assessment based on verifiable facts.

Fifth, the sample covers different groups of individuals (detectives, civic activists, their close relatives, and witnesses), making it possible to compare the nature of the interference according to each person's status and role in the proceedings and to determine whether such actions display common characteristics regardless of the individual's procedural status. The resulting sample is suitable for assessing the presence of recurring elements of interference and makes it possible to examine whether the documented cases display characteristics of coordinated practices and a systemic nature.

For each case, a structured record was prepared documenting the chronology of events, the content of procedural decisions, the role of the pre-trial investigation authorities, the prosecution service, and the courts, as well as the consequences of these actions for the individual's professional activities and legal status.

The documentation of cases was based on open sources, testimonies from anti-corruption actors, and observations made during court hearings. All information was structured using a uniform set of parameters, ensuring the comparability of data across different cases and enabling their subsequent analysis and generalisation.

The analysis of the cases followed the structure of the study and included: a chronological account and contextual analysis of the documented events; a comparative analysis of the mechanisms of pressure applied; and a legal assessment of the actions of state authorities in the light of national legislation and the provisions of the ECHR.

The legal analysis of compliance with national legal standards was conducted using a comprehensive approach combining normative legal, practice-oriented, and comparative methods. The assessment examined whether the actions, decisions, and omissions of the pre-trial investigation authorities and investigating judges complied with the national procedural standards established by the Constitution of Ukraine, the CPC of Ukraine, and the relevant practice of their application. Particular attention was paid to assessing compliance with the standards of reasonable suspicion, the admissibility and relevance of evidence, the proportionality of interference with property rights, effective judicial oversight, and respect for human dignity.

Compliance of the actions of state authorities with the standards of the ECHR was assessed through an analysis based on the relevant case-law of the ECtHR, in particular concerning the prohibition of inhuman or degrading treatment (Article 3), the right to liberty and security (Article 5), the right to a fair trial (Article 6), the right to respect for private and family life (Article 8), and the prohibition on using restrictions on rights and freedoms for purposes other than those prescribed by the Convention (Article 18). The analysis was conducted taking into account the conditions of martial law and the permissible limits on the restriction of rights in the light of the case-law of the ECtHR.

DATA SOURCES AND RESEARCH MATERIALS

The study is based on an analysis of materials documented and verified in the course of Human Rights Centre ZMINA's work, as well as information obtained from open and professional sources used to verify the facts and provide contextual background to the events.

The study primarily relies on open-source information, including media reports, official communications issued by law enforcement authorities, prosecution services, judicial decisions published in the USRCD, public statements by public officials, and other publicly available materials relevant to reconstructing the chronology of events and analysing the information environment surrounding the documented cases. Not all court decisions have been published in the USRCD, and information concerning the content of certain judicial decisions was provided by lawyers representing anti-corruption actors.

The study also draws on the materials relating to the documented cases, including procedural documents and other sources that made it possible to reconstruct the course of investigative and procedural actions (searches, arrests, the imposition and extension of preventive measures, and other measures to secure criminal proceedings), reconstruct the chronology of events, identify the pre-trial investigation authorities, prosecution bodies, and courts involved, and analyse the decisions they adopted. An additional source for verifying the information consisted of court monitoring reports prepared by Human Rights Centre ZMINA's monitors during their observation of court hearings.

A separate category of sources consists of legal analyses and legal opinions prepared by lawyers directly representing suspects and defendants in the relevant criminal proceedings. These materials were used to analyse the legal classification of criminal offences, the substantiation of reasonable suspicion and the evidentiary basis, the lawfulness of arrests, searches, property seizure orders, and the application of preventive measures, as well as the actions of investigators, prosecutors, and judges in the light of national legislation and human rights standards.

All materials used in the study were cross-checked against multiple sources. Information that may be subject to the confidentiality of pre-trial investigations was used only to the extent that it had been disclosed during court hearings or through official public sources.

TEMPORAL SCOPE OF THE STUDY

The study covers an eleven-month period, from July 2025 to May 2026. The starting point of the study is 11 July 2025, the date of the first documented criminal proceedings and investigative actions involving an anti-corruption actor. The end point of the study is May 2026, allowing for the inclusion of subsequent developments in those criminal proceedings, the related judicial decisions, and their consequences. Events falling outside this temporal scope are analysed only to the extent necessary to explain the context of the documented cases.

GEOGRAPHICAL SCOPE OF THE STUDY

The study covers the territory of Ukraine where state authorities exercise their powers in accordance with national legislation. The analysis includes investigative, procedural, and judicial actions carried out by the Ukrainian authorities in territories under Ukraine's control and within the jurisdiction of the national legal system.

The study does not cover the TOT of Ukraine, as investigative, procedural, and judicial actions by the Ukrainian state authorities are not carried out there within the framework of the national legal system, making their analysis under this study's methodology impossible.

The geographical focus is determined by the location where investigative, procedural, and judicial actions were carried out in the individual cases and is not limited to particular regions, as the documented practices are interregional in nature and are linked to the activities of central state authorities.

INSTITUTIONAL SCOPE OF THE STUDY

The institutional scope of the study is defined by the range of state authorities and public officials whose actions and decisions are analysed in the documented cases, namely:

- pre-trial investigation authorities, including the SSU, the SBI, and other law enforcement authorities;
- the prosecution service, including the OPG, responsible for prosecutorial supervision and the conduct of public prosecution;
- courts of general jurisdiction and investigating judges who adopted procedural decisions in the relevant criminal proceedings.

The study also analyses the interaction between these authorities and actors, as well as their public communications, insofar as they are relevant to assessing compliance with human rights, fair trial standards, and the principle of the rule of law.

LIMITATIONS OF THE STUDY AND CAVEATS

The study is subject to a number of objective limitations arising both from the nature of its subject matter and from the context in which it was conducted. First, it is based on an analysis of cases of persecution of anti-corruption actors investigating high-level corruption documented by Human Rights Centre ZMINA and does not seek to provide an exhaustive account of all possible instances of pressure or persecution that may have occurred during the relevant period. The sample of cases is based on the available documentary evidence and access to verifiable information.

Second, the analysis is based primarily on open-source information, procedural documents, testimonies from anti-corruption actors, court monitoring reports, and legal opinions prepared by lawyers. The study does not involve access to the complete body of pre-trial investigation materials that have not been publicly disclosed or examined during court hearings. Accordingly, the assessment of particular aspects of the proceedings is confined to the available and verified information.

Third, the study is not intended to determine the criminal liability of particular individuals or to assess the guilt or innocence of suspects and defendants. The analysis is confined exclusively to assessing the actions of state authorities in terms of compliance with procedural guarantees, national legislation, and international human rights standards.

A further limitation arises from the legal regime of martial law, which permits the application of special procedural mechanisms and restrictions on rights. The study takes this context into account but does not proceed on the assumption that any restriction is permissible solely because martial law is in force. Rather, the analysis seeks to determine whether such restrictions complied with the requirements of legality, necessity, and proportionality.

In addition, the legal analyses and opinions prepared by lawyers and relied upon in the study are treated as the professional position of the defence and are not regarded as independent evidence of violations unless corroborated by other sources. All conclusions are based on the totality of the available materials, which were cross-checked against multiple sources.

These limitations do not diminish the value of the findings but define the scope within which the study's conclusions should be interpreted and should be taken into account when they are used in human rights, analytical, or advocacy work.

ETHICAL PRINCIPLES AND CONFIDENTIALITY

The study was conducted in accordance with the fundamental ethical principles of human rights work, including good faith, accuracy, the principle of minimising harm, and respect for the rights and dignity of individuals who have been subjected to persecution. All analytical conclusions were based on verified facts and documentary evidence, without distorting the factual circumstances or making selective use of information. No information obtained in violation of the law or through interference with individuals' private lives was used in the study. Data containing sensitive information or information capable of jeopardising the safety of individuals, their families, or their professional activities were handled with particular care and used only to the extent necessary to achieve the objectives of the study.

The study does not disclose information covered by the confidentiality of pre-trial investigations, except where such information was publicly disclosed during court hearings, published through official sources, or made public by public officials. The study is intended to analyse the actions of state authorities and institutions and does not seek to attribute personal responsibility beyond the scope of legal analysis. The material is presented in a manner consistent with the standards of professional ethics and designed to avoid creating additional risks for participants in the proceedings or for third parties.

The study contains photographs documented in the course of the recorded cases, including images of bodily injuries sustained by anti-corruption actors during arrests or other procedural actions. These materials are included solely for the purposes of factual documentation and human rights analysis. Owing to their sensitive nature, some of the images may be distressing to certain readers.

GLOSSARY

Due process the conduct of criminal proceedings in a manner consistent with the Constitution of Ukraine, the CPC of Ukraine, and international standards governing criminal proceedings.

Covert investigative (search) actions a category of investigative actions the facts and methods of which are not subject to disclosure. These include: audio and video surveillance of a person; seizure, inspection, and examination of correspondence; interception of information transmitted through electronic communications networks; retrieval of information from electronic information systems; inspection of publicly inaccessible places, a dwelling, or other property in a person's possession; determination of the location of radio equipment (radio electronic devices); surveillance of a person, object, or place; monitoring of bank accounts; audio and video surveillance of a location; control over the commission of a crime; and carrying out a special assignment to uncover the criminal activities of an organised group or criminal organisation.

Persecution the use of criminal law, procedural, administrative, or other measures against an individual for the purpose of restricting their activities, intimidating them, or punishing them for their professional or civic anti-corruption work, including through the selective or disproportionate application of legal mechanisms or their abusive use.

Positive obligations of the state the obligations of state authorities to take active measures to ensure the protection of human rights, including the protection of life and health, the provision of adequate conditions of detention, access to medical care, and the protection of persons under the control of the state.

Legal certainty a component of the rule of law requiring procedural decisions and their consequences for individuals to be clear, foreseeable, and consistent.

Procedural form the procedure prescribed by criminal procedural law for carrying out procedural actions and adopting procedural decisions.

Procedural coercion the application by competent state authorities of procedural measures involving physical or psychological coercion in order to ensure the proper procedural conduct of participants in criminal proceedings, secure compliance with procedural obligations, prevent obstruction of criminal proceedings, and achieve the objectives of the proceedings, where such measures involve the temporary restriction of an individual's rights and freedoms.

Physical evidence material objects that were used as instruments of a criminal offence, have retained traces of it, contain other information relating to the circumstances of the criminal offence, or were themselves the objects of criminally unlawful acts.

Investigative (search) actions procedural actions regulated by criminal procedural law and carried out by the prosecution for the purpose of collecting (preserving) or verifying evidence already obtained during the pre-trial investigation in a specific criminal proceeding. They include: questioning, including the simultaneous questioning of two or more previously questioned persons, and questioning by videoconference; identification procedures involving persons, objects, or a body; searches; inspections of a crime scene, terrain, premises, a dwelling or other property in a person's possession, objects and documents, a body in connection with exhumation, and the scene of a criminal offence; investigative experiments; medical examination of a person; and the appointment of an expert and the conduct of a forensic examination.

Defence the suspect, the accused (defendant), the convicted person, the acquitted person, and their defence lawyers and legal representatives.

Prosecution the investigator, the inquiry officer, the head of the pre-trial investigation authority, the head of the inquiry body, and the prosecutor.

Judicial oversight the activities of an investigating judge or a court aimed at ensuring a genuine review of the legality, justification, necessity, and proportionality of restrictions on human rights in criminal proceedings.

High-level corruption corrupt conduct committed by senior public officials, namely individuals holding the highest or particularly responsible public offices and exercising significant influence over state decision-making.

Protest against the restriction of NABU and SAPO powers, Kyiv, 24 July 2025. Photo credit: Inna Varenytsia

CONTEXT

The Revolution of Dignity, which began as a protest against the government's decision not to sign the Association Agreement with the EU, marked Ukraine's choice in favour of a European path. Ukrainian society rejected a model in which corruption, selective justice, and the close ties between politics and big business shaped the functioning of the state, and instead demanded reforms based on transparency, democracy, the rule of law, and accountability for high-level corruption[2].

2 The State of Corruption in Ukraine: A Comparative Analysis of Nationwide Surveys Conducted in 2007, 2009, 2011 and 2015. Kyiv International Institute of Sociology (KIIS). Kyiv, 2015: https://kiis.com.ua/materials/pr/20161602_corruption/Corruption%20in%20Ukraine%202015%20UKR.pdf

Following the fall of the Viktor Yanukovych regime, combating corruption became, for the first time, one of the state's policy priorities, leading to the establishment of specialised anti-corruption institutions with the support of Ukraine's international partners. In 2015, the National Anti-Corruption Bureau of Ukraine (NABU), the Specialised Anti-Corruption Prosecutor's Office (SAPO), and the National Agency on Corruption Prevention (NACP) became operational. In 2019, they were joined by the High Anti-Corruption Court (HACC), which was granted exclusive jurisdiction over cases investigated by NABU and prosecuted by SAPO. From the outset, however, these institutions operated in the face of persistent institutional resistance from parts of the "old" law enforcement system and the political elite.

The new anti-corruption institutions operated alongside the traditional law enforcement agencies – the Prosecutor General's Office of Ukraine (PGO), the Security Service of Ukraine (SSU), and the police – where parts of the leadership and the prosecutorial corps viewed them as a threat to their powers and established practices. As early as 2016, this developed into an open conflict between NABU and the PGO, manifested in attempts to search the Bureau's premises[3], interference with its operational and technical activities, and the forceful detention of officers[4], conducting covert surveillance of prosecutors. NABU characterised these actions as unlawful interference and an attempt to intimidate detectives investigating abuses within the prosecution service itself.

A separate episode concerned criminal proceedings initiated by the PGO against NABU in connection with a bribery case involving Kyiv tax officials. During the investigation in 2016, NABU searched the office of Serhii Tarasiuk, a lawyer, and seized his legal case file and electronic devices. The Ukrainian National Bar Association stated[5] that the search had been conducted in breach of the guarantees protecting the legal profession, referred the matter to the PGO, and the latter opened criminal proceedings against NABU officers for interfering with a lawyer's professional activities. NABU, for its part, maintained that it had acted in accordance with the law and regarded the episode as another means of exerting pressure on the Bureau through the use of disciplinary and criminal measures against its staff.

In 2017, the conflict between the newly established anti-corruption institutions and the "old" law enforcement system escalated following the disruption by the SSU and the PGO of an undercover NABU operation within the State Migration Service[6]. Yurii Lutsenko, Prosecutor General, publicly accused NABU of using "unlawful methods", while the Bureau, in an official statement, described the actions of the SSU and the PGO as a deliberate act of sabotage against anti-corruption efforts.

In 2018–2019, conflicts surrounding the anti-corruption system assumed a more structured political and legislative dimension. Legislative initiatives were registered in the VRU that would have simplified the procedure for dismissing the Director of NABU or increased the influence of the Prosecutor General and other authorities over the Bureau's activities. Artem Sytnyk, Director of NABU, who headed the Bureau from 2015 to 2022, became a particular target of political attacks after a court found him guilty in 2019 of an administrative offence relating to restrictions on the acceptance of gifts. This led to Sytnyk's inclusion in the NACP Register of Corrupt Officials and was subsequently used to justify attempts to remove him from office[7].

Later, in 2025, the ECtHR, in Sytnyk v. Ukraine, found that the administrative proceedings against the Director of NABU and his subsequent inclusion in the NACP Register of Corrupt Officials had involved serious violations of the right to a fair trial and the right to respect for private life. The Court further held that, taken as a whole, the circumstances of the case pointed to a predominantly improper purpose – namely, undermining his professional and moral reputation as a senior anti-corruption official[8]. The judgment cast doubt on the legitimacy of the pressure mechanisms employed in 2018–2019 and, at the

3 Prosecutor General's Office conducted a search at NABU. BBC News Ukrainian, 4 August 2016: https://www.bbc.com/ukrainian/politics/2016/08/160805_nabu_gpu_vs

4 PGO–NABU confrontation: NABU accuses the PGO of unlawfully detaining its employees. Deutsche Welle (DW), 16 August 2016: https://www.dw.com/uk/набу-закидає-гпу-незаконне-утримування-своїх-працівників/a-19475998

5 Prosecutor General's Office opens criminal proceedings against NABU employees over the search of lawyer Tarasiuk. Interfax-Ukraine, 16 February 2016: https://interfax.com.ua/news/general/364542.html

6 Detention of a NABU undercover agent: war on corruption or a struggle for influence? BBC News Ukrainian, 29 November 2017: https://www.bbc.com/ukrainian/features-42181323

7 Anti-Corruption Bureau Director Sytnyk included in the Register of Corrupt Officials. Ukrainska Pravda, 18 December 2019: https://www.pravda.com.ua/news/2019/12/19/7235324/

8 Case of Sytnyk v. Ukraine, Application no. 16497/20, Judgment (ECtHR), 23 April 2025: https://hudoc.echr.coe.int/eng?i=001-242999

same time, exposed systemic shortcomings in the legal framework governing the Register of Corrupt Officials and its application. Although some of these shortcomings were subsequently addressed through legislative amendments[9], the ECtHR's findings also highlight broader risks associated with the use of legal mechanisms to discredit anti-corruption officials.

Alongside these institutional conflicts, the decisions of the Constitutional Court of Ukraine increasingly shaped the anti-corruption system, particularly those concerning key elements of anti-corruption legislation and the status of anti-corruption institutions. On 26 February 2019, the Constitutional Court declared Article 368-2 of the Criminal Code of Ukraine, which criminalised illicit enrichment, unconstitutional[10]. This effectively led to the closure of a number of NABU[11] criminal proceedings. Following the ruling, NABU lost the criminal-law basis for pursuing such cases, and the proceedings were discontinued. On 28 August 2020, in Decision No. 9-r/2020, the Constitutional Court declared unconstitutional the Decree of President Petro Poroshenko appointing Artem Sytnyk as Director of NABU, finding that the President had exceeded his constitutional powers. This created legal uncertainty regarding the status of the Bureau's Director and intensified political pressure on the institution[12]. In October of the same year, the Constitutional Court, in a separate judgment, declared Article 366-1 of the Criminal Code of Ukraine, which established criminal liability for knowingly submitting false asset declarations, unconstitutional[13]. This significantly weakened the powers of the NACP and the overall architecture of Ukraine's anti-corruption legislation, prompting strong criticism from Ukrainian civil society[14] and international partners.[15].

In the same year, 2020, another major point of confrontation emerged in the "Tatarov case". According to NABU and SAPO, Oleh Tatarov, Deputy Head of the Office of the President, was involved in aiding the transfer of an undue advantage to an official of an expert institution of the Ministry of Internal Affairs in exchange for preparing a knowingly false expert opinion. This formed part of a broader investigation into the misappropriation of National Guard funds allocated for housing construction, in which former Member of Parliament and property developer Maksym Mykytas was the principal suspect[16]. At the point when the anti-corruption authorities were preparing to serve Tatarov with a notice of suspicion, Iryna Venediktova, Prosecutor General, replaced the group of prosecutors assigned to the proceedings, after which the case was transferred from NABU to the SSU[17]. NABU and SAPO publicly stated that these actions were contrary to the provisions of the CPC governing investigative jurisdiction in corruption cases and regarded both the replacement of the prosecutors and the removal of the case as politically motivated interference in an investigation involving a senior public official.[18].

9 In 2023, amendments were introduced to the legislation removing the possibility of entering into the Register of Corrupt Officials persons held administratively liable for corruption-related administrative offences; Law of Ukraine "On Amendments to the Code of Ukraine on Administrative Offences, the Criminal Code of Ukraine, the Criminal Procedure Code of Ukraine, and Other Legislative Acts of Ukraine on Strengthening Liability for Corruption or Corruption-Related Offences" No. 4496-IX, dated 17 June 2025: https://surl.li/obqqyl

10 Decision of the Constitutional Court of Ukraine No. 1-r/2019 of 26 February 2019 in the case concerning the constitutional petition of 59 Members of Parliament of Ukraine regarding the conformity of Article 368-2 of the Criminal Code of Ukraine with the Constitution of Ukraine (constitutionality): https://ccu.gov.ua/dokument/1-p2019

11 "Closure of 65 NABU cases and the loss of an IMF tranche: the consequences of the Constitutional Court's decision", Ukrainska Pravda, 27 February 2019: https://www.pravda.com.ua/articles/2019/02/27/7207791/

12 Decision of the Constitutional Court of Ukraine No. 9-r/2020 of 28 August 2020 in the case concerning the constitutional petition of 51 Members of Parliament of Ukraine regarding the conformity of the Presidential Decree "On the Appointment of A. Sytnyk as Director of the National Anti-Corruption Bureau of Ukraine" with the Constitution of Ukraine: https://ccu.gov.ua/dokument/9-r2020

13 Decision of the Constitutional Court of Ukraine No. 13-r/2020 of 27 October 2020 in the case concerning the constitutional petition of 47 Members of Parliament of Ukraine regarding the conformity of certain provisions of the Law of Ukraine "On Preventing Corruption" and the Criminal Code of Ukraine with the Constitution of Ukraine (constitutionality) (concerning criminal liability for knowingly submitting false asset declarations): https://ccu.gov.ua/dokument/13-r2020

14 "The Constitutional Court: How a Minority Can "Legally" Destroy Ukraine", Ukrinform, 28 October 2020: https://www.ukrinform.ua/rubric-polytics/3125672-ksu-ak-mensist-moze-zakonno-rujnuvati-ukrainu.html

15 "EU Ambassador: The New Law on Liability for Asset Declarations Needs to Be Improved and Strengthened", Radio Free Europe/Radio Liberty, 9 December 2020: https://www.radiosvoboda.org/a/news-deklaruvannia-ksu/30992536.html

16 "Yermak's Deputy Oleh Tatarov Served with a Notice of Suspicion", Radio Free Europe/Radio Liberty, 18 December 2020: https://www.radiosvoboda.org/a/news-tatarov-pidozra/31007889.html

17 "Notice of Suspicion Prepared for Yermak's Deputy, but Venediktova Halted Its Service", Ukrainska Pravda, 2 December 2020: https://www.pravda.com.ua/news/2020/12/02/7275644/; Prosecutor General's Office Took Tatarov's Case from NABU and Transferred It to the SSU", Ukrainska Pravda, 24 December 2020: https://www.pravda.com.ua/news/2020/12/24/7278024/

18 "The Decision to Transfer the Case Concerning the Deputy Head of the Presidential Office to the SSU in the Manner It Was Carried Out Demonstrates the Prosecutor General's Office's Unprecedented and Extraordinary Attention to This Particular Case", NABU Facebook page, 24 December 2020: https://www.facebook.com/nabu.gov.ua/posts/pfbid02FAvq33iymZHXoLKCqj7kj83no2txeE3ySH3SvYpQPcMbDtqKfNxvxfggNerpeMFel

In addition to direct procedural interference, the authorities also employed institutional blocking tactics, primarily by delaying appointments to key positions within the independent anti-corruption institutions. Although the selection commission identified Oleksandr Klymenko as the successful candidate for the post of Head of SAPO as early as December 2021, the formal approval of the competition results and his appointment were delayed until July 2022. This occurred despite concerns expressed by civil society organisations, the EU, and the United States, all of which regarded the appointment as a key condition for continued financial and political support for Ukraine[19]. International partners and Ukrainian anti-corruption organisations repeatedly stated that the delay in appointing the Head of SAPO was politically motivated. The EU and the United States publicly expressed "disappointment at the unexplained and unjustified delays" and linked the completion of the selection process to their continued support for Ukraine[20], while leading civil society experts spoke of "sabotage" by the government-aligned members of the commission, stressing that the absence of an independent Head of SAPO allowed political influence over the anti-corruption prosecution service to persist and investigations into high-level officials to be delayed[21].

Alongside the pressure exerted on the state anti-corruption institutions, pressure on civil society also intensified. The Anti-Corruption Action Centre (AntAC), one of Ukraine's leading anti-corruption organisations, which played a key advocacy role in the establishment of NABU and SAPO, became the target of a sustained campaign combining criminal proceedings, financial inspections, physical attacks, and prolonged media discreditation campaigns[22].

As early as 2016, investigators from the PGO, citing suspicions of the misappropriation of international technical assistance funds, obtained court authorisation to access the organisation's internal and banking records[23]. Those allegations were subsequently refuted by official letters from the United States Embassy and the International Development Law Organization (IDLO), and the proceedings were closed for lack of the elements of a criminal offence. Nevertheless, the financial information obtained from AntAC continued to be used in media and political attacks. In 2017, the pressure evolved into a campaign of public discreditation targeting AntAC's leadership. Allegations concerning the "diversion of grant funds"[24] formed the basis for actions by the State Fiscal Service relating to the alleged non-payment of taxes, although these allegations were later found to be unfounded[25].

After AntAC filed a lawsuit against the SSU challenging the classification of asset declarations submitted by the agency's leadership, the organisation documented the beginning of a targeted campaign that included planted questions at press conferences about the income of AntAC Chair Vitaliy Shabunin, pickets outside his home demanding that he "declare his assets", and the leaking of activists' personal data to the media. During the same period, the online channel "Holos Narodu" ("Voice of the People") systematically monitored and filmed AntAC leaders Vitaliy Shabunin, Daria Kaleniuk, and Oleksandra Ustinova using information obtained from law enforcement authorities. The channel has been linked to Vsevolod Filimonenko, blogger, who is currently subject to sanctions as a pro-Russian propagandist[26].

A separate criminal case against Shabunin on charges of assaulting Filimonenko[27] arose from the altercation between them on 8 June 2017, which, according to AntAC, had been preceded by prolonged

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19 "Oleksandr Klymenko Appointed Head of the SAPO", DeJure Foundation, 27 July 2022: https://dejure.foundation/kh80txl4r1-oleksandra-klimenka-priznachili-kervniko/

20 "The EU and the United States Are Deeply Disappointed by the Unexplained and Unjustified Delays in Appointing the Head of the Specialised Anti-Corruption Prosecutor's Office", U.S. Embassy Kyiv Facebook page, 9 October 2021: https://www.facebook.com/usdos.ukraine/posts/10159314394101936/

21 "Zelenskyy's Sabotage? Who Is Blocking the Appointment of the Anti-Corruption Prosecutor?", hromadske, 7 February 2022: https://hromadske.ua/posts/sabotazh-zelenskogo-hto-blokuye-priznachennya-antikorupcijnogo-prokurora

22 "Attacks on AntAC", Anti-Corruption Action Centre, special project "Attacks on AntAC": https://antac.org.ua/special-projects/attacks-on-antac/

23 "Court Authorises Seizure of Anti-Corruption Action Centre Documents", Ukrainska Pravda, 25 March 2016: https://www.pravda.com.ua/news/2016/03/25/7103364/

24 "Attacks on AntAC", Anti-Corruption Action Centre, special project "Attacks on AntAC": https://antac.org.ua/special-projects/attacks-on-antac/

25 Ruling of the Kyiv Court of Appeal of 30 January 2018 in case No. 757/34189/17-c: https://reyestr.court.gov.ua/Review/72008763

26 In 2024, Filimonenko appeared in a propaganda video by Russia's Channel One entitled "Zelenskyy and His Combat Drug Addicts", aimed at discrediting the AFU.

27 "Shabunin Sprayed in the Face with Pepper Spray Near a Military Recruitment Office", Ukrainska Pravda, 8 June 2017: https://www.pravda.com.ua/news/2017/06/08/7146315/

surveillance and the production of discrediting materials[28]. The prosecution subsequently reclassified the case from intentional bodily harm to violence against a journalist – a decision criticised as early as 2018 by media and human rights organisations[29], which argued that the relevant criminal provisions were being used to persecute government critics. On 13 May 2026, the Dniprovskyi District Court of Kyiv found Shabunin guilty under Article 345-1(2) of the Criminal Code of Ukraine (violence against a journalist), but imposed no sentence because the limitation period had expired, requiring him only to reimburse the costs of forensic examinations[30]. The defence, maintaining that the medical evidence was unreliable and that the proceedings were politically motivated, announced its intention to appeal the judgment. Notably, the person recognised as the injured journalist in the case was later made subject to ten-year sanctions imposed by the NSDC in September 2025 for pro-Russian propaganda activities.

Allegations of "draft evasion" became an additional instrument of pressure. In May–June 2017, military recruitment officers, accompanied by unidentified individuals carrying cameras, served Vitaliy Shabunin with a draft notice, while anonymous "veterans" groups and the same pseudo-journalists publicly accused him of evading military service, despite the fact that he was not legally subject to mobilisation and had been classified as "fit for limited military service" as early as 2005[31]. AntAC later obtained documentary evidence indicating that the operation had been organised at the request of the Military Prosecutor's Office, against which the organisation had recently filed a lawsuit challenging the unlawful classification of officials' asset declarations[32].

Vsevolod Filimonenko sprays pepper spray into Vitaliy Shabunin's face, 8 June 2017.
Photo credit: Detector Media

In July 2018, during a peaceful protest calling for the resignation of the then Head of SAPO, Nazar Kholodnytskyi, Shabunin was attacked when a group of men in military uniforms threw zelenka (brilliant green antiseptic solution) into his face, causing chemical burns to both eyes[33]. According to eyewitnesses, the police did not intervene, and the investigation into the attack was effectively stalled. AntAC linked the organisation of the attack to individuals associated with the then Minister of Internal Affairs, Arsen Avakov, whose resignation the organisation had consistently demanded. In July 2020, unknown individuals set fire to Shabunin's house, rendering it uninhabitable[34]. Later that year, in December, improvised explosive devices were discovered outside the apartment of Shabunin's mother in Rivne and the home of his wife's parents in Kyiv. AntAC likewise regarded these incidents as attempts at intimidation[35], while the ensuing criminal investigations failed to identify those who had organised or commissioned them.

28 "An Information Attack – and More – Against the Anti-Corruption Action Centre: What Happened and Who Is Behind It", NV, 9 June 2017: https://surl.li/iyfajv

29 "Shabunin Case Is Unrelated to Filimonenko's Journalistic Activities, NGO Says", Detector Media, 18 January 2018: https://detector.media/community/article/133841/2018-01-18-sprava-shabunina-ne-povyazana-z-zhurnalistskoyu-diyalnistyu-filimonenka-zayava-go/

30 "AntAC Chair Vitaliy Shabunin Found Guilty in the Assault Case Involving Pro-Russian Blogger Filimonenko; Defence Preparing an Appeal", ZMINA, 13 May 2026: https://zmina.info/news/ochilnyka-czpk-vitaliya-shabunina-vyznaly-vynnym-u-spravi-pro-pobyttya-prorosijskogo-blogera-filimonenka-zahyst-gotuye-apelyacziyu/

31 "Activist Shabunin Summoned to a Military Recruitment Office Despite Being Declared Unfit for Service", ZMINA, 7 June 2017: https://zmina.info/news/_aktivista_shabunina_viklikajiut_do_vijskkomatu_khocha_vin_viznanij_nepridatnim-2/

32 "Shabunin's Military Recruitment Summons Was Issued on Matios's Instructions, Document Shows", Anti-Corruption Action Centre, 4 March 2020: https://antac.org.ua/news/povistku-do-vijskkomatu-shabuninu-prynesly-za-vkazivkoyu-pidlehlyh-matiosa-dokument/

33 "Today Outside the SAPO, a Group of Unknown Individuals Doused Vitaliy Shabunin with Brilliant Green", Anti-Corruption Action Centre (AntAC) X (formerly Twitter) account (@zer0corruption_), 16 July 2018: https://x.com/zer0corruption_/status/1019145110846689280

34 "Activist Shabunin's House Set on Fire Overnight (Updated)", ZMINA, 23 July 2020: https://zmina.info/news/aktyvistu-shabuninu-vnochi-pidpalyly-budynok/

35 "Explosive Device Planted Outside the Apartment of Activist Shabunin's Mother", ZMINA, 31 December 2020: https://zmina.info/news/materi-aktyvista-shabunina-pidklaly-vybuhivku-pid-kvartyru/

Russia's full-scale invasion of Ukraine in 2022 fundamentally changed the context in which anti-corruption work was carried out. Martial law reduced opportunities for public oversight and access to information. The sharp increase in defence spending and international assistance heightened corruption risks. In these circumstances, anti-corruption criticism was increasingly countered by arguments based on national security, creating new forms of indirect pressure.

Between 2022 and 2024, investigative journalists and civil society organisations, including Bihus. Info, Nashi Hroshi, AntAC, and regional anti-corruption initiatives, faced discreditation campaigns, interference with their private lives, summonses for questioning, and attempts to delegitimise their professional activities. In January 2024, the Bihus.Info team became the target of covert surveillance[36]. Videos recorded by hidden cameras during the journalists' private trip to a country house, together with audio recordings of their conversations, were published online. The outlet's own investigation indicated that officers of the DPNS SSU had been involved in the physical surveillance operation. Following these revelations, the SSU announced an internal investigation, the dismissal of several officers, and the opening of criminal proceedings concerning abuse of authority. Nevertheless, the journalistic and human rights communities regarded the use of covert surveillance against investigative journalists as a dangerous precedent for media freedom under martial law[37].

Another illustrative example of pressure involved Yurii Nikolov, an investigative journalist and co-founder and editor of the "Nashi Hroshi" project, who, in January 2024, became the target of a public discreditation campaign based on allegations of "draft evasion". Unknown individuals attempted to force their way into his apartment, damaging the entrance door while shouting accusations at him. Nikolov directly linked the incident to his investigations into defence procurement by the Ministry of Defence[38].

Human rights organisations and civil society coalitions documented similar incidents involving regional anti-corruption activists, pointing to the use of criminal proceedings and mobilisation mechanisms as instruments of retaliation by local elites and law enforcement agencies. One prominent example is Dmytro Bulakh, Chair of the Kharkiv Anti-Corruption Centre (KhAC), who was brutally attacked outside his home in Kharkiv in 2017. Two unidentified assailants struck him from behind, inflicting multiple injuries, including fractured ribs and a broken jaw[39]. Bulakh and human rights organisations linked the attack to his anti-corruption work as a regional councillor and head of an organisation exposing abuses by the local authorities. In 2024, while serving in the National Guard of Ukraine, officers of the SBI and the SSU searched his home as part of criminal proceedings concerning alleged irregularities related to his enlistment for military service[40].

Against the backdrop of these and other incidents, in April 2024 a number of media and human rights organisations, including Human Rights Centre ZMINA, Detector Media, AntAC, Institute of Mass Information, Ukrainian Helsinki Human Rights Union, Transparency International Ukraine and others, issued a joint statement calling on the President, law enforcement authorities, and local self-government bodies to end the persecution of anti-corruption activists and investigative journalists. The statement highlighted a worrying trend of using criminal proceedings, the mechanisms of the TCR and SS, and discreditation campaigns against those exposing corruption in the defence sector and in the mobilisation process[41].

However, 2025 proved to be the most challenging year for Ukraine's anti-corruption system. From the beginning of the year, there was a marked increase in disinformation and discreditation campaigns targeting NABU and SAPO, individual Bureau detectives, and civil society anti-corruption activists,

36 "We Found Them! The SSU's Special Operation Against Journalists: Faces, Names, and Consequences", Bihus.Info YouTube channel, 4 February 2024: https://www.youtube.com/watch?v=nv4qSv8xSe0

37 "Pressure on Journalists? What the Bihus.Info Case Reveals", Radio Free Europe/Radio Liberty, 16 January 2024: https://www.radiosvoboda.org/a/zhurnalisty-kazhut-pro-tysk-keys-bihus-info/32778338.html

38 "Attack on Journalist Yurii Nikolov's Apartment: Police Say They Have Identified Those Involved", Detector Media, 14 January 2024: https://surl.li/tqzfkp

39 "Head of the Kharkiv Anti-Corruption Centre, Dmytro Bulakh, Beaten in Kharkiv", Reanimation Package of Reforms, 29 August 2017: https://rpr.org.ua/news/u-harkovi-pobyly-holovu-pravlinnya-harkivskoji-antykoruptsijnoho-tsentru-dmytra-bulaha-onovlyuetsya/

40 "The SBI and the SSU Conduct Searches at the Home of the Head of the Kharkiv Anti-Corruption Centre", ZMINA, 10 April 2024: https://zmina.info/news/dbr-spilno-z-sbu-provely-obshuk-u-kerivnyka-harkivskogo-antykorupczijnogo-czentru-dmytra-bulaha/

41 "Civil Society Calls for an End to the Persecution of Anti-Corruption Activists and Investigative Journalists", ZMINA, 12 April 2024: https://zmina.info/statements/gromadskist-vymagaye-prypynyty-peresliduvannya-antykorupczijnyh-aktyvistiv-ta-zhurnalistiv-rozsliduvachiv/

alongside the emergence of new forms of institutional pressure on the anti-corruption institutions. These developments unfolded in parallel with the intensification of high-profile investigations involving senior public officials, creating a politically and legally charged context for the events that followed.

On 22 June 2025, NABU served a notice of suspicion on Oleksii Chernyshov, former Deputy Prime Minister[42], while on 15 July 2025, searches were carried out at the premises of former Deputy Head of the Office of the President Rostyslav Shurma[43]. The extension of investigative measures to individuals occupying the highest levels of the executive branch may have acted as a trigger for discreditation campaigns, as well as for attempts to create additional mechanisms of political and procedural influence over the Bureau's activities.

On 19 June 2025, the Verkhovna Rada of Ukraine, by Resolution No. 4511-IX, established a Temporary Investigative Commission (TIC) to investigate possible corruption offences within law enforcement agencies, the courts, and the judiciary[44]. In the media and public discourse, it became informally known as the "TIC on NABU and SAPO", as a significant part of its work focused specifically on those institutions. Although the Commission's mandate formally concerned the exercise of parliamentary oversight, a number of circumstances raised concerns that it could be used as a mechanism of political pressure. In particular, the Commission's mandate was drafted in broad terms, allowing it to scrutinise the activities of the anti-corruption institutions, including NABU, SAPO, and HACC, without being linked to specific parliamentary investigations. This opened the possibility of requesting information on confidential expenditures and holding public hearings concerning their activities. According to expert assessments, the establishment of the TIC was viewed as one of the possible mechanisms for exerting influence over the anti-corruption institutions amid the growing political tensions surrounding their work[45].

The open phase of the confrontation began on 11 July 2025, when the SBI served a notice of suspicion on Vitaliy Shabunin, Chair of AntAC, accusing him of draft evasion and fraud. On the same day, searches were carried out at his home in Kyiv and his temporary accommodation in Kharkiv without the requisite authorisation from an investigating judge, despite the fact that the criminal proceedings had been registered as early as 2023. These events followed immediately after Shabunin's unexpected transfer to another military brigade, marking what may have been the beginning of a coordinated campaign against Ukraine's anti-corruption infrastructure aimed at discrediting and neutralising key civil society activists ahead of the subsequent actions targeting NABU and SAPO.

Ten days later, on 21 July 2025, while the leadership of NABU and SAPO were on an official visit abroad, the SSU and the SBI carried out approximately 30–70 searches (the exact number remains unknown) involving at least 19 NABU employees and their relatives[46]. The searches targeted senior detectives and heads of investigative units responsible for high-profile investigations involving senior public officials, including officials from the OP and the SSU.

The searches were conducted without court warrants, and in some instances SSU officers used physical force against detectives in order to gain access to their mobile phones. The seizure of electronic devices extended beyond the scope of the specific criminal proceedings: investigators confiscated devices that had no apparent connection to the cases, as well as storage devices belonging to family members who had no procedural status in the proceedings. The detectives' devices also contained official information, including investigative materials and data relating to confidential operatives. The procedural actions were carried out in both recently registered criminal proceedings and cases that had been opened much earlier – for example, proceedings arising from a road traffic accident in 2021.

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42 "NABU Serves Deputy Prime Minister Oleksii Chernyshov with a Notice of Suspicion in a Large-Scale Corruption Case", Suspilne News, 22 June 2025: https://surli.cc/ueujuf

43 "NABU Director Confirms Search of Former Deputy Head of the OP Rostyslav Shurma's Home in Germany", Radio Free Europe/Radio Liberty, 1 August 2025: https://www.radiosvoboda.org/a/news-nabu-shurma-obshuk-u-nimechchyni/33492240.html

44 Resolution "On the Establishment of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on the Investigation of Possible Facts of Corruption or Corruption-Related Offences in Law Enforcement Agencies, Courts, and the Judiciary" No. 4511-IX of 19 June 2025: https://zakon.rada.gov.ua/laws/show/4511-20#Text

45 "The Destructive Vlasenko–Buzhanskyi Temporary Investigative Commission Is Attacking Independent Institutions", Ukrainska Pravda, op-ed by the DeJure Foundation, 29 October 2025: https://www.pravda.com.ua/columns/2025/10/30/8005135/; "'They Will Come for Us Too': Who Planned and Carried Out the Operation to Cripple NABU and SAPO", Ukrainska Pravda, 30 July 2025: https://www.pravda.com.ua/articles/2025/07/30/7524042/

46 "Explanation Regarding the Events of 21 July: NABU's Official Position", National Anti-Corruption Bureau of Ukraine, 21 July 2025: https://nabu.gov.ua/news/poiasnennia-shchodo-podiyi-21-lypnia-ofitciyina-pozytciia-nabu/

As a result, five NABU employees were served with notices of suspicion, while two of them – Ruslan Mahamedrasulov and Viktor Husarov – were detained and remanded in custody. NABU's leadership described these measures as an attempt to paralyse the Bureau's work[47] and gain access to official information[48]. According to data collected by Human Rights Centre ZMINA during the preparation of this study, nine NABU employees had their security clearances revoked.

At a joint briefing on 22 July 2025, Vasyl Maliuk, Head of the SSU, and Ruslan Kravchenko, Prosecutor General, stated that the official purpose of the searches conducted at NABU detectives' homes on 21 July 2025 was the *"neutralisation of Russian influence within NABU"*[49]. In particular, Vasyl Maliuk referred to *"individual traitors within the NABU system"*, accusing the head of a detective unit, Ruslan Mahamedrasulov, of *"collaborating with the enemy"* by organising shipments of hemp seeds to Dagestan and maintaining ties with maintaining ties with Fedir Khrystenko, former Member of Parliament from the Opposition Platform – For Life (OPFL)[50].

Vasyl Maliuk, Head of the SSU, and Ruslan Kravchenko, Prosecutor General, during a joint briefing on the searches of NABU employees, 22 July 2025. Screenshot from the TSN YouTube channel

At the same briefing on 22 July 2025, another NABU detective, Viktor Husarov, was accused of passing information to a former deputy head of Viktor Yanukovych's security detail and was described as an *"FSB sleeper agent"*[51].

Later on 22 July 2025, the day after the searches of NABU employees, part of the Verkhovna Rada Committee on Law Enforcement held an unscheduled meeting in the absence of both the Committee Chair and Deputy Chair[52], to consider Draft Law No. 12414[53]. In its original version, the Draft Law concerned amendments to the Criminal Procedure Code of Ukraine relating to the investigation of criminal offences involving persons who had gone missing under martial law. During the meeting, Maksym Buzhanskyi, Member of Parliament, introduced numerous amendments that bore no relation to the subject matter of the Draft Law but instead sought to dismantle the independence of NABU and SAPO by placing them under the control of the Prosecutor General[54]. Later that same day, the Draft Law was adopted in breach of the Verkhovna Rada's Rules of Procedure. In

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47 "Semen Kryvonos, Director of NABU, Explains How the SSU Searches of NABU Staff Affected Their Investigations", Suspilne News, 1 August 2025: https://suspilne.media/1081119-direktor-nabu-rozpoviv-ak-obsuki-sbu-u-pracivnikiv-buro-vplinuli-na-ihni-rozsliduvanna/

48 "Explanation Regarding the Events of 21 July: NABU's Official Position", National Anti-Corruption Bureau of Ukraine, 21 July 2025: https://nabu.gov.ua/news/poiasnennia-shchodo-podiyi-21-lypnia-ofitciyina-pozytciia-nabu/

49 "Searches at NABU! The Law No. 12414 Scandal! Vasyl Maliuk and Ruslan Kravchenko Answer Questions! Full Version", TSN YouTube channel, 22 July 2025: https://youtu.be/xHvAeQZEUb4?si=sMvUWrdcyh6CyYjD

50 At the time the searches were conducted, Fedir Khrystenko was already a suspect in a high treason case. According to the SSU and the OPG, he is believed to have been a recruited FSB agent who, after 2014, participated in pro-Russian activities and in strengthening Russian influence, including within NABU. In 2025, he travelled to the United Arab Emirates, from where he was returned to Ukraine under a political arrangement. He subsequently concluded a plea agreement with the OPG and the SSU, which experts believe may have been linked to his providing testimony against representatives of Ukraine's anti-corruption institutions.

51 "Searches at NABU! The Law No. 12414 Scandal! Vasyl Maliuk and Ruslan Kravchenko Answer Questions! Full Version", TSN YouTube channel, 22 July 2025: https://youtu.be/xHvAeQZEUb4?si=sMvUWrdcyh6CyYjD

52 "Extraordinary Meeting of the Verkhovna Rada Committee on Law Enforcement Held on 22 July 2025", Official website of the Verkhovna Rada Committee on Law Enforcement, 21 July 2025: https://komzakonpr.rada.gov.ua/news/main_news/76331.html.

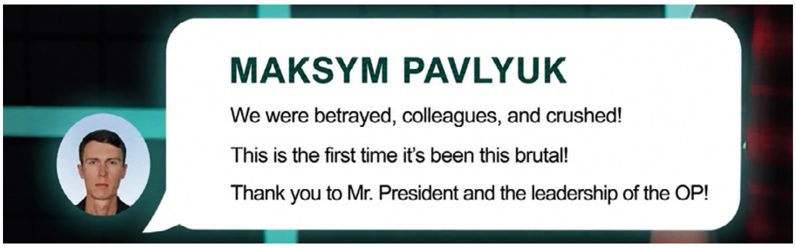
53 Draft Law No. 12414 of 16 January 2025 "On Amendments to the Criminal Procedure Code of Ukraine Regarding the Specifics of the Pre-Trial Investigation of Criminal Offences Related to the Disappearance of Persons Under Special Circumstances During Martial Law": https://itd.rada.gov.ua/billinfo/Bills/Card/55640

54 "Stripping NABU and SAPO of Their Independence: A Legal Analysis of the Amendments to Draft Law No. 12414", Transparency International Ukraine, 22 July 2025: https://ti-ukraine.org/news/pozbavlennya-nezalezhnosti-nabu-ta-sap-yurydychnyj-analiz-zmin-do-zakonoproyektu-12414/

particular, Members of Parliament received the text of the amendments immediately before the vote rather than the required ten days in advance. Nineteen Members of Parliament who had previously been served with notices of suspicion by NABU voted in favour of the Draft Law. The law was signed by the Chair of the Verkhovna Rada and the President and was officially published later that evening.

The speed with which the law was adopted was exceptional. The entire process – from the parliamentary vote (at 13:38) to its signature by the Speaker (by 13:50) and the announcement of its entry into force (at 23:40) – took less than ten hours[55]. By contrast, studies of the legislative process show that the stages of signature by the Chair of the Verkhovna Rada and the President alone take an average of seven and seventeen days respectively, while the slowest laws have taken more than 1,000 days to complete the legislative process[56]. Comparable legislative speed has been recorded in the history of the Verkhovna Rada only under exceptional circumstances, such as the law approving the Presidential Decree introducing martial law[57], which completed all legislative stages within a matter of hours on 24 February 2022. Even during the COVID-19 pandemic, however, the fastest law adopted under an expedited procedure (Law No. 3219 on preventing the spread of COVID-19) still required at least two days[58].

In a press release issued by the Secretariat of the Verkhovna Rada, Law No. 4555 (formerly Draft Law No. 12414) was described as the "Law on the Powers of the Prosecutor General's Office in Cases Involving NABU and SAPO"[59]. This is noteworthy because the Draft Law itself was officially titled "Draft Law on Amendments to the Criminal Procedure Code of Ukraine on Peculiarities of Pre-trial Investigation of Criminal Offenses Related to the Disappearance of Persons Under Special Circumstances in Martial Law".



Frame from a Bihus.Info video analysing messages exchanged in the "Servant of the People" parliamentary faction chat. The image shows a message posted by MP Maksym Pavliuk on 24 July 2025.

Screenshot from the Bihus.Info YouTube channel

According to an analysis by Bihus.Info, messages exchanged in the parliamentary faction chat of Servant of the People indicate that Members of Parliament were convened for the 22 July 2025 sitting under the formal pretext of adopting a resolution allegedly needed for the United States Congress, rather than to vote on legislation affecting the powers of NABU and SAPO[60]. The investigation further suggests that most MPs were unaware of the substance of the amendments. One member of the parliamentary faction described the process as *"a deliberate attempt to push through something everyone knew was complete bullshit"*, adding that *"some simply got carried away by the mood of the crowd"*.

In a public address, President Volodymyr Zelenskyy justified signing the law by arguing that it was necessary to *"cleanse"* the anti-corruption infrastructure of *"Russian influence"*[61]. The adoption of the

55 "Bankova Is Destroying the Independence of SAPO and NABU Through Notorious MPs: How Parliament Voted", CHESNO Movement, 22 July 2025: https://www.chesno.org/post/6518/

56 "How Long Does It Take for an Initiative to Become Law in the Ninth Verkhovna Rada?", CHESNO Movement, 5 January 2025: https://www.chesno.org/post/6277/

57 Law of Ukraine No. 2102-IX of 24 February 2022 "On the Approval of the Presidential Decree "On the Introduction of Martial Law in Ukraine'": https://zakon.rada.gov.ua/laws/card/2102-20

58 Draft Law No. 3219 of 16 March 2020 "On Amendments to Certain Legislative Acts of Ukraine Aimed at Preventing the Emergence and Spread of Coronavirus Disease (COVID-19)": https://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=68397

59 Press Service of the Verkhovna Rada Apparatus. "Law on the Powers of the Office of the Prosecutor General in NABU and SAPO Cases Enters into Force", 22 July 2025: https://www.rada.gov.ua/news/Novyny/264293.html

60 "'This Is Exactly How I Imagined the End of the World": Servant of the People Chat During the Dismantling of NABU and SAPO", Bihus.Info YouTube channel, 6 August 2025: https://www.youtube.com/watch?v=WRgksBVnDnA

61 "The Anti-Corruption Infrastructure Will Continue to Operate, but Without Russian Influence – It Must Be Cleansed of That", Office of the President of Ukraine, presidential video address of 23 July 2025: https://www.president.gov.ua/videos/antikorupcijna-infrastruktura-pracyuvatime-tilki-bez-rosijsk-7853

Draft Law was also welcomed by Yuliia Tymoshenko, leader of the Batkivshchyna parliamentary faction, who described the day as a *“bright day”* marking the end of the *“colonisation of Ukraine”* and accused the anti-corruption institutions of acting as a *“shadow government”*[62]. Vasyl Maliuk, Head of the SSU, likewise effectively endorsed stronger oversight of the anti-corruption institutions. At a joint briefing with Ruslan Kravchenko, Prosecutor General, following the searches of NABU employees, Maliuk remarked that “this is precisely why a Prosecutor General is needed – someone to keep a watchful eye”, implying that the Prosecutor General should play a more active role in intervening in the Bureau’s high-profile investigations[63].

The swift adoption of Draft Law No. 12414 triggered mass protests in Kyiv and other cities across Ukraine[64]. These were the first large-scale protests since the beginning of Russia’s full-scale invasion. Demonstrators called on the President to veto the law. In response to the strong public backlash and growing concern among Ukraine’s international partners[65], President Zelenskyy announced, on the evening of 23 July, the drafting of a new Draft Law (No. 13533) that would restore the independence of NABU and SAPO. On 31 July 2025, while protesters remained gathered outside Parliament, the Verkhovna Rada adopted the new Draft Law by 331 votes, and the President signed it later that same day[66].

Despite the removal of the provisions that posed the greatest threat to NABU and SAPO investigations from the law, pressure on the anti-corruption institutions continued. The two NABU employees detained on 21 July 2025 remained in pre-trial detention, while in September, Bureau employees Vitalii Tiebiekin and Ruslan Mahamedrasulov (who was already being held in the Kyiv SIZO) were served with new notices of suspicion.

Participants in protests against the adoption of Draft Law No. 12414 outside the Ivan Franko National Academic Drama Theatre in Kyiv, 22–23 July 2025.

Photos credit: Viacheslav Ratynskyi and Hanna Meshcheriakova

Beyond the pressure exerted on NABU detectives, the interference also extended to individuals providing them with legal representation and public support. After Olena Shcherban, a lawyer and member of AntAC’s Board, joined the defence team representing Ruslan Mahamedrasulov and publicly

62 “Yuliia Tymoshenko, Leader of Batkivshchyna, Calls the Vote for the Law Eliminating the Independence of NABU and SAPO “a Bright Day””, ZN.UA, 21 July 2025: https://zn.ua/ukr/POLITICS/julija-timoshenko-nazvala-svitlim-dnem-holosuvannja-zakonu-za-likvidatsiju-samostijnosti-nabu-ta-sap.html

63 “Ruslan Kravchenko, Prosecutor General of Ukraine, and Vasyl Maliuk, Head of the SSU, Hold a Briefing on NABU”, Suspilne YouTube channel, 22 July 2025: https://www.youtube.com/watch?v=4GHTDz1Vqy0

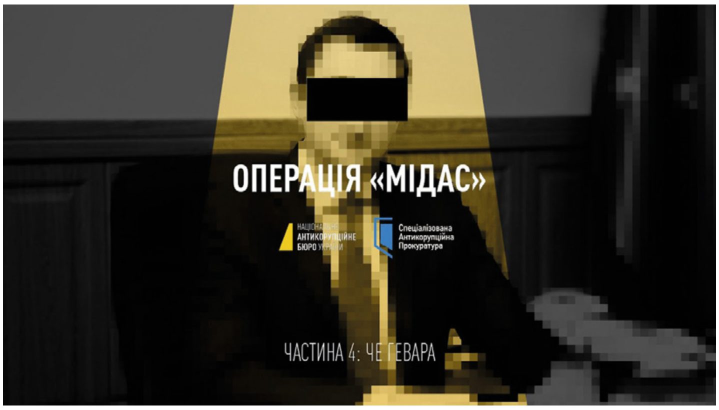
64 “Protests Against the Draft Law Stripping NABU and SAPO of Their Independence Continue in Kyiv and Other Ukrainian Cities”, ZMINA, 22 July 2025: https://zmina.info/news/u-kyyevi-ta-inshyh-mistah-ukrayiny-tryvayut-akcziyi-protestu-proty-zakonoproyektu-shhodo-pozbavlennya-nezalezhnosti-nabu-ta-sap/

65 “The G7 Expresses “Serious Concern” Over the Attack on NABU”, Ukrainska Pravda, 20 July 2025: https://www.pravda.com.ua/news/2025/07/21/7522796/

66 “The Verkhovna Rada Restores the Independence of NABU and SAPO”, BBC News Ukrainian, 31 July 2025: https://www.bbc.com/ukrainian/articles/c5ypddzdg3eo

expressed support for Vitaliy Shabunin, she became the target of disciplinary complaints[67] and a series of discreditation materials published on anonymous Telegram channels. The publications targeted not only Shcherban personally but also members of her family. On 25 September 2025, SSU officers, including officers from the Department for the Protection of National Statehood, searched the home of her brother, Taras Likunov, a former NABU detective who, between 2015 and 2024, had investigated high-level corruption cases, including cases involving SSU personnel. The search was conducted as part of criminal proceedings concerning former Member of Parliament Fedir Khrystenko. The court warrant contained no specific facts establishing any connection between Likunov and the subject matter of the investigation. On the same day, searches were also carried out at the homes of several other former NABU detectives who now work in the Corporate Security Department of Ukrainian Railways (Ukrzaliznytsia).

On 10 November 2025, Operation "Midas" was carried out, accompanied by searches of individuals implicated in the case[68]. On that day, NABU and SAPO conducted a large-scale operation exposing corruption in the energy sector[69]. At the same time, searches were carried out at the premises of Tymur Mindich, businessman, Herman Halushchenko, former Minister of Energy and Justice, and Energoatom. On 11 November 2025, NABU announced the detention of five individuals and the service of notices of suspicion on seven suspects, including Tymur Mindich, who is widely regarded as one of President Volodymyr Zelenskyy's closest business associates and long-standing acquaintances.



Frame from a NABU video about Operation "Midas". The image shows a suspect in the case identified by the pseudonym "Che Guevara", whom NABU identified as Oleksii Chernyshov, former Deputy Prime Minister, 11 November 2025.

Screenshot from the NABU YouTube channel

On 14 November 2025, Ukrainska Pravda published a study by the People with Cardboards movement[70], which pointed to the existence of a coordinated media campaign aimed at discrediting NABU.

NABU also confirmed that one of the detectives accused of high treason – Ruslan Mahamedrasulov – had been involved in documenting the suspects in the corruption scheme uncovered during Operation "Midas" (this information had not previously been officially confirmed)[71].

During Operation "Midas", detectives discovered evidence at a safe house used by the suspects indicating unlawful intelligence-gathering and surveillance of NABU personnel. In particular, they seized detailed dossiers on Semen Kryvonos, Director of NABU, Denys Hiulmahomedov, First Deputy Director of NABU, and Oleksandr Abakumov, Head of the Detective Unit. The files contained personal data, photographs obtained from CCTV cameras, and records of their movements. The nature of the materials recovered, including information obtained from restricted databases, suggests that the suspects in the criminal proceedings had access to the resources of other law enforcement agencies to conduct

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67 "Olena Shcherban, Lawyer for Activist Vitaliy Shabunin, Reports Pressure and Attempt to Revoke Her Licence to Practise Law", ZMINA, 14 August 2025: https://zmina.info/news/advokatka-aktyvista-vitaliya-shabunina-olena-shherban-zayavyla-pro-tysk-i-sprobu-pozbavyty-yiyi-advokatskoyi-liczenziyi/

68 Operation "Midas" is a large-scale anti-corruption investigation conducted by the National Anti-Corruption Bureau of Ukraine (NABU) and the Specialised Anti-Corruption Prosecutor's Office (SAPO) into alleged high-level corruption in Ukraine's energy sector, primarily concerning the activities of the Joint Stock Company "National Nuclear Energy Generating Company Energoatom" (JSC NNEGC Energoatom).

69 "Operation "Midas": High-Level Criminal Organisation Operating in the Energy Sector Exposed", NABU, 10 November 2025: https://nabu.gov.ua/news/operatciia-midas-vykryto-vysokorivnevu-zlochynnu-organizatciiu-shcho-diiala-u-sferi-energetyky/

70 "The Media War Against NABU and SAPO: How Leading Telegram Channels Are Trying to Destroy the Reputation of Ukraine's Anti-Corruption Institutions", Ukrainska Pravda, 14 November 2025: https://www.pravda.com.ua/articles/2025/11/14/8007228/

71 "NABU Officially Confirms: Mahamedrasulov, NABU Detective, Was Collecting Evidence on Mindich and Other Suspects as Part of Operation "Midas" (Document)", Anti-Corruption Action Centre, 12 November 2025: https://antac.org.ua/news/nabu-shche-raz-pidtverdylo-mahamedrasulov-zdiysniuvav-dokumentuvannia-mindicha-ta-inshykh-fihurantiv-v-operatsii-midas-dokument/

countersurveillance against employees of the anti-corruption institution[72]. In addition, investigators established that information about the planned operation had been leaked, enabling key suspects to leave the country and attempt to destroy evidence immediately before the searches began.

On 25 November, during a meeting of the Verkhovna Rada Committee on Anti-Corruption Policy, Oleksandr Abakumov, Head of a NABU detective unit, stated that investigators had discovered a total of 527 records in the back office used by members of the criminal organisation, containing information extracted from restricted databases, including residential addresses, passport details, telephone numbers, and information about relatives[73]. Bureau staff identified profiles relating to, among others, 15 NABU detectives currently investigating cases involving the energy sector and law enforcement agencies; 16 Members of Parliament, including Committee Chair Anastasiia Radina and Chair of the TIC on Economic Security[74] Yaroslav Zhelezniak; 18 ministers and deputy ministers, primarily from the energy and justice sectors; nine SSU officers; ten journalists, including Yurii Nikolov and Oleksii Shalaiskyi; and the former head of Ukrenergo. Abakumov also noted that some of the files relating to Bureau employees had been compiled on 17 July, five days before the coordinated actions against NABU and SAPO. Among them were records concerning NABU employees Yevhen Tokar, Ruslan Mahamedrasulov, and Vitalii Tiebiekin, all of whom were later served with notices of suspicion.

On 10 December 2025, a meeting of the TIC on Economic Security considered evidence suggesting that suspects in the “Midas” case may have used the resources of the SBI, the OPG, and the SSU to obstruct NABU’s activities. Members of Parliament drew attention to audio recordings in which one of the suspects claimed to be coordinating actions with “Riznytska”, “the Service”, and “the Station” to fabricate criminal cases against opponents. As Anastasiia Radina noted, the term “the Station” was used in NABU’s recordings as a code word referring to the SBI. Representatives of the SBI, however, did not provide comprehensive information regarding the suspect’s visits to the agency. The meeting also addressed the possible role of senior prosecutors in facilitating the activities of the criminal organisation. Representatives of the OPG responded that launching internal investigations into such allegations in the absence of a formal notice of suspicion could itself be regarded as undue pressure. In this context, Yaroslav Zhelezniak, Chair of the TIC, Member of Parliament, stressed the need for a separate investigation into possible political influence over law enforcement agencies and the alleged fabrication of criminal proceedings against NABU and SAPO[75].

Although pressure on the anti-corruption sector through criminal proceedings became less intense in December 2025, and Ruslan Mahamedrasulov, his father, and Viktor Husarov were released from the Kyiv SIZO (as discussed in more detail in Chapter 1), other methods of pressure and discreditation continued to be used against anti-corruption actors.

For example, on 16 December 2025, private intimate photographs of Vitaliy Shabunin, Chair of AntAC, were published on a number of anonymous Telegram channels. According to Shabunin, the images had been extracted from a mobile phone seized during the July 2025 searches and had remained in the possession of law enforcement authorities ever since[76]. The publication of private intimate images obtained in the course of criminal proceedings constituted another example of information and reputational pressure aimed at discrediting an anti-corruption activist through interference with his private life.

Personnel decisions affecting the institutional safeguards for the independence of the anti-corruption bodies also became a source of concern. On 23 December 2025, by order of the Prosecutor General, lawyer Oleksii Shevchuk was appointed as a member of the selection commission responsible

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72 “NABU and SAPO Report to Parliament: First Findings of Operation ‘Midas’”, broadcast of the meeting of the Verkhovna Rada Committee on Anti-Corruption Policy, Zaliznyi Nardep YouTube channel, 24 November 2025: https://www.youtube.com/live/HhN1T-4wdBs

73 Transcript of the Meeting of the Verkhovna Rada Committee on Anti-Corruption Policy of 25 November 2025: https://crimecor.rada.gov.ua/uploads/documents/33610.pdf

74 Resolution of the Verkhovna Rada of Ukraine “On the Establishment of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine to Investigate Possible Unlawful Actions by Officials of State Authorities, Other State Bodies, and State-Owned Economic Entities That May Have Harmed Ukraine’s Economic Security”: https://zakon.rada.gov.ua/laws/show/4850-20#Text

75 “Investigative Commission Discusses New Details of the “Midas” Energy Corruption Case”, Suspilne News YouTube channel, 10 December 2025: https://www.youtube.com/watch?v=9-CMDk5y9h8

76 “The SBI and the OPG Leaked My Intimate Photos from the Phone Seized During the Search to Telegram Channels”, Vitaliy Shabunin Facebook page, 16 December 2025: https://www.facebook.com/share/17xoUP46g7/

for choosing the leadership of SAPO[77]. Expert organisations pointed out that Shevchuk did not meet the statutory requirements for commission members, which include an impeccable professional reputation, high moral character, public authority, and proven experience in the fields of justice or anti-corruption. They also noted that the Ethics Council had previously officially found him not to satisfy the integrity criteria required for appointment as a judge[78]. On 27 January 2026, more than sixty civil society organisations, media outlets, and public figures issued a joint statement calling on the Prosecutor General to revoke Shevchuk's appointment and bring the composition of the selection commission into compliance with the law. The signatories stressed that the participation of an individual with a questionable reputation in the body responsible for selecting SAPO's leadership undermined confidence in the competitive selection process, created risks of political influence over the anti-corruption prosecution service, and could have long-term consequences for the effectiveness of Ukraine's entire anti-corruption infrastructure[79].

New incidents indicating possible coercive pressure on NABU personnel were also documented. On 10 February 2026, NABU reported that specialised covert surveillance equipment had been discovered in the home of the head of a detective unit investigating corruption in the defence sector and involved in Operation "Midas". According to preliminary information, the equipment had been installed by officers of one of Ukraine's law enforcement agencies without judicial authorisation[80]. According to the Bureau, the unit was responsible for investigating cases concerning abuses in the procurement of unmanned aerial vehicles, as well as other sensitive defence-related cases, heightening concerns that the resources of the state security and law enforcement apparatus might be used to conduct surveillance of NABU detectives. On 26 February 2026, during a meeting of the Verkhovna Rada Committee on Anti-Corruption Policy, Semen Kryvonos, Director of NABU, Oleksandr Klymenko, Head of SAPO, and Oleksandr Abakumov, Head of NABU's First Main Detective Unit, briefed Members of Parliament in detail on the incident[81]. Abakumov publicly confirmed that the covert surveillance operation had targeted the head of the detective unit involved in Operation "Midas" and investigations into defence procurement. He stated that NABU had identified the law enforcement agency it believed was responsible for installing the equipment and also pointed to other possible forms of surveillance targeting detectives, including the use of video surveillance systems and the monitoring of official vehicles.

In January 2026, Yaroslav Zhelezniak, Member of Parliament, published an investigation identifying, on the basis of information provided by his sources, the alleged owners of five of the largest anonymous Telegram channels ("INSIDER UA", "Ukraina Seichas", "Realna viina", "Ukraina Online)", and "Times of Ukraine"). According to the investigation, these channels had systematically published discreditation materials targeting NABU and SAPO while generating substantial undeclared income from political advertising that was not reported in tax filings[82]. In a follow-up investigation published in February 2026, Zhelezniak reported that some of the alleged owners of these channels had been exempted from mobilisation as reserve members of the SSU. Citing sources within law enforcement agencies and the Office of the President, he further suggested that the Department for the Protection of National Statehood of the SSU may have overseen work involving anonymous Telegram channels. The Department had previously been linked to the surveillance of journalists from Bihus.Info and to information campaigns targeting NABU and SAPO[83].

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77 "Oleksii Shevchuk Appointed to the Selection Commission for the Leadership of the Specialised Anti-Corruption Prosecutor's Office", Ukrainian National Bar Association, 22 January 2026: https://unba.org.ua/news/11256-oleksiya-shevchuka-priznacheno-do-skladu-konkursnoi-komisii-z-vidboru-kerivnictva-sap.html

78 "The Ethics Council Adopts a Decision on Candidates for Appointment by the President of Ukraine to the High Council of Justice", Judiciary of Ukraine, 16 March 2023: https://ec.court.gov.ua/ec/pres-centr/general/1396316/

79 "Joint Statement by Civil Society Organisations, Media Outlets, and Public Figures Calling on the Prosecutor General to Revoke the Appointment of Oleksii Shevchuk to the SAPO Selection Commission", Human Rights Centre ZMINA, 27 January 2026: https://zmina.ua/statements/gromadski-organizacziyi-zaklykayut-genprokurora-skasuvaty-pryznachennya-oleksiya-shevchuka-do-konkursnoyi-komisiyi-sap/

80 "NABU Uncovers Attempt to Plant a Listening Device in the Home of the Head of the Detective Unit Investigating Corruption in the Defence Sector and Involved in Operation "Midas"", NABU Facebook page, 10 February 2026: https://www.facebook.com/nabu.gov.ua/posts/pfbid036QrkPX7rM1L14cS4nbdEdDWYfuYefYC72eNm2xETin8XbiQfvJq64z6hy3QpZT4El

81 "Meeting of the Verkhovna Rada Committee on Anti-Corruption Policy of 26 February 2026", Verkhovna Rada Committee on Anti-Corruption Policy YouTube channel, 26 February 2026: https://www.youtube.com/watch?v=cik0U8flSXc

82 "The Owners of Anonymous Telegram Channels Have Been Identified: The Top Five Linked to Bankova. Million-Dollar Businesses, Zero Taxes", Zaliznyi Nardep YouTube channel, 21 January 2026: https://www.youtube.com/watch?v=mLEWix3aKuw

83 "The SSU Is Shielding the Owners of Telegram Channels. We Have Official Confirmation of the Names of the Special Agents. Who Is Behind It?", Zaliznyi Nardep YouTube channel, 22 February 2026: https://www.youtube.com/watch?v=p9S5orU19ck

On 10 March 2026, during a meeting of the Verkhovna Rada's Temporary Investigative Commission on anonymous Telegram channels, Marharyta Zhyvaha, Head of Communications at NABU, reported that during February 2026 alone the Bureau had recorded more than 300 publications or information attacks targeting NABU and SAPO. Anonymous Telegram channels were identified as the principal means of dissemination, while the content of the publications bore the hallmarks of coordinated campaigns responding to active investigative measures in high-profile cases[84].

On 15 March 2026, during a NABU operation in the Sumy region, SSU officers detained a Bureau detective at a checkpoint while he was carrying out official duties as part of a criminal investigation, citing the fact that he had relatives living in the TOT[85]. According to the SSU, the grounds for the detention included the detective's origin from a temporarily occupied territory, his failure to clearly identify his place of employment during the document check, and the presence of Russian telephone numbers in his mobile phone, which the agency stated was consistent with standard security protocols at checkpoints in frontline regions[86]. NABU, however, emphasised that the detective had been in Sumy as part of an official investigation and had successfully undergone all required vetting procedures before joining the Bureau. According to Oleksandr Klymenko, Head of SAPO, the detention disrupted the operational plan, alerted some of the suspects in advance to the planned investigative measures, and likely resulted in an information leak from one of the law enforcement agencies, which NABU regarded as interference with its investigation[87].

Later that same month, in March 2026, Semen Kryvonos, Director of NABU, became the target of another large-scale information attack. A number of online media outlets and anonymous Telegram channels, particularly following a widely publicised interview conducted by former Member of Parliament Boryslav Bereza with Svitlana Panchenko[88], published allegations that Kryvonos had previously engaged in a fictitious adoption and had manipulated his asset declarations, presenting these allegations as "evidence of corruption" on the part of the Bureau's Director[89]. Against the backdrop of this wave of publications, several former officials, including former SAPO prosecutor Stanislav Bronevytskyi, publicly called on Kryvonos to resign, relying specifically on the published allegations concerning the alleged "fictitious parenthood" and inaccurate asset declarations. These narratives were actively amplified by the same anonymous Telegram channels that had previously targeted AntAC, Bihus.Info, and other anti-corruption actors. They also formed part of broader discreditation campaigns against NABU and its leadership, supporting the assessment that the attack on Kryvonos was part of a systematic media strategy directed against Ukraine's independent anti-corruption institutions[90].

On 30 March 2026, an organised protest took place outside NABU headquarters involving two men carrying video cameras who attempted to provoke Bureau employees by repeating allegations concerning the Director's alleged "fictitious adoption" of a child[91]. Later, Yaroslav Zhelezniak, Member of Parliament, citing findings from his own investigation, stated that the identified participants in the protest had links to the sporting community and had previously taken part in similar actions. In particular, one of them had been observed attending court hearings in the cases involving AntAC Chair Vitaliy Shabunin and former Ukrenergo CEO Volodymyr Kudrytskyi. He further suggested that they might also be connected to the

84 "Who Is Behind Bankova's Blogs? Fake Exemptions and Zero Taxes. The SSU, Cyber Police, and ESBU Summoned to Parliament", Zaliznyi Nardep YouTube channel, 10 March 2026: https://www.youtube.com/live/I7NlcFYmsZs

85 "A NABU Officer Has Just Been Unlawfully Detained at a Checkpoint Near the Entrance to Sumy by SSU Officers Believed to Belong to a Unit Coordinated by the First Deputy Head of the SSU", NABU Facebook page, 15 March 2026: https://www.facebook.com/nabu.gov.ua/posts/pfbid0ExM9RB4xjwVLXDcRFvHMjdvB1UQCNBCXNhcakDBzaVaJexJjC5Y16Mi1QJHAEYYnl

86 "Statement by the SSU Press Service", SSU Facebook page, 15 March 2026: https://www.facebook.com/SecurSerUkraine/posts/pfbid0248ppvBph4KsoH6qa7CEaZiNio3CfvHEgm2tFAKw4qxNpAtHTPuxMkTJ19o7B3bq1l

87 "Oleksandr Klymenko, Head of SAPO, on SSU Pressure on SAPO, Mindich's Extradition, and Yermak's Role", interview, DW Ukrainian YouTube channel, 3 April 2026: https://www.youtube.com/watch?v=9pCCneLngG0

88 "They Found a Son of Semen Kryvonos, Director of NABU. To Avoid Going to Prison, He…", Boryslav Bereza YouTube channel, 12 March 2026: https://www.youtube.com/watch?v=ef3k_UBwh7I

89 "Fictitious Paternity and Asset Declarations: Media Publish Allegations Against Semen Kryvonos, Director of NABU", Judicial and Legal Newspaper, 15 March 2026: https://sud.ua/uk/news/publication/355909-fiktivnoe-ottsovstvo-i-deklaratsii-v-smi-poyavilis-obvineniya-v-adres-direktora-nabu-semena-krivonosa

90 "Disinformation Campaign Against Semen Kryvonos: Who Benefits from Discrediting the Director of NABU?", ZMINA, 22 March 2026: https://zmina.info/articles/informaczijni-vkydy-proty-kryvonosa-hto-zaczikavlenyj-u-dyskredytacziyi-kerivnyka-nabu/

91 "Participants Identified After the Provocation Outside NABU: MP Yaroslav Zhelezniak Says It Was an Attempt to Influence the Agency", ZMINA, 6 April 2026: https://zmina.info/news/pislya-provokacziyi-pid-nabu-identyfikuvaly-uchasnykiv-nardep-zheleznyak-govoryt-pro-sprobu-vplyvu-na-ustanovu/

network of anonymous Telegram channels that simultaneously disseminated videos from the protest and had previously conducted coordinated campaigns targeting NABU and SAPO[92].

On 28 April 2026, Mykhailo Tkach, investigative journalist of Ukrainska Pravda, published a new set of recordings known as the "Mindich tapes"[93]. According to the investigation, the recordings indicate that, after NABU and SAPO served a notice of suspicion on Deputy Prime Minister Oleksii Chernyshov in June 2025, individuals from President Volodymyr Zelenskyy's inner circle discussed possible ways of influencing the law enforcement system. In particular, the investigation alleges that those involved complained that NABU was acting *"too aggressively"* and discussed the role of Oleh Tatarov, Deputy Head of the Office of the President, as someone capable of influencing law enforcement agencies.

On 5 May 2026, Yaroslav Zhelezniak, Member of Parliament, published the first instalment of his own series based on recordings linked to Tymur Mindich, focusing on the attitudes of those involved towards the anti-corruption institutions[94]. According to the published conversations, the participants believed that it was possible to *"reach an understanding"* with some law enforcement agencies, whereas NABU remained the only institution they neither controlled nor could *"reach an understanding"* with. In one of the recordings, according to Zhelezniak, after noticing external surveillance, the participants discussed the risks posed by video surveillance and the possibility of lobbying for some law enforcement officers to be sent to the front. The idea of sending NABU employees to the front was also raised. In Zhelezniak's assessment, the recordings indicate both that the participants were aware of NABU's investigation while continuing their alleged unlawful activities and that employees of other law enforcement agencies may have been involved in leaking information about the surveillance. He further argued that the attempt to dismantle NABU and SAPO in July 2025 took place only after these events and had a clear motivation.

At the same time, pressure shifted towards obstructing procedural work in the "Midas" case. On 12 May 2026, following the service of a notice of suspicion on former Head of the Office of the President Andrii Yermak in a money laundering case[95], Semen Kryvonos, Director of NABU, and Oleksandr Klymenko, Head of SAPO stated during a press briefing that experts involved in the investigation had come under pressure[96].

Andrii Yermak (right) and his lawyer Ihor Fomin in the courtroom of the High Anti-Corruption Court, Kyiv, 21 May 2026.

Photo credit: Denys Bulavin for Hromadske

According to Kryvonos and Klymenko, unidentified individuals had contacted experts, conveyed "signals" urging them to exercise caution, and threatened consequences for them and their family members. As a result, some experts refused to conduct forensic examinations in cases involving high-level corruption. Kryvonos stated that NABU had already documented possible pressure on experts in at least one case, allegedly involving certain SSU officers, and that a separate criminal investigation had been opened into the matter. Klymenko stressed the need to establish an independent forensic institution with statutory guarantees protecting experts from political and other forms of extraprocedural pressure, underscoring the systemic rather than isolated nature of the problem.

92 "Petrov Brought a Wild Boar into the NABU Office. They Started Filming. SSU-Linked Telegram Channels Amplified the Provocation", Zaliznyi Nardep YouTube channel, 6 April 2026: https://www.youtube.com/watch?v=qET1hOO60d8

93 "Did the President Know? Previously Unknown Details of Operation "Midas" | UP Investigation", Ukrainska Pravda YouTube channel, 28 April 2026: https://www.youtube.com/watch?v=neYVUCDg100

94 "The Mindich Tapes. It Became Inconvenient to Transport Cash. "The Surgeon" Went Quiet. "The Acrobat" Grew Nervous. The SSU Was Leaking NABU Information", Zaliznyi Nardep YouTube channel, 5 May 2026: https://www.youtube.com/watch?v=VrAn-hK9cB8

95 "Andrii Yermak Served with a Notice of Suspicion in a Corruption Case: What Is Known About 'Dynasty'", BBC News Ukrainian, 11 May 2026: https://www.bbc.com/ukrainian/articles/cg7p5rg0k8ko

96 "Briefing by the Heads of NABU and SAPO", NABU YouTube channel, 12 May 2026: https://www.youtube.com/live/kCnZfmyaQWc

Taken together, these episodes point to the emergence of a persistent pattern of institutional, procedural, and informational pressure on state anti-corruption bodies and the wider anti-corruption civil society sector, which has persisted beyond the “reformist” phase of the post-Maidan period. The use of constitutional mechanisms, personnel decisions, manipulation of selection procedures, criminal proceedings against detectives and anti-corruption activists, and coordinated discreditation campaigns has created a broader context in which the criminal prosecution of anti-corruption actors in 2025–2026 appears as a new phase in the continuation of earlier trends.

Search at the home of a NABU employee, 21 July 2025.
Photo credit: Ukrainska Pravda

CHAPTER 1.

OVERVIEW OF DOCUMENTED CASES INDICATING PRESSURE ON ANTI-CORRUPTION ACTORS

This chapter presents documented cases of procedural and informational pressure on anti-corruption actors and persons associated with them during the period from the first search conducted on 11 July 2025 to 31 May 2026. The material presented in this chapter serves as the empirical basis for the comparative and legal analysis undertaken in the subsequent parts of this study. It does not assess the guilt or innocence of any individual, nor does it prejudge the outcome of the proceedings on the merits.

The chapter is organised thematically. It begins with proceedings relating to national security, followed by other categories of cases, including those concerning false asset declarations, illicit enrichment, and road traffic accidents. In a number of cases, notices of suspicion were served; these are discussed in the relevant thematic sections.

THE CASE OF VITALIY SHABUNIN

Vitaliy Shabunin is the Chair of AntAC and one of Ukraine's leading anti-corruption activists. Since 25 February 2022, he has served voluntarily in the AFU while continuing his civic anti-corruption work. Since the establishment of AntAC, Shabunin and the organisation's team have repeatedly reported being subjected to persecution in connection with their anti-corruption activities[97].

A new episode occurred on 11 July 2025, when SBI officers carried out searches at his place of military service in the Kharkiv region and at his family home in Kyiv. According to AntAC, the searches were conducted without judicial authorisation and in the absence of defence lawyers. The organisation further stated that the searches had been organised in such a way as to prevent defence lawyers from arriving in time and that, when the lawyers attempted to document the searches, SBI investigators threatened to seize their mobile phones. During the searches, investigators seized mobile phones belonging to Vitaliy Shabunin and his wife, as well as a mobile phone and tablet used by their minor children[98]. These procedural measures took place the day after Shabunin had been transferred to a new military unit. On the same day, the SBI served him with a notice of suspicion for evading military service[99] and large-scale fraud[100].

Also on 11 July, as part of the investigation into Shabunin's case, the SBI searched the Kharkiv apartment of Liliia Averianova, the mother of the late pilot Andrii Pilshchykov ("Juice"). Shabunin had known Pilshchykov personally and had supported his mother following his death. The apartment was occasionally used by friends travelling to Kharkiv for work, including Shabunin, who sometimes stayed there overnight. Averianova said that investigators had telephoned her in advance, informing her that they intended to force entry because they were *"looking for a criminal"* and asking her to come to the apartment. At the time, she was in Kyiv and, according to her account, *"barely managed to stop them"* in order to prevent damage to the property. The apartment was ultimately opened by a neighbour who had a set of keys. Averianova later stated that she had been admitted to hospital because of stress[101]. Daria Kaleniuk, AntAC Executive Director, noted that the search had been carried out without judicial authorisation[102].

An SBI officer serves Vitaliy Shabunin with a notice of suspicion, 11 July 2025. Photo credit: State Bureau of Investigation

According to the SBI's press release, following his mobilisation in 2022, Shabunin was absent from his place of military service for an extended period and, while purportedly on official assignments, was allegedly staying at civilian institutions outside the AFU. The press release further alleged that he continued to receive monthly military remuneration exceeding UAH 50,000 despite his actual absence from his military unit. It also claimed that he had unlawfully used a sport utility vehicle for personal

97 See, in particular: "Attacks on AntAC", Anti-Corruption Action Centre (AntAC): https://surl.li/jsaoxw

98 "The Notice of Suspicion and Searches Targeting Vitaliy Shabunin Constitute Arbitrariness and Political Retribution", Ukrainska Pravda, 12 July 2025: https://www.pravda.com.ua/columns/2025/07/12/7521411/

99 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 409(4): https://zakon.rada.gov.ua/laws/show/2341-14#Text

100 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 190(2): https://zakon.rada.gov.ua/laws/show/2341-14#Text

101 "SBI Investigators Search the Apartment of the Mother of Fallen Pilot "Juice" in the Case Against Vitaliy Shabunin, Chair of AntAC", Suspilne News, 16 July 2025: https://suspilne.media/1068029-u-kvartiri-zagiblogo-pilota-dzusa-slidci-dbr-proveli-obsuki/

102 "The SBI Raided Juice's Mother's Apartment Without a Court Order – They Were Looking for "Criminal" Shabunin", Daria Kaleniuk Facebook page, 16 July 2025: https://www.facebook.com/dkaleniuk/posts/10163499394599188

purposes, including travelling around Kyiv. According to the SBI, the vehicle had been imported into Ukraine as humanitarian aid for the Armed Forces but had been used without the required legal formalities or legal grounds[103].

AntAC rejected these allegations. The organisation stated that Shabunin had been seconded to the NACP from September 2022 to February 2023 while his Territorial Defence unit was stationed in the Kyiv region and had acted lawfully in compliance with a military order. With regard to the fraud allegation, AntAC stressed that Shabunin had received only the standard salary payable to military personnel. He had not received any combat-related payments, while part of the amount allegedly "misappropriated" corresponded to mandatory unified social security contributions paid on his behalf. AntAC further noted that the sport utility vehicle referred to in the SBI's press release, which had been purchased for Shabunin by a charitable foundation, was not mentioned in the notice of suspicion served on him[104]. The organisation considers the case to be politically motivated, while Vitaliy Shabunin, Chair of AntAC, described it as *"one of the first confident steps towards corrupt authoritarianism"*[105].

In July 2025, more than 100 Ukrainian civil society organisations, including ZMINA, issued a joint statement condemning the criminal prosecution and calling for an end to the use of the justice system as a tool for political retaliation[106]. The statement argued that the law did not require Shabunin to take any specific action in connection with his secondment; his duty was simply to comply with the order assigning him to that secondment. Regarding his military remuneration, the organisations stated that "*its payment neither depended on his will nor was calculated by him. These matters are regulated by the state, and if the state considers that an unjustified payment has been made, civil law provides a mechanism for seeking repayment of those funds. Accordingly, Vitaliy Shabunin is suspected of actions that were carried out by state authorities, since a serviceman does not determine the amount of remuneration to be paid or the authority responsible for calculating it. He is a subordinate who, while serving, remains in the 'hands' of the state and is dependent on it*"[107], the organisations said.

A number of Ukrainian media outlets also issued statements condemning the authorities' pressure on Vitaliy Shabunin, including Ukrainska Pravda[108], Mirror of the week (ZN.UA)[109], Censor.NET[110], and The Kyiv Independent[111]. On 3 November, the World Organisation Against Torture (OMCT) and the International Federation for Human Rights issued a joint statement calling for the immediate end to all forms of persecution, including the politically motivated judicial persecution of Vitaliy Shabunin, an anti-corruption activist and serviceman[112].

According to a study by Detector Media, the service of a notice of suspicion on Vitaliy Shabunin was followed by an intensified information campaign in the Ukrainian media space that bore the hallmarks of coordination. The campaign included discrediting narratives and criticism of Shabunin,

103 "The State Bureau of Investigation Serves a Notice of Suspicion on a Civil Society Activist for Military Service Evasion and Fraud (Video)", State Bureau of Investigation, 11 July 2025: https://dbr.gov.ua/news/dbr-povidomilo-pro-pidozru-odnomu-iz-gromadskih-aktivistiv-za-uhilennya-vid-vijskovoi-sluzhbi-ta-shahrajstvo

104 "The Notice of Suspicion and Searches Targeting Vitaliy Shabunin Constitute Arbitrariness and Political Retribution", Ukrainska Pravda, 12 July 2025: https://www.pravda.com.ua/columns/2025/07/12/7521411/

105 "Discreditation, Searches Without a Court Order, Pressure on the Family – Details of the Criminal Prosecution of Vitaliy Shabunin by Zelenskyy's Office", Anti-Corruption Action Centre, 14 July 2025: https://surl.li/qusyvp

106 "Stop Using the Justice System for Political Retribution: Statement by Civil Society Organisations on the Case of Vitaliy Shabunin", ZMINA, 15 July 2025: https://zmina.ua/statements/prypynyty-vykorystovuvaty-systemu-pravosuddya-dlya-politychnyh-rozprav-zayava-gromadskyh-organizaczij-shhodo-spravy-vitaliya-shabunina/

107 Ibid.

108 "Selective Justice and Silent Approval – A Path to Authoritarianism", Ukrainska Pravda, 12 July 2025: https://www.pravda.com.ua/articles/2025/07/12/7521436/

109 "Statement by the Editorial Board of ZN.UA on the Authorities' Pressure on Vitaliy Shabunin, Chair of AntAC", ZN.UA, 12 July 2025: https://zn.ua/ukr/anticorruption/zajava-redaktsiji-znua-shchodo-tisku-vladi-na-holovu-tspk-vitalija-shabunina.html

110 "Statement by the Editorial Board of Censor.NET on the Authorities' Pressure on Vitaliy Shabunin, Chair of the Anti-Corruption Action Centre", Censor.NET, 12 July 2025: https://censor.net/ua/n3562942

111 Editorial: Right now, Ukraine's democracy risks a Russian-style backslide / Kyiv Independent, 14 July 2025: https://kyivindependent.com/editorial-right-now-ukraines-democracy-risks-a-russian-style-backslide/

112 Ukraine: Judicial harassment of anti-corruption activist Vitaliy Shabunin / OMCT, 3 November 2025: https://www.omct.org/en/resources/urgent-interventions/ukraine-judicial-harassment-of-anti-corruption-activist-mr-vitaliy-shabunin

combined factual information with value judgments, and disseminated allegations before the anti-corruption activist and serviceman had been found guilty by a court[113].

On 15 July 2025, the Pecherskyi District Court of Kyiv imposed a preventive measure on Vitaliy Shabunin in the form of a personal recognisance, effective until 20 August 2025. Under the decision of investigating judge Svitlana Hrechana, he was required, among other obligations, to appear when summoned by an investigator, prosecutor, or the court; not to leave his place of military service; not to enter the premises of the NACP; and not to communicate with witnesses or his former battalion commander, Viktor Yushko.

In March 2025, his former battalion commander, Viktor Yushko, was served with a notice of suspicion for abuse of office in connection with issuing secondment orders between October 2022 and February 2023. According to Yushko's lawyers, after he refused to testify against Vitaliy Shabunin, the prosecutor sought the application of a preventive measure in the form of bail in a substantial amount, which, in their view, was unusual for this category of non-serious offences[114]. During the hearing on the preventive measure, the parties presented their respective positions: the prosecutor requested that bail be set at UAH 224,000, whereas the defence argued that, in this case, it should range from approximately UAH 3,000 to UAH 60,000. Ultimately, the Pecherskyi District Court of Kyiv set Yushko's bail at UAH 60,560[115].

Vitaliy Shabunin during the hearing on the application of a preventive measure at the Pecherskyi District Court of Kyiv, 15 July 2025. Standing next to him is Serhii Rokun, his lawyer. The decision is being delivered by investigating judge Svitlana Hrechana.

Photo credit: Oleksii Arunian for Suspilne News

AntAC stated that, during the two-year investigation, the SBI had neither questioned the leadership of the NACP regarding Vitaliy Shabunin's secondment nor questioned Shabunin himself before serving him with a notice of suspicion[116]. During the hearing on the application of a preventive measure, Shabunin declined to testify, invoking his right against self-incrimination[117].

On 14 August 2025, the SBI announced the completion of the investigation into Shabunin's case. The Bureau stated that, following its examination of the circumstances surrounding the use of a vehicle intended for the AFU, it had found no grounds for serving a notice of suspicion in relation to that aspect of the case. It also reported that the electronic devices seized during the search of the serviceman's residence had been returned[118]. Shabunin, however, stated that the devices returned belonged to his family members, whereas his own mobile phone and laptop had not been returned. He further noted that the SBI had published its press release while procedural actions were still ongoing, leaving him with no opportunity to respond to its claims[119].

113 "Media Coverage of the Shabunin Case Shows Signs of a Coordinated Information Campaign", Detector Media, 18 July 2025: https://surl.li/xlrjkh

114 "The Uniminds Team Is Defending the Commander of Kyiv's 207th Territorial Defence Battalion in an Abuse of Office Case", Uniminds – A New Generation Law Firm Facebook page, 7 March 2025: https://www.facebook.com/share/p/1CD4H927Va/

115 "Viktor Yushko, Former Commander of Kyiv's Territorial Defence Battalion, Placed Under a Preventive Measure", Suspilne News, 11 March 2025: https://suspilne.media/kyiv/967697-sud-obrav-zapobiznij-zahid-kolisnomu-komandiru-bataljonu-tro-kieva-viktoru-usku/

116 "It's Not That We're Particularly Surprised. After All, This Is the Infamous Pecherskyi Court", Anti-Corruption Action Centre Facebook page, 15 July 2025: https://www.facebook.com/antac.ua/posts/1141614644436555

117 ""If I Had Wanted to Avoid Serving, I Could Easily Have Done So": How the Court Chose a Preventive Measure for Vitaliy Shabunin", Suspilne News, 16 July 2025: https://suspilne.media/1068223-akbi-a-ne-hotiv-sluziti-a-b-legko-ce-zrobiv-ak-vitaliu-sabuninu-obirali-zapobiznij-zahid/

118 "The State Bureau of Investigation Completes Investigation into a Serviceman for Military Service Evasion", State Bureau of Investigation, 14 August 2025: https://dbr.gov.ua/news/dbr-zavershilo-rozsliduvannya-shhodo-vijskovogo-za-uhilennya-vid-vijskovoi-sluzhbi

119 "The SBI Misled Journalists Again – This Time by Claiming They Had Returned My Seized Devices (Which Became the Headlines)", Vitaliy Shabunin Facebook page, 15 August 2025: https://www.facebook.com/share/p/1fmB8rWrQf/

The Pecherskyi District Court of Kyiv twice extended the preventive measure in the form of a personal recognisance – first until 19 October[120], and subsequently until 2 November 2025 – while maintaining the procedural obligations previously imposed[121]. The preventive measure was not extended thereafter. Although prosecutors filed a motion on 5 November seeking its further extension, the motion was never considered by the court.

Screenshots from video footage of the search of Vitaliy Shabunin conducted on 11 July 2025 at his place of military service in the Chuhuiv district of the Kharkiv region. The footage captures the moment when one of the law enforcement officers carries Shabunin's mobile phone into the room where the investigative measure is taking place.

The video was published as part of a Slidstvo.Info investigation on 19 November 2025

On 16 December 2025, Vitaliy Shabunin stated that officials from the SBI and the OPG had used Telegram channels to disseminate private photographs extracted from the mobile phone seized during the July search[122]. Shabunin linked the leak to the publication of an AntAC article identifying individuals whom the organisation considers responsible for undermining the independence of NABU and SAPO, including representatives of the OPG, the SBI, the SSU, and judges who had authorised searches and the pre-trial detention of NABU detectives.[123].

An investigation by Slidstvo.Info, based on video footage of the search conducted in the Kharkiv region, also addressed Vitaliy Shabunin's mobile phone. According to Shabunin, an SSU officer snatched the phone from his hands before the search began and later attempted to plant it during the search[124].

The crime report concerning the disclosure of the private photographs was registered by the OPG only after a delay of several days[125], despite the requirement under Ukrainian law that pre-trial investigation authorities enter information into the URPI within 24 hours[126]. The report was ultimately registered only after Shabunin's complaint concerning the prosecutors' failure to act had been automatically assigned to investigating judge Tetiana Hurtova for consideration. According to the defence, Shabunin was recognised as a victim and questioned in that capacity within the criminal proceedings. A complaint challenging the refusal to grant the defence access to the pre-trial investigation materials is currently pending before the Pecherskyi District Court of Kyiv. The investigator has refused to provide the materials in full. However, pursuant to a court ruling of 23 April 2026, the investigator was ordered to reconsider the relevant request and inform the applicant of the outcome[127].

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120 Ruling of the Pecherskyi District Court of Kyiv in Case No. 757/39141/25-k / Unified State Register of Court Decisions, 19 August 2025: https://reyestr.court.gov.ua/Review/129888331

121 "Court Extends the Preventive Measure Imposed on Vitaliy Shabunin Until 2 November", Suspilne News, 17 October 2025: https://suspilne.media/1141406-sud-prodovziv-sabuninu-zapobiznij-zahid-do-2-listopada/

122 "The SBI and the OPG Leaked My Intimate Photos from the Phone Seized During the Search to Telegram Channels", Vitaliy Shabunin Facebook page, 16 December 2025: https://www.facebook.com/share/17xoUP46g7/

123 "Who Is Being Used to Destroy NABU and SAPO?", Anti-Corruption Action Centre: https://nabudestroyers.antac.org.ua/

124 "Shabunin's Phone Was Stolen During the Search. The Activist Suspects an SSU Officer (Video)", Slidstvo.Info, 19 November 2025: https://www.slidstvo.info/news/pid-chas-obshuku-u-shabunina-vykraly-telefon-aktyvist-pidozriuie-pratsivnyka-sbu-video/

125 "Shabunin Challenges Kravchenko in Court: The OPG Refused to Register in the Unified Register of Pre-Trial Investigations (URPI) the Alleged Crime Concerning the Leak of His Private Photos by Law Enforcement Officers", Anti-Corruption Action Centre, 24 December 2025: https://antac.org.ua/news/shabunin-podav-do-sudu-skarhu-na-kravchenka-v-henprokuraturi-vidmovylysia-vnosyty-vidomosti-do-yerdr-pro-zlochyn-stosovno-zlyttia-pravookhorontsiamy-yoho-osobystykh-foto/

126 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 214: https://zakon.rada.gov.ua/laws/show/4651-17#Text

127 Ruling of the Pecherskyi District Court of Kyiv in Case No. 757/13535/26-k / Unified State Register of Court Decisions, 23 April 2026: https://reyestr.court.gov.ua/Review/136185953

On 22 December 2025, Vitaliy Shabunin stated on social media that he had been assigned to Kupiansk-Vuzlovyi to install anti-drone nets. According to Shabunin, the task also involved servicemen with health-related restrictions who had been declared fit for limited service by MMC. He stated that one serviceman had lost several fingers, another had a hearing impairment, two others were unable to climb ladders because of combat injuries, and another was unable to fire a weapon due to partial loss of vision. Shabunin further alleged that the command of his military unit had taken potentially unlawful decisions under pressure from the SBI[128].

On 2 January 2026, Vitaliy Shabunin announced that he had filed a crime report against the commander of the 43rd Separate Mechanised Brigade, Colonel Serhii Ryzhov. According to Shabunin, Ryzhov had assisted the SBI and the OPG in persecuting him during his military service. In particular, the SBI conducted the search immediately after Shabunin had been transferred to Ryzhov's brigade, and the commander later obstructed his attendance at court hearings. Shabunin further alleged that Ryzhov had falsely accused him of unauthorised absence from his military unit based on his absence during a single day, despite the fact that he had been attending court pursuant to an official summons. He also stated that Ryzhov subsequently refused his requests for leave on three occasions, preventing him from attending further court hearings[129].

AntAC considers that these actions are intended to deprive Vitaliy Shabunin of the opportunity to attend court hearings and to report publicly on the progress of the proceedings – both those in which he has been served with a notice of suspicion and those in which he has been recognised as a victim[130].

The preparatory hearing in Shabunin's case was adjourned on several occasions. On 18 February 2026, it was held at the Pecherskyi District Court of Kyiv. The defence challenged Oleh Soloviov, the presiding judge, after which the case was referred for a new automated case allocation. The victim is represented in the proceedings by Andrii Pashynskyi, a serviceman of the military unit recognised as the victim in the case[131].

Subsequently, on 17 April 2026, the court refused to refer the criminal proceedings to the Kyiv Court of Appeal for a determination of territorial jurisdiction. The position of Viktor Yushko's defence, supported by Vitaliy Shabunin's legal team, was that jurisdiction should be transferred because the acts attributed to Yushko had allegedly taken place in the Kyiv region – where the secondment order had been signed. The prosecutors argued that the case should remain before the Pecherskyi District Court of Kyiv because, in their view, the alleged offence concerned Shabunin's failure to report to the NACP, which is located in the Pecherskyi district of Kyiv[132]. According to the court ruling, the court concluded that the defence's legal position had not been adequately substantiated or supported by documentary evidence[133].

On 19 May, Vitaliy Shabunin announced that, after more than four years of service in the Defence Forces, he was ending his military service because of an eye condition as a result of which he had "lost most of his eyesight"[134].

On 26 May 2026, the prosecutors filed a motion seeking the imposition of a preventive measure on Vitaliy Shabunin in the form of a personal recognisance, including a prohibition on leaving his place of residence without prior authorisation. During the continuation of the preparatory hearing, and in the motion itself, the prosecution disclosed Shabunin's residential address, which, according to the defence, effectively amounted to a form of house arrest. The prosecutor argued that such a preventive measure

128 "A Soldier Without Fingers Is Being Sent with Me to Kupiansk-Vuzlovyi to Hang Anti-Drone Nets", Vitaliy Shabunin Facebook page, 22 December 2025: https://www.facebook.com/share/p/1Gj4sgMDsx/

129 "Meet My Commander – Serhii Ryzhov, Colonel and Commander of the 43rd Separate Mechanised Brigade", Vitaliy Shabunin Facebook page, 2 January 2026: https://www.facebook.com/share/p/18eveGs6Ps/

130 "Kravchenko's and Sukhachov's "Eagles" Have Done Nothing in Six Months of "Investigating" the Law Enforcement Officers Who Stole Vitaliy Shabunin's Phone, Planted It During the Search, and Then Leaked an Intimate Photo from It", Vitaliy Shabunin Facebook page, 27 January 2026: https://www.facebook.com/share/p/18pmXzYLzW/

131 "Motion to Recuse Judge Soloviov Filed in the Shabunin Case; Materials Referred for a New Automatic Case Assignment", ZMINA, 18 February 2026: https://surl.li/cstavx

132 "Court Refuses to Change Jurisdiction in the Cases of Vitaliy Shabunin and Viktor Yushko – Proceedings to Remain Before the Pecherskyi District Court", ZMINA, 17 April 2026: https://surl.li/iaptuj

133 Ruling of the Pecherskyi District Court of Kyiv in Case No. 757/53663/25-k / Unified State Register of Court Decisions, 17 April 2026: https://reyestr.court.gov.ua/Review/135832006

134 "My Military Service Has Come to an End", Vitaliy Shabunin Facebook page, 19 May 2026: https://www.facebook.com/share/p/18jAjqjG9C/

had become necessary because Shabunin had completed his military service and returned to work at AntAC, alleging that, in the course of his professional activities, he might communicate with witnesses, including employees of the NACP. The prosecution further argued that Shabunin's previous compliance with his procedural obligations had been attributable to his military service rather than to his own willingness to comply. The court adjourned the hearing in order to consider the renewed motion filed by Viktor Yushko's defence concerning territorial jurisdiction and to allow Shabunin's defence time to prepare its position on the requested preventive measure[135].

THE CASE OF RUSLAN MAHAMEDRASULOV

Ruslan Mahamedrasulov, Head of the Fourth Detective Unit of NABU's Fourth Main Detective Unit, oversees the Bureau's south-eastern operational area. The unit is headquartered in Kyiv, maintains offices in Dnipro, and coordinates the Bureau's activities in the frontline Dnipropetrovsk and Zaporizhzhia regions. Mahamedrasulov has served with NABU since 2015 and was among its first intake of detectives. From the first day of Russia's full-scale invasion of Ukraine, he took part in the defence of Kyiv. Beginning on 25 February 2022, he served as part of the Bureau's consolidated unit defending the Office of the President of Ukraine and later participated in documenting war crimes in the Kyiv region – including in Bucha, Moshchun, and Borodianka. From July 2022, he was seconded to the Zaporizhzhia region, where he took part in defence operations as a member of a tactical and operational group of the SSU Counterintelligence Department. In November 2022, he returned to his duties at NABU.

Following the public disclosure of Operation "Midas" by NABU and SAPO in November 2025, it was officially confirmed that Ruslan Mahamedrasulov had gathered key evidence in the case. Oleksandr Abakumov, Head of NABU's First Main Detective Unit, which is conducting the investigation, stated that Mahamedrasulov had been directly involved in the case and had helped secure a number of key pieces of evidence[136]. He also confirmed Mahamedrasulov's involvement in the investigation in an official response by NABU to a lawyer's request[137]. Mahamedrasulov himself stated that he had assisted in documenting the suspects involved in the scheme, including individuals identified in the recordings by the code names "Carlson" and "Sugarman" (Tymur Mindich and Oleksandr Tsukerman). According to him, he was part of the team of detectives and was responsible for carrying out certain investigative measures, including organising the installation of covert audio surveillance equipment[138].

On 21 July 2025, during the mass searches of NABU employees, Ruslan Mahamedrasulov was detained on suspicion of "preparing to aid the aggressor state"[139]. His father, Sentiabr Mahomedrasulov, was detained the same day and served with a notice of suspicion in connection with similar allegations.

In a later interview, Ruslan Mahamedrasulov stated that, on the day of his detention, SSU officers arrived at his home and those of his family members without a court warrant and used force despite the fact that he offered no resistance. According to Mahamedrasulov, the officers immediately forced him to the floor without explanation, struck him on the head and body, and placed him in handcuffs. He further stated that no one explained the nature of the case to him and that he was unable to contact his lawyer, who arrived only towards the end of the search. He also noted that the search record did not contain the criminal proceedings number and that footage showing officers "forcing him to the floor" was circulated through Telegram channels without blurring his face[140].

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135 "In the Shabunin Case, Prosecutors Seek to Bar Him from Leaving His Place of Residence Without Court Permission", ZMINA, 26 May 2026: https://zmina.info/news/u-spravi-shabunina-prokurory-prosyat-zaboronyty-jomu-zalyshaty-miscze-prozhyvannya-bez-dozvolu-sudu/

136 "Mindich Has Fled / Searches of Halushchenko / NABU and SAPO Investigation | UP Chat Special Edition", Ukrainska Pravda YouTube channel, 11 November 2025: https://youtu.be/CecHhStUGsY?t=354

137 "NABU Officially Confirms: Ruslan Mahamedrasulov Conducted Evidence-Gathering on Mindich and Other Suspects in Operation "Midas". Document", Anti-Corruption Action Centre, 12 November 2025: https://surl.li/anpfaq

138 "New Secrets of the Mindich Tapes. Where Is the Notice of Suspicion for Yermak? Envelopes for MPs. Operation "Midas" Continues", Ye Pytannia YouTube channel, 17 December 2025: https://www.youtube.com/watch?v=Qc1bC0vqZ5Q&t=30s;
""Mindich Was the Coordinator, but Not the Scheme's Main Beneficiary" – Blitz Interview with Ruslan Mahamedrasulov, NABU Detective", Suspilne News, 18 November 2025: https://surl.li/krdvzo

139 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 111-2: https://zakon.rada.gov.ua/laws/show/2341-14#Text

140 "From SIZO – About Mindich. The Detective Whose Case Drew Zelenskyy into the NABU and SAPO Scandal Speaks to NV for the First Time About How He Ended Up Behind Bars", NV, 19 August 2025: https://surl.li/puerxx

Footage from the building's surveillance cameras shows approximately 15 armed law enforcement officers entering Ruslan Mahamedrasulov's apartment. According to the NABU official, he was surprised that officers conducting a search of an ordinary apartment arrived with ballistic shields and used strobe lights to disorient those inside as they entered the premises. Mahamedrasulov further stated that he was informed neither of the grounds for the search, nor of his rights, nor of the criminal proceedings number. During his detention, the investigator was allegedly unable to explain the substance of the offence attributed to him, which Mahamedrasulov said he learned only later from the motion seeking the application of a preventive measure. He also stated that, as with other Bureau employees, all of his electronic storage devices were seized in an apparent attempt to obtain as much information as possible about their activities, movements, whistleblowers, and individuals who had provided information to NABU[141]. Mahamedrasulov rejected the claim made by Vasyl Maliuk, Head of the SSU[142], during a press briefing that he had behaved aggressively during the search. The defence was not provided with either the video recording of the search or other documents relating to the investigative actions. Mahamedrasulov emphasised that, during his detention, he had been *"treated like a terrorist"*[143].

Moments before the search of Ruslan Mahamedrasulov's apartment on 21 July 2025. Screenshots from surveillance camera footage.

The video was published on AntAC's YouTube channel on 12 December 2025

The NABU official stated that, during the search, officers forced him face down onto the floor several times. One of the photographs published in the SSU's press release of 21 July 2025 shows an SSU officer standing over him while pointing an assault rifle at him. Mahamedrasulov further stated that searches were carried out at all of his addresses in Kyiv and Dnipro and that the only item found was EUR 2,500 in cash. According to him, however, the cash was not recorded in the search record and subsequently disappeared from his apartment in Dnipro[144]. According to Olena Shcherban, an AntAC Board member and lawyer representing the NABU official, the detention and searches – which were accompanied by beatings and the use of physical force – as well as his detention in a cell under special supervision without access to adequate medical care, amounted to torture[145].

141 "To SIZO Over the Mindich Case – The First Video with NABU Detective Mahamedrasulov", Anti-Corruption Action Centre YouTube channel, 12 December 2025: https://youtu.be/uZyxbOtMOug?t=765

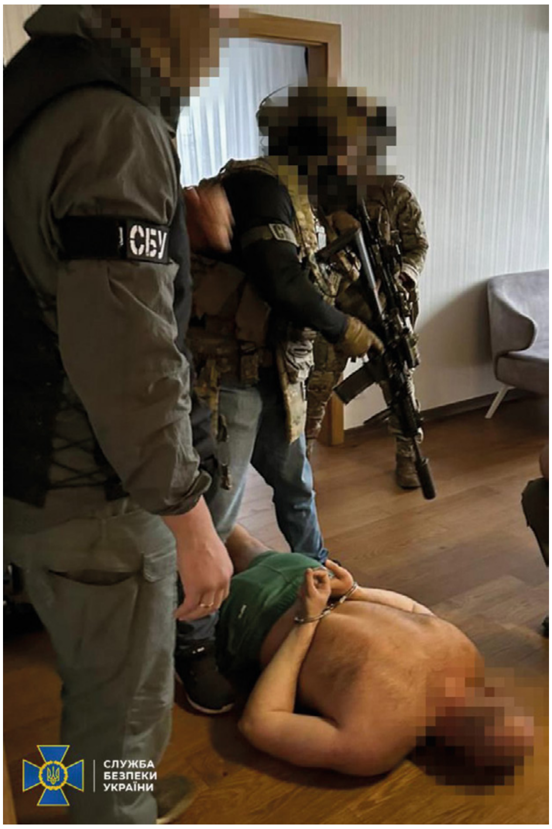
142 "Searches at NABU! The Law No. 12414 Scandal! Vasyl Maliuk and Ruslan Kravchenko Answer Questions! Full Version", TSN YouTube channel, 22 July 2025: https://youtu.be/xHvAeQZEUb4?t=387

143 "New Secrets of the Mindich Tapes. Where Is the Notice of Suspicion for Yermak? Envelopes for MPs. Operation "Midas" Continues", Ye Pytannia YouTube channel, 17 December 2025: https://www.youtube.com/watch?v=Qc1bC0vqZ5Q&t=792s

144 "How the System Shields Criminals. Mindich on the Radar. Russian Passport Held by His Father – Ruslan Mahamedrasulov", Radio NV, 19 December 2025: https://youtu.be/8NyF_D-gQIQ?t=2087

145 "Court Under Pressure. How Did the Camouflaged Crowd Expose the SSU? The Plan to Frame a NABU Detective Collapsed", Zaliznyi Nardep YouTube channel, 27 August 2025: https://youtu.be/5F9MbY1dKio?t=350

Ruslan Mahamedrasulov stated that simultaneous searches without court warrants were also carried out at his rented apartment and office in Dnipro, at apartments in Kyiv belonging to him and his father, and at the apartments of his sister and mother. According to him, searches were also conducted that same day at the premises of businesses with which Sentiabr Mahomedrasulov had cooperated. The Pecherskyi District Court of Kyiv ordered the seizure of property confiscated during the searches of his home and workplace, which included his vehicle, firearms lawfully possessed by him, and property belonging to his parents.



Photograph of the detention of Ruslan Mahamedrasulov, 21 July 2025.
Photo credit: Security Service of Ukraine

In December 2025, the Pecherskyi District Court of Kyiv lifted the seizure of his vehicle[146], while the Kyiv Court of Appeal lifted the seizure of the firearms[147] and other property seized from his office in Dnipro[148]. According to the defence, however, those court decisions were not implemented for a considerable period: the vehicle was returned only in March 2026, while the remaining property, apart from the firearms, had still not been returned by that time. In April 2026, following appellate review, the seizure of property confiscated from the apartment in Dnipro was also lifted[149]. As of May 2026, nearly all of the seized property had been returned to the detective, except for his mobile phones and ammunition.

According to the investigation, Ruslan Mahamedrasulov acted as an intermediary in the sale of industrial hemp to Dagestan, which investigators allege had been unlawfully cultivated by his father in the Zhytomyr region. As its principal piece of evidence, the SSU released an audio recording of a conversation involving the NABU official in which he discusses the terms of a sale of hemp seeds that, according to the transcript of the conversation, were *"in high demand under a state programme in Dagestan"*, and promises to send the prospective buyer a commercial offer. Relying on the findings of a state forensic semantic and textual examination, the investigators maintain that the participants in the recorded conversation were referring specifically to trade with the Russian republic of Dagestan.

The SSU's press release stated that his father held Russian citizenship and alleged that the NABU official had concealed this fact when obtaining security clearance. With regard to his mother, Iryna Mahamedrasulova, the SSU alleged that she lived in Kyiv but received a pension from the so-called "DPR", posted pro-Russian comments on social media, and expressed support in private conversations for Russia's war against Ukraine and for war crimes committed by Russian forces. The SSU also released photographs of the head of the detective unit during a stay in Spain, alleging that he had been vacationing at resorts instead of working in the frontline regions around Dnipro[150].

According to the investigation, the official had been in contact with Fedir Khrystenko, a fugitive member of parliament from the banned pro-Russian OPFL, who was alleged to have close ties to the Russian

146 Ruling of the Pecherskyi District Court of Kyiv of 30 December 2025 in Case No. 757/65099/25-k

147 Ruling of the Kyiv Court of Appeal in Case No. 757/35481/25-k / Unified State Register of Court Decisions, 4 December 2025: https://reyestr.court.gov.ua/Review/132496608

148 Ruling of the Kyiv Court of Appeal in Case No. 757/34901/25-k / Unified State Register of Court Decisions, 18 December 2025: https://reyestr.court.gov.ua/Review/132955981

149 Ruling of the Kyiv Court of Appeal in Case No. 757/35305/25-k / Unified State Register of Court Decisions, 20 April 2026: https://reyestr.court.gov.ua/Review/136092456

150 "The SSU and the OPG Detain a Senior NABU Detective on Suspicion of Conducting Business in Russia", Security Service of Ukraine YouTube channel, 21 July 2025: https://www.youtube.com/watch?v=P3dqg7A3x3U

security services[151]. Mahamedrasulov acknowledged that he knew Khrystenko, as he knew many other members of parliament, explaining that this was due to the nature of his work. He believes that Khrystenko gave the testimony that the SSU had expected from him[152].

On 22 July 2025, the Pecherskyi District Court of Kyiv, sitting in a closed hearing, remanded Ruslan Mahamedrasulov and his father in custody for two months without the possibility of bail[153].

In August, Semen Kryvonos, Director of NABU, stated that the Bureau had immediately launched two internal investigations (the second concerned Viktor Husarov, a detective from the undercover "D-2" unit who was accused of spying for Russia's FSB – see below) and had requested that the SSU provide the case materials allegedly demonstrating pro-Russian influence[154]. Kryvonos also called on the SSU to make public the investigation materials relating to the treason case involving the two NABU officials. Oleksandr Klymenko, Head of SAPO, likewise stated that the SSU should publicly disclose the evidence supporting the accusations against the two NABU detectives[155]. In response, the SSU stated that, on 7 August 2025, its investigators had provided the Director of NABU with selected materials substantiating the notices of suspicion served on the two officials, adding that the full body of evidence would be submitted exclusively to the court[156].

On 22 August 2025, the SSU published what it described as new evidence alleging that Ruslan Mahamedrasulov and his father had organised illegal trade with Russia. The SSU released screenshots of correspondence between the NABU official's father and a representative of an agricultural company in Dagestan concerning the sale of industrial hemp. In particular, a representative of the Russian company Agroprime stated that he had received a commercial offer and requested up-to-date product quality certificates, explaining that the documents were urgently needed because the Russian state programme reimbursing the costs of industrial hemp cultivation was about to expire. He also identified the person who had sent the commercial offer, whose name matched that of the NABU official. According to the SSU, it was the NABU official who organised the alleged illegal business, while his father acted on his instructions and supervised the agricultural operations on the ground. Relying on the official's correspondence, the investigators further alleged that he had been seeking not only trading contacts but also investors for the business[157].

Olena Shcherban questioned the reliability of this evidence, particularly the published audio recording. She argued that, in the noise-filtered version of the recording[158], the word "Uzbekistan" can be heard instead of "Dagestan", fundamentally changing the context and meaning of the conversation and undermining the substance of the alleged offence. She further stated that it was necessary to establish both whether the voice on the recording belonged to the suspect and whether the audio corresponded to the transcript through a forensic voice examination – however, according to Shcherban, the SSU has not provided the defence with the original recording. She also drew attention to the document presented by the SSU as evidence of the state programme relating to hemp cultivation. According to Shcherban, the document concerns rules governing subsidies to constituent entities of the Russian Federation for the production of various agricultural products within Russia. Accordingly, Ukrainian industrial hemp could not, in practice, have been supplied under that programme. She noted that Uzbekistan had legalised

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151 "The SSU and the OPG Detain a Senior NABU Detective on Suspicion of Conducting Business in Russia (Video)", Security Service of Ukraine, 21 July 2025: https://ssu.gov.ua/novyny/sbu-ta-ohp-zatrymaly-za-pidozroiu-u-vedenni-biznesu-v-rf-odnoho-iz-kerivnykiv-detektyviv-nabu-video

152 "New Secrets of the Mindich Tapes. Where Is the Notice of Suspicion for Yermak? Envelopes for MPs. Operation "Midas" Continues", Ye Pytannia YouTube channel, 17 December 2025: https://www.youtube.com/watch?v=Qc1bC0vqZ5Q&t=2336s

153 "Searches at NABU: Court Places Mahamedrasulov and His Father in Pre-Trial Detention", Suspilne News, 22 July 2025: https://suspilne.media/1072815-u-kievi-vidbuvaetsa-sud-u-spravi-magamedrasulova/

154 "Semen Kryvonos, Director of NABU, on Defence Sector Investigations and Pressure on Detectives – BBC Interview", BBC News Ukrainian, 3 August 2025: https://www.bbc.com/ukrainian/articles/cvg48vn9vy0o

155 "NABU and SAPO Results for the First Half of 2025", Media Center Ukraine YouTube channel, 8 August 2025: https://www.youtube.com/live/j13E9b9NO-U

156 "Comment on the Statement Made by the Heads of NABU and SAPO in the Media", Security Service of Ukraine, 8 August 2025: https://ssu.gov.ua/novyny/ofitsiino8

157 "The SSU Releases New Evidence in the Case of a Senior NABU Official Suspected of Trading with Russia", Security Service of Ukraine YouTube channel, 22 August 2025: https://www.youtube.com/watch?v=p59mpWKwGRI

158 "Remember "Dagestan", Where the Father of a NABU Detective Allegedly Wanted to Sell Hemp Seeds?" Vitaliy Shabunin Facebook page: https://www.facebook.com/share/p/1B8dVr3fzg/; audio recording available via the link: https://drive.google.com/file/d/1EiAuYHo-foUolnRoltHhl6TVTsql4n0W/view

the cultivation of industrial hemp in March 2020 and adopted a separate government resolution[159], regulating the sector[160].

Yaroslav Zhelezniak, a Member of the Verkhovna Rada of the ninth convocation from the Holos party, stated that the SSU's evidentiary materials were inconsistent and contained indications of possible fabrication. In addition to the discrepancy concerning the countries mentioned in the above audio recording, he identified a number of other inconsistencies, including in the legal and regulatory documents relied upon by the investigation[161]. Zhelezniak also noted that the "correspondence" with the prospective buyer began on 10 July, after the deadline for applying for the relevant subsidies had already expired. Furthermore, one of the email addresses provided for sending the commercial offer belonged not to Agroprime but to a children's rehabilitation centre (the company may previously have participated in a procurement procedure involving the centre)[162]. According to his investigation, Agroprime was engaged solely in fruit and vegetable cultivation, had never imported anything into Russia, and, since 2023, had itself been under investigation for allegedly unlawfully obtaining a subsidy of RUB 22.2 million. Consequently, he argued, the company could not have been eligible to receive a subsidy in Dagestan[163].

Transparency International Ukraine pointed to "*a mismatch between the seriousness of the allegations and the quality of the evidence presented*", identifying a number of problematic aspects. In addition to the issues outlined above, its analysts also highlighted what they described as manipulative elements in the SSU's public communication concerning the citizenship of Mahamedrasulov's parents, the source of his mother's income, and the suspect's travel abroad during the war – information that was unrelated to the substance of the allegations but "*could provoke an emotional response from the audience*"[164].

In interviews given in December 2025, Ruslan Mahamedrasulov also responded to these allegations. He stated that his father had obtained a Russian passport long before 2014 and that he had been unaware of this fact when applying for security clearance. In Mahamedrasulov's view, possession of a Russian passport, in itself, does not constitute evidence of high treason. He also stated that, because he had only infrequent contact with his mother, he was not in a position to comment extensively on the information concerning her, but expressed scepticism about the published screenshots, suggesting that they could have been fabricated[165].

Ruslan Mahamedrasulov argued that the allegations concerning a "Russian connection" were based to a significant extent on his ethnic background, noting that his father is of Dagestani origin. According to the NABU official, this amounted to *"blatant racism"*, with alleged Russian influence being inferred solely from his surname. Responding to the allegations concerning the discussion of industrial hemp, he maintained that the conversation had in fact been about Uzbekistan. Mahamedrasulov explained that he had lived in Turkmenistan for ten years – a country with climatic and economic characteristics

159 See Cabinet of Ministers of the Republic of Uzbekistan Resolution No. 770 of 7 December 2020: Ўзбекистон Республикаси Вазирлар Маҳкамасининг қарори «Каннабис ўсимлигини гиёҳвандлик воситалари ва психотроп моддалар ишлаб чиқариш ҳамда тайёрлаш билан боғлиқ бўлмаган саноат мақсадларида етиштириш ва фойдаланиш фаолиятини тартибга солиш чора-тадбирлари тўғрисида», 7.12.2020, 770-сон: https://lex.uz/ru/docs/5145446

160 "How the Case Against the Head of NABU Detectives Who Was Gathering Evidence on Zelenskyy's Associate, Mindich, Is Being Fabricated", Ukrainska Pravda, 25 August 2025: https://www.pravda.com.ua/columns/2025/08/25/7527668/

161 1) The above-mentioned Resolution of the Government of the Russian Federation provides subsidies only for crops cultivated within the territory of the Russian Federation and included in the Russian register of approved plant varieties. Two of the three hemp varieties ("Liryna and Hlesiia") requested by the prospective buyer in the correspondence are not included in that register and are therefore, in practice, unlawful. See: Resolution of the Government of the Russian Federation No. 1932 of 26 November 2020 "On Amendments to Appendices No. 7 and 8 to the State Programme for the Development of Agriculture and the Regulation of Agricultural Product, Raw Material and Food Markets". http://publication.pravo.gov.ru/Document/View/0001202012010012
2) 2) Under the relevant Resolution of the Government of the Republic of Dagestan, hemp is not included in any of the subsidised categories. The resolution likewise applies only to crops cultivated within the territory of the Russian Federation, rather than imported crops. See: Resolution of the Government of the Republic of Dagestan No. 25 of 19 February 2024 "On Approving the Rules for Granting Subsidies from the Republican Budget of the Republic of Dagestan for the Development of Priority Crop Production Sectors in the Republic of Dagestan and on Repealing Certain Acts of the Government of the Republic of Dagestan": http://publication.pravo.gov.ru/document/0500202402220011

162 The email address gbu_rd_rdrc_05@mail.ru belongs to the State Budgetary Institution of the Republic of Dagestan "Republican Children's Rehabilitation Centre".

163 "The Case of NABU Detective Mahamedrasulov: How Is the SSU Fabricating Evidence? Ten Facts Exposing the Fabrication", Zaliznyi Nardep YouTube channel, 26 August 2025: https://www.youtube.com/watch?v=77TQ_lONcMs

164 "Key Questions About the Cases Against NABU Employees", Transparency International Ukraine, 8 October 2025: https://ti-ukraine.org/news/klyuchovi-pytannya-pro-spravy-shhodo-pratsivnykiv-nabu/

165 "How the System Shields Criminals. Mindich on the Radar. Russian Passport Held by His Father – Ruslan Mahamedrasulov", Radio NV, 19 December 2025: https://youtu.be/8NyF_D-gQIQ?t=1353

similar to those of Uzbekistan. He added that cotton, which had been discussed at the beginning of the conversation, is one of the principal sources of income for both countries[166].

According to Ruslan Mahamedrasulov, he underwent two complex cerebrovascular surgeries in the spring of 2025 and was undergoing rehabilitation, while his trip to Spain took place during that period while he was on medical leave[167]. He also argued that photographs taken on the territory of another country – which could not have been obtained directly – raise questions as to their lawfulness, since he has not been provided with any information regarding the relevant CISA[168].

On 25 August 2025, the Kyiv Court of Appeal adjourned the hearing on the appeal against the preventive measure because the NABU official had not been brought from the Kyiv SIZO to the court, and the judge refused to conduct the hearing remotely. Ruslan Mahamedrasulov had submitted a request in advance asking to be brought to court and ultimately did not object to the appeal being heard by videoconference. According to journalists from Slidstvo.Info, a group of men dressed in black gathered outside the court before the hearing. They refused to answer journalists' questions, stating only that they were at the court "for fun" and were dressed similarly simply because they liked wearing black. Men in military-style clothing without insignia also declined to speak to journalists. The group carried placards reading "Traitors must be punished!", "There is a war in Ukraine, and you are doing business with Russia", and similar slogans[169].

Ruslan Mahamedrasulov during the hearing on the prosecution's motion to extend his preventive measure at the Pecherskyi District Court of Kyiv, 12 September 2025. Beside him are his lawyers: Olena Shcherban (left) and Tetiana Melnyk (right). Photo credit: Anastasiia Pervieieva for Watchers

On 25 August 2025, NABU employees submitted a collective petition to the Kyiv Court of Appeal requesting that the case of their colleague, Ruslan Mahamedrasulov, be heard in public. The letter, signed by approximately 300 employees, stated that those at NABU were "*firmly convinced that the events involving employees of the National Bureau in July 2025 constituted procedural arbitrariness driven by political motives*"[170].

In September, the proceedings were further delayed. The Kyiv Court of Appeal adjourned the hearing on the appeal against the preventive measure due to the illness of one of the judges[171], while the Pecherskyi

166 "Detention in SIZO / More Than 100 SSU Searches / Pressure on NABU – Mahamedrasulov | UP Interview", Ukrainska Pravda YouTube channel, 18 December 2025: https://www.youtube.com/watch?v=x-42oW3IoOg&t=1463s

167 "From SIZO – About Mindich. The Detective Whose Case Drew Zelenskyy into the NABU and SAPO Scandal Speaks to NV for the First Time About How He Ended Up Behind Bars", NV, 19 August 2025: https://nv.ua/ukr/ukraine/politics/detektiv-nabu-yakogo-zatrimalo-sbu-rozpoviv-pro-rozsliduvannya-po-mindichu-ta-obshuki-50538127.html

168 ""They Beat Me and Broke My Joints". The Detective in "Mindichgate" on SSU Methods, Pressure on NABU, and Zelenskyy's Associates", Radio Free Europe/Radio Liberty YouTube channel, 19 December 2025: https://youtu.be/mNTGkIf6Xj0?t=3003

169 ""We're Here Just for Fun, We Simply Like Wearing Black": People Dressed in Black and Military Personnel Appear at the Hearing of a NABU Detective's Case; the Hearing Is Adjourned Until 9 September", Slidstvo.Info, 25 August 2025: https://www.slidstvo.info/news/my-tut-po-prykolu-prosto-liubymo-chornyy-odiah-u-sudi-shchodo-detektyva-nabu-z-iavylysia-liudy-v-chornomu-ta-viyskovi-same-zasidannia-vidklaly-do-9-veresnia/

170 "NABU Asks the Court to Hold an Open Hearing in the Case of Its Employee Mahamedrasulov", Radio Free Europe/Radio Liberty, 25 August 2025: https://www.radiosvoboda.org/a/news-nabu-sud/33512336.html

171 "The Case of Mahamedrasulov, Who Is Being Held in SIZO: Judges Played into the SSU's Hands and Denied the Detective the Right to Appeal", Anti-Corruption Action Centre, 9 September 2025: https://surl.li/ffpdvd

District Court postponed a hearing because the defence had been notified only two hours before it was due to begin[172]. Security measures were also tightened during several hearings: Mahamedrasulov was escorted by six to eight custodial officers, who restricted his communication with journalists.

On 12 September 2025, Oleh Bilotserkivets, a judge of the Pecherskyi District Court of Kyiv, ordered that the Head of the NABU detective unit remain in custody until 21 October 2025. The prosecution argued that extending the preventive measure was necessary because of the risks that he might abscond from the investigation, including by leaving the country, or influence witnesses or public officials known to him. Prosecutors further contended that Mahamedrasulov's alleged damage to his mobile phone during the search indicated an intention to obstruct the investigation. The defence, however, argued that these risks were unfounded and maintained that his actions with the device had been aimed at protecting sensitive information[173].

On 16 September 2025, the SSU, the OPG, and the SBI served a senior NABU official with a new notice of suspicion for trading in influence[174]. According to the investigation, which relied, inter alia, on information obtained from the suspect's mobile phone, he allegedly manipulated tax-related procedures on behalf of several Ukrainian companies believed to be linked to a "conversion centre". According to the case materials, he agreed to help remove approximately ten companies from the list of high-risk taxpayers, which, according to the investigation, would have enabled the interested parties to carry out financial transactions worth nearly UAH 30 million. In return, he was allegedly promised an undue benefit of UAH 900,000[175].

Experts from Transparency International Ukraine considered the information disclosed insufficient to support the conclusion that a criminal offence had been committed[176]. Mahamedrasulov himself stated that he had been conducting operational work and argued that, under such an approach, the content of work-related correspondence could be manipulated to justify dozens of notices of suspicion against him.

On 23 September 2025, the Kyiv Court of Appeal upheld Mahamedrasulov's detention[177]. The defence requested that Yusuf Mameshev be examined as a witness, but the court dismissed the motion.

On 8 October 2025, Roman Novak, a judge of the Pecherskyi District Court of Kyiv, refused to relax the preventive measure imposed on Ruslan Mahamedrasulov, leaving him in custody. The defence stated that it had not been provided with the materials allegedly substantiating the risks relied upon to justify his continued detention and that the notice of suspicion materials it had received concerned not the NABU official himself but his father. Before the hearing began, Mahamedrasulov was held in a glass defendant's enclosure under the supervision of approximately five to six guards. During the hearing, he was seated next to his lawyers. However, while the judge was in the deliberation room, he was placed back into the glass enclosure and was not allowed to communicate confidentially with his lawyers[178].

On 15 October 2025, the Pecherskyi District Court of Kyiv extended the pre-trial investigation in Ruslan Mahamedrasulov's case until 21 January 2026. The head of the detective unit was brought to court together with his father. Prosecutors sought to have members of the media removed from the courtroom but were unable to substantiate their request. Following a recess, the prosecutor stated that he no

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172 "Searches at NABU: Lawyers for NABU Detective Mahamedrasulov Failed to Arrive at the Court Hearing in Time", Suspilne News, 11 September 2025: https://suspilne.media/1112748-obsuki-u-nabu-advokati-detektiva-nabu-magamedrasulova-ne-vstigli-pributi-na-zasidanna-sudu/

173 "A Hacked Phone, Uzbekistan or Dagestan, and Allegations of Pressure: New Details in the Case of NABU Detective Mahamedrasulov", Watchers, 16 September 2025: https://watchers.media/news/zlamanyj-telefon-uzbekystan-chy-dagestan-i-zayavy-pro-tysk-novi-detali-spravy-shhodo-detektyva-nabu-magamedrasulova/

174 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 369(2): https://zakon.rada.gov.ua/laws/show/2341-14#Text

175 "The SSU, the OPG and the SBI Serve a New Notice of Suspicion on Arrested Senior NABU Official: He Allegedly Assisted Conversion Centres with Fraudulent Schemes (Video)", Security Service of Ukraine, 16 September 2025: https://ssu.gov.ua/novyny/sbu-ohp-ta-dbr-povidomyly-pro-novu-pidozru-zaareshtovanomu-vysokoposadovtsiu-nabu-vin-dopomahav-iz-makhinatsiiamy-konvertatsiinym-tsentram-video

176 "Key Questions About the Cases Against NABU Employees", Transparency International Ukraine, 8 October 2025: https://ti-ukraine.org/news/klyuchovi-pytannya-pro-spravy-shhodo-pratsivnykiv-nabu/

177 "Searches at NABU: Court of Appeal Leaves Detective Mahamedrasulov in Custody", Suspilne News, 23 September 2025: https://suspilne.media/1121998-obsuki-u-nabu-apelacijnij-sud-zalisiv-detektiva-magomedrasulova-pid-vartou/

178 "Court Considers Easing the Preventive Measure Imposed on Former NABU Detective Mahamedrasulov", ZMINA, 8 October 2025: https://zmina.info/news/sud-rozglyadaye-mozhlyvist-pomyakshennya-zapobizhnogo-zahodu-eksdetektyvu-nabu-magamedrasulovu/

longer objected to media attendance or the live broadcast of the hearing, although journalists had already left the court. The defence argued that Mahamedrasulov's case fell within the jurisdiction of the HACC and requested that it be referred to the Kyiv Court of Appeal for a determination of jurisdiction. Svitlana Shaputko, the presiding judge, dismissed the motion.

During the hearing, the court examined Yusuf Mameshev, who confirmed that the conversation released by the SSU had indeed taken place with him and had concerned Uzbekistan. The witness also stated that, after 20 August 2025, he had come under pressure from SSU officers. The prosecutor sought to admit a forensic psychological assessment of Mameshev's behaviour during questioning into evidence; however, according to the defence, the expert's certification had expired[179].

Hearing in Ruslan Mahamedrasulov's case at the Kyiv Court of Appeal, 12 November 2025.

Photo credit: Hanna Chekhovych for ZMINA

On 17 October 2025, the Pecherskyi District Court of Kyiv ordered that Ruslan Mahamedrasulov and his father remain in custody until 15 December 2025. Investigating judge Serhii Vovk refused the defence's request to change the court's jurisdiction, stating that he had no authority to refer the case to the Kyiv Court of Appeal. Judge Vovk also dismissed the defence's motion to examine Denys Hiulmahomedov, NABU's First Deputy Director, on the grounds that he was not mentioned in the notice of suspicion. The court granted the defence's request to examine Yusuf Mameshev as a witness. During his testimony, Mameshev once again confirmed that the conversation concerning the sale of industrial hemp had taken place with him and had related to Uzbekistan. He also stated that he continued to face pressure: he had been served with several new summonses for questioning by the SSU in a new criminal case opened after his testimony in court on 15 October 2025 (see the section on Yusuf Mameshev below).

On 12 November 2025, the Kyiv Court of Appeal adjourned the hearing of the defence's appeal to allow for a more detailed examination of the case materials, scheduling the next hearing for 26 November[180]. Several dozen people attended the hearing, including representatives of the media, civil society, and NABU detectives. The large number of custodial officers escorting Ruslan Mahamedrasulov drew particular attention, as did the security measures involving the closure of court corridors while he was being escorted to the hearing. At least six custodial officers remained stationed next to the glass defendant's enclosure in which the NABU official was being held. Mahamedrasulov was not able to communicate confidentially with his lawyers.

Semen Kryvonos, Director of NABU, commented that the appellate proceedings in Mahamedrasulov's case were being conducted in an unreasonable manner and were a cause for concern: hearings were repeatedly adjourned, while the court had issued almost no substantive rulings. According to him, similar problems could also be observed in cases involving other Bureau employees[181].

On 26 November 2025, the appeal hearing concerning Ruslan Mahamedrasulov's detention was scheduled to take place, but less than an hour before the hearing the Kyiv Court of Appeal was

179 "The Mahamedrasulov Case: The Pecherskyi District Court Extends the Pre-Trial Investigation Until January", Anti-Corruption Action Centre Telegram channel, 15 October 2025: https://t.me/fuckcorruption/4501

180 "Kyiv Court of Appeal Again Postpones Consideration of the Appeal in the Case of Ruslan Mahamedrasulov, NABU Detective", ZMINA, 12 November 2025: https://zmina.info/news/kyyivskyj-apelyaczijnyj-sud-znovu-vidklav-rozglyad-skargy-u-spravi-detektyva-nabu-ruslana-magamedrasulova/

181 "The Heads of NABU and SAPO on Mindich and Chernyshov | UP Chat", Ukrainska Pravda YouTube channel, 13 November 2025: https://www.youtube.com/watch?v=RCTC-vx4xNY®t=2138s

evacuated following a bomb threat. As a result, the hearing was adjourned until 3 December. According to Olena Shcherban, his lawyer, the court adjourned the hearing because the building was allegedly to be inspected until the end of the day. However, the lights remained on inside the court building, and court staff were seen entering and leaving it. Several dozen activists, civil society representatives, and media workers gathered outside the court demanding Mahamedrasulov's release from the Kyiv SIZO[182].

The Kyiv Court of Appeal, where the hearing of Ruslan Mahamedrasulov's appeal against his detention was cancelled on 26 November 2025 following a bomb threat.

Photo credit: Hanna Chekhovych for ZMINA

On 3 December 2025, the Kyiv Court of Appeal, sitting as a panel composed of reporting judge Valerii Lashevych and judges Tetiana Kahanovska and Ivan Rybak, ordered Ruslan Mahamedrasulov's release from custody in the courtroom. He was ordered to appear upon the first request of the investigator conducting the pre-trial investigation.

The Kyiv Court of Appeal ordered Ruslan Mahamedrasulov's release from custody in the courtroom on 3 December 2025.

Photo credit: ZMINA

In the Kyiv SIZO, Ruslan Mahamedrasulov was held alone in a small cell measuring 2 by 3 metres, under round-the-clock surveillance, while his meetings with his lawyers were video recorded. According to Mahamedrasulov, during the first two months the cell had a broken window, a "barely usable" bed, and a completely damaged floor[183]. He also stated that control in the Kyiv SIZO was extremely strict and that he had almost no communication with anyone other than his lawyers and operatives, although even those communications were monitored. According to him, SSU representatives attempted to create the worst possible detention conditions for him and to maintain full control over him[184].

On 17 February 2026, during an HACC hearing on the preventive measure for former Minister of Justice Herman Halushchenko, the SAPO prosecutor alleged that Halushchenko had been involved in creating intolerable detention conditions for detained NABU official Ruslan Mahamedrasulov in the Kyiv SIZO. The prosecutor disclosed a message sent on 21 July 2025 by Deputy Minister of Justice Yevhen Pikalov to the former

182 "Court "Bomb Threat" Reported Before the Hearing in the Case of NABU Detective Mahamedrasulov – The Hearing Was Postponed", ZMINA, 26 November 2025: https://zmina.info/news/pered-rozglyadom-spravy-detektyva-nabu-magamedrasulova-sud-zaminuvaly-sluhannya-perenesly/

183 "To SIZO Over the Mindich Case – The First Video with NABU Detective Mahamedrasulov", Anti-Corruption Action Centre YouTube channel, 12 December 2025: https://www.youtube.com/watch?v=uZyxbOtMOug&t=1549s

184 "How the System Shields Criminals. Mindich on the Radar. Russian Passport Held by His Father – Ruslan Mahamedrasulov", Radio NV, 19 December 2025: https://youtu.be/8NyF_D-gQIQ?t=2663

minister. The full text of the message was later read out by Oleksandr Abakumov during a meeting of the Verkhovna Rada Committee on Anti-Corruption Policy: "*Good afternoon. We have received a request from the SSU regarding the detained Head of a NABU detective unit once he arrives at the SIZO. He will most likely have a preventive measure imposed tomorrow and will then be brought to the Lukyanivska SIZO. They are asking for a vacant cell with unpleasant cellmates, allegedly because the suspect was rude to SSU officers during the searches. SSU officers are now on their way to meet with the SIZO management*". Later that same day, Pikalov sent a photograph of the cell, to which Halushchenko replied: "+".

In response to an inquiry by Anastasiia Radina requesting an inspection of Ruslan Mahamedrasulov's detention conditions, the Ministry of Justice sent a reply on 4 October 2025, signed by Yevhen Pikalov, stating that the conditions "*complied with the requirements of departmental regulations and were satisfactory*". By contrast, in response to the same inquiry on 3 October, Dmytro Lubinets, Ombudsman, reported that violations of the detention conditions had been identified, including inadequate lighting, the absence of proper night lighting (with daytime lighting left on throughout the night), a broken windowpane, mould on the window frames, and the absence of hot water in the shower facilities. According to Radina, following the inspection, the broken window was repaired and the mould on the walls was removed.

During a meeting of the Committee on Anti-Corruption Policy, Yevhen Pikalov explained that his message had been intended to show the newly appointed minister the actual conditions in the Kyiv SIZO, particularly with regard to standard (non-paid) cells. He acknowledged that the photograph was appalling but claimed that it reflected the condition of approximately 95% of the cells and was not the worst one. He also stated that Ruslan Mahamedrasulov had been held alone in a two-person cell throughout his detention, without cellmates. Anastasiia Radina noted that this arrangement was required under the applicable rules for law enforcement officers. Semen Kryvonos stated that NABU had been working through non-public interagency channels to improve the detention conditions and that, ultimately, the NABU official's father was moved to a paid cell, although this occurred only after information about Operation "Midas" had become public[185].

Ruslan Mahamedrasulov linked both his own arrest and that of his father to the Mindich case, as well as to investigations involving senior SSU officials from the former Department "K" – the anti-corruption directorate, whose functions are now part of the DPNS. Although surveillance is a routine aspect of work for NABU detectives, Mahamedrasulov said he had noticed that, from the beginning of 2025, certain senior SSU officials had begun avoiding operational meetings with him. In his view, this suggested that his communications were likely being intercepted and that he was under surveillance. The NABU official also stated that investigators had seized a substantial amount of official equipment, including mobile phones, hard drives, USB flash drives, and laptops. After bypassing the devices' security protections, the SSU allegedly gained access to a large volume of materials, enabling it to identify information sources, confidential contacts, and other sensitive operational information[186].

The SIZO cell in which Ruslan Mahamedrasulov was held from July to December 2025.
Photo published on Vitaliy Shabunin's Facebook page on 4 December 2025

185 "Parliament Summons the SSU, NABU and SAPO. Obstruction in the "Midas" Case. Draft Exemptions for Telegram Channel Owners", Zaliznyi Nardep YouTube channel, 26 February 2026: https://youtu.be/vbRMgVx4uns?t=2896

186 ""Mindich Was the Coordinator, but Not the Scheme's Main Beneficiary" – Blitz Interview with Ruslan Mahamedrasulov, NABU Detective", Suspilne News, 18 November 2025: https://surl.li/zpwipk

Mahamedrasulov also described what he characterised as intense pressure on witnesses and people within his network of contacts. According to him, individuals were taken away, beaten, subjected to repeated searches, and threatened. He further claimed that some provided "incriminating" testimony under such pressure. He also stated that the atmosphere of intimidation made it difficult to find legal representation: one lawyer's premises had been searched, while another had allegedly been threatened with mobilisation. As a result, lawyers often refused to represent him or demanded prohibitively high fees[187]. According to Mahamedrasulov, the SSU conducted more than 100 searches involving individuals from his contact list as part of the investigation; he also alleged that people had been beaten and detained by the SSU for several days[188]. He further reported systematic surveillance of his relatives, including his sisters. In his view, the surveillance was at times carried out overtly, indicating an intention to exert pressure rather than merely gather evidence[189].

On 19 January 2026, Oleh Bilotserkivets, an investigating judge of the Pecherskyi District Court of Kyiv, extended the pre-trial investigation in the cases of Ruslan Mahamedrasulov and his father by three months, until 21 April 2026. Prosecutors Oleksandr Hanilov and Serhii Pavlyk had requested an extension to a total of nine months, citing the volume of procedural actions and the complexity of the case. The defence argued that the motion was purely formal and based on abstract reasoning. Defence lawyer Tetiana Melnyk noted that, despite the involvement of 65 investigators and 42 prosecutors, no new results had been achieved.

In one of his interviews after his release from the Kyiv SIZO, Ruslan Mahamedrasulov stated that, although his detention had involved both psychological and physical pressure, the legal consequences of the proceedings were far more serious because the case had not been closed and the investigation remained ongoing[190]. He added that the pressure on him had not diminished.

As of May 2026, the pre-trial investigation in Mahamedrasulov's case had been completed, and the process of disclosing the criminal case materials to the defence had begun[191].

THE CASE OF SENTIABR MAHOMEDRASULOV

Sentiabr Mahomedrasulov is the father of Ruslan Mahamedrasulov, Head of one of NABU's territorial detective units. He was detained together with his son on 21 July 2025 and, the following day, was remanded in custody without the right to bail until 16 September 2025. Both were notified of suspicion of aiding the aggressor state[192]. According to the investigation, Sentiabr Mahomedrasulov cultivated industrial hemp in the Zhytomyr region, while his son Ruslan acted as an intermediary in its sale to Dagestan[193].

Ruslan Mahamedrasulov confirmed that his father cultivated industrial hemp. According to the NABU official, he had discussed the sale in order to help his father sell the produce more quickly – at the time, Sentiabr Mahomedrasulov had health problems and was preparing for surgery. Mahamedrasulov stated that he had informed the Bureau about his father's hemp business when he applied for the position of head of the unit.[194].

187 "New Secrets of the Mindich Tapes. Where Is the Notice of Suspicion for Yermak? Envelopes for MPs. Operation "Midas" Continues", Ye Pytannia YouTube channel, 17 December 2025: https://youtu.be/Qc1bC0vqZ5Q?t=1831

188 "Detention in SIZO / More Than 100 SSU Searches / Pressure on NABU – Mahamedrasulov | UP Interview", Ukrainska Pravda YouTube channel, 18 December 2025: https://www.youtube.com/watch?v=x-42oW3IoOg®t=3566s

189 Ibid. See Ruslan Mahamedrasulov's explanation on this matter: https://youtu.be/x-42oW3IoOg?t=2978

190 ""They Beat Me and Broke My Joints". The Detective in "Mindichgate" on SSU Methods, Pressure on NABU, and Zelenskyy's Associates", Radio Free Europe/Radio Liberty YouTube channel, 19 December 2025: https://youtu.be/mNTGkIf6Xj0?t=2555

191 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 290: https://zakon.rada.gov.ua/laws/show/2341-14#Text

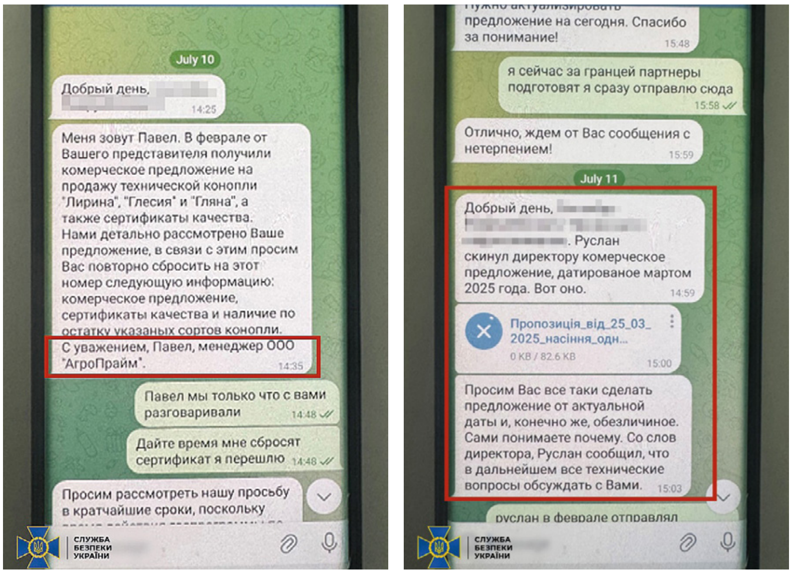
192 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 111-2: https://zakon.rada.gov.ua/laws/show/2341-14#Text

193 "The SSU and the OPG Detain a Senior NABU Detective on Suspicion of Conducting Business in Russia (Video)", Security Service of Ukraine, 21 July 2025: https://ssu.gov.ua/novyny/sbu-ta-ohp-zatrymaly-za-pidozroiu-u-vedenni-biznesu-v-rf-odnoho-iz-kerivnykiv-detektyviv-nabu-video

194 "New Secrets of the Mindich Tapes. Where Is the Notice of Suspicion for Yermak? Envelopes for MPs. Operation "Midas" Continues", Ye Pytannia YouTube channel, 17 December 2025: https://youtu.be/Qc1bC0vqZ5Q?t=1143

Among the evidence relied upon in the case is correspondence between Sentiabr Mahomedrasulov and a representative of what was allegedly a Dagestani agricultural company regarding the sale of industrial hemp, which investigators said was found on the suspect's mobile phone[195]. Olena Shcherban, defence lawyer, has pointed to what she considers indications that the published correspondence was fabricated. She notes, first, that the communication with this contact was not systematic and lasted only a few days in July, beginning approximately ten days before the searches of NABU employees. Second, the commercial offer in Telegram was allegedly sent by the interlocutor himself and was written in Ukrainian. Third, the screenshot shows that the file containing the commercial offer had not been downloaded[196]. According to Ruslan Mahamedrasulov, the Telegram correspondence purportedly sent by his father was fabricated after the phones had been seized and access had been gained to the relevant account[197].

According to the investigation, the NABU official's father corresponded with Fedir Khrystenko, a sitting Member of Parliament from the banned pro-Russian OPFL, who is alleged to have close ties to Russian intelligence services and to have been "responsible for strengthening Russian influence within NABU". According to the SSU, in one exchange they discussed meeting within the EU, while in another Khrystenko wrote that he had been unable to reach the official's son (referring to him only by the first letter of his name for security reasons) and asked for assistance in re-establishing contact. Transparency International Ukraine noted that the official communications issued by the SSU and the OPG failed to explain how exactly the MP had allegedly influenced the Bureau, either in relation to Ruslan Mahamedrasulov or to other NABU officials[198].



Excerpt from the correspondence of the NABU official's father, released by the SSU on 22 August 2025 as evidence of the alleged organisation of illegal trade with the Russian Federation

According to the investigation, Sentiabr Mahomedrasulov holds Russian citizenship, maintained contacts with Russian citizens, including residents of Dagestan, travelled to the Russian Federation in 2023, and also maintained contacts with representatives of the occupation administrations in the TOT of Ukraine. The investigation further alleges that he discussed renewing the registration of his firearm under the laws of the so-called "DPR" with an occupation official in Horlivka[199].

At one of the court hearings, Ruslan Mahamedrasulov stated that his family had moved from Horlivka to Kyiv in 2014, leaving behind their business and real estate. He said he had lived in Ukraine all his life, had only visited Dagestan once as a child, and that the only thing connecting him to Dagestan was his

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195 "The SSU Releases New Evidence in the Case of a Senior NABU Official Suspected of Trading with Russia", Security Service of Ukraine YouTube channel, 22 August 2025: https://www.youtube.com/watch?v=p59mpWKwGRI

196 "How the Case Against the Head of NABU Detectives Who Was Gathering Evidence on Zelenskyy's Associate, Mindich, Is Being Fabricated", Ukrainska Pravda, 25 August 2025: https://www.pravda.com.ua/columns/2025/08/25/7527668/

197 "To SIZO Over the Mindich Case – The First Video with NABU Detective Mahamedrasulov", Anti-Corruption Action Centre YouTube channel, 12 December 2025: https://www.youtube.com/watch?v=uZyxbOtMOug&t=1420s

198 "Key Questions About the Cases Against NABU Employees", Transparency International Ukraine, 8 October 2025: https://ti-ukraine.org/news/klyuchovi-pytannya-pro-spravy-shhodo-pratsivnykiv-nabu/

199 "The SSU and the OPG Detain a Senior NABU Detective on Suspicion of Conducting Business in Russia", Security Service of Ukraine YouTube channel, 21 July 2025: https://www.youtube.com/watch?v=P3dqg7A3x3U, https://www.youtube.com/watch?v=p59mpWKwGRI

surname[200]. Yelyzaveta Mahomedrasulova, his daughter, told the media that her father is of Dagestani origin but has lived in Ukraine for the past 30 years. She stated that doing business with Dagestan had never been discussed in their family and that her father's communication there was limited to close relatives who live there. She also denied that her mother receives a pension from the so-called "DPR". Regarding her father's Russian citizenship, she said that he may once have had it, but that she did not know about it[201].

The appeal proceedings concerning Sentiabr Mahomedrasulov's preventive measure were repeatedly delayed. A hearing scheduled for 8 September 2025 before the Kyiv Court of Appeal was once again adjourned, this time until 17 September. In comments to Ukrainska Pravda, his eldest daughter, Mariia Mahomedrasulova, alleged that her 65-year-old father had been humiliated before the hearing: "*Before the hearing, six to eight uniformed officers took him into a room, told him to strip completely naked, down to his underwear, and then examined him from behind using various devices. They wanted to humiliate him and knew my brother would learn about it and be psychologically devastated. This was done to break my family psychologically and humiliate my father*". According to his daughter, her father did not tell her about the incident immediately and, after the ordeal, said that he no longer wished to attend court hearings[202]. In response to a media inquiry from hromadske, the court stated that, during the proceedings, Sentiabr Mahomedrasulov had not reported any unlawful conduct during his escort. However, information regarding the alleged human rights violation and degrading treatment was referred to the prosecutor's office for verification and an appropriate response[203].

On 11 September 2025, Oleh Bilotserkivets, a judge of the Pecherskyi District Court of Kyiv, ordered that Sentiabr Mahomedrasulov remain in custody until 21 October 2025. The defence requested a less restrictive preventive measure, citing the NABU official's father's heart conditions, which, according to the recommendations of the Ministry of Health of Ukraine, made detention inappropriate. The court dismissed the motion, although it ordered that medical care be provided to him in the Kyiv SIZO. The detainee's daughter also asked the court to allow her father to remain under her care, but the request was not granted[204].

Sentiabr Mahomedrasulov during the hearing on the prosecution's motion to extend his preventive measure at the Pecherskyi District Court of Kyiv, 11 September 2025.

Photo credit: Oleksii Arunian for Suspilne News

On 15 October 2025, the Pecherskyi District Court of Kyiv extended the pre-trial investigation until 21 January 2026[205].

On 17 October 2025, Serhii Vovk, an investigating judge of the Pecherskyi District Court of Kyiv, extended the detention of Sentiabr Mahomedrasulov and his son, the NABU official, until 15 December 2025.

On 4 November 2025, the Kyiv Court of Appeal, sitting as a panel composed of reporting judge Yaroslav Melnyk and judges Viacheslav Hul and Yuliia Matviienko, adjourned the proceedings

200 "'Revenge' for Mindich: Who Is Detective Mahamedrasulov and Why Is Bankova So Afraid of Him?", Ye Pytannia YouTube channel, 15 September 2025: https://youtu.be/yG9amLieE7Y?t=525

201 Ibid.

202 "UP: The Father of the NABU Detective Who Led the Mindich Case Was Stripped Naked in Court; Consideration of the Appeal Is Being Delayed", Ukrainska Pravda, 9 September 2025: https://www.pravda.com.ua/news/2025/09/09/7530026/

203 "Court Comments on Reports That the Father of NABU Detective Mahamedrasulov Was Stripped Naked", hromadske, 13 September 2025: https://hromadske.ua/kryminal/251273-u-sudi-prokomentuvaly-informatsiiu-shchodo-roztiahnennia-dohola-batka-detektyva-nabu-mahamedrasulova

204 Twisted Justice at the Pecherskyi Court / Anti-Corruption Action Centre Facebook page, 11 September 2025: https://www.facebook.com/antac.ua/posts/pfbid076PtmoQnxT8ia3vQNWbcGEh6W4WUTr2tJ5BrAZd9ZVAuAjEc5uSbr16W8F57Btv7l

205 "Pre-Trial Investigation Extended in the Case of NABU Detective Mahamedrasulov", Suspilne News, 16 October 2025: https://suspilne.media/1140094-u-spravi-detektiva-nabu-magomedrasulova-prodovzili-dosudove-rozsliduvanna/

until 2 December 2025 to allow time to examine the case materials. Sentiabr Mahomedrasulov participated in the hearing by video link from the Kyiv SIZO. The defence filed two motions. The first requested that he be provided with appropriate medical care in light of his serious heart conditions. The defence submitted medical examination results and doctors' opinions confirming that he required treatment outside the detention facility. According to the defence, several specialised cardiology institutions, including the Amosov National Institute of Cardiovascular Surgery, had agreed to admit Mahomedrasulov for treatment. However, the administration of the Kyiv SIZO refused, stating that those institutions were not included on the officially approved list. Instead, it provided its own list of medical institutions, but none responded to the requests. The defence also requested that Mahamedrasulov's case be separated from that of his son in order to allow him to undergo medical treatment.

The second motion sought a less restrictive preventive measure. The defence argued that no new evidence had been produced, including any evidence of a hemp cultivation programme in Dagestan or an intention to sell hemp there. It further submitted that the risks which detention was intended to prevent were hypothetical and based on formal assumptions. The prosecution insisted that Sentiabr Mahomedrasulov should remain in custody, citing the particularly serious nature of the suspicion. The prosecutor stated that investigative activities were ongoing, including the questioning of witnesses, that non-public evidence existed, and that the defence had failed to demonstrate any deterioration in the suspect's health[206].

Sentiabr Mahomedrasulov participating by video link from the Kyiv SIZO in a hearing before the Kyiv Court of Appeal, 4 November 2025.

Photo credit: Hanna Chekhovych for ZMINA

On 26 November 2025, the Pecherskyi District Court dismissed a motion to change the preventive measure imposed on Sentiabr Mahomedrasulov. The suspect participated in the hearing by video link. The prosecutor requested that the hearing be adjourned in order to examine the case materials, but the defence objected, noting that the documents had been provided in advance and that the prosecution had had nine days to review them. Defence lawyer also pointed out that all annexes had been submitted electronically and that the prosecution team in the case was already sizeable.

During the hearing, the defence continued to challenge the existence of the risks relied upon by the investigation to justify detention, pointing to the suspect's advanced age (65), his state of health, the absence of complaints from witnesses, and the fact that all evidence had already been collected before his arrest. The defence argued that the alleged risks of obstructing the criminal proceedings or committing another offence were overly abstract and unsupported by evidence. The prosecutor, for his part, continued to insist that Sentiabr Mahomedrasulov remain in custody, citing the seriousness of the alleged offence.

During the hearing, the defence also argued that the detention conditions in the Kyiv SIZO were significantly worsening their client's health. Although the court had previously ordered the Healthcare Centre Branch and the medical unit of the Kyiv SIZO to ensure that the detainee received appropriate medical care, the defence stated that these requirements had not been implemented and that only correspondence between the institutions had taken place. On 19 November 2025, an ophthalmologist at the Kyiv SIZO diagnosed Sentiabr Mahomedrasulov with a complicated cataract in his right eye and recommended elective surgery to remove it. The prosecutor argued that ensuring appropriate medical care did not fall within the powers of the prosecution, as this was the responsibility of medical personnel. The defence, however, pointed out that in September the court had specifically ordered the prosecutor to oversee the provision of such medical care.

206 "Kyiv Court of Appeal Considers the Defence Motion in the Case of Sentiabr Mahomedrasulov", ZMINA, 4 November 2025: https://zmina.info/news/u-kyyivskomu-apelyaczijnomu-sudi-rozglyanuly-klopotannya-zahystu-u-spravi-sentyabra-magamedrasulova/

On 2 December 2025, Mykhailo Yushkov, a judge of the Pecherskyi District Court of Kyiv, ordered the release of Sentiabr Mahomedrasulov from custody and replaced his preventive measure with night-time house arrest. The court partially granted the prosecutor's motion, which had sought continued detention with the possibility of release on bail set at UAH 908,400. The prosecutor argued that continued detention was no longer necessary to the same extent as before. The defence supported changing the preventive measure and requested that house arrest be imposed instead, arguing that the proposed bail amount was excessive for a pensioner and pointing to the deterioration of the client's health[207].

A hearing before the Kyiv Court of Appeal had been scheduled for the same day, but less than an hour before it was due to begin, the court received a bomb threat. A similar incident had occurred on 26 November 2025, when the same court received a bomb threat shortly before the scheduled hearing of the appeal against the detention of Ruslan Mahamedrasulov, Head of a NABU detective unit, resulting in the hearing being adjourned.

Sentiabr Mahomedrasulov with his daughter, Yelyzaveta Mahomedrasulova, outside the Kyiv SIZO after his release from custody on 2 December 2025.
Photo credit: Valeriia Naumenko for ZMINA

It later emerged from the text of the ruling that the hearing before the Kyiv Court of Appeal had proceeded without the participation of the parties[208]. The panel of judges ordered that Sentiabr Mahomedrasulov remain in custody until 15 December 2025, with the possibility of release on bail set at UAH 454,200. The judges justified holding the hearing without the participants in the criminal proceedings on the grounds that they had already heard the parties' positions in full during the hearing on 4 November 2025.

According to Viktor Karpenko, lawyer for Sentiabr Mahomedrasulov, this unusual format of the proceedings could, from a procedural standpoint, be regarded as permissible, although in practice the decision had been made "right on the edge of what was acceptable". Formally, the court justified its actions by referring to the imminent expiry of the preventive measure and the need to issue a decision without delay. Karpenko viewed the appellate court's ruling as broadly positive: rather than automatically extending detention, the court confirmed that release on bail remained possible. He also noted that the court of first instance had reached the same conclusion[209].

The outlet NV published the prosecution's motion to change the preventive measure, which had been submitted by the OPG to the Pecherskyi District Court and signed by prosecutor Oleksandr Hanilov. In a comment to the outlet, an unnamed SAPO prosecutor suggested why what he described as a "face-saving exercise" had taken place: "Had the hearing proceeded before the appellate court and the judges decided to change the preventive measure, the prosecution would have had to acknowledge that the previous court ruling had been unfounded and that there had been no risks justifying Mahamedrasulov's detention in the Kyiv SIZO"[210]. As a result, the first-instance court's ruling imposing night-time house arrest remained in force.

In one of his first interviews after his release from the Kyiv SIZO, Ruslan Mahamedrasulov said that his elderly father had been deeply distressed by the accusations, as he had no involvement in the sale and

207 "Pecherskyi District Court Releases Mahamedrasulov's Father from Custody", Anti-Corruption Action Centre Facebook page, 2 December 2025: https://www.facebook.com/share/p/1JWWkd31wR/?mibextid=wwXIfr

208 Ruling of the Kyiv Court of Appeal in Case No. 757/50824/25-k / Unified State Register of Court Decisions, 2 December 2025: https://reyestr.court.gov.ua/Review/132454922

209 "Court of Appeal Changes the Preventive Measure Imposed on Sentiabr Mahomedrasulov Without the Parties Present on the Day of the Court "Bomb Threat"", ZMINA, 21 January 2026: https://zmina.info/news/apelyaczijnyj-sud-zminyv-zapobizhnyj-zahid-sentyabru-magomedrasulovu-bez-storin-proczesu-u-den-minuvannya-sudu/

210 "Playing for Acquittal. Why the Father of NABU Detective Mahamedrasulov Was Released from SIZO by the Pecherskyi District Court Rather Than the Court of Appeal", NV, 3 December 2025: https://nv.ua/ukr/ukraine/politics/sprava-magamedrasulovih-batka-detektiva-nabu-vidpustili-z-sizo-chomu-ce-zrobiv-pecherskiy-sud-50565495.html

had only been engaged in production. The NABU official stated that his father's health had deteriorated significantly while in custody: he suffered several hypertensive crises and partially lost vision in one eye. Prior to his arrest, Sentiabr Mahomedrasulov had been preparing to undergo surgery for an abdominal aortic aneurysm.

As Olena Shcherban, the family's lawyer, emphasised, despite his serious medical condition, Sentiabr Mahomedrasulov was effectively denied medical care while detained in the Kyiv SIZO. She argued that this was a means of exerting pressure on the NABU official[211]. In another interview, Ruslan Mahamedrasulov compared the methods used to obtain testimony against his father to those employed by the NKVD. According to him, another detainee was placed in his father's cell and, five days later, gave false testimony claiming that his father had confessed to selling hemp to the Russian Federation. "*He could not have sold it because we are accused of preparation. He simply expanded on the existing version and claimed that the sales had actually taken place*", Mahamedrasulov said.[212].

On 19 January 2026, the Pecherskyi District Court of Kyiv extended the pre-trial investigation in the Mahamedrasulovs' case by three months. The defence argued that the extension was unjustified and artificial. The lawyer noted that the case file contained fewer than ten witness interview records, all dating back to August 2025, and questioned why no further witnesses had been interviewed in the following months if such investigative steps had indeed been necessary.

On 23 January 2026, the Pecherskyi District Court of Kyiv replaced Sentiabr Mahomedrasulov's night-time house arrest with a personal recognisance obligation. Oleh Bilotserkivets, Investigating Judge, partially granted the motion, ordering him to appear when summoned by investigators and to notify them of any change of residence until 22 March 2026, inclusive[213]. The prosecution subsequently did not apply for an extension, and accordingly the preventive measure ceased to be in force from 23 March 2026 onward.

THE CASE OF DENYS HIULMAHOMEDOV

Denys Hiulmahomedov has served as First Deputy Director of NABU under Semen Kryvonos since 9 October 2024. He joined NABU as a detective when the Bureau was established in 2015. In 2016, he became head of one of the Bureau's detective units, which investigated corruption offences involving JSC Ukrzaliznytsia, the Rotterdam+ scheme, uncovered criminal organisations controlling shadow financial flows in Odesa, and investigated gas-related cases involving a former chair of the Verkhovna Rada Committee on Transport. In 2019, he helped develop the eCase Management System, an electronic criminal case management system, and took charge of that area in 2022. In 2023, he was appointed Deputy Director for Digital Development and Transformation at NABU[214].

During the night of 21 July 2025, amid a large-scale Russian attack, the wife of the senior NABU official was sheltering in a bomb shelter while he remained in their apartment. A few minutes after she returned home, several people in military uniform knocked at the door and were later identified as SSU officers. At around 5:45 a.m., they began a search. The search record listed three SSU officers and two attesting witnesses. However, the couple initially saw three or four armed servicemen accompanying the investigator, some of whom later left the building.

According to Hiulmahomedov, the investigator said that the search was urgent and related to an investigation into high treason, the supply of industrial hemp to the Russian Federation, Ruslan

211 "To SIZO Over the Mindich Case – The First Video with NABU Detective Mahamedrasulov", Anti-Corruption Action Centre YouTube channel, 12 December 2025: https://www.youtube.com/watch?v=uZyxbOtMOug&t=1798s

212 "How the System Shields Criminals. Mindich on the Radar. Russian Passport Held by His Father – Ruslan Mahamedrasulov", Radio NV, 19 December 2025: https://youtu.be/8NyF_D-gQIQ?t=2651

213 "Pecherskyi District Court Changes the Preventive Measure Imposed on Sentiabr Mahomedrasulov from Night-Time House Arrest to a Personal Recognisance", ZMINA, 23 January 2026: https://zmina.info/news/pecherskyj-sud-zminyv-sentyabru-magomedrasulovu-zapobizhnyj-zahid-z-nichnogo-domashnogo-areshtu-na-osobyste-zobovyazannya/

214 "Semen Kryvonos, Director of NABU, Appoints the First Deputy Director of the National Bureau", National Anti-Corruption Bureau of Ukraine, 9 October 2024: https://nabu.gov.ua/news/dyrektorom-nabu-semenom-kryvonosom-pryznacheno-pershogo-zastupnyka-dyrektora-natcional-nogo-biuro/

Mahamedrasulov, and several private companies. The couple said they did not understand why the search was considered "urgent", why it was being conducted at 5:45 a.m., or what exactly the SSU officers were looking for. Hiulmahomedov stated that the investigators' questions about documents and other items were so vague that there was nothing specific he could provide. He also told the investigator that he was unfamiliar with the private companies mentioned and that Mahamedrasulov was his subordinate.

In the absence of an investigating judge's warrant authorising the search under the CPC of Ukraine[215], Hiulmahomedov requested another procedural document explaining the need to conduct an urgent search before 6:00 a.m. (which, under the CPC of Ukraine, is prohibited except in urgent circumstances where delay could result in the loss of evidence of a criminal offence or the escape of a suspect, or under the conditions set out in Article 615 of the CPC of Ukraine)[216]. The investigator replied that no such document existed.

During the search, the investigator examined the son's laptop, the wife's mobile phone, the senior NABU official's laptop and mobile phone, USB flash drives, and other data storage devices. Hiulmahomedov unlocked his laptop and granted access for inspection, which, according to him, was carried out more thoroughly than the examination of the other devices. Although the investigator concluded that the laptop mainly contained documents related to academic work, he nevertheless decided to seize it for forensic examination. The investigator explained that he had found no work-related files on the device, even though the First Deputy Director of NABU had described it as a work laptop, and therefore assumed that such files might have been deleted. Hiulmahomedov argued that the seizure was unlawful because the investigator had no court authorisation to confiscate the equipment, the laptop contained no information relevant to the investigation, and, in his view, the investigator was not authorised to determine which files qualified as "work-related".

As a result of the initial inspection, Hiulmahomedov concluded that the decision to seize the electronic devices had been made in advance and therefore refused to provide the passwords to his computer and mobile phone. The senior NABU official told the investigator that the phone contained no information relating to the circumstances outlined at the beginning of the search, but that it might contain official Bureau data that could be of unlawful interest to SSU officers. For that reason, he refused to unlock the device or allow it to be examined. The investigator then decided to seize the mobile phone. Hiulmahomedov stated that the investigator recorded a different sequence of events in the search record, claiming that the decision to seize the laptop and phone had been made only after access to them had been refused. According to him, he described this manipulation in the annexes to the search record, setting out the actual sequence of events, which had also been captured on video.

The search ended at approximately 12:00 p.m. In the search record, Hiulmahomedov noted that he had filed a motion with the prosecutor and the investigating judge requesting that the search not be validated, arguing that it lacked both legal and factual grounds. However, he did not receive a response informing him of the outcome of his motion within the prescribed time limit.

Hiulmahomedov believes that the true purpose of the search was not to gather evidence in the criminal case but to exert pressure on him as one of NABU's senior officials while simultaneously discrediting the Bureau ahead of the rushed adoption of legislative amendments aimed at limiting its institutional independence. He also noted that, at the time of the mass searches, he was serving as Acting Director of NABU because the Director was on an official trip abroad. In his view, preventing him from carrying out his duties may have served an additional tactical purpose – further disrupting the institution's work on that day.

As one senior official from Ukraine's anti-corruption institutions told Ukrainska Pravda, the search of Hiulmahomedov in connection with the Mahamedrasulov case may have been prompted by their ethnic background, as both men are of Dagestani origin. In response to the outlet's request for the legal grounds for the search, the SSU stated that Hiulmahomedov "had contacts with FSB agent Fedir Khrystenko" and had "held informal clandestine meetings with Ruslan Mahamedrasulov, who is suspected of aiding the Russian Federation". In addition, unnamed SSU sources told the outlet that Fedir Khrystenko, a

215 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 234: https://zakon.rada.gov.ua/laws/show/4651-17#Text

216 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 223(4): https://zakon.rada.gov.ua/laws/show/4651-17#Text

fugitive Member of Parliament from the banned pro-Russian OPFL, had exerted influence over NABU through both officials. However, they provided no evidence to support this claim[217].

During a daytime meeting on a public street, Mahamedrasulov handed Hiulmahomedov a small "black bag". According to Ruslan Mahamedrasulov, the bag contained a shirt belonging to the Defence Intelligence of Ukraine, which Denys Hiulmahomedov took out after opening the boot of his car[218]. However, this moment does not appear in the surveillance record. He also noted that the meeting took place in a public location and involved no clandestine measures. Regarding Fedir Khrystenko, Hiulmahomedov said that he had previously interacted with him in his capacity as Deputy Chair of the Verkhovna Rada Temporary Investigative Commission on the assessment of the activities of JSC Ukrzaliznytsia and knew him as a sitting Member of Parliament. According to Hiulmahomedov, he had not been in contact with Khrystenko since around 2022, was unaware that he had allegedly been an "FSB agent", and had never received any official warnings from the SSU concerning him.

On 21 July 2025, Hiulmahomedov filed a motion with the prosecutor requesting a copy of the search warrant and, on 23 July 2025, submitted a motion to the investigator requesting a copy of the order authorising the seizure of his property. On 25 August 2025, he sent both motions to the Investigation Department of the Main Directorate of the SSU in Kyiv and the Kyiv region after receiving no response from the original recipients. He also lodged a complaint with the Prosecutor General regarding the investigators' and prosecutors' failure to consider his motions within a reasonable time. The complaint was referred to the Kyiv City Prosecutor's Office, which, on 5 September 2025, informed him that it had rejected the complaint. The response stated that the Pecherskyi District Court of Kyiv had authorised both the seizure of his property[219] and the search[220], but Hiulmahomedov had not been provided with copies of the relevant court rulings. Consequently, on 28 September, he applied to the Pecherskyi District Court seeking to have the seizure of his property lifted and requesting a copy of the court ruling.

Finally, on 3 October 2025 – two months after the search – Hiulmahomedov received from the Investigation Department of the Main Directorate of the SSU in Kyiv and the Kyiv region copies of the court rulings authorising the seizure of property removed during the searches, dated 25 July, and the search, dated 29 July 2025. According to Hiulmahomedov, the rulings contained no substantiation of his alleged involvement in the offence beyond a brief reference to SSU information stating that the premises contained items and documents recognised as material evidence in the Mahamedrasulovs' case.

The First Deputy Director of NABU later obtained, from the materials accompanying the prosecution's motion for a preventive measure against Ruslan Mahamedrasulov in the same criminal case under which his home had been searched, copies of letters issued by the DPNS of the SSU on 17 June 2025. According to Hiulmahomedov, the letters alleged that he had been involved in the offences attributed to Mahamedrasulov and referred to both men as "subjects of the criminal proceedings". In particular, they claimed that Hiulmahomedov had assisted in the sale of industrial hemp and justified the search on the grounds of locating the suspects and preventing the destruction of property. Hiulmahomedov considers these allegations to be an outright fabrication.

In October, Hiulmahomedov lodged a complaint with the Ukrainian Parliament Commissioner for Human Rights, filed a criminal complaint with the SBI alleging criminal offences committed by public officials, and submitted a complaint to the Head of the SSU requesting an investigation into alleged falsification in the criminal proceedings and the initiation of an internal investigation.

On 11 December 2025, Iryna Hryhorenko, an investigating judge of the Pecherskyi District Court of Kyiv, granted the complaint and lifted the seizure imposed on Hiulmahomedov's laptop and mobile phone with two SIM cards[221]. However, as of May 2026, the seized property had still not been returned to him.

217 "Summer Counteroffensive. What Evidence of Russian Influence over NABU Does the SSU Have?", Ukrainska Pravda, 6 August 2025: https://www.pravda.com.ua/articles/2025/08/06/7524969/

218 "New Secrets of the Mindich Tapes. Where Is the Notice of Suspicion for Yermak? Envelopes for MPs. Operation "Midas" Continues", Ye Pytannia YouTube channel, 17 December 2025: https://youtu.be/Qc1bC0vqZ5Q?t=1122

219 Ruling of the Pecherskyi District Court of 25 July 2025 in Case No. 757/34929/25-k

220 Ruling of the Pecherskyi District Court of 29 July 2025 in Case No. 757/35478/25-k

221 Ruling of the Pecherskyi District Court of 11 December 2025 in Case No. 757/47621/25-k

THE CASE OF YUSUF MAMESHEV

Yusuf Mameshev is one of the key witnesses in the case of Ruslan Mahamedrasulov, whose testimony contradicts the prosecution's account concerning the NABU official and his father, Sentiabr Mahomedrasulov. According to the NABU investigation, Mameshev is the person who spoke with the head of the detective unit about the sale of industrial hemp in the audio recordings released by the SSU, and he testified that the conversation concerned Uzbekistan rather than Dagestan. Mameshev also stated that NABU officers questioned him in a separate investigation into the alleged abuse of office by officials from certain law enforcement agencies during the searches of Bureau employees on 21 July 2025[222].

Yusuf Mameshev alleged that he and his son had been subjected to pressure by the SSU. According to him, SSU officers sent him threatening messages and arranged meetings during which they demanded that he change his testimony, warning him that he would face "problems" if he refused. He further claimed that, after refusing to alter his statement, he received a notification in the Reserve+ app later that same evening indicating that he had been placed on the wanted list[223].

The following day, on 10 September 2025, Mameshev was stopped by the police while driving his daughter to school. The officers informed him that he was on the wanted list and took him to undergo the MMC. According to Volodymyr Vasylchuk, the NABU detective who later interviewed him, Mameshev was in fact detained without proper legal grounds or any subsequent procedural formalisation, as evidenced by the police officers' body camera footage. In comments to Mirror of the week, Mameshev said that he had been *"pulled out of the car in front of my child without any explanation or even an introduction"*, after which he was taken for the MMC, his phone was confiscated, and he continued to be held despite having dangerously high blood pressure – 210/100. Mameshev also stated that he had never received a draft notice and suffered from health problems[224].

According to the defence, when Mameshev was taken to the TCR, a referral for the MMC was issued there. The referral remained registered in the system even though he had never signed a document acknowledging its receipt. Because he did not appear pursuant to that referral, Mameshev was fined. After obtaining a reservation from mobilisation, he independently generated a second referral through the Reserve+ app and underwent the MMC on the basis of that referral.

On 22 September, Mameshev reported receiving threatening messages from an unknown number[225]. His son, Mahomed Mameshev, also wrote on social media that their family had been threatened by the SSU. He confirmed that the conversation between Ruslan Mahamedrasulov and his father had concerned the sale of industrial hemp to Uzbekistan. After his father informed NABU of this, the Bureau passed his statement to the detained NABU official's lawyer, and it was agreed that it would be used in court. According to Mahomed Mameshev, a person who identified himself as an SSU officer later visited his father and implied that Yusuf and his son would face problems if they testified in favour of the Mahamedrasulovs, including threats that weapons or drugs could be planted on them.

On 15 and 17 October 2025, Mameshev testified before the Pecherskyi District Court of Kyiv, giving evidence that contradicted the prosecution's account in the case against Ruslan Mahamedrasulov. During the second hearing, he stated that after giving his testimony, he had received several summonses in criminal proceedings opened against him.

On 23 October 2025, the SBI and the SSU served Yusuf Mameshev with a notice of suspicion for "misleading the court by knowingly giving false testimony" regarding the content of his conversation with

222 "One of the Key Witnesses in the Case of NABU Detective Mahamedrasulov Is Receiving Threats", Ukrainska Pravda, 22 September 2025: https://www.pravda.com.ua/news/2025/09/22/7532015/

223 "Witness in the Case of NABU Detective Mahamedrasulov Served with a Notice of Suspicion for Allegedly Giving False Testimony – OPG", NV, 23 October 2025: https://nv.ua/ukr/ukraine/events/sprava-magamedrasulova-golovnogo-svidka-pidozryuyut-u-nadanni-nepravdivih-svidchen-50555060.html

224 "The SSU Serves a Notice of Suspicion on a Witness in the Case of NABU Detective Mahamedrasulov – Comment by Yusuf Mameshev, Suspected of Giving False Testimony", ZN.UA, 24 October 2025: https://zn.ua/ukr/POLITICS/sbu-oholosilo-pidozru-svidku-u-spravi-detektiva-nabu-mahomedrasulova-komentar-pidozrjuvanoho-u-nadanni-nepravdivikh-svidchen-jusufa-mamesheva.html

225 "One of the Key Witnesses in the Case of NABU Detective Mahamedrasulov Is Receiving Threats", Ukrainska Pravda, 22 September 2025: https://www.pravda.com.ua/news/2025/09/22/7532015/

Mahamedrasulov[226]. The OPG publicly announced the suspicion later that same day.[227].

Yusuf Mameshev testifying before the Pecherskyi District Court of Kyiv, October 2025. According to him, his conversation with Ruslan Mahamedrasulov concerned Uzbekistan.

Photo credit: Nikita Halka for Suspilne News

On 27 October 2025, Oleh Bilotserkivets, a judge of the Pecherskyi District Court of Kyiv, imposed a personal recognisance obligation on Yusuf Mameshev until 11 November 2025. He was also ordered to wear an electronic bracelet, not to leave Kyiv, and to surrender his international passport. Prosecutors justified these obligations by citing the risks that he might leave the country, destroy or distort evidence, or exert influence through acquaintances in law enforcement agencies. The defence objected to the use of an electronic bracelet, arguing that it would restrict his right to medical care, including access to certain examinations, and would affect his work and ability to support his large family. His lawyer stressed that the suspect had not evaded the investigation, had attended all questioning sessions and court hearings, and had cooperated with investigators.

The suspicion of giving false testimony was based on the fact that Mameshev was born in Dagestan and has relatives there – which, according to the prosecution, meant that he had discussed with Mahamedrasulov the sale of hemp specifically to Dagestan – as well as on the results of a psychological assessment which allegedly indicated a propensity to provide false information. Mameshev considers the suspicion unfounded and links it to the lack of real evidence against Mahamedrasulov. He maintains that he has had close business ties with Uzbekistan for more than ten years.

Yusuf Mameshev during the hearing on the imposition of a personal recognisance obligation at the Pecherskyi District Court of Kyiv, 27 October 2025.

Photo credit: Hanna Chekhovych for ZMINA

During a recess, Mahomed Mameshev showed journalists a message from an unknown sender advising him to "get your father out of the country" because a search of their home was allegedly being planned[228].

On 10 November 2025, the OPG submitted the indictment against Yusuf Mameshev to the court.

On 11 November 2025, Yuliia Holovko, a judge of the Pecherskyi District Court of Kyiv, granted the prosecution's motion and extended the previously imposed personal recognisance obligation until 9 January 2026. Prior to the hearing, the defence sought the judge's recusal, citing concerns about her impartiality. Following the automatic reassignment of the recusal motion, Anna Hrydasova, another judge of the same court, dismissed the application, and Holovko proceeded to extend the obligations[229].

226 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 384(1): https://zakon.rada.gov.ua/laws/show/2341-14#Text

227 "Witness in the Case Concerning Aiding the Aggressor State Served with a Notice of Suspicion for Knowingly Giving False Testimony", Office of the Prosecutor General, 23 October 2025: https://surl.li/gzydyl

228 "Court Imposes a Preventive Measure on a Witness in the Mahamedrasulov Case – Personal Recognisance Until 11 November", ZMINA, 27 October 2025: https://surl.li/zfwmhd

229 "Pecherskyi District Court Considers Prosecutors' Motion to Extend the Obligations Imposed on a Witness in the Mahamedrasulov Case", ZMINA, 11 November 2025: https://surl.li/xzzbvn

On 18 November 2025, Tetiana Ostapchuk, a judge of the Pecherskyi District Court of Kyiv, granted Judge Hrydasova's application for recusal. Hrydasova explained that she had previously issued a number of procedural decisions in Ruslan Mahamedrasulov's case and that, given the connection between the two cases, her involvement could give rise to doubts about her impartiality.

On 18 December 2025, Svitlana Hrechana, a judge of the Pecherskyi District Court of Kyiv, lifted the requirement for Yusuf Mameshev to wear an electronic bracelet. She extended his other procedural obligations for a further two months: he was prohibited from leaving Kyiv without the court's permission, required to notify the authorities of any change of residence or employment, and obliged to keep his travel documents with the relevant state authority.

During the hearing on the preventive measure, Prosecutor Viacheslav Kuzhel argued that the risks had not diminished, relying solely on references to individual pages of the case file without explaining their relevance. He asked the court to extend the least restrictive preventive measure and to keep the defendant's international passport in state custody. The judge pointed out that the obligation to appear before the investigator upon first request was no longer applicable because the pre-trial investigation had been completed.

Volodymyr Okhrimenko, defence lawyer, filed a counter-motion seeking the removal of the requirement to wear the electronic bracelet, submitting an X-ray examination confirming problems with Mameshev's feet and tendons. He noted that frequent power outages meant the bracelet could not always be recharged, resulting in repeated calls and visits to Mameshev's home by the monitoring service. Okhrimenko also stressed that, at this stage of the proceedings, his client was no longer in a position to influence the evidence. In response to the judge's questions, Mameshev explained that the bracelet made it difficult for him to walk and required him to regularly request that monitoring officers remove it during medical examinations.

On 22 December 2025, a panel of the Kyiv Court of Appeal, consisting of Judge-Rapporteur Marharyta Vasylieva and Judges Oleksandr Kyiashko and Liudmyla Kepkal, transferred Mameshev's case to the Shevchenkivskyi District Court of Kyiv after finding that the rules of territorial jurisdiction had been breached, as Mameshev had last given testimony within the Shevchenkivskyi district[230].

On 16 February 2026, the Pecherskyi District Court of Kyiv was scheduled to consider a motion by Viacheslav Kuzhel, OPG prosecutor, seeking an extension of the procedural obligations imposed on Mameshev. The defence sought the recusal of Oleh Bilotserkivets, Investigating Judge, citing concerns about his impartiality, but the application was dismissed.

On 17 February 2026, Bilotserkivets extended the procedural obligations imposed on Yusuf Mameshev for a further two months, until 16 April 2026. The prosecutor explained that the motion had been filed because the previous period was about to expire and the preparatory hearing before the Shevchenkivskyi District Court had been postponed following the transfer of jurisdiction. He relied on the risks that Mameshev might leave the country (given that he has close relatives and acquaintances abroad), destroy or distort evidence, influence expert witnesses, or use his connections within law enforcement agencies. The defence objected, arguing that none of these risks had been substantiated, that the pre-trial investigation had already been completed, and that Mameshev had complied with every summons. The defence also asked the court to allow him to travel within the Kyiv region, where his relatives live. As a result, the procedural obligations imposed on Mameshev at that stage were more restrictive than those imposed on Mahamedrasulov and his father: Mameshev was prohibited from leaving Kyiv, whereas they were free to travel[231].

Following the referral of the indictment to the court, the preparatory hearing in Mameshev's case was held on 25 February 2026 by Yevhen Martynov, President of the Shevchenkivskyi District Court of Kyiv. The prosecutor argued that there were no grounds for terminating the proceedings and asked the court to set the case down for trial. The defence, in turn, argued that the indictment did not correspond to the factual circumstances of the case, as the allegation of false testimony was based on another

230 "The Case of a Key Witness in the Mahamedrasulov Case Transferred to the Shevchenkivskyi District Court of Kyiv", ZMINA, 22 December 2025: https://surl.li/dffhat

231 "Court Extends the Obligations Imposed on a Witness in the Mahamedrasulov Case Until April", ZMINA, 17 February 2026: https://zmina.info/news/sud-prodovzhyv-obovyazky-svidka-u-spravi-magamedrasulova-do-kvitnya/

criminal proceeding in which no judgment had yet been delivered. According to the defence, this was contrary to the presumption of innocence and impeded the proper examination of the evidence.

The defence also asked the court to lift the restriction preventing Mameshev from leaving Kyiv and the Kyiv region and to order the disclosure of an extended extract from the URPI to enable the defence to prepare its legal position. He noted that the proceedings had initially been investigated by the SSU, that the SBI had subsequently served the notice of suspicion, and that the OPG was exercising procedural supervision. The prosecutor objected, arguing that the case materials had already been disclosed to the defence and that access to the URPI was restricted. The court dismissed all of the defence motions[232].

Preparatory hearing in Yusuf Mameshev's case at the Shevchenkivskyi District Court of Kyiv, 25 February 2026. Sentiabr Mahomedrasulov also attended the hearing.

Photo credit: Valeriia Naumenko for ZMINA

On 21 April 2026, the trial on the merits began. The court partially granted the prosecutor's motion to impose a personal recognisance obligation. In particular, Mameshev was ordered to appear before the court when summoned, notify the authorities of any change of residence or employment, and surrender his travel documents for safekeeping, while being permitted to leave Kyiv[233].

On 8 May 2026, the court examined four volumes of case materials, including a video recording of Mameshev's questioning and the expert reports. The defence pointed out that the linguistic expert opinion on the conversation between the witness and Ruslan Mahamedrasulov was inconclusive: the expert suggested that the word "Dagestan" might have been used but was unable to reach a definitive conclusion[234]. On 19 May, the court proceeded to examine the defence evidence and heard testimony from Mameshev. During the hearing, the defence submitted the latest version of the notice of suspicion served on Mahamedrasulov, arguing that the facts set out in it corresponded to the circumstances of Mameshev's case, in which he is a witness in the criminal proceedings against the NABU official[235].

Yevhen Martynov, judge, delivers the acquittal of Yusuf Mameshev, 20 May 2026.

Photo credit: Hanna Chekhovych for ZMINA

On 20 May 2026, the Shevchenkivskyi District Court of Kyiv acquitted Yusuf Mameshev, finding that the prosecution had failed to prove the elements of the criminal offence alleged against him[236]. The OPG announced that it would appeal the judgment, maintaining that the evidence gathered was sufficient to support the prosecution[237].

232 "Preparatory Hearing in the Case of Yusuf Mameshev, Witness in the Mahamedrasulov Case: Court Opens Proceedings, Defence Lawyer Challenges the Charges", ZMINA, 25 February 2026: https://surl.li/ddfncq

233 "Court Begins Hearing the Case of a Witness in the Mahamedrasulov Case and Imposes a Preventive Measure", ZMINA, 21 April 2026: https://zmina.info/news/sud-pochav-rozglyad-spravy-svidka-u-spravi-magamedrasulova-ta-obrav-jomu-zapobizhnyj-zahid/

234 "Court Begins Examining the Evidence in the Case of a Witness in the Mahamedrasulov Case", ZMINA, 8 May 2026: https://surl.li/jzjcpv

235 "Prosecutor Leaves the Hearing During the Final Stage of the Case of a Witness in the Mahamedrasulov Case", ZMINA, 19 May 2026: https://zmina.info/news/prokuror-zalyshyv-zasidannya-pid-chas-finalnogo-etapu-spravy-svidka-u-spravi-magamedrasulova/

236 "Key Witness in the Proceedings Against NABU Detective Mahamedrasulov Acquitted of Allegedly Giving False Testimony", ZMINA, 20 May 2026: https://surl.li/sqjskr

237 "Court Acquits the Key Witness in the Case of NABU Detective Mahamedrasulov. The Prosecution Will Appeal the Decision (Updated)", hromadske, 20 May 2026: https://surl.li/owupgj

THE CASE OF VOLODYMYR VASYLCHUK

Volodymyr Vasylchuk is a senior NABU detective conducting the pre-trial investigation in a consolidated criminal proceeding concerning law enforcement officials who allegedly obstructed the lawful activities of Bureau employees. The investigation is also examining alleged abuse of power by law enforcement officers and unlawful actions against Ruslan Mahamedrasulov. It was Vasylchuk who questioned Yusuf Mameshev, the witness who testified about the content of the conversation in the Mahamedrasulov case. According to the detective, the version that the conversation concerned Uzbekistan rather than Dagestan was confirmed through other investigative actions.

According to Vasylchuk, after the SSU became aware of the witness, it began putting pressure on him and threatening him, including through what he described as an unlawful attempt to conscript him into military service. After Mameshev told SSU officers that he would not change his truthful testimony, his Reserve+ app showed on 10 September 2025 that he had been placed on the wanted list. He informed the detective, who summoned him for questioning as a witness the following day in order to document the alleged unlawful pressure and consider whether witness protection measures should be applied.

Vasylchuk stated that the very next day Mameshev was unlawfully detained by police officers near the NABU headquarters, allegedly for a traffic offence, and taken for an MMC (see the section on Yusuf Mameshev above for further details). Mameshev telephoned the detective, asking for help and reporting ill-treatment, attempts to seize his phone, and the address to which he had been taken. Shortly afterwards, all contact with him was lost.

To establish the circumstances surrounding the incident involving the witness and ensure his safety, Vasylchuk went to the address Mameshev had provided. Both at the entrance and inside the building, he was refused any information about Mameshev's whereabouts. Suspecting that the witness might have been unlawfully abducted, the detective called the National Police and reported him missing. Vasylchuk later spotted the witness in the corridor leading to the MMC, where several men in military uniform were stationed at the entrance. The detective walked down the corridor to Mameshev, after which the door behind them was closed.

According to the detective, an air raid alert warning of a missile attack was sounded shortly afterwards. As there was no shelter at the location, he asked that everyone be allowed to move to a safe place, but the men in military uniform refused. Officers from the Solomianskyi District Police Department of the Main Directorate of the National Police, whom Vasylchuk had called, arrived shortly afterwards but also took no action, stating that the premises were not a military facility.

Vasylchuk attempted to pass through the closed door leading to the MMC corridor but was prevented from doing so. After the air raid alert ended, Mameshev's lawyer arrived, and the two of them left the premises together. Having given a statement to a police officer, the detective also left the scene and proceeded to question the witness.

Vasylchuk later learned that the Kyiv Regional Department of the SBI had opened criminal proceedings against the NABU detective in connection with the events that occurred during the MMC, alleging that he had obstructed the activities of the AFU and other military formations[238].

The detective directly links the SBI's actions to his investigation into criminal proceedings concerning law enforcement officials accused of obstructing the lawful activities of NABU employees. He believes these actions were intended to remove him from the investigation and to exert pressure on him and other Bureau employees by sending a clear message that anyone investigating the alleged unlawful actions of the SSU, the SBI, or the OPG could face similar consequences.

238 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 114-1(1): https://zakon.rada.gov.ua/laws/show/2341-14#Text

THE CASE OF VIKTOR HUSAROV

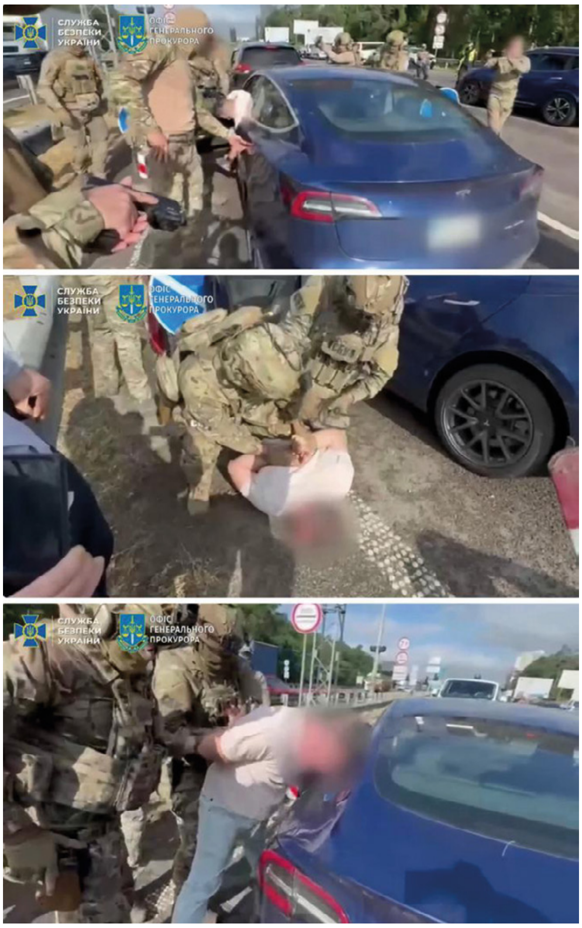
Viktor Husarov is a detective with the Second Main Special Detective Unit (D-2) who joined the National Bureau in 2016. On 21 July 2025, the SSU and the OPG served him with a notice of suspicion for high treason[239] and unauthorised handling of classified information[240], accusing him of spying for Russia's FSB.

In a later interview with NV, Husarov described his detention on 21 July 2025 as unnecessarily forceful. He and his wife were stopped at a checkpoint while returning to Kyiv from a trip outside the city. According to Husarov, officers struck their car, beat him, and restrained him with plastic handcuffs. He also said that the officers shouted that he was "a traitor" and claimed they were from the counterintelligence service and could do whatever they wanted[241].

His wife, Olena Husarova, said that the incident occurred at around 9:00 a.m., when approximately ten armed men in camouflage – who were later identified as SSU officers – ran up to the couple's car and pointed their weapons at them. Husarov was pulled from the vehicle, their mobile phones were seized, and the officers demanded the passwords to the devices. No search warrant was presented. According to Olena Husarova, it was only after being beaten that Husarov disclosed the passwords, before any investigator became involved[242].

According to Husarov's lawyer, Olena Storozhuk, he was struck in the face and on the body. The alleged violations during the detention and the presence of bodily injuries were recorded in the official report in the presence of attesting witnesses. The moment he was pulled from the vehicle was captured on video, and photographs of bruising to his face are also available (see Section 2.1 below)[243].

Olena Husarova's phone was initially seized but returned after the investigator had examined it. Following the search of the car, the detective was taken to the SSU, while his wife returned home, where other SSU officers were waiting to search the apartment. After the search, they seized her phone and all the cash found there. She told the officers that she had two young children, aged three and six, and needed money to care for them because she was not yet working. The SSU officers offered to leave her UAH 5,000. "*What struck me*", she recalled, "*was that they weren't making the decisions themselves – they were deciding everything over the phone*"[244].



The detention of Viktor Husarov at a checkpoint on the outskirts of Kyiv, 21 July 2025.

Screenshots from an SSU video published on the agency's YouTube channel the same day

239 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 111(1): https://zakon.rada.gov.ua/laws/show/2341-14#Text

240 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 362: https://zakon.rada.gov.ua/laws/show/2341-14#Text

241 ""You Are Constantly Under Pressure". A Covert NABU Detective Released from SIZO on the SSU's Treason Allegations, the Tymoshenko Case, and Mindichgate", NV, 25 January 2026: https://surl.li/oebbug

242 "Babel Follows the Case of Viktor Husarov, NABU Detective, Who Was Detained During the SSU's Summer Sweep of Anti-Corruption Institutions", Babel, 15 December 2025: https://surl.li/jrtvnp

243 "'High Treason' and Political Pressure: Everything Known About the Case of Viktor Husarov, NABU Detective, in an Interview with Olena Storozhuk, Lawyer", ZMINA, 5 December 2025: https://surl.li/vfzyyv

244 "Babel Follows the Case of Viktor Husarov, NABU Detective, Who Was Detained During the SSU's Summer Sweep of Anti-Corruption Institutions", Babel, 15 December 2025: https://surl.li/lpging

According to the defence, the seized cash was returned in late November 2025 after the freezing of the property had been successfully challenged in court. The Shevchenkivskyi District Court of Kyiv granted the defence motions, and its ruling was subsequently upheld by the Court of Appeal.

After Husarov was taken to the SSU headquarters in Kyiv, his personal data began to be made public, even though this information was classified and his affiliation with NABU constituted a state secret. He contrasted this with a search carried out in August 2024, during which an SSU officer had expressly warned him not to reveal his personal details on camera. According to the detective, those instructions were respected at the time, and the search itself was conducted quickly and without incident[245].

On 21 July 2025, the SSU and the OPG announced that they had detained an alleged FSB "mole" within NABU. The SSU stated that it had documented at least 60 instances in which Husarov had allegedly passed restricted information to Dmytro Ivantsov, the former deputy head of security for fugitive President Viktor Yanukovych, who had helped him flee to Russia in February 2014 and then remained in occupied Crimea, where he was allegedly recruited by the FSB. According to the investigation, Husarov collected identifying information on Ukrainian law enforcement officers and other individuals whom Russia was allegedly planning to target in terrorist attacks and special information operations. To obtain personal data, he allegedly used restricted law enforcement databases in Ukraine[246].

According to the investigation materials, the alleged agent received payments from his handler for passing information to Russia, with the money being transferred to his bank card. The SSU also stated that, during the detention, officers seized the suspect's mobile phone and computer equipment, which he allegedly used to communicate with Russian intelligence services. The SSU further claimed that it had informed NABU's leadership about the potential risks associated with the Bureau employee but that it had "*taken no action in response, allowing the suspect to remain in his position and subsequently attempt to destroy evidence of his unlawful activities*"[247].

Citing its own sources, Babel reported that Husarov had passed information concerning former SSU officers, members of the Defence Intelligence of Ukraine, and prominent businesspeople. However, the investigation materials, including a letter from the SSU Counterintelligence Department, refer to only five individuals whose information was allegedly disclosed in 2015, together with a warning that doing so could pose a threat to Ukraine's sovereignty. Olena Storozhuk, Husarov's lawyer, points out that this information was publicly available (including in the Myrotvorets database) and therefore could not have harmed Ukraine when allegedly passed to Ivantsov in 2015 or facilitated recruitment, as those individuals had already been working for Russia for more than a year at that time[248].

NABU responded that it had immediately acted on the information concerning Husarov received from the SSU leadership in August 2023 and, in particular, had conducted an additional review jointly with the SSU. According to information provided by the SSU, between 2012 and 2015 – while Husarov was serving in the Ministry of Internal Affairs of Ukraine (MIA), before joining NABU – he had emailed information about Ukrainian citizens to an employee of the Administration of State Guard of Ukraine (UDO). That UDO officer had held positions within the SSU until 2012 and, between 2012 and 2014, headed one of the Presidential Security Service units within the UDO. According to the SSU materials, following Russia's illegal annexation of Crimea, he defected to the aggressor state and, since 2020, has worked for the Federal Protective Service of the Russian Federation (FSO). The review found no evidence that Husarov knew about the UDO officer's links to Russian intelligence services, a conclusion that an SSU representative also confirmed during in-person meetings[249].

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245 ""You Are Constantly Under Pressure". A Covert NABU Detective Released from SIZO on the SSU's Treason Allegations, the Tymoshenko Case, and Mindichgate", NV, 25 January 2026: https://nv.ua/ukr/ukraine/politics/rozsliduvannya-nabu-timoshenko-mindichgeyt-energoatom-tagenprkouror-ruslan-kravchenko-50578095.html

246 "The SSU and the OPG Detain an FSB "Mole" Within NABU: He Was Handled by the Former Deputy Head of Yanukovych's Security Detail (Video)", Security Service of Ukraine, 21 July 2025: https://ssu.gov.ua/novyny/sbu-ta-ohp-zatrymaly-krota-fsb-u-lavakh-nabu-yoho-kuruvav-zastupnyk-kerivnyka-okhorony-yanukovycha-video

247 Ibidem

248 "Babel Follows the Case of Viktor Husarov, NABU Detective, Who Was Detained During the SSU's Summer Sweep of Anti-Corruption Institutions", Babel, 15 December 2025: https://babel.ua/texts/123689-babel-slidkuye-za-spravoyu-detektiva-viktora-gusarova-yakogo-zatrimali-vlitku-pid-chas-velikogo-turu-sbu-po-antikorupciynih-organah-os-shcho-pro-neji-vidomo-zi-sliv-usih-storin

249 "Regarding the SSU's Allegations of Possible Cooperation Between a NABU Employee and a Representative of the Russian Special Services", NABU Facebook page, 21 July 2025: https://www.facebook.com/share/1QfZbER8wH/

NABU further stated that, a year later, on 1 August 2024, the SSU searched the NABU employee's home and vehicle and summoned him for questioning in the high treason case involving the former UDO officer. Later that month, the SSU reportedly informed NABU orally that "*no facts indicating the NABU employee's involvement had been established, there was no evidence that he had been aware of the UDO officer's cooperation with the Russian Federation, and there was no evidence of his involvement in anti-state activities*". According to NABU, despite repeated requests for the official results of the review, the Bureau never received them[250].

Semen Kryvonos, Director of NABU also confirmed that the Bureau had reviewed the information received from the SSU but had found no conclusive evidence that the detective had been working for Russian intelligence services. He noted that the person to whom the information had allegedly been passed had not, at that time, been identified as a traitor. Kryvonos said he was surprised by the sudden arrest, arguing that it could have taken place as early as 2023, when the SSU first shared the information about the Bureau employee and investigative measures had already been carried out, including questioning the detective and subjecting him to a polygraph examination. Kryvonos also stated that publicly disclosing the names of criminal suspects before a court has delivered a conviction is an unacceptable practice and a direct violation of the law[251].

The SSU, however, maintained that the suspicions regarding Husarov's alleged cooperation with the FSB had not been disproved. In comments to Ukrainska Pravda, SSU representatives claimed that Husarov had lied during questioning about previously documented instances in which he had allegedly collected and passed information to the Russian intelligence service and had used countermeasures during the polygraph examination to interfere with the test. The newspaper also reported, citing its law enforcement sources, that the evidence underpinning the notice of suspicion against Husarov had been collected over a period of more than two years and that the investigation remains ongoing[252].

In a later interview, Olena Storozhuk described her client's case as an example of pressure on Ukraine's anti-corruption system and characterised the high treason suspicion as fabricated. She explained that the ARMOR system (Automated Workstation for Operational Officers), from which Husarov had allegedly obtained the information, contains only the MIA's technical records on individuals – such as wanted person alerts, administrative offences, and firearm ownership – and does not contain classified or intelligence information. She further argued that, even formally, the acts attributed to Husarov could amount at most to the unauthorised copying of information[253], an offence subject to a ten-year statute of limitations[254].

In his first interview following his detention, Husarov himself described the case against him as politically motivated and unfounded. The detective said that he had met Ivantsov in 2012 through a fellow graduate from the Special Operations Centre "A" of the Security Service of Ukraine (CSO "A" of the SSU), whom he trusted, and had provided him with database information as part of inter-agency cooperation, believing that Ivantsov was a law enforcement officer. It was only in August 2024, when the SSU first searched his home as part of the Ivantsov case, that Husarov learned that he had fled. According to the detective, he had previously been unaware of Ivantsov's connection to Yanukovych and had not been in contact with him for ten years[255].

On 8 September 2025, the SSU and the OPG disclosed new details of the case against the NABU detective, alleging that he had been part of a large Russian intelligence agent network. According to the investigation, the network included three other individuals in addition to the NABU employee,

250 Ibid.

251 "Semen Kryvonos, Director of NABU, on Defence Sector Investigations and Pressure on Detectives – BBC Interview", BBC News Ukrainian, 3 August 2025: https://www.bbc.com/ukrainian/articles/cvg48vn9vy0o

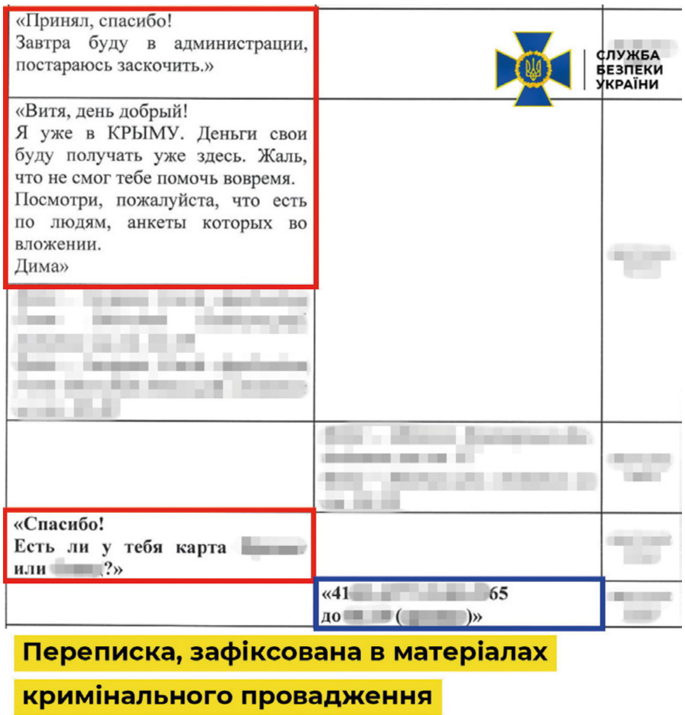
252 "Summer Counteroffensive. What Evidence of Russian Influence over NABU Does the SSU Have?", Ukrainska Pravda, 6 August 2025: https://www.pravda.com.ua/articles/2025/08/06/7524969/

253 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 362: https://zakon.rada.gov.ua/laws/show/2341-14#Text

254 "'High Treason' and Political Pressure: Everything Known About the Case of Viktor Husarov, NABU Detective, in an Interview with Olena Storozhuk, Lawyer", ZMINA, 5 December 2025: https://zmina.info/articles/derzhavna-zrada-ta-politychnyj-tysk-shho-vidomo-pro-spravu-detektyva-nabu-viktora-gusarova/

255 ""You Are Constantly Under Pressure". A Covert NABU Detective Released from SIZO on the SSU's Treason Allegations, the Tymoshenko Case, and Mindichgate", NV, 25 January 2026: https://nv.ua/ukr/ukraine/politics/rozsliduvannya-nabu-timoshenko-mindichgeyt-energoatom-tagenprkouror-ruslan-kravchenko-50578095.html

all of whom had been exposed earlier. They allegedly had access to state secrets and restricted documents, employed covert methods, and had been passing information to the FSB for many years[256].



«Принял, спасибо!
Завтра буду в администрации, постараюсь заскочить.»

«Витя, день добрый!
Я уже в КРЫМУ. Деньги свои буду получать уже здесь. Жаль, что не смог тебе помочь вовремя.
Посмотри, пожалуйста, что есть по людям, анкеты которых во вложении.
Дима»

«Спасибо!
Есть ли у тебя карта [illegible] или [illegible]?»

«41[illegible]65 до [illegible] ([illegible])»

Correspondence between Viktor Husarov and Dmytro Ivantsov published by the SSU on 8 September 2025.

Photo credit: Security Service of Ukraine

The SSU published what it said was correspondence between Viktor Husarov and Dmytro Ivantsov, who now works for the FSB and, according to the agency, coordinates the subversive activities of other Russian agents in Ukraine. According to the investigation, Husarov had been recruited as early as 2012 and continued passing information to Ivantsov after 2014, resuming their covert correspondence on the third day after the illegal referendum in Crimea[257].

NABU responded that the newly disclosed details concerning its employee "*relate to events that took place long before he joined NABU*" and that no information had been provided indicating any criminal conduct during his service with the Bureau. It added that it was awaiting all materials held by the SSU in response to its request and had also asked the SSU to question the employee as part of the Bureau's internal investigation, explaining that this was necessary to complete its review and make further administrative decisions[258].

Later, in November 2025, Mykhailo Tkach, investigative journalist, said that, according to his information, Husarov had received Ivantsov's message, "I'm already in Crimea", in 2012, before the UDO officer had defected to Russia and become a fugitive. However, the date is obscured in the correspondence published by the SSU. Semen Kryvonos confirmed that there was a discrepancy between the information presented in the SSU's public communications and the case materials examined as part of NABU's internal investigation[259].

During a meeting of the Parliamentary Committee on Anti-Corruption Policy on 25 November 2025, Andrii Shvets, Head of the SSU Main Investigative Department, stated that the pre-trial investigation into Husarov was ongoing and that investigators were examining specific facts that might indicate acts of high treason committed after 2015[260].

Viktor Husarov during the hearing on the application of pre-trial detention as a preventive measure, 22 July 2025. Beside him is his lawyer, Olena Storozhuk.

Photo credit: Oleksii Arunian for Suspilne News

256 "The SSU Releases New Details in the Case of the FSB "Mole" Within NABU (Video)", Security Service of Ukraine, 8 September 2025: https://surl.li/ooghga, "New Details in the Case Concerning Treason Allegations Against a NABU Official", OPG, 8 September 2025: https://surl.li/shqjfy

257 Ibid.

258 "In Response to the Security Service of Ukraine's Publication Regarding an Employee of the D-2 Unit, We State the Following", NABU Facebook page, 8 September 2025: https://www.facebook.com/share/1At7JZ8DAn/

259 "The Heads of NABU and SAPO on Mindich and Chernyshov | UP Chat", Ukrainska Pravda YouTube channel, 13 November 2025: https://www.youtube.com/watch?v=RCTC-vx4xNY&t=2525s

260 "Meeting of the Committee on Anti-Corruption Policy of 25 November 2025", Committee on Anti-Corruption Policy YouTube channel, 25 November 2025: https://youtu.be/H_58CC7BgjA?t=8603

In parallel, court proceedings concerning Husarov's pre-trial measure continued. On 22 July 2025, the Shevchenkivskyi District Court of Kyiv remanded the NABU detective in custody without the possibility of bail until 20 September 2025 or until the completion of the pre-trial investigation.

On 8 September 2025, the Kyiv Court of Appeal considered Husarov's appeal against his preventive measure and upheld his continued detention. The defence asked the court to replace detention with house arrest or, alternatively, to set bail. Husarov's lawyer argued that the first-instance court had unjustifiably ordered his detention because he had cooperated with the investigation, had repeatedly provided statements, and had not attempted to evade the authorities. The prosecutor, by contrast, insisted that detention should continue, citing the risk of flight or obstruction of the investigation, and further suggested that Husarov might still possess devices that investigators had not discovered and could destroy evidence.

During the appeal hearing, Prosecutor Ruslan Izhuk stated that, while serving in the MIA, the suspect had access to ARMOR – the ministry's internal database containing operational information on individuals. According to the investigation, Husarov obtained information from this database and passed it to Ivantsov on 60 occasions between 2012 and 2015.

The prosecutor further argued that Husarov knew Ivantsov was in occupied Crimea but nevertheless continued sending him information from ARMOR until 2015.

Olena Storozhuk confirmed that her client had known Ivantsov and had passed him information from ARMOR, including in 2015. However, she disputed the basis for the high treason suspicion, arguing that Husarov had been unaware that Ivantsov had fled to Crimea and was cooperating with the FSB, believing instead that he was still serving with the UDO. According to Storozhuk, the SSU had opened criminal proceedings against Husarov as early as 2019.

During the hearing, the defence also asked the court to re-examine Husarov's supervisor at NABU, who had previously testified that, following the reviews conducted in 2024, the SSU had not informed the Bureau of any suspected involvement by the detective in cooperation with Russia. However, the panel of judges, chaired by Viacheslav Hul, dismissed the motion[261].

Viktor Husarov's lawyers, Olena Storozhuk (left) and Inna Pyrohovska (right), during the hearing of the appeal against the preventive measure before the Kyiv Court of Appeal, 8 September 2025.
Photo credit: Suspilne News

On 16 October 2025, Oleksii Hlian, a judge of the Shevchenkivskyi District Court of Kyiv, extended Husarov's detention for a further 60 days without the possibility of bail. The defence argued that the suspicion was unfounded, maintaining that the correspondence had taken place between two law enforcement officers, as Ivantsov was serving with the UDO at the time of their communications. The lawyers further argued that the case materials, gathered more than ten years earlier, had revealed no indications of high treason until July 2025. They also pointed out that, in 2024, the SSU had reaffirmed Husarov's security clearance despite being aware of his contacts with Ivantsov.[262].

On 27 November 2025, a panel of the Kyiv Court of Appeal, consisting of Judge-Rapporteur Viacheslav Hul and Judges Yaroslav Melnyk and Yuliia Matviienko, dismissed the defence appeal and upheld the detective's detention. The defence sought the recusal of the panel, arguing that it had disregarded the defence's submissions in several appeals and that the prosecution had repeatedly relied on the same evidence when seeking both the initial and subsequent extensions of the preventive measure. According to the defence, the hearing originally scheduled for 23 October 2025 had been postponed by more than a month, even though the appeal should have been considered within three days. The court dismissed the application for recusal.

261 "Court of Appeal Leaves NABU Employee Husarov in Custody", Suspilne News, 8 September 2025: https://suspilne.media/amp/1109864-apelacijnij-sud-zalisiv-pid-vartou-pracivnika-nabu-gusarova/

262 "Court Leaves NABU Detective Husarov in Custody", Anti-Corruption Action Centre Telegram channel, 16 October 2025: https://t.me/fuckcorruption/4506

During the appeal proceedings, the defence argued that the investigating judge had provided no evidence to substantiate the risks justifying continued detention and that, according to the ECtHR's case law, a failure to explain why alternative preventive measures, including bail, could not be applied constitutes a violation of Article 5 of the European Convention on Human Rights. The defence further noted that the evidence in Husarov's high treason case included a copy of the notice of suspicion served on Dmytro Ivantsov on 10 January 2024, which concerned unauthorised abandonment of a military unit[263] rather than high treason. The lawyers argued that the correspondence with Ivantsov contained information about individuals obtained from the ARMOR database that did not constitute state secrets and that its contents could not be identified without access to the email account itself. They also maintained that access to private correspondence required authorisation from an investigating judge, which had not been obtained. Furthermore, in their view, the only evidence relied upon by the investigation – a forensic semantic and textual expert opinion dated 26 September 2025 – was questionable because it contained legal conclusions that fall within the competence of the investigator or the court.

During the hearing, Viktor Husarov argued that the prosecution had produced no evidence of high treason or grounds justifying his continued detention. He stated that, since 2024, he had cooperated with the investigation, voluntarily undergone a polygraph examination, provided full access to his electronic devices, appeared whenever summoned by investigators, had not gone into hiding, and had continued working. The detective added that he had never received the results of the polygraph examinations conducted in 2024–2025 and described the case as an example of political pressure. Owing to the classified nature of his work, he said he could not disclose details of his involvement in specific NABU operations but noted that he had been one of the Bureau's leading analysts and could have made a significant contribution in the current political context. The prosecutor, for his part, maintained that the risks remained, arguing that the case concerned a particularly serious offence, that the investigation possessed a larger body of evidence than the defence, and that the suspect's professional experience could hinder the investigation, including by facilitating his possible absconding[264].

The Kyiv Court of Appeal upheld Viktor Husarov's detention, 27 November 2025.

Photo credit: Hanna Chekhovych for ZMINA

On 5 December 2025, Oleksii Hlian, a judge of the Shevchenkivskyi District Court of Kyiv, refused to change Viktor Husarov's preventive measure. Olena Storozhuk, his lawyer, said she had applied to the court three times to ensure that the detective received medical care, but that the rulings had been only partially enforced: in particular, a blood test was taken shortly before the hearing. She linked this to the changed political context. The defence asked the court to replace detention with night-time house arrest or a personal recognisance obligation. In the lawyers' view, the risks of absconding, destroying evidence, or influencing witnesses had been set out in purely formal terms, while the investigation had obtained no new information. The prosecutor, however, argued that the requests were well-founded and linked the risks to the high treason suspicion.

During the hearing, the defence once again argued that Husarov's actions did not constitute a criminal offence and that the evidence relied on a message referring to Crimea and an inspection record of a

263 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 408: https://zakon.rada.gov.ua/laws/show/2341-14#Text

264 "Court of Appeal Leaves Viktor Husarov, NABU Detective, in Custody", ZMINA, 27 November 2025: https://zmina.info/news/apelyaczijnyj-sud-zalyshyv-pid-vartoyu-detektyva-nabu-viktora-gusarova/

2014 Ukrainska Pravda[265] online article about Yanukovych's flight from Ukraine, which, according to the prosecution, allegedly demonstrated Husarov's awareness that Ivantsov had fled the country together with the former president. According to the defence, the detective learned of this only during the searches conducted on the basis of the same materials. At that time, Husarov proposed luring Ivantsov back and detaining him, but the SSU showed no interest.

On 9 December 2025, the Shevchenkivskyi District Court of Kyiv postponed the hearing on the prosecutor's motion to extend Viktor Husarov's detention because of a deterioration in his health. At the start of the hearing, his lawyer requested that he undergo a medical examination. The detective himself confirmed that he was experiencing dizziness and was unable to read. In response, Volodymyr Buhil, the presiding judge, declared a technical adjournment to allow Husarov to receive medical assistance and undergo an examination.

During the adjournment, the detective said that his blood pressure had risen sharply the previous day, leaving him unable to read the investigator's motion. His lawyer explained that she had informed the court in advance that she would be away on a business trip, yet the motion had been served on her client in her absence. She added that, until the previous week, he had received no medical care despite repeatedly complaining of high blood pressure, making the court hearing effectively his only opportunity to obtain treatment. According to Storozhuk, the court had shifted responsibility to the Kyiv SIZO, while the facility itself maintained that it was unable to provide the necessary medical care. Olena Husarova, the detective's wife, also described the emotional pressure caused by repeated refusals to allow her to visit her husband. She said she had submitted four requests for a visit but had received replies to only two of them, both stating that such a visit could prejudice the investigation.

After the hearing resumed, the court secretary reported that the medical service had found no contraindications to the suspect's participation. The defence insisted that the hearing should be adjourned, arguing that the examination had been too brief and that no documentation confirming the medical care provided had been submitted. The prosecutor did not object to an adjournment if the suspect was unwell. Husarov, however, told the court that he could barely hear the judge and was therefore unable to properly follow the proceedings.

Viktor Husarov at the Shevchenkivskyi District Court of Kyiv, 9 December 2025. The NABU detective looks towards his wife, who has been denied permission to visit him. On the left is his lawyer, Olena Storozhuk.

Photo credit: Valeriia Naumenko for ZMINA

On 10 December 2025, the Shevchenkivskyi District Court of Kyiv resumed the hearing on changing Viktor Husarov's preventive measure. Volodymyr Buhil, the presiding judge, granted the prosecutor's motion and placed the detective under round-the-clock house arrest until 21 January 2026. Husarov was also ordered to appear before investigators upon first request, not to leave the Kyiv region, and to refrain from contacting witnesses.

During the hearing, the prosecutor argued that Husarov's detention had been justified because investigators had been examining his possible involvement in a network linked to Dmytro Ivantsov, as well as assessing his connections and the associated risks. At the same time, the prosecutor acknowledged that Ivantsov himself had not been served with a notice of suspicion for high treason due to insufficient evidence, despite the investigation possessing certain relevant information. He stated that the need for the most restrictive preventive measure had now diminished because the investigation had completed the necessary inquiries and new circumstances had emerged in the proceedings. The prosecutor also drew attention to the deterioration of the NABU detective's health. The defence sought either night-time house arrest or a personal recognisance obligation. Husarov's lawyer argued that even house arrest could deprive him of access

265 "Yanukovych Flew to Kharkiv", Ukrainska Pravda, 21 February 2014: https://www.pravda.com.ua/news/2014/02/21/7015619/

to medical care. She also informed the court that Husarov's child required surgery and that round-the-clock house arrest would place the entire burden of care on his wife[266].

Viktor and Olena Husarov after the NABU detective's preventive measure was changed from detention to round-the-clock house arrest. Shevchenkivskyi District Court of Kyiv, 10 December 2025.

Photo credit: Hanna Chekhovych for ZMINA

Describing the detective's conditions of detention at the Kyiv SIZO, his lawyer said that he had been held in a single-occupancy cell under constant video surveillance and that only an operative officer had access to the cell. "*If the operative officer is not there, Viktor has no way of getting anyone's attention. There is no light switch in the cell – the lights are on all the time. When he was placed there in July, there was not even any glass in the window – there was a constant draught. It was only installed sometime in September. The cell was dirty and infested with cockroaches. He cleaned everything himself, got rid of the cockroaches, and we sent him cleaning supplies. Those are the conditions there. As for basic necessities, whatever his wife brings him is all he has*", the lawyer explained[267].

On 12 January 2026, the Shevchenkivskyi District Court of Kyiv considered the prosecutor's motion to extend the pre-trial investigation in Husarov's case by two months. The defence objected, arguing that the investigation had already had sufficient time, that no new evidence had emerged and the legal classification of the case had not changed, and that the prosecutor was seeking an additional two months merely to carry out routine investigative steps. The prosecutor replied that the investigation was in its final stage. Investigating Judge Pavlo Slobodianiuk partially granted the motion, extending the pre-trial investigation by one month – until 21 February 2026.

On 13 January 2026, the Kyiv Court of Appeal partially granted the defence's motion, changing Viktor Husarov's preventive measure to night-time house arrest (from 11:00 p.m. to 5:00 a.m.) until 21 January 2026[268]. On 19 January, the Shevchenkivskyi District Court of Kyiv extended the measure until 21 February 2026 and relaxed some of the obligations imposed on him, allowing him to travel within the Kyiv region, stay at Points of Invincibility when necessary, and leave his place of residence during an air raid alert or to obtain medical assistance if required[269].

On 18 February 2026, the Shevchenkivskyi District Court of Kyiv extended the pre-trial investigation in Husarov's case by one month. The investigator merely referred to the motions already submitted and did not provide detailed reasoning. Judge Olena Mielieshchak sought clarification regarding the grounds for extending the investigation and granted the motion, noting that the difficult situation affecting Ukraine's energy system could hamper the work of investigators.

On the same day, the court extended the night-time house arrest until 21 March 2026. Prosecutor Ruslan Izhuk had initially sought a two-month extension of the measure but proposed reducing it to one month to correspond with the extended period of the pre-trial investigation. He argued that, given the risks involved, this was the least restrictive preventive measure available. The defence maintained that the preventive measure was disproportionate at this stage of the proceedings because all the evidence

266 "Court Changes the Preventive Measure Imposed on Viktor Husarov, NABU Detective, to Round-the-Clock House Arrest", ZMINA, 10 December 2025: https://zmina.info/news/sud-zminyv-zapobizhnyj-zahid-detektyvu-nabu-viktoru-gusarovu-na-czilodobovyj-domashnij-aresht/

267 "'High Treason' and Political Pressure: Everything Known About the Case of Viktor Husarov, NABU Detective, in an Interview with Olena Storozhuk, Lawyer", ZMINA, 5 December 2025: https://zmina.info/articles/derzhavna-zrada-ta-politychnyj-tysk-shho-vidomo-pro-spravu-detektyva-nabu-viktora-gusarova/

268 "Court of Appeal Changes the Preventive Measure Imposed on Viktor Husarov, NABU Detective, to Night-Time House Arrest", ZMINA, 13 January 2026: https://zmina.info/news/apelyaczijnyj-sud-zminyv-zapobizhnyj-zahid-detektyvu-nabu-viktoru-gusarovu-na-nichnyj-domashnij-aresht/

269 "Court Extends the Night-Time House Arrest of NABU Detective Husarov Until 21 February, but Allows Him to Stay at Invincibility Centres", ZMINA, 19 January 2026: https://zmina.info/news/sud-prodovzhyv-nichnyj-domashnij-aresht-detektyvu-nabu-gusarovu-do-21-lyutogo-ale-dozvolyv-perebuvaty-u-punktah-nezlamnosti/

had already been collected. It also pointed out that Husarov had complied with every summons from the investigators and had returned to performing his official duties at NABU.

In February, the internal investigation into Husarov was completed and found no grounds for holding him liable.

On 12 March 2026, the criminal proceedings against Viktor Husarov on suspicion of high treason were closed due to insufficient evidence of his involvement. The pre-trial investigation period and the preventive measure, both due to expire on 21 March 2026, were not extended and effectively ceased following the submission to the court of a motion seeking Husarov's exemption from criminal liability in relation to the episode concerning unauthorised actions involving classified information on the grounds that the statutory limitation period had expired.

ALLEGATIONS OF CONCEALING RUSSIAN CITIZENSHIP BY CLOSE RELATIVES OF NABU EMPLOYEES

On 22 July 2025, during a joint briefing, Ruslan Kravchenko, Prosecutor General, and Vasyl Maliuk, then Head of the SSU, addressed the media. Maliuk stated that seven NABU employees had failed to disclose that their parents held Russian citizenship when applying for security clearance. In addition to Ruslan Mahamedrasulov, he said that the SSU had conducted investigative actions in relation to six other employees over these circumstances, although none had been served with notices of suspicion for offences against national security. According to Maliuk, these circumstances could be regarded as instances of concealment. He also claimed that there were "*a number of other compromising indicators and certain questions concerning them*"[270].

In August, in response to a media enquiry from Ukrainska Pravda, the SSU confirmed that it had carried out investigative actions concerning Kostiantyn Polkin, Eduard Smirnov, Oleksandr Usov, and Oleksii Diadenko in connection with their alleged failure to disclose that close relatives held Russian citizenship. The SSU stated that, following a review conducted "*as part of efforts to counter the harmful influence of the Russian Federation on state institutions*", the employees concerned had been stripped of their security clearance[271]. Although they were not mentioned in the response, similar allegations were also made against NABU employees Ivan Kravchuk, Yurii Tsvietkov, and Vitalii Tiebiekin.

During a meeting of the Parliamentary Committee on Anti-Corruption Policy on 25 November 2025, Oleh Holovash, Chief of Staff to the Head of the SSU, stated that, as part of cooperation between the SSU and NABU, polygraph examinations had been initiated for nine NABU employees who had allegedly provided incomplete or inaccurate information when applying for security clearance. At that time, the security clearances of three Bureau employees had already been reinstated, while the review remained ongoing[272].

Notably, the NABU employees whose homes were searched over the alleged "concealment of Russian citizenship of relatives" were all linked to the same criminal case (No. 22025101110000774 of 2 July 2025), which may indicate that the actions formed part of a coordinated campaign of persecution.

On 21 July 2025, SSU officers searched the home of **Kostiantyn Polkin**, Head of a Detective Unit within NABU's Second Main Special Detective Unit – the same D-2 unit in which Viktor Husarov served 0– while relatives were visiting his house in the town of Vyshneve, Kyiv region, which inaddition to Polkin, his wife, and their three daughters, was occupied by his wife's sister, her husband,their three sons,and his mother-in-law.

270 "Searches at NABU! Scandal over Law No. 12414! Vasyl Maliuk and Ruslan Kravchenko Answer Questions! Full Version", TSN YouTube channel, 22 July 2025: https://youtu.be/xHvAeQZEUb4?t=1174

271 "Summer Counteroffensive. What Evidence of Russian Influence over NABU Does the SSU Have?", Ukrainska Pravda, 6 August 2025 https://www.pravda.com.ua/articles/2025/08/06/7524969/

272 "Meeting of the Committee on Anti-Corruption Policy of 25 November 2025", Committee on Anti-Corruption Policy YouTube channel, 25 November 2025: https://youtu.be/H_58CC7BgjA?t=7528

According to Polkin, the family was awakened at around 5:30 a.m. by the intercom ringing, loud shouting, and banging on the gate. Looking out of a second-floor window, they saw a group of people in military uniform outside the property demanding that the gate and front door be opened. The head of the detective unit said that when his wife went into the yard and opened the gate, armed SSU officers took her mobile phone. As Polkin was coming downstairs, armed men in military uniform burst into the house, shouting that they were from the SSU.

The subsequent search record nevertheless stated that he and his wife had surrendered their phones voluntarily. In light of these circumstances, Polkin concluded that the primary purpose of the search, conducted without prior judicial authorisation, was to gain access to the private correspondence stored on his mobile phone and to other information it contained. In particular, the device held information about individuals cooperating with NABU and ongoing Bureau operations.

During the search, which began after he refused to provide access to his phone, the investigator did not inform Polkin of his rights or invite him to surrender the requested items voluntarily. According to Polkin, he asked approximately five times to be allowed to contact his lawyer and to ensure the lawyer's presence during the search, but each request was refused, which he considers a violation of his right to a defence.

Polkin said that there were 11 men inside the house, most of them wearing full military gear and carrying weapons in a combat-ready condition. However, the investigator later recorded only himself and two other SSU officers in the search record. According to the NABU official, none of those present, apart from the investigator, identified themselves. Polkin noted that the law enforcement officers were spread across both floors of the house, making it impossible for either him or the attesting witnesses to monitor their actions.

Mobile phones and tablets were seized from all family members and guests present in the house.

Without providing any explanation, the investigator decided to seize the mobile phones belonging to Polkin, his wife, his wife's sister, her husband, their nine-year-old son, and his mother-in-law.

Kostiantyn Polkin stated that the officers seized NABU-owned electronic equipment, two SIM card trays, one SIM card, and two memory cards. One of the memory cards contained a single open file with the text of an interview record, which constituted confidential pre-trial investigation material. After reviewing it, the SSU officer immediately decided to seize the memory card, which Polkin believes confirms that the purpose was to obtain NABU's official information.

The officers also seized his wife's laptop, which the children used for schoolwork and watching videos, his wife's sister's laptop, which was used for everyday household purposes, and documents relating to an apartment in the city of Luhansk owned by his wife's sister's family, where they had lived before the occupation.

At the end of the search, the Head of the NABU detective unit was served with three summonses to appear for questioning as a witness. The investigator later informed his lawyers that he did not need to appear in response to those summonses, and no further investigative actions involving Polkin have been carried out since then.

On 27 July 2025, Kostiantyn Polkin and his lawyer sought to participate in the hearing before the Pecherskyi District Court of Kyiv on the prosecution's motion to retrospectively authorise the search. According to the NABU official, however, they received only a formal reply on 6 August and were not allowed to attend the hearing. Nor were they provided with the ruling retrospectively authorising the search, which had been issued by Investigating Judge Serhii Vovk. On 3 September, they applied to the Pecherskyi District Court of Kyiv for a copy of that ruling, but this request likewise received neither a response nor consideration.

Polkin did not receive any summonses to attend court hearings concerning the seizure of his property, nor was he provided with the relevant court rulings. On 25 July 2025, his lawyers also submitted a motion to the prosecution and the investigation seeking the return of the temporarily seized property, but it was never considered. A lawyer's request of 20 August 2025 seeking information on the status of that motion likewise remained unanswered.

On 6 October 2025, Kostiantyn Polkin and his lawyer filed a motion with the Pecherskyi District Court of Kyiv seeking the lifting of the seizure of his property. Despite the applicable procedural time limits, Polkin did not receive the relevant ruling until 5 November 2025. In his absence, the investigating judge ordered that the motion be returned to the applicant, citing a lack of territorial jurisdiction. The judge reasoned that the SSU Main Directorate in the City of Kyiv and Kyiv region, the pre-trial investigation authority, was located in Solomianskyi District of Kyiv and that the defence should therefore apply there[273]. Polkin considers this a serious violation of his right to challenge unlawful actions before a court, since it was the Pecherskyi District Court that had ordered the seizure of the property taken during the urgent search in its ruling of 25 July 2025[274]. At that time, however, the investigating judge had found no issue with territorial jurisdiction when considering the investigator's motion.

In late November, the NABU official filed a motion with the Solomianskyi District Court of Kyiv seeking the lifting of the seizure of his property. The hearing was postponed several times at the prosecutor's request. On 30 April 2026, following appellate review, the seizure order was lifted[275]. However, as of May 2026, the seized property had still not been returned.

In November 2025, Kostiantyn Polkin's security clearance was reinstated.

On 21 July 2025, SSU officers searched the rented apartment in Kyiv of **Oleksii Diadenko**, Senior NABU Detective. He was awakened at around 5:30 a.m. by loud banging on the door. Also present in the apartment was Yuliia Zaria, with whom he lives. As he approached the entrance, he heard demands to open the door, followed immediately by an order to break it down. After opening the door, the detective saw three men armed with assault rifles, dressed in tactical military uniforms and balaclavas, as well as several others in civilian clothing. According to Diadenko, two or three of the men rushed into the apartment. Shouting that they were from the SSU, they ordered him to lie on the floor. Diadenko said that he raised his hands and clasped them behind his head, but the officers forced him face down onto the floor from behind, twisted his arms behind his back, and pinned down his legs with their knees. One of them shouted, asking where his phone was, and the detective replied that it was in the bedroom. Yuliia Zaria, who was in that room, handed over the detective's phone. According to Zaria, she wanted to leave the room, but an armed law enforcement officer signalled for her to remain where she was.

The phone was briefly unlocked when Face ID recognised the detective's face after it was held in front of him, but it locked again shortly afterwards. The officers then demanded that he disclose the passcode. "*I either did not respond or asked, "Why do you need the passcode?" (I do not remember exactly)", Diadenko recalled, continuing his account of the events. "Then one of the men in uniform began pressing a knee or a hand into my lower back, around my right kidney, while forcing my right arm even further behind my back and shouting threateningly, "What's the passcode?" I said, "Why do you need the passcode?" and "Guys, what are you doing?! Why are you twisting my arm like this?" One of them replied, "No one's twisting your arm", and pressed down on me even harder. After some time, because of the pain they were causing me, I gave them the passcode, and one of those present unlocked the phone*". He was then helped to his feet while the officers continued holding both of his arms. One of the men he noticed was wearing a jacket marked "SSU Counterintelligence", while several others were dressed in civilian clothing.

Diadenko described the use of force before the search as humiliating. In his view, the circumstances did not justify such measures, as he had offered no resistance. He believes that the purpose was to exert psychological pressure on him in order to gain access to the information stored on his phone. At the same time, he understood these actions as part of broader pressure being exerted on NABU as an institution. Diadenko did not seek medical assistance or request a forensic medical examination because he had sustained no visible physical injuries.

Oleksandr Novak, investigator with the SSU Investigation Directorate in the City of Kyiv and Kyiv region, called Yuliia Zaria into the room, after which, at his instruction, the camera was switched on. At 5:40 a.m., he announced the start of an urgent search for the purpose of securing property in criminal

273 Ruling of the Pecherskyi District Court of 13 October 2025 in Case No. 757/49170/25-к

274 Ruling of the Pecherskyi District Court of 25 July 2025 in Case No. 757/25181/25-к

275 Ruling of the Kyiv Court of Appeal in Case No. 757/35181/25-к / Unified State Register of Court Decisions, 30 April 2026: https://reyestr.court.gov.ua/Review/136327086

proceedings opened on 2 July 2024 concerning the “commission of high treason by unidentified persons”[276]. He did not specify what property was to be secured. In addition to the investigator, the search was conducted in the presence of two male attesting witnesses, two SSU officers, and two or three armed men in military uniform who did not identify themselves.

The investigator asked whether there were any documents in the apartment connected with the Russian Federation and whether Diadenko communicated with anyone in the TOT of Ukraine or in Russia. Diadenko denied possessing any such documents and said that he remained in contact with his parents, who lived in a village in the Kherson region that had been under occupation since February 2022; occasionally with his sister, who had lived in Crimea since 2004; and with his daughter, who currently lives in Russia with his former wife. The detective then asked whether such communication itself constituted high treason. The investigator suggested that he might have passed on certain information, including official information. Diadenko insisted that he had never shared any information and had not even told his relatives about his work at NABU in order to minimise the risk of persecution by the Russian security services, which he believed could arise because of his previous service in law enforcement, including the prosecutor’s office and the police.

Diadenko believes there was no need to seize his phone because, during the search, it was unlocked and available for a full examination or copying of its contents. The investigator also decided to seize Yuliia Zaria’s phone, arguing that she communicated with individuals who used Russian telephone numbers. The detective explained that she was in contact with her father, who lived in the temporarily occupied part of the Kherson region, as well as with her mother and aunt, who were temporarily residing in the Russian Federation. He also believes that all of the correspondence could have been examined during the search. The officers additionally seized an old phone belonging to the detective, which he had not used for more than a year, because they found a contact with a Russian phone number stored on the device.

At the investigator’s request, Diadenko voluntarily handed over two laptops, which he had recently used for watching films and which were not protected by any security system. One of them contained materials relating to criminal proceedings from his previous work at the Kherson region Prosecutor’s Office, including cases involving high treason and collaboration in the TOT. The other laptop had been used for several years by Yuliia Zaria’s thirteen-year-old daughter for online schooling and contained no official documents. The investigator decided to seize both laptops. At the time of the search, the child was staying with a friend in another part of the city, a fact that Diadenko and Zaria informed the officers about. Given that Russia had launched missile and drone attacks on Kyiv that morning, they were left without any means of contacting her.

The phones contained work-related messaging groups, access to which created a risk of disclosing official information, including information relating to ongoing investigations. During the search, the detective drew the officers’ attention to this and asked them to delete the chats, but the investigator replied that this information was of no interest to them. The seized devices also contained numerous family and personal photographs, including pictures of relatives whom they had not seen for more than five years. According to Diadenko, losing these photographs was emotionally difficult for them. In addition, they incurred financial costs because they had to purchase replacement devices.

The investigator stated that the search was being conducted in connection with criminal proceedings concerning high treason but was unable to explain the substance of the alleged offence or how Diadenko was connected to it, other than through his communication with people living in the TOT and in the Russian Federation. One of the operational officers said that SSU personnel had learned about the planned large-scale searches several days in advance, that it had been impossible to obtain such a large number of court warrants in time, and that they feared information might be leaked if they applied to the court. During the conversation, one of the law enforcement officers also acknowledged that they themselves disliked inter-agency conflicts. According to Diadenko, this led him to conclude that the search was more likely connected with pressure on NABU than with an objective investigation.

Oleksii Diadenko is convinced that his parents could only have obtained Russian passports under coercion. They are elderly and unable to leave the occupied territory. For his part, he avoids discussing

276 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 111(2): https://zakon.rada.gov.ua/laws/show/2341-14#Text

Russian identity documents with them. The detective said that he was deeply troubled by the situation because he had previously supervised investigations into collaboration and high treason and was concerned that the Russian security services might take an interest in his relatives who remained in the TOT.

Diadenko described the search of his home as humiliating. He explained that, during the first two months of the full-scale invasion while living in the TOT, he had feared that Russian military personnel or security services might search his home because he had served in various law enforcement agencies from 2004 until February 2022. Instead, after relocating to government-controlled Ukraine and obtaining internally displaced person status together with Yuliia Zaria, he was subjected to what he considers unauthorised and unlawful searches carried out under the guise of investigating high treason. According to Diadenko, this caused him significant emotional distress and left him feeling unprotected by the law.

The search also damaged the reputation of Diadenko and the family with whom he lives in the eyes of their neighbours, as the early morning operation was accompanied by shouting and loud banging on the door.

Later that day, while at work, the detective learned from a notification sent by the SSU that his security clearance had been revoked on 20 July 2025 because his mother, who lives in the TOT, had allegedly held Russian citizenship since 2023. He was accused of failing to disclose this fact in the security clearance questionnaire he had submitted in July 2024. Diadenko pointed out that SSU officers could have established this fact as early as 2024 and returned the questionnaire to him for correction. At the time, however, they had raised no questions, whereas in July 2025 the same issue became the basis for conducting the urgent search. According to Diadenko, the revocation of his clearance to work with classified documents restricted his ability to perform his official duties and also caused him financial losses because the corresponding allowances were withdrawn. In December 2025, the detective's security clearance was reinstated.

Between July and September 2025, Oleksii Diadenko and his lawyer submitted a number of motions to the Pecherskyi District Court of Kyiv and to the investigator seeking access to case materials and participation in proceedings concerning the retrospective authorisation of the search, the seizure of property, and the return of temporarily seized items. In practice, however, Diadenko was unable to participate in the hearings, and some of the motions remained unanswered.

Diadenko later obtained a ruling of 29 July 2025 ordering the seizure of property, which had been issued without his participation or proper notification. The ruling stated that all the seized electronic devices belonged to him, even though some of the property belonged to Yuliia Zaria. He was not provided with a copy of the ruling.

On 17 November 2025, he received Investigating Judge Roman Novak's ruling authorising the search[277], together with a separate ruling correcting a clerical error, as the original ruling contained an incorrect criminal case number[278]. The motion for the search was considered in a rather formal manner: the ruling merely stated that the seized items had been recognised as material evidence. The detective pointed out that no account had been taken of the relevant circumstances, including the fact that the devices had either been unlocked or were not protected by any security system.

On 4 September 2025, following a report Diadenko submitted to the NABU Director, information concerning the alleged abuse of authority by SSU officers was entered into the URPI. The proceedings were subsequently merged with criminal proceedings opened on 23 July 2025, which combined other cases initiated on the basis of complaints by NABU employees whose homes had been subjected to urgent searches.

In October 2025, Oleksii Diadenko and his lawyer filed a motion with the Pecherskyi District Court of Kyiv seeking the return of the seized property, but no hearing was scheduled. The hearing before the Kyiv

277 Ruling of the Pecherskyi District Court of Kyiv of 28 July 2025 in Case No. 757/35196/25-k

278 Ruling of the Pecherskyi District Court of Kyiv [on Correcting a Clerical Error in the Investigating Judge's Ruling] of 28 July 2025 in Case No. 757/35196/25-k

Court of Appeal on the appeal against the seizure order, lodged in November–December, was postponed because the case materials had not been provided. After considering the appeal, the court dismissed it. The lawyer intends to file a further motion seeking the lifting of the seizure order.

On 21 July 2025, searches were carried out at two addresses linked to **Oleksandr Usov**, a NABU detective: the apartment from which he, his wife, and their daughter had already moved out (where the door was forced open), and the apartment where they were living at the time of the searches. When the search began at 7:45 a.m. at the second address, only his daughter, a sixth-year student at Taras Shevchenko National University of Kyiv, was present. According to Usov, she was not informed of the nature of the allegations or the purpose of the search. He said that approximately ten SSU special forces officers wearing military uniforms, balaclavas, and carrying assault rifles initially entered the apartment. After they had inspected the premises, the investigator, five SSU officers, and two attesting witnesses entered, while the special forces officers left and remained outside the entrance door.

When his daughter asked why the officers had entered the apartment, the investigator replied that criminal proceedings concerning high treason had been opened on 2 July 2025, without explaining who was suspected of committing the offence. The SSU officers seized all electronic devices found in the apartment at the time: her personal mobile phone, the detective's laptop, and his wife's tablet.

Usov stated that, on the day before the search, 20 July 2025, the SSU revoked his security clearance. It was reinstated in October 2025.

No search was conducted at the apartment of **Eduard Smirnov**, an officer of NABU's Operational and Technical Directorate. However, on 21 July 2025, officers forced open the entrance door shared by several apartments. Smirnov filed a complaint with the National Police regarding the damage to the property. In November 2025, his security clearance was reinstated.

On 21 July 2025, during a large-scale Russian missile and drone attack on Kyiv, **Ivan Kravchuk**, Head of a NABU detective unit, and his wife were sheltering in the corridor of their apartment. At around 5:30 a.m., they were awakened by noise outside the apartment, and a few minutes later there was a knock at the door from individuals who subsequently identified themselves as SSU officers.

According to the NABU official, after he opened the door, he was pulled by the arm into the corridor, the left side of his face was slammed against the wall, he was pinned against it face first, and his hands were secured behind his back with plastic zip ties. Kravchuk noted that law enforcement officers should not use such restraints instead of handcuffs because plastic zip ties cannot be loosened, which may lead, among other things, to impaired blood circulation and soft tissue injuries. He was convinced that a misunderstanding had occurred and that the SSU officers had come to the wrong address.

Ivan Kravchuk stressed that he had done nothing to obstruct the SSU officers. According to him, he remained restrained with the plastic zip ties for approximately 15 minutes, during which he experienced pain. The NABU official repeatedly asked the officers to release his hands, assuring them that he would not resist. He established that he had not been detained. Eventually, on the instructions of Oleksandr Maiboroda, the investigator in charge of the search, one of the SSU officers cut the plastic zip ties with a knife and released his hands.

At the time, approximately five to eight armed men in military uniform were inside the apartment, some of them wearing balaclavas. According to Kravchuk, the SSU officers referred several times to "Alpha" while speaking among themselves, leading him to believe that they were members of the CSO "A" of the SSU. Two attesting witnesses, both elderly women, later entered the apartment. Kravchuk considered this inappropriate in light of the provisions of the Criminal Procedure Code of Ukraine, which require a personal search to be conducted by persons of the same sex[279], as such searches may involve partial or complete undressing. According to him, he was almost completely undressed at the time and was only able to get dressed after his hands had been released from the plastic zip ties. After entering the apartment, the SSU officers requested the presence of a representative of the Kyiv Region Bar Council because the NABU official's wife, Antonina Kravchuk, is a practising lawyer. The representative arrived approximately 20–30 minutes later. According to those present during the search, the Bar Council had been notified on Sunday, 20 July 2025.

279 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 236(5): https://zakon.rada.gov.ua/laws/show/4651-17#Text

According to Antonina Kravchuk, an SSU officer wearing a balaclava used physical force against her. He grabbed her by the wrist, forcibly snatched the phone from her hands, and held it up to her face, causing it to unlock. "*I felt a sharp pain in my arm, and the pain continued throughout the entire search. When I verbally pointed out that the SSU officer in the balaclava was hurting me, he did not react in any way*", she said.

When the NABU official asked about the reason for the search and whether there was a court warrant, the SSU officers replied that it was an urgent search related to high treason[280]. However, when he asked them to specify the factual basis of the alleged offence, they gave no answer. The investigator asked whether he had any relatives in the occupied territories or in the Russian Federation and whether he corresponded with anyone in Russia. Kravchuk denied this. "*From our conversation, it became clear that the purpose of the search was not to obtain evidence of my involvement in any crime, but rather to exert pressure on me and on the institution where I work, and to obtain information constituting the secrecy of the pre-trial investigation to which I have access*", the Head of the NABU detective unit explained. Having reached this conclusion, he decided not to disclose the passwords to devices protected by security systems. Later, according to Kravchuk, the investigator told him that searches were also being carried out at the homes of his colleagues and, apparently boasting about it, showed him photographs and videos from Telegram channels depicting SSU officers detaining Ruslan Mahamedrasulov.

Ivan Kravchuk noted that, by the time the search began, his phone was already in the possession of the SSU officers but was locked, apparently because the facial recognition system had attempted to authenticate someone else. The NABU official's wife offered to unlock her own phone so that the officers could copy the data and examine its contents. In particular, she suggested that they search her contacts for Russian phone numbers and check whether there was any correspondence with them. Antonina Kravchuk explained that she had the contact details of her maternal aunt saved under "Godmother", with whom she had had no contact since the start of Russia's full-scale invasion of Ukraine because the aunt supported the aggressor. (In the search record, however, the investigator recorded the contact as "Godmother Russia", although this was not how it was saved.) She also had a distant relative saved as "Orenburg", a native of Lviv who supports Ukraine, with whom they occasionally exchanged holiday greetings. Despite this, the investigator, raising his voice, decided to seize her phone.

Ivan Kravchuk noted that the SSU officers behaved in a rude manner: they sat on the furniture without permission and generally acted as though they were in charge, asserting their dominance. His wife objected to their behaviour, which led to several verbal altercations. The NABU official believes that, after the search had begun, the CSO "A" officers left the apartment, leaving only operational officers wearing balaclavas inside. In his view, they concealed their faces because they intended to commit unlawful acts during the search and wanted to prevent themselves from being identified.

Kravchuk noticed that, after gaining access to his wife's phone, the SSU officers were carrying out covert investigative actions, which under Ukrainian law require prior judicial authorisation. He is convinced that they did not possess the necessary court orders. In his view, this amounted to interference with private communications in violation of the Constitution of Ukraine. Moreover, the phone may have contained information protected by legal professional privilege. His wife said that the device stored thousands of photographs of their children taken over the previous ten years, which were of great sentimental value as family memories, and that she was deeply upset by the loss of access to them.

The head of the detective unit also had his mobile phone, personal laptop, and work laptop seized. Ivan Kravchuk considers the greatest risk to be the possibility of his phone being unlocked and its contents accessed, including information relating to criminal proceedings involving individuals who were under pre-trial investigation, which could have enabled them to be warned and facilitated the destruction of material evidence.

Only after the search did Kravchuk learn that investigative measures in the criminal proceedings opened on 2 July 2025 had been carried out not only against him but also against NABU detectives and heads of units who had close relatives in the occupied territories or relatives holding Russian citizenship. He

280 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 111(2): https://zakon.rada.gov.ua/laws/show/2341-14#Text

believes that the operation was intended to obtain sensitive information from cases involving senior public officials, which could later be disseminated through dubious Telegram channels and presented as leaks from criminal proceedings. Kravchuk maintained that neither he nor his relatives had any contact with representatives of the Russian security services.

In the NABU official's view, searches in cases of this nature should be based on evidence indicating possible communications with representatives of the Russian security services and the transfer of sensitive information to them. He said that, from the very first days of the full-scale invasion, he joined NABU's consolidated operational combat unit, was issued a weapon, and took part in the defence of Ukraine and in protecting the population and the interests of the state.

Ivan Kravchuk said that his father had acquired Russian citizenship in the 1990s while working in the Russian Federation. Because he had not disclosed this information, the SSU revoked his security clearance, even though he had previously undergone security vetting in 2013 and 2019 without any objections. According to the head of the detective unit, the loss of his security clearance significantly restricted his work and also resulted in the loss of the corresponding salary allowance. His security clearance was reinstated in October 2025.

Kravchuk said that he was unable to undergo a medical examination immediately to document the injuries he had sustained. On 21 July 2025, he was turned away at Kyiv City Hospital No. 4: the admissions department cited a lack of the necessary forms and referred him to the trauma unit, where he was told that craniofacial injuries did not fall within the department's remit. The following day, he went to Kyiv City Clinical Hospital No. 12. Although the soft tissue bruise was no longer as pronounced and red as it had been the previous day, it remained clearly visible.

The doctor on duty examined Kravchuk, diagnosed a soft tissue contusion to the left cheekbone area, and notified the police that he had sustained bodily injuries allegedly inflicted by SSU officers. Kravchuk was recognised as a victim in criminal proceedings opened on 21 July 2025, with the pre-trial investigation being conducted by investigators of the SBI. According to the NABU official, he was questioned in August or possibly even September. In September, he submitted a motion to the SBI requesting that a number of investigative actions be carried out. At the end of September 2025, he underwent a forensic medical examination; however, by that time, two months after the incident, no visible traces of the injuries remained. No one has been held criminally liable in those proceedings.

Ivan Kravchuk believes that he and his colleagues involved in the proceedings were hindered in their access to justice. In particular, they were not informed of the composition of the investigative team (it later emerged that, in addition to SSU investigators, it also included investigators from the SBI), and they initially applied to the Solomianskyi District Court of Kyiv. They learned only through media reports – specifically, news coverage of the pre-trial detention hearings involving their colleagues – that the motions were in fact being considered by the Pecherskyi District Court of Kyiv. He and his wife therefore filed a motion seeking to participate in the court's consideration of the search, but their requests were refused on 6 August 2025.

According to Ivan Kravchuk, it was only after two months of submitting numerous motions and complaints – seeking authorisation of the search, the return of the seized property, and a copy of the investigating judge's ruling – that he finally received the search warrant. According to the head of the detective unit, neither that ruling nor the ruling authorising the seizure of property explained the purpose of the search or how he was allegedly connected to the offence. Instead, the investigating judge simply granted the prosecutor's motion and authorised the seizure of the electronic devices.

On 29 August 2025, Kravchuk received a copy of the ruling issued on 29 July 2025 by Investigating Judge Roman Novak of the Pecherskyi District Court of Kyiv concerning the seizure of property and reviewed the case materials. The prosecutor's motion alleged that certain NABU employees maintained ties with relatives living in the aggressor state or the TOT and had deliberately failed to disclose this information in official documents. However, Kravchuk argues that the elements of the alleged offence are absent and that the stated facts are untrue, as his father permanently resides in territory under the control of Ukraine and stopped travelling to Russia more than 20 years ago.

He further noted that the prosecutor had provided no evidence demonstrating intent, deliberate concealment of information, or any actions that could be classified as high treason.

Neither Kravchuk nor his wife was notified of the hearing on the motion seeking the seizure of the confiscated electronic devices. One day before the hearing, the investigating judge gave the investigator a summons to notify the head of the unit, who sent it to his registered address rather than his actual place of residence, and it never reached the registered address either. Prosecutor Serhii Pavlyk filed a motion requesting that the matter be considered in his absence. Given the absence of the elements of any offence and the speed with which the hearing was conducted, Ivan Kravchuk is convinced that the court's decision had been predetermined.

The NABU official stated that he had spent considerable time submitting motions to the SSU, the SBI, the OPG, and the Pecherskyi District Court of Kyiv to obtain information about the progress of the pre-trial investigation and the whereabouts of the seized items. However, in most cases, he was denied access to justice and the case materials to which he should have had access to without having to seek judicial review. Consideration of his motions took several months, unless the judges returned them or left them without consideration.

On 23 December 2025, the Kyiv Court of Appeal overturned the ruling of the Investigating Judge of the Pecherskyi District Court of Kyiv imposing the seizure of property[281]. In February 2026, the seized data storage devices were returned to Kravchuk.

On the night of 21 July 2025, at approximately 2:30 a.m., due to a Russian missile attack, **Yurii Tsvietkov**, Senior Detective and Lieutenant Colonel of NABU, went down to the underground car park of the apartment building where he lived and sat in the driver's seat of his parked car. According to him, at around 5:30 a.m., while he was asleep inside the vehicle, three unidentified men armed with pistols and wearing camouflage uniforms bearing SSU insignia and balaclavas entered the car and used physical force against him: they grabbed his clothing, arms, and hair, and forcibly pulled him out of the vehicle into the car park. He stated that they then continued to beat him: "*They held both of my arms and my hair, pressed my face against a reinforced concrete pillar in the car park (…) and kicked me in the legs. In this way, they forced my legs apart 'wider than shoulder-width' and immediately, while standing on both sides of me and behind me, began striking all parts of my body with their hands and feet*". According to Tsvietkov, they struck him in the face, head, and abdomen with open hands and fists, and kicked him in the groin while demanding that he reveal the location of his phone.

The detective noted that the use of force against him was partially captured by the car park's CCTV cameras, but the most critical part of the assault was not recorded. As Tsvietkov explained, the assailants had first walked around the car park to identify the locations of the CCTV cameras and their fields of view, before dragging him into a blind spot behind a pillar, where they assaulted him.

After receiving around ten blows, Yurii Tsvietkov disclosed where his phone was located inside the car, after which one of the men retrieved it. When the assailants demanded the device's passcode and he refused to provide it, all three again began striking him with their hands and feet all over his body. They said they would continue beating him until they obtained the passcode. One of the SSU officers threatened that if he refused to reveal the access code, they would take him to the SIZO, and that an "accident" would supposedly occur on the way, preventing him from ever arriving there. "*Almost immediately after those words, one of the above-mentioned attackers struck me twice with great force – first with his fist, from above, on the crown of my head, and then with his fist to the right side of my ribs. As a result, I experienced unbearable pain and dizziness, could no longer remain standing, and fell onto the concrete floor of the car park. I did not completely lose consciousness, but I was in a state of severe disorientation*", the detective added.

After Tsvietkov fell to the ground, one of the assailants began stamping on the bare foot of his left leg with the sole of his military boot (his shoes had come off at the beginning of the attack). The detective eventually disclosed his phone's passcode because, as he explained, he understood that the SSU officers would not stop beating him, he was experiencing severe physical pain, and he perceived their threats as

281 Ruling of the Kyiv Court of Appeal in Case No. 757/35178/25 / Unified State Register of Court Decisions, 23 December 2025: https://reyestr.court.gov.ua/Review/133357305

posing a real danger to his life and health. After the phone was unlocked, they stopped beating him, and Tsvietkov got back to his feet.

Yurii Tsvietkov believes that he was unlawfully deprived of his liberty and that the use of physical force against him was in no way prompted by his conduct, as he was unarmed and offered no resistance. According to him, he was subjected to torture in order to force him to disclose his phone's passcode. These actions by the law enforcement officers were not properly documented: no detention report was drawn up, and these circumstances were not recorded in the search record or any other procedural document – which, in the detective's view, also demonstrates their unlawfulness.

One of the SSU officers entered the detective's car and took a waist bag and a leather backpack from it. He inspected their contents, returned the backpack to the detective, but kept the waist bag, placing the phone inside it. He then carried the bag containing the detective's phone to the apartment.

One of the men told Tsvietkov that a search of his apartment was about to be conducted and that an SSU investigator and attesting witnesses were already waiting there to begin the investigative (search) actions. One of the SSU officers then pushed him in the back towards the exit from the car park and ordered him to accompany them to the apartment. According to Tsvietkov, he complied with their instructions because he understood that they posed a threat to his life and health. "*While walking from the car park to the apartment, I stopped from time to time, and each time I stopped, one of the three attackers pushed me in the back, forcing me to continue walking with them and in the direction they indicated*", Tsvietkov said.

According to the detective, at around 5:50 a.m., they entered his apartment, where his wife and five unidentified men were present, two of whom were also wearing camouflage uniforms, balaclavas, and patches bearing SSU insignia. The detective later learned from his wife that at around 5:30 a.m., six SSU officers and two attesting witnesses had forced their way into the apartment and asked where her husband was. She told them that he was in his car in the car park, after which three of them went there while the others remained in the apartment. An investigator from the Investigative Department of the Main Directorate of the SSU in Kyiv and Kyiv region and two other men, who turned out to be the attesting witnesses, identified themselves. The other five men in camouflage uniforms and balaclavas, including the three attackers from the car park, refused to provide their details to the investigator, stating only that they were all SSU officers.

Vadym Melnyk, investigator, informed Tsvietkov that an urgent search would be conducted at his apartment as part of a criminal investigation opened on 2 July 2025 concerning a suspicion of high treason[282]. He stated that the grounds for conducting the search were the need to preserve property but did not explain what property was concerned or why it needed to be preserved. According to the investigator, the proceedings concerned, among other things, allegations that Tsvietkov had knowingly provided false information regarding the absence of RF citizenship among his close relatives in the questionnaire he completed in 2023 to reinstate his security clearance.

The detective stated that, on the same grounds, the SSU revoked his security clearance. According to him, the SSU notification dated 20 July 2025 alleged that Tsvietkov had failed to disclose that his brother held a Russian passport, which, according to the SSU, he had obtained in 2019. The detective maintained that, when he left the occupied part of the Luhansk region in 2014, he knew with certainty that his brother was a Ukrainian citizen and was living in the Luhansk region together with their parents – the last place of residence of his close relatives known to him.

Tsvietkov stated that he had not maintained regular personal contact with his brother since February 2022 but had been compelled to communicate with him periodically regarding the health of their elderly parents, which had deteriorated since 2021 – both had effectively lost the ability to move independently. He also stated that, after submitting the questionnaire, he received a phone call from an SSU employee to verify the information it contained. According to Tsvietkov, he informed her of these circumstances, after which his security clearance was reinstated in 2023. It should be noted that the reinstatement of his security clearance resulted from the expiry of his previous clearance and was a standard procedure. Overall, he held a security clearance from 1999 until July 2025. On this occasion, Tsvietkov's security clearance was reinstated in December 2025.

282 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 111(2): https://zakon.rada.gov.ua/laws/show/2341-14#Text

The detective provided the investigator with the passcode to his phone, which one of the SSU officers had earlier placed on a shelf in the hallway of his apartment. He maintains that his phone had in fact been seized by SSU officers in the car park during the unlawful inspection and search of both his person and his vehicle. Tsvietkov noted that this was never officially documented, as it took place in the absence of attesting witnesses, without the use of technical recording equipment, without the relevant rulings of an investigating judge, and without any record being drawn up.

As a result of the search, the detective's phone with its SIM card, as well as an old laptop and its charger, were seized. According to Tsvietkov, the seized phone contained information related to his professional activities, including information about individuals with whom he had cooperated confidentially. In his view, access to such information by unauthorised persons and its possible disclosure create, at a minimum, obstacles to his professional activities and, at worst, a direct threat to other individuals and potentially even to their lives and health.

At the same time, the phone contained his personal information accumulated over the course of his life, including photographs, videos, and audio recordings from his birthplace, which is now under occupation, as well as materials relating to his parents, who have lived in the occupied territory since 2014. He regarded the loss of this information, which was of great personal significance to him, as a personal tragedy. The search record was drawn up by the investigator after the search of the apartment had been completed. Yurii Tsvietkov did not raise any comments or additions with the investigator because he feared that the SSU officers who had beaten him and remained in the apartment during the search might carry out their threats.

Due to the bodily injuries he had sustained and his need for medical assistance, the detective first sought treatment from the medical unit of NABU and then from Kyiv City Clinical Hospital No. 4. There, a doctor examined him and diagnosed "abrasions to the inner surface of the left cheek, the area of the ninth and tenth ribs on the right side, and the upper part of the left foot", after which treatment recommendations were provided. In addition, on 21 July 2025, he filed a report with the Solomianskyi Police Department concerning the criminal offence committed against him, which was registered the same day. After waiting for a long time at the police department, he was given a referral for a forensic medical examination only after the Kyiv City Clinical Bureau of Forensic Medical Examinations had closed for the day, so he was able to undergo the examination only on the following day. The forensic expert documented multiple bruises and prepared the corresponding forensic report.

The police report was later added to the materials of the criminal proceedings opened on 21 July 2025, on suspicion of abuse of power or official authority by a law enforcement officer[283]. The pre-trial investigation is being conducted by investigators of the Main Investigative Department of the SBI. On 19 August 2025, by a resolution of a senior investigator for particularly important cases of the Main Investigative Department of the SBI, Yurii Tsvietkov was recognised as a victim in those criminal proceedings. In the investigator's view, the offence of abuse of power or official authority by a law enforcement officer encompasses all the crimes allegedly committed against Tsvietkov that day by SSU officers, including the unlawful use of physical force and unlawful deprivation of liberty.

According to Tsvietkov, the investigation made no progress during the four months following these events: the necessary evidence was not collected, and the individuals who had used force against him were not identified. In December 2025, he received a request from the SBI to provide the original medical records for a forensic medical examination. At that time, those documents were being examined as part of an expert examination ordered by NABU. The documents were returned to Tsvietkov in March, after which he decided to submit them to the SBI. The expert examination conducted within the NABU proceedings confirmed that he had sustained minor bodily injuries.

The detective stated that, as a result of the bodily injuries he sustained, his physical and psychological condition deteriorated sharply. According to him, during the first two days, the effects of adrenaline prevented him from feeling any significant deterioration, although he ate almost nothing. On 23 July 2025, he developed trembling in his hands, recurrent nausea, an aversion to food, dizziness, headaches, memory impairment, and skin rashes. Tsvietkov consulted specialist doctors and underwent the prescribed treatment, but his condition had still not returned to normal by November. He also stated that

283 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 365(2): https://zakon.rada.gov.ua/laws/show/2341-14#Text

he had incurred medical expenses, suffered material damage as a result of the seizure of his electronic devices, and sustained non-pecuniary damage.

On 23 July 2025, Tsvietkov filed a motion with the Pecherskyi District Court of Kyiv seeking to participate in the hearing on the prosecution's motion for retrospective authorisation of the search of his apartment, which had already been conducted without a court ruling. He later learned that, on 28 July 2025, Investigating Judge Roman Novak of the Pecherskyi District Court of Kyiv, in his absence and without notifying or summoning him to the hearing, had considered and granted the prosecution's motion. He received a copy of the ruling authorising the search of his apartment, together with a copy of the ruling correcting a clerical error in it, only on 4 October 2025 by post.

On 25 August 2025, Yurii Tsvietkov submitted a motion to SSU investigators Vadym Melnyk and Volodymyr Spilnyi seeking the return of temporarily seized property. The reply, dated 18 September 2025, stated that it was impossible to return the seized property. The detective noted that, according to the inspection record of his laptop, SSU officers had not found any information relevant to the pre-trial investigation.

In September 2025, Tsvietkov filed complaints with the Pecherskyi District Court of Kyiv concerning the failure of SSU investigators to provide the video recording of the search of his apartment and to return the property seized during the search. His first complaint was returned, while the second was dismissed.

Tsvietkov states that he was entirely unaware of the hearing concerning the seizure of property or the date on which the relevant ruling was to be delivered. After receiving a copy of the ruling, he appealed it. On 13 October 2025, the detective filed an appeal with the Kyiv Court of Appeal. The hearing was adjourned twice in October because the case file from the court of first instance had not yet been received by the appellate court. According to the ruling of the Kyiv Court of Appeal of 10 December 2025, the appeal was dismissed[284].

On 17 October 2025, Yurii Tsvietkov filed a motion with the Pecherskyi District Court of Kyiv seeking to lift the seizure of property, but on 27 November Investigating Judge Yevhen Khainatskyi dismissed the motion. On the same day, he appealed to the Kyiv Court of Appeal seeking the lifting of the seizure of property, and on 12 January 2026, he submitted a motion to the SSU seeking the return of temporarily seized property. The detective's property was not returned.

The searches conducted on 21 July 2025 at the home of **Vitalii Tiebiekin**, Deputy Head of a NABU detective unit, were also linked to the fact that his close relatives lived in the TOT and held Russian passports. Journalists from Ukrainska Pravda noted that, as early as the summer of 2024, the NABU official had informed the Internal Control Department of NABU and the SSU about attempts by the FSB to recruit his parents, who live in the temporarily occupied part of the Luhansk region. According to the publication, Vitalii Tiebiekin was involved in investigations concerning the State Agency of Reserve of Ukraine[285].

Searches in the high treason case were conducted at three addresses associated with Tiebiekin: his apartment in Kyiv, his wife's residence, and the home of his parents-in-law in Uzhhorod.

Vitalii Tiebiekin pointed out that investigative (search) actions in criminal proceedings No. 22025101110000774 were carried out simultaneously against other NABU detectives who were not connected to one another – whether by department, joint investigative teams, family ties, or personal relationships – and were linked only by the formal pretext of investigating high treason. In his view, this was precisely why SSU officers conducted searches of his home and those of his family members, given the SSU's exclusive investigative jurisdiction over this category of cases.

As a result of the search, the investigator seized two mobile phones, two laptops, and several USB flash drives, referring to the presence of deleted sessions. Tiebiekin believes that the focus on electronic data storage devices and the investigator's inability to explain the purpose of the search indicate that he was likely acting on instructions to seize those items and documents.

284 Ruling of the Kyiv Court of Appeal of 10 December 2025 in Case No. 757/35187/25-k: https://reyestr.court.gov.ua/Review/132658655

285 "Summer Counteroffensive. What Evidence of Russian Influence over NABU Does the SSU Have?", Ukrainska Pravda, 6 August 2025: https://www.pravda.com.ua/articles/2025/08/06/7524969/

On 10 September 2025, Vitalii Tiebiekin was notified of suspicion of false declaration (see the description of the case below).

In December 2025, the Kyiv Court of Appeal overturned the rulings of the Pecherskyi District Court of Kyiv ordering the seizure of property belonging to Tiebiekin's parents-in-law and his wife.

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As of May 2026, the criminal proceedings concerning the alleged concealment of relatives' Russian citizenship involving **Kostiantyn Polkin**, **Oleksii Diadenko**, **Oleksandr Usov**, **Eduard Smirnov**, **Ivan Kravchuk**, **Yurii Tsvietkov**, and **Vitalii Tiebiekin** remain ongoing. Only the last of them has been notified of suspicion – in connection with alleged false declaration – while none of the other NABU officials has been notified of suspicion of committing any criminal offence. Almost all of them have already had their security clearance reinstated.

THE CASE OF VITALII TIEBIEKIN

On 10 September 2025, the SSU announced that, together with the OPG and the SBI, it had exposed a NABU official for alleged false declaration and concealment of real estate, and had notified him of suspicion[286]. According to the investigation materials, the Bureau official's family purchased a two-bedroom apartment in a residential complex in Uzhhorod worth approximately USD 100,000, registering ownership in the name of the mother of a close acquaintance. The statement alleges that the family lived in the apartment, but that the NABU official failed to declare it in his 2023 declaration and listed it as rented in his 2024 declaration. According to the investigation, the person in whose name the property was registered did not receive any payment for its use[287].

The evidence presented included correspondence between the NABU official and his wife, statements from the seller of the apartment and the notary who handled the transfer of ownership, as well as an audio recording interpreted as a conversation between a relative of the nominal owner and the NABU official concerning the outcome of questioning by the SSU. According to the OPG, the NABU official is suspected of including false information in his asset declaration amounting to UAH 4.3 million[288]. NABU responded to the SSU statement by noting that, during the second half of 2024, it had conducted a review concerning the deputy head of a NABU detective unit and his family members and had found no evidence of false declaration. However, the review did not extend to third parties. The Bureau also announced the launch of an internal investigation into the circumstances described in the SSU materials[289].

Vitalii Tiebiekin during the hearing on the imposition of preventive measures on 11 September 2025 at the Pecherskyi District Court of Kyiv.

Photo credit: Oleksii Arunian for Suspilne News

On 11 September 2025, the Pecherskyi District Court of Kyiv suspended Vitalii Tiebiekin from office for two months and imposed preventive measures in the form of bail exceeding UAH 2.9 million and a personal recognisance until 7 November 2025. The ruling was issued by Oleh Bilotserkivets, Investigating Judge, who partially granted the prosecutor's motion, although the prosecutor had sought bail exceeding UAH 4 million.

286 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 366-2(1): https://zakon.rada.gov.ua/laws/show/2341-14#Text

287 "The SSU, the OPG and the SBI Expose a NABU Official for False Asset Declarations and Concealing Real Estate", Security Service of Ukraine YouTube channel, 10 September 2025: https://www.youtube.com/watch?v=Vbn4Pw9GkQU

288 "NABU Official Served with a Notice of Suspicion for Declaring False Information Exceeding UAH 4.3 Million", Office of the Prosecutor General, 10 September 2025: https://surl.li/olhaik

289 "Regarding the Information Released by the Security Service of Ukraine Alleging False Information in the Asset Declaration of the Deputy Head of One of NABU's Detective Units, We State the Following", NABU Facebook page, 10 September 2025: https://www.facebook.com/share/p/1DXymtTtxT/?mibextid=wwXIfr

The defenceasked the court to dismiss the prosecutors' motion, arguing that the property had been declared in accordance with the applicable legal requirements. She also argued that the amount of bail was disproportionate because Vitalii Tiebiekin supports his wife and two children. Tiebiekin also denied the allegations against him[290].

However, the amount of bail was widely criticised as exceeding the statutory limits established by the CPC of Ukraine[291]. Transparency International Ukraine noted that, given the classification of the alleged offence as a non-serious crime, the maximum amount of bail is capped at 20 subsistence minimums for able-bodied persons, amounting to approximately UAH 60,000, and that the HACC imposes bail at that level in comparable proceedings[292].

In December 2025, the Kyiv Court of Appeal reduced the amount of bail from UAH 3 million to UAH 45,000. As of May 2026, the proceedings remain ongoing, and the prosecution is disclosing the materials of the pre-trial investigation to the defence[293].

ALLEGATIONS OF FACILITATING HENNADII BOHOLIUBOV'S ILLEGAL DEPARTURE FROM UKRAINE

In its press release of 21 July 2025 concerning Fedir Khrystenko, Member of Parliament, who was notified of suspicion in absentia of high treason[294] and influence peddling[295], the SSU stated that he "*was a senior agent (resident) of the FSB of and was responsible for strengthening Russian influence over NABU*"[296]**.** According to the investigation, Khrystenko maintained close relations with several senior officials of the Bureau, including Ruslan Mahamedrasulov and Oleksandr Skomarov.

According to the SSU, Khrystenko helped organise the border crossing of Hennadii Boholiubov, the business partner of Ihor Kolomoiskyi. The investigation alleges that two subordinates of Skomarov accompanied the fugitive oligarch by travelling in the neighbouring compartment and were formally sent on a business trip for that purpose in order to "*maintain contact with Kolomoiskyi*". The SSU also published screenshots of correspondence belonging to the imprisoned Ihor Kolomoiskyi, which it claims may indicate that his criminal proceedings could be closed with the assistance of NABU.

NABU explained that the detectives in question had been on an official business trip at the invitation of the StAR Initiative (Stolen Asset Recovery Initiative), a joint programme of the World Bank and the United Nations Office on Drugs and Crime (UNODC)[297]. The Bureau therefore maintained that their trip to Vienna was official. It involved attending events held as part of the Global Forum in Vienna on 25–27 June 2024 and was in no way connected with Boholiubov's departure from Ukraine.

At a joint briefing on 22 July 2025, Vasyl Maliuk, then Head of the SSU, and Ruslan Kravchenko, Prosecutor General, addressed the allegations. Maliuk expressed confidence that NABU officers had accompanied Boholiubov during his departure from Ukraine. As evidence, he referred to audio recordings[298], in which Khrystenko allegedly spoke about this and to the fact that the officers had travelled in the neighbouring

290 "NABU Detective Suspected of Filing a False Asset Declaration Suspended from Office", Suspilne News, 11 September 2025: https://suspilne.media/1112590-detektiva-nabu-akogo-pidozruut-u-nedostovirnomu-deklaruvanni-vidstoronili-vid-posadi/

291 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 182(5)(1): https://zakon.rada.gov.ua/laws/show/z0705-98#Text

292 "Key Questions About the Cases Involving NABU Employees", Transparency International Ukraine, 8 October 2025: https://ti-ukraine.org/news/klyuchovi-pytannya-pro-spravy-shhodo-pratsivnykiv-nabu/

293 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 290: https://zakon.rada.gov.ua/laws/show/2341-14#Text

294 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 28(2), Article 111(1), (2): https://zakon.rada.gov.ua/laws/show/2341-14#Text

295 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 369-2(2): https://zakon.rada.gov.ua/laws/show/2341-14#Text

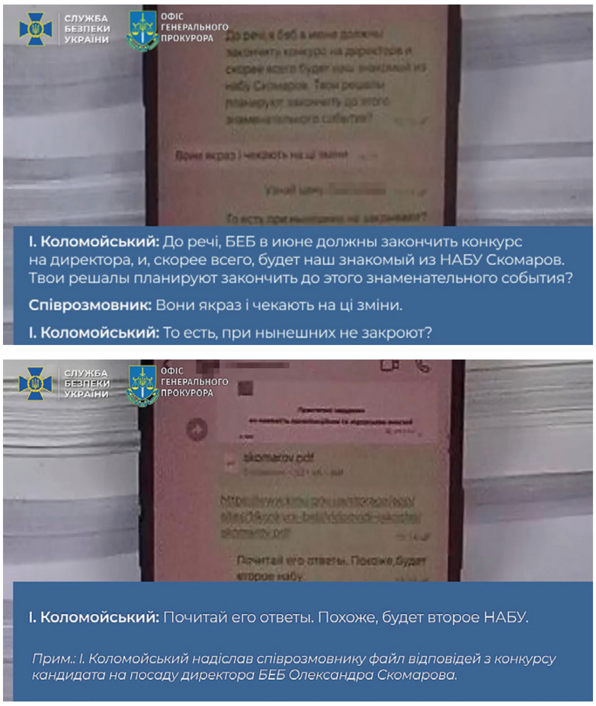
296 "The SSU and the OPG Expose a Sitting Member of the Ukrainian Parliament for Working for Russia: He Had Significant Influence over NABU's Activities (Video)", Security Service of Ukraine, 21 July 2025: https://ssu.gov.ua/novyny/sbu-ta-ohp-vykryly-chynnoho-narodnoho-deputata-ukrainy-u-roboti-na-rf-vin-mav-znachnyi-vplyv-na-diialnist-nabu-video

297 "Further Clarification in Response to the SSU's Publication", NABU Facebook page, 21 July 2025: https://www.facebook.com/nabu.gov.ua/posts/pfbid02GGaKiBLPUFdNvmaBRJLWUxr21p1s28HhxVFDLsiFZgjemRMZSUUMYUokBfUYVCG6l

298 "The SSU and the OPG Expose a Sitting Ukrainian MP for Working for Russia: He Had Significant Influence over NABU's Activities", Security Service of Ukraine YouTube channel, 21 July 2025: https://youtu.be/guZsLdU-Fmo?t=204

railway compartment. At the same time, Kravchenko insisted that the evidence needed to be examined before any final legal assessment could be made, as they had received additional materials from NABU concerning the official business trip of its officers[299].

On 6 August 2025, Ukrainska Pravda published the official travel order assigning Skomarov's subordinates – Dmytro Atamanchuk and Illia Statura – to Vienna from 23 to 29 June 2024. The order was signed by Semen Kryvonos, Director of NABU. The journalists questioned the SSU's account that the detectives had accompanied the businessman to facilitate his departure: "*It is unclear how NABU officers could have enabled Boholiubov to cross the border or how they could have been of any assistance to him had the attempt failed*"[300].



Screenshots of Ihor Kolomoiskyi's correspondence published by the SSU and the OPG on 21 July 2025.
Screenshot from a video published on the SSU's YouTube channel

According to the publication, the only evidence suggesting a connection between Skomarov and Khrystenko was that, at the beginning of the full-scale invasion, the NABU official's wife left Ukraine in a car owned by the wife of the Member of Parliament. Skomarov described this as a coincidence and denied knowing Khrystenko. He explained that, on 25 February 2022, while trying to evacuate his wife and their two-year-old child from Ukraine, he was unable to find anyone to transport them. Later, one of his acquaintances gave him the contact details of a man over the age of 60 who transported cars abroad for a fee and was willing to take his family in one of them. The NABU official stated that, on 26 February 2022, he, his wife, their child, and his mother-in-law travelled to Berehove in Zakarpattia, where the elderly man helped his family leave Ukraine. According to border crossing records, Olha Skomarova, her son Matvii, her mother Olena Stefanova, and the driver Andrii Hailo left Ukraine on 26 February 2022. At the time the article was published, law enforcement authorities were still examining the identity of the driver, although the publication noted that he had no direct links to Khrystenko[301].

None of them – Skomarov, Statura, or Atamanchuk – was notified of suspicion. Nevertheless, searches were conducted at all of their homes on 21 July 2025.

Dmytro Atamanchuk, Senior Detective of NABU, stated that the searches took place while he was on parental leave following the birth of his child, during which he had been visiting relatives at various locations in the Khmelnytskyi region. On 21 July 2025, he was staying with his wife and their three young children at the home of his 87-year-old grandmother in a village in the Khmelnytskyi region, where they had arrived the previous evening from Kamianets-Podilskyi, where they had been visiting his parents. It was to his grandmother's house that SSU officers arrived at approximately 8–9 a.m. The detective believes that he had been subjected to unlawful surveillance and other covert investigative (search) actions (CISA) or operational measures, since he was not at his usual place of residence and had changed his location only the day before.

According to Atamanchuk, the law enforcement officers entered the house without obstruction because the door was unlocked. Some members of the family were outside in the yard. He was in bed when several men wearing uniforms and face coverings burst into the room. They snatched his locked mobile

299 "Searches at NABU! Scandal over Law No. 12414! Vasyl Maliuk and Ruslan Kravchenko Answer Questions! Full Version!", TSN YouTube channel, 22 July 2025: https://youtu.be/xHvAeQZEUb4?t=1827

300 "Summer Counteroffensive. What Evidence of Russian Influence over NABU Does the SSU Have?", Ukrainska Pravda, 6 August 2025: https://www.pravda.com.ua/articles/2025/08/06/7524969/

301 Ibid.

phone from his hands, identified themselves as officers of the TCR and SS, and demanded access to the Reserve+ application. The detective stated that, when he asked to see their documents and requested an explanation of the purpose of the visit, he received no clear answer. One of the officers briefly waved an SSU identification card in front of his face, giving him no opportunity to examine it, and showed him a photograph of the order assigning him to Vienna on an official business trip the previous year, implying that he and a colleague had facilitated another person's unlawful departure from Ukraine, without naming that person. At the same time, according to Atamanchuk, another law enforcement officer attempted to force the unlocking of his mobile phone using his fingerprint.

The detective stated that he voluntarily agreed to provide the passcode to his mobile phone because he wanted to protect his wife, who was present, from harm to her health and from potential difficulties with breastfeeding their child. He emphasised that these actions took place without video recording, without any explanation of his rights and obligations, and without a clear statement of the legal grounds for the officers' presence.

The law enforcement officers offered him the opportunity to formally record the investigative (search) action on video by handing over his phone and providing its passcode. Otherwise, according to Atamanchuk, they threatened to conduct an aggressive search of the house and the surrounding property, which he wished to avoid so as not to further distress his grandmother, whose blood pressure had risen as a result of these events. The search was conducted by Volodymyr Ryzhenko, SSU investigator. He decided to seize the mobile phones of the detective and his wife on the grounds that they contained correspondence in which the detective referred to his planned official business trip to Vienna.

Atamanchuk noted that the SSU officers were unable to explain why an urgent search was necessary in relation to events that had occurred the previous year, while investigator Ryzhenko "*displayed no independent judgement and constantly adjusted his actions after consulting someone by telephone*". Only during the investigative (search) action itself, the detective noted, did the SSU officers explain that they were examining his possible involvement in facilitating Hennadii Boholiubov's unlawful crossing of the state border, as Boholiubov had left Ukraine on the same train that Atamanchuk had taken for his official business trip.

In Atamanchuk's view, the scale of the operation was clearly disproportionate to the circumstances under investigation: approximately fifteen armed individuals wearing face coverings and protective gear took part in the search, arriving in at least five passenger cars and one minibus.

After the search, Dmytro Atamanchuk was questioned as a witness regarding the circumstances of his official business trip. He was also informed that an urgent search was planned at his permanent place of residence in the Kyiv region, where a team of SSU officers had been waiting since 5:00 a.m. that same day. He was invited to accompany the SSU officers there so that they would not have to force entry into the house. He agreed, and the search took place at around 7:00 p.m. According to the detective, nothing that could have been of interest to the investigator was found or seized during that search.

Based on media reports published at the time, Atamanchuk concluded that the searches were politically motivated and directed against NABU. SSU officers gained access to the contents of his mobile phone, which contained both personal information, including family photographs and correspondence, and official information. The detective noted that his contacts included confidential sources and that access to their identities could adversely affect future cooperation with them and the Bureau's work more broadly.

Atamanchuk's motion, submitted to the Shevchenkivskyi District Court of Kyiv, seeking to participate in the hearing on the motion for retrospective authorisation of the search, remained unanswered. On 3 September 2025, the detective submitted a motion to the Main Investigative Department of the SSU requesting information on the court rulings authorising the urgent searches. In its undated reply, the SSU issued a resolution partially refusing the request. Also in September, he applied to the Pecherskyi District Court of Kyiv seeking access to the materials attached to the motions, but his request was refused, and he was advised to contact the investigator instead.

A search was conducted on 21 July 2025, at the hotel room of Illia Statura, Deputy Head of a NABU detective unit, while he was on holiday in the Carpathian Mountains. He stated that, at around 5:15 a.m, he and his wife, Yana Statura, who is also a NABU employee involved in conducting investigative (search) actions and operational-search activities, were awakened by individuals armed with assault rifles and dressed in military camouflage, who were standing directly beside their bed. According to Statura, approximately five or six people were present in the room at that time, and for some time they neither identified themselves nor provided any explanation. They also attempted to unlock the couple's mobile phones by holding them up to their faces, apparently in an attempt to activate Face ID. When the phones did not unlock, the law enforcement officers aggressively demanded that they enter the passcodes. In addition, one of the officers photographed them while they were wearing only their underwear. When Statura asked why they were being photographed, he was told: "*Because I want to*". He also repeatedly asked who the individuals were and what they were doing in the couple's hotel room.

Eventually, two of the men asked the NABU official to step into the bathroom, where they identified themselves as SSU officers – one of whom later turned out to be the investigator – and informed him that a search would be conducted in connection with suspected high treason. According to Statura, one of them repeatedly held a mobile phone screen in front of his face displaying part of the order assigning him to an official business trip in June 2024. These actions were accompanied by aggressive remarks such as: "*We know everything*", "*You're not the one we're after*", "*You were only following orders*", as well as calls for him to give evidence against his superiors. Another officer stated that the deputy head of the detective unit would have his security clearance revoked the following day because he had allegedly concealed the Russian citizenship of his parents. Illia Statura replied that his father had died in 2010 and asked when exactly his parents had supposedly obtained Russian citizenship. The officer, appearing embarrassed, answered that he could not remember.

After returning to the main room, Statura learned from his wife that one of the SSU officers, while holding an assault rifle, had intimidated her into revealing the passcode to her mobile phone.

The investigator informed him that an urgent search would commence, justifying it on the grounds that NABU detectives had allegedly facilitated Hennadii Boholiubov's departure from Ukraine. In Statura's view, none of the grounds provided for by the CPC of Ukraine for conducting a search of a person's home or other property existed in this case, and he therefore considers the search to have been unlawful[302].

During the search, one of the SSU officers again attempted to persuade him to give evidence against the NABU leadership. The officer showed Statura a post on a Telegram channel containing photographs from the searches conducted at the homes of Oleksandr Skomarov and Ruslan Mahamedrasulov. According to the NABU official, the latter was lying face down on the floor with his hands handcuffed behind his back. At the same time, the officer whispered to him: "*You see? This is what will happen to all of you*".

According to the copy of the search record provided to Statura after the investigative (search) actions had been completed, they were carried out within criminal proceedings opened on 16 June 2025 concerning a number of alleged criminal offences, including offences committed by a group of persons acting in prior conspiracy, high treason (including high treason allegedly committed by a group of persons), and repeated influence peddling or influence peddling committed by a group of persons acting in prior conspiracy[303].

Searches were also conducted of the vehicle used by the couple and of their residence in Kyiv. Statura is convinced that he and his wife had been placed under surveillance, as they were not staying at their permanent place of residence. Moreover, the day before the searches they had changed their plans to return to Kyiv and moved to a different hotel in another location.

He and his wife wanted to return to Kyiv immediately, however, they were required to wait in their car for approximately three hours while the SSU officers sought instructions from their superiors on how to proceed. "*Whenever I repeatedly asked whether I had been detained, whether I was free to leave (...) I was told that no decision had yet been made. Not wanting to escalate a situation that I did not understand, I decided not to argue*", Statura said.

302 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 233(3): https://zakon.rada.gov.ua/laws/show/4651-17#Text

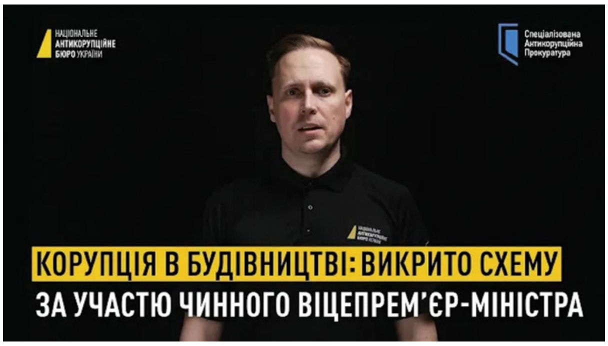
303 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 111(1), (2), Article 28(2), Article 369-2(2): https://surl.li/corgwa

As a result of the searches, SSU officers seized the locked mobile phone of the NABU official and his wife's unlocked mobile phone. The exact list of items seized from their Kyiv apartment is unknown because no search record was provided. However, according to Statura, two laptops and several USB flash drives were missing. This is also confirmed by the court ruling ordering the seizure of property removed from the Kyiv address[304].

Statura believes that the nature of the searches indicates that the law enforcement officers were pursuing three main objectives. First, to persuade him to give evidence that would discredit the NABU leadership and the institution as a whole. Second, to gain access to the information stored on their mobile phones. Third, to find other compromising material that could be used to discredit the Bureau and its leadership. In his view, the manner in which the searches were conducted indicates that their purpose was to intimidate NABU staff in order to disrupt pre-trial investigations and obtain information about the relevant criminal proceedings.

Statura is convinced that the searches were directly linked to the pre-trial investigation of one of the criminal proceedings in which he serves as the head of the team of detectives and to which his official business trip to Vienna was related, as well as to a desire for retaliation and to gain access to sensitive information stored on the seized devices. The NABU official also noted that the SSU's access to information about confidential sources poses a threat not only to the relevant criminal proceedings and ongoing operational work, but also to the lives and health of those individuals.

Oleksandr Skomarov is the former Head of the Second Main Detective Unit of NABU, having left the position on 1 January 2026. The unit under his leadership handled criminal proceedings that resulted in individuals being brought to justice in, among others, cases concerning corruption in Ukravtodor (State Agency of Automobile Roads of Ukraine), the embezzlement of petroleum products worth nearly UAH 1 billion, the embezzlement of funds from JSC CB PrivatBank, the activities of a criminal organisation within the State Property Fund of Ukraine, and the unlawful takeover of Odesa Airport. In 2021, he led Ukraine's first operation to detain an individual attempting to leave the country on a charter flight. In 2022, Skomarov received NABU's highest distinction, "For Outstanding Contribution to the Fight against Corruption[305]. He worked on the case involving Oleksii Chernyshov, former Deputy Prime Minister for National Unity and presidential ally, who was notified of suspicion by NABU and SAPO on 23 June 2025 of abuse of office and obtaining an undue benefit on an especially large scale for himself and third parties[306].



Oleksandr Skomarov explains the grounds for notifying the then Deputy Prime Minister of suspicion. The official concerned is Oleksii Chernyshov, who at that time served as Minister of National Unity.

Screenshot from a video published on the NABU YouTube channel

The search of Skomarov was conducted on 21 July 2025 at his family's residence in Kyiv. During the searches, the mobile phones of Skomarov and his wife, an iPad, and a hard drive containing publicly available databases were seized.

It is worth noting that, on 8 June 2025, during the final interviews for the position of Director of the ESBU, Oleksandr Skomarov stated on his Facebook page that a campaign had been launched against him through anonymous Telegram channels and websites claiming that his father had obtained Russian citizenship in 2024. The NABU official explained that his elderly father, who remained under occupation in the Luhansk region, had been subjected to forced passportisation and that the document was necessary to enable him to leave the TOT without obstruction. He also stressed that his

304 Ruling of the Pecherskyi District Court of Kyiv of 26 September 2025 in Case No. 757/35460/25-k: https://reyestr.court.gov.ua/Review/130526521

305 Application by Oleksandr Skomarov to Participate in the Competition for the Position of Director of the Bureau of Economic Security of Ukraine, 10 January 2025: https://www.kmu.gov.ua/storage/app/sites/1/konkyrs-beb/kandydaty2025/34.%20Skomarov.pdf

306 "Corruption at the Ministry for Communities and Territories Development: Sitting Deputy Prime Minister Suspected (Video)", National Anti-Corruption Bureau of Ukraine, 23 June 2025: https://surli.cc/hamowz

father had no business or any other ties with the occupying authorities, adding that "*simply writing about the passport alone would have been too bland and uninteresting*". Skomarov linked the media campaign to the fact that he had ranked first among the candidates for the position of ESBU Director[307].

As of May 2026, the criminal proceedings concerning the alleged facilitation of Hennadii Boholiubov's unlawful crossing of Ukraine's state border remained ongoing. **Oleksandr Skomarov**, **Dmytro Atamanchuk**, and **Illia Statura** were among those involved in the proceedings, but none of them had been notified of suspicion of committing any criminal offence.

PERSECUTION OF FORMER NABU DETECTIVES AND ANTI-CORRUPTION ACTIVIST OLENA SHCHERBAN

From August 2025, after Olena Shcherban, a lawyer and Deputy Executive Director of AntAC, joined the defence of Ruslan Mahamedrasulov, Head of a NABU detective unit, and began actively working on the case of Vitaliy Shabunin, she says that pressure began to be exerted against her. At that time, she reported an attempt to deprive her of the right to practise law on the grounds that she had allegedly failed to complete the mandatory annual continuing professional training. It was in August that two corresponding complaints against her were submitted to the Volyn Qualification and Disciplinary Commission of the Bar[308].

Shcherban noted that she had not completed the training, as had many other lawyers, in part because the relevant requirements are being challenged before the Supreme Court. Earlier, the Court of Appeal in that case had ruled in favour of the lawyers[309]. Subsequently, to avoid any risk to her practising certificate, Shcherban completed additional paid assessments at the Higher School of Advocacy and obtained the required number of points. As a result, the Volyn Qualification and Disciplinary Commission of the Bar decided not to initiate disciplinary proceedings on the basis of those complaints.

Olena Shcherban represents the interests of Ruslan Mahamedrasulov before the Kyiv Court of Appeal, 3 December 2025.

Photo credit: Oleksii Arunian for Suspilne News

At the same time, a smear campaign targeting the anti-corruption activist and her brother, **Taras Likunov**, began through anonymous Telegram channels. In particular, in August, Serhii Ivanov, blogger, who has been linked to the Office of the President[310], published a post on his Telegram channel discrediting Likunov, Shcherban, and AntAC[311], while the Telegram channel INSIDER UA reposted the defamatory claims from that publication[312]. Similar posts targeting Likunov and Shcherban also

307 "Oleksandr Skomarov, Candidate for the Position of Director of the ESBU, on His Father's Russian Passport: He Was Forced to Obtain It While Living Under Occupation", Censor.NET, 8 June 2025: https://censor.net/ua/news/3556754/skomarov-poyasnyv-nayavnist-pasporta-rf-v-yiogo-batka-perebuvannyam-v-okupatsiyi

308 "Olena Shcherban, Lawyer for Activist Vitaliy Shabunin, Reports Pressure and an Attempt to Revoke Her Licence", ZMINA, 15 August 2025: https://zmina.info/news/advokatka-aktyvista-vitaliya-shabunina-olena-shherban-zayavyla-pro-tysk-i-sprobu-pozbavyty-yiyi-advokatskoyi-liczenziyi/

309 "No More Points Required: Court Abolishes the Requirement for Lawyers to Complete a Set Number of Continuing Professional Development Hours", DeJure Foundation, 25 October 2025: https://dejure.foundation/baly-bilshe-ne-potribni-sud-skasuvav-vymogu-advokatam-pidvyshhuvaty-kvalifikacziyu-z-vyznachenoyu-kilkistyu-godyn/

310 "Natalia Lihachova, Media Expert, Names Two "Black Political Strategists" Working for the Office of the President", NV, 14 October 2023: https://nv.ua/ukr/ukraine/politics/sergiy-ivanov-ta-volodimir-petrov-op-vikoristovuye-mediakileriv-kazhe-nataliya-ligachova-50360556.html

311 "Everything Became Clear About "the Shabunin camp" Once They Started Fawning Over Oleksandr Kubrakov, Whom They Had Previously Called a "Technocrat-Thief' and Almost the Country's Chief Corrupt Official", Serhii Ivanov Telegram channel, 7 August 2025: https://t.me/ivanoise/12123

312 "Shabunin's Subordinates Caught in Fraud: They Took Jobs with the Very People They Were Supposed to Expose", INSIDER UA Telegram channel, 7 August 2025: https://t.me/insiderUKR/103973

appeared on the INSIDER UA Telegram channel during August[313] and later in September[314]. Amid this smear campaign, on 25 September 2025, SSU officers conducted a search of the apartment where Likunov lives.

Taras Likunov is a former detective who now works in the internal security unit of Ukrzaliznytsia and serves as Deputy Head of the Corporate Security Department under **Oleksandr Rykovtsev**. This department is one of the functional elements of the anti-corruption infrastructure introduced at Ukrzaliznytsia in February 2024[315]. On the same day, searches were also conducted at the homes of Rykovtsev and his other deputies – **Bohdan Brovko** and **Serhii Medetskyi**. All of them joined Ukrzaliznytsia from NABU, where they had worked as detectives until 2024 and investigated corruption within the state-owned company. In particular, Likunov had investigated the unlawful misappropriation of Ukrzaliznytsia funds involving Artem Shylo, SSU officer.

NABU linked these investigative (search) actions to the former detectives' earlier investigations exposing corruption at state-owned enterprises and within public authorities, including the SSU, stating that they may indicate increasing systematic pressure on the independence of Ukraine's anti-corruption institutions[316]. In response, the SSU stated that the searches were connected to a criminal case concerning alleged abuses in freight transportation at Ukrzaliznytsia and had been authorised by the court[317].

However, the ruling of the Pecherskyi District Court of Kyiv authorising the search of Taras Likunov, a copy of which was published by AntAC, states that the SBI and the SSU conducted the search within criminal proceedings concerning Fedir Khrystenko, Member of Parliament of the banned OPFL, on the grounds that evidence relevant to those proceedings might be located at his place of residence[318].

In October 2025, the publication Babel, citing three independent sources, reported that Khrystenko was giving evidence against Oleksandr Klymenko, Head of SAPO, in the case involving former NABU detectives Taras Likunov, Bohdan Brovko, and Oleksandr Rykovtsev, and that the SSU was examining Klymenko's possible involvement in the case[319].

According to a copy of the search warrant for Oleksandr Rykovtsev, cited by NV, the investigative (search) actions were likewise conducted within the criminal proceedings concerning Fedir Khrystenko, who is suspected of high treason and influence peddling[320]. According to the prosecution's account set out in the SSU's motion for the search, Viacheslav Yeromin, a member of the Management Board of JSC Ukrzaliznytsia, allegedly abused his official position and organised a scheme to generate excessive profits for himself and companies under his control, involving Oleksandr Rykovtsev and his three deputies in its implementation.

Rykovtsev, however, links the investigative (search) actions to the systematic campaign of pressure against Ukraine's anti-corruption institutions that has been ongoing since July 2025. He believes that

313 "He Investigated Corruption at Ukrainian Railways, Then Ended Up Running It – Former NABU Detective Likunov Caught Breaking the Law", INSIDER UA Telegram channel, 14 August 2025: https://t.me/insiderUKR/104422

314 "Shabunin's Team Has Effectively Admitted to Taking Part in Corruption Schemes", INSIDER UA Telegram channel, 25 September 2025: https://t.me/insiderUKR/107457

315 "Ukrainian Railways Introduces an Anti-Corruption System That Meets International Standards", Ukrainian Railways, 7 February 2024: https://www.uz.gov.ua/press_center/up_to_date_topic/page-2/623054/

316 "The National Bureau Informs That Today the SSU Is Conducting Investigative Actions Against Former National Bureau Detectives (Now Employees of Ukrainian Railways)", NABU Facebook page, 25 September 2025: https://www.facebook.com/share/p/198RacPpio/?mibextid=wwXIfr

317 "On 25 September, the Security Service of Ukraine Launched a Series of Court-Authorised Searches in Criminal Proceedings Concerning Abuses in Ukrainian Railways' Freight Transport Operations", Security Service of Ukraine Facebook page, 25 September 2025: https://www.facebook.com/share/p/18orFeV5Ed/?mibextid=wwXIfr

318 "The SSU Searched the Home of the Brother of Olena Shcherban, Member of the Anti-Corruption Action Centre Board and Lawyer for Mahamedrasulov. He Was the Lawyer Handling the Case of Artem Shylo", Anti-Corruption Action Centre, 25 September 2025: https://antac.org.ua/news/sbu-obshukalo-ridnoho-brata-chlena-pravlinnia-tspk-ta-advokatky-mahamedrasulova-oleny-shcherban-same-vin-viv-spravu-artema-shyla/

319 "Babel Sources: The SSU Is Examining the Possible Involvement of Oleksandr Klymenko, Head of SAPO, in a Case Involving Khrystenko, an MP from OPFL", Babel, 6 October 2025: https://babel.ua/news/121991-dzherela-babelya-sbu-vivchaye-prichetnist-kerivnika-sap-klimenka-do-spravi-de-figuruye-nardep-vid-opzzh-hristenko

320 "In the Shadow of the Mindich Case. How Multi-Million Contracts and SSU Searches at Ukrainian Railways Are Linked to NABU's Operation Midas – An NV Investigation", NV, 20 December 2025: https://nv.ua/ukr/ukraine/politics/sprava-mindicha-i-zvilnennya-yermaka-pov-yazani-z-obshukami-u-kolishnih-detektiviv-nabu-v-ukrzaliznici-50569939.html

the information contained in the court ruling, on which the investigator, the Prosecutor General, and the court relied, bears signs of falsification and forgery. In a comment to NV, Likunov stated that he viewed the searches as a form of pressure and an attempt to find compromising material. In his view, they were prompted by his anti-corruption work at JSC Ukrzaliznytsia, the investigations he had conducted into the state-owned company while working at NABU, and the involvement of his sister, Olena Shcherban, as a defence lawyer in the case of NABU official Ruslan Mahamedrasulov.

ROAD TRAFFIC ACCIDENT CASES

Against the backdrop of the large-scale searches in July 2025, the Office of the Prosecutor General, acting on the basis of materials prepared by the SBI, notified three NABU employees of suspicion of violating road traffic safety rules resulting in victims sustaining moderate bodily injuries and serious bodily injuries[321]. According to the SBI press release, the prosecution intended to seek pre-trial detention for at least two of the suspects[322]. The relevant offence carries a maximum penalty of eight years' imprisonment. In each of these cases, the pre-trial investigation had already been ongoing for several years by the time the suspects were notified of suspicion; however, the SBI did not mention this in its statement.

One of these employees was **Yevhen Tokar**, Head of the NABU Detective Unit for Organisational and Analytical Support and Strategic Development, which effectively serves as the headquarters for the Bureau's principal detective units. The unit handles a substantial volume of sensitive information, including information protected by the confidentiality of the pre-trial investigation[323].

Tokar's case concerns a road traffic accident that occurred in May 2021. Following a collision with another vehicle, his car left the carriageway and struck a pedestrian. The victim sustained serious bodily injuries, resulting in the partial amputation of the left lower limb.

Search of one of the NABU employees in a road traffic accident case, 21 July 2025.

Photo credit: State Bureau of Investigation

According to the NABU official, the SBI carried out the principal procedural steps to collect and assess the evidence between May and August 2021, while the investigative (search) actions were completed in December 2022. Correspondence between the SBI and the Kyiv City Prosecutor's Office in 2022–2023 regarding the insufficiency of evidence to notify him of suspicion confirms, in his view, that the case lacked prospects, while its "revival" appears to have been politically motivated.

Describing the search conducted on 21 July 2025, Yevhen Tokar stated that, at around 6:45 a.m., he and his wife were awakened by loud banging on the apartment door. The individuals outside behaved aggressively, shouting and continuing to pound on the door. Not understanding what was happening, the couple began getting dressed, when they heard that the outer door, shared by two apartments, was already being forced open. Tokar opened the inner door to find out what was happening, while his frightened wife remained in the room.

At first, the NABU official saw several armed men wearing military-style multicam uniforms, carrying a ballistic shield and shining a torch directly into his face. Shouting *"State Bureau of Investigation!"*, they pinned him against the wall. According to Tokar, he then noticed another group of five men

321 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 286: https://zakon.rada.gov.ua/laws/show/2341-14#Text

322 "Based on SBI Materials, Three NABU Employees Have Been Served with Notices of Suspicion for Road Traffic Accidents Resulting in Serious Injuries to Victims (Video)", State Bureau of Investigation, 21 July 2025: https://surl.li/xutsct

323 ""You Are Subject to an Urgent Search": How a Four-Year-Old Road Traffic Accident Became the Basis for Coercive Measures Against Yevhen Tokar, NABU Detective", ZMINA, 13 May 2026: https://surl.li/dymshx

in dark tactical clothing standing further back on the staircase. One of them identified himself as SBI investigator Pavlo Rain and informed him that they intended to search his apartment. When Tokar asked about the investigating judge's warrant, the investigator replied that the search was being conducted as an urgent search within the criminal proceedings concerning the 2021 road traffic accident and that the urgency was justified by the risk of the destruction of property – namely, information storage devices that could serve as evidence in the case. However, he did not specify what particular information they were seeking.

In addition to the investigator, the search involved three SBI officers, an SBI computer forensics specialist, and two male attesting witnesses. Tokar noted that neither he nor his wife were informed of their rights during the search.

Under the psychological pressure exerted by eight armed SBI officers, who controlled the movements of his wife and daughter (the latter having returned home only after the investigative (search) actions had begun), the NABU official, at the investigator's request, handed over for inspection his daughter's and wife's laptops, a storage device belonging to NABU, several USB flash drives, and his own mobile phone. According to Tokar, despite the participation of an SBI computer forensics specialist, the examination was carried out only formally, without the use of specialist expertise or forensic techniques. The review consisted solely of searching for the keyword "road traffic accident", and although the required files were not found on most of the devices, the investigator decided to seize all of the information storage devices except his wife's mobile phone. Instead, the investigator asked her to unlock the device, ostensibly for examination, but immediately after the logical protection had been removed, copied its entire contents without first checking whether it contained any data relating to the road traffic accident. Tokar considers these actions to constitute an arbitrary interference with private life and emphasises that his wife was effectively misled[324].

According to the head of the detective unit, he repeatedly pointed out that the information storage devices contained sensitive personal, family, and official information, including information protected by the confidentiality of the pre-trial investigation and the identities of NABU's confidential sources, which was unrelated and could not even theoretically be relevant to the investigation of the road traffic accident. He also emphasised that seizing the storage devices despite the possibility of copying their contents was contrary to the provisions of the CPC of Ukraine governing the temporary seizure of electronic information systems, their components, and mobile communication terminals[325].

Prosecutor Oleksandr Sokoliuk, who arrived later, notified him of suspicion of violating road traffic safety rules or the rules governing the operation of transport, resulting in the death of a victim or serious bodily injuries[326]. The notice of suspicion was signed by Ihor Mustetsa, who was then Deputy Prosecutor General and left office in September 2025.

However, because his mobile phone had been seized and his freedom of movement was restricted, Tokar had no access to legal assistance from a lawyer, which further intensified the psychological pressure. After the search, the investigator served him with motions seeking pre-trial detention without the possibility of bail and his suspension from office. "*I perceived this as a clear manifestation of pressure and intimidation, since the nature of the offence attributed to me and my procedural conduct do not justify the application of the strictest preventive measure, namely pre-trial detention, while the alleged offence is in no way connected with my position, which precludes any lawful basis for suspending me from office*", commented the Head of the NABU detective unit.

According to the official, the investigative (search) actions caused him stress, humiliation, and an invasion of his privacy. In his view, the seizure of his personal data and the authorities' access to sensitive information created a risk of unlawful pressure being exerted against him. Yevhen Tokar also stated that he had suffered reputational damage because the forced entry during the search led his neighbours to perceive him as a dangerous criminal, while the public communications of the SSU and the OPG caused him to become associated with high treason, even though his case concerned a years-old road traffic accident.

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324 Ibid.

325 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 168(2): https://zakon.rada.gov.ua/laws/show/4651-17#Text

326 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 286(2): https://zakon.rada.gov.ua/laws/show/2341-14#Text

On 22 July 2025, Investigating Judge Svitlana Hrechana of the Pecherskyi District Court of Kyiv partially granted the motion submitted by the SBI and the prosecution, imposing a preventive measure in the form of night-time house arrest. In Tokar's view, this preventive measure was excessively severe, and the judge failed to explain why less restrictive measures would have been insufficient. The Head of the NABU detective unit was also suspended from performing his official duties. Tokar stated that the prosecutor was unaware of the position he held and did not explain how remaining in that position could obstruct the pre-trial investigation, while the materials accompanying the motion contained no up-to-date information regarding his powers and responsibilities.

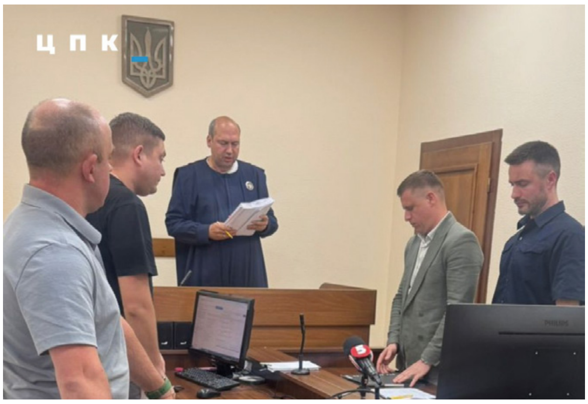
According to the NABU official, the night-time house arrest significantly limited his ability to visit his 75-year-old mother, who lives in Poltava, has health problems, and requires regular assistance with everyday tasks. He also stated that his suspension from office deprived him of the opportunity for professional fulfilment and undermined his motivation.

According to AntAC, after the road traffic accident Tokar assisted the victim both during his stay in hospital and after his discharge, including by supporting his rehabilitation, providing medication, and accompanying him to medical appointments. At the time the court considered the preventive measure, there was no possibility of influencing the victim, as he had died from causes unrelated to the road traffic accident[327].

On the same day, Tokar filed a motion with the Pecherskyi District Court of Kyiv seeking to participate in the hearing on the request for retrospective authorisation of the search, but the motion was dismissed. He also received a refusal in response to his motion of 30 July 2025 requesting the return of the seized property.

Between 25 and 28 July 2025, the defence lodged a series of appeals against the rulings of the Pecherskyi District Court of Kyiv concerning the seizure of property, the imposition of night-time house arrest, and the suspension from office. However, instead of being considered within three days as required by the CPC of Ukraine, the appeals were heard only after 46–53 days. Only the appeal concerning the property was upheld, with the Kyiv Court of Appeal finding that the seized property did not meet the criteria for material evidence[328].

On 19 September 2025, Judge Serhii Vovk of the Pecherskyi District Court of Kyiv extended the period of night-time house arrest until 17 November 2025, while Judge Mykhailo Yushkov extended Tokar's suspension from office until 14 November 2025. Tokar considers these decisions unfounded and the measures disproportionate, since the pre-trial investigation had, in practice, been completed by August 2025. At that time, he was informed that the prosecutor considered the evidence collected sufficient to refer the case to court, with only the disclosure of the case materials remaining[329].



Pecherskyi District Court of Kyiv extends the preventive measure imposed on Yevhen Tokar, 19 September 2025. Photo credit: Anti-Corruption Action Centre

Commenting on the case for Channel 5 at the Pecherskyi District Court of Kyiv, Yevhen Tokar stated that during the search on 21 July 2025, officers of the SSU and the SBI seized information storage devices that could have contained official and sensitive NABU data. He noted that, from the very beginning of the search, he had drawn the law enforcement officers' attention to the fact that one of the

327 "Pecherskyi District Court Places Yevhen Tokar, NABU Detective, Under Night-Time House Arrest", Anti-Corruption Action Centre Telegram channel, 22 July 2025: https://t.me/fuckcorruption/4075

328 Ruling of the Kyiv Court of Appeal of 9 September 2025 in Case No. 757/34130/25-k: https://reyestr.court.gov.ua/Review/130212414

329 ""You Are Subject to an Urgent Search": How a Four-Year-Old Road Traffic Accident Became the Basis for Coercive Measures Against Yevhen Tokar, NABU Detective", ZMINA, 13 May 2026: https://zmina.info/articles/u-vas-nevidkladnyj-obshuk-yak-rozsliduvannya-dtp-cherez-4-roky-stalo-pidstavoyu-dlya-sylovyh-dij-proty-detektyva-nabu-yevgena-tokarya/

seized items was a hard drive belonging to the National Anti-Corruption Bureau of Ukraine. In particular, it could have contained data relating to the "lawyer-hackers" case, in which the defendants are accused of systematically carrying out unlawful interference with the operation of the USRCD. The NABU official expressed the view that the procedural actions taken in his case may indicate pressure being exerted on him as a representative of the institution and a member of NABU's management team. He also pointed out that the road traffic accident had occurred while the traffic lights were not functioning and another vehicle was moving through the intersection at the same time[330].

Tokar appealed these decisions, but, as with his earlier appeals, the Kyiv Court of Appeal considered them significantly later than required by the CPC of Ukraine[331]. The appeal against the extension of the night-time house arrest was heard one month later, on the eve of the expiry of the measure. The appeal against the extension of his suspension from office was not considered within the period during which the investigating judge's ruling remained in force. Instead, it was heard only in December 2025, after the measure had already expired. As a result, the NABU official was effectively deprived of the opportunity to exercise an effective right of appeal.

Yevhen Tokar's case was referred to court at the end of September 2025. After several adjournments, a preparatory hearing took place on 28 November 2025 in the case, which had been transferred from the Pecherskyi District Court of Kyiv to the Solomianskyi District Court of Kyiv. The court refused to extend the preventive measure, and his suspension from office expired. Since then, Yevhen Tokar has resumed performing his official duties. The substantive hearing was scheduled to begin in early February 2026 but has not yet commenced.

The road traffic accident involving another NABU employee, **Maksym Sinchuk**, occurred in June 2021 on the Kyiv–Odesa motorway. While overtaking a vehicle travelling in the same direction, Sinchuk's car left the carriageway, overturned, and collided with a petrol station building. As a result of the accident, a passenger sustained serious bodily injuries, including multiple fractures, a ruptured spleen, and a cerebral contusion.

Maksym Sinchuk serves in NABU's specialised Special Operations Directorate. He was notified of suspicion under a notice signed by the then Deputy Prosecutor General, Ihor Mustetsa. No search was conducted at Sinchuk's home.

On 22 July 2025, four years after the road traffic accident, the Pecherskyi District Court of Kyiv imposed night-time house arrest on the NABU employee and suspended him from office until 16 September. Investigating Judge Mykhailo Yushkov refused to impose the preventive measure of pre-trial detention. As of May 2026, the trial remained ongoing, while both the preventive measure and the suspension from office had expired.

The third incident, involving **Anton Oliinyk**, occurred in August 2023. While driving an official vehicle through a signal-controlled junction in Kyiv, Oliinyk struck a woman who was crossing the carriageway at a pedestrian crossing on a green traffic light. The victim sustained moderate bodily injuries.

Oliinyk served in the Operational and Technical Directorate, which was reorganised into the O-2 Detective Unit on 1 January 2026. As with the other NABU employees, the search conducted at his home on 21 July 2025 took place without a court warrant. During the search, Oliinyk's mobile phone was seized.

Investigating Judge Svitlana Hrechana of the Pecherskyi District Court of Kyiv granted the motion seeking Oliinyk's suspension from office and the imposition of a personal recognisance obligation. The motion requesting the preventive measure was signed by Ihor Mustetsa.

Anton Oliinyk's case has now been effectively concluded. He entered into a reconciliation agreement with the victim[332] and was released from criminal liability.

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330 ""I Am Being Put Under Pressure": NABU Detective Yevhen Tokar Speaks About the Notice of Suspicion and the Searches", Channel 5, 19 September 2025: https://www.5.ua/suspilstvo/na-mene-chyniat-tysk-detektyv-nabu-tokar-rozpoviv-pro-pidozru-ta-obshuky-360332.html

331 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 422(2): https://zakon.rada.gov.ua/laws/show/4651-17#Text

332 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 46: https://zakon.rada.gov.ua/laws/show/2341-14#Text

ALLEGATIONS OF ILLICIT ENRICHMENT AND MONEY LAUNDERING

NABU officials **Valentyn Shmitko**, **Roman Niedov**, and **Mykhailo Romaniuk** have been accused of illicit enrichment[333], and money laundering, although none of them has been notified of suspicion. NABU linked these cases to the personal interests of the leadership of the SSU and the OPG. Shmitko and Niedov are the Head and Deputy Head of a NABU detective unit that, among other matters, investigated the unauthorised access to the restricted section of the USRCD. According to the investigation materials, such access may have been obtained by a group of lawyers led by Dmytro Borzykh, who is described in anti-corruption circles as an informal adviser to the Prosecutor General and a possible consultant involved in drafting the Draft Law No. 12414, which sought to restrict the institutional independence of NABU and SAPO. Romaniuk heads the NABU detective unit that investigated the case of Artem Shylo, former adviser to the Office of the President and former Head of Department "I" of the SSU, who is suspected of organising a corruption scheme in procurement for Ukrzaliznytsia[334]. In addition, Romaniuk participated in the investigation concerning SSU Brigadier General Illia Vitiuk, and earlier in the investigation into alleged abuses in the energy sector (the "Rotterdam+" case)[335].

Mykhailo Romaniuk (right), Denys Hiulmahomedov (centre), and Mykola Samoilenko (left) discuss the "Rotterdam+" case, which they were investigating at the time as NABU detectives (25 November 2020).

Photo credit: the NABU press service for LIGA.net

The searches conducted on 21 July 2025 were preceded by a media campaign alleging that NABU employees had engaged in illicit enrichment. According to **Valentyn Shmitko**, Head of a NABU detective unit, allegations against him began circulating between May and July 2025 on little-known media outlets and anonymous Telegram channels, claiming that he had unlawfully transferred funds abroad. The allegations concerned a declared international SWIFT transfer made on 24 September 2024 in the total amount of USD 105,200 from his wife's account to the bank account of CEI (USA)[336]. The NABU official explained that his wife had transferred the money to the account of a US clinic to pay for medical treatment – specifically, surgery for their eldest son. According to Shmitko, the funds had been accumulated primarily from salary income, as reflected in his asset declarations for 2015–2024, and the legality of the payment had been verified by the State Service for Financial Monitoring of Ukraine and the National Bank of Ukraine.

Several weeks before the events of July 2025, the NABU official noticed signs of surveillance, including vehicles with different registration plates that appeared to be tracking his movements, as well as plain-clothes operational officers conducting visual surveillance near his workplace and residence.

On 21 July 2025, a search was conducted at the apartment where Valentyn Shmitko lives with his wife and their two young children, aged one and a half and five. According to the head of the detective unit, the apartment belongs to his father-in-law, while he and his family have lived there since 2020, as reflected in his annual asset declarations. He stated that at around 6:00 a.m. that day he heard loud banging on the apartment door and shouting. His wife and children were frightened, and his younger son began to cry. Shmitko opened the door at the demand of armed men dressed in dark clothing who, according to him, threatened to force it open if he did not comply. He stated that two officers from the CSO "A" of the SSU, armed with assault rifles, several SSU operational officers, and

333 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 209(3), Article 368-5: https://zakon.rada.gov.ua/laws/show/2341-14#Text

334 "Summer Counteroffensive. What Evidence of Russian Influence over NABU Does the SSU Have?", Ukrainska Pravda, 6 August 2025: https://www.pravda.com.ua/articles/2025/08/06/7524969/

335 "NABU: The Security Service of Ukraine Conducts Searches at the Homes of Relatives of a Bureau Detective", Ukrainska Pravda, 20 October 2025: https://www.pravda.com.ua/news/2025/10/20/8003508/

336 Valentyn Shmitko's Asset Declaration for 2024 / Unified State Register of Asset Declarations, 31 March 2025: https://public.nazk.gov.ua/documents/e7dcd87c-5c9b-4472-a44b-ecfb939d76d3

an SBI investigator then entered the apartment. According to the NABU official, the investigator did not explain the substance of the investigation, merely referring to provisions of the CC of Ukraine concerning money laundering[337], and illicit enrichment[338], nor did he specify which particular items or documents were to be surrendered.

Shmitko believes that the claimed urgency of the search served merely as a pretext for searching for official information, including documents, data storage devices, and mobile phones containing sensitive information relating to investigations involving senior public officials. According to him, during the search, the law enforcement officers repeatedly asked specifically about such materials, as well as about the areas of work and categories of public officials under investigation, sometimes even asking for specific names.

During the search, the NABU official cooperated with the investigation by providing documents relating to the real estate he owned and used, the vehicle owned by his wife, and information about his expenses, while answering questions from the investigator and SSU officers. The family's only vehicle was also intended to be searched without an investigating judge's warrant. However, as Shmitko had taken it for repairs the previous day, the search did not take place.

As a result of the search, documents confirming the purchase and ownership of property, as well as a mobile phone, were seized. Shmitko, however, refused to disclose the password to his device because it contained official and confidential information. Law enforcement officers spent about an hour examining the contents of his official laptop, the password to which the NABU official entered himself. According to Shmitko, the laptop contained declassified audio recordings of intercepted communications relating to various public officials. Since this information is protected by law as part of the confidentiality of the pre-trial investigation, he did not specify whom the materials concerned and insisted that the laptop should not be seized. Ultimately, it was not seized. The officers also examined the contents of at least five USB flash drives containing family documents and photographs, as well as his wife's mobile phone, none of which they decided to seize.

According to Shmitko, these events caused psychological trauma to his young children, his wife lost her sense of safety in her own home, and he suffered reputational and moral harm. In his view, access to the data contained on the examined or seized storage devices could jeopardise the investigations conducted under his supervision within the Bureau.

In addition, another group of law enforcement officers entered the yard of a townhouse owned by Shmitko. According to him, the property had been purchased under a state mortgage programme, remained under construction, and was unfit for habitation. Shmitko learned from neighbours that the officers had climbed over the fence and photographed the interior of the building through the windows. However, he noted that no corresponding protocol was drawn up.

On the same day, SSU officers together with an SBI investigator also conducted a search of his brother's house without a court warrant. His brother learned about the planned investigative (search) actions immediately before they began through a telephone call from the NABU official, who was present throughout the search. Valentyn Shmitko maintains that he neither owns the house, nor has he ever lived there or contributed to its financing. It is occupied by relatives who were displaced from the now occupied Volnovakha – his elderly mother and his sisters with their families. His brother, Ivan Shmitko, wrote on social media that he had worked in agribusiness for more than 17 years and, together with his wife, had established their first home shortly before the full-scale invasion. After 24 February 2022, they and their family left for the EU, and the house became a refuge for his relatives[339]. The head of the detective unit believes that these actions were intended to intimidate members of his family because of his professional activities.

Appearing for questioning as a witness before the SBI on 23 June 2025, Valentyn Shmitko gave evidence regarding the townhouse and the payment for the medical operation in the United States, and submitted copies of the relevant documents. During the interview, he was informed that SBI investigators and

337 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 209: https://zakon.rada.gov.ua/laws/show/2341-14#Text

338 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 368-5: https://zakon.rada.gov.ua/laws/show/2341-14#Text

339 "When the Law Exists for Appearances Rather Than Justice", Ivan Shmitko Facebook page, 23 July 2025: https://www.facebook.com/share/p/19jqy1SWvT/

OPG prosecutors had prepared draft notices of suspicion together with motions seeking a preventive measure in the form of bail set at UAH 10 million and his suspension from office. Although Shmitko was never notified of suspicion and the motions were never filed, he regarded being informed of these preparations as a form of pressure.

According to Shmitko, OPG prosecutors changed the body responsible for the pre-trial investigation several times in these criminal proceedings: first from the Main Investigative Department of the SBI to the Regional Department of the SBI, and later, in August 2025, to the Main Investigative Department of the SSU (the criminal proceedings had originally been opened on the basis of materials provided by the SSU). At the same time, he received neither court rulings authorising the seizure of the seized property nor copies of court rulings granting retrospective authorisation of the searches.

On 25 November 2025, Shmitko filed an application with the Pecherskyi District Court of Kyiv seeking access to the case file concerning the urgent search, but his request was refused.

The NABU official submitted numerous motions to the SBI, the SSU, and the OPG seeking the return of temporarily seized property. On 26 December 2025, the Shevchenkivskyi District Court of Kyiv ordered that the property be returned, but it was not returned. On 29 January 2026, his lawyer applied to the SBI, the SSU, and the OPG, requesting that they comply with the court's ruling. In March, the court resubmitted the full text of the ruling to those authorities.

In the case of **Roman Niedov**, Deputy Head of a NABU detective unit, the searches were likewise preceded by a spring media campaign alleging that he had unlawfully acquired property and registered it in the name of his wife's mother. Niedov links those publications to the criminal proceedings that he headed as lead investigator.

On 21 July 2025, a search was conducted at Roman Niedov's residence in Kyiv without an investigating judge's warrant. It involved SBI investigator O. D. Kramskyi, four SSU officers, six officers of the CSO "A" of the SSU armed with assault rifles, an expert from the Institute of Special Equipment and Forensic Expertise, and two women attesting witnesses. According to Niedov, at around 5:40 a.m., there was loud banging on the door of his apartment. When he asked who was outside, those at the door demanded that he open it but did not immediately identify themselves. After they showed their official identification cards, the NABU official opened the door and saw six fully equipped special forces officers. They pointed their weapons at him and ordered him to leave the apartment and lie on the floor, threatening him with physical violence while using obscene language.

According to Roman Niedov, he raised his hands to show that he was unarmed and posed no threat. This was also evident from the fact that he was wearing only shorts and a T-shirt. Despite this, he was forced to leave the apartment and lie face down on the floor in the communal corridor with his hands behind his back. Several special forces officers stood around him with their assault rifles pointed at him. While he was in the corridor, the law enforcement officers entered the apartment without the presence of the attesting witnesses and without video recording. His wife, underage daughter, and mother were shocked by what was happening.

According to Liia Niedova, the wife of the NABU official, she and their daughter were also ordered to leave the apartment and go into the entrance hall. When their daughter saw her father lying on the floor with his hands behind his head while men armed with assault rifles stood over him, she suffered a hysterical episode. Liia Niedova also stated that the law enforcement officers behaved brutally, threatening her husband with physical violence without any justified grounds. Niedov himself described the manner in which the search was conducted and the use of force as humiliating and disproportionate. In his view, neither was justified by the nature of the potential suspicion (of which he had not been informed) nor by the circumstances in which the investigative (search) action was carried out.

Later, when Roman Niedov was allowed back into the apartment, he indicated where the items and documents requested by the investigator were located. Despite this, the investigator decided to continue the search. As a result, the officers seized documents relating to real estate and a vehicle, his mobile phone containing official information, his wife's mobile phone containing correspondence with patients protected by medical confidentiality as well as information used for her business, the laptop used by their daughter, and both his and his wife's smartwatches. As the investigator stated on the video recording, the laptop was seized because USB flash drives had been connected to it. Niedov, however, noted that the investigator was unable to explain what evidential value, if any, this fact had.

The Deputy Head of the NABU detective unit maintains that neither the corpus delicti nor the underlying criminal event exists in this case. The property under investigation was purchased by his wife's parents (before 26 February 2019[340]) and subsequently gifted to her. Their official income, as reflected in the state registers, exceeded by several times the amount required for the purchase. He and his wife, who works as a dentist, also have officially declared income. The seized mobile phones, smartwatches, and the replacement hard drive installed in the laptop were all acquired after the property that is the subject of the criminal proceedings and, in his view, have no direct connection to the case.

The searches had a negative impact on the entire Niedov family. According to the NABU official, after the stress they experienced, their daughter became afraid to go outside on her own and wakes up at the slightest noise in the communal corridor. His wife is anxious about the possibility of further searches, while his mother's chronic health conditions have worsened. As for himself, he stated that the search damaged his professional reputation, while the seizure of his mobile phone created a risk of unauthorised access to information relating to the investigations conducted by his unit and to his official contacts.

Niedov filed a motion seeking to participate in the court hearing on the application for the seizure of the seized property, but it remained unanswered. An SBI investigator questioned the Deputy Head of the NABU detective unit on 24 July 2025. During the following months, no further procedural or investigative (search) actions were carried out in relation to him or members of his family.

Roman Niedov also stated that investigators searched an apartment owned by his wife and rented by NABU Senior Detective **Mykhailo Cherviakov**. In Niedov's view, those actions were unfounded because the property had been acquired in 2017 and 2018, and neither he nor any member of his family had known Cherviakov before January 2022, when the latter began working at the Bureau.

On 21 July 2025, Mykhailo Cherviakov was at home in Kyiv when, at around 5:30 a.m., during an air raid alert, someone first rang the doorbell and then began banging loudly on the apartment door. According to Cherviakov, the people outside identified themselves as being from the SSU and demanded that he open the door. After he complied, three men armed with assault rifles, wearing uniforms with SSU insignia and face masks, forced their way into the apartment, pushing the detective aside. They were followed by two other individuals who later showed SSU identification cards. At their request, Cherviakov presented his Ukrainian passport and explained that he was renting the apartment. When he asked whether they had an investigating judge's warrant authorising the search, the SSU officers replied that the search had not yet begun and immediately demanded that he hand over his mobile phone. Cherviakov noted that, in his view, the very act of entering the dwelling already constituted the beginning of the search.

The apartment was then entered by Serhii Zhhiblov, an investigator of the Main Investigative Department of the SBI, who presented his official identification and informed Cherviakov that an urgent search was being conducted without an investigating judge's warrant in connection with criminal proceedings concerning money laundering[341], and illicit enrichment[342]. As grounds for the urgent search, the investigator cited the need to preserve property and pursue persons suspected of committing a criminal offence. According to Cherviakov, neither the SSU officers nor the SBI investigator were able to specify what property they were seeking to preserve or which persons they were pursuing. The detective pointed out that he was the only person present in the apartment and that there had been sufficient time to apply to an investigating judge for a search warrant, given that the criminal proceedings had been registered on 9 July 2025.

The investigator stated that the search was being video recorded and invited an elderly woman and an elderly man to act as attesting witnesses. The law enforcement officers asked Cherviakov where he worked, but the detective refused to answer without a lawyer present. The investigator stated that the purpose of the search was to locate documents relating to Niedov's acquisition of ownership of movable and immovable property. When Cherviakov clarified that the only relevant document he

340 Date on Which the Constitutional Court of Ukraine Declared Article 368-2 of the CC of Ukraine Unconstitutional.

341 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 209(3): https://zakon.rada.gov.ua/laws/show/2341-14#Text

342 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 368-5: https://zakon.rada.gov.ua/laws/show/2341-14#Text

could provide was the tenancy agreement, Zhhiblov replied that they would come to that later and instead began examining his personal belongings, including a bag containing his wallet, keys, and documents, rather than inspecting the documents that had supposedly been the object of the search. The detective considers this to demonstrate that the urgent search lacked any genuine basis, since his personal belongings could not have contained such information. He also questioned the need to "preserve" documents of that kind, noting that they are normally executed in several copies, one of which is retained by the notary, while the relevant information is also recorded in the state registers.

After the investigator noticed Cherviakov's NABU employee identification card among his belongings, he read out the details on camera and showed the card to the SSU officers. According to Cherviakov, from that moment onwards the SSU officers became "more actively" involved in the search: separately from the SBI investigator, they examined his family's belongings and photographed documents and other items using their personal mobile phones.

Cherviakov stated that the SSU seized his mobile phones and aggressively demanded that he restore the data stored on them. He refused, explaining that he wished to exercise his right to legal assistance from a lawyer. During the examination of his laptop, Cherviakov stated that it contained no information relating to Niedov's property or that of his family and unlocked it for inspection by the investigator. According to the detective, however, the laptop was in fact examined by an SSU officer. It was also the SSU officers who examined the information stored on his desktop computer.

The detective stated that he switched off the router after noticing attempts to download data during the examination of his electronic devices, for which he was reprimanded for allegedly obstructing the search. According to Mykhailo Cherviakov, the officers then used a "mobile hotspot" to connect to the internet, which, in his view, may have enabled further downloading of data. He noted that he was physically unable to monitor the actions of all the law enforcement officers and believes that the examination of his mobile phones and computer equipment did not correspond to the stated purpose of the search.

After examining the electronic devices, the SBI investigator confirmed on video that they contained no data of interest to the investigation. However, according to Cherviakov, after *"whispering with the SSU officers"*, the investigator decided to seize the laptop and data storage devices without providing any reasons for doing so. The search record stated that they were being seized for examination *"for the presence of prohibited files"*, without specifying what files were meant or in what sense they were considered prohibited.

The detective stated that throughout the search the law enforcement officers continuously used their mobile phones: they exchanged messages, photographed and forwarded documents and other items, and corresponded with one another before deciding whether to seize particular property. They refused Cherviakov's proposal to copy any information they required without seizing the equipment, as provided for by the CPC of Ukraine[343]. In his view, this demonstrates that the investigator exceeded his powers without lawful justification.

The investigator seized three mobile phones (one of which was old and would not switch on at all) together with their SIM cards, explaining that this was necessary in order to "link" the SIM cards to the devices, without clarifying what exactly he meant. He also seized three data storage devices from the desktop computer, as well as the tenancy agreement and utility bills. Because his equipment was seized, Cherviakov had to purchase a new mobile phone on credit, resulting in unexpected expenses that affected the financial well-being of his family with three children, as well as the loss of personal data, digital documents, and access to online services. He further stated that the seized laptop contained materials relating to international cooperation with the anti-corruption authorities of partner countries, the disclosure of which could have adverse consequences by revealing the forms and methods of such cooperation.

At approximately 2:18 p.m., a specialist from the SSU Institute of Special Equipment and Forensic Expertise arrived at the apartment and photographed the rooms for the purpose of a subsequent valuation examination. The detective stated that, after the search had effectively been completed and its stated objective – the "preservation of property" – had been achieved, the investigator nevertheless

343 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 168(2): https://zakon.rada.gov.ua/laws/show/4651-17#Text

continued the search until the specialist arrived. In his view, this was incompatible with the purpose of an urgent search, which cannot be to facilitate an expert examination, and demonstrates that the search had been planned in advance. The search concluded at approximately 3:00 p.m.

After the search had concluded, the investigator informed Mykhailo Cherviakov that he intended to question him as a witness. When Cherviakov objected that questioning him in the apartment where he lived, without his consent and without first summoning him to the pre-trial investigation authority, was contrary to the CPC of Ukraine[344], the investigator did not respond. The SBI investigator remained in the apartment, switched on the video camera, and began drawing up a witness interview record. When the detective stated that he did not consent to investigative (search) actions being carried out in his home, the investigator recorded this statement in the protocol and invited him to sign it. Cherviakov refused, considering this to be a violation of his rights.

The detective considers the search conducted at his home without an investigating judge's warrant to have been unlawful and believes that the actions of the SBI investigators and SSU officers were unrelated to the pre-trial investigation, but were instead intended to exert pressure on NABU employees because of their official duties.

Cherviakov applied to the Pecherskyi District Court of Kyiv seeking to participate in the hearing on the application for authorisation of the search of his home. The court replied that his participation was not provided for by law and that the investigating judge had issued a ruling authorising the search. Cherviakov, however, never received a copy of that ruling. Instead, he learned of its existence from the response of an SSU investigator to his request for the return of the seized property. According to Cherviakov, the response stated that the property could not be returned because an investigating judge had authorised its seizure.

At the end of December 2025, Cherviakov filed a motion seeking the return of the seized property. In response, Oleksandr Hanilov, OPG prosecutor, informed him that the motion had been dismissed. The detective appealed the refusal to the Shevchenkivskyi District Court of Kyiv. The hearing was initially scheduled for 2 February 2026 before Judge Olena Chaika, but it was adjourned three times – most recently until 26 March 2026. The hearing, however, did not take place because the judge was ill.

At approximately 5:30 a.m. on 21 July 2025, **Mykhailo Romaniuk**, Head of a NABU detective unit, woke up because of loud voices outside. After hearing the sound of the magnetic metal entrance door to the apartment building being forced open and the footsteps of a large number of people running up the stairs, he assumed that law enforcement officers had arrived to carry out investigative (search) actions. When they reached his apartment, he opened the door and invited them inside. Three SSU officers and Viacheslav Yeroshkin, SBI investigator, entered the apartment, accompanied by two elderly women acting as attesting witnesses. According to Romaniuk, at least three officers from the CSO "A" of the SSU, wearing face masks, helmets fitted with cameras, body armour, and carrying assault rifles, also attempted to enter the apartment but ultimately remained in the corridor outside.

The SBI investigator informed Romaniuk that a search would be conducted in the apartment as part of criminal proceedings concerning illicit enrichment[345] and money laundering[346]. The search was carried out without an investigating judge's warrant, allegedly for the purpose of the "urgent preservation of property", although the investigator was unable to explain what property he was referring to. Nor was he able to answer Romaniuk's follow-up questions.

During the search, Romaniuk's wife, daughter, and mother were present in the apartment. Romaniuk handed over his own and his wife's mobile phones, as well as documents relating to the purchase of the apartment in 2024, including the mortgage agreement. According to Romaniuk, both the down payment and his family's savings had been declared in his NACP asset declaration. An SSU specialist also took part in the search, photographing the apartment for the purpose of conducting a subsequent property valuation and construction assessment. Romaniuk considers this to be evidence that the search had been planned in advance by the investigator and that the investigator exceeded

344 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 224(1): https://zakon.rada.gov.ua/laws/show/4651-17#Text

345 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 368-5: https://zakon.rada.gov.ua/laws/show/2341-14#Text

346 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 209(3): https://zakon.rada.gov.ua/laws/show/2341-14#Text

his powers. He explained that an urgent search may be conducted only for the purpose of preserving property – not to facilitate the preparation of an expert examination.

In addition to the apartment, searches were conducted of the vehicle used by the family, which is owned by Romaniuk's father, as well as of a plot of land and an unfinished building located on it in Bucha, both of which belong to his parents.

As a result of the searches, the officers seized the NABU official's mobile phone, his wife's mobile phone and laptop, the family's cash savings, documents relating to the purchase of the apartment with a mortgage, payment receipts, and documents concerning the purchase of concrete and windows in 2023.

On 20 October 2025, searches were carried out at the homes of Romaniuk's parents and his wife's parents at their respective places of residence – in a settlement in the Volyn region and a settlement in the Odesa region. The searches were authorised by a ruling of the Shevchenkivskyi District Court of Kyiv dated 1 October 2025. The NABU official considers the approach taken by the investigating judge who authorised the searches to have been biased. In his view, the descriptive part of the ruling contains inaccurate information. In particular, it refers to his parents' ownership of an apartment in Irpin – whereas, according to Romaniuk, they sold it in December 2024. In addition, the ruling alleges that his mother was merely the nominal owner of certain real estate and refers only to her income, while omitting his father's officially declared income, even though it is publicly available in NACP asset declarations. As a result of the searches, the mobile phones of Mykhailo's parents and of his wife's mother were seized after they had voluntarily provided both the devices and their access passcodes.

Mykhailo Romaniuk is convinced that the urgent searches conducted at his home and those of his relatives were intended to intimidate him and exert psychological pressure in order to obstruct NABU investigations. He believes that their purpose was to obtain personal, official, and confidential information relating to ongoing criminal investigations, including the identities of covert witnesses and confidential informants. The NABU official maintains that neither the criminal act nor the constituent elements of any criminal offence exist in this case, as the property in question was acquired using lawfully obtained funds, information about which has been publicly available in NACP asset declarations for 2016–2024.

The Head of the NABU detective unit submitted numerous motions – seeking copies of the court rulings authorising the searches conducted on 21 July 2025, the seizure and return of property removed during the searches, access to the materials of the criminal proceedings, review of the failure to comply with the reasonable time requirement in considering his motions and the inaction of investigators and prosecutors, as well as verification of the lawfulness of the acquisition of real estate and receipt of income by him and his relatives – but most of them were either left unexamined or dismissed[347].

Between October and December 2025, the Shevchenkivskyi District Court of Kyiv ordered an OPG prosecutor to examine several of his complaints, including those concerning the return of temporarily seized property, access to the materials of the criminal proceedings, and the conduct of investigative (search) actions, which he had submitted on 28 August 2025, as well as his complaint of 6 October 2025 concerning the prosecutors' and investigators' failure to comply with the reasonable time requirement in the criminal proceedings.

Romaniuk's request for the return of the seized property was ultimately refused. The only complaints that were upheld concerned the prosecutor's failure to consider his motion and the failure of a senior prosecutor to consider his complaint alleging that the prosecutor had breached the reasonable time requirement.

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As of May 2026, the criminal proceedings concerning illicit enrichment and money laundering involving **Valentyn Shmitko**, **Roman Niedov**, and **Mykhailo Romaniuk** remain ongoing. None of them has been notified of suspicion of committing any criminal offence. According to the NABU officials, they have not been aware of any procedural actions in the proceedings since autumn 2025.

347 See, in particular: Ruling of the Pecherskyi District Court of Kyiv of 12 September 2025 in Case No. 757/44497/25: https://reyestr.court.gov.ua/Review/130205002

SUMMARY OF ALL DOCUMENTED CASES

An analysis of the 29 documented cases involving the prosecution of anti-corruption actors and persons associated with them through criminal proceedings involving the use of procedural coercive measures leads to the following conclusions.

1. The investigative (search) actions were carried out in connection with suspicions of "evasion of military service" and "fraud" (the case of **Vitaliy Shabunin**), "preparation for aiding and abetting the aggressor state" (the case of **Ruslan Mahamedrasulov** and his father, **Sentiabr Mahomedrasulov**), "abuse of influence" (the case of **Ruslan Mahamedrasulov**), "high treason" and "unauthorised handling of classified information" (the case of **Viktor Husarov**), road traffic accidents in 2021 and 2023 (involving **Yevhen Tokar**, **Maksym Sinchuk**, and **Anton Oliinyk**), as well as "false asset declarations" (the case of **Vitalii Tiebiekin**).

2. The Pecherskyi District Court of Kyiv imposed pre-trial detention without the possibility of bail on **Ruslan Mahamedrasulov** and **Sentiabr Mahomedrasulov**. The Shevchenkivskyi District Court of Kyiv imposed the same preventive measure on **Viktor Husarov**. All three remained in the Kyiv SIZO until December 2025. In all other cases, the relevant decisions were issued by the Pecherskyi District Court of Kyiv. **Yevhen Tokar** and **Maksym Sinchuk** were placed under night-time house arrest, while **Anton Oliinyk** was placed under a personal recognisance measure; all three were also suspended from their positions. None of these measures remains in force. **Vitalii Tiebiekin** was suspended from office for two months and ordered to post bail of more than UAH 2.9 million, which the Kyiv Court of Appeal reduced to UAH 45,000 in December. **Vitaliy Shabunin** was placed under a personal recognisance measure, which remained in force until November 2025.

3. As part of the criminal proceedings against Ruslan Mahamedrasulov, searches were also carried out at the home of **Denys Hiulmahomedov**, the First Deputy Director of NABU. **Yusuf Mameshev**, a witness in the case whose testimony contradicts the prosecution's version of events, was notified of suspicion of "knowingly giving false testimony". Criminal proceedings were also initiated against NABU detective **Volodymyr Vasylchuk**, who had interviewed that witness, allegedly on suspicion of obstructing the activities of the AFU.

4. As of May 2026, several cases had already been concluded. The criminal proceedings against **Viktor Husarov** on suspicion of high treason were closed due to insufficient evidence of his involvement, while **Anton Oliinyk** was released from criminal liability. The Shevchenkivskyi District Court of Kyiv acquitted **Yusuf Mameshev**, although the prosecution announced its intention to appeal the judgment. In the cases of **Ruslan Mahamedrasulov** and **Vitalii Tiebiekin**, the defence continues to review the materials of the criminal proceedings. The trials of **Yevhen Tokar** and **Maksym Sinchuk** remain ongoing, while the case against **Vitaliy Shabunin** is at the stage of the preparatory court hearing.

5. Investigative (search) actions were also carried out against NABU employees without any notification of suspicion in connection with the alleged concealment of the Russian citizenship of close relatives (**Kostiantyn Polkin**, **Oleksii Diadenko**, **Oleksandr Usov**, **Eduard Smirnov**, **Ivan Kravchuk**, **Yurii Tsvietkov**, and **Vitalii Tiebiekin**); the alleged facilitation of Hennadii Boholiubov's unlawful departure from Ukraine (**Oleksandr Skomarov**, **Dmytro Atamanchuk**, and **Illia Statura**); and alleged illicit enrichment and money laundering (**Valentyn Shmitko**, **Mykhailo Romaniuk**, and **Roman Niedov**, as well as at the apartment owned by Niedov's wife and rented by **Mykhailo Cherviakov**).

6. Of the nine NABU employees whose security clearance was revoked, six had it reinstated: **Kostiantyn Polkin**, **Oleksii Diadenko**, **Oleksandr Usov**, **Eduard Smirnov**, **Ivan Kravchuk**, and **Yurii Tsvietkov**. As of May 2026, the vetting process concerning the remaining three was still ongoing.

7. As part of the criminal proceedings concerning Fedir Khrystenko, Member of Parliament, searches were carried out at least at the homes of **Oleksandr Rykovtsev** and **Taras Likunov**, former NABU detectives who now work in the Corporate Security Department of Ukrzaliznytsia. Searches were also conducted at the homes of two other deputies of Rykovtsev – **Bohdan Brovko** and **Serhii**

Medetskyi. The search of Taras Likunov also placed pressure on his sister – **Olena Shcherban**, an anti-corruption activist and lawyer for Ruslan Mahamedrasulov. References to Khrystenko also appear in other cases: he allegedly helped organise Hennadii Boholiubov's departure from Ukraine, while some senior officials of the National Bureau, including **Ruslan Mahamedrasulov** and **Oleksandr Skomarov**, who remained in office until the end of 2025, were accused of maintaining close contacts with him. **Denys Hiulmahomedov** was also checked for possible cooperation with Khrystenko.

8. During the searches, law enforcement officers seized electronic devices and data storage media belonging to anti-corruption actors as well as to their family members, including young children. According to Human Rights Centre ZMINA, as of May 2026, the seized property had been returned only to **Yevhen Tokar** and **Ivan Kravchuk**; almost all of it had been returned to **Ruslan Mahamedrasulov** (except for his mobile phones and ammunition); and part of it had been returned to **Viktor Husarov** (his family's funds) and to the relatives of **Vitalii Tiebiekin** and **Vitaliy Shabunin**.

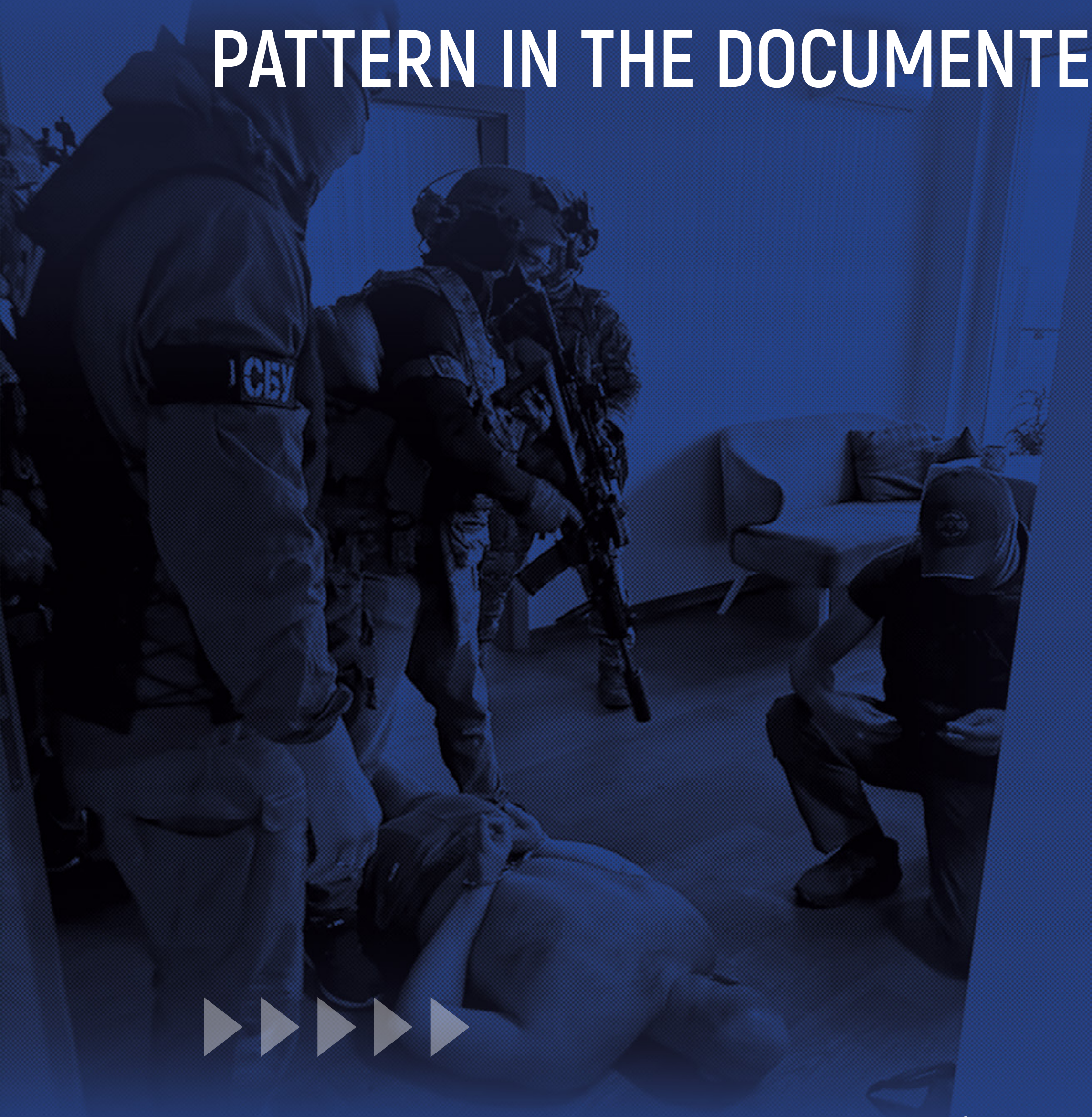
9. In nine cases, investigative (search) actions were accompanied by the disproportionate use of force during procedural actions, In nine cases, investigative (search) actions were accompanied by the disproportionate use of force during procedural actions, including against **Ruslan Mahamedrasulov**, **Viktor Husarov**, **Oleksii Diadenko**, **Ivan Kravchuk** and his wife **Antonina Kravchuk**, **Yurii Tsvietkov**, and **Roman Niedov**. The documented actions included beatings, the use of handcuffs and plastic cable ties, forcible restraint, and restrictions on movement. At least three National Bureau employees – **Ruslan Mahamedrasulov**, **Ivan Kravchuk**, and **Yurii Tsvietkov** – filed complaints with the SBI concerning the excessive use of force and physical coercion. However, as of May 2026, there was no information that anyone had been held accountable.

10. Property was damaged in three cases. In **Yevhen Tokar**'s case, law enforcement officers broke the entrance door shared by two apartments. In **Oleksandr Usov**'s case, they damaged the door of the apartment from which his family had already moved. In **Eduard Smirnov**'s case, they damaged the entrance door shared by several apartments in the building, although no search was conducted at his home.

Search of NABU detective unit head Ruslan Mahamedrasulov, 21 July 2025. Photo credit: hromadske

CHAPTER 2.

IDENTIFYING ELEMENTS OF PRESSURE AND INDICATORS OF A SYSTEMIC PATTERN IN THE DOCUMENTED CASES



Searches conducted without court warrants, the initiation of criminal proceedings, checks into alleged links with the Russian Federation, and the revival of years-old investigations, including those relating to road traffic accidents, were all directed against individuals engaged in anti-corruption work within a relatively short period. The information collected indicates that these actions were not isolated incidents. Rather, they form part of a series of cases in which similar procedural tools and legal grounds were employed. The concentration of these events raises questions about their nature – whether they represent isolated procedural decisions or a practice displaying signs of a coordinated effort to exert pressure on anti-corruption actors.

The purpose of this chapter is to move beyond describing individual cases and towards a comparative analysis based on the information collected. The analysis is based on a systematic review of the documented cases, making it possible to assess not only the substance of individual procedural actions but also their recurrence, scale, and consequences. It first examines whether these cases contain indicators of pressure on individuals engaged in anti-corruption activities. It then assesses whether they share common characteristics that may point to the use of similar instruments, comparable legal approaches, and the emergence of a consistent pattern of practice.

For the purposes of this study, pressure on anti-corruption actors refers to actions or omissions by public authorities, public officials, or other actors that, through criminal procedural, administrative, informational, or other means of influence, seek to alter or restrict the work of individuals engaged in anti-corruption activities. Such pressure may manifest itself, in particular, through the use of procedural measures that result in adverse legal, professional, or personal consequences for those individuals, restrict their rights and freedoms, or create a chilling effect on their future anti-corruption work.

The analysis covers both the procedural actions undertaken by law enforcement authorities themselves – including the manner and timing of searches, the legal grounds on which they were conducted, the use of the urgent search procedure, the seizure of electronic devices and documents, and access to judicial oversight – and the surrounding factors. These include public statements by public officials, the broader information environment, and legislative and institutional initiatives that may have affected the work of anti-corruption institutions.

The documented cases are examined in relation to one another as events that occurred during the same period and within a common institutional context. A synthesis of the information indicates that the same or similar procedural patterns were applied to different individuals, including searches, the seizure of property, and the opening of criminal proceedings on similar legal grounds. This makes it possible to assess whether such actions display a recurring pattern and whether they produce comparable consequences for the work of anti-corruption actors.

For the purposes of this study, systemicity refers to the presence of a combination of features that go beyond individual cases and point to the repeated use of similar instruments of influence, the temporal concentration of events, similarities in legal characterisations, a uniform pattern of procedural actions, and their targeting of individuals engaged in exposing corruption, particularly high-level corruption.

The concept of systemicity adopted in this study is consistent with the approach of the ECtHR. First, it reflects the Court's case law on systemic (structural) problems, under which a violation is regarded as systemic where it stems not from the circumstances of an individual case but from a common underlying cause capable of generating a series of similar cases[348]. Secondly, it is consistent with the Court's case law under Article 18 of the ECHR, which makes it possible to establish that formally lawful restrictions of rights were applied for a concealed purpose not permitted by the Convention[349]. In that case law, the Court has developed the "predominant purpose" test and has recognised the repeated use of targeted measures against an individual as an important factor in such an assessment[350]. A similar approach has also been applied in cases concerning Ukraine[351].

The following criteria are used to assess the presence of indicators of a systemic pattern:

1. Temporal concentration of events – whether procedural actions against different individuals occur within a short period and whether their timing suggests possible coordination;

2. Homogeneity of the targeted group – whether these actions are directed at individuals engaged in anti-corruption activities;

348 Rules of Court, Rule 61, European Court of Human Rights (ECHR), 15 September 2025: https://www.echr.coe.int/documents/d/echr/rules_court_eng

349 Case of Merabishvili v. Georgia, Application no. 72508/13, Judgment (Grand Chamber, ECtHR), 28 November 2017: https://hudoc.echr.coe.int/eng?i=001-178753

350 Guide on Article 18 of the European Convention on Human Rights, §§ 54–55, European Court of Human Rights (ECHR), Updated on 28 February 2026: https://ks.echr.coe.int/documents/d/echr-ks/guide_art_18_eng

351 Case of Lutsenko v. Ukraine, Application no. 6492/11, Judgment (ECtHR), 3 July 2012: https://hudoc.echr.coe.int/eng?i=001-192469

3. Repetition of procedural tools – whether the same mechanisms are used, such as searches conducted without judicial authorisation, the initiation of criminal proceedings, the reopening of old cases, or the seizure of electronic devices;
4. Similarity of legal grounds – whether similar legal characterisations are relied upon to justify such actions;
5. Accompanying actions and the information environment – whether these actions are accompanied by public statements or other measures affecting the anti-corruption sector;
6. Similarity of consequences – whether these actions result in comparable outcomes, including restrictions on professional activities, the seizure of work-related materials, or impediments to the functioning of anti-corruption institutions;
7. Multiplicity of unrelated proceedings – whether multiple criminal proceedings involving different factual circumstances and legal characterisations are activated simultaneously against the same group of individuals, without being linked by a common episode, distinguishing the situation from measures taken within a single investigation;
8. A common selection criterion – whether the individuals concerned are linked primarily by their involvement in anti-corruption activities rather than by their role in a specific alleged offence, that is, whether their selection is explained by their function rather than the circumstances of the case;
9. Connection with extra-procedural measures – whether the procedural actions coincide in time with legislative, institutional, or political measures affecting the powers or independence of anti-corruption institutions.

None of the above criteria is sufficient on its own. Coordination, temporal concentration, and the use of similar procedural tools may also be characteristic of a lawful large-scale investigation conducted within a single set of criminal proceedings. A conclusion that the pressure is systemic can be drawn only where these criteria are present in combination – above all, where the measures are directed at individuals because of their anti-corruption activities, where multiple unrelated criminal proceedings are activated simultaneously, and where those proceedings coincide with extra-procedural measures affecting the anti-corruption system.

2.1. INSTRUMENTS DISPLAYING INDICATORS OF PRESSURE ON ANTI-CORRUPTION ACTORS

PROCEDURAL PRESSURE

Across the documented cases, procedural mechanisms were applied according to a recurring pattern. This included conducting searches on the basis of "urgency" without prior authorisation by an investigating judge, gathering information in advance about individuals' movements, carrying out investigative (search) actions simultaneously at multiple locations, seizing electronic devices belonging both to anti-corruption actors and to their relatives, conducting subsequent judicial review of the searches and considering the seizure of property removed during the searches without the participation of the defence, as well as the disproportionate application of preventive measures.

Some of these elements – in particular, gathering information in advance about individuals' movements and conducting searches simultaneously at multiple locations – are, in themselves, typical components of preparation for large-scale investigative operations. In the documented cases, however, they take on a different significance for two reasons. First, the extent of the prior surveillance, which in some instances extended to individuals' private lives, together with the level of preparation, indicates that the pre-trial investigation authorities had sufficient time to apply to an investigating judge through the ordinary procedure. This calls into question the justification for relying on the exceptional procedure of an urgent search. Secondly, these elements were combined with the seizure of electronic devices belonging to persons who had no procedural status in the criminal proceedings and with restrictions on the defence's effective participation in the subsequent judicial review. Taken together, these circumstances go beyond what would ordinarily be expected in preparation for investigative (search) actions.

The recurrence of these elements across different cases indicates the use of a consistent approach to conducting investigative (search) actions. Each of these elements is examined separately below, with a sequential analysis of the use of urgent searches without an investigating judge's warrant, the seizure of property, the features of the subsequent judicial review, and the application of preventive measures.

URGENT SEARCHES WITHOUT A WARRANT

Searches were conducted in 24 of the 29 documented cases. In 20 of those 24 cases, the searches were carried out as "urgent" searches, that is, without prior authorisation by an investigating judge[352]. In most cases, the formal justification for the alleged "urgency" did not identify any specific circumstances demonstrating that it had been impossible to obtain prior judicial authorisation, or was based solely on the need to preserve property.

As a general rule under the CPC of Ukraine, a search of a person's home or other property may be conducted only on the basis of a ruling issued by an investigating judge[353]. This mechanism provides for prior judicial review of whether there are sufficient grounds to interfere with the right to private life and defines the permissible scope of the search. By contrast, an urgent search is an exceptional procedure that is permitted only where circumstances make it impossible to obtain prior judicial authorisation, in particular where there is an immediate risk that evidence will be destroyed or where a suspect is being pursued. In the cases examined, however, this exceptional procedure was used in circumstances where no such indicators of urgency appear to have existed.

The mere duration of criminal proceedings does not, in itself, preclude the need for an urgent search, since the justification for such a search depends not on the length of the investigation but on the existence, at the time the investigative (search) action is carried out, of a genuine risk that evidence will be lost or of other circumstances making it impossible to obtain prior judicial authorisation. In the documented cases, however, no such risk appears to have existed.

First, this follows from the nature of the alleged offences and the evidentiary basis of the cases. In a number of the proceedings, the evidence was predominantly documentary and had already been collected by the time the searches were conducted, reducing the likelihood of its sudden destruction, which is the justification ordinarily relied upon for an urgent search. The case of Yevhen Tokar is illustrative. The "urgent" search was carried out in criminal proceedings relating to a road traffic accident that had occurred in 2021 – approximately four years after the incident – when the relevant circumstances had already been documented and there appears to have been no basis for concluding that the evidence was at imminent risk of destruction.

Secondly, the advance planning and systematic preparation of the investigative (search) actions – including prior surveillance of the individuals concerned and the simultaneous execution of searches at dozens of locations across different regions – indicate that the pre-trial investigation authorities had both sufficient time and the organisational capacity to apply to an investigating judge through the ordinary procedure. The fact that the criminal proceedings had been registered 12–20 days before the searches, and in some cases considerably earlier, further supports this conclusion.

The scale of the investigative (search) actions likewise points to advance planning. According to the findings of this study, 20 individuals were subjected to urgent searches, which covered 39 separate locations. The fact that the number of locations exceeded the number of individuals is explained by the simultaneous execution of searches at multiple addresses connected with the same person, including the homes of their relatives. Of those locations, three were searched on 11 July 2025, while the remaining 36 were searched on 21 July 2025. The searches were carried out simultaneously

352 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 233: https://zakon.rada.gov.ua/laws/show/4651-17#Text

353 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 234: https://zakon.rada.gov.ua/laws/show/4651-17#Text

across different regions of Ukraine and often involved multiple locations associated with the same individual, including residential and non-residential premises as well as vehicles. In the case of **Ruslan Mahamedrasulov**, investigative (search) actions were conducted at four locations, as well as at the homes of his father, mother, and sisters. In the case of **Mykhailo Romaniuk**, searches were conducted at three locations, and in the case of **Valentyn Shmitko**, at three locations, including his brother's place of residence. In 12 cases, searches were carried out at premises where the individuals did not actually reside, including the homes or property of their relatives (parents, parents-in-law, brothers, or sisters). The simultaneous nature of the operations, the large number of locations involved, and the inclusion of relatives' homes all indicate advance planning and a significant level of organisational preparation for the investigative (search) actions.

The timing of these investigative (search) actions also warrants particular attention. The searches conducted on 21 July 2025 began at approximately 5:15–5:45 a.m., immediately after a large-scale overnight missile attack on Kyiv. The simultaneous nature of the operations across different regions, the large number of locations involved, and the early morning timing all indicate that the searches had been planned in advance.

The searches conducted in relation to Vitaliy Shabunin on 11 July 2025 constituted the first documented example of the pattern that was subsequently applied to NABU employees. Its defining features included the use of urgent searches without prior judicial authorisation, restrictions on access to legal counsel, the seizure of digital devices belonging both to the individual concerned and to members of his family, and the conduct of investigative (search) actions at multiple locations. A detailed account of these circumstances is provided in Chapter 1.

On 21 July 2025, simultaneous searches were carried out in relation to at least 19 NABU detectives and persons associated with them. In a number of cases, searches were conducted at multiple locations connected with the same individual, further expanding the scope of the interference.

Taken together, these circumstances indicate that the searches required extensive preparation, coordination, and the deployment of significant resources. This, in turn, calls into question the necessity of relying on the exceptional procedure of an urgent search and suggests that there was sufficient opportunity to obtain prior judicial authorisation through the ordinary procedure.

SEIZURE OF PROPERTY DURING SEARCHES

The seizure of electronic devices was one of the most consistent features of the searches examined in this study. In 19 of the 20 episodes involving urgent searches conducted on 11 July 2025 and 21 July 2025, law enforcement officers seized mobile phones, laptops, and other electronic devices used by anti-corruption actors and their relatives in their daily activities. In a further four search episodes carried out on 25 September 2025 involving former NABU detectives, publicly available sources do not indicate how many electronic devices were seized. Taras Likunov stated that his mobile phones had been seized in one of those cases.

The seizure of electronic devices was not limited to those belonging to the individuals who were the subject of the investigative (search) actions. In at least 14 of the 20 cases involving urgent searches, officers also seized mobile phones, laptops, or tablets belonging to family members who were present in the home during the search. As a result, the consequences of the investigative (search) actions extended to the family members of the individuals whose homes were searched.

In at least 13 of the 20 cases involving urgent searches, the owners of the seized devices expressly stated – or this was apparent from the nature of their positions, particularly as heads of units or detectives – that the devices contained official information. This included materials relating to pre-trial investigations, work-related correspondence, official documents, and information concerning agents and confidential informants. At the same time, the devices also contained a substantial amount of private information, including personal correspondence, photographs, and other personal materials belonging to family members.

For the purposes of this study, the seizure of electronic devices is regarded as a distinct instrument of pressure. It has several immediate consequences. First, it gives law enforcement authorities access to a substantial volume of both professional and private information. Secondly, it effectively deprives individuals of their primary means of communication and work. Thirdly, in the case of employees of anti-corruption institutions, it creates a risk of access to sensitive official materials, including information relating to investigations, whistleblowers, and confidential informants.

The practice of seizing electronic devices was consistent regardless of the grounds on which the search was conducted. According to the testimony of the anti-corruption actors concerned, SSU and SBI officers first demanded access passwords for mobile phones and computer equipment during the searches. In some cases, where individuals refused or attempted to restrict access to official information, threats, psychological pressure, or physical coercion were reportedly used. The devices were then seized regardless of whether the particular device had any apparent connection to the subject matter of the criminal proceedings. This approach was documented both during the searches conducted in relation to Vitaliy Shabunin on 11 July 2025 and during the mass searches of NABU employees on 21 July 2025.

JUDICIAL REVIEW CONDUCTED WITHOUT THE PARTICIPATION OF THE DEFENCE

Conducting judicial review of property seizure without the participation of the individuals concerned constitutes another element of procedural pressure in the documented cases. This practice deprives those individuals of the opportunity to challenge the seizure of their property and to protect their property rights at the stage when the court reviews whether the continued restriction of those rights is justified.

Under the CPC, property may be seized only on the basis of a ruling issued by an investigating judge upon an application by an investigator or prosecutor[354]. The examination of such applications is one of the key procedural mechanisms for protecting property rights and provides individuals with an opportunity to challenge both the grounds for the seizure of their property and the necessity of maintaining that seizure.

In the documented cases, access to this stage of judicial review was restricted. NABU employees and their lawyers were not informed of the date and time of the hearings concerning applications to review the lawfulness of the searches and to authorise the seizure of property removed during the searches. Despite submitting written requests to the Pecherskyi District Court of Kyiv asking to be notified of those hearings and to ensure the participation of the defence, the Bureau's employees were not permitted to take part in the consideration of those matters.

As a result, the applications were considered without the participation of the individuals whose premises had been searched or their lawyers. This deprived them of the opportunity to present their position on the grounds for the searches, the justification for the seizure of their property, and the necessity of authorising the seizure of their electronic devices. Under these circumstances, judicial review was conducted without the participation of the defence, limiting their ability to challenge the lawfulness of the investigative (search) actions and to protect their property rights in respect of the seized property. The issue of compliance with the standard of effective judicial review is examined in greater detail in Chapter 3.

DETENTION AND DEPRIVATION OF LIBERTY

In the cases examined, detention or de facto deprivation of liberty constituted one of the most severe procedural measures employed. Overall, five individuals were deprived of their liberty in the documented episodes, either through formally recorded detention followed by placement in a pre-trial detention facility or through short-term de facto detention without formal procedural registration.

354 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Articles 170–173: https://zakon.rada.gov.ua/laws/show/4651-17#Text

Formal detention in accordance with the CPC was applied to two NABU employees – **Viktor Husarov** and **Ruslan Mahamedrasulov**[355]. They were detained on the day of the mass searches, 21 July 2025, and subsequently transferred to a pre-trial detention facility, where they remained in custody for several months – from July to December 2025 – in criminal proceedings involving serious charges, including high treason and other offences against the foundations of national security. A separate episode concerned the detention of **Sentiabr Mahomedrasulov**, the father of **Ruslan Mahamedrasulov**, Head of a NABU detective unit. Although he is not himself an anti-corruption actor, he became involved in the proceedings as a related person. He was likewise placed in a pre-trial detention facility within the framework of the same criminal proceedings as his son. The involvement of a NABU employee's closest relative in the proceedings, together with the simultaneous detention of both individuals, intensified the pressure by combining criminal prosecution with measures affecting the employee's immediate family.

Alongside the formal detentions, several cases of de facto deprivation of liberty without proper procedural formalisation were documented. For example, **Yurii Tsvietkov**, a Senior NABU Detective, was detained in the car park near his place of residence before the search began. According to his account, physical force was used against him, after which he was forcibly taken to his apartment to ensure his presence during the search. In substance, these actions amounted to short-term detention without formally assigning him any procedural status.

A similar episode occurred in the case of **Illia Statura**, Deputy Head of a NABU detective unit. During the searches, he was kept in a law enforcement vehicle for approximately three hours while officers awaited "a decision from Kyiv" on the next steps. During that period, he was unable to leave the vehicle or move about freely, which in practice amounted to a deprivation of liberty without any formal procedural detention.

NABU employees and their relatives who were remanded in custody were held in pre-trial detention facilities between July and December 2025. Chapter 1 describes the conditions of detention in the Kyiv SIZO in the relevant cases, while the following chapter analyses those conditions from the perspective of compliance with national standards.

According to the defence, **Ruslan Mahamedrasulov** and **Viktor Husarov** were held for prolonged periods in solitary cells at the Kyiv SIZO, in premises with inadequate living and sanitary conditions and with significant restrictions on access to outdoor exercise, ventilation, and adequate medical care. According to the defence and public statements by the NABU leadership, Ruslan Mahamedrasulov and his father, Sentiabr Mahomedrasulov, were held in "absolutely foul-smelling and cold" cells. The latter shared a cell with a person whom the defence describes as a planted witness in the proceedings, further intensifying the sense of pressure[356]. Taken together, these circumstances indicate that deprivation of liberty in the documented cases was accompanied not only by physical isolation but also by detention conditions that heightened the psychological pressure on those detained and their relatives.

USE OF PHYSICAL FORCE DURING INVESTIGATIVE (SEARCH) ACTIONS

Numerous incidents involving the use of physical force against NABU employees and their family members were documented during the investigative (search) actions. The nature of these actions went beyond what was necessary to carry out searches or other investigative (search) actions.

The study documented at least nine cases involving the use of physical force out of the 20 analysed episodes of urgent searches. These actions included punching, pushing, forcing individuals to the ground, the use of pain compliance techniques, the application of handcuffs or plastic cable ties, and prolonged restraint in uncomfortable positions.

In a number of cases, the use of force was directly linked to demands for access to digital devices. Where individuals refused to disclose the passwords to their mobile phones or laptops, the pressure

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355 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 208: https://zakon.rada.gov.ua/laws/show/4651-17#Text

356 "Mahamedrasulov on the Case Against Him: Fabricated Correspondence, Isolation, and His Father's Deteriorating Health", ZMINA, 11 December 2025: https://zmina.info/news/magamedrasulov-pro-spravu-proty-nyogo-pidroblene-lystuvannya-izolyacziya-ta-pogirshennya-zdorovya-batka/

intensified. In the documented episodes, physical force or threats were used specifically to obtain passwords granting access to mobile phones and other data storage devices.

Some cases illustrate the particularly severe nature of these actions. During the search of **Ivan Kravchuk**, Head of a NABU detective unit, officers used plastic cable ties instead of standard handcuffs, causing significantly greater physical pain. In the case of **Yurii Tsvietkov**, law enforcement officers dragged him out of his vehicle by his clothing, arms, and hair, forced his face against a reinforced concrete pillar in the car park, and repeatedly struck him with their hands and feet.

Photographs of the injuries sustained by Viktor Husarov on 21 July 2025 at a checkpoint on the outskirts of Kyiv after he refused to provide the password to his mobile phone to SSU officers before the investigator's arrival.

Photo credit: Olena Storozhuk for ZMINA

In the case of **Viktor Husarov**, he was stopped at a checkpoint, pulled from his vehicle, subjected to physical force, and ordered to disclose the password to his mobile phone. After refusing to provide the password before the investigator arrived, he was struck repeatedly in the face and on the body, as confirmed by the documented bodily injuries.

Ruslan Mahamedrasulov at a closed court hearing in Kyiv on 22 July 2025, at which he was remanded in custody for 60 days. Beside him is his lawyer, Tetiana Okhrimchuk.

Photo credit: Kateryna Farbar for Radio Free Europe/ Radio Liberty

In the case of **Ruslan Mahamedrasulov**, handcuffs were applied during the search without any apparent justification, despite the absence of any resistance on his part. Physical force was then used against him on several occasions, including while officers demanded access to his mobile phone. He states that he remained handcuffed throughout the entire search and sustained bodily injuries, as confirmed by a medical examination.

Physical force was also used against family members of anti-corruption actors. During the search of **Ivan Kravchuk**'s home, for example, physical coercion was used against his wife, **Antonina Kravchuk**, including to force her to unlock her mobile phone using Face ID and to seize the device from her hands.

Taken together, these circumstances indicate that physical force was used as an instrument of pressure during the investigative (search) actions.

PSYCHOLOGICAL PRESSURE, INTIMIDATION, AND PRESSURE ON FAMILY MEMBERS

In addition to physical force, psychological pressure was systematically exerted on NABU employees and their family members during the searches. This pressure was applied through the timing and manner of the investigative (search) actions, threats, degrading treatment, and the involvement of close relatives.

The mass searches carried out on 21 July 2025 began simultaneously at approximately 5:15–5:45 a.m., that is, before 6:00 a.m., across different regions of Ukraine, including Kyiv, Kyiv region, Dnipropetrovsk region, Ivano-Frankivsk region, and Khmelnytskyi region, indicating advance centralised planning. The searches were conducted in private homes, often in the presence of young children and elderly parents, intensifying the sense of a sudden intrusion at a moment of particular vulnerability.

At least **five cases** involving threats or intimidation during searches were documented. Some of the threats concerned physical violence, including statements suggesting that the individual could be "taken to the forest" or that "an accident" could be arranged. Others related to property, with investigators

Photograph of the search conducted on 21 July 2025 at the home of a NABU employee, published by several media outlets

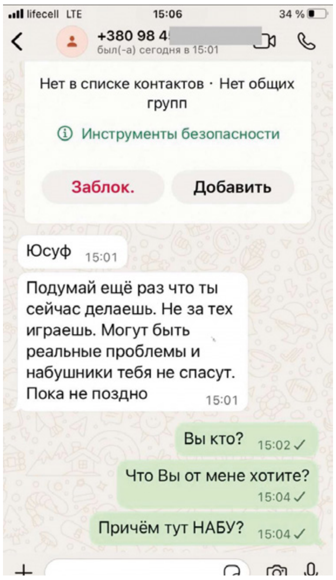
implying that "you'll have to renovate again" after the search.

A characteristic feature of the documented searches was the deployment of a large number of armed officers. In a number of searches, members of the CSO "A" of the SSU were present in full tactical gear, creating the atmosphere of a high-risk law enforcement operation, despite the fact that the individuals concerned – NABU detectives and civil society actors – offered no resistance and were not considered to present a risk of armed confrontation.

Incidents involving degrading treatment were also documented. During the search of **Illia Statura,** for example, he was photographed in his underwear, a measure that went beyond any procedural necessity and further contributed to his humiliation.

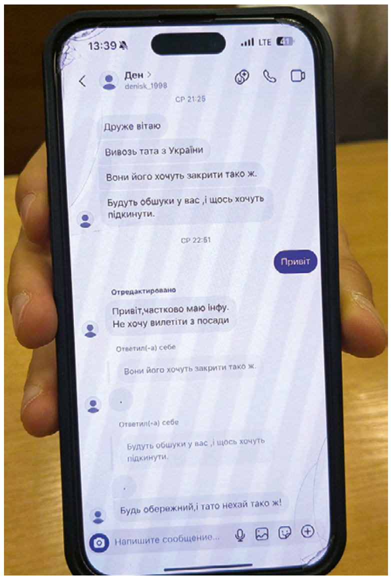
Psychological pressure also extended to the family members of NABU employees. Searches were carried out in the presence of spouses, children, and parents and, in some cases, simultaneously at several addresses belonging to the relatives of the same individual (including the Mahamedrasulov family), with electronic devices belonging to family members seized, including the mobile phones of children and parents. The presence of armed officers in the homes of relatives extended the impact beyond the individual responsibility of the detectives and intensified the overall pressure on their immediate family environment.

A separate incident involving possible degrading treatment during judicial proceedings was also documented. According to the daughter of **Sentiabr Mahomedrasulov**, he was ordered to undress and subjected to a body search before a hearing at the Kyiv Court of Appeal, which she regarded as degrading treatment and a form of psychological pressure on the family. At the same time, the court stated that Mahomedrasulov himself had not complained of any violations during his transfer to the court and that the relevant information had been referred to the prosecution for verification.



Screenshot of a message received by Yusuf Mameshev from an unknown number on 22 September 2025.

Photo credit: Ukrainska Pravda



Message received from an unknown number, shown to the media by Magomed Mameshev in court on 27 October 2025.

Photo credit: Hanna Chekhovych for ZMINA

Another manifestation of pressure concerns its impact on witnesses, particularly in the case of **Yusuf Mameshev**. After Mameshev gave evidence in support of Ruslan Mahamedrasulov, he was allegedly subjected to pressure, which intensified after he approached lawyers with the intention of providing testimony. He began receiving threats and, according to his account, there were also attempts to mobilise him in breach of the established legal procedure. After he gave his testimony, the SSU, SBI, and the prosecution notified him that he was suspected of allegedly giving false testimony – before any judicial assessment of that testimony had taken place. In addition, he was the only witness in the case who underwent a psychological examination after being questioned, and summonses requiring him to appear for questioning were served on him, including immediately before court hearings in the related proceedings.

INFORMATION AND REPUTATIONAL PRESSURE

Alongside the procedural measures and the use of force, the study documented a systematic campaign of information and reputational pressure targeting anti-corruption actors and institutions. This pressure manifested itself in two interconnected dimensions: public statements by law enforcement authorities concerning specific criminal proceedings and a prolonged media campaign conducted through anonymous Telegram channels aimed at discrediting NABU, SAPO, and individuals associated with them.

In July 2025, following the searches conducted on 11 and 21 July, the SSU and the Office of the Prosecutor General emphasised in their public statements and media comments that certain NABU detectives were suspected of “high treason”, “collaboration with the Russian Federation”, and other offences against national security. These statements, primarily linked to the legal qualification under Article 111 of the Criminal Code of Ukraine, were released almost simultaneously with the commencement of the coordinated searches on 21 July 2025, before the completion of the pre-trial investigation and in the absence of any judicial determination on the merits. They were accompanied by footage of the searches and other visual materials, including photographs and videos from the investigative (search) actions[357].

These communications emphasised the most serious criminal charges without due regard for the presumption of innocence or the provisional status of the individuals as suspects. During a joint briefing on 22 July 2025, the Head of the SSU and the Prosecutor General publicly identified by name the NABU detectives under suspicion – Ruslan Mahamedrasulov and Viktor Husarov – linking them to the alleged offences before the completion of the pre-trial investigation and in the absence of any judicial determination on the merits. Combined with the publication of visual materials from the searches, this communication created an impression of established guilt and went beyond merely informing the public about the progress of the investigation.

The case of Ruslan Mahamedrasulov is particularly illustrative. Photographs and video footage from the searches were published in the media and on Telegram channels without concealing either his face or those of his family members, while his full name appeared alongside allegations of “high treason” and “working for the Russian Federation”. The SSU’s official communications disclosed information about both him and his father and effectively alleged that they had organised trade with the Russian Federation, even though the actual notice of suspicion was considerably narrower in scope and contained no such allegations. The disclosure of personal information unrelated to the subject matter of the proceedings, including private communications involving family members, was used to create the impression that they held pro-Russian views, indicating a deliberate effort to construct a negative public image and undermine trust.

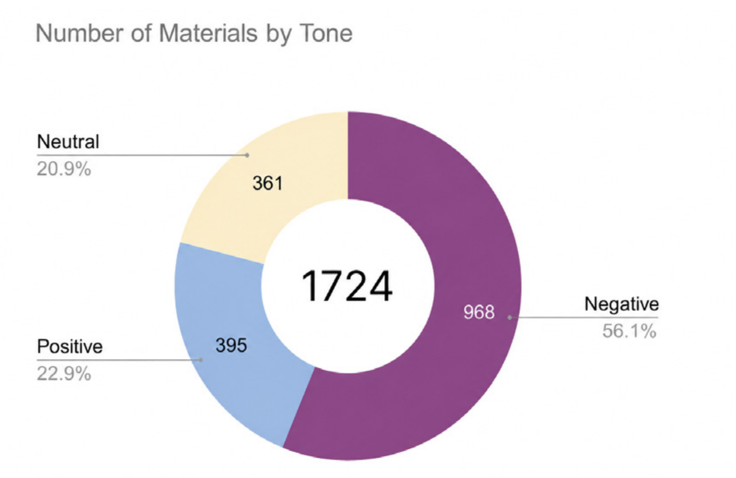
At the same time, a separate study conducted by the People with Cardboards movement[358], found that between 1 February and 11 November 2025, 1,865 posts mentioning NABU were published across the 15 largest news Telegram channels. Of these, 56% were negative in tone and a further 21% were neutral, meaning that positive references constituted only a minority. A total of 886 negative posts, which were not directly related to the positions of the parties in specific criminal cases, formed at least 78 thematic “waves” – coordinated series of similar posts published across different channels. Within these waves, NABU and SAPO were consistently portrayed as institutions with “links to Russia” (268 posts, generating more than 79 million views), as “corrupt” and “ineffective” bodies that “work against the state” and should either be “dismantled” or stripped of their key powers.

The timing of these identified waves correlated with key developments affecting Ukraine’s anti-corruption institutions. The most intensive information attacks occurred on 21–22 July 2025 – the days of the mass searches of NABU employees and the adoption by the Verkhovna Rada of legislative amendments that dismantled the anti-corruption institutional framework. Separate waves were also launched following the road traffic accident involving a NABU detective, public statements by the Anti-Corruption Action Centre, and during the NABU–SAPO “Midas” special operation targeting high-

357 “The SSU and the Office of the Prosecutor General Expose Ruslan Mahamedrasulov, One of the Heads of NABU’s Interregional Detective Units, for Conducting Business in Russia (Official Video Featuring Statements and Footage of the Searches)”, Security Service of Ukraine YouTube channel, 20 July 2025: https://www.youtube.com/watch?v=P3dqg7A3x3U

358 “Media War Against NABU and SAPO. How Top Telegram Channels Are Trying to Destroy the Reputation of Ukraine’s Anti-Corruption Institutions”, Ukrainska Pravda, 14 November 2025: https://www.pravda.com.ua/articles/2025/11/14/8007228/

level corruption in the energy sector. In these instances, genuine news events served as opportunities to reinforce pre-existing negative narratives rather than to provide balanced public information.



Infographics by the "People with Cardboard Signs" movement from an article by Ukrainska Pravda on the media campaign against NABU and SAPO. The charts show the tone of publications about NABU in top Telegram channels, as well as the key negative narratives spread against anti-corruption institutions

A further manifestation of information and reputational pressure was **the use of the ethnic origin** of anti-corruption actors and persons associated with them as a means of discrediting them and creating suspicion. In particular, in the case of Ruslan Mahamedrasulov, the case materials and the actions of the law enforcement authorities indicate an attempt to artificially link him with Denys Hiulmahomedov and the alleged offences on the basis of their shared Dagestani origin. According to Mahamedrasulov, the fact that he had held a work-related meeting with the First Deputy Director of NABU was used as a basis for conducting searches not only of him but also of members of his family. He further states that SSU officers sought to use his ethnic origin as an additional factor to generate suspicion and distrust.

This is further supported by other case materials. Official SSU documents referred to the alleged "close relationship" between Mahamedrasulov and Hiulmahomedov without adequate evidentiary support, while the mere fact of their shared Dagestani origin was effectively used as a basis for combining them within the same criminal proceedings and constructing a link to the Russian Federation. These assertions were not supported by objective evidence, either during the investigation or before the court. The use of ethnic origin as an identifying characteristic fostered prejudice and created an impression of possible disloyalty, thereby facilitating both the public and procedural justification of the suspicions. Ethnic origin was thus used as a means of reinforcing suspicion, a practice that exhibits features of a discriminatory approach.

A similar approach can also be seen in the treatment of the witness Yusuf Mameshev. According to the Anti-Corruption Action Centre, the prosecution argued that because Mameshev was born in Dagestan and had relatives there, his conversation with Mahamedrasulov must have concerned the sale of industrial hemp to that republic of the Russian Federation, despite Mameshev's repeated testimony that the discussion concerned exports to Uzbekistan under the relevant state programme[359]. In these cases, ethnic origin effectively became an evidentiary element, substituting for an assessment of the actual substance of the conversation. Combined with public statements alleging "links to the Russian Federation" and the accompanying information campaigns, this created an additional layer of pressure that went beyond the bounds of legitimate procedural activity and may indicate the use of elements of ethnic stigmatisation in the context of criminal prosecution.

359 "Pecherskyi District Court Imposes a Preventive Measure on a Witness in the Mahamedrasulov Case", Anti-Corruption Action Centre Telegram channel, 19 October 2025: https://t.me/fuckcorruption/4555

The case of Vitaliy Shabunin illustrates an additional dimension of information and reputational pressure. Following the searches conducted on 11 July 2025, the media and anonymous Telegram channels systematically disseminated messages calling into question his integrity and patriotism, particularly by focusing on the criminal proceedings concerning the alleged evasion of military service.[360].

On 16 December 2025, several Telegram channels published his private intimate photographs, which, according to Shabunin[361], originated from the mobile phone seized during the search while it was in the custody of the law enforcement authorities. Following the public outcry, the SBI and the OPG announced internal inquiries into the officials who had access to the device[362]. However, as AntAC and lawyer Olena Shcherban later reported, as of May 2026 no such internal investigation had in fact been initiated. This calls into question whether the announced inquiries were genuine and reinforces concerns that the authorities were unwilling to establish the source of the leak.

The systematic nature of the information and reputational component is demonstrated by its synchronisation with the procedural measures and by the use of similar narratives in relation to different individuals. In this context, information and reputational pressure cannot be regarded as a mere by-product of criminal proceedings. Its recurrence, content, and synchronisation with other measures support its characterisation as a distinct instrument of pressure that complements procedural and coercive mechanisms.

2.2. INDICATORS OF SYSTEMATICITY IN THE DOCUMENTED CASES

The different episodes demonstrate a common underlying logic, a recurring set of instruments, and synchronised actions directed against individuals united by their professional involvement in anti-corruption activities, including investigations, public oversight, and efforts to combat high-level corruption.

INDICATOR I.
TARGETING SPECIFIC GROUPS AND EXPANDING THE CIRCLE OF IMPACT

An analysis of the 29 documented cases shows that the measures were directed at individuals whose professional or civic activities were directly connected with combating corruption or facilitating anti-corruption investigations. The overwhelming majority – 21 cases – concerned **serving NABU employees**, including detectives, senior detectives, and heads of units involved in high-profile investigations concerning senior public officials, members of parliament, heads of central executive authorities, and officials from other law enforcement agencies, including the SSU and the OPG. Some of these investigations involved the highest-ranking state officials or individuals closely associated with them, indicating a targeted impact on the segment of the institution responsible for politically sensitive investigations.

Another group comprised **former NABU detectives** (four cases). The measures against them were taken after they had left the Bureau, yet they targeted individuals who had previously been involved in investigating corruption-related criminal offences, including cases concerning state-owned companies and politically sensitive proceedings. Searches were carried out at the homes of several former detectives who, at the time of the events, were employed by other organisations, including JSC Ukrzaliznytsia, and who remained professionally connected. In a number of cases, these measures were accompanied by information attacks on anonymous Telegram channels. This may indicate a response not only to their previous professional activities within NABU, including their involvement in investigations concerning influential public officials, but also to their ongoing anti-corruption work. In particular, Taras Likunov

360 "The SBI Will Conduct Searches of Vitaliy Shabunin on 11 July, Says the Anti-Corruption Action Centre", Espreso, 10 July 2025: https://espreso.tv/suspilstvo-tspk-zayaviv-pro-obshuki-u-vitaliya-shabunina-za-mistsem-sluzhbi-na-kharkivshchini-y-udoma

361 Vitaliy Shabunin. "The SBI and the OPG Leaked My Intimate Photos from the Phone Seized During the Search to Telegram Channels", Vitaliy Shabunin Facebook page, 16 December 2025: https://www.facebook.com/678864536/posts/10162394152939537/

362 "The State Bureau of Investigation Will Thoroughly Verify Media Reports Concerning the Publication of Private Photographs of One of the Persons Involved in Criminal Proceedings", State Bureau of Investigation, 16 December 2025: https://surl.li/nexuxf

linked the searches to the activities of the Corporate Security Department of JSC Ukrzaliznytsia aimed at detecting and preventing corrupt practices within the company.

A separate group consists of **civil society actors** – Vitaliy Shabunin and Olena Shcherban. Although their status differs from that of NABU detectives, the nature of the measures directed against them – including searches, public statements, and information campaigns – indicates a similar objective: a response to public criticism, oversight of law enforcement agencies, and advocacy in the field of anti-corruption policy. In Olena Shcherban's case, an additional factor was her role as a defence lawyer for Ruslan Mahamedrasulov, Head of a NABU detective unit. At the same time, searches were also conducted at the home of her brother, a former NABU detective, suggesting a combination of factors related both to his professional activities and to family ties.

Another category comprises individuals **associated with anti-corruption actors** who are not themselves directly involved in anti-corruption work. This includes, on the one hand, individuals involved in criminal proceedings, such as Yusuf Mameshev, a witness in the case against Ruslan Mahamedrasulov, and, on the other, close relatives of detectives and activists, such as Sentiabr Mahomedrasulov, the father of a NABU employee. The proceedings against these individuals extend beyond the principle of individual responsibility and demonstrate an expansion of pressure to the family and professional circles surrounding anti-corruption actors.

Accordingly, the common feature of all documented cases is that the measures were directed against individuals who exposed, investigated, or publicly reported on high-level corruption, as well as against those in their immediate personal and professional circles.

INDICATOR II.
TEMPORAL CONCENTRATION OF KEY EVENTS

On 11 July 2025, searches were conducted at the home of Vitaliy Shabunin. Just ten days later, on 21 July 2025, coordinated early-morning searches were carried out at the homes of at least 19 NABU employees and individuals associated with them. On 22 July 2025, the Verkhovna Rada adopted Law No. 12414, which altered the institutional framework governing the anti-corruption bodies. Taken together, these events, occurring within an 11-day period, form a single chronological sequence in which intensive procedural measures against anti-corruption actors coincided with institutional changes affecting Ukraine's anti-corruption policy.

INDICATOR III.
CLUSTERING OF CRIMINAL PROCEEDINGS INTO THREE CATEGORIES AND THEIR SIMULTANEOUS ACTIVATION

Criminal proceedings were initiated in 28 of the 29 documented cases. In total, 30 criminal proceedings were identified across these cases, as some individuals became the subject of more than one set of proceedings.

In 22 cases, the criminal proceedings were initiated during the same period. In a further eight cases, additional proceedings against the same individuals were opened at a later stage, after the investigative (search) actions had already taken place or in the course of the development of other criminal cases.

The documented investigative (search) actions were conducted within the framework of three main categories of criminal proceedings, a significant proportion of which were either registered or rapidly activated shortly before 21 July 2025.

1. **Proceedings concerning offences against the foundations of national security.** In 16 cases[363], the investigative (search) actions were justified on the basis of investigations into offences against the foundations of national security, namely high treason (Article 111 of the CC of Ukraine) and aiding

363 Cases involving NABU employees Viktor Husarov, Ruslan Mahamedrasulov, his father Sentiabr Mahomedrasulov, Denys Hiulmahomedov, Oleksii Diadenko, Ivan Kravchuk, Konstiantyn Polkin, Eduard Smirnov, Vitalii Tiebiekin, Oleksandr Usov, Yurii Tsvietkov, Volodymyr Vasylchuk, as well as former NABU detectives, now employed in corporate security at Ukrainian Railways – Oleksandr Rykovtsev, Taras Likunov, Bohdan Brovko, and Serhii Medetskyi – were taken into account.

the aggressor state (Article 111-2 of the CC of Ukraine). The formal grounds relied upon included the fact that relatives resided in the TOT, possessed Russian Federation identity documents, or had contacts with foreign nationals that the investigation characterised as "links to intelligence services". At the same time, the documented cases reveal no clear connection between these circumstances and any specific conduct capable of posing a threat to Ukraine's national security. This raises doubts as to whether such grounds were sufficient to justify the initiation of criminal proceedings and suggests that family ties were used as one of the instruments of pressure. Significantly, investigative measures against a number of NABU employees accused of concealing the Russian citizenship of close relatives were carried out within the framework of a single criminal proceeding (No. 22025101110000774, opened on 2 July 2025). Despite differences in the underlying factual circumstances and the absence of any apparent common episode or evidentiary subject matter, these cases were consolidated into a single proceeding. This indicates a concentration of procedural measures directed at a particular group of NABU employees and further reinforces the indicator of clustering. It is also noteworthy that this category of proceedings was applied to actions undertaken in the course of official duties. In particular, criminal proceedings were initiated against Volodymyr Vasylchuk, NABU detective, under the provision criminalising obstruction of the lawful activities of the AFU and other military formations because of his efforts to locate witness Yusuf Mameshev and secure his participation in investigative actions[364]. In addition, this category includes the investigative measures carried out against four former NABU detectives in the autumn of 2025 within the criminal proceedings concerning Fedir Khrystenko, Member of Parliament. According to the SSU, Khrystenko was an FSB agent responsible for strengthening Russian influence within NABU. Within the framework of those proceedings, the contacts and connections of both current and former NABU employees were examined, making it appropriate to classify these investigative measures as part of the broader group of national security-related proceedings.

2. **Proceedings concerning official offences and economic crimes.** In six cases[365], the investigative (search) actions were conducted within investigations into alleged trading in influence, illicit enrichment[366], and/or laundering of the proceeds of crime[367]. Most of the episodes concerned assets acquired in previous years, in some instances before the individual concerned had begun working at NABU. Notably, NABU officials Valentyn Shmitko, Roman Niedov, and Mykhailo Romaniuk were included within a single criminal proceeding (No. 42025000000000544, opened on 9 June 2025), despite the differing factual circumstances underlying the respective episodes. This concentration of procedural measures directed at heads of NABU units involved in high-profile corruption investigations further indicates a tendency towards the clustering of criminal proceedings targeting representatives of the anti-corruption institution.

3. **Proceedings concerning ordinary criminal offences and other exceptions.** In eight cases[368], the investigative (search) actions and criminal proceedings were based on allegations of evasion of military service, facilitating the unlawful crossing of the state border, road traffic accidents that occurred between 2021 and 2023, as well as procedural proceedings against a witness (in particular, the case of Yusuf Mameshev, who was alleged to have given false testimony[369]). Some of these proceedings had shown little or no investigative activity for an extended period but were suddenly reactivated on the very day the mass searches were carried out.

The likelihood that criminal proceedings of fundamentally different types – ranging from a 2021 road traffic accident to offences against the foundations of national security – would independently generate a need for "urgent" searches on the very same day appears low. When considered together with the clustering of the proceedings and their simultaneous activation, this may indicate that the investigative (search) actions directed against representatives of the anti-corruption sector were coordinated in nature.

364 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 114-1: https://zakon.rada.gov.ua/laws/show/2341-14#Text

365 Cases involving NABU employees Valentyn Shmitko, Roman Niedov, Mykhailo Romaniuk, Mykhailo Cherviakov, as well as new criminal proceedings against Ruslan Mahamedrasulov and Vitalii Tiebiekin, initiated in September 2025, were taken into account.

366 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 368-5: https://zakon.rada.gov.ua/laws/show/2341-14#Text

367 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 209: https://zakon.rada.gov.ua/laws/show/2341-14#Text

368 Cases involving Vitaliy Shabunin, Chair of the Anti-Corruption Action Centre, NABU employees Illia Statura, Oleksandr Skomarov, Dmytro Atamanchuk, Yevhen Tokar, Maksym Sinchuk, Anton Oliinyk, and Yusuf Mameshev, a witness in the case against Ruslan Mahamedrasulov, were taken into account.

369 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 384: https://zakon.rada.gov.ua/laws/show/2341-14#Text

INDICATOR IV.
USE OF THE SAME SET OF PROCEDURAL MECHANISMS OF PRESSURE: "URGENCY", COORDINATED EARLY-MORNING TIMING, AND SCALE

On 21 July 2025, the searches generally began between 5:30 and 5:45 a.m., when the individuals concerned were at home with their families and were at their most physically and psychologically vulnerable. Several testimonies record the precise timing: 5:30 a.m. (Kostiantyn Polkin, Mykhailo Cherviakov, Oleksii Diadenko) and 5:40–5:45 a.m. (Mykhailo Romaniuk, Denys Hiulmahomedov, and his family). Some of the criminal proceedings in which these searches were conducted had been under investigation for years, with no apparent need for such "urgent" early-morning measures.

INDICATOR V.
A COMMON PRACTICAL OBJECTIVE OF THE SEARCHES: ACCESS TO DIGITAL DATA

In the majority of cases, the first steps taken during the searches were demands for access to mobile phones, laptops, and other computer equipment, followed by the seizure of those devices. For NABU employees, this resulted in the loss of access to devices containing official information, pre-trial investigation materials, work-related correspondence, and information concerning witnesses and confidential informants. The simultaneous seizure of electronic devices from a large number of Bureau employees created risks to both the confidentiality and the effectiveness of ongoing investigations. The long-term risks associated with the seizure of digital devices are illustrated by the case of Vitaliy Shabunin: in December 2025, his private intimate photographs were disseminated from a mobile phone seized during the search. This demonstrated the long-term consequences of losing control over digital devices for both private and professional life and served to further discredit the activist and intensify the pressure against him.

INDICATOR VI.
LIMITED OPPORTUNITIES FOR THE DEFENCE DURING JUDICIAL OVERSIGHT

In the documented cases, the defence reported having only limited opportunities to participate in judicial proceedings concerning the seizure of property. In practice, this meant that the principal consequences of the investigative (search) actions – the seizure of electronic devices, the loss of access to digital data, and the resulting restrictions – had already taken effect before the owners of the property were able to present their position to the court.

INDICATOR VII.
INFORMATION SUPPORT AS A CONTINUATION OF THE PROCEDURAL MEASURES

The investigative (search) actions were accompanied by public statements from the leadership of the SSU and the OPG, using expressions such as "high treason", "trading with the Russian Federation", and "corrupt officials within NABU". Reinforced by videos of the searches and arrests, these statements created a premature public impression of guilt and undermined the legitimacy not only of the individuals concerned but also of NABU as the institution responsible for investigating high-level corruption.

Significantly, some of the search materials were disseminated outside official channels. The first videos and photographs of Ruslan Mahamedrasulov appeared not through the SSU's official communications but on anonymous Telegram channels[370], indicating a likely leak of pre-trial investigation materials by individuals who had access to the case file.

This sequence of events makes it difficult to explain these actions as a legitimate effort to inform the public about the progress of the investigation and instead points to the deliberate use of information for the purpose of discreditation. The information component was synchronised with the coercive measures and functioned as a distinct instrument of pressure.

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370 "Preliminary Reports Suggest Evidence of Informal Influence by Russian Special Services over NABU Detectives", Trukha Ukraina Telegram channel, 21 July 2025 (07:21) https://t.me/truexanewsua/117649; "The SSU and the OPG Detain One of the Heads of NABU's Detective Units on Suspicion of Conducting Business in Russia", Security Service of Ukraine Facebook page, 21 July 2025 (09:46) https://surl.li/ruhqoa

INDICATOR VIII.
SIMILARITY OF CONSEQUENCES ACROSS DIFFERENT LEVELS

1. **Individual level (health, liberty, and reputation).** The application of preventive measures against NABU detectives, including pre-trial detention, resulted in the effective deprivation of liberty without adequate legal justification. Prolonged detention in the Kyiv SIZO was accompanied by a drastic change in living conditions, separation from family members, and additional psychological strain caused by public stigmatisation. Bodily injuries sustained during the searches were also documented, including in the cases of Ruslan Mahamedrasulov, Viktor Husarov, Yurii Tsvietkov, Ivan Kravchuk, and Oleksii Diadenko, further reinforcing feelings of insecurity and vulnerability. Reputational harm was compounded by the public statements described above and, in the case of Vitaliy Shabunin, by the dissemination of private materials taken from his seized mobile phone. Taken together, the searches, the seizure of electronic devices, detention, and the accompanying information campaign created multidimensional pressure on anti-corruption actors and their families.

2. **Professional level (continuity of work).** For NABU employees, the mass searches conducted on 21 July 2025 and the seizure of mobile phones, laptops, and data storage devices resulted in the loss of access to case materials and official communication channels. Simultaneous measures directed against several members of the same unit caused delays in investigations, created a risk of missing procedural deadlines, and required the reassignment of cases. In some instances, these measures were accompanied by the suspension of employees from their positions, limiting their participation in investigations and the work of their units. For civil society actors, the principal professional impact was reputational: attacks on their professional standing complicated their advocacy work, communication with partners and international organisations, and potentially restricted their access to public platforms. Accordingly, the documented measures created risks to the continuity of professional activities and to the proper performance of both official duties and public-interest functions.

3. **Institutional level (pressure on NABU and the anti-corruption sector).** The mass searches, the imposition of preventive measures against individual Bureau employees, the seizure of electronic devices, and the accompanying aggressive information campaign created an atmosphere of internal instability within NABU. The institution responsible for investigating high-level corruption found itself in a situation where its own employees simultaneously became the targets of coercive measures by other law enforcement agencies. This heightened the risk of diminishing trust within the institution, reducing initiative in complex investigations, encouraging self-censorship, and creating fear of making procedural decisions in high-profile cases. At the same time, these measures sent a broader deterrent signal to the anti-corruption sector as a whole. The coordinated searches, accusations under provisions such as high treason, arrests, and information campaigns employing rhetoric about "corrupt officials within NABU" influenced the behaviour of different actors: potential whistleblowers through increased fear of revealing their role or cooperating with investigators; civil society organisations through the risk of reducing the intensity of public criticism and advocacy activities; and detectives and prosecutors through heightened concerns about the personal consequences of making procedural decisions in high-profile cases. The existence of such a chilling effect is also reflected in public statements made by the leadership of Ukraine's anti-corruption institutions. According to Oleksandr Klymenko, Head of SAPO, following the searches one NABU detective withdrew from a sensitive investigation out of concern that he would become the next target, while some whistleblowers suspended their cooperation for fear that their identities would be exposed. Semen Kryvonos, Director of NABU, likewise stated that following the events of July 2025, the Bureau had to undertake dedicated efforts to restore whistleblowers' trust and persuade them to continue cooperating[371]. The close temporal proximity between the searches conducted on 21 July 2025 and the adoption, on 22 July 2025, of Draft Law No. 12414, which altered the system of subordination of Ukraine's anti-corruption bodies, reinforces the perception of a coordinated impact both on the institutional

371 "Semen Kryvonos Explains How the SSU's Searches of NABU Employees Affected Their Investigations", Suspilne News, 1 August 2025: https://suspilne.media/1081119-direktor-nabu-rozpoviv-ak-obsuki-sbu-u-pracivnikiv-buro-vplinuli-na-ihni-rozsliduvanna/; Ukraine still fighting the enemy within, warns anti-corruption chief / The Times, 31 July 2025: https://www.thetimes.com/world/russia-ukraine-war/article/ukraine-anti-corruption-chief-zelensky-r3d9kgmc9

independence of NABU and on the functioning of the anti-corruption sector as a whole. As a result, the consequences extend beyond the individual criminal proceedings and affect the sector's overall ability to fulfil its mandate.

Taken together, the synchronisation and temporal concentration of events, the targeted selection of groups, the expansion of measures to family members and professional circles, the use of the same procedural mechanisms, the indiscriminate seizure of electronic devices, the weakening of judicial oversight, and the parallel information campaign may be viewed as elements of a coordinated process. The recurrence of these elements across different cases, together with their mutually reinforcing effect, supports the conclusion that the interference was systemic in nature, with its principal consequence being the weakening of the anti-corruption sector and the erosion of its public legitimacy.

2.3. DIFFERENCES BETWEEN THE CASES

An analysis of the documented cases does not reveal any systematic differences between the groups of individuals concerned. In the vast majority of cases, the same procedural mechanisms were employed, most notably urgent searches conducted without prior judicial authorisation. Certain differences can nevertheless be observed in the factual circumstances surrounding the investigative (search) actions, but these appear to be case-specific and do not amount to consistent patterns.

In particular, in some cases searches were carried out at multiple locations, including the homes of relatives and other associated premises. However, this practice may be explained by the extent of the property involved or the places where it was actually used and, in itself, does not indicate a distinct approach towards different groups of individuals.

Likewise, in the documented cases, the seizure of electronic devices was not limited to the anti-corruption actors themselves. In at least 14 cases, it extended to devices belonging to family members or other individuals present during the searches. In other cases, however, the seizure was confined to property belonging to the anti-corruption actor alone. This indicates some variation in practice, which may be attributable to the specific circumstances of each search, including the number of persons present or the location where it was conducted.

The procedural basis for the searches also differed. In the cases involving former NABU detectives, the searches were conducted pursuant to a judicial warrant, whereas in the majority of the other documented cases the authorities relied on the mechanism of urgent searches carried out without prior judicial authorisation.

Searches were not conducted in every case. In particular, no searches were documented in the cases of Olena Shcherban, Yusuf Mameshev, Maksym Sinchuk, Eduard Smirnov, and Volodymyr Vasylchuk.

In addition, the case of Vitaliy Shabunin is distinguished by the public dissemination, following the search, of private intimate photographs obtained from his seized devices. At the time this study was prepared, no comparable instances of leaks or public disclosure of information obtained from seized electronic devices had been documented in the other cases analysed.

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Overall, the documented cases reveal the consistent use of the same set of methods of pressure against individuals involved in anti-corruption activities: urgent searches accompanied by the mass seizure of electronic devices, restrictions on access to judicial oversight, physical and psychological coercion, and discrediting campaigns in the information space. These measures were directed not only against the anti-corruption actors themselves but also against their families and professional circles. The recurrence of these actions across different criminal proceedings, their temporal concentration, and the coordination between procedural measures and the accompanying information campaign indicate their systemic nature and suggest that they go beyond isolated decisions taken in individual cases.

The simultaneous use of multiple instruments of pressure, their coordination and scale, together with the concurrent activation of criminal proceedings of different types, points to a substantial level of organisational planning and resources behind these measures, significantly reducing the likelihood that they arose independently or by coincidence within separate investigations. This conclusion is further reinforced by the temporal coincidence between the intensive procedural measures and politically significant decisions affecting anti-corruption policy, which together form a single chronological and contextual sequence.

Given that these measures were directed against individuals involved in investigating high-level corruption, together with the recurring consequences in the form of restrictions on their professional activities and the potential weakening of the anti-corruption sector as a whole, the documented cases support the conclusion that formally lawful mechanisms were used not solely for the purposes of criminal prosecution but also to pursue other, extra-procedural objectives related to influencing the anti-corruption system. **Taken together, these circumstances indicate the presence of features suggesting that such measures may have been politically motivated.**

Ruslan Mahamedrasulov at the Pecherskyi District Court of Kyiv, 11 September 2025.
Photo credit: Nikita Halka for Suspilne News

CHAPTER 3.

LEGAL ANALYSIS OF COMPLIANCE WITH NATIONAL STANDARDS OF CRIMINAL PROCEEDINGS IN THE DOCUMENTED CASES

The first chapter examined in detail the factual circumstances surrounding the searches, the seizure of property and documents, the freezing of assets, detentions, and the application of preventive measures against a broad range of anti-corruption actors. The second chapter considered these episodes through the prism of recurrence and indicators of systematicity. This chapter, in turn, analyses whether the decisions, actions, and omissions of officials of the pre-trial investigation authorities and the investigating judges complied with national legislation and the standards of criminal proceedings established under it. The analysis presented here is selective in nature: the examples drawn from the documented cases are not exhaustive but serve to illustrate the typical procedural shortcomings identified in the preceding chapters.

Although the term “standards” appears only once in the CPC of Ukraine, it can nevertheless be concluded that the provisions of Ukraine’s criminal procedural legislation, taken together, have established procedural standards governing criminal proceedings. Among other objectives, these standards are intended to safeguard human rights and ensure fairness, adversarial proceedings, and the effective administration of criminal justice.

For the purposes of this study, the following standards of criminal proceedings are identified:

1. The standard of reasonable suspicion;
2. The standard governing the admissibility, relevance, reliability, and sufficiency of evidence;
3. The standard of proportionality in interference with the rights to property and privacy;
4. The standard of effective judicial oversight of restrictions on human rights;
5. The standard of respect for human dignity and personal integrity.

Taken together, these standards constitute a system of criminal procedural standards, compliance with which is essential both for the protection of human rights in criminal proceedings and for the fulfilment of the objectives of criminal proceedings. Those objectives include, among other things, protecting individuals, society, and the State from criminal offences, as well as safeguarding the rights, freedoms, and legitimate interests of participants in criminal proceedings[372].

At the same time, these standards are not exhaustive, and their analysis in this chapter is determined by the subject matter of the study and their particular relevance to the documented cases examined. Other standards and procedural safeguards may likewise apply at the pre-trial investigation stage, including the presumption of innocence, the right to a defence, equality of arms and the adversarial nature of criminal proceedings, and legal certainty and the foreseeability of procedural decisions, among others. At the trial stage, additional standards become applicable, including the principle of public hearings and open justice, the right to a hearing within a reasonable time, equality before the courts, and others.

1. The standard of reasonable suspicion

is not expressly defined in the CPC of Ukraine. However, the term is used repeatedly throughout the Code as one of the key requirements for the lawfulness of procedural decisions involving restrictions on human rights in criminal proceedings. In particular, the requirement that a reasonable suspicion exist is embedded in the general rules governing the application of measures to secure criminal proceedings[373], the seizure of property[374], the application of preventive measures[375], the withdrawal of applications for preventive measures[376], the provisions regulating the duties of the investigating judge to protect human rights and, to review the lawfulness of deprivation of liberty[377].

A systematic analysis of these provisions supports the conclusion that the standard of reasonable suspicion performs a fundamental safeguarding function within Ukraine’s criminal procedure and constitutes one of the basic prerequisites for the lawful initiation of criminal liability and the subsequent conduct of criminal prosecution. Its essence is that notifying a person of suspicion and subsequently subjecting that person to procedural coercive measures cannot be based on unfounded assumptions or prosecutorial theories unsupported by the specific circumstances of the criminal proceedings. Rather, there must be factual information which, by virtue of its content, source, relevance, and connection to the subject matter of proof, would lead an objective observer to conclude that the person concerned may have committed the specific criminal offence in question.

The standard of reasonable suspicion also requires an individualised assessment of the specific circumstances of the case. This means that the prosecution must present concrete factual information concerning the actions of the particular individual, including the timing, manner, form of culpability,

372 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 2: https://zakon.rada.gov.ua/laws/show/4651-17#Text

373 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 132(3)(1): https://zakon.rada.gov.ua/laws/show/4651-17#Text

374 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 173(2)(3): https://zakon.rada.gov.ua/laws/show/4651-17#Text

375 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 177(2): https://zakon.rada.gov.ua/laws/show/4651-17#Text

376 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 185(1): https://zakon.rada.gov.ua/laws/show/4651-17#Text

377 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 206(2), (7), Article 210(3): https://zakon.rada.gov.ua/laws/show/4651-17#Text

purpose of the conduct, and other circumstances that distinguish the alleged offence from the broader context of the proceedings, from assumptions, or from the actions of other persons. Accordingly, a suspicion cannot be regarded as satisfying the requirements of the law if it is based on generalised assertions, lacks an individualised account of the factual circumstances, or relies on material that does not establish a direct connection between the individual concerned and the alleged criminal offence.

The legal basis for notifying a person of suspicion is the existence of sufficient evidence to suspect that person of having committed a criminal offence. Although the concept of sufficiency of evidence is inherently evaluative, that assessment is not a matter of unfettered prosecutorial discretion. In view of the subsequent application of preventive measures, it must be carried out in accordance with the constitutional guarantees of liberty, personal integrity, the presumption of innocence, the principle of legality, and the other fundamental principles governing criminal proceedings. Consequently, only factual information that is relevant, admissible, reliable, and capable of individually linking a specific person to a specific criminal offence can be regarded as sufficient for these purposes.

An analysis of the materials from the criminal proceedings against NABU detective **Viktor Husarov** indicates that the principal body of factual information relied upon to substantiate the notice of suspicion was obtained from other criminal proceedings, initiated on 19 March 2022 and 29 July 2019, which concerned different time periods and different subjects of proof. These materials do not relate directly to the factual circumstances alleged against Viktor Husarov in the proceedings initiated on 23 April 2025 under Article 111 of the CC of Ukraine (High Treason). Moreover, they were obtained long before the registration of the proceedings in which the notice of suspicion was issued. It has also been established that, during the pre-trial investigation following the notification of suspicion, the prosecution did not in fact obtain any new evidence linking Viktor Husarov to the alleged offences. Instead, the suspicion continued to rely on the same factual information that existed when it was first issued on 21 July 2025. This indicates that no meaningful evidence-gathering was carried out within these proceedings and that the prosecution instead relied on factual material collected in other, temporally remote, criminal proceedings.

Furthermore, the relevant materials were not properly incorporated into the proceedings as evidence in a manner that would enable the court to verify the lawfulness of their acquisition and use. In particular, the defence is unaware of any proper confirmation that the covert investigative (search) actions were conducted pursuant to valid authorisations issued by an investigating judge, or of information concerning the technical means used to record the evidence, the scope of the judicial authorisations, or the continuity of the chain of custody for the information obtained. In such circumstances, the relevant provisions of the CPC of Ukraine apply, under which evidence obtained in substantial violation of human rights and freedoms or of the procedures established by the CPC of Ukraine must be declared inadmissible[378]. Consequently, such evidence cannot serve as the basis for notifying a person of suspicion.

A legal assessment of the reasonable suspicion under Article 111 of the CC of Ukraine likewise demonstrates that the mandatory elements of the alleged offence were not established to the extent required at the stage of notifying a person of suspicion. To establish a reasonable suspicion of high treason, it is necessary to demonstrate that a citizen of Ukraine intentionally acted to the detriment of the country's sovereignty, territorial integrity, defence capability, or other components of national security, and that the individual acted with direct intent to assist a foreign state or organisation in carrying out subversive activities. Neither the notice of suspicion nor the accompanying materials set out specific factual information demonstrating that the suspect intended to cause harm to Ukraine or possessed the requisite criminal intent. Likewise, the allegation that the suspect received "financial remuneration" is not supported by admissible and relevant evidence, despite the fact that such evidence would be essential to substantiate the prosecution's allegation of deliberate assistance to the enemy over the extended period allegedly concerned, namely 2012–2025.

Particular attention should also be paid to the issues surrounding the criminal-law classification of the alleged conduct. Viktor Husarov is accused of disclosing information with restricted access that does not constitute a state secret. The disclosure of such information does not, in itself, amount to the offence of high treason unless it is demonstrated that the conduct created a real threat or caused actual

378 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 87(1): https://zakon.rada.gov.ua/laws/show/4651-17#Text

harm to national security, and that it was committed with the direct intent to engage in subversive activities against the State.

In conclusion, the legal analysis indicates that the notice of suspicion issued to Viktor Husarov in relation to Article 111 of the CC of Ukraine bears indications of being insufficiently substantiated because it is not supported by either direct evidence or a sufficient body of circumstantial evidence establishing the essential elements of the offence of high treason, namely intent, purpose, and actual harm or a real threat to national security, as required under the Constitution of Ukraine, the CPC of Ukraine, and the CC of Ukraine. Nor does the evidence, taken as a whole, amount to a body of evidence capable of satisfying an objective observer that the person concerned may have committed the alleged offence. Accordingly, the notice of suspicion issued to Viktor Husarov does not satisfy the standard of a reasonable and individualised suspicion. It is inconsistent with the constitutional principles governing criminal proceedings, the presumption of innocence, and the principle of legality, creates a risk of arbitrary interference with the individual's rights, and undermines the requirement of legal certainty as an element of the rule of law.

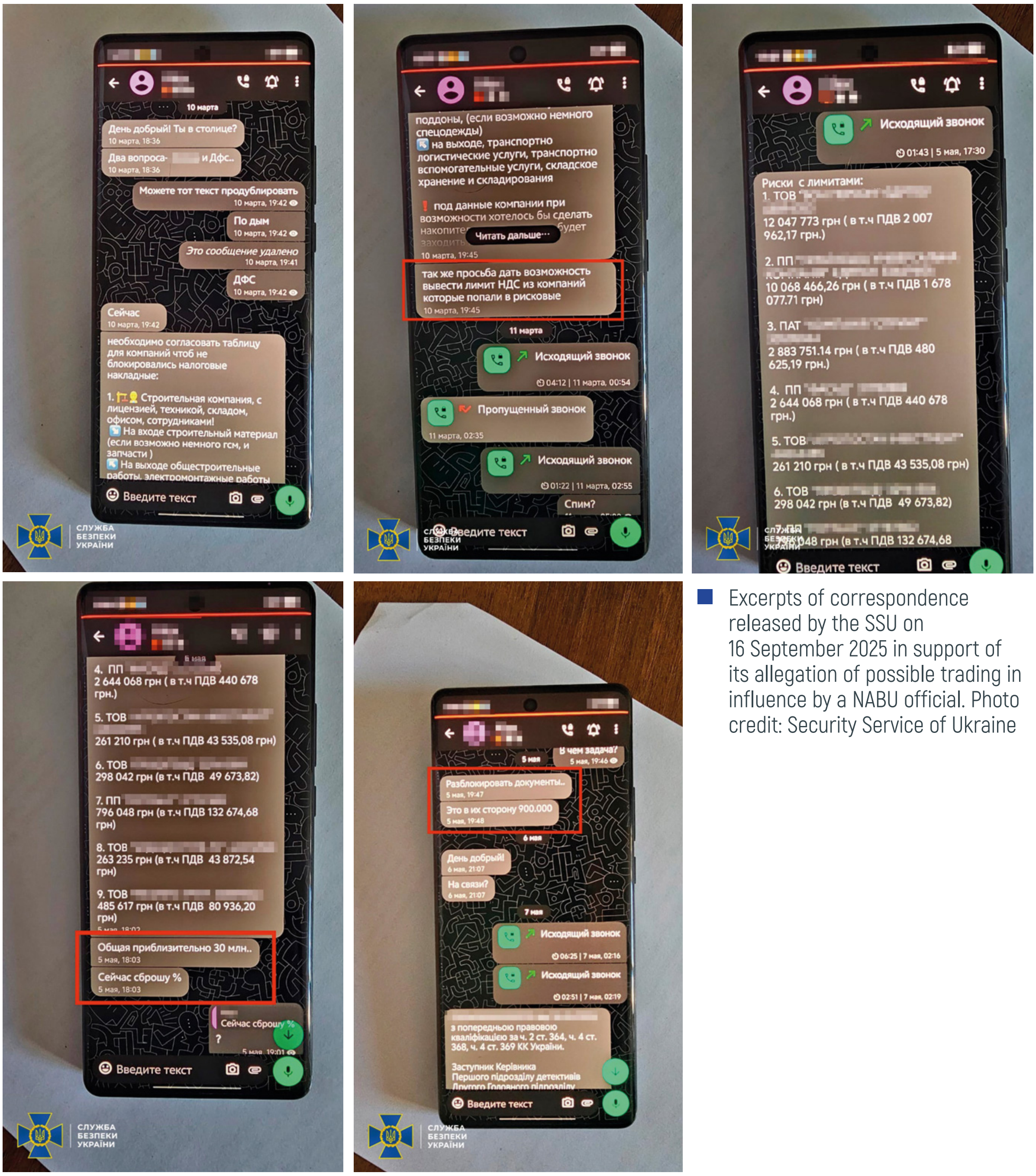
The above conclusions regarding the insufficiency of the evidentiary basis and **the lack of adequate proof of the essential elements of the alleged offence were subsequently borne out by the further course of the criminal proceedings**. In particular, on 12 March 2026, the criminal proceedings against Viktor Husarov on suspicion of high treason were discontinued on the grounds that there was insufficient evidence of his involvement in the alleged criminal offence. This decision indicates that the pre-trial investigation authority failed to obtain a sufficient body of evidence capable of substantiating the notice of suspicion and of supporting the prosecution in accordance with the requirements of Ukraine's criminal procedural legislation.

In the case of **Ruslan Mahamedrasulov**, Head of a NABU detective unit, one of the constituent elements of the offence under Article 111-2 of the Criminal Code of Ukraine is the existence of intent and a specific purpose, namely to provide assistance to the aggressor state with the aim of causing harm to Ukraine. However, none of the materials submitted by the prosecution establishes any contact with representatives of the aggressor state, demonstrates an intention to transfer resources to the aggressor state, or proves that the suspect acted with the intention of causing harm to Ukraine. In the absence of these mandatory elements, the constituent elements of the alleged offence are not established.

In addition to the above qualification, on 16 September 2025 the prosecutor notified Ruslan Mahamedrasulov of an amendment to the previously issued notice of suspicion and of a new suspicion concerning the commission of an offence under Article 369-2(2) of the CC of Ukraine, namely accepting an offer of an undue advantage for himself or a third person in exchange for influencing the decision-making of a person authorised to perform the functions of the State or local self-government. The prosecution alleged that Ruslan Mahamedrasulov had agreed to receive an undue advantage for himself in return for influencing officials of the STS of Ukraine to adopt decisions finding that a number of companies did not meet the criteria for classification as high-risk taxpayers.

To substantiate this allegation, the prosecution relied on correspondence, reportedly obtained from the suspect's mobile phone, concerning a list of companies experiencing difficulties related to high-risk taxpayer classification criteria. At the same time, it should be taken into account that, in his capacity as a NABU official, Ruslan Mahamedrasulov routinely carried out operational activities and regularly received information from potential complainants regarding criminal offences that might fall within NABU's jurisdiction, as well as allegations of possible misconduct by public officials and other state employees. Accordingly, the correspondence in question may have formed part of his operational duties, including efforts to determine the amount of any alleged undue advantage and whether the value of such an alleged benefit for removing companies from the high-risk taxpayer classification fell within NABU's investigative jurisdiction.

It should also be noted that, under Article 369-2(2) of the Criminal Code of Ukraine, the offence of trading in influence consists of accepting an offer, promise, or undue advantage for oneself or a third person in exchange for influencing the decision-making of a person authorised to perform the functions of the State or local self-government. In other words, the essence of trading in influence is an agreement to exert coordinated influence, in return for payment, over a public official in relation to a specific decision to be taken in the exercise of that official's powers. However, neither the notice of suspicion nor any other materials in the case file contain evidence that such an agreement to exert influence was ever reached. Nor does the information disclosed to the defence, including the correspondence relied upon by the prosecution, indicate that it concerned influencing any specific officials of the STS of Ukraine. The prosecution failed to identify either the intended recipient of the alleged influence or the decision in question: it did not specify which officials of the STS of Ukraine were allegedly to be influenced, or which particular procedural or administrative decisions they were expected to make. Accordingly, the notice of suspicion does not satisfy the standard of reasonable suspicion, as it is based solely on excerpts of communications and speculative assumptions.



Excerpts of correspondence released by the SSU on 16 September 2025 in support of its allegation of possible trading in influence by a NABU official. Photo credit: Security Service of Ukraine

A comprehensive assessment of the case materials indicates that they are internally inconsistent, unreliable, and do not constitute a sufficient body of evidence to establish the constituent elements of the alleged offence. The notice of suspicion is based on assumptions rather than adequately substantiated facts, which is fundamentally inconsistent with the principles governing criminal proceedings, the rule of law, and the presumption of innocence.

Another problematic issue in the context of the standard of reasonable and individualised suspicion arises where evidence is effectively gathered against an individual without that person being formally notified of suspicion. This leaves the individual in a procedurally uncertain position and undermines the effective exercise of the right to a defence.

An analysis of the circumstances of the case concerning **Valentyn Shmitko** shows that, following the search of his premises on 21 July 2025, he was summoned to the SBI and questioned as a witness in criminal proceedings concerning the alleged offences of money laundering committed by an organised group or on an especially large scale[379], and illicit enrichment[380]. During the questioning, however, investigators informed the NABU official that draft notices of suspicion, applications for the application of a preventive measure, and applications for his suspension from office had already been prepared. These documents were effectively ready but had not yet been served because the investigators considered it necessary to conduct additional verification of the circumstances surrounding a bank transfer made in the United States.

These circumstances indicate that the pre-trial investigation authority already regarded the witness as a potential suspect and was, in reality, gathering evidence against him. In such circumstances, the formal retention of witness status does not reflect the individual's actual procedural position and results in the deprivation of the safeguards afforded to a suspect. In particular, the individual is denied the full scope of the right to a defence, including the right to be informed of the nature and grounds of the suspicion, the right to the effective participation of legal counsel in all procedural actions, the right to examine the materials forming the basis of the suspicion, the right to challenge procedural decisions, and the right to equality of arms with the prosecution.

In addition, such a situation gives rise to a risk of violating the privilege against self-incrimination, since the individual is questioned as a witness while, in substance, already being the subject of criminal prosecution and a person who may subsequently be notified of suspicion. The absence of proper procedural certainty also deprives the individual of effective judicial oversight over the actions of the prosecution and of the opportunity to challenge restrictions on his or her rights.

Taken together, these circumstances indicate that the procedural safeguards established by criminal procedural legislation were circumvented, including the guarantees of the right to a defence, legal certainty, and fair criminal proceedings.

2. The standard governing the admissibility, relevance, reliability, and sufficiency of evidence is closely linked to the standard of reasonable and individualised suspicion at the pre-trial investigation stage. This is because a notice of suspicion, applications for measures to secure criminal proceedings, investigative (search) actions, covert investigative (search) actions, and other procedural decisions may be based only on factual information that has been obtained in accordance with the law, relates to the subject matter of proof, and is capable of being verified for its reliability. This standard performs an essential safeguarding function by preventing criminal proceedings from relying on information that is incidental, unverified, improperly obtained, or unlawfully acquired as evidence.

The requirements governing evidence in criminal proceedings are set out in Chapter 4 of the CPC of Ukraine. Evidence consists of factual information obtained in the manner prescribed by law, on the basis of which the investigator, inquiry officer, prosecutor, investigating judge, and the court establish the circumstances relevant to the criminal proceedings. Such factual information may be relied upon as evidence only if it satisfies the requirements of relevance, admissibility, and reliability, and, when considered as a whole, is sufficient to justify the procedural decision in question.

Relevant evidence is evidence that directly or indirectly confirms or disproves the facts to be established in criminal proceedings, as well as other circumstances of significance to those proceedings[381]. Accordingly, the relevance of evidence depends not merely on its existence but on its substantive connection with the subject matter of proof in the particular criminal proceedings. Where such a connection is absent, the factual information concerned cannot lawfully serve as the basis for a notice of suspicion or for any other procedural decision.

379 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 209(3): https://zakon.rada.gov.ua/laws/show/2341-14#Text
380 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 368-5: https://zakon.rada.gov.ua/laws/show/2341-14#Text
381 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 85: https://zakon.rada.gov.ua/laws/show/4651-17#Text

Admissibility of evidence means that the evidence has been obtained from a proper procedural source, by an authorised person, in the prescribed procedural form, and in compliance with the requirements of criminal procedural law. Evidence is considered admissible if it has been obtained in accordance with the procedure established by the CPC of Ukraine. Inadmissible evidence may not be relied upon in procedural decision-making, and a court may not base its judgment upon such evidence[382].

At the same time, the requirement of admissibility extends beyond the mere existence of a procedural document. It also requires that the lawfulness of the evidence's origin, the scope of the authorisation under which it was obtained, and compliance with the procedures governing its recording, preservation, and transfer can all be effectively verified. This requirement is of particular importance where the prosecution relies on the results of CISA, the seizure of property and documents during searches, the involvement of specialised expertise, or forensic examinations, as procedural irregularities in these contexts may directly affect the admissibility of the resulting evidence.

Ukrainian legislation expressly provides that evidence obtained as a result of a substantial violation of human rights and freedoms guaranteed by the Constitution of Ukraine, the laws of Ukraine, and international treaties is inadmissible. The same applies to any other evidence derived from information obtained as a result of such a violation. Such violations include, in particular:

1. carrying out procedural actions that require prior judicial authorisation without such authorisation or in breach of its essential terms;
2. obtaining evidence through torture or through cruel, inhuman, or degrading treatment, or by threatening to subject a person to such treatmen;
3. violation of the individual's right to a defence;
4. obtaining testimony or explanations from a person who has not been informed of the right to refuse to testify and to decline to answer questions, or obtaining such testimony or explanations in violation of that right[383].

In addition to the above, the cited provision establishes other grounds on which evidence may be declared inadmissible. The list of such grounds is not exhaustive.

Reliability of evidence means that the information it contains corresponds to objective reality. It requires that the origin of the evidence, the integrity of its contents, the absence of inconsistencies in the manner of its collection and recording, and its consistency with the other materials in the proceedings can all be verified. Uncertainty regarding the origin of the evidence, the absence of proper documentation of its characteristics, or any breach in the chain of custody objectively calls its reliability into question.

Relevance, admissibility, and reliability are interrelated but distinct characteristics of evidence. While relevance concerns the substantive connection between the evidence and the subject matter of proof, admissibility relates to the lawfulness of the method by which the evidence was obtained and compliance with the prescribed procedural form, whereas reliability concerns whether the information recorded in the evidence accurately reflects objective reality. Only where all of these requirements are satisfied can evidence properly serve as the basis for procedural decisions in criminal proceedings. Conversely, reliance on factual information that fails to satisfy any one of these requirements creates a risk of arbitrary interference with individual rights and undermines the principles of legality, adversarial proceedings, and fair criminal proceedings.

In light of the foregoing, assessing whether the evidentiary basis satisfies these requirements involves examining not only the content of the individual items of evidence but also the lawfulness of their sources, the procedure by which they were incorporated into the case file, compliance with the limits of procedural authorisations, the adequacy of their procedural documentation, and the extent to which they can be effectively scrutinised by the defence and the court.

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382 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Articles 86 and 87: https://zakon.rada.gov.ua/laws/show/4651-17#Text

383 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 87: https://zakon.rada.gov.ua/laws/show/4651-17#Text

An analysis of the materials in the criminal proceedings against **Viktor Husarov** reveals significant shortcomings in compliance with this standard. In particular, a substantial part of the evidentiary basis in these proceedings was derived from materials originating from other criminal proceedings dating back to 2019 and 2022. Moreover, the prosecution relied on these materials without properly incorporating or regularising them within the framework of the new criminal proceedings. Specifically, the case file contains no evidence that these materials were duly admitted as evidence in accordance with the prescribed procedure, thereby preventing both the defence and the court from verifying the lawfulness of their acquisition and use. This points to procedural deficiencies in the handling of the evidence and to the improper use of materials originating from other criminal proceedings.

It was also established that part of the evidentiary basis relied on the results of CISAs conducted in the context of other criminal proceedings. However, the case file contains no adequate confirmation that those CISAs were authorised by valid rulings of an investigating judge, or that they were carried out within the scope of the judicial authorisation and in compliance with the prescribed procedural requirements. The file contains no information regarding the technical means used to record the information obtained, the procedures governing their use, or any admissible evidence demonstrating that the relevant CISAs were conducted pursuant to valid judicial authorisations and in accordance with the applicable requirements governing the recording of information and the identification of the technical equipment used. These circumstances indicate that the resulting materials are inadmissible as evidence in the criminal proceedings, since, under Ukrainian law[384] the results of investigative (search) actions and CISAs obtained in substantial violation of the requirements of criminal procedural law must be declared inadmissible.

Particular attention should be paid to the procedural documentation of the items and property seized during the search. During the search of Viktor Husarov's apartment, investigators seized a substantial number of items, including notebooks, sheets of paper, mobile phones, cash, identity documents, and other personal belongings. However, the subsequent procedural treatment of these items as physical evidence displays signs of a merely formal approach. With respect to the cash seized, the search record does not specify the serial numbers of the banknotes, contains no detailed description of the cash, and includes no photographic record of it. In addition, no separate inspection record was prepared in relation to the seized cash. The investigator's decision recognising the cash as physical evidence likewise contains no adequate information concerning the manner in which it was to be stored.

This approach is inconsistent with the requirements of Article 100(2) of the CPC of Ukraine and the established procedures governing the handling of physical evidence. The absence of an adequate description and proper documentation of the seized items effectively prevents verification of their identity and reliability, thereby undermining their use as evidence in the criminal proceedings.

Similar deficiencies were identified in relation to the seizure of mobile phones. In particular, the iPhone 16 Pro belonged to a third party – Viktor Husarov's wife, Olena Husarova – who voluntarily surrendered the device during the search. Under the CPC of Ukraine, however, the temporary seizure of mobile communication devices is generally prohibited, except where such devices constitute the direct instrument of a criminal offence or where their seizure is necessary for the purposes of a forensic examination[385]. The case materials contain no adequate information demonstrating that either of these conditions was met. Accordingly, the seizure of a mobile phone belonging to a third party lacked a proper procedural basis, rendering any information obtained from that device inadmissible as evidence.

Furthermore, an analysis of the case materials demonstrates the absence of a sufficient connection between some of the seized items and the subject matter of proof in the criminal proceedings. This conclusion is reinforced by the decision of the investigating judge of the Shevchenkivskyi District Court of Kyiv of 20 August 2025, who refused to impose an attachment on part of the seized property, including cash and identity documents, on the grounds that the prosecution had failed to provide an adequate justification linking those items to the alleged criminal offence[386].

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384 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 87: https://zakon.rada.gov.ua/laws/show/4651-17#Text

385 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 168(2), Article 194: https://zakon.rada.gov.ua/laws/show/z0705-98#Text

386 Ruling of the Shevchenkivskyi District Court of 20 September 2025 in Case No. 761/33311/25: https://reyestr.court.gov.ua/Review/130341026

These circumstances indicate that some of the seized items do not satisfy the requirements governing physical evidence under Article 98 of the CPC of Ukraine and therefore cannot be relied upon as relevant, reliable, and admissible evidence in the criminal proceedings.

As the principal evidence supporting the notice of suspicion, the prosecution relies on the findings of a comprehensive forensic examination combining a forensic semantic and textual analysis with an expert assessment in the field of national security. However, an analysis of this report reveals significant procedural and methodological shortcomings. The expert panel consisted, in essence, of a forensic linguist and a legal scholar engaged as a "specialist in the field of national security", who is not a certified forensic expert.

A substantive analysis of Expert Report No. SE25-478/1 demonstrates that its authors exceeded the limits of their specialised expertise by substituting legal assessments for factual findings. Conclusions such as "*the materials are used by the FSB of the Russian Federation to cause harm…*" and statements asserting "*compliance with the applicable legislation*" amount, in substance, to legal characterisations and conclusions regarding harm to national security. By their very nature, such determinations fall within the competence of the investigator, the prosecutor, or the court, rather than that of an expert. Under Article 242(1) of the CPC of Ukraine, "an expert examination shall not be conducted for the purpose of resolving questions of law". Accordingly, the experts effectively expressed opinions on questions of law, which is expressly prohibited by statute.

It is also known that the prosecution issued a decision ordering a psychological/polygraph examination, to which Viktor Husarov voluntarily consented. However, the defence was not granted access to the results of that examination, creating a procedural imbalance: the prosecution is potentially relying on material that remains inaccessible to the defence, thereby undermining the adversarial nature of the proceedings and the effective exercise of the right to a defence. Taken together, these circumstances make it impossible to assess this evidence in terms of its relevance, admissibility, and reliability.

Accordingly, the analysis of the evidence in Viktor Husarov's case reveals substantial procedural violations in the collection and handling of evidence, including the use of materials from other criminal proceedings without proper procedural regularisation, the absence of adequate confirmation of the lawfulness of the CISAs, the use of expert findings to answer questions of law, and the seizure during searches of items unrelated to the criminal proceedings. Taken together, these circumstances demonstrate that a significant portion of the evidentiary basis in the criminal proceedings against Viktor Husarov is inadmissible, irrelevant, and unreliable, thereby precluding the adoption of procedural decisions based on evidence obtained in violation of the requirements of criminal procedural law.

In the case of **Ruslan Mahamedrasulov**, the prosecution's principal evidence supporting the suspicion of aiding the aggressor state[387] consists of audio and video recordings of a conversation on which the prosecution has constructed its allegation that he was preparing to provide such assistance. An excerpt from this conversation is reproduced in the CISA record documenting the audio and video surveillance of the person and was subsequently made public by the SSU.

According to the prosecution, this conversation demonstrates an intention to arrange the transfer of industrial hemp seeds in the interests of the aggressor state, allegedly as part of a "Dagestan state programme". However, even assuming that the information obtained through these CISAs is formally admissible, it is not relevant, as it does not substantiate any of the factual allegations advanced by the prosecution. On the contrary, it undermines the allegation of any connection with the aggressor state. During his examination before the court, the witness Yusuf Mameshev confirmed that he was the person with whom the suspect had been speaking and that both the conversation and the subsequent correspondence concerned Uzbekistan, as evidenced by references to "Uzbeks" and information regarding the state regulation of industrial hemp cultivation in that country.

Particular attention should be paid to the fact that the prosecution's entire case effectively rests on a single word appearing in the transcript of the conversation – "Dagestan" – from which it derives a fundamentally different geographical, legal, and criminal-law context. Dagestan is not a sovereign state but a constituent republic of the Russian Federation, which already calls into question the reference to a "state programme". Moreover, the prosecution has produced no objective evidence that either the

387 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 111-2: https://zakon.rada.gov.ua/laws/show/2341-14#Text

Russian Federation or the Republic of Dagestan operated a specific state programme aimed at procuring foreign industrial hemp seeds. At the same time, the defence established that the Liryna and Hlesiia hemp varieties are not included in the relevant register of the Russian Federation, meaning that seeds cultivated in Ukraine could not have formed part of any such programme.

Excerpt from the transcript of a conversation involving Ruslan Mahamedrasulov, released by the SSU on 21 July 2025.

Screenshot from the Security Service of Ukraine's YouTube channel

Another item of evidence consists of the suspect's correspondence with individuals allegedly representing Agroprime LLC. The correspondence in Telegram, submitted by the SSU, contains significant internal inconsistencies, including the use of an email address belonging to a different organisation, chronological inconsistencies concerning the deadlines for submitting subsidy applications, an absence of any discernible logic in the conduct of the alleged company representative, and a lack of objective verification of the authenticity of the user accounts involved. Taken together, these circumstances indicate that the correspondence does not reflect actual events and bears signs of having been artificially created, thereby calling into question both its reliability and its admissibility as evidence.

The mobile phone examination record of 18 September 2025, relating to a device believed to belong to Ruslan Mahamedrasulov, confirms that no information indicating the commission of any criminal offence was identified. There are procedural irregularities concerning the manner in which the prosecution examined and unlocked the device. These irregularities cannot presently be disclosed in view of the defence's ongoing preparation of its legal position.

A memorandum dated 15 July 2025, prepared by the Head of the Second Directorate of the Main Directorate for Countering Systemic Threats to State Governance of the DPNS SSU, states that Ruslan Mahamedrasulov had a telephone conversation on 10 February 2025 with H. H. Zalikhmanov, a citizen of the Russian Federation. However, this memorandum does not constitute admissible or reliable evidence, since the recording of communications between individuals is carried out within the framework of CISAs, the results of which must be documented in a formal protocol. Accordingly, the prosecution currently relies on this memorandum and the conversation allegedly referring to Dagestan as their only evidence of guilt. Under the applicable provisions of the CPC of Ukraine, however, these materials constitute inadmissible evidence. A review of H. H. Zalikhmanov's social media accounts indicates that he supports Russian military formations. However, since the prosecution has failed to establish that Ruslan Mahamedrasulov actually communicated with H. H. Zalikhmanov, information concerning the latter's social media activity has no procedural relevance.

In the proceedings against the suspect, the prosecution conducted searches at six locations on 21 July 2025. All of these searches were carried out without prior authorisation from an investigating judge, which meant that, under the CPC of Ukraine, the prosecution was required to apply to an investigating judge without delay for judicial authorisation of the searches after they had been conducted[388]. However, the defence has not received any information indicating that the prosecution submitted such applications to an investigating judge, and it has well-founded doubts as to whether any such applications were made in a timely manner.

388 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 233(3): https://zakon.rada.gov.ua/laws/show/z0705-98#Text

At the same time, the materials of the criminal proceedings indicate that there were no grounds for conducting urgent searches. Numerous memoranda prepared by SSU officers stated that it was necessary to conduct urgent searches at the above-mentioned addresses. However, these memoranda were prepared 7–10 days before the searches were actually carried out, meaning that there was sufficient time to apply to an investigating judge for judicial authorisation. This is particularly significant given that, under the CPC of Ukraine, an application for a search warrant must be considered by the court on the day it is filed, with the participation of the investigator or prosecutor[389]. Accordingly, there are grounds to conclude that the decision to conduct the urgent searches was not justified by genuine urgency but was instead taken with the aim of exerting psychological and physical pressure on the individuals subjected to the searches.

In addition, during the search, SSU officers allegedly committed unlawful acts against Ruslan Mahamedrasulov, inflicting documented physical injuries to his head and torso. As noted above, evidence obtained through torture or through cruel, inhuman, or degrading treatment, or by threats of such treatment, must be declared inadmissible[390]. Consequently, any information obtained under such circumstances cannot lawfully be relied upon as evidence in criminal proceedings.

Ruslan Mahamedrasulov after sustaining the documented physical injuries inflicted during the search on 21 July 2025.
Photo provided by the defence for ZMINA

Moreover, under the “fruit of the poisonous tree” doctrine, not only evidence obtained directly through unlawful means but also any derivative evidence obtained on the basis of information acquired through violations of human rights must be regarded as inadmissible. In these circumstances, the use of physical violence during investigative (search) actions violates fundamental human rights guaranteed by the Constitution of Ukraine and international treaties, and casts serious doubt on the lawfulness and admissibility of a substantial part of the evidentiary basis in the criminal proceedings.

An analysis of the criminal proceedings against **Yevhen Tokar** reveals violations of the standards of admissibility, relevance, and reliability of evidence in the context of the seizure of property confiscated during the search. In particular, during the hearing on 24 July 2025 concerning the prosecution’s application for the attachment of property, the prosecution sought to impose an attachment on property seized during the search of the home of the head of a NABU detective unit, arguing that it constituted physical evidence. However, the prosecutor failed to provide any specific information regarding the content of the data stored on the seized devices or to explain how that information was connected to the criminal proceedings arising from the road traffic accident that occurred on 16 May 2021. In these circumstances, there are no grounds for concluding that the seized items constitute relevant evidence within the meaning of Article 85 of the CPC of Ukraine, since no connection between those items and the subject matter of proof has been established.

Despite this, the investigating judge granted the application for the attachment of the property without examining whether the seized items satisfied the criteria for physical evidence set out in Article 98 of the CPC of Ukraine, and without assessing whether they were admissible for use in the criminal

389 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 234(4): https://zakon.rada.gov.ua/laws/show/z0705-98#Text

390 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 87(2)(2): https://zakon.rada.gov.ua/laws/show/z0705-98#Text

proceedings. In addition, the court failed to address the ownership of the property, even though some of the seized data storage devices belonged to third parties, including the suspect's wife and NABU, which required a separate assessment of their connection to the subject matter of proof.

Significantly, following appellate review 46 days later, the ruling of the investigating judge was lifted. The appellate court expressly held that the first-instance investigating judge had failed to verify whether the seized property met the criteria for physical evidence established by Article 98 of the CPC of Ukraine and had therefore ordered its attachment without sufficient legal grounds. This demonstrates that, at the time the attachment order was made, the standard of relevance had not been satisfied and that the use of those items as evidence did not comply with the requirements of criminal procedural law. This issue will be examined in greater detail in the section analysing the proportionality of interference with the right to property.

It is also appropriate to draw attention to violations of the standards of admissibility and relevance of evidence in relation to the seizure of property during the search of the home of Ivan Shmitko – the brother of **Valentyn Shmitko**, the head of a NABU detective unit – conducted on 21 July 2025. During the search, investigators seized documents belonging to third parties that bore no connection to the subject matter of proof in the criminal proceedings, including title documents relating to the brother's house, ownership documents for an apartment belonging to the suspect's father-in-law, and registration documents for a vehicle owned by the suspect's wife.

Documented physical injuries sustained by Ruslan Mahamedrasulov during the forensic medical examination.

Photos provided by the defence for ZMINA

These actions demonstrate the seizure of irrelevant evidence that fails to satisfy the requirements of Article 85 of the CPC of Ukraine, since the documents do not establish any facts falling within the subject matter of proof. Moreover, the seized documents were neither unique nor at risk of being lost or altered, as the relevant ownership information is contained in official state registers and could have been obtained by the prosecution through the procedures provided by law. In these circumstances, there were no grounds for seizing the documents, particularly in the course of an urgent search conducted without prior authorisation from an investigating judge. Taken together, these circumstances point to a serious breach of the procedural rules governing the collection of evidence and provide grounds for declaring such evidence inadmissible.

In **Yurii Tsvietkov**'s case, the evidence was obtained in criminal proceedings initiated on 21 July 2025 on suspicion of high treason. During the night of 20–21 July 2025, while Kyiv was under a large-scale missile attack by the Russian Federation, Yurii Tsvietkov went down to an underground car park. According to the NABU officer, at approximately 5:30 a.m., three men armed with pistols, dressed in camouflage uniforms bearing SSU insignia and wearing balaclavas, unlawfully entered his vehicle. According to Tsvietkov, they then used physical force by grabbing him by his clothing, arms, and hair before forcibly dragging him out of the vehicle into the car park. The three men continued to use force by holding him by both arms and his hair, pushing his face against a reinforced concrete pillar in the car park, and repeatedly striking him with their hands and feet. While continuing the assault, they repeatedly demanded to know the location of his mobile phone. The use of force was partially captured by the car park's CCTV cameras and is also documented in medical records.

The subsequent circumstances indicate that the use of physical force was systematic and deliberate, with the objective of gaining access to the information stored on Tsvietkov's mobile phone. The assault was accompanied by threats of further violence, as well as threats to his life and health, which effectively compelled him to disclose the password to the device. Accordingly, access to the digital data was obtained not voluntarily but under physical and psychological coercion.

In these circumstances, the conduct of the law enforcement officers bears the hallmarks of cruel and degrading treatment, while the violence inflicted amounted to a physical assault that exceeded the limits of permissible procedural coercion, particularly given that Tsvietkov offered no resistance. The injuries sustained were confirmed by a forensic medical examination conducted in the course of the criminal proceedings. As noted above, under Article 87(2) of the CPC of Ukraine, evidence obtained through torture or through cruel, inhuman, or degrading treatment, as well as through threats of such treatment, is inadmissible, thereby precluding the use of any information obtained under such circumstances as evidence in criminal proceedings.

3. The standard of proportionality of interference with the right to property and privacy is established, inter alia, in Article 234 of the CPC of Ukraine, which provides that an investigating judge shall refuse an application for a search warrant unless the prosecutor or investigator demonstrates sufficient grounds for believing that, in the circumstances of the case, the search is the most appropriate and effective means of locating and seizing items and documents relevant to the pre-trial investigation, as well as of establishing the whereabouts of wanted persons, and that it constitutes a measure proportionate to the interference with the individual's private and family life[391].

In the criminal proceedings against **Viktor Husarov**, the investigator seized a wide range of items and documents during the search conducted on 21 July 2025. The prosecution subsequently applied for an attachment order in respect of all the seized property, including notebooks, loose sheets of paper, cash, a Ukrainian passport, a taxpayer identification card, a certificate of change of surname, first name and patronymic, an international passport, mobile phones, and other items.

At the hearing on the application for the attachment of property on 20 August 2025, the investigating judge granted the application only in part, ordering the attachment of certain items, including notebooks, loose sheets of paper, mobile communication devices, and other property. At the same time, the judge refused to order the attachment of the cash, the Ukrainian passport, the taxpayer identification card, the certificate of change of surname, first name and patronymic, and the international passport, finding that the interference with the right to property in respect of those items was unjustified, since the investigator had failed to establish sufficient grounds for believing that the property was relevant to the pre-trial investigation or could serve as evidence during the trial[392].

The cash was kept in a safe that was voluntarily opened by the detective's wife, Olena Husarova, and the apartment was jointly owned (½ by Viktor Husarov and ½ by Olena Husarova), making it objectively impossible to attribute the seized funds automatically and exclusively to the suspect. In addition, there is evidence that Olena Husarova had lawful sources of the funds, including income from the sale of motor vehicles in 2021 and 2025, as well as bank transfers to her account in 2022, all of which are directly relevant to assessing the necessity and proportionality of the interference with property rights. Accordingly, the decision refusing to order the attachment of part of the seized property demonstrates that, already at the pre-trial stage, the court, in exercising its judicial oversight function, found that the prosecution had failed to substantiate the connection between part of the seized property and the subject matter of proof or the statutory criteria for physical evidence, and concluded that the proposed interference was disproportionate.

The appellate court likewise upheld the first-instance court's finding that the attachment of all the seized property would have been disproportionate and unnecessary. In doing so, it referred to the judgment of the ECtHR of 21 February 1986 in James and Others v. the United Kingdom, noting that "there must be a reasonable relationship of proportionality between the means employed and the aim sought to be realised"[393].

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391 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 234(5)(5): https://zakon.rada.gov.ua/laws/show/z0705-98#Text

392 Ruling of the Shevchenkivskyi District Court of Kyiv of 20 August 2025 in Case No. 761/33311/25: https://surl.li/jkurgd

393 Ruling of the Kyiv Court of Appeal of 18 November 2025 in Case No. 761/33311/25: https://reyestr.court.gov.ua/Review/132146270

In the criminal proceedings against **Ruslan Mahamedrasulov**, a wide range of items and documents were seized during the search, including:

- ammunition and a firearm, for which lawful possession and carrying were duly authorised;
- certificates of service, an appointment order, handwritten notes, hard drives, removable data storage devices, a NABU employee's official seal, SIM cards and their packaging;
- a car owned by the suspect.

Following appellate review, the attachment orders were set aside, and the prosecution was ordered to return the relevant property. In particular, the attachment of the firearm was partially lifted by an appellate court ruling of 4 December 2025, after which the firearm was returned. The attachment of the documents and other seized items was lifted by a ruling of 18 December 2025; however, those items have still not been returned to the suspect. In addition, by a ruling of the investigating judge dated 30 December 2025, the attachment of the vehicle was lifted. According to the defence, however, the vehicle was not returned to its owner until March 2026. In April 2026, following appellate review, the attachment of property seized from an apartment in Dnipro was also lifted. As of May 2026, almost all of the detective's seized property had been returned, with the exception of his mobile phones and ammunition.

These circumstances give rise to serious doubts as to whether the principle of proportionality was respected in the interference with the suspect's property rights. On the one hand, both the appellate courts and the investigating judge concluded that there were no sufficient legal grounds for the continued restriction of the right to property and accordingly lifted the attachment orders. On the other hand, the property was returned only after substantial delays, while part of it remained in the possession of the pre-trial investigation authority for a prolonged period even after the relevant judicial decisions had become final. In these circumstances, the interference with the right to property went beyond what was necessary to achieve the legitimate aims of the criminal proceedings and imposed an excessive individual burden on the person concerned. Taken together, these circumstances may indicate that a fair balance was not struck between the interests of criminal justice and the right to property.

It is also noteworthy that, in these proceedings, the prosecution first applied for the attachment of the property seized during the searches and succeeded in obtaining those orders. Only afterwards did it seek judicial authorisation for the searches themselves, following their execution. Although the investigating judges were intended to serve as a procedural safeguard, they effectively authorised the searches only after the attachment of the property seized during those searches had already been approved.

In the criminal proceedings against **Vitaliy Shabunin**, the searches were conducted without prior authorisation from an investigating judge and in the absence of a defence. On 11 July 2025, searches were carried out at his place of military service in the Chuhuiv district of the Kharkiv region, as well as at his residence in the Kyiv region. As there were no apparent grounds for an urgent search related to saving lives or the immediate pursuit of a suspect, the searches lacked a proper procedural basis and should have been conducted only pursuant to a judicial warrant issued following consideration of an application by the prosecution.

During the searches, Vitaliy Shabunin's mobile phone and computer were seized, together with his wife's devices (a mobile phone and laptop) and his children's two tablets. A large volume of private and work-related data, including confidential material, was copied from his mobile phone.

Subsequently, in violation of the statutory prohibition on disclosing information from the pre-trial investigation, intimate photographs stored on the seized phone were published on a Telegram channel on 16 December 2025[394]. Such conduct constitutes the offence provided for in Article 387(2) of the CC of Ukraine ("Disclosure of information relating to operational-search activities or the pre-trial investigation"). On 18 December, Shabunin filed a criminal complaint alleging offences under

394 Anti-corruption activist Vitaliy Shabunin stated that the SBI and the Prosecutor General's Office "leaked" his intimate photos from his phone, which was seized during a search / ZMINA. https://zmina.info/news/aktyvist-vitalij-shabunin-zayavyv-shho-dbr-i-ogp-zlyly-jogo-intymni-foto-z-telefonu-vyluchenogo-pid-chas-obshuku/

that provision as well as Article 182 of the CC of Ukraine ("Violation of the Right to Privacy"). The information was entered into the URPI only on 24 December, after he had lodged a complaint with the investigating judge concerning the investigating authorities' failure to register the offence in the URPI[395].

In the criminal proceedings against **Yevhen Tokar**, the search was conducted as an urgent search on 21 July 2025. However, it was carried out in connection with criminal proceedings concerning a road traffic accident that had occurred on 16 May 2021 – more than four years before this supposedly "urgent" investigative (search) action took place. In these circumstances, the justification for treating the search as a matter of urgency appears purely formal.

The following seized items also appear to be irrelevant to the subject matter of proof in criminal proceedings concerning a road traffic accident:

- a laptop used by his daughter, Diana Tokar;
- a laptop used by his wife, Iryna Tokar;
- a data storage device belonging to NABU;
- data storage devices and USB flash drives;
- Yevhen Tokar's mobile phone.

It should also be noted that, according to the NABU official's wife, during the search she handed over her mobile phone at the request of an SBI investigator after being told that it was required "for examination". She was, however, allegedly misled, because once the device had been unlocked, the investigator made a complete copy of its contents. As a result, SBI officers obtained wholly unjustified access to her private correspondence, personal photographs, and other aspects of her private life, none of which could reasonably be regarded as relevant to the subject matter of proof in criminal proceedings concerning a road traffic accident. Overall, the search lasted four hours.

Three days later, on 24 July 2025, the Pecherskyi District Court of Kyiv considered the prosecution's application for the attachment of the property seized during the search. Although the prosecution characterised the seized items as physical evidence, it failed to provide any specific information linking those items to the circumstances of the road traffic accident. Nevertheless, the investigating judge granted the application for the attachment of the property. In doing so, the judge effectively accepted the position of the prosecutor and investigator, who argued that the laptops, data storage devices, and mobile phone contained information relating to the criminal offence under investigation and that the attachment of the property was therefore necessary both to ensure the effectiveness of the criminal proceedings and to preserve the physical evidence[396]. In exercising judicial oversight, however, the investigating judge failed to take into account the fact that some of the seized items belonged to third parties rather than to the suspect himself.

On the following day, Yevhen Tokar's defence lodged an appeal. However, contrary to the requirement of Article 422(2) of the CPC of Ukraine, the appeal was not examined within three days. Instead, the appellate court scheduled the hearing only 46 days after the appeal had been filed. Following the appellate review, the appeal was allowed, and the investigating judge's order attaching the seized property was lifted. In its judgment, the appellate court held that: "*In breach of the requirements of Article 173(2)(1) and (2) of the CPC of Ukraine, the investigating judge failed, when determining the issue of the attachment of the seized property, to properly examine the legal basis for such attachment and the possibility of using the property as evidence in the criminal proceedings, and failed to establish whether there was sufficient evidence to justify the attachment for the purpose of preserving physical evidence. Although the pre-trial investigation authority recognised the above property as physical evidence, the prosecutor failed, in the application, to substantiate preservation of physical evidence as the purpose of attaching the temporarily seized property. The case file demonstrates that attaching the above property does not justify such a degree of interference with the property rights and freedoms of its owner in light*

395 Ukraine's State Bureau of Investigation fails to launch internal probe into anti-corruption activist Vitaliy Shabunin photo leak / ZMINA: https://zmina.info/news/dbr-dosi-ne-pochalo-sluzhbove-rozsliduvannya-cherez-vytik-foto-vitaliya-shabunina/

396 Ruling of the Pecherskyi District Court of 24 July 2025 in Case No. 757/34130/25-k: https://reyestr.court.gov.ua/Review/129242569

of the needs of the pre-trial investigation and, in the circumstances of this case, clearly upsets the fair balance between the owner's legally protected interests and the objectives of these criminal proceedings, thereby depriving the attachment of the seized property for the purpose of preserving physical evidence of any justification"[397]. In compliance with the above appellate court judgment, the seized property was returned on 26 September 2025.

The unjustified restriction of the NABU officer's property rights, as well as those of his family members, remained in effect for more than two months. These actions constitute a disproportionate interference with the right to property and the right to private life, affecting not only the NABU official himself but also third parties who were not participants in the criminal proceedings. The seizure of property with no apparent connection to the subject matter of proof, together with access to the entirety of individuals' personal data without proper procedural justification, went beyond what was necessary to achieve the objectives of the pre-trial investigation and failed to satisfy the requirement of proportionality.

In these circumstances, the interference by the State cannot be regarded as necessary in a democratic society, since the measures employed were excessive in relation to the procedural objective pursued. This indicates a breach of the standard of proportionality governing interference with the right to property, as well as the related guarantees protecting the right to private life and the peaceful enjoyment of possessions under domestic law and international standards.

4. The standard of effective judicial oversight of restrictions on human rights is intended to safeguard human rights during the pre-trial stage of criminal proceedings. This standard applies when assessing whether there are lawful grounds for restricting the constitutional and other fundamental rights of participants in criminal proceedings through investigative (search) actions and CISAs, the application of measures to secure criminal proceedings and preventive measures, the examination of complaints against the decisions, actions, or omissions of an investigator, inquiry officer, or prosecutor, the consideration of applications for recusal, and other procedural matters.

Of all the documented cases, the preventive measure of pre-trial detention was imposed, at the prosecution's request, on three individuals (Viktor Husarov, Ruslan Mahamedrasulov, and Sentiabr Mahomedrasulov). A further two individuals (Yevhen Tokar and Maksym Sinchuk) were placed under night-time house arrest.

The lawfulness of the prosecution's application for the imposition of pre-trial detention must be assessed in light of the mandatory legal requirements governing the restriction of an individual's liberty[398]:

a) the existence of a reasonable suspicion;

b) the existence of specific risks set out in Article 177 of the CPC of Ukraine, namely the need to prevent attempts to:

1. abscond from the pre-trial investigation authorities and/or the court;
2. destroy, conceal, or distort any item or document of material significance for establishing the circumstances of the criminal offence;
3. unlawfully influence the victim, a witness, another suspect, the accused, an expert, or a specialist in the same criminal proceedings;
4. otherwise interfere with the criminal proceedings;
5. commit another criminal offence or continue the criminal offence of which the person is suspected or accused;

c) proof that no less restrictive measure would be capable of mitigating those risks.

If all of these elements are not established, the law expressly requires the court to refuse the application for the preventive measure.

397 Ruling of the Kyiv Court of Appeal of 9 September 2025 in Case No. 757/34130/25-k: https://reyestr.court.gov.ua/Review/130212414

398 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 177(2), Article 194: https://zakon.rada.gov.ua/laws/show/z0705-98#Text

In the criminal proceedings against **Viktor Husarov**, by a ruling dated 22 July 2025, the investigating judge imposed the preventive measure of pre-trial detention for a period of 60 days, without the possibility of release on bail. The judge based this decision on the finding that the prosecutor had established the existence of the following risks, namely that the suspect might:

- abscond from the pre-trial investigation authorities and/or the court;
- destroy, alter, or conceal any item of material significance for establishing the circumstances of the criminal offence;
- unlawfully influence witnesses or other suspects in the same criminal proceedings.

In addition, the investigating judge took into account the suspect's personal circumstances, noting that he was a NABU officer, married, had a young child and a dependent mother, as well as considering his financial situation. The court also considered the circumstances of the alleged offence against the foundations of Ukraine's national security, which had attracted significant public attention because it was allegedly committed during the period of martial law in Ukraine, together with the severity of the potential penalty that the suspect would face if convicted of the offences under Article 111(1) and Article 362(3) of the CC of Ukraine, which are classified as serious and particularly serious criminal offences.

Having regard to the risks set out in Article 177 of the CPC of Ukraine, the investigating judge concluded that no preventive measure other than pre-trial detention could be applied to Viktor Husarov, and that no less restrictive preventive measure would be capable of mitigating the risks identified under Article 177 of the CPC of Ukraine.

No amount of bail was set, with the courts relying on the provisions of the CPC of Ukraine[399], under which an investigating judge or a court, when ordering a preventive measure, is entitled not to determine the amount of bail for certain categories of criminal offences specified by law. The appellate court agreed with these findings, dismissed Viktor Husarov's appeal, and upheld the preventive measure of pre-trial detention[400].

The court confined itself to a formal recitation of the risks set out in the CPC of Ukraine, without properly assessing whether they were supported by the specific circumstances of the criminal proceedings. Risks such as absconding, destruction of evidence, or unlawful influence over witnesses, despite their inherently prospective nature, must be supported by concrete facts rather than by general assumptions or the seriousness of the alleged offence.

The case file contains no evidence demonstrating that such risks were real. The suspect made no attempt to evade the investigation, had strong and stable social ties, the evidentiary record was predominantly documentary in nature and had already been assembled, and the prosecution identified no specific facts suggesting that he had attempted to influence witnesses. In these circumstances, the conclusion that pre-trial detention was necessary, particularly without the possibility of bail, was unfounded. The investigating judge failed to provide adequate reasons as to why less restrictive preventive measures would have been insufficient and did not carry out an individualised assessment of the circumstances of the case.

Article 183(4) of the CPC of Ukraine, which governs the application of pre-trial detention where bail may be available, provides that: "*The investigating judge or the court may decide not to determine the amount of bail in criminal proceedings*...". This provision confers a discretionary power on the court when choosing among alternative preventive measures. In the proceedings against Viktor Husarov, however, the court relied on the legal classification of the alleged offences as the basis for concluding that pre-trial detention without an alternative was required. Under the law, however, the prosecution must demonstrate – and the investigating judge must be satisfied – that bail, house arrest, or a personal recognisance would not be sufficient to mitigate the identified risks.

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399 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 183(4), Article 194: https://zakon.rada.gov.ua/laws/show/z0705-98#Text

400 Ruling of the Kyiv Court of Appeal of 8 September 2025 in Case No. 761/30370/25: https://reyestr.court.gov.ua/Review/130175375

The repeated extensions of[401] Viktor Husarov's pre-trial detention in the absence of any new evidence following the notification of suspicion on 21 July 2025 were inconsistent with the requirements of necessity and proportionality. At the same time, on 10 December 2025, the investigating judge decided to replace the preventive measure with round-the-clock house arrest, noting that "*the necessary investigative (search) actions have been completed, which indicates that there is no longer a risk of obstructing the criminal proceedings in any other way*". The investigating judge considered that "*preventive measures less restrictive than house arrest would not be capable of ensuring the suspect's proper procedural conduct, having regard to the seriousness of the alleged criminal offence, the high degree of the risks provided for in Article 177 of the CPC of Ukraine as established by the investigating judge, and the high degree of public danger posed by the alleged offence against the foundations of Ukraine's national security*"[402].

Taken together, these circumstances demonstrate the formalistic nature of judicial oversight in the proceedings against Viktor Husarov, the absence of a thorough assessment of the evidence supporting the alleged risks, the automatic imposition of pre-trial detention without the possibility of bail based solely on the legal classification of the alleged offence, and the automatic extension of that preventive measure without an individualised assessment of the circumstances of the case.

On 22 July 2025, the investigating judge of the Pecherskyi District Court of Kyiv ordered pre-trial detention without the possibility of bail in respect of **Ruslan Mahamedrasulov**. That preventive measure was subsequently extended by rulings of the investigating judge on 12 September and 17 October.

An analysis of the decisions of the investigating judges in these criminal proceedings indicates that the courts systematically disregarded the requirements of the CPC of Ukraine when considering the prosecution's applications for the imposition and extension of the preventive measure of pre-trial detention, including by failing to comply with the standard of effective judicial oversight of restrictions on human rights in criminal proceedings. In practice, judicial oversight was reduced to a formal endorsement of the prosecution's position and a recitation of the relevant provisions of the CPC of Ukraine, without any meaningful assessment of the arguments advanced by the defence. In particular, the courts failed to give due consideration to:

- the suspect's serious medical condition, resulting from a stroke and two major neurosurgical operations performed in 2025;
- his family circumstances, including the fact that he supported a minor child;
- his many years of service in law enforcement, including with NABU;
- his official commendations, certificates of merit, and status as a combat veteran.

Furthermore, an analysis of the rulings of the Pecherskyi District Court of Kyiv dated 22 July, 12 September, and 17 October 2025, demonstrates that the investigating judges failed to comply with the requirements of the CPC of Ukraine[403] regarding the mandatory grounds for imposing a preventive measure. They failed to establish the existence of a reasonable suspicion, the existence of at least one of the risks set out in Article 177 of the CPC of Ukraine, and the insufficiency of less restrictive preventive measures.

The reasonable suspicion was not supported by relevant evidence, while the risks set out in Article 177 of the CPC of Ukraine were merely recited in a formal manner, without reference to any specific facts relating to the suspect's conduct or personal circumstances:

1. As regards the risk of absconding from the pre-trial investigation authorities or the court, the prosecution relied exclusively on the potential severity of the sentence that might be imposed. However, this approach is inconsistent both with the CPC of Ukraine and with the settled case-law of the ECtHR, according to which the severity of the potential sentence cannot, by itself,

401 By a ruling of the investigating judge of the Shevchenkivskyi District Court of Kyiv of 15 September 2025 (Case No. 761/38239/25, Proceeding No. 1-ks/761/24788/2025), valid until 21 October 2025, which was upheld by the Kyiv Court of Appeal on 6 October 2025, and subsequently by a ruling of the investigating judge of the Shevchenkivskyi District Court of Kyiv of 16 October 2025 (Case No. 761/43882/25, Proceeding No. 1-ks/761/27930/2025), valid until 14 December 2025, which was upheld by the Kyiv Court of Appeal on 27 November 2025.

402 Ruling of the Shevchenkivskyi District Court of 10 December 2025 in Case No. 761/50821/25: https://surl.li/opaknu

403 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 194:

constitute the sole or decisive factor in assessing the risk of flight. The case file contained no evidence that Ruslan Mahamedrasulov intended to abscond, change his place of residence, or evade participation in procedural actions. On the contrary, his intention to prove his innocence logically demonstrates an interest in an open and public judicial examination of the case;

2. The risk of unlawfully influencing witnesses or other suspects was based solely on the existence of possible personal acquaintances between the suspect and other participants in the proceedings, including family ties. At the same time, the prosecution produced no evidence whatsoever of any actual or potential attempt to influence witnesses or any other persons;

3. The risk of otherwise interfering with the criminal proceedings was based on the prosecution's reliance on Ruslan Mahamedrasulov's position and professional experience as an alleged "aggravating factor". This approach effectively and unjustifiably placed the suspect at a disadvantage because of his professional status and was contrary to the principle of equality before the law and the courts. Knowledge of procedural mechanisms cannot in itself be regarded as a risk and should not serve as a basis for imposing custodial preventive measures;

4. The prosecution's assertion that the suspect might commit a new criminal offence was based solely on the nature of the alleged offence and on generalised statements, without taking into account the suspect's personal circumstances, the absence of any previous convictions, or his professional background. No factual evidence was presented to substantiate the existence of such a risk.

As noted above, in criminal proceedings concerning offences against the foundations of Ukraine's national security, the CPC of Ukraine allows an investigating judge to impose pre-trial detention without setting bail. However, the existence of this possibility does not create an automatic rule or a presumption that bail should not be set. On the contrary, it requires a heightened standard of proof and reasoning. Accordingly, when exercising its discretionary powers, the court is required to provide clear reasons why, in the particular criminal proceedings, an alternative preventive measure in the form of bail would be impossible or insufficient to achieve the purpose of the preventive measure. The absence of such reasoning demonstrates a formalistic approach to judicial oversight and fails to satisfy the requirements that judicial decisions be both well-founded and properly reasoned.

Furthermore, pursuant to Article 184(1)(6) of the CPC of Ukraine, the prosecutor is required, in an application for a preventive measure, to demonstrate why the identified risks cannot be mitigated through the application of less restrictive preventive measures, including bail. The absence of an alternative to pre-trial detention therefore requires more than merely selecting the most restrictive measure; it requires proof that none of the available alternatives would ensure the effectiveness of the criminal proceedings. This standard of proof cannot be satisfied by declaratory assertions alone but requires specific factual circumstances demonstrating that the suspect's proper procedural conduct cannot be secured by means of bail or any other preventive measure. Accordingly, the absence of an alternative to the preventive measure cannot be presumed; it must be established by the prosecution and properly reasoned by the court in each individual case.

In the criminal proceedings against Ruslan Mahamedrasulov, however, the prosecution relied only on formal references to the nature of the alleged offence and abstract assertions concerning threats to national security, without producing any evidence demonstrating why bail could not be applied as an alternative preventive measure.

As noted above, pre-trial detention was repeatedly extended by rulings of the investigating judges of the Pecherskyi District Court of Kyiv. An analysis of those rulings demonstrates, however, that the investigating judges did not carry out a fresh assessment of the evidence supporting the reasonable suspicion or of the risks affecting the criminal proceedings. Instead, they relied on standardised wording, stating that "*the investigating judge has taken into account the existence of a reasonable suspicion that the person committed the criminal offences in question, the need to carry out investigative (search) actions and procedural actions aimed at completing the pre-trial investigation, as well as the existing risks that formed the basis for the application of the preventive measure of pre-trial detention and which, at the time of the consideration of the application for the extension of pre-trial detention, had not diminished*"[404].

404 Ruling of the Pecherskyi District Court of 17 October 2025 in Case No. 757/50823/25-k

Keeping the suspect in pre-trial detention for more than four months without producing any new evidence to support the reasonable suspicion or the continuing existence of the alleged risks constituted an abuse of procedure. This is demonstrated by the fact that, during the appellate hearing on 3 December 2025, in the absence of any new evidence or changes in the factual circumstances, the order for pre-trial detention was lifted and Ruslan Mahamedrasulov was released in the courtroom. The appellate court held that the prosecutors had failed to establish the existence of any of the risks set out in Article 177 of the CPC of Ukraine. Having regard to the circumstances of the case, the potential sentence, and the suspect's personal circumstances, the court concluded that a sufficient and proportionate measure was to require him to appear before the investigator, prosecutor, or court upon first request, pursuant to Article 194(3) of the CPC of Ukraine. Although the appellate court did not explain which specific risks had ceased to exist, it nevertheless set aside the order for pre-trial detention[405].

In the case of **Sentiabr Mahomedrasulov**, pre-trial detention was ordered on 22 July 2025, and the measure was subsequently extended by rulings of the investigating judges on 11 September and 17 October 2025. Throughout that period, and until the court ordered pre-trial detention with the possibility of bail on 2 December 2025, the investigating judges consistently relied in their rulings on the existence of a reasonable suspicion and a range of procedural risks set out in Article 177 of the CPC of Ukraine.

For example, the appellate court, in upholding the investigating judge's decision to extend pre-trial detention, stated as follows: "*The evidence contained in the case file, together with the circumstances relied upon by the pre-trial investigation authority in its application, provides sufficient grounds to conclude that the risks identified at the time the preventive measure of pre-trial detention was imposed on the suspect have not diminished and continue to exist. The pre-trial investigation authority has sufficiently demonstrated the continuing existence of the risks provided for in Article 177(1) of the CPC of Ukraine*"[406].

However, two and a half months later, the same court held that, in its view, the investigating judge had failed to take into account that the investigator had not properly demonstrated in the application that, having regard to the seriousness of the alleged criminal offence, its consequences, the nature and circumstances of the alleged conduct, and the suspect's personal circumstances, the identified risks were of such a degree and likelihood that they could be addressed only by pre-trial detention without the possibility of bail. Accordingly, the appellate court concluded that the investigating judge's decision to extend pre-trial detention without setting bail was unfounded. Since the CPC of Ukraine does not provide for the partial quashing of an investigating judge's ruling, the panel of judges decided to set aside the ruling in its entirety and issue a new one. By that ruling, the investigator's application to extend the period of pre-trial detention was granted in part: an alternative preventive measure in the form of bail was set at 150 subsistence minimums for able-bodied persons (UAH 454,200), and the suspect was made subject to the obligations set out in Article 194(5) of the CPC of Ukraine[407].

The foregoing analysis of these three cases demonstrates that, when considering applications for the imposition and extension of pre-trial detention, the courts failed to ensure compliance with the standard of effective judicial oversight of restrictions on human rights in criminal proceedings. Their decisions were based on a formal reiteration of the prosecution's arguments, without properly examining the existence of a reasonable suspicion, the risks set out in Article 177 of the CPC of Ukraine, or the possibility of applying less restrictive preventive measures.

At the same time, the subsequent lifting of pre-trial detention by the appellate court in the absence of any new evidence confirms that, at the time the earlier decisions were adopted, the prosecution had failed to establish either the existence of a reasonable suspicion or the continuing relevance of the alleged risks. This demonstrates the formalistic nature of the judicial oversight exercised and the failure to comply with the requirements of criminal procedural law governing the review of the grounds for restricting the right to liberty.

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405 Ruling of the Kyiv Court of Appeal of 3 December 2025 in Case No. 757/50823/25-к: https://reyestr.court.gov.ua/Review/132496593

406 Ruling of the Kyiv Court of Appeal of 22 September 2025 in Case No. 757/44322/25-к. URL: https://reyestr.court.gov.ua/Review/130733642

407 Ruling of the Kyiv Court of Appeal of 3 December 2025 in Case No. 757/50823/25-к: https://reyestr.court.gov.ua/Review/132496593

In another case – that concerning **Yevhen Tokar** – an SBI investigator applied for the NABU official's pre-trial detention and suspension from office immediately after the search of his home had been completed – on 21 July 2025. The following day, the Pecherskyi District Court of Kyiv considered the application. The investigating judge found that it had not been properly substantiated and had failed to take into account that pre-trial detention is the most restrictive preventive measure and may be imposed only where less restrictive preventive measures are incapable of mitigating the relevant risks and ensuring the proper conduct of the criminal proceedings. Although the investigating judge refused the application for pre-trial detention, he imposed a different preventive measure – night-time house arrest. The investigating judge also failed to explain why less restrictive preventive measures would have been insufficient in the circumstances of the case and did not properly assess the suspect's personal characteristics and procedural conduct, including the absence of previous convictions, his exemplary service record, his strong social ties, and the fact that he had dependent family members incapable of work.

It is important to emphasise that the criminal proceedings against Yevhen Tokar have been ongoing since 2021, and throughout that period he made no attempt to evade or obstruct the investigation. Nevertheless, the investigating judge did not consider why such a restriction of the suspect's rights had become necessary only four years later. House arrest is also a custodial preventive measure that significantly restricts a person's freedom of movement and therefore requires convincing justification before the court, together with effective judicial oversight of the restriction of individual rights. In these circumstances, the imposition of night-time house arrest without adequate justification for such interference demonstrates a formalistic approach by the court to the assessment of both the alleged risks and the availability of alternative preventive measures. This is particularly so given that the appeal was not heard until 53 days after it had been lodged.

Neither the first-instance court nor the appellate court, however, carried out a proper assessment of whether the restriction on the suspect's freedom of movement was proportionate to the legitimate aim pursued or whether less restrictive measures could have ensured his proper procedural conduct. This indicates a failure to comply both with the standard of proportionality governing interference with individual rights and with the standard of effective judicial oversight in the application of preventive measures.

Similarly, on 23 July 2025, the court considered the prosecution's application to suspend Yevhen Tokar from office. An analysis of the application and the accompanying materials, however, demonstrates that it was formalistic in nature and lacked adequate substantiation. In particular, at the time the application was considered, the prosecutor did not possess accurate information regarding the suspect's current position within NABU, nor did the prosecutor provide any information concerning the scope of his official powers that allegedly required restriction. In these circumstances, the prosecution was objectively unable to demonstrate how the suspect's remaining in office could have interfered with the pre-trial investigation.

Despite these deficiencies, the investigating judge granted the application to suspend the suspect from office without verifying compliance with the requirements of Article 132(3) of the CPC of Ukraine concerning the necessity of interfering with the right to work. Nor did the judge establish the mandatory circumstances set out in Article 155(2)(4)–(6) of the CPC of Ukraine, including the suspect's actual position, how that position could have facilitated the commission of the alleged criminal offence, or how the specific powers attached to that position could have been used to obstruct the criminal proceedings.

Also, the court failed to properly assess whether the alleged risks were genuine, as required under Article 157 of the CPC of Ukraine. It also overlooked the fact that the alleged offence occurred outside the scope of the suspect's official duties and arose from a road traffic accident, while the key evidence had already been collected by the time the motion was considered. These circumstances objectively eliminated any risk of interference with the pre-trial investigation.

Particular concern also arises from the failure to comply with the requirement of a prompt appellate review. The defence lodged its appeal on 28 July 2025, yet the Kyiv Court of Appeal did not consider it until 50 days later, by which time the suspension order had already expired. This was inconsistent with the statutory requirement that such appeals be examined within three days. Following the appellate review, the investigating judge's ruling was upheld. Taken together with the procedural shortcomings outlined above, these circumstances indicate a failure to ensure the standards of effective judicial review and resulted in an unjustified restriction of the individual's liberty, as well as their right to work.

In the case of **Vitalii Tiebiekin**, the pre-trial investigation was conducted into alleged offences under Article 366-2 of the CC of Ukraine ("Declaration of false information"). Following the notification of suspicion on 11 September 2025, the Pecherskyi District Court of Kyiv granted the prosecution's motion and suspended the NABU employee from office for two months. The investigating judge also partially granted the prosecution's request to impose a preventive measure in the form of bail, setting it at more than UAH 2.9 million, and imposed procedural obligations until 7 November 2025 (the prosecution had sought bail exceeding UAH 4 million).

It is noteworthy that the offence of which the official was suspected is classified as a non-serious crime[408]. Accordingly, under the CPC of Ukraine[409], bail in such cases should range from one to twenty subsistence minimums for able-bodied persons (as of 2025, from UAH 3,028 to UAH 60,560).

These circumstances demonstrate that the judicial oversight exercised in this case was formalistic and ineffective. By setting bail at more than UAH 2.9 million in proceedings concerning a non-serious offence, the investigating judge effectively disregarded the mandatory provisions of the CPC of Ukraine, which establish clear statutory limits for bail in such cases. This indicates that the preventive measure was inconsistent with the principles of legality and proportionality and that there was no adequate justification for departing from the criteria established by law.

Taken together, these actions undermined the effectiveness of judicial oversight as a safeguard for the protection of individual rights and created a risk of arbitrary interference with those rights.

The unfounded nature of the bail amount set by the investigating judge at first instance is further confirmed by the fact that, in December 2025, the appellate court reduced it from UAH 3 million to UAH 45,000. This confirms that the original amount of bail was manifestly excessive and unjustified. The very need for appellate intervention highlights the deficiencies of the initial judicial oversight and its failure to adequately safeguard the individual's rights at the stage of the investigating judge's consideration of the prosecution's motion.

5. Respect for human dignity and personal liberty

is one of the fundamental standards governing criminal proceedings. It is derived from the provisions of the Constitution of Ukraine, criminal procedural legislation, and Ukraine's international human rights obligations. Under Article 29 of the Constitution of Ukraine, everyone has the right to liberty and security of person, and deprivation of liberty is permissible only on the grounds and in accordance with the procedure established by law. Article 28 of the Constitution of Ukraine guarantees respect for human dignity and prohibits torture and cruel, inhuman or degrading treatment or punishment.

These constitutional guarantees are further elaborated in a number of provisions of the CPC of Ukraine, which prohibit treatment or punishment that degrades human dignity[410], during criminal proceedings. They also place a duty on the investigating judge to oversee compliance with human rights whenever coercive procedural measures involving deprivation of liberty are applied[411].

Particular importance in this context attaches to the legal regulation of detention without an order of an investigating judge. Under Article 208(1) of the CPC of Ukraine, such detention is permissible only in clearly defined circumstances, namely:

1. if the person is apprehended while committing a criminal offence or attempting to commit one;
2. if, immediately after the commission of a criminal offence, an eyewitness, including the victim, or a combination of obvious signs on the person's body or clothing, or at the scene of the crime, indicates that the person has just committed the offence;

408 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Article 12(4): https://zakon.rada.gov.ua/laws/show/2341-14#Text

409 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 182(5)(1): https://zakon.rada.gov.ua/laws/show/z0705-98#Text

410 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 12: https://zakon.rada.gov.ua/laws/show/z0705-98#Text

411 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 206: https://zakon.rada.gov.ua/laws/show/z0705-98#Text

3. if there are reasonable grounds to believe that a person suspected of committing a serious or especially serious corruption offence falling within the jurisdiction of the National Anti-Corruption Bureau of Ukraine may abscond in order to evade criminal liability;

4. if there are reasonable grounds to believe that a person suspected of committing an offence under Articles 255, 255-1 or 255-2 of the CC of Ukraine may abscond in order to evade criminal liability[412].

The law further requires that the exact moment of the actual deprivation of liberty be clearly recorded and documented in accordance with Article 209 of the CPC of Ukraine, as it is from that moment that the individual acquires the status of a detained person and becomes entitled to the procedural safeguards afforded by law.

Compliance with this standard also requires that any use of physical force, special means, or other measures restricting liberty be lawful, necessary, and proportionate to the legitimate aim pursued. In exercising their powers, law enforcement authorities are bound by the principle of special legal authorisation, meaning that they may employ only those coercive measures and means of enforcement expressly provided for by law. Accordingly, the use of means of restraining movement not prescribed by law, or the use of force in the absence of an objective necessity, may amount to a violation of both the right to liberty and security of person and the principle of respect for human dignity.

The application of this standard also extends to the period following a person's deprivation of liberty. The State has a positive obligation to ensure adequate conditions of detention, access to medical care, respect for privacy, and an effective opportunity to exercise the right to defence. Failure to comply with these requirements, as well as the creation of conditions that degrade human dignity or impede the exercise of fundamental procedural rights, demonstrates the State's failure to fulfil its obligations regarding the treatment of persons deprived of their liberty.

Official detention was applied to two NABU employees – **Viktor Husarov** and Ruslan Mahamedrasulov – as well as to Sentiabr Mahomedrasulov. An analysis of the procedure and circumstances surrounding Viktor Husarov's detention indicates significant violations of the Constitution of Ukraine and the provisions of criminal procedural legislation governing the deprivation of liberty. According to the detention record, the official time of detention was recorded as 10:22 a.m. on 21 July 2025, with reference to paragraph 10 of Article 615(1) of the CPC of Ukraine, which regulates the procedure for detaining a person without an order of an investigating judge under martial law.

However, the factual circumstances of the detention, as recorded in the detention record and the search record, indicate that the actual deprivation of liberty occurred significantly earlier – at approximately 8:45 a.m. at a checkpoint on the outskirts of Kyiv – without any procedural document having been drawn up at that time. According to Viktor Husarov's account, which has not been rebutted by any material submitted by the prosecution, he was stopped by armed masked individuals who neither identified themselves nor informed him of the grounds for his detention or explained his rights. They then used physical force and restrained the NABU employee by binding his hands with plastic cable ties, thereby restricting his freedom of movement. From that moment, he was unable to leave the scene, remained under the complete physical control of law enforcement officers, and awaited the search. Accordingly, the actual detention commenced from the moment of the real deprivation of liberty, rather than from the time recorded in the detention record, as required by Article 209 of the CPC of Ukraine, which defines the moment of detention, and Article 115(5) of the CPC of Ukraine, which provides that the relevant time limits begin to run from the moment of the actual detention.

Furthermore, the circumstances of the case do not disclose the existence of any of the grounds for detention set out in Article 208 of the CPC of Ukraine, cited above, as the acts referred to in the notice of suspicion allegedly occurred during periods significantly removed in time. Nor were there any obvious signs on the person's body or clothing, or at the scene, indicating that a criminal offence had just been committed. Moreover, at the time of the detention, no preventive measure had been imposed on the individual and no procedural obligations had been placed upon him, thereby excluding the application of Article 208(2) of the CPC of Ukraine.

412 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 208: https://zakon.rada.gov.ua/laws/show/z0705-98#Text

Particular concern also arises from the use of physical force. Viktor Husarov's account indicates that he was subjected to violent acts that were not necessitated by any need to overcome resistance or ensure the safety of law enforcement officers. The use of physical blows, coercion to disclose passwords to his mobile phone, and statements referring to the law enforcement officers' "unlimited powers" point to a serious breach of the principles governing the treatment of detainees and of the prohibition of inhuman or degrading treatment, as guaranteed by the Constitution of Ukraine and the international standards binding on Ukraine. Furthermore, Ukrainian legislation does not provide for the use of plastic cable ties in place of handcuffs or other authorised special means. Accordingly, these actions appear to constitute a violation of the right to respect human dignity, as expressly guaranteed by domestic law and Article 3 of the ECHR.

The foregoing leads to the conclusion that Viktor Husarov's detention, carried out without a proper procedural decision, in the absence of lawful procedural grounds, and involving the use of physical force and unauthorised means of restraint, failed to comply with national legal standards and cannot be regarded as lawful pre-trial detention within the meaning of domestic law.

Ruslan Mahamedrasulov was detained on 21 July 2025. According to the detention record, the stated ground for his detention was that "*he committed an offence under Article 14(1), Article 28(2), and Article 111-2(1) of the CC of Ukraine*". The same wording appears in the section describing the circumstances established by the pre-trial investigation authority. However, under Article 208 of the CPC of Ukraine, the mere fact that a person is alleged to have committed a criminal offence does not constitute a lawful ground for detention without an order of an investigating judge, and the list of such grounds is exhaustive and not subject to broad interpretation. An analysis of Article 615(1)(6) of the CPC of Ukraine, which regulates detention under martial law, likewise demonstrates that none of the statutory grounds is applicable to the circumstances of this case or even referred to in the detention record. In the absence of the grounds provided for in Articles 208 and 615 of the CPC of Ukraine, the detention amounts to an unlawful deprivation of liberty and an excess of authority by the officials concerned.

Furthermore, the detention record does not specify the criminal case number under which the alleged offence was being investigated. This constitutes a significant breach of criminal procedural law and makes it impossible to establish the legal basis for carrying out procedural actions against the individual. A further violation concerns the failure of the authorised official who carried out the detention to immediately inform the detainee, in a language he understood, of the grounds for his detention, the criminal offence of which he was suspected, and his right to legal counsel and other procedural rights, as required by Article 208(4) of the CPC of Ukraine.

The medical examination of Ruslan Mahamedrasulov documented bodily injuries to his head and torso sustained during the detention. Taken together with the absence of any resistance on the part of the detainee, these circumstances indicate that the officials involved exceeded their lawful authority.

Accordingly, since the detention was unlawful, lacked any procedural basis, and was not accompanied by resistance on the part of the detainee, any use of physical force was, by its very nature, unlawful and unjustified, regardless of the severity of the injuries inflicted.

Taken together, the violations committed during Ruslan Mahamedrasulov's detention indicate that he was subjected to an arbitrary deprivation of liberty, inflicted with bodily injuries, and that the law enforcement officers involved exceeded their lawful authority. In legal terms, this procedural action cannot properly be characterised as a detention; rather, it amounted to an unlawful and violent deprivation of liberty, while the individual's subsequent custody further demonstrates an abuse of official powers.

Alongside the official detentions described above, several instances of actual deprivation of liberty without proper procedural formalisation were also documented, involving Yurii Tsvietkov and Illia Statura.

Yurii Tsvietkov was apprehended in the parking area near his residence before the search of his home had begun. According to his account, physical force was used against him, after which he was forcibly taken to the apartment to ensure his presence during the search. In substance, these actions amounted to a short-term detention carried out without formally conferring procedural status upon the individual**. Illia Statura** was held in a vehicle for approximately three hours while searches were being conducted. During that period, he was not free to leave the vehicle or move about at will, which in practice constituted a deprivation of liberty without any formal procedural record of detention.

Physical force exceeding the minimum threshold of severity was also used against **Ivan Kravchuk** during the search conducted in Kyiv on 21 July 2025. According to Kravchuk, after he opened the door, he was abruptly pulled into the corridor, his face was forced against the wall, he was pinned to it, and his hands were secured behind his back with plastic cable ties. At the time, he was wearing only his underwear and did not resist. He states that he remained in this position for approximately 15 minutes, experiencing physical pain, but his request to have his hands released was refused, while he was simultaneously told that he was not under detention. However, the provisions of criminal procedural legislation define the moment of detention as the moment when a person is deprived of their liberty through the use of force or by order, which is precisely what occurred in this case.

As noted above, the standard of respect for human dignity must also be observed when applying the custodial preventive measure of pre-trial detention. Among the cases examined, this measure was imposed on **Viktor Husarov**, **Ruslan Mahamedrasulov**, and **Sentiabr Mahomedrasulov**. They were held in the Kyiv SIZO during the following periods: Viktor Husarov from 22 July to 10 December 2025; Ruslan Mahamedrasulov from 22 July to 3 December 2025; and Sentiabr Mahomedrasulov from 22 July to 2 December 2025.

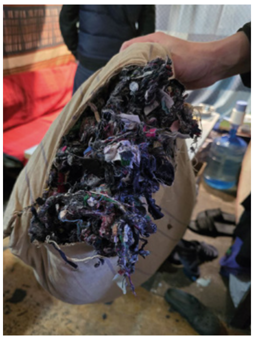
This facility has been visited repeatedly by monitors of the NPM in the course of carrying out its mandate under the Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. As part of the Ombudsman's Office project, "Systematic Monitoring of Human Rights. Observance at SI "Kyiv Pre-Trial Detention Facility", 70 monitoring visits were conducted to the facility during 2024–2025. These visits identified a wide range of human rights violations, including:

- unsanitary conditions, mold in cells, inadequate provision of furniture and essential equipment, overcrowding and the failure to provide the minimum living space per detainee, insufficient natural and artificial lighting, and inadequate temperature conditions (for example, air temperatures ranging from +11.7°C to +13.5°C were recorded);
- failure to ensure the right to privacy, including sanitary facilities without doors that were only partially screened, preventing detainees from using them in private;
- failure to comply with the requirement to keep different categories of convicted prisoners and pre-trial detainees separately;
- inability of convicted prisoners and pre-trial detainees to access medical care due to an insufficient number of staff available to escort them to the medical unit, as well as the poor quality of medical services;
- poor-quality food, inadequate meal preparation, and inefficient use of food supplies, as evidenced by the substantial amount of food returned to the kitchen for disposal because detainees and convicted prisoners refused to eat it;
- violation of the right of convicted prisoners and pre-trial detainees to receive a food package before being transported outside the SIZO to participate in criminal proceedings, as evidenced by the absence of detainees' signatures in the register recording the issuance of food packages and complaints that such food had not been provided;
- placing detainees alone in cells designed to accommodate two or more persons;
- lack of privacy and violations of the rules governing the installation and use of video surveillance[413].

In addition, Kyiv SIZO has no shelter that detainees could use in the event of an air raid or other emergency, placing their right to life at serious risk.

413 Report on the Results of Visits to the Kyiv SIZO Using New Monitoring Tools. Kyiv, 2025: https://files.notorture.org.ua/Library/Kyyivske_SIZO.pdf

All of these deficiencies affected the NABU officials and the father of one of them, who were held in Kyiv SIZO, as became apparent following the disclosure of information regarding their conditions of detention[414].



The detention conditions described above were documented during a monitoring visit to Kyiv SIZO carried out by Maryna Demura as a member of the NPM monitoring group on 20 March 2025

A detailed assessment of **Viktor Husarov**'s conditions of detention at Kyiv SIZO was conducted on the basis of information provided by the SIZO administration and the regional branch of the State Institution "Healthcare Centre of the State Criminal Executive Service of Ukraine". Following his admission to the facility on 22 July 2025, Viktor Husarov underwent an initial medical examination and was subsequently examined by several specialists, including a general practitioner, an otolaryngologist, a surgeon, a neurologist, and a traumatologist. He also underwent laboratory testing and electrocardiography (ECG). Formally, these measures indicate that the SIZO administration complied with the minimum requirements for organising medical supervision.

Particular concern also arises from the restriction of the defence's access to the detainee's complete medical records, despite the existence of court decisions and the legal obligation to respond to lawyers' requests. The reliance by the SIZO administration and the regional branch of the "Healthcare Centre of the State Criminal Executive Service of Ukraine" on the alleged absence of "proper proof of the lawyer's authority" to obtain medical information, despite the submission of a warrant and the lawyer's participation in the criminal proceedings, effectively concealed relevant information and obstructed the exercise of the right to defence guaranteed by Article 59 of the Constitution of Ukraine and Article 20 of the CPC of Ukraine. Such an approach is inconsistent with the fundamental principles of criminal proceedings, since medical information concerning the health of a person in custody is directly relevant to assessing the lawfulness and proportionality of continued detention and to ensuring respect for human dignity.

The formal denial of access to this information also undermines the principles of adversarial proceedings and equality of arms. Taken together, these circumstances demonstrate that the State has failed to fully discharge its positive obligation to ensure the proper treatment of persons deprived of their liberty.

The conditions of **Ruslan Mahamedrasulov**'s detention in Kyiv SIZO differed significantly from the ordinary detention regime and displayed features of enhanced, effectively individualised supervision. In particular, he was placed in a two-person cell which, according to his account, was among the smallest

414 "The SSU Twice Failed to Provide a Substantive Response to Requests Regarding an Internal Review of Its Officers over the Detention Conditions of a NABU Detective", ZMINA, 12 March 2026: https://zmina.info/news/esbivczi-dvichi-ne-vidpovily-po-suti-na-zapyty-shhodo-perevirky-spivrobitnykiv-cherez-umovy-utrymannya-detektyva-nabu/

in the facility. He was held there alone. At the same time, the defence was not informed of any official decision or justification for placing him under a single-cell regime, nor was there any indication that he had been subjected to disciplinary sanctions or classified as posing an increased risk to other detainees. Meanwhile, the defence was informed that no vacant cells with improved detention conditions were available.

The cell was located on a semi-basement floor and became extremely cold once outdoor temperatures fell, as it was not heated. Its only window had been blown out by the blast wave from a Russian cruise missile strike shortly before Mahamedrasulov was placed there and had not been replaced. The cell also contained a toilet and shower area; however, it was effectively impossible to take a shower either in the cell or during visits to the bathing and laundry facilities because no hot water was available.

Contact with the outside world was maintained only through meetings with his lawyers, which were permitted on any day of the week between 8:00 a.m. and 8:00 p.m., and through telephone calls with five individuals whom Ruslan Mahamedrasulov had added to the SIZO's internal telephone directory. However, these telephone conversations were recorded by the facility, as confirmed by the official response to a lawyer's request.

According to Mahamedrasulov, the food was of very poor quality. However, he was able to receive food parcels from his relatives.

Ruslan Mahamedrasulov has objectively documented health conditions, including a previous stroke, neurosurgical operations, and bodily injuries sustained during his detention. Consequently, he repeatedly requested medical assistance from the SIZO administration, particularly because of severe headaches and the deterioration of his overall health. Medical assistance was often not provided promptly and, in a number of cases, was delivered only several days after the request had been made. The defence has not been provided with any information indicating that his complaints were properly recorded or that they were addressed without delay.

These circumstances may indicate a breach of the State's obligation to ensure adequate medical care for a person who is under its complete control. This obligation arises from Article 29 of the Constitution of Ukraine, the provisions of criminal procedural legislation, and the well-established case law of the ECtHR under Article 3 of the ECHR.

On 23 September 2025, approximately one week after the relevant application had been submitted, the SIZO administration authorised a visit by Ruslan Mahamedrasulov's treating physician and permitted him to undergo an examination at a medical facility chosen by the defence. However, the overall process of obtaining that authorisation and arranging the examination took approximately one month, which, in light of his serious neurological condition, cannot be regarded as a prompt or adequate response by the State to a request for medical assistance.

The defence also has reasonable grounds to believe that covert surveillance devices may have been installed in Ruslan Mahamedrasulov's cell and other areas where he was held. If so, this would indicate that he was subjected to continuous monitoring extending beyond ordinary security-related video surveillance. In the absence of an appropriate legal basis and the necessary procedural safeguards, such monitoring may constitute an interference with the individual's private life and may also have served as a means of exerting continuous psychological pressure.

This conclusion is based on Mahamedrasulov's personal observations, as well as findings by the Ukrainian Parliament Commissioner for Human Rights, according to which the right to privacy is not adequately protected in Kyiv SIZO. The facility has 112 surveillance cameras installed, whereas the calculated requirement for areas of mass occupancy by convicted prisoners and pre-trial detainees is only 79 cameras.

This significantly undermines the implementation of the safeguards that should be ensured by SIZO staff, particularly in cases involving the use of physical force or other coercive measures against convicted prisoners and pre-trial detainees. To remedy these deficiencies, the Ombudsman submitted recommendations to the Ministry of Justice calling for amendments to the relevant secondary legislation governing the use of video surveillance in SIZOs and penal institutions. The Ombudsman proposed clearly defining the legal grounds, procedures, and limits for the use of video surveillance, prohibiting its permanent use in cells and residential premises, and ensuring an appropriate balance between security needs and the right of persons deprived of their liberty to respect for their private life and human dignity[415].

Taken together, these circumstances indicate a number of violations of the rights of a person held in custody, including effective solitary confinement without adequate procedural justification, detention in inadequate living conditions (a cold cell, the absence of a window, the lack of hot water and any practical opportunity to shower), the absence of a shelter within the facility and the inability to access one during air raid alerts, as well as the failure to provide timely medical care to a person with serious neurological conditions. Additional risks to the protection of human rights arise from the alleged continuous surveillance through technical monitoring devices without an appropriate legal basis or procedural safeguards. Collectively, these circumstances may demonstrate the State's failure to fulfil its positive obligation to ensure humane conditions of detention and respect for the human dignity of a person under its complete control.

All of the violations described above applied equally to **Sentiabr Mahomedrasulov**. An additional factor that should have been taken into account by the investigating judges, given the State's complete control over the individual following his placement in detention, was the suspect's state of health. According to the available medical records, Sentiabr Mahomedrasulov suffered from serious health conditions and required continuous medical supervision.

By rulings of the Pecherskyi District Court of Kyiv of 17 October 2025 and the Kyiv Court of Appeal of 2 December 2025, the SIZO administration was ordered to ensure that its authorised officials complied with the courts' directions, including to "*take immediate and effective measures to arrange qualified medical care for the suspect outside the facility, where necessary, with the involvement of specialist medical practitioners*"[416].

The repeated inclusion of these obligations in judicial rulings issued at different points in time suggests that they were not properly implemented. The unjustified deprivation of liberty, combined with the failure to ensure adequate medical care, resulted in violations of several national human rights standards, including the right to respect for human dignity, the right to life, the right to healthcare, and the right to liberty and security of person.

Accordingly, the analysis of the documented cases demonstrates violations of several key standards governing criminal proceedings identified in this study, namely the standard of reasonable and individualised suspicion; the standard of the admissibility, relevance, reliability, and sufficiency of evidence; the standard of proportionality of interference with property rights; the standard of effective judicial oversight over restrictions of human rights; and the standard of respect for human dignity.

The identified violations included, inter alia, the use of unfounded suspicions, reliance on inadmissible and irrelevant evidence as the basis for procedural decisions, disproportionate interference with property rights, formalistic judicial oversight over the application of preventive measures and other procedural measures, as well as instances of arbitrary deprivation of liberty, physical violence, and the failure to ensure adequate conditions of detention. Taken together, these findings demonstrate systemic violations of criminal procedural guarantees that are incompatible with the objectives of criminal proceedings.

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415 Special Report of the Ukrainian Parliament Commissioner for Human Rights, "The State of Affairs Regarding the Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment in Ukraine in 2025". https://www.ombudsman.gov.ua/storage/app/media/uploaded-files/1-01052026-0931-spetsialna-dopovid-npm-2025-na-druk.pdf

416 Ruling of the Pecherskyi District Court of Kyiv of 17 October 2025 in Case No. 757/50824/25-к; Ruling of the Kyiv Court of Appeal of 2 December 2025: https://reyestr.court.gov.ua/Review/132454922

75th anniversary of the European Convention on Human Rights, 4 November 2025, Strasbourg. © Council of Europe, Strasbourg

CHAPTER 4.

VIOLATIONS OF THE EUROPEAN CONVENTION ON HUMAN RIGHTS IN THE DOCUMENTED CASES

The documented cases concern State interference with the exercise of fundamental human rights and freedoms. More specifically, they involve alleged violations of the rights of particular individuals occurring within the State's jurisdiction which, by their legal nature, may point to the existence of a systemic problem and create a risk of similar violations affecting others. Accordingly, these cases require assessment not only under domestic criminal and criminal procedural law but also in the light of international human rights standards, in particular the provisions of the ECHR and the case law of the ECtHR.

The documented cases indicate State interference with a number of fundamental rights guaranteed by the ECHR. Accordingly, an analysis under the Convention is necessary in order to determine whether the procedural measures employed satisfied the requirements of lawfulness, pursued a legitimate aim, were necessary in a democratic society, and were proportionate.

Such an analysis is particularly important in the context of martial law. Article 15 of the ECHR permits a State to derogate from certain obligations during a public emergency or war, provided that it informs the Secretary General of the Council of Europe of the measures taken. Ukraine submitted the relevant notifications immediately after the introduction of martial law in February 2022. In 2024, updated information was published on the Council of Europe's website, effectively reducing the list of Convention provisions from which Ukraine had derogated[417].

However, Article 15 of the ECHR is not relevant in the context of the documented cases. A notification of derogation under Article 15 does not relieve the State of its obligation to secure the rights and freedoms guaranteed by the Convention in specific circumstances. Accordingly, the actions of the public authorities in these cases must be assessed against the general standards established by the ECHR and the case law of the ECtHR.

For Ukraine, compliance with the standards of the ECHR is of fundamental importance. It forms part of the State's international legal obligations as a member of the Council of Europe, serves as a benchmark for assessing adherence to the rule of law in the context of European integration, and constitutes an indicator of the State's institutional capacity. Potential violations of the ECHR may give rise not only to individual applications before the ECtHR, but also to broader legal, institutional, and reputational consequences for the State.

This chapter provides a legal analysis of the documented cases in the light of the ECHR, with particular reference to:

- Article 3 – "Prohibition of torture";
- Article 5 – "Right to liberty and security";
- Article 6 – "Right to a fair trial";
- Article 8 – "Right to respect for private and family life";
- Article 18 – "Limitation on the use of restrictions on rights".

The remainder of this chapter is structured around the individual provisions of the ECHR. It provides a brief overview of the rights guaranteed by each provision and the criteria governing permissible restrictions as developed in the case law of the ECtHR, followed by a comparison of those standards with the factual circumstances of selected documented cases and an assessment of whether the interferences satisfied the requirements of lawfulness, necessity, and proportionality.

This chapter examines in detail only selected incidents and cases chosen to illustrate the principal legal issues. Other documented cases may likewise contain indications of interference with rights guaranteed by the ECHR, but an in-depth analysis of those cases falls outside the scope of this study. Accordingly, the review does not seek to provide an exhaustive account of every potential violation, but rather to identify the principal directions for the legal assessment of the documented events through the prism of the ECtHR's standards.

The purpose of this chapter is to determine whether the documented actions of the State authorities disclose indications of violations of the ECHR, whether they could become the subject of proceedings before the ECtHR, and whether they point to the existence of broader systemic problems within the criminal justice system.

417 "On the Derogation from Obligations under the Convention for the Protection of Human Rights and Fundamental Freedoms", Cabinet of Ministers of Ukraine, 29 April 2024: https://www.kmu.gov.ua/news/shchodo-vidstupu-vid-zoboviazan-za-konventsiieiu-pro-zakhyst-prav-liudyny-i-osnovopolozhnykh-svobod

Article 3 of the ECHR – Prohibition of torture

"No one shall be subjected to torture or to inhuman or degrading treatment or punishment".

The case law of the ECtHR distinguishes between three principal forms of prohibited treatment: torture, inhuman treatment (or punishment), and degrading treatment (or punishment). The distinction between them depends primarily on the severity of the suffering inflicted, the nature of the conduct, the duration of its effects, and the existence of a specific purpose.

Torture constitutes the most serious form of prohibited treatment. The ECtHR defines it as deliberate inhuman treatment causing very serious and cruel physical or mental suffering, usually inflicted for a specific purpose, such as obtaining information or a confession, punishment, intimidation, or discrimination. The prohibition of torture has the status of a jus cogens norm of international law, from which no derogation is permitted. In its case law, the ECtHR has, inter alia, classified as torture prolonged beatings and the use of physical and psychological pressure during interrogation[418], force-feeding in the absence of medical necessity, and the combination of physical violence[419], and psychological pressure for the purpose of punishment or obtaining information[420].

Within the meaning of Article 3 of the ECHR, inhuman treatment or punishment is treatment that causes serious physical or mental suffering, may be premeditated, and may continue for a certain period of time, but does not attain the particular level of cruelty characteristic of torture. The distinction between inhuman treatment and torture is determined primarily by the intensity of the suffering inflicted and the existence of a specific purpose behind it. By contrast, degrading treatment or punishment exists where the acts or conditions of treatment humiliate or debase an individual, demonstrate a lack of respect for their human dignity, give rise to feelings of fear, anguish, or inferiority, or are capable of breaking their moral or physical resistance. For treatment to be classified as degrading, it is sufficient that it attain the minimum level of severity; proof of a specific intention to humiliate the individual is not required.

Ahead of the search of one of the NABU employees on 21 July 2025.
Photo credit: Ukrainska Pravda

During the searches conducted on 21 July 2025, investigative measures in a number of cases involved the deployment of a large number of armed law enforcement officers in tactical gear and were accompanied by the use of physical force and special means. This created an atmosphere of coercion and psychological pressure directed at individuals who offered no active resistance and were already under the effective control of State agents. In particular, the cases of **Ruslan Mahamedrasulov** and **Ivan Kravchuk**, heads of NABU detective units, as well as senior NABU detectives **Oleksii Diadenko** and **Yurii Tsvietkov**, and NABU detective **Viktor Husarov**, should be assessed in the light of the criteria established in the ECtHR's case law concerning the severity of the suffering inflicted, the proportionality of the force used, the presence of elements of psychological pressure, and the particular vulnerability of the individuals concerned.

The case of **Ruslan Mahamedrasulov**, Head of a NABU detective unit, is particularly illustrative in this regard. During the search, a group of more than ten armed officers forced their way into his home, threw him to the floor, handcuffed him, and struck him in the torso and kidney area. At the time, he was

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418 Case of Bati and others v. Turkey, Applications nos. 33097/96 and 57834/00, Judgment (ECtHR) [Extracts], 3 June 2004: https://hudoc.echr.coe.int/eng?i=001-61805

419 Case of Nevmerzhitsky v. Ukraine, Application no. 54825/00, Judgment (ECtHR), 5 April 2005: https://hudoc.echr.coe.int/eng?i=001-125783

420 Case of El-masri v. "the Former Yugoslav Republic of Macedonia", Application no. 39630/09, Judgment (ECtHR), 13 December 2012: https://hudoc.echr.coe.int/eng?i=001-115621

unarmed, was inside his own home, offered no resistance, opened the door voluntarily, and objectively posed no threat to the law enforcement officers.

Under the standards established by Article 3 of the ECHR, physical force may be used only where it is absolutely necessary and strictly proportionate to the individual's conduct. The use of force against a person who is already under the complete control of law enforcement officers and offers no resistance is regarded as excessive. This principle was reaffirmed by the Grand Chamber of the ECtHR in Bouyid v. Belgium[421], in which the Court held that any use of physical force against a person under the control of law enforcement officers that is not made strictly necessary by that person's own conduct amounts to an affront to human dignity and is, in principle, incompatible with Article 3 of the ECHR, even in the absence of serious bodily injuries. In such circumstances, the infliction of bodily harm may amount to inhuman treatment within the meaning of the ECHR.

Separate consideration should also be given to the use of handcuffs and other special equipment, including shields and strobe lights. In the absence of active or armed resistance, their use may be regarded as disproportionate and as creating an atmosphere of intimidation and humiliation, thereby displaying the characteristics of degrading treatment within the meaning of Article 3 of the ECHR.

In assessing these circumstances, particular account must be taken of **Ruslan Mahamedrasulov**'s individual vulnerability. As a result of the preliminary collection of information about the Head of a NABU detective unit, the law enforcement authorities should have been aware that he had previously suffered a stroke and undergone two major brain surgeries. During both his detention and subsequent custody, he also informed the authorities that he had serious health problems and corresponding medical needs. Despite this, and notwithstanding the physical force used against him during the search, he was detained on 21 July 2025 and taken to the Investigation Department of the Main Directorate of the SSU in the city of Kyiv and the Kyiv region. Furthermore, during his subsequent detention, he was not provided with adequate medical care or appropriate medical treatment.

On the same day, **Sentiabr Mahomedrasulov**, the father of the Head of a NABU detective unit, was also notified of suspicion in the same criminal proceedings[422] and placed in pre-trial detention. Sentiabr likewise suffers from serious health conditions, including a cardiac condition requiring surgical intervention due to an abdominal aortic aneurysm. In addition, while in detention, his cataract deteriorated, yet he was not provided with appropriate medical care.

During their detention, the defence repeatedly applied for the preventive measure to be varied in view of the health conditions of **Ruslan Mahamedrasulov** and his father, or alternatively for them to be provided with adequate medical care. However, these requests were ignored for a prolonged period and were not effectively considered until 3 December 2025.

According to the ECtHR's case law, the victim's state of health is a relevant factor in determining whether the treatment attained the minimum level of severity required under Article 3 of the ECHR. The use of physical force against a person with serious medical conditions, together with the failure to provide adequate medical care following the infliction of injuries, may aggravate the suffering caused and constitute a separate aspect of a violation of Article 3 of the ECHR, in light of the State's positive obligation to provide appropriate medical care to persons under its control. In Sarban v. Moldova[423] Nevmerzhitsky v. Ukraine[424] the ECtHR emphasised that the failure to provide necessary medical treatment to persons under the control of the State, or the application of compulsory medical measures in the absence of genuine medical necessity, may in itself constitute a violation of Article 3 of the ECHR.

Following his detention, Ruslan Mahamedrasulov was placed in Kyiv SIZO, where he remained in pre-trial detention for approximately four and a half months. According to the information available, he was held alone in a cell measuring approximately 2×3 metres under continuous video surveillance and in inadequate living conditions, including a damaged window and the absence of suitable conditions

421 Case of Bouyid v. Belgium, Application no. 23380/09, Judgment (ECtHR), 28 September 2015: https://hudoc.echr.coe.int/eng?i=001-157670.

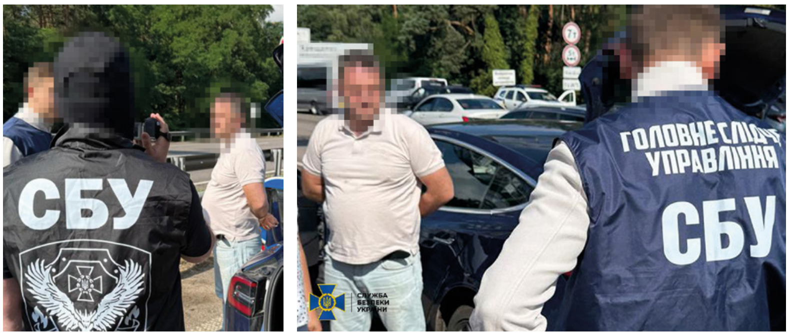
422 Criminal Code of Ukraine No. 2341-III of 5 April 2001, Articles 14, 28, and 111-2: https://zakon.rada.gov.ua/laws/show/2341-14#Text

423 Case of Sarban v. Moldova, Application no. 3456/05, Judgment (ECtHR), 4 October 2005: https://hudoc.echr.coe.int/eng?i=001-70371

424 Case of Nevmerzhitsky v. Ukraine, Application no. 54825/00, Judgment (ECtHR), 5 April 2005: https://hudoc.echr.coe.int/eng?i=001-125783

for rest. In addition, meetings with his lawyers took place in rooms equipped with video surveillance, potentially compromising the confidentiality of communications with lawyers.[425].

The issue of inadequate detention conditions in Ukraine has been assessed by the ECtHR as a systemic problem, most notably in Sukachov v. Ukraine[426]. In that judgment, the Court held that detention in conditions characterised by insufficient personal space, inadequate ventilation, lighting, and sanitary facilities, together with the absence of effective domestic remedies, amounted to degrading treatment within the meaning of Article 3 of the ECHR. The ECtHR also emphasised the structural nature of the problem of inadequate conditions in Ukrainian SIZOs and the State's obligation to ensure that persons deprived of their liberty are detained in conditions compatible with respect for human dignity.



The detention of Viktor Husarov at the entrance to Kyiv on 21 July 2025.
Photo credit: Security Service of Ukraine

The circumstances surrounding the use of physical force against NABU detective **Viktor Husarov** likewise require assessment under Article 3 of the ECHR. During his detention on 21 July 2025, he was beaten and forced to disclose the passwords to his mobile phone. After the blows had been inflicted, his movement was restrained with plastic cable ties. Information about his detention was accompanied by the widespread dissemination in the media of photographs and video footage depicting the moment of his apprehension. Pursuant to a court order, Viktor Husarov was placed in pre-trial detention in Kyiv SIZO, with the period of detention being extended on several occasions. He was held in a single-occupancy cell under continuous video surveillance for more than four months, during which the cell lights remained switched on twenty-four hours a day. It is also reported that he was not provided with adequate medical care for the injuries sustained during his detention, both immediately after being taken into custody and throughout his subsequent detention in SIZO, despite the existence of court orders requiring that he undergo a medical examination[427].

According to the defence, **Viktor Husarov** suffered from ulcerative lesions of the lower limbs, elevated arterial and venous blood pressure accompanied by bleeding from his ears, and had previously contracted COVID-19. After he complained about the lack of medical care, medication was left in his cell during his absence without any prior medical examination. No instructions regarding its use were provided. Such circumstances may have created additional risks to his health and should be assessed in the light of the State's positive obligation to ensure adequate conditions of detention in accordance with the standards of Article 3 of the ECHR.

The circumstances surrounding the search of **Ivan Kravchuk**, Head of a NABU detective unit, likewise require assessment in the light of the ECtHR's criteria of "absolute necessity", "proportionality of the use of force", and the "minimum level of severity". According to his account, after he opened the door, he was abruptly pulled into the corridor, his face was slammed against the wall, and his hands were secured behind his back with plastic cable ties. At the time the force was used, he was wearing only his underwear, offered no resistance, and posed no threat. Under the standards developed under Article 3 of the ECHR, any use of physical force against a person under the control of law enforcement authorities must satisfy the test of strict necessity. Failing that, such force is regarded as degrading to human dignity and constitutes a violation of Article 3 of the ECHR, as confirmed by the ECtHR's case law, including Ribitsch v. Austria[428].

425 "Halushchenko Knew About the Creation of Intolerable Conditions in the SIZO for Detective Ruslan Mahamedrasulov, Says SAPO Prosecutor", ZMINA, 12 November 2025: https://surl.li/rvduuq

426 Case of Sukachov v. Ukraine, Application no. 14057/17, Judgment (ECtHR), 30 January 2020: https://hudoc.echr.coe.int/fre?i=001-200448

427 "Court Postpones the Hearing in Viktor Husarov's Case Due to the Deterioration of His Health", ZMINA, 9 December 2025: https://zmina.info/news/sud-perenis-rozglyad-spravy-gusarova-cherez-pogirshennya-jogo-stanu-zdorovya/

428 Case of Ribitsch v. Austria, Application no. 18896/91, Judgment (ECtHR), 4 December 1995: https://hudoc.echr.coe.int/eng?i=001-57964.

Particular attention should also be paid to the use of plastic cable ties instead of the restraint devices provided for by law. According to the ECtHR's case law, the use of physical restraints must be justified by the individual's conduct. The disproportionate use of such restraints may amount to degrading treatment. Ivan Kravchuk remained restrained for approximately 15 minutes and experienced physical pain, both of which are relevant factors in assessing the severity of the treatment under the ECtHR's case law.

Of additional significance is the fact that, after his liberty had been physically restrained, his request to have his hands released was refused while he was simultaneously informed that he had not been detained. The combination of effective physical control over an individual with legal uncertainty regarding that person's procedural status may intensify feelings of helplessness and humiliation and is a factor taken into account by the ECtHR when assessing treatment under Article 3 of the ECHR.

It is also significant that Ivan Kravchuk's wife was forcibly deprived of her mobile phone, which was unlocked through the use of physical force. In the absence of any apparent necessity, such conduct may constitute a separate aspect of degrading treatment and may also have intensified the psychological pressure exerted on the detective in the presence of his family members. In addition, Kravchuk states that he was deliberately shown photographs and video recordings of the searches conducted at the homes of his colleagues, which may indicate an attempt to exert psychological pressure and create an atmosphere of intimidation relevant to the assessment of the treatment under Article 3 of the ECHR.

Physical force was also used against NABU Senior Detective **Yurii Tsvietkov**. According to his account, on 21 July 2025, in the parking area of his residential building, unidentified armed and masked individuals wearing uniforms bearing the insignia of the SSU subjected him to physical violence, forcibly removed him from his vehicle, and repeatedly struck him on various parts of his body. At the same time, they threatened him and compelled him to disclose the password to his mobile phone and subsequently to sign a detention report. These actions were accompanied by threats of further violence and resulted in bodily injuries confirmed by medical records. According to the ECtHR's case law, the use of physical violence to obtain information or to compel an individual to perform procedural acts constitutes treatment incompatible with the requirements of Article 3 of the ECHR[429].

Physical force was also used during the search of the home of NABU Senior Detective **Oleksii Diadenko**. According to his account, on 21 July 2025, law enforcement officers entered the flat he rented after loudly demanding that the door be opened and shouting, "*Break the door down*". Although he offered no resistance, they forced him to the floor, twisted his arms behind his back, and applied physical pressure, including pressing a knee into his kidney area and twisting his arm while demanding that he disclose the password to his mobile phone. According to his account, the pain inflicted forced him to reveal the password, despite the fact that he offered no resistance and remained under the complete control of the law enforcement officers.

Taken together, the accounts provided by the NABU detectives indicate that the use of physical force in the absence of resistance, the use of physical restraints, coercion to disclose passwords to mobile devices, and the creation of an atmosphere of psychological pressure during investigative measures may have reached the minimum level of severity required for the assessment of such conduct under Article 3 of the ECHR.

Further significance attaches to the failure to provide adequate medical care following the use of physical force, the prolonged detention of individuals in isolation under continuous video surveillance, and the use of physical coercion to obtain access to digital devices. According to the ECtHR's case law, these are all factors capable of increasing the intensity of the physical and psychological suffering inflicted.

Taken together, these circumstances, particularly given that they were applied simultaneously to several NABU detectives, may indicate the existence of inhuman or degrading treatment within the meaning of Article 3 of the ECHR. They also require further legal assessment in the light of the standards established by the ECtHR, in particular as regards the proportionality of the use of force

429 Case of Aksoy v. Turkey, application no. 21987/93, judgment (ECtHR), 18 December 1996: https://hudoc.echr.coe.int/eng?i=001-58003, Case of Bati and others v. Turkey, Applications nos. 33097/96 and 57834/00, Judgment (ECtHR) [Extracts], 3 June 2004: https://hudoc.echr.coe.int/eng?i=001-61805

against individuals under the control of law enforcement authorities, the State's obligation to ensure adequate conditions of detention and appropriate medical care, and the prohibition of using physical or psychological coercion to obtain information.

Article 5 of the ECHR – Right to liberty and security

"Everyone has the right to liberty and security of person. No one shall be deprived of his liberty save in the following cases and in accordance with a procedure prescribed by law".

The primary purpose of this provision is to protect individuals against arbitrary interference by the State with their physical liberty.

In the ECtHR's case law, the concept of "deprivation of liberty" has an autonomous meaning and is assessed not only on the basis of an individual's formal procedural status, but also in the light of the factual circumstances of the case, including the degree of control exercised by law enforcement authorities over the individual and whether they had a genuine possibility of leaving the place where they were held. This principle has been consistently reaffirmed by the ECtHR, including in Creangă v. Romania[430]. Even a short-term restriction on an individual's freedom of movement during investigative measures may fall within the scope of Article 5 of the ECHR where the person is, in practice, under the complete control of law enforcement authorities without that status having been properly formalised. The ECtHR has consistently emphasised that any deprivation of liberty must not only be formally lawful but must also be free from arbitrariness, based on sufficient factual grounds, and proportionate to the legitimate aim pursued.

In the context of the documented events of 21 July 2025, these standards are of particular importance in assessing the circumstances surrounding the de facto restriction of the freedom of movement of anti-corruption actors and their relatives, including **Viktor Husarov**, **Ruslan Mahamedrasulov** and his father, **Sentiabr Mahomedrasulov**, **Illia Statura**, and **Yurii Tsvietkov**, during the searches.

Accordingly, **Viktor Husarov**, **Ruslan Mahamedrasulov**, and **Sentiabr Mahomedrasulov**, the father of the latter, were officially arrested. Under domestic law, arrest by an authorised official without a prior court order is permissible only in exceptional circumstances expressly prescribed by law and must be accompanied by the immediate and proper procedural formalisation of the arrest[431]. Following their arrest, they were placed in SIZO, where they remained in pre-trial detention from 21 July until December 2025 (**Sentiabr Mahomedrasulov** until 2 December 2025, **Ruslan Mahamedrasulov** until 3 December 2025, and **Viktor Husarov** until 10 December 2025) in criminal proceedings concerning serious offences, including offences against the foundations of national security.

An analysis of the case materials indicates that, in **Viktor Husarov**'s case, the actual deprivation of liberty commenced before the time recorded in the detention report, namely from the moment armed, masked officers began searching him, used physical force against him, and restrained him with plastic cable ties. From that point onwards, he remained under the complete control of the law enforcement authorities and had no possibility of leaving the place where he was being held.

In **Ruslan Mahamedrasulov**'s case, the restriction of his liberty arose at the very outset of the search, when he was placed under the continuous physical control of law enforcement officers, handcuffed, deprived of any possibility of leaving the premises freely, and not promptly informed of the grounds for the suspicion against him or of his procedural status. According to the ECtHR's approach, such circumstances may amount to a de facto deprivation of liberty within the meaning of Article 5 of the ECHR, irrespective of the formal recording of the arrest, since the decisive factors are the actual moment at which control over the individual was established and the absence of any genuine possibility of leaving the place where they were held[432].

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430 Case of Creangă v. Romania, Application no. 29226/03, Judgment (ECtHR), 23 February 2012: https://hudoc.echr.coe.int/eng?i=001-109226.

431 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 208: https://zakon.rada.gov.ua/laws/show/4651-17#Text

432 Case of Creangă v. Romania, Application no. 29226/03, Judgment (ECtHR), 23 February 2012: https://hudoc.echr.coe.int/eng?i=001-109226.

Accordingly, the discrepancy between the actual moment of deprivation of liberty and the time recorded in the detention report in Viktor Husarov's case, together with the failure to inform Ruslan Mahamedrasulov without delay of the reasons for the restriction of his liberty, may indicate non-compliance with the requirements of lawful arrest and the guarantees under Article 5 of the ECHR, including the State's obligation to inform a person promptly of the reasons for their deprivation of liberty.

According to Ruslan Mahamedrasulov, he remained handcuffed for several hours during the search.

Photo credit: Security Service of Ukraine

Alongside the official arrests, there were also documented instances of de facto deprivation of liberty without proper procedural formalisation. In particular, Detective **Yurii Tsvietkov** was apprehended in the parking area near his residence before the search began and was forcibly taken to his flat to secure his presence during the investigative measures. A similar incident occurred in relation to detective **Illia Statura**, who, following the searches, was kept in a law enforcement vehicle for approximately three hours without any possibility of leaving, while awaiting further procedural decisions.

Particular significance also attaches to the detention of **Sentiabr Mahomedrasulov**, the father of NABU detective Ruslan Mahamedrasulov. Although he is not an anti-corruption actor, he was placed in SIZO in connection with the same criminal proceedings. According to the ECtHR's approach, any deprivation of liberty must be based on an individualised "reasonable suspicion" relating to the specific person concerned and must satisfy the requirement of protection against arbitrariness. In the absence of an adequate individualised justification, the simultaneous detention of a detective and his closest family member may indicate a risk that deprivation of liberty was used as a means of indirect procedural or psychological pressure within the meaning of the standards established by the ECHR.

The circumstances surrounding the prolonged pre-trial detention of NABU Detectives **Viktor Husarov** and **Ruslan Mahamedrasulov**, who remained in SIZOs for approximately four months in 2025, likewise require separate assessment under Article 5 of the ECHR.

An analysis of the materials relating to **Viktor Husarov** indicates that the pre-trial investigation was conducted within criminal proceeding No. 22025000000000505 of 23 April 2025, which had been severed from criminal proceeding No. 42023000000001363 of 17 August 2023. The materials relied upon by the prosecution to substantiate the suspicion were derived predominantly from other criminal proceedings and did not contain individualised information concerning specific acts by **Viktor Husarov** directed at undermining the national security of Ukraine. According to the available information, some of those materials were obtained in the presence of significant procedural defects, including the conduct of covert investigative (search) actions without proper confirmation of judicial authorisation and without compliance with the applicable procedural requirements. In the absence of new, individualised evidence within the proceedings, the use of materials from other criminal proceedings without their proper procedural regularisation may cast doubt on the sufficiency of the factual basis for prolonged deprivation of liberty under the "reasonable suspicion" standard established by Article 5 of the ECHR.

An analysis of the grounds for the suspicion against **Ruslan Mahamedrasulov** indicates that it was based largely on assertions by officers of the SSU that he had allegedly been preparing to transfer material resources to representatives of a private company registered in the Russian Federation, without identifying specific factual evidence capable of establishing the essential elements of the criminal offence under Article 111-2 of the CC of Ukraine, in particular actual assistance to the aggressor State, its armed formations, or its occupation administration. According to the ECtHR's approach, the absence of sufficient factual material capable of objectively substantiating the existence of a “reasonable suspicion” may indicate that continued detention is incompatible with the requirements of Article 5 of the ECHR.

In these circumstances, the prolonged pre-trial detention of **Viktor Husarov** and **Ruslan Mahamedrasulov** must be assessed in the light of the requirements of lawfulness, the sufficiency of the grounds for suspicion, and the protection against arbitrary deprivation of liberty guaranteed by Article 5 of the ECHR. According to the ECtHR’s case law, a “reasonable suspicion” within the meaning of Article 5 § 1(c) of the ECHR must be based on facts or information capable of satisfying an objective observer that the person concerned may have committed the offence, rather than on mere assumptions or general assertions advanced by the prosecution[433]. In the absence of such factual material, prolonged deprivation of liberty may indicate that the preventive measure imposed failed to satisfy the requirement of lawfulness under Article 5 of the ECHR.

Article 6 of the ECHR – Right to a fair trial

“Everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law...”

Article 6 of the ECHR is one of the fundamental guarantees of the rule of law. The ECtHR has consistently emphasised that compliance with the requirements of a fair trial must be assessed in the light of the proceedings as a whole, rather than by reference to individual stages in isolation[434].

In the context of the events of 2025, particular importance attaches to assessing whether the procedural guarantees provided for under Article 6 of the ECHR were respected during the large-scale investigative actions carried out against NABU employees.

According to the ECtHR’s judgment in Salduz v. Turkey[435], the right of access to a lawyer arises from the moment of the first detention or police questioning, rather than only at the judicial stage. According to the accounts provided by NABU employees, computers and mobile devices were seized during the searches without allowing them to obtain copies of the data necessary for their defence and without ensuring timely access to their lawyers. These circumstances interfered with the right to a defence at the most critical stage of the pre-trial proceedings. Furthermore, within the meaning of Article 6 § 3(b) of the ECHR, the restrictions on access to data and case materials at the pre-trial stage substantially compromised the defence’s ability to have adequate time and facilities for the effective preparation of its case. As the ECtHR has consistently held, the rights of the defence must be “*practical and effective, not theoretical or illusory*”.

According to the accounts of NABU detectives, during the searches and arrests carried out on 21 July 2025, law enforcement authorities in a number of instances failed to properly inform those concerned of the legal basis for the investigative actions or of their procedural status. Some of the searches and arrests were conducted without a prior judicial order, even though arrest without a court order is permissible only in exceptional circumstances expressly prescribed by law[436], and must be accompanied by the immediate and proper procedural formalisation of the arrest.

Moreover, the arrests themselves appear to have been carried out without adequate justification. In particular, in the documented cases, as of the preparation of this study, there is no individualised reasoning demonstrating the necessity and urgency of carrying out arrests without prior judicial authorisation, although such reasoning is essential to justify recourse to this exceptional procedure. Furthermore, several accounts indicate that information concerning the criminal proceedings was provided only after the searches had commenced and without adequate specification of the grounds for the proceedings. This may indicate a failure to comply with the guarantee of prompt information concerning the nature and cause of the accusation within the meaning of Article 6 of the ECHR.

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433 Case of Fox, Campbell and Hartley v. The United Kingdom, Application no. 12244/86; 12245/86; 12383/86, Judgment (ECtHR), 30 August 1990: https://hudoc.echr.coe.int/eng?i=001-57721

434 Case of Barberà, Messegué and Jabardo v. Spain, Application no. 10590/83, Judgment (ECtHR), 6 December 1988: https://hudoc.echr.coe.int/eng?i=001-57429.

435 Case of Salduz v. Turkey, Application no. 36391/02, Judgment (ECtHR), 27 November 2008: https://surl.lt/jnnsvf.

436 Criminal Procedure Code of Ukraine No. 4651-VI of 13 April 2012, Article 208: https://zakon.rada.gov.ua/laws/show/4651-17#Text

In **Ruslan Mahamedrasulov**'s case, he was informed of the criminal proceedings only after the search had already commenced, without being given an adequate explanation of the factual and legal grounds for the investigative actions concerned. These circumstances require assessment in the light of the guarantee under Article 6 § 3(a) of the ECHR, which requires that an accused person be informed promptly and in detail of the nature and cause of the accusation against them.

According to the ECtHR's case law, accurate and complete information concerning the accusation is one of the essential prerequisites of a fair trial. The right guaranteed by Article 6 of the ECHR encompasses notification of both the "cause" of the accusation, namely the factual circumstances on which it is based, and its "nature", namely the legal characterisation of the alleged conduct. The ECtHR has also emphasised that the obligation to provide adequate information rests with the prosecution and that the accused must actually receive such information, rather than merely being deemed to have been informed.

Of particular importance in this context is the principle of timely notification, as information concerning the accusation must be provided sufficiently early to enable the individual to organise their a defence effectively and obtain legal assistance. In its judgment in Mattoccia v. Italy, the ECtHR emphasised that delayed or insufficiently specific notification of the accusation may violate the guarantees of Article 6 of the ECHR[437].

In the present case, information concerning the criminal proceedings was communicated only after the search had already commenced, at a time when the investigative actions were already under way and documents and data storage devices were being seized by law enforcement authorities. In these circumstances, the individual was significantly restricted in their ability to obtain legal assistance in a timely manner, monitor the conduct of the investigative actions, and properly document any procedural irregularities arising during the search.

Accordingly, the delay in informing the individual of the criminal proceedings and the failure to provide adequate particulars of their basis may indicate a restriction on the effective exercise of the right to defence at the initial stage of the proceedings and therefore require assessment as to their compatibility with the fair trial guarantees enshrined in Article 6 of the ECHR.

Under Article 6 § 3(b) of the ECHR, everyone has the right to adequate time and facilities for the preparation of their defence, which includes effective access to legal assistance from the outset of the initial investigative actions. According to the accounts provided by NABU employees, computers and mobile devices were seized during the searches without allowing them to obtain copies of the data necessary for their defence and without ensuring timely access to their lawyers. These circumstances may have significantly restricted their ability to exercise the right to a defence effectively at the initial stage of the proceedings.

Article 6 § 2 of the ECHR guarantees the presumption of innocence. In **Ruslan Mahamedrasulov**'s case, information concerning the suspicion against him and the circumstances of the criminal proceedings was disseminated publicly before the investigative actions had been completed and before any determination of guilt by a court. The ECtHR has emphasised that public statements by State authorities or the demonstrative presentation of procedural actions that create a public perception of an individual's guilt before a conviction may amount to a violation of this guarantee[438].

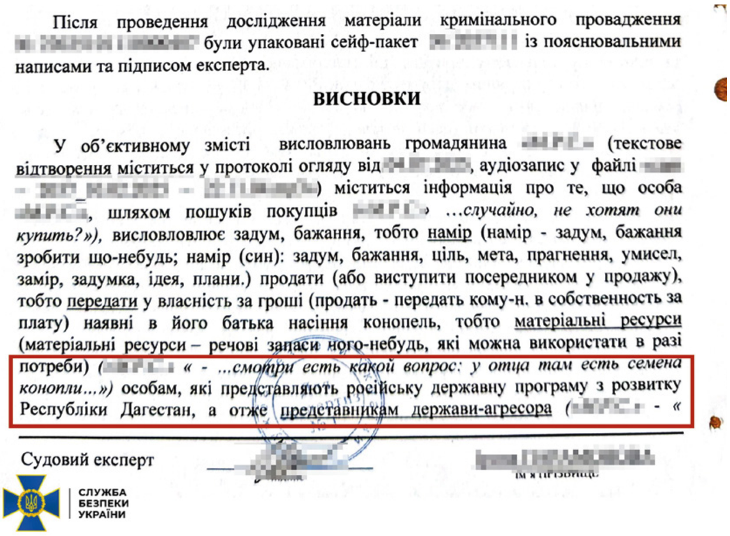
Particular significance under Article 6 of the ECHR also attaches to the manner in which the evidential basis was established in the criminal proceedings against **Viktor Husarov** and **Ruslan Mahamedrasulov**. In **Viktor Husarov**'s case, the decision to impose a preventive measure was based on materials originating from other criminal proceedings, the admissibility of which was not properly examined within the proceedings in question. The use of such materials may have restricted the defence's ability to examine and challenge the prosecution's evidence effectively and may have undermined procedural equality between the parties[439].

437 Case of Mattoccia v. Italy, Application no. 23969/94, Judgment (ECtHR), 25 July 2000: https://hudoc.echr.coe.int/eng?i=001-58764

438 Case of Allenet De Ribemont v. France, Application no. 15175/89, Judgment (ECtHR), 10 February 1995: https://hudoc.echr.coe.int/eng?i=001-57914.

439 Case of Dombo Beheer B.V. v. The Netherlands, Application no. 14448/88, Judgment (ECtHR), 27 October 1993: https://hudoc.echr.coe.int/eng?i=001-57850

In **Ruslan Mahamedrasulov**'s case, further doubts as to the fairness of the proceedings arise from the reliance on a forensic linguistic examination of a transcript of a conversation as a key item of evidence. By its nature, that examination was incapable of establishing whether the transcript accurately reflected the contents of the audio recording, and it was completed within an exceptionally short period of time. According to the ECtHR's case law, even in cases concerning national security, restrictions on the defence's access to the case file must be prescribed by law, proportionate, and must not negate the principle of equality of arms[440].



Після проведення дослідження матеріали кримінального провадження [redacted] були упаковані сейф-пакет [redacted] із пояснювальними написами та підписом експерта.

ВИСНОВКИ

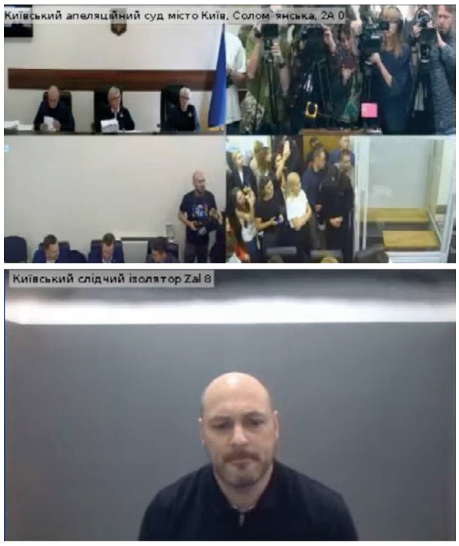
У об'єктивному змісті висловлювань громадянина [redacted] (текстове відтворення міститься у протоколі огляду від [redacted], аудіозапис у файлі [redacted]) міститься інформація про те, що особа [redacted], шляхом пошуків покупців [redacted]» *…случайно, не хотят они купить?»),* висловловлює задум, бажання, тобто намір (намір - задум, бажання зробити що-небудь; намір (син): задум, бажання, ціль, мета, прагнення, умисел, замір, задумка, ідея, плани.) продати (або виступити посередником у продажу), тобто передати у власність за гроші (продать - передать кому-н. в собственность за плату) наявні в його батька насіння конопель, тобто матеріальні ресурси (матеріальні ресурси – речові запаси чого-небудь, які можна використати в разі потреби) (*[redacted] « - …смотри есть какой вопрос: у отца там есть семена конопли…»)* особам, які представляють російську державну програму з розвитку Республіки Дагестан, а отже представникам держави-агресора ([redacted] - «

Судовий експерт [redacted]

СЛУЖБА БЕЗПЕКИ УКРАЇНИ

Excerpt from the findings of the State forensic semantic and textual examination in the case of Ruslan Mahamedrasulov, published by the SSU on 22 August 2025.

Photo credit: Security Service of Ukraine



The Kyiv Court of Appeal adjourned the hearing of Ruslan Mahamedrasulov's appeal against his pre-trial detention because he was not transported from Kyiv SIZO to the court. Mahamedrasulov participated in the hearing by video link, 25 August 2025.

Photo credit: Anti-Corruption Action Center

At the same time, the circumstances surrounding the examination of **Ruslan Mahamedrasulov**'s appeals against the imposition of pre-trial detention likewise raise doubts as to compliance with the procedural guarantees enshrined in Article 6 of the ECHR. A full appellate review of the preventive measure was conducted only on the fourth attempt, following the repeated adjournment of the appeal hearings.

Taken together, the use of evidence without proper procedural scrutiny, the reliance on expert opinions of questionable scope and competence as the basis for the suspicion, the restriction of access to legal assistance at the initial stages of the proceedings, and the public dissemination of information concerning the suspicion before any determination of guilt by a court indicate a risk that certain procedural actions were incompatible with the guarantees of a fair trial and the presumption of innocence enshrined in Article 6 of the ECHR.

Article 8 of the ECHR – Right to respect for private and family life

"1. Everyone has the right to respect for his private and family life, his home and his correspondence.

2. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others".

The ECtHR's case law emphasises that the concepts of "private life", "home", and "correspondence" have an autonomous and broad meaning. They cover, in particular, a person's professional activities, digital devices, personal data and electronic communications, as well as residential and professional

440 Case of Moiseyev v. Russia, Application no. 62936/00, Judgment (ECtHR), 9 October 2008: https://hudoc.echr.coe.int/eng

premises, regardless of the manner in which they are used or the legal status of possession. In Niemietz v. Germany[441], the ECtHR held that the concepts of "private life" and "home" may extend to professional premises and that a search conducted without adequate procedural safeguards constitutes an interference with the sphere protected by Article 8 of the ECHR. Accordingly, searches of homes, the seizure of personal belongings and digital storage devices, and access to mobile devices and communications, including work-related communications, constitute interference with the right to respect for private life within the meaning of Article 8 of the ECHR and must be assessed in terms of their lawfulness, necessity, and proportionality.

The ECtHR has already assessed similar procedural risks in Korniyets and Others v. Ukraine, where it found a violation of Article 8 of the ECHR on account of searches carried out without prior judicial authorisation and the subsequent formal retrospective legalisation of those actions without proper judicial oversight[442]. The ECtHR emphasised that even subsequent judicial approval does not provide sufficient safeguards against arbitrary interference where the court does not conduct a thorough review of the grounds for and proportionality of the search.

Similar procedural concerns arise in **Ruslan Mahamedrasulov**'s case. According to the available information, the search was conducted without adequate specification of its legal basis or of the scope of the material to be seized. The seizure of mobile phones and computer equipment without clearly limiting the scope of the search created a risk of access to a substantial volume of personal data unrelated to the subject matter of the criminal proceedings, which may indicate insufficient procedural safeguards against arbitrary interference with private life within the meaning of Article 8 of the ECHR.

During the documented events of July 2025, numerous searches were carried out at the homes of anti-corruption actors, accompanied by the seizure of personal belongings and digital devices, as well as interference with their private and family life without proper judicial authorisation.

As already noted, the searches were carried out in the early morning by armed, masked officers and involved the forced entry into private homes. In the majority of cases, those concerned were not properly informed of the grounds for the criminal proceedings or of their procedural status. According to the ECtHR's case law, even a search carried out pursuant to formal judicial authorisation constitutes an interference with the rights protected by Article 8 of the ECHR and therefore requires adequate procedural safeguards against arbitrary State interference, as well as compliance with the requirements of lawfulness, necessity, and proportionality. In Buck v. Germany[443], the ECtHR held that a search may amount to a disproportionate interference with the right to respect for one's home where the measures employed are not commensurate with the nature of the criminal proceedings and are not supported by adequate justification.

An important aspect of Article 8 of the ECHR is the protection of the confidentiality of communications and personal data. In its case law, the ECtHR has recognised that access to digital data constitutes a particularly intrusive interference with private life, given that modern electronic devices contain extensive amounts of personal information. During the searches, law enforcement authorities seized mobile phones, computers, and other data storage devices, thereby creating a risk of access to a substantial volume of personal data unrelated to the subject matter of the criminal investigation. In Guyvan v. Ukraine[444], the ECtHR emphasised that the conduct of a search and the seizure of property without sufficient specification of the object of the search and without adequate procedural safeguards may amount to a disproportionate interference with the right to respect for private life.

Of particular significance in this context are reports concerning the dissemination of private material from a mobile phone seized by law enforcement authorities during investigative actions. In particular, according to publicly available information, in December 2025, private intimate photographs from

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441 Case of Niemietz v. Germany, Application no. 13710/88, Judgment (ECtHR), 16 December 1992: https://hudoc.echr.coe.int/eng?i=001-57887

442 Case of Korniyets and Others v. Ukraine, Application no. 2599/16, Judgment (ECtHR), 10 July 2025: https://hudoc.echr.coe.int/?i=001-244003

443 Case of Buck v. Germany, Application no. 41604/98, Judgment (ECtHR), 28 April 2005: https://hudoc.echr.coe.int/eng?i=001-68920

444 Case of Guyvan v. Ukraine, Application no. 46704/16, Judgment (ECtHR), 6 November 2025: https://hudoc.echr.coe.int/eng?i=001-245689

the mobile phone of Vitaliy Shabunin, Chair of AntAC[445], were reportedly circulated through Telegram channels while the device was in the custody of the law enforcement authorities following its seizure during a search. Given that responsibility for safeguarding seized material rests with the pre-trial investigation authorities, such circumstances may indicate a failure to ensure the confidentiality of personal data and constitute a further aspect of interference with the right to respect for private life in Ukraine within the meaning of Article 8 of the ECHR.

The documented circumstances surrounding the searches of the homes of NABU employees and **Vitaliy Shabunin**, the seizure of digital devices without adequate specification of the scope of the information to be examined, and the reports concerning the dissemination of private material obtained during the investigative actions indicate a serious interference with the individuals' private life, home, and the confidentiality of their communications. In the absence of adequate procedural safeguards and a proper justification for the necessity of such measures in each individual case, these circumstances may amount to a violation of Article 8 of the ECHR and require assessment by the ECtHR as to whether the interference satisfied the requirements of lawfulness, necessity, and proportionality.

Article 18 of the ECHR – Limitation on the use of restrictions on rights

"*The restrictions permitted under this Convention to the said rights and freedoms shall not be applied for any purpose other than those for which they have been prescribed*".

Article 18 of the ECHR occupies a distinctive place within the Convention system of human rights protection, as it is intended to prevent the abuse of power by the State. Its principal function is to ensure that restrictions on Convention rights which are formally lawful are not applied for hidden or improper purposes. Unlike most other provisions of the ECHR, Article 18 operates in conjunction with other substantive rights, including Articles 5, 6, and 8. In such cases, the ECtHR examines not only whether the right in question has been restricted, but also whether the restriction pursued a purpose other than that permitted under the ECHR.

In the ECtHR's case law, Article 18 is regarded as a safeguard against politically or institutionally motivated persecution, where criminal proceedings are used as a means of exerting pressure on particular individuals or groups. The Court has emphasised that the purpose of Article 18 is to prevent situations in which the State employs legal mechanisms to pursue objectives that are incompatible with the principle of the rule of law.

In its Grand Chamber judgment in Merabishvili v. Georgia[446], the ECtHR established the leading standard for the application of Article 18. The Court held that, in order to find a violation, it must be shown that the ulterior purpose was the predominant purpose or, at the very least, a substantial one. That assessment is made on the basis of the overall circumstances of the case, including:

- the political or institutional context of the events;
- the consistency and coordination of the actions of the State authorities;
- the disproportionality of the measures employed;
- the selective nature of the criminal prosecution;
- public statements made by public officials;
- the existence of a chilling effect on others.

The ECtHR adopted a similar approach in Lutsenko v. Ukraine[447] and Kavala v. Turkey[448], where it found that, although the criminal procedural measures had formally been applied in accordance with lawful

445 "Leak of Vitaliy Shabunin's Private Photos: The SBI Will Review the Conduct of Officers Who Had Access to His Phone", ZMINA, 17 December 2025: https://zmina.info/news/zlyv-pryvatnyh-foto-shabunina-dbr-pereviryt-praczivnykiv-yaki-maly-dostup-do-jogo-telefonu/

446 Case of Merabishvili v. Georgia, Application no. 72508/13, Judgment (Grand Chamber, ECtHR), 28 November 2017: https://hudoc.echr.coe.int/eng?i=001-178753

447 Case of Lutsenko v. Ukraine, Application no. 6492/11, Judgment (ECtHR), 3 July 2012: https://hudoc.echr.coe.int/eng?i=001-192469

448 Case of Kavala v. Turkey, Application no. 28749/18, Judgment (ECtHR), 10 December 2019: https://hudoc.echr.coe.int/eng?i=001-199515

procedures, they pursued purposes other than those for which restrictions on rights are permitted under the ECHR, including influencing the applicants' public and professional activities or discouraging their continued engagement in such activities.

In the light of these standards, the coordinated timing of the large-scale searches targeting employees of an anti-corruption institution, their scale, coercive nature, and the broader context in which they were carried out require assessment from the perspective of whether procedural powers may have been used not only to pursue the legitimate aims of the criminal proceedings but also to influence the activities of the institution concerned. This is relevant to determining whether those actions were compatible with the requirements of Article 18 of the ECHR.

In the context of the events of July 2025, the scale and coordinated timing of the investigative actions are particularly significant. On 11 July 2025, three searches were carried out in relation to **Vitaliy Shabunin**, while on 21 July 2025 at least 37 searches were conducted simultaneously at the homes or premises of NABU detectives and persons associated with them. The searches were carried out concurrently by armed law enforcement officers and were accompanied by the seizure of data storage devices used by NABU detectives in the course of investigating high-profile criminal proceedings. The seizure of precisely these materials suggests that the investigative actions were directed not only towards achieving the objectives of the relevant criminal proceedings but also towards obtaining access to information relating to the detectives' professional activities in the field of anti-corruption investigations.

The coordinated timing and scale of these actions indicate that the operation was centrally coordinated, which is one of the factors taken into account by the ECtHR when assessing a possible violation of Article 18 of the ECHR. In determining whether restrictions on rights pursued an ulterior purpose, the ECtHR also attaches considerable importance to the chronological sequence of events. In the present case, the investigative actions targeting NABU employees took place after the intensification of anti-corruption investigations involving senior public officials.

Prior to the events of July 2025, NABU had served a notice of suspicion on Oleksii Chernyshov, former Deputy Prime Minister, conducted searches involving former Deputy Head of the Office of the President Rostyslav Shurma, and carried out procedural actions concerning Tymur Mindich, who is closely associated with the Office of the President. In Lutsenko v. Ukraine and Kavala v. Turkey, the ECtHR emphasised that the sequence and context of procedural actions taken by State authorities may constitute important indicators of an ulterior purpose behind the application of restrictive measures, distinct from the purpose formally relied upon in the criminal proceedings. This is relevant to assessing whether such actions complied with the requirements of Article 18 of the ECHR.

Another factor taken into account by the ECtHR when assessing whether proceedings pursued an ulterior purpose is the public statements made by State officials and the manner in which criminal proceedings are presented in the public domain. During the events of 2025, public statements and media reports alleged that certain NABU detectives were involved in serious criminal offences, including "high treason". Such allegations were made, in particular, in connection with the searches involving detective **Ruslan Mahamedrasulov**, his father **Sentiabr Mahomedrasulov**, and **Viktor Husarov**. In addition, public allegations suggesting that **Ruslan Mahamedrasulov** and **Sentiabr Mahomedrasulov** may have been involved in other criminal offences were disseminated before any judicial determination had been made[449].

Such public statements, which may create the impression that the individuals' guilt had already been established before the conclusion of judicial proceedings, raise questions as to compliance with the presumption of innocence guaranteed by Article 6 § 2 of the ECHR. They are also taken into account by the ECtHR when assessing whether criminal proceedings may have been used for an ulterior purpose within the meaning of Article 18 of the ECHR. In Lutsenko v. Ukraine[450], the ECtHR emphasised that public statements made by State officials may be indicative of a political motivation underlying criminal prosecution.

449 This refers, in particular, to the joint briefing by Vasyl Maliuk, Head of the SSU, and Ruslan Kravchenko, Prosecutor General, held the day after the mass searches of NABU employees. "Searches at NABU! The Law No. 12414 Scandal! Maliuk and Kravchenko Answer Questions! Full Version", TSN YouTube channel, 22 July 2025: https://youtu.be/xHvAeQZEUb4?si=sMvUWrdcyh6CyYjD

450 Case of Lutsenko v. Ukraine, Application no. 6492/11, Judgment (ECtHR), 3 July 2012: https://hudoc.echr.coe.int/eng?i=001-192469

Assessing the existence of a possible ulterior purpose also requires consideration of the broader institutional context. On 19 June 2025, a parliamentary Temporary Investigative Commission (TIC) was established to examine the activities of NABU and the SAPO. In addition, in 2025, Law No. 12414 was adopted, providing for NABU and the SAPO to be placed under the authority of the Prosecutor General. Taken together, these developments – including the criminal proceedings, parliamentary initiatives, and legislative amendments – form a broader institutional context which the ECtHR has recognised as relevant when assessing whether there has been an abuse of power.

An analysis of the documented accounts provided by NABU detectives and of the broader context of the events of 2025 in the light of the standards established under the ECHR permits several conclusions to be drawn.

First, the three searches conducted in relation to **Vitaliy Shabunin** on 11 July 2025, together with the simultaneous conduct of at least 37 searches targeting **NABU employees and persons associated with them** on 21 July 2025, the detention of some of those individuals, and the imposition of stringent preventive measures indicate that the investigative actions formed part of a coordinated operation.

Secondly, these events occurred during a period of intensified anti-corruption investigations involving senior public officials, which constitutes a relevant factor when assessing the possible motives underlying the interference.

Thirdly, the public presentation of the criminal proceedings, the use of language referring to serious criminal offences before any judicial determination had been made, and the imposition of substantial bail amounts may have produced both reputational damage and a chilling effect, affecting not only the individuals concerned but also the institution as a whole.

Fourthly, the procedural actions in question took place within a broader institutional context that included parliamentary initiatives and legislative changes affecting the status of the anti-corruption institutions.

Applying the approach developed by the ECtHR in Merabishvili v. Georgia[451], the cumulative effect of the factors outlined above may indicate that the restrictions on rights – including the use of physical force and treatment falling within Article 3 of the ECHR, deprivation of liberty under Article 5, interference with private life under Article 8, and procedural restrictions in the criminal proceedings under Article 6 – were imposed not only for the purposes of the criminal investigation but also in pursuit of other objectives. Accordingly, the documented circumstances provide grounds for concluding that there may have been a violation of Article 18 of the ECHR, taken together with Articles 3, 5, 6, and 8, insofar as the restrictions on rights may have been used for purposes incompatible with the principles of the ECHR and the rule of law.

An analysis of the documented circumstances surrounding the events of July–December 2025, viewed in the light of the standards established under the ECHR, reveals a combination of factors that may indicate a risk that certain actions of the State authorities were incompatible with the guarantees enshrined in Articles 3, 5, 6, and 8 of the ECHR. The documented instances of the use of physical force during investigative actions, the prolonged detention of individuals without adequate individualised justification of the suspicion and the relevant risks, restrictions on access to effective legal assistance at the early stages of the proceedings, and the conduct of searches involving the seizure of substantial volumes of digital material without sufficient specification of its procedural relevance all require assessment against the requirements of lawfulness, necessity, and proportionality.

At the same time, an analysis of the case materials relating to individual NABU detectives and persons associated with them reveals circumstances that may call into question the sufficiency of the factual basis for certain restrictive measures, the timeliness of informing the individuals concerned of the nature of the suspicion against them, and the effectiveness of judicial oversight of the preventive measures imposed. Taken together, these circumstances are relevant to assessing whether the actions of the State authorities complied with the standards protecting against arbitrary deprivation of liberty and the guarantees of a fair trial within the meaning of Articles 5 and 6 of the ECHR.

451 Case of Merabishvili v. Georgia, Application no. 72508/13, Judgment (Grand Chamber, ECtHR), 28 November 2017: https://hudoc.echr.coe.int/eng?i=001-178753

Of particular significance are the coordinated large-scale searches conducted against employees of the anti-corruption institution, their extensive scope, coercive nature, and the seizure of materials relating to their professional activities in the field of anti-corruption investigations. Taken together with the public presentation of the criminal proceedings, legislative initiatives aimed at altering the institutional status of the anti-corruption bodies, and the chronological sequence of the procedural actions, these factors form a broader context which, according to the ECtHR's approach, may be taken into account when assessing whether procedural powers were used for purposes other than those of the criminal proceedings.

In the light of the standards established by the ECtHR, the cumulative effect of the established circumstances may indicate that the restrictions on rights were imposed not only for the procedural purposes of the criminal investigation but also within a broader institutional context, thereby warranting an assessment of these events under Article 18 of the ECHR, taken together with Articles 3, 5, 6, and 8 of the ECHR.

Accordingly, the documented facts may provide a basis for a further legal assessment of whether the actions of the State authorities complied with the standards established under the ECHR, both at the national level and in the context of potential international legal proceedings. They may also indicate the existence of broader systemic risks affecting the guarantees of the independence of anti-corruption activities and the observance of the rule of law.

Given that the ECHR forms part of Ukraine's national legal system and that the case law of the ECtHR is applied by domestic courts as a source of law, the circumstances identified in this chapter, which may indicate non-compliance with the standards established under the ECHR, are relevant both to the domestic legal assessment of the actions of the State authorities and to their potential consequences under international law.

CONCLUSIONS

This study compared the actual actions taken by law enforcement authorities in the criminal prosecution of anti-corruption actors with the procedural guarantees provided under national law and the standards established under the ECHR, and analysed their cumulative impact on Ukraine's anti-corruption system. On the basis of that analysis, the following conclusions have been drawn regarding the nature of the prosecution of anti-corruption actors, the level of compliance with human rights standards, and the systemic risks posed to the rule of law.

1. The nature of the persecution: from individual cases to a systemic practice

An analysis of the 29 documented cases demonstrates that the persecution of anti-corruption actors through the use of criminal procedural mechanisms cannot be regarded as a series of isolated or coincidental incidents. The combination of factors – the concentration of events within a relatively short period, the targeting of individuals involved in investigating high-level corruption, the recurring procedural patterns, the inclusion of both professional colleagues and family members, and the synchronisation of investigative actions with political and information campaigns – indicates the emergence of a consistent pattern of pressure of a systemic nature. This practice extends beyond isolated instances of abuse of power by individual law enforcement officers and points to the use of criminal procedure as an instrument of pressure on anti-corruption activities.

2. Criminal procedure as an instrument of pressure rather than the protection of the law

The documented actions demonstrate a systemic shift in the function of criminal procedure – from facilitating the investigation of criminal offences to creating legal uncertainty and producing a chilling effect on anti-corruption actors. The widespread use of "urgent" searches without adequate grounds, reliance on serious offences under the CC of Ukraine in the absence of well-founded and individualised suspicions, the extensive seizure of electronic devices, interference with the private lives of family members, the disproportionate use of force and custodial preventive measures, and the formalistic nature of judicial oversight all indicate that procedural powers were transformed into an instrument of pressure. The principal conclusion is that criminal procedural mechanisms were systematically used not to ensure an effective pre-trial investigation but to constrain the institutions and individuals responsible for investigating high-level corruption.

3. Violations of national procedural standards are systemic rather than isolated

The identified violations of national procedural standards – including the requirements of well-founded and individualised suspicion, the admissibility, reliability, and relevance of evidence, the proportionality of interference with property rights, effective judicial oversight, and respect for human dignity – recur across a substantial proportion of the cases analysed. This provides grounds for treating the situation as a consistent practice in which the fundamental safeguards of criminal procedure have effectively ceased to perform their protective function. Such a practice is incompatible with the objectives of criminal proceedings and undermines confidence in the State's ability to ensure the fair administration of justice in the documented cases.

4. Violations of the ECHR extend beyond individual cases

The documented cases point to a systemic risk of violations of several provisions of the ECHR, most notably Articles 3, 5, 6, 8, and 18. They reveal a pattern in which restrictions on rights – including detention, searches, access to personal data, interference with private and family life, and information campaigns – were applied in a context suggesting objectives other than those formally declared, namely the deterrence of anti-corruption activities, the exertion of control over independent institutions, and the creation of a chilling effect on potential corruption whistleblowers. In this context, the cumulative effect of the established circumstances points to indications of political motivation behind these actions, as the interference targeted a sphere with a direct impact on the political system and was accompanied by consequences beneficial to political actors who were the subject of anti-corruption investigations. Accordingly, the issue lies not only in the possible unlawfulness of individual procedural decisions but also in their coordinated orientation, which provides grounds for assessing these practices as incompatible with the Convention in its systemic dimension.

5. Consequences for the anti-corruption system

The documented practices have a structural impact on the anti-corruption system. They weaken the institutional independence of NABU and the SAPO, create an environment in which employees of anti-corruption institutions, civil society activists, other anti-corruption actors, and their family members cannot rely on protection from abuses by the State, and encourage self-censorship.

At the same time, these effects have already manifested themselves in concrete operational consequences. The suspension of security clearances for certain detectives restricted their participation in proceedings involving covert investigative (search) actions and materials classified as restricted. The seizure of devices containing criminal case materials created risks of leaks of official and confidential information, including information concerning the progress of investigations, the evidentiary record, covert witnesses, and confidential informants. The disclosure of such information may undermine ongoing investigations and expose participants in the proceedings to additional risks, while prolonged lack of access to these materials complicates or prevents further progress in individual cases and requires considerable time to restore information from backup sources. Furthermore, according to the leadership of NABU and the SAPO, following the events of July 2025, some whistleblowers suspended their cooperation with the anti-corruption authorities due to concerns for their own safety and the confidentiality of their communications, requiring the Bureau to devote additional efforts to restoring their trust and resuming cooperation[452].

In the longer term, such practices may lead to the accumulation of systemic disruptions in the work of the anti-corruption institutions, including delays in investigations, the loss of evidence or of its procedural admissibility, a decline in the effectiveness of covert investigative (search) actions, and an overall reduction in the effectiveness of investigations into high-level corruption.

6. The vulnerability of checks and balances

The fact that systemic abuses of criminal procedure targeting anti-corruption actors were not accompanied by timely and effective judicial oversight or by an adequate response from the prosecution authorities demonstrates the vulnerability of the system of checks and balances. This includes the formal review of the merits of procedural applications, the approval of procedural decisions without a proper assessment of their necessity and proportionality, and the absence of an effective response to violations of individuals' rights. In the documented cases, this was reflected in the use of "urgent" searches without adequate grounds, investigative actions directed against relatives and other persons lacking procedural status, the use of physical force during arrests, the imposition of pre-trial detention on insufficiently substantiated grounds, and the dissemination of personal data through the media. As a result, the problem assumes a systemic character and raises broader concerns regarding the effectiveness of the mechanisms for overseeing the activities of the law enforcement system.

7. The principal systemic threat

In summary, the findings of this study indicate that the principal threat lies in the gradual "normalisation" of the use of criminal procedural and administrative instruments to control the anti-corruption ecosystem through fear, uncertainty, and discrediting. Unless this practice is halted and reversed, it has the potential to transform anti-corruption institutions from mechanisms for combating corruption into merely formal components of the system, lacking genuine guarantees of independence. At the same time, the 2025 Rule of Law Roadmap identifies the strengthening of the institutional capacity and independence of anti-corruption bodies as one of the key conditions for advancing Ukraine's accession negotiations with the EU. Any practices aimed at exerting pressure on or controlling this institutional framework run counter to the logic of the Roadmap and call into question Ukraine's fulfilment of the EU's fundamental rule of law requirements. This, in turn, places at risk not only the effectiveness of anti-corruption policy but also the broader trajectory of democratic reform.

452 "Semen Kryvonos Explains How the SSU's Searches of NABU Employees Affected Their Investigations", Suspilne News, 1 August 2025: https://suspilne.media/1081119-direktor-nabu-rozpoviv-ak-obsuki-sbu-u-pracivnikiv-buro-vplinuli-na-ihni-rozsliduvanna/

ANNEXES

Table 1. Searches in cases involving anti-corruption actors and their family members

No.	Person	Position/role at the time of the investigative actions	Date of the search	Number of searches/locations	Approximate start time	Prior court authorisation	Conducting authority	Particular circumstances
1	Vitaliy Shabunin	Chair of AntAC	11 July 2025	3	14:00	No	SBI	Searches were conducted at his place of service and his registered address, as well as at the home of Juice's mother.
2	Dmytro Atamanchuk	Senior NABU detective	21 July 2025	2	8:00	No	SSU	Simultaneous searches were conducted at the homes of his relatives.
3	Viktor Husarov	NABU detective	21 July 2025	2	9:00	No	SSU	Searches of his vehicle and home; his vehicle was damaged during the searches.
4	Denys Hiulmahomedov	First Deputy Director of NABU	21 July 2025	1	5:45	No	SSU	
5	Oleksii Diadenko	Senior NABU detective	21 July 2025	1	5:30	No	SSU / SBI	
6	Ivan Kravchuk	Head of a NABU detective unit	21 July 2025	1	5:30	No	SSU	
7	Ruslan Mahamedrasulov	Head of a NABU detective unit	21 July 2025	4 + 1 at the homes of his mother and sisters	5:00	No	SSU	Searches were also conducted at the homes of family members; the exact number of searches is unknown.
8	Sentiabr Mahomedrasulov	Father of the Head of a NABU detective unit	21 July 2025	3	N/A	No	SSU	Searches were conducted at his home and at the premises of businesses with which he had cooperated.
9	Roman Niedov	Deputy Head of a NABU detective unit	21 July 2025	1*	5:40	No	SSU / SBI	Search conducted at his place of residence. A search was also carried out at his wife's apartment, which had been rented by NABU detective Mykhailo Cherviakov; see item 19.
10	Anton Oliinyk	Officer of the NABU Operational and Technical Department	21 July 2025	1	N/A	No	SBI	
11	Kostiantyn Polkin	Head of a NABU detective unit	21 July 2025	1	5:30	No	SSU / SBI	Electronic devices belonging to guests were seized.
12	Mykhailo Romaniuk	Head of a NABU detective unit	21 July 2025	3 + 2 in October pursuant to a court order	5:30	No (in July) / Yes (in October)	SSU / SBI	Additional searches were conducted in October 2025 at the homes of the detective's parents and wife pursuant to a court order.
13	Oleksandr Skomarov	Head of a NABU detective unit	21 July 2025	1	N/A	No	SSU	
14	Illia Statura	Deputy Head of a NABU detective unit	21 July 2025	3	5:15	No	SSU	Searches were conducted of his hotel room, vehicle, and home.

15	Vitalii Tiebiekin	Deputy Head of a NABU detective unit	21 July 2025	3	5:40	No	SSU / SBI	Searches were conducted at his home and at the homes of his relatives.
16	Yevhen Tokar	Head of a NABU detective unit	21 July 2025	1	6:45	No	SBI	The entrance door was forced open during the search.
17	Oleksandr Usov	NABU detective	21 July 2025	2	7:45	No	SSU	The search of his home was conducted in the detective's absence, with only his daughter present. At another address, from which the family had already moved out, the entrance door was forced open.
18	Yurii Tsvietkov	Senior NABU detective	21 July 2025	1	5:30	No	SSU	Before the search, he reported interference with his vehicle.
19	Mykhailo Cherviakov	Senior NABU detective	21 July 2025	1	5:30	No	SSU / SBI	See item 9.
20	Valentyn Shmitko	Head of a NABU detective unit	21 July 2025	3	6:00	No	SSU / SBI	Searches were also conducted at his brother's home.
21	Bohdan Brovko	Former NABU detective, Deputy Head of the Corporate Security Department at JSC Ukrzaliznytsia	25 September 2025	N/A	N/A	Yes	SSU	
22	Taras Likunov	Former NABU detective, Deputy Head of the Corporate Security Department at JSC Ukrzaliznytsia	25 September 2025	1	N/A	Yes	SSU	
23	Serhii Medetskyi	Former NABU detective, Deputy Head of the Corporate Security Department at JSC Ukrzaliznytsia	25 September 2025	N/A	N/A	Yes	SSU	
24	Oleksandr Rykovtsev	Former NABU detective, Head of the Corporate Security Department at JSC Ukrzaliznytsia	25 September 2025	N/A	N/A	Yes	SSU	

Table 2. Seizure of electronic devices during searches of anti-corruption actors and their family members

No.	Person	Position/role at the time of the investigative actions	Electronic devices seized from anti-corruption actors or persons associated with them	Were family members' electronic devices seized? If so, which devices?	Other items seized	Particular circumstances
1	Vitaliy Shabunin	Chair of AntAC	Mobile phone, laptop	Yes – his wife's electronic devices, and the minor children's mobile phone and tablets	—	Private photographs from his mobile phone were subsequently made public.
2	Dmytro Atamanchuk	Senior NABU detective	Mobile phone	Yes – his wife's mobile phone	Four SIM cards	—
3	Viktor Husarov	NABU detective	Mobile phone, laptop	Yes – his wife's mobile phone	Cash savings	—
4	Denys Hiulmahomedov	First Deputy Director of NABU	Mobile phone, laptop	No	—	—

5	Oleksii Diadenko	Senior NABU detective	Two mobile phones, two laptops	Yes – the mobile phone of the woman with whom he lives	Two notebooks containing bank card passwords	—
6	Ivan Kravchuk	Head of a NABU detective unit	Mobile phone, two laptops	Yes – his wife's mobile phone	—	His wife's mobile phone contained information protected by legal professional privilege.
7	Ruslan Mahamedrasulov	Head of a NABU detective unit	Mobile phones, laptops, USB flash drives	Yes – his father's mobile phone	SIM cards; property placed under seizure, including a vehicle, firearms, and data storage devices	During the search, the mobile phone was broken by the anti-corruption actor.
8	Sentiabr Mahomedrasulov	Father of the Head of a NABU detective unit	Mobile phone	Yes – his son's electronic devices	Property	—
9	Roman Niedov	Deputy Head of a NABU detective unit	Mobile phone, laptop, smartwatch	Yes – his wife's mobile phone and smartwatch	Property and vehicle documents	His wife's mobile phone contained information protected by medical confidentiality.
10	Anton Oliinyk	Officer of the NABU Operational and Technical Department	Mobile phone	N/A	N/A	N/A
11	Kostiantyn Polkin	Head of a NABU detective unit	Mobile phone	Yes – two laptops, five mobile phones, and documents belonging to relatives who were visiting	A box containing NABU technical equipment, two SIM card trays, and two memory cards	The mobile phone of a nine-year-old child was seized.
12	Mykhailo Romaniuk	Head of a NABU detective unit	Mobile phone	Yes – his wife's mobile phone and laptop, and the mobile phones of his parents and mother-in-law	Cash savings, documents, and utility payment receipts	—
13	Oleksandr Skomarov	Head of a NABU detective unit	Mobile phone, iPad	Yes – his wife's mobile phone	Hard drive containing unofficial databases	—
14	Illia Statura	Deputy Head of a NABU detective unit	Mobile phone	Yes – his wife's mobile phone	NABU candidate integrity questionnaire – 18 pages	No inventory of the items seized from the apartment was available because no search record was left behind; however, two laptops and USB flash drives were found to be missing.
15	Vitalii Tiebiekin	Deputy Head of a NABU detective unit	Two mobile phones, two laptops	Yes – three mobile phones belonging to his wife, father-in-law, and mother-in-law	Six USB flash drives	—
16	Yevhen Tokar	Head of a NABU detective unit	Mobile phone, two hard drives, and a storage device	Yes – two laptops used by his wife and child	A storage device belonging to NABU and four USB flash drives	Data from his wife's mobile phone were copied.
17	Oleksandr Usov	NABU detective	Laptop	Yes – his daughter's mobile phone and his wife's tablet	—	—

18	Yurii Tsvietkov	Senior NABU detective	Mobile phone, laptop	No	—	—
19	Mykhailo Cherviakov	Senior NABU detective	Three mobile phones, a laptop, and a computer hard drive	No	Apartment lease agreements and utility payment receipts	—
20	Valentyn Shmitko	Head of a NABU detective unit	Mobile phone	No	Property documents	—
21	Bohdan Brovko	Former NABU detective, Deputy Head of the Corporate Security Department at JSC Ukrzaliznytsia	N/A	N/A	N/A	N/A
22	Taras Likunov	Former NABU detective, Deputy Head of the Corporate Security Department at JSC Ukrzaliznytsia	Two smartphones and a feature phone	No	USB flash drives	Documents relating to his previous employment were seized.
23	Serhii Medetskyi	Former NABU detective, Deputy Head of the Corporate Security Department at JSC Ukrzaliznytsia	N/A	N/A	N/A	N/A
24	Oleksandr Rykovtsev	Former NABU detective, Head of the Corporate Security Department at JSC Ukrzaliznytsia	N/A	N/A	N/A	N/A

Table 3. Use of physical force and other forms of coercion during searches of anti-corruption actors and their family members

No.	Person	Position/role at the time of the investigative actions	Details of the use of physical force against the individual
1	Viktor Husarov	NABU detective	Beaten during his arrest.
2	Oleksii Diadenko	Senior NABU detective	Beaten during the search.
3	Ivan Kravchuk	Head of a NABU detective unit	Beaten during the search; plastic cable ties were used as handcuffs.
4	Antonina Kravchuk	Wife of the Head of a NABU detective unit; lawyer	Physical force was used to obtain access to her mobile phone: an SSU officer grabbed her by the wrist, snatched the phone from her hands, and held it up to her face to unlock it.
5	Ruslan Mahamedrasulov	Head of a NABU detective unit	Beaten during the search and handcuffed.
6	Roman Niedov	Deputy Head of a NABU detective unit	Forced to the floor, held at gunpoint with an automatic firearm, kept in that position for a prolonged period, and threatened with physical violence.
7	Yurii Tsvietkov	Senior NABU detective	Beaten before the searches. One SSU officer threatened that if he refused to disclose his access code, he would be taken to the SIZO and would allegedly have an "accident" on the way, preventing him from ever arriving there.
8	A NABU employee who spoke on condition of anonymity	A NABU employee who spoke on condition of anonymity	Pinned against a wall, with his arms forced behind his back during the search, and threatened with damage to his property after refusing to provide access to his mobile phone.
9	A NABU employee who spoke on condition of anonymity	A NABU employee who spoke on condition of anonymity	Beaten during the search.

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