



**GLOBAL  
INITIATIVE**

AGAINST TRANSNATIONAL  
ORGANIZED CRIME

# NEW FRONT LINES

**Organized criminal economies  
in Ukraine in 2022**

FEBRUARY 2023







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February 2023

## ACKNOWLEDGEMENTS

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Cartography: Rudi de Lange

Please direct inquiries to:  
The Global Initiative Against Transnational Organized Crime  
Avenue de France 23  
Geneva, CH-1202  
Switzerland

[www.globalinitiative.net](http://www.globalinitiative.net)



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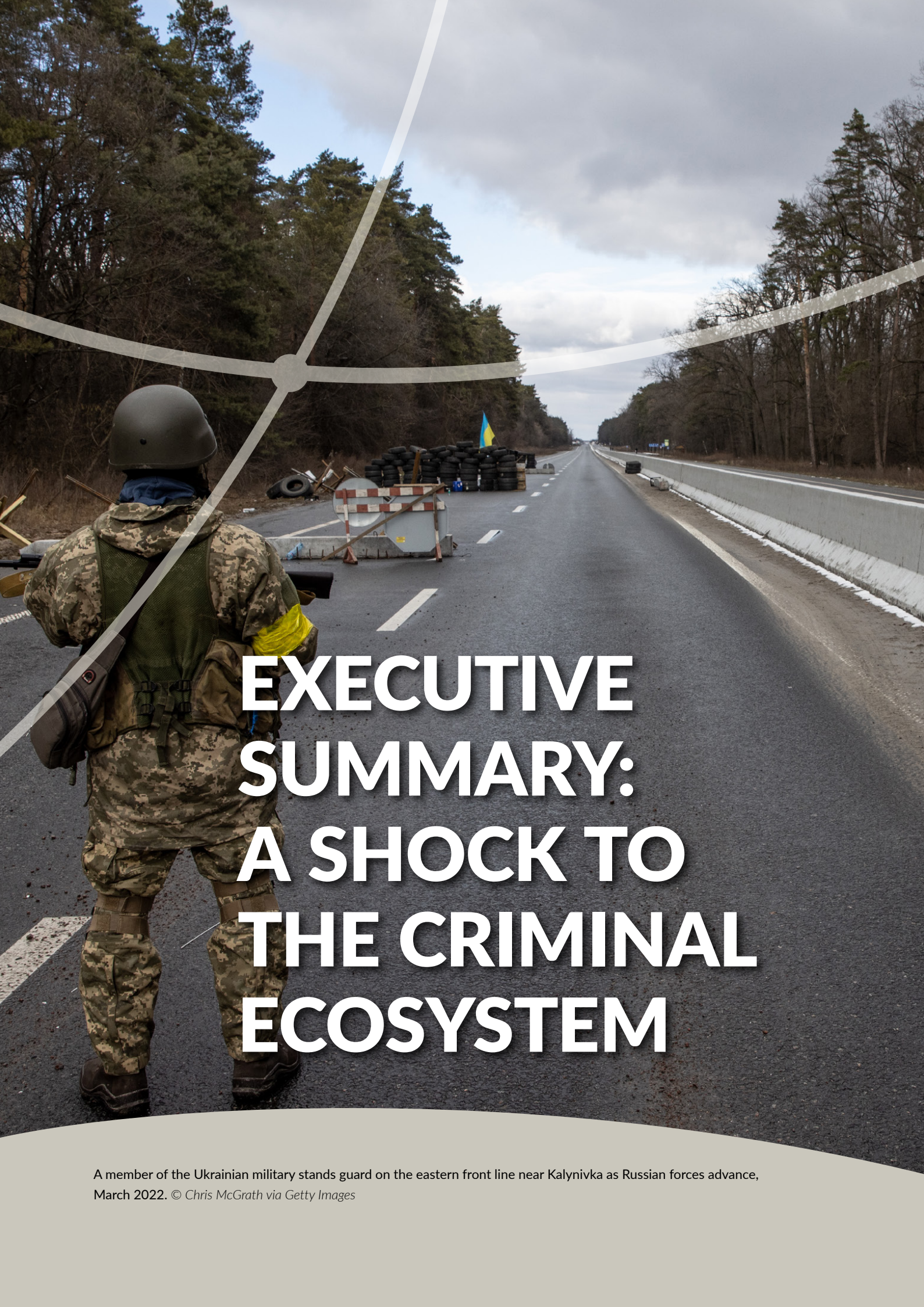
# ACRONYMS AND ABBREVIATIONS

|               |  |
|---------------|--|
| <b>GI-TOC</b> | Global Initiative Against Transnational Organized Crime            |
| <b>IDP</b>    | Internally displaced person  |
| <b>IMF</b>    | International Monetary Fund  |
| <b>LDNR</b>   | People's Republics of Luhansk and Donetsk                          |
| <b>NABU</b>   | National Anti-Corruption Bureau (Ukraine)                          |
| <b>NAZK</b>   | National Agency on Corruption Prevention (Ukraine)                 |
| <b>OCHA</b>   | United Nations Office for the Coordination of Humanitarian Affairs |
| <b>PMC</b>    | Private military company   |
| <b>SAPO</b>   | Specialized Anti-Corruption Prosecutor's Office (Ukraine)          |
| <b>SBU</b>    | Security Service of Ukraine  |
| <b>TPD</b>    | Temporary Protection Directive                                     |



Abandoned munitions crates, Kharkiv region, September 2022. © Juan Barreto/AFP via Getty Images






# EXECUTIVE SUMMARY: A SHOCK TO THE CRIMINAL ECOSYSTEM

A member of the Ukrainian military stands guard on the eastern front line near Kalynivka as Russian forces advance, March 2022. © Chris McGrath via Getty Images





**B**efore February 2022, Russian and Ukrainian organized crime formed the strongest criminal ecosystem in Europe.<sup>1</sup> Having developed along similar lines in the 1990s, Russian and Ukrainian criminal groups and networks controlled a lucrative transnational smuggling highway between Russia and Western Europe that carried gold, timber, tobacco, coal, counterfeit/untaxed goods, humans and drugs. At the more politically connected end of the spectrum, corrupt officials and criminal bosses from both countries exploited Ukraine's role as a transit country for Russian gas to siphon off millions of dollars, while Ukraine's oligarch class exerted a strong grip over the country's economic, political and information spheres.

Kyiv made serious efforts to tackle organized crime and corruption after the 2014 Maidan Revolution but results were mixed, especially in the case of judicial reform; meanwhile, the conflict in the Donbas region helped bolster an array of illicit economies and criminal actors. For organized crime, business was generally good.

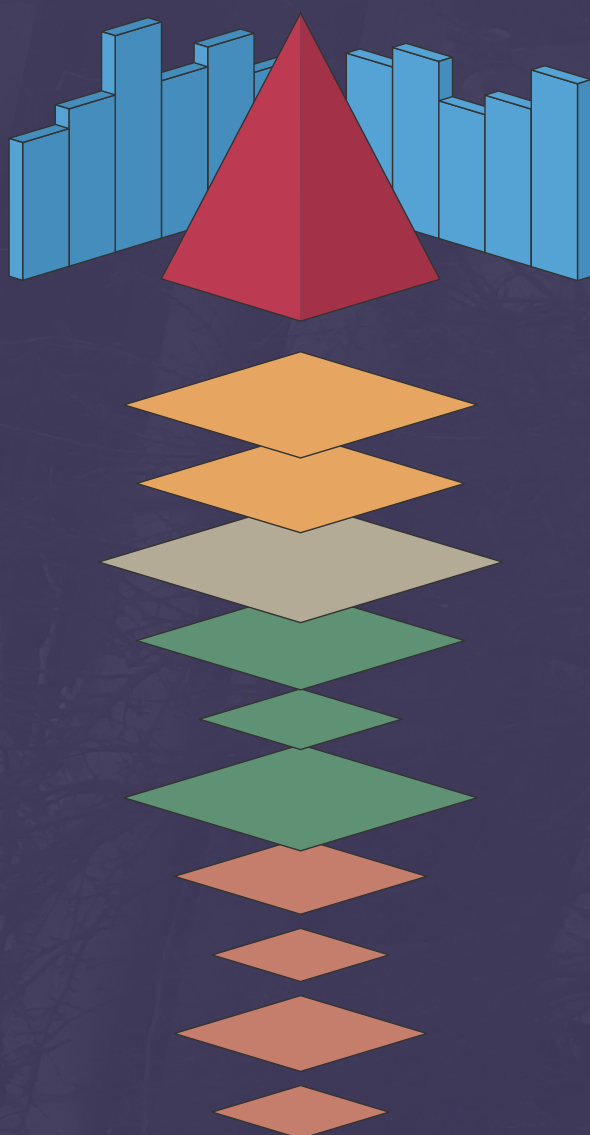
The Russian invasion has inflicted a profound shock to this ecosystem. With the war, collaboration between Russian and Ukrainian organized crime interests became impossible due to the political situation (which led many criminals to break such ties) and the pragmatic challenge of smuggling across what was now a violently contested and dynamic front line.<sup>2</sup> Many Ukrainian crime bosses chose to leave the country, as did many oligarchs, including several accused of pro-Russian sympathies. Martial law and the curfew also initially constrained criminal activity. According to senior sources in the Ukrainian police, incidents of armed robberies declined by a factor of between three and four, and the homicide rate dropped to almost zero at the beginning of the war (although this may partly reflect the impact of the war on reporting in the early days of the war).<sup>3</sup> It may be that the impact of the invasion also whittled out some less robust and resilient organized crime groups: according to data from the general prosecutor's office, the number of organized crime groups under investigation decreased from 499 in 2021 to 395 in 2022 (although this decline alternatively could reflect diminished investigative capacity).<sup>4</sup>

## ORGANIZED CRIME IN UKRAINE BEFORE THE INVASION

In 2021, the GI-TOC published its assessment of organized crime in Ukraine as part of the Global Organized Crime Index. The results – listed below – provide a snapshot of the criminal landscape in Ukraine before the Russian invasion in February 2022. While many of these aspects

may change as a result of the invasion, the existence of established illicit markets in several conflict-related areas (arms and human trafficking) and the influence of corrupt officials provide a picture of the underlying vulnerabilities and risks that the conflict may fuel.

### HIGH CRIMINALITY, LOW RESILIENCE



SOURCE: Global Initiative Against Transnational Organized Crime, Global Organized Crime Index 2021.



### 6.18 CRIMINALITY SCORE

34<sup>th</sup> of 193 countries

3<sup>rd</sup> of 44 European countries

3<sup>rd</sup> of 17 Central & Eastern European countries



#### CRIMINAL MARKETS 5.60

|                               |      |
|-------------------------------|------|
| HUMAN TRAFFICKING             | 7.00 |
| HUMAN SMUGGLING               | 6.50 |
| ARMS TRAFFICKING              | 8.00 |
| FLORA CRIMES                  | 6.50 |
| FAUNA CRIMES                  | 4.00 |
| NON-RENEWABLE RESOURCE CRIMES | 7.00 |
| HEROIN TRADE                  | 5.00 |
| COCAINE TRADE                 | 3.50 |
| CANNABIS TRADE                | 5.00 |
| SYNTHETIC DRUG TRADE          | 3.50 |



#### CRIMINAL ACTORS 6.75

|                       |      |
|-----------------------|------|
| MAFIA-STYLE GROUPS    | 6.00 |
| CRIMINAL NETWORKS     | 7.00 |
| STATE-EMBEDDED ACTORS | 8.00 |
| FOREIGN ACTORS        | 6.00 |




### 4.00 RESILIENCE SCORE

133<sup>rd</sup> of 193 countries

41<sup>st</sup> of 44 European countries

14<sup>th</sup> of 17 Central & Eastern European countries



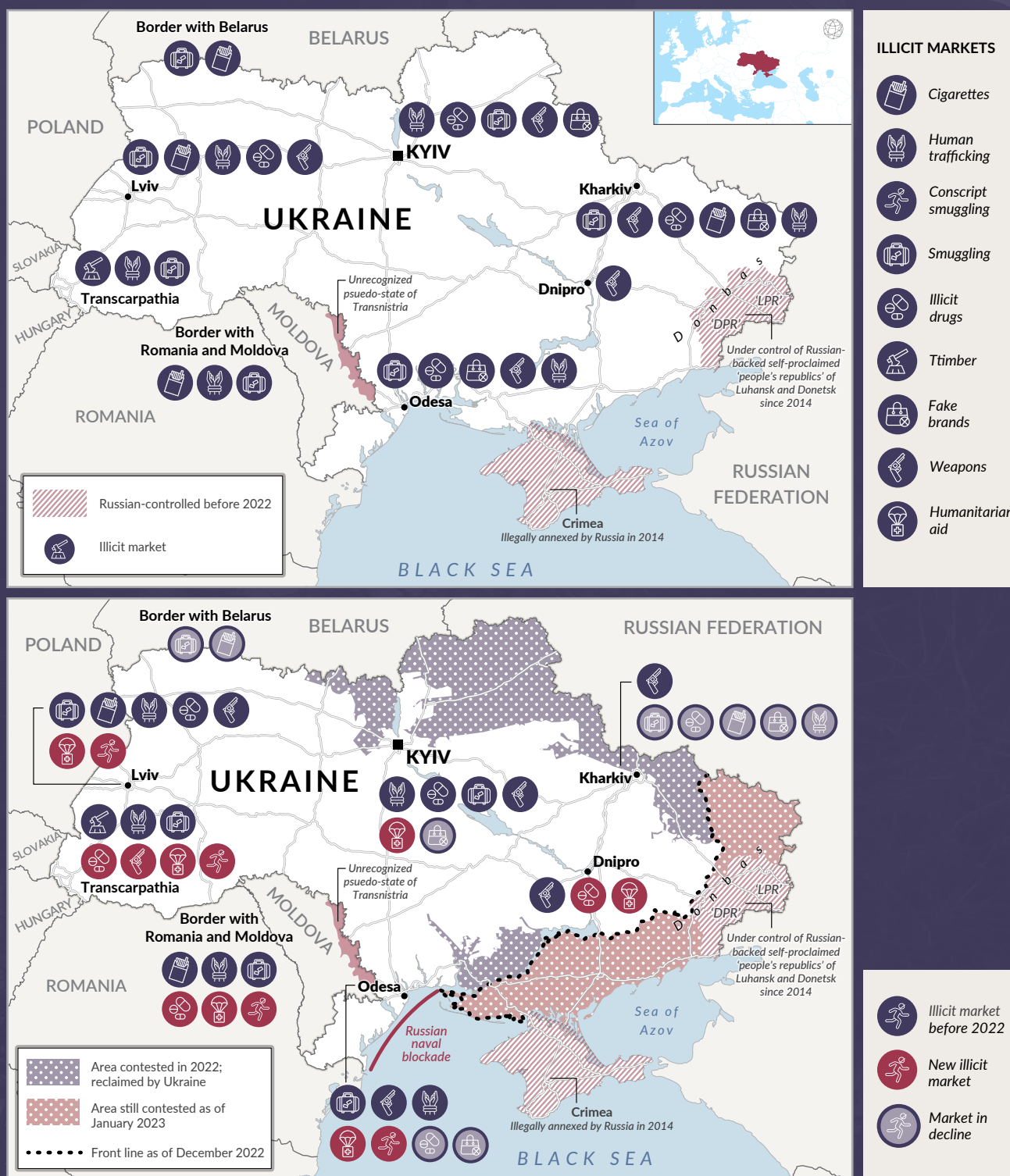


But after this initial period of disruption, many forms of organized crime resumed – and there is evidence that conflict is bringing new opportunities. While illicit flows from the east of Ukraine and through Odesa may have diminished, smuggling of various kinds has boomed in the west. Synthetic drugs continue to be produced and distributed across the country, including to the front line, where they feed into a burgeoning grey zone economy of drugs and informal arms collection and trading.

There have been glimmers of good news, in that the two largest conflict-created vulnerabilities – the massive influx of weapons and the exodus of millions of refugees – do not appear to have been exploited by organized crime to the extent initially feared. Controls over Western weapons and the unprecedented reception of Ukrainian refugees in Europe may have helped contain these vulnerabilities in the short term. However, it is likely that criminality is building in the shadows, with the augmentation of domestic illicit stockpiles from various sources and exploitation of vulnerable people remaining hidden from view.

The state's efforts to tackle organized crime and corruption have been also affected by the war. Although investigations, arrests and prosecutions have continued, attention has necessarily been diverted to the war effort: law enforcement personnel have been called up for military service, detectives put on intelligence-gathering duties and public access to databases of sensitive state information has been restricted (albeit in most cases temporarily). This will provide organized crime with another type of opportunity: that of less scrutiny and pressure, which may enable criminal activities to expand.

This report explores the changing dynamics in the political economy of Ukrainian organized crime up till December 2022 and maps how the criminal landscape has adapted to the new situation. Given the complexity of the impact of the war in Ukraine on organized crime in both parties to the conflict, the GI-TOC is producing two reports. This report concentrates on developments within Ukraine's internationally recognized borders – with the exception of the so-called Luhansk and Donetsk 'people's republics' (LDNR) in the Donbas region, which broke away from Kyiv in 2014 with Russian backing and assistance, and Crimea, which Russia illegally annexed the same year. The impact of the conflict on organized crime in these areas and on Russian organized crime more generally will be discussed in a separate report, which will assess trends in sanctions busting and money laundering, changes in trafficking flows east of Ukraine and how Russian organized crime groups have responded to the conflict.



**FIGURE 1** Organized crime in Ukraine before the February 2022 Russian invasion (top) and after (below).



Although the trajectory and outcome of the conflict remain uncertain, past evidence indicates that planning for the post-conflict period cannot wait for peace to come – and that includes analyzing and countering the risk of organized crime. While the battles on the ground and in the political and economic space are understandably dominating attention, there is a broad body of research that points to the long-term risks of putting aside considerations of the illicit economy in a time of conflict. Indeed, Ukraine is a case study of such risks, as highlighted by the GI-TOC's 2022 assessment of the evolution of organized crime in the self-proclaimed people's republics of Luhansk and Donetsk (LDNR).<sup>5</sup>

But as well as considering other cases of the crime–conflict nexus (which are largely based on the conduct of criminal actors in civil wars), awareness must be cultivated of new dynamics that are likely to emerge from the specific aspects of this conflict. In this regard, two features stand out as distinctive. The first is that the Russia–Ukraine war is arguably the first since the rise of transnational organized crime in the 1990s that features such a powerful and sophisticated organized crime ecosystem. Although the conflict in Afghanistan occurred in a criminal context of substantial illicit flows of commodities and powerful local

actors, the Russia–Ukraine ecosystem stands out in that it involves globally influential political elites and permeates the international financial system, through which gangs from Ukraine may reportedly amass multi-million-pound London property portfolios.<sup>6</sup> The second is that this is the first war being waged not only on the battlefield, but also in the sinews of globalization. As a result, organized crime may be evolving in ways that may not only revolutionize how illicit markets function, but also feed into an emerging multipolar global order in which organized crime becomes a major geopolitical player.

It is therefore critical to assess the potential future risks posed by organized crime and prepare a suite of responses that can disrupt its momentum and reduce its propensity to escalate at the national and international levels. Although evidence is still patchy, there are signs that the criminal landscape is in flux – and history has shown that criminals generally emerge stronger from times of crisis. As Ukraine fights for its existence as a nation, it must also ensure that it defends itself from those who would corrode and usurp its statehood from within. The world, too, must be prepared for the changing dynamics of organized crime that will emerge from the conflict.

## Methodology

The Global Initiative Against Transnational Organized Crime (GI-TOC) established the Observatory of Illicit Markets and the Ukraine Conflict with a fourfold remit:

1. To monitor and analyze developments in organized crime and illicit markets, as well as their impact.
2. Provide early warning on changing trends and patterns in illicit markets, economies and organized crime.
3. Identify and analyze broader global networks related to sanctions avoidance and the funding of the war.
4. Provide support for more resilient community-centred and state responses to the threat of organized crime.

To this end, a network of researchers and fieldworkers was established in Ukraine to monitor events on a daily basis. This knowledge base has been supplemented by fieldwork conducted in March 2022, April–May 2022, October 2022 and December 2022 in cities and regions across Ukraine, including on the front line. Alongside first-hand monitoring, interviews were also conducted with law enforcement

officials, journalists, politicians, and local and international NGOs. Ukrainian underworld sources were also interviewed in a number of places in Europe.

This report is based on the research and analysis of the Observatory over the course of 2022, along with a desk review of open-source information published in Ukrainian, Russian and English. Given the high degree of online misinformation and outright disinformation – especially in regard to the politically sensitive subjects of arms trafficking and the misappropriation of humanitarian aid<sup>7</sup> – every effort was taken to corroborate assertions, but the circumstances of war make certainty impossible, particularly in regard to the evolution of organized crime, whose covert nature makes it difficult to independently verify even in peacetime. As such, this report highlights the perceived shifts in the underworld in Ukraine, the nature and extent of which can be further tested and corroborated when more information becomes available.



A photograph of several Ukrainian military tanks, including a T-72 and a T-84, loaded onto flatbed railcars. The tanks are olive green and equipped with various armor and sensors. They are positioned on a set of railway tracks with overhead power lines and pylons visible in the background under a clear blue sky. A semi-transparent white graphic element, consisting of several intersecting lines, is overlaid on the image.

# CONTEXT: THE EVOLUTION OF UKRAINIAN ORGANIZED CRIME

Ukrainian tanks set to leave Crimea following the illegal 2014 Russian annexation of the peninsula.

© Olga Maltseva/AFP via Getty Images



Ukraine's organized crime landscape has developed significantly since 1991, the year the country became independent from the Soviet Union. As in other post-Soviet states, the turbulent transition to a free market economy catalyzed the growth of organized crime and saw the establishment of close ties between criminal groups (initially dominated by mafia-style actors), corrupt state actors and businesspeople – a triad of interests often encapsulated in the figure of the oligarch.<sup>8</sup> Drugs, human trafficking and weapons trafficking emerged as core illicit markets with domestic and transnational dimensions. Corruption reached endemic proportions, as did corporate raiding<sup>9</sup> and money laundering (the latter causing Ukraine to be placed on the Financial Action Task Force's blacklist in September 2001).<sup>10</sup>

What might be considered the second act in the evolution of Ukrainian organized crime came with the emergence of Viktor Yanukovich, prime minister during the administration of Leonid Kuchma and leader of the pro-Russian Party of Regions. Although his rise to power was initially stymied by the 2004 Orange Revolution, Yanukovich won the 2010 presidential election and under his administration corruption became even more of a problem, with the chief prosecutor of Ukraine later accusing Yanukovich of having run a multi-billion-dollar criminal syndicate. The former president denied these allegations on several occasions.<sup>11</sup>

Yanukovich was ousted in the 2014 Maidan Revolution after reneging on plans to sign the Association Agreement between Ukraine and the EU in favour of pursuing closer ties with Russia. The Maidan Revolution marked the beginning of a civil-society-led fightback against corruption, although official responses were less efficacious and reform momentum under President



**Viktor Yanukovich, former president of Ukraine and a Moscow ally, was accused of heading a criminal syndicate. He was ousted following the Maidan Revolution.**

© Paul J Richards/AFP via Getty Images

Petro Poroshenko quickly waned, as it had under President Viktor Yushchenko after the Orange Revolution. The Maidan Revolution also triggered a profound transformation in the organized crime landscape, after Moscow, indignant at the loss of its ally Yanukovich, instrumentalized criminal actors in Crimea and areas of the Donbas to assert direct or indirect control over parts of Ukraine.

Ukraine's illicit markets also appeared to go from strength to strength. Arms trafficking increased, while drug trafficking diversified to include the new phenomenon of domestically produced synthetic drugs. Illegally produced amber, destined primarily for China,<sup>12</sup> and timber to the EU<sup>13</sup> became lucrative earners – with steep environmental costs. Human traffickers continued to exploit both domestic and foreign victims for sex trafficking and forced labour in Ukraine as well as in Russia, Europe and the Middle East, with the almost 2 million people displaced by Russian aggression in 2014 creating a new reservoir of vulnerability.<sup>14</sup> President Vladimir Zelensky's landslide election victory in 2019 saw further concerted efforts against the march of organized crime, although serious challenges remained.

## Post-Soviet land of opportunity

Ukraine's transition from a centralized Soviet state to a market-based economy in the 1990s brought lucrative opportunities for criminal self-enrichment. Many of the independent nation's officials were holdovers from the Soviet system who were less interested in Western-style reform than personal gain, while at the other end of the social spectrum high levels of unemployment fuelled a shadow economy that had already enriched many criminal actors in the late 1980s.<sup>15</sup> Economic and financial crime also increased in the shape of tax evasion, customs fraud and the illegal facilitation of capital flight.<sup>16</sup> Large Soviet military stockpiles left in the country also provided a ready source for arms traffickers.

High-level corruption arguably became the main impediment to the country's economic growth. Ukraine's oligarchs became a byword for large-scale appropriation, corruption and political influence. Many oligarchs were closely affiliated with Russia, such as Dmitry Firtash, who, according to media reports, made his fortune in Russian gas by using his close connections with President Vladimir Putin's circle. (He is reported to have returned the favour by backing pro-Russian Yanukovich's successful 2010 presidential campaign, in the process helping Putin to secure an ally in Kyiv.<sup>17</sup>) The effects of rampant corruption and political mismanagement in Ukraine's early independence years were devastating, torpedoing productivity and scaring off foreign investment. The country suffered hyperinflation, a prolonged and steep economic contraction between 1991 and 1996, and a collapse in GDP by almost 50% from 1991 to 1994.<sup>18</sup>

Sensing opportunity, organized crime groups began to muscle in on the chaotic economy. The late 1980s had seen many powerful criminals gangs, often formed of athletes and martial artists, emerge in Ukraine, setting up protection rackets targeting markets, hotels, restaurants and casinos, and controlling prostitution, drugs, illegal gambling dens and the sale of cars – and these gangs ramped up operations in the 1990s, driving inter-gang warfare.<sup>19</sup> However, the turbulent nature of the post-Soviet period also accelerated the decline of 'thieves in law' or 'thieves under the code' (*vory v zakone* in Russian; *zlodiyi v zakoni* in Ukrainian) in Ukraine (see below: 'The rise and fall of the vory').

Alongside illicit activities, there were also licit avenues for criminals to pursue, although the line was often blurred. Lack of adequate legislation provided an opening for criminal





groups to become debt collectors and protectors of business, while businesses increasingly contracted criminal muscle to gain a competitive advantage, including through contract killings.<sup>20</sup> Assassinations were commonplace in the Ukrainian underworld from the late 1980s to the late 1990s, with Crimea and Donetsk the two most violent regions. In Crimea, organized crime extorted local business and increasingly moved into licit business, with little interference from Kyiv. Indeed, even before 2014, the peninsula was coming under the influence of Russia: according to one expert, drug trafficking and contraband/counterfeit cigarettes 'depended on relationships with the Russian criminal networks ... likewise the peninsula's dirty money was typically laundered through Russian banks and in the process became all but untraceable for the Ukrainian police'.<sup>21</sup> This geopolitical alignment of criminal actors would later provide Russia with sympathetic and amenable agents on the ground when it decided to move in response to the Maidan Revolution.

The Orange Revolution of 2004 promised a fightback against the seemingly inexorable march of corruption, with Yushchenko sweeping into power on an anti-corruption platform amid huge public support for reform. Little progress was made, however, with Yushchenko consumed by internal political battles and unable to tackle corruption and cronyism.<sup>22</sup> Under Yushchenko's successor, Yanukovych, corrupt elites (especially in Yanukovych's Donbas heartland)<sup>23</sup> grew ever more powerful.

But public discontent was mounting and mobilized into open opposition in 2014 after Yanukovych reversed a decision to orient the country's direction of travel away from Russia and towards the EU. What became known as the Maidan Revolution (named after a square in Kyiv) marked the end of an era for Ukrainian organized crime: before 2014, crime had plagued the country; after 2014, it would directly challenge the Ukrainian state itself.

**The signing of the Crimea annexation treaty, March 2014. Ethnic Russian organized crime actors in the peninsula have long been involved in various criminal economic activities.**

© A Nikolskiy/Kremlin press office/  
Anadolu Agency via Getty Images

## The rise and fall of the vory

The vory have long been a potent symbol of organized crime in the post-Soviet sphere. These mafia-style organizations, which have a strict code of honour and tattoo iconography, formed in Soviet penal camps and became influential between the 1960s and 1980s in Russia, Georgia and Ukraine, with Ukrainian vory often maintaining ties with their Russian counterparts. In the context of the Soviet Union's command economy, a tightly controlled, hierarchical model for organized crime was advantageous, but by the late 1980s this distinctive criminal subculture was already in decline. As Ukraine transitioned to a free-market economy in the 1990s, organized crime became the realm of the politically connected (or outright political) avtoritety (literally 'authorities'), whose only 'code' was that of money, while transnational networks and less hierarchical



The members of the vory bear characteristic tattoo iconography.

© Théo Paul Santana

gangs offered more agile criminal models. Some vory have adapted to these shifts; others have been left behind, though GI-TOC fieldwork reports that the vory still remain influential in Ukraine's prisons, where the old hierarchical rules still apply.

## Criminal geopolitics

Moscow perceived Yanukovych's ouster not as a domestic uprising against a corrupt leadership but as an illegal coup and sign of the increasing influence of the West in what it understood as its geopolitical backyard. It was evidently imperative to shore up Russian influence over Ukraine, but Moscow also desired a certain degree of deniability, however specious. It accordingly chose to leverage pro-Russian criminals and corrupt officials in regions of Ukraine where it held most sway – the Donbas and Crimea – putting them front and centre of its efforts to wield power, either directly in the case of Crimea or indirectly in the case of the LDNR pseudo-states.<sup>24</sup> Organized crime was therefore baked into the political economies of both regions from the beginning.

### Crimea

The annexation of Crimea in February 2014 was mostly executed by Russian special forces without insignia – the 'little green men' – but so-called local self-defence militias also played a significant role. Many militia members were from Bashmaki and Salem, the two main ethnic Russian organized crime groups on the Crimean peninsula. Both groups had a long-standing presence in the Crimea and were involved in various economic activities, including the import and export of metal and oil in the peninsula.<sup>25</sup> After the Russian annexation, Sergei Aksyonov, allegedly a former Salem member known as Goblin, was appointed Crimean premier.<sup>26</sup> Aksyonov denied these allegations, saying



they were part of a slander campaign initiated by his political opponents. In subsequent years, criminal elites appear to have been repaid for their loyalty to Moscow by being allowed to take control of state and private assets.<sup>27</sup>

## **The self-proclaimed LDNR**

In the Donbas region in the east of Ukraine, the self-proclaimed Donetsk and Luhansk People's Republics became pseudo-states dependent on criminal actors and illicit economies for their survival after their Russian-backed rebellion against Kyiv in 2014.<sup>28</sup> Ties between local political and criminal actors in eastern Ukraine had been apparent from the earliest stages of the conflict, when members of criminal gangs were identified joining protests against the new government. Later, as protests gave way to armed seizures of government buildings, they provided a key source of gunmen. As the DNR and LNR began to be institutionalized, figures with criminal backgrounds or networks became part of the new regimes. Some Donbas-based kingpins relocated to government-held areas and were replaced by Russian criminals, helping to further merge the underworlds across Ukraine and Russia.

The new criminalized status quo was quasi-formalized at a secret meeting in December 2014 between thieves-in-law and the new authorities (some of whom also engaged in opportunistic criminality, including expropriation and extortion). Criminal activity was tacitly allowed in exchange for providing kickbacks to local and state authorities, and supplying manpower for the rebellion, as well as allowing new commodities to be transmitted along their smuggling routes. This helped provide desperately needed revenue for the LDNR authorities, rubber-stamped the activities of warlords who were carving out new criminal empires and provided stability for criminal operations.

As the chilling effect of sanctions and political isolation increased, illegal activity became essential to the economic survival of the LDNR. Everything from counterfeit designer goods made in local factories to diesel and petroleum products were trafficked into government-held Ukraine and elsewhere, with the most significant earnings coming from the illegal trafficking of otherwise legal goods, especially coal.<sup>29</sup> The conflict also created lucrative criminal opportunities for trafficking illegal goods and services on both sides, predominantly untaxed and counterfeit tobacco products,<sup>30</sup> drugs, guns, as well as human trafficking, facilitated by criminal collaboration across the line of control. Despite a crackdown on users and dealers, drug trafficking remained robust: heroin, methamphetamines and marijuana were all trafficked through the LDNR with little interruption.

The illicit firearms market expanded as result of the large supply of illegally trafficked weapons into the conflict zone, which outstripped demand.<sup>31</sup> Many weapons spread through Ukraine,<sup>32</sup> while others filtered westwards into neighbouring countries, notably Poland.<sup>33</sup> The flow of weapons also went east, out of the LDNR and into Russia, the bulk of which ended up in the hands of Russian organized crime gangs, which either retained and used them or sold them on. Russia also became the primary destination for people trafficked from the LDNR and Ukraine.<sup>34</sup> The LDNR was also a route used for trafficking humans and to smuggle would-be emigrants westwards, sometimes by land to ports on the Black Sea, especially Odesa, and thence to Turkey, or to Romania, Poland, Hungary and Slovakia (in descending order of magnitude) by land.<sup>35</sup>



Volodymyr Zelensky, shown here, came to power in April 2019 promising to tackle corruption, curb the influence of oligarchs and end the conflict in the Donbas.

© Brendan Hoffman via Getty Images

## Taking the fight to corruption

Amid the growing power of criminal actors in the LDNR and Crimea, the post-2014 period also saw major gains being made against corruption, a key facilitator of organized crime in the country. In the wake of the 2013–2014 Maidan Revolution and under pressure from the West, Poroshenko instituted a wave of reforms aimed at bringing more transparency to government procurement and established the National Anti-Corruption Bureau (NABU), the National Agency on Corruption Prevention (NAZK), the Specialized Anti-Corruption Prosecutor's Office (SAPO) and the Asset Tracing and Management Agency.<sup>36</sup> From 2016, public servants were required to file annual declarations setting out their income and assets – a reform backed by the IMF – which revealed large discrepancies between official salaries and declared cash.<sup>37</sup> A group of reformers, both inside and outside the government, also created a database of politically exposed individuals, again in a drive to improve transparency.<sup>38</sup> Civil society was instrumental in the establishment of the ProZorro system, an online platform that brought the state's procurement processes under public scrutiny.

But there were significant setbacks. Anti-corruption efforts were hampered by lack of progress in judicial reform and political meddling in anti-corruption investigations.<sup>39</sup> As reform slowed and the conflict in the east froze, Poroshenko's approval ratings plummeted, enabling political outsider Volodymyr Zelensky to sweep into power with 73% of the vote in April 2019 on an anti-corruption platform and the promise of ending the



fighting in the Donbas. Although Zelensky courted controversy for his connection to oligarch Igor Kolomoisky – as detailed in the Pandora Papers<sup>40</sup> – there were promising signs of a more concerted fightback against corruption and organized crime. In September 2020, Ukraine adopted the National Strategy Against Organized Crime, which explicitly recognized that organized crime posed ‘a direct threat to national security’ and needed to be tackled as a systemic issue.<sup>41</sup> Zelensky sanctioned 557 thieves-in-law across the world in May 2021, including 17 in Ukraine.<sup>42</sup> In November 2021, Zelensky signed into law a bill aimed at reducing the influence of the country’s oligarchs (a geopolitical as well as criminal issue in the post-2014 period, given the pro-Russian stance of many oligarchs and their control of much Ukrainian media),<sup>43</sup> and another safeguarding the institutional independence of NABU, which had come under fire from the Constitutional Court.<sup>44</sup> However, systemic challenges persisted: lack of judicial reform remained an enduring and trenchant problem, and there were concerns that Zelensky’s anti-oligarch campaign relied on decrees and informal means rather than proper institutionalization of the problem.<sup>45</sup>

This was the reality when the war erupted: a country making uneven attempts to tackle the challenge of organized crime and corruption, host to many pervasive illicit markets and enmeshed in a simmering conflict in the Donbas. Zelensky’s popular support was dwindling, with fears that he, like his predecessor, would not deliver on his vaunted reform agenda, while his handling of the coronavirus pandemic was also criticized.<sup>46</sup> Support from the West for institutional rebuilding was strong, but fundamental obstacles remained in regard to EU membership, which appeared a remote prospect at best. Then came 24 February 2022.






# RECALIBRATION: UKRAINIAN ORGANIZED CRIME IN 2022

Ukrainian refugees near the Polish border shortly after the Russian invasion. © Daniel Leal/AFP via Getty Images





**A**fter weeks of uncertainty, on 24 February 2022 Russia launched a full-scale invasion of Ukraine. Although several analysts had warned that the prior massive military build-up on Ukraine's borders was likely to lead to such an outcome, Moscow's move still caught many by surprise. With Ukraine facing what was perceived as a superior military force, many expected Kyiv to fall in a matter of weeks, if not days.

Ukraine astonished the world by mounting a concerted, fiercely fought and often ingenious resistance. The government immediately imposed martial law, announced the mobilization of the male population aged between 18 and 60 and streamlined procurement, with sensitive state information removed from public view. Zelensky galvanized support among Western leaders to provide military and humanitarian aid that rapidly began to pour into the country once it became clear that the Ukrainians were more than capable of taking the fight to the Russian armed forces. Zelensky invited foreign fighters to assist the country's defence, both at the front line and in the cyber sphere. Refugees fled the country in their millions, mostly to EU countries, while millions more were internally displaced.

These dramatic developments inevitably reshaped the way organized crime operated in Ukraine and interacted with criminal interests in other countries, and this section identifies three key areas of change. The first assesses how organized crime actors have responded to the uncertainty of the conflict, including to what extent organized crime has developed 'patriotic' tendencies and risks of criminal infiltration in fighting units. The second discusses the nascent front line illicit economy in drugs and arms trafficking, and spotlights the new trend in smuggling conscripts away from the fighting. The third area explores the changes that have occurred to illicit markets and flows in the west of Ukraine, where massive inflows of military equipment and humanitarian aid, and similarly large outward movements of refugees, have created new vulnerabilities that organized crime is attempting to exploit. This section also discusses the risks of corruption around another imminent inflow – that of reconstruction funds.

## Criminals in conflict: patriots or parasites?

The Russian invasion posed an interesting conundrum to organized crime actors in Ukraine: stay or go? In the early stages of the war many chose the latter option, with several Ukrainian criminal bosses (and their assets) moving abroad, although their networks and lieutenants remained (one Odesa underworld source said that his boss had moved abroad but was still paying him to ensure his loyalty).<sup>47</sup> Reported destinations for crime bosses included Turkey, the United Kingdom, Germany, Spain, Monaco, Italy, Austria, Israel and Dubai.<sup>48</sup> In some sense, though, this merely represented the acceleration of a trend that had been in place for decades: as bosses grow rich – and their portfolios expand into the licit sphere – they seek to spend their fortunes in more luxurious surroundings than where they first made their name. That said, the end of 2022 also saw the return of several major organized crime figures to Ukraine, who perhaps judged that the security situation had sufficiently improved or that their presence was needed on the ground again.

Our fieldwork also found that some high-level criminal actors were looking for ‘weak points’ abroad where they could redirect criminal operations to avoid the conflict: Romania (Constanza), Bulgaria, Italy (Genoa) and France (Marseille) were cited as potential options.<sup>49</sup> There are significant Ukrainian diasporas in several Eastern European countries, especially Czechia, Romania and Poland, which could provide cover for some criminal actors to either wait out the conflict or start up new ventures. The Baltic states also offer fertile ground for Ukrainian criminals to expand their operations, given that they already have extensive ties in such places.

For those who stayed, however, the war has brought opportunities – and criminals have not been slow to exploit them. (Indeed, there were even reports of foreign criminals relocating to Ukraine, perhaps hoping to use the disruption of the conflict as cover for their activities.)<sup>50</sup> Yet it is also clear that criminal motivations are complex in a time of war, and that patriotic instincts may co-exist, or even coincide, with

self-interest. It is also true that the experience of the war will have a profound effect on soldiers and civilians alike, and that this may in turn serve the ends of organized crime. As such, the war will profoundly shape both the nature and reach of organized crime in the post-conflict period.

### Patriotic criminals?

If pro-Russian criminals helped subvert the authority of the Ukrainian state in 2014, it appears that patriotic criminals helped support it in 2022. At the beginning of the war Moscow once again appeared to turn to its 2014 toolbox, with reports of sabotage and riots in Ukraine orchestrated by criminal groups linked with Russia, but these agitations were quickly suppressed, in part due to the efforts of local organized crime.<sup>51</sup> According to a law enforcement figure, the Security Service of Ukraine (SBU) asked Ukrainian criminals to help detect Russian criminals sent by Moscow to destabilize the situation; within a few months, the source alleged, most Russian criminal actors had been apprehended or ejected from the country.<sup>52</sup> ‘Patriotic’ criminals have also been reported patrolling the streets with the police in Odesa, which hosts a large number of suspected pro-Russian criminals, particularly thieves-in-law who had been ejected from Georgia in the mid-2000s.<sup>53</sup>

In the LDNR, it was reported that due to shrinking space for criminal activity,<sup>54</sup> several thieves-in-law have relocated to unoccupied Ukraine, where they have turned against their former patrons and authorized criminals under their criminal jurisdiction to fight Russia.<sup>55</sup> Ukrainian prisoners in Russian-occupied territory were also warned by one prominent Ukrainian *vor* that joining the Wagner Group would be breaking the thieves’ code.<sup>56</sup>

Patriotic feeling may also be present among those criminals who have joined (or been drafted) into the Ukrainian armed forces, but other motivations may also be at play. Kyiv is aware of such risks – according



to documents seen by the GI-TOC, several known gangsters have been blacklisted from joining the Territorial Defense Force<sup>57</sup> (although many former criminals are known to have enlisted). Infiltration of foreign criminals is another issue in the mix; according to sources, there have been instances of foreign criminal actors active in the fighting. Again, motivation is likely to vary: although some may be motivated by an antipathy to Putin and Russia,<sup>58</sup> others may have an eye on the illicit opportunities of wartime (or conceivably both). Certain units in the hastily formed International Legion<sup>59</sup> may be vulnerable in this regard: in August 2022, the SBU launched an investigation into Piotr Kapuscinski, a commander in the International Legion who had come under increasing scrutiny after allegations of arms and humanitarian aid theft (as have several other Legion commanders). The *Kyiv Independent* revealed that Kapuscinski was a former Polish gangster who had served time for robbery, kidnap for ransom and drug offences, among others, and had been charged in Ukraine with robbery and illegal arms possession – charges that were suspended when he joined the military.<sup>60</sup>

For criminals, then, the conflict may represent a means of resisting Russian aggression, an opportunity for illicit enterprise, a chance to wipe the slate clean (as with Kapuscinski), or some combination of the three. After all, seen through a criminal lens, the conflict is a threat to both territory and profit, neatly aligning issues of patriotism and self-interest. As such, the patriotic tendency of some criminals should not be taken at face value, but could be the end product of a complex calculation inevitably aimed at furthering one or both of organized crime's overriding priorities: money and power.

Organized crime may also benefit from patriotic fervour in a more indirect way: through the recruitment of demobilized soldiers into organized crime groups. This trend was conspicuous in the aftermath of the Soviet war in Afghanistan, when many former soldiers – the *afgantsy* – were recruited by Russian gangs. These veterans, highly trained and experienced in the art of targeted violence, provided effective muscle and protection for bosses, and in

some cases became hitmen.<sup>61</sup> In Ukraine, many of the hundreds of thousands of soldiers may struggle to find employment after demobilization, will be traumatized by their experience, or may simply miss the intense camaraderie of military life, all of which will leave them vulnerable to criminal recruitment. Add ready access to illicit weapons, and the conflict in Ukraine may be incubating a reservoir of criminal violence in the near future. In this sense, state conflict may beget criminal conflict.

There is also the risk of a Ukrainian Wagner-type group emerging from the pool of demobilized personnel. Private military companies (PMCs) are currently banned in Ukraine but they are also banned in Russia, highlighting that legislation may pose little obstacle if the relevant interests align.<sup>62</sup> Groups may also operate illegally – in 2021, for example, two illegal Ukrainian PMCs were broken up<sup>63</sup> – or legislation may change. The example of the Wagner Group in Africa (detailed in a February GI-TOC report<sup>64</sup>) highlights how such a company could become deeply immersed in illicit activity, corruption and state-influencing in fragile contexts overseas, while also potentially expanding the transnational reach of Ukrainian organized crime. As with the Wagner Group, Africa may offer fertile ground for Ukrainian organized crime given that a significant number of pilots of small aircraft and captains of boats and ships on the continent are Ukrainian, providing a ready-made logistics network for illicit activity.

Private security staffed by ex-soldiers may also offer another point of criminal interest in the near future as private sector companies (both domestic and international) seek to safeguard their investment in an uncertain operating climate. (In the aftermath of 2014, construction companies hired former soldiers as muscle to gain access to contested sites; locals also hired ex-soldiers to resist them.) While such businesses are legally registered, their activities may blur into the illicit realm. Private security companies elsewhere have been used as fronts by extortionists seeking to add an official veneer to their use of muscle and intimidation, and a similar trend may manifest in Ukraine.



Pro-Russian oligarch Viktor Medvedchuk seen after he was arrested by the Ukrainian security services. Photo: Ukrainian Presidency/ Anadolu Agency via Getty Images

## End of the oligarchs?

The conflict appears to have offered few political opportunities for Ukraine's oligarchs. Unlike in 2014, when Igor Kolomoisky raised the volunteer 'Dnipro battalion',<sup>65</sup> Kyiv is now able to fight the war itself and is not willing to sanction private armies. The economic cost of the conflict to the oligarchs has also been high: the destruction of Ukraine's energy and industrial infrastructure in the east and south-east of the country has caused several fortunes to plummet by hundreds of millions of dollars.<sup>66</sup> The implementation of Zelensky's 'deoligarchisation' law has been put on hold while the conflict rages, but in the course of 2022 several oligarchs divested their media holdings and vacated political offices to avoid being targeted by the bill.<sup>67</sup> Pro-Russian oligarchs such as Viktor Medvedchuk, who ran the Opposition Platform–For Life, was handed to Russia in a swap for Ukrainian soldiers.<sup>68</sup>

Several commentators have indicated that the combined effects of conflict, deoligarchisation and Ukraine's anti-corruption agencies could spell the end of the oligarch as an institutional feature.<sup>69</sup> This could have profound beneficial effects for Ukraine, but predictions of the oligarchs' demise may also be exaggerated. Previous generations of oligarchs have come and gone – sometimes violently, as with the 1996 assassination of Yevhen Shcherban – yet they have always been replaced. Much will depend on the state's post-conflict ability to implement and enforce its pre-conflict anti-corruption and -oligarch agenda.<sup>70</sup>

## The fighting economy: drugs, guns and draft dodgers

The front line of 2014 bears little resemblance to that of 2022, although it does offer several cautionary points. After several months of intense fighting in 2014 – mainly between local insurgents and hastily formed and loosely controlled volunteer militias, the Donbas front line became effectively frozen, albeit with periodic outbursts of violence. This relative stability enabled smuggling and other criminal activities across the front line to continue with little disruption; neither was the political antipathy between Ukraine, the LDNR or Russia any obstacle to illicit business (see 'Criminal geopolitics' above).

The wider conflict that began in 2022 may follow a similar trajectory and reach a point where violence around the front line reduces (and thus enables cross-line smuggling), but the intense fighting and extensive territorial changes of 2022 have so far created a degree of uncertainty and risk that has drastically hindered much criminal business, especially drug trafficking from east to west Ukraine. In other aspects, though, the volatile front line has emerged as a catalyst for illicit activity, namely in the areas of





synthetic drugs, the grey economy in arms collection and trading (and allegations of leakage), and the rise of a new market in smuggling men out of the country who are trying to escape the military draft.

**Culture House in Lysychansk in flames after Russian shelling, Luhansk region, June 2022.**

*Photo: GI-TOC*

## **Under the influence: drugs on the front line**

In November 2022, during fieldwork conducted for this research, a Ukrainian soldier was encountered in Bakhmut in a state of high agitation.<sup>71</sup> He appeared to be under the influence of a powerful narcotic, most likely amphetamine or a similar stimulant – and he is by no means an anomaly. Kyiv appears to be increasingly concerned about growing drug use among soldiers: the Verkhovna Rada (Ukrainian parliament) swiftly passed a law in December 2022 that authorizes ad hoc testing of military personnel for drugs and alcohol.<sup>72</sup>

That drugs are present on the front line should not be surprising: soldiers have used drugs throughout history, either as stimulants to help them fight<sup>73</sup> or as ways of escaping the harrowing trauma of warfare. But seen through the eyes of organized crime, these soldiers represent merely a new and lucrative market. At the start of the conflict, monthly pay for front line soldiers in Ukraine was increased to 100 000 Ukraine hryvnias (UAH) (US\$3 400 at the time), giving them significant spending power in a country where the official average salary in September 2022 was UAH 14 500 (US\$360) per month.<sup>74</sup>

Before the conflict, Ukraine was a source, consumer and transit country for a wide array of drugs, including heroin from Afghanistan trafficked along the northern route and cocaine from Latin America entering mainly through the port of Odesa, although the domestic market for cocaine was limited due to high local prices (US\$200–US\$250/gram).<sup>75</sup> Since 2015, use of synthetic drugs – including mephedrone, methamphetamine, methadone, alpha-PVP and MDVP – has risen sharply in Ukraine, with products readily available online.<sup>76</sup> Before the Russian invasion, most synthetic drugs came through the western border, but domestic production was also increasing, with labs in the Donbas and Kharkiv producing methadone and other synthetic drugs, with part of production reserved for export. The increase in domestic production is reflected by the dismantling of some 67 amphetamine labs in 2020, up from only five in 2019.<sup>77</sup>

The Russian invasion drastically disrupted drug trafficking flows (heroin and synthetic drugs) from the Donbas region (which had continued despite the 2014 LDNR uprisings) and in the important transit city of Kharkiv. The Russian naval blockade of Odesa and Mykolaiv also made cocaine trafficking challenging, while the flight of many of cocaine's wealthy consumer base abroad also depressed prices, with reports of a 25% drop.<sup>78</sup>

But while heroin and cocaine flows have languished because of the conflict, the supply of synthetic drugs soon rebounded. After initial disruption in Kyiv in the early days of the war,<sup>79</sup> illicit distribution picked up once again throughout the country by means of online stores, street dealers and the postal system.<sup>80</sup> Indeed, according to the data from the general prosecutor's office, criminal offences related to the distribution of illegal drugs actually rose, from 29 587 in 2021 to 34 398 in 2022.<sup>81</sup>

Traffickers may be drawing more heavily from sources in Western Europe to make up for the drop in supply from eastern Ukraine, but local production also appears to be robust. Although the ECDMMA reported that it was likely that domestic production of amphetamine, 'street' methadone and new psychoactive substances would be disrupted due to precursor and other chemical shortages,<sup>82</sup> there have been several major busts of synthetic drug labs in central and western Ukraine in 2022, with INTERPOL reporting that according to their upstream and downstream monitoring, flows appeared to be continuing almost unabated.<sup>83</sup> One seizure in August saw 16 kilograms of methadone and 1 kilogram of amphetamine seized in Kyiv intended for sale through online stores, along with hand grenades and five firearms.<sup>84</sup> A November bust in Kyiv uncovered a lab and 30 kilograms of mephedrone and narcotic substances worth US\$675 000.<sup>85</sup> Other narcotics seized include alpha-PVP and ecstasy.

According to the Ukrainian State Bureau of Investigation, synthetic drugs are being sold in all regions of Ukraine – including the front line.<sup>86</sup> In the first six months after the invasion, Ukrainian law enforcement launched more than 270 investigations into drug trafficking at the front line.<sup>87</sup> In military units where drug use was witnessed, cannabis was overwhelmingly the most-used drug by soldiers, although synthetic drugs were also readily available. According to sources close to law enforcement, a major player in the front line drugs trade is Khimprom, a transnational organized crime group that has a long-standing presence in both Russia and Ukraine and which has resisted repeated efforts to dismantle it.



To reach this market, organized crime has had to overcome the obstacle of the numerous checkpoints along Ukraine's roads. According to an interviewee, one reported method of smuggling drugs involves placing the drugs inside the body of a submachine gun that has had its working parts removed.<sup>88</sup> But corruption is also likely to play a major facilitating role, with reports of routine checks being waived for certain vehicles.

### **Powder keg: weapons in the grey zone**

Since February 2022, weapons have been arriving in Ukraine at an extraordinary rate. Given Ukraine's history of arms trafficking (rated as the country's most pervasive criminal market, according to the GI-TOC 2021 Global Organized Crime Index), the risk of weapons trafficking was flagged in the early days of the war by Europol, among others.<sup>89</sup>

Overall, diversion of arms has been more limited than initially feared. Of the billions of dollars' worth of weapons the West sent to the Ukrainian armed forces in 2022,<sup>90</sup> there have been few reports of missing weapons. (In October, the US said it had only one verifiable example of a weapons system being smuggled out of Ukraine, to Russia.)<sup>91</sup> In the



Weapons stockpile at Ukrainian position in the Donetsk region, November 2022. *Photo: GI-TOC*

main, this has been due to a high degree of awareness over the risks of arms trafficking and the implementation of mechanisms to counter it. In July 2022, the Ukrainian parliament set up a commission to monitor the flow and use of arms in Ukraine,<sup>92</sup> the US has implemented a framework that appears to have been effective in preventing significant leakages in weapons travelling to the front line,<sup>93</sup> and the EU has established a hub in Moldova to tackle trafficking in arms and people.<sup>94</sup> The types of weapons involved may also have had a bearing on leakage risks: in the early days of the war small arms formed a substantial element; now arms flows mainly involve larger systems and spare parts that are relatively less conducive to illegal diversion. The intense nature of the fighting is also likely to have a dampening effect on leakages, with significant quantities of weapons and ammunition being deployed by fighters as soon as they reach the front. Most allegations of trafficking Western weapons are unsubstantiated or appear to be the result of Russian disinformation (see 'Conflicting accounts: Arms trafficking to Finland?').<sup>95</sup>

There is inevitably some leakage, however, and the biggest risk on the Ukrainian side is likely to come in the form of 'bad apples' – units or commanders who engage in misappropriation under the fog of war. Some units of the International Legion have seen claims of weapons misappropriation: in December, a returning British mercenary who had served in the Legion alleged that two trucks of Western-supplied weapons and ammunition – including Javelins – had 'disappeared' from his convoy. Although this information has not been verified, other allegations of stolen arms have been reported in the Legion.<sup>96</sup> Sources also reported that weapons from a stockpile used by an International Legion unit were moved in civilian vehicles from a city in the south to an undisclosed destination.<sup>97</sup> It is also possible that weapons are being hidden in caches around the front line, to be collected and sold on the black market at a later date, as happened during the 2014–2022 Donbas conflict.<sup>98</sup> (Since the World War II, there has been a tradition of Ukrainians burying weapons for later use, leading to the idiom 'we water our flowers with oil'.)<sup>99</sup>



**Screenshot of video showing Ukrainian soldiers receiving ammunition collected by a Ukrainian woman, highlighting the ready availability of discarded weapons in the grey zone.**

*Photo: Korrespondent, 12 November 2022, <https://ua.korrespondent.net/ukraine/4534737-khersonska-babusia-vkrala-boieprypasy-v-okupantiv-ta-peredala-zsu>.*

The control situation is starkly different when it comes to Russian materiel, which has been abandoned in huge quantities during the conflict, particularly during the sweeping Ukrainian counterattack that reclaimed 3 700 square miles of occupied territory in a month.<sup>100</sup> These 'trophy' have driven the emergence of what one Ukrainian soldier described as 'a simplification of bureaucracy' in which captured Russian materiel is exchanged for other military equipment, with swaps between Ukrainian units negotiated on Telegram. Although no evidence of leakage to the illicit market has been reported, an analyst for Small Arms Survey highlighted that this type of unofficial exchange could undermine stockpile management procedures, potentially increasing the supply of untracked weapons that could enter the illicit market at a later date.<sup>101</sup>

But soldiers are often not the first to scour the battlefield. Villagers have been reported collecting abandoned weapons and ammunition, and storing them at home, with some cases of tanks being stored in barns. Many of these 'grey' stockpiles are turned over to the Ukrainian army, but there have been isolated incidents of people picking up 'trophy' around the front line and selling them on the black market. In November



2022, the State Border Guard Service detained a man trying to sell a grenade launcher, a flamethrower and 20 F-1 grenades – equipment he had collected in the grey zone after the Russians had retreated.<sup>102</sup> In December, several police personnel in Odesa were seriously injured after an anti-tank round exploded. The ammunition had been smuggled to Odesa in the trunk of a car driven by a volunteer, who claimed he had brought it and other ammunition from the Mykolaiv region as ‘souvenirs’.<sup>103</sup> Tellingly, the domestic arms market has continued to function throughout the war, with reports of domestic arms dealers selling hand grenades, explosives, machine guns, ammunition and anti-tank RPGs.<sup>104</sup> It is also salient to reflect that given the prevalence of checkpoints in Ukraine since the war started, these weapons could not have moved unless the traffickers were operating as military personnel, or with the collusion of corrupt checkpoint guards.

Away from the front line, alarm has been raised over the 18 000 assault rifles distributed by the authorities to civilians in the early days of the war.<sup>105</sup> According to a senior source in the police: ‘All weapons, including the ones we give to civilians, are registered. The police check their background and take forensic precautions.’<sup>106</sup> But tracking and ultimately reclaiming these guns will be no easy task, and there are fears they may add to the huge number of unregistered small arms already in civilian hands (with some upper-level estimates of 3 million to 5 million weapons before the invasion).<sup>107</sup>

## Conflicting accounts: Arms trafficking to Finland?

An example from Finland highlights the sensitivities that have surrounded claims of arms trafficking around the conflict in Ukraine. In October 2022, Detective Superintendent Christer Ahlgren of the Finnish National Bureau of Investigation gave an interview in which he said that criminal gangs had been smuggling Western weapons intended for Ukraine into Finland, Denmark, Sweden and the Netherlands.<sup>108</sup> Ahlgren’s claim was swiftly refuted by the deputy director of the bureau, who said the bureau had no information that Ukraine-bound weapons had been smuggled into Finland, and by Ukraine’s Ministry of Internal Affairs, which asserted that the claim was the result of Russian disinformation.<sup>109</sup>

Faced with these conflicting accounts, in December 2022 the GI-TOC commissioned a fact-finding report from a researcher with extensive experience in Finnish law enforcement. Two sources – one in law enforcement, another from the underworld – both reported that three Finnish criminal figures had travelled to Ukraine or eastern Poland soon after the Russian invasion with the intention of bringing back weapons, but failed to do so, as they lacked the necessary organizational skills or access to financing. As such, there appears to be no evidence to support Ahlgren’s claim of arms trafficking from Ukraine to Finland, although Finnish police have reportedly mapped all possible trafficking routes and expect Poland to become a major hub of illicit arms in the future.

Collectively, the rise in untracked, misappropriated and found weapons will play into the hands of criminals assembling illicit stockpiles for exploitation at a later date when the fighting is not so intense and the ambit for arms trafficking expands, as occurred when the fighting in 2014 settled into a stalemate.<sup>110</sup> Already there are signs that guns are playing a greater role in crime in Ukraine: according to data from the general prosecutor's office, recorded offences committed with firearms and ammunition rose tenfold in 2022, from 720 in 2021 to 7 003 in 2022.<sup>111</sup> As such, arms trafficking poses a clear and present danger, both within Ukraine and abroad.

### Draft dodgers: human smuggling

Faced with the massive disparity in personnel between the Russian and Ukrainian armed forces, on 24 February 2022 Zelensky ordered the mobilization of Ukraine's adult male population between the ages of 18 and 60; all those eligible for service were unable to leave the country.<sup>112</sup> For human smugglers, this created a whole new clientele, and business has been brisk: between February and October 2022, more than 8 000 conscripted men were caught attempting to cross the border, with 245 recorded attempts to bribe border guards<sup>113</sup> – but many more are likely to have succeeded. Moldova and Poland are the preferred exit routes, with small groups of people crossing at a time at a cost of between €5 000 and €10 000 each,<sup>114</sup> although some conscripts choose to escape to the EU via Russia.<sup>115</sup> Such is the demand and revenue on offer that some smugglers of alcohol and tobacco have reportedly switched to smuggling conscripts. There have also been reports of actors with no prior criminal background setting up sophisticated smuggling schemes.<sup>116</sup>

Corrupt professionals, including lawyers and doctors,<sup>117</sup> have facilitated the market by forging official statements, including 'fictitious documents' about the removal of conscripts from the military register and 'letters from state authorities to the State Border

Men report to enlist in the Ukraine military. Zelensky ordered a conscription of all men between the ages of 18 and 60.  
© John Moore via Getty Images







Service'.<sup>118</sup> A counterfeit certificate of unfitness for military service costs approximately US\$2 000.<sup>119</sup> In January 2023, the Ministry of Internal Affairs reported that Ukrainian border guards had discovered almost 3 800 forged documents at checkpoints since the beginning of martial law, most around the border with Poland and Hungary.<sup>120</sup>

The GI-TOC received information that much more sophisticated fake documentation is also used, sometimes with corrupt officials inserting fake information into official databases.<sup>121</sup> The National Agency on Corruption Prevention (NAZK) reported a scheme in which a fake charitable organization was set up in order to enter fraudulent information in the Shlyah database to enable it to register conscripts as carriers of humanitarian aid. (The Shlyah system allows those transporting humanitarian aid, medical supplies or cars for the armed forces to travel outside Ukraine for a maximum of one month.)<sup>122</sup> The head of one charity fund in Lutsk was accused of helping approximately 300 men of draft age to go abroad by offering them roles as 'drivers' of humanitarian cargo.<sup>123</sup>

**Ukrainian border guards have discovered thousands of counterfeit certificates of unfitness for military service presented by those wishing to avoid conscription.**

© ShapikMedia/Ukrinform/Future Publishing via Getty Images

## **New vulnerabilities: people, smuggling, corruption**

Since February 2022, Ukraine's national colours have become a common sight across Europe. Paper hearts coloured blue and yellow appeared in living room windows, the Ukrainian flag adorned public squares, embassies and monuments. But these were no mere shows of solidarity: in a surprisingly coordinated and timely manner, European governments sought to alleviate the fallout of the unfolding crisis in the east with concrete action. Millions of refugees were expedited across national borders, aided by the

EU activating the Temporary Protection Directive (TPD) on 4 March 2022, while international partners sent vast quantities of humanitarian aid to those still in Ukraine, working closely with Ukrainian organizations.<sup>124</sup>

For organized crime, which thrives off crisis and largesse alike, the opportunities surrounding these flows were manifold. Displaced people can be trafficked; lower border controls help the logistics of illicit flows; humanitarian and financial aid can be embezzled, and workers extorted. And given Ukraine's long-standing history of corruption, the billions of dollars in reconstruction funds promised to be the biggest prize of them all.

## **Preying on the displaced: human trafficking**

The conflict in Ukraine precipitated the swiftest and largest refugee migration in Europe since World War II.<sup>125</sup> As of 18 November 2022, the UN had recorded some 7.8 million Ukrainian refugees in Europe and the International Organization for Migration estimated that there were 6.5 million IDPs as of 27 October.<sup>126</sup> According to the UN Office for the Coordination of Humanitarian Affairs (OCHA), there were at least 17.7 million people in Ukraine in need of humanitarian assistance and protection in August 2022.<sup>127</sup>

Ukrainian traffickers were well placed to exploit these opportunities, given that human trafficking was deeply entrenched in Ukraine before Russian invasion of 2022.<sup>128</sup> Forced labour and sex trafficking occurred both within Ukraine and abroad, with domestic and foreign victims trafficked to Europe, Asia, the Caucasus and Dubai. Children were an especially vulnerable population, particularly the 100 000 children in state-run orphanages.

Given this context and the scale of population movement, many observers swiftly raised the alarm over the increased risk of human trafficking,<sup>129</sup> but the extent to which these fears were realised in 2022 remains uncertain (with the exception of Russian-occupied areas; see below). At the time of writing, data was scarce, both on internal trafficking dynamics within Ukraine and among Ukrainian refugees, but this should not be taken to indicate a lack of criminal activity, especially for human trafficking, which often deprives its victims of voice and agency, and reduces capacity for detection.

Within Ukraine, it appears likely that several forms of human trafficking, especially sexual exploitation, have continued with little interruption and may have even expanded, although the curfew may have forced brothels and other sites of exploitation to alter their hours of operation. According to GI-TOC research, online listings of sexual service providers in Ukrainian cities have begun appearing in English as well as Russian and Ukrainian, indicating an expanding client base drawn from the diverse international actors now in-country. Some foreign fighters have reportedly used the opportunity of being in Ukraine to seek sexual services, a significant proportion of which will be rendered by women in exploitative situations.<sup>130</sup>

As the war continues, it is likely that human trafficking within Ukraine will expand as poverty and hardship increase. Loss of income and the volatility of the conflict dynamics are pushing vulnerable women, who often have to support dependants, into situations where they are being sexually exploited at home and abroad. In July, Ukrainian officials arrested a Kyiv-based ringleader accused of orchestrating a trafficking ring that sent women recruited on Telegram to work as escorts abroad to Turkey, where they were instead sexually exploited. One of the intercepted women was a single mother who had lost her job following the Russian invasion and had a child to support, and it is likely that many of the other victims had similar profiles.<sup>131</sup> Online sexual exploitation, which can be conducted from home, is likely to follow a similar trend



as desperate parents either exploit their own children<sup>132</sup> or sanction their exploitation by others in return for money or essential goods.

Outside Ukraine, there have been reports of exploitation of Ukrainian refugees. For the most part, such incidents appear to be of an individualistic and opportunist nature,<sup>133</sup> but there have been troubling signs of more organized exploitation. In April, for example, an Italian investigation into counterfeit cigarette production discovered several Ukrainian refugees who had been forced to work long hours in unsanitary conditions;<sup>134</sup> in October in Northern Ireland, police said that cross-border gangs had been targeting Ukrainian refugees for sexual exploitation.<sup>135</sup> Two 'hackathons' run by Europol highlighted how traffickers were also going online to target Ukrainian refugees for sexual and labour exploitation. The first hackathon in May 2022 found 'a significant number of suspicious job offers' targeting Ukrainian women (see also "Modelling" in Marrakesh'),<sup>136</sup> while the second in September found 30 online platforms related to vulnerable Ukrainian refugees, five suspected traffickers of Ukrainians and 25 possible Ukrainian victims.<sup>137</sup>

## 'Modelling' in Marrakesh

In November 2022, an investigation in Kyiv exposed a sophisticated sexual exploitation ring formed of three Ukrainians and one Moroccan that targeted former participants in beauty contests, presenters of TV talk shows and Instagram bloggers. These Ukrainian women were offered work in the 'modelling industry' in

Morocco, but were instead destined to provide sexual services to businessmen in Marrakesh. The operation was highly sophisticated, with one member responsible for securing visas and two in charge of transport logistics. Law enforcement disrupted an attempt to smuggle 20 women across the border.<sup>138</sup>



© Ferda Demir/Getty Images

In the medium term, the vulnerability of Ukrainian refugees to trafficking is likely to increase as receiving-nation fatigue grows and as the hospitality of host families declines due to the rising cost of living and stress of long-term cohabitation. The extension of the TPD until March 2024 formally recognizes that the crisis will not come to a swift conclusion, but the transition from short-term assistance to long-term support will bring challenges. As refugees settle in host countries, issues of financial hardship, social isolation, language barriers, the difficulty of obtaining employment and trauma from the experience of war will serve to heighten trafficking risks. This problem is likely to be especially acute in countries with large refugee populations such as Poland (host to nearly 1.5 million refugees), Romania and Hungary, but risks will also apply in Western Europe and Scandinavian countries. In Sweden, Ukrainian refugees can claim only very limited daily financial support (the same amount as that offered to asylum seekers), with purchasing power further eroded by high inflation.<sup>139</sup> Ukrainian refugees have also struggled to gain access to the digital identity system BankID, which is necessary for accessing many services.<sup>140</sup> In the UK, many Ukrainian refugees have found themselves facing homelessness as their initial six-month stays with families came to an end and few replacement hosts came forward.<sup>141</sup>

Trafficking risks are also high for Ukrainian refugees returning home to a devastated country where jobs are scarce and living conditions dire. Returns began after the liberation of Kyiv in mid-April 2022 and have gathered pace since, despite pleas by the government for refugees to stay abroad to avoid the hardship of a winter with limited access to energy.<sup>142</sup> In September 2022, the IOM estimated that more than

A family of Ukrainian refugees arrive in Poland, December 2022. Since the beginning of the invasion, some 7 million refugees are estimated to have crossed the Polish border to flee the conflict.  
© Dominika Zarzycka/  
NurPhoto via Getty Images





Ukrainian civilians evacuated from Kherson before the advancing Ukrainian forces. Some were forcibly removed from occupied territories to Russia. © *Stringer/AFP via Getty Images*

6 million Ukrainians (IDPs and refugees) had returned at their habitual places of residence, with 85% indicating that they intended to stay.<sup>143</sup> Among this population will be many people returning to war-torn areas who will be highly vulnerable to trafficking.



An alarming development in Russian-occupied territories has been the forced movement of Ukrainians into Russia, especially from Kherson, Zaporizhzhia and Pryazovia (Mariupol) regions. Estimates of numbers have varied substantially, especially in regard to children: in July, the US State Department estimated that between 900 000 and 1.6 million Ukrainians had been forcibly deported to Russia, including 260 000 children.<sup>144</sup> In December, the Office of the Ukrainian Parliament Commissioner for Human Rights said that it had confirmed instances of more than 12 000 Ukrainian children in Russia, of whom approximately 8 600 had been forcibly deported.<sup>145</sup>

These forcibly dislocated populations will be extremely vulnerable to exploitation in Russia, especially women, older people, people with disabilities and orphaned or unaccompanied children, with the latter category targeted for 'Russification' through expedited Russian citizenship and adoption. In October 2022, the Ukrainian Ministry of Foreign Affairs said that the Russian commissioner for children's rights, Maria Lvova-Belova, had admitted the illegal adoption of 350 children into Russia from the occupied areas of the Donbas region.<sup>146</sup> (Lvova-Belova herself adopted a teenage boy from Mariupol.)<sup>147</sup> We have reports of children in Russian-occupied areas being used as 'spotters' by the Russian military. This issue was also raised in January 2023 by the Ukrainian Defence Minister, who said that Russia was trying to make Ukrainian children 'unknowingly provide information about the location of strategically important objects through a mobile game'.<sup>148</sup>

## Wandering aid and 'smuggling sans frontières' in western Ukraine

The intense fighting in eastern and south-eastern Ukraine, together with the Russian naval blockade, heavily disrupted smuggling flows into, through and out of Ukraine. Odesa lost its status as the main smuggling hub in the Black Sea, a development that drove all the major criminal players to leave and which significantly impacted regional trafficking dynamics (to be explored in a forthcoming GI-TOC report).<sup>149</sup>



**A border signpost in Volyn, a region known for illicit cross-border flows of various commodities, including firearms, cigarettes and timber.**

© Reuters/Gleb Garanich via Alamy

The direction of the flow of illegal goods has instead reversed. Whereas, formerly, the dominant direction was from the east and south to the west (the gateway to Europe), looser border controls and the suspension of customs duties designed to help the flow of refugees and humanitarian and military aid has driven a boom in smuggling in the west of the country in 2022 (although the south-west connection is still operational). Corrupt figures within customs and the border service in particular have profited from the huge increase in freight traffic by levelling tolls: at the very beginning of the war, amounts mentioned by sources ranged from US\$100 for a car to US\$30 000 for a truck.<sup>150</sup> At the beginning of the war, GI-TOC researchers also heard reports that those who did not pay, including humanitarian convoys, were forced to remain in a queue for up to several days.

This surge in smuggling activity has been reflected in the recalibration of major illicit routes in the west of Ukraine. The Volyn region in north-west of the country (bordering Belarus<sup>151</sup> and Poland) was already known for smuggling cigarettes, timber, agricultural products, weapons and amber. In 2022, there were two new flows along this route: the smuggling of men attempting to escape Ukraine's military draft, and drugs (both into and out of Ukraine). The regions of Transcarpathia (bordering Slovakia and Hungary) and Chernivtsi (bordering Romania and Moldova) saw increases in illicit exports in traditional illicit goods of timber, illegal immigrants and cigarettes along with new flows of humanitarian and military relief goods, cars, medicines and dual-use goods and the smuggling of conscripts. One exception to the trend for increasing criminal activity in the west was the dwarf pseudo-state of Transnistria on Ukraine's southwestern border, whose importance as a corridor for contraband is said to have declined significantly due to tightened Ukrainian border control in the face of the strong Russian military presence in Transnistria.



Illicit flows through Poland grew in importance due to the crossing of millions of refugees, with reports of illegal refugees, including from Central Asia, posing as Ukrainian refugees to gain access to the EU. Poland has also been the main channel for the humanitarian aid that has been pouring into Ukraine. This aid has been granted a simplified customs procedure, which criminals have taken advantage of to smuggle illegal goods such as drugs and weapons into the country, but this streamlining also enables theft of humanitarian aid itself.

Evidence of theft of humanitarian aid and military items have been detected across Ukraine. In June, the Ukrainian interior minister said that most cases of theft of such aid (some of which was domestically produced) were registered in Kyiv, Lviv, Kharkiv and Kirovohrad, including theft of cars intended for the army, fuel, medicines, body armour and food.<sup>152</sup> One high-profile instance came in October, when it was reported that the deputy head of the Office of the President was driving an SUV that General Motors had donated to Ukraine for humanitarian purposes.<sup>153</sup> Senior officials were also implicated in the potential misappropriation of humanitarian aid in the Zaporizhzhia region in August 2022; during searches in the Zaporizhzhia City Council, investigators found a large amount of cash and unregistered firearms.<sup>154</sup>

Criminals also made use of the cybersphere to exploit humanitarian aid, or the expectation of it. In the early stages of the war, sources claimed that criminals posing as humanitarian workers were posting harrowing pictures on social media to obtain donations of water, diapers and food, much of which they then offered on the black and legal markets – in the latter case sometimes for PR purposes.<sup>155</sup> In another reported case in June, it was revealed that Ukrainian hackers had created a phishing website that promised financial assistance from the EU if victims entered their account details – details that were then used to access the victims' accounts and steal money.<sup>156</sup>



Workers cleaning central square in Borodyanka, Kyiv region, after de-occupation, June 2022. The monument to national poet Taras Shevchenko was shot in the head by Russian forces. Photo: GI-TOC

## Smoking hot: Contraband and counterfeit tobacco

Contraband and counterfeit tobacco are mainstay illicit commodities in Ukraine,<sup>157</sup> with the black tobacco market valued at US\$2 billion in 2009.<sup>158</sup> This industry appears to have thrived during the conflict. The Kantar Ukraine Institute reported in October that illicit tobacco products accounted for 21.5% of the Ukrainian tobacco market, a rise of 5 percentage points on 2021.<sup>159</sup> Almost 8.5 billion illicit cigarettes were sold in the first ten months of 2022, equalling the entire 2021 total, and costing the state over half a billion dollars in lost taxes.<sup>160</sup> There have been several significant busts throughout the year: in August, 1.2 million packs of counterfeit cigarettes – marked with counterfeit excise stamps – worth UAH 70 million (US\$1.9 million) were seized in warehouses in Odesa, while in November, more than five tonnes of tobacco worth UAH 1.3 million (US\$35 000) was seized in the Khmelnytskyi region, along with falsified freight bills.<sup>161</sup>

According to fieldwork for this report, cigarettes without duty stamps have become a common sight in markets across Ukraine in 2022 – before the conflict, the police would have seized all such products. The front line has become a particularly lucrative market for illegal cigarettes, due to high demand among soldiers, although for many people engaged in the trade, selling illegal cigarettes is one of the few means of making ends meet.

## Reconstruction: a lucrative prospect

The damage to the fabric of the Ukrainian state as a result of the Russian invasion has been catastrophic. As of 1 September 2022, the Kyiv School of Economics estimated the total amount of damage caused to Ukraine's infrastructure at more than US\$127 billion.<sup>162</sup> And the costs of reconstruction and recovery will be even higher. In September 2022, the World Bank, Ukrainian government and European Commission estimated that US\$349 billion was required for reconstruction and recovery in the period till 1 June 2022 alone – and this figure will have grown much higher in subsequent months.<sup>163</sup> In July 2022, the Ukrainian government set out a 10-year reconstruction plan predicated on US\$750 billion in investment.<sup>164</sup>

These reconstruction funds may enable Ukraine to reshape itself as a stronger country than before the war<sup>165</sup> but they are also vulnerable to corrupt actors and criminal groups. Corrupt officials may take advantage of the lower levels of transparency characteristic of wartime to divert funds to chosen partners.

At the lower end of the organized crime spectrum, reconstruction efforts may be hampered by widespread theft of materials, while more sophisticated depredation may see organized crime groups inserting themselves in reconstruction projects, both on the ground and at the procurement stage. The construction industry in Ukraine was already plagued with allegations of criminality and corruption before the invasion, ranging from the illegal granting of permits and sale of land to raw materials (for example, illegally mined sand). Before the invasion, construction in Kyiv was dominated by the so-called 'construction mafia', and a similar situation applied in Odesa, with the reported involvement of high-level political actors.<sup>166</sup> A key development in this space will be Law 5655, passed in December 2022 and intended to increase transparency and urban planning control, though some have flagged that it may also give developers greater control and increase the risk of corruption in certain quarters.<sup>167</sup>

Two egregious examples of government funds being misappropriated in 2022/3 highlight the nature and scale of these risks. In November, two media investigations found that UAH 1.5 billion (approximately US\$40 million) had been paid out in the course of 2022 to a relatively small company known as Budinvest Engineering for the repair of roads in Dnipropetrovsk region.<sup>168</sup> This was far more than had been paid out to any other region – an especially glaring fact considering that the region had suffered relatively little damage due to the war. Suspicions were further aroused by the revelation that 49% of Budinvest Engineering was owned by a female fitness instructor who was romantically connected to the head of the Dnipropetrovsk Regional State Administration. Although the investigations flagged suspicions of overpricing and possible inventory fraud of purchased raw materials, the wartime suspension of the publication of state contracts makes it impossible to ascertain the existence or extent of illegality.

The second example came in January 2023, when the Deputy Minister of Infrastructure and Communities Development was arrested and dismissed after reportedly accepting a US\$400 000 cash bribe associated with a government contract to purchase generators and other equipment for UAH 1.68 billion (US\$46 million).<sup>169</sup> The minister was one of the highest-profile officials ever to be arrested under such charges in Ukraine.

Photo: GI-TOC



Corrupt public servants siphoning off state cash may appear to be merely a sophisticated form of theft, but it also has profound ramifications for criminal governance. As well as hampering the delivery of civic services, corruption builds patronage networks, enriches criminal middlemen and undercuts democratic principles of transparency and accountability. GI-TOC fieldwork has found evidence of this pattern in several large cities in east and central Ukraine, where local criminal kingpins work in sync with high-level corrupt officials.<sup>170</sup> This phenomenon is already well entrenched in Ukraine, where corrupt officials have turned many regions and localities into ‘feudal estates’, in the words of Andriy Kaluzhynskyi, the head of the main unit of NABU detectives.<sup>171</sup> As billions of dollars flow into the country for reconstruction, there is a real risk that these estates may be strengthened into criminal fortresses.

## Golden eggs: Corruption in military food procurement



A military field kitchen in Dnipropetrovsk Oblast. © Vitalii Pavlenko/Global Images Ukraine via Getty Images

While many will be focused on the future risks of corruption around reconstruction, it is also vital not to overlook the corruption opportunities that have arisen in 2022 as a result of the war effort. In January 2023, the deputy defence minister resigned over a corruption scandal regarding food procurement for the military.<sup>172</sup> Just days prior, a journalist had revealed that the army had signed a contract in December 2022 for food for units stationed well away from the front line.<sup>173</sup> Comparing the military purchase price with the price of food both before the invasion (adjusted for inflation) and in Kyiv’s supermarkets, the journalist found that the military was paying between twice and three times

over the going rate for certain staple goods. For example, the military’s purchase price of eggs was UAH 17 per unit, while eggs were retailing in Kyiv at the same time for UAH 7 per unit; potatoes were purchased at a similarly inflated mark-up. In the context of a contract worth UAH 13 billion (approximately US\$353 million, as of mid-December 2022) these differentials amount to millions. It is also worth noting that this contract was signed without any public scrutiny due to the suspension of the ProZorro procurement system, again highlighting the risks of lessening transparency and accountability during wartime.




ІТ «УКРАЇНА – ЄС» КИЇВ, 3 ЛЮТОГО 2023  
UKRAINE SUMMIT KYIV, 3<sup>rd</sup> FEBRUARY 2023



# NEXT STEPS

Zelensky and President of the European Commission Ursula von der Leyen address a press conference following the Ukraine–EU summit, February 2023. © Yevhen Kotenko/Ukrinform/Future Publishing via Getty Images





**F**rom the vantage of January 2023, the time of writing, much remains uncertain about the course of the conflict. Peace appears a distant prospect, with both sides' initial negotiating positions mutually unacceptable. Ukraine's stated goal is to reclaim all occupied territory, including Crimea; Russia has amended its constitution to incorporate the four regions illegally annexed by Moscow in 2022 as Russian in perpetuity (despite Moscow losing control of large parts of them during the Ukrainian counterattack). Zelensky has said there will be no peace talks while Putin remains in power,<sup>174</sup> yet although the Russian president has been undeniably weakened by Russia's performance in the conflict, there is no sign of a coup or even a viable rival.

What this situation means for organized crime is difficult to say in detail, but as this report has demonstrated, general outlines may be predicted. At the regional level, a dialling-down in the level of violence will give Ukrainian organized crime more breathing room to restore transnational and cross-country smuggling channels in the east – and relationships with their Russian counterparts. If the example of the 2014–2022 conflict in the Donbas is any indication, reduced levels of violence will allow arms traffickers to begin exploiting their illicit stockpiles in earnest, both domestically and overseas, with Poland likely to see a spike in flows. The transnational flow of drugs, coal and other illicit commodities between Russia and Ukraine may also resume.

But if the pitch of violence remains high, more permanent shifts in trafficking routes may evolve in order to bypass the conflict. Major seizures in 2019 indicated that heroin was sometimes transported through Russia via Belarus and Poland to Western Europe, and it may be that this route becomes more prominent, although given the regional situation, flows may instead increase along the southern route via Iran, Turkey and the Balkans. Similarly, methamphetamine flows, which before the conflict passed through Ukraine to Russia, may shift to routes through Czechia, Slovakia and the Baltic states. Other areas around the Black Sea and beyond – with, as mentioned, Romania (Constanza), Bulgaria, Italy (Genoa) and France (Marseille) as potential avenues – may also see an uptick due to displaced flows, as may the River Danube, which offers a direct route into the heart of Europe.<sup>175</sup>

At the local level, a frozen conflict will mean more hardship for the citizens of Ukraine. Towns left devastated by fighting and lacking infrastructure and services, together with their desperate populations struggling for employment and essentials, will become magnets for criminal opportunists. This may also enable criminal actors to cement their positions within and influence over governance structures, and become essential to the running of administrative units, as was the case in the LDNR between 2014 and 2022.

Higher-level corrupt actors will also become more powerful as reconstruction funds start to flow through regional and local administrations.

Despite this uncertainty, it is important that research into and policy debate on organized crime continues. Below we identify three focus areas that may help bolster the national and international response to organized crime in the short term: maintaining transparency and accountability; multilateral law enforcement cooperation; and targeted risk assessments of conflict-driven vulnerabilities.

## Maintaining transparency and accountability

The war has imposed extraordinary strictures on the ordinary business of governance, and the political machine has had to adapt to support the Ukrainian armed forces. Several of these changes have greatly increased the power of the state while reducing transparency and accountability. The early days of the war saw the temporary suspension of the ProZorro procurement system in favour of direct contracts and the blocking of public access to several state registries,<sup>176</sup> several of which remained restricted.<sup>177</sup> NABU has cited challenges caused by the conflict, including a 'lack of access to the Unified Register of Pretrial Investigations and the Unified Judicial Information and Telecommunication System', and the impossibility of fulfilling the legal requirements behind bringing a case to court within the stipulated time limits.<sup>178</sup> Journalists have also struggled to access information about the running of the state (particularly state and military expenditures), greatly hindering independent investigation and the information available for public debate.<sup>179</sup> Restoring access to these registries and scrutinizing the closed-door decisions that have taken place during wartime will be essential work in the post-conflict period in order to map any irregular activity.

Transparency and accountability measures must also be updated to take account of new risks stemming from the conflict. June 2022 saw a landmark achievement in the



A reporter at a bomb site. Ukrainian and international journalists have been critical to covering the war, corruption and the risks of future reconstruction. © Alex Chan/SOPA Images/LightRocket via Getty Images



adoption of Ukraine's anti-corruption strategy, which will shape policy up till 2025. However, this strategy is already out of date: it was due to come into effect in 2021 and was only adopted due to the EU accession agenda, having been stymied in parliament for two years.<sup>180</sup> While containing many pertinent measures that must be implemented, the text makes no mention of the conflict in 2022.<sup>181</sup> (At the time of writing, the government had failed to approve the State Anti-Corruption Program – which could have shaped the implementation of the anti-corruption strategy to factor in conflict-related risks – by the 10 January 2023 deadline.)<sup>182</sup> There is therefore an urgent need to establish rigorous and independent oversight, transparency and accountability mechanisms as reconstruction begins in earnest.

Some major steps have already been taken, such as the RISE Ukraine coalition of Ukrainian organizations and international partners in July 2022,<sup>183</sup> and the G7's intention to develop a platform to coordinate donor aid,<sup>184</sup> but more must be done. Indeed, maintaining the anti-corruption architecture that civil society helped create after the Maidan Revolution may bring the biggest gains, but there are troubling signs of erosion. The ProZorro system, which reportedly saved Ukraine over US\$7 billion before the war by enabling increased transparency and online auctions, was, as mentioned above, temporarily suspended in the early stages of the conflict, but there were hopes that it could be made to work within the new strictures. In May, the CEO of ProZorro, Vasyl Zadvornyi, outlined how the platform might be adapted to balance the urgency of reconstruction with transparency and oversight, as well as selecting suppliers according to non-price criteria, such as a commitment to new jobs or green technology.<sup>185</sup> But in January 2023, the government cancelled all auctions on ProZorro until the end of the war over concerns that power blackouts might be hindering bidders' access to the system.<sup>186</sup> While this may indeed be motivated by concerns over equal opportunity, there are fears that such a move will increase corruption and may elide from a temporary measure into a permanent one.

This example points to a larger risk: that of conflict-driven initiatives changing the very nature of how the state functions. According to our fieldwork,

the Office of the President has become an increasingly influential political actor since the Russian invasion: sources speak of a tendency to monopolize decision-making processes and control of financial flows in the country.<sup>187</sup> Concern has been raised that the state's increased powers of asset seizure during the conflict could be used to silence dissenting voices within Ukraine, as well as increasing opportunities for corrupt self-enrichment.<sup>188</sup> In March, Kyiv adopted Law 2116-IX, which authorized the expropriation of Russian and Belarusian assets in Ukraine (collectively valued at US\$1.21 billion, as of October 2022),<sup>189</sup> to be transferred to special state-owned enterprises (with attendant risks of corruption).<sup>190</sup> These powers were expanded by Law 2257-IX (passed in May), which authorized the expropriation of assets of anyone judged (in the state's opinion) to support Russia's aggression.<sup>191</sup>

Russia's trajectory two decades ago points to the risks this kind of centralization poses to society, and it would be a tragic irony if Ukraine were to follow the political course of its antagonist. As such, measures should be taken to ensure that the consolidation of decision-making in wartime is balanced by the ideals of plurality and accountability that are fundamental to the democratic process, good governance and the rule of law.

Bolstering efforts against perceptions of undemocratic tendencies and corruption more generally will also serve a much larger purpose. At present, Ukraine is fighting for its existence, with hundreds of thousands of people engaged in the lethal struggle and many millions more exposed to the dangers and hardships of war. When the conflict ends, Ukraine's citizens will expect a better country for their sacrifice, but if they perceive that the war has merely fuelled corruption and strengthened criminal actors, then the sense of betrayal will be profound. According to law enforcement sources, some soldiers already harbour a sense of betrayal over what they perceive as a corrupt government that has enriched itself during the war.<sup>192</sup> Should this situation come to pass, then organized crime will win twice at its own game: first through self-enrichment during the war (creating civic disaffection), then capitalizing on the sense of disenfranchisement in the post-war period. In the fight for Ukraine's national identity, then, transparency and accountability may be as important as missiles and artillery.

## Multilateral law enforcement cooperation

The increase in criminal activity in the west of Ukraine and across Ukraine's borders with Poland, Hungary, Slovakia, Romania and Moldova is a cause for concern. To counter this, it is essential that border and other law enforcement agencies from these countries share information and coordinate their responses, making use of tools such as INTERPOL's Illicit Arms Records and tracing Management System (iARMS), and developing new ones as required.<sup>193</sup> Regional security against organized crime will be a shared responsibility, for if one avenue is disrupted, illicit flows will simply shift to other less-monitored routes.

Another challenge in law enforcement terms is the relationship between Ukraine and Russia. Bilateral cooperation over crime has been fraught since 2014 and ended after the Russian invasion. Shortly after the beginning of the war, Ukraine disconnected from INTERPOL's network due to fear of Russian misuse of INTERPOL channels; in March, INTERPOL also decreed that the Russian National Central Bureau could no longer send diffusions directly, but would instead need to be vetted by the General Secretariat along with red notices.<sup>194</sup>

Other challenges in law enforcement cooperation include the inevitable dislocations caused by the war (such as countries unwilling to put officers into Kyiv, liaisons ending up in the military or working the counter-intel beat instead), although this impact is likely to be temporary. There is also some caution about the SBU and Ukrainian police, especially relating to corruption, which a number of Western partners feel and which hinders some intel sharing. This still needs work from both sides to move beyond the ringing declarations of mutual cooperation and into real operational work.

A fragmented law enforcement response will be the criminal's best friend, and investigations into transnational organized crime, including child online sexual exploitation – have already suffered.<sup>195</sup> For obvious reasons, trust between Russian and Ukrainian agencies will be non-existent, and this division will be exploited by organized crime, especially in the event the conflict enters a protracted period of reduced

volatility. Indeed, the politicization of law enforcement represents one of the most trenchant challenges to a response. INTERPOL's management of political pressure from various sides while attempting to remain true to its charter will therefore be central. Without communication and coordination, the criminal ecosystem that flourished before the war will emerge much stronger.

Fundamental to improving this situation will be the reform of Ukraine's numerous law enforcement agencies, which are rife with in-fighting and competition. Many agencies are still not at full staff strength, and leadership remains a continuing challenge, with the permanent posts of head of NABU and SAPO remaining unfilled at various points in 2022 (both of which are essential for Ukraine's EU accession aspirations). Before the appointment of Oleksandr Klymenko in July 2022, the SAPO leadership post had remained unfilled since mid-2020, while as of December 2022 NABU was still being run by an acting director, some eight months after the departure of its last permanent director.<sup>196</sup>

Reform of intelligence agencies should also be prioritized, although this too presents many challenges, not least the creation of temporary capacity gaps that could be exploited by criminal and state actors.<sup>197</sup> In some sense, this is a question of re-igniting processes that were interrupted by the war. For example, reform of the SBU – which many observers felt was still too close to its KGB predecessor in remit and culture – was a particular priority being pressed on Kyiv by the EU before the Russian invasion. The European Union Advisory Mission was lobbying on this, and there was a lively debate about options, including separating the agency's law enforcement and counter-intelligence roles. However, with the invasion, the Mission initially evacuated from Kyiv, and although it is still active, it is largely preoccupied with channelling practical aid to the SBU and other agencies. Meanwhile, the debate about the SBU's future has largely disappeared, and the agency itself is using its successes against Russian agents and infiltrators as the basis for a political campaign against any substantive post-war reform.



## Assessing conflict-driven vulnerabilities

As this report has highlighted, there are several conflict-driven vulnerabilities that are or may be exploited by organized crime, and these will benefit from closer scrutiny and specific responses. The various reports that have emerged over weapons leakages in certain units of the International Legion, for example, point to a potential arms trafficking vulnerability that should be examined (the GI-TOC will produce a report on arms flows and options for improving arms controls in 2023). In the cities most damaged by conflict-related damage and deprivation, attention should be focused on the activities of corrupt actors and criminal groups.

The risk of human trafficking both within and outside Ukraine remains stark, but preventive efforts to reduce vulnerability will yield results. In this sense, ascertaining the most vulnerable populations and individuals, and ensuring they have access to sufficient help will reduce the chances of their falling into the clutches of traffickers, and the extensive network of anti-trafficking civil society coalitions that existed before the conflict can be reactivated to identify and support potential victims of trafficking.

Given Ukraine's role as a transit, destination and source country for a variety of narcotics, mapping the impact on the conflict on drug flows and consumption will be important, especially given the trend in soldiers using drugs. Reconstruction of Ukraine should include drug policy reform to build upon Ukraine's initial steps in providing better treatment and care for people who use drugs.<sup>198</sup> A broader programme should also be

developed to help Ukraine's soldiers cope with the trauma of conflict and reintegrate into society, both of which will help reduce criminalization risks in the post-conflict period. Psychological support for soldiers should start now, with Ukrainian psychologists sent to the West for training as soon as possible.

Finally, there must be a focus on corruption, both in terms of its corrosive effect on the state in general (and reconstruction in particular), and given its role as a facilitator and force multiplier of organized crime. Corruption risks will vary according to the locality, administrative unit and disposition of the actors involved, but common vulnerabilities and lessons will apply.

This is an evolving situation and an ongoing conflict, and the ability to take measures will be constrained by the exigencies of war. However, properly mapping and assessing the criminal economy is essential if organized crime is to be cut out of Ukraine's political economy. Reconstruction efforts, including legal and institutional reforms, will need to balance macro socio-economic concerns with granular, location-specific imperatives. To inform these efforts, the GI-TOC Observatory of Illicit Markets and the Ukraine Conflict will be releasing both thematic reports and assessments of the political economy of different regions and neighbouring countries.

Conflicts cast dark shadows. Bringing organized crime out of that shadow and into the light will be the best way to counter it.

Photo: GI-TOC

## NOTES

- 1 According to the GI-TOC Global Organized Crime Index 2021, Russia and Ukraine ranked first and third, respectively, for criminality in Europe (and 32<sup>nd</sup> and 34<sup>th</sup> globally).
- 2 According to GI-TOC fieldwork, the front line has been briefly porous in some areas (notable the front line near Kharkiv), as front line soldiers from both sides became familiar with one another and allowed people to cross, which may have enabled small-scale smuggling. But in the main, the fighting has been too intense and the battlefield too dynamic for smuggling.
- 3 GI-TOC interviews with law enforcement sources, Kyiv, October 2022, and Dnipro and Odesa, December 2022.
- 4 See general prosecutor's office, Про результати боротьби з організованими групами та злочинними організаціями, <https://gp.gov.ua/ua/posts/pro-rezultati-borotbi-z-organizovanimi-grupami-ta-zlochinnimi-organizaciyami-2>.
- 5 See Mark Galeotti and Anna Arutunyan, Rebellion as racket: Crime and the Donbas conflict, GI-TOC, July 2022, <https://globalinitiative.net/analysis/donbas-conflict-crime/>.
- 6 Anna Babinets and Elena Loginova, The Odesa mafia's secret flats in London, OCCRP, 23 April 2018, <https://www.occrp.org/en/paradisepapers/the-odessa-mafias-secret-flats-in-london>.
- 7 In March 2022, for example, the ATB supermarket chain in Ukraine was forced to clarify that its sale of Polish canned goods – which had been reported as misappropriated humanitarian aid due to the cans' white labels and Polish-language product description – was due to the exigencies of importing foodstuffs under martial law. See ATB statement, Facebook, 27 March 2022, <https://www.facebook.com/ATB.Market.tm/posts/5068660573231516/>.
- 8 Phil Williams and John Picarelli, Organized crime in Ukraine: Challenge and response, in *The Prediction and Control of Organized Crime: The Experience of Post-Soviet Ukraine*, eds James O. Finckenauer and Jennifer L. Schrock. Transaction Publishers: New Brunswick, New Jersey, 2004. p 134.
- 9 'Corporate raiding' has been defined as 'the illegal or improper transfer of valuable assets, or substantially all of the value generated from those assets, generally involving some improper coercive role of state authorities'. See Matthew Rojansky, Corporate raiding in Ukraine, <https://www.usubc.org/files/Rojansky%20IREX%20EPS%20Raiding%20and%20Property%20Rights%20Brief.pdf>.
- 10 Phil Williams and John Picarelli, Organized crime in Ukraine: Challenge and response, in *The Prediction and Control of Organized Crime: The Experience of Post-Soviet Ukraine*, eds James O. Finckenauer and Jennifer L. Schrock. Transaction Publishers: New Brunswick, New Jersey, 2004; FATF/GAFI, Financial Action Task Force on Money Laundering, Annual report 2001–2002, p 16, <https://www.fatf-gafi.org/media/fatf/documents/reports/2001%202002%20ENG.pdf>.
- 11 Guy Faulconbridge, Anna Dabrowska and Stephen Grey, Toppled 'mafia' president cost Ukraine up to \$100 billion, prosecutor says, Reuters, 30 April 2014, <https://www.reuters.com/article/us-ukraine-crisis-yanukovich-idUSBREA3TOK820140430>.
- 12 Jemima Kelly, Amber growth turns red as oversupply knocks value, *Financial Times*, 30 May 2019, <https://www.ft.com/content/5217f05a-5f8d-11e9-9300-0becfc937c37>; Linton Besser, Ukraine's illegal amber mining boom is scarring the earth and making criminal gangs rich, ABC News, 21 January 2020, <https://www.abc.net.au/news/2020-01-21/illegal-amber-mining-creating-environmental-disaster-in-ukraine/11745470>.
- 13 A 2018 report by EarthSight claimed that corrupt state-owned forestry enterprises were illegally felling wood in Ukraine's state-owned forests in the Carpathian region that was then being used by Swedish furniture giant IKEA. See EarthSight, Flatpäcked Förests: IKEA's illegal timber problem and the flawed green label behind it, <https://www.earthsight.org.uk/flatpackedforests-en>.
- 14 US State Department, 2019 Trafficking in persons report: Ukraine, <https://www.state.gov/reports/2019-trafficking-in-persons-report-2/ukraine/>.



- 15 James O Finckenauer and Jennifer L Schrock, Introduction to *The Prediction and Control of Organized Crime: The Experience of Post-Soviet Ukraine*, eds James O. Finckenauer and Jennifer L. Schrock. Transaction Publishers: New Brunswick, New Jersey, 2004, p 3; Evgeny Rudenko and Eldar Sarakhman, Киев бандитский. Как зарождались ОПГ и кто их возглавлял в лихие 90-е, *Ukrainska Pravda*, 13 March 2020, <https://www.pravda.com.ua/rus/articles/2020/03/13/7243400/>.
- 16 See Alexander N Gorodysky, Ukraine, International money laundering, and the investigation of organized crime, in *The Prediction and Control of Organized Crime: The Experience of Post-Soviet Ukraine*, eds James O. Finckenauer and Jennifer L. Schrock. Transaction Publishers: New Brunswick, New Jersey, 2004, pp 53–54.
- 17 Putin's spokesman denied this, claiming Firtash was 'an independent businessman'. See Stephen Grey et al, Special report – Putin's allies channelled billions to Ukraine oligarch, Reuters, 26 November 2014, <https://www.reuters.com/article/russia-capitalism-gas-special-report-pix-idUSL3N0TF4QD20141126>. As of 2022, Firtash was residing in Vienna, where he had served a brief spell in prison before posting bail in 2014, since when he has successfully resisted attempts by the US to extradite him, claiming the US has a political agenda. See Angelika Gruber, Ukrainian industrialist Firtash released after posting bail, Reuters, 21 March 2014, <https://www.reuters.com/article/us-austria-ukraine-firtash-idUSBREA2K1DF20140321>; Shaun Walker, Caught between Russia and the US? The curious case of Ukraine's Dmytro Firtash, *The Guardian*, 23 January 2016, <https://www.theguardian.com/world/2016/jan/23/dmytro-firtash-ukraine-oligarch-exile-caught-between-russia-us>.
- 18 Pekka Sutela, The underachiever: Ukraine's economy since 1991, Carnegie Endowment for International Peace, 9 March 2012, <https://carnegieendowment.org/2012/03/09/underachiever-ukraine-s-economy-since-1991-pub-47451>.
- 19 Evgeny Rudenko and Eldar Sarakhman, Киев бандитский. Как зарождались ОПГ и кто их возглавлял в лихие 90-е, *Ukrainska Pravda*, 13 March 2020, <https://www.pravda.com.ua/rus/articles/2020/03/13/7243400/>; see also Бандитский Киев: семь криминальных авторитетов 90-х, Storyboom!, 19 November 2020, <https://translate.google.co.uk/?sl=ru&tl=en&text=Опубликовано%2019%20ноября%2C%202020&op=translate>.
- 20 Phil Williams and John Picarelli, Organized crime in Ukraine: Challenge and response, in *The Prediction and Control of Organized Crime: The Experience of Post-Soviet Ukraine*, eds James O. Finckenauer and Jennifer L. Schrock. Transaction Publishers: New Brunswick, New Jersey, 2004, p 134.
- 21 Mark Galeotti, Commentary: Crime and Crimea – Criminals as allies and agents, Radio Free Europe/Radio Liberty, 3 November 2014, <https://www.rferl.org/a/crimea-crime-criminals-as-agents-allies/26671923.html>.
- 22 Richard Balmforth, Where did Ukraine's Yushchenko go wrong?, Reuters, 11 January 2010, <https://www.reuters.com/article/ukraine-election-yushchenko-idUSLDE60102920100111>.
- 23 Taras Kuzio, Crime and politics in Crimea, OpenDemocracy, 14 March 2014, <https://www.opendemocracy.net/en/odr/crime-and-politics-in-crimea-aksyonov-goblin-wikileaks-cables/>.
- 24 Mark Galeotti, Ukraine's mob war, Foreign Policy, 1 May 2014, <https://foreignpolicy.com/2014/05/01/ukraines-mob-war/>.
- 25 See <https://www.ojp.gov/pdffiles1/nij/grants/198321.pdf>.
- 26 Mark Galeotti, The Crimea: A new free-crime economic zone?, GI-TOC, 2 April 2014, <https://globalinitiative.net/analysis/crimea/>.
- 27 Taras Kuzio, Review: Mark Galeotti's *The Vory: Russia's Super Mafia*, Europe-Asia Studies, 71, 2 (March 2019), 329–331, <https://web.s.ebscohost.com/ehost/detail/detail?vid=2&sid=d72bf4eb-2da1-46a3-8c01-8ab-47123c726%40redis&bdata=JnNpdGU9ZWVhc3Qtb-Gl2ZQ%3d%3d#AN=135461303&db=bth>.
- 28 This discussion of the LDNR is adapted from Mark Galeotti and Anna Arutunyan, Rebellion as racket: Crime and the Donbas conflict, GI-TOC, July 2022, <https://globalinitiative.net/analysis/donbas-conflict-crime/>.
- 29 In 2016, coal represented 75% of exports from the LDNR to the government-held Ukraine, while the largest single import was iron ore, but lack of legal status for the LDNR meant businesses had little choice but to conduct their affairs through illegal or semi-legal channels, especially after the economic blockade imposed by Kyiv in February 2017 effectively cut off all legal markets for coal and steel mined and produced in rebel-held areas. See Ion Marandici and Alexandru Leşanu, The political economy of the post-Soviet de facto states: A paired comparison of Transnistria and the Donetsk People's Republic, *Problems of Post-Communism*, 2020.
- 30 According to KPMG, in 2016, 5.8 billion cigarettes were smuggled from and through the LDNR (including ones originating in Russia and Belarus), falling to 4.2 billion in 2018 and just 2.4 billion by 2019. The main reason for the decline appears to be more effective interdiction of the smuggling routes, as well as greater market awareness in Europe. See KPMG, Illicit cigarette consumption in the EU, UK, Norway and Switzerland, 2020, <https://www.stopillegal.com/docs/>

- default-source/external-docs/kpmg-report---2019-results/kpmg-report-illicit-cigarette-consumption-in-the-eu-uk-norway-and-switzerland-2019-results.pdf.
- 31 Kiev, Separatists fret at gun law in Ukraine's rebel regions, NDTV, 2 July 2014, <https://www.ndtv.com/world-news/kyiv-separatists-fret-at-gun-law-in-ukraines-rebel-regions-583051>.
  - 32 According to the General Prosecutor's Office, in the first year of fighting to June 2015 alone, the number of gun-related crimes rose by 231%. Gun crime surges in Ukraine, *Kyiv Post*, 23 July 2015, <https://www.kyivpost.com/article/content/ukraine-politics/gun-crime-surges-in-ukraine-394170.html>. Незаконний оборот зброї виріс в два рази: зафіксовано 119 фактів продажу, *Sudebno-yuridicheskaya Gazeta*, 20 October 2018, <https://sud.ua/ru/news/ukraine/127326-nezakonnny-oborot-oruzhiya-vyros-v-dva-raza-zafiksirovano-119-faktov-prodazhi>.
  - 33 In 2016, Poland recorded a 2 000% rise in seizures of weapons that had originated in south-eastern Ukraine. See Tom Porter, Poland: Weapon smuggling following Ukraine war arming organised crime and terrorists in western Europe, *International Business Times*, 6 June 2016, <https://www.ibtimes.co.uk/poland-weapon-smuggling-following-ukraine-war-arming-organised-crime-terrorists-western-europe-1533683>.
  - 34 By 2019, the International Organization for Migration claimed that of the 49 000 Ukrainians – from both sides of the line of contact – who had been trafficked into modern slavery over the previous three years, 65% were in Russia. IOM: Some 49,000 Ukrainians victims of human trafficking over past three years, UNIAN, 2 December 2019, <https://www.unian.info/society/10777085-iom-some-49-000-ukrainians-victims-of-human-trafficking-over-past-three-years.html>.
  - 35 Mark Galeotti and Anna Arutunyan, Rebellion as racket: Crime and the Donbas conflict, GI-TOC, July 2022, <https://globalinitiative.net/analysis/donbas-conflict-crime/>.
  - 36 Steven Pifer, Ukraine: Six years after the Maidan, Brookings Institute, 21 February 2020, <https://www.brookings.edu/blog/order-from-chaos/2020/02/21/ukraine-six-years-after-the-maidan/>; National Anti-Corruption Bureau, History of NABU, <https://nabu.gov.ua/en/history-nabu>; Anti-corruption reforms in Ukraine: 4th round of monitoring of the Istanbul Anti-Corruption Action Plan, OECD, 2017, <https://www.oecd.org/corruption/acn/OECD-ACN-4th-Round-Report-Ukraine-ENG.pdf>.
  - 37 Olena Goncharova. Ukrainian top officials' wealth exposed in e-declarations, *Kyiv Post*, 20 October 2016, <https://www.kyivpost.com/ukraine-politics/ukrainian-top-officials-wealth-exposed-e-declarations.html>.
  - 38 Richard L Cassin, Reassessing Ukraine's 'failed' anti-corruption reforms, *The FCPA Blog*, 7 March 2022, <https://fcpablog.com/2022/03/07/reassessing-ukraines-failed-anti-corruption-reforms/>.
  - 39 Nick Fenton, Corruption and private sector investment in Ukraine's reconstruction, Center for Strategic and International Studies, 8 November 2022, <https://www.csis.org/analysis/corruption-and-private-sector-investment-ukraines-reconstruction>.
  - 40 Anna Myroniuk and Thaisa Semenova, Ukraine reacts to Pandora Papers investigation, *Kyiv Post*, 4 October 2021, <https://www.kyivpost.com/ukraine-politics/reactions-in-ukraine-to-pandora-papers-revelations.html>.
  - 41 Cabinet of the Ministers of Ukraine, Про схвалення Стратегії боротьби з організованою злочинністю, 16 September 2020, <https://zakon.rada.gov.ua/laws/show/1126-2020-p#n8>.
  - 42 It was later revealed that 108 people had been sanctioned 'by mistake'. Office of the President of Ukraine, Address by the President of Ukraine following the meeting of the National Security and Defense Council of May 14, 14 May 2021, <https://www.president.gov.ua/en/news/zvernennya-prezidenta-ukrayini-za-rezultatami-zasidannya-rad-68457>; Natalia Datskevych, Security Council sanctions 108 people 'by mistake,' sparks backlash, *Kyiv Post*, 17 October 2021, <https://www.kyivpost.com/ukraine-politics/security-council-sanctions-108-people-by-mistake-sparks-backlash.html>.
  - 43 Josh Rudolph and Norman Eisen, Ukrainian recovery funding must be tied to anti-corruption, Alliance for Securing Democracy, 24 October 2022, <https://securingdemocracy.gmfus.org/marshall-plan-ukraine-recovery-anti-corruption/>.
  - 44 Office of the President of Ukraine, President immediately signed the anti-oligarchic law passed by the Verkhovna Rada, 5 November 2021, <https://www.president.gov.ua/en/news/prezident-nevidkladno-pidpisav-uhvalenij-verhovnoyu-radoyu-a-71445>; Anastasia Radina, Ukraine strengthens independence of key anti-corruption agency, Atlantic Council, 21 October 2021, <https://www.atlanticcouncil.org/blogs/ukrainealert/ukraine-strengthens-independence-of-key-anti-corruption-agency/>; Zelensky signs law on bringing NABU status in line with Constitution, Interfax-Ukraine, 8 November 2021, <https://en.interfax.com.ua/news/general/778333.html>.
  - 45 Andrew Wilson, Faltering fightback: Zelensky's piecemeal campaign against Ukraine's oligarchs, European Council on Foreign Relations, 6 July 2021, <https://ecfr.eu/publication/faltering-fightback-zelenskys-piecemeal-campaign-against-ukraines-oligarchs/>.
  - 46 See, for example, Brian Mefford, Ukraine fails vaccine test, Atlantic Council, 6 April 2021, <https://www.atlanticcouncil.org/blogs/ukrainealert/ukraine-fails-vaccine-test/>.



- 47 Interview with underworld source, Odesa, May 2022.
- 48 Interviews with underworld source in Germany, May 2022, law enforcement source in Kyiv, May 2022 and law enforcement source in Kyiv, December 2022.
- 49 Interviews with underworld sources in Germany and Lviv, May 2022.
- 50 In November, a member of a transnational organized crime group from the South Caucasus was arrested, allegedly intending to set up his own criminal group in the west of Ukraine focused on violent robbery. See SBU, СБУ затримала у Тернополі іноземного злочинця, якого шукає Інтерпол, і який намагався створити кримінальне угруповання в Україні, Telegram channel, 18 November 2022, <https://t.me/SBUkr/5810>.
- 51 Interview with a journalist, Kyiv, December 2022.
- 52 It was not possible to verify this claim, and it is unlikely that such a complete sweep of Russian actors was achieved. Interviews with law enforcement sources, Kyiv, May and December 2022.
- 53 Jacques Follorou, Ukraine's clandestine war to neutralize the pro-Russian mafia, *Le Monde*, 9 December 2022, [https://www.lemonde.fr/en/international/article/2022/12/09/ukraine-s-clandestine-war-to-neutralize-the-pro-russian-mafia\\_6007085\\_4.html](https://www.lemonde.fr/en/international/article/2022/12/09/ukraine-s-clandestine-war-to-neutralize-the-pro-russian-mafia_6007085_4.html).
- 54 Having run the so-called people's republics along criminal lines (with Moscow's permission) since 2014, the leaders of the LDNR saw their relationship with Moscow change dramatically in September 2022 when Russia formally annexed the LDNR. This is likely to reduce the space for high-level organized crime in the medium term as LDNR officials are supplanted by those from Russia – a process that was already under way in June. The smuggling economies into non-occupied Ukraine that underpinned the LDNR were also shattered by the Russian invasion, further undermining the economic base of the separatist leadership. See Russian officials take office in separatist eastern Ukraine, *Moscow Times*, 9 June 2022, <https://www.themoscowtimes.com/2022/06/09/russian-officials-take-office-in-separatist-eastern-ukraine-a77944>.
- 55 Interviews with journalist, Kyiv, December 2022, and law enforcement source in Odesa, December 2022.
- 56 Jacques Follorou, Ukraine's clandestine war to neutralize the pro-Russian mafia, *Le Monde*, 9 December 2022, [https://www.lemonde.fr/en/international/article/2022/12/09/ukraine-s-clandestine-war-to-neutralize-the-pro-russian-mafia\\_6007085\\_4.html](https://www.lemonde.fr/en/international/article/2022/12/09/ukraine-s-clandestine-war-to-neutralize-the-pro-russian-mafia_6007085_4.html).
- 57 Documents shown to GI-TOC by underworld source in Odesa, May 2022.
- 58 A desire to push back against Russian aggression was cited by one Finnish criminal as a motive for travelling to Ukraine to fight. See Julie Ebbe, *Undre världens män har sökt sig från Finland till kriget i Ukraina*, Svenska Yle, 25 March 2022, <https://svenska.yle.fi/a/7-10014654>.
- 59 The Legion was formed almost overnight when thousands of foreign volunteers came to Ukraine after President Zelensky's 27 February call. Office of the President of Ukraine, Звернення до громадян іноземних держав, які прагнуть допомогти Україні у її боротьбі проти російської агресії, 27 February 2022, <https://www.president.gov.ua/news/zvernennya-do-gromadyan-inozemnih-derzhav-yaki-pragnut-dopom-73213>.
- 60 Anna Myroniuk and Alexander Khrebet, Investigation: International Legion soldiers allege light weapons misappropriation, abuse by commanders, *Kyiv Independent*, 30 November 2022, <https://kyivindependent.com/investigations/investigation-international-legion-misappropriation>.
- 61 Mark Galeotti, Gangster's paradise: How organised crime took over Russia, *The Guardian*, 23 March 2018, <https://www.theguardian.com/news/2018/mar/23/how-organised-crime-took-over-russia-vory-super-mafia>.
- 62 In the context of Ukraine before the Russian invasion, see the efforts made by Blackwater founder Erik Prince in Ukraine before the conflict: Simon Shuster, Exclusive: Documents reveal Erik Prince's \$10 billion plan to make weapons and create a private army in Ukraine, *Time*, 7 July 2021, <https://time.com/6076035/erik-prince-ukraine-private-army/>.
- 63 Alla Hurska, Making sense of the 'Semenchenko's PMC' affair, *Eurasia Daily Monitor*, 18, 71, <https://jamestown.org/program/making-sense-of-the-semenchenkos-pmc-affair/>.
- 64 See Julia Stanyard, Thierry Vircoulon and Julian Rademeyer, The grey zone: Russia's military, mercenary and criminal engagement in Africa, GI-TOC, February 2023, <https://globalinitiative.net/analysis/russia-in-africa/>.
- 65 Tomas Hirst, Meet the 'pocket army' funded by sacked Ukrainian billionaire Igor Kolomoisky, *Business Insider*, 28 March 2015, <https://www.businessinsider.com/meet-the-pocket-army-funded-by-sacked-ukrainian-billionaire-igor-kolomoisky-2015-3?r=US&IR=T>.
- 66 Володимир Ланда, Порошенко та Гереги втратили статус мільярдерів. А що зі статками Ахметова та Пінчука? Forbes оновив рейтинг з початку війни, *Forbes*, 14 March 2022, <https://forbes.ua/inside/poroshenko-vtrativ-status-milyardera-a-shcho-zi-statkami-akhmetova-pinchuka-ta-zasnovnikiv-gram-marly-forbes-onoviv-reyting-z-pochatku-viyni-14032-022-4605>.
- 67 Mykhailo Minakov, Ukraine's wartime politics takes a new turn, Wilson Center, 19 July 2022, <https://www.wilsoncenter.org/blog-post/ukraines-wartime-politics-takes-new-turn>.

- 68 Valentyna Romanenko, Members of National Guard of Ukraine, police officers, border guards, security serviceman exchanged for Medvedchuk, *Ukrainska Pravda*, 22 September 2022, <https://www.pravda.com.ua/eng/news/2022/09/22/7368588/>.
- 69 See Konstantin Skorkin, Ukraine's oligarchs are a dying breed: The country will never be the same, Carnegie Endowment for International Peace, 14 September 2022, <https://carnegieendowment.org/politika/87914>; and Mykhailo Minakov, The war and the future of Ukraine's oligarchy, Wilson Center, 3 August 2022, <https://www.wilsoncenter.org/blog-post/war-and-future-ukraines-oligarchy>.
- 70 The conflict in Ukraine and its impact on organized crime and security, UNICRI, November 2022, p 40, [https://unicri.it/sites/default/files/2022-11/The%20conflict%20in%20Ukraine%20and%20its%20impact%20on%20organized%20crime%20and%20security\\_0.pdf](https://unicri.it/sites/default/files/2022-11/The%20conflict%20in%20Ukraine%20and%20its%20impact%20on%20organized%20crime%20and%20security_0.pdf).
- 71 Encounter during fieldwork in Bakhmut, November 2022.
- 72 У будь-який час і в будь-якому місці. Військових перевірятимуть на алкоголь і наркотики за новими правилами в Україні, NV, 15 December 2022, [https://nv.ua.translate.goog/ukr/ukraine/events/perevirka-viyskovih-na-alkogol-i-narkotiki-de-i-kogo-budut-per-eviryati-zakonoproekt-8271-50289775.html?\\_x\\_tr\\_sl=uk&\\_x\\_tr\\_tl=en&\\_x\\_tr\\_hl=en&\\_x\\_tr\\_pto=sc](https://nv.ua.translate.goog/ukr/ukraine/events/perevirka-viyskovih-na-alkogol-i-narkotiki-de-i-kogo-budut-per-eviryati-zakonoproekt-8271-50289775.html?_x_tr_sl=uk&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=sc).
- 73 Though it should be noted that in Ukraine this will be on an individual, ad hoc basis; despite Russian claims, there is no evidence that drugs are being used by the state to systematically bolster fighting capacity. Cheryl Teh, Russian lawmakers baselessly claim their army is up against biologically modified Ukrainian super soldiers, *Business Insider*, 20 July 2022, <https://www.businessinsider.com/russian-lawmakers-tout-baseless-claims-ukrainian-super-soldiers-2022-7?r=US&IR=T>.
- 74 Government approves UAH 100,000 in salaries for military on the frontline, *Ukrinform*, 28 February 2022, <https://www.ukrinform.net/rubric-ato/3416086-government-approves-uah-100000-in-salaries-for-military-on-the-frontline.html>; Середньомісячна заробітна плата за видами економічної діяльності за період з початку року, [https://ukrstat.gov.ua/operativ/operativ2005/gdn/Zarp\\_ek\\_p/Zp\\_ek\\_p\\_u/arh\\_zpp\\_u.htm](https://ukrstat.gov.ua/operativ/operativ2005/gdn/Zarp_ek_p/Zp_ek_p_u/arh_zpp_u.htm).
- 75 European Monitoring Centre for Drugs and Drug Addiction, Ukraine country overview, [https://www.emcdda.europa.eu/countries/ukraine\\_en](https://www.emcdda.europa.eu/countries/ukraine_en).
- 76 UNODC, World Drug Report 2022, 4: Drug market trends: cocaine, amphetamine-type stimulants, new psychoactive substances, June 2022, p 101, [https://www.unodc.org/res/wdr2022/MS/WDR22\\_Booklet\\_4.pdf](https://www.unodc.org/res/wdr2022/MS/WDR22_Booklet_4.pdf).
- 77 UNODC, Conflict in Ukraine: Key evidence of drug demand and supply, April 2022, p 6.
- 78 Interviews with drug user and drug dealer in Kyiv, May 2022, and underworld source in Odesa, May 2022.
- 79 Niko Vorobyov, War deepens suffering for Ukraine's drug users, *Al Jazeera*, 16 March 2022, <https://www.aljazeera.com/news/2022/3/16/war-deepens-suffering-for-ukraines-drug-users>.
- 80 Офіс Генерального прокурора, Правоохоронці викрили нарколабораторію та склад з «продукцією» на 10 млн грн і арсеналом зброї, *Telegram*, 25 August 2022, [https://t.me/pgov\\_ua/5376](https://t.me/pgov_ua/5376); Ukraine State Bureau of Investigation, The territory of sales – the whole country: the SBI exposed and stopped the large-scale amphetamine production in Bukovyna, 29 September 2022, <https://dbr.gov.ua/en/news/teritoriya-zbutu-usya-kraina-na-bukovini-dbr-vikrilo-ta-pripinilo-diyalnist-masshtabnogo-virobnictva-amfetaminu>.
- 81 See general prosecutor's office, Про зареєстровані кримінальні правопорушення та результати їх досудового розслідування, <https://gp.gov.ua/ua/posts/pro-zareyestrovani-kriminalni-pravoporushennya-ta-rezultati-yih-dosudovogo-rozsliduvannya-2>.
- 82 European Monitoring Centre for Drugs and Drug Addiction, Overview of drug markets in the European Neighbourhood Policy-East countries, 2022, p 10, [https://www.emcdda.europa.eu/system/files/publications/14948/TD0322107ENN\\_1.pdf](https://www.emcdda.europa.eu/system/files/publications/14948/TD0322107ENN_1.pdf).
- 83 Briefing to the G7 by the INTERPOL deputy executive director, Berlin, September 2022.
- 84 Офіс Генерального прокурора, Правоохоронці викрили нарколабораторію та склад з «продукцією» на 10 млн грн і арсеналом зброї, *Telegram*, 25 August 2022, [https://t.me/pgov\\_ua/5376](https://t.me/pgov_ua/5376).
- 85 Правоохоронці столичного метрополітену ліквідували нарколабораторію з «товаром» на 25 мільйонів гривень, *UA Independent*, 22 November 2022, <https://ua-independent.com/pravookhorontsi-stolychnoho-metropolitenu-likviduvaly-narkolaboratoriiu-z-tovarem-na-25-milioniv-hryven>.
- 86 Ukraine State Bureau of Investigation, The territory of sales – the whole country: the SBI exposed and stopped the large-scale amphetamine production in Bukovyna, 29 September 2022, <https://dbr.gov.ua/en/news/teritoriya-zbutu-usya-kraina-na-bukovini-dbr-vikrilo-ta-pripinilo-diyalnist-masshtabnogo-virobnictva-amfetaminu>.
- 87 Ukraine State Bureau of Investigation, The SBI rigorously counteracts attempts of drug distribution in frontline areas, 22 September 2022, <https://dbr.gov.ua/en/news/dbr-zhorstko-proti-die-sprobam-rozpovsyudzhennya-narkotikiv-v-prifrontovih-rajonah>.
- 88 Interview with law enforcement source, December 2022.



- 89 See Europol, <https://www.europol.europa.eu/media-press/newsroom/news/europol-statement-cooperation-ukraine#:~:text=Regarding%20the%20war%20in%20Ukraine,once%20the%20conflict%20has%20ended>
- 90 Jeff Abramson, West rushes weapons to Ukraine, Arms Control, April 2022, <https://www.armscontrol.org/act/2022-04/news/west-rushes-weapons-ukraine>.
- 91 Lara Jakes and John Ismay, U.S. program aims to keep sensitive weapons in Ukraine, *New York Times*, 27 October 2022, <https://www.nytimes.com/2022/10/27/us/politics/weapons-aid-ukraine-russia.html>.
- 92 See Parliament creates commission to monitor movement of Western weapons in Ukraine, *Kyiv Independent*, 19 July 2022, <https://kyivindependent.com/news-feed/parliament-creates-commission-to-monitor-movement-of-western-weapons-in-ukraine>.
- 93 Lara Jakes and John Ismay, U.S. Program aims to keep sensitive weapons in Ukraine, *New York Times*, 27 October 2022, <https://www.nytimes.com/2022/10/27/us/politics/weapons-aid-ukraine-russia.html>.
- 94 European Commission, Informal Home Affairs Council: EU launches the Support Hub for Internal Security and Border Management in Moldova, 11 July 2022, [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_22\\_4462](https://ec.europa.eu/commission/presscorner/detail/en/IP_22_4462).
- 95 See, for example, Maria Korenyuk, Lucy Swinnen and Jack Goodman, Undercover with Russia's fake arms dealers, BBC, 24 September 2022, <https://www.bbc.co.uk/news/world-62983444>; Russia says West's Ukraine weapons are going onto the black market, Reuters, 20 October 2022, <https://www.reuters.com/world/europe/russia-says-eu-party-conflict-ukraine-2022-10-20/>.
- 96 Back from the front: A British volunteer in Ukraine, Lindybeige channel, YouTube, December 2022, <https://www.youtube.com/watch?v=TCbD4WBqP-g4&t=1666s>; Anna Myroniuk and Alexander Khrebet, Investigation: International Legion soldiers allege light weapons misappropriation, abuse by commanders, *Kyiv Independent*, 30 November 2022, <https://kyivindependent.com/investigations/investigation-international-legion-misappropriation>.
- 97 Interview with a media source, Kyiv, December 2022.
- 98 Alessandra Prentice and Anton Zverev, Ukraine has become a trove for the black market arms trade, *Business Insider*, 25 July 2016, <https://www.businessinsider.com/ukraine-trove-black-market-arms-trade-2016-7?r=US&IR=T>.
- 99 Interview with law enforcement source, Dnipro, December 2022.
- 100 Marco Hernandez and Denise Lu, Can Ukraine break through again?, *New York Times*, 21 September 2022, <https://www.nytimes.com/interactive/2022/09/21/world/europe/ukraine-maps-momentum.html>.
- 101 Thomas Gibbons-Neff and Natalia Yermak, A frontline shadow economy: Ukrainian units swap tanks and artillery, *New York Times*, 30 August 2022, <https://www.nytimes.com/2022/08/30/world/europe/ukrainian-soldiers-weapons-front-line.html?smid=nytcore-ios-share&referringSource=articleShare>.
- 102 State Border Guard Service of Ukraine, Прикордонники ліквідували канал збуту трофейної зброї, 18 November 2022, <https://dpsu.gov.ua/ua/news/prikordonniki-likvidovali-kanal-zbutu-trofeynoi-zbroi/>.
- 103 Elena Rudenko, Became [sic] aware of the condition of the victims of the explosion in Odessa, 4 December 2022, [https://myc.news/en/proishestvie/stalo\\_izvestno\\_o\\_sostoyanii\\_postradavshih\\_ot\\_vzryva\\_v\\_odesse](https://myc.news/en/proishestvie/stalo_izvestno_o_sostoyanii_postradavshih_ot_vzryva_v_odesse).
- 104 See, for example, The SBU detained an arms dealer and discovered a stash of weapons in Zaporizhzhia, *Odessa Journal*, 30 July 2022, <https://odessa-journal.com/the-sbu-detained-an-arms-dealer-and-discovered-a-stash-of-weapons-in-zaporizhzhia/>; Поліція Київщини показала відео затримання підпільного торговця зброєю з Переяслава, Pereiaslav City, 28 October 2022, <https://pereiaslav.city/articles/246432/u-pereyaslavi-zatrimali-torgovcya-zbroeyu-ta-vibuhonebezpechnimi-predmetami-video>.
- 105 James Rothwell et al., 'Glory to Ukraine': Civilians take up weapons in the battle for Kyiv, *The Telegraph*, 25 February 2022, <https://www.telegraph.co.uk/world-news/2022/02/25/glory-ukraine-civilians-given-weapons-battle-kyiv/>.
- 106 Interview with senior law enforcement, Kyiv, October 2022.
- 107 Anton Martyniuk, Measuring illicit arms flows: Ukraine, Small Arms Survey, Briefing Paper, April 2017, p 4–5, <https://www.smallarmssurvey.org/sites/default/files/resources/SAS-BP3-Ukraine.pdf>.
- 108 Kirsi Heikel, KRP:n tiedustelutiedot: Ukrainalle toimitet-  
tuja aseita on päätynyt rikollisille Suomessa, *YLE News*, 30 October 2022, <https://yle.fi/a/3-12668870>.
- 109 National Bureau of Investigation: 'No evidence' that donated weapons have been smuggled from Ukraine to Finland, *Yle News*, 2 November 2022, <https://yle.fi/a/3-12672122>.
- 110 The Observatory of Illicit Markets and the Ukraine Conflict will undertake a detailed assessment of changes to arms flows and the potential for arms control in a forthcoming report.
- 111 See General Prosecutor's Office, Про зареєстровані кримінальні правопорушення та результати їх досудового розслідування, <https://gp.gov.ua/ua/posts/pro-zareyestrovani-kriminalni-pravoporushennya-ta-rezultati-yih-dosudovogo-rozsliduvannya-2>.
- 112 Ukraine president orders general mobilization, *DW*, 25 February 2022, <https://www.dw.com/en/ukraine-president-orders-general-mobilization/a-60908996>.

- 113 NAZK, Departure from Ukraine abroad under martial law: How to eliminate corruption. The NAZK presented the research, 26 October 2022, <https://nazk.gov.ua/en/news/74914/>.
- 114 Interview with conscript, Lviv, October 2022.
- 115 One criminal group arranged for clients to be taken to occupied Crimea and then into Russia via the Kerch Bridge, with the help of a corrupt FSB border guard, before their onward journeys to the South Caucasus and EU. See SSU dismantles criminal group that offered draft evaders to go to Russia, SSU, 19 November 2022, <https://ssu.gov.ua/en/novyny/sbu-zneshkodyla-zlochynne-uhropovannia-yake-proponovalo-ukhyliantam-vyikhaty-do-rosii>.
- 116 Анастасия Ковалева, Незаконно переправляли через границу призывников: в Киеве разоблачена преступная схема, StopCor, 8 December 2022, <https://www.stopcor.org/section-suspilstvo/news-nezakonno-perepravlyali-cherez-kordon-pri-zovnikov-v-kievi-vikrito-zlochinnu-shemu-08-12-2022.html>.
- 117 Ukrainian Office of the Prosecutor General, Незаконний перетин кордону військовозобов'язаними за 12 тис доларів США – трьом особам повідомлено про підозру, 20 October 2022, <https://www.gp.gov.ua/ua/posts/nezakonnii-peretin-kordonu-viiskovozobov'yazani-mi-za-12-tis-dolariv-ssa-tryom-osobam-povidomleno-pro-pidozru>; Волинського лікаря затримали за виготовлення довідок для ухилинтів, Zaxid.net, 13 January 2023, [https://zaxid.net/volinskogo-likarya-zatrimali\\_za\\_vigotovlennya\\_dovidok\\_dlya\\_uhilyantiv\\_n1556055](https://zaxid.net/volinskogo-likarya-zatrimali_za_vigotovlennya_dovidok_dlya_uhilyantiv_n1556055).
- 118 NAZK, Departure from Ukraine abroad under martial law: How to eliminate corruption. The NACP presented the research, 26 October 2022, <https://nazk.gov.ua/en/news/74914/>.
- 119 Running away from Ukraine: How men flee from war, Visit Ukraine, 3 November 2022, <https://visitukraine.today/blog/1109/running-away-from-ukraine-how-men-flee-from-war>.
- 120 MVS, Майже 3,8 тисячі підроблених документів з початку воєнного стану прикордонники виявили в пунктах пропуску, 13 January 2023, <https://mvs.gov.ua/uk/news/maize-38-tisiaci-pidroblenix-dokumntiv-z-pocatku-voennogo-stanu-prikordonniki-viiavili-v-punktax-propusku>.
- 121 Personal communication with a lawyer in London, 16 December 2022.
- 122 NAZK, Departure from Ukraine abroad under martial law: How to eliminate corruption. The NACP presented the research, 26 October 2022, <https://nazk.gov.ua/en/news/74914/>; The Security Service of Ukraine eliminated three more schemes for evaders to flee abroad, Odessa Journal, 10 November 2022, <https://odessa-journal.com/the-security-service-of-ukraine-eliminated-three-more-schemes-for-evaders-to-flee-abroad/>; Running away from Ukraine: How men flee from war, Visit Ukraine, 3 November 2022, <https://visitukraine.today/blog/1109/running-away-from-ukraine-how-men-flee-from-war>.
- 123 Ukrainian Office of the Prosecutor General, Організація незаконного перетину кордону через систему «Шлях» – керівнику благодійного фонду та посереднику повідомлено про підозру, 1 November 2022, <https://www.gp.gov.ua/ua/posts/organizaciya-nezakonnogo-peretinu-kordonu-cerez-sistemu-slyax-kerivniku-blagodiinogo-fondu-ta-poseredniku-pov-idomleno-pro-pidozru>.
- 124 Hardin Land and Nicholas Noe, Op-ed: How can we improve humanitarian aid to Ukrainians? Let them control it, *Los Angeles Times*, 28 August 2022, <https://www.latimes.com/opinion/story/2022-08-28/ukraine-humanitarian-aid-six-months-russia-invasion>.
- 125 Statement by Osnat Lubrani, UN Resident & Humanitarian Coordinator in Ukraine, 'The war has caused the fastest and largest displacement of people in Europe since World War II', UN, 24 March 2022, <https://ukraine.un.org/en/175836-war-has-caused-fastest-and-largest-displacement-people-europe-world-war-ii>.
- 126 OCHA, Ukraine Situation Report, 16 November 2022, <https://reliefweb.int/report/ukraine/ukraine-situation-report-16-nov-2022-enruuk>.
- 127 OCHA, Ukraine Flash Appeal (March to December 2022), 8 August 2022, <https://reporting.unhcr.org/document/3027>.
- 128 Human trafficking was assessed as the second most pervasive market in Ukraine (arms trafficking being the first) in the Global Organized Crime Index 2021. See <https://ocindex.net/country/ukraine> (2021 profile).
- 129 See, for example, the International Organization for Migration, IOM warns of increased risk of trafficking in persons for people fleeing Ukraine, 16 March 2022, <https://www.iom.int/news/iom-warns-increased-risk-trafficking-persons-people-fleeing-ukraine>; Kristy Siegfried, Ukraine crisis creates new trafficking risks, UNHCR, 13 April 2022, <https://www.unhcr.org/uk/news/stories/2022/4/62569be24/ukraine-crisis-creates-new-trafficking-risks.html>.
- 130 Information received from a Ukrainian activist in Washington, D.C., 3 November 2022.
- 131 Lorenzo Tondo, Ukraine prosecutors uncover sex trafficking ring preying on women fleeing country, *The Guardian*, 7 July 2022, <https://www.theguardian.com/global-development/2022/jul/07/ukraine-prosecutors-uncover-sex-trafficking-ring-preying-on-women-fleeing-country>.
- 132 Such practices were already present in Ukraine before the Russian invasion. See, for example, Інна Андаліцька, На Миколаївщині мати знімала своїх маленьких дітей в порно, Unian.ua, 4 February 2022,



- <https://www.unian.ua/incidents/na-mikolajivshchi-ni-mati-znimala-svojih-malenkih-ditey-v-porno-i-prodavala-v-interneti-novini-ukrajina-11693806.html>.
- 133 In Poland, for example, a Ukrainian refugee reported being offered accommodation in return for housework and sex, while another said she had only been paid a fraction of her wages while working for a Polish company as an undocumented cleaner. See Rosie Birchard, Human traffickers exploit desperation of Ukrainian refugees and their children, PBS, 16 November 2022, <https://www.pbs.org/newshour/show/human-traffickers-exploit-desperation-of-ukrainian-refugees-and-their-children>. The UK National Crime Agency also reported that 10 sex offenders had illegally travelled to Poland shortly after the invasion, claiming to be providing 'humanitarian aid'. See Geneva Abdul, Ten UK sex offenders travelled to Poland after Ukraine invasion, says NCA, *The Guardian*, 21 July 2022, <https://www.theguardian.com/world/2022/jul/21/ten-uk-sex-offenders-tried-to-travel-to-poland-after-ukraine-invasion-says-nca>.
- 134 ANSA, Italy: Ukrainian refugees exploited in counterfeit cigarette plant, Infomigrants, 18 April 2022, <https://www.infomigrants.net/en/post/39921/italy-ukrainian-refugees-exploited-in-counterfeit-cigarette-plant>.
- 135 Brian Hutton, Ukrainian refugees targeted by border gangs for sex trade, senior PSNI officer says, *Irish Times*, 26 October 2022, <https://www.irishtimes.com/crime-law/2022/10/26/fifteen-northern-ireland-organised-crime-gangs-have-cross-border-footprint-in-the-republic/>.
- 136 Europol, Human traffickers luring Ukrainian refugees on the web targeted in EU-wide hackathon, 23 June 2022, <https://www.europol.europa.eu/media-press/newsroom/news/human-traffickers-luring-ukrainian-refugees-web-targeted-in-eu-wide-hackathon>.
- 137 Europol, 20 countries spin a web to catch human traffickers during a hackathon, 21 September 2022, <https://www.europol.europa.eu/media-press/newsroom/news/20-countries-spin-web-to-catch-human-traffickers-during-hackathon>.
- 138 Ukraine Office of the General Prosecutor, Вербували жінок для сексуальної експлуатації за кордоном та в Україні – повідомлено про підозру дев'яти особам, Telegram channel, 8 November 2022, [https://t.me/translate.google.gov.ua/7230?\\_x\\_tr\\_sl=uk&\\_x\\_tr\\_tl=en&\\_x\\_tr\\_hl=en&\\_x\\_tr\\_pto=sc](https://t.me/translate.google.gov.ua/7230?_x_tr_sl=uk&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=sc).
- 139 UNHCR, New report analyzes Sweden's temporary protection for people fleeing Ukraine, 29 June 2022, <https://www.unhcr.org/neu/82207-new-report-analyzes-swedens-temporary-protection-for-people-fleeing-ukraine.html>.
- 140 Explained: What problems are Ukrainian refugees facing in Sweden?, *The Local*, 1 November 2022, <https://www.thelocal.se/20221101/explained-what-problems-are-ukrainian-refugees-facing-in-sweden/>.
- 141 James Tapper, Ukrainian refugees in UK face homelessness crisis as councils struggle to find hosts, *The Guardian*, 30 October 2022, <https://www.theguardian.com/world/2022/oct/30/ukrainian-refugees-uk-homelessness-councils-hosts>.
- 142 Hugo Bachega and Merlyn Thomas, Ukraine war refugees asked not to return this winter, BBC, 25 October 2022, <https://www.bbc.co.uk/news/world-europe-63389270>.
- 143 IOM, Ukraine Returns Report, September 2022, p 2, [https://displacement.iom.int/sites/g/files/tmzbd1461/files/reports/IOM\\_UKR%20Returns%20Report\\_R9%20GPS\\_FINAL\\_0.pdf](https://displacement.iom.int/sites/g/files/tmzbd1461/files/reports/IOM_UKR%20Returns%20Report_R9%20GPS_FINAL_0.pdf).
- 144 Press statement, Secretary of State Antony J Blinken, Russia's 'Filtration' operations, forced disappearances, and mass deportations of Ukrainian citizens, US Department of State, 13 July 2022, <https://www.state.gov/russias-filtration-operations-forced-disappearances-and-mass-deportations-of-ukrainian-citizens/>.
- 145 Ukraine Media Centre, It is confirmed that more than 12,000 Ukrainian children are in Russia, about 8,600 of them are forcibly deported – Ombudsman, 14 December 2022, <https://mediacenter.org.ua/strong-it-is-confirmed-that-more-than-12-000-ukrainian-children-are-in-russia-about-8-600-of-them-are-forcibly-deported-ombudsman-strong/>.
- 146 Ministry of Foreign Affairs of Ukraine, Comment of the Ministry of Foreign Affairs of Ukraine on the illegal adoption of Ukrainian children in the Russian Federation, 27 October 2022, <https://mfa.gov.ua/en/news/statement-ministry-foreign-affairs-ukraine-illegal-adoption-ukrainian-children-russian-federation>.
- 147 Emma Bubola, Using adoptions, Russia turns Ukrainian children into spoils of war, *New York Times*, 22 October 2022, <https://www.nytimes.com/2022/10/22/world/europe/ukraine-children-russia-adoptions.html>.
- 148 Oleksii Reznikov, Twitter post, 9.43 a.m., 8 January 2023, [https://twitter.com/oleksiireznikov/status/1612022104488124417?ref\\_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1612022104488124417%7Ctwgr%5Edca49d1e35187288dc3ecacb9860a053141e7b7b%7Ctwcon%5Es1\\_&ref\\_url=https%3A%2F%2Fd-3684407808360463476.ampproject.net%2F2212151632002%2Fframe.html](https://twitter.com/oleksiireznikov/status/1612022104488124417?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1612022104488124417%7Ctwgr%5Edca49d1e35187288dc3ecacb9860a053141e7b7b%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Fd-3684407808360463476.ampproject.net%2F2212151632002%2Fframe.html).
- 149 Law enforcement and insider sources in Kyiv and Odesa confirmed that there is nothing coming into the port city: the ships using the grain corridor come in empty and leave with grain. There are no more ships coming in from Latin America and China; the only route is via Turkey under international supervision. Interviews with law enforcement and insider sources, Odesa and Kyiv, December 2022.

- 150 Interview with law enforcement source, Lviv, March 2022.
- 151 The border between Ukraine and Belarus has been closed for most of the war, making large-scale smuggling no longer viable.
- 152 Most cases of humanitarian aid fraud registered in Kyiv City, Lviv, Kharkiv, Kirovohrad regions – Monastysky, Interfax Ukraine, 22 June 2022, <https://en.interfax.com.ua/news/general/840841.html>.
- 153 Максим Опанасенко, Заступник Єрмака їздить на позашляховику, який General Motors передав Україні для гуманітарних цілей, Bihus.info, 27 October 2022, <https://bihus.info/zastupnyk-yermaka-yizdyt-na-pozashlyahovyku-yakyy-general-motors-peredav-ukrayini-dlya-gumanitarnykh-czilej/>.
- 154 State Security Service of Ukraine, SSU and NABU investigate possible misappropriation of humanitarian aid by top officials in Zaporizhzhia region, 30 August 2022, <https://ssu.gov.ua/en/novyny/sbu-ta-na-bu-rozsliduiut-mozhlyve-nezakonne-pryvasnennia-humanitarnoi-dopomohy-topposadovtsiamy-u-zaporizkii-oblasti>.
- 155 Interview with cyberworld source in Germany, May 2022.
- 156 Phil Muncaster, Ukrainian cops bust multimillion-dollar phishing gang, Infosecurity Magazine, 30 June 2022, <https://www.infosecurity-magazine.com/news/ukrainian-cops-bust/>.
- 157 Tobacco is illicitly produced in Ukraine, and smuggled into and through the country. According to Ukrainian law enforcement, cigarettes are smuggled into Ukraine from Romania, Belarus and the United Arab Emirates, with a proportion then rerouted into Europe; see Anna Myroniuk, Huge quantities of Chinese cigarettes smuggled into Ukraine, Organized Crime and Corruption Reporting Project, 22 June 2021, <https://www.occrp.org/en/loosetobacco/china-tobacco-goes-global/huge-quantities-of-chinese-cigarettes-smuggled-in-to-ukraine>.
- 158 Vlad Lavrov, Ukraine's 'lost' cigarettes flood Europe, International Consortium of Investigative Journalists, 29 June 2009, <https://www.icij.org/investigations/tobacco-underground/ukraines-lost-cigarettes-flood-europe/>.
- 159 Share of illegal cigarettes in Ukraine in Aug up to record 21.9% since independence, Interfax Ukraine, 2 November 2022, <https://en.interfax.com.ua/news/economic/869720.html>.
- 160 Ibid.
- 161 Ukrainian security discovered an illegal production of cigarettes of well-known brands in the Odessa region: The total cost of tobacco products and equipment is UAH 150 million, Odessa Journal, 4 August 2022, <https://odessa-journal.com/bes-discovered-the-illegal-production-of-cigarettes-of-well-known-brands-in-the-odessa-region-the-total-cost-of-tobacco-products-and-equipment-is-uah-150-million/>; Ministry of Internal Affairs of Ukraine, Нацполіція вилучила 5 тонн тютюнового фальсифікату, 21 November 2022, <https://mvs.gov.ua/uk/news/nacpoliciia-vilucila-5-tonn-tiutunovogo-falsifikatu>.
- 162 Kyiv School of Economics, The total amount of damage caused to Ukraine's infrastructure is more than \$127 billion — KSE Institute's report as of September 2022, 21 October 2022, <https://kse.ua/about-the-school/news/the-total-amount-of-damage-caused-to-ukraines-infrastructure-is-more-than-127-billion-kse-institute-s-report-as-of-september-2022/>.
- 163 World Bank, Ukraine recovery and reconstruction needs estimated \$349 billion, 9 September 2022, <https://www.worldbank.org/en/news/press-release/2022/09/09/ukraine-recovery-and-reconstruction-needs-estimated-349-billion>.
- 164 National Recovery Council, Ukraine's National Recovery Plan, July 2022, [https://uploads-ssl.webflow.com/621f88db25bf24758792dd8/62c166751f-cf41105380a733\\_NRC%20Ukraine%27s%20Recovery%20Plan%20blueprint\\_ENG.pdf](https://uploads-ssl.webflow.com/621f88db25bf24758792dd8/62c166751f-cf41105380a733_NRC%20Ukraine%27s%20Recovery%20Plan%20blueprint_ENG.pdf).
- 165 Stephen Lewarne et al., The reconstruction of Ukraine: Historical lessons for postwar reconstruction of Ukraine, Deloitte, 10 October 2022, <https://www2.deloitte.com/uk/en/insights/industry/public-sector/ukraine-reconstruction-plan.html>.
- 166 See, for example, Mark Raczkiewicz, Odesa mayor Trukhanov faces new criminal charges, accused of membership in organized crime and land theft, Ukrainian Weekly, 17 October 2021, <https://subscription.ukrweekly.com/2021/10/odesa-mayor-trukhanov-faces-new-criminal-charges-accused-of-membership-in-organized-crime-and-land-theft/>.
- 167 See Maryna Shashkova, Urban planning reform Ukrainian-style: What's behind the controversy, Kyiv Post, 15 December 2022, <https://www.kyivpost.com/post/5767>.
- 168 For details on this case, see Наталія Седлецька, Валерія Єгошина, Георгій Шабаєв and Кіра Толстякова, Велика відбудова. Керівник Дніпропетровщини платить бюджетні мільярди своїй супутниці – розслідування, Radio Svoboda, 2 November 2022, <https://www.radiosvoboda.org/a/skhemy-velyke-budivnytstvo-dnipropetrovshchyna/32111136.html>; Михайло Ткач, Фітнес-тренерка на мільярд. Як компанія близької подружки керівника Дніпропетровської ОДА стала найбагатшою під час війни, Pravda, 2 November 2022, <https://www.pravda.com.ua/articles/2022/11/2/7374579/>.
- 169 Cabinet dismisses deputy minister who allegedly received \$400,000 bribe, Kyiv Independent, 22 January 2023, <https://kyivindependent.com/news-feed/cabinet-dismisses-deputy-minister-who-allegedly-accepted-400-000-bribe>.



- 170 Interviews with anti-corruption NGOs, December 2022.
- 171 Інна Ведернікова, Керівник головного підрозділу детективів НАБУ Андрій Калужинський: «У нас люди, яких підозрюють чи обвинувачують у корупції, — рукопожатні. Їх підвищують по службі, у них беруть інтерв'ю та запрошують на заходи», ZN.UA, 23 December 2022, <https://zn.ua/ukr/internal/kerivnik-holovnoho-pidrozdlu-detektiviv-nabu-andrij-kaluzhinskij-u-nas-ljudi-jakikh-pidozrjuty-chi-obvinuvachujut-u-korupsiiji-rukopozhatni-jikh-pidvishchujut-po-sluzhbi-u-nikh-berut-intervju-ta-zaproshujut-na-zakhodi.html>.
- 172 Deputy defense minister summoned his resignation in wake of corruption scandal, *Kyiv Independent*, 24 January 2023, <https://kyivindependent.com/news-feed/deputy-defense-minister-summoned-his-resignation-in-wake-of-corruption-scandal>.
- 173 For full details of the investigation, see Юрій Ніколов, Трапилося найгірше, хоч і передбачуване, ZN.UA, 21 January 2023, <https://zn.ua/ukr/economic-security/tilovi-patsjuki-minoboroni-pid-chas-vijni-pilja-jut-na-kharchakh-dlja-zsu-bilshe-nizh-za-mirnoho-zhit-tja.html>.
- 174 Sergei Kuznetsov, Zelenskyy: There will never be peace talks with Putin, *Politico*, 28 September 2022, <https://www.politico.eu/article/volodymyr-zelenskyy-peace-talks-vladimir-putin-russia-ukraine/>.
- 175 Blue Crime on the Danube: Illicit flows into the heart of Europe?, *Observatory of Illicit Economies in South Eastern Europe*, Risk Bulletin 13, September–October 2022, GI-TOC, <https://riskbulletins.globalinitiative.net/see-obs-013/04-maritime-routes-trafficking-through-the-balkans.html>.
- 176 Ukrainian Ministry of Digital Transformation, Росія має намір знизити довіру до влади фейками про вразливість критичної інформаційної інфраструктури та «злив» даних українців, 16 January 2022, <https://thedigital.gov.ua/news/rosiya-mae-namir-zniziti-doviru-do-vladi-feykami-pro-vrazlivist-kritichnoi-informatsiynoi-infrastrukturi-ta-zliv-danikh-ukraintziv>.
- 177 For an in-depth assessment of the access changes to state registries, see Aliona Hryshko, (updated) Registers and war: Striking a balance between transparency and security, *Vox Ukraine*, 23 September 2022, <https://voxukraine.org/en/war-and-registries-striking-a-balance-between-transparency-and-security>.
- 178 Despite a significant number of personnel joining the armed forces, NABU did manage to refer 20 indictments to the court and launch 163 investigations in the first half of 2022. See Report first half 2022: On two fronts, p 15 and 46, [https://nabu.gov.ua/sites/default/files/reports/angl\\_sayt\\_final.pdf](https://nabu.gov.ua/sites/default/files/reports/angl_sayt_final.pdf).
- 179 Interview with editor of investigative project, Kyiv, December 2022.
- 180 OECD, Public governance in Ukraine: Implications of Russia's war, 1 July 2022, <https://www.oecd.org/ukraine-hub/policy-responses/public-governance-in-ukraine-c8cbf0f4/>.
- 181 See NAZK, Anti-Corruption Strategy for 2021–2025, <https://nazk.gov.ua/wp-content/uploads/2022/08/Anti-corruption-Strategy-for-2021-2025.pdf>.
- 182 See КАБІНЕТ МІНІСТРІВ МАЄ ДОТРИМУВАТИСЬ ЗАКОНОДАВСТВА ТА ЗАТВЕРДИТИ ДАП ДО 10 СІЧНЯ, *Transparency International Ukraine*, 6 January 2023, <https://ti-ukraine.org/news/kabinet-ministriv-maye-dotrymuvatys-zakonodavstva-ta-zatverdity-dap-do-10-sichnya/>; Daniel Boffey, 'No return to the past': the man leading Ukraine's fightback against corruption, *The Guardian*, 25 January 2023, [https://www.theguardian.com/world/2023/jan/25/oleksandr-novikov-leading-ukraine-fightback-against-corruption?CMP=Share\\_AndroidApp\\_Other](https://www.theguardian.com/world/2023/jan/25/oleksandr-novikov-leading-ukraine-fightback-against-corruption?CMP=Share_AndroidApp_Other).
- 183 See also the International Bar Association's establishment of a special task force in September 2022 to focus on anti-corruption and compliance matters during the reconstruction period. RISE Ukraine, <https://www.rise.org.ua>; Ukraine: IBA Anti-Corruption Committee creates taskforce to aid reconstruction efforts, *IBAnet.org*, 14 September 2022, <https://www.ibanet.org/Ukraine-IBA-Anti-Corruption-Committee-creates-taskforce-to-aid-reconstruction-efforts>.
- 184 France hosts conference for 'urgent' Ukraine winter help, *France24*, 13 December 2022, <https://www.france24.com/en/live-news/20221213-france-hosts-conference-for-urgent-ukraine-winter-help>.
- 185 Vasyl Zadvornyi, Post-war procurement: How Ukraine can ensure the reconstruction is transparent and effective, open contracting partnership, 26 May 2022, <https://www.open-contracting.org/2022/05/26/post-war-procurement-how-ukraine-can-ensure-the-reconstruction-is-transparent-and-effective/>.
- 186 Дана Гордійчук, Уряд скасував аукціони на Prozorro до кінця війни через відключення світла, *Ukrainska Pravda*, 3 January 2023, <https://www.epravda.com.ua/news/2023/01/3/695671/>.
- 187 Interviews with NGOs, December 2022.
- 188 Interviews with journalists, anti-corruption NGOs and law enforcement sources, Odesa, Dnipro, Kharkiv and Kyiv, December 2022.
- 189 Russian assets seized in Ukraine may be used for reconstruction – minister, *Reuters*, 28 October 2022, <https://www.reuters.com/world/europe/russian-assets-seized-ukraine-may-be-used-reconstruction-minister-2022-10-28/>.
- 190 Iana Fremer, Ukraine: New law enables expropriation of property of Russian Federation and its residents, *Library of Congress*, 2022, <https://www.loc.gov/item/global-legal-monitor/2022-03-30/ukraine-new-law-enables-expropriation-of-property-of-russian-federation-and-its-residents/>.

- 191 Expropriation of Russian assets & of entities and individuals deemed to support Russia's aggression, Nobles Law, 8 September 2022, <https://www.nobles-law.com/post/expropriation-of-russian-assets-of-entities-and-individuals-deemed-to-support-russia-s-aggression>; Oleksandr Zelenyi, Expropriation of Russian assets in Ukraine, Fieldfisher, 20 May 2022, <https://www.fieldfisher.com/en/insights/expropriation-of-russian-assets-in-ukraine>.
- 192 Interviews with various law enforcement sources, December 2022.
- 193 INTERPOL, G7 Ministers – INTERPOL tools essential in tackling transnational threats, 18 November 2022, <https://www.interpol.int/en/News-and-Events/News/2022/G7-Ministers-INTERPOL-tools-essential-in-tackling-transnational-threats>.
- 194 INTERPOL, Ukraine: INTERPOL General Secretariat statement, 10 March 2022, <https://www.interpol.int/en/News-and-Events/News/2022/Ukraine-INTERPOL-General-Secretariat-statement>.
- 195 In September 2022, a Ukrainian senior prosecutor said that the severing of ties between Russian and Ukrainian law enforcement was hampering an investigation into the large-scale online sexual exploitation of Russian children after a Ukrainian was arrested in Kyiv with a vast cache of exploitative images and videos. According to the prosecutor, 15 Russian children had been identified, but Kyiv officials could not trace further victims or arrest traffickers in Russia due to the lack of a contract with Russian counterparts. See Lorenzo Tondo, Ukraine police uncover child sexual abuse ring involving Russian children, *The Guardian*, 8 September 2022, <https://www.theguardian.com/world/2022/sep/08/ukraine-police-uncover-child-sexual-abuse-ring-involving-russian-children>.
- 196 Zelensky urges to appoint heads of SAPO, NABU, Kyiv *Independent*, 17 July 2022, <https://kyivindependent.com/uncategorized/zelensky-urges-to-appoint-heads-of-sapo-nabu>; David Klein, Ukraine appoints long awaited anti-graft chief, OCCRP, 21 July 2022, <https://www.occrp.org/en/daily/16592-ukraine-appoints-long-awaited-anti-graft-chief>; Ukraine anti-graft agency gets new acting head, NV, 18 April 2022, <https://english.nv.ua/nation/ukraine-s-anti-graft-agency-gets-new-acting-head-50234926.html>.
- 197 Although the Russian invasion has changed the context, see Mark Galeotti's 2021 assessment of the challenges and aims of intelligence service reform In Ukraine, Moldova and Georgia: Mark Galeotti, The secret battlefield: How the EU can help Georgia, Moldova, and Ukraine protect against Russian subversion, European Council on Foreign Relations, 15 December 2021, <https://ecfr.eu/publication/the-secret-battlefield-how-the-eu-can-help-georgia-moldova-and-ukraine-protect-against-russian-subversion/>.
- 198 The GI-TOC is currently compiling a proposal outlining how such a programme might be structured.







# GLOBAL INITIATIVE

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