

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION FOR THE SUPPRESSION
OF THE FINANCING OF TERRORISM AND OF THE INTERNATIONAL
CONVENTION ON THE ELIMINATION OF ALL FORMS OF RACIAL
DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

REJOINDER

SUBMITTED BY THE RUSSIAN FEDERATION

VOLUME VI

(ANNEXES 21 - 41)

10 MARCH 2023

TABLE OF CONTENTS

VOLUME VI

Annexes 21-41

Annex 21	Expert Report of Sergey Miroslavovich Markedonov, 8 March 2023.
Annex 22	Witness Statement of Alexei Gayarovich Zhafyarov, 28 February 2023.
Annex 23	Second Witness Statement of [REDACTED], 7 March 2023.
Annex 24	Expert Witness Statement of [REDACTED], 6 March 2023.
Annex 25	Witness Statement of Valentina Vasilyevna Lavrik, 7 March 2023.
Annex 26	Witness Statement of [REDACTED], 2 March 2023.
Annex 27	Witness Statement of [REDACTED], 18 February 2023.
Annex 28	Witness Statement of [REDACTED], 7 March 2023.
Annex 29	Witness Statement of [REDACTED], 7 March 2023.
Annex 30	Witness Statement of [REDACTED], 22 February 2023.
Annex 31	Witness Statement of [REDACTED], 3 March 2023.
Annex 32	Witness Statement of [REDACTED], 2 March 2023.
Annex 33	Witness Statement of [REDACTED], 7 March 2023.
Annex 34	[REDACTED], Informational Note.
Annex 35	Ministry of Internal Affairs, Information on the number of missing persons in the Republic of Crimea and the City of Sevastopol between 2014 and 2022, No. 3466/dp, 22 February 2023.
Annex 36	Uspishna Varta, THE RIGHT TO FREEDOM OF SPEECH AND OPINION IN UKRAINE: THREATS AND OPPORTUNITIES, 2018.
Annex 37	Mediacentre n.a. I. Gasprinsky, Letter, 2 March 2023.
Annex 38	Council of Ministers of the Republic of Crimea, Letter No. 1/01-46/8775/3/3/214, 14 February 2023.
Annex 39	A. Dyukov, M. Vilkov, FROM MURDERS TO POGROMS: UNPUNISHED VIOLENCE FROM THE SIDE OF RIGHT-WING ACTIVISTS AGAINST ROMA IN UKRAINE (Warsaw, 2018).

- Annex 40 S. Vnukov, O. Sharov, CRIMEA - TAURIDA. ARCHAEOLOGICAL RESEARCH IN CRIMEA IN 2017-2018 (Institute of Archeology RAS, 2019, Vol. 1).
- Annex 41 S. Kozlov, GRU SPETSNAZ: FIFTY YEARS OF HISTORY, TWENTY YEARS OF WAR (Russkaya Panorama Publishers, Essays on Contemporary History Series, 2003).

Annex 21

Expert Report of Sergey Miroslavovich Markedonov, 8 March 2023

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM
AND OF THE INTERNATIONAL CONVENTION ON THE ELIMINATION
OF ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

**EXPERT REPORT
OF SERGEY MIROSLAVOVICH MARKEDONOV**

8 MARCH 2023

TABLE OF CONTENTS

I.	INTRODUCTION	3
A.	Qualifications.....	3
B.	Questions Put to the Expert	4
II.	SUMMARY	5
III.	NONCONTRADICTIONARY HISTORICAL NARRATIVE AND ITS COSTS	7
IV.	UKRAINIAN PROJECTS: PROBLEMS OF REPRESENTATIVENESS	11
V.	NATIONAL PROJECTS OF THE TWENTIETH CENTURY	16
VI.	EXPERT DECLARATION	19

I. INTRODUCTION

A. QUALIFICATIONS

1. My name is Sergey Miroslavovich Markedonov. I am a Russian international political scholar, specialist in nationalism and nation-building issues, conflicts in the post-Soviet space and European security, Candidate of Sciences (History), leading scholar of the Centre for Euro-Atlantic Security, Institute of International Studies, MGIMO, Editor-in-Chief of International Analysis Journal.

2. I describe my relevant experience below:
 - (a) 2001-2010 – Head of Department, Deputy Director (January 2009 – May 2010) at the Institute for Political and Military Analysis. Since 2006 – Associate Professor at the Faculty of World Politics, Lomonosov Moscow State University, and the Faculty of Modern Russian History, Russian State University for the Humanities.

 - (b) May 2010 – October 2013 – Visiting Fellow, Center for Strategic and International Studies, Russia and Eurasia Program (Washington, DC, USA). February 2014 – March 2019 – Associate Professor, Faculty of Foreign Regional Studies and Foreign Policy, Russian State University for the Humanities.

 - (c) Visiting researcher at the Institute for Humanitarian Research (IWM) in Vienna, Austria (June-July 2014), Fudan University in Shanghai, PRC (April-May 2015), German Society for Foreign Policy (DGAP) in Berlin, FRG (August-September 2016). Visiting Professor at the Centre for Eurasian Studies at the University of Mumbai, India (January 2016).

 - (d) Since 2014, expert at the Russian Council on Foreign Affairs and the Gorchakov Foundation for the Support of Public Diplomacy. I have extensive experience in analytical work and field research on security issues in the South Caucasus, Ukraine, Moldova, and the relationship between Russia, the US, NATO, and post-Soviet states in the context of Euro-Atlantic security.

- (e) I regularly participate in prestigious international academic and scholarly conferences, including those under the auspices of the UN, the OSCE, the Council of Europe, the Russian Council on Foreign Affairs, the Gorchakov Foundation, Georgetown University, Harvard University, Princeton University, Columbia University, Lomonosov Moscow State University, MGIMO, the Higher School of Economics.
- (f) I am the author of more than 50 scientific publications, as well as numerous expert and analytical reports and commentaries in the media.

B. QUESTIONS PUT TO THE EXPERT

3. I have been asked to prepare an expert report for submission to the International Court of Justice in the case before ICJ, "Application of the International Convention for the Suppression of the Financing of Terrorism and of the International Convention on the Elimination of All Forms of Racial Discrimination" (Ukraine v. Russian Federation). My task is to assess, whether Second Expert Report of Professor Paul Robert Magocsi adequate and scientifically sound describes the way of Ukraine and Ukrainians to their independent national-state existence.

II. SUMMARY

4. As a result of the analysis of the available materials provided by Ukraine in support of its allegations as well as of publicly available sources I have come to the following conclusions.
5. General conclusions:
 - (a) The Second Expert Report of Professor P.R. Magocsi aims to form an idea of the struggle of Ukraine and Ukrainians for their independent national-state existence as a deterministic and noncontradictory process without alternatives. However, the external consistency of the author's constructions comes at the expense of significant simplifications and sometimes distortions, which in the end give a wrong picture.
 - (b) The Ukrainian lands were under different sovereignties, and the people who lived there participated in different state projects and were bearers of different loyalties and identities. For a considerable part of historical time, the Russian and Ukrainian peoples were in unity, which led to their mutual cultural enrichment and development. Up until the nineteenth century, debates about identity options and different interpretations of the proximity/differences between the Great Russians and the Little Russians were debates that took place within a narrow elite educated stratum. In the second half of the 19th century, we observe the first, extremely limited in their numbers Ukrainian nationalist associations - the Kirill and Mefodiy Society of the 1840s and the Kiev Hromada of the 1860s. However, neither they, nor the associations that followed, both in the Russian Empire and in Austria-Hungary, built their plans according to a single design. Some of them promoted the idea of the particular Ukrainian statehood but some supported federalist, democratic or socialist values, not looking for the breakup with the Russian people. Anti-Russian sentiments manifested themselves, largely fuelled from outside, during the two World Wars and the civil wars, but were not deterministic until the beginning of the twenty-first century.

- (c) In the current context, it is crucial not to use the historical past as a tool to deepen the confrontation. Unfortunately, attempts to simplify and distort the narratives of Ukraine, to reduce them to the Galician-Diasporan myth (with the important caveat that ‘Russophile sentiment’ was not something marginal in the eastern regions of Austria-Hungary until the early 20th century, which is what P. R. Magocsi does, have not only academic, but also political consequences. It has formed the basis of educational policy which largely consisted of the closing of Russian schools and narrowing of the sphere of the Russian language use. Attempts to homogenise the Ukrainian identity on the basis of this narrative resulted in the loss of Crimea and the south-eastern regions of the country.

6. I describe my findings in more detail below.

III. NONCONTRADICTIONARY HISTORICAL NARRATIVE AND ITS COSTS

7. In the introductory part of his report, P.R. Magocsi clearly formulates his super-objective as a study of the historical experience of Ukrainian nation-state-building. From his point of view, the Declaration of Independence adopted by the Verkhovna Rada (Parliament) of Ukraine on August 24, 1991, did not open anything fundamentally new in the history of that country. According to Magocsi, “in fact, during the twentieth century alone, independence was proclaimed for all or part of Ukrainian territory no less than five times before 1991. Nor was the idea of statehood in Ukraine limited to the twentieth century. Three centuries earlier Ukrainians created a state which existed in some form from the mid-seventeenth to late eighteenth centuries”.
8. Thus, the author offers a coherent and noncontradictory historical narrative, according to which the struggle for an independent state has been consistently waged by the bearers of a separate Ukrainian identity for at least three and a half centuries. A kind of continuity line is constructed from the Zaporozhian Army led by Bohdan Khmelnytsky and the Hetmanate (among its leaders Magocsi gives special prominence to Ivan Mazepa) to the post-Soviet Ukrainian state project.
9. However, the other side of that noncontradictory historiographical construct tends to oversimplify the historical past of Ukraine. The author ignores a number of fundamental features of Ukrainian history.
10. First, the very concepts of Ukraine, Ukrainian, as well as the geographical scope of their application have evolved over the centuries.¹ They also coexisted with other self-identifications – Maloross (Little Russian), Russian, Rusyn and Cossack. Until the middle of the 16th century, in the Kingdom of Poland and the Grand Duchy of Lithuania, the local population of the former Rus (present-day Ukraine) was referred to as ‘Rusyns’. Then new forms appeared Latin Ruthenia/Ruthenians and Roxolania/Roxolanus, as well as Hellenized ‘Russia’ (Rosia) and ‘Russian people’. From the fourteenth century the term ‘Malorossia’ (Little Russia) appears, first to denote the Polish part of the Kiev metropolis, and after 1648 the territory of the Cossack Hetmanate. In the Moscow State, the inhabitants of the Orthodox lands of the Polish-Lithuanian Commonwealth were

¹ F. Gaida, *BORDERS AND BOUNDARIES: NOTIONS OF “UKRAINE” AND “UKRAINIANS” IN THEIR HISTORICAL DEVELOPMENT*. (Moscow: Modest Kohlerov. 2019).

called 'Lithuanians' or 'Cherkasses', and only later 'Little Russians' or 'Cossacks'. The term 'Ukrainians', 'Ukrainian people' was originally used not as an ethnonym, but as a characteristic of near-the-border ('u krainy') population.

11. Politicians and intellectuals of different eras and different countries put different meanings into the concept of 'Ukrainian' (local, ethnic, national, civil). While for a Soviet citizen the regions of Donbas were parts of the Ukrainian SSR, for a resident of the Russian Empire or the Polish-Lithuanian Commonwealth of the first half of the 18th century they were perceived as 'Wild Fields', disputed and undeveloped areas with no clear connection to a particular state.²
12. Secondly, all attempts to create a special statehood in the period from the XVII to the XX centuries in the territory of post-Soviet Ukraine were realized in different geographical configurations. The same Zaporizhian Host or Hetmanate did not have in its composition not only Crimea and Donbas, the regions about which Professor Magocsi writes as unconditionally Ukrainian, but also the territories on the right bank of the Dnieper. By the way, the famous project of Ivan Mazepa's closest associate Philip (Pylyp) Orlyk (1710), which in post-Soviet Ukrainian historiography is defined as the 'first Constitution' of Ukraine, was called 'The Treaties and Resolutions of the Rights and Freedoms of the Zaporozhian Army'.³
13. However, even in the twentieth century we can speak rather of Ukrainian projects than of a single Ukrainian project. A striking example is the (co)existence of the Ukrainian and West Ukrainian republics, which, despite their proclaimed unification into a 'single sovereign' state, in practice never managed to fully integrate.⁴
14. Thirdly, P.R. Magocsi underestimates the obvious collision between the current national-territorial ambitions of Kiev (which he consistently defends) and the historical process of

² Danilevsky I.N., Tairova-Yakovleva T.G., Shubin A.V., Mironenko V.I. HISTORY OF UKRAINE. SPb. Aletheia, 2015. - 290 p. Kotenko A.L., Martyniuk O.V., Miller A.I. 'MALOROSS': EVOLUTION OF THE NOTION BEFORE THE FIRST WORLD WAR // Independent Literary Review. - M., 2011. - № 108. - P. 9-27.

³ Treaties and regulations of rights and liberties of army between hetman Philip Orlik, newly elected after Mazepa's death and between general's foreman and Zaporizhian army in 16 articles, in Bendery, signed and sealed by Orlik. 1710. April. 5 //Russian State Archive of Ancient Acts (RSAAC). V. 124. Opt. 2. D. 12. p. 2-12. The state is defined in the document as 'Little Russia, our Fatherland' (Article 2), 'Ukraine' (Article 14), and the inhabitants are referred to as 'the people of Little Russia', 'the sons of Little Russia'.

⁴ Borysenok E.Y. NON-SOVIET UKRAINIANISATION: POLISH, CZECHOSLOVAKIAN AND ROMANIAN AUTHORITIES AND THE 'UKRAINIAN QUESTION' IN THE INTERWAR PERIOD. Moscow: Algorithm. 2018. 141 p.

‘gathering’ of Ukrainian lands. On the one hand, he agrees that the current ‘territorial integrity’ of Ukraine (within the 1991 borders) has been shaped by other political forces rather than fighters for a national Ukrainian idea. He emphasizes that after the victory of the USSR in World War II ‘for the first time in history, the vast majority of ethnic Ukrainian-inhabited lands (as defined by Ukrainian scholars) were within the borders of a single Ukrainian, albeit Soviet, state. Moreover, these were the lands (especially historic Galicia) where the Ukrainian national movement had its earliest beginnings and where ethnic national identity was still at its strongest and most widespread’.

15. Indeed, it was the Soviets who incorporated Galicia, Volhynia, Transcarpathia, Northern Bukovina and Southern Bessarabia into the Ukrainian SSR. But the process did not end in 1945; in 1954 it was followed by Crimea. It is also worth adding to this picture that in the pre-revolutionary period it was not the Ukrainian movement but the Russian imperial authorities who had formed the territorial predicates of the future independent Ukraine, including the Northern Black Sea coast (1760-1770s), the territory of the former Crimean Khanate (1783), the southern lands between the Dnieper and Bug rivers (1791) and the lands of Right-bank Ukraine as a result of the partitions of the Commonwealth of Poland and Lithuania.
16. Thus, both the Ukrainian SSR and present-day Ukraine have a multi-ethnic population with different ideas about identity, statehood and different ideals for the past and the future.
17. Fourth, P.R. Magocsi's historiographical constructs almost completely ignore the loyalist sentiments among the ancestors of modern Ukrainians. Meanwhile, existing within the framework of various state projects (Rzeczpospolita, the Moscow state and the Russian Empire, the Austrian Empire/Austro-Hungary, the interwar Poland, Czechoslovakia, Romania, the Soviet Union-UkrSSR), they were involved in the socio-political and socio-economic processes in these countries, promoted their interests and ensured their security. There is no reason to consider Ukrainians (Little Russians, Ruthenians) as immanent separatists, aiming only at the implementation of their national project. The Polish-Lithuanian Commonwealth was supported by the ‘Russian families’ of the Ostrozhskis and Vishnevetskis, while the Russian imperial military and diplomatic elite was reinforced by such figures as Alexander Bezborodko, Ivan Paskevich and Viktor Kochubey. In the USSR of Leonid Brezhnev's time, the so-called ‘Dnepropetrovsk clan’

was the basis of power, and even the Secretary General defined himself in the 1926 census as 'Ukrainian'.⁵

18. Fifth, Magocsi's work is based on the conclusions of almost exclusively English-speaking historiography (American-Canadian researchers of Ukrainian origin). The arguments (with which the author could have disagreed) of Soviet Marxist historians, representatives of the 'Russians abroad', pre-revolutionary Russian researchers and contemporary specialists from Russia and Ukraine have been left without any attention.⁶

⁵ LITTLE RUSSIANS VS UKRAINIANS: THE UKRAINIAN QUESTION IN THE SCIENCE, STATE AND CULTURAL POLICY OF THE RUSSIAN EMPIRE AND THE USSR. Essays. Collective monograph. - Moscow: Institute of Slavic Studies, Russian Academy of Sciences. 2018. - 528 p.

⁶ Miller A.I. 'UKRAINIAN QUESTION' IN THE POLICY OF THE AUTHORITIES AND RUSSIAN PUBLIC OPINION (SECOND HALF OF THE XIX CENTURY). SPb. 2000. 260 p. Bicilli P. M. PROBLEM OF RUSSIAN-UKRAINIAN RELATIONS IN THE LIGHT OF HISTORY // Selected works in philology M.: Heritage, 1996. P.107-134. Danilevsky, I.N. et al. Op. cit. Myakotin V. ESSAYS ON THE SOCIAL HISTORY OF UKRAINE IN THE XVII-XVIII CENTURIES. Volumes 1-3. Prague, 1924.

IV. UKRAINIAN PROJECTS: PROBLEMS OF REPRESENTATIVENESS

19. One of the ideologues of contemporary Ukrainian nationalism and well-known historian Mikhail/Mykhailo Hrushevsky presented his programmatic socio-political pamphlet in the form of the question ‘Who are the Ukrainians and what do they want?’⁷ In answering it, perhaps the key issue is the question of representativeness. Who can we consider to be the spokesman for the will of Ukraine and its people? Magocsi mentions Bohdan Khmelnitsky as one of the founding fathers of Ukrainian statehood, and makes the Cossacks look almost identical to the Ukrainians. However, the ‘free Cossacks’ opposed not only nobles and magnates of the Polish-Lithuanian Commonwealth, but also Registered Cossacks (the same Little Russians, like the famous hetman, who received funding for their service from the Polish-Lithuanian state). That project was not supported by the elite Little Russian groups either, which were defined in the sources as ‘Ruthenian by origin, Polish by nationality’. And it is no coincidence that the period of 1650-1680s in the history of Ukraine was called ‘Ruina’ (the Ruin).⁸ At the same time such a notion as ‘multi-Hetmanship’ came into use. It was an order when some hetmans were oriented to Moscow, some to Warsaw, some to Bakhchisarai and Istanbul while some even to Sweden that did not share the common border with the Little Russian lands but actively intervened the Eastern European politics. It is by no means an idle question which of them can be considered the bearers of the ‘true’ idea of Ukrainian statehood. Not to mention the considerable social distance between the Cossack nobility (who dreamed of rights and privileges similar to those of the Polish-Lithuanian nobility) and the peasants of Little Russia. Thus, we can not speak of any single image of a ‘free Ukraine’; on the contrary, we can speak of a competition among a variety of projects (the pro-Polish choice of Ivan Vygovsky, pro-Ottoman of Pyotr/Petro Doroshenko, and pro-Russian of Ivan Briukhovetsky, who was the first Moscow boyar - a Cossack of Zaporozhye). It should be noted that all the aforementioned hetmans and some other Cossack leaders changed their ‘geopolitical vector’ more than once.⁹

⁷ Hrushevsky M.S. WHO UKRAINIANS ARE AND WHAT THEY WANT. Kiev. ‘Znannya Ukrainy’, 1991. - 240 p.

⁸ Kostomarov N. I. ‘RUINA’, ‘MAZEPA’, ‘MAZEPA FOLLOWERS.’ HISTORICAL MONOGRAPHS AND STUDIES. (Series ‘The Actual History of Russia’). M.: Charlie, 1995. - 802 p.

⁹ Yakovleva (Tairova) T. G. HETMANS IN THE SECOND HALF OF THE 50S OF THE XVII CENTURY, THE REASONS AND THE BEGINNING OF THE RUIN. Kiev. Osnivy. 1998. - 447 p.

20. P.R. Magocsi, describing the Little Russian Hetmanate as ‘a largely self-governing entity in central Ukraine for well over a century until it was abolished in the 1780s by the Russian imperial authorities under Catherine II’, gives special prominence to the figure of Ivan Mazepa. However, the number of his supporters, who arrived with him in the vicinity of Poltava to the Swedish King Karl XII’s positions, is estimated by the sources as 3-4 thousand people, while about 16 thousand ‘loyal Cossacks’, headed by hetman Ivan Skoropadsky, gathered under the banners of Peter I. Why then should not Skoropadsky (as well as other figures of Hetmanate, such as Daniel Apostol), but Mazepa in this case be considered the spokesman of the Ukrainian people?¹⁰
21. In his report, Magocsi draws a comparison between the policies of St Petersburg and Vienna on the ‘Ukrainian track’ in favour of the latter. According to him (referring to his own work!), ‘the rulers of Habsburg Austria tolerated and even encouraged the national movement among Ukrainians (officially called Ruthenians at the time) based in the ”western” city of Lviv, while the tsarist Russian authorities aggressively attempted to suppress the Ukrainian national movement among Ukrainians (officially called Little Russians) based in the ”eastern” city of Kyiv.’ However, one should not forget the existence of a powerful ‘Moscowphile’ (‘Russophile’) social movement in Austria-Hungary. The situation was interesting and at times paradoxical, when the Little Russians, subjects of the Russian Empire, were striving for cooperation with the Austrians, while the Ruthenians, subjects of Emperor Franz Joseph, were dreaming of unity with Russia. Consequently, there was no Galician monopoly on the Ukrainian project, nor was there any anti-Russian predetermination.
22. The pro-Russian Ruthenian movement in Austria-Hungary, on the other hand, was gradually suppressed by Vienna from the moment the anti-Russian alliance with Germany was concluded. With the beginning of the First World War it created two concentration camps for these people in Talerhof and Terezin, where 30,000 people were held. They were, incidentally, the first such camps in Europe. By the way, in 1914-1918 the Ukrainians found themselves on both sides of the ‘barricades’ and were forced to fight

¹⁰ Pavlenko N.I. PETER THE GREAT. Moscow, Mysl. 1990. - 670 p.

against each other. Three and a half million Ukrainians (Little Russians) were in the Russian army, 250 thousand served in the Austrian army.¹¹

23. The desire to ensure the noncontradictory character of the expert narrative also leads the author away from considering the competition of various national projects in Ukraine throughout its history. P.R. Magocsi is trying to brush aside the article by Russian President V.V. Putin 'On the historical unity of Russians and Ukrainians'.¹² According to him, it is 'denying the historical right of the Ukrainian people to a state of their own, and even denying that the Ukrainian people are ethnically distinct from their Russian neighbours.' However, such an approach is not scientific and the conclusion of the author is incorrect. The question of the historical unity of Russians and Ukrainians was the subject of study as early as in the 70s of the XVII century, soon after the left bank of the Dnieper became part of the Kingdom of Moscow after the revolt of Bohdan Khmelnytsky and the war with the Commonwealth of Poland and Lithuania. It was reflected in the Synopsis 'about a single Slavic-Russian people, part of which were both Little Russians and Great Russians', compiled in Pechersk Lavra in Kiev.¹³ At that time, the terms 'Little Russia' and 'Great Russia', as well as the terms 'Little Poland' and 'Great Poland', denoted a 'small' - in the sense of 'original' - and a 'great' - in the sense of 'extended' - part.
24. The idea of an all-Russian nation resonated with a significant number of Little Russians. The struggle for identity in the region was between Russian-oriented Little Russians and Ukrainians, who shared the idea of a separate Ukrainian nation. For instance, the Union of the Russian People, even in Volhynia, had far more than 100,000 members at the beginning of the 20th century before World War I. Large Russian organizations that united upper classes flourished in Kiev and Odessa. The monument to Pyotr Stolypin in Kiev, unveiled in 1913 in front of the opera house where he was assassinated in 1911, bears the words of the Prime Minister engraved on it: 'I firmly believe that the light of

¹¹ Miller A.I. NATIONAL IDENTITY IN UKRAINE: HISTORY AND POLITICS // Russia in Global Affairs. 2022. V. 20. - № 4.- P. 46-65.

¹² Article by Vladimir Putin 'On the historical unity of Russians and Ukrainians', 12 July 2021, available at: <http://kremlin.ru/events/president/news/66181>.

¹³ Miller A.I. NATIONAL IDENTITY IN UKRAINE: HISTORY AND POLITICS // Russia in Global Affairs. 2022. V. 20. - № 4.- P. 46-65.

the Russian national idea kindled in the West of Russia will not go out and will soon illuminate the whole of Russia'.¹⁴

25. Moreover, a number of prominent historical figures of science and culture born in Ukraine held views about the unity of Russians and Ukrainians (Little Russians). Nikolai Gogol, in particular, pointed out: 'Russian and Little Russian are twin souls, complementing each other, related and equally strong. It is impossible to give preference to one over the other'.¹⁵
26. Ukrainian historian and public figure Mikhail Dragomanov (by the way, a harsh critic of national policy of the Russian Empire) wrote: '...The real Ukrainian policy in Russia must exclude any thought of state separatism and, therefore, have as its goal only political reform of the entire state on the basis of regional and communal autonomy'.¹⁶ Reviewing Dragomanov's work, the Galician-born prominent writer Ivan Franko developed these theses: 'No intelligent man with even a shred of political common sense, much less Dragomanov, could even in the most exuberant imagination paint himself the possibility of separating or fencing off the Ukrainian land from Russia. Whoever knows at least a little bit about the ethnographic borders between the Ukrainian, Great Russian and other adjacent peoples can only wonder at the naivety of a publicist who presents such a fantasy as a postulate of an intelligent politician'.¹⁷
27. The world-renowned philosopher Grigory/Hryhorii Skovoroda was a proponent of the Little Russian identity and a single Russian nation of three branches. Several research institutes in Ukraine still bear his name and his image is on the 500 hryvnia banknote.
28. The artificial separation of Russians and Ukrainians was not supported by such well-known figures of science and culture, natives of Ukraine as Academician Petro

¹⁴ Ibid.

¹⁵ Quoted from: Danilevsky G.P. ACQUAINTANCE WITH GOGOL (FROM LITERARY MEMOIRS) //Historical Bulletin. 1886. № 12. P. 479.

¹⁶ Cited from: Teslya A.A. NATIONAL-POLITICAL VIEWS OF M. P. DRAGOMANOV IN 1888-1895 // Sociological Review. - 2016. - V. 15. - № 1. P. 106.

¹⁷ Funko I. MIKHAILO DRAGOMANOV. MISSING TIME. UKRAINIANS UNDER THE MOSCOW KINGDOM (1654 - 1876) // Collected works in 50vv. Vol. 47. Kiev: Naukova Dumka, 1986. P. 403 - 404.

Tolochko,¹⁸ President of the Ukrainian SSR Academy (and later National Academy of Sciences) in 1962-2020, hero of Ukraine Boris Paton.

29. Thus, over several centuries, Ukrainians (Little Russians, Cossacks) have had a wide spectrum of views as to their identity. Some defended the version of Ukrainian independence; a significant part of the population rejected it, supporting the idea of a triune Russian nation under the aegis of an Orthodox monarch. Some saw Ukraine as an Orthodox entity, while others fought for a 'Church Union' (going back to the transfer the ecclesiastical jurisdiction in the Ruthenian lands of the Polish–Lithuanian Commonwealth from the Ecumenical Patriarchate of Constantinople to the jurisdiction of the Holy See of 1596).
30. Ukrainians were subjects of different states and were prepared to defend them, not just their own particular ethno-national interests. In this respect, one of the main flaws of P.R. Magocsi's report is the neglect of Ukrainian multi-component nature, identity/loyalty-based multi-culturalism.

¹⁸ Tolochko P.P. WHERE THE RUSSIAN LAND CAME FROM. Kiev. Publishing House D. Burago. 2016. 291 p.

V. NATIONAL PROJECTS OF THE TWENTIETH CENTURY

31. The author pays particular attention in his report to the twentieth century, a time when empires were being replaced by nation-states. He focuses on the Ukrainian People's Republic. However, between 1917 and 1920, a dozen or so different republics emerged on the territory of the future Ukrainian SSR. In addition to several Ukrainian People's Republics, the establishment of the Donetsk-Krivoy Rog Republic, the Odessa Soviet Republic, the Socialist Soviet Republic of Taurida, the Crimean Regional Government, the West Ukrainian People's Republic, the Galician Socialist Soviet Republic and the Crimean Soviet Socialist Republic was announced.
32. And it would be quite wrong to present the processes of 'Sovietisation' as something directed solely by Moscow. At the time there was a civil war within Russia itself between the Bolsheviks and the 'white' counter-revolutionary forces, and there was no single centre for decision-making. Of particular note was the Ukrainian State, a project of former Tsarist Adjutant-General Pavel Skoropadsky, who had proclaimed himself Hetman. While supporting the idea of Ukrainian independence, his government did not rule out a federation with Russia on the basis of the fight against the Bolshevik threat. Nestor Makhno's anarchist movement, centred in what is now Zaporozhye and Dnepropetrovsk/Dnieper Oblasts, also played a significant role in determining the outcome of the civil war on the ruins of the Russian Empire.
33. All this shows that different parts of Ukraine had different visions of the country's future development due to historical factors. However, all of them envisaged isolation within the boundaries of those territories that encompassed the new entities. Thus, we can say that the territory of Ukraine in 1917-1920 was a mosaic of different formations, which were often the result of the ambitions of individual politicians, a situational reaction to changes in Moscow, Petrograd or Kiev, rather than a deliberate implementation of some clear national-state programme.¹⁹
34. Magocsi's report does not actually consider the events of the Second World War and their impact on the projects of Ukrainian statehood. The author's analysis is limited to the territorial increments of the Ukrainian SSR (due to victory of the Soviet Union in the

¹⁹ Zhiltsov S.S. HISTORY OF THE FORMATION OF THE UKRAINIAN STATE (BEFORE THE COLLAPSE OF THE USSR) // Problems of the post-Soviet space. - 2018. VOL. 5. - No. 3.- PP. 309-328.

Great Patriotic War) and the attempts to declare independence in the late 1930s and early 1940s. Meanwhile, in today's Ukraine the activities of the Organization of Ukrainian Nationalists, the Ukrainian Insurgent Army, which are part of the phenomenon of collaboration with Nazi - Hitler Germany, are glorified at the state level, which leads to an internal division of Ukraine.²⁰ To no small extent, the popularisation and imposition of the Galician myth throughout Ukraine after 1991 has contributed to the internal divisions in that country, first predominantly in electoral terms and then, during the Orange Revolution and Second Maidan, region-wise. Meanwhile, according to Soviet historians' calculations, over 16% of the Red Army personnel were of Ukrainian origin (about 7 million people). Dozens of partisan detachments operated behind the Germans' lines. As many as 2,021 Ukrainians were awarded the title of Hero of the Soviet Union.²¹

35. The sections of the report dealing with the post-Soviet period look more like a presentation of Ukrainian 'civic nationalism'. Indeed, the post-1991 situation in the country is paradoxical. By and large, the historical events of the early 1990s were not the logical conclusion of a protracted and heroic national liberation struggle but rather an agreement reached between the Ukrainian communist nomenklatura and Ukrainian nationalists. Against the background of the beginning of the USSR's collapse, the communist apparatchiks in Kiev realised that the only way to remain in power was to get rid of the power of Moscow, retaining full political and economic control on the basis of a new legitimization, i.e. fight for independence.
36. This allowed the well-known Ukrainian journalist Aleksandr Krivenko to characterise the new national elite of post-Soviet Ukraine as 'a product (fusion) of communists and nationalists.'²² The conglomerate nature of the post-Soviet Ukrainian elite has kept the country's political system running for years. It was a consequence of maintaining a complex balance of interests between different political, financial and economic groups, with none of them gaining complete dominance. It is a rhetorical question, whether it had anything to do with the declared principles of 'unity in diversity'. Rather, it was the

²⁰ Bakanov A. I. 'NO KATSAP, NO KIKE, NO LYAKH'. THE NATIONAL QUESTION IN THE IDEOLOGY OF THE ORGANIZATION OF UKRAINIAN NATIONALISTS. Moscow: Algorithm. 2014. 535 p.

²¹ The list is verified by books: 'HEROES OF THE SOVIET UNION: SHORT BIOGRAPHICAL DICTIONARY / I. N. Shkadov. - Moscow: Voenizdat, 1987.

²² Quoted from Bondarenko K. Yevhen 'KUSHNAREV AND THE END OF UKRAINIAN CLASSICAL POLITICS'. <http://www.vecherniy.kharkov.ua/printnews/48355>

preservation of the multiple forms and ways of life inherited from the Ukrainian SSR and pre-revolutionary times. And the attempts of Ukrainian politicians to homogenise the identity space by prioritising the ‘escape from Russia’ contributed to the internal crises that erupted during the Orange Revolution, the Second Maidan and the Russian Spring.

37. P.R. Magocsi speaks about the ‘unification’ of the ‘Ukrainian civic nation’ during the events of 2014-2022. ‘The newest war with Russia (February 2022) has shown how strong and widely shared the Ukrainian identity, whether ethnic or civic, has become,’ he concludes. Magocsi is not alone in this; representatives of the Western expert community consider the Russian factor to have ‘consolidated’ Ukrainian society.²³ This assessment does not take into account that, first of all, the Ukrainian national project has significantly changed since February 2014. After the collapse of the Soviet Union, it represented a compromise between a modification of the Ukrainian SSR and the nationalism nurtured among intellectuals in the western part of the country and in the diaspora with an outside influence. After the ‘second Maidan’, the national project began to develop as a ‘sanation’, i.e. a serious ‘clean-up’ of those forces that proved unprepared for the new post-Maidan status quo.²⁴ Secondly, while Western authors consider Crimea and Donbas the territories of Ukraine, the homogenisation of the ‘civic Ukrainian nation’ has been achieved through the withdrawal of residents of the peninsula and significant parts of the Donetsk, Lugansk, Zaporozhye and Kherson Oblasts. Western authors may not agree with their motivation, but it is clear that these people do not want to participate in the ‘renewed’ Ukrainian project after the two Maidans. Thirdly, according to the UN, as of the end of February, 2023 the number of refugees from Ukraine was more than 8 million, with 2.8 million people moving to Russia, more than in any of the European Union countries.²⁵

²³ Motyl A. IS LOSING CRIMEA A LOSS? WHAT RUSSIA CAN EXPECT IN UKRAINE'S RUST BELT //Foreign Affairs.2014, March 10 // <https://www.foreignaffairs.com/articles/russian-federation/2014-03-10/losing-crimea-loss>

Francis Fukuyama on Ukraine, liberalism and identity politics // <https://www.spectator.co.uk/article/francis-fukuyama-on-liberalism-ukraine-and-identity-politics/>

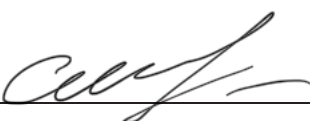
²⁴ Gushchin A.V., Markedonov S.M., Tsibulina A.N. THE UKRAINIAN CHALLENGE FOR RUSSIA. Moscow, Spetskniga, 2015. 48 p.

²⁵ Ukraine refugee situation // <https://data.unhcr.org/en/situations/ukraine>.

VI. EXPERT DECLARATION

38. I confirm that all the matters in respect of which I have stated my opinion are within my area of expertise and competence.
39. I understand that it is my duty to assist the ICJ in deciding the issues in respect of which this Report has been prepared. I have complied with, and will continue to comply with, that duty.
40. I confirm that the conclusions I have reached in this Report are unbiased, objective and impartial; they have not been influenced by the pressures of the proceedings or by any of the parties to the proceedings.

Expert



Sergey Miroslavovich Markedonov

Moscow, 8 March 2023

Annex 22

Witness Statement of Alexei Gayarovich Zhafyarov, 28 February 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

**WITNESS STATEMENT
OF ALEXEY GAYAROVICH ZHAFYAROV**

28 FEBRUARY 2023

1. I, Alexei Gayarovich Zhafyarov, submit this witness statement in relation to the issues of countering extremism in the Russian Federation that were raised in Ukraine's Reply to the Counter-Memorial of the Russian Federation in the proceedings before the International Court of Justice.
2. Since 2006, I have been deputy head of the department for supervising the implementation of the law on federal security, inter-ethnic relations and combating extremism and terrorism of the Prosecutor General's Office of the Russian Federation. Before 2006, I held various positions in the bodies of the Ministry of Justice of the Russian Federation and the Judicial Department of the Supreme Court of the Russian Federation. For most of my career I have dealt with issues directly related to countering extremist organisations.

A. LAWS ON EXTREMISM

3. In the Russian Federation, Federal Law No. 114-FZ "On Countering Extremist Activity" dated 25 July 2002 (hereinafter the "Law No. 114-FZ") has been in force since 2002. I was not among the drafters of the original text of the aforementioned law, but I am very well familiar with the practice of its application since 2002 and actively participated in the formation of this law enforcement practice by the Prosecutor General's Office of the Russian Federation.
4. Law No. 114-FZ is a framework law: its provisions are further developed through the application of other legislative acts, including the Code of Administrative Offences of the Russian Federation (hereinafter the "CAO") and the Criminal Code of the Russian Federation (hereinafter the "Criminal Code"). Most of the measures taken by the state authorities to implement this law are prophylactic and preventive. They are primarily aimed at eliminating the causes and conditions leading to manifestation of extremism. I consider the preventive measures of extremism legislation in more detail below.
5. Direct prosecution of those involved in extremism is not regulated by Law No. 114-FZ but by criminal legislation, whose provisions have been substantially relaxed by the legislator since 2002. For example, criminal prosecution for incitement to extremism is currently only permissible where softer preventive measures fail to produce the desired effect, for instance, when violence, threats of violence or the offender is a repeater.

6. Since the beginning of the application of the Law No. 114-FZ, it was primarily members of neo-Nazi and radical nationalist movements, including radical Russian nationalists, and members of radical pseudo-religious organisations who were held criminally liable for extremism. Criminal proceedings were generally brought under article 282 of the Russian Criminal Code (Incitement of Hatred or Enmity). In the early years of the application of the Law No. 114-FZ, a number of Russian nationalist organisations were declared extremist, such as the Religious group Krasnodar Orthodox Slavic Community “VEK RA” (Vedic Culture of Russian Aryans) of the Scythian Vesi Russeniya”, Ryazan city non-governmental patriotic organisation “Russian National Unity”, International Public Association “National Socialist Society”, Primorye Region Human Rights Non-Governmental Organisation “Union of Slavs”, “Interregional Social Movement “Slavic Union”, Interregional Public Association “Spiritual and Patrimonial Power of Rus” and others.

7. Thanks to the effective work of law enforcement agencies, the number of crimes covered by this article has decreased substantially. As I pointed out above, in 2018 article 282 of the Criminal Code were partially decriminalized: actions aimed at inciting hatred or enmity, as well as at disparagement of a person or group of persons on the grounds of gender, race, nationality, language, origin, attitude towards religion or membership of any social group, committed in public, are now by default an administrative offence under Article 20.3.1 of the CAO. Criminal prosecution for such an act under Article 282 of the Criminal Code remains possible only in the presence of aggravating circumstances:
 - (a) if the offender has already been held administratively liable for incitement to extremism but then reoffends within a year thereafter;
 - (b) if the acts involved the use or threat of violence; or
 - (c) if the acts were committed through abuse of official position or by an organized group.

B. THE YEAR 2013 CHANGES

8. In December 2013, Article 280.1 was added to the Criminal Code, which prohibited calls for violation of the territorial integrity of the Russian Federation. I was involved in the drafting of this article and I know the purpose of this provision: it was combating acts

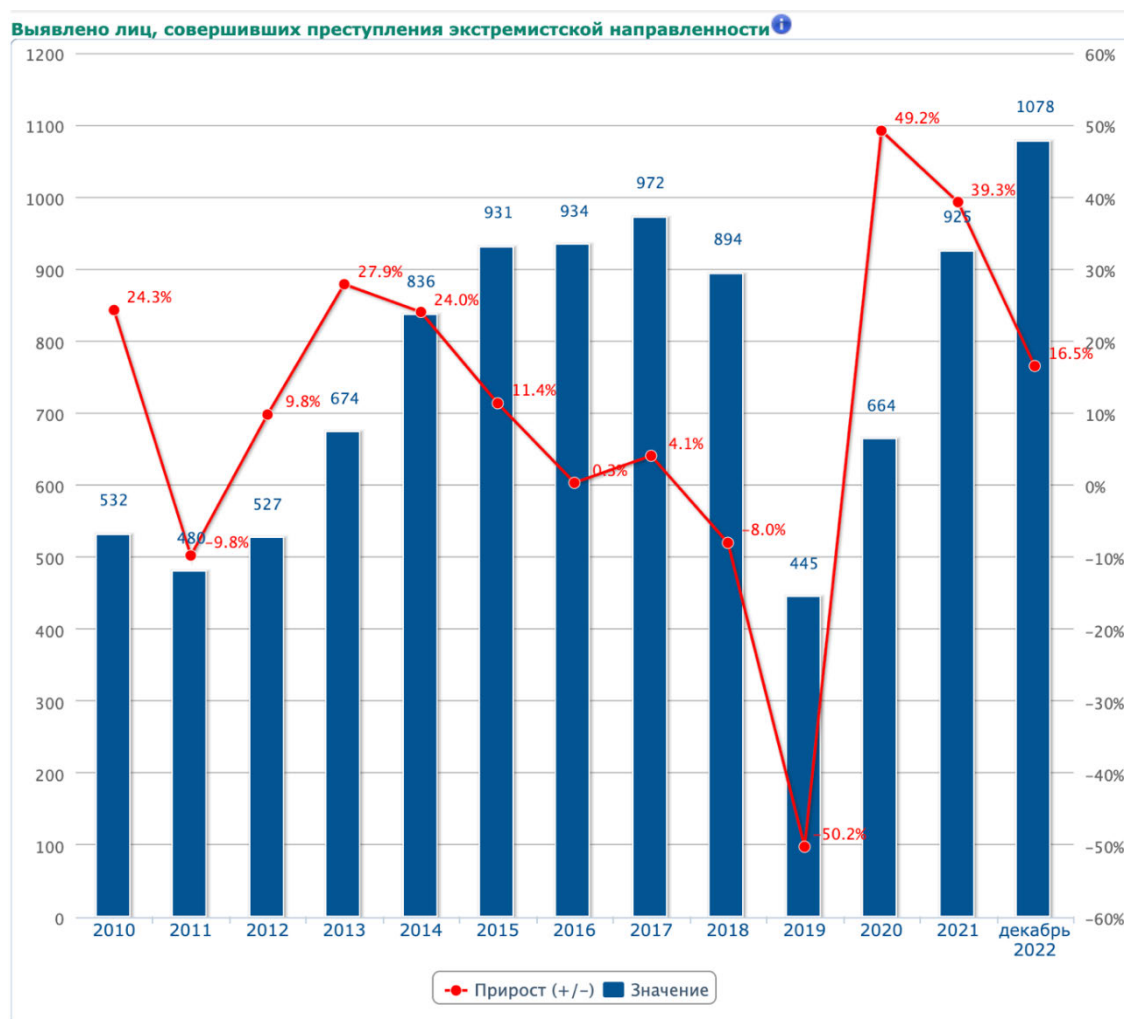
aimed at infringing on the territorial integrity of the Russian Federation. This article could in no way be related to Crimea in 2013.

9. The law introducing Article 280.1 into the Russian Criminal Code was adopted in an expedited manner because of a sudden and serious threat to the security of the Russian state. In 2013, separatist groups that advocate the violation of the territorial integrity of the Russian Federation began to appear en masse on various internet sites, mainly on social networks.
10. The most prominent were the so-called social movements:
 - (a) “Free Idel-Ural”, whose members had a mission that consisted in unlawful seizure of the territories of the Republics of Tatarstan, Udmurtia, Bashkortostan, Mari-El, Chuvashia and Mordovia from the Russian Federation;
 - (b) “Crimson Wedge – Independent Kuban”, whose members had a mission that consisted in unlawful seizure of the territories of Krasnodar Krai, Rostov Oblast, Adygea, Stavropol Krai and Karachay-Cherkessia from the Russian Federation and who were hiding their intentions behind discussions regarding the creation of a certain “Kuban People’s Republic”;
 - (c) “March for the Federalisation of Siberia” whose participants sought to illegally alienate a number of Siberian regions from the Russian Federation, disguising their illegal activities by organising supposedly peaceful rallies and marches in Siberian cities; and
 - (d) “Stop Feeding Moscow” movement, whose participants sought to illegally alienate a number of regions of the Urals and Siberia from the Russian Federation, under the guise of pseudo-socialist slogans.
11. These movements were coordinated via relevant Internet portals and communities in social networks by a small group of activists who had previously left the territory of the Russian Federation and may have been recruited by special services of foreign states interested in destabilising the situation in the Russian Federation.
12. The emergence of these groups, whose activities posed a serious threat to the public order and security, as well as the territorial integrity of the Russian Federation, required urgent

amendments to the laws on extremism. Given the absence of an article in the Criminal Code that would directly prohibit calls for violation of the territorial integrity of the Russian Federation, the General Prosecutor's Office of the Russian Federation did not have the necessary authority to prohibit the dissemination of information about these groups on the Internet, including ordering the owners of web resources and social networks to remove the relevant information, or ordering telecommunications operators to restrict access to the relevant web pages. This was a real threat to the territorial integrity of the Russian Federation and required the adoption of measures, including preventive ones. In other words, Article 280.1 of the Criminal Code was necessary to counter extremist activities and block access to the relevant web sites and groups in social networks, which pose a significant threat to the public order and the security of the Russian Federation.

13. In practical terms, the criminalisation of calls for violation of the territorial integrity has yielded positive results to the Russian Federation. In the early years of the rule application, the General Prosecutor's Office of the Russian Federation successfully managed to remove several thousand links to web resources per year. Currently, the number of links that are removed every year is much lower.
14. The law enforcement practice of the Prosecutor General's Office of the Russian Federation in the area of blocking Internet resources is organised in full accordance with the requirements of the Constitutional Court of the Russian Federation, in particular that any measures of state coercion must:
 - (a) on the one hand, differentiate legal responsibility according to the gravity of the act, the amount and nature of the damage caused, the degree of culpability of the offender and the nature and degree of public danger of the offences;
 - (b) on the other hand, have a reasonable deterrent effect necessary to ensure compliance with the precepts protected by administrative tort law.
15. For example, if calls to violate the territorial integrity of the Russian Federation were contained only on one page of an Internet resource, the Prosecutor General's Office of the Russian Federation demanded that access to that particular page, and not to the entire Internet resource, be blocked.

16. Thanks to the preventive and proactive measures taken, extremist movements whose activities were aimed at violating the territorial integrity of the Russian Federation have been prevented from gaining popularity in the Russian segment of the Internet: the blocking has prevented search for like-minded individuals for these movements, cut off communications and stopped the spread of the movements in the Russian media space and prevented the transformation of such groups into organisations with an established hierarchy.
17. The adoption of this amendment, as well as the systematic combating of extremist activities, has significantly reduced the number of people involved in extremist activities. This is clearly demonstrated by official statistics. According to statistics from the Prosecutor General’s Office of the Russian Federation, by 2015, the law enforcement agencies managed to stop the “explosive” growth (25% per year) in the number of those who committed extremism crimes in the Russian Federation:



*** Number of persons who committed extremism crimes**



Moreover, official statistics show that even after the reunification of Crimea with the Russian Federation, there has not been a significant increase in extremist crimes.



- 18. With regard to the criminal prosecution, the number of prosecutions initiated and brought to trial under Article 280.1 of the Criminal Code was rather low. From 2013 to 2022, only 121 crimes under Article 280.1 of the Criminal Code were registered, while in 2021 and 2022 there were none.

C. PREVENTIVE MEASURES

19. In terms of the correlation between prevention measures and criminal prosecution measures, Russia's model of countering extremist activity differs from the American one. This model to which the Russian Federation adheres focuses on both prevention and suppression of the spread of radical ideas. This helps prevent the transition from non-violent forms of extremism to violent ones and reduces the need for criminal measures.
20. For example, the Russian law on extremism grants the bodies of the General Prosecutor's Office of the Russian Federation the power to issue the following to non-governmental and religious organisations:
 - (a) warnings not to engage in extremist activities, if there is information about unlawful acts being prepared; and
 - (b) a written warning on the discovery of facts demonstrating that the organisation's activities show signs of extremism.
21. These preventive measures are much less severe than the instantaneous ban of the organisation concerned and do not involve criminal prosecution of its members and leaders. Subsequent measures are only taken if the organisation fails to comply with the warning or commits other acts showing signs of extremism within one year from the date of receipt of the warning. Accordingly, such measures are aimed at preventing the commission of extremist offences.
22. Furthermore, issuing a warning or commits balances the interests of the society as a whole and those of the specific organisation, as bona fide organisations are granted the opportunity to bring their activities into line with the laws on extremism and to appeal the warning or commits in court in order to ensure an independent and transparent check of the reasonableness of them. Thus, the lawfulness and validity of warnings and commits issued by officials of the Procurator-General's Office of the Russian Federation and the procurator's offices of the entities of the Russian Federation may be reviewed by courts of several instances: in the trial court, in the court of appeal, in the court of cassation and in the Supreme Court of the Russian Federation under the supervisory procedure.
23. Given that an appeal can be lodged, the General Prosecutor's Office of the Russian Federation carefully reviews all the evidence before issuing a warning or commits in each

particular case and ensures strict compliance with the procedural rules in their issuing. The addressees of warnings and commits on the impermissibility of extremist activity have the possibility of appealing against them in court.

D. PROHIBITION OF AZOV REGIMENT

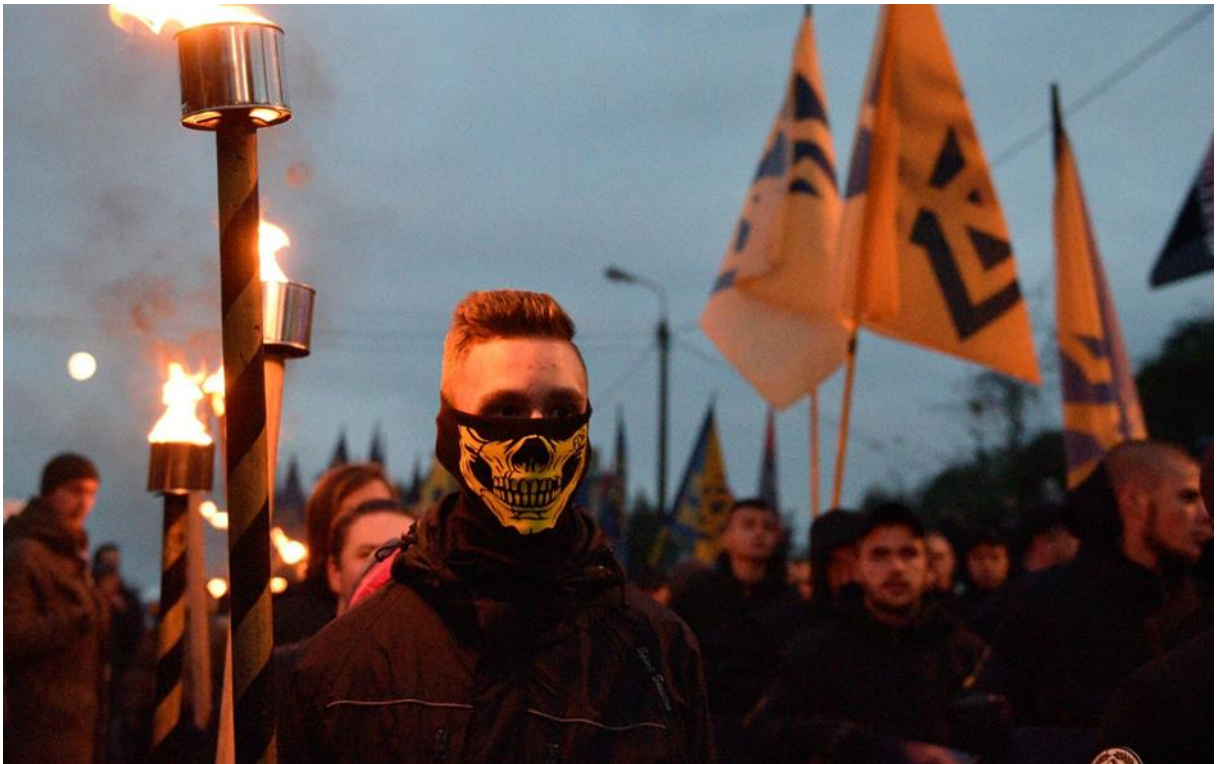
24. As a recent example of the fight against extremism in the Russian Federation, I can cite the prohibition of the Ukrainian paramilitary nationalist association Azov, also known as “Azov Battalion” or “Azov Regiment”.
25. Azov association was established in May 2014 by members of various radical groups who held radical far-right and neo-Nazi views. The ideology of this association was based on Nazi ideology prohibited by judgments of the International Military Tribunal in Nuremberg. In particular, members of Azov used Nazi paraphernalia and symbols, including swastika tattoos, chevrons similar to the German Wolfsangel, and the books *Mein Kampf*:





26. In addition, members of the Azov association have publicly expressed racist slogans, held anti-Russian marches, including with torches similar to Nazi marches in the Third Reich and modern neo-Nazi events, and committed other actions aimed at inciting hatred against the Russian and Russian-speaking population of Donbas.
27. For example, on 22 October 2015 and on 20 October 2015, Azov fighters held processions and ceremonies that looked similar to the “roll call of the dead” or “last roll call” ceremonies held by members of the Nazi Party on the Memorial Day of the Fallen Heroes of the Nazi Party in Germany (on the day the “beer putsch” began – 08 November 1923). The number of participants in these marches was over a thousand and five thousand fighters respectively. In particular, during the first procession, the fighters of Azov lined up on the football field and then moved with torches, flags and symbols of Azov, finishing the procession in front of the regiment’s base, where a memorial sign to the dead Azov soldiers in the form of a mound with three swords stuck in it was erected. Then in front of it were lined up 33 Azov fighters, symbolising the 33 dead, with shields on which the call sign of the dead was written in runic script, and after his name was called, the fighter raised his shield and said “In formation!”.





28. During its marches, rallies and concerts, Azov unashamedly replicated the vocabulary, symbols and rituals of the Third Reich, broadcasting videos of German stormtroopers diving, firing tanks decorated with runes and German crosses, videos of SS marches

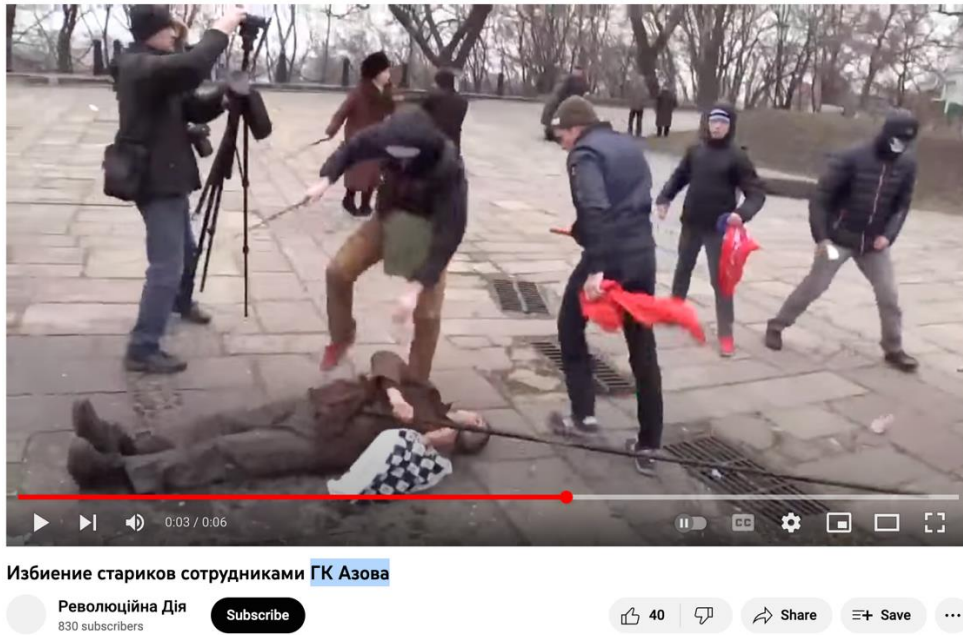
including fighters from their eastern units, alternating with images of wolves and werewolves. Participants in such actions often displayed Nazi salutes with their right hands raised. There are obvious similarities between this symbolism and rituals of the Azov regiment and those of the contemporary neo-Nazi movements:





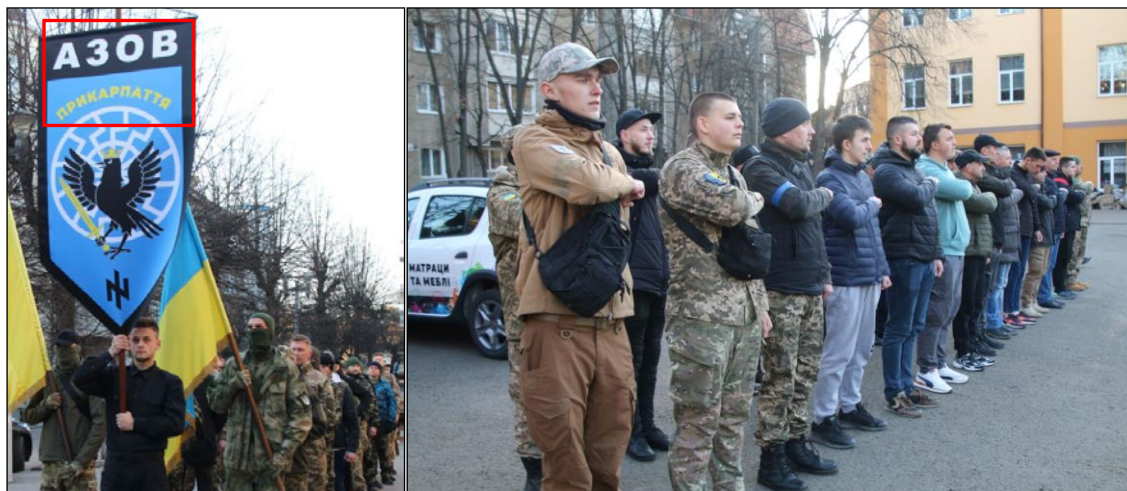
29. Finally, Azov members have staged fights and pogroms against fans with a black skin, Communist party supporters and the pro-Russian population of Ukraine. It is not uncommon for them to post video recordings of their actions. For example, Azov activists are known to have been involved in the 20 October 2015 beating of two fans with a black skin who entered the stands of the Dynamo stadium in Kyiv during a match between FC Dynamo (Kiev) and Chelsea. On 17 March 2016, members of the Azov Civil Corps attacked a picket of the Progressive Socialist Party of Ukraine in central Kiev, whose participants were mostly elderly people.





30. Instead of suppressing the activities of Azov association, the Ukrainian law-enforcement authorities and security agencies supported it and turned it into a paramilitary unit by incorporating the Azov Regiment into the Ukrainian National Guard and providing it with military equipment and heavy weaponry for use against the population of Donbas. High-ranking Ukrainian law enforcement officials spoke flatteringly of Azov: in particular, the head of the Department for Combating Drug Crimes of the National Police of Ukraine, Ilya Kiva, called it “a fighting regiment for the purity of the Ukrainian nation”.
31. During combat activity since 2014 by the armed forces of the Kiev regime against residents of south-eastern Ukraine, fighters of the Azov Regiment committed mass crimes against the Russian-speaking population, persecuting them on the basis of their language. The commission of such crimes by the Azov Regiment continues, unfortunately, to this day. Thus, the General Prosecutor’s Office of the Russian Federation has documented numerous instances where civilians were held hostage and used as human shields.
32. In addition, Azov leaders attempted to commit terrorist acts in Crimea and organised attacks at governmental and religious institutions of the Republic of Crimea.
33. In 2016, one of Azov’s leaders, Andriy Biletsky, formed the political party National Corps for the direct participation of the Azov association in Ukraine’s popularly elected bodies. Leaders of the National Corps party organise and carry out recruitment of

individual Azov regiment battalions across Ukraine (e.g. Azov-Prykarpattia and Azov-Poltava), as well as public rallies of nationalists taking the “oath”.



34. In addition, Azov has attempted to recruit Russian citizens in the Russian Federation to join its ranks for combat operations in the Donbass. For this purpose, Azov activists organized an extremist group “Mizanthropik Division” in the Internet messenger “Telegram”, which sanctified actions in support of the Azov regiment and organized the posting of flyers and banners in the Russian Federation. In August 2022, the Supreme Court of the Russian Federation examined an application of the General Prosecutor’s Office of the Russian Federation and the facts referred to above and on their basis declared the organisation a terrorist organisation and prohibited its activity on the territory of the Russian Federation.¹

E. NO RACIAL DISCRIMINATION IN THE FIGHT AGAINST EXTREMISM

35. As part of my work at the General Prosecutor’s Office of the Russian Federation, I have been involved in international cooperation on countering extremism. Specifically, I was a member of the Russian Federation delegations at meetings of the Organisation for Security and Cooperation in Europe. At no such platform for international cooperation has the issue ever been raised that the Russian model for countering extremism is allegedly discriminatory in general or with regard to any ethnic or national group or otherwise violates the prohibition of racial discrimination imposed by the Convention on the Elimination of All Forms of Racial Discrimination. I am not aware of any instances

¹ Supreme Court of the Russian Federation, Decision, No. AKPI22-411S, 2 August 2022.

in which the Russian practice of combatting extremism has been criticized internationally as discriminatory, including in relation to Ukrainians or Crimean Tatars living on the territory of the peninsula of Crimea.

36. One of the key objectives of Russian legislation on extremism is the prevention of social, racial, national or religious discord. Any possible restrictions on rights, including the right to freedom of movement or freedom of expression under Law No. 114-FZ are aimed at ensuring national security of the Russian Federation and preventing manifestations of, inter alia, racial or other discrimination. Accordingly, it would be highly incorrect to view the anti-extremist restrictions in Law No. 114-FZ as violating the prohibition of racial discrimination.
37. The Constitutional Court of the Russian Federation has repeatedly pointed out that Law No. 114-FZ complies with the Constitution of the Russian Federation and the standards for the protection of human and civil rights and freedoms as its application takes into account the rights and freedoms guaranteed by international legal acts:
 - (a) The need to legally restrict freedom of expression, assembly and association for the purpose of countering extremism is also highlighted in the Parliamentary Assembly of the Council of Europe Resolution 1344 (2003) on “Threats to Democracy by Extremist Parties and Movements in Europe”, stressing that, regardless of its nature, extremism is a form of political activity which denies, explicitly or implicitly, the principles of parliamentary democracy and is based on ideologies and practices of intolerance, exclusion, xenophobia, anti-Semitism and ultra-nationalism (para 3), and the tendency of some extremist movements to find justification for their actions in religion carries a double danger: on the one hand, it fosters intolerance, religious fanaticism and fundamentalism and, on the other hand, leads to the isolation of entire religious communities because of individuals who abuse the universal values of religion (Ruling of the Constitutional Court of the Russian Federation dated 2 July 2013 No. 1053-O).
 - (b) If a citizen, while exercising his constitutional rights and freedoms (including freedom of thought and speech, freedom of creativity, the right to hold and disseminate beliefs and to act in accordance with them), violates the rights and freedoms of others and such violation (whether directed against specific individuals

or against public order in general) is socially dangerous and unlawful, the offender may be held liable under public law (including criminal law), which aims to protect public interests (Ruling of the Constitutional Court of the Russian Federation dated 27 October 2015 No. 2450-O).

- (c) Court-ordered confiscation of information materials deemed extremist by a prosecutor is not linked to liability, is not a sanction (punishment) for the offence, but is essentially a special measure of state counteraction to extremism aimed at preventing extremist activity, including by identifying and subsequently eliminating the causes and conditions that contribute to it (Ruling of the Constitutional Court of the Russian Federation dated 02 July 2013 No. 1053-O).
 - (d) Extremist activities, being addressed to the mass consciousness or the attention of certain segments of society, segmented by religious, ethnic and other characteristics, and aimed at forming an environment of acceptability of terrorist ideology and even desirability of its implementation in public practice, also create a need for adequate and effective measures of preventive nature (Ruling of the Constitutional Court of the Russian Federation dated 21 September 2017 No. 1797-O).
38. Although the Committee on the Elimination of Racial Discrimination (hereinafter the “Committee”) expressed general concern that the provisions of the Law No. 114-FZ were, in their view, broad and can potentially be used randomly, this comment was hypothetical and the Committee did not state that the law was applied in such way, nor did the Committee mention that the law in question has ever been applied against any ethnic groups or national minorities.
39. In my view, the Committee expressed only general concern, as it was not aware the direct implementation of Law No. 114-FZ in practice, with a focus primarily at prevention while the sanctions for breaches of the law are primarily administrative in nature (e.g. a fine) without the imposition of criminal liability. Furthermore, the Committee had probably not been informed that the wording of the Law No. 114-FZ it analysed is subsequently made more specific in other laws, including the CAO and the Criminal Code and in law enforcement practice, which precludes broad and the more so arbitrary interpretation of the law.

40. Thus, between 2016 and 2018, the Plenum of the Supreme Court of the Russian Federation provided a number of clarifications on the practice of application of the legislation on extremism, which further specified its wording and its correlation with human and civil rights and freedoms:
- (a) Considering criminal cases on extremism-related crimes, courts shall take into account the rights and freedoms guaranteed by the Constitution of the Russian Federation and international legal acts, such as freedom of conscience and religion, freedom of thought, speech and mass information, the right to freely seek, receive, transmit, produce and disseminate information by any lawful means, the right to assemble peacefully, without weapons, to hold meetings, rallies and demonstrations, marches and pickets (para. 1 of the Resolution of the Plenum of the Supreme Court of the Russian Federation dated 28 June 2011 No. 11 as amended by the Resolution dated 20 September 2018 No. 32).
 - (b) The said rights and freedoms may only be restricted in exceptional cases expressly set out in federal law to the extent necessary in a democratic society in order to protect the foundations of the constitutional order, morality, health, rights and lawful interests of other persons, to ensure the country's defence and security, public order and territorial integrity (para. 1 of the Resolution of the Plenum of the Supreme Court of the Russian Federation dated 28 June 2011 No. 11, as amended by the Resolution dated 20 September 2018 No. 32).
 - (c) Courts must proceed from the nature and degree of public danger of the act and take into account that an act, although formally containing elements of a criminal offence, does not constitute a crime, but does not pose a public danger due to its insignificance, for example, taking into account the size and composition of the audience, the number of views and the influence of extremist information on the behaviour of the persons comprising that audience (para. 8.1 of the Resolution of the Plenum of the Supreme Court of the Russian Federation dated 28 June 2011 No. 11, as amended by the Resolution dated 20 September 2018 No. 32).
 - (d) Courts must ensure that sentences imposed on persons found guilty of extremist offences are individualised, for example, by ascertaining and taking into account the conditions of the minor's life and upbringing, the level of mental development,

other personal characteristics, and the influence of older persons on the minor (para. 24 of the Resolution of the Plenum of the Supreme Court of the Russian Federation dated 28 June 2011 No. 11).

41. The Russian laws on extremism are applied uniformly on the territory of all constituent entities of the Russian Federation. They began to take shape long before the reunification of Crimea with Russia in 2014 and continue to be developed now, having a delayed positive effect in guaranteeing a stable rule of law and development of justice. That said, after the reunification of Crimea with the Russian Federation, the organisations who were operating in the territory of Crimea were even provided with more favourable conditions compared to organisations operating in other Russian regions, to ensure their smooth transition to the legal framework of the Russian Federation.
42. One significant extremist threat in Crimea came from Hizb ut-Tahrir and Tablighi Jamaat organisations, which are banned in a number of states but have not been banned in Ukraine. For example, Hizb ut-Tahrir is banned in Bangladesh, Germany, Indonesia and a number of Arab states. The ideological basis of these organisations is radical pseudo-religious ideas falsely presented as branches in Islam. These organisations are, in turn, breeding grounds for recruiters of terrorist organisations, including ISIS which is a terrorist organisation banned in the Russian Federation. As the majority of Crimean Tatars in Crimea are Muslims, measures to combat such organisations may legitimately affect the Crimean Tatars who, along with other persons, profess Islam and are members of such organisations.
43. However, given that these organizations were not banned when Crimea was part of Ukraine, after the accession of the peninsula to the Russian Federation, members of these organizations living in Crimea were not prosecuted for participation in the activities of an extremist organization for a long time. They were given a year to voluntarily renounce participation in the banned organizations. There was also a moratorium on the seizure of extremist materials by law enforcement agencies in Crimea, so that their owners could voluntarily surrender the banned literature and avoid prosecution.
44. As for the Mejlis, which is banned in the Russian Federation, they, as stated in the Appellate Ruling of the Supreme Court of the Russian Federation dated 29 September 2016, were declared an extremist organisation in view of the fact that they organised and

performed acts of violence to block the operation of the border control post on 03 May 2014 and were carrying out the blockade of Crimea, which resulted in power supply and communication equipment disconnection on the peninsula. Despite this, the Russian law enforcement authorities have not yet initiated any criminal proceedings on the grounds of membership of the said organisation.

F. CONCLUSION

45. Thus, it can be concluded that Russian laws on extremism do not discriminate against any ethnic or national group and do not allow for excessive or arbitrary criminal prosecution; they provide primarily preventive and proactive measures and are driven exclusively by the fight of the State against radical manifestations of extremism, such as terrorist activities of the Azov organisation.
46. I hereby certify that to the best of my knowledge and belief the information set out in this witness statement is correct.

Witness

Alexey Gayarovich Zhafyarov

Moscow, 28 February 2023

Annex 23

Second Witness Statement of [REDACTED], 7 March 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

SECOND WITNESS STATEMENT
OF [REDACTED]

7 MARCH 2023

A. INTRODUCTION

1. I, [REDACTED], have previously given witness statement in the proceedings initiated by Ukraine before the International Court of Justice (hereinafter, “First Witness Statement”). I covered in them, among others, the following topics:
 - (a) The process of listing the Khan’s Palace as a UNESCO World Heritage Site;
 - (b) The state of the Khan's Palace, which required urgent restoration work;
 - (c) Progress of repair and restoration works at the Khan’s Palace.
2. I have familiarized myself with the content of the Ukraine Reply to the Counter-Memorial of the Russian Federation (hereinafter, “Reply”). I believe that Ukraine has not presented any arguments or evidence that would refute my witness statement. Moreover, Ukraine has simply ignored a significant number of the facts I mentioned, and with regard to the rest it makes unsubstantiated or contradictory allegations.
3. I have prepared a new witness statement (hereinafter, “Second Witness Statement”) in order to give detailed comments on Ukraine's arguments.

B. INTERACTION WITH UNESCO

4. Ukraine claims that UNESCO representatives are allegedly unable to enter the territory of the Khan’s Palace ensemble.¹
5. I have read excerpts from the UNESCO document² to which Ukraine refers as supporting the above argument, and must note that the information about the inability to enter Crimea relates to the activities of another organization, namely the UN Human Rights Monitoring Mission in Ukraine,³ but not UNESCO.
6. Therefore, my explanation that the Bakhchisaray Historic, Cultural and Archeological Museum and Reserve (hereinafter, “Museum-Reserve”) does not restrict UNESCO

¹ Reply, ¶648.

² Implementation of decisions and resolutions adopted by the Executive Board and the General Conference at previous sessions thereof, Doc. No. 207 EX/5.I.C (13 September 2019). Ukraine refers to this document in ¶648 of the Reply.

³ See *Ibid.*, ¶21.

representatives' access to the Khan's Palace⁴ has not been refuted. On the contrary, as I pointed out in my First Witness Statement, not only do we not prevent UNESCO representatives from visiting the Khan's Palace, but we would be happy to see them and continue our cooperation⁵.

C. STATUS OF RESTORATION WORKS AT THE KHAN'S PALACE FACILITIES BEFORE 2014

7. Ukraine's claims that there were active restoration works going on in the Khan's Palace before 2014 are quite unsubstantiated. Ukraine has not commented in any way on the documents I quoted indicating the unsatisfactory condition of the Khan's Mosque in 1989, 2003, 2010, and 2013.⁶ I managed to find only a reference to the letter of the national (Ukrainian) coordinator of the International Centre for the Study of the Preservation and Restoration of Cultural Property (hereinafter, "National Coordinator Letter").⁷ According to Ukraine, he allegedly studied the materials of scientific research of the Khan's Palace for 1960, 1962, 1965, 1987, 1988, 1994 "and subsequent years", prepared by the UkrNIIproyektrestavratsia Institute, as well as a large number of photographs and description of works in progress⁸ (here I must note that I do not understand how it conforms with the statement of Ukraine that it is denied the opportunity to obtain detailed information about the progress of such works).⁹
8. From the contents of the letter, which draws general conclusions regarding the "high level of decisions taken" on the conservation, restoration and rehabilitation of historic building elements, it is not possible to ascertain what specific work was carried out, in what year, or on what grounds. Even the aforementioned scientific research materials are not attached to either the letter or the Reply, so I cannot comment on them substantively. However, I find it difficult to imagine what kind of high level we are talking about here. For example, the author points out that he got acquainted with the research performed by

⁴ First Witness Statement, ¶14.

⁵ Crimean Newswire, *Crimean Ministry of Culture Invites UNESCO Experts to Personally Assess Cultural Development on Peninsula* (18 September 2017), available at: <https://crimea-news.com/culture/2017/09/18/324396.html> (Exhibit A).

⁶ See First Witness Statement, ¶¶21-26.

⁷ Letter of the National Coordinator of the ICCROM in Ukraine No.12 (27 April 2018). Annex 1030 to the Memorial.

⁸ *Ibid.*

⁹ Reply, ¶648

UkrNIIProyektrestavratsia in 1988. However, documents prepared by the same organisation in the following, 1989, year, clearly indicate the poor condition in which the mosque found itself then: they observed roof beam deflection, rotten lining, systematic wetting of wooden structures of the east façade, etc.¹⁰

9. Claims of “active work” by UkrNIIProyektrestavratsia on the Khan’s Palace are in turn supported only by a link to an internet resource that repeats the arguments of Ukraine (with the content of which I strongly disagree), but provides no real evidence whatsoever.¹¹
10. Accordingly, the claims of a “high level of decision-making” regarding the restoration and preservation of the Khan’s Mosque in the pre-2014 period appear unsubstantiated to me.

D. PROGRESS OF REPAIR AND RESTORATION WORKS AT THE KHAN’S PALACE FACILITIES

11. Ukraine has made a number of statements regarding the progress of restoration works at the Khan’s Palace facilities that I would also like to comment on, as I do not consider them to be corresponding to reality.
12. First, Ukraine claims that only a small part of the beams of the Khan’s Mosque needed to be replaced.¹² I cannot assess this claim due to the fact that, as far as I can see, Ukraine has been unable to back it up in any way. This is particularly surprising in light of the fact that, judging by the Letter of the National Coordinator, the documents on the study of the Khan’s Mosque have not been lost and the National Coordinator himself, as confirmed by publicly available data,¹³ was UkrNIIProyektrestavratsia’s director from 1983 to 2010.
13. Second, as I pointed out in the First Witness Statement, the decision to replace the beams was prompted by their infestation with rot, fungi and insects (which could spread to the rest of the wooden structures of the Khan’s Mosque) as well as their substantial wear and

¹⁰ First Witness Statement, ¶21.

¹¹ Reply, ¶654.

¹² Reply, ¶654.

¹³ Wikipedia, *Antoniuk, Anatoly Evdokimovich*, available at: https://ru.wikipedia.org/wiki/Антонюк,_Анатолий_Евдокимович (Exhibit B)

deterioration in strength.¹⁴ That is why it was decided to dismantle the beams, remove the damaged elements from them and, if possible, use that material in the restoration of other objects. At present, the beams are stored on the territory of the Salachik historical and archaeological complex under round-the-clock guard.

14. Third, I am also surprised that Ukraine has ignored the considerations I made in the First Witness Statement about the primary need to ensure the safety of people. The mosque is a functioning facility and regularly visited by believers, as well as by Museum-Reserve employees and tourists. It would be inadmissible to endanger their lives and health.
15. Fourth, as far as I can judge, Ukraine has completely ignored my claim that the original “Tatarka” roof tiles covering the Khan’s Mosque were completely replaced as early as in 1967. Also, despite the fact that I pointed out in the First Witness Statement that all the tiles removed from the roof had been transferred to the funds of the Museum-Reserve, Ukraine claims that they were destroyed.¹⁵ This is obviously untrue. They were used in the reconstruction of other facilities of the Khan’s Palace ensemble: The Sary-Guzel Bathhouse, The Stable Pavilion, and The Library Pavilion.
16. Fifth, Ukraine claims that the interior of the Khan’s Mosque was damaged due to the lack of protection from the weather.¹⁶ In fact, however, the interior of the Mosque was protected by a temporary shelter during the works. The only incident of weather-related wetting was when rain fell inside the mosque through an installation opening made in the temporary shelter above the central part of the mosque. I described that incident in the First Witness Statement.¹⁷ However, only the floor got soaked, while the inside of the mosque walls was not affected and waterproof insulation was restored in less than three days.
17. Sixth, it is worth pointing out separately that Ukraine does not provide any support for the claim that restoration works are not usually carried out in winter time. As I already noted in the first witness statement, the works were carried out in accordance with the agreed schedule. I am not aware of the extent to which it constitutes standard practice in

¹⁴ First Witness Statement, ¶¶32-34.

¹⁵ Reply, ¶649.

¹⁶ *Ibid.*

¹⁷ First Witness Statement, ¶43.

general; however, I have read news reports that, for example, restoration works of the Notre Dame Cathedral were due to start in winter time.¹⁸

18. Seventh, Ukraine claims that due to the use of improper cleaning technology using high pressure washing equipment cracks formed on the wall.¹⁹ This claim is unsubstantiated. As far as I know, during the works at the Khan's Palace only gentle low-pressure water cleaning methods were used, only fragmentarily at that and only on the Soviet-era plaster layer whose microcracks had been identified earlier due to partial deformation of the foundations and walls.

E. OTHER OBSERVATIONS

19. To conclude my Second Witness Statement, I would like to share a few observations.
20. First, I noticed that in the Reply, Ukraine alleges the “destruction” of the Khan's Palace, although almost all of its claims refer to the works carried out on the Khan's Mosque. However, as I pointed out in my first witness statement, the ensemble of the Khan's Palace includes 17 facilities, many of which have been undergoing repair and restoration works up to this time, including the Stable Pavilion, the Library Pavilion, the Falcon Tower, the Main Building, the Harem Pavilion, the Khan's Kitchen, the Gardens and the Park Structures. The works on the Khan's Mosque have not been completed either. Some facilities are awaiting commissioning, works on some more have been completed. Moreover, as far as I am aware, prior to 2014 in the USSR and Ukraine only isolated repairs were made to some of facilities at Khan's Palace, while a full-scale complex restoration work was only commenced for the first time after reunification of Crimea with the Russian Federation. Clearly, works of such scale cannot but face some problems, but by now mechanisms of internal and public control have been implemented that allow to quickly react to, and resolve issues as they arise.
21. As to internal control over restoration of Khan's Palace facilities, staff of the Museum-Reserve daily visually inspect the works sites. At the end of each week of works we compile a report on completed works where all requests and objections are recorded as

¹⁸ See, e.g., RIA Novosti, *Paris Completes Reinforcement Work on Fire Damaged Notre-Dame* (18 September 2019, updated 19 September 2019), available at: <https://ria.ru/20210918/sobor-1750674763.html> (Exhibit C)

¹⁹ Reply, ¶649.

they accrue over visual inspections.²⁰ This report is then circulated to the Head of the Republic of Crimea, to the Muftiyat of the Republic of Crimea, Department of State Protection of Cultural Heritage of the Republic of Crimea and State Committee for Interethnic Relations of the Republic of Crimea.

22. As to public control, since the time of my First Witness Statement, public control of the repair and restoration works at the Khan's Palace has become even more stringent. A Public and Expert Council including restorers, architects, historians and engineers was set up in March 2022.²¹ The Council's tasks include monitoring of the performed works and consultations on the repair and restoration process.
23. Second, I would like to state separately that all the insinuations of Ukraine concerning my alleged lack of qualifications are unfounded.²² I have been working at [REDACTED], and I have been [REDACTED], so I have first-hand knowledge of the situation with the Khan's Palace²³.
24. However, I cannot say the same about the people to whose opinion Ukraine refers. Specifically, Ukraine cites in its Reply a statement of the Royal Institute of International Affairs, which allegedly expresses concern about the state of the Khan's Palace. However, I found on the Internet that the author of this statement is a Ukrainian lawyer specialising in international law²⁴ who is a former "associate member" of this organisation²⁵.
25. I hereby confirm that, to the best of my knowledge and beliefs, the information set out in this witness statement is true.

²⁰ See for example SBI RC Bakhchisaray Historical, Cultural and Archeological Museum-Reserve, Letter to the Head of the Republic of Crimea S. Aksyonov (Exhibit D).

²¹ Tavrida Muftiyat, *Khan's Palace Restoration to Be Monitored by Public Figures* (22 March 2022), available at: <https://qmdi.ru/za-restavracziej-hanskogo-dvorcza-budut-sledit-obshhestvenniki/> (Exhibit E)

²² See *Ibid.*

²³ CV of [REDACTED], Annex 1285 to the Counter-Memorial (CERD).

²⁴ National University of Kiev-Mohyla Academy, *Dr Kateryna Busol*, available at: <https://www.ukma.edu.ua/eng/index.php/studies/departments/faculty-of-law/international-law/staff/61-dr-kateryna-busol> (Exhibit F)

²⁵ Kateryna Busol, *Crimea's Occupation Exemplifies the Threat of Attacks on Cultural Heritage*, Chatham House (4 February 2020), available at: <https://www.chathamhouse.org/2020/02/crimeas-occupation-exemplifies-threat-attacks-cultural-heritage> (Exhibit G).

Witness

[Signature] _____



Bakhchisaray, 7 March 2023

LIST OF EXHIBITS

Number:	Name of exhibit:
Exhibit A	Crimean Newswire, <i>Crimean Ministry of Culture Invites UNESCO Experts to Personally Assess Cultural Development on Peninsula</i> (18 September 2017).
Exhibit B	Wikipedia, <i>Antoniuk, Anatoly Evdokimovich</i> .
Exhibit C	RIA Novosti, <i>Paris Completes Reinforcement Work on Fire Damaged Notre-Dame</i> (18 September 2019, updated 19 September 2019).
Exhibit D	SBI RC Bakhchisaray Historical, Cultural and Archeological Museum-Reserve, Letter to the Head of the Republic of Crimea S. Aksyonov.
Exhibit E	Tavrida Muftiyat, <i>Khan's Palace Restoration to Be Monitored by Public Figures</i> (22 March 2022).
Exhibit F	National University of Kiev-Mohyla Academy, <i>Dr Kateryna Busol</i> .
Exhibit G	Kateryna Busol, <i>Crimea's Occupation Exemplifies the Threat of Attacks on Cultural Heritage</i> , Chatham House (4 February 2020).

Exhibit A

Crimean Newswire, *Crimean Ministry of Culture Invites UNESCO Experts to Personally Assess Cultural Development on Peninsula* (18 September 2017)

(translation)

Translation

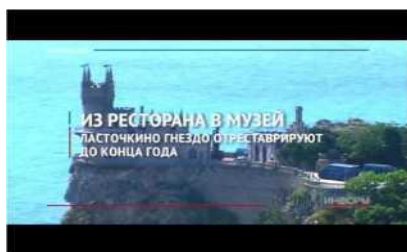
Crimean Newswire, *Crimean Ministry of Culture Invites UNESCO Experts to Personally Assess Cultural Development on Peninsula* (18 September 2018), available at: <https://crimea-news.com/culture/2017/09/18/324396.html>.

Crimean Newswire

Crimean Ministry of Culture Invites UNESCO Experts to Personally Assess Cultural Development on Peninsula

18 September 2017 at 05:38 PM

Culture



Simferopol, 18 September. *Kryminform*. **Arina Novoselskaya**, Minister of Culture of Crimea, invited UNESCO representatives to personally visit the peninsula for an objective assessment of the state of its cultural and historical heritage sites. She did so in response to an Ukrainian report describing the condition of the Crimean cultural sites presented to UNESCO.

“We are open. If there is such an initiative (for UNESCO representatives to visit Crimea), we will be happy to open the doors of our museums and nature reserves, to show how much they have improved, how they have become better off, what salaries museum staff get, and what additions have been made to museum collections. We will be happy to do so to help them make an objective decision,” Mrs Novoselskaya said.

Earlier, Ukraine presented a report describing the condition of the cultural heritage sites in Crimea for the first half of 2017 at a session of the UNESCO Executive Board. The report says it was prepared on the basis of materials obtained “from human rights defenders and other reliable sources” who were not disclosed. However, it is obvious that the authors of the report have no idea about the current state of cultural and historical heritage sites in Crimea.

In particular, the Ukrainian side complains about some “illegal” geological work near the Swallow’s Nest, about the renovation of the Bakhchysarai Palace, archaeological excavations at the construction sites of the Tavrida highway and the access roads to the Crimean Bridge.

“I think our colleagues need to come and see just how much our sites have improved. The rock base of the Swallow’s Nest had to be reinforced because it could have collapsed being threatened by water and storm winds. The Bakhchysarai Palace, one of the major UNESCO sites in the Republic of Crimea, is also being renovated and becoming more and more beautiful as we speak. Preventive maintenance work on the famous Divan Hall is near completion,” Mrs Novoselskaya said.

A major complaint of the Ukrainian side was that the repair and renovation work takes place without their consent. “I worked in the cultural governance system under the Ukrainian rule, so I can tell you what Ukraine did,” said Mrs Novoselskaya. “No funding at all was provided for the Vorontsov, Livadia, Massandra palaces, the Swallow’s Nest, and Chekhov’s Dacha.

Administrations of the Palaces barely made ends meet to pay their staff a meagre salary. What kind of renovation, or collection enlargement, or facility improvement could we talk about then? They were simply stricken off from the budget of the Republic! This is a good example of how Crimean cultural heritage sites were treated during the Ukrainian time”.

According to the Minister, the citizens of Ukraine have not been banned from accessing cultural heritage sites in Crimea and they do visit them while spending their vacations there.

Exhibit B

Wikipedia, *Antoniuk, Anatoly Evdokimovich*

(translation)

Translation

Wikipedia, *Antoniuk, Anatoly Evdokimovich*, available at:
https://ru.wikipedia.org/wiki/Антонюк,_Анатолий_Евдокимович.

WIKIPEDIA

Antonyuk, Anatoly Evdokimovich

Anatoly Evdokimovich Antonyuk; born 6 December 1934 in Slavuta, Kamenets-Podolsk Region of the Ukrainian SSR, a Ukrainian and Soviet civil engineer, Candidate Doctor of Technical Sciences (1970), winner of the State Prize of Ukraine in Architecture (1999). Honoured Construction Worker of Ukraine.

Anatoly Antonyuk	
Birth name	Anatoly Yevdokimovich Antonyuk
Date of birth	6 December 1934 (88 years old)
Place of birth	Slavuta (currently in Khmelnytskyi Region, Ukraine)
Citizenship	 USSR → Ukraine
Occupation	Civil engineer
Awards and prizes	

Biography

After graduating from the Department of Industrial and Civil Engineering of the Kyiv Institute of Civil Engineering in 1957, Mr. Antonyuk worked for a construction company in the town of Zhovti Vody, Dnipropetrovsk Region (1957-1958). In 1958-1966, he worked at *Ukrvodokanalproekt* Design Institute (as a senior design engineer, head of new technologies, optimisation & inventions department) where he participated in designing industrial structures for metal works, chemical and mining facilities located in Ukraine and in other countries.

In 1966-1971, Mr. Antonyuk headed the department of new equipment, optimisation and technical information of the Ministry of Rural Construction of the Ukrainian SSR. In 1971-1983, he worked at *UkrDIPROgrazhdanselstroï* Institute as department head, chief engineer (since 1976); and chief engineering consultant for the State Design Institute of the Mongolian People's Republic (1963-1965, 1971-1972).

In 1969, Mr. Antonyuk completed an extra-mural postgraduate programme at the Kyiv Institute of Civil Engineering. In 1970, he defended his Candidate Doctoral thesis titled "The Effect of Foundation Structures on Seismic Resistance of Buildings". He took part in the development of structural designs for the following architectural monument restoration projects:

- in Kyiv – buildings of the National Opera House of Ukraine and the Ukraine National Palace of Arts, the Church of St. Nicholas on the Bank, the Church on Prytyssko-Mykilska street, the Cathedral of the Assumption of the Blessed Virgin Mary of the Kyiv Pechersk Lavra, the former Greek monastery complex on Kontraktova Square;
- in Kanev – St. George's Cathedral and Assumption Church;

- in Moscow – the Cultural Centre of Ukraine;
- in Sevastopol – St. Vladimir’s Cathedral, etc.

From 1983 to 2010, Mr. Antonyuk was the Director of *UkrNIIproektrestavratsiya* Design Institute under the State Committee on Construction of Ukraine.

In 1992, Mr. Antonyuk was an adviser to the Director General of the International Centre for the Study of the Preservation and Restoration of Cultural Property at UNESCO (Rome).

Since 2013, Mr. Antonyuk has been working at the National Kyiv-Pechersk Historical and Cultural Reserve.

Since 2016, Mr. Antonyuk has been the National Coordinator of the ICCROM of Ukraine (International Centre for Study of the Preservation and Restoration of Cultural Property)

He has 55 printed works and four copyright certificates for inventions.

Selected publications:

- Enclosing Structures in Rural Civil Buildings. The Construction & Architecture magazine, 1976, #6;
- Engineering Analysis as the Basis of Reconstruction. The Construction & Architecture magazine, 1987, #10;
- Site Tests of Micropile Foundations in Weak Soils at Architectural Monument Restoration Projects. The *Budivelnyk* magazine, 1988, #21;
- Collapsible Soil Resistance for Micropile Design. The Bases and Foundations interdepartmental collection of works, 1990, #23.

Awards:

- Order of Merit (Ukraine), I degree
- Order of Merit (Ukraine), II degree
- Order of Merit (Ukraine), III degree
- State Prize of Ukraine in Architecture (1999)
- Honoured Construction Worker of Ukraine.

Links:

- Anatoly Evdokimovich Antonyuk http://esu.com.ua/search_articles.php?id=43022

ARCHIVE COPY:

https://web.archive.org/web/20161018212125/http://esu.com.ua/search_articles.php?id=43022 dated 18 October 2016 on Wayback Machine (in Ukrainian)

Source:

https://ru.wikipedia.org/w/index.php?title=Антонюк,_Анатолий_Евдокимович&oldid=120749243

Exhibit C

RIA Novosti, *Paris Completes Reinforcement Work on Fire Damaged Notre-Dame*
(18 September 2019, updated 19 September 2019)

(translation)

Translation

RIA Novosti, *Paris Completes Reinforcement Work on Fire Damaged Notre-Dame* (18 September 2021), available at: <https://ria.ru/20210918/sobor-1750674763.html>.

RIA Novosti

18 September 2021 at 02:18 PM

Paris Completes Reinforcement Work on Fire Damaged Notre-Dame

In Paris, reinforcement work has been completed on the fire damaged Notre-Dame Cathedral.



© *RIA Novosti* / Alexey Filippov

PARIS, 18 September, *RIA Novosti*. Work to secure and reinforce the Notre-Dame Cathedral, heavily damaged by fire more than two years ago, has been completed, and reconstruction is scheduled to commence this winter, according to a press release by the public institution in charge of the restoration of Notre-Dame.

“The work to secure and reinforce the Notre-Dame de Paris Cathedral that began on the 16th of April 2019, has been successfully completed in accordance with the established schedule,” the press release says as quoted by BFM TV.

In particular, scaffolding has been removed, wooden framework has been installed, and lead-contaminated areas have been cleaned up.

The press release stresses that restoration works are scheduled to begin this winter.

The largest fire in the history of the Notre-Dame Cathedral broke out on the 15th of April 2019. The spire of the cathedral collapsed, and the supporting structure was engulfed in flames. The fire destroyed the unique wooden roof framework made of 800-year old oak beams, each from

a single tree trunk. According to firefighters, the overall structure of Notre-Dame and the main relics kept at the cathedral have survived. French President Emmanuel Macron has announced an ambitious goal to restore Notre Dame in five years, although many experts say that the reconstruction will take 10 to 15 years.

Exhibit D

SBI RC Bakhchisaray Historical, Cultural and Archeological Museum-Reserve, Letter to the
Head of the Republic of Crimea S. Aksyonov

(translation)

Translation

SBI RC Bakhchisaray Historical, Cultural and Archeological Museum-Reserve, Letter to the Head of the Republic of Crimea S. Aksyonov.

**REPUBLIC OF CRIMEA
MINISTRY OF CULTURE**

**STATE BUDGETARY
INSTITUTION OF
THE REPUBLIC OF CRIMEA
"BAKHCHISARAY HISTORICAL,
CULTURAL AND ARCHAEOLOGICAL
MUSEUM-RESERVE"**

298405, Bakhchisaray,
Rechnaya St., 133

tel. / fax <...>
e-mail: <...>
web: <http://handvorec.ru>

ref. No. _____
of _____ 2022

**To the Head
of the Republic of Crimea
S. Aksyonov**

Dear Sergey Valeryevich!

For purposes of providing information, I am forwarding data on the progress of work on the preservation of the cultural heritage of federal importance ensemble "Khan's Palace" as of 07 October 2022.

Annex: 22 pages.

1. a note, on 3 sheets;
2. the photographs, on 19 sheets.

**Sincerely,
the Director General**

V. Martynuk

A note
on the progress of work on the preservation of the cultural heritage objects of federal significance of the ensemble “Khan’s Palace” as of 07
October 2022

No.	Name of object	Work performed	Number of people carrying out the work	Name, position and telephone number of the person in charge	Name, position and telephone number of the person in charge on the contractor's side	Wishes, comments or complaints about the production of the work
1	The Retinue (Svetsky) corps	no work was recorded during the reporting period		Chief Architect of SBI RC "BHCAMR" <...> tel. <...>	Manager of the project "RC Gefest" LLC <...> tel. <...>	
2	Khan's kitchen	<u>work is in progress:</u> - installation of curb plate and floor girders.				
3	Stable building	<u>work is in progress:</u> - the roof overhang on the west facade; - the cladding of the skylight windows on the west slope of the roof in Axes 2-3 and 4-5; - floor sanding in room No. 103; - restoration of tiling; - restoration of the pinnacle in Axes 4-5; - floor sanding in room No. 201;				
4	Falcon Tower	<u>work is in progress:</u> - installation of battens; - restoration of the decorative wooden ceiling elements on the middle and upper levels; - plastering the internal surfaces of the stone walls.				

5	Library corps	<p><u>work is in progress:</u></p> <ul style="list-style-type: none"> - installation of battens and tiling on the roof; - restoration of the pinnacle of the Cultural Heritage "Palace Cemetery" - the continuation of archaeological investigations on the eastern side of the "Mufti's House"; - cleaning of the joints of the masonry fence in the south-west corner of the main courtyard; - cleaning of the seams of the masonry fence on the eastern and southern sides of the Persian Garden. 			
10	Khan's Mosque	<p><u>work is in progress:</u></p> <ul style="list-style-type: none"> - plastering of the destructed areas of the eastern wall; - replacement of the floor beams on the east and west wall in room No.1 (in accordance with Technical Inventory Bureau); - Replacement of the floor beams on the east wall in room No.2 (in accordance with Technical Inventory Bureau); - Marking and resurfacing of masonry floor in room No.1 (in accordance with Technical Inventory Bureau); - Dismantling of the roof of the western and eastern minarets. 			
11	Quay with three bridges	no work was recorded during the reporting period			

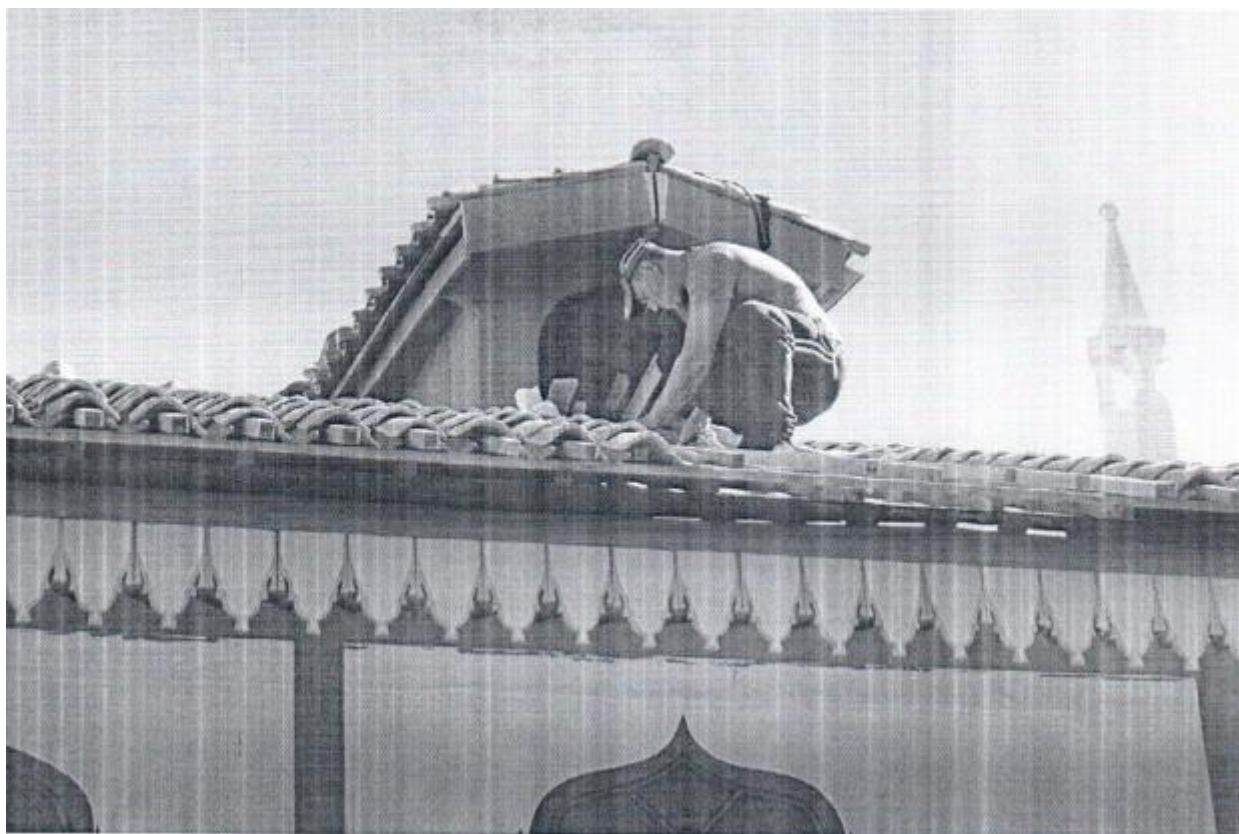
12	"Sary-Guzel" baths	no work was recorded during the reporting period			Head of section "NST" LLC <...> tel. <...>	
13	Tombstone rotunda				Head of section «STK" AM STROY" LLC <...> tel. <...>	



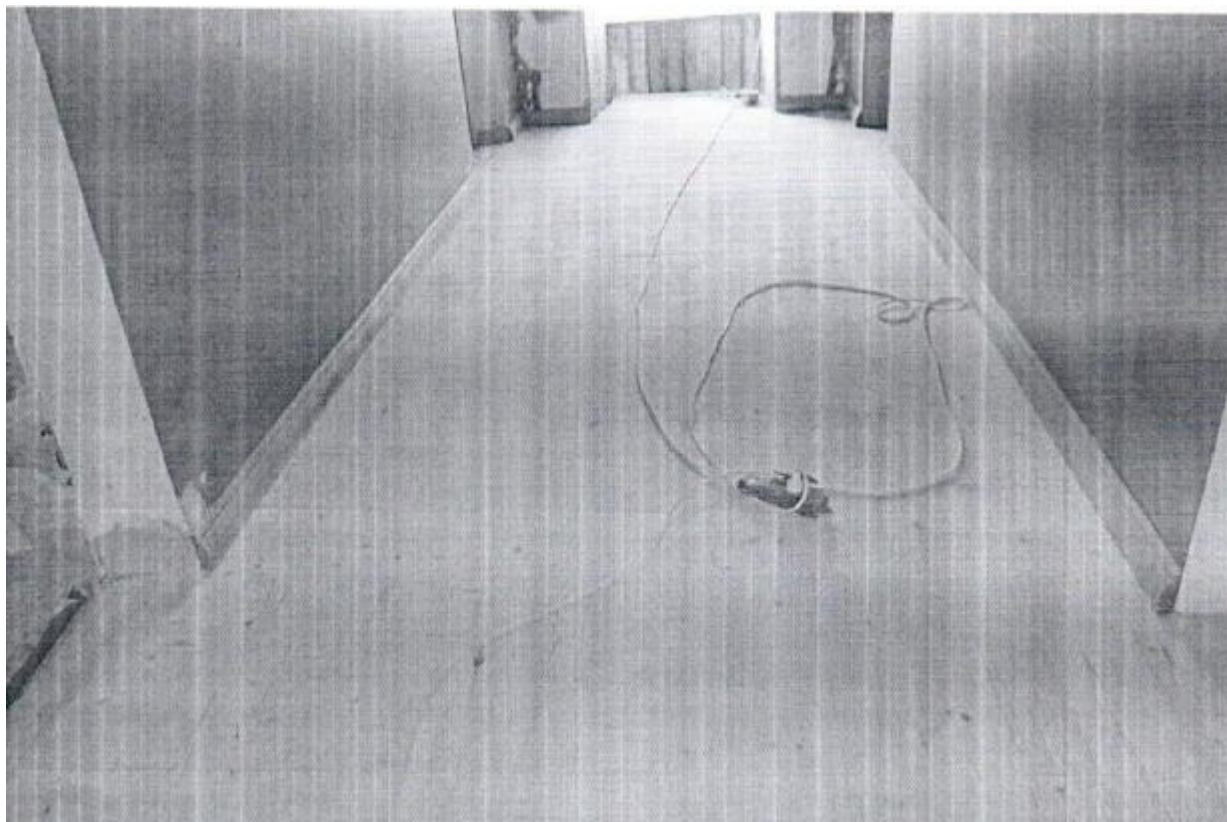
The “Khan's Palace” ensemble. Stable building. The roof overhang on the west facade. Photo dated 6 October 2022.



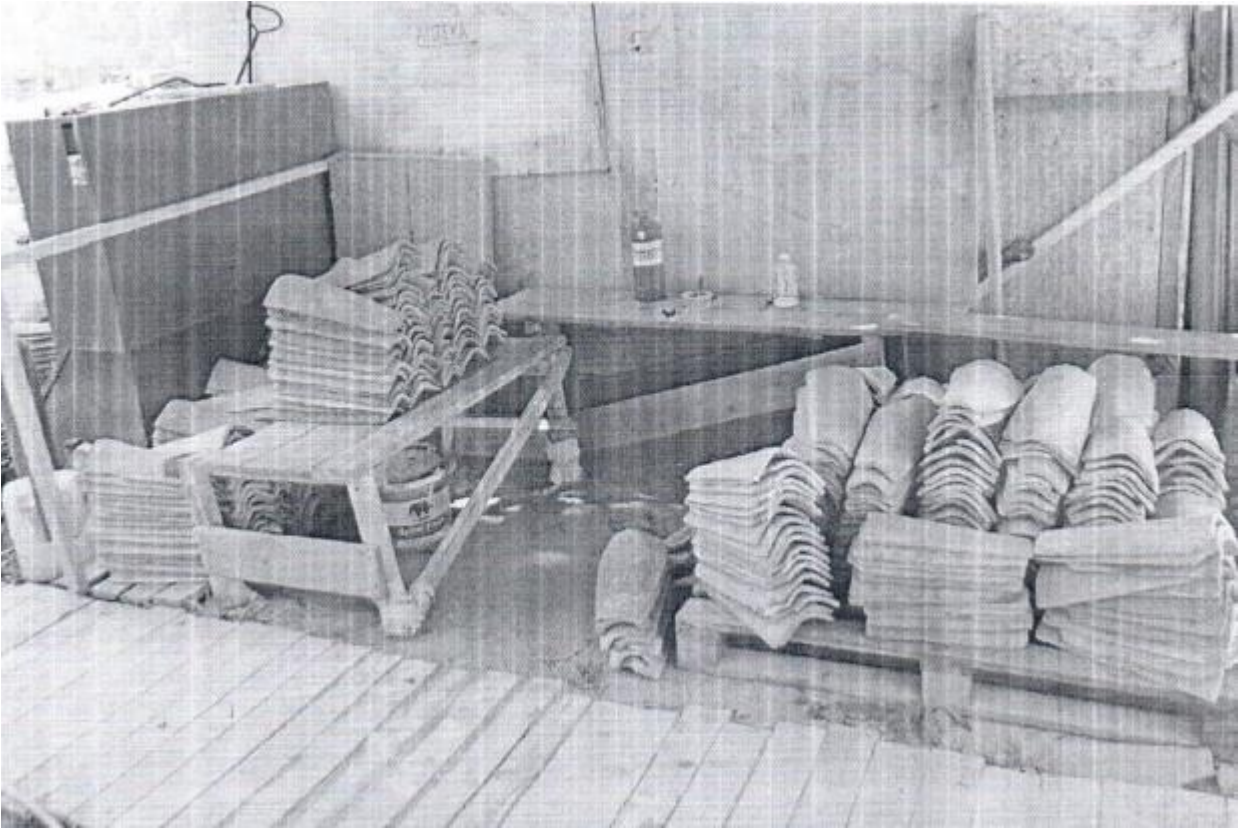
The “Khan’s Palace” Ensemble. Stable Building. Skylight window cladding on the west gable of the roof in axes 4-5. Photo dated 6 October 2022.



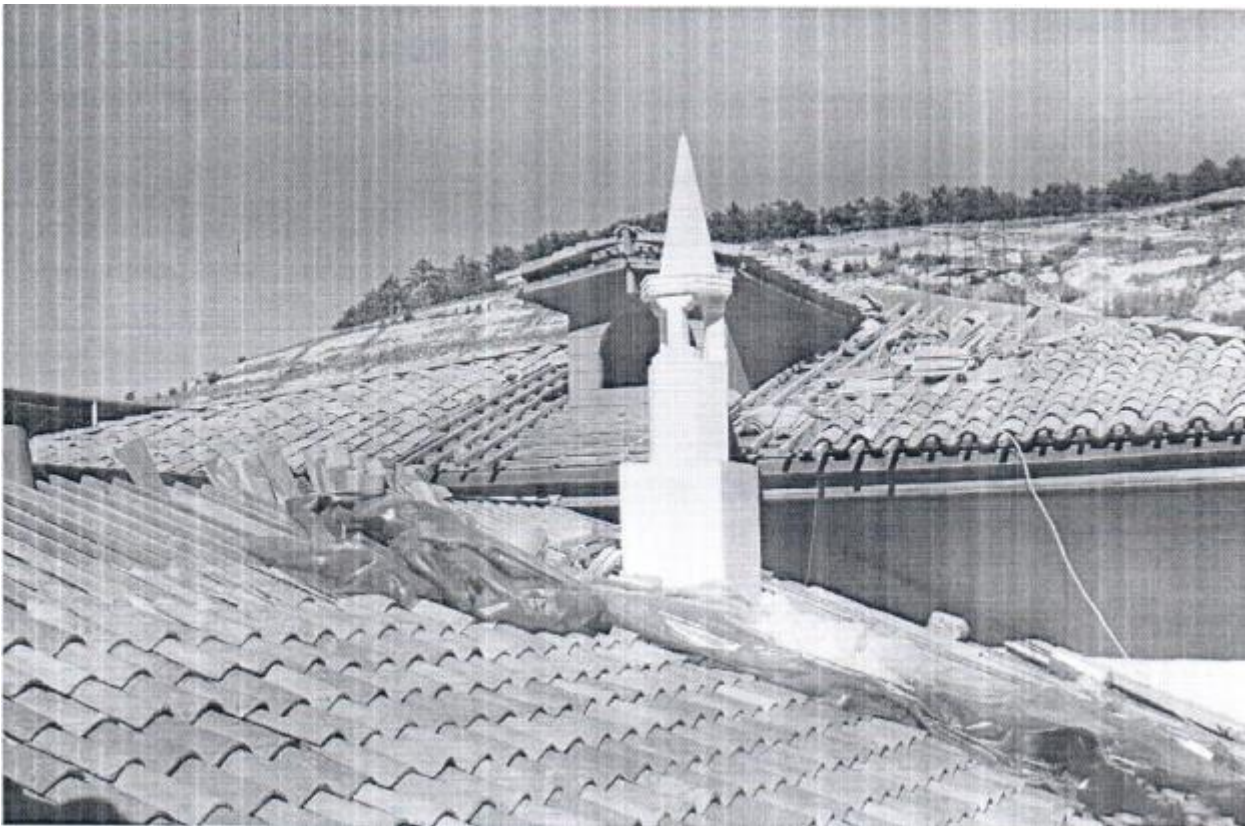
The “Khan's Palace” ensemble. Stable Building. Skylight window cladding on the west gable of the roof in axes 2-3. Photo dated 6 October 2022.



The “Khan's Palace” ensemble. Stable Building. Sanding the floor in room No. 103. Photo dated 6 October 2022.



The “Khan's Palace” ensemble. Stable Building. Restoration of the tiles. Photo dated 6 October 2022.



The “Khan's Palace” ensemble. Stable Building. Restoration of the pinnacle in axes 4-5. Photo dated 6 October 2022.

Exhibit E

Tavrida Muftiyat, *Khan's Palace Restoration to Be Monitored by Public Figures*
(22 March 2022)

(translation)

Translation

Tavrída Muftiyat, *Khan's Palace Restoration to Be Monitored by Public Figures* (22 March 2022), available at: <https://qmdi.ru/za-restavracziej-hanskogo-dvorcza-budut-sledit-obshhestvenniki/>.

**Khan's Palace Restoration to Be Monitored by Public Figures**

Published on the 22nd of March 2022

At the instigation of Hadji Emirali Ablayev, the Mufti of Crimea, a Public Advisory Panel has been set up to provide public oversight, monitoring and advice on repair and restoration of the federal-level cultural heritage site called the 16th-19th Century Khan's Palace Ensemble in Bakhchysarai. The first founding meeting was led by Sergey Aksyonov, Head of the Republic of Crimea. "The Khan's Palace is not only a pearl of Crimea, it is a unique and one-of-a-kind monument to traditions and culture of the Crimean Tatar people. It is planned that the restoration work will bring the palace back to its historical appearance, to what it looked like when it was built," Mr. Aksyonov said.

The Public Advisory Panel consists of Dmitry Rudnitsky, Chairman of the Union of Restorers, an archaeologist, Head of the Department of History at the Fevzi Yakubov Crimean Engineering & Pedagogical University, Emil Seidaliev, a historian, Andrey Malgin, a regional ethnographer, construction engineers Eldar Yayachik and Enver Emirdjiev, architects and restorers Valery Borisov and Shukri Khalilov.

"The efforts of this Panel will be aimed at helping the restoration workers and at keeping the public informed to avoid any potential speculations around the restoration of the Khan's Palace," said Crimean Mufti Hadji Emirali Ablayev.

Sergey Aksyonov noted that the Public Advisory Panel will also provide monitoring at other future cultural heritage work sites.

"Given that we have more than 4,000 various cultural monuments in the Republic of Crimea, I suggest that we should identify the most significant cultural heritage sites that are unique and symbolise Crimean historical milestones. These should include the main palace ensembles and monuments associated with the culture of all the ethnicities who have inhabited the peninsula. A specification of requirements will be issued by the Panel every time repair and restoration work is to be carried out at such sites. This will help avoid unnecessary expenses and ensure that the sites preserve their original appearance," Mr. Aksyonov said.

The meeting was also attended by Mikhail Nazarov, Deputy Chairman of the Council of Ministers of the Republic of Crimea, Karlen Petrosyan, Minister of Construction and Architecture of the Republic of Crimea, Tatiana Manezhina, Minister of Culture of the Republic of Crimea, and Ayder Tippa, Chairman of the State Committee for Interethnic Relations of the Republic of Crimea.

Press Service of the Spiritual Direction of the Muslims of Crimea, based on the information provided by the Information and Press Office of the Head of the Republic of Crimea.



Exhibit F

National University of Kiev-Mohyla Academy, *Dr Kateryna Busol*



[Home](#) → [Studies](#) → [Departments](#) → [Faculty of Law](#) → [International Law](#) → [Staff](#) → **DR. KATERYNA BUSOL**

International Law

- [Activities and News](#)
- [Staff](#)

[Jean Monnet Chair in European Union Law](#)

[Law Clinic](#)

Dr. Kateryna Busol

Contact



(Transitional Justice, Current Issues of International Criminal Law, International Criminal Law)
katya.busol@gmail.com

Links

- [CV](#)
- [List Of Publications](#)



Exhibit G

Kateryna Busol, *Crimea's Occupation Exemplifies the Threat of Attacks on Cultural Heritage*,
Chatham House (4 February 2020)

Donate to our annual fund today to support independent thinking and outstanding research. ×



Crimea's Occupation Exemplifies the Threat of Attacks on Cultural Heritage

Societies, courts and policymakers should have a clearer awareness that assaults against cultural heritage constitute a creeping encroachment on a people's identity, endangering its very survival.

EXPERT COMMENT 4 FEBRUARY 2020 — 3 MINUTE READ

Kateryna Busol

Former Academy Associate, Russia and Eurasia Programme





— ‘The destructive reconstruction of the 16th-century Bakhchysarai Palace is being conducted by a team with no experience of cultural sites, in a manner that erodes its authenticity and historical value.’ Photo: Getty Images.

Violations against cultural property – such as archaeological treasures, artworks, museums or historical sites – can be no less detrimental to the survival of a nation than the physical persecution of its people. These assaults on heritage ensure the hegemony of some nations and distort the imprint of other nations in world history, sometimes to the point of eradication.

As contemporary armed conflicts in Syria, Ukraine and Yemen demonstrate, cultural property violations are not only a matter of the colonial past; they continue to be perpetrated, often in new, intricate ways.

Understandably, from a moral perspective, it is more often the suffering of persons, rather than any kind of ‘cultural’ destruction, that receives the most attention from humanitarian aid providers, the media or the courts. Indeed, the extent of the damage caused by an assault on cultural property is not always immediately evident, but the result can be a threat to the survival of a people. This is strikingly exemplified by what is currently happening in Crimea.

Ukraine’s Crimean peninsula has been occupied by Russia since February 2014, meaning that, under international law, the two states have been involved in an international armed conflict for the last six years.

While much attention has been paid to the alleged war crimes perpetrated by the occupying power, reports by international organizations and the International Criminal Court (ICC) have been less vocal on the issue of cultural property in Crimea. Where they do raise²⁷ it, they tend to confine their findings to the issue of misappropriation.

However, as part of its larger policy of the annexation and Russification of the peninsula and its history, Russia has gone far beyond misappropriation.

Crimean artefacts have been transferred to Russia – without security justification or Ukrainian authorization as required by the international law of occupation – to be showcased at exhibitions celebrating Russia’s own cultural heritage. In 2016, the Tretyakov Gallery in Moscow staged its record-breaking Aivazovsky exhibition, which included 38 artworks from the Aivazovsky Museum in the Crimean town of Feodosia.

Other ‘cultural’ violations in the region include numerous unsanctioned archaeological excavations, whose findings are often unlawfully exported to Russia or end up on the black market.

There is also the example of Russia’s plan to establish a museum of Christianity in Ukraine’s UNESCO World Heritage site, the Ancient City of Tauric Chersonese. This is an indication of Russia’s policy of asserting itself as a bastion of Orthodox Christianity and culture in the Slavic world, with Crimea as one of the centres.

The harmful effects of Russia’s destructive cultural property policy can be seen in the situation of the Crimean Tatars, Ukraine’s indigenous Muslim people. Already depleted by a Stalin-ordered deportation in 1944 and previously repressed by the Russian Empire, the Crimean Tatars are now facing the destruction of much of the remainder of their heritage.

For example, Muslim burial grounds have been demolished to build the Tavrida Highway, which leads to the newly built Kerch Bridge connecting the peninsula to Russia.

The destructive reconstruction of the 16th-century Bakhchysarai Palace – the only remaining complete architectural ensemble of the indigenous people, included in the UNESCO World Heritage Tentative List – is another example of how the very identity of the Crimean Tatars is being threatened. This reconstruction is being conducted by a team with no experience of cultural sites, in a manner that erodes its authenticity and historical value – which is precisely as Russia intends.

There is a solid body of international and domestic law covering Russia's treatment of Crimea's cultural property.

Under the 1954 Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict – ratified by both Ukraine and Russia – the occupying power must facilitate the safeguarding efforts of the national authorities in occupied territories. States parties must prevent any vandalism or misappropriation of cultural property, and, according to the first protocol of the convention, the occupying power is required to prevent any export of artefacts from the occupied territory.

The 1907 Hague Regulations and the 1949 Fourth Geneva Convention confirm that the authentic domestic legislation continues to apply in occupied territories. This leaves Russia with no excuse for non-compliance with Ukraine's cultural property laws and imposing its own rules unless absolutely necessary.

Besides, both Ukrainian and Russian criminal codes penalise pillage in occupied territory, as well as unsanctioned archaeological excavations. As an occupying power, Russia must not just abstain from such wrongdoings in Crimea, but also duly investigate and prosecute the alleged misconduct.

The clarity of the international legal situation demonstrates that no exhibitions in continental Russia and no archaeological excavations which are not sanctioned by Ukraine can be justified. Likewise, any renovation or use of cultural sites, especially those on permanent or tentative UNESCO lists, must only be conducted pursuant to consultancy with and approval of the Ukrainian authorities.

But the resonance of the Crimean case goes beyond law and touches on issues of the very survival of a people. The Soviet deportation of the Crimean Tatars in 1944 did not only result in the deaths of individuals. Their footprints in Crimea have been gradually erased by baseless treason charges, the long exile of the indigenous community from their native lands and ongoing persecution.

First the Soviet Union and now Russia have targeted the Crimean Tatars' cultural heritage to undermine their significance in the general historical narrative, making attempts to preserve or celebrate this culture seem futile. Russia is thus imposing its

own historical and political hegemony at the expense of the Crimean Tatar and Ukrainian layers of Crimean history.

As exemplified by occupied Crimea, the manipulation and exploitation of cultural heritage can serve an occupying power's wider policies of appropriating history and asserting its own dominance. Domestic cultural property proceedings are challenging due to the lack of access to the occupied territory, but they should still be pursued.

More effort is needed in the following areas: case prioritization; informing the documenters of alleged violations about the spectrum of cultural property crimes; developing domestic investigative and prosecutorial capacity, including by involving foreign expert consultancy; more proactively seeking bilateral and multilateral cooperation in art crime cases; liaising with auction houses (to track down objects originating from war-affected areas) and museums (to prevent the exhibition of the artefacts from occupied territories).

When possible, cultural property crimes should also be reported to the ICC.

Additionally, more international – public, policy, media and jurisprudential – attention to such violations is needed. Societies, courts and policymakers should have a clearer awareness that assaults against cultural heritage constitute a creeping encroachment on a people's identity, endangering its very survival.

Topics

HUMAN RIGHTS AND SECURITY

Regions

UKRAINE

Departments

RUSSIA AND EURASIA PROGRAMME

LEADERSHIP ACADEMY

Annex 24

Expert Witness Statement of [REDACTED], 6 March 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

**EXPERT WITNESS STATEMENT
OF [REDACTED]**

6 MARCH 2023

1. I, [REDACTED], make the following statement.
2. In 1979 I graduated from [REDACTED] with a degree in Architecture. During my professional career I have been awarded the following decorations: [REDACTED]
[REDACTED]
[REDACTED]
3. Since pre-graduation practice (1978) while studying at the institute and up until now, for almost 45 years, I have been engaged in research and design activity related to restoring the cultural heritage of the Crimea, including in-house work at [REDACTED]
[REDACTED] for 14 years.
4. During my professional career, I have been involved in the restoration of 80 cultural heritage sites in various capacities: from specialist architect, team leader, and chief project architect to scientific supervisor of projects. The said cultural heritage sites include, among others, objects [REDACTED]
[REDACTED], etc.
5. I was a member of the working group for [REDACTED]
[REDACTED].
6. Apart from being involved in teaching, I take part in professional conferences and am the author of scientific and research and practice articles on the development, restoration and preservation of cultural heritage. In particular, [REDACTED]
[REDACTED]
[REDACTED] (on which Ukraine's position is largely based).¹
7. I am certified, and have the seal with the right of personal signature of the State Committee for Construction and the Union of Architects of Ukraine in the design of construction projects and urban development projects, and, accordingly, I am a

¹ "Restoration" of the Great Khan Mosque (Biyuk Khan-Djami) in Bakhchisaray: on the tile roofing. Expert opinion, № 33/02, 14 March 2018. Memorial, Annex 1031, p. 8.

conservation architect of the second category with the Ministry of Culture of the Russian Federation.

8. I have been [REDACTED], [REDACTED] and [REDACTED]. For 36 years I have been [REDACTED].

9. I have been living in Crimea for nearly 44 years, during which period, as part of my professional activities both before and after the reunification of Crimea with the Russian Federation, [REDACTED].

10. In this witness statement I address the history of the restoration of the Bakhchisaray Palace complex and provide my opinion as an architecture expert on Ukraine’s claims regarding the Bakhchisaray Palace restoration process set out in the Memorial and the Reply to Russia’s Counter-Memorial in the proceedings under the Convention on the Elimination of All Forms of Racial Discrimination (hereinafter, “Reply”).

A. BAKHCHISARAY PALACE BEFORE 2014

11. First of all, it should be noted that the use of the name “Bakhchisaray Palace Complex” is not accidental, as the name “Khan’s Palace” is not accurate. The fact is that the use of the name “Khan’s Palace” with regard to the complex is not quite correct: the main, freestanding building (“Khan Saray”, which means “Khan’s Palace” in Turkic), which housed the residence of the khans, was completely lost in the XVIII century. The whole complex was originally named after this property. At present, there is a building on the territory of the complex which is conventionally called the “Main Palace”, but historically it never fulfilled the functions of a palace. This building was originally used as a summer residence intended mainly for receiving ambassadors. Thus, the name “Khan’s Palace” is essentially a symbol representing the totality of its buildings.

12. Throughout its existence, the Bakhchisaray Palace has been constantly exposed to various factors which, in one way or another, have affected the degree of preservation and

authenticity of the complex's objects. For instance, back in the XVIII century the Khan's Mosque was, in fact, rebuilt after a fire. The initial volume and look of the mosque underwent significant changes. When the mosque was rebuilt after the fire in 1740 windows were installed, the dome was replaced by a pitched roof with a slope of more than 12 degrees and covered with concave tile instead of the original zinc tile (this fact is also confirmed by the experts referred to by Ukraine).² At that time the roof slope angle was determined without taking into account the concave tile installation technique, which subsequently caused problems with exploitation of the roof, and, consequently, the mosque itself.

13. During the Soviet period, the Bakhchisaray Palace became the centre of tourist attraction, which had its advantages and disadvantages. On the one hand, until 1991 the state allocated 4% of the income from tourism for the maintenance and restoration of historical and cultural monuments, including the Bakhchisaray Palace buildings, which allowed maintaining them in proper condition. On the other hand, the buildings of the Bakhchisaray Palace complex were turned into a museum and were open to tourists. In spite of the restorers' efforts, the bearing structures of the buildings of the Khan's Palace complex in Bakhchisaray were gradually deteriorating, also because of the change in their functional use. The large flow of visitors created considerable dynamic loads and vibrations that were not in line with its original purpose as the Khans' summer residence. The increased vibrations caused the multi-ton roof structure and concave tiles to move, resulting in the displacement, disintegration and collapse of the roof fragments. The said dynamic loads, combined with the peculiarities of the frame structure, difficult hydrogeological conditions at the footing of the buildings and a change in the ground water level of the Churuk-Su River, on the left bank of which the complex is located, negatively affected the deterioration of the technical condition of the buildings.
14. After the collapse of the USSR, the Crimea became part of Ukraine, a separate state. After the Autonomous Republic of Crimea was formed the Bakhchisaray Khan's Palace complex received status of a site of regional significance, resulting in corresponding financing throughout the Ukrainian period. As a result, restoration work was financed mostly from own funds of the administration of the Bakhchisaray Palace complex. Under

² *Ibid.*, p. 2.

such conditions it was extremely difficult to meet the needs of cultural heritage objects for full-scale, systematic research and for a set of restoration works.

15. At the end of the 20th century, at the request of Bakhchisaray Historical and Cultural Reserve, experts of the Institute “Ukrzhilremproektrekonstruktsiya”, jointly with experts of the Building Structures Department of the National Academy of Environmental and Resort Construction, examined the structures of the main building of the Khan’s Palace. The results showed that the load carrying structures of the wooden frame were affected by rot. As a result of continuous overmoistening, changes in the ground water level and leaks in the roof, the upper and lower mounting assemblies of the framework’s vertical supports, frame of the roof, and inter-floor constructions and garret floors had rotten and lost bearing capacity. In the meantime, the roof tiles continued to deteriorate due to dynamic loads. The situation was aggravated by an erroneous technological solution implement in the Ukrainian period consisting of securing the roof tiles with cement mortar, which replaced the elastic mortar of sand, lime, and clay. The roof acquired the characteristics of hard surface, two longitudinal cracks formed in it, and the roof began to easily let precipitation in, which constantly moistened the wooden structures of the supporting framework over a long period of time.
16. In the last decade of the 20th century, application was made to enter the Khan’s Palace complex on the UNESCO World Heritage List. As far as I know, the application was denied because of the site’s lack of authenticity. I became acquainted with the correspondence on this issue at the records repository of the Bakhchisaray Historical and Cultural Reserve in 2017, when I was making preparations for a public discussion of scientific and design solutions pertaining to the restoration of the Bakhchisaray Palace.

B. BAKHCHISARAY PALACE AFTER 2014

17. In the period after 2014, all buildings of the Khan’s Palace complex in Bakhchisaray were assigned the status of Sites of Federal Significance and, accordingly, they received the highest level of funding from the State Budget of the Russian Federation.
18. In 2016, at instructions of the Chairman of the Scientific and Methodological Council of the Committee for the Protection of Cultural Heritage of the Republic of Crimea, I took part in a preliminary inspection of the Main Building. The purpose of the preliminary inspection was to determine the condition of the building and the scope and types of

- necessary restoration works. Even then, in view of the building's emergency condition, given that it was unfit for exhibitions, as well as due to significant damage and loss of elements and interiors access of tourists to the 2nd floor premises was stopped.
19. The tile roofing of the building was thoroughly damaged and atmospheric precipitation moisture easily found its way into the premises; the ceiling boarding and plaster and finishing layers had residual deformation and cracks and were damaged, peeling and collapsing; the 2nd floor boarding was dismantled.
 20. The long-term continuous ingress of moisture resulting from the aforementioned causes caused rot, fungus and mould to infest the wooden frame and reduced the load-bearing capacity of the rafter system and inter-floor constructions and garret floors, especially support sections of beams and upper support sections of the frame's vertical pillars. Also, due to the rising groundwater level, the lower support sections of the pillars lost their load-bearing capacity.
 21. Following the preliminary inspection, proposals were developed based on the need to carry out high priority anti-damage works at the Main Building and a full comprehensive engineering examination of the entire territory and buildings of the Bakhchisaray Palace complex. Since then, for the first time in the complex's history, systematic comprehensive work has begun to study the factors leading to and causes of destruction of the buildings, to develop measures and design solutions for top-priority anti-damage works, and to ensure restoration, conservation and preservation of the buildings.
 22. Since 2013, [REDACTED], acting as chief architect for the projects and providing scientific and methodological guidance in the development of restoration projects in relation to buildings of the Khan's Palace complex in Bakhchisaray. The works were carried out based on tenders awarded by and contracts entered into with the Committee for the Protection of Cultural Heritage of the Republic of Crimea and, subsequently, the Department of the Ministry of Culture of the Republic of Crimea.
 23. Kiramet has a state licence for these types of work, and its staff are certified by the Ministry of Culture of the Russian Federation and assigned Categories 1 to 3. The Chief Project Engineer has a PhD in Technical Sciences.

24. Kiramet LLC's creative works have been regularly awarded 1st, 2nd and 3rd class diplomas at the annual international competitions Arkhnaslediye and No-Priz organised by the Union of Architects of Russia. The scientific and design documentation developed by the company at all project stages comply with the methodology of restoration works and the current regulatory framework, and have been developed in full and are complete. Moreover, all necessary approval statements of construction and historical and cultural appraisals have been obtained, and the respective projects have been repeatedly reviewed at public discussion meetings with the involvement of the media and representatives of national and cultural societies.
25. For example, before carrying out the first phase of the restoration of the Khan's Mosque, in the framework of relevant assignment³ and permit⁴ to conduct restoration works 6 volumes of project documentation were prepared, including 20 sections in total.⁵ This design documentation underwent a state historical, cultural and construction appraisal.⁶
26. I believe that in the dispute about the causes of the unsatisfactory and, to some extent, pre-emergency and emergency condition of the Bakhchisaray Palace complex and its loss of authenticity, it is necessary to rely on the totality of all research results, taking into account previous restoration, repair, maintenance, technical, technological and external works, and also taking into account changing engineering and geological conditions and the seismic situation at the complex location.
27. It should be borne in mind that throughout its centuries-long existence, the objects of the Khan's Palace complex in Bakhchisaray have changed both externally and in terms of the degree of preservation, with due regard for the impact of various factors, such as

³ State Budgetary Institution Bakhchisaray Historical, Cultural and Archaeological Museum-Reserve, Assignment for the performance of works to preserve a cultural heritage object (historical and cultural monument) of the peoples of the Russian Federation No. 15/2016, 28 March 2016 (Exhibit A).

⁴ State Committee for the Protection of the Cultural Heritage of the Republic of Crimea, Permit for the performance of works to preserve cultural heritage sites included in the Unified State Register of Cultural Heritage Sites (historical and cultural monuments) of the peoples of the Russian Federation No. 01-03/1415, 10 March 2017 (Exhibit B).

⁵ Scientific and Design Documentation, Volume IV, Section 4, Mycological investigations. Mechanical Testing, 2017, Counter-Memorial (CERD), Annex 696, pp. 3-4.

⁶ Report on the State Historical and Cultural Appraisal of the design documentation for the preservation of the federally significant cultural heritage site "Khan's Palace (XVI-XIX centuries): Khan's Mosque (1740-1743), 29 June 2017, Counter-Memorial (CERD), Annex 696.

- (a) physical “ageing” of the main load-bearing structures and finishing materials of the complex;
 - (b) loss of the original space planning solutions and building and finishing materials and technologies;
 - (c) normal wear and tear of structures, building materials, roofing, coverings, design and ornamented surfaces and members of structure and decorations;
 - (d) changes in dynamic loads due to changes in the functional use of the complex’s buildings;
 - (e) operational and technological mistakes during the period of the use of buildings and structures and of the drainage system to remove water from the adjacent areas; mistakes during the performance of restoration and repair works;
 - (f) changes in the hydrogeological and seismic situation that have significantly affected the stability and integrity of the load-bearing structures and their capabilities; and
 - (g) the impact of natural disasters (floods, earthquakes, mud streams, etc.).
28. This far from complete list of causes and factors, as well as historically determined processes, have led to the inevitable, practically and scientifically justified replacement of building and finishing materials of basic, load-bearing and enclosure structures and their finishing, and to the modernisation of technological solutions.
29. Regarding the replacement of the wooden beams on the roof of the Khan’s Mosque during the restoration works, it must be explained that this was a forced measure of necessity. As a first step, it is necessary to determine which of the mosque’s inter-floor constructions Ukraine considers authentic: the wooden centres, slab beams or the anti-seismic belt of the original dome mosque, which burned out completely during the 1736 fire, or the beam ceilings installed during the repairs following the fire and reconstruction of the mosque.
30. The wooden beams on the roof of the mosque were replaced at least four times in different periods of the mosque’s existence, as described in detail by the expert referred to by

Ukraine itself.⁷ The roof structures were successively replaced in 1740 under Selamet II Giray; in the 1770-ies, in preparation for the visit of Empress Catherine II; in the 1920-30-ies, in preparation for the arrival of Emperor Alexander II; and in the 1990-ies, in connection with the rebuilding of the minarets.

31. In the meantime, at all stages of the mosque's existence, the problem of preservation and integrity of the tile roofing has been observed. The grooved tiles of the roof, which are laid on the elastic mortar of sand, lime, and clay, cannot hold out on the roof structures and so they go down according to the laws of physics. In their turn, the displacement and collapse of the tiles allow atmospheric precipitation to penetrate into structures of the roof, attic flooring, anti-seismic belt, and intermediate floor. Under the long-term influence of continuous moisturization, all of the above-listed structures are infected by fungus and decay processes develop. As a result of all the processes described above, the support sections of the mosque beams have lost their load-bearing capacity.
32. Poor condition of the beams on the roof of the Khan's Mosque is evident from the diagram of defects I have in my possession, as was prepared upon visual inspection of the mosque's roof (Figure 1).

⁷ See "Restoration" of the Great Khan Mosque (Biyuk Khan-Djami) in Bakhchisaray: on the tile roofing. Expert opinion, № 33/02, 14 March 2018, Memorial, Annex 1031.

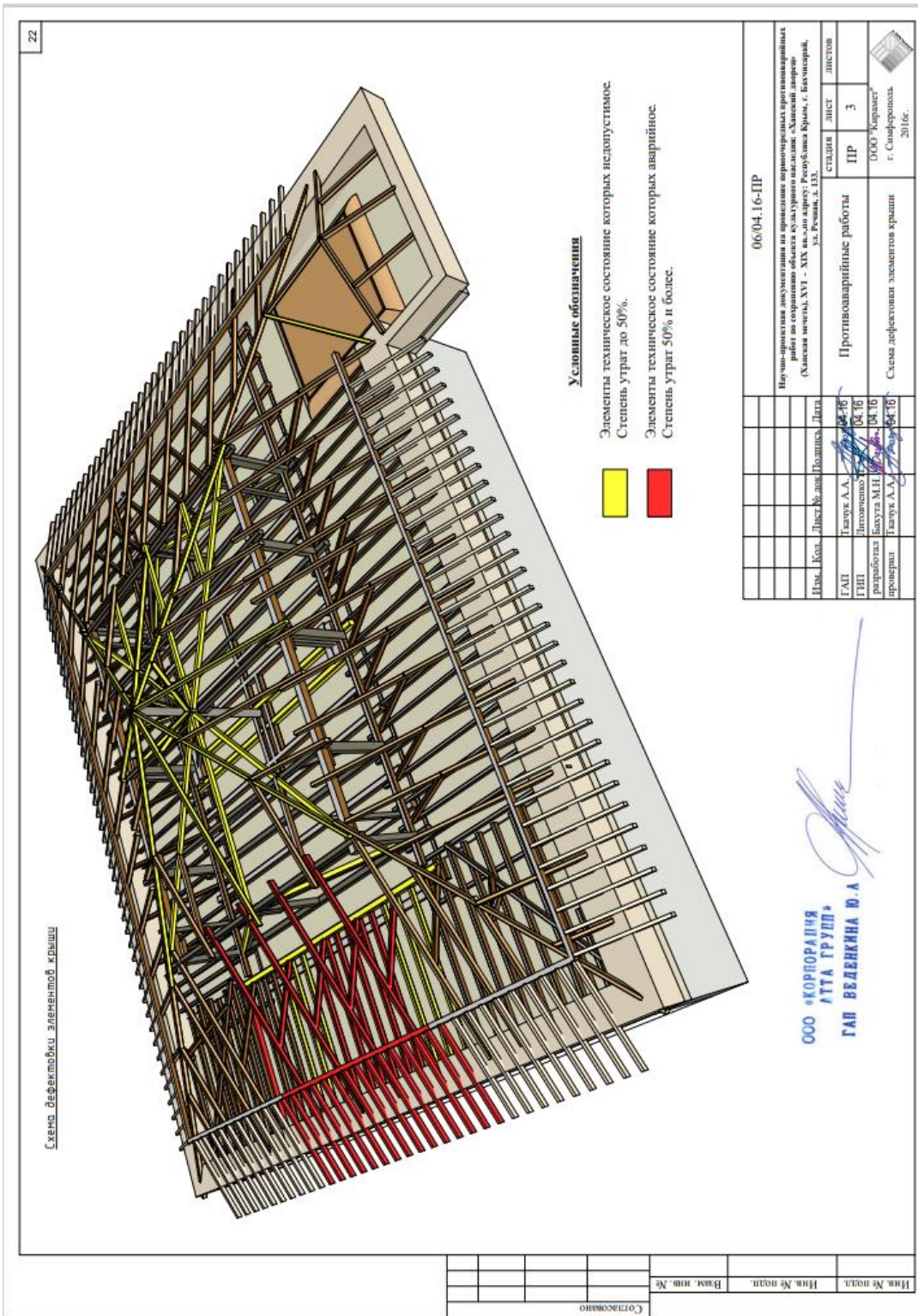


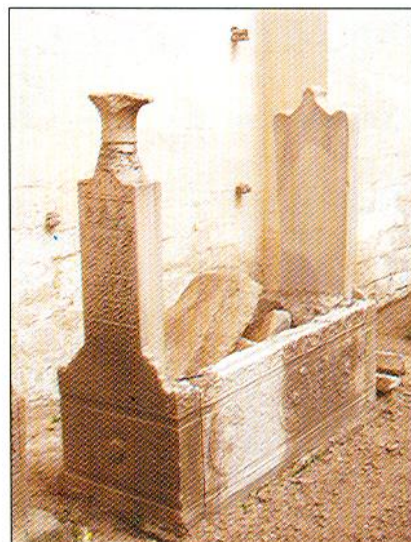
Figure 1

33. Meanwhile, the beams themselves have become shorter in length than the span they are supposed to bridge. Under safety and structural stability requirements it is prohibited to incorporate a prosthesis into support elements of beams in buildings that are in use. In accordance with the requirements of Construction Standards and Regulations SP 14.13330.2018 “SNiP II-7-81*, Construction in Seismic Areas”, in seismic environments the floor structure must be homogeneous. In view of these requirements and based on the calculation results, larch beams were selected to replace all wooden structures. The reason for replacing oak with larch is the decay resistance of larch and the fact that currently the oak trees no longer grow to a height that would allow beams to be manufactured to the required length.
34. The remarks about the loss of authentic specifically Crimean Tatar roofing, flooring and anti-seismic technologies are difficult to regard as fair. The use of post and beam framework is observed as early as in 1st century A.D. throughout archaeological sites in Crimea and its design and techniques do not differ from those used in buildings in the northern Black Sea Region dating much earlier.
35. As for the removed masonry stones, they were removed from those sections of the masonry that had lost their load-bearing capacity as a result of soaking and thawing. The reason for the soaking is the same: disturbance and loss of the tile roofing long before the restoration process began.
36. As for the Ukraine’s statements about alleged cracks, as far as I understand those allegations were made with regard to the Khan’s Mosque. I need to mention that such information is false as using cleaning equipment employing high pressure water may not deform the structures. Cracks in the plaster layer only indicate that the latter lost its stability earlier as a result of use. Furthermore, as far as I am aware for the purpose of cleaning the walls during restoration of Bakhchisaray Palace specific “safe” methods of cleaning were employed with pre-calculated water pressure.
37. Regarding the anti-seismic belt, I can provide the following clarifications. The installation of a concrete anti-seismic belt in the Khan’s Mosque was also due to objective circumstances. The fact is that the Bakhchisaray Palace is located in a seismically active zone that has changed since the time of its construction on the unstable soils of the Churuck-Su River bank. Russia's construction standards, in particular, SP 14.13330.2018

- “SNiP II-7-81*, Construction in Seismic Areas”, require that an anti-seismic belt be installed on cultural heritage objects and in public buildings in seismically active zones.
38. The design solution for the anti-seismic belt installation was developed in such a way as to “build” the belt in a wall niche and create a decorative layer which would hide the anti-seismic belt inside the palace wall so that it would not be visible to the outside observer and would not conflict with the overall appearance and cultural value of the building. In the meantime, creating a wooden anti-seismic belt is not envisaged by the building regulations of the Russian Federation, since such belt should not have an open contour, which arises at corner nodes when it is made of timber beams.
39. Ukraine also claims that the replacement of the “original” tiles with the Spanish ones causes significant damage to the cultural value of the Khan’s Mosque, but fails to take into account that the tiles at the mosque were re-laid at least 8 times from 1740 to the 1950-60-ies. This fact is also confirmed by the expert Ukraine refers to in its statements.⁸ When the tiles were re-laid, their standard size, shape and manufacturing technology changed. Thus, it is incorrect to call the tiles currently dismantled from the mosque roofing “authentic”. The removed tiles are remnants of reused tiles left over after the demolition of dilapidated houses in Bakhchisaray and the Bakhchisaray region. By now this tile replenishment resource has been exhausted.
40. That said, it is not possible to manufacture authentic tiles again, as the manufacture of replicas using a traditional technology is a process of modern imitation involving the use of a lost production line, raw materials from deposits whose locations have not been identified, and the craftsmen who are our contemporaries. In view of these factors, it appears to be impossible to consider this method of production as authentic. It is a modern imitation of historical technology and forms. Considering this, tiles were chosen for the roofing that are identical in shape, colour, composition and size to the authentic ones and that correspond to the decorative and volumetric and spatial parameters which are characteristic of the image of the Khan’s Palace. After a thorough analysis of proposals from manufacturers and suppliers, we opted for tiles that met the abovementioned criteria.

⁸ See *ibid.*

41. Regarding the method of laying tiles, I would like to clarify that nowadays the installation of tiles is done with self-tapping screws in accordance with the technology. Also, it should be noted that a change in the roof pitch back in the 18th century (which I mentioned earlier) made it impossible to use lime-sand-clay mixture for fixing, while cement-lime mixture makes the roof excessively heavy.
42. I would also like to clarify the issue regarding the shed over the Main Building of the Bakhchisaray Palace. The roof of the Main Building at the time of the study and design had ceased to protect the building from precipitation. To protect the Main Building from further deterioration a solution was designed to build a temporary protective shed. The architecture of this shed and its aesthetic and spatial features are utilitarian and do not claim to rival the grandeur of the architecture of the Khan's Palace complex.
43. Another statement that is obviously false is reference to a crack in the tomb of Ferah Sultan hani that allegedly resulted from improper restoration. Even superficial overview of earlier photos of the tomb show that it had already been significantly damaged prior to commencement of restoration. (Figure 2).



A03

Ферах-Султан-хани
б. Селим Герай-хан

Ferah Sultan hani
b. Selim Giray han

1167 - 1753/54

Figure 2⁹

⁹ See O. Gayvoronskiy, A CEMETERY OF CRIMEAN KHANS IN BAKHCHISARAY PALACE. SCHEME AND CATALOGUE OF MONUMENTS (DOLYA, 2006) (Exhibit C).

44. Furthermore, I personally observed that tombs in the immediate vicinity of the works were thoroughly protected from external forces by wooden scaffolding (Figure 3).



Figure 3

45. Regarding the issue of preserving the authenticity of building materials and technologies, I feel it necessary to advise that the term “authentic”, translated from the Greek, means “real, genuine, conforming to an original”. It is a very broad and variable concept, allowing for different interpretations. The only thing clearly excluded from the definition of “authentic” is a requirement of exclusive originality. Based on the definition, it is legitimate to consider as authentic all the materials, technologies, and volumetric and spatial solutions used during all historical periods of the existence of a cultural heritage object. In the study of objects such transformations are called “construction periods”. They may mimic the construction techniques and materials of previous periods, but are always traceable in the object. Therefore, the design solutions involving the use of some or other modern building materials and technologies in the buildings of the palace complex in Bakhchisaray have been dictated by the reasonableness of their use for ensuring physical preservation of the buildings, taking into account the need to meet the

exhibition requirements and the volumetric and spatial, ideological, image and other parameters of the object being restored.

46. It is known that the progress of restoration work at the Bakhchisaray Palace is monitored by representatives of the Crimean Tatar public, who from time to time approach the conservation professionals with questions regarding the restoration process. The conservation professionals respond to any comments they receive and, if they are constructive and justified, take steps to eliminate shortcomings.
47. As of now, the following works have been carried out since 2014:
 - (a) The status of the Khan's Palace complex in Bakhchisaray has been raised to that of a Cultural Site of Federal Significance, with appropriate funding being allocated under the Federal Targeted Programme for its operation and development and the performance of top-priority anti-damage works and restoration, conservation and repair works;
 - (b) A Comprehensive Engineering Examination of the complex's buildings has been conducted to assess the physical condition of the entire territory, including land improvement facilities, such as: gardens, courtyards, fountains, drainage system, etc;
 - (c) A strategy has been developed to implement measures to address the progressing deterioration of the complex's buildings;
 - (d) Projects have been developed and works have been performed to restore and conserve the following objects: the Mosque, the Turbes (Northern, Southern, and Dilyara-Bikech Turbes, the Sary-Guzel bathhouse, Rotunda); top-priority anti-damage works have been carried out in the Main Palace building; a digital model of the impact of loads on the structural system of the palace has been developed;
 - (e) The restoration of seven objects of the Bakhchisaray Palace complex has been completed;
 - (f) Research is carried out, including that involving the use of modern methods and technology for the purposes of review and obtaining the seal of approval in

connection with expert examinations at all levels corresponding to a federally significant site.

48. During exploitation prior to the commencement of the Main Palace and Great Khan's Mosque restoration, there occurred non-recoverable loss of the load-bearing capacity of the elements of their structure and the grooved tiles of the roof. When developing projects for the restoration of the buildings, a full set of research and design documentation was envisaged and prepared, covering all stages, from the research and documentation stage to the full completion of the works, when the designer's and engineer's supervision was carried out, taking into account the requirements and basic principles of the Restoration Work Methodology.
49. All research and design works are carried out with due consideration for the need to preserve to the greatest possible extent the volumetric and spatial, compositional, and silhouette parameters of the complex, the national and cultural traditions, and the exhibitional and other features that display characteristics of the image corresponding to the symbol of Khan's Palace, in honour of which the complex is historically named.
50. The disputes concerning the degree of preservation and authenticity of an object, conservation methods and techniques, technological subtleties and peculiarities of applying construction and finishing materials and coatings are of academic or scientific and methodological nature. The resolution of such disputes, subject to observance of copyright and author's solutions, lies within the competence of collegial bodies, as such issues are to be considered at meetings of scientific and methodological councils, which usually include experienced technologists, engineers, architects, historians, and art historians.
51. In my view, Ukraine's accusations against the Russian Federation regarding the progress of the restoration of the Bakhchisaray Palace complex and of deliberate destruction of the cultural heritage of the Crimean Tatars are unsubstantiated. In this case, the dispute has a scientific and methodological basis and has nothing to do with the issues of the alleged discrimination against Crimean Tatars. On the contrary, had the Russian Federation not started the process of comprehensive restoration of the Bakhchisaray Palace buildings, it could have led to the collapse of the unique cultural heritage sites. In any event, stopping

the process of the Bakhchisaray Palace restoration at this point could have irreversible consequences.

52. I cannot but note that Ukraine uses already outdated data from before 2014.
53. I hereby certify that to the best of my expert knowledge and belief the information set out in this witness statement is true.

Expert Witness

[Signature] _____

A solid black rectangular redaction box covering the signature.

Bakhchisaray, 6 March 2023

LIST OF EXHIBITS

Number:	Name of exhibit:
Exhibit A	State Budgetary Institution Bakhchisaray Historical, Cultural and Archaeological Museum-Reserve, Assignment for the performance of works to preserve a cultural heritage object (historical and cultural monument) of the peoples of the Russian Federation No. 15/2016, 28 March 2016.
Exhibit B	State Committee for the Protection of the Cultural Heritage of the Republic of Crimea, Permit for the performance of works to preserve cultural heritage sites included in the Unified State Register of Cultural Heritage Sites (historical and cultural monuments) of the peoples of the Russian Federation No. 01-03/1415, 10 March 2017.
Exhibit C	O. Gayvoronskiy, A CEMETERY OF CRIMEAN KHANS IN BAKHCHISARAY PALACE. SCHEME AND CATALOGUE OF MONUMENTS (DOLYA, 2006).

Exhibit A

State Budgetary Institution Bakhchisaray Historical, Cultural and Archaeological Museum-
Reserve, Assignment for the performance of works to preserve a cultural heritage object
(historical and cultural monument) of the peoples of the Russian Federation No. 15/2016,
28 March 2016

(translation)

Translation

State Budgetary Institution Bakhchisaray Historical, Cultural and Archaeological Museum-Reserve, Assignment for the performance of works to preserve a cultural heritage object (historical and cultural monument) of the peoples of the Russian Federation No. 15/2016, 28 March 2016.

AGREED: General Director State budgetary institution Bakhchisarai Historical, Cultural and Archaeological Museum-Reserve Martyshok V.L 17 March 2016 (Round Seal)	APPROVED: First Deputy Chairman <hr/> State Committee for the Protection of Cultural Heritage of the Republic of Crimea A.P.Belyantsev 28 March 2016 (Round Seal)
---	--

ASSIGNMENT

**for the performance of works to preserve a cultural heritage object
(historical and cultural monument) of the peoples of the Russian Federation
No. 15/2016**

1. Name of cultural heritage object:

Khan's Palace (16th - 19th centuries)

Object of the FTP - Bakhchisarai Palace and Park Complex (Khan's Palace), XVI - XIX cc.

2. Address (location) of the cultural heritage site: Republic of Crimea, City of Bakhchisarai, 133

3. Information on the owner (user) of the cultural heritage object:

Owner (user): State Budgetary Institution of the Republic of Crimea "Bakhchisarai Historical, Cultural and Archaeological Museum-Reserve

Address: Republic of Crimea (Republic, Oblast, Region), City of Bakhchisarai, 133

Bank account: _____

KPP: 910401001

Personal account: (redacted)

BIC: (redacted)

Correspondent account: _____

Authorised representative: Vadim Leonidovich Martynyuk

(Round Seal)

Telephone for contacts: _____

(including city code)

Email address: _____

4. Details of current protection obligations, protection and lease agreements or protection agreements:

Type: Protection agreement

No.: n/a

Date: 27 January 2011

Nature of contemporary usage: Sightseeing

5. Description of the boundary of the cultural heritage site and its protection zones (brief description with reference to the approval document):

Decision #284 dated 22.05.1979 of the Crimean Regional Executive Committee established the protection area of the Khan's Palace and Eski-Durbe and delimited the same by a boundary along Lenina street, Zoya Kosmodemyanskaya street, the Churuk-Su river, Proletarskaya street, Skalistaya street, continued further at a distance of 50m from the monument's southern and western fences and Shkolnaya street.

6. Brief information on the cultural heritage site and its technical condition, including minor architectural forms, monumental paintings and interior decoration, engineering structures and equipment

The Khan's Palace complex is a unique historical and architectural complex of monuments from the 16th-19th centuries, where elements of Oriental and European styles were intricately combined.

The complex of the khan's palace, which currently occupies an area of 4 hectares, is visible only from the palace itself, which is enclosed by a high stone fence, due to the closed nature of the oriental architectural traditions. With the exception of the minarets of the khan's mosque, no other structures are visible from the city.

The exact start date of the construction of the palace is unknown, and it was completed during the reign of Adil Sahib Giray-khan. The Sultan's palace in Istanbul (Top Kapi) served as a model for the construction. The Turkish architecture was transformed in a peculiar way by the participation of numerous captive craftsmen of different nationalities in its construction. Local traditions were also used: projecting roof canopies, arcades, terraces, carved lattices. The artistic value is represented by wood and stone carvings, paintings on walls, plafonds and door leaves.

The palace ensemble was built over two and a half centuries. It consists of various structures of different purposes and architectural style flanking a rectangular courtyard, which was used in khan's times for parades and gatherings of Crimean nobles.

The palace was built as three separate but interconnected complexes: the residential part, the harem and the front part.

In the XVII century, the residential complex was brought closer to the front part of the palace: to the north of the latter a two-storey residential building was built, opposite which the harem building was located. The second storey was built on top of the once single-storey front part of the palace.

In the 18th century the front part of the palace is connected to the living quarters and a new harem building is built. Buildings appear in the northern part of the complex, and the Dürbe Dilary Bikeç is built.

The earliest structures of the complex are the Sary-Guzel baths, located in the eastern part. The large mosque and the cemetery are dated back to the 16th century.

After the fire of 1736, when Russian troops captured Bakhchisarai, a new period in the history of the palace begins: the surviving buildings were restored, new ones were built - these works lasted for 30 years. It was at that time that the present-day ensemble was created, the decoration of which came to be dominated by the so-called Ottoman baroque. In that period, the servants' pavilion, count's pavilion and watchtowers, Golden cabinet and Falcon Tower were built.

With the annexation of Crimea to Russia (1783) the history of the palace's renovations begins, which tended to be timed with the arrival of Russian emperors.

The Khan's Palace, which forms a part of the Bakhchisarai State Historical and Cultural Reserve, still attracts numerous tourists with its uniqueness and original architectural solutions.

The Khan's Mosque. It is located in the main square of the Khan's palace, to the left of the main entrance. According to the inscription above the portal, the mosque was built in 1740. That, in all probability, relates only to the reconstructed of the facility, because the Polish king Stefan Bathory's envoy to Khan Muhammad Giray, who had visited the palace of Bakhchisarai in 1578, reported that here "a stone mosque and khans' tombs were built on some Christian ruins." Inscriptions on the facade show that in 1763, Khan Krim-Giray did a renovation. At the same time, the walls were painted by the court painter, architect and calligrapher Omer.

The basilica mosque is a rectangular stone building stretching from north to south, covered with a tiled roof with four sloping surfaces. Galleries with lancet arches and a single hip-tiled roof adjoin the main building from the east and west. There are two entrances - in the west and north. The narrow stone stairway adjoining the main façade leads to the khan's lodge. In the piers between the barred windows are green majolica cartouches with decorative patterns and excerpts from the Koran made in Arabic script.

On the north and south sides, the mosque is flanked by two minarets with multifaceted stone sherfe balconies with a rosette pattern on each face. The pointed end of the minarets is topped by an alem (the Muslim symbol of the 'three worlds').

The internal space of the mosque is a three-nave hall with arches and columns, surrounded on both sides by choir lofts. The choir lofts on the western side form a separate room, the khan's lodge, which is faced with faience tiles and covered with paintings. There is a stuccoed niche in the south side with a wooden preaching pulpit - minbar - on the right side of the niche.

The Great Khan Mosque is a monument of Ottoman art, which in the 18th century was strongly influenced by European Baroque and Rococo. Biyuk-Khan-Jami is one of the last monumental constructions created in the Crimean Khanate.

7. Cultural heritage object protection scope:

As of the time of writing this assignment, the scope of protection is not determined. In developing a full restoration design for the monument, a draft protection scope for the cultural heritage object "Khan's Palace (16th - 19th centuries)" must be developed and approved in the prescribed manner in accordance with the

Annex 24 Exhibit A

requirements of Article 47.3 of Federal Law No. 73-FZ of 25.06.2002 "On Cultural Heritage Objects (Historical and Cultural Monuments) of the Peoples of the Russian Federation".

8. Basis for carrying out preservation work on a cultural heritage site:

	State contract
Registration number	16
Date of approval	29.12.2015
The main content of the preservation works of a cultural heritage site:	Develop a complete restoration design of the cultural heritage object with determination of the protection scope (1st stage - preliminary studies, design of priority anti-disaster works)
Time of work commencement:	Stage 1 - January 2016
Completion date:	31.03.2016
Intended use of the object of cultural heritage: Sightseeing	

9. Information about the Customer:

Customer: State Committee for the Protection of Cultural Heritage of the Republic of Crimea

Address: Republic of Crimea, Simferopol, Gogol Street, 14

Bank account: _____

KPP: 910201001

Personal account: _____

BIC: (redacted)

Correspondent account: _____

Authorised representative: Alexei Pavlovich Belyantsev

Contact phone number: _____

10. Information on the design organisation: (natural person):

Organisation:

Limited Liability Company «Corporation ATTA Group"

Address: Russian Federation, Moscow, Koptevskaya Street, 73a, building 5

Bank account: (redacted)

Corr. Account: _____

Details of the Licence to carry out activities for the preservation of cultural heritage sites:

Registration number	MCRF 01019
Date of issue	12.08.2013

Authorised representative: Vedenkina Yulia Aleksandrovna

Contact telephone number: (redacted)

11. Information on design organizations by type of works: n/a

12. Information on the production organization/natural person:

Organisation:

Limited Liability Company «Corporation ATTA Group»

Address: Russian Federation, Moscow, Koptevskaya Street, 73a, building 5

Bank account: (redacted)

Corr. Account: _____

Details of the Licence to carry out activities for the preservation of cultural heritage sites:

Registration number	MCRF 01019
Date of issue	12.08.2013

Authorised representative: Vedenkina Yulia Aleksandrovna

Contact telephone number: (redacted)

13. Information on production organizations by type of works: n/a

14. Information about the previously made research and design documentation and possibility of using thereof: Research and design documentation for the restoration of the monument of architecture "Bakhchisarai palace and park complex (Khan's Palace') Khan Mosque. Preliminary works."

15. Composition and content of research and design documentation on the preservation of cultural heritage objects (general, by stage, local works):

Section 1: Preliminary work: Required priority emergency works phase of the Khan Mosque - explanatory note, working documentation, local cost estimates

Section 2: Integrated scientific research: required

1. pre-production stage - preparatory work
2. production stage – as needed

Section 3: Restoration and adaptation design (indicating whether options need to be developed, including on a competitive basis):

1. schematic design (architectural solutions) – required
2. design – required

Section 4: Detailed Research and Design Documents: Required

1. pre-production stage – Working architectural and construction drawings. Estimated cost documentation in paper and electronic form.
2. production stage - Refinement and adjustment of design solutions (as needed)

Section 5: Scientific-restoration report: draw up a report on the results of the repair-restoration work.

To be submitted to the State Committee for the Protection of Cultural Heritage of the Republic of Crimea within 90 working days from the date of completion of these works. A report shall include:

- recording and assessing the conformity of the work carried out with the approved design solutions;
- justified deviations from the design as a result of newly identified data, with appropriate adjustments to the design and estimate documentation prior to completion of the works;
- A description of the work carried out, indicating the technologies, materials, structures and equipment used; a scientific assessment of the work carried out and recommendations for further maintenance and operation;
- photographic material describing the monument before, during and after the work (with a fixed date).

16. Type and composition of demonstration materials: Not required

17. The procedure and conditions for the approval of the scientific and design documentation, indicating authorities and organisations:

The design documentation is submitted for approval to the State Committee for Cultural Heritage Protection of the Republic of Crimea in 4 copies along with the acts of the State Historical and Cultural Expert Examination of the scientific and design documentation for the preservation of the cultural heritage object in paper and electronic forms. If the works on the preservation of the cultural heritage object affect the structural and other characteristics of the reliability and safety of the object, these works are performed with a positive conclusion of the State expert examination of the design documentation provided in accordance with the Urban Development Code of the Russian Federation, and subject to State construction supervision over such works and State supervision in the field of protection of cultural heritage objects.

18. Requirements for scientific guidance, design and technical supervision, with indication of duration: Highly qualified specialists and scientists to be consulted. Authors' supervision, scientific supervision and technical supervision required.

19. Need to carry out experimental works on technology and methods of work with indication of types of work: as needed.

20. Initial and permit documentation to be submitted by the Client:

State contract, assignment for works on preservation of the cultural heritage object, documents certifying the right to use the cultural heritage object; protection agreement; act of determining the impact of the proposed works on structural and other characteristics of reliability and safety of the cultural heritage object (architectural and cultural monument) of the peoples of the Russian Federation.

21. Need to collect and prepare initial and permit documentation to provide technical assistance to the Customer with a list of documents: as needed.

22. Additional requirements and conditions:

Develop measures to ensure accessibility for people with disabilities when carrying out a full restoration project.

The Urban Planning Code of the Russian Federation of 01.01.2001 provides for the development of the above measures and technical solutions as part of a separate section of the design documentation

"Measures to provide access for persons with disabilities" (Article 48 (12) (10) of the Code)

The assignment prepared by:

Director General

ATTA Group Corporation Ltd

Natalya Valerievna Kryakvina

Exhibit B

State Committee for the Protection of the Cultural Heritage of the Republic of Crimea, Permit for the performance of works to preserve cultural heritage sites included in the Unified State Register of Cultural Heritage Sites (historical and cultural monuments) of the peoples of the Russian Federation No. 01-03/1415, 10 March 2017

(translation)

Translation

State Committee for the Protection of the Cultural Heritage of the Republic of Crimea, Permit for the performance of works to preserve cultural heritage sites included in the Unified State Register of Cultural Heritage Sites (historical and cultural monuments) of the peoples of the Russian Federation No. 01-03/1415, 10 March 2017.

**STATE COMMITTEE FOR THE PROTECTION OF THE CULTURAL HERITAGE
OF THE REPUBLIC OF CRIMEA**

14 Gogolya str., Simferopol, Republic of Crimea, Russian Federation, 295011

Tel./fax:24-76-62 e-mail: mail@gkokn.rk.gov.ru

OGR 1149102018493; INN / KPN 9102012851/910201001

10.03.17 No. 01-03/1415

PERMIT

for the performance of works to preserve cultural heritage sites included in the Unified State Register of Cultural Heritage Sites (historical and cultural monuments) of the peoples of the Russian Federation

In accordance with Article 45(2) of Federal Law No. 73-FZ of 25 June 2002 “On Objects of Cultural Heritage (historical and cultural monuments) of the Peoples of the Russian Federation”, this permit is issued to:

Limited Liability Company “Corporation ATTA Group”,

INN 7743797029

OGRN/OGRNIP 1107746869092

Address: 125239, Russian Federation, Moscow, Koptevskaya Street, 73a, building 5

Licence for the performance of activities to preserve objects of cultural heritage:

Issued 12.08.2013 No. MKRF 01019

Types of works: scientific research (test-pitting, trial-trenching)

When inspecting foundations, works should be performed pursuant to GOST R 55627-2013.

Object of cultural heritage: The Khan’s Palace (XVI-XIX centuries), Khan Mosque

Address (acc. to BTI): Republic of Crimea, Bakhchisarai, Rechnaya Street, 133, des. III.

Grounds for the Permit: Contract (Additional Agreement #8 dated 23.12.2016 to State Contract #16 dated 29.12.2015)

According to: Plan showing locations of field exploration work in the form of trial trenches and test pits at the object of cultural heritage “Khan’s Palace (XVI-XIX centuries), Khan Mosque” at address: Republic of Crimea, Bakhchisarai, Rechnaya Street, 133, des. III.

Documentation developed by:

Limited Liability Company “Corporation ATTA Group”,

INN 7743797029

OGRN/OGRNIP 1107746869092

Address: 125239, Russian Federation, Moscow, Koptevskaya Street, 73a, building 5

Licence for the performance of activities to preserve objects of cultural heritage:

Issued 12.08.2013 No. MKRF 01019.

This Permit is issued for the period until 30 April 2017.

Chairman of the State Committee
(Round Seal)

(signature) S.A. Efimov

Exhibit C

O. Gayvoronskiy, A CEMETERY OF CRIMEAN KHANS IN BAKHCHISARAY PALACE.
SCHEME AND CATALOGUE OF MONUMENTS (DOLYA, 2006)

(excerpt, translation)

**Excerpt
Translation**

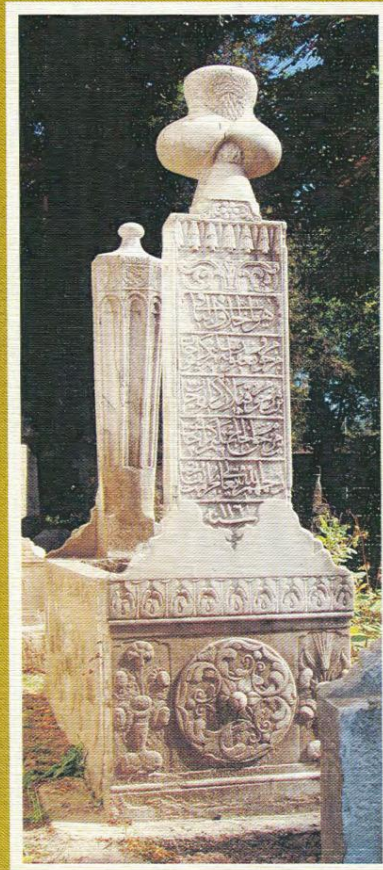
O. Gayvoronskiy, A CEMETERY OF CRIMEAN KHANS IN BAKHCHISARAY PALACE. SCHEME AND CATALOGUE OF MONUMENTS (DOLYA 2006).

1976

633 / 4 yaf - 64 p. 11 /
r - 12

Oleksa Gayvoronskiy

**A CEMETERY OF CRIMEAN KHANS
IN BAKHCHISARAY PALACE**



SCHEME AND CATALOGUE OF
MONUMENTS

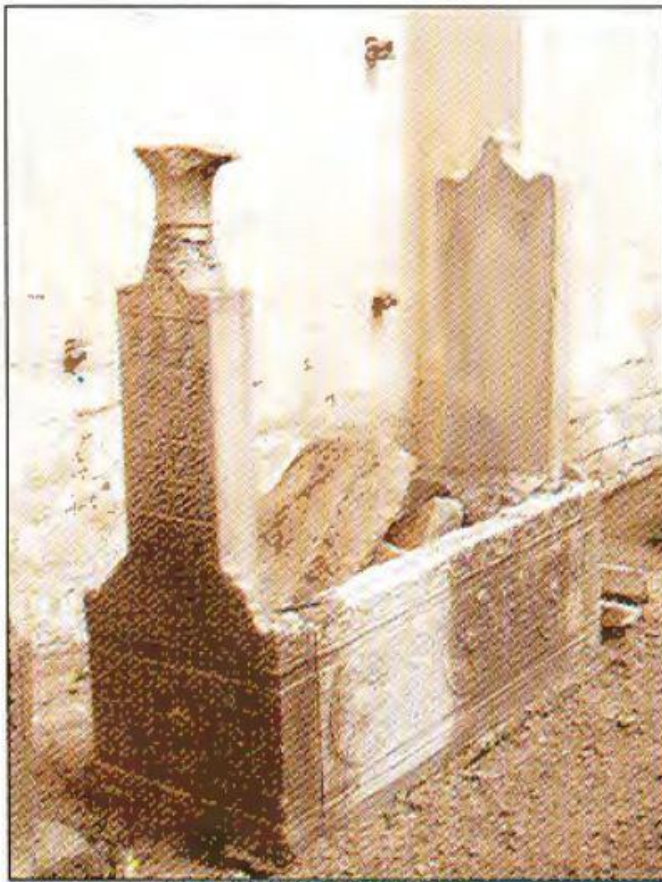
Oleksa Gayvoronskiy

A CEMETERY OF CRIMEAN KHANS IN BAKHCHISARAY PALACE

Oleksa Gayvoronskiy

BAGÇASARAY'DAKI KIRIM HANLARINA AIT MEZARLIK

Simferopol
DOLYA
2006



A03

**Ferah Sultan hani
b. Selim Giray han**

1167 - 1753/54

Annex 25

Witness Statement of Valentina Vasilyevna Lavrik, 7 March 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

**WITNESS STATEMENT OF
VALENTINA VASILYEVNA LAVRIK**

7 MARCH 2023

1. I, Valentina Vasilyevna Lavrik, declare the following.
2. Since December 2019, I have been heading the Ministry of Education, Science and Youth of the Republic of Crimea (hereinafter, “Ministry of Education”). I received my education as a teacher of the Ukrainian language, worked for a long time as a teacher and director in schools where instruction was in the Ukrainian language.
3. In this witness statement, I provide explanations on issues relating to the activities of the Ministry of Education and also comment on a number of allegations set out in Ukraine's Memorial and its Reply to the Russian Federation's Counter-Memorial on the dispute under the Convention on the Elimination of All Forms of Racial Discrimination.
4. This witness statement is based on my experience at the Ministry of Education and the material referenced below.

A. TEACHING UKRAINIAN AND CRIMEAN TATAR LANGUAGES IN CRIMEA

5. I fundamentally disagree with Ukraine’s assertion that since Crimea’s reunification with the Russian Federation, Russian authorities have consistently restricted opportunities for education in the Ukrainian and Crimean Tatar languages in Crimea.
6. As for the Crimean Tatar language, there are 7 300 students studying in the Crimean Tatar language in Crimea in the 2022/2023 school year, with a total of 33 351 students studying the Crimean Tatar language. These figures are significantly higher than the 5 551 students, according to Ukraine, taught in the Crimean Tatar language in the 2013/2014 school year, before Crimea’s reunification with Russia.¹ Those statistics show that Ukraine's allegations are unfounded.
7. As for the Ukrainian language, the number of students receiving their academic instruction in that language has indeed decreased. However, Ukraine’s argument that the Russian authorities are to blame for this reduction disregards a number of objective reasons for a drastic reduction in demand for the study of Ukrainian language.
8. First, learning Ukrainian was not popular in Crimea even before 2014. Even ethnic Ukrainians living in Crimea overwhelmingly considered Russian to be their native

¹ Memorial, ¶536.

language. Before 2014, only 7% of students were taught in Ukrainian, and this figure has been decreasing year by year.²

9. Second, after Crimea's reunification with the Russian Federation, Crimean students have much more opportunities to enter Russian universities, which are more prestigious than Ukrainian ones.³
10. Third, given the unpopularity of the Ukrainian language in Crimea, instruction in it was necessary primarily for students intending to build a career in fields in which knowledge of the Ukrainian language was essential. Such spheres were primarily civil service, military service and philology. After the reunification of Crimea with the Russian Federation, knowledge of the Ukrainian language is no longer a prerequisite for civil and military service. As for philology, Crimean universities, in particular Crimean Federal University n.a. Vernadsky (KFU) and Crimean Engineering and Pedagogical University n.a. Fevzi Yakubov (KIPU) still have educational programmes for specialists in the Ukrainian language.
11. Fourth, after the reunification of Crimea with the Russian Federation, the Ukrainian authorities have demonstrated that students from Crimea have no place in Ukraine. I am referring, in particular, to Letter No. 1/9-535 of the Ministry of Education and Science of Ukraine dated 14 October 2014.⁴ The letter stipulates that, for the purposes of entering Ukrainian higher education institutions, any documents of education issued by the Russian authorities in Crimea are void. In order to be considered to have graduated from school and be able to enter a Ukrainian university, Crimean schoolchildren (the vast majority of whom are minors), according to the Ukraine authorities' instructions, must leave their homeland and move from Crimea to Ukraine to complete their education in a

² Counter-Memorial (CERD), ¶¶294-295.

³ Thus, in 2023, the Times Higher Education world ranking included 77 Russian universities and only 10 Ukrainian ones. Among 1,799 universities, the most prestigious Russian university (Lomonosov Moscow State University) ranks 163, while the most successful Ukrainian university (Sumy State University) is not even in the first 400 universities. See Interfax, *Times Higher Education World University Rankings 2023* (14 October 2022), available at: <https://academia.interfax.ru/ru/analytics/research/9301/> (Exhibit A); Osvita.UA, *10 Ukrainian universities included in The Times World University Rankings* (14 October 2022), available at: <https://ru.osvita.ua/vnz/rating/87567/> (Exhibit B).

⁴ Ministry of Education and Science of Ukraine, Letter No. 1/9-535 "On the organisation of education in general educational institutions for persons residing in the temporarily occupied territory in the Autonomous Republic of Crimea, Sevastopol and anti-terrorist operation locations in Donetsk and Lugansk regions", 14 October 2014, available at: <https://don.kyivcity.gov.ua/files/2014/10/17/sodo1.pdf> (Exhibit C).

Ukrainian school. Needless to say, when the Ukrainian authorities “said goodbye” to all Crimean schoolchildren in that way, mass study of the Ukrainian language was out of the question: students did not associate their lives with enrolment in Ukrainian universities anymore, and, consequently, with the Ukrainian language. At the same time, the Russian Federation offered quotas for students from Crimea to study at universities.⁵ In a situation where Ukraine is telling Crimean schoolchildren at the state level that it does not need them, while Russian institutions are ready to accept students from Crimea en masse, schoolchildren's interest in studying Russian and the lack of demand for Ukrainian seem to me absolutely natural.

12. Between 2014 and 2019, I was the director of the Simferopol Academic Gymnasium, which also taught in Ukrainian, besides other languages. I witnessed with my own eyes the decline in demand for instruction in Ukrainian; the management was forced to respond to the decline in demand by reducing the number of classes instructed in Ukrainian. Schools cannot force students to choose Ukrainian as the language of instruction; however, educational institutions are willing to teach in Ukrainian if demand grows.
13. Moreover, the Ministry of Education is currently working with the Federal Institute of Native Languages of the Peoples of the Russian Federation to develop new Ukrainian language textbooks for 5-9 grades.
14. Besides, the Ministry is working on the construction of a new building in Feodosiya for School No. 20 with the instruction in Ukrainian. As far as I know, the city administration has already allocated a land plot of more than 2.5 hectares for the new building; work is under way to ensure financing of 500 million roubles for the construction works.

B. SVITANOK SCHOOL

15. The closure of the Svitanok group, contrary to Ukraine's unfounded allegations, does not indicate the “elimination” of Ukrainian culture by the Russian authorities in Crimea and does not show restrictions on the activities of children's groups promoting Ukrainian culture.

⁵ On that topic, see, e.g. RBC, *Crimean Quote* (22 July 2014), available at: <https://www.rbc.ru/newspaper/2014/07/22/56be2aba9a7947299f72ccb2> (Exhibit D).

16. First of all, the closure of the group was due to the fact that its head Alla Petrova had voluntarily quit her job at the House of Children's and Youth Creativity (hereinafter, "House of Children's Creativity"). Before leaving the job, Alla Petrova had never complained to the Ministry of Education about the work of the administration of the House of Children's Creativity.
17. Second, I have found that Ukraine refers only to an article by the British newspaper The Guardian in support of its claims about the situation with the Svitanok group. The article contains obvious distortions of the facts, for example, it states that the House of Children's Creativity is under the auspices of the Ministry of Culture of the Republic of Crimea, although in fact it is under the auspices of the Ministry of Education. Thus, I have good reason to believe that the authors of the article either did not understand the real situation or deliberately tried to mislead the readers.
18. Third, Ukraine has ignored the information of the House of Children's Creativity that children from Svitanok were invited to take part in other hobby groups (including theatre) existing at the House of Children's Creativity, including in the Ukrainian language.⁶
19. Fourth, the House of Children's Creativity reported that it had studios whose repertoire included Ukrainian art.⁷ The situation is not unique: children's and youth groups all over Crimea regularly perform Ukrainian art at various festivals and competitions. Here are just a few examples:
 - (a) In 2016, the Ministry of Education organised the annual "Crimean Terem House" music festival dedicated to the cultures of the peoples of Russia, including Ukrainian culture.
 - i) In 2018, the winner of the festival was the "Ulybka" ("Smile") Ensemble of the Alushta Children's Creativity Centre, who performed the Ukrainian Hutsul Dance.⁸

⁶ Annex 644 to the Counter-Memorial (CERD), p. 2.

⁷ Annex 644 to the Counter-Memorial (CERD), p. 3.

⁸ Crimean Newswire, *III "Crimean Terem House" Open Festival-Contest of Children's Folklore Groups held in Crimea* (3 December 2018), available at: <https://crimea-news.com/society/2018/12/03/465715.html> (Exhibit E).

- ii) In 2019, the winner of the festival was the “Pearl of Crimea” Ensemble of the Kerch Educational Complex/Boarding School-Lyceum of Arts, which performed the Ukrainian Veselka dance.⁹
- (b) At the Hopes of Europe International Competition in 2020, the “Vesnyanka” folk dance group (of the above-mentioned House of Children's Creativity) won a second-degree diploma with the Ukrainian “Transcarpathian Dance”.¹⁰
- (c) At the 2018 Sevastopol Dance Festival, several groups performed Ukrainian dances: the “Sudarushka” Ensemble of the Sevastopol Palace of Culture performed the Ukrainian Khorovod,¹¹ the “Sevastopol” Ensemble performed the Hutsul Dance, and the “Crimean Pearl” Ensemble from Saki performed the “Spring Spell” dance composition based on Ukrainian folk motifs.¹²
- (d) At the 2017 “Choreographic Recognition of Crimea” festival, the “Mozaica” Ensemble of the Children’s Choreographic School in Simferopol was remembered for its performance of the Ukrainian Pleskach dance.¹³
20. Thus, Ukraine's claims that the Crimean or Russian authorities are hindering the dissemination of Ukrainian culture, including Ukrainian children's art, are pure speculation and in contradiction to real situation.
21. I hereby confirm that, to the best of my knowledge and beliefs, the information set out in this witness statement is true.

⁹ State Budgetary General Education Institution of the Republic of Crimea “Kerch Educational Complex/Boarding School-Lyceum of Arts”, *Pearl of Crimea Dance Ensemble - Winner of the Republican Competition “Crimean Terem House”* (6 December 2019), available at: http://licey-iskusstv.ru/news/ansambl_tanca_zhemchuzhina_kryma_pobeditel_respublikanskogo_konkursa_krymskij_terem/2019-12-06-1123 (Exhibit F). Ukrainian dances are *Pearl of Crimea*’s hallmark – See Pearl of Crimea performance of the Ukrainian dance “Pleskach”: YouTube, Valera Mouzyka, *Ukrainian dance "Pleskach"* (17 June 2018), available at: https://www.youtube.com/watch?v=s58n97jdJ-k&ab_channel=ValeraMouzyka (Exhibit G).

¹⁰ YouTube, Russia’s Young Talents, *Transcarpathian dance. The folk-dance ensemble “Vesnyanka” from Simferopol performs at the competition in Sochi* (20 January 2020), available at: <https://www.youtube.com/watch?v=XVISJf-SafQ> (Exhibit H).

¹¹ YouTube, Krym Realii, *Ukrainian Khorovod performed at Sevastopol dance festival* (24 March 2018), available at: <https://www.youtube.com/watch?v=xIMw-tYXcfU> (Exhibit I).

¹² Krym.Realii, *Ukrainian and European dances performed in Sevastopol (+video)* (24 March 2018), available at: <https://ru.krymr.com/a/news/29121649.html> (Exhibit J).

¹³ YouTube, MTO UFK, *Crimean “Mozaica” Ensemble (Simferopol) performs Ukrainian dance “Pleskach”* (28 May 2017), available at: <https://www.youtube.com/watch?v=reg0-suYQi8> (Exhibit K).

Witness

[Signature] _____

Valentina Vasilievna Lavrik

Simferopol, 7 March 2023

LIST OF EXHIBITS

Number:	Name of exhibit:
Exhibit A	Interfax, <i>Times Higher Education World University Rankings 2023</i> (14 October 2022).
Exhibit B	Osvita.UA, <i>10 Ukrainian universities included in The Times World University Rankings</i> (14 October 2022).
Exhibit C	Ministry of Education and Science of Ukraine, Letter No. 1/9-535 “On the organisation of education in general educational institutions for persons residing in the temporarily occupied territory in the Autonomous Republic of Crimea, Sevastopol and anti-terrorist operation locations in Donetsk and Lugansk regions”, 14 October 2014.
Exhibit D	RBC, <i>Crimean Quote</i> (22 July 2014).
Exhibit E	Crimean Newswire, III “ <i>Crimean Terem House</i> ” <i>Open Festival-Contest of Children's Folklore Groups held in Crimea</i> (3 December 2018).
Exhibit F	State Budgetary General Education Institution of the Republic of Crimea “Kerch Educational Complex/Boarding School-Lyceum of Arts”, <i>Pearl of Crimea Dance Ensemble - Winner of the Republican Competition “Crimean Terem House”</i> (6 December 2019).
Exhibit G	YouTube, Valera Mouzyka, <i>Ukrainian dance “Pleskach”</i> (17 June 2018).
Exhibit H	YouTube, Russia’s Young Talents, <i>Transcarpathian dance. The folk-dance ensemble “Vesnyanka” from Simferopol performs at the competition in Sochi</i> (20 January 2020).
Exhibit I	YouTube, Krym Realii, <i>Ukrainian Khorovod performed at Sevastopol dance festival</i> (24 March 2018).
Exhibit J	Krym.Realii, <i>Ukrainian and European dances performed in Sevastopol (+video)</i> (24 March 2018).

Exhibit K YouTube, MTO UFK, *Crimean “Mozaica” Ensemble (Simferopol)*
performs Ukrainian dance “Pleskach” (28 May 2017).

Exhibit A

Interfax, *Times Higher Education World University Rankings 2023* (14 October 2022)

(translation)

Translation

Interfax, *Times Higher Education World University Rankings 2023* (14 October 2022), available at: <https://academia.interfax.ru/ru/analytics/research/9301/>.

InterFax

Education**Times Higher Education World University Rankings 2023**

14 October 2022 at 06:18 PM

Moscow, 14 October, *Interfax* – The British publication *Times Higher Education (THE)* has presented Times Higher Education World University Rankings 2023. This time, the rankings include 1,799 universities from 104 countries and regions of the world. Russia is represented by 77 universities, with the Lomonosov Moscow State University ranking at the 163rd place – the highest position among them.

THE World University Rankings are prepared annually based on 13 performance indicators grouped into the following five areas:

- 1) Teaching (30%), including reputation survey (15%), staff-to-student ratio (4.5%), doctorate-to-bachelor's ratio (2.25%), doctorates-awarded-to-academic-staff ratio (6%), and institutional income (income-to-staff ratio) (2.25%).
- 2) Research (30%), including reputation survey (18%), research income (research-income-to-staff ratio) (6%), and research productivity (academic-publications-to-staff ratio) (6%).
- 3) Citations (30%) consisting of one indicator: impact factor of academic citations (country-normalised average number of citations of one academic publication).
- 4) International outlook (7.5%), including proportion of international students (2.5%), proportion of international staff (2.5%), and international collaboration, which is the proportion of a university's publications that have at least one international co-author of a university's publications total publications for a five-year period (2.5%).
- 5) Industry income (knowledge transfer) (2.5%) consisting of one indicator measuring a university's income from industry-ordered research per university's staff member.

THE World University Rankings' coverage is continually expanded. This year, it includes 1,799 universities – an increasingly higher number compared to 1,662 in 2021 and 1,527 in 2020.

The Oxford University has been ranking the highest for the seventh year in a row. The leading group of the top 10 institutions includes seven U.S. and three UK universities.

Times Higher Education 2023 Top 10 World Universities

Rank	Name	Overall	Teaching	Research	Citations	Industry Income	International Outlook
------	------	---------	----------	----------	-----------	-----------------	-----------------------

Annex 25 Exhibit A

1	University of Oxford	96.4	92.3	99.7	99	74.9	96.2
2	Harvard University	95.2	94.8	99	99.3	49.5	80.5
3	University of Cambridge	94.8	90.9	99.5	97	54.2	95.8
3	Stanford University	94.8	94.2	96.7	99.8	65	79.8
5	Massachusetts Institute of Technology	94.2	90.7	93.6	99.8	90.9	89.3
6	California Institute of Technology	94.1	90.9	97	97.3	89.8	83.6
7	Princeton University	92.4	87.6	95.9	99.1	66	80.3
8	University of California, Berkeley	92.1	86.4	95.8	99	76.8	78.4
9	Yale University	91.4	92.6	92.7	97	55	70.9
10	Imperial College Landon	90.4	82.8	90.8	98.3	59.8	97.5

The list of Russian universities is topped by the Lomonosov Moscow State University (163), with MIPT ranking in the 201-250 group, Peter the Great St. Petersburg Polytechnic University, in the 301-350 group, and HSE University and MEPhI, in the 401-500 group.

17 Russian universities were assessed for the first time. Among them, the Financial University under the Government of the Russian Federation ranked the highest in the 601-800 group.

Russian universities performed showed the highest results in terms of industry income: MEPhI got 100 scores, and the Lomonosov Moscow State University and MIPT, 99.1 each. Citations remain the weakest point for Russian universities: it is this indicator they showed the poorest results for.

Russian Universities in THE World University Rankings 2023

Rank 2023	Name	Overall	Teaching	Research	Citations	Industry Income	International Outlook
163	Lomonosov Moscow State University	56.9	81	72.9	9.3	99.1	72.4
201-250	Moscow Institute of Physics and Technology (MIPT)	51.2-54.3	55.7	46.8	51.4	99.1	62.2
301-350	Peter the Great St. Petersburg Polytechnic University	47.0-48.7	31.1	23.7	83	75.5	57.4
401-500	HSE University	42.1-44.9	32.5	45.3	54.6	61.6	43.9
401-500	National Research Nuclear University MEPhI	42.1-44.9	45.3	41.7	29.1	100	70
501-600	Bauman Moscow State Technical University	39.3-42.0	56.6	32	23.8	81	49.5
501-600	Saint-Petersburg Mining University	39.3-42.0	22.6	14.5	83.3	82.3	35.3
601-800	Financial University under the Government of the Russian Federation	34.0-39.2	18.8	14.6	71.1	39.7	23.7
601-800	National University of Science and Technology (MISiS)	34.0-39.2	30.7	22.2	38.3	85.9	64.6
601-800	Plekhanov Russian University of Economics	34.0-39.2	21.9	12.2	66.7	40.1	42.1
601-800	RUDN University	34.0-39.2	38	21.5	37.9	43.4	63.5

601-800	Tomsk State University	34.0-39.2	41.5	374	18	88.7	73.5
801 1000	ITMO University	29.8-33.9	28.8	32.6	28.2	71.7	65.5
801-1000	Kazan Federal University	29.8-33.9	38.8	19.7	23.9	50.7	61.8
801-1000	Novosibirsk State University	29.8-33.9	39.2	34	16.6	39.2	46.5
801-1000	Saint Petersburg State University	29.8-33.9	46.3	39.7	11.9	39.7	45.7
801-1000	Sechenov University	29.8-33.9	27.3	15.7	38.8	42.7	56.7
801 1000	South Ural State University	29.8-33.9	17	13.3	64.9	41.6	41.6
1001-1200	Don State Technical University	24.4-29.7	17	8.8	61.5	38.2	27.1
1001-1200	Tomsk Polytechnic University	24.4-29.7	31.5	20.2	19.3	684	63.8
1001-1200	Ufa State Petroleum Technological University	24.4-29.7	18.5	8.7	61.9	36.9	24.9
1201-1500	Altai State University	184-24.3	18.8	15	11.8	43.2	55.9
1201-1500	Far Eastern Federal University	18.4-24.3	27.7	18.4	16.1	43.6	53.9
1201-1500	Immanuel Kant Baltic Federal University	18.4-24.3	30.7	15	12.6	48.3	53.3
1201-1500	Irkutsk National Research Technical University	18.4-24.3	17.7	9.6	34.5	43	26.2
1201-1500	Kazan National Research Technical University	18.4-24.3	17.8	12.3	31.4	51.1	27.6
1201-1500	Kazan National Research Technological University	184-24.3	18	9.2	38.6	52.1	32.2
1201-1500	Kazan State Medical University	18.4-24.3	39.4	9.2	1.2	36.9	42.4
1201-1500	Lobachevsky State University of Nizhni Novgorod	184-24.3	264	12,5	9.9	46.4	34.4
1201-1500	Moscow Aviation Institute	18.4-24.3	25.4	12.7	23	70.9	27.5
1201-1500	Moscow State University of Civil Engineering	184-24.3	18.1	11.3	32.8	53.6	23
1201-1500	National Research University of Electronic Technology (MIET)	184-24.3	39.7	13.5	34	78	22.9
1201-1500	National Research Saratov State University	18.4-24.3	21.3	13.5	14.3	43.7	33.9
1201-1500	Pirogov Russian National Research Medical University	18.4-24.3	42.1	11.2	3.1	40.8	20.8
1201-1500	Samara National Research University (Samara University)	18.4-24.3	213	15.4	17.6	42.8	36.5
1201-1500	Siberian Federal University	184-24.3	24.8	19.6	17	684	54.9
1201-1500	Southern Federal University	184-24.3	222	134	13	48.2	37.3
1201-1500	St. Petersburg Electrotechnical University (LETI)	184-24.3	142	154	14	54.8	38.1
1201-1500	Ural Federal University	18.4-24.3	23.8	23.2	15	62.9	55.2
1201 1500	Volgograd State Technical University	18.4-24.3	15.9	9.6	39.2	38.8	23
1201-1500	Voronezh State Technical University	184-24.3	19.7	8.7	404	38.6	20.5
1501+	Bashkir State University	104-18.3	16.3	9.3	4.2	40.2	17.9

Annex 25 Exhibit A

1501+	Belgorod State National Research University	104-18.3	192	114	7.8	50.6	38.3
1501+	Gubkin Russian State University of Oil and Gas	104-18.3	18	10.6	11.6	53.1	24.5
1501+	Industrial University of Tyumen	104-18.3	17	9.5	20.1	38	20.2
1501+	Irkutsk State University	104-18.3	17.1	10	10.3	38.9	23.9
1501+	Ivanovo State University of Chemistry and Technology	104-18.3	16.6	10	0.8	36.9	22.1
1501+	Kemerovo State University	104-18.3	16.8	9.6	2.6	394	20.3
1501+	Mendeleev University of Chemical Technology	104-18.3	17.5	13.6	6.5	47.7	20.5
1501+	MIREA- Russian Technological University	104-18.3	15.2	11.1	2.9	58.3	19.7
1501+	Moscow Polytechnic University	104-18.3	17.1	94	8.9	36.9	27.8
1501+	Moscow Power Engineering Institute	104-18.3	19.4	16.7	9.6	75.4	34.8
1501+	Nizhny Novgorod State Technical University	104-18.3	17.6	9.2	6.4	48.9	20
1501+	North-Caucasus Federal University	10.4-18.3	22.7	9	16.5	38.4	29.7
1501+	North-Eastern Federal University	104-18.3	21.5	9.7	6	37.7	23.5
1501+	Northern (Arctic) Federal University named after M.V. Lomonosov	10.4-18.3	17.7	11	4	39.3	27.5
1501+	North-Western State Medical University named after I.I. Mechnikov	104-18.3	22.1	8.3	1.3	36.9	25.1
1501+	Nosov Magnitogorsk State Technical University	104-18.3	15.9	10.3	5.5	38.7	17.7
1501+	Novosibirsk State Technical University	10.4-18.3	20.1	13	5.5	40.5	36.9
1501+	Ogarev Mordovia State University	104-18.3	15.5	9.2	3.2	39.7	28.9
1501+	Omsk State Technical University	10.4-18.3	16.4	8.7	6.5	38.9	32.2
1501+	Pavlov First Saint Petersburg State Medical University	104-18.3	23.1	9.2	10.6	39.7	31.4
1501+	Penza State University	104-18.3	14.1	84	9	37.3	27.5
1501+	Perm National Research Polytechnic University	10.4-18.3	19.3	10.8	3.9	67.5	24.9
1501+	Perm State University	104-18.3	18.9	11.3	2.2	42.3	20.9
1501+	Platov South-Russian State Polytechnic University (NPI)	104-18.3	15.1	9.4	3.8	41.6	21.9
1501+	Privolzhsky Research Medical University	104-18.3	18.8	84	1.4	36.9	33.7
1501+	Russian Presidential Academy of National Economy and Public Administration	104-18.3	20.8	16.3	6.5	41	21
1501+	Samara State Technical University	104-18.3	15.6	114	7.1	47.9	18.4
1501+	Siberian State Medical University	104-18.3	17.3	8.3	0.9	37	38.8
1501+	Southwest State University	104-18.3	17.7	10.1	7	41.1	26.9
1501+	Tomsk State University of Control Systems and Radioelectronics	104-18.3	175	11.2	18.1	55.6	33.2

1501+	University of Tyumen	104-18.3	16.6	12.7	9	41.1	34.5
1501+	Ufa State Aviation Technical University	104-18.3	15.8	9.5	8.7	42.7	18
1501+	V.I. Vernadsky Crimean Federal University (Vernadsky CFU)**	104-18.3	17.1	8.6	6.5	37.1	24.1
1501+	Voronezh State University	104-18.3	18.8	10.2	3.3	37.9	34.7
1501+	Yuri Gagarin State Technical University of Saratov (SSTU)	104-18.3	12.5	8.9	7.2	37.5	16.7
Reporter	Almazov National Medical Research Centre	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Bashkir State Medical University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Derzhavin Tambov State University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Donetsk National University of Economics and Trade named after Mykhailo Tuhan-Baranovsky (DonNUET)**	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Dostoevsky Omsk State University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Innopolis University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Ivanovo State University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Kabardino-Balkarian State University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Kazan State Power Engineering University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Moscow Pedagogical State University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Moscow State University of Food Production	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Moscow State Linguistic University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Novosibirsk State University of Economics and Management	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Omsk State Agrarian University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Orel State Agrarian University named after N.V. Parahin	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Orel State University named after 15. Turgenev	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Rostov State University of Economics	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Russian State Agrarian University - Moscow Timiryazev Agricultural Academy	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Russian State University for the Humanities	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Russian State Social University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Ryazan State Medical University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Saint Petersburg State Pediatric Medical University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Samara State University of Economics	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Samara State Medical University	n/a	n/a	n/a	n/a	n/a	n/a

Annex 25 Exhibit A

Reporter	State University of Land Use Planning	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Tomsk State Pedagogical University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Ural State Medical University	n/a	n/a	n/a	n/a	n/a	n/a
Reporter	Volgograd State University	n/a	n/a	n/a	n/a	n/a	n/a

* “Reporter” means a university that has submitted data for including in the rankings but fails to meet any of the inclusion criteria. 526 universities were considered to be “Reporters” in *THE 2023 World University Rankings 2023*.

** The V.I. Vernadsky Crimean Federal University and the Donetsk National University of Economics and Trade named after Mykhailo Tuhun-Baranovsky are considered to be Ukrainian institutions by *Times Higher Education*.

Exhibit B

Osvita.UA, *10 Ukrainian universities included in The Times World University Rankings*
(14 October 2022)

(translation)

Translation

Osvita.UA, *10 Ukrainian universities included in The Times World University Rankings (14 October 2022)*, available at: <https://ru.osvita.ua/vnz/rating/87567/>.

10 Ukrainian universities included in The Times World University Rankings

Osvita.ua

14 October 2022



***Times Higher Education
World University Rankings
2023 Includes 10 Ukrainian
Universities***

Times Higher Education World University Rankings 2023 includes 10 Ukrainian universities.

This year, the list includes a total of 1,799 universities from 104 countries and regions.

The compilers of the list note it is based on 13 carefully calibrated performance indicators grouped into the following four categories: teaching, research, knowledge transfer, and international outlook.

The Sumy State University ranked the highest among all Ukrainian universities – it was included in the 401-500 group.

The Lvov Polytechnic National University ranked the second, in the 601-800 group.

The Kharkov National University of Radio Electronics ranked the third, in the 1,001-1,200 group.

The other Ukrainian universities ranked in the following order:

- Ivan Franko National University of Lvov;
- National Technical University Kharkov Polytechnic Institute;
- National Technical University of Ukraine – Igor Sikorsky Kiev Polytechnic Institute;
- Oles Gonchar Dnepr National University;
- Taras Shevchenko National University of Kiev;

- V.N. Karazin Kharkov National University; and
- Yury Fedkovych Chernivtsi National University.

The Oxford University has been topping *THE* World University Rankings for the last seventh years. The Harvard University remained number two, and the University of Cambridge climbed from the fifth place last year to the third one this year.

The United States is the most represented country in *THE* World University Rankings 2023, which includes a total of 177 U.S. universities, 58 of them ranking among the top 200.

Mainland China ranked fourth in terms of the number of universities among the top 200 (11 this year compared to 10 last year) and was ahead of Australia (along with the Netherlands), which came down to the fifth place.

Exhibit C

Ministry of Education and Science of Ukraine, Letter No. 1/9-535 “On the organisation of education in general educational institutions for persons residing in the temporarily occupied territory in the Autonomous Republic of Crimea, Sevastopol and anti-terrorist operation locations in Donetsk and Lugansk regions”, 14 October 2014

(translation)

Translation

Ministry of Education and Science of Ukraine, Letter No. 1/9-535 “On the organisation of education in general educational institutions for persons residing in the temporarily occupied territory in the Autonomous Republic of Crimea, Sevastopol and anti-terrorist operation locations in Donetsk and Lugansk regions”, 14 October 2014, available at: <https://don.kyivcity.gov.ua/files/2014/10/17/sodo1.pdf>.



MINISTRY OF EDUCATION AND SCIENCE OF UKRAINE

10 Peremohi Avenue, Kiev, 01135, tel. (044) 481-32-21, fax (044) 481-47-96
E-mail: ministry@mon.gov.ua, EDRPOU code 38621185

Our No. _____ dated _____

Your No. _____ dated _____

Educational and science departments/offices
of regional and Kiev municipal public
administrations

On the organisation of education in general educational institutions for persons residing in the temporarily occupied territory in the Autonomous Republic of Crimea, Sevastopol and anti-terrorist operation locations in Donetsk and Lugansk regions

Taking into account the extraordinary events taking place in the temporarily occupied territory in the Autonomous Republic of Crimea, the city of Sevastopol and in the places of the anti-terror operation in the Donetsk and Lugansk Regions, the Ministry of Education and Science of Ukraine hereby provides its explanations on the further teaching of students and the issuance of official documents of education to graduates.

We stress that any statements made or actions taken by terrorist organisations to imitate the “educational processes” are legally null and void and will not be recognised. Similarly, **no “documents of education” issued by the occupation entities of the Russian Federation and the self-proclaimed “authorities” on the Crimean Peninsula or by the terrorists in the part of the territory of the Donetsk and Lugansk Regions under their temporary control currently have or will have in the future any legal force. Neither the Ministry of Education and Science nor any other governmental authorities in Ukraine or elsewhere will “recognise”, “nostrificate” or “exchange” any such “documents”.**

The parents of those students, especially 11th graders, residing in the temporarily occupied territory in the Autonomous Republic of Crimea, the city of Sevastopol and in the places of the anti-terror operation in the Donetsk and Lugansk Regions should be recommended to take steps to enable their children to undergo the required procedures, obtain official documents of

education and have a chance to enter vocational or higher educational institutions of Ukraine in the spring of 2015.

More specifically, under the current laws of Ukraine, those students residing in the aforementioned areas and wishing to obtain an official document of education may continue their studies in Ukraine in all forms available (such as daytime, evening, distant, external, individual or group). The procedure for admission to general educational institutions is prescribed by regulatory documents.

Given the situation that poses a threat to the life and health of children, we instruct all local educational authorities and heads of general educational institutions to help resolve the issues of admission to those institutions and the passage of the official final certification in 2015, to create the necessary conditions in advance and also to treat children in difficult life circumstances with understanding.

We draw your attention to the fact that the Regulation on Externship in General Educational Institutions as approved by Ministry of Education and Science of Ukraine Order No. 431 dated 19 May 2008 and registered by the Ministry of Justice of Ukraine on 3 June 2008 under No. 498/15189 stipulates that the possibility to pass an annual assessment for the corresponding class and a certification of their educational level corresponding to the primary, basic or complete general secondary education is granted, in particular, to those persons who are unable to attend classes in a general education institution *for any valid reasons* (Clause 1.3).

In order to pass the annual assessment and certification, in addition to an application addressed to the head of an educational institution, each extern shall also submit a document of his or her education. When passing an external annual assessment for a subject or a course of study in another educational institution, each extern shall submit a certificate signed by the head, and sealed by the seal, of the educational institution where his/her external training took place. In any extern has no document of education, the educational institution offering external training shall independently determine the educational level of such external. For this purpose, a commission shall be established by order of the head of said educational institution to consist of the head of such commission (the head or deputy head of said educational institution), and teachers of those subjects which the extern's educational level is to be determined for. The head of the commission shall draw up a schedule of events to assess the extern's knowledge in the relevant subjects. The members of the commission shall prepare a list of exercises, tasks and questions for each subject. The results of the assessment and the extern's educational level as determined based on those results shall be formalised by a protocol to be signed by all members of the commission (Clause 2.2).

The acceptance of applications from externs shall begin from October and, **as a rule**, end no later than on the 1st of March of the current academic year (Clause 2.4).

Given the situation, the foregoing entitles the heads of the educational institutions in question to decide, if necessary and as an exception, to admit an extern before the end of the academic year.

The heads of the local educational authorities and educational institutions admitting externs shall be responsible for ordering and issuing documents of general secondary education to those persons residing in the temporarily occupied territory in the Autonomous Republic of Crimea, the city of Sevastopol and in the places of the anti-terror operation in the Donetsk and

Lugansk Regions. In turn, *Inforesurs* State Enterprise will provide the most favoured treatment for carrying out this work.

We instruct you to bring this information to all heads of subordinate educational management bodies and educational institutions.

[*Signed*]

Pavel Polyansky,
Deputy Minister

A.V. Davidovich 481 47 66

[*Stamp:*

Ministry of Education and Science of Ukraine

No. 1/9-535 dated 14 October 2014

Barcode]

[*Stamp:*

Department of Education, Science, Youth and Sports

No. **063/11090** dated 15 October 2014

Barcode]

Exhibit D

RBC, *Crimean Quote* (22 July 2014)

(translation)

Translation

**RBC, *Crimean Quote* (22 July 2014), available at:
<https://www.rbc.ru/newspaper/2014/07/22/56be2aba9a7947299f72ccb2>.**

RBC Gazette

Crimean Quote

RBC Gazette No. 131 (1906) (2207) //1935 Society, 22 July 2014 at 01:25 AM

Crimean Quote

By Farida Rustamova, with assistance of Tatiana Klyonova

Applicants from the new territories will occupy state-funded places in Russian universities out of usual competition.



Photo: *ITAR-TASS*

Admission to universities is unusual this year as graduates from Crimean schools join the applicants. 18,000 thousand additional state-funded places have been allocated to them, which equals the total number of graduates. They will be admitted out of general competition and not according to the results of their Unified State Exams. The universities themselves will

choose the methods for admitting young people from the new territories, and the situation will remain the same at least in 2015.

In late April, a little more than one month after Crimea and Sevastopol joined Russia, the State Duma adopted amendments to the Law on Education, which integrates the educational systems of the new constituent entities to the all-Russian system. Under that Law, Crimean and Sevastopol school graduates will have the option in 2014-2015 to pass the Unified State Exams or the final exams in another form to be determined by the Ministry of Education and Science. This year, a vast majority of Crimean schoolchildren will enter universities without regard to the results of their Unified State Exams: only 300 out of about 18,000 graduates expressed a desire to pass the Unified State Exams, *Rossiyskaya Gazeta* quoted a statement by Minister Education and Science Dmitry Livanov. In total, according to the Ministry of Education and Science, 18,000 additional state-funded places have been allocated in universities subordinate to the Ministry to graduates from Crimea and Sevastopol this year.

Deputy Minister of Education and Science Alexander Klimov explains that Crimeans will undergo entrance tests to be specified by each university independently depending on its specialisation. The Ministry of Education and Science believes there should be at least two entrance tests. Similar rules will be applied in 2015. According to another official in charge of education, such preferential rules may remain in force in 2016.

Special privileges will be granted to the winners of the fourth stage of the all-Ukrainian student Olympiads, those Ukrainian national team members who participated in international Olympiads in general education subjects, and applicants for bachelor's and specialist's educational programmes. Under law, they are equated with the winners of the final stage of the All-Russian Schoolchildren Olympiad, and those Russian national team members who participated in international Olympiads in general education subjects.

Those Crimean and Sevastopol residents who have not completed their studies and have been expelled from Ukrainian universities after the annexation of Crimea will be admitted to the relevant training courses and educational programmes at the expense of Russia's budget.

The Ministry of Education and Science plans to extensively reform the Crimean education system. In particular, it intends to establish a federal university in Simferopol and unite several universities in Sevastopol into a single one.

Another 1,830 places in 12 universities in four federal districts, including Moscow, will be allocated to refugee graduates from South-East Ukraine, the Ministry of Education and Science said in response to a request from *RBC*. These include the Peoples' Friendship University of Russia, the North Caucasus Federal University, the Southern Federal University, etc.

Unlike Crimean graduates, refugees will be allocated places in universities from a total quota of 15,000 places intended for foreign and stateless students in 2014. Ukrainians will be admitted to universities as compatriots. Mr. Klimov says refugees will be provided with places in student dormitories and humanitarian aid.

Irina Abankina, Director of the HSE Institute for Educational Development, pointed out that the average cost of one state-funded place in a Russian university is about RUB 63,600 per year. "Talking about priority specialties, the cost is RUB 113,000 to RUB 118,000 per year",

she said, adding that those industries requiring complex equipment are more expensive. According to her, the admission of 1,500 students will only compensate for “the 0.2% demographic decline”.

The Ministry of Education and Science has not yet been replied to RBC’s inquiries regarding the cost of training Crimean and Ukrainian graduates.

Artyom Khromov, Russian Commissioner for Student Rights, is confident the preferential admission conditions for graduates of Crimean schools are absolutely logical. In the same way, foreign applicants are accepted on the basis of their interviews and additional tests. According to him, students will have to be duly trained to pass the Unified State Exams, so it is quite natural for Crimean applicants to choose the quota-based admission.

The preferential conditions do not violate equality among Russian graduates, Ms. Abankina believes. “In Ukraine, there is a state exam, and we have been accepting students for state-funded places under international treaties with the CIS countries based on quotas for years”, she explained. According to her, many countries, including Russia, provide grants and scholarships for foreigners.

“This is not the best but an inevitable solution. It is impossible to make a whole generation of children hostages of Russian foreign policy and deprive them of the opportunity to enter a university. It is reasonable that the new students will not take away places from the old ones”, Mikhail Gelfand, a professor at the Moscow State University, comments. Nevertheless, in his opinion, in order to restore justice, no further concessions should be made in the future for those who have entered on preferential terms, and then weak students will deservedly “fall off” after the first session. However, Mr. Gelfand notes, an interview, which is likely to be chosen as an alternative to examination, is potentially a more corrupt procedure than the Unified State Exams or regular exams as it has no assessment criteria.

Exhibit E

Crimean Newswire, III *“Crimean Terem House” Open Festival-Contest of Children's Folklore
Groups held in Crimea* (3 December 2018)

(translation)

Translation

Crimean Newswire, *III “Crimean Terem House” Open Festival-Contest of Children's Folklore Groups held in Crimea* (3 December 2018), available at: <https://crimea-news.com/society/2018/12/03/465715.html>.

III “Crimean Terem House” Open Festival-Contest of Children's Folklore Groups held in Crimea



The Crimean Terem Third Open Festival Contest of Children’s Folklore Groups took place from 30 November 2018 to 2 December 2018 in Simferopol, the press service of the Ministry of Education, Science and Youth of the Republic of Crimea reports.

According to the press service, over 450 performers, including children’s and youth vocal, choreographic and instrumental folklore groups and soloists from nine Crimean and Russian regions, namely the Krasnogvardeyskoye, Simferopol and Dzhankoy Districts and the cities and towns of Feodosia, Alushta, Dzhankoy, Yevpatoria, Simferopol and Penza, took part in the festival.

“The jury was headed by Igor Mikhailevsky, the artistic director of the vocal and choreographic ensemble “Tauria” of the Crimean State Philharmonic and an Honoured Artist of Ukraine and the Republic of Crimea. The contest programmes included works of various genres, including music and song, dance, game and oral folklore, instrumental music, and fragments of popular fests and rites”, the press service said.

Upon completion of the competitive auditions, the following ensembles became Degree I laureates: the folk dance ensemble “Smile” (junior group) of the Centre for Children’s Creativity in Alushta (headed by N.F. Lindegrin), who performed “Hutsul Dance” and “Belarusian Dance”; the folk song ensemble “Sudarushka” of the Simferopol School of Arts (headed by I.N. Andreichenko and led by A.V. Morgunov), which performed “Dubravushka”, the wedding majestic song of the Don Cossacks, “Mountain Roosters Sing on the Mountain”,

and the Kupala song from the Voronezh Region; the folklore ensemble “Svetlitsa” (junior group) of the Simferopol School of Arts (headed by E.S. Mirgorodskaya and led by D.A. Benko), who performed “Baiki-Pobaiki” based on maternal folklore; the exemplary folk dance group “Dance College” of the Rodnikovo Rural House of Culture in the Simferopol District (headed by L.I. Nakonechnaya), who performed “Paths” and “Greek Dance”; the folklore ensemble “Svetlitsa” of the Simferopol School of Arts (headed by I.L. Mikhailevskaya and led by D.A. Benko and E.V. Uvarov), who performed the Russian Lakeland spiritual song “How the Red Sun Climbed” and the Studyonki suffering song “Golosoček Zakatimay” from the Lipetsk Region; and the folk dance ensemble “Smile” (junior group) of the Centre for Children’s Creativity in Alushta (headed by N.F. Lindegrin), who performed “Dymkovo Toy” and “Vasya-Vasilyok”.

Exhibit F

State Budgetary General Education Institution of the Republic of Crimea “Kerch Educational Complex/Boarding School-Lyceum of Arts”, *Pearl of Crimea Dance Ensemble - Winner of the Republican Competition “Crimean Terem House”* (6 December 2019)

(translation)

Translation

State Budgetary General Education Institution of the Republic of Crimea “Kerch Educational Complex/Boarding School-Lyceum of Arts”, “*Pearl of Crimea*” Dance Ensemble - Winner of the Republican Competition “*Crimean Terem House*” (6 December 2019), available at: http://licey-iskusstv.ru/news/ansambl_tanca_zhemchuzhina_kryma_pobeditel_respublikanskogo_konkursa_krymskij_terem/2019-12-06-1123.

State Budgetary General Education Institution of the Republic of Crimea "Kerch Educational Complex/Boarding School-Lyceum of Arts"

Pearl of Crimea Dance Ensemble - Winner of the Republican Competition "Crimean Terem House"

On the 5th of December at 02:00 PM, the State Academic Music and Drama Theatre in Simferopol held a gala concert and a prize-awarding ceremony of the **Crimean Terem** Open Festival Contest of Children’s Folklore Groups.

The Festival has been founded by the Ministry of Education, Science and Youth of the Republic of Crimea. It is intended to promote the aesthetic, moral and spiritual education of the younger generation via the best examples of folk arts, preserve and continue folk performing traditions, develop national cultures, and identify and support original creative teams and soloists. This year, 93 applications were accepted for the Festival, and more than 700 young folk tradition followers aged from 6 to 18 years from different parts of the Crimea presented their performance to the jury.



The exemplary folk dance ensemble “**Pearl of Crimea**” of the Lyceum of Arts represented by its mid-age group took part in the contest for the first time. It was nominated in the category “**Choreographic Art**”.

Dance is the most ancient form of art: it is interesting, multifaceted, bright, and emotionally charging. Long time ago, folk dance became the ancestor of all future

dances such as classical, historical, pop, and modern. Fashion and the passage of time could not make folk dance disappear from the life and history of various nationalities. Until our days, every society has been sacredly preserving the memory of its previous generations and cherishing everything what reflected their lives. Therefore, dance is a priceless treasure preserving the life and traditions of various peoples. Taking in mind those specific features of folk dance, teachers of the choreographic department of the Lyceum of Arts prepared our ensemble consisting of **T.V. Mamykina**, **A.I. Tikhonenko** and **E.N. Antonova** and led by **Vera A. Ivanova**, an Eminent Culture Worker of the Republic of Crimea and an Excellent Educator of Ukraine, for the contest.



The ensemble successfully performed two dance routines at the contest – the cheerful Russian

dance “**Pritopy**” and the incendiary Ukrainian dance “**Vesyolka**”.

It also performed a Ukrainian dance among the contest’s best performers at the gala concert.

Congratulations to the students and teachers on winning the contest!

Exhibit G

YouTube, Valera Mouzyka, *Ukrainian dance "Pleskach"* (17 June 2018)

(translation)

YouTube, Valera Mouzyka, *Ukrainian dance "Pleskach"* (17 June 2018), available at: https://www.youtube.com/watch?v=s58n97jdJ-k&ab_channel=ValeraMouzyka.

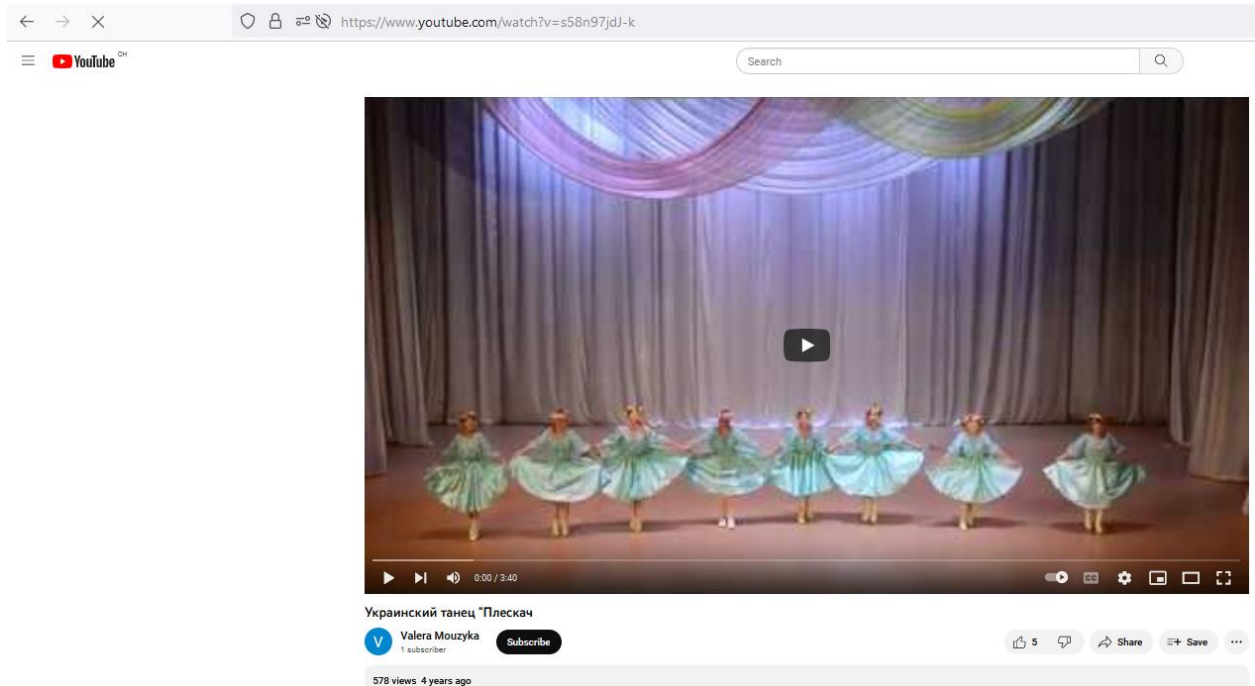
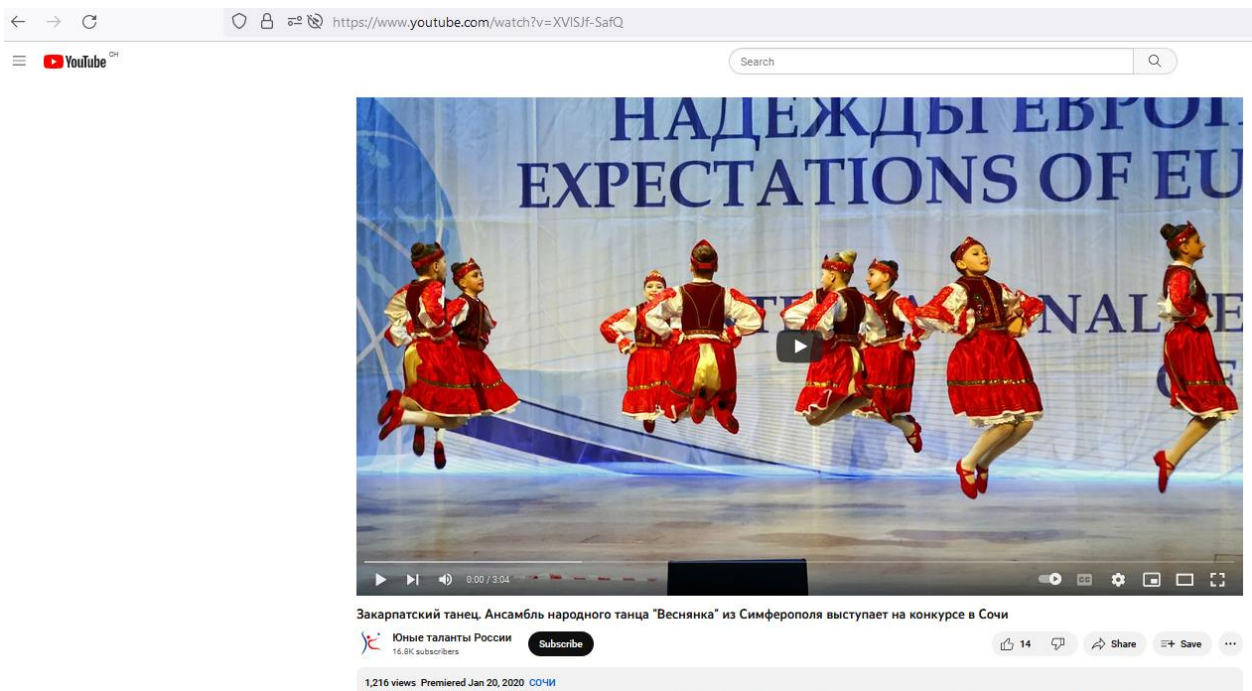


Exhibit H

YouTube, Russia's Young Talents, *Transcarpathian dance. The folk-dance ensemble "Vesnyanka" from Simferopol performs at the competition in Sochi (20 January 2020)*

(translation)

YouTube, Russia's Young Talents, *Transcarpathian dance*. The folk-dance ensemble "Vesnyanka" from Simferopol performs at the competition in Sochi (20 January 2020), available at: <https://www.youtube.com/watch?v=XVISJf-SafQ>.



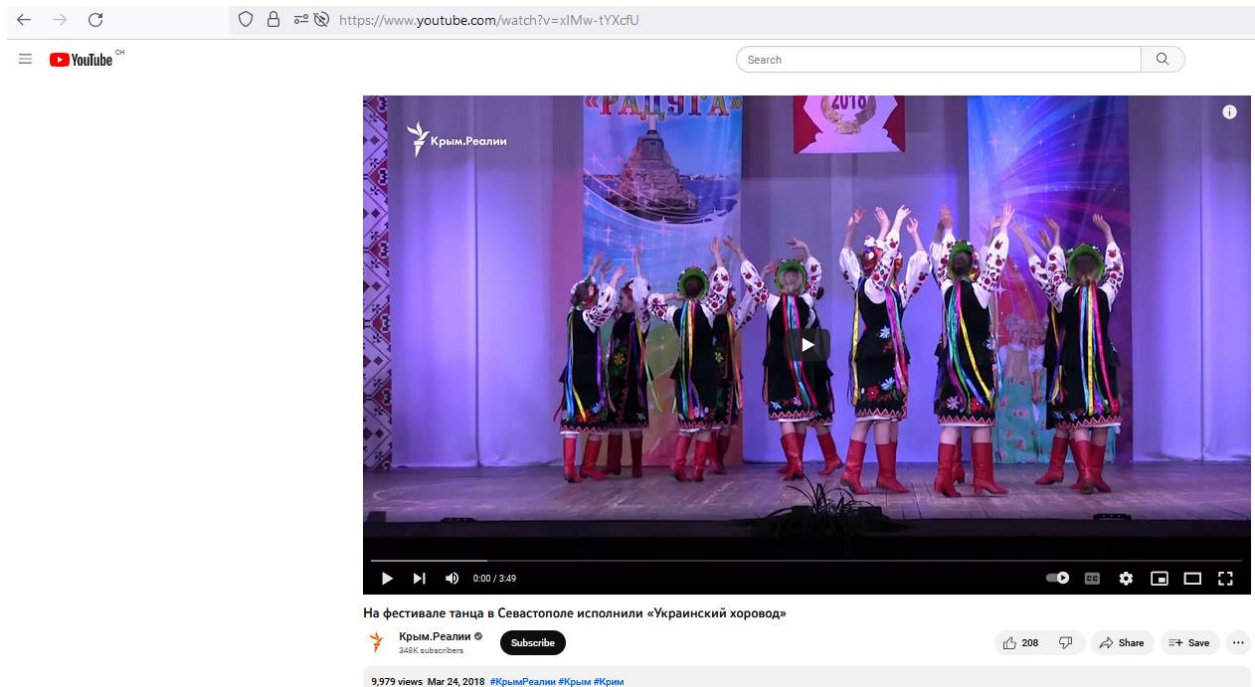
The image is a screenshot of a YouTube video player. The browser address bar shows the URL <https://www.youtube.com/watch?v=XVISJf-SafQ>. The video player shows a group of dancers in traditional red and white folk costumes performing on a stage. The background features a large banner with the text "НАДЕЖДЫ ЕВРОПЫ" and "EXPECTATIONS OF EUROPE". Below the video player, the video title is "Закарпатский танец. Ансамбль народного танца "Веснянка" из Симферополя выступает на конкурсе в Сочи". The channel name is "Юные таланты России" with 16.8K subscribers. The video has 1,216 views and was premiered on Jan 20, 2020, in Sochi.

Exhibit I

YouTube, Krym Realii, *Ukrainian Khorovod performed at Sevastopol dance festival*
(24 March 2018)

(translation)

YouTube, Krym Realii, *Ukrainian Khorovod performed at Sevastopol dance festival (24 March 2018)*, available at: <https://www.youtube.com/watch?v=xIMw-tYXcfU>.



The image is a screenshot of a YouTube video player. At the top, the browser address bar shows the URL <https://www.youtube.com/watch?v=xIMw-tYXcfU>. The YouTube logo is visible in the top left corner. The video player itself shows a group of seven performers on a stage, dressed in traditional Ukrainian folk costumes (Khorovod). They are wearing black dresses with colorful embroidery and red boots. The background features a large banner with the word "РАЦІСТ" and a year "2010". The video player controls at the bottom show a play button, a progress bar at 0:00 / 3:49, and various icons for volume, settings, and full screen. Below the video player, the video title is "На фестивале танца в Севастополе исполнили «Украинский хоровод»". The channel name is "Крым.Реалии" with 348K subscribers and a "Subscribe" button. The video has 9,979 views, was posted on Mar 24, 2018, and includes the hashtags #КрымРеалии, #Крым, and #Крим.

Exhibit J

Krym.Realii, *Ukrainian and European dances performed in Sevastopol (+video)*
(24 March 2018)

(translation)

Translation

Krym.Realii, *Ukrainian and European dances performed in Sevastopol (+video)* (24 March 2018), available at: <https://ru.krymr.com/a/news/29121649.html>.

Ukrainian and European dances performed in Sevastopol (+video)

Krym.Realii

On the 24th of March, the 23rd citywide dance festival began in Sevastopol, featuring various choreographic ensembles from the annexed Crimea, a ***Krym.Realii*** correspondent reports.

The event was held in the Sevastopolsky Palace of Culture in the suburban village of Sakharnaya Golova. It was organised by the Palace's administration in conjunction with the administration of Sevastopol's Russian Balaklava municipality.

On the first day of the festival, Russian, Ukrainian and Moldovan folk dances as well as European classical, Chinese and Kazakh dances were performed.

The folk dance ensembles "Sudarushka" and "Sevastopol" and the Sak-based ensemble "Crimean Pearls" performed the "Ukrainian Round Dance" in a modern arrangement, the "Hutsul Dance" and the dance composition "Screaming for Spring" based on Ukrainian folk motifs, respectively.

At the end of the first day of the festival, the organisers presented certificates to those ensembles which performed folk and classical dances.

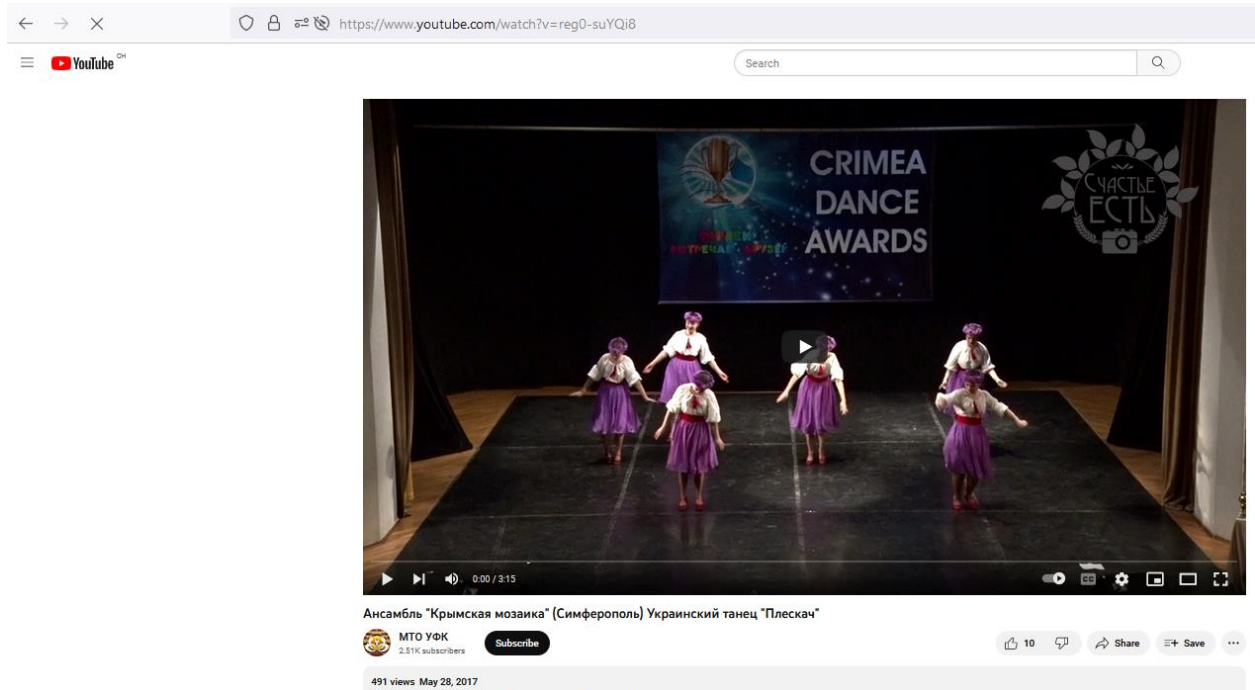
On Sunday, the 25th of March, pop dances will also be performed in the Sevastopol Palace of Culture.

Exhibit K

YouTube, MTO UFK, *Crimean “Mozaica” Ensemble (Simferopol) performs Ukrainian dance
“Pleskach” (28 May 2017)*

(translation)

YouTube, MTO UFK, Crimean “Mozaica” Ensemble (Simferopol) performs Ukrainian dance “Pleskach” (28 May 2017), available at: <https://www.youtube.com/watch?v=reg0-suYQi8>.



Annex 26

Witness Statement of [REDACTED], 2 March 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

WITNESS STATEMENT OF

[REDACTED]

2 MARCH 2023

1. My name is [REDACTED], and I declare the following.
2. [REDACTED]
[REDACTED] (hereinafter, “School No. 20”).
3. Some time earlier, [REDACTED], a teacher of School No. 20, gave her witness statement in support of Russia’s Counter-Memorial on the dispute with Ukraine before the International Court of Justice (hereinafter, “First Witness Statement”). She described in it, among others, the following issues:
 - (a) The operation of the Municipal Budgetary Educational Institution “School No. 20 of the city Feodosiya, Republic of Crimea” (hereinafter, “School No. 20”);
 - (b) Trends in the number of students in School No. 20 and their interest in learning the Ukrainian language;
 - (c) Number of lessons provided in the Ukrainian language programme;
 - (d) Extracurricular activities for students related to the use of the Ukrainian language.
4. I fully agree with what [REDACTED] told you, and can add a little to her witness statement to provide the International Court of Justice with a picture of what has been happening in our school over the past two years since [REDACTED] gave her witness statement. In my witness statement, I will rely on the facts known to me as the acting principal of School No. 20, either directly or from those around me.
5. I have examined the relevant passages from Ukraine’s Reply to the Russian Federation’s Counter-Memorial concerning School No. 20 and the study of Ukrainian language in Crimea, and in my view the assertions there are not entirely true. Ukraine, referring to the witness statement of [REDACTED], for example, states that only a limited number of hours are allocated to studying the Ukrainian language, and only for some classes, and that Ukrainian is not a language of instruction, but only a language of additional study. Thus, Ukraine, in my opinion, quoted [REDACTED] witness statement incorrectly and selectively. Ukrainian is the language of instruction, as [REDACTED] points out in her witness statement. In addition, all classes in School No. 20 study the Ukrainian Language and Literature (1 to 11 grades).

6. Ukraine, referring to Clement's witness statement, claims that children who study Ukrainian or are taught in Ukrainian are bullied and physically abused by their classmates, and that teachers do not prevent this in any way. There are absolutely no such incidents at School No. 20; furthermore, I, as someone familiar with the study of the Ukrainian language in Crimea, am unaware that such incidents ever existed in other schools in Crimea, including School No. 13 in Yevpatoria, which is listed in Clement's witness statement.
7. Moreover, Ukraine points out that teachers at a school in Crimea allegedly hand out pre-filled questionnaires to parents with Russian as the language of education, thereby encouraging parents to choose. This information does not seem reliable to me, as in School No. 20, for example, the choice of the language of instruction and the language of study is absolutely free and does not depend on the teachers' preferences. I have not seen any cases of compulsion to study in Russian in other schools I know in Crimea.
8. I would also like to report that a number of changes for the better have been taking place at School 20 thanks to the additional public funding. The long-awaited process of renovation of the school building is a big event. In 2022, the administration of Feodosiya allocated a plot of land on which to build a new building for School No.20, which will accommodate over 300 students. It is planned to be a prefabricated building with a sports ground and a playground. At present, the issue of appropriation of 500 million roubles for its construction is being resolved and, as far as I know, the administration supports us in our need for a new building.
9. Compared to previous school years, the number of students has increased this year. There are now 207 children in School No. 20.
10. At the same time, the school continues to hold regular extracurricular activities related to the Ukrainian language. In March 2022, for example, in honour of the birthday of the great Ukrainian poet Taras Shevchenko, our school held an event called "Shevchenko's Days"; we annually participate in the "Language is the Spirit of Nation".
11. High quality of Ukrainian language instruction in the school is also confirmed by the fact that many of our students plan to take their final exams in Ukrainian.

12. We would also like to point out that we welcome the use of the Ukrainian language and respect the traditions of the Ukrainian people. Official events at School No. 20 are bilingual - both in Ukrainian and Russian. We also honour holiday customs: this year we are going to celebrate St Nicholas Day on 19 December and build a traditional nativity scene.
13. As far as the teaching process, I would like to point out that the process in Ukrainian is based on textbooks published during the Ukrainian period. All the textbooks have been certified by the interdepartmental commission set up in 2014 and are available in our school library. I have personally seen these textbooks.
14. I hereby confirm that, to the best of my knowledge and beliefs, the information set out in this witness statement is true.

Witness

[Signature] _____



Feodosiya, 2 March 2023

Annex 27

Witness Statement of [REDACTED], 18 February 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

WITNESS STATEMENT OF

[REDACTED]

18 FEBRUARY 2023

1. I, [REDACTED], hereby declare as follows:
2. I am [REDACTED]
[REDACTED] Previously, I also worked as [REDACTED]
[REDACTED]
3. In the present witness statement I will respond to a number of allegations made by Ukraine in the Memorial and Reply to the Counter-Memorial of the Russian Federation in the proceedings before the International Court of Justice initiated by Ukraine. In particular, I will highlight the following issues:
 - (a) Activities of the Crimean Tatar media in Crimea;
 - (b) The role of the Mejlis of the Crimean Tatar People and claims that it represents the interests of Crimean Tatars;
 - (c) Blockade of Crimea organised by former Mejlis leaders Refat Chubarov, Mustafa Dzhemilev, Lenur Islyamov;
 - (d) Access of the Crimean Tatar population to public service in the Russian Federation;
 - (e) The ability of Crimean Tatars to hold mass events.
4. By virtue of the fact that I have lived in Crimea all my life and am also a Crimean Tatar woman, I have a comprehensive understanding of the above-mentioned issues. This witness statement is based on [REDACTED]
[REDACTED].

A. CRIMEAN TATAR MEDIA IN CRIMEA

5. As for the work of the Crimean Tatar media in Crimea, it should be noted that they are widely and fully represented. At the moment, in the territory of the Republic of Crimea the Crimean Tatar public television and radio company “Millet” is operating. Its holding company also controls the radio station “Vatan Sedasy”.¹ The most popular republican channel “Krym-24” broadcasts the special project “Key Point: The Crimean Tatar Issue”

¹ As far as I understand, the Russian Federation has provided detailed information on Millet and the programmes and broadcasts it produces in Annex 498 to the Counter-Memorial.

every Friday in prime time.² That platform was created to discuss the burning political, social, economic and cultural issues of Crimean Tatars in Crimea. The Mediacentre n.a. I. Gasprinsky is also actively working. It is a structural subdivision of the State Committee on Inter-Ethnic Relations of the Republic of Crimea. The following Crimean Tatar publications are issued under aegis of the Center: Yany Dyunya,³ Meraba,⁴ Yildiz,⁵ Ana Tili Odzhalaryna,⁶ and Arzy.⁷ Also, the newspaper “Golos Kryma” is published in Crimea.⁸ It originated in the early 1990s. Since then, its permanent editor is a Crimean Tatar – Eldar Seitbekirov. The newspaper is not part of any state holdings and is published on a self-sustaining basis.

6. In 2015, the newspaper was licenced under the new Russian requirements,⁹ although it did not outline its open position with regard to the referendum and the Russian authorities in Crimea. In this context, it is worth stressing that the broadcasting or publishing licence was granted to all who really wanted it, regardless of language and thematic content.
7. The ATR TV channel, on the contrary, took an extremely aggressive, unconstructive stance from the very beginning of the events of 2014. The channel covered the events in a very biased way, openly intimidating Crimean Tatars with their stories and hysterical presentation of the facts.¹⁰ This has undoubtedly affected, among other things, the state of health of many elderly Crimean Tatars.

² See for example, Krym 24, #KEYPOINT #CRIMEANTATARISSUE (10 February 2023), available at: <https://crimea24tv.ru/content/glavnoe-krimskotatarskiyvopros-11/> (Exhibit A).

³ Mediacentre n.a. I. Gasprinsky, *Archive of the “Yany Dyunya” newspaper*, available at: <https://mediacentr.org/ru/arhiv-gazety-yany-dyunya/> (Exhibit B).

⁴ Mediacentre n.a. I. Gasprinsky, *Archive of the “Meraba” newspaper*, available at: <https://mediacentr.org/ru/gazeta-meraba/arhiv-gazety-meraba/> (Exhibit C).

⁵ Mediacentre n.a. I. Gasprinsky, *“Yildiz” Magazine*, available at: <https://mediacentr.org/ru/zhurnal-jyldyz/> (Exhibit D). Archive of the “Yildiz” magazine, available at: <https://disk.yandex.ru/d/cTMRLZBXNsPkow?w=1> (Exhibit E).

⁶ For example, a manual for teachers of the Crimean Tatar language and literature has been produced, see Mediacentre n.a. I. Gasprinsky, *For teachers of the native language: a scientific-methodological guide for teachers of the Crimean Tatar language and literature. No. 1 (15)* (16 July 2018), available at: <https://mediacentr.org/ru/2018/07/16/ana-tili-odzhalaryna-kyrymtatar-tili-ve-edebiyaty-odzhalary-ichyun-ilmij-usulij-medzhmua-1-15/> (Exhibit F).

⁷ Mediacentre n.a. I. Gasprinsky, *Arzy*, available at: <https://mediacentr.org/ru/arzy/> (Exhibit G).

⁸ Golos Kryma, *Homepage* (17 February 2023), available at: <http://goloskrimanew.ru/> (Exhibit H).

⁹ Roskomnadzor, Certificate No. FS 77-60738, 11 February 2015, available at: <https://rkn.gov.ru/mass-communications/reestr/media/?id=538108&page=> (Exhibit I).

¹⁰ RIA Novosti, *Aksyonov: Incitement to Hatred in Crimea is unacceptable at this difficult time* (19 March 2015), available at: <https://ria.ru/20150319/1053392148.html> (Exhibit J).

8. I do not rule out that the former management of the ATR TV channel, in particular Lenur Islyamov, simply wanted to use the fact of the termination of broadcasting to put pressure on the public and international structures, as well as to obtain funding from the Ukrainian authorities, as we have subsequently observed.
9. It should be noted that, over time, some of ATR's management and staff (in particular, Elzara Islyamova, deputy general director of ATR, and Liliya Budzhurova, editor and presenter of ATR) have opened a Karadeniz Production studio, and an internet site¹¹ which are still operating, and there is no talk of blocking them. These organisations also regularly hold various kinds of events without any obstacles, such as organising a large-scale annual Crimean Tatar book fair¹² and holding meetings for their resources with Crimean Tatar opinion leaders, historians, artists¹³ etc.
10. Another example is the work of Canli production studio in Crimea.¹⁴ Its head, Nadzhie Femy, is also one of those who did not support the events of 2014. She went to Kiev several times and held all sorts of talks there. But in the end she chose Crimea. At the end of 2022, she received a distribution certificate for the screening of her film "Obsessed", based on historical events.¹⁵
11. Thus, there are numerous media outlets covering the Crimean Tatar agenda in Crimea. These include both those that were freely re-registered after 2014 and those that have appeared relatively recently. All of them operate independently, choose their own thematic episodes for coverage, and the state authorities do not hinder their activities.

¹¹ Crimeantatars.club, *Homepage* (17 February 2023), available at: <https://www.crimeantatars.club/> (Exhibit K).

¹² Crimeantatars.club, *IV Crimean Tatar Book Fair is the Brightest Event of Autumn 2022* (13 September 2022), available at: <https://www.crimeantatars.club/culture/literature/iv-krymskotatarskaya-knizhnaya-yarmarka-samoe-yarkoe-sobytie-oseni-2022> (Exhibit L).

¹³ See for example, Crimeantatars.club, *Full video of meeting with journalist and writer Zera Bekirova* (20 November 2020), available at: <https://www.crimeantatars.club/life/society/polnaya-videoversiya-vstrechi-s-zhurnalistom-i-pisatelem-zeroj-bekirovoj> (Exhibit M). Crimeantatars.club, *Meeting with coppersmith master Rustem Dervish (full video)* (28 May 2022), available at: <https://www.crimeantatars.club/life/people/vstrecha-s-rustemom-dervishem-polnaya-versiya> (Exhibit N). Crimeantatars.club, *Meeting with Crimean Tatar national movement veteran Arsen Alchikov (video)* (30 August 2020), available at: <https://www.crimeantatars.club/life/society/vstrecha-s-veteranom-natsionalnogo-dvizheniya-arsenom-alchikovym-videoversiya> (Exhibit O).

¹⁴ Canli.online, *CANLI – a new generation of Crimean Tatar media*, available at: <https://canli.online/about/> (Exhibit P).

¹⁵ Ministry of Culture of the Russian Federation, "The Possessed" Film Distribution Certificate No. 111030522, 8 November 2022, available at: <https://culture.gov.ru/services/reestr-prokatnykh-udostovereniy/5750863/#> (Exhibit Q).

B. MEJLIS

12. Regarding the activities of the Mejlis, it should be noted that Mustafa Dzhemilev literally usurped power in this structure from the outset. Were there any alternatives? Yes, of course there were. A bright and promising leader of the NMCT (an alternative branch of the national movement) was Yury Osmanov. But he was brutally assassinated in 1993.¹⁶ The masterminds are unknown to this day. After that, there was a wave of political murders among Crimean Tatars, including a brutal massacre of Norik Shirin in 2006.¹⁷ The vibrant and charismatic leader of the increasingly popular Birlik/Unity movement, did not take instructions from the Mejlis and was an advocate of constructive cooperation of all the peoples of Crimea. What is important, the killings were carried out with deliberate brutality to intimidate other activists. The entire policy of the Mejlis was aimed at forming a protest mob out of the Crimean Tatars. Their slogans and provocations had only one objective – to keep the people in tension, permanent anger and fear.
13. Separately, I will address the “democratic nature” and alleged legitimacy of the structure. The Mejlis was illegitimate, in the political life of Ukraine, too. Throughout the entire period from 1991 to 2014, there was not a single Ukrainian document that in any way regulated its activities in Ukraine!
14. As for so-called “peoples” legitimacy. The Crimean Tatar People's Assembly (Qurultay) was formed on an electoral basis. The elected Qurultay formed the Mejlis. Initially the Qurultay was elected according to the formula: 30-35 voters – 1 elector, 30 electors – 1 delegate (thus, 1 delegate in the Qurultay represented about 1000 Crimean Tatars), and then according to a two-stage system – 50 voters elected an elector and 20 electors – 1 delegate.¹⁸ National politicians constantly asked for a review of the electoral system, because this outdated model was not transparent and did not provide objective representation; the system allowed monstrous falsifications in the election of electors,

¹⁶ Taurica.net, *The Forgotten Leader of the Crimean Tatar People – Dead Opponent of Dzhemilev in the Early 1990s* (9 December 2016), available at: <https://taurica.net/238739-Zabytyiy-lider-krymsko-tatarskogo-narodapogibshiy-protivnik-Dzhemileva-v-nachale-90-h.html> (Exhibit R).

¹⁷ Gazeta.ua, *Norik Shirin Killed in Garage* (21 December 2006), available at: https://gazeta.ua/ru/articles/ukraine-newspaper/_norika-sirina-ubili-v-garazhe/144219 (Exhibit S).

¹⁸ Milli Firka, *Nothing Is Worse Than Someone Else's Rightness, Nothing Is Better Than One's Mistakes* (12 October 2010), available at: <http://milli-firka.org/нет-ничего-хуже-чужой-правоты-нет-ничего/> (Exhibit T).

which the interested persons constantly used.¹⁹ The apogee was 2006, when a group of Qurultay delegates insisted on reform, but the leaders of the Mejlis completely rejected the introduction of a direct voting system.²⁰ It demonstrated once again the domination of the principles of self-interest rather than objectivity of Mustafa Dzhemilev and Refat Chubarov.

15. Case with voting system and many other decisions of Dzhemilev and Chubarov prompted the departure of a group of prominent Crimean Tatar politicians from the Qurultay-Mejlis system. At the 5th session of the 5th convocation of the Qurultay on 12 January 2013, a reform was carried out and a new “Regulation on Elections” adopted.²¹ The bizarre document was criticized, both during and after the election, by almost everyone – opposition members, electoral actors, and the Committee of Voters of Ukraine. Everything was done to prevent the growth of the number of delegates from public forces.
16. Thus, the attempt to create and develop Crimean Tatar political parties was defeated. It is clear why. Mustafa Dzhemilev was always very afraid of competition, so he had always tried to get rid of his opponents by all means. In general, the electoral system was very complicated and completely incomprehensible to ordinary people.
17. First, the elections to the Qurultay were stretched out over several months! No one clearly understood where and how to vote. Secondly, there was no transparent system of control over voting and counting. Thirdly, a mixed voting system for election of delegates was in place.
18. Under the new system, part of the delegates to the Qurultay were elected under the majoritarian system and part under the proportional system. Without widespread outreach (which was lacking), the older generation did not understand according to which system one or another candidate should be elected. From the outside, the last elections to the Qurultay were the least reminiscent of a genuine expression of the people’s will. The victory depended not on the real support of the people, but on the agility and recognition

¹⁹ *Ibid.*

²⁰ *Ibid.*

²¹ Qurultay of the Crimean Tatar People, Regulation “On the Election of Delegates of the Qurultay of the Crimean Tatar People”, 12 January 2013, available at: <http://web.archive.org/web/20140323224623/http://qtmn.org/положение-о-выборах-делегатов-курултая-крымскотатарского-народа> (Exhibit U).

of undercurrents and procedural tricks by the participants in the process. The irregularities on the days of voting itself were colossal.²² Voters were driven to the polling stations, ballot papers were issued in packs, dots were placed on the ballot papers opposite the correct candidates, voters were allowed to vote without a passport, the same polling stations were listed in different districts, and in some polling stations they did not even think to set up voting booths.

19. The observers had the least luck. In the Kirov district or Alushta, for example, they were simply pushed out of the station. If before 2006, elections to the Qurultay were considered successful with a minimum of 50% of voters participating, between 2006 and 2013 it was only a third. And under the new Regulations of 12 January 2013, it did not matter how many people came to vote – it was the relative majority that decided the matter.
20. The efforts of the Crimean Branch of the Committee of Voters of Ukraine (CB CVU) require special attention.²³ In the beginning of the race they strongly criticised the organisation and course of the election, but with each successive stage their tone became softer. What was the reason for this? Was it because the organisers had managed to improve in such a short space of time, or was it simply because they were able to strike a bargain?
21. The summing up of the CB CVU's findings on the Qurultay elections in 2013 is interesting. On the whole, the following characteristic was given: "The Crimean Tatar Qurultay election in most polling districts were without any significant violations but had some organisational drawbacks that led to infringement on the voters' rights to express their will in certain localities."²⁴ But in the end the head of the CB CVU Andrey Krisko noted as follows: "Considering the level of political tolerance demonstrated by the subjects of the electoral process in this election, if the tangle of organisational problems

²² Crimea24.info, *Exceptional Violations Noted during Crimean Tatar Qurultay Elections* (14 May 2013), available at: <https://crimea24.info/2013/05/14/na-vyborakh-v-kurultajj-krymskikh-tatar-zafiksirovali-unikalnye-narusheniya-pravil-vyborov/> (Exhibit V). Milli Firka, *Wide-Scale Violations During Qurultay Election* (19 June 2013), available at: <http://milli-firka.org/выборы-делегатов-курултая-прошли-с-ма/> (Exhibit W).

²³ Public organisation monitoring elections in Ukraine.

²⁴ Milli Firka, *Their Qurultay Election Passed* (30 July 2013), available at: <http://milli-firka.org/прошли-выборы-их-курултая/> (Exhibit X).

is removed and the regulatory framework is improved, all performance indicators of the next Qurultay election can be significantly closer to the standards of electoral law.”²⁵

22. It is therefore inappropriate to say that the Qurultay formed in this way and thus the Mejlis had total or any meaningful support among Crimean Tatars. The so-called leader Mustafa Dzhemilev himself and his system were harshly criticised and questioned long before the events of 2014.²⁶ Nor was he perceived as a moral leader. As his corrupt schemes, empty promises and separation of himself from the people were already evident. But he managed to find individual associates: politicians, businessmen, journalists and his security forces loyal to him personally. Using various resources, they provided him with media exposure and perceived support.
23. After 2014, Mustafa Dzhemilev and Refat Chubarov have been actively calling for mass resistance actions by Crimean Tatars. But there is no need or any meaningful reason for Crimeans to hold such actions.
24. Representatives of the Mejlis used various methods and means to suppress criticism. For example, as [REDACTED], I personally was repeatedly subjected to pressure and threats from Refat Chubarov and his entourage. After 2014, I have regularly been receiving messages of an insulting and humiliating nature. In addition, I receive messages on behalf of anonymous users saying “Pack your bags, we will be there soon.”
25. There are no specific results of the activities of the Mejlis. Before 2014, the Crimean Tatar language in Crimea was not recognised as a state language by Ukraine, there were huge difficulties with the native language in the school system, there was no proper representation of Crimean Tatars in the government, etc. The Mejlis did nothing to change this situation. They did not achieve any more or less meaningful social or political results through their activities.

²⁵ *Ibid.*

²⁶ ZN.UA, *Authoritarian democracy* (26 December 1997), available at: https://zn.ua/politics_archive/avtoritarnaya_demokratiya.html (Exhibit Y); E. Muedinov, Report Chairman of the Review Committee of Qurultay (Avdet newspaper, No. 23(186) 31 December 1997), see Milli Firka, *Who and How Ripped Off the People in the Mejlis* (25 March 2011), available at: <http://milli-firka.org/кто-и-как-в-меджлисе-обворовывал-народ/> (Exhibit Z).

26. Regarding corruption. Since the early 1990s, large amounts of humanitarian aid have come from the foreign Crimean Tatar diaspora (mainly from Turkey). Both financial and material. But that aid ended up in the pockets of Dzhemilev and his associates.²⁷
27. On Krym-24 TV, Special Project “Key Point: The Crimean Tatar Issue” (broadcast on 3 February 2023), the head of the Federation of Crimean Tatar Cultural Societies of Turkey, Unvar Sel, said that Crimean Tatars started returning to their homeland in Crimea from exile in 1989. Two years later, the Soviet Union collapsed and the Crimean Peninsula became part of the already independent Ukraine. Since that time, the assistance of Turkey to our compatriots in Crimea increased dramatically. A significant part of this assistance was provided by the Turkish state. Crimean Tatars in Turkey also collected aid through Crimean associations and delivered it to Crimea. Mustafa Dzhemilev took responsibility for a significant portion of these receipts. However, many events ostensibly for the benefit of the Crimean Tatar people were not successful. The biggest problem for Crimean Tatars was housing. Aid was sent to Crimea from Turkey for this purpose. As a result, there are no houses and no funds. Over the years, much of the humanitarian aid collected from Turkey and sent to Mustafa Dzhemilev was distributed around himself. Those who sent the aid witnessed that much of it was sold at markets and handed over to wholesalers.
28. Mustafa Dzhemilev and his company profited from Crimean Tatars for years. While Crimean Tatar society was in poverty, they got rich, including through fraud with funds coming from Turkey. Mustafa Dzhemilev has transformed from an uneducated man to a man who now owns luxury cars, villas and flats in Kiev, Istanbul, Cyprus and London, companies that do business with Europe, Canada and the USA. He has registered most of them in the name of other people – his wife, his friends, his drivers. Today, he has set up “coordination offices” outside associations in Turkey. Through them, he seeks ways to turn the war into a booty, supplying arms and aid to the Ukrainian army. It is time to put an end to these structures enriching themselves at the expense of the suffering and despair of Crimean Tatars. The Turkish state must also take responsibility in this regard and set up a team to investigate the fate of the aid and money sent. Nothing should be a secret

²⁷ Millie Firka, *How Dzhemilev Ripped Off Three Orphans* (12 October 2013), available at: <http://millie-firka.org/как-джемилев-трех-сирот-обокрал/> (Exhibit AA).

anymore. Those who have plundered the values of Turkish and Crimean Tatar society for years must be held accountable to the public.²⁸

29. I will give just one example of mismanagement and waste of humanitarian money. In the late 1990s, on the initiative of a prominent figure of the Crimean Tatar diaspora in Turkey and a prominent doctor, Ahmet Ihsan Qirimly, the idea of creating a children's hospital in Crimea arose. He found and transferred money for this purpose to the Crimea Foundation (which was under the personal control of Mustafa Dzhemilev). He, in turn, found a building in Simferopol district and bought it. However, it soon became clear that the building was neither functionally or infrastructurally suitable for a children's hospital.²⁹ Some work was done, but even after them the building could not be used as a medical facility. Moreover, the author of the idea, a Turkish philanthropist, sent very expensive equipment, including Crimea's first CT scanner and other medical equipment, as charitable aid.

C. THE BLOCKADE OF CRIMEA

30. In the autumn of 2015, a blockade of Crimea was initiated by representatives of the Mejlis leaders, so Mustafa Dzhemilev, Refat Chubarov, Lenur Islyamov.³⁰ First, it was economic, then power lines were blown up.³¹ The terrorist attacks on power lines resulted in the peninsula being de-energised. Representatives of the Mejlis, in particular Lenur Islyamov, through their resources and their people in Crimea, tried to organise informational support for this act.³² They tried to present the situation as if the Crimean Tatars were rejoicing at the blackout, and with the lights would come Ukraine. However,

²⁸ VKontakte, Crimea24.tv, *Mustafa Dzhemilev sold most of the humanitarian aid handed over from Turkey to Crimean Tatars* (3 February 2023), available at: https://vk.com/crimea24tv?z=video-116028735_456268795%2F368833c9596954b4ed%2Fpl_post_-116028735_170054 (Exhibit AB).

²⁹ Politnavigator.net, *Erdogan is suggested to initiate an investigation into the theft of Turkish money by the Mejlis leadership* (7 February 2023), available at: <https://www.politnavigator.net/ehrdoganu-predlagayut-iniciirovat-rassledovanie-vorovstva-tureckikh-deneg-medzhlisovskojj-verkhushkojj.html> (Exhibit AC).

³⁰ RIA Novosti (Crimea), *How Crimea Was Tempered: Five Blockades in the Peninsula's Modern History* (28 February 2019), available at: <https://crimea.ria.ru/20190228/1116152860.html> (Exhibit AD).

³¹ *Ibid.* See also RBC, *Crimea's Shutdown: The Threat of an Energy Blockade to the Republic* (22 November 2015), available at: <https://www.rbc.ru/society/22/11/2015/5651b8cf9a79474f3a9e0f59> (Exhibit AE).

³² Odessa Crisis Media Center, *Lenur Islyamov: We Will Return Crimea Within 2016* (25 December 2015), available at: <https://web.archive.org/web/20160207145939/http://www.odcrisis.org/lenur-islyamov2/> (Exhibit AF). Youtube, ATR TV, *The Civil Blockade of Crimea: How it All Started 3 Years Ago and What the Outcome Was* (21 September 2018), available at: https://www.youtube.com/watch?v=_2J5XG_qgjs (Exhibit AG).

most of Crimean Tatars live in the countryside.³³ Most families have many children. Elderly people and young children live in the same house. How could people be happy in such conditions? Not all villages had gas back then. Naturally, houses with electric heating were left to freeze to death in the already cold season. Moreover, the blockade has affected all areas of life, for example, people had extreme difficulty in organising funeral events. The organisation of the energy and water blockade had a direct negative impact on the quality of life of Crimean Tatars, led to an increase in morbidity and the exacerbation of chronic diseases.

D. ACCESS OF THE CRIMEAN TATAR POPULATION TO PUBLIC SERVICE IN THE RUSSIAN FEDERATION

31. Crimean Tatars enter the service of state bodies of the Russian Federation. If they “considered Crimea to be part of Ukraine”, they would certainly not have made such career decisions. Crimean Tatars are represented as deputies in some ministries and in most district administrations. There are two Crimean Tatar deputies in the State Council of the Republic of Crimea, so Edip Gafarov and Chinghiz Yakubov.³⁴ One of them is Edip Gafarov – Deputy Chairman of the State Council of Crimea.³⁵ Crimean Tatars are also represented in the municipal deputy bodies. In all sectors of the economy Crimean Tatars are involved and successfully carry out their activities.
32. Emiraly Ablayev – Mufti of Muslims of Crimea – has held this position consistently since 1999. On 27 October 2018, by an open vote of the delegates of the VI Qurultay of Muslims of Crimea, he was re-elected Mufti of the Republic of Crimea and Sevastopol. To call him a renegade or a “derelict” is something only someone very distant from Crimean realities can do. Also in 2018, the Council (Shura) of the Crimean Tatars under the Head of the Republic of Crimea was established by decree of the Head of the Republic of Crimea. Candidates for the Council were chosen during the meeting of the VI Qurultay of Crimean Muslims. Emiraly Ablayev is the deputy chairman of this structure. The

³³ Federal State Statistics Service, RESULTS OF THE POPULATION CENSUS IN THE CRIMEAN FEDERAL DISTRICT (Russian Institute of Statistics, 2015), available at: https://rosstat.gov.ru/storage/mediabank/KRUM_2015.pdf (Exhibit AH), p. 109.

³⁴ State Council of the Republic of Crimea, *Edip Gafarov*, available at: <http://crimea.gov.ru/deputy/285> (Exhibit AI). State Council of the Republic of Crimea, *Chinghiz Yakubov*, available at: <http://crimea.gov.ru/deputy/394> (Exhibit AJ).

³⁵ State Council of the Republic of Crimea, *Edip Gafarov*, available at: <http://crimea.gov.ru/deputy/285> (Exhibit AI).

Council is a representative body broadcasting the interests and key problems of Crimean Tatars in Crimea. The members of the Council actively debunk lies from abroad about Crimean Tatars in Crimea. The organisation has its own reception room. They receive citizens on a weekly basis and also accept applications remotely. They deal, among other things, with issues related to the everyday living conditions and obtaining the necessary documents.

E. THE ABILITY OF CRIMEAN TATARS TO HOLD MASS EVENTS

33. How credible is the thesis that Russia is blocking events/assemblies of Crimean Tatars? The thesis is untrue. Russia does not block the holding of events/assemblies of Crimean Tatars, if they are declared in compliance with the procedure. For sure, the mass event of the Day of Remembrance of the Victims of Deportation on 18 May in the territory of Crimea was moved from Lenin Square in Simferopol, but an alternative venue was proposed in a historically significant place for Crimean Tatars. The event has been used for decades as a political platform for the Mejlis leaders,³⁶ rather than as an opportunity to commemorate the victims of the deportation. Now Crimean Tatars are not restricted in their right, for example, to go to Lenin Square in Simferopol on the evening of 17-18 May and light a memorial candle. Or visit the Syuren Memorial Complex (erected by Russia), where mourning events are held every year.³⁷ Or simply come to the mosque and pray for the victims of that tragedy.
34. I hereby confirm that, to the best of my knowledge and beliefs, the information set out in this witness statement is true.

Witness

³⁶ Milli Firka, *Mejlis wants Mogilev's resignation* (7 May 2013), available at: <http://milli-firka.org/меджлисмены-хотят-отставки-могилева/> (Exhibit AK).

³⁷ RIA Novosti, *The 75th Anniversary of the Deportation of Peoples from Crimea: Remembrance Events at the Syuren Memorial* (18 May 2019), available at: <https://crimea.ria.ru/20190518/1116661184.html> (Exhibit AL). Crimean Tatar Museum of Cultural and Historical Heritage, *Events in Memory of Victims of Deportation of Peoples from Crimea Held at Syuren Station* (18 May 2022), available at: <https://krtmuseum.ru/18-maya-den-pamyati-zhertv-deportatsii-narodov-kryma/> (Exhibit AM).

[Signature] _____



Simferopol, 18 February 2023

LIST OF EXHIBITS

Number:	Name of exhibit:
Exhibit A	Krym 24, #KEYPOINT #CRIMEANTATARISSUE (10 February 2023).
Exhibit B	Mediacentre n.a. I. Gasprinsky, <i>Archive of the “Yany Dyunya” newspaper.</i>
Exhibit C	Mediacentre n.a. I. Gasprinsky, <i>Archive of the “Meraba” newspaper.</i>
Exhibit D	Mediacentre n.a. I. Gasprinsky, <i>“Yildiz” Magazine.</i>
Exhibit E	Archive of “Yildiz” magazine.
Exhibit F	Mediacentre n.a. I. Gasprinsky, <i>For teachers of the native language: a scientific-methodological guide for teachers of the Crimean Tatar language and literature. No. 1 (15) (16 July 2018).</i>
Exhibit G	Mediacentre n.a. I. Gasprinsky, <i>Arzy.</i>
Exhibit H	Golos Kryma, <i>Homepage (17 February 2023).</i>
Exhibit I	Roskomnadzor, Certificate No. FS 77-60738, 11 February 2015.
Exhibit J	RIA Novosti, <i>Aksyonov: Incitement to Hatred in Crimea is unacceptable at this difficult time (19 March 2015).</i>
Exhibit K	Crimeantatars.club, <i>Homepage (17 February 2023).</i>
Exhibit L	Crimeantatars.club, <i>IV Crimean Tatar Book Fair is the Brightest Event of Autumn 2022 (13 September 2022).</i>
Exhibit M	Crimeantatars.club, <i>Full video of meeting with journalist and writer Zera Bekirova (20 November 2020).</i>
Exhibit N	Crimeantatars.club, <i>Meeting with coppersmith master Rustem Dervish (full video) (28 May 2022).</i>
Exhibit O	Crimeantatars.club, <i>Meeting with Crimean Tatar national movement veteran Arsen Alchikov (video) (30 August 2020).</i>

- Exhibit P Canli.online, *CANLI – a new generation of Crimean Tatar media*.
- Exhibit Q Ministry of Culture of the Russian Federation, “The Possessed” Film Distribution Certificate No. 111030522, 8 November 2022.
- Exhibit R Taurica.net, *The Forgotten Leader of the Crimean Tatar People – Dead Opponent of Dzhemilev in the Early 1990s* (9 December 2016).
- Exhibit S Gazeta.ua, *Norik Shirin Killed in Garage* (21 December 2006).
- Exhibit T Milli Firka, *Nothing Is Worse Than Someone Else's Rightness, Nothing Is Better Than One's Mistakes* (12 October 2010).
- Exhibit U Qurultay of the Crimean Tatar People, Regulation “On the Election of Delegates of the Qurultay of the Crimean Tatar People”, 12 January 2013.
- Exhibit V Crimea24.info, *Exceptional Violations Noted during Crimean Tatar Qurultay Elections* (14 May 2013).
- Exhibit W Milli Firka, *Wide-Scale Violations During Qurultay Election* (19 June 2013).
- Exhibit X Milli Firka, *Their Qurultay Election Passed* (30 July 2013).
- Exhibit Y ZN.UA, *Authoritarian democracy* (26 December 1997).
- Exhibit Z Milli Firka, *Who and How Ripped Off the People in the Mejlis* (25 March 2011).
- Exhibit AA Milli Firka, *How Dzhemilev Ripped Off Three Orphans* (12 October 2013).
- Exhibit AB VKontakte, Crimea24.tv, *Mustafa Dzhemilev sold most of the humanitarian aid handed over from Turkey to Crimean Tatars* (3 February 2023).
- Exhibit AC Politnavigator.net, *Erdogan is suggested to initiate an investigation into the theft of Turkish money by the Mejlis leadership* (7 February 2023).
- Exhibit AD RIA Novosti (Crimea), *How Crimea Was Tempered: Five Blockades in the Peninsula's Modern History* (28 February 2019).

- Exhibit AE RBC, *Crimea's Shutdown: The Threat of an Energy Blockade to the Republic* (22 November 2015).
- Exhibit AF Odessa Crisis Media Center, *Lenur Islyamov: We Will Return Crimea Within 2016* (25 December 2015).
- Exhibit AG YouTube, ATR TV, *The Civil Blockade of Crimea: How it All Started 3 Years Ago and What the Outcome Was* (21 September 2018).
- Exhibit AH Federal State Statistics Service, RESULTS OF THE POPULATION CENSUS IN THE CRIMEAN FEDERAL DISTRICT (Russian Institute of Statistics, 2015).
- Exhibit AI State Council of the Republic of Crimea, *Edip Gafarov*.
- Exhibit AJ State Council of the Republic of Crimea, *Chinghiz Yakubov*.
- Exhibit AK Milli Firka, *Mejlis wants Mogilev's resignation* (7 May 2013).
- Exhibit AL RIA Novosti, *The 75th Anniversary of the Deportation of Peoples from Crimea: Remembrance Events at the Syuren Memorial* (18 May 2019).
- Exhibit AM Crimean Tatar Museum of Cultural and Historical Heritage, *Events in Memory of Victims of Deportation of Peoples from Crimea Held at Syuren Station* (18 May 2022).

Exhibit A

Krym 24, #KEYPOINT #CRIMEANTATARISSUE (10 February 2023)

(translation)

Translation

Krym 24, #KEYPOINT #CRIMEANTATARISSUE (10 February 2023), available at: <https://crimea24tv.ru/content/glavnoe-krimskotatarskiyvopros-11/>.

#KEYPOINT
#CRIMEANTATARISSUE

Friday, 10 February. *Krym 24*. The difficult stage of the Crimean Tatars' social and domestic adaptation has been completed in general. But there are still a lot of questions. Who are we? Crimean Tatars? Crimeans? Kyrymlys? How politically mature are we? Is our path now a survival or development one? What's about our demographics? Emigration amidst a strong natural growth?

We discuss these and other topics in our TV show called "The Key Point. Special Project. The Crimean Tatar Issue".

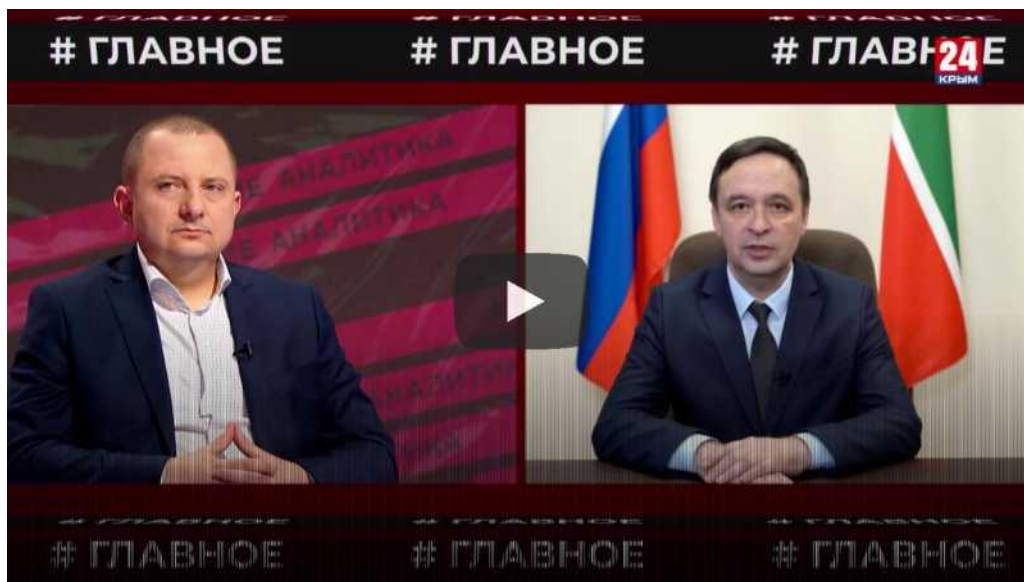


Exhibit B

Mediacentre n.a. I. Gasprinsky, *Archive of the “Yany Dyunya” newspaper*

(translation)

Translation

Mediacentre n.a. I. Gasprinsky, *Archive of the “Yany Dyunya” newspaper*, available at: <https://mediacentr.org.ru/arhiv-gazety-yany-dyunya/>.

Archive of the “Yany Dyunya” newspaper

Archive of the “Yany Dyunya” newspaper in PDF for 2018

- [Yany Dyunya No.1 \(1435\) 2018](#)
- [Yany Dyunya No.2 \(1436\) 2018](#)
- [Yany Dyunya No.3 \(1437\) 2018](#)
- [Yany Dyunya No.4 \(1438\) 2018](#)
- [Yany Dyunya No.5 \(1439\) 2018](#)
- [Yany Dyunya No.6 \(1440\) 2018](#)
- [Yany Dyunya No.7 \(1441\) 2018](#)
- [Yany Dyunya No.8 \(1442\) 2018](#)
- [Yany Dyunya No.9 \(1443\) 2018](#)
- [Yany Dyunya No.10 \(1444\) 2018](#)
- [Yany Dyunya No.11 \(1445\) 2018](#)
- [Yany Dyunya No.12 \(1446\) 2018](#)
- [Yany Dyunya No.13 \(1447\) 2018](#)
- [Yany Dyunya No.14 \(1448\) 2018](#)
- [Yany Dyunya No.15 \(1449\) 2018](#)
- [Yany Dyunya No.16 \(1450\) 2018](#)
- [Yany Dyunya No.17 \(1451\) 2018](#)
- [Yany Dyunya No.18 \(1452\) 2018](#)
- [Yany Dyunya No.19 \(1453\) 2018](#)
- [Yany Dyunya No.20 \(1454\) 2018](#)
- [Yany Dyunya No.21 \(1455\) 2018](#)
- [Yany Dyunya No.22 \(1456\) 2018](#)
- [Yany Dyunya No.23 \(1457\) 2018](#)
- [Yany Dyunya No.24 \(1458\) 2018](#)
- [Yany Dyunya No.25 \(1459\) 2018](#)
- [Yany Dyunya No.26 \(1460\) 2018](#)
- [Yany Dyunya No.27 \(1461\) 2018](#)
- [Yany Dyunya No.28 \(1462\) 2018](#)
- [Yany Dyunya No.29 \(1463\) 2018](#)
- [Yany Dyunya No.30 \(1464\) 2018](#)
- [Yany Dyunya No.31 \(1465\) 2018](#)

Annex 27 Exhibit B

[Yany Dyunya No.32 \(1466\) 2018](#)
[Yany Dyunya No.33 \(1467\) 2018](#)
[Yany Dyunya No.34 \(1468\) 2018](#)
[Yany Dyunya No.35 \(1469\) 2018](#)
[Yany Dyunya No.36 \(1470\) 2018](#)
[Yany Dyunya No.37 \(1471\) 2018](#)
[Yany Dyunya No.38 \(1472\) 2018](#)
[Yany Dyunya No.39 \(1473\) 2018](#)
[Yany Dyunya No.40 \(1474\) 2018](#)
[Yany Dyunya No.41 \(1475\) 2018](#)
[Yany Dyunya No.42 \(1476\) 2018](#)
[Yany Dyunya No.43 \(1477\) 2018](#)
[Yany Dyunya No.44 \(1478\) 2018](#)
[Yany Dyunya No.45 \(1479\) 2018](#)
[Yany Dyunya No.46 \(1480\) 2018](#)
[Yany Dyunya No.47 \(1481\) 2018](#)
[Yany Dyunya No.48 \(1482\) 2018](#)
[Yany Dyunya No.49 \(1483\) 2018](#)
[Yany Dyunya No.50 \(1484\) 2018](#)
[Yany Dyunya No.51201852 \(1485-1486\) 2018](#)

Archive of the “**Yany Dyunya**” newspaper in **PDF** for 2019

[Yany Dyunya No.1 \(1487\) 2019](#)
[Yany Dyunya No.2 \(1488\) 2019](#)
[Yany Dyunya No.3 \(1489\) 2019](#)
[Yany Dyunya No.4 \(1490\) 2019](#)
[Yany Dyunya No.5 \(1491\) 2019](#)
[Yany Dyunya No.6 \(1492\) 2019](#)
[Yany Dyunya No.7 \(1493\) 2019](#)
[Yany Dyunya No.8 \(1494\) 2019](#)
[Yany Dyunya No.9 \(1495\) 2019](#)
[Yany Dyunya No.10 \(1496\) 2019](#)
[Yany Dyunya No.11 \(1497\) 2019](#)
[Yany Dyunya No.12 \(1498\) 2019](#)
[Yany Dyunya No.13 \(1499\) 2019](#)
[Yany Dyunya No.14 \(1500\) 2019](#)
[Yany Dyunya No.15 \(1501\) 2019](#)
[Yany Dyunya No.16 \(1502\) 2019](#)

[Yany Dyunya No.17 \(1503\) 2019](#)
[Yany Dyunya No.18 \(1504\) 2019](#)
[Yany Dyunya No.19 \(1505\) 2019](#)
[Yany Dyunya No.20 \(1506\) 2019](#)
[Yany Dyunya No.21 \(1507\) 2019](#)
[Yany Dyunya No.22 \(1508\) 2019](#)
[Yany Dyunya No.23 \(1509\) 2019](#)
[Yany Dyunya No.24 \(1510\) 2019](#)
[Yany Dyunya No.25 \(1511\) 2019](#)
[Yany Dyunya No.26 \(1512\) 2019](#)
[Yany Dyunya No.27 \(1513\) 2019](#)
[Yany Dyunya No.28 \(1514\) 2019](#)
[Yany Dyunya No.29 \(1515\) 2019](#)
[Yany Dyunya No.30 \(1516\) 2019](#)
[Yany Dyunya No.31 \(1517\) 2019](#)
[Yany Dyunya No.32 \(1518\) 2019](#)
[Yany Dyunya No.33 \(1519\) 2019](#)
[Yany Dyunya No.34 \(1520\) 2019](#)
[Yany Dyunya No.35 \(1521\) 2019](#)
[Yany Dyunya No.36 \(1522\) 2019](#)
[Yany Dyunya No.37 \(1523\) 2019](#)
[Yany Dyunya No.38 \(1524\) 2019](#)
[Yany Dyunya No.39 \(1525\) 2019](#)
[Yany Dyunya No.40 \(1526\) 2019](#)
[Yany Dyunya No.41 \(1527\) 2019](#)
[Yany Dyunya No.42 \(1528\) 2019](#)
[Yany Dyunya No.43 \(1529\) 2019](#)
[Yany Dyunya No.44 \(1530\) 2019](#)
[Yany Dyunya No.45 \(1531\) 2019](#)
[Yany Dyunya No.46 \(1532\) 2019](#)
[Yany Dyunya No.47 \(1533\) 2019](#)
[Yany Dyunya No.48 \(1534\) 2019](#)
[Yany Dyunya No.49 \(1535\) 2019](#)
[Yany Dyunya No.50 \(1536\) 2019](#)
[Yany Dyunya No.51201952 \(1537-1538\) 2019](#)

Archive of the “**Yany Dyunya**” newspaper in **PDF** for 2020

[Yany Dyunya No.1 \(1539\) 2020](#)

Annex 27 Exhibit B

[Yany Dyunya No.2 \(1540\) 2020](#)
[Yany Dyunya No.3 \(1541\) 2020](#)
[Yany Dyunya No.4 \(1542\) 2020](#)
[Yany Dyunya No.5 \(1543\) 2020](#)
[Yany Dyunya No.6 \(1544\) 2020](#)
[Yany Dyunya No.7 \(1545\) 2020](#)
[Yany Dyunya No.8 \(1546\) 2020](#)
[Yany Dyunya No.9 \(1547\) 2020](#)
[Yany Dyunya No.10 \(1548\) 2020](#)
[Yany Dyunya No.11 \(1549\) 2020](#)
[Yany Dyunya No.12 \(1550\) 2020](#)
[Yany Dyunya No.13 \(1551\) 2020](#)
[Yany Dyunya No.14 \(1552\) 2020](#)
[Yany Dyunya No.15 \(1553\) 2020](#)
[Yany Dyunya No.16 \(1554\) 2020](#)
[Yany Dyunya No.17 \(1555\) 2020](#)
[Yany Dyunya No.18 \(1556\) 2020](#)
[Yany Dyunya No.19 \(1557\) 2020](#)
[Yany Dyunya No.20 \(1558\) 2020](#)
[Yany Dyunya No.21 \(1559\) 2020](#)
[Yany Dyunya No.22 \(1560\) 2020](#)
[Yany Dyunya No.23 \(1561\) 2020](#)
[Yany Dyunya No.24 \(1562\) 2020](#)
[Yany Dyunya No.25 \(1563\) 2020](#)
[Yany Dyunya No.26 \(1564\) 2020](#)
[Yany Dyunya No.27 \(1565\) 2020](#)
[Yany Dyunya No.28 \(1566\) 2020](#)
[Yany Dyunya No.29 \(1567\) 2020](#)
[Yany Dyunya No.30 \(1568\) 2020](#)
[Yany Dyunya No.31 \(1569\) 2020](#)
[Yany Dyunya No.32 \(1570\) 2020](#)
[Yany Dyunya No.33 \(1571\) 2020](#)
[Yany Dyunya No.34 \(1572\) 2020](#)
[Yany Dyunya No.35 \(1573\) 2020](#)
[Yany Dyunya No.36 \(1574\) 2020](#)
[Yany Dyunya No.37 \(1575\) 2020](#)
[Yany Dyunya No.38 \(1576\) 2020](#)
[Yany Dyunya No.39 \(1577\) 2020](#)
[Yany Dyunya No.40 \(1578\) 2020](#)

[Yany Dyunya No.41 \(1579\) 2020](#)
[Yany Dyunya No.42 \(1580\) 2020](#)
[Yany Dyunya No.43 \(1581\) 2020](#)
[Yany Dyunya No.44 \(1582\) 2020](#)
[Yany Dyunya No.45 \(1583\) 2020](#)
[Yany Dyunya No.46 \(1584\) 2020](#)
[Yany Dyunya No.47 \(1585\) 2020](#)
[Yany Dyunya No.48 \(1586\) 2020](#)
[Yany Dyunya No.49 \(1587\) 2020](#)
[Yany Dyunya No.50 \(1588\) 2020](#)
[Yany Dyunya No.51-52 \(1589-1590\) 2020](#)

Archive of the “**Yany Dyunya**” newspaper in **PDF** for 2021

[Yany Dyunya No.1 \(1591\) 2021](#)
[Yany Dyunya No.2 \(1592\) 2021](#)
[Yany Dyunya No.3 \(1593\) 2021](#)
[Yany Dyunya No.4 \(1594\) 2021](#)
[Yany Dyunya No.5 \(1595\) 2021](#)
[Yany Dyunya No.6 \(1596\) 2021](#)
[Yany Dyunya No.7 \(1597\) 2021](#)
[Yany Dyunya No.8 \(1598\) 2021](#)
[Yany Dyunya No.9 \(1599\) 2021](#)
[Yany Dyunya No.10 \(1600\) 2021](#)
[Yany Dyunya No.11 \(1601\) 2021](#)
[Yany Dyunya No.12 \(1602\) 2021](#)
[Yany Dyunya No.13 \(1603\) 2021](#)
[Yany Dyunya No.14 \(1604\) 2021](#)
[Yany Dyunya No.15 \(1605\) 2021](#)
[Yany Dyunya No.16 \(1606\) 2021](#)
[Yany Dyunya No.17 \(1607\) 2021](#)
[Yany Dyunya No.18 \(1608\) 2021](#)
[Yany Dyunya No.19 \(1609\) 2021](#)
[Yany Dyunya No.20 \(1610\) 2021](#)
[Yany Dyunya No.21 \(1611\) 2021](#)
[Yany Dyunya No.22 \(1612\) 2021](#)
[Yany Dyunya No.23 \(1613\) 2021](#)
[Yany Dyunya No.24 \(1614\) 2021](#)
[Yany Dyunya No.25 \(1615\) 2021](#)

Annex 27 Exhibit B

[Yany Dyunya No.26 \(1616\) 2021](#)
[Yany Dyunya No.27 \(1617\) 2021](#)
[Yany Dyunya No.28 \(1618\) 2021](#)
[Yany Dyunya No.29 \(1619\) 2021](#)
[Yany Dyunya No.30 \(1620\) 2021](#)
[Yany Dyunya No.31 \(1621\) 2021](#)
[Yany Dyunya No.32 \(1622\) 2021](#)
[Yany Dyunya No.33 \(1623\) 2021](#)
[Yany Dyunya No.34 \(1624\) 2021](#)
[Yany Dyunya No.35 \(1625\) 2021](#)
[Yany Dyunya No.36 \(1626\) 2021](#)
[Yany Dyunya No.37 \(1627\) 2021](#)
[Yany Dyunya No.38 \(1628\) 2021](#)
[Yany Dyunya No.39 \(1629\) 2021](#)
[Yany Dyunya No.40 \(1630\) 2021](#)
[Yany Dyunya No.41 \(1631\) 2021](#)
[Yany Dyunya No.42 \(1632\) 2021](#)
[Yany Dyunya No.43 \(1633\) 2021](#)
[Yany Dyunya No.44 \(1634\) 2021](#)
[Yany Dyunya No.45 \(1635\) 2021](#)
[Yany Dyunya No.46 \(1636\) 2021](#)
[Yany Dyunya No.47 \(1637\) 2021](#)
[Yany Dyunya No.48 \(1638\) 2021](#)
[Yany Dyunya No.49 \(1639\) 2021](#)
[Yany Dyunya No.50 \(1640\) 2021](#)
[Yany Dyunya No.51-52 \(1641-1642\) 2021](#)

Archive of the “**Yany Dyunya**” newspaper in **PDF** for 2022

[Yany Dyunya No.1 \(1643\) 2022](#)
[Yany Dyunya No.2 \(1644\) 2022](#)
[Yany Dyunya No.3 \(1645\) 2022](#)
[Yany Dyunya No.4 \(1646\) 2022](#)
[Yany Dyunya No.5 \(1647\) 2022](#)
[Yany Dyunya No.6 \(1648\) 2022](#)
[Yany Dyunya No.7 \(1649\) 2022](#)
[Yany Dyunya No.8 \(1650\) 2022](#)
[Yany Dyunya No.9 \(1651\) 2022](#)
[Yany Dyunya No.10 \(1652\) 2022](#)

[Yany Dyunya No.11 \(1653\) 2022](#)

[Yany Dyunya No.12 \(1654\) 2022](#)

[Yany Dyunya No.13 \(1655\) 2022](#)

[Yany Dyunya No.14 \(1656\) 2022](#)

[Yany Dyunya No.15 \(1657\) 2022](#)

[Yany Dyunya No.16 \(1658\) 2022](#)

[Yany Dyunya No.17 \(1659\) 2022](#)

[Yany Dyunya No.18 \(1660\) 2022](#)

[Yany Dyunya No.19 \(1661\) 2022](#)

[Yany Dyunya No.20 \(1662\) 2022](#)

[Yany Dyunya No.21 \(1663\) 2022](#)

[Yany Dyunya No.22 \(1664\) 2022](#)

[Yany Dyunya No.23 \(1665\) 2022](#)

[Yany Dyunya No.24 \(1666\) 2022](#)

[Yany Dyunya No.25 \(1667\) 2022](#)

[Yany Dyunya No.26 \(1668\) 2022](#)

[Yany Dyunya No.27 \(1669\) 2022](#)

[Yany Dyunya No.28 \(1670\) 2022](#)

[Yany Dyunya No.29 \(1671\) 2022](#)

[Yany Dyunya No.30 \(1672\) 2022](#)

[Yany Dyunya No.31 \(1673\) 2022](#)

[Yany Dyunya No.32 \(1674\) 2022](#)

[Yany Dyunya No.33 \(1675\) 2022](#)

Yany Dyunya No.34 (1676) 2022

Yany Dyunya No.35 (1657) 2022

Yany Dyunya No.36 (1658) 2022

Yany Dyunya No.37 (1659) 2022

Yany Dyunya No.38 (1660) 2022

Exhibit C

Mediacentre n.a. I. Gasprinsky, *Archive of the "Meraba" newspaper*

(translation)

Translation

Mediacentre n.a. I. Gasprinsky, *Archive of the “Meraba” newspaper*, available at: <https://mediacentr.org.ru/gazeta-meraba/arhiv-gazety-meraba/>.

Archive of the “Meraba” newspaper

Archive of the “**Meraba**” newspaper in **PDF** for 2017

[Meraba No.1 \(58\)](#)

[Meraba No.42 \(99\)](#)

Archive of the “**Meraba**” newspaper in **PDF** for 2018

[Meraba No.1 \(108\)](#)

[Meraba No.2 \(109\)](#)

[Meraba No.3 \(110\)](#)

[Meraba No.4 \(111\)](#)

[Meraba No.5 \(112\)](#)

[Meraba No.6 \(113\)](#)

[Meraba No.7 \(114\)](#)

[Meraba No.8 \(115\)](#)

[Meraba No.9 \(116\)](#)

[Meraba No.10 \(117\)](#)

[Meraba No.11 \(118\)](#)

[Meraba No.12 \(119\)](#)

[Meraba No.13 \(120\)](#)

[Meraba No.14 \(121\)](#)

[Meraba No.15 \(122\)](#)

[Meraba No.16 \(123\)](#)

[Meraba No.17 \(124\)](#)

[Meraba No.18 \(125\)](#)

[Meraba No.19 \(126\)](#)

[Meraba No.20 \(127\)](#)

[Meraba No.21 \(128\)](#)

[Meraba No.22 \(129\)](#)

[Meraba No.23 \(130\)](#)

[Meraba No.24 \(131\)](#)

[Meraba No.25 \(132\)](#)

[Meraba No.26 \(133\)](#)

Annex 27 Exhibit C

[Meraba No.27 \(134\)](#)
[Meraba No.28 \(135\)](#)
[Meraba No.29 \(136\)](#)
[Meraba No.30 \(137\)](#)
[Meraba No.31 \(138\)](#)
[Meraba No.32 \(139\)](#)
[Meraba No.33 \(140\)](#)
[Meraba No.34 \(141\)](#)
[Meraba No.35 \(142\)](#)
[Meraba No.36 \(143\)](#)
[Meraba No.37 \(144\)](#)
[Meraba No.38 \(145\)](#)
[Meraba No.39 \(146\)](#)
[Meraba No.40 \(147\)](#)
[Meraba No.41 \(148\)](#)
[Meraba No.42 \(149\)](#)
[Meraba No.43 \(150\)](#)
[Meraba No.44 \(151\)](#)
[Meraba No.45 \(152\)](#)
[Meraba No.46 \(153\)](#)
[Meraba No.47 \(154\)](#)
[Meraba No.48 \(155\)](#)
[Meraba No.49 \(156\)](#)
[Meraba No.50 \(157\)](#)
[Meraba No.51,52 \(158\)](#)

Archive of the “**Meraba**” newspaper in **PDF** for 2019

[Meraba, No.1 2019](#)
[Meraba, No.2 2019](#)
[Meraba, No.3 2019](#)
[Meraba, No.4 2019](#)
[Meraba, No.5 2019](#)
[Meraba, No.6 2019](#)
[Meraba, No.7 2019](#)
[Meraba, No.8 2019](#)
[Meraba, No.9 2019](#)
[Meraba, No.10 2019](#)
[Meraba, No.11 2019](#)

[Meraba, No.12 2019](#)

[Meraba, No.13 2019](#)

[Meraba, No.14 2019](#)

[Meraba, No.15 2019](#)

[Meraba, No.16 2019](#)

[Meraba, No.17 2017](#)

[Meraba, No. 18 2019](#)

[Meraba, No.19 2019](#)

[Meraba, No.20 2019](#)

[Meraba, No.21 2019](#)

[Meraba, No.22 2019](#)

[Meraba, No.23 2019](#)

[Meraba, No.24 2019](#)

[Meraba, No.25 2019](#)

[Meraba, No.26 2019](#)

[Meraba, No.27 2019](#)

[Meraba, No.28 2019](#)

[Meraba, No.29 2019](#)

[Meraba, No.30 2019](#)

[Meraba, No.31 2019](#)

[Meraba, No.32 2019](#)

[Meraba, No.33 2019](#)

[Meraba, No.34 2019](#)

[Meraba, No.35 2019](#)

[Meraba, No.36 2019](#)

[Meraba, No.37 2019](#)

[Meraba, No.38 2019](#)

[Meraba, No.39 2019](#)

[Meraba, No.40 2019](#)

[Meraba, No.41 2019](#)

[Meraba, No.42 2019](#)

[Meraba, No.43 2019](#)

[Meraba, No.44 2019](#)

[Meraba, No.45 2019](#)

[Meraba, No.46 2019](#)

[Meraba, No.47 2019](#)

[Meraba, No.48 2019](#)

[Meraba, No.49 2019](#)

[Meraba, No.50 2019](#)

[Meraba, No.51-52 2019](#)

Archive of the “**Meraba**” newspaper in **PDF** for 2020

[Meraba No.1 \(211\) 2020](#)

[Meraba No.2 \(212\) 2020](#)

[Meraba No.3 \(213\) 2020](#)

[Meraba No.4 \(214\) 2020](#)

[Meraba No.5 \(215\) 2020](#)

[Meraba No.6 \(216\) 2020](#)

[Meraba No.7 \(217\) 2020](#)

[Meraba No.8 \(218\) 2020](#)

[Meraba No.9 \(219\) 2020](#)

[Meraba No.10 \(220\) 2020](#)

[Meraba No.11 \(221\) 2020](#)

[Meraba No.12 \(222\) 2020](#)

[Meraba No.13 \(223\) 2020](#)

[Meraba No.14 \(224\) 2020](#)

[Meraba No.15 \(225\) 2020](#)

[Meraba No.16 \(226\) 2020](#)

[Meraba No.17 \(227\) 2020](#)

[Meraba No.18 \(228\) 2020](#)

[Meraba No.19 \(229\) 2020](#)

[Meraba No.20 \(230\) 2020](#)

[Meraba No.21 \(231\) 2020](#)

[Meraba No.22 \(232\) 2020](#)

[Meraba No.23 \(233\) 2020](#)

[Meraba No.24 \(234\) 2020](#)

[Meraba No.25 \(235\) 2020](#)

[Meraba No.26 \(236\) 2020](#)

[Meraba No.27 \(237\) 2020](#)

[Meraba No.28 \(238\) 2020](#)

[Meraba No.29 \(239\) 2020](#)

[Meraba No.30 \(240\) 2020](#)

[Meraba No.31 \(241\) 2020](#)

[Meraba No.32 \(242\) 2020](#)

[Meraba No.33 \(243\) 2020](#)

[Meraba No.34 \(244\) 2020](#)

[Meraba No.35 \(245\) 2020](#)

[Meraba No.36 \(246\) 2020](#)

[Meraba No.37 \(247\) 2020](#)

[Meraba No.38 \(248\) 2020](#)

[Meraba No.39 \(249\) 2020](#)

[Meraba No.40 \(250\) 2020](#)

[Meraba No.41 \(251\) 2020](#)

[Meraba No.42 \(252\) 2020](#)

[Meraba No.43 \(253\) 2020](#)

[Meraba No.44 \(254\) 2020](#)

[Meraba No.45 \(255\) 2020](#)

[Meraba No.46 \(256\) 2020](#)

[Meraba No.47 \(257\) 2020](#)

[Meraba No.48 \(258\) 2020](#)

[Meraba No.49 \(259\) 2020](#)

[Meraba No.50 \(260\) 2020](#)

[Meraba No.51-52 \(261-262\) 2020](#)

Archive of the “**Meraba**” newspaper in **PDF** for 2021

[Meraba No.1 \(263\) 2021](#)

[Meraba No.2 \(264\) 2021](#)

[Meraba No.3 \(265\) 2021](#)

[Meraba No.4 \(266\) 2021](#)

[Meraba No.5 \(267\) 2021](#)

[Meraba No.6 \(268\) 2021](#)

[Meraba No.7 \(269\) 2021](#)

[Meraba No.8 \(270\) 2021](#)

[Meraba No.9 \(271\) 2021](#)

[Meraba No.10 \(272\) 2021](#)

[Meraba No.11 \(273\) 2021](#)

[Meraba No.12 \(274\) 2021](#)

[Meraba No.13 \(275\) 2021](#)

[Meraba No.14 \(276\) 2021](#)

[Meraba No.15 \(277\) 2021](#)

[Meraba No.16 \(278\) 2021](#)

[Meraba No.17 \(279\) 2021](#)

[Meraba No.18 \(280\) 2021](#)

[Meraba No.19 \(281\) 2021](#)

[Meraba No.20 \(282\) 2021](#)

Annex 27 Exhibit C

[Meraba No.21 \(283\) 2021](#)

[Meraba No.22 \(284\) 2021](#)

[Meraba No.23 \(285\) 2021](#)

[Meraba No.24 \(286\) 2021](#)

[Meraba No.25 \(287\) 2021](#)

[Meraba No.26 \(288\) 2021](#)

[Meraba No.27 \(289\) 2021](#)

[Meraba No.28 \(290\) 2021](#)

[Meraba No.29 \(291\) 2021](#)

[Meraba No.30 \(292\) 2021](#)

[Meraba No.31 \(293\) 2021](#)

[Meraba No.32 \(294\) 2021](#)

[Meraba No.33 \(295\) 2021](#)

[Meraba No.34 \(296\) 2021](#)

[Meraba No.35 \(297\) 2021](#)

[Meraba No.36 \(298\) 2021](#)

[Meraba No.37 \(299\) 2021](#)

[Meraba No.38 \(300\) 2021](#)

[Meraba No.39 \(301\) 2021](#)

[Meraba No.40 \(302\) 2021](#)

[Meraba No.41 \(303\) 2021](#)

[Meraba No.42 \(304\) 2021](#)

[Meraba No.43 \(305\) 2021](#)

[Meraba No.44 \(306\) 2021](#)

[Meraba No.45 \(307\) 2021](#)

[Meraba No.46 \(308\) 2021](#)

[Meraba No.47 \(309\) 2021](#)

[Meraba No.48 \(310\) 2021](#)

[Meraba No.49 \(311\) 2021](#)

[Meraba No.50 \(312\) 2021](#)

[Meraba No.51-52 \(313-314\) 2021](#)

Archive of the “**Meraba**” newspaper in **PDF** for 2022

[Meraba No.1 \(315\) 2022](#)

[Meraba No.2 \(316\) 2022](#)

[Meraba No.3 \(317\) 2022](#)

[Meraba No.4 \(318\) 2022](#)

[Meraba No.5 \(319\) 2022](#)

[Meraba No.6 \(320\) 2022](#)
[Meraba No.7 \(321\) 2022](#)
[Meraba No.8 \(322\) 2022](#)
[Meraba No.9 \(323\) 2022](#)
[Meraba No.10 \(324\) 2022](#)
[Meraba No.11 \(325\) 2022](#)
[Meraba No.12 \(326\) 2022](#)
[Meraba No.13 \(327\) 2022](#)
[Meraba No.14 \(328\) 2022](#)
[Meraba No.15 \(329\) 2022](#)
[Meraba No.16 \(330\) 2022](#)
[Meraba No.17 \(331\) 2022](#)
[Meraba No.18 \(332\) 2022](#)
[Meraba No.19 \(333\) 2022](#)
[Meraba No.20 \(334\) 2022](#)
[Meraba No.21 \(335\) 2022](#)
[Meraba No.22 \(336\) 2022](#)
[Meraba No.23 \(337\) 2022](#)
[Meraba No.24 \(338\) 2022](#)
[No.25 \(339\) MERABA pdfA.pdf](#)
[No.26 \(340\) MERABA pdfA.pdf](#)
[No.27 \(341\) MERABA pdfA.pdf](#)
[No.28 \(342\) MERABA pdfA.pdf](#)
[No.29 \(343\) MERABA pdfA.pdf](#)
[No.30 \(344\) MERABA pdfA.pdf](#)
[No.31 \(345\) MERABA pdfA.pdf](#)
[No.32 \(346\) MERABA pdfA.pdf](#)
[No.33 \(347\) MERABA pdfA.pdf](#)
[No.34 \(348\) MERABA pdfA.pdf](#)
[No.35 \(349\) MERABA pdfA.pdf](#)
[No.36 \(350\) MERABA pdfA.pdf](#)
[No.37 \(351\) MERABA pdfA.pdf](#)
[No.38 \(352\) MERABA pdfA.pdf](#)
[No.39 \(353\) MERABA pdfA.pdf](#)
[No.40 \(354\) MERABA pdfA.pdf](#)
[No.41 \(355\) MERABA pdfA.pdf](#)
[No.42 \(356\) MERABA pdfA.pdf](#)
[No.43 \(357\) MERABA pdfA.pdf](#)
[No.44 \(358\) MERABA pdfA.pdf](#)

Annex 27 Exhibit C

No.45_(359)_MERABA_pdfA.pdf

[No.46_\(360\)_MERABA_pdfA.pdf](#)

[No.47_\(361\)_MERABA_pdfA.pdf](#)

[No.48_\(362\)_MERABA_pdfA.pdf](#)

[No.49_\(363\)_MERABA_pdfA.pdf](#)

[No.50_\(364\)_MERABA_pdfA.pdf](#)

[No.51-52_\(365-366\)_MERABA_pdfA.pdf](#)

Exhibit D

Mediacentre n.a. I. Gasprinsky, *“Yildiz” Magazine*

(translation)

Translation

**Mediacentre n.a. I. Gasprinsky, “Yildiz” Magazine, available at:
<https://mediacentr.org.ru/zhurnal-jyldyz/>.**

Yildiz Magazine - Mediacentre n.a. I. Gasprinsky



Editor-in-Chief: Dlyaver Ibrahimovich Osmanov

Legal address: 23a Trubachenko str., Simferopol

Actual address: 23a Trubachenko str., Simferopol

Tel. 598-711; Mobile: +7 (978) 024-46-24

Email address: dosmanov@mail.ru

“Yildiz” Magazine is the world's only socio-political, literary and artistic magazine in the Crimean Tatar language. “Yildiz” started to be published during the deportation years in Tashkent. A group of Crimean Tatar writers came up with the initiative to create a literary magazine in the Crimean Tatar language. After months of pounding the doorsteps of various authorities, permission was granted.

The first issue of “Yildiz” Literary Almanac was published in November, 1976 (it was published as a biannual almanac till the end of 1979, and as a bimonthly magazine (once in 2 months) from 1980).

The publication played an important role in the preservation and development of the Crimean Tatar literary language during the deportation. It has published news of Crimean Tatar culture, works of fiction - stories, novels, plays, verse and poems by Crimean Tatar writers and authors of the pre-war to contemporary period (Yusuf Bolat, Eshref Shemyi-zade, Ziyadin Javtobeli, Raim Tyncherov, Abduraim Altanly, Gafar Bulganakly, Mambet Ablyalimov, Shakir Selim, Emil Amitov, Ervin Umerov, Bilal Mambet, Eskender Fazil, Isa Abduraman, Sheryan Ali and many others), publicism, materials on Crimean Tatar literature and history, literature criticism, music, and more.



In December 1991, the editorial staff of “Yıldız” returned home to Crimea. In January 1992, the first issue of “Yıldız” was published in Akmesjit (Simferopol). With the return to the homeland, the content of the magazine changed dramatically and was enriched with new materials on the history and literature of the Crimean Tatar people.

Over the more than 40 years of the Magazine’s existence, many writers and journalists have worked in various positions at the editorial office: Shamil Alyadin, Uriye Edemova, Riza Fazil, Cherkez-Ali, Safter Nagaev, Ibraim Pashi, Shevket Ramazanov, Aider Osmanov, Ablyaziz Veliyev, Zakir Kurtnezir, Lenyar Dermendzhi, Yusuf Aliyev, Sabriye Seutova, Dilyara Seitjelilova, Najie Ametova, Adkhat Sinogul and others.

Poet Cherkez-Ali was editor-in-chief from 1976 to 1979, writer Shamil Alyadin from 1980 to 1985, writer Ajder Osman from 1985 to 1998, poet Shakir Selim from 1998 to 2008, and poet Dilyaver Osman since 2009 till present.

“Yıldız” Magazine is a jewel of Crimean Tatar culture, which we should all preserve and do everything necessary for its development.

Exhibit E

Archive of “Yildiz” magazine

(translation)

Translation

Archive of the “Yildiz” magazine, available at: <https://disk.yandex.ru/d/cTMRLZBXNsPkow?w=1>.

The screenshot displays the Yandex.Disk interface for a folder named "Yildiz". At the top, there is a search bar and navigation links for "Email", "Disk", and "More". A "Log in" button is visible in the top right corner. Below the search bar, there are links for "Download Browser", "yandex.ru Fast loading sites and videos", and "Advertise". The folder name "Yildiz" is prominently displayed, along with options to "Save to Yandex.Drive", "Download", and a menu icon. The main content area shows a list of 16 PDF files, each with a thumbnail, name, date, time, and size.

File Name	Date	Time	Size
YILDIZ_1_2019.pdf	24.02.2021	17:47	4,2 МБ
YILDIZ_2_2019.pdf	24.02.2021	17:47	3,9 МБ
YILDIZ_3_2019.pdf	24.02.2021	17:47	10,8 МБ
YILDIZ_4_2019.pdf	24.02.2021	17:47	10 МБ
YILDIZ_5_2019.pdf	24.02.2021	17:47	19 МБ
YILDIZ_6_2019.pdf	24.02.2021	17:47	10,6 МБ
Yildiz_6_2021.pdf	13.04.2022	11:37	27,5 МБ
yildiz_01_2021_A.pdf	28.12.2021	12:50	10,8 МБ
yildiz_02_2021_A.pdf	28.12.2021	12:50	11,1 МБ
yildiz_03_2021_A.pdf	28.12.2021	12:50	5,7 МБ
yildiz_04_2021_A.pdf	28.12.2021	12:50	6,8 МБ
yildiz_05_2021_A.pdf	28.12.2021	12:50	10,3 МБ
yildiz_1(253)_2020.pdf	01.02.2021	17:08	16,8 МБ
yildiz_2(254)_2020_.pdf	01.02.2021	17:08	27 МБ
yildiz_2017_5.pdf	17.02.2021	14:49	33,3 МБ
yildiz_2017_6.pdf	17.02.2021	14:49	5,2 МБ

Annex 27 Exhibit E

	yildiz_2018_1.pdf	17.02.2021	14:49	5,8 МБ
	yildiz_2018_2.pdf	17.02.2021	14:49	4,1 МБ
	yildiz_2018_3.pdf	17.02.2021	14:49	4,9 МБ
	yildiz_2018_4.pdf	17.02.2021	14:49	3,7 МБ
	yildiz_2018_5.pdf	17.02.2021	14:49	4,6 МБ
	yildiz_2018_6.pdf	17.02.2021	14:49	3,8 МБ
	yildiz_3(255)_2020.pdf	01.02.2021	17:08	17,6 МБ
	yildiz_4(256)_2020.pdf	01.02.2021	17:08	13,8 МБ
	yildiz_5(257)_2020.pdf	01.02.2021	17:08	31,1 МБ
	yildiz_6(258)_2020.pdf	01.02.2021	17:09	19,7 МБ


©:2012:2023:Yandex  RU

Exhibit F

Mediacentre n.a. I. Gasprinsky, *For teachers of the native language: a scientific-methodological guide for teachers of the Crimean Tatar language and literature. No. 1 (15)* (16 July 2018)

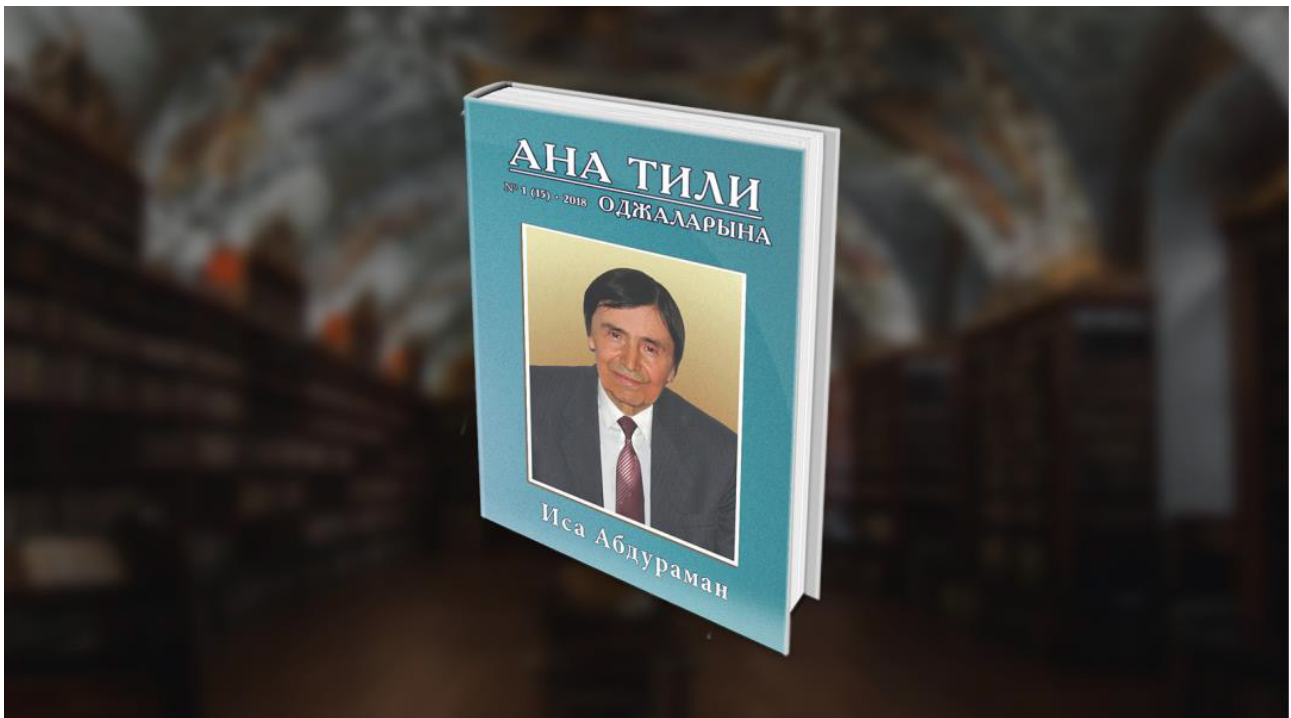
(translation)

Translation

Mediacentre n.a. I. Gasprinsky, *For teachers of the native language: a scientific-methodological guide for teachers of the Crimean Tatar language and literature. No. 1 (15)* (16 July 2018), available at: <https://mediacentr.org.ru/2018/07/16/ana-tili-odzhalaryna-kyrymtatar-tili-ve-edebiyaty-odzhalary-ichyun-ilmij-usulij-medzhmua-1-15/>.

EDITIONS

For teachers of the native language: a scientific-methodological guide for teachers of the Crimean Tatar language and literature. No. 1 (15)



For the Teachers of Native Language: Scientific and Methodological Journal for Teachers of the Crimean Tatar Language and Literature. No. 1 (15). - Simferopol: Mediacentre n.a. I. Gasprinsky, 2018. - 56 с.

Exhibit G

Mediacentre n.a. I. Gasprinsky, *Arzy*

(translation)

Translation

Mediacentre n.a. I. Gasprinsky, *Arzy*, available at: <https://mediacentr.org.ru/arzy/>.

ARZY



Khalilova Lentara Kemalovna

E-mail: dialognews@mail.ru

tel: +7978 802 46 55

The Crimean Tatar magazine "Arzy" is a colorful, richly illustrated publication, which publishes materials aimed at the preservation and development of the native language, culture, traditions, customs and rituals of the Crimean Tatars. On its pages you can read interesting historical materials telling about the activities of prominent Crimean Tatar women, literary works, get acquainted with the bright contemporaries, who contributed to the development of Crimea, with the masters of arts and crafts, whose activities are aimed at developing national traditions in folk and crafts, handed down from generation to generation. The magazine is focused on moral, ethical and cultural values that never lose their relevance at any time.

Subscription index 78301

Cost of subscription for six months: 180, 36 roubles

Exhibit H

Golos Kryma, *Homepage* (17 February 2023)

(translation)

Translation

Golos Kryma, *Homepage* (17 February 2023), available at: <http://goloskrimanew.ru/>.

Topic of the week

THE CHALLENGES OF TIME DON'T ASK US, THEY JUST FALL



17.02.2023 / Society / Djihangir

We turned to the subject of earthquakes following the recent disaster in neighbouring Turkey. Terrible destruction, tens of thousands dead, endless grief for people in trouble.... *... Read more*

Video

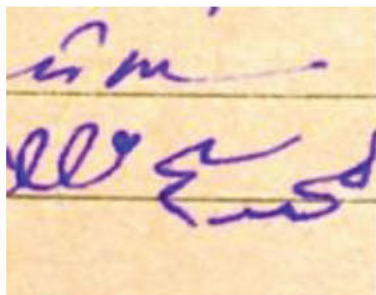


**AN EVENING IN
MEMORY OF IDRIS
ASANIN**

Gulnara Useinova / History
and area studies
16:25

Evening in memory of the
famous writer, publicist,
veteran of the Crimean Tatar
national...

Read more



**THE CASE OF MULLAH
SHEIKH**

Emir Ablyazov / History and area
studies
15:46

...Read more



WINEGROWER

Own info. / Society
15:42
...Read more

Exhibit I

Roskomnadzor, Certificate No. FS 77-60738, 11 February 2015

(translation)

Translation

Roskomnadzor, Certificate No. FS 77-60738, 11 February 2015, available at: <https://rkn.gov.ru/mass-communications/reestr/media/?id=538108&page=>.



MINISTRY OF DIGITAL DEVELOPMENT, COMMUNICATIONS AND MASS MEDIA OF
THE RUSSIAN FEDERATION

**FEDERAL SERVICE FOR SUPERVISION OF COMMUNICATIONS, INFORMATION
TECHNOLOGY AND MASS MEDIA (*ROSKOMNADZOR*)**

Golos Kryma new

Certificate number	PI No. FS 77-60738
Registration date	11 February 2015
Certificate status	Valid
Media outlet name	Golos Kryma new
Form of distribution	printed media/newspaper
Area of distribution	Republic of Crimea Sevastopol
Founder(s)	E.T. Seitbekirova
Address of the editorial office	11 Chichibabina Street, Pionerskoye, Simferopol District, Republic of Crimea, 297577
Languages	Russian, Crimean Tatar, Ukrainian

This article is available at: <https://rkn.gov.ru/mass-communications/reestr/media/?id=538108>

Exhibit J

RIA Novosti, *Aksyonov: Incitement to Hatred in Crimea is unacceptable at this difficult time*
(19 March 2015)

(translation)

Translation

RIA Novosti, *Aksyonov: Incitement to Hatred in Crimea is unacceptable at this difficult time* (19 March 2015), available at: <https://ria.ru/20150319/1053392148.html>.

Everyone who incites conflicts, whether in media or elsewhere, will not be able to work in the Republic, Crimean leader Sergey Aksyonov said. In particular, he drew attention to the activities of the Crimean Tatar TV channel ATR.

Moscow, 19 March, *RIA Novosti*. Inciting hatred between different peoples in Crimea during these difficult times is unacceptable, so all those who do so in one way or another, in particular, mass media, will not be able to work in the Republic, Sergey Aksyonov, Head of the Republic of Crimea, told reporters on Thursday on the sidelines of a round table discussion held in Moscow on the occasion of the ninth anniversary of the reunification of Crimea and Russia.

According to him, it is unacceptable when people “are pitted against each other on a national basis in an attempt to drive a wedge between us, Russians and Crimean Tatars, who have lived here for centuries”.

“That will never happen, one way or another. Therefore, all those who will incite conflicts, be it mass media or anyone else, will not be able to work in the Republic”, Mr. Aksyonov said.

In particular, the Crimean leader drew attention to the activities of the Crimean Tatar TV channel ATR.

“We have made it clear to the TV channel’s management that it is unacceptable to escalate the situation and cause a sense of tension among the population by giving some people hope that Crimea will return to Ukraine while inciting other people to act and speaking of how they will then deal with those who have received Russian passports – those TV channels should not be allowed to work in the Republic during the current paramilitary period”, Mr. Aksyonov said.

Exhibit K

Crimeantatars.club, Homepage (17 February 2023)

(translation)

Crimeantatars.club, *Homepage* (17 February 2023), available at: <https://www.crimeantatars.club/>



LIVE



COMING BACK

Miracle saved Sadredin Ziyadinov from the Germans



PORTRAIT

Nasim Nafeev: Saved People with War Service Dogs



THE MAP OF CRIMEA

Perekop Shaft protected Crimea from the north





EDUCATION, HERITAGE

BATIR YARASIZ OLMAZ Crimean Tatar proverbs

1 2 3 4 5 10 20 30



MOST POPULAR FOR A DAY



5 ancient places in Crimea



crimeantatars@qaradeniz.com

+7 (978) 208-56-55

Take part in Khalide Fashion

Take part in Canli Ses

Take part in Crimean Tatar book fair

© 2019. CRIMEANTATARS.CLUB

Exhibit L

Crimeantatars.club, *IV Crimean Tatar Book Fair is the Brightest Event of Autumn 2022*
(13 September 2022)

(translation)

Translation

Crimeantatars.club, *IV Crimean Tatar Book Fair is the Brightest Event of Autumn 2022 (13 September 2022)*, available at: <https://www.crimeantatars.club/culture/literature/iv-krymskotatarskaya-knizhnaya-yarmarka-samoe-yarkoe-sobytie-oseni-2022>.

The IV Crimean Tatar Book Fair, one of the most anticipated events of this autumn, took place in Crimea last weekend. This year, the Fair presented 20 new books written by Crimean Tatar authors, including children's, educational, research and fiction literature as well as interesting media projects. A creative meeting dedicated to the memory of Shakir Selim, a Crimean Tatar classical writer, became a special attraction of the Fair. More than 5,000 people visited the Fair in one day this year, each of them taking away books and vivid impressions from the festive event. See our story to discover how it was going on.

Exhibit M

Crimeantatars.club, *Full video of meeting with journalist and writer Zera Bekirova*
(20 November 2020)

(translation)

Translation

Crimeantatars.club, *Full video of meeting with journalist and writer Zera Bekirova (20 November 2020)*, available at: <https://www.crimeantatars.club/life/society/polnaya-videoversiya-vstrechi-s-zhurnalistom-i-pisatelem-zeroj-bekirovoj>.

By the Editorial Board

Watch the full video of a meeting with Zera Bekirova, a chronicler of the history of the Crimean Tatar national movement, an eminent writer, and a journalist. During the meeting, Ms. Bekirova shared her research, spoke about creativity and answered questions asked by young people.

Exhibit N

Crimeantatars.club, *Meeting with coppersmith master Rustem Dervish (full video)*
(28 May 2022)

(translation)

Translation

Crimeantatars.club, *Meeting with coppersmith master Rustem Dervish (full video) (28 May 2022)*, available at: <https://www.crimeantatars.club/life/people/vstrecha-s-rustemom-dervishem-polnaya-versiya>.

By the Editorial Board

A meeting with Rustem Dervish, the creator of the famous Dervish Evi Ethnographic House Museum in Bakhchysarai, a master coppersmith, a collector, and a researcher, took place on the 28th of May in the Sarabuz Ethnic Complex. By the way, he celebrates his 59th birthday today. Watch the full version of the meeting by clicking the link below.

Exhibit O

Crimeantatars.club, *Meeting with Crimean Tatar national movement veteran Arsen Alchikov*
(*video*) (30 August 2020)

(translation)

Translation

Crimeantatars.club, *Meeting with Crimean Tatar national movement veteran Arsen Alchikov (video)* (30 August 2020), available at: <https://www.crimeantatars.club/life/society/vstrechas-veteranom-natsionalnogo-dvizheniya-arsenom-alchikovym-videoversiya>.

By the Editorial Board

We continue sharing videos of various meetings of veterans of the Crimean Tatar national movement with young people as arranged for by Qaradeniz Production Studio. One such meeting took place with Arsen Alchikov. Crimean Tatars call such people “those who have opened the way to the Motherland”.

Exhibit P

Canli.online, *CANLI* – a new generation of Crimean Tatar media

(translation)

Translation

Canli.online, *CANLI* – a new generation of Crimean Tatar media, available at: <https://canli.online/about/>.



CANLI is a new-generation Crimean Tatar media outlet.

We are all a team of friends and professionals who listen to good music, read native literature, are interested in history and ponder the future.

100
videos

40000
social media followers

800000
views of our product

3
years of live streaming

**Our ultimate task is to preserve
Crimean Tatar cultural heritage and
develop it in modern formats.**

In four years, we have created a Crimean Tatar
radio station in a 24/7 format from scratch,
launched the Ders media lecture series,
recorded the best Crimean Tatar audio books,
and launched a video blog about our contemporaries.

**Working to create and
promote Crimean Tatar
cinematography**

[More about cinematography here](#)

Exhibit Q

Ministry of Culture of the Russian Federation, “The Possessed” Film Distribution Certificate No.
111030522, 8 November 2022

(translation)

Translation

Ministry of Culture of the Russian Federation, “The Possessed” Film Distribution Certificate No. 111030522, 8 November 2022, available at: <https://culture.gov.ru/services/reestr-prokatnykh-udostovereniy/5750863/#>.

“The Possessed”

Drama

Year	2022
Country of production	Russia
Director	E. Ablayev
Scriptwriter	E. Ablayev
Producer	IE Ablayeva Nadzhiye Femiyeвна
Composers	U. Bekirov, A. Osmanov, and B. Abdullayev
Art director	S. Gavrilentov
Production studio	IE Ablayeva Nadzhiye Femiyeвна (trademark: CANLI Production)
Colour	Coloured
Publicity rights	Screening in cinema halls, distribution on tangible media, and screening by other technical means
Age category	16+
Duration, minutes	27
Distribution certificate number	111030522
Distribution certificate issue date	8 November 2022

Exhibit R

Taurica.net, *The Forgotten Leader of the Crimean Tatar People – Dead Opponent of Dzhemilev
in the Early 1990s* (9 December 2016)

(translation)

Translation

Taurica.net, *The Forgotten Leader of the Crimean Tatar People – Dead Opponent of Dzhemilev in the Early 1990s* (9 December 2016), available at: <https://taurica.net/238739-Zabytyiy-lider-krymsko-tatarskogo-naroda-pogibshiy-protiv-nik-Dzhemileva-v-nachale-90-h.html>.

The Forgotten Leader of the Crimean Tatar People – Dead Opponent of Dzhemilev in the Early 1990s

By Informer



Today, the phrase “the leader of the Crimean Tatar people” brings to mind only Mustafa Dzhemilev, whose personality has been effectively made into a cult by human rights activists and the ideology of post-Maidan Ukraine. A man with harsh nationalist views, an ardent opponent of the Armenian genocide recognition, a destroyer of his compatriot opponents, calling for an ethnic conflict in Crimea and devoting his last decades to the struggle for power in the Verkhovnaya Rada, this, in fact, is all him, the self-proclaimed “leader” of an entire nation, says *Novoross.info*.

Dzhemilev, his supporters and sponsors did everything they could to make sure that his killed and ostracised Crimean Tatar movement opponents were eventually forgotten.

Sooner or later, justice will prevail anyway, and the “the leader of the Crimean Tatar people” will be firmly associated with Yuri Bekirovich Osmanov, a prominent representative of the Soviet intelligentsia, a scientist, writer and publicist who devoted his life to a peaceful return and the restoration of the honest name of the Crimean Tatar people.

The dissident's life path was chosen under the strong influence of his father, Bekir Osmanovich, who was rejected from the army during WWII because of his cardiac defect, but with the arrival of German troops joined the partisans and did reconnaissance for the Sevastopol, Akmechet detachments and the Central Headquarters of the Crimean partisan movement. It was he who instilled in Yuri a love for the history and culture of the Crimean Tatar people.

In 1958, Yuri graduated from school with a gold medal and went up to the Moscow State University but was not accepted because of his nationality. With the assistance of the Crimean Tatar national hero, pilot Sultan Amet-Khan, he managed to enter the Bauman Moscow Higher Technical School, from which he graduated in 1965 with a degree in mechanical engineering. He worked at the Joint Institute for Nuclear Research in Dubna and the Institute for High Energy Physics (Serpukhov).

While at the institute, Yuri Osmanov became an active participant of the Crimean Tatar movement and began to study the legacy of the Crimean Tatar educator Ismail Gasprinsky, devoting his whole life to studying his works. As a student, he began to write poetry and later also did literary translations of poems by Crimean Tatar poets, published in outlaw underground press known as "*Samizdat*".

As a dissident, he was arrested many times. In 1973 and 1974, Yuri and his father organised and conducted a self-census of the Crimean Tatar people, from which he derived the total number of Crimean Tatars deported from Crimea. He drew up seven formal notes concerning damage caused to Crimean Tatars by deportation and drafted a statement of claim on behalf of the Crimean Tatar people which he sent to the UN and the USSR supreme authorities. Yuri was also an active public figure whose initiative helped prevent the impending massacre of the Crimean Tatars during the riots in Fergana in 1989.

Yet, the Crimean Tatar national movement was never cohesive. The movement was represented by various "initiative groups", who created the so-called Central Initiative Group in the spring of 1987. The key role in the creation of the Group was played by Mustafa Dzhemilev. This group later became the core of the Crimean Tatar National Movement Organisation, aka OKND, which in 1989 took shape as a political party. Some groups, for example, the so-called Fergana Valley Group of Yuri Osmanov, did not join the Central Initiative Group, laying the groundwork for the national movement of Crimean Tatars, aka NDKT. This was when the confrontation between Osmanov and Dzhemilev broke out.

The more conservative NDKT and the OKND were separated by fundamental disagreements. The NDKT strove after the restoration of the Crimean ASSR under Lenin's decree of 1921 and counted on the assistance of the USSR's party and state leadership, while the OKND strongly opposed the Soviet system and counted on the creation of national statehood.

Dzhemilev immediately adopted nationalistic ideology and moved into extremism, getting ready for seizure of land in Crimea and confronting the authorities and law enforcement. Having enlisted the support of local authorities, the OKND summoned a "national congress" (Qurultay) of the Crimean Tatars in 1991. The Congress decisions caused a serious aggravation in Crimean interethnic tensions as it announced the creation of the Crimean Tatar national state in Crimea, being the ultimate goal, declared all subsurface resources and waters the property of only Crimean Tatar people and considered all other residents of Crimea, in fact, as illegal outsiders and second-class citizens.

Qurultay established a special body to govern the movement, the Crimean Tatar People's Mejlis, effectively a shadow nationalist government of Crimea, acting accordingly.

In contrast, the NDKT tried to find a way to avoid any new tragedies and bloody conflicts when returning the Crimean Tatars to their historical homeland. Yuri Osmanov accused radical opponents of striving for momentary political success, which could make Crimean Tatars uninvited guests on their own land. He was convinced that his opponents from the OKND were driven by the lust for power and profit rather than by concern for the future of their people.

Soon, though, Yuriy Bekirovich and the NDKT were sidelined for opposing the misuse of financial resources allocated from the USSR budget by the Crimean authorities. So, the organised resettlement of the Crimean Tatars was in fact disrupted, a spontaneous return, unauthorized seizure of land and conflict between the Crimean Tatars and the authorities began.

After his dismissal, Yuri Osmanov devoted himself to the prevention and averting of any potential ethnic and social conflict situations related to the mass return of Crimean Tatars to Crimea. It soon turned out that while Osmanov and his organisation were making every possible effort to rule out ethnic conflict in Crimea, the Mejlis leader was telling the media about "the inevitability of armed clashes between the Crimean Tatars and the Russian population in Crimea," referring to the readiness of the Crimean Tatars to take up arms and essentially calling on the Turkish authorities to intervene. Osmanov went to the editorial offices of those newspapers that had published an interview with Dzhemilev and protested against such publications...

Shortly thereafter, on the 6th of November 1993, Yury Osmanov was severely beaten on his way home from work and died of his injuries the next day. The death of such a bright leader, capable of developing political theory and turning it into practice, led to the actual decline of the NDKT. So Dzhemilev became the sole "leader" of the Crimean Tatar people.

As never before, Yuri's words about the Mejlis ring true today, "The Mejlis was called upon to inflame the non-Tatar population in Crimea with hysterical, openly provocative and absolutely useless "physical" actions and scandals. All these actions are mere ventures played out solely for the empire's own interests or grand national and political intrigue schemes. Mejlis is about trade and profiting from the people who are in such a dramatic state."

Yet justice will one day prevail, and "the leader of the Crimean Tatar people" will be firmly associated with Yuri Osmanov.

Exhibit S

Gazeta.ua, *Norik Shirin Killed in Garage* (21 December 2006)

(translation)

Translation

Gazeta.ua, *Norik Shirin Killed in Garage* (21 December 2006), available at: https://gazeta.ua/ru/articles/ukraine-newspaper/_norika-sirina-ubili-v-garazhe/144219

By Vladimir Grebenkin

On Wednesday, Norik Shirin, 22, the leader of Birlik (which means “Unity” in Tatar), a Crimean youth public organisation, was found killed in Simferopol. He was discovered lying in a garage near his car. There were seven knife wounds on his body.

“I’ve known him for a long time, we’ve been friends since we were five years old”, says Zhenya, 20, a friend of Norik. “He was always cheerful and in a good mood. He did not say anything bad to anyone, even if he was angry. With a smile on his face, he explained to a person what he or she was wrong about. He was fair and balanced”.

According to her, Shirin was fond of history. He wrote poetry and read some of them to his friends and acquaintances.

“It was his idea to establish Birlik. He wanted to unite the Crimean youth regardless of their nationalities. We do not belong to any political parties or forces”, Zhenya says.

Norik Shirin studied at the Faculty of Economics of the Vladimir Vernadsky Taurida National University. He was a member of the Youth Policy Council under the speaker of the Crimean Verkhovna Rada. He founded and published his own newspaper named *Golos Molodyozhi* (*Voice of Youth*). A few days ago, he received a permission from the Ukrainian National TV and Radio Broadcasting Council in Kiev to launch a youth radio station in Crimea.

Norik is survived by his parents and two younger brothers, Ibrahim, 19, and Arslan, 14.

He was buried on Thursday in Simferopol.

Exhibit T

Milli Firka, *Nothing Is Worse Than Someone Else's Rightness, Nothing Is Better Than One's Mistakes* (12 October 2010)

(translation)

Translation

Milli Firka, *Nothing Is Worse Than Someone Else's Rightness, Nothing Is Better Than One's Mistakes* (12 October 2010), available at: <http://milli-firka.org/нет-ничего-хуже-чужой-правоты-нет-ниче/>.

By Elvira Seitova

Golos Kryma No. № 41 (876), 9 October 2010

Why do you think prominent, well-known veterans of the Crimean Tatar national movement and socio-political figures have been breaking away from the Qurultay-Mejlis system, whether individually or in whole groups, for a certain period of time? After all, you will agree that making such a decision is not that simple. Withdrawing from the sole national self-government structure means losing a sense of belonging to what was supposed to be in the public domain. A solid, resilient and professional alternative is emerging today. And there are almost as many big oppositionist names as there are those who consider the Mejlis to be the only authorised representative body of the Crimean Tatars. The reason lies in the usurpation of power, the existence of only one decision-making centre, and the dominance of vested interests. Born in the womb of the Crimean Tatar people, the original system was essentially unbiased and democratic, but was then stubbornly reshaped into a court retinue, an obedient silent mass of people, and a caste of the “chosen ones”. However, as recent events have shown, it is well possible to lose the “bridle” even under those conditions. For a long time, those daring to express their views in the national parliament were advised to go out, take the air, regain consciousness, and then only go back. And those who did not understand what was expected of them at all and those who methodically refused to build themselves in the “right” framework have been called “public enemies” and accursed. There was a strong conviction that the “sacred insights”, i.e. decisions really necessary for the people, could only be born in the minds of the leaders and in no one else’s. So it turned out that while the ideas voiced by the Qurultay delegates a few years ago were then perceived by the tops as nonsense, the famous exclamation “Eureka!” was heard from the leaders after a while!



In his recent interview with *Golos Kryma*, Refat Chubarov said, “There is no longer any doubt that the elections of the Qurultay delegates, which will take place in 2012, will also be held by a secret ballot based on a universal, equal and direct suffrage. I am convinced this will be a qualitative breakthrough in the activities of the national self-government bodies of the Crimean Tatar people” (see *Golos Kryma* No. 39 dated the 24th of September). It should be noted that until now the first deputy chair of the Mejlis had been a staunch supporter of the two-tier system with 50 people electing an elector and 20 electors electing one delegate of the Qurultay. It is interesting to know what contributed to such a change in his views.

Perhaps, at the initial stage, when the structure of the national self-government was just being formed, a stepped election system was a reasonable choice. As the migration process was

underway, most people did not live at their registered places of residence, which means there was a kind of the Brownian motion of people on the peninsula. But this approach to electing the Qurultay delegates became increasingly subject to harsh criticism over time. Apparently, the frightening facts of falsification of the election results could not help but catch the eye. According to the regulation on the election of the Qurultay delegates, electors were elected at meetings of residents, but it turned out that the desire to attend such meetings was simply eradicated knocked out among the Crimean Tatars; then they chose another way by deciding to collect approvals in favour of an elector. 50 signatures collected meant the status of an elector. The trick was to obtain a form to be used by applicants when visiting their compatriots. After all, such paper descended from the Central Headquarters to the regions and from there to the local mejlises. And it was there that the coveted document fell into the hands of the “right guys”. If the chair of a local mejlis does not like you, you will never get that document even if you try as you might. The validity of all signatures was also questionable – although we will not assert they were all fabricated, but what is now called nepotism did take place.

By and large, at first glance, electoral conferences were held in an unbiased manner. The process was especially improved when representatives of political and public organisations were involved in it. Moreover, observers were introduced. We emphasise that falsifications took place at the first level, namely during the election of electors, when people were frankly deprived of their ability to directly participate in the election process. The situation clearly contributed to the establishment of a clan system.

Talks about abolishing the two-tier system and introducing a direct suffrage have become particularly acute since the mid-2000s. Realising the malignant nature of such an approach to electing delegates, Azatlyk, a well-known group of Mejlis members consisting of Nadir Bekirov, Aider Mustafayev, Sinaver Kadyrov, Eskender Bariyev, and Eldar Seitbekirov, tried to lobby for the introduction of a direct ballot. After all, this step could stimulate the Crimean Tatars by giving them an opportunity to make their own choice. That would make it possible for them to feel themselves responsible and directly involved in the national congress. A scheme of the election process and a mechanism for financing the campaign were also developed. At the 2006 Qurultay Session, Ayder Mustafayev and Sinaver Kadyrov, standing at their microphones in the delegates’ meeting room, aggressively defended their position. Their main opponents – Mustafa Dzhemilev and Refat Chubarov – sat in the presidium and completely rejected reasonable proposals made by the speakers. They insisted on the irrationality of the idea and referred to the lack of funds to implement the reform. Of course, they were supported by a majority of those present. So the idea of introducing a direct secret ballot was blocked. “When electing electors at meetings of compatriots or electoral conferences, where Qurultay delegates are already elected, if the required quorum is absent, then you can postpone the meeting or conference for one or two weeks during which you can take steps to secure the quorum. In direct elections, elections should be held everywhere on the same day, and if the elections are postponed for a week or two due to a weak turnout, they will become several times more expensive”, commented on this issue the chair of the Mejlis in his report. Should we assume that the Mejlis does not encounter any such issues today?

Years later, the initiators of the reform commented on Mr. Chubarov’s current position as follows:

Sinaver Kadyrov: “Mr. Chubarov’s statement that the upcoming elections of the Qurultay delegates will most likely be held by a direct secret ballot only shows that the awareness of the need to reform the system of national self-government of the Crimean Tatars has already reached the highest echelon of our representative body. However, if we limit our reforms to changing the procedure for electing the Qurultay delegates and decide that we have made a huge

breakthrough, then we will be mistaken. No doubt, the procedure for electing the Qurultay delegates does need to be changed, but it is equally important to reform the Qurultay itself as an institution”.

Ayder Mustafayev: “At one time, at the last Qurultay session which I participated in, Refat Chubarov did everything possible and impossible to cause a well-developed design for electing the Qurultay delegates, enabling every Crimean Tatar to participate through a direct secret ballot, to fail. Then we calculated the costs, trying to take into account everything to the smallest detail. I want to dwell on one point that fully characterises the tops of the Mejlis. Then they said, ‘Dostlar, can you imagine who will become members of the Qurultay as a result of direct elections?’ They were afraid that people who did not like them for one reason or another would become members of the Qurultay. The Qurultay-Mejlis structure, which is completely illegitimate at the moment, is trying to impose some new rules, which, again, they will control. Can we allow one and the same person to be the chair of the election commission, a member of the Mejlis, and the chair of a regional mejlis?”

However, life dictates its own rules. The elections of the recent years have shown a considerable decrease in the electoral activity of Crimean Tatars. Fewer and fewer people believe they can have any influence on the outcome of elections. Here, apparently, it turns out that Mr. Dzhemilev and Mr. Chubarov now adopt the same arguments they had completely rejected previously. So, as Sinaver-aga has already noted, the Qurultay decided to change the election system, but only at the level of local mejlises. But this initiative has been half-hearted until today. And most importantly, the elections did not take place in the Crimean capital and the Simferopol District.

It is no longer possible to ignore the fact that a new generation of politicians and officials has grown up among our people, who, through their activities, are connected with and depend on various political forces. In turn, various Crimean Tatar organisations conclude friendship and cooperation alliances with the players they like. In this situation, loudly asserting that there is only one authorised representative body of Crimean Tatars would be shaking the air in vain.

No wonder it is right now – during those critical days – that they recall the reforms again and will definitely talk about them especially loudly after the 31st of October, when the situation will become even more depressing for the Mejlis. One thing is quite obvious; if the actions taken are half-hearted and accompanied by scandals and the results are manipulated and re-voted, then there will be more harm than good from those actions.

In our opinion, there is only one way to revive the Crimean Tatar representative body and make it truly popular. This includes a number of steps to be taken. First, we should begin negotiations with all political groups of compatriots. Second, we should create an organising committee to include all and any interested persons without using any methods to downplay their roles and overestimate the importance of the Mejlis members or the Qurultay delegates. Third, we should form the Central Election Commission on a parity basis, provided that those people involved in its activities should not run for the national parliament. Only a system based on those principles should develop a provision on direct secret elections of the Qurultay delegates. Only in this case will the national congress be able to work effectively and gain the authority of an actual majority of the Crimean Tatars by showing the results of its activities. Otherwise, the centrifugal trends will increase further.

We understand that much of the foregoing does not correspond to the political nature of the Mejlis functionaries. Taking such a step would mean voluntarily recognising the fact that they are not the only authorised flagships of the nation – with all the ensuing consequences. But you can’t argue against the fact. Follow the logic. Originally, the Mejlis’ authority was indisputable. Then

some individuals and, later, groups began to break away from it. Now, a full-blooded opposition to the Mejlis is acting and developing. Every ambitious Crimean Tatar politician standing outside the Qurultay-Mejlis system is looking for and, importantly, finding partners and associates. So, sooner rather than later, the power concentrated in the hands of today's oppositionists will become really colossal. But, unfortunately, it will remain dispersed. In the end, we should ask ourselves this question; will the stubborn ignorance of compatriots having alternative views continue to prevail among the tops of Mejlis despite the fact they can foresee it now?

Exhibit U

Qurultay of the Crimean Tatar People, Regulation “On the Election of Delegates of the Qurultay of the Crimean Tatar People”, 12 January 2013

(excerpt, translation)

**Excerpt
Translation**

Qurultay of the Crimean Tatar People, Regulation “On the Election of Delegates of the Qurultay of the Crimean Tatar People”, 12 January 2013, available at: <http://web.archive.org/web/20140323224623/http://qtm.org/положение-о-выборах-делегатов-курултая-крымскотатарского-народа>.

REGULATION ON THE ELECTION OF DELEGATES OF THE QURULTAY OF THE
CRIMEAN TATAR PEOPLE

I. GENERAL PROVISIONS

Article 1. General Principles of Electing Delegates of the Qurultay of the Crimean Tatar People

1.1. Delegates of Qurultay of the Crimean Tatar people (hereinafter - delegates) shall be elected by the citizens of Ukraine - Crimean Tatars and their family members, who have reached 18 years of age on the day of voting, on the basis of common, equal and direct suffrage by secret ballot.

1.2 A Crimean Tatar citizen/citizen of Ukraine and his/her family member regardless of political, religious and other beliefs, social origin, property status, who is 21 years old on the day of election, speaks Crimean Tatar and has the right to vote can be elected as a delegate of Qurultay of the Crimean Tatar people.

1.3 The right to nominate candidates for delegates belongs to the citizens of Ukraine - Crimean Tatars and members of their families who have the right to vote. This right is exercised by them through the Crimean Tatar public and political organisations and their blocs, or by self-nomination according to the procedure set forth in this Regulations.

1.4 The number of members of Qurultay of the Crimean Tatar people shall be 250 delegates.

1.5 The election of the delegates shall be based on a mixed (majoritarian-proportional) basis:

- 200 delegates are elected under the first-past-the-post voting system in the multi-member electoral districts (hereinafter - the multi-member majoritarian electoral district) and the single-member electoral district, which includes the city of Kiev and the settlements of the Kiev region;
- 50 delegates are elected under the proportional representation system in a single multi-member electoral district (hereinafter - a single multi-member electoral district) by the electoral lists of Crimean Tatar public and political organisations and their blocs.

1.6. One and the same person has the right to simultaneously run for delegates in a multi-member majoritarian electoral district or a single-member electoral district, which includes the city of Kiev and settlements of Kievskaya oblast, and a single multi-member electoral district.

1.7 The term of office of the Qurultay delegates is 5 years.

Exhibit V

Crimea24.info, *Exceptional Violations Noted during Crimean Tatar Qurultay Elections*
(14 May 2013)

(translation)

Translation

Crimea24.info, *Exceptional Violations Noted during Crimean Tatar Qurultay Elections (14 May 2013)*, available at: <https://crimea24.info/2013/05/14/na-vyborakh-v-kurultajj-krymskikh-tatar-zafiksirovali-unikalnye-narusheniya-pravil-vyborov/>.

By watcher

The number of violations noted by observers from the Crimean Branch of the Committee of Voters of Ukraine (CB CVU) during the Crimean Tatar Qurultay elections in the Kirovsky District and the town of Sudak was high, but the nature of the violations has changed.

This is a statement made by Andrey Krisko, the head of a non-governmental organisation. According to him, problems with organising the voting process and drawbacks in the Election Regulations have come to the fore at this stage. In addition, CB CVU noted an increase in the number of cases of campaigning on election day, use of various “dirty” election tricks, and violation of the secrecy of vote.

“In one of the villages of the Kirovsky District, a candidate to the Qurultay was present at the polling station asking the voters if they knew who to vote for, and after they dropped their ballots he would try to unfold the ballots in the ballot box with a ruler to find out who the people had voted for,” said Mr. Krisko.

He added that one of the polling stations failed to open at all due to organisational problems, depriving many residents of the community of the opportunity to exercise their right to vote.

Moreover, the Election Regulations did not describe the procedure of voting at home, so the electoral commissions acted at their own discretion at each polling station; in some places they went out to all and sundry, in other places, only to those who had filed applications, while in some other cases they did not go out at all to those who were unable to come to the polling stations for health reasons.

Among the positive trends, the members of the Committee of Voters noted a significant reduction of violations related to voters receiving ballots without presenting their passports. Such violations, however, were isolated and only observed at a few polling stations. The NGO believes this is a result of the awareness campaign conducted by the Qurultay Central Electoral Commission among the members of district electoral commissions after the CB CVU traced wide-spread violations of the ballot issuance procedure at the previous voting stage.

Last week, the Crimean Branch of the Committee of Voters of Ukraine reported that the Qurultay elections in the Razdolnensky, Pervomaisky, Alushta, Feodosia and Saki Regions saw multiple violations that could have affected the election results.

As *Crimea24* has already reported, the Crimean Tatar Qurultay election campaign will end on the 15th of June. At the next stage of the elections, the voting will take place on the 25th of May in the City of Kiev and the Kiev Region.

Exhibit W

Milli Firka, *Wide-Scale Violations During Qurultay Election* (19 June 2013)

(translation)

Translation

Milli Firka, *Wide-Scale Violations During Qurultay Election (19 June 2013)*, available at: <http://milli-firka.org/выборы-делегатов-курултая-прошли-с-ма/>.

Wide-scale violations have been observed during the final stage of the 6th convocation Crimean Tatar Qurultay election in Crimea.



The violations have been noted by the Central Election Commission for the Qurultay election and by the observers of the Committee of Voters of Ukraine.

In a comment on the Qurultay election, Andrey Krisko, the head of the Crimean branch of the Committee of Voters of Ukraine, said that “from the very beginning, at the first stages, everything was very suspicious, especially the widespread issuance of ballots against photocopies rather than original passports”. According to Mr. Krisko, the number of such cases decreased significantly later on, but the observers from the Committee of Voters of Ukraine still documented some violations.

Mr. Krisko also added that violations such as failure to open or late opening of polling stations, campaigning on the voting day, failure to observe ballot issuance procedure have been recorded.

For example, a polling station in Yalta started its work more than an hour late, while another one changed its address. In the village of Saffron, Simferopol District, the polling station was closed at noon.

In the Simferopol District, some voters did not vote at their polling stations. “In the Simferopol District, one of the main violations was that some people who were registered as voters with a certain polling station went to another polling station because the first one was too far away from them. This is a clear violation because they had to choose from majority election candidates but ended up voting for completely different people,” explains the head of the Crimean branch of the CVoU.

The Crimean branch of the Committee of Voters of Ukraine will prepare recommended practices for the Qurultay Central Election Commission to improve the election procedure.

Let us remind you that the Crimean stage of the 6th convocation Crimean Tatar Qurultay election has ended in Yalta. The final stage of the Qurultay elections will be held in Uzbekistan.

Exhibit X

Milli Firka, *Their Qurultay Election Passed* (30 July 2013)

(translation)

Translation

Milli Firka, *Their Qurultay Election Passed* (30 July 2013), available at: <http://milli-firka.org/прошли-выборы-их-курултая/>.

By Ulker Amzaev

In the early turbulent 1990s, Crimean Tatars literally rushed into the Ukraine's political life with their demands, viewpoints, and self-organisation... At that time, all the public and political figures had the appearance of some sort of trainees, except for the Communists, of course, who looked like political hippos compared to other actors.

Against that background, the creation of the Qurultay-Mejlis system seemed to be a major breakthrough and pinnacle of the national self-organisation of the Crimean Tatar people. It looked like a real achievement, not only on a regional scale but for the entire Ukraine.



But the fledging period ended quite quickly, as it should have. Changes manifested themselves through deeper nation-building processes, more professional authorities, and attempts (sometimes successful) to democratise the social and political life. However, the Qurultay-Mejlis system has not been able to evolve into an established and healthy organism on track for a successful future. Despite the potential that existed.

The reason why we are talking about this is clear to many people. But the leaders and heralds of the Mejlis are persistent in positioning their brainchild as the only viable structure that should represent the Crimean Tatars and handle the distribution of all the benefits they are entitled to. These arguments are based on the allegedly popular election of the national parliament, Qurultay, which in turn appoints the right people to the necessary positions and decides everything for all.

On one occasion, when Akhtem Chiygoz, an avid spokesperson for the Mejlis, relented at a TV show, he said that discussions were permitted until a decision was made by the Qurultay, but there should be no dissent after the voting ...

Well, if that is how the question is put, then Qurultay elections must be set up perfectly. That's a given, because it is the Qurultay that puts everything and everyone right and determines the course for the entire people!

But is this really the case?

What Has the Mountain Brought Forth?

The issue of the Qurultay election system has always excited the politically active public. Let us remind you that initially the Qurultay was elected through a two-stage system: 30 to 35 voters chose one elector, then 30 electors chose one delegate (who represented approximately 1,000 Crimean Tatars), then it was changed to 50 voters choosing one elector, and 20 electors choosing one delegate. Frankly speaking, the algorithm is questionable. But it was difficult to come up with something more manageable during the fledging period.

As everyone knows, it does not take long for a growing organism to overgrow its childhood clothes. Soon, voices demanding that the Qurultay election system be revised became widespread, louder, and more convincing, as the outdated model did not ensure unbiased representation. The process reached its climax in 2006 when a group of Qurultay delegates insisted on reform, but Mejlis leaders did not even bother to listen to their “delusional ideas”.

This fact once again demonstrated the dominance of the principles of self-interest, opportunism and subjectivity on the part of the head of the Mejlis and his first deputy in the Qurultay-Mejlis system. Along with many other things, it served as the motive for a group of well-known Crimean Tatar politicians to leave the Qurultay-Mejlis system.

In 2012, a miracle of miracles, Mustafa Dzhemilev and Refat Chubarov suddenly saw the light and realised that the world had moved far ahead while they were stuck in the eternal yesterday. So they began assessing potential options for reforming the native structure. They even let their close friends think about that too, but not to delve into it too deeply or for too long.

And then it happened! At the 5th sitting of the 5th convocation Qurultay on the 12th of January 2013, a new VI Qurultay Election Regulation was triumphantly voted in. Both before and after its adoption, the seemingly bizarre document was criticised by almost everyone including the opposition, subjects of the electoral process, and the Committee of Voters of Ukraine. A detail description of this treatise would be long and tedious, a lot has already been said and written about it.

At the same time, journalists from the pro- and near-Mejlis pool, including a chorus of voices from Kiev, launched a campaign in support of the unprecedented and unheard-of “renewal” of the Qurultay. What novelties were introduced then?

The requirement to have a 50-person NGO representation in the Qurultay existed since the 1990s. However, the number of delegates from NGOs was increased neither in 2006 nor in 2013.

Therefore, an attempt to promote the creation and development of political parties in the Crimean Tatar environment failed. The reasons behind this are quite obvious. Mr. Dzhemilev has always feared competition as the devil fears holy water, so he always tries to get rid of his opponents by all means available.

The novelty brought by the new Regulations was the so-called direct election process. It should be emphasised here that no one except the leadership of the Mejlis has ever questioned the very idea of direct elections. Moreover, Mr. Dzhemilev and Mr. Chubarov publicly rejected the idea at a Qurultay session in 2006. In 2012, with their revolutionary enthusiasm and the dedication of young pioneers, they began to assure everyone that direct elections were very much needed! How come no one else had thought about it before?!

An important precondition: as far as the implementation of the will of the voter (who is not savvy in the intricacies of political systems) is concerned, the legal framework must be made, in crude terms, “for dummies”. The whole algorithm should be simple, transparent and understandable for everyone, including the young and the elderly. But what happened during the last Qurultay election was something unspeakable!

The mixed proportional / majority system – okay, the whole process stretched to last several months – okay, but how should elderly people (a dominant group of voters) distinguish between single-member and multi-member candidates, or find out in the number of those multi-member candidates in their constituency?

Moreover, the Regulations provide that any ballots with more marks than the required number are invalid, while those with less marks than required are fine. This is just a hunting ground for election fraudsters. On top of that, hardly any clarification was offered to the voters.

Let the Chips Fall Where They May...

The most recent Qurultay election least of all resembles the true expression of the will of the people. After all, the victory depended not so much on real popular support as on the process participants’ pep and ability to see the undercurrents. Experienced figures know how the desired result can be secured for their candidate or political force. By the way, the process started at the Central Electoral Commission where the drawbacks of electoral lists were used with colossal benefits for the Chubarov-led dominant bloc Milli Hak.

Then, the local mejlises put their foot in by slipping a note about the “most fit” local candidate with voter invitation cards (I also got one of those). This was sort of a hint for the narrow-minded who are unable to decide for themselves.

What happened on the election day is too fabulous for words. Out-of-constituency voters were brought in, ballots were given out in bundles, the “right” candidates’ names were pre-marked on the ballots, people were allowed to vote without presenting their passports (“Hey, what’s wrong about it, we all know each other here”), different polling districts had the same polling station, there was a mess-up with ballot counting forms, some polling stations did not even bother to put up voting booths...

Election observers were howled down. For instance, in the Kirovsky District and in Alushta, they were simply pushed out of the room. Nothing was impossible to collect the votes. There were cases of voting at home without a shadow of confidentiality, or in a store – while you’re buying some bread, buddy, why don’t you sign here for our guys as well.

Needless to say, some electoral commissions were put together with violations, illegal campaigning was taking place, ballot counts were suspicious. All this happened more than once and was thoroughly described by the media. Furthermore, while 50%+ turnout was needed for the election to be valid before 2006, only a 1/3 turnout was required from 2006 to 2013. According to the 12 January 2013 Regulations, the turnout does not matter at all, everything is decided by a relative majority.

A Qurultay Made of What Was Available...

To have a more or less valid (at least at a first glance) reformed Qurultay election was of paramount importance for the current leaders of the Mejlis. Avoidance or total failure of the elections would mean a fierce political death trap for everyone in charge. So they did their best for the occasion, using all advantages of incumbency and relying on audacity. And even with all their efforts, the turnout was only 50.49%.

Curiously, the turnout was quite low in places where the election process was strictly monitored, while in some remote villages unreachable to observers people were eager to vote, all as one, if you believe what the CEC says. It just so happened somehow that the turnout in remote places with no observer or media presence was well above 90%, while under the eye of observers or fellow competitors, the turnout was zero, or the polling station failed to open, or it closed by noon, or election results were invalid...

Am I the only one who thinks that this is weird?

The efforts of the Crimean branch of the Committee of Voters of Ukraine (CB CVU) require special attention. At the beginning of the electoral race, they strongly criticised the organisation and running of the election. But time after time, with each subsequent stage of the election, their tone became milder and more tolerant. What is the reason behind this? Could it be that the organisers managed to improve the election process during the race, or did the parties agree on a price?

The CB CVU summary of the Qurultay election results is quite interesting. In general, it comes down to the following:

“The Crimean Tatar Qurultay election in most polling districts were without any significant violations but had some organisational drawbacks that led to infringement on the voters’ rights to express their will in certain localities”.

However, Andrey Krisko, the head of the Committee, finally noted that:

“Considering the level of political tolerance demonstrated by the subjects of the electoral process in this election, if the tangle of organisational problems is removed and the regulatory framework is improved, all performance indicators of the next Qurultay election can be significantly closer to the standards of electoral law”.

It sounds like the slogan of the Soviet-era sports competitions: “Winning is not that important as participating!” That is, what he said was: yes, you have organised some sort of a process there, some things worked out, some did not, but next time please do the opposite and only then you may get closer to the standards of electoral law.

In layman’s terms, it sounds like this: “Maybe next time the election will be true and valid...”.

And this is 20 years after the first Qurultay election! During the 5th election campaign!

Recalling the last sitting of the previous Qurultay, there was so much talk about all sorts of noble men taking part in the upcoming election as international observers. But the closer the election, the quieter were these statements.

In the end of the day, the only observer of the show was the organisation headed by Andrey Krisko. One can say that they were literally dragged to the polls, because otherwise there would have been no observers at all, thus making the election results unrecognised.

The Crimean branch of the Committee of Voters of Ukraine found itself in pincers, as they came to the election not out of their passionate desire, but at the call of their fellows from the Mejlis.

Therefore, they could not tell the truth, that is, admit that this was not a real election. But they did not really want to risk losing whatever respect they may have on the eve of the presidential race, either. So they had to compose the ornate conclusion reports to somehow keep the balance.

All this, of course, did not prevent the CEC head, Zair Smedlyaev, who is literally taking money from Mr. Dzhemilev as an MP assistant, from solemnly calling it a successful election. He noted, however, that there had been problems, but no one from the Mejlis HQ was honestly going to admit that they meant failure of the election.

Instead of a Forecast

As we can see, the Qurultay election was extremely non-transparent. It's a shame to even talk about observing the traditions of the National Movement.

In fact, **there is no such thing as the Qurultay anymore!**

This is an assembly of 250 figures whom you and I are told to cherish and love, the ones who by hook or by crook got together as a group of impostors calling themselves by the holy name of representatives of the Crimean Tatar people.

Considering that it is mostly composed of crime-sponsored businessmen and old-time civil servants, there is no doubt that this assembly will be very, very obedient, regardless of the colours of the party in power in Ukraine, be they blue, or red, or even carrot-orange. No matter how pathetic they are, somewhere deep inside they realise there is no one behind them. Each of them knows the value of his credentials.

As for the snide comments such as “the winner takes it all”, it's always easy to criticise, why wouldn't you try and get elected to the Qurultay, and other incoherent nonsense...

I will say that it is better and nobler to go one's own way and do everything one can to strengthen the position of the Crimean Tatar people in their homeland, and simply work hard to this end, than to participate in dubious pseudo-political shows that have little to do with the system of national self-government and the development of the Crimean Tatar people.

Why “pseudo-political”? Because no matter how puffed-up the leaders of the Mejlis and the newly-minted delegates of the VI Qurultay are, these so-called “bodies” of national self-government have never had, and will never have, any real influence on the Crimean, Ukrainian, or national policy, because neither the Mejlis nor the Qurultay are in any way incorporated into the legal system of Ukraine, and due to this regretful fact for our people, they have no legal levers of influence, neither on the government, nor on the people, nor on anything at all.

What this entire 22-years epic of “Crimean Tatar national self-government bodies” under the leadership of Mr. Dzhemilev and Mr. Chubarov boils down to can be clearly and truly described as hand-waving.

It's exactly what the “revamped” new Qurultay will busy itself with: hand-waving and distracting Crimean Tatars from real participation in the processes of nation-building of Ukraine and the Crimean autonomy (to the delight of the enemies of our people!). Also, it is needless to say, stuffing their own pockets with state budget money and humanitarian aid earmarked for the resettlement of the Crimean Tatar people.

As for internal problems of the new Qurultay, the most interesting question for its next sitting is who is going to be the new chairman of the Mejlis. The obscenely long story of Mr. Dzhemilev's re-elections will most likely come to an end, and this time there will be a change of faces.

Who will the new leader be? Judging by the general mood, it may quite predictably be Refat Chubarov. If that is how the scenario is going to unfold, Mr. Dzhemilev's plans most likely position his first deputy as a transitional figure. After all, Refat Abdurakhmanovich is a humanitarian by nature and by life. He has few really influential connections, no access to big money, he is bad at negotiating, bad at building relationships.

That said, he is quite a recognisable character and, as we must admit, a skilful speaker who has some authority among the people.

But it seems to me that this is not enough.

Isn't that why Mr. Dzhemilev is always accompanied by the freshly baked *Aslan Omer Kyrymly* (born Aslan Umerov), a tough businessman of international stature and an extremely hard man with obvious habits of a tough authoritarian leader. It is quite possible that he is Mr. Dzhemilev's real joker.

The Qurultay of the new convocation is literally full of business people, there is a place both for local princes and for hot shots. This suggests that the bidding will be very competitive. If Enver Abduraimov managed to put Refat Chubarov in a stalemate situation in his time, it's anyone's guess what the newly minted Qurultay delegates are capable of.

In summary, we can say as a lame excuse for a national self-government system that the leadership of the Mejlis, their relatives and some quite nimble persons who can get almost anywhere have arranged for themselves is a colourful, noisy, rackety farce.

Under such circumstances, the 250 delegates can dictate their will to each other as much as they like, but they will certainly be unable to do so to the entire Crimean Tatar people!

Exhibit Y

ZN.UA, *Authoritarian democracy* (26 December 1997)

(translation)

Translation

ZN.UA, *Authoritarian democracy* (26 December 1997), available at: https://zn.ua/politics_archive/avtoritarnaya_demokratiya.html.

AUTHORITARIAN DEMOCRACY

Nikolai Semena

The split in the Crimean Tatar national movement at the Qurultay has not been overcome, but has only worsened, its veterans believe...

Last week in Simferopol an extraordinary session of the third Qurultay of the Crimean Tatars considered the crisis in the Mejlis. Addressing the Qurultay sixteen of its delegates raised the issue that "a group of unscrupulous businessmen is trying to turn the Mejlis into a "political cover" for their illegal operations related to the embezzlement of budgetary funds allocated for the Program for the Return and Settlement of the Crimean Tatar People". Even after the Qurultay, Lenur Arifov stated that "reaction and authoritarianism have settled in the Mejlis" and that the Mejlis and the Qurultay "have turned into bodies serving the interests of one person and persons close to him." "Now what young Mustafa once fought against, he is implementing in the body he heads," L. Arifov concluded.

People sympathetic to the Crimean Tatars took the news of the split with pain. After all, the Crimean Tatar national movement has been fighting for the ideals of democracy for the last several decades of its history. So what happened? Aisha Seitmuratova, a veteran of the movement, described the incident as "Stalinism," telling a correspondent of "Zerkalo Nedeli" and other journalists the following: "Mustafa is our national hero. He stood up to the pressure of the authorities and KGB, this terrible machine. Not everyone stood up to it. But Mustafa - alas! - is not a leader, with all my respect to him. Not every hero can be a leader and not every leader can be a hero...". According to her, in her New York office (Ayshe Hanum is an American citizen) there's a letter written in 1989 by Izzet Hairrov, a member of the movement who was expelled from the Mejlis during this Qurultay: "Mustafa is no longer the one for whom we fought. I do not understand what happened to him. Mustafa will lead the people to a precipice, from which we all the people will not get out...". Naturally, not everything in this story is as straightforward as it seems at first glance. All the more so because we are talking about quite influential people in Crimea. According to the poll, conducted by the Crimean independent center of political researchers and journalists, Mustafa Dzhemilev was the tenth most influential person in the past year, Lilya Budzhurova - the 18th and Lenur Arifov - the 22nd. However, Refat Chubarov shared 3-4th place, and Nadir Bekirov - 19th-20th. To understand the problem, let's listen to both sides of the argument...

Crisis, split or revolt?

Sixteen delegates, ideologically led by the Deputy Prime Minister of the autonomy, one of the leaders of the national faction in the Crimean parliament Lenur Arifov and journalist Lilya Budzhurova, stated that "the Mejlis chairman with all his authority and direct actions created the conditions in which these embezzlements were possible. The economic and financial instruments of embezzlement of budgetary funds were Imdat Bank and the "Crimea" Public Fund... the president of which is the chairman of the

Mejlis...". Sixteen delegates of the Qurultay stated that "the Fund "Crimea", having received 800 thousand grivnas from the state budget to help individual developers - our compatriots, has been keeping this money in its "pockets" for more than two years, condemning many hundreds of people to live in dugouts or unfinished houses. And this is just one example..."

In the report, which Lenur Arifov was not allowed to read to the end, he stated that having discovered the embezzlement, members of the Mejlis demanded that the account of the Capital development administration of State Committee on Interethnic Relations of the Republic of Crimea, where the money was transferred by Kiev, be transferred to another bank. But contrary to their expectations, Mustafa Dzhemilev not only did not agree to this, but refused to sign and hindered the implementation of the decisions made by the majority of the Mejlis. And the shortage of funds in the Imdat Bank account at the beginning of the outgoing year was already about 2 million grivnas and continued to grow. Lenur Arifov drew a clear scheme according to which the bank, the State Committee on Interethnic Relations of the Republic of Crimea and commercial structures acted - the budget funds from the accounts of the Capital development administration were transferred to the accounts of the "Crimea" Fund, the "Torshe" Private Entrepreneurship, the "RED" Private Enterprise, the "Sinan" Private Enterprise and the "Oasis" Cooperative, which, according to Arifov, are "the property of private firms, behind which stand several specific individuals, Crimean Tatars by nationality". Arifov states that the image of Imdat-Bank as a national Crimean Tatar financial institution is a myth, because it has never been under the control of the Mejlis, it has always been managed by only one person - Mustafa Dzhemilev.

The opposition called such a state of the Mejlis a crisis, outside observers called it a split, while Mustafa Dzhemilev himself and his colleagues tried to present the opposition's actions at the Qurultay as a revolt in the Mejlis itself. Let's listen to the arguments of the second side for full objectivity. In his report, Mustafa Dzhemilev categorically denied the "information" about his personal accounts and involvement in the ownership of commercial structures. He claimed that the money received by the firms were not embezzled, but used as loans and had to be returned. According to Mustafa Dzhemilev, one cannot "classify all debtors as thieves and embezzlers," even if "it is unlikely that these firms will be able to repay debts in the near future. He also recalled that it was the "Crimea" Fund that invested a lot of money donated by the Tatar diaspora in the Imdat Bank. He rejected accusations of authoritarianism, saying that "if even in such situations the chairman of the Mejlis cannot make volitional decisions, then why does the Mejlis need a chairman at all?" He accused journalist Lilya Budzhurova of "using standard methods of exposure," in which on television they compared the "good" houses of some Crimean Tatars with the unfinished houses of others.

In short, the Qurultay created a situation where, as it were, "two rights" collided. It would have been correct, however, under one condition - if the opposition was given a decent and normal voice. But Arifov was booed and the microphone was taken away from Budzhurova. Democracy cannot be limited; it either exists or it doesn't exist. It's good and easy to be a democrat when you have nothing. It turned out that if a manager gets to manage at least one bank and a fairly significant amount of money in it, it is almost impossible to dispose of them so that everyone was happy.

Naturally, for Mustafa Dzhemilev to let the question "about the crisis" go on its own, meant, perhaps, to be removed from politics today, when, in his opinion, this should not be allowed at all - he is included tenth in the election list of Rukh, which almost guarantees the former dissident and the leader of long-suffering people election to

Verkhovnaya Rada of Ukraine. Of course, Mustafa Bey could not take the risk, but he was afraid to trust the people (more precisely, the Qurultay delegates) and to hold, as it should be, closed voting about prolongation of his powers. As a result, voting was conducted in a usual and primitive way from the point of view of democracy - each delegate had to stand up and say - "for", "against" or "abstained", under the gaze of tough "guards".

As a result, the events have not gone at all according to the scheme expected by the opposition. The Qurultay took tough measures, but not to the "commercial and banking structures" that the rebellious delegates accused of machinations, but to themselves - all sixteen were expelled from the Mejlis, three - Lenur Arifov, Lilya Budzhurova and Nariman Abdureshitov - were recalled from the deputy fraction in the Supreme Soviet of Crimea, the decision "About the Crimean Tatar mass media" was made, which replaced the entire editorial board of the "rebellious" newspaper "Avdet"; the national editorial board on the Crimean television is ordered to have "a public council from the representatives of the Mejlis, as well as the Crimean Tatar culture, science and education"; a "concept of development of the Crimean Tatar journalism for the implementation of a common information policy" will be developed (?). Its former chairman Enver Muedinov was recalled from the revision commission. The Qurultay confirmed the authority of Mustafa Dzhemilev, the chairman of the Mejlis, and gave him additional rights - to withdraw without discussion one third of the nominated candidates (although he asked for only one tenth of them) when electing the members of the Mejlis, to veto its decisions and others. If we take into account that the veto can be overridden by only two-thirds of votes, and the chairman has the right to withdraw one third of votes even without discussion, Mustafa Dzhemilev can be congratulated - practically he has received the right of absolute veto, which actually gives him the rights of khan. If Kirsan Ilyumzhinov can be, as they write, a "democratic khan," why can't Mustafa Dzhemilev be one?

The delegates also confirmed the decision of the Mejlis on the participation of the Crimean Tatars in the elections to the Verkhovnaya Rada of Ukraine in the bloc with Rukh and adopted several other documents - an appeal to the OSCE, the UN High Commissioner for Human Rights, President of Ukraine and the Verkhovnaya Rada of Ukraine "On the continuation of discrimination of the Crimean Tatar people and the need for urgent measures to protect their rights" and the appeal to the leadership of the country "On consideration of the interests of the Crimean Tatar people in the privatization process in Ukraine", which, however, in connection with the issue of the Mejlis crisis are kind of in the shadow.

What is the result?

Mustafa Dzhemilev, in terms of overcoming the crisis, considers the Qurultay to have "achieved its goals." The opposition, hoping that the Qurultay would calmly listen to them and delve into the problem, left the congress.

And yet the losses from the Qurultay were probably greater than the gains. First of all, the movement practically lost its image as a democratic movement, and accusations of authoritarianism poured in against the head of the Mejlis. Secondly, the movement has now completely lost its unity, which even before was questioned by the presence of the Crimean Tatar National Movement and the disagreement with the official line of the Mejlis of some representatives of the movement in Moscow, Krasnodar, and other regions. Such "fragmentation" in the near future will take away a lot of power for internal discord, which could have been spent with greater benefit.

Thirdly, Mustafa Dzhemilev must clearly realize that a significant part of the veterans of the movement are against him, and in time their archives, scattered today all over the world, will be opened, where you'll probably find even more sudden letters than quoted by Aisha Seytmuratova. As a politician, he apparently understands that it is time that will paint his final image for history, and he doesn't care what that portrait will be. This Qurultay added a lot of unflattering material for him...

Exhibit Z

Milli Firka, *Who and How Ripped Off the People in the Mejlis* (25 March 2011)

(translation)

Translation

Milli Firka, *Who and How Ripped Off the People in the Mejlis* (25 March 2011), available at: <http://milli-firka.org/кто-и-как-в-меджлисе-обворовывал-народ/>.

Who and how ripped off the people in the Mejlis

Today everyone is aware of the rapid decline in the authority of the Mejlis among compatriots and, first and foremost, of its leaders, M. Dzhemilev and R. Chubarov. The first attempt to "cleanse the Mejlis from within" was made in 1997 by a "group of 16" members of the Mejlis at the time who were outraged by financial machinations around budgetary funds perpetrated by the Mejlis leaders through the notorious and no longer existing "people's" "Imdat-Bank".

The protest by fighters for truth and democracy in the Mejlis was crushed, and the troublemakers were severely obstructed, finding themselves "out of the business" of the Qurultay-Mejlis. "MF-Inform" decided to return to those events, after which the processes of internal degradation of the Mejlis could no longer be hidden from the public.

We bring to your attention materials of newspaper "Avdet" No.23 (186) dated 31 December 1997 which are opening just a little part of what and how Mustafa Dzhemilev and his today's closest surrounding started to fall "from pedestal". I give the floor to Enver Muedinov.

Report of Enver Muedinov,

Chairman of the Review Committee of Qurultay

Dear Qurultay delegates!



In its activities, the Review Committee was guided by the Regulations on the Review Committee, approved by the Qurultay. During the reporting period after the first session of the III Qurultay the Review Committee held 12 meetings where there was always a quorum for taking decisions. During this period the Review Committee has considered about 20 applications.

The essence of many applications boiled down to almost one thing: to assist in solving the housing problem. Besides, there were applications from inhabitants of Ukrainka village about doubts in the results of elections of the chairman of Mejlis of Ukrainka village and applications from delegates of Kirov regional conference about violations during the conference.

All the applications were checked, the results of checks were discussed at the meetings of the Review Committee and decisions were made.

Audits of the financial and economic activities of the "Crimea" Fund for 1996, accounting department of the Mejlis for 1996, and 10 months of 1997 were conducted. I will elaborate on the results of the audits below.

The Review Committee attended all the meetings of the Mejlis during the reporting period.

The Review Committee of the Qurultay several times made statements and initiated meetings of the Mejlis and consideration of such issues as:

- on the activities of commercial bank "Imdat-Bank" and the transfer from this bank of the Capital development administration of Republican Committee of the Autonomous Republic of Crimea account;
- on the activities of the deputy faction "Qurultay" in the Supreme Soviet of Crimea.

At the request of the Mejlis Chairman, the Qurultay Review Committee checked the reasons for the disruption of the Mejlis meeting in Foti Sala village.

The Review Committee, carrying out its work in a rather difficult environment, carried out the functions entrusted to it by the Qurultay.

The crisis in the Mejlis of the Crimean Tatar people could not but affect the Qurultay's Review Committee.

Until recently, there was no particular disagreement in the Review Committee. I, as the Chairman of the Review Committee, trying to comply with the principles of democracy, obeyed the decisions taken, although I didn't always agree with the decision. But when some members of the Review Committee tried to act as censors to forbid me to speak about negative phenomena discussed in the sessions of Mejlis, I refused to obey. This ended with the Review Committee meeting deciding to remove me from my position by expressing distrust of me, which only the Qurultay can do.

Thus, some members of the Review Committee in their eagerness to silence everyone who is unwanted are even exceeding their authority and violating the regulation on the Review Committee of the Qurultay. I have informed you about this in detail in my statements to the media.

Only the Qurultay may assess the activities of the Review Committee and hence my work as the Chairman of the Review Committee elected at the Qurultay, so I am submitting to your judgment a report on the work done by the Review Committee of the Qurultay.

I bring to your attention the report compiled without embellishing the facts, but also without glossing over the painful problems, the attempt to solve which led to the crisis in Mejlis.

So far, the desire not to wash dirty linen in public has worked for us while discussing these or those questions. But in order to understand the reasons of the created crisis it is necessary to wash this dirty linen as long as without telling the truth we won't achieve unity and solidarity of the national movement, without this it will be difficult to gain trust of the people, which has been noticeably shaken lately.

Some members of the Mejlis and the Review Committee are trying to blame for the crisis situation on those members of the Mejlis who sought to bring order to the Mejlis and in the distribution of funds allocated under the Program for Return and Settlement of the Crimean Tatar People. All the "guilt" of these members of the Mejlis is that they made public the negative phenomena that were happening with the funds allocated under the program. And the Chairman of Mejlis M. Dzhemilev and his supporters are against publicising these facts.

Disclosure of which facts are the Chairman of Mejlis and his supporters afraid of?

At the Mejlis meetings from August 1996 to March 1997 the questions about the efficiency of the use of budgetary funds allocated under the Program for the return and settlement of the Crimean Tatar people and the principles of the relationship between the Mejlis and "Imdat-bank" were considered 6 times.

During this time, we witnessed how Mejlis commission was established to make recommendations on the activities of "Imdat-Bank", how extraordinary meetings of the Mejlis were initiated at the request of 13 members of the Mejlis and at the decision of the Review Committee in order to cancel the decisions made. We also faced such a fact as the refusal of the Mejlis chairman to sign and execute adopted decisions without taking into account the opinion of the majority of Mejlis members.

Even then, the first signs of the impending crisis appeared, but the Chairman of Mejlis M. Dzhemilev did nothing to eliminate the crisis phenomena, but on the contrary, did everything possible to deepen it.

The opinion of the majority of Mejlis members was categorical: to transfer the budget account of the capital development administration from "Imdat-bank" to one of those authorised by the national bank of Ukraine to service budget funds, thereby expressing distrust in the activities of "Imdat-bank" and its management.

The Mejlis Chairman, realising that he could not change the mind of the majority of the Mejlis members, went to an extreme step: it was stated that the Mejlis Chairman would resign if the budget account of the capital development administration was withdrawn from the "Imdat-bank". With this step, M. Dzhemilev went to the political blackmail of the Mejlis. He made it clear to everyone that he would reject any decision to withdraw the capital development administration account from the "Imdat-Bank".

What does the Chairman of the Mejlis and his supporters actually stand for, and what do most members of the Mejlis oppose so strongly?

Why does the Chairman of Mejlis M. Dzhemilev persistently continue to defend his pet project - "Imdat-bank" without taking into account the opinion of the majority of Mejlis members?

And everything turns out to be in the control, or rather, in the uncontrolled spending of budgetary funds allocated under the Program for the return and settlement of the Crimean Tatar people, in order to keep "Imdat-bank" afloat.

At one time, when "Imdat-Bank" was organised, it was entrusted with the functions of control over the efficient spending of funds allocated under the Program through the Public Fund "Crimea", which is one of the founders of the bank.

Much in the activities of "Imdat-bank" is hidden behind the term "commercial secret". No one can learn anything about the activities of the bank without the consent of all the founders of the bank.

In October 1995, by order of the Chairman of the Mejlis, a commission of the Mejlis conducted the first and so far the only partial inspection of "Imdat-Bank".

In parallel with this inspection by the commission, an audit of the "Imdat-Bank" activity was carried out by the specialists of an independent financial expertise from Kharkov, at the invitation of the Chairman of the Mejlis. The main purpose of the audit was to make a clear picture of the bank's activities.

Much about the activity of "Imdat-bank" became known due to the results of these inspections. Inspection reports were presented to the Chairman of Mejlis M. Dzhemilev. But the results of the inspections were so unexpected and overwhelming even for M. Dzhemilev that he decided to hide the acts of inspection under the carpet and, rolling up his sleeves, takes decisive measures to save the bank.

So what did the inspections on the activity of "Imdat-Bank" reveal, and what results of the inspections did the Chairman of the Mejlis decide to hide?

Here are a few excerpts from the act of inspections:

The bank's insolvency was caused by the fact that the bank's management... in violation of the requirements of the National Bank of Ukraine, regulating lending activities, in January-September 1994, issued loans totaling 72.303 billion krb. (karbovanets), which have not been repaid even at the time of the inspection. The issuance of unprofitable loans was made without analysing their recoverability and security.

The most serious mistake of the bank officials mentioned above is that credit resources were provided to a number of companies that already had outstanding loans and fees for using credit resources in this bank.

As a result of the inactive credit policy of the Council and the Board of the Bank, "Imdat-Bank" incurred losses amounting to 178.703 billion krb. (non-repayment of issued and guaranteed loans, lost income, as well as losses from interbank credit operations).

Despite the created situation, when the bank incurred losses, the Council of the Bank set the salary for the employees of the bank - 15% of the income received by the bank.

Incompetence of the management of "Imdat-bank" led to the fact that the bank was on the verge of bankruptcy. Changing the chairmen of the Board of "Imdat-bank", one after another, they tried to save the situation. Only in 1994, 5 chairmen of the bank's Board changed.

In an interview with a correspondent of the "All-Ukrainian News", R. Kenje, a former chairman of the bank's Board, stated that he had not worked at the bank when it was suffering losses. This is an impertinent lie. What can you expect from a man who does his best to justify these actions?

R. Kenje was forced to write a notice of resignation from the post of Chairman of the Bank during the inspection of "Imdat-bank" by the Commission of the Mejlis, i.e. in October 1995.

The 53rd meeting of the Mejlis adopted a decision in relation to R. Kenje as well, but no one executes this decision because of the disagreement of the Chairman of the Mejlis with it.

The tape recording of the 53rd meeting of the Mejlis and the minutes of the meeting of 24 August 1996, where the decisions on the account of the capital development administration in the "Imdat-Bank", on the bank officials were taken away and are kept personally by M. Dzhemilev.

The leadership of the Mejlis, the Imdat-Bank and the State Committee on National Security were busy with one problem - how to find funds to replenish the hole that had formed due to non-repayment of loans. They found both ways and means.

These were the budgetary funds of the Capital development administration of Republican Committee of the Autonomous Republic of Crimea under the Program for the Return and Settlement of the Crimean Tatar People. They used persuasion and, if necessary, threats of physical violence in order to use the budget funds to the benefit of the bank founders and the managers of some companies. Through these companies and small businesses the budget funds intended for the arrangement of the Crimean Tatar people, flowed into the pockets of managers of various ranks, and the people began to be openly deceived, hiding behind the assurances that official Kiev is gradually phasing out funding for the Program of Return and Settlement of the Crimean Tatar People.

Capital development administration of Republican Committee of the Autonomous Republic of Crimea, its budget account in the "Imdat-bank" was the very cash cow, from the funds of which the bank still existed.

How else can be explained such a fact that the allocation of 80 billion krb. by the Capital development administration of the "Crimea" Fund in August 1995, which, according to the order of the State Committee of National Security, were intended for the payment of financial aid to individual developers for the completion of houses, were used by the President of the "Crimea" Fund M. Dzhemilev for strengthening the financial position of the "Imdat-bank", for the repayment of debts on loans previously taken by a number of small enterprises and companies.

In order to give the appearance of legitimacy of use of 80 billion krb. received from the Capital development administration, the contracts were concluded between the "Crimea" Fund and the "Geos" and "Arsen-bey" enterprises for the supply of building materials, and the money was transferred to these enterprises in the amount of 63,0 billion krb. and 10 billion krb. respectively, leaving 7,0 billion krb. on the current account of the "Crimea" Fund. But in those two years not a single karbovanets worth of building materials has been delivered.

Where was the money spent? With this money "Geos" and "Arsen-bey" enterprises bought their promissory notes in the "Imdat-bank".

Moreover, at the expense of the above mentioned 63.0 billion krb. "Geos" enterprise repaid the debts of the following enterprises:

1. "Zodiac" enterprise 9.9 billion krb.
2. "Turk-Krym" LLC 10.0 billion krb.
3. "RED" enterprise 12.7 billion krb.
4. "Sparta" LLC 4.62 billion krb.
5. "Ecotech" LLC 4.0 billion krb.
6. "Cruz" enterprise 4.7 billion krb.
7. "Avesta" enterprise 4.6 billion krb.
8. "Krymzemstroj" enterprise 4.6 billion krb.

And the "Arsen-bey" enterprise, at the expense of the public fund "Crimea" received 10 billion krb, has repaid debts of the enterprise "Marat-94" in the amount of 2,0 billion krb.

The way in which after some time the appearance of payment of a part of debts between "Geos" enterprise and Fund "Crimea" was created refers to the category of puzzles and when solving them one starts to wonder: who took credits after all and why one enterprises pay debts of other enterprises and what source was chosen for repayment of debts?

From March 12, 1996 to July 15, 1996 "RED" enterprise transferred to the Fund "Crimea" 25 219 565 000 krb., drawing up payment orders as a repayment of accounts payable. But in the accounting documents in the Fund "Crimea" there is no confirmation of the document on the presence of such debt, but there is a letter from the "RED" enterprise that the transferred amount of 25 219 565 000 Krb is the payment of the debt of "Geos" enterprise.

S. Tokhtarov was the Director of the "RED" enterprise and the Chairman of the Board of "Imdat-bank" at that time, and he probably chose budgetary funds as the source for paying the debt.

The events that happened after that belong to those that are called incredible. The leadership of the "Crimea" Fund decided to use part of the funds coming from compatriots living abroad to replenish the Fund's current account in the "Imdat-Bank". For this purpose, \$31,497 was allocated and handed over to S. Tokhtarov for currency exchange and crediting to the current account of the "Crimea" Fund.

For the execution of this operation S. Tochtarov chose the "Geos" enterprise. The "Geos" enterprise transfers 58107 grivnas to the "Crimea" Fund by issuing a payment order, as a return of accounts payable. Is this not absurd? The funds of the "Crimea" Fund are used to pay off debts to the "Crimea" Fund.

How can one think of choosing a partner to credit funds to a company that has been indebted to the "Crimea" Fund for more than one year? According to the accounting documents, "Geos" enterprise reduced its debt to the "Crimea" Fund at the expense of the funds received by SME "RED" and for the currency received. According to accounting documents, "Geos" enterprise reduced its debt to the "Crimea" Fund through funds received by "RED" enterprise and for the currency received.

All the funds received from "RED" enterprise and "Geos" enterprise the management of the Fund "Crimea" decided to direct for payment of material aid to individual developers for the completion of houses. In 1996, 347.776 grivnas 50 kopecks was allocated for payment of financial assistance to the developers, and to date the indebtedness of the "Crimea" Fund to the developers in the amount of 4,522,234 grivnas 50 kopecks remains.

But what happened with 80 billion krb. is not the only thing that happened with the budget funds. In the same way, 45 billion brb. was used to repay the debts of some enterprises through the "Poisk" enterprise and the "RED" enterprise. A total of 8.9 billion krb. was misappropriated through the "Toria" enterprise on August 7, 1996. And there are dozens and dozens of such facts.

From the outside it seemed that official Kiev did not notice, to put it mildly, "these tricks" of the "Imdat-bank" management. But, to its credit, the Ukrainian government has taken steps to streamline the budget. In accordance with Cabinet of Ministers Resolution No 401 of 03.04.96, enterprises and organisations financed from the state budget were obliged to transfer accounts to authorised banks determined by this resolution before 15.05.96. However, this decree, as well as the decisions of the Mejlis taken in accordance with this decree, have not been implemented to date.

The most vigorous opposition to the withdrawal of the Capital development administration account from "Imdat-Bank", following the decision taken at the Mejlis meeting, came from M. Dzhemilev and R. Kenje, a deputy of the Supreme Soviet of Crimea and former chairman of the bank's Council.

At a time when one part of the Mejlis members were trying to bring order to the use of budgetary funds, another part was actively working to keep the budgetary account of the Capital development administration in the "Imdat-Bank".

Without discussing it at meetings of the Mejlis, they held secret negotiations with the Chairman of the Council of Ministers of the Autonomous Republic of Crimea, A. Demidenko, and the Permanent Representative of the President of Ukraine in the Autonomous Republic of Crimea, V. Kiselev. As a result of these negotiations, a letter was initiated to the Prime Minister of Ukraine P.I. Lazarenko. I will read an excerpt from this letter:

"The incompetence of the former management, which manifested itself in misconduct, seriously complicated and worsened the financial situation of the bank, the new composition of the Council and the Board of the bank are taking measures to resolve the crisis situation. In these conditions, the control and audit department and the state treasury department of Simferopol charged the amount of 2,772,218 grivnas 85 kopecks on the balance of budgetary funds with penalties, while the authorised capital of the bank is 1,200,074 grivnas.

Taking into account the role of "Imdat-bank" which activity is under constant control of the Supervisory Board and the "Qurultay" faction of the Supreme Soviet of Crimea, I ask to consider it appropriate to withdraw the collection orders and give it the status of an authorized bank for servicing the funds sent from the State Budget of Ukraine, to finance the return and settlement of the Crimean Tatar people."

How they controlled, and how they wanted to control the use of budgetary funds, we have shown above.

How can we hope that the leadership of "Imdat-bank" will finally begin to show a sense of compassion for their people if they continue to steal from the Capital development administration, but now in a different way.

Imdat-bank's management takes inter-bank loans and lends them to the Capital development administration at a higher interest rate. During the first five months of 1996, the Capital development administration paid "Imdat-bank" interest of 205,278 grivnas and 27 kopecks, while "Imdat-bank" transferred 54,610 grivnas 66 kopecks for interbank credits to "Krym-credit" bank. The difference in the amount of 150,667 grivnas 61 kopecks is the profit of "Imdat-bank" received at the expense of the Capital development administration.

The "Crimea" Fund, being the founder of the bank, has more than 362 thousand grivnas in the "Imdat-bank" statutory fund, but has not received a single penny of dividends for these years.

So who do the resources of the fund work for and who gets dividends from it?

The answer to this question can only be given by the management of the "Crimea" Fund and "Imdat-bank".

The funds invested in the "Imdat-Bank" statutory fund by the management of the "Crimea" Fund are the funds collected on the donations of compatriots abroad, for the improvement of the entire nation, and not for the profits of a number of high-ranking leaders.

The funds for the operation of the "Crimea" Fund are allocated by the President of the Fund M. Dzhemilev. Only M. Dzhemilev knows the true sources and quantity of the incoming funds. The Crimean Republic cannot say anything about it. Therefore, the verification covers that part of the documents which were provided to us.

Having failed to eliminate the contradictions that led to the confrontation in the Mejlis when addressing the issue of the effectiveness of the use of budgetary funds, the Mejlis Chairman continued to rely on the support of the majority of the Mejlis members when addressing other issues. This was particularly evident in the discussion of candidates for nomination to the new Crimean government

A majority of Mejlis members did not support the candidates for the Crimean government proposed by the Mejlis chairman. But M. Dzhemilev, without a decision of Mejlis, considered that Ennanov's candidacy for the post of Minister of Social Protection was the best one, and

disregarding the opinion of the majority of Mejlis members, who rejected this candidacy, supported Ennanov and achieved his approval in this post.

The Mejlis chairman understood that decisions in Mejlis meetings are made by a majority vote of the Mejlis members, but he also understood that he could not persuade the majority of the Mejlis members to support his ideas.

And so, in this difficult situation, the Chairman of the Mejlis decided to go on leave, until the Qurultay session.

He was well aware that the Mejlis Rules do not foresee a situation where the Mejlis chairman goes on long-term leave on his own initiative before the Qurultay session.

The Mejlis meeting offered M. Dzhemilev to go on leave for 2-3 months, but he refused and insisted on taking leave until the Qurultay session.

And then the Mejlis meeting was forced to assign the duties of Mejlis chairman to the First Mejlis Deputy Chairman R. Chubarov until an extraordinary session of the Qurultay.

Having gone on leave, M. Dzhemilev became more active and began to meet more often with his compatriots in different regions of Crimea, which he did not do so often before.

Two weeks later, at a meeting of the Mejlis, R. Chubarov made a statement that he was physically unable to combine his duties as deputy chairman of the Supreme Soviet of Crimea and acting deputy chairman of the Mejlis, and asked to be relieved of his duties as chairman of the Mejlis.

But the real reason of R. Chubarov's unwillingness to act as Mejlis Chairman is that though Mejlis Chairman M. Dzhemilev went on holiday, he continued active work and all questions were agreed with him without taking into consideration Acting Mejlis Chairman, and that he is not willing to work in such circumstances.

The members of the Mejlis faced a dilemma: how to break the deadlock, how to untangle the tangle of painful problems in a situation when the Mejlis leadership withdrew from solving them, aggravating the crisis in the Mejlis.

All members of the Mejlis understood that any decision taken by the Mejlis would go against the rules of procedure of the Mejlis.

At such a critical moment when the issue was put forward: should the Mejlis be the representative body of the people, the majority of Mejlis members accepted Mr Chubarov's statement that he would step down as Mejlis chairman and hand his duties over to Reshat Ablaev on a temporary basis until an extraordinary session of the Qurultay.

Concluding my report, I would like to hope that the delegates of the Qurultay will have the courage to assess in a balanced and objective manner the activity of the Mejlis and its President and moreover, to assess the causes of the crisis. I hope that Qurultay will find the ways of getting out of the crisis and create opportunities for strengthening the positions of the system of representative bodies of Qurultay and Mejlis of the Crimean Tatar people.

It will depend on you, the Qurultay delegates, what composition of the Mejlis you will choose.

But we must not allow the authority of the Mejlis to be used for mercenary purposes, by people with impure intentions - whoever these people are, whatever merits they have before the people.

You have a difficult decision to make, on which the unity of the people will depend.

I think Qurultay decisions will be realistic and their realisation will contribute to the restoration of rights of our people, their return and settlement on their native land.

Enver MUEDINOV

Newspaper "Avdet" No.23 (186) dated 31 December 1997

MF-inform

Exhibit AA

Millie Firka, *How Dzhemilev Ripped Off Three Orphans* (12 October 2013)

(translation)

Translation

Millie Firka, *How Dzhemilev Ripped Off Three Orphans* (12 October 2013), available at: <http://milli-firka.org/как-джемилев-трех-сирот-обокрал/>.

How Dzhemilev Ripped Off Three Orphans

Information about Mustafa Dzhemilev's financial fraud has been appearing in the media since the 1990s. However, all these years, Dzhemilev's supporters were quick to dismiss all the "insinuations", demanding documentary confirmation of the accusations.



This has always been more difficult as the process of moving money or material assets in circumvention of existing laws and regulations bypassing existing laws and regulations from one owner to another usually takes place without witnesses and without signing any papers.

But even the with the documented facts of Mustafa Dzhemilev's financial scams he has time and again gotten away with it. The Mejlis leader is protected by his popularity "behind the scenes" and parliamentary immunity.

For example, in 1997 the chairman of Audit commission of the II Qurultay Enver Muedinov prepared a report in which he highlighted the results of the audit of financial activities of the "Crimea" Fund, the accounting department of Mejlis and the commercial "Imdat-Bank" supervised by M. Dzhemilev, through the accounts of which the budgetary funds allocated by Ukraine for the accommodation of the Crimean Tatars passed.

E. Muedinov's report uncovered the facts of colossal financial abuses, indicated the machination schemes and named the counterparties to whom the budgetary funds were transferred in circumvention of the law.

However, M. Dzhemilev's specially organised team of "loudmouths and whistleblowers" did not allow the speaker to make a report at the Qurultay.

But the report of the head of Qurultay Auditing commission was published in the newspaper "Avdet" №23(186) of 31.12.1997 and after all became known to public, supervisory and law enforcement agencies - but there was no reaction from Finance Ministry, Treasury or Economic Crimes Unit.

On the other hand, there was an immediate reaction from Dzhemilev: the Chairman of the Revision Commission Enver Muedinov was immediately removed from the Qurultay.

After such a frank carte blanche of the authorities to embezzle people's funds, the number of those wishing to catch M.Dzhemilev by the hand has sharply decreased...

And this is only with regard to budgetary funds. As to the humanitarian aid, which fall into the hands of Mustafa Dzhemilev, the head of Mejlis never reported to anyone, neither to the people, nor to Qurultay.

According to various foreign data, the total amount of material assistance of the international community to the Crimean Tatar people for two decades is from one to one and a half billion US dollars!

Thus, for example, the former ambassador of Turkey in Ukraine Ahmed Byulent Merich in one of his speeches confirmed that Turkey alone transferred for the needs of the Crimean Tatar people more than 20 million dollars.

The way M. Dzhemilev distributes the money that fall into his hands is evidenced by the recent financial scandal related to the charitable assistance to Crimean Tatars by a well-known businessman from Turkey, chairman of the Federation of Crimean Societies and Society of Culture and Mutual Aid of the Crimean Tatars of the city of Kocaeli Ibraim Araci.

The essence of the scandal is as follows.

Twice, in November and December 2011, Ibraim Araci transferred 50,000 US dollars each to the account of the "Crimea" Fund, whose founder is Mustafa Dzhemilev. This was his contribution for organising the II World Congress of Crimean Tatars in Turkey, in Eskisehir.

(32A) VALUE DATE/CURR./INTERBANK SETTLED AMOUNT	
DATE	23.11.2011
CURRENCY CODE	USD
AMOUNT	50'000.00
(33B) CURR./INSTRUCTED AMOUNT	
CURRENCY CODE	USD
AMOUNT	50'000.00
(50R) ORDERING CUSTOMER - NAME & ADDRESS	
	VEFA İBRAHİM ARACI
	İZMİT - TURKEY
(52A) ORDERING INSTITUTION	
(53A) SENDER'S CORRESPONDANT	
(54A) RECEIVER'S CORRESPONDANT	
(55A) THIRD REIMBURSEMENT INSTITUTION	
(56A) INTERMEDIARY INSTITUTION	
(57A) ACCOUNT WITH INSTITUTION	
(59) BENEFICIARY CUSTOMER	
	CHARITABLE ORGANIZATION
	FOND CRINEA
(70) REMITTANCE INFORMATION	
(71A) DETAILS OF CHARGES	IRRETRIEVABLE FINANCIAL HELP
	01R

(32A) VALUE DATE/CURR./INTERBANK SETTLED AMOUNT DATE CURRENCY CODE AMOUNT	08.12.2011 USD 50'000.00
(33B) CURR./INSTRUCTED AMOUNT CURRENCY CODE AMOUNT	USD 50'000.00
(50K) ORDERING CUSTOMER - NAME & ADDRESS	MEJLIS DZHEMILEV VEFA IBRAHIM ARACI CIVILIAN - URBAN ISMIT - TURKEY
(52A) ORDERING INSTITUTION (53A) SENDER'S CORRESPONDANT (54A) RECEIVER'S CORRESPONDANT (55A) THIRD REIMBURSEMENT INSTITUTION (56A) INTERMEDIARY INSTITUTION (57A) ACCOUNT WITH INSTITUTION (59) BENEFICIARY CUSTOMER	CHARITABLE ORGANIZATION FOND CRIMEA IRRETRIEVABLE FINANCIAL HELP EUR
(70) REMITTANCE INFORMATION (71A) DETAILS OF CHARGES	

However, the Mejlis flatly refused to hold the congress in Turkey.

Later, on 4 May 2013, a meeting of representatives of the Crimean Tatar diaspora abroad was organised in Crimea to discuss where and when to hold the Second World Congress of the Crimean Tatars.

It was decided to hold it only in Crimea.

Ibraim Araci was also present at this meeting. He did not agree with the decision and left the meeting without waiting for the end of the event.

And suddenly, in violation of all the agreements, in the autumn of 2013 the head of the Mejlis' Foreign Relations Department Ali Khamzin spread information that the II Congress would be held not in Crimea and not even in Turkey, but in Romania (?!), which caused a sharp negative reaction from the Crimean Tatar diaspora in Turkey, which invested a lot of effort and money into the preparation of the II Congress.

One of the manifestations of this reaction was the quite reasonable question of the fate of the \$100,000 transferred to the accounts of the Dzhemilev's "Crimea" Fund.

Mustafa Dzhemilev habitually decided to remain silent...

Here are the texts of two letters addressed to Mustafa Dzhemilev by Ibraim Araci regarding the fate of the 100,000 dollars he sent to the head of the Mejlis.

Letter 1:

Sent: Monday, September 23, 2013

Dear Mustafa Dzhemilev.

As you know, on May 4, 2013 we took part in a meeting at the restaurant "Ayshe" in Simferopol at your invitation.

After that meeting, you wanted the Ankara General Centre and especially dear Mukremin Şahin, the chairmen of the societies belonging to our federation (e.g. dear Ergin Batur) to confirm that the money I sent you, you allegedly returned to me.

However, the people mentioned could not have been informed in any way concerning this subject.

I personally have never spread the word about the money given to charity. I have never demanded or wanted the return of cash and non-cash funds invested in Crimea. I sent that money to support my compatriots, to help the people. I would like to remind you that I did not demand the return of funds. But if you did send the funds, I DID NOT RECEIVE them and they WERE NOT RETURNED.

Please provide details of where you said you returned the funds you received in the amount of 100,000 (one hundred thousand) dollars. Details of the \$100,000 income are given in the annex below.

Out of the funds which you are very well aware of, I ask you to allocate to the Rector of KIPU (Crimean State Engineering and Pedagogical University), Fevzi Yakubov the sum of \$20,000 (twenty thousand) dollars on my behalf. If you do not need the remaining amount, please let me know and we will distribute this money to the people.

All the best.

V. İbrahim Aracı

Chairman of the Federation of Crimean Societies and Society of Culture and Mutual Assistance of the Crimean Tatars of Kocaeli.

Letter 2:

V. İbrahim ARACI

Sent: 30 September 2013

Dear Mr. Mustafa Dzhemilev.

I want to inform you that I have not received a response to the email dated 23 September 2013.

As you know, there are three orphans of our tribesmen living in Saki. I ask you to allocate \$20,000 from this amount for their purchase of a house.

I would like to ask you to provide information about the amount of these funds allocated for charity on the holiday of Oraza Bayram from the Kocaeli Society of Crimean Tatars.

All the best.

According to a Turkish source, İbrahim Aracı has not yet received a response from Mustafa Dzhemilev.

Also, neither the three orphans from the city of Saki nor the rector of the KIPU, Fevzi Yakubov, have received financial assistance.

* * *

The above case is just one small episode of Mustafa Dzhemilev's more than 20 years of "haymaking" in the fat field of foreign charitable aid to the Crimean Tatar people.

What conclusions can be drawn from the described situation?

Firstly, it's time for the Crimean Tatar public, and first of all the Qurultay delegates, to demand from the Mejlis head and heads of the organisations accountable to him - "Crimea" Fund, "Crimea Development Fund", "League of Crimean Tatar women", "Maarifchi" Association and others, participating in receiving and distributing humanitarian and charitable aid - a full and public report about the amount of humanitarian aid received in recent years, as well as about its distribution and final recipients.

Second, the Crimean Tatar community needs to establish an effective system for receiving and distributing charitable aid, with mandatory monthly public reports by the recipients and distributors of humanitarian and charitable aid on the amount of aid received and its distribution to those in need, as well as on the principles and criteria for selecting candidates and projects to receive such aid.

Thirdly, the Crimean Tatar public should publicly call on the international community, charitable foundations and the Crimean Tatar diaspora to ensure transparency and openness in sending humanitarian and charitable aid to the Crimean Tatar people and its distribution in Crimea. And to ensure that these principles are strictly adhered to.

Without this, embezzlement and abuse will continue in the future, no matter who is at the helm of the Mejlis, inevitably leading the people to further impoverishment and degradation...

Milli Firka Press Service

Exhibit AB

VKontakte, Crimea24.tv, *Mustafa Dzhemilev sold most of the humanitarian aid handed over from Turkey to Crimean Tatars* (3 February 2023)

(translation)

**Transcript
Translation**

Vkontakte, Crimea24.tv, *Mustafa Dzhemilev sold most of the humanitarian aid handed over from Turkey to Crimean Tatars (3 February 2023)*, available at: https://vk.com/crimea24tv?z=video-116028735_456268795%2F368833c9596954b4ed%2Fpl_post_-116028735_170054.

[00:02]

[Speaks Russian]: Yes, in the late nineties and noughties, humanitarian and financial aid for the Crimean Tatars came mainly from Turkey. All flows were controlled personally by Mustafa Dzhemilev, but the people themselves did not feel this support in any way. The head of the Federation of Crimean Tatar Cultural Societies of Turkey, Univer Sel explains the details.

[00:20]

[Speaks Turkish] [Translated into Russian]: Crimean Tatars began returning home to Crimea from exile in 1989. Two years later, the Soviet Union collapsed and the Crimean Peninsula became part of the now independent Ukraine. Since then, Turkey's assistance to our compatriots in Crimea has increased dramatically. Much of this aid was provided by the Turkish state. Crimean Tatars in Turkey also collected aid through Crimean associations and delivered it to Crimea. Mustafa Dzhemilev took responsibility for a significant portion of these inflows. However, a number of actions that were allegedly taken for the benefit of the Crimean Tatar people were not successful. During the presidency of Suleiman Demirel in Turkey financial and humanitarian aid was sent to Crimea to build a hospital. In the end, the hospital was never built. The most major issue for Crimean Tatars was dwelling. For this purpose the aid was sent from Turkey to Crimea. As a result, there are no houses and no funds. Over the years, much of the humanitarian aid collected from Turkey and sent to Mustafa Dzhemilev has been distributed around himself. Senders witnessed that the better half of this aid was sold in markets and with wholesalers. Presently separated from Ukraine the Zaporozhye and the Kherson regions were historical lands of the Crimean Khanate and the Crimean Tatar population lived there. In 2014, these people relocated to Crimea. And their remaining houses, fields, hotels, factories and restaurants were looted by representatives of a Crimean Tatar battalion set up on behalf of NATO. Mustafa Dzhemilev and his company have been profiting from Crimean Tatars for years. While the Crimean Tatar community was living in misery, they got rich, including through fraudulent arrangements with Turkey. Mustafa Dzhemilev being an uneducated man evolved into a man owning luxury cars, villas and flats in Kiev, Istanbul, Cyprus and London as well as companies doing business with Europe, Canada and the United States. He made over most of them with other people: his wife, his friends, his drivers. Today he has set up coordination offices outside the Turkish association. He is looking for ways to turn the war into a spoilsport by supplying arms and aid to the Ukrainian

army through them. It is time to put an end to these structures enriching themselves at the expense of the suffering and despair of Crimean Tatars. In this regard the Turkish state should also take responsibility and set up a team to investigate the fate of the aid and money sent. Nothing else should be a secret. Those who have plundered the values of Turkish and Crimean Tatar society for years must be publicly brought to responsibility.

[...]

Exhibit AC

Politnavigator.net, *Erdogan is suggested to initiate an investigation into the theft of Turkish money by the Mejlis leadership* (7 February 2023)

(translation)

Translation

Politnavigator.net, *Erdogan is suggested to initiate an investigation into the theft of Turkish money by the Mejlis leadership (7 February 2023)*, available at: <https://www.politnavigator.net/ehrdoganu-predlagayut-iniciirovat-rassledovanie-vorovstva-tureckikh-deneg-medzhlisovskojj-verkhushkojj.html>.

By Lyubov Smirnova

Turkey should make a narrow search into the loss of funds allocated for construction of a hospital for Crimean Tatars and multi-storey buildings. The money vanished without a trace in business structures linked with Mustafa Dzhemilev, ex-Chairman of the Mejlis of the Crimean Tatar people banned in the Russian Federation for extremism.

This is what Unver Sel, the head of the Federation of Crimean Tatar Cultural Communities of Turkey, told during a live show at *Crimea24*, as reported by a *PolitNavigator* correspondent.



“Crimean Tatars began returning to their homeland in Crimea in 1989. The Soviet Union collapsed two years later, and the Crimean peninsula became part of the already independent Ukraine; since that time, Turkey’s aid to our compatriots in Crimea increased dramatically,” Mr. Sel said.

He clarified that “a significant part of the aid was provided by the Turkish State through the Crimea Foundation controlled by Mustafa Dzhemilev”.

“However, many actions allegedly taken for the benefit of the Crimean Tatar people have been unsuccessful. During the presidency of Suleyman Demirel, Turkey sent humanitarian aid to Crimea to build a hospital, but it was never built.

Housing was a major problem for Crimean Tatars. To cope with it, Turkey sent aid to Crimea, but no houses were built, and the money vanished.

Over the years, most of the humanitarian aid that had been collected was distributed among Mustafa Dzhemilev's cronies, and those who sent aid saw most of it offered in markets and sold by wholesalers".

The Zaporozhye and Kherson Regions that have now separated from Ukraine were historically the land of the Crimean Khanate inhabited by the Crimean Tatar diaspora, Mr. Sel recalled.

In 2014, these residents moved to Crimea, while the houses, fields, hotels, factories and restaurants that they left behind have been looted by members of the Crimean Tatar battalion set up on behalf of the Armed Forces of Ukraine.

"Mustafa Dzhemilev and his gang have been profiting from the Crimean Tatars for years while the Crimean Tatar community lived in misery, they got rich on fraudulent transactions with Turkey. Mustafa Dzhemilev, for his part, has turned from a man who had no education into an owner of luxury cars, villas and apartments in Kiev, Istanbul, Cyprus and London, as well as companies doing business in Europe, Canada and the USA. He registered most of them in other people's names such as his wife's, friends', and drivers'," noted Mr. Sel. "Now, he has set up coordination offices in Turkey, looking for ways to turn war into profit through them by supplying arms and aid to the Ukrainian Army.

It is time to put an end to those structures making money at the expense of Crimean Tatars' suffering and despair. In this vein, the Turkish State should also put together a team to investigate what has become of the aid that has been provided and the money that has been sent. Nothing should be kept secret anymore. Those who have been plundering the riches of the Turkish and Crimean Tatar peoples for years should be held accountable to the public."

Exhibit AD

RIA Novosti (Crimea), *How Crimea Was Tempered: Five Blockades in the Peninsula's Modern History* (28 February 2019)

(translation)

Translation

RIA Novosti (Crimea), *How Crimea Was Tempered: Five Blockades in the Peninsula's Modern History* (28 February 2019), available at: <https://crimea.ria.ru/20190228/1116152860.html>.

How Crimea Was Tempered: Five Blockades in the Peninsula's Modern History



07:24 28.02.2019

© RIA Novosti. Andrei Stenin

Evgeniya Martynenko, RIA Novosti Crimea correspondent

Day by day Crimea is approaching a landmark date - the first five-year anniversary of the Russian peninsula's recent history. In these February-March days, Crimea, like the rest of the country, is remembering the events of 2014, when Crimeans decided to reunite with Russia.

Over these years, the peninsula has gone through a difficult path of establishing the region as a full-fledged constituent entity of the Russian Federation, facing Ukrainian provocations time and again. In particular,

With Russia's help, the peninsula went through five blockades imposed by Ukraine: economic, water, transport, energy and informational. On the eve of the anniversary of reunification with Russia, RIA Novosti Crimea recalls what it was like.

It all started with the water

Since Crimea became part of Russia and a new government was established in Ukraine, Kiev has repeatedly threatened to blockade its border with the peninsula. Kiev has had all the

"trump cards" for this, as the peninsula, which is connected by land only with Ukraine, received resources and most goods from there.

The "provocative debut" was not long in coming - immediately after the peninsula became part of Russia, a water blockade was imposed.

Until 2014, Ukraine provided up to 85% of Crimea's fresh water needs through the North Crimean canal from the Dnepr River, this water was used to irrigate farmland. Approximately one third of the Kherson region was fed with water through the same canal. After the events of the "Crimean spring", the Ukrainian part of the waterway was taken under enhanced protection and the Administration of the North Crimean canal in Tavriysk (Khersonskaya Oblast - ed.) was instructed to close the flood-gates on the barrier near the border with Crimea. The inflow of water to the peninsula has practically stopped.

In May 2014, information emerged that a dam was being constructed on the territory of Kherson Oblast approximately 15 km from the border with Crimea. After the completion of this facility, "excess water" was discharged into the Black Sea gulf through one of the drains, drying up the channel of the North Crimean canal. A cofferdam was then built there with sluices and water metering structure in case of water supply to Crimea after conclusion of the relevant agreement. However, there were no official negotiations on this issue - Crimea took all sorts of measures on its own to provide itself with water and no longer depend on



Ukraine in this matter.

© RIA Novosti . Konstantin Chalabov

"The problem of sustainable water supply to the peninsula has always been there, the issue of drinking water quality was relevant many years ago. And the closure of the North Crimean canal directed us to solve the issue of sustainable water supply to Crimea, now we are successfully dealing with these issues," Sergey Tsekov, a member of the Federation Council Committee on International Affairs, said in a commentary to RIA Novosti Crimea.

In the absence of water from the Dnepr River, the peninsula's agriculture suffered significant losses: the area of irrigated land decreased several times, the agricultural sector switched to drip irrigation and cultivation of drought-resistant crops, and the cultivation of some crops had to be abandoned altogether.

A number of projects have been implemented to supply water to consumers in Crimea. For example, in 2014, hydraulic engineering structures were built to fill the North Crimean canal with water from the Belogorsk and Taigan reservoirs along the Biyuk-Karasu River. Thanks to this engineering solution, residents of eastern Crimea, where the water supply situation was the most difficult, began to receive water.

In addition, construction of three water intakes in Nizhnegorsk and Dzhankoy districts - Novogrigoryevsky, Nezhytsky and Prostornensky - started in October 2014. The project, with a total cost of 1.2 billion roubles, envisaged drilling of 12 artesian wells from 110 to 180 metres deep at each of the water intakes. The water wells were constructed within two years, and this allowed to supply drinking water to about 200 thousand residents of the Eastern



Crimea.

© Photo: Information Policy Department of the Ministry of Information of the Republic of Crimea

As part of the implementation of priority measures for water supply 30 wells were drilled, repaired and equipped in 30 localities of the Republic. In a number of Crimean villages, where water was supplied by the hour for 15-20 years, a round-the-clock water supply has been established.

The ordeal of water scarcity did not break Crimea; on the contrary, the region was able to promptly begin to meet the challenges faced by the newly-formed Russian region.

"The water blockade of Crimea did not lead to the disastrous results our enemies hoped for. The water needs of the peninsula's population and guests for domestic and drinking needs have been fully met," stressed Sergey Aksenov, head of the Republic, during his annual report

on the Council of Ministers' activities in 2018. - In five years, more than 173 million cubic metres of water have been supplied to the region's reservoirs".



The food supply was cut off

© RIA Novosti . Denis Petrov

The water blockade has not led to the desired effect for Ukraine and it has made its next move. This time, Kiev appears to have "checkmated" the peninsula's food security.

On September 8, 2015, deputies of the Verkhovna Rada and leaders of the Russian-banned organisation "Mejlis of the Crimean Tatar people"* Mustafa Dzhemilev and Refat Chubarov said.

it was necessary to stop trade turnover with the peninsula. Dzhemilev announced preparations for a so-called "peaceful transport blockade" on the border between Kherson Region and Crimea. All Ukrainian patriots were urged to join the action. A week later, Russian-banned extremist organisation Right Sector* announced its intention to join the upcoming blockade. Later, the Kherson police said that they were preparing to ensure law and order at the blockade and to provide the protesters with everything they needed.

While some officials from the rostrum in Kiev publicly "pitied" Crimeans and called for help to overcome the difficulties of the so-called "occupation", others tried in every way to isolate the peninsula from the outside world. Considering that Ukrainian goods were still actively supplied to Crimea at that time, the radicals took a drastic decision - to cut off the supply of products to the peninsula. The Russian side responded immediately, saying that the

peninsula was not afraid of these threats and that only the Ukrainians themselves would be made worse off by the organisers.

"You didn't have to be a very smart state official to go along with it. In fact, they did not impose food blockade on us but on their producers. Everyone who grew their own vegetables, fruits and produced their own goods - they were simply deprived of the market. For us, however, this was an incentive to quickly replace and increase the productivity of our Crimean market," Senator Sergey Tsekov recalled.

However, Kiev has not heard the call for common sense . At noon on 20 September 2015, concrete checkpoints and a tent camp were set up at the Chongar checkpoint. Thus began the trade blockade of the peninsula. The following trucks into Crimea were blocked by radical Crimean Tatar representatives, who were joined by civic activists and members of volunteer battalions. All this with the tacit consent of the Ukrainian police.

Later, roads to the Chaplynka and Kalanchak checkpoints were blocked. The blockade only applied to trucks carrying goods to and from Crimea, which led to repeated clashes between truckers and activists. Personal vehicles were initially allowed through the border unimpeded, but later Right Sector members* began to inspect cars as well, checking the documents of people crossing the border and checking them in the database of the scandalous website "Mirotvorets".

In the first hours after the blockade began, trucks began to pile up at the checkpoints, and queues numbered in the hundreds. The transporters tried for some time to talk sense into the radicals, but they remained adamant that Ukraine would not feed and support the "traitors of the motherland". For his part, Petr Poroshenko said that the rally was held to "restore state sovereignty as soon as possible over Crimea". And the head of the Mejlis*, Refat Chubarov, stressed that the main goal of this blockade was to demonstrate "to the



whole world that Russia must pay for the upkeep of Crimea until it withdraws from there"

However, Kiev's calculations did not come true. Firstly, the republic's counters were already full of Russian goods, and there was plenty to choose from. Secondly, during the first days of the trade blockade more than 30 retail chains of the peninsula and the government of Crimea signed a memorandum on limitation of the prices. In addition, The Russian Federation did its best to provide the "cut off" peninsula with everything necessary through the Kerch ferry crossing. Despite the calls of the official authorities to boycott the region, a number of Ukrainian manufacturers tried their best to maintain trade relations with the peninsula and transported products via detour routes - by ships across the sea and through the Russian territory.

Experts believe the economic blockade was actually an attempt to control trade with Crimea where wages, pensions and effective demand increased sharply during the year. However, the attempt failed - the peninsula did not experience any deficit, continued to actively integrate into Russia, while Ukraine was left with ruins, as it was Ukrainian producers who suffered enormous losses from the blockade. After the first setback, Kiev played the second "card" - at the end of September, the Verkhovna Rada registered a draft law on the complete blockade of Crimea and Donbass. The document regulated the complete closure of railway, freight and bus traffic to these territories. This marked the beginning of the next blockade of the peninsula - the transport blockade.



No planes are flying and no trains are travelling

© AP Photo/Sergei Grits

In fact, Crimea saw the beginnings of a transport blockade back in late 2014, when Ukraine unilaterally halted train traffic across the border with the Russian peninsula. Passenger and freight trains travelling to Crimea ended their route in Kherson Region before reaching the border. The Ukrainian railway transport administration, "Ukrzaliznytsya", explained that it was impossible to ensure passenger safety.

Direct sea and air links between Crimea and abroad were interrupted. Crimeans with Russian passports began to fly abroad from mainland Russian airports. The carriers and owners of bus stations also received letters demanding that they stop selling tickets and carrying passengers on bus routes connecting the Ukrainian mainland with the territory of Crimea. The official bus service to the peninsula has also been terminated.

However, even here, the complete isolation that the Ukrainian side still hoped for did not happen. It was possible to reach Crimea from the neighbouring country, albeit with transfers: by driving through the territory of Ukraine to the border settlements, then by car to the checkpoint, then on foot through the border strip to the checkpoint on the Russian side and from there by any means of transportation through the towns of the peninsula. Later, a more convenient way of crossing the border was found - those who wished to do so could get to Crimea by private transport or use the services of enterprising carriers who drove people in their cars or minibuses. This service quickly became popular among residents of both countries as they had family and friends on both sides of the border. Taxi drivers are still making good money from the Crimea transport blockade to this day - they quickly 'took over' the service of transporting passengers across the border. So this blockade, too, was essentially ineffective in Kiev's attempt to cut off all ties with the peninsula.



Six months of blackout

© REUTERS/ Stringer

The peninsula's third and most severe blockade in a year began in November 2015. At that time, Crimea faced a phenomenon unprecedented in modern history: a group of extremists supported by the Ukrainian authorities blew up electricity transmission towers in the Kherson region and left the entire peninsula without electricity.

As the energy system of Crimea was in deficit in Ukrainian times and the main volume of consumed electricity was covered by overflows from other regions of Ukraine through four high-voltage power lines "Melitopol - Dzhankoy", "Kakhovka - Dzhankoy", "Kakhovka - Ostrovskoe", "Kakhovka - Titan", the peninsula was energy dependent on the neighbouring state. Crimea's own generation was no more than 20-25%, which radical political circles in Ukraine did not fail to take advantage of.

On the night of October 6, 2015, unknown persons damaged a high-voltage pole of one of the transmission lines that supplied electricity to Crimea. At first, the "Right Sector"* denied involvement in the incident and called it "a provocation aimed at discrediting the action to blockade the peninsula". However, the organisation later stood by the supporters of the Crimean Tatar Mejlis*, which is now banned in Russia, who prevented "Dneprenergo" specialists from repairing the power line tower.

In November, radical supporters from various regions of the neighbouring state began to flock to Kherson Region on the border with Crimea. The "Right Sector"* said that it had "received operational information about possible provocations due to the difficult internal situation" in Ukraine. On the night of 20 November, a group of Ukrainian radicals blew up the supports of the Melitopol-Dzhankoy high-voltage power transmission line in Kherson Region near the border with the peninsula. The Kakhovka-Titan and Melitopol-Dzhankoy lines supplying Crimea are out of order. To clarify the circumstances, the Russian Energy Ministry set up an operational headquarters to supply power to Crimea.

A day later, "Ukrenergo" said that during an inspection of the power lines, experts also found damage on the two remaining lines: a crack in the reinforced concrete pole of the Kakhovka-Ostrovskoe line and damage to the metal structure on the "Kakhovka - Dzhankoy" line. The pylons were surrounded by activists of the so-called Crimean blockade who oppose electricity supplies to Crimea. They blocked the access of repair teams to the damaged power lines, which led to clashes with Ukrainian security forces who arrived on the scene.

And the next night, the peninsula was completely plunged into darkness - on November 22, all Crimean settlements went out of power. This time, all four power lines on the border with the peninsula were blown up, leaving nearly 2 million people without power supply. Lenur Islyamov, a former Moscow businessman who is now the leader of an armed Ukrainian militant extremist battalion and one of the most ardent supporters of the return of Crimea to Ukrainian control, was one of the organisers and sponsors of the attack. The Crimean and Sevastopol authorities introduced a state of emergency. All social facilities on the peninsula immediately switched to reserve power sources, and hundreds of additional diesel generator sets and fuel were transferred to Crimea from all regions of Russia.

The Ukrainian authorities were in no hurry to restore power supply and the peninsula's own generation facilities could not cover the region's needs, so they had to accelerate the commissioning of the power bridge, which had been under construction since April 2015 to connect Crimea to the Unified Energy System of Russia.

The first line was launched in early December, providing Crimeans with 200 MW of Russian electricity. The second was commissioned two weeks later, on December 15, and the third in April 2016. On 11 May 2016, the energy bridge started operating at full capacity - in a video conference, President Vladimir Putin launched the last, fourth string of the energy bridge from Krasnodar Region.

On 18 May, the state of emergency in Crimea was lifted. After Crimea, the state of emergency was also lifted in the hero city of Sevastopol.

The blackout in Crimea, which was organised by Ukrainian extremists and radicals, lasted almost six months. The Crimean prosecutor's office opened a criminal case against its organisers, and the damage caused by their actions was estimated at about 2.5 billion roubles. These six months were a serious test for Crimeans, but the peninsula's residents withstood all the difficulties of the energy shortage with honour.



International recognition in the sanctions regime

© RIA Novosti . Vasiliy Batanov

After the reunification of the peninsula with the Russian Federation, the European and US authorities did everything possible to isolate it from the rest of the world. Thus, a large-scale information and political blockade was imposed on the newly-formed entities of Russia - Crimea and Sevastopol.

International media reported with enviable consistency on the "horrors" of the "occupied Crimea". A number of countries announced an international boycott of the Russian peninsula, securing their decision with sanctions and all kinds of restrictions.

However, despite the large-scale information blockade, some European politicians decided to personally check the situation in Crimea and visited the Russian entity. Some of them officially, some with a private visit, and some as part of large delegations.

In the past two years alone, about 100 official foreign delegations have visited the Republic, including from Germany, France, Norway, Bulgaria, the USA and other countries. And all the foreigners have been pleased with the visit, admitting that there is peace and order in the

region. After the visits, they admitted that the picture painted in many Western media of what is happening in Crimea is far from reality, and each visit by foreign guests makes a significant contribution to breaking the information blockade of the peninsula.

The number of politicians openly supporting the reunification of the peninsula with the Russian Federation in Europe and other countries is increasing year by year. More and more often, statements about the recognition of the Russian status of Crimea are heard not from members of the public, but from current officials who hold serious official positions in their states and members of national and European parliaments. This demonstrates that European countries are gradually realising the need to recognise the peninsula as part of Russia and to lift economic sanctions that are harmful to everyone.



© RIA Novosti . Aleksandr Polegenko

"In five years, it has become obvious to all sane people that attempts to isolate Crimea have completely failed. Much credit is due to the people's diplomacy. Last year, the leadership of the Council of Ministers paid official visits to Syria, China, Armenia, South Ossetia, Abkhazia, Laos and the Donetsk People's Republic. Crimea hosted 25 international events last year alone, - "Sergey Aksyonov said in his annual report to the State Council. - In just five years, representatives of at least half of the world's countries have visited Russia's Crimea, and if private visits are taken into account, of course, even more".

"The biggest blockade Crimea faced was when it was part of Ukraine. Everything was being destroyed then - the economy, infrastructure, agriculture. And all this was happening against the backdrop of creeping Ukrainianisation," Senator from the Republic Sergey Tsekov told RIA Novosti Crimea. - All of this combined has allowed us to successfully overcome the blockades that Ukraine put on us after reunification with the Russian Federation. So much so that we did not perceive Ukraine as our motherland, we considered it more as a stepmother, that when it arranged all these blockades for us, we coped with them very

successfully. And they allowed us to quickly solve all the problems that Crimea needed to solve in principle".

**Organisations banned in Russia*

Exhibit AE

RBC, *Crimea's Shutdown: The Threat of an Energy Blockade to the Republic*
(22 November 2015)

(translation)

Translation

RBC, *Crimea's Shutdown: The Threat of an Energy Blockade to the Republic* (22 November 2015), available at: <https://www.rbc.ru/society/22/11/2015/5651b8cf9a79474f3a9e0f59>.

Crimea's Shutdown: The Threat of an Energy Blockade to the Republic

(Photo: Alexei Pavlishak/TASS)

The power supply to Crimea from Ukraine has been cut off due to the undermining of power transmission towers by unknown assailants. It will take up to two days to restore it if Crimean blockade activists do not obstruct repairs



Outdoor concession stand in one of the walking tunnels in Stroganovka village, Simferopol district

Shutdown in two days

Crimea's maximum demand for electricity is 1,200 MW per day. About 30% of this capacity is provided by its own generation (thermal, solar, and wind power plants), and from 500 to 900 MW, depending on the time of the day, is delivered by transmission lines from Ukraine. Energy purchases there, as well as from Crimean producers, are handled by the Settlement Implementation Centre, a subsidiary of Russia's "Inter RAO". It was allocated a budget subsidy of 10 billion roubles for 2015, of which 8.8 billion had been spent as of 1 November.

The scheme suffered its first failure on Friday. On the morning of November 20, the poles of two power transmission lines (PTL) were blown up by unknown assailants: Melitopol - Dzhankoy (330KW) and Kakhovskaya - Titan (220KW). The remaining two transmission lines took over the supply of electricity to the Crimean peninsula at this point: Kakhovskaya-Ostrovskaya (330KW) and Kakhovskaya-Dzhankoy (330KW). The second failure occurred on Saturday at 23:20 (00:20 Moscow time on Sunday), when "Ukrenergo", the Ukrainian energy company, received a signal that these two lines were also down.

The Crimean energy system

© RBC, 22 November 2015 The source "Ukrenergo" The map: openstreetmap.org

On Sunday morning, the Ukrainian Energy Ministry reported that electricity supplies to consumers



on the Crimean peninsula had been completely cut off. In addition, according to its estimates, there is a risk of disconnection of up to 40 percent of consumers in Kherson and Nikolaev regions. "Household consumers of the Republic of Crimea and the city of Sevastopol (about 1.9 million people) were left without electricity supply. The capacity of the disconnected consumers is 673 MW," the Russian Energy Ministry reported on Sunday.

No one has claimed responsibility for undermining the pylons. In late September, one of the initiators of the civil blockade of Crimea from the Ukrainian side, people’s deputy of Verkhovna Rada Refat Chubarov, promised to de-energise the peninsula. Since 20 September, Crimean Tatar activists, supported by the representatives of the "Automaidan" movement, "Right Sector" (an organisation banned in Russia), and other Ukrainian organisations have been blocking the movement of Ukrainian commercial vehicles into the peninsula.

One of the leaders of the Crimean Tatars, people’s deputy Refat Chubarov, wrote in his Facebook account on Saturday that participants in the Civil Blockade of Crimea demanded that the authorities take effective measures aimed at protecting the rights of Ukrainian citizens "living in the temporarily occupied territory of Crimea". "As such a measure... appears to be the termination/restriction of electricity supplies from mainland Ukraine to occupied Crimea," Chubarov wrote. According to "Interfax-Ukraine" news agency, activists of the Civil Blockade of Crimea movement posted photos

of the fallen pylons on social media on Sunday morning, but did not claim any involvement in the incident, suggesting that it was "the work of saboteurs".

In an interview with "Interfax-Ukraine", one of the leaders of the Crimean Tatar movement, people's deputy Mustafa Dzhemilev, said that on Saturday he discussed with Ukrainian President Petr Poroshenko "the incident between participants in the "blockade of Crimea" and law enforcers". The latter demanded that energy workers be allowed to access the damaged power lines in order to ground them, but blockade activists did not allow the repairmen to the pylons.

President Poroshenko and Prime Minister Yatsenyuk have not yet commented on the situation. Internal Affairs Minister's adviser and people's deputy Anton Gerashchenko said that he believed it was necessary to discuss the energy blockade of Crimea in parliament, but so far there have been no official statements on the issue.

The Ukrainian side did not give an exact deadline for eliminating the accident and restoring power supply on Sunday. The management of "Ukrenergo" said that it had started negotiations with the participants in the Crimean energy blockade "on the possibility of carrying out repair works". Dmitriy Marunych, co-chairman of the Ukrainian Energy Strategy Foundation, told RBC that two days would be enough to repair the blown-up power line poles if the activists do not block the repairs. According to Marunych, the poles of the power lines, which supply electricity to Crimea, will be restored in any case, as they also supply Ukrainian regions.

According to "Ukrenergo", in order for the situation in Crimea to normalise, it is enough to restore one of the transmission lines that feeds Crimea with a capacity of 330 kilowatts; then the peninsula will be able to receive 500-550 megawatts per day through it. For now, the Ukrainian energy sector has promised to notify the buyer of electricity, a subsidiary of "Inter RAO", about the force majeure.

Crimean Deputy Energy Minister Evgeniy Demin told "RIA Novosti" that fuel reserves for mobile power plants in Crimea will last for 25 days. In 2014, Russian Emergencies Minister Vladimir Puchkov reported that his ministry had sent about 1,400 mobile stations to the peninsula. In addition, nine large mobile gas turbine power plants (GTPPs) with a total capacity of 241 MW have been sent to Crimea from Sochi. "Currently, all reserve power sources are engaged in Crimea, all social infrastructure is connected, but it is impossible to increase the number of mobile stations and diesel generators - the peninsula's entire demand cannot be covered this way," a source in the republic's Energy Ministry told RBC.

No boilers and no fridge

The peninsula authorities have decided that street lighting will not work during dark hours "for the sake of economy". Crimean head Sergey Aksyonov also warned the region's residents about possible disruptions in the work of mobile communications and the Internet. Simferopol authorities said, that rolling blackouts in the city might last for up to nine hours. The Crimean capital has also turned off heating, however city head Gennadiy Bakharev said that this was due to the warm weather: the city recorded a temperature of plus 18 degrees on Sunday.

Crimean Industrial Policy Minister Andrei Skrynnik said Sunday afternoon that "according to operational monitoring, most retail businesses as well as retail markets continue to operate and have sufficient stock to meet consumer demand in full, despite restrictions on electricity supplies." Natalya Kashcheyeva, a spokeswoman for the agency, later noted that many retailers "are finding a way out by connecting to backup power sources".

The association "Assistance to Trade of Crimea" estimates are more pessimistic: according to its data, more than half of the chain shops in Crimea - at least 50 outlets - are without electricity. "Of these,

only 5% are now operating on backup power supplies," says association chairman Sergei Makeyev. - But it is too early to talk about any serious losses for retailers: everyone has freezers, so that everyone can make it through the day. The general mood among the population is calm, there is no panic, no one is asking to go back to Ukraine. We do not notice an increase in demand for any goods".

Of the 13 shops of the "Yabloko" grocery chain, only two in Simferopol are not operating at the moment, director of the chain, Tatyana Pikalova, told RBC. "Two shops - one in Kerch and one in Evpatoria - are running on diesel. In Simferopol we have eight shops, only two are not working because the others are in areas where there is electricity," she said. - We have stored all the goods in freezers and will be able to keep them cold for the next eight to nine hours," she said. Authorities have kept us informed of the current situation. We are promised that within today the situation will improve and a schedule of rolling blackouts will be drawn up."

"At night we had power outages, now everything is working," Yanina Pavlenko, general director of Massandra winery, told RBC. - We will adjust our work to the blackout schedule. Ukraine has cut off our electricity supply before, so we are used to it".

Cable from Russia

The only way to make Crimea independent of Ukrainian energy supplies is to connect the peninsula to the Russian energy system. It was reported in July that the Energy Ministry had signed a state contract on the construction of a power bridge to Crimea. The total cost of the project (it includes four cable lines and the construction of two power plants in Crimea) exceeds 47 billion roubles, including value added tax. In 2015, 9.5 billion roubles was allocated to the project. The client is the Russian Energy Agency (part of the Ministry of Energy), and the main contractor is the "Engineering and Construction Management Centre of the Unified Energy System", a subsidiary of the Federal Grid Company.

How the energy bridge works

Four cable lines with a length of 13.5 km each will be laid on the bottom of the Sea of Azov. The cables will be laid at a depth of 8-18 m. The total area of the corridor in the water area of the strait will be 202.5 ha.

At the same time, the United Power Grids of the South will be prepared to serve the Crimean energy system. It is a question of building 500KW high-voltage lines Rostovskaya-Andreyevskaya-Vysheblyevskaya (Taman) and Kubanskaya-Vysheblyevskaya. The 500KW Kubanskaya substation will also be expanded and the 500KW Vysheblyevskaya substation will be built.

The construction of the energy bridge is being carried out in two stages. The first phase of the work should be completed by early 2016, Crimean Deputy Energy Minister Evgeniy Demin told reporters in October, and it will provide the peninsula with 300-400 MW of energy. "The cable for the power bridge has almost been laid, but in order to launch it, the infrastructure around it is still needed, so the urgent commissioning is out of the question now," a source close to the Ministry of Energy familiar with the details of the project told RBC.

The second stage, as the official said in an interview with kerch.com.ru a month ago, will be completed in the summer of 2016 (the deadline may be pushed back to 2017. - RBC) and will make it possible to supply a total of 600-800 MW to Crimea. The additional generation is to be provided by Rostov Atomic Power Station. Once the two new thermal power plants with a total capacity of about 900 MW start operating (the first stage is scheduled for 2017), the peninsula will become energy-independent from Ukraine.

With the participation of Polina Khimshiashvili

Exhibit AF

Odessa Crisis Media Center, *Lenur Islyamov: We Will Return Crimea Within 2016*
(25 December 2015)

(translation)

Translation

Odessa Crisis Media Center, *Lenur Islyamov: We Will Return Crimea Within 2016* (25 December 2015), available at: <https://web.archive.org/web/20160207145939/http://www.odcrisis.org/lenur-islyamov2/>.

**Lenur Islyamov: We Will Return Crimea Within 2016**

This entry was made in News on 25 December 2015 by Alena Balaba, our author, and tagged as “Odessa”, “Noman Chelebzhikhan Battalion”, “blockade of Crimea”, “civil blockade of Crimea”, “Krim”, “Crimea”, “Lenur Islyamov”, “Naval blockade of Crimea”, “Odessa”, “customs”, “ports”, “Chonhar” and “energy blockade”.

A plan to return the occupied and annexed Crimea is ready; a food blockade is successfully maintained, the peninsula receives electricity in a metered manner, a volunteer battalion is being formed in the border zone, and activists plan to impose a naval blockade in the near future. Read the details in our publication.

The blockade of the occupied and annexed peninsula began as early as on the 20th of September, when Crimean Tatars, who are persecuted in every possible way by Russian occupiers, blocked the roads leading to the peninsula, preventing trucks carrying food from passing. Mass media were full of various information with assessments and criticism of the civil blockade of the Crimea imposed by activists. Soon Azov and Right Sector members joined Crimean Tatars in their efforts to maintain the blockade, with the Armed Forces of Ukraine and Ukrainian border guards also supporting the blockade. On the 21st of November, unknown persons blew up the four power line pylons supplying electricity to the occupied peninsula in Chaplynka, Kherson Region, resulting in a long-time blackout. Following their old tradition, Russian propagandists began to threaten and blackmail the activists, launching various fake news. At the moment, one power line to the Crimea has been restored, and the peninsula still receives electricity on an hourly basis. The food blockade is still maintained, and, according to Lenur Islyamov, the commander of the “Civil Blockade of the Crimea” movement’s headquarters, the invaders should expect a naval blockade to begin in January. Odessa Crisis Media Center’s reporters visited the site and took a detailed interview with Lenur Islyamov.

“A lot of various information is circulating, including in Ukrainian media, about the blockade of the Crimea and who benefits from it. So we want you to tell us what is going on here, what are your plans, and what you are going to do next”.

“We started the blockade consisting of three stages: the first one is a goods blockade, the second one is an electricity blockade, and the third one is a naval blockade. There was also an idea of one small blockade called the “network blockade”, but the Mejlis has not yet given its go-ahead for it because the whole Crimea will then lose the Internet connectivity. As a matter of fact, we

do not insist on it. On the 15th of December, the Cabinet of Ministers passed a resolution officially prohibiting everything from being imported into the Crimea beginning from 15 January 2016. We gave 30 days for it to become effective. The power line pylons are the next target. One 220-V line of the four disabled lines is now turned on again. We have to disable it on the 31st of December. If it is not turned off, then we will move away, removing our roadblocks everywhere, that is, the electricity should not enter the Crimea beginning from the 1st of January. We left this line for our legislators, members of the Verkhovna Rada, because we have no hope for the government. As regards the naval blockade, we want to make it very painful for the Russians. The goods blockade is transforming into civil associations that will be located in the coastal territory. We are currently forming a new volunteer battalion named after Noman Çelebicihan. We should wait to receive a military unit number to be assigned to it, but we already receive volunteer assistance as a battalion. On Friday, we will receive the first batch of Turkish military uniforms. While the Ukrainian Defence Ministry is still only fidgeting, the Turkish Defence Ministry has already begun to support us. We will get 250 sets of uniforms and boots. As soon as we get a military unit number, hopefully, by the 15th of January or so, the World Congress of Crimean Tatars will be held on Chonhar, and its executive committee will be here. All Crimean Tatars from all over the world – i.e., from America, Canada, Poland, Romania, and Turkey, about 43 countries in total, will come here, and all of them will be here, in our headquarters on Chonhar”.

“Please tell me more about your Battalion”.

“The Battalion will consist of 560 persons. They will deal with the tasks set by the General Staff. But their main task will be to protect the Crimean border inside the Crimea. We will make the Crimea closer as soon as possible. The mission of this Battalion is to strike in a way only we know. We know all trails and springs in the Crimea. Crimean Tatars in the Crimea are expected to bring the liberation of the peninsula closer. We are told, ‘wait three to four years at the international level’, but we want this to happen in one year. In three to four years, Russia will be completely devastated. We want that to happen in one year”.

“How do you plan to impose a naval blockade?”

“Ships with smuggled goods are leaving Odessa. They go to the 12-mile zone and turn off their GPS navigators. Ships from Sevastopol approach them and take their goods. That is one option. The other one is that the navigator on the ship is turned off, the ship moves on, goes into the port of Sevastopol, unload its freight, goes on the same route, turns on its navigator as if it was broken, and enters Skadovsk. And then it goes to Istanbul. Odessa customs authorities and SSU know about it. Unfortunately, people are ready to be annexed and raise Russian flags. We need to return the Ukrainian cities and towns to Ukraine”.

“How are locals responding to the blockade?”

“At first, they were scared. Russian TV channels are broadcast here, there are seven Crimean radio stations talking about the junta, Tatar-Banderites and so on. The Ukrainian information field is not protected. When we drive through the Kherson Region, they call us “Banderites”. But this is half the trouble. People do not understand what will happen to them if Russia comes here. That Russia they see on TV has long gone”.

“Please tell me, do Ukrainian border guards know about the sea smuggling?”

“I do not want to blame anyone, I just know that is happening. But I cannot figure out how all those services can be unaware of the smuggling. But this is not an easy question. We have imposed a civilian blockade of the Crimea, but on what ground border guards should detain those vessels? Even here. We have set up roadblocks illegally. Someone can speed up and ram through them. And what do we say? There is Law No. 4032, no one has abolished it. You can drive to the Crimea and bring, say, ice cream from Lviv. The same case is with the ports of the Greater Odessa; there is no blockade from Ukraine, the resolution will only begin to work from the 15th of January. Recently, one lawyer went from Mariupol, carrying six bottles of champagne to the Crimea. I told him, “You are from Mariupol, you were attacked, shelled, and you are carrying champagne to the Crimea”. He replied, “Yes, I am, I don’t care that they fired Mariupol, my wife lives there”. We have a tricolour kimono hanging in here. It was Kharkiv women who carried a whole pile of those kimonos. They are very stubborn. They just say, “That’s how we want it”. The local councils do not stand up for the anthem of Ukraine here”.

“Okay, but how can this naval blockade be implemented?”

“If there were more patriots in Odessa, it would be possible to attack ships with small boats when they allegedly go to Skadovsk while really carrying goods to the Crimea. Information on their exits is available. The neutral waters are open to any ships. No fleet is entitled to operate there. The 12-mile zone near the Crimea is also occupied, so this could be done. But we will use this method when we have already tried all other ones. We have more interesting methods to prevent ships from moving further”.

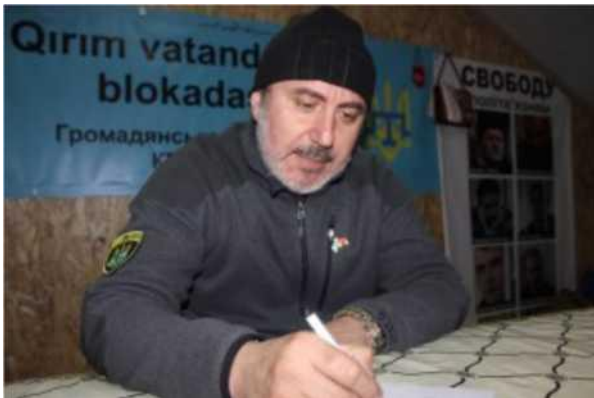


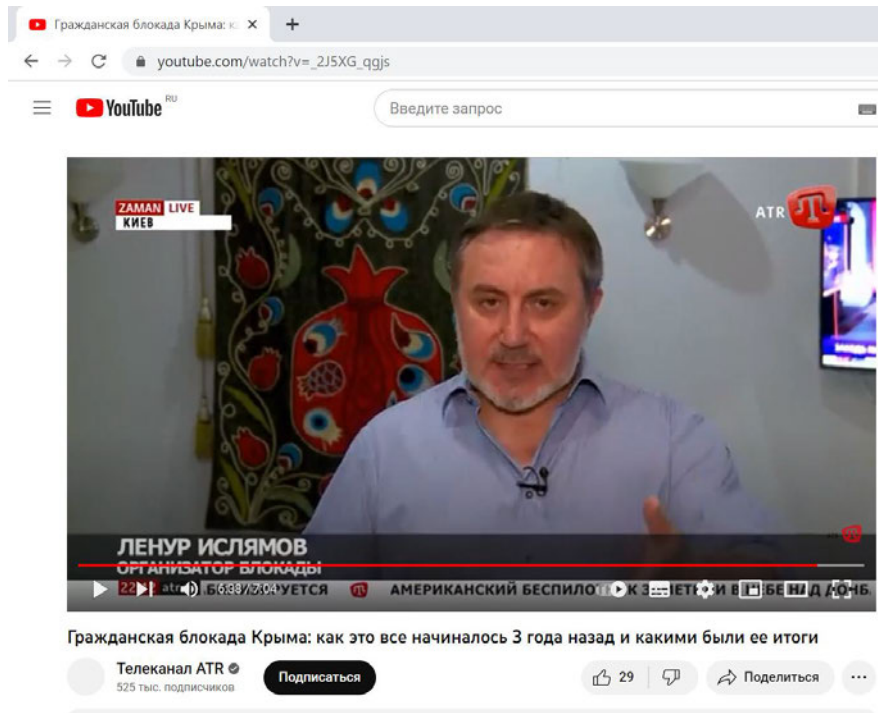
Exhibit AG

YouTube, *ATR TV, The Civil Blockade of Crimea: How it All Started 3 Years Ago and What the Outcome Was* (21 September 2018)

(translation)

Translation

YouTube, ATR TV, *The civil blockade of Crimea: how it all started 3 years ago and what the outcome was* (21 September 2018), available at: https://www.youtube.com/watch?v=_2J5XG_qgjs



[00:00]

[Host]: ‘Stop feeding the occupier!’ - This was the slogan with which the trade blockade of Crimea began three years ago on 20 September 2015. It was initiated by the Mejlis. Crimean Tatar leaders decided to stop trade with the enemy. They allowed only cars to enter the peninsula from Crimea, completely blocking truck traffic. How did it all begin? And what were the consequences of this action? My colleagues will tell you.

[00:28]

[Voice-over]: On 20 September 2015, at noon sharp, civic activists block 3 checkpoints into occupied Crimea: Chongar, Kalanchak and Cheplinka. Anti-vehicle hedges and tyres are deployed at the administrative border of mainland Ukraine in occupied Crimea. People with Ukrainian and Crimean Tatar flags walk continuously along the pedestrian crossing. From now on, it is only possible to get in and out of the peninsula by car or on foot. Trucks carrying goods to the peninsula queue up for kilometres. With some drivers, emotions fly high.

[01:00]

[Driver]: Where should I go? Am I going to stick here, live here? I need to go to Genichesk. I live there. Am I driving on my own?

[01:08]

[Refat Chubarov]: I don't want you to feed those bandits who kill our people. That's it! You will not feed them.

[01:15]

[Voice-over]: Stop feeding the occupier - this is the principled position of the organizers of the blockade of Crimea. The Mejlis of the Crimean Tatar people has stopped the supply of goods to the occupied peninsula.

[01:23]

[Refat Chubarov]: It is unacceptable that our goods should be supporting the occupying power, especially the military garrisons, which they have set up all over Crimea. Let them think how they are going to bring food from mainland Russia instead of tanks.

[01:40]

[Voice-over]: Over time, the blockers were joined by the Right Sector, Azov Civil Corps activists and hundreds of patriotically-minded people. Half a thousand activists guarded the administrative border with Crimea every day.

[01:52]

[Evelina Arifova]: Here, if you remember all the emotions you had back then. It's unreal to describe, because my heart was bursting out of my chest. There was such a fountain of patriotism, when you wanted to do everything possible for Crimea. Someone showed their talents, who could cook - cooked, who could build - built.

[02:12]

[Voice-over]: This poster contains almost the entire history of the blockade of Crimea. It was created by Evelina Arifova, now a member of the 'Asker' civic formation. From the first days of blockade she was on duty. It contains names, messages, autographs of those who together wrote the newest history of the annexed peninsula.

[02:30]

[Lenur Islyamov]: That's from Donbass here, it says: '27.09'. Here, that's his signature. Enver's, that is, his name is Enver Kutia. Here, his signature; he is still here with us now. That's Amina who is not here anymore, she is dead now. Here, she wrote: '25.09.2015. Amina Tatar Bandera.' She is, unfortunately, no longer with us. Here we have: Azov, Right Sector. Here, Vorobey Cossack - the biggest patriot of Ukraine. Here [unintelligible]. Before that, here, Aydar. Those are from Turkey, who came here: Rambo, Serbes Turklesov, Lagov.

[03:08]

[Voice-over]: Lenur Islyamov, the organiser of the blockade, recalls that in those days the phone was ringing off the hook with people wanting to help.

[03:15]

[Lenur Islyamov]: People called, saying: ‘Hold on!’ People called and said: ‘Come on, where can I transfer money to?’ You have to give credit to those people who came and worked completely as volunteers, as cooks. They helped, washed, cleaned and served. It was very hard work! Doctors came. Doctors who stayed with us. The only thing we didn’t have was childbirth. But there were even weddings. Really, energy was everywhere. People were all on fire.

[03:41]

[Voice-over]: However, not everyone was so enthusiastic. Ukrainian business at the time, which had close relations with the already annexed Crimea, was in no way willing to lose billions of dollars in revenue. So threats to the organizers of the blockade were pouring in every day.

[03:56]

[Lenur Islyamov]: They pushed business cards of some secret service officers in our hands in the vans: ‘Here, please, we are from that man.’ Yanukovich was no longer there, but business was still operating by those laws. I grew up in that time, I was setting up my business in the time of banditry. That is why, when people threaten me, I’m not afraid of such people. It is much more difficult with people who quietly do their business.

[04:18]

[Voice-over]: The leader of the Crimean Tatar people, Mustafa Dzhemilev. Then in 2015 he was at the forefront of the blockade of Crimea.

[04:26]

[Mustafa Dzhemilev]: In the history of world wars, it had never happened that a partially occupied country continued to supply the occupier with everything it needed. That happened here because many people did not give a fig about the territorial integrity of their country, about the dignity of the country. The main thing for them was to make money.

[04:44]

[Voice-over]: Empty shelves in shops, rising prices on markets - Ukrainian goods stopped coming to Crimea. Two weeks after the blockade began, high-voltage lines supplying electricity to the peninsula began to fall down. On 22 November, unknown persons damaged the last tower. The next day, the occupation authorities declared a state of emergency in Crimea. The lights went out, mobile phone service was cut off, and people did not go to work. Recalling that time, Mustafa Dzhemilev says that the blockade was the only right answer to the challenges of reality. Crimea returned to the global political agenda, and the Cabinet of Ministers officially banned the movement of cargo vehicles across the administrative border after an appeal by the president. Sanctions against Russia for the annexation of the peninsula, including trade sanctions, were imposed by almost all EU countries and the US.

[04:26]

[Mustafa Dzhemilev]: They talked about the blockade, but at the same time they talked about how it had happened – the occupation of Crimea. Thousands and tens of thousands of publications all over the world. This is the subject that was understood in Crimea. And the main point of our strategy, as long as we do not contemplate military liberation of Crimea, is to make the maintenance of the occupied territory of Crimea as expensive as possible for Russia. And we have achieved that goal too.

[06:15]

[Voice-over]: On 31 December, activists removed all roadblocks at checkpoints with occupied Crimea. In another year, the trade blockade of Crimea will be hailed in Ukraine and around the world as the first most effective step to begin de-occupation. But there are many more steps ahead. The main one is granting autonomy to Crimean Tatars.

[06:36]

[Lenur Islyamov]: The pace we maintained since the blockade, we must keep it up. The ATR TV channel that airs news every day. It is like an information bomb that flies out of the mainland and hits right on target because we are telling the truth about what is happening in Crimea. It is not highly visible and doesn't bring in cash, but it is very important politically for those people who are now in this hostage situation in Crimea.

Exhibit AH

Federal State Statistics Service, RESULTS OF THE POPULATION CENSUS IN THE CRIMEAN FEDERAL DISTRICT (Russian Institute of Statistics, 2015)

(excerpt, translation)

**Excerpt
Translation**

Federal State Statistics Service, RESULTS OF THE POPULATION CENSUS IN THE CRIMEAN FEDERAL DISTRICT (Russian Institute of Statistics, 2015), available at: https://rosstat.gov.ru/storage/mediabank/KRUM_2015.pdf.



FEDERAL STATE STATISTICS SERVICE

RESULTS OF THE POPULATION CENSUS IN THE CRIMEAN FEDERAL DISTRICT

OFFICIAL PUBLICATION

Information-publishing centre "STATISTICS OF RUSSIA»

MOSCOW
2015

UDC 60.721.13

BBC 314.02

193

Editorial board

A. Surinov - Chairman of the Editorial Board

M. Dianov - Deputy Chairman of the Editorial Board

V. Arkhangelskiy, A. Bazarov, V. Blinchuk, V. Voronin, M. Denisenko, V. Yelizarov, L. Eroshina, A. Zhuravskiy, V. Zorin, A. Zotova, N. Konovka, G. Kulyaeva, O. Manzhula, V. Nesterov, S. Nikitina, G. Rivina, V. Stepanov, E. Strakhova, E. Frolova, O. Chudinovskikh, G. Sheverdova, G. Scherbakova

Results of the population census in the Crimean Federal District / Federal Service of State Statistics. - Moscow: Russian Statistics Information Centre, 2015. - 279 p.

ISBN 978-5-4269-0054-7

This is the official publication of the results of the federal statistical observation "Population Census in the Crimean Federal District" with 100 percent coverage of the population.

The publication contains information on the results of the census in the Crimean Federal District on the size and location of the population, age and sex composition and marriage status, fertility, number and composition of households, nationality, native language, language proficiency, citizenship, educational level, sources of livelihood, economic activity (employment and unemployment), length of residence of the population in the place of permanent residence, as well as housing conditions of the population. The data for the Crimean Federal District is presented in comparison with similar data from the All-Russian Population Census 2010 and supplemented by graphical, tabular and cartographic material. For each topic there are tables with characteristics of population, households and dwellings for the Crimean Federal District, the Republic of Crimea and Sevastopol, as well as the urban districts and municipal areas included in them.

UDC 60.721.13

BBC 314.02

ISBN 978-5-4269-0054-7

© Federal State
Statistics Service, 2015
E-mail: stat@gks.ru
<http://www.gks.ru>

[...]

Urban settlements are home to 86% to 88% of Karaites and Krymchaks, 62% to 64% of Bulgarians and Armenians, Russians, 52% to 54% of Germans and Greeks. There is an equal proportion of urban and rural inhabitants among Ukrainians. A high proportion of the population living in rural areas is found among Crimean Tatars (74%) and Tatars (66%).

[...]

Exhibit AI

State Council of the Republic of Crimea, *Edip Gafarov*

(translation)

Translation

State Council of the Republic of Crimea, *Edip Gafarov*, available at: <http://crimea.gov.ru/deputy/285>.

Edip GAFAROV

Mr. Gafarov was elected in the republican electoral district as a member of the Crimean regional branch of the All-Russia Political Party “United Russia”.

He is Deputy Chairman of the State Council of the Republic of Crimea and member of the faction of “United Russia” in the State Council of the Republic of Crimea.

Biographical Note

Deputy Chairman of the State Council of the Republic of Crimea, member of the All-Russia Political Party “United Russia”.

Mr. Gafarov was born on the 9th of May 1952 in the village of Aktash, Narpai District of the Samarkand Region, Uzbek SSR. He has a higher education and graduated from the Samarkand State Architecture & Construction Institute in 1982 with a major in Industrial and Civil Engineering.

In 2004, he graduated from the Kharkov Regional Institute of Public Administration at the National Academy of Public Administration under the President of Ukraine as a Master of Public Administration.

From 1970 to 1972, Mr. Gafarov served in the Group of Soviet Forces in the German Democratic Republic. He started his career in 1974 at the Samarkand Regional Department of Property Inventory and Registration Authority. During his employment there, he worked his way up from a technician to deputy head of the regional Property Inventory and Registration Authority. In 1991-1994, he worked as the director of a construction materials plant. From July 1994 to January 1999, he was a deputy manager, and then a manager of a construction group. In 1999, he became Deputy Chairman of the Republican Committee of the Autonomous Republic of Crimea on Nationalities and Deported Citizens. From December 1999 to June 2000, he was Acting Chairman of the Republican Committee of the Autonomous Republic of Crimea on Nationalities and Deported Citizens. From June 2000 to May 2002, he was Chairman of the Republican Committee of the Autonomous Republic of Crimea on Nationalities and Deported Citizens. From May 2002 to May 2005, he was Deputy Chairman of the Council of Ministers of the Autonomous Republic of Crimea. From July 2008 to April 2014, he was First Deputy Chairman of the Republican Committee of the Autonomous Republic of Crimea for Water Management Construction Projects and Irrigated Agriculture. On 4 April 2014, he was appointed Chairman of the Permanent Commission of the State Council of the Republic of Crimea on Interethnic Relations and Problems of Deported Citizens. From September 2014 to August 2018, he was Chairman of the Committee of the State Council of the Republic of Crimea on Interethnic Relations. From August 2018 to September 2019, he was Deputy Chairman of the State Council of the Republic of Crimea. Since September 2019, he is Deputy Chairman of the State Council of the Republic of Crimea.

Mr. Gafarov is married with two children.

He has got the following awards:

2001 – “Honoured Construction Worker of the Autonomous Republic of Crimea”;

2004 – Certificate of Honour from the Cabinet of Ministers of Ukraine;

2015 – Fidelity to Duty Order.

Mr. Gafarov was a member of the Verkhovnaya Rada of the Autonomous Republic of Crimea of the 2002-2006 convocation and a member of the 6th convocation of the State Council of the Republic of Crimea in 2010-2014 (the Supreme Council of the Autonomous Republic of Crimea).

From September 2014 to September 2019, he was a member of the 1st convocation of the State Council of the Republic of Crimea.

From September 2019, he is a member of the 2nd convocation of the State Council of the Republic of Crimea.

Exhibit AJ

State Council of the Republic of Crimea, *Chinghiz Yakubov*

(translation)

Translation

State Council of the Republic of Crimea, Chinghiz Yakubov, available at: <http://crimea.gov.ru/deputy/394>.

Chinghiz Fevzievich YAKUBOV

Mr. Yakubov was elected in the republican electoral district as a member of the Crimean regional branch of the All-Russia Political Party “United Russia”.

He is a Rector of the Crimean Engineering and Pedagogical University, a state-funded institution of higher education of the Republic of Crimea, and a member of the faction of “United Russia”.

Mr. Yakubov is a member of the following committees of the State Council of the Republic of Crimea

- Committee on Culture and Cultural Heritage Protection Issues
office 438, phone 544-125, 27-40-34, e-mail: kult@crimea.gov.ru, for public contacts: pisma-grazhdan@crimea.gov.ru (Committee member)
- Committee on People's Diplomacy and Interethnic Relations
office 517, phone 544-141, e-mail: mnac@crimea.gov.ru, for public contacts: pisma-grazhdan@crimea.gov.ru (Committee member)
- Committee on Education, Science and Youth Policy
office 453, phone 544-155, e-mail: nauk@crimea.gov.ru, for public contacts: pisma-grazhdan@crimea.gov.ru (Committee member)
- Committee for Patriotic Education and Veterans Affairs
office 320, e-mail: patriot@crimea.gov.ru, for public contacts: pisma-grazhdan@crimea.gov.ru (Committee member)

Biographical Note

Mr. Yakubov was born on the 5th of May 1972 in Tashkent, Sabir Rakhimov District, Uzbek SSR.

He has a higher education and graduated from the Tashkent State Technical University in 1994.

From January 1996 to November 1998, Mr. Yakubov was a lecturer at the Department of General Technical Disciplines of the Crimean Industrial and Pedagogical Institute. From November 1998 to November 2001, he completed postgraduate studies at the Kharkov Polytechnic Institute (a national technical university) as part of off-the-job training. From November 2001 to September 2005, he was a lecturer at the Department of Mechanical Engineering Technology of the Crimean Engineering and Pedagogical University (hereinafter, CE&PU). From September 2005 to September 2006, he was a senior lecturer at the Department of Mechanical Engineering Technology of CE&PU. From September 2006 to September 2009, he was an Associate Professor at the Department of Mechanical Engineering Technology of

CE&PU. From September 2009 to November 2009, he was an Associate Professor at the Department of Integrated Mechanical Engineering Technologies of the Kharkov Polytechnic Institute. From November 2009 to November 2012, he studied for a doctorate degree at the Kharkov Polytechnic Institute as part of on-the-job training. From September to December 2012, he was a part-time Associate Professor at the Department of Mechanical Engineering Technology of CE&PU. From December 2012 to June 2014, he was a full-time Associate Professor at the Department of Mechanical Engineering Technology of CE&PU. From June 2014 to November 2016, he was Head of the Department of Mechanical Engineering Technology of CE&PU. From November 2016 to date, he is the Rector of the Crimean Engineering and Pedagogical University, a state-funded institution of higher education of the Republic of Crimea

Mr. Yakubov is married with four children.

He has got the following awards:

2018 – Certificate of Honour from the Ministry of Education, Science and Youth of the Republic of Crimea; 2018 – Honoured Worker of Science and Technology of the Republic of Crimea;

2022 – Diploma of the Presidium of the State Council of the Republic of Crimea.

From September 2019, Mr. Yakubov is a member of the 2nd convocation State Council of the Republic of Crimea.

Communication with constituents

Information on handling public appeals

Reception schedule

Feedback from constituency

Information on income, expenses, assets and property liabilities

Exhibit AK

Milli Firka, *Mejlis wants Mogilev's resignation* (7 May 2013)

(translation)

Translation

Milli Firka, *Mejlis wants Mogilev's resignation* (7 May 2013), available at: <http://milli-firka.org/меджлисмены-хотят-отставки-могилева/>.

Mejlis wants Mogilev's resignation

07.05.2013

Mejlis wants Mogilev's resignation

A briefing for journalists was held in Simferopol on 4 May 2013 following a closed meeting between members of the Mejlis and representatives of Crimean Tatar organizations and associations from Turkey and several other countries.

The briefing, along with Mustafa Dzhemilev, head of the Mejlis, was attended by Chairman of the Istanbul branch of the Society of Culture and Mutual Assistance of Crimean Tatars in Turkey Dzhelyal İçten, Mejlis representative in Turkey Zafer Karatay, Head of Crimean Tatar Culture and Mutual Assistance Society of Eskisehir Mesut Or and representative of Crimean Tatar Culture and Mutual Assistance Society of Kocaeli (Turkey) Zumran Araci. This was reported by the website of the Milli Mejlis.



The head of the Mejlis revealed the theses of the draft resolution, which Mejlis intends to announce at its rally on 18 May, on the Crimean Tatar People's Day of Mourning. One of the main points of the resolution will be a demand for the resignation of the current Crimean prime minister, Anatoliy Mogilev, as well as a demand for the Ukrainian authorities to recognise the Mejlis as a representative body of the people.

"Now Ukraine does not recognise the Qurultay as a body elected by the people and gives full power to the 'Council of Representatives'," the Mejlis head complained to the authorities.

M. Dzhemilyev also said that the Mejlis has always been and remains the defender of Ukraine's independence and territorial integrity and its integration into the European and Euro-Atlantic community.

According to him, the unprecedented pressure, rejection and desire to destroy the Mejlis is the machinations of certain chauvinist forces of the modern Ukrainian authorities.

"All responsibility for this criminal policy and possible complications lies precisely with these forces in Ukraine, led by Crimean Prime Minister A. Mogilev," the Mejlis leader pronounced his verdict on the Ukrainian authorities.

Exhibit AL

RIA Novosti, *The 75th Anniversary of the Deportation of Peoples from Crimea: Remembrance Events at the Syuren Memorial* (18 May 2019)

(translation)

Translation

RIA Novosti, *The 75th Anniversary of the Deportation of Peoples from Crimea: Remembrance Events at the Syuren Memorial* (18 May 2019), available at: <https://crimea.ria.ru/20190518/1116661184.html>.

Commemorative events dedicated to the Day of Remembrance of the Victims of the Deportation of Ethnic Groups from Crimea are being held in the Republic. The main event took place at the site of the Syuren Memorial Complex which is currently under construction in the Bakhchysarai District. It was attended by Sergey Aksenov, Head of the Republic of Crimea, Efim Fiks, First Vice Speaker of the Parliament of the Republic of Crimea, Ruslan Balbek, a member of the State Duma, Metropolitan Lazarus of Simferopol and Crimea, Mufti Emirali Ablaev of Crimea, members of the Crimean Parliament, and members of the Council of Ministers of the Republic of Crimea.

Exhibit AM

Crimean Tatar Museum of Cultural and Historical Heritage, *Events in Memory of Victims of
Deportation of Peoples from Crimea Held at Syuren Station (18 May 2022)*

(translation)

Translation

Crimean Tatar Museum of Cultural and Historical Heritage, *Events in Memory of Victims of Deportation of Peoples from Crimea Held at Syuren Station (18 May 2022)*, available at: <https://krtmuseum.ru/18-maya-den-pamyati-zhertv-deportatsii-narodov-kryma/>.

Founded by the Ministry of Culture of the Republic of Crimea



Events in Memory of Victims of Deportation of Peoples from Crimea Held at Syuren Station

On the 18th of May, the Crimean Tatar Museum of Cultural and Historical Heritage held a poster exhibition at the site of the Syuren Memorial Complex in the Bakhchysarai District named “Forever in People’s Memory” and dedicated to the memorable events of the 18th of May 1944, to life in exile settlements, to repatriation of the people to Crimea, and to the restitution of the deported peoples’ rights after Vladimir Putin, President of the Russian Federation, signed the Decree “On Measures for the Rehabilitation of the Armenian, Bulgarian, Greek, Crimean Tatar and German Peoples and on State Support of Their Revival and Development” on the 21st of April 2014, as part of the commemorative events dedicated to the 75th anniversary of the deportation of peoples from Crimea.

A requiem concert dedicated to the 75th anniversary of the deportation of peoples from Crimea was also given at the Syuren Memorial Complex.

Words of sympathy for the deported peoples were offered by Sergey Valerievich Aksenov, Head of the Republic of Crimea, Efim Zisievich Fiks, First Deputy Chairman of the State Council of

the Republic of Crimea, Chairman of the Committee for Nation-Building and Self-Governments at the State Council of the Republic of Crimea, and by Metropolitan Lazarus of Simferopol and Crimea.

Haji Emirali Ablaev, Mufti of Muslims of Crimea, recited a *dua* (prayer) in memory of the victims.

Annex 28

Witness Statement of [REDACTED], 7 March 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

WITNESS STATEMENT OF

[REDACTED]

7 MARCH 2023

1. I, [REDACTED], declare the following:
2. I [REDACTED]
[REDACTED].
3. I have been asked to give a witness statement in the dispute on racial discrimination before the International Court of Justice. In this witness statement, I describe the development of the song and dance culture of the Crimean Tatar people in Crimea and, in particular, the role played by the Haytarma ensemble. I also describe the activities of this group related to the Ukrainian culture. My witness statement is based on my personal knowledge and experience accumulated during more than twenty years of my creative work in Crimea, as well as memories of the people I know.
4. I received my artistic education [REDACTED]
[REDACTED]
[REDACTED].
5. Since then my creative work has been inextricably associated with Crimea [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].
6. The Haytarma ensemble became part of the Crimean Philharmonic in 1992, but its history began much earlier, in 1939. During the years of deportation, it was revived in Uzbekistan in 1957 and remained one of the few surviving centers of Crimean Tatar culture. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].
7. Despite the importance of the Crimean Philharmonic and its member ensembles for the culture of Crimea, we had to live through some difficult times before 2014. The money allocated from the state budget of Ukraine was barely enough for salaries, and even those were cut in half in 2010. As far as I know, the Haytarma ensemble had a particularly hard time: they experienced difficulties with going on tours at the proper level; there was not enough money for costumes and makeup, equipment and machinery.

8. In 2016 [REDACTED], those problems, fortunately, were already in the past thanks to additional government funding, which did not exist before 2014. At the moment Ensemble is fully supported by the Ministry of Culture of the Republic of Crimea and has the opportunity to develop its full potential. For example, more than 200 million roubles are allocated from budgetary funds in favour of the Crimean State Philharmonic,¹ and in total, more than 1.1 billion roubles were allocated to the Philharmonic from 2017 to 2022.² In comparison, in 2013 Ukraine set a maximum limit of budgetary subsidies limit for philharmonics at just over 16 million hryvnas, which was about 60 million roubles at the then exchange rate.³



The Haitarma ensemble performs in 2018

9. [REDACTED] perform a lot in different Russian cities, we introduce our culture to other regions: from Rostov-on-Don and Krasnodar Kray to

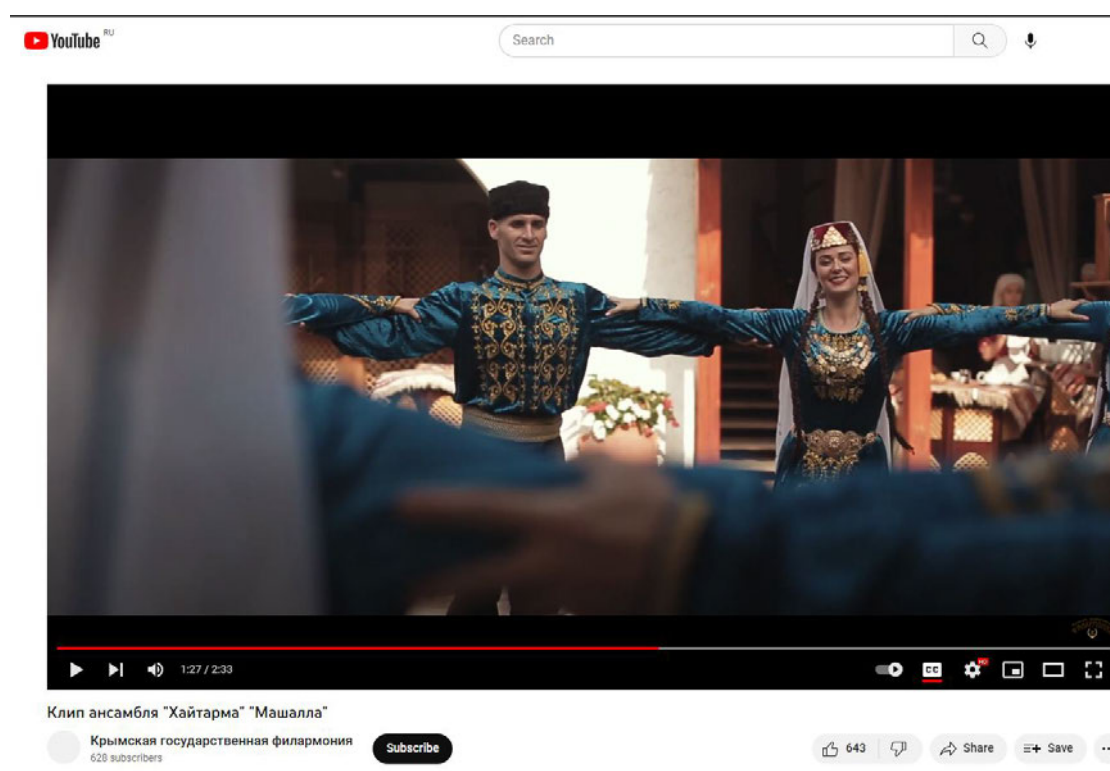
¹ Ministry of Culture of the Republic of Crimea, Budget Expenditure Report 2022, 13 October 2015, available at: https://mkult.rk.gov.ru/uploads/txteditor/mkult/attachments//d4/1d/8c/d98f00b204e9800998ecf8427e/phpmoz7U_i_25.pdf (Exhibit A).

² Crimea-news.com, *Crimea Government Holds Meeting on Crimean State Philharmonic Society Issues* (20 September 2022), available at: <https://crimea-news.com/culture/2022/09/20/968984.html> (Exhibit B).

³ Verkhovnyaya Rada of the Autonomous Republic of Crimea, Decree “On the Budget of the Autonomous Republic of Crimea for 2013” No. 1075-6/12, 26 December 2012, available at: https://ips.ligazakon.net/document/view/km120459?an=1&ed=2013_12_25 (Exhibit C)

Khabarovsk and Vladivostok. We were even invited to the Nicaraguan Embassy in Moscow!

10. We also often tour abroad: we visited Serbia in 2016, Vietnam in 2017 and Armenia in 2021 and 2022. Our most memorable tours were to Turkey in 2018 and 2019, where we performed at the Crimean Tatar Culture Days; after all, the largest diaspora of Crimean Tatars lives in Turkey.
11. We now have the opportunity to make professional videos of our performances so that they can get more people interested in our culture.



A music video of the Haytarma ensemble with the song “Mashalla”. The video is available at: https://www.youtube.com/watch?v=pA34BIw_9lc

12. It is noteworthy that our repertoire includes not only Crimean Tatar songs and dances – we also perform Georgian, Armenian, Gypsy, Russian and Ukrainian dances and songs in different languages; I myself sing in more than 15 languages.
13. Our Ukrainian show acts are also popular: the gopak dance and the Chornobrivtsy song.



The Haytarma ensemble performs gopak. The video is available at:

<https://www.youtube.com/watch?v=ktT9e-gEkEQ>

14. But the heart of the ensemble is always the Crimean Tatar culture. We have complete control over our repertoire.
15. We have put on many new concert programmes in recent years. Many of them are designed to tell the audience about the history of Crimean Tatars, to show them the ancient traditions of our song and dance.
16. The concert programme “Vatan Sedasi” (Echoes of the Motherland), for example, is dedicated specifically to that theme. The theatricalized musical programme “Bakhchisaray – Khansaray” is inspired by the Khan’s Palace: in it we try to recreate the spirit of the Khan’s dynasty times. The Khansaray chechekleri (Dreams of the Rose Garden) programme is based on the poetry of the Crimean Tatar Khans of the 14th century. The “Khatyra” (Memory) programme talks about the difficult pages of our history: it is dedicated to the victims of the deportation.
17. At the same time, we also have “modernized” performances to interest young people in our culture. For example, the “Altyn Beshik” (Golden Cradle) programme is based on ancient Crimean legends, but in addition to classical Crimean Tatar dances, there are also show acts with elements of modern dance and dancing en pointe.

18. We also have musical productions based on famous fairy tales to appeal to the youngest audiences.
19. Thus, the Crimean Tatar culture is actively developing in Crimea, and specifically thanks state support for our Ensemble.
20. As a Crimean Tatar woman and [REDACTED] of the Crimean Tatar Ensemble, I do not feel any discrimination against me.
21. I hereby confirm that, to the best of my knowledge and beliefs, the information set out in this witness statement is correct.

Witness

[SIGNATURE] _____

[REDACTED]

Simferopol, 7 March 2023

LIST OF EXHIBITS

Number:	Name of exhibit:
Exhibit A	Ministry of Culture of the Republic of Crimea, Budget Expenditure Report 2022, 13 October 2015.
Exhibit B	Crimea-news.com, <i>Crimea Government Holds Meeting on Crimean State Philharmonic Society Issues</i> (20 September 2022).
Exhibit C	Verkhovnaya Rada of the Autonomous Republic of Crimea, Decree “On the Budget of the Autonomous Republic of Crimea for 2013” No. 1075-6/12, 26 December 2012.

Exhibit A

Ministry of Culture of the Republic of Crimea, Budget Expenditure Report 2022,
13 October 2015

(translation)

Translation

Ministry of Culture of the Republic of Crimea, Budget Expenditure Report 2022, 13 October 2015, available at:

https://mkult.rk.gov.ru/uploads/txteditor/mkult/attachments//d4/1d/8c/d98f00b204e9800998ecf8427e/phpmoz7Ui_25.pdf.

Annex
to the decree of the Council of
Ministers
of the Republic of Crimea
dated 13 October 2015, No. 609

State Autonomous Cultural Institution of the Republic of Crimea “Crimean State Philharmonic”

(name of institution)

as of 1 January 2023

Indicator name	analytics code	Approved planned assignments, in roubles	Performed, in roubles	Performance metrics, %
Salary	211	136 937 082,02	136 937 082,02	100,0
Social benefits and compensation	266	334 750,98	334 750,98	100,0
Accruals for payroll payments	213	41 341 126,97	41 341 126,97	100,0
Other payments (per diem)	212	46 391,16	46 391,16	100,0
Communication services	221			
Transport services	222	488 700,00	488 700,00	
Utilities	223	135 868,98	135 868,98	100,0
incl. water consumption		84 436,58	84 436,58	100,0
municipal solid waste		51 432,40	51 432,40	100,0
Energy resources	223	1 329 275,14	1 329 275,13	100,0
incl. electricity		343 006,75	343 006,75	100,0
gas		505 330,37	505 330,36	100,0

Annex 28 Exhibit A

heating		480 938,02	480 938,02	100,0
property rental charge	224	0,00	0,00	
work, property maintenance services	225			
other work, services	226	8 346 421,53	3 346 421,53	40,1
Insurance	227	1 962,12	1 962,12	100,0
Services, work for capital investment purposes	228			
Other expenses (taxes, fines, penalties, etc.)	290			
Increase in value of fixed assets	310	16 610 396,00	16 610 396,00	100,0
Increase in value of intangible assets	320			
Increase in value of tangible assets	340	693 904,00	693 904,00	100,0
TOTAL EXPENSES	x	206 265 878,90	201 265 878,89	97,6

Deputy Director

General

[signature]

P. Paramonova

Chief accountant

[signature]

A. Bocharova

Exhibit B

Crimea-news.com, *Crimea Government Holds Meeting on Crimean State Philharmonic Society
Issues* (20 September 2022)

(translation)

Translation

Crimea-news.com, *Crimea Government Holds Meeting on Crimean State Philharmonic Society Issues* (20 September 2022), available at: <https://crimea-news.com/culture/2022/09/20/968984.html>.

Crimea Government Holds Meeting on Crimean State Philharmonic Society Issues

A meeting on the activities of the Crimean State Philharmonic Society was held in Simferopol under the leadership of the Deputy Chairman of the Council of Ministers of the Republic of Crimea Mikhail Nazarov.

The meeting was attended by Crimean Minister of Culture Tatiana Manezhina, deputy ministers Andrey Tereshchenko, Lilia Memetova, Natalia Pisareva, chairman of the supervisory board of the Crimean State Philharmonic Society, general director of the joint-stock company “Fiolent Plant” Alexander Batalin, general director of the Crimean State Philharmonic Society Tamara Aronova and her deputies, artists, staff, and heads of philharmonic arts groups.

The event summed up the results of the Crimean Philharmonic Society's activities in the previous periods, and also discussed possible solutions to problems. In particular, the meeting considered aspects of fulfilling the state assignment and achieving targets thereof, as well as financing, organisation of the rehearsal process, tours and concert programmes.

Tatyana Manezhina noted that the Head of the Republic of Crimea and the leadership of the Council of Ministers of the Republic highly appreciated the success of artists and groups of the Philharmonic Society, were aware of the current difficulties of the Society and many years of inadequate material support of the institution. The activities of the Philharmonic Society in the Crimea are important and visible (over the past five years, the Society received 66 awards of the Council of Ministers and the State Council of the Republic of Crimea of different value, besides agency-level awards).

Between 2017 and 2022, RUB 1,155 mln was allocated to the Philharmonic Society from the Crimean budget, including RUB 28.8 mln to strengthen its material and technical base (purchase of stage costumes and footwear, musical instruments and equipment, including as part of anti-terrorist measures).

The Ministry has taken all necessary measures to provide the Philharmonic staff with workplaces in other organizations in connection with the start of the long-awaited renovation of the Philharmonic Society building on Pushkin Street in Simferopol.

At present, the Ministry has submitted proposals for the draft Republican Targeted Investment Programme and Capital Repair Plan for repair and restoration works in 2023-2025 (cost RUB 77.7 mln) on the L.F. Schlee House in Simferopol, which is the base of the L.D. Chernysheva Vocal and Choreographic Ensemble “Tavria”.

As part of the Republic of Crimea Capital Repair Plan, the Ministry has organised work to develop scientific and design documentation for the Pushkin Theatre building in Yevpatoria at a cost of RUB 17.8 mln.

As a result of the meeting, instructions were given to Tamara Aronova, General Director of the State Philharmonic Society, to work out further ways of solving the pressing problems. All questions concerning the Philharmonic Society activities and employee appeals are under control of the Ministry of Culture of the Republic of Crimea.

Exhibit C

Verkhovnaya Rada of the Autonomous Republic of Crimea, Decree “On the Budget of the Autonomous Republic of Crimea for 2013” No. 1075-6/12, 26 December 2012

(excerpt, translation)

**Excerpt
Translation**

Verkhovnaya Rada of the Autonomous Republic of Crimea, Decree “On the Budget of the Autonomous Republic of Crimea for 2013” No. 1075-6/12, 26 December 2012, available at: https://ips.ligazakon.net/document/view/km120459?an=1&ed=2013_12_25.

**VERKHOVNAYA RADA OF THE AUTONOMOUS REPUBLIC OF CRIMEA****DECREE****On the budget of the Autonomous Republic of Crimea for 2013**

As amended and supplemented by the Decrees of the Verkhovnaya Rada of the Autonomous Republic of Crimea

of 20 February 2013 No. 1138-6/13,
of 27 March 2013 No. 1183-6/13,
of 17 April 2013 No. 1230-6/13,
of 22 May 2013 No. 1266-6/13,
of 21 June 2013 No. 1310-6/13,
of 7 August 2013 No. 1346-6/13,
of 18 September 2013 No. 1390-6/13,
of 18 October 2013 No. 1441-6/13,
of 27 November 2013 N No. 1482-6/13,
of 25 June 2013 No. 1535-6/13

The Verkhovnaya Rada of the Autonomous Republic of Crimea **decides:**

[...]

"3.2 Establish for 2013 the procedure for determining the budgetary allocation limit for theatre, entertainment and concert organisations in the following amounts:

Types of organisations	Subsidy from the budget of the Autonomous Republic of Crimea (thous. grivnas)	Planned own revenues from self-supporting activities (thous. grivnas)	Amounts subsidised in case of failure to fulfil the plan for income from self-supporting activities (thous. grivnas)
Theatres	35876,7	7617,4	25113,7
Philharmonic and concert organisations	16383,2	2095,0	11468,2

Annex 29

Witness Statement of [REDACTED], 7 March 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

WITNESS STATEMENT
OF [REDACTED]

7 MARCH 2023

1. I, [REDACTED] (hereinafter, “Museum”) and [REDACTED] declare the following:
2. I am providing this witness statement on issues raised in the resolution of dispute initiated by Ukraine before the International Court of Justice. In my statement, I will describe the activities of our museum, its importance for the preservation of the culture of the Crimean Tatar people, and the current condition of the Museum.
3. My witness statement is based on my personal knowledge, which I possess by virtue of my position [REDACTED].
4. The Museum is a complex structure. It consists of several departments: in addition to the funds department, research and display work department and cultural-educational and exhibition work department located in Simferopol, the structure of the Museum also includes [REDACTED].
5. Below are photos of the memorial complex, which commemorates the victims of the main tragedy in the history of the Crimean Tatar people – the Deportation in 1944. This place is especially significant because it was from the railway station “Siren” that the trains with the deportees departed. Now mourning events are held here every year. The complex was built after 2016 thanks to the Russian authorities, who fully financed its creation, investing hundreds of millions of roubles,¹ and are now allocating 9 million roubles for its maintenance.

¹ Regnum.ru, *The date of completion of the construction of the memorial to the victims of deportation was announced in Crimea* (20 April 2021), available at: <https://regnum.ru/news/3248235.html> (Exhibit A); Argumenty Nedely, *The cost of building a memorial in Crimea to the victims of the deportation has risen again by 300m roubles* (30 November 2020), available at: <https://argumenty.ru/society/2020/11/699760> (Exhibit B); RIA Novosti, *Aksyonov talks about what Crimea is doing for returnees* (18 May 2019), available at: <https://ria.ru/20190518/1553600929.html> (Exhibit C).





6. The main purpose of the Museum, established in 1992, was to collect the material fragments of Crimean Tatar culture that survived despite the deportation. At present, we have about 15,000 items of crucial historical and artistic importance for the Crimean Tatar people in our collection, but we do not intend to remain complacent from now on, and will further increase and grow it. We move forward with our activities thanks to the full support of the state and, first and foremost, the Ministry of Culture of the Republic of Crimea.

7. The most active visitors of the Museum are tourists and travelers from other regions. This gives hope that Crimean Tatar culture will become better known outside Crimea, but we also try to motivate the Crimean population to visit us more often. We organise master classes in folk crafts, seminars and conferences. For example, on 26 January 2023, with the support of the Ministry of Culture of the Republic of Crimea, the Museum hosted the presentation of the first-ever etymological dictionary of the Crimean Tatar language, prepared by Enver Kurtumerov, a lecturer of the Crimean State University n.a. Vernadsky. On 4 November 2022, the Museum joined the “Night of Arts-2022” all-Russian event and arranged a number of events for its visitors: a concert of the traditional Crimean Tatar music, a master class on Crimean Tatar tailoring, a literary evening and a concert at the Amet-Khan Sultan Museum in Alupka. The Museum of History and

Archaeology in Stary Krym hosted historical expositions dedicated to the ancient Crimean city of Solkhat, master classes on Crimean Tatar tailoring and beadwork, as well as clay molding of ceramics with folk Crimean Tatar ornaments. Below I am posting photos from these events.



Presentation of dictionary prepared by Enver Kurtumerov





Events at 'Night of Arts-2022'



Exposition dedicated to the ancient Crimean city of Solkhat at the Museum of History and Archaeology

8. We also actively establish links with other museums. Specifically, in 2018 the Council of Ministers of the Republic of Crimea signed an interregional agreement with the government of St. Petersburg. On the basis of that agreement, we were able to work with the Russian Museum of Ethnography. In the same year, we managed to jointly organise an exhibition in our Museum dedicated to Crimean Tatar embroidery of the beginning of the last century and photos documenting the life of Crimean Tatars during that period. The items for this exhibition were taken from the collections of the Russian Museum of Ethnography.
9. We also hope that the popularity of our Museum will grow as a result of joining the Pushkin Card Programme. This project allows young people aged 14 to 22 to visit museums, exhibitions and theatres at federal expense. We are sure it will help us to pass on our historical and cultural heritage to a new generation.
10. Thus, in my opinion, based on personal experience, Crimean Tatar culture, history and language are developing in Crimea thanks to state support and the activities of the Council of Crimean Tatars and other Crimean Tatar communities. Since 2014, much has been done for Crimean Tatar culture and history, and a large number of projects have been planned to promote Crimean Tatar culture.

11. My Crimean Tatar colleagues and I, as [REDACTED] and a Crimean Tatar woman, do not feel any political, cultural, linguistic pressure or discrimination in Crimea.
12. I hereby confirm that, to the best of my knowledge and beliefs, the information set out in this witness statement is true.

Witness

[SIGNATURE] _____

[REDACTED]

Simferopol, 7 March 2023

LIST OF EXHIBITS

Number:	Name of exhibit:
Exhibit A	Regnum.ru, <i>The date of completion of the construction of the memorial to the victims of deportation was announced in Crimea (20 April 2021).</i>
Exhibit B	Argumenty Nedely, <i>The cost of building a memorial in Crimea to the victims of the deportation has risen again by 300m roubles (30 November 2020).</i>
Exhibit C	RIA Novosti, <i>Aksyonov talks about what Crimea is doing for returnees (18 May 2019).</i>

Exhibit A

Regnum.ru, *The date of completion of the construction of the memorial to the victims of deportation was announced in Crimea (20 April 2021)*

(translation)

Translation

Regnum.ru, *The date of completion of the construction of the memorial to the victims of deportation was announced in Crimea* (20 April 2021), available at: <https://regnum.ru/news/3248235.html>.

The date of completion of the construction of the memorial to the victims of deportation was announced in Crimea

SIMFEROPOL, 20 April 2021, 17:44 - REGNUM The construction of the Memorial to the victims of deportation near the Siren Station in the Bakhchisaray District of the Republic of Crimea is 85 percent complete. This was reported by the regional government's press service on 20 April.

“To date, the work is progressing vigorously. We plan to have the main work completed by May 18, and then only the interior work will continue. The construction of the facility is budgeted at 286.5 million rubles, and work has already been carried out for 126 million. The arrangement of the museum complex is underway, monuments have been erected, works are being carried out in the mosque and the church, and some greenery has been planted. As for the money, 65% of the funds have been used, and 85% of the construction work is complete. It is planned that the object will be put into operation by December 1 of this year”, - Chairman of the State Committee on Interethnic Relations of the Republic of Crimea Ayder Tippa said.

Mourning events are planned for 18 May on Crimean Tatar Deportation Remembrance Day at the memorial complex.

As **REGNUM news agency** reported, a memorial capsule was laid at the site of the memorial in 2015. The first phase of the memorial was handed over by 18 May 2016. The entire complex was scheduled to be completed by 18 May 2019, but it was then postponed until May 2020, but even then the memorial was not ready. In February 2020, it was revealed that the contractor, StroyComTech Ltd, had blown the construction deadline, the contract with it was terminated and a new contractor was chosen

Exhibit B

Argumenty Nedely, *The cost of building a memorial in Crimea to the victims of the deportation has risen again by 300m roubles* (30 November 2020)

(translation)

Translation

Argumenty Nedely, *The cost of building a memorial in Crimea to the victims of the deportation has risen again by 300m roubles* (30 November 2020), available at: <https://argumenti.ru/society/2020/11/699760>.

The cost of building a memorial in Crimea to the victims of the deportation has risen again by 300m roubles

30 November 2020, 14:38 Source: Argumenty Nedely Krym



The cost of construction of the facility, which started in 2016, was 340 million rbl. Almost 300 was planned for 2021.

The construction of the memorial complex commemorating the victims of the 1944 deportation from Crimea began in 2016. The project was estimated at 340 million roubles. The project was postponed year after year. In 2020, it became known that the contractor demanded that the design and estimate documentation be revised upwards.

On 30 November 2020, at a meeting of the Crimean government, the minister of finance announced that the draft budget for 2021 “includes the construction and repair of a number of socially important facilities, namely ... the continuation of construction of a memorial complex to victims of deportation in the village of Siren – 294.4 million”.

Exhibit C

RIA Novosti, *Aksyonov talks about what Crimea is doing for returnees* (18 May 2019)

(translation)

Translation

RIA Novosti, *Aksyonov talks about what Crimea is doing for returnees* (18 May 2019), available at: <https://ria.ru/20190518/1553600929.html>.

Aksyonov talks about what Crimea is doing for returnees



© RIA Novosti / Alexey Malgavko

Head of the Republic of Crimea Sergey Aksyonov and Crimean Muslim Mufti Haji Emirali Ablaev at a commemorative event marking the Crimean deportation victims' Memorial Day. 18 May 2019

BAKHISARAY (Crimea), 18 May - RIA Novosti. Head of Crimea Sergey Aksyonov told journalists what measures are being taken in Crimea to settle the families of those deported in the 1940s and to achieve inter-confessional peace on the peninsula.

The memory of the victims of the deportation of Crimean peoples was honoured on Saturday 18 May near Bakhchisaray, at the Syren (formerly Syuren) Railway Station, from where Crimean Tatars, residents of south-western Crimea, were deported in 1944. Today, the memorial complex “Path of Revival of the Peoples of Crimea” is being built at this location. The event was attended by the Head of the Republic Sergey Aksenov, Crimean clergy - Crimean Muslim Mufti Emirali Ablaev and Metropolitan of Simferopol and Crimea Lazar, deputies, public figures and Crimean residents.

“More than 10 billion rubles have been allocated to support people who were deported, new flats are being allocated. Today we were at KIPU (National Engineering and Pedagogical University), what a huge centre of multi-ethnic culture is being built here. Under Ukraine they only promised to build it. A remarkable school in the Fontany neighbourhood (Simferopol) is one of the best equipped in Crimea (with education in the Crimean Tatar language – ed.). Much more is being done,” Aksyonov told reporters.



© RIA Novosti / Alexey Malgavko

Девушка на памятном мероприятии, приуроченном ко Дню памяти жертв депортации народов Крыма

The Head of Crimea recalled the construction of a memorial complex at the Syren station, the main works on which have already been completed. The amount of funding for the work is 400 million rubles, the authorities said earlier. Aksyonov also highlighted the construction of Crimea's central mosque in Simferopol.

“It will be an adornment of the city of Simferopol, just like the Alexander Nevsky Cathedral in the city centre. The construction is being carried out with the support of the President. And also... previously it was only promised (to build it), but nevertheless the matter has only moved forward in Russian Crimea,” Aksyonov said.



© RIA Novosti / Alexey Malgavko

Participants in commemorations marking the Day of Remembrance for the Victims of the Deportation of the Peoples of Crimea at the "Path of Revival of the Peoples of Crimea" memorial complex. 18 May 2019

During the Great Patriotic War, representatives of 20 nationalities, including Greeks, Armenians, Germans and Bulgarians, were forcibly deported from Crimea on suspicion or charges of treason. The Crimean Tatars suffered the most; more than 183 thousand people were deported from the peninsula at that time. Their deportation began on May 18, 1944.

After the referendum in March 2014, Crimea became part of the Russian Federation, and in April, Russian President Vladimir Putin signed a decree on measures to rehabilitate the Crimean Tatar and other peoples of Crimea.



© RIA Novosti / Alexey Malgavko

Remembrance Day for the victims of the deportation of the peoples of Crimea at the memorial complex “Path of Revival of the Peoples of Crimea” at the Syren Railway Station in the Bakhchisaray District. 18 May 2019

Annex 30

Witness Statement of [REDACTED], 22 February 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

WITNESS STATEMENT
OF 

22 FEBRUARY 2023

1. I, [REDACTED], declare the following.

2. I graduated from the [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. I provide this witness statement in relation to the allegations made in Ukraine's Reply to the Counter-Memorial of the Russian Federation on the dispute initiated by Ukraine before the International Court of Justice (hereinafter, "Reply"). My witness statement raises a number of issues relating to the territory of the probable location of the Palace of Kalga-Sultan in Simferopol. Ukraine claims that construction is allegedly taking place on the site of the Crimean Tatar cultural heritage monument, namely an Orthodox Christian church and a building have been constructed.¹ In reality, Ukraine's statements are full of false information and inaccuracies, which I am going to discuss below.

A. HISTORICAL CONTEXT

4. According to written sources and cartographic material, the Palace of Kalga-Sultan was supposedly located in the area Ukraine indicates. According to the available historical information, most of the buildings located on this territory were completely demolished during the construction of the S.H. Weisbord brewery in the middle of the 19th century. From that time until 1983, the territory was occupied by a large brewery.

5. In 1984, the buildings of the brewery were demolished and no profound archaeological research was carried out. To the best of my knowledge, only the basements of the brewery

¹ Reply, ¶659.

were examined in 1984, where single small fragments of medieval glazed pottery were found.

6. In the period when Crimea was part of Ukraine, there were no profound archaeological studies of these land plots. That said, I can say with certainty that the public knew that the Palace of Kalga-Sultan was situated somewhere on the territory of the former brewery, and it tried to attract attention of the Ukrainian authorities in every way possible to the need to conduct research and, if necessary, protect the cultural heritage of Crimean Tatars, which at that time did not attract much attention in Ukraine.
7. The studies of the site were carried out only after Crimea's reunification with the Russian Federation. In 2017, under the auspices of the Institute of Archaeology, an archaeological survey of the area of land on which the Palace of Kalga-Sultan was presumably located, was carried out. As a result of this study, the Palace of Kalga-Sultan was included in the Register of Cultural Heritage Monuments.² In this regard, Ukraine's argument that "[i]n 2017, an archaeological study of Akmejit and the Kalga-Sultan's palace was conducted so the Russian occupation authorities could begin the construction of a Russian Orthodox Church on the territory of a former brewery"³ has no foundation in facts.

B. CONDUCTING EXAMINATION

8. The Palace of Kalga-Sultan could supposedly be located on several plots of land. I have seen documents confirming that all these plots were transferred to private ownership by the Ukrainian authorities before 2014.
9. The owners of two of these plots approached Institute of Archaeology in 2019 with a request for an archaeological examination of the plots. One of the owners, Mr Shayarliyev O.S. was in conflict with the state authorities at the time he approached Institute of Archaeology, because based on the location of his plot within the boundary of a cultural heritage site they were prohibiting the development of the territory in question.

² See RAS Crimean Institute of Archaeology, Information on the newly discovered cultural heritage site for submission to the State Committee for the Protection of Cultural Heritage of the Republic of Crimea, 19 February 2018 (Exhibit A), p. 15; State Committee of Cultural Heritage Protection of the Republic of Crimea, Order No. 41, 27 March 2018 (Exhibit B).

³ Reply, ¶659.

10. According to the current Russian legislation (Federal Law No. 73), if there is a cultural heritage site on the territory of the plot which deserve to be museographed the possibility of building on it is severely limited or prohibited. The purpose of the expert examination owners of the plots wanted me to carry out was a comprehensive study of the plots to determine whether the cultural layer is spread throughout their entire territory and, if so, how this spread occurs.
11. The experts of the Institute of Archaeology conducted a thorough archaeological examination of the plots in accordance with the Contracts. As a result of this examination, it was found that more than half of the plots territory not examined in 2017 was occupied by buildings and cisterns of the brewery, during the construction of which the cultural layer had been completely destroyed. In the remaining territory of the plots, the cultural layer was only recorded in the form of individual interlayers, which were fully examined during the 2017 examination of the territory. According to single pottery fragments and a few coins, its accumulation began in the first half of the 19th century. However, even in the places of discovery, the cultural layer was also heavily damaged by economic activities in the 20th century.⁴
12. All surviving fragments of the cultural layer were fully examined in the course of the 2019 works on both the one and the other plots.⁵ Technical reports were sent to the clients of the works and then submitted to the State Committee of Cultural Heritage Protection of the Republic of Crimea (now the Department of Cultural Heritage Protection of the Ministry of Culture of the Republic of Crimea). The scientific report on the works was sent to the Department of Field Research of the Institute of Archaeology of the Russian Academy of Sciences. All archaeological finds obtained in the course of works were handed over to the Museum of History of Simferopol, where they are now.
13. Since the cultural layer on the two plots had been examined and no construction remains which deserve to be museographed had been recorded, both plots were excluded from the

⁴ RAS Crimean Institute of Archeology, Research and planning documentation for the boundary modification project in relation to the territory of newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" (Exhibit C), pp. 2-3.

⁵ RAS Crimean Institute of Archeology, Report of V.V. Masyakin on archaeological explorations in the territory of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" at 21 Vorovskogo Street, city of Simferopol, the Republic of Crimea in 2019 (Exhibit D).

boundaries of the cultural heritage object according to the current legislation of the Russian Federation (Federal Law No. 73). The excluded territory constituted approximately 1/6th of the total territory of the cultural heritage object. A similar procedure of changing the territory of cultural heritage objects after their archaeological examination is in place in Ukraine.

14. On the territory of the allotted plots, which are the personal property of their owners, these owners erected buildings, in particular, an Orthodox chapel. As far as I know, the Simferopol Eparchy objected to the construction of the latter.
15. As far as I know, the rest territory of the cultural heritage object has been preserved and is not being developed. Moreover, its expansion is being considered at the moment.
16. I hereby confirm that, to the best of my knowledge and beliefs, the information set out in this witness statement is true.

Witness

[SIGNATURE] _____



Simferopol, 22 February 2023

LIST OF EXHIBITS

Number:	Name of exhibit:
Exhibit A	RAS Crimean Institute of Archaeology, Information on the newly discovered cultural heritage site for submission to the State Committee for the Protection of Cultural Heritage of the Republic of Crimea, 19 February 2018.
Exhibit B	State Committee of Cultural Heritage Protection of the Republic of Crimea, Order No. 41, 27 March 2018.
Exhibit C	RAS Crimean Institute of Archeology, Research and planning documentation for the boundary modification project in relation to the territory of newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)".
Exhibit D	RAS Crimean Institute of Archeology, Report of V.V. Masyakin on archaeological explorations in the territory of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" at 21 Vorovskogo Street, city of Simferopol, the Republic of Crimea in 2019.

Exhibit A

RAS Crimean Institute of Archaeology, Information on the newly discovered cultural heritage site for submission to the State Committee for the Protection of Cultural Heritage of the Republic of Crimea, 19 February 2018

(translation)

Translation

RAS Crimean Institute of Archaeology, Information on the newly discovered cultural heritage site for submission to the State Committee for the Protection of Cultural Heritage of the Republic of Crimea, 19 February 2018.

**Information on the newly discovered cultural heritage site
for submission to
the State Committee for the Protection of Cultural Heritage of the Republic of
Crimea**

1. Site name:

Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan).

2. Dating of the site:

XVII-XVIII centuries.

3. Site location (region, district, rural area, or settlement; location features):

19-23 Vorovskogo Street, city of Simferopol, the Republic of Crimea.

4. Brief description of the monument (boundaries, nature of the cultural layer, major finds, losses that have changed the original appearance of the site):

The examined territory is wasteland in the mouth of Petrovskaya Balka ("Petrovskaya Ravine") located at 19-23 Vorovskogo Street. The wasteland is bounded to the north by Vorovskogo Street and to the east and south by Petrovskaya Balka Street and to the west by the cliffs of Petrovskiye Cliffs (Figures 1 to 5). The wasteland is a relatively flat site with numerous traces of anthropogenic influence, which is explained by the existence of Simferopol Brewery on this territory until the 80s of the XX century, when, following the construction of a new beer and soft drinks plant, it was closed down and dismantled. Within the boundaries of the site there are numerous potholes and cross-ditches, which formed as a result of extraction of ferrous and non-ferrous metals by local residents, and a considerable amount of construction

and household waste. The terrain descends gently from south to north. In the western part of the site, there is a water source (spring) in the wall, which may be identified as the source for the fountain that existed in the territory of the Palace of Kalga-Sultan palace and subsequently in the territory of the brewery. It is possible that the same spring is referred to as "Petrovsky Fountain" in late written and graphic accounts.

In order to identify the absence or presence of a cultural layer; to define more precisely from a stratigraphical perspective; and to identify possible construction debris, 9 archaeological pits (Nos.1-9) were dug and studied (Fig.5). Archaeological remains were found in pits Nos. 1-5, 7-9 and include fragments of ceramic vessels, smoking pipes, construction ceramics, metalware, numismatic finds, etc.

The thickness of the cultural layer is 1.4 to 3.0 metres, according to the results of the archaeological reconnaissance.

Pit 1. (Coordinates: N44.94807°, E034.11689°)

Located in the north-western part of the site, 17 m south of the parking area of the Training Centre of the Main Department of the Russian Ministry of Emergency Situations of the Republic of Crimea. It is oriented along the north-west - south-east line. The dimensions of the pit are 2x2 m. Under the vegetable layer there is a XX century layer of about 0.7 m thick under which stones can be seen in the north-eastern part. Beneath the stones is dark brown loam containing XVIII-XIX century remains (fragments of pottery vessels and a coin of the Russian Empire) (Figure 11). A trench oriented along the north-south axis with a XX century metal water (?) pipe was dug in the soil. Along the north-eastern side, below the vegetable layer, mortar-built foundations of a XX century building were found. In the south-eastern part of the pit, there is a large concrete remnant which could not be removed due to lack of technical means. Under the layer with finds from the XVIII and XIX centuries, there is a grey-brown sandy loam with an admixture of clay and possibly silt,; this layer is sterile and

contains no finds. Underneath is also a sterile pebble layer - apparently a continental surface, as neither it nor the previous layer contain finds (Figures 6 to 10).

Pit 2. (Coordinates: N44.94773°, E 034.11691°)

Located in the western part of the site, 16 m to the north-east of the electrical substation. The original dimensions of the pit were 2x2m, subsequently, in order to clarify the stratigraphic situation and detect hydraulic structures the pit was extended westwards by 1m and its dimensions are now 2x3m. It is oriented along the cardinal directions. Under the 0.1-0.15 m thick vegetable layer, there is a layer of dark brown loam containing XX century remains, construction waste, and asphalt. It also contains two pipes from the corresponding period (metal water pipe and ceramic sewage pipe?). On the northern side of the pit, beneath the turf layer, a stone and shell construction was found, which was embedded in the layer of the XX century. Under dark brown loam is light brown friable loam with small stones and rare inclusions of tiles and other XIX century materials. The thickness of this layer is 0.25 to 0.3 m. Under this layer and partly in it, there is a 0.1-0.15 m thick tile rubble. Beneath it, there is another layer of light brown loam with lime. The thickness of this layer is 0.2 to 0.25 m (Figures 13-16a). It also contains fragments of "Tartar"-type tiles, fragments of green-glazed pottery, imported Turkish faience and ceramic smoking pipes, fragments of ceramic pipes of various diameters, etc. Coins from the era of the Crimean Khanate (mid- XVIII century, see the table "Inventory of Coins") also come from this layer. At the base of this layer there is a ceramic water-pipe with partially preserved construction of small and medium-sized stones on lime mortar around it. Beneath the lime mortar, dark brown dense loam containing no archaeological remains is observed. The thickness of this layer is approximately 0.5 m. Underneath it, sterile continental clay can be traced, which was dug down to the depth of the test bayonet. Archaeological remains, including five segments of ceramic water pipe, were extracted from the layer, for further processing and transfer to the museum (Figures 17-18).

Pit 3. (Coordinates: N44.94785°, E034.11663)

Located 9 m north of the water source, in the north-western part of the site. Its dimensions are 3x3m. Under the vegetable layer, a 0.2 to 0.25 m thick, XX century layer of brown loam with large amounts of building and domestic debris (0.4 to 2 m thick) was revealed, and in the north-east corner, a XX century structure of shell limestone on cement mortar, which stands on a concrete foundation, is observed at a depth of 2 m. In the south-western part of the pit, under the vegetable layer, there is a slurry of clay mortar (?). Under it and under the XX century layer, at a depth of 0.8 to 0.9 m, in the central part of the square, masonry of ragged limestone with hewn outer edge, on clay mortar, is found. In the northern side of the pothole, a layer with remains of dismantled wall in the form of a clay column can be seen. The height of the remaining part of the wall from the foundation to the top course of the brickwork is 0.8 to 1 m, the depth of the foundation is 0.6 to -0.8 m. Along the wall, on both sides, there is a layer of light grey loam with an admixture of lime particles and XVIII-XIX century material (fragments of pottery and faience, "Tartar"-type tiles, coins of the Russian Empire) (Fig. 24 to 29). At the foundation level, there is a layer of soot, 0.05 to 0.1 m thick, under which is light grey, loose moist sandy loam containing material from the XVIII and XIX centuries. Beneath it, there is a sterile, dense horizon of clay and calcareous (rocky?) outcrops. Given that water had come out at this level at the bottom of the pit, the study was discontinued (Figures 19 to 23).

Pit 4. (Coordinates: N44.94790°, E034.11742°)

Located 34m west of the edge of the pavement on Vorovskogo Street, and 60m south of the car park of the Training Centre of the Main Department of the Russian Ministry of Emergency Situations in the Republic of Crimea. It is oriented along the cardinal points. Its dimensions are 2x2m. Under the 0.1-0.15 m turf a thick cultural layer of XX century is observed, which includes dark-brown loam containing construction waste and asphalt. A layer of grey loam with inclusions of charcoal, limestone grit and fragments of XIX century ceramics (tiles, fragments of vessels) was found under

the asphalt layer (Fig. 33). The thickness of the layer is 0.3 m. In the north-eastern corner there is a series of large stones (one of which had been worked, probably serving as a retaining base for a pillar). Under this layer, a light grey sandy loam with an admixture of clay is traced, as in Pit 1. It is similarly sterile, with a slightly lower thickness of 0.7m, and below this layer there is brownish-green sterile clay, continental surface. Control excavation of the continental clay was undertaken, no finds were found. In the south and west sides a layer of charcoal containing XIX century material could not be observed. In the southern side, at a depth of 0.8 m, an asbestos pipe embedded in grey sandy clay is observed. The depth at which the pipe lies in the trench is 1.2m. (Figures 30-32)

Pit 5. (Coordinates: N44.94722°, E034.11771°)

It was dug on the land plot at 21a Vorovskogo St., 1 m from the western wall of the site. The choice of the location for the pit was based on the proximity of the site to the area of the Scythian Naples Nature Reserve, the maps provided by Dubois de Monpere and Blaramberg, and German aerial photographs from 1941, in which the land plot had no buildings of the brewery on it. Although the land plot is not part of the area under the contract, it is of potentially high importance for the study. The original dimensions of the pit were 2x2m but subsequently it was extended eastwards and now its dimensions are 2x3m. The top layer is re-deposited soil, probably from construction work on the site (construction of a wall?) or other general labour activity. The thickness of the layer is 0.3 to 0.5 m. Under it, there is a thin layer of buried turf up to 0.05 m. Further, grey loam with construction and domestic waste and asphalt I observed. Under the asphalt, there is light grey loam with XVIII-XIX century remains (fragments of pottery vessels, smoking pipes, glass vessels, fragments of "Tartar"-type tiles). This layer is 0.4 m thick. Under this layer there is light grey sandy loam with small stones, 0.15-0.25 m thick. Under the light grey sandy loam, dark grey loam with rare inclusions of small limestone stones and fragments of "Tartar"-type tiles is observed in the upper part of the layer and at the bottom. The tile fragments at the base of the layer form the boundary with the next layer under which masonry

(foundation?) and slab paving to the north of the masonry can be observed in the western part of the pit. The layer above is light grey loam with limestone and tile fragments and fragments of XVII-XVIII century pottery vessels (Figs. 40-44). This layer can be roughly described as layer with remains of a dismantled wall. In the eastern part, the wall was disassembled just below the slab paving. The structure is masonry on clay mortar made of large equal hewn stones. The masonry is 0.8m wide and it was disassembled to the floor slabs. The wall is in the east-west direction, slightly deviating to the north. The paving (floor?) is a series of limestone slabs (5 pieces found), 0.4 m wide and 0.6-1.2 m long, the thickness of the slabs and the depth at which they had been laid were not clear at this stage of the study. In view of a threat to the integrity of the discovered structure and the reasonableness of opening this level of the cultural layer over a wide area, works at this location were discontinued (Figures 35-39).

Pit 6. (Coordinates: N44.94759°, E034.11722°)

Located at the place where there were traces of a trench excavated 33 m to the east of the electrical substation. Its dimensions are 3m x 3m and it is oriented along the cardinal points, with a slight deviation to the east. In its upper part, there is a 0.3-0.6 m thick re-deposited layer with buried turf. In the northern part, under the turf, there is a 0.7 m layer of building rubble, under which a reinforced concrete structure is preserved, which is part of the foundations of the XXth (?) century brewery walls with limestone rubble. In the southern part, remains of concrete and walls made of shell rock and lime blocks on lime mortar with traces of plaster on the outside and lime plaster (whitewash?) on the inside are localized. The end wall of the structure is made of untreated limestone on lime mortar. The outer corner of the masonry is made of sawn limestone blocks, and the inner corner is made of limestone bricks. The end wall was sloped by limestone masonry, probably, to make an arch. There is no lintel between the end wall and the vault. Due to the remains of construction rubble and heavy debris, it was not possible to continue further studies here without the

appropriate equipment. The work was discontinued. The site can be additionally explored in the course of full-scale works. No materials of archaeological value were found, while some of the structures may be related to a late XVIII-XIX brewery built on the site of previous palace complex structures (Figure 45).

Pit 7. (Coordinates: N44.94773°, E034.11794)

Located 42 metres north-west of the intersection of Vorovskogo Street and Neapolskaya Street. It is oriented along the cardinal directions. The dimensions of the plot are 1x2m. Under the vegetable layer (0.1 m thick), there is 0.2 m thick light gray loam containing contemporary rubbish. Under it, a 0.03 to 0.05 m thick layer of asphalt can be traced. Under the asphalt, there is light grey loam with interlayers of limestone grit and medium to fine limestone. Also, in the central part of the pit, under the asphalt, there was found a XX century metal pipe going in the east-west direction. The layer filling the trench is mixed and modern rubbish is found along with XVIII-XIX century material. (Fig. 46-48a). In the light grey loam, with a total thickness of 1-1.2 m, there are fragments of Tartar-type tiles, fragments of ceramic vessels and smoking pipes (dated XVII-XIX cc.), etc. (Fig. 50-51) Under the light grey loam is dark brown sterile loam (0.3-0.4 m thick), lying on a dense sterile layer with pebbles (probably continental surface as in Pit 1). Due to the absence of archaeological material in this layer, work in this area was discontinued.

Pit 8. (Coordinates: N44.94741°, E034.11813°)

Located 16m north of the car service station on Neapolskaya Street. The dimensions are 2x2m. The top layer is re-deposited soil with turf that formed as a result of clearing of the parking area for the car service station. The layer thickness is 0.2 to 0.3 m. Underneath there is a layer of grey soil containing large amount of construction and domestic waste and asphalt. The layer thickness is 0.3 to 0.4m. Under the asphalt there is stone rubble resulting from the demolition of the wall which is traced under the stone rubble at the depth of 1.3 to 1.4 m. The wall is 0.8 m wide masonry made of

untreated stones on clay mortar, with stones hewn on the outer side. The wall runs in an east-west direction. To the north and south of the masonry, dark brown loam is traced, containing almost no finds. In general, however, XIX century material (fragments of pottery vessels, glass, fragments of Tartar-type tiles) was found in the stone rubble above the wall (Fig. 55). Due to the fact that the masonry runs exactly in the centre of the pit and further research was associated with a threat of disturbing the integrity of the discovered structure, the work at this site was discontinued (Figs. 49, 52-54).

Pit 9. (Coordinates: N44.94786°, E034.11764°)

Located 15m south of Pit 4. Dimensions are 2 x 3 m. The stratigraphic situation is the same as in Pit 4. Under the turf layer with a thickness of 0.1 to 0.15 m, there is a XX century cultural layer consisting of dark brown loam containing construction debris and asphalt. Under the asphalt layer there is a layer of grey loam with inclusions of charcoal, limestone grit and fragments of XIX century ceramics (tiles, fragments of vessels) (Fig. 61 and 62). Under this layer there is light grey sandy loam with clay admixture, as in pit 1. It is also sterile, its thickness is slightly lower, 0.7 m, under this layer there is brown-green sterile clay, continental surface. Control excavation of the continental clay was undertaken and no finds were discovered (Figures 56-60).

5. Conclusion

In November 2017, 9 pits with a total area of 50 square metres were dug in the study area. The main objective was to determine the presence/absence of cultural heritage objects in the study area. As a result of the field work, it was established that a cultural layer containing archaeological artefacts of the XVII-XIX centuries and architectural and hydraulic structures of the relevant period had been discovered in the study area. The depth of the cultural layer varies in different parts of the territory and can vary from 0.5 to 1 m. In view of this, and also taking into account the references to this place as the location of the Palace of Kalga-Sultan in the XVI-

XVIII centuries in written sources, we consider it necessary to include the site on the List of Newly Discovered Cultural Heritage (Archaeological) Sites. In the future, a full-scale archaeological study will need to be carried out, including the museumisation of any identified construction remains and the creation of an appropriate museum complex or inclusion of this site in Historical and Archaeological Museum-Reserve "Scythian Naples".

Coordinates of characteristic points along the boundary in the World Geodetic System (WGS-84) and SK-63 Coordinate System:

# of measured point on the boundary of the archaeological heritage site territory and the p	Coordinates of characteristic points in the World Geodetic System (WGS-84)		Coordinates of characteristic points in SK-63 Coordinate System	
	Northern latitude	Eastern longitude	Northern latitude	Eastern longitude
Point 1	44.94822°	034.11666°	4971009.32	5190939.643
Point 2	44.94816°	034.11654°	4971002.814	5190930.059
Point 3	44.94812°	034.11644°	4970998.503	5190922.091
Point 4	44.94719°	034.11691°	4970894.518	5190957.419
Point 5	44.94717°	034.11705°	4970892.107	5190968.43
Point 6	44.94719°	034.11763°	4970893.548	5191014.241
Point 7	44.94724°	034.11800°	4970898.607	5191043.536
Point 8	44.94779°	034.11844°	4970959.137	5191079.302
Point 9	44.94844°	034.11689°	4971033.459	5190958.211
Pit 1	44.94807°	034.11689°	4970992.34	5190957.509
Pit 2	44.94773°	034.11691°	4970954.529	5190958.443
Pit 3	44.94785°	034.11663°	4970968.242	5190936.573
Pit 4	44.94790°	034.11742°	4970972.734	5190999.014
Pit 5	44.94722°	034.11771°	4970961.5	5191005.927
Pit 6	44.94759°	034.11722°	4970938.553	5190982.642
Pit 7	44.94773°	034.11794°	4970953.142	5191039.729
Pit 8	44.94741°	034.11813°	4970917.324	5191054.117
Pit 9	44.94786°	034.11764°	4970961.5	5191005.927

The area of the newly discovered cultural heritage (archaeological) site is approximately 13,690 square metres (1.369 ha)

Holder of the Archaeological Excavation Permit,
Performer of the Works, Research Fellow, Candidate of
Historical Sciences

E. I. Seydaliev

Acting Director of the Federal State Budgetary
Research Institution "Crimean Institute Of
Archaeology of the RAS, Doctor of Historical
Sciences

B. V. Maiko

Method for determining the coordinates of characteristic (pivotal, angular) points on the archaeological heritage site boundary: portable global positioning device in the "WGS-84" coordinate system.

Description of boundaries:

Beginning of the segment	End of section	Distance (m)	Azimuth (°)
Point 1	Point 2	14	221.24
Point 2	Point 3	19	74.15
Point 3	Point 4	101	158.97
Point 4	Point 5	19	306.86
Point 5	Point 6	45	86.51
Point 6	Point 7	29	266.42
Point 7	Point 8	70	30.16
Point 8	Point 9	144	122.83
Point 9	Point 1	22	208.32

The total perimeter of the boundary of the newly discovered cultural heritage (archaeological) site is 463 metres.

A description of the archaeological material:

The archaeological material discovered during the 2017 archaeological reconnaissance consisted of numerous fragments of vessels from the XVII-XVIII centuries, as well as from modern times (see the respective section):

Pit 1. Layer 1. - 15 fragments of walls of red-clay Tatar-type tiles, tentatively dated to the XVII-XX centuries, 1 fragment of wall of beige clay vessel, tentatively dated to the XIX c., 1 fragment of cupolas of light red clay vessel, 6 fragments of walls of orange clay vessels and cupolas with oval handle, 1 fragment of cupolas and 3 fragments of walls of red clay vessels, 1 fragment of wall outside and inside covered with green glaze, tentatively dated to the XVII-XVIII centuries. A copper coin dated to the XIX century was also found.

Pit 2. Tile rubble. - 634 edge fragments and 325 wall fragments of red-clay Tartar-type tiles, tentatively dated to the XVII - XX centuries.

Pit 2. Layer under tile rubble. - 5 sections and 6 fragments of red-clay pipes, tentatively dated XVI-XVII centuries, 12 fragments of walls of red-clay "tartar" tiles, tentatively dated XVII-XX centuries, 1 fragment of red-clay plinth edge, 12 walls of red-clay pots, 7 walls of light-clay vessels covered with green glaze, 9 fragments of corolla and 5 fragments of cup walls with cobalt-painted "Iznikware" type decorations, tentatively dated XVII- XVIII centuries. 2 fragments of a glass bracelet with yellow accents, 1 pipe and 2 fragments of a Turkish type sleeve with a stamped ornament, 1 circular copper piece from a belt set (?), provisionally dated to the XVII-XVIII centuries. 4 white metal coins from the XVIII century.

Pit 3 - 22 fragments of walls of red-clay "tartar" type tiles, 1 fragment of wall and 1 fragment of edge of red-clay tiles outside and inside covered by green glaze, tentatively dated XVII-XX centuries, 2 fragments of spout of red-clay cuman, 1 archaeological complete profile of a light beige clay bowl, green-glazed on the outside and inside, 1 fragment of the corolla with the wall and the upper stick of the handle of a rose-clay jug, green-glazed on the outside and inside, 1 fragment of the bottom of a flat grey-clay pot, covered with light brown glaze on the inside and green on the outside, 1 fragment of the handle of a red-clay jug, covered with light green glaze with streaks of brown glaze, fragment of the bottom of a red-clay amphora, Secondary use as a grater, 1 iron horseshoe, tentatively dated to the end of the XVIII-XIX centuries, 1 pipe and 1 fragment of a Turkish type sleeve with stamped ornament, tentatively dated to the XVII-XVIII centuries, 1 copper coin from the reign of Catherine II.

Pit 4 - 1 fragment of an architectural stone detail, 1 fragment of the bottom of a flat red-clay pot, 1 fragment of a wall with an upper moulding

handles and 1 fragment of the corolla of beige clay vessels, externally and internally coated with green glaze, tentatively dated to the late XVIII-XIX centuries.

Pit 5 - 6 fragments of walls of red-clay "Tartar"-type tiles, tentatively dated to the XVII-XX centuries, 1 fragment of the bottom of a flat red-clay pithos, 1 fragment of the bottom of a conical beige-clay amphora, 1 fragment of the bottom of a flat red-clay amphora, 2 fragment from the wall of a yellow-clay amphora, 2 spouts of drain and 1 handle of a red-clay cuman, 7 fragments from the walls of red-clay pots coated with green glaze inside and outside, 1 fragment from the bottom of a flat beige-clay vessel, 1 fragment of the corolla of a red-clay bowl, inside and outside on the edge covered with brown glaze, inside ornament in the form of two parallel lines with green glaze, 1 fragment of the bottom on the ring tray of a white-clay dish, inside and outside covered with mother-of-pearl glaze, on the inside a floral ornament in blue, green and black, 2 fragments of a Turkish type sleeve with a stamped ornament, tentatively dated XVII-XVIII cc, 5 kopecks 1857

Pit 7 - 12 fragments of edges and 38 walls of red-clay "Tartar" type tiles, tentatively dated XVII - XX centuries, 1 fragment of pithos corolla, 1 fragment of corolla and handle of red-clay amphora, 6 fragments of walls and 1 fragment of handle of beige-clay amphora, 1 fragment of corolla of dark-clay pot, 4 fragment of walls, 1 fragment of rim and 1 fragment of handle of red-clay jugs, 10 fragments of walls of red-clay jugs outside covered with green glaze, 4 fragments of walls of beige-clay jugs outside covered with light-brown glaze, tentatively dated XVII-XVIII centuries.

Pit 8 - 11 fragments of walls of red-clay "Tartar" type tiles, tentatively dated to the XVII - XX centuries, 1 fragment of wall with lower handle of red-clay amphora, 1 fragment of wall and 1 fragment of handle of red-clay jug, 1 fragment from the wall of a beige clay bowl, internally glazed with light brown glaze, with underglaze painting in dark green glaze, tentatively dated to the XVII - XVIII centuries.


Pit 9 - 16 fragments of edges and 31 fragments of walls of red-clay "Tartar"-type tiles, tentatively dated XVII-XX cc., 1 fragment of wall with red-clay pipe edge, 1 fragment of flat red-clay amphora bottom, 1 fragment of red-clay jug rim outside and inside covered with green glaze, under which there is a white engobe, 1 fragment of the edge of a red-clay plate covered with a light brown glaze on the inside and a green glaze on the outside, 1 fragment of a Turkish-type sleeve with a stamped ornament, tentatively dated to the XVII - XVIII centuries.

Total: 188 items.

COIN AND SEAL INVENTORY ¹

#	# c/o	Photo of the find	Description	Weight (gr.)	Metal	Diameter (mm)	Note
1	18		Obverse: The side is heavily corroded Reverse: Side heavily corroded; Crimean Khanate, Bakhchisaray mint, 18th century.	0,86	Billon	15-16	The coin needs professional restoration
2	19		Obverse: The inscription: "[Khan Arslan Giray son of Devlet] Reverse: Inscription: "[Coined in Bakhchisaray], 1161" (1161 = 1748-1749 A.D.) Crimean Khanate, Arslan Giray (1748-1756 A.D.), Bakhchisaray mint, Beshlyk	0.68	Billon	15-16	
3	20		Obverse: Inscription: "[Kha]n Selim [Giray son of Kaplan]". Reverse: Inscription: "[Coined in Bakhchisaray, 1156]". (1156 = 1743-1744 AD). Crimean Khanate, Selim Giray II (1743-1748 AD), Bakhchisaray mint, 1182 Beshlyk	0,58	Billon	15-16	

¹ Coin attribution by A.V. Yakushechkin

4	21		<p>Obverse: The inscription: "[Khan Ar]slan [Giray son of Devlet]"</p> <p>Reverse: Inscription: "[Coined in Ba]khchi[saray], 1161" (1161 = 1748-1749 A.D.)</p> <p>Crimean Khanate, Arslan Giray (1748-1756 A.D.), Bakhchisaray mint, Beshlyk</p>	0,58	Billon	14-17	
---	----	---	---	------	--------	-------	--

15

5. An opinion on the scientific and historical significance of the site:

The urban area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan) is an interesting late medieval and modern object with preserved cultural layer and structures. Its study will add to the understanding of the history and topography of the Ak-Mosque, the nature of the material culture of the city's population, and the military, political and socio-economic history of the Crimean Khanate.

The newly discovered cultural (archaeological) heritage site, the Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the p Palace of Kalga-Sultan), is to be included on the List of newly discovered cultural (archaeological) heritage sites.

6. Information about the owner of the land:

1. Plot 1. **Cadastral number:** 90:22:010223:31

Land category: Settlement lands (residential areas). Sports. (Fig. 3. 1).

Land plot is located at: Republic of Crimea, Simferopol, Vorovskogo Street, in the area of house No. 21 (position as per GP-1).

2. Plot 2. **Cadastral number:** 90:22:010223:590

Land category: Settlement lands (residential areas) for individual housing construction. **Land plot is located at:** Republic of Crimea, Simferopol, Vorovskogo Street, near the house number 21 (position as per GP-1) (Fig. 3. 1).

3. Plot 3. **Cadastral number:** 90:22:010223:118

Land category: Land of settlements (residential areas) for individual housing construction Land plot located at the address:

Republic of Crimea, city of Simferopol, 21a Vorovskogo Street (Figure 3. 1).

4. Plot 4. **Cadastral number:** 90:22:010223:906

Land category: Land of settlements (residential areas) for individual housing construction Land plot is located at:

Republic of Crimea, Simferopol, 21 Vorovskogo Street, Simferopol (pos. as per GP-2). (Fig. 3. 1).

7. Information on the land plot user:

1. Plot 1. **Cadastral number:** 90:22:010223:31

Land category: Settlement lands (residential areas). Sports. **Land plot located at the address:** Republic of Crimea, Simferopol, Vorovskogo Street, near house number 21 (pos. as per GP-1).

2. Plot 2. **Cadastral number:** 90:22:010223:590

Land category: Settlement lands (residential areas) for individual housing construction. **Land plot is located at:** Republic of Crimea, Simferopol, Vorovskogo Street, near house number 21 (pos. as per GP-1).

3. Plot 3. **Cadastral number:** 90:22:010223:118

Land category: Land of settlements (residential areas) for individual housing construction. Land plot is located at:

Republic of Crimea, Simferopol, 21a Vorovskogo Street.

4. Plot 4. **Cadastral number:** 90:22:010223:906

Land category: Land of settlements (residential areas) for individual housing construction. Land plot is located at:
Republic of Crimea, Simferopol, 21 Vorovskogo Street (pos. as per GP-2).

8. The character of today's use:

At present, the area of the newly discovered site is partially unused, with one of the plots (21a Vorovskogo St.) fenced off.

9. Legal regime for the usage of the land plot within the boundaries of which the newly discovered cultural heritage site is located (protection zone, nature reserve, etc.): not established.

10. Historical information (history of discovery; who and when carried out archaeological reconnaissance and excavations; place of storage):

It should be noted that prior to this field studies, the area at the indicated address had not been explored archaeologically. The nearest excavations in the study area were at the site of the ancient settlement of Scythian Naples and at the Petrovskie Vysoty massif.

As a result of archival and bibliographic research the following information regarding the study area was gathered.

The historical sources containing information about the Palace of Kalga-Sultan are quite numerous. Among them, of particular interest are descriptions of those writers who were in Crimea themselves. The Palace of Kalga-Sultan was described by such writers as Evliya Chelebi, Charles de Peyssonnel, Abri de la Motere, Christophe Manstein and others. Much was written about the palace by later authors.

One of the earliest mentions of the palace, dating from the first half of the 17th century, belongs to a Dominican monk, Jean de Luc, who visited the Crimea in 1625 (or 1633). He notes: "The Khan has five palaces, the Sultan [*i.e. Kalga-Sultan - translator's note*] has two. The palaces of the Sultan (*i.e. Kalga-Sultan*) are in the Ak-Mosque".

The information of the famous Turkish traveller of the 17th century Evliya Celebi, who devoted a separate chapter to the Palace of Kalga-Sultan in his "Book of Travels", is rather valuable. According to him, the palace complex had "200 two-storey buildings made of stone, with kyuryunyusha (chambers for the Divan meetings - ed.), with bright and luxurious rooms. The palace, though, was not as splendidly appointed and decorated as the khan's palace in Bakhchisaray. In the wide square of this palace there is a mosque with one minaret". The mosque was named after its builder, the Crimean Khan Mengli Giray, it was not big, covered with tiles, with one stone minaret of the old design.

Noteworthy is the mention of the palace made by a Russian official in 1787: "The Great Palace of Kalga-Sultan is not itself big in size and is occupied by our soldiers, who have already managed to destroy some of the fountains decorating his palace, and cut down trees. Behind the fence of the palace there was a fountain which flowed out of a solid stone wall, and further away there were squalid tiny houses of Tartars. Behind the Palace of Kalga-Sultan, not far from Salgir, there is a cemetery with a white fence in the midst of it and canopy with a green sign above the fence, under which a mullah is sitting all day long whispering prayers in honour and glory of some saint buried here".

Sometime later, in the first half of the 19th century, the location of the former Palace of Palace of Kalga-Sultan was indicated on the plans by Blaramberg and Dubois de Monpere.

Subsequent researchers wrote the following about the palace: "Near the rock itself, above the Petrovsky fountain, and near the road, the brewery of

Weisbord stands. <...> on this spot, where the brewery now is, was formerly the Palace of Kalga-Sultan ". There is also a handwritten plan of the site showing "Sultan Saray" with "Weisbord brewery" located there.

Thus, the former Weisbord brewery, later the Simferopol Brewery, which was located at 21 Vorovskogo Street, was one of the landmarks indicating the palace location. According to the recollections of the brewery workers, they were stunned by huge cellars, which had remained actually untouched by the destruction of the factory premises during the liquidation of the brewery..

In the course of the present archaeological study, 9 pits were dug. As a result of the field work, it was found that the study area has a cultural layer containing archaeological artefacts from the XVII-XIX centuries and architectural and hydraulic structures of the relevant period.

11. Bibliography, archival sources:

1. Bocharov S.G. Ak-Mechet: Historical Topography of the City of the Crimean Khanate // Medieval Turkic-Tatar States. 2015. №7. P. 5-10.
2. Zaytsev Y.P. Scythian Naples (II century BC - III century AD) / Monograph. - Simferopol: Universum, 2003. – 212 pages
3. Manstein's Notes on Russia. 1728-1744 // Translated from the original manuscript by Manstein. - SPb., 1875. – 378 pages
4. Ivanić M. Crimean Tatar embassies to the Vienna court in 1598-1682 (from the history of Crimean Tatar diplomacy in the XVI-XVII centuries). Turcica et Ottomanica: Collection in honour of M. S. Meyer's 70th birthday. - M, 2006. - p. 226- 237.
5. Historic and Architectural Master Plan of Simferopol - Available at: <http://sim.gov.ua/userfiles/file/istarkplan.pdf>

6. Kondaraki V. H. A universal description of the Crimea. Parts. 1-17. - Nikolaev - SPb., 1873-1875.
7. Crimea. Guidebook / Edited by L.S. Vagin, E.V. Wolf, P.A. Dvoichenko and V.V. Sokolov. Sokolov. - Simferopol, 1923.
8. Lashkov F. Historical Sketch of Crimean Tatar Land Tenure. - Simferopol, 1997. – 203 pages
9. Moskvich G. Illustrated practical guide to the Crimea. Tenth edition. - Odessa, 1901.
10. Description of the Perekop and Nogai Tatars, Circassians, Mingrelians and Georgians by Jean de Luc, a monk of the Dominican Order (1625) // ZOIID. - Vol. 11 - Odessa, 1879. – pages 473-493.
11. Pallas P. S. Observations made during his travels in the southern provinces of the Russian state in 1793-1794 / Per. - M.: Nauka, 1999, 246 pages
12. Ch. de Peyssonel Note on Small Tartary / Translated from French by V. Lotoshinsky, introduction and notes by V. Gribovsky. - Dnepropetrovsk: Gerda, 2009. – 80 pages
13. The third study tour of Simferopol Men's Gymnasium. Report compiled by order of the Pedagogical Council by F. Lashkov. - Simferopol, 1890.
14. Evliya Çelebi, Book of Travels. Crimea and the Adjacent Regions. Extracts from the works of the Turkish traveller of the XVII century / Translation and commentary by E. V. Bakhrevsky. - Simferopol: DOLYA, 2008. - 172 pages
15. J. de Blaramberg. De la position de Trois fortresses Tauro-Scythes, don't parle Strabon, avec cartes, plans, copies d'inscriptions et dessins d'apres des mabres antiques.- Odessa, 1831. Published in the book: Y. P. Zaitsev

Scythian Naples (II century B.C. - III century A.D.) / Monograph. - Simferopol: Universum, 2003, 212 pages

16. De La Motraye. Voyage du Sr. A. De La Motraye en Europe, Asie et Afrique. Tome Second. - La Haye, 1727.
17. Dubois de Montpereux F. Voyage autour du Caucase, chez les Tcherkesses et les Abkhases, en Georgie, en Armenie, en Crimee: A 6 v.- Paris, 1843,- V, 6.

12. Recommendations on the mode of usage of the land plot within the boundaries of which the archaeological site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" is located:

A possibility is to be provided for conducting archaeological field work in accordance with the procedure established by Federal Law No. 73-FZ "On Cultural Heritage (Historical and Cultural Monuments) Sites of the Peoples of the Russian Federation" dated 25.06.2002 and earth, construction, and reclamation works and general labour activities, provided that the newly discovered archaeological heritage site is preserved and that citizens have access to such archaeological heritage site.

1. The following should be prohibited:
 - 1.1 Performance of earthworks or construction or reclamation works, general labour activities or other works without the approval of the state body for the protection of cultural heritage.
 - 1.2 Disturbance of turf and earth excavation in previously unexcavated and undisturbed areas, except for activities related to archaeological study and activities aimed at the conservation and scientific study of archaeological heritage sites.
 - 1.3 Conducting archaeological studies on an archaeological heritage site territory without a (archaeological excavation) permit issued by the Ministry of Culture of the Russian Federation to the researcher.
 - 1.4 The use of metal detectors, GPRs and other instrumental search tools aimed at identifying and collecting archaeological material.

- 1.5 Discarding of waste (creation of dumps) on archaeological heritage sites.
2. The following should be allowed:
 - 2.1 Activities related to archaeological studies and scientific study of archaeological heritage sites shall be carried out under the laws currently in force.
 - 2.2 Conservation and museumisation of archaeological heritage sites and other activities that are necessary to ensure the conservation of archaeological heritage sites in their historical and landscape setting, as approved by the state authority for the protection of cultural heritage.
 - 2.3 Use, in accordance with Article 45.2 of Federal Law No. 73-FZ "On Cultural Heritage Sites (Historical and Cultural Monuments) of the Peoples of the Russian Federation" dated 25.06.2002, of special technical means for search and/or excavation machines to locate archaeological heritage sites and/or archaeological items only during archaeological fieldwork carried out on the basis of a (archaeological excavation) permit.

Date: 19.02.2018

Holder of the Archaeological Excavation Permit, Performer of the Works, Research Fellow, Candidate of Historical Sciences

E. I. Seydaliyev

Acting Director of the Federal State Budgetary Research Institution "RAS Crimean Institute of Archaeology", Doctor of Historical Sciences

B. V. Mayko

Exhibit B

State Committee of Cultural Heritage Protection of the Republic of Crimea, Order No. 41,
27 March 2018

(translation)

Translation

**State Committee of Cultural Heritage Protection of the Republic of Crimea, Order No. 41,
27 March 2018.**

State Committee for the Protection of Cultural Heritage of the Republic of Crimea

27 March 2018

#41

*On entry of the identified object of archeological heritage
into the Register of identified objects of cultural heritage
of the Republic of Crimea and on the establishment of
boundaries and modes of using the territory thereof*

In accordance with Articles 3.1, 16.1 and 45.1 of Federal Law No.73 dated 25.06.2002 “On objects of cultural heritage (monuments of history and culture) of the peoples of the Russian Federation, Order No.2328 dated 01.09.2015 “On the establishment of register of information about archeological heritage objects not suitable for publication”, based on the excerpt from Minutes No. 04-18 dated 23 March 2018 of the meeting of the Scientific and Methodological Council on Cultural Heritage under the auspices of the State Committee for the Protection of Cultural Heritage of the Republic of Crimea and documentation on the identified object of cultural (archeological) heritage “Section of the urban buildup area of Ak-Mosque, XVII-XVIII centuries (probable location of the Kalga Sultan Palace” received from FGBUN “RAS Institute of Archeology of Crimea” (D.Sci. V.V. Maiko) and individual person, holder of Open List No. 2355 of 30.10.2017, C.Sci. E.I. Seidaliev,

I HEREBY ORDER AS FOLLOWS:

1. Enter the identified object of cultural (archeological) heritage “Section of the urban buildup area of Ak-Mosque, XVII-XVIII centuries (probable location of the Kalga Sultan Palace” located in Simferopol, Republic of Crimea, into the Register of identified cultural heritage objects of the Republic of Crimea.
2. Establish the boundaries of the territory of the identified object of cultural (archeological) heritage and the mode of usage of the land plot within whose boundaries the identified object of cultural (archeological) heritage is located, according to the Annex to this Order (not for publication).
3. Assign control over the implementation of this Order to Deputy Chairman of the State Committee for the Protection of Cultural Heritage of the Republic of Crimea V.G. Zarubin.

Chairman

(signature)

S.A. Efimov

Exhibit C

RAS Crimean Institute of Archeology, Research and planning documentation for the boundary modification project in relation to the territory of newly discovered cultural heritage site “Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)”

(translation)

Translation

RAS Crimean Institute of Archeology, Research and planning documentation for the boundary modification project in relation to the territory of newly discovered cultural heritage site “Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)”.

FEDERAL STATE BUDGETARY RESEARCH INSTITUTION "CRIMEAN
INSTITUTE OF ARCHAEOLOGY OF THE RUSSIAN ACADEMY OF
SCIENCES"

Main State Registration Number 1159102130660 TIN 9102201070

RESEARCH AND PLANNING DOCUMENTATION

**FOR THE BOUNDARY MODIFICATION PROJECT IN RELATION TO THE
TERRITORY OF**

**newly discovered cultural heritage site “Urban Area of Ak-Mosque, XVII - XVIII
centuries (possible site of the Palace of Kalga-Sultan)”.**

Developed pursuant to
Resolution of the Ministry of
Culture of the Russian
Federation
No. 1745 dated 04 June 2015

1. Information on the site name:

"Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)".

2. Dating of the site:

XVII-XVIII centuries.

3. Location of the site (region, area, rural district, locality, peculiarities of the location):

19-23 Vorovskogo Street, city of Simferopol, the Republic of Crimea.

4. Brief description of the site (boundaries, composition of the cultural layer, major finds, losses that have changed the original appearance of the site):

The territory of the cultural heritage site is wasteland in the mouth of Petrovskaya Balka ("Petrovskaya Ravine") located at 19-23 Vorovskogo Street. The wasteland is bounded to the north by Vorovskogo Street and to the east and south by Petrovskaya Balka Street and to the west by the cliffs of Petrovskiye Cliffs. The wasteland is a relatively flat site with numerous traces of anthropogenic influence, which is explained by the existence of Simferopol Brewery on this territory until the 80s of the XX century, when, following the construction of a new beer and soft drinks plant, it was closed down and dismantled. Within the boundaries of the

examined territory there are numerous potholes and cross-ditches, which formed as a result of extraction of ferrous and non-ferrous metals by local residents, and a considerable amount of construction and household waste. The terrain descends gently from south to north. In the western part of the site, there is a water source (spring) in the wall, which may be identified as the source for the fountain that existed in the territory of the Palace of Kalga-Sultan and subsequently in the territory of the brewery. It is possible that the same spring is referred to as "Petrovsky Fountain" in late written and graphic accounts.

Boundary coordinates of the cultural heritage site

Item	Coordinates (WGS-1984)	
	North latitude	East longitude
Point	44.94822°	034.11666°
Point 2	44.94816°	034.11654°
Point 3	44.94812°	034.11644°
Point 4	44.94719°	034.11691°
Point 5	44.94717°	034.11705°
Point 6	44.94719°	034.11763°
Point 7	44.94724°	034.11800°
Point 8	44.94779°	034.11844°
Point 9	44.94844°	034.11689°

In June 2019, the Federal State Budgetary Research Institution "Crimean Institute of Archaeology of RAS" conducted field archaeological studies to define more precisely the boundaries of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" located at 19-23 Vorovskogo Street, Simferopol.

Three pits were dug in the south-eastern part of the land plot located at 21a Vorovskogo Street, Simferopol, with cadastral number 90:22:010223:118. The north-western part of the land plot was occupied by tanks of the Simferopol Beer and Soft Drinks Plant.

Pit No. 1. (N44.947379°, E34.117632°). Was excavated one metre from the north-eastern boundary of the site and is oriented along the NE-SW line. Dimensions: 2x2 m, depth: 2.52 to 2.90 m. A (0.2 to 0.28 m) layer of dark grey loam containing limestone inclusions and modern-day debris, tile fragments, sporadic fragments of glazed vessels, and isolated animal bones, was found under the turf (of up 0.12 m). This layer is cut through by a 0.6m wide and 0.4m deep trench going down from the modern-day surface, which is oriented along the NE-SW line and in which four iron water pipes were laying. Thin (0.02 m) interlayers of limestone grit and light grey loam with large amounts of sand and modern-day debris (0.05 m) were discovered below. This level was overlapping layers of grey (0.42 to 0.6 m) and light brown (0.05 to 0.4 m) loam containing isolated limestones, tile fragments, sporadic fragments of pottery vessels, fragments of clay smoking pipes (2 items) and animal bones. Below, there was a layer of limestone grit with sand clay (0.12 to 0.39 m) and, below that layer, light brown

loam (0.38 to 0.59 m) with numerous fragments of roof tiles, fragmented ceramic smoking pipes of the first quarter of the 19th century (3 pcs.), and small fragments of glass bottles. The latter one was underlain by a layer of dark loam (0.12 to 0.44 m). In the stratigraphic succession of N - E and N - W sides, contours of (0.38 to 0.45 m deep) holes dug from the surface were detected, on which modern-day debris were found.

Pit No. 2. (N44.947258° E34.117715°). Was excavated 1m from the eastern boundary of the site and is orientated along the NE-SW line. Dimensions: 2x2 m, depth: 2.68 to 2.9 m. The top layer consists of dark soil with large amounts of modern-day construction and household waste (0.12 to 0.20 m thick), which overlapped the buried turf (0.08 m) and a (0.24 to 0.28 m) layer of dark soil with modern-day debris overlying asphalt (0.12 m). Below the asphalt, there were detected layers of light brown (0.12 to 0.14 m) and dark brown (0.16 m) loam. Below them, there were layers of sandy loam with small inclusions of limestone (0.10 to 0.18 m), light yellow (0.7 to 0.12 m) and dark loam with limestone grit (0.12 to 0.22 m), dark loam with small tile fragments (0.6 to 0.78 m), dark soil with limestone grit (0.08 to 0.10 m), grey loam (0.30 to 0.32 m) with limestone grit, fragments of 19th century glass bottles, a fragment of a ceramic smoking pipe, a layer of limestone grit (0.04 to 0.06 m), dark soil (0.20 to 0.36 m). A 0.28 m wide trench was dug in the latter, in which a 0.12 m diameter ceramic water pipe had been laid (which was oriented along the NW-SE line). The joints of the pipe sections were coated with lime mortar. There were small limestones around the pipe and (0.08 m) fine limestone filler below the pipe in the trench.

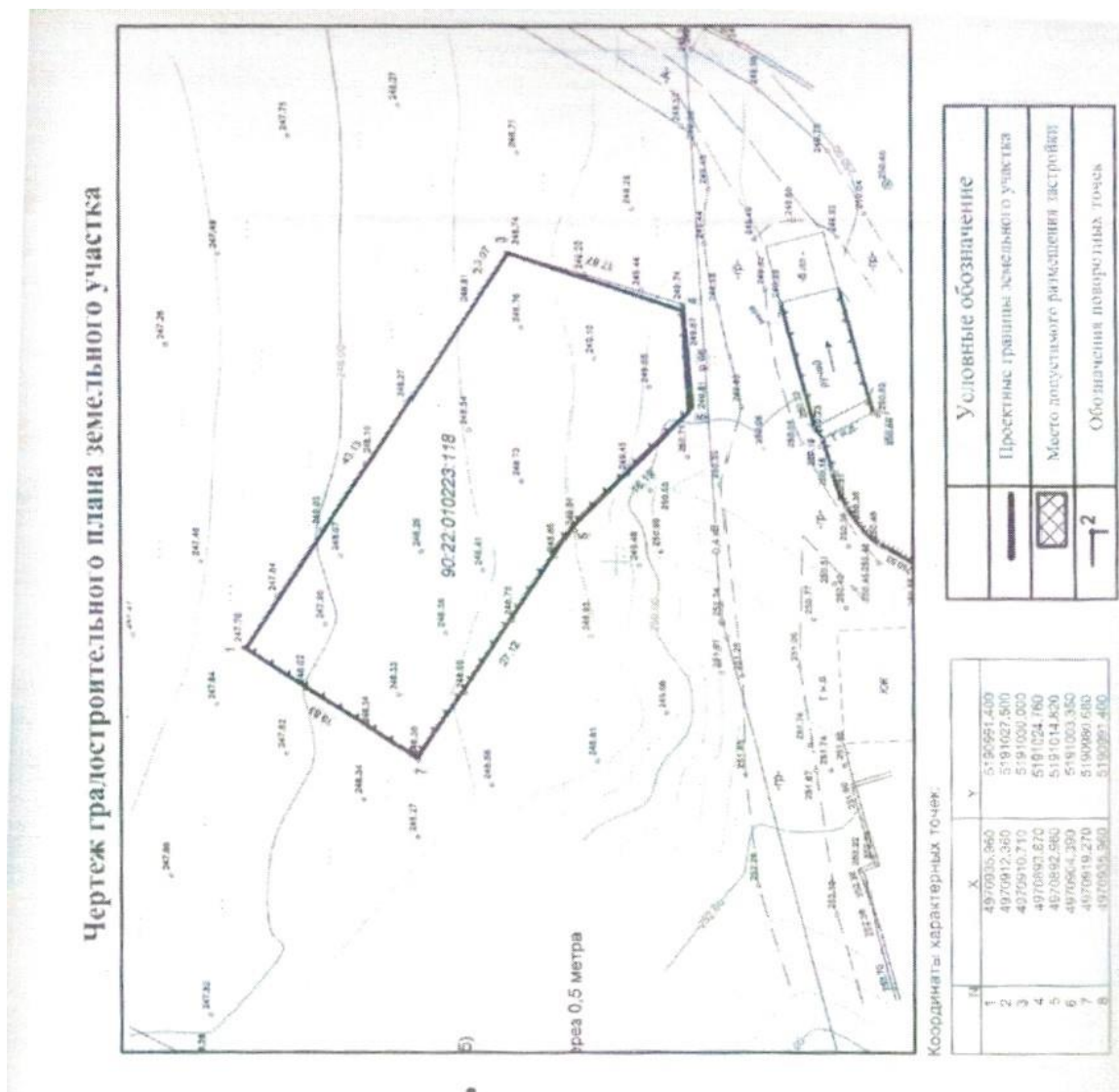
Pit No. 3 (N44.947241°, E34.117571°). Was excavated 4.7 m from the eastern boundary of the site and is oriented along the NE-SW line. Dimensions: 2x2 m, depth: 3.91 m to 4.05 m. Under (0.14 to 0.2 m thick) asphalt, layers of dark grey loam (0.12 to 0.2 m), light sandy clay with crushed stone and limestone grit (0.37 to 0.38 m), and brown loam (0.88 to 0.98 m) were lying sequentially. Those layers contained modern-day rubbish and small fragments of tiles. Below, a (1.18 to 1.42 m) layer of brown clay loam with tile fragments and fragments of pottery vessel walls covered with dark green glaze (2 items) was lying. Under that layer, there was dark brown homogeneous soil (0.88 to 0.91). A fragment of ceramic pipe, 0.12 m in diameter, was recorded in the northern face at a depth of 2.51 m. In the southern side wall, a 0.58 m wide and 1.94 m deep trench oriented along the NW-SE line was discovered, which had been dug from the surface overlain by asphalt. Isolated large limestones were found in the trench. Modern-day rubbish was found in the trench fill and between masonry stones. A 1.3m deep and 1.2 m wide hole with a massive concrete base of a structure was discovered in the north-eastern side wall.

Proceeding from the pitting conducted in 2019, it can be argued that no remains of structures dating earlier than the first half of the XX century were found on the land plot located at 21a Vorovskogo Street, Simferopol, with cadastral number 90:22:010223:118. The only remains of the cultural layer of the end of XVIII - first half of XIX century are some fragments strongly mixed with rubbish of the first half of the XX century. These fragments of the cultural layer in Pit 5 of 2017 and Pits 1 through 3 of 2019 were examined in their entirety.

Based on archival data and the 2019 pitting, the area of the land plot located at 21a Vorovskogo Street, Simferopol, with cadastral number 90:22:010223:118, can be excluded

from the territory of the newly discovered cultural heritage object "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)".

**The turning point coordinates of the land plot located at
21a Vorovskogo Street, Simferopol, cadastral number 90:22:010223:118**



*Urban development plan of the land plot

Proposed coordinates of the cultural heritage site boundaries

Item	Coordinates (WGS-1984)	
	Northern latitudes	East longitude
Point 1	44.94822°	034.11666°
Point 2	44.94816°	034.11654°
Point 3	44.94812°	034.11644°
Point 4	44.94719°	034.11691°
Point 5	44.94717°	034.11705°
Point 13	44.56502°	034.07279°
Point 14	44.56507°	034.07175°
Point 10	44.56512°	034.07225°
Point 11	44.56505°	034.07374°
Point 12	44.56504°	034.07402°
Point 6	44.94719°	034.11763°
Point 7	44.94724°	034.11800°
Point 8	44.94779°	034.11844°
Point 9	44.94844°	034.11689°

Modified area of the newly discovered cultural heritage (archaeological) site is 12, 681 square metres.

Proposed description of the cultural heritage site boundaries

Beginning of section	End of section	Distance (m)
Point 1	Point 2	14
Point 2	Point 3	19
Point Z	Point 4	101
Point 4	Point 5	19
Point 5	Point 13	16.19
Point 13	Point 14	27.12
Point 14	Point 10	19.83
Point 10	Point 11	43.13
Point 11	Point 12	3.07
Point 12	Point 6	17.87
Point 6	Point 7	29
Point 7	Point 8	70
Point 8	Point 9	144
Point 9	Point 1	22

The proposed total perimeter of the newly discovered cultural heritage (archaeological) site territory boundary is 324 m.

Boundaries of the cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" and boundaries of the land plot territory to be excluded from the territory of the cultural heritage site

Director of FSBIS "RAS Crimean Institute of Archaeology"

V. V. Mayko

Границы объекта культурного наследия «Участок городской застройки Ак-Мечети, XVII-XVIII вв. (место возможного расположения дворца Калга-Султана)» и границы территории земельного участка, предполагаемого к вычленению из территории данного объекта культурного наследия



Директор ФГБУН
Институт археологии Крыма РАН

В.В. Майко

Exhibit D

RAS Crimean Institute of Archeology, Report of V.V. Masyakin on archaeological explorations in the territory of the newly discovered cultural heritage site “Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)” at 21 Vorovskogo Street, city of Simferopol, the Republic of Crimea in 2019

(excerpt, translation)

**Extract
Translation**

RAS Crimean Institute of Archeology, Report of V.V. Masyakin on archaeological explorations in the territory of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" at 21 Vorovskogo Street, city of Simferopol, the Republic of Crimea in 2019.

**FEDERAL STATE BUDGETARY RESEARCH INSTITUTION
"CRIMEAN INSTITUTE OF ARCHAEOLOGY OF THE RUSSIAN ACADEMY OF
SCIENCES"**

Approved by

Institute Director _____

V. V. Mayko

V. V. Masyakin

REPORT

**on archaeological explorations in the territory of the newly discovered
cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries
(possible site of the Palace of Kalga-Sultan)" at 21 Vorovskogo Street, city of
Simferopol, the Republic of Crimea in 2019**

(Archaeological Excavation Permit No. 0600-2019)

Simferopol, 2019

ABSTRACT

V. V. Masyakin. Report on archaeological reconnaissance on the territory of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" at 21 Vorovskogo Street, city of Simferopol, the Republic of Crimea, in 2019.

The report contains the results of archaeological reconnaissance (pitting) on the territory of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" at 21 Vorovskogo Street, city of Simferopol, the Republic of Crimea, which were conducted in June and October 2019. A total of 7 pits with a total area of 20 sq. m. were explored. The purpose of the reconnaissance was to define more precisely the boundaries of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan) located at 19-23 Vorovskogo Street, Simferopol.

TABLE OF CONTENTS

ABSTRACT	2
TABLE OF CONTENTS	3
INTRODUCTION	4
Brief historical and geographical information.....	5
Description of the area under study.....	6
ARCHAEOLOGICAL STUDIES (PITS 1 THROUGH 7)	8
Archaeological research (pitting) on the land plot located at 21a Vorovskogo Street, Simferopol, with cadastral number 90:22:010223:118.....	8
Archaeological reconnaissance (pitting) on the land plot at Vorovskogo Street, near house number 21, Simferopol, with cadastral number 90:22:010223:590.....	8
CONCLUSION	13
List of references	13
Annex 1. Storage of finds certificate and items acceptance report.....	14
Field inventory of finds	14
Collection inventory of finds	16
Illustrations	17
Archaeological excavation permit	58

INTRODUCTION.

In June 2019, under Contract No. 58 dated 25 June 2018 entered into between O. S. Shayarliyev, citizen of Russia, and FSBRI "Crimean Institute of Archaeology of the RAS", pursuant to Archaeological Excavation Permit No. 0600-2019 issued on 31 May 2019 in the name of a junior researcher of the Institute, V. V. Masyakin, field archaeological studies were carried out to define more precisely the boundaries of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the palace of Palace of Kalga-Sultan) located at 19-23 Vorovskogo Street, Simferopol.

In October 2019, under Contract No. 137 dated 02 September 2019 entered into between S. V. Suvorova, citizen of Russia, and FSBRI "Crimean Institute of Archaeology of the RAS", archaeological studies were carried out in the territory of the land plot located at 21 Vorovskogo Street, Simferopol, cadastral number 90:22:010223:590, with an area of 1,000 square meters.

The employees of the FSBRI "Crimean Institute of Archaeology of the RAS" V. V. Masyakin, A. S. Devaev, A.A. Lysenko, A.E. Masyakin, A.S. Devaev, V.A. Lysenko, A.E. Solomonenko, and V. A. Tikhomirov took part in the works. The elevations are given in the Baltic Height System.

BRIEF HISTORICAL AND GEOGRAPHICAL INFORMATION

As a result of archival and bibliographic research the following information regarding the territory under study was gathered.

The historical sources containing information about the palace of Palace of Kalga-Sultan are quite numerous. Among them, of particular interest are descriptions of those writers who were in Crimea themselves. The palace of Palace of Kalga-Sultan was described by such writers as Evliya Chelebi, Charles de Peyssonnel, Abri de la Motere, Christophe Manstein and others. Much was written about the palace by later authors.

One of the earliest mentions of the palace, dating from the first half of the 17th century, belongs to a Dominican monk, Jean de Luc, who visited the Crimea in 1625 (or 1633). He notes: "The Khan has five palaces, the Sultan (i.e. Kalga-Sultan (translator's note)) has two. The palaces of the Sultan (i.e. Kalga Sultan) are in the Ak-Mosque".

The information of the famous Turkish traveller of the 17th century Evliya Celebi, who devoted a separate chapter to the Palace of Kalga-Sultan in his "Book of Travels", is rather valuable. According to him, the palace complex had "200 two-storey buildings made of stone, with kyuryunyusha (chambers for the Divan meetings - ed.), with bright and luxurious rooms. The palace, though, was not as splendidly appointed and decorated as the khan's palace in Bakhchisaray. In the wide square of this palace there is a mosque with one minaret". The mosque was named after its builder, the Crimean Khan Mengli Giray, it was not big, covered with tiles, with one stone minaret of the old design.

Noteworthy is the mention of the palace made by a Russian official in 1787: "The Great Palace of Kalga-Sultan is not itself big in size and is occupied by our soldiers, who have already managed to destroy some of the fountains decorating his palace, and cut down trees. Behind the fence of the palace there was a fountain which flowed out of a solid stone wall, and further away there were squalid tiny houses of Tartars. Behind the Palace of Kalga-Sultan, not far from Salgir, there is a cemetery with a white fence in the midst of it and canopy with a green sign above the fence, under which a mullah is sitting all day long whispering prayers in honour and glory of some saint buried here".

Sometime later, in the first half of the 19th century, the location of the former Palace of Kalga-Sultan was indicated on the plans by Blaramberg and Dubois de Monpere.

Subsequent researchers wrote the following about the palace: "Near the rock itself, above the Petrovsky fountain, and near the road, the brewery of Weisbord stands. <...> on this spot, where the brewery now is, was formerly the Palace of Kalga-Sultan". There is also a handwritten plan of the site showing "Sultan Saray" with "Weisbord brewery" located there.

Thus, the former Weisbord brewery, later the Simferopol Brewery, which was located at 21 Vorovskogo Street, was one of the landmarks indicating the palace location. According to the recollections of the brewery workers, they were stunned by huge cellars, which had remained actually untouched by the destruction of the factory premises during the liquidation of the brewery.

Of particular note are the cartographic data obtained by the Museum of the History of Simferopol from the military archives and provided to the Crimean Institute of Archaeology of the Russian Academy of Sciences for examination.

The territory of the studied land plots located at 21-21a Vorovskogo Street, Simferopol, is within the boundaries of the territory of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)". The boundaries of this cultural heritage site located at 19-23 Vorovskogo Street, Simferopol, were determined on the basis of archaeological reconnaissance involving pitting carried out in November 2017 by a joint archaeological expedition of FSBRI "Crimean Institute of Archaeology of the RAS" and State-Funded Educational Institution "Crimean Engineering and Pedagogical University" led by E. I. Seydaliev.

A DESCRIPTION OF THE AREA UNDER STUDY

The territory of the cultural heritage site is wasteland in the mouth of Petrovskaya Balka ("Petrovskaya Ravine") located at 19-23 Vorovskogo Street. The wasteland is bounded to the north by Vorovskogo Street and to the east and south by Petrovskaya Balka Street and to the west by the cliffs of Petrovskiye Cliffs. The wasteland is a relatively flat site with numerous traces of anthropogenic influence, which is explained by the existence of Simferopol Brewery on this territory until the 80s of the XX century, when, following the construction of a new beer and soft drinks plant, it was closed down and dismantled. Within the boundaries of the examined territory there are numerous potholes and cross-ditches, which formed as a result of extraction of ferrous and non-ferrous metals by local residents, and a considerable amount of construction and household waste. The terrain descends gently from south to north. In the western part of the site, there is a water source (spring) in the wall, which may be identified as the source for the fountain that existed in the territory of the Palace of Kalga-Sultan and subsequently in the territory

of the brewery. It is possible that the same spring is referred to as "Petrovsky Fountain" in late written and graphic accounts.

The boundaries of the cultural heritage site located at 19-23 Vorovskogo Street, Simferopol, were determined on the basis of archaeological reconnaissance involving pitting carried out in November 2017 by a joint archaeological expedition of FSBRI "Crimean Institute of Archaeology of the RAS" and State-Funded Educational Institution "Crimean Engineering and Pedagogical University" led by E. I. Seydaliev.

Pursuant to Order of the State Committee for the Protection of Cultural Heritage of the Republic of Crimea No. 41 dated 27 March 2018, the cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" was included in the list of newly discovered cultural heritage sites of the Republic of Crimea.

In September 2018, the FSBRI "Crimean Institute of Archaeology of the RAS" received archival materials consisting of a land plot development plan in relation to the land plot allocated to Simferopol Beer and Soft Drinks Plant "Krymbrodrest", which was prepared on 30 June 1952 by Bystritsky, surveying engineer of Simferopol OKH. According to the plan, there were tanks "M" and "L" and an unsheltered warehouse of the brewery on the territory of the land plot with cadastral number 90:22:010223:118 at 21a Vorovskogo Street. Those structures, as per the plan, were occupying a large part of the land plot with cadastral number 90:22:010223:118. In the immediate vicinity of the land plot, there were tanks "K", "I", "P", a shed and site No. 1 of the brewery (Fig. 3).

The land improvement works carried out by the owner of the land plot with cadastral number 90:22:010223:118 in the second half of September 2018 confirmed that remains of the brewery's ruined cistern "L", divided by partitions into several sections, were present in the north-western part of the land plot. In the course of the works, a completely preserved tank "M" abutting tank "L" was found.

On 26 and 27 February 2019, the owner of the land plot performed further land improvement works on their land plot at 21a Vorovskogo Street, cadastral number 90:22:010223:118, for the purpose of soil movement. The examination of the land plot made on 28 February 2019 revealed that the two ruined brewery tanks previously discovered in the western part of the land plot had been extracted from the ground using an excavator and a crane (Fig.4). Furthermore, another similar tank was found in the central part of the land plot, which had also been extracted from the ground. In the northern and southern parts of the land plot, ground had been levelled to a depth of 3.10 m, the base of all three found brewery tanks, using earthmoving equipment. The displaced soil is grey loam with construction and household debris,

asphalt and small stones. No archaeological finds were discovered on visual inspection of the entire displaced soil.

ARCHAEOLOGICAL STUDIES (PITTING) ON THE LAND PLOT LOCATED AT 21 VOROVSKOGO STREET, SIMFEROPOL, CADASTRAL NUMBER 90:22:010223:118.

In June 2019, under Contract No. 58 dated 25 June 2018 between O. S. Shayarliyev, citizen of the Russian Federation, and FSBRI "Crimean Institute of Archaeology of the RAS", pursuant to Archaeological Excavation Permit No. 0600-2019 issued on 31 May 2019 in the name of a junior researcher of the Institute, V. V. Masyakin, field archaeological studies were carried out to define more precisely the boundaries of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan) located at 19-23 Vorovskogo Street, Simferopol.

Three 2 x 2 m pits were dug in the south-eastern part of the land plot located at 21a Vorovskogo Street, Simferopol, with cadastral number 90:22:010223:118. The north-western part of the land plot was occupied by tanks of the Simferopol Beer and Soft Drinks Plant, which made the digging of pits there impossible (Fig. 1; 2; and 5).

Pit No. 1. (N44.947379°, E34.117632°). Was excavated one metre from the north-eastern boundary of the site and is oriented along the NE-SW axis. Dimensions: 2x2 m, depth: 2.52 to 2.90 m. A (0.2 to 0.28 m) layer of dark grey loam containing limestone inclusions and modern-day debris, tile fragments, sporadic fragments of glazed vessels, and isolated animal bones, was found under the turf (of up 0.12 m). This layer is cut through by a 0.6m wide and 0.4m deep trench going down from the modern-day surface, which is oriented along the NE-SW axis and in which four iron water pipes were laying. Thin (0.02 m) interlayers of limestone grit and light grey loam with large amounts of sand and modern-day debris (0.05 m) were discovered below. This level was overlapping layers of grey (0.42 to 0.6 m) and light brown (0.05 to 0.4 m) loam containing isolated limestones, tile fragments, sporadic fragments of pottery vessels, fragments of clay smoking pipes (2 items) and animal bones. Below, there was a layer of limestone grit with sand clay (0.12 to 0.39 m) and, below that layer, light brown loam (0.38 to 0.59 m) with numerous fragments of roof tiles, fragmented ceramic smoking pipes of the first quarter of the 19th century (3 pcs.), and small fragments of glass bottles. The latter one was underlain by a layer of dark loam (0.12 to 0.44 m). In the stratigraphic succession of N - E and

N - W sides, contours of (0.38 to 0.45 m deep) holes dug from the surface were detected, on which modern-day debris were found.

Pit No. 2. (N44.947258° E34.117715°). Was excavated 1m from the eastern boundary of the site and is orientated along the NE-SW axis. Dimensions: 2x2 m, depth: 2.68 to 2.9 m. The top layer consists of dark soil with large amounts of modern-day construction and household waste (0.12 to 0.20 m thick), which overlapped the buried turf (0.08 m) and a (0.24 to 0.28 m) layer of dark soil with modern-day debris overlying asphalt (0.12 m). Below the asphalt, there were detected layers of light brown (0.12 to 0.14 m) and dark brown (0.16 m) loam. Below them, there were layers of sandy loam with small inclusions of limestone (0.10 to 0.18 m), light yellow (0.7 to 0.12 m) and dark loam with limestone grit (0.12 to 0.22 m), dark loam with small tile fragments (0.6 to 0.78 m), dark soil with limestone grit (0.08 to 0.10 m), grey loam (0.30 to 0.32 m) with limestone grit, fragments of 19th century glass bottles, a fragment of a ceramic smoking pipe, a layer of limestone grit (0.04 to 0.06 m), dark soil (0.20 to 0.36 m). A 0.28 m wide trench was dug in the latter, in which a 0.12 m diameter ceramic water pipe had been laid (which was oriented along the NW-SE axis). The joints of the pipe sections were coated with lime mortar. There were small limestones around the pipe and (0.08 m) fine limestone filler below the pipe in the trench.

Pit No. 3. (N44.947241°, E34.117571°). Was excavated 4.7 m from the eastern boundary of the site and is oriented along the NE-SW axis. Dimensions: 2x2 m, depth: 3.91 m to 4.05 m. Under (0.14 to 0.2 m thick) asphalt, layers of dark grey loam (0.12 to 0.2 m), light sandy clay with crushed stone and limestone grit (0.37 to 0.38 m), and brown loam (0.88 to 0.98 m) were lying sequentially. Those layers contained modern-day rubbish and small fragments of tiles. Below, a (1.18 to 1.42 m) layer of brown clay loam with tile fragments and fragments of pottery vessel walls covered with dark green glaze (2 items) was lying. Under that layer, there was dark brown homogeneous soil (0.88 to 0.91). A fragment of ceramic pipe, 0.12 m in diameter, was recorded in the northern face at a depth of 2.51 m. In the southern side wall, a 0.58 m wide and 1.94 m deep trench oriented along the NW-SE axis was discovered, which had been dug from the surface overlain by asphalt. Isolated large limestones were found in the trench. Modern-day rubbish was found in the trench fill and between masonry stones. A 1.3m deep and 1.2 m wide hole with a massive concrete base of a structure was discovered in the north-eastern side wall.

FINDINGS

Thus, the stratigraphic picture is the same in all of the pits. In addition to a layer of twentieth-century construction debris, an interlayer containing isolated finds from the first half of the 19th century was discovered. Below, there is a thick layer of dark brown homogenous soil to a depth of 4.5 m in pit 3 containing isolated finds from the first half of the XIX century.

Based on the archaeological studies conducted in 2019, it can be argued that no remains of structures dating earlier than the first half of the XX century were found on the land plot located at 21a Vorovskogo Street, Simferopol, cadastral number 90:22:010223:118. The only remains of the cultural layer of the end of the XVIII - first half of the XIX century are some fragments strongly mixed with rubbish of the first half of the XX century. These fragments of the cultural layer in Pit 5 of 2017 and Pits 1 through 3 of 2019 were examined in their entirety. Pit 1 contained fragments of tiles and pottery from the first and second half of the XIX century and three smoking pipes from the first half of the XIX century. Pit 2 contained fragments of pottery, including faience pottery from the first and second half of the XIX century and a fragment of a smoking pipe from the first half of the XIX century. Pit 3 contained fragments of tiles, pottery and glass from the second half of the XIX century – early XX century.

Thus, based on the geological situation in pits 1 through 3 of 2019 and in view of the lack of archaeological remains or cultural layer of the XVII-XVIII centuries, it can be argued that there are no structures or cultural layer associated with the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan)" on the land plot located at 21a Vorovskogo Street, Simferopol, cadastral number 90:22:010223:118. On the basis of the archival data found, in the first instance, the land plot development plan in relation to the land plot allocated to Simferopol Beer and Soft Drinks Plant "Krymbrodrest" in 1952, it was established that brewery tanks were located on the territory of the land plot.

ARCHAEOLOGICAL RECONNAISSANCE ON THE LAND PLOT WITH CADASTRAL NUMBER 90:22:010223:590 AT VOROVSKOGO STREET, NEAR HOUSE 21

In October 2019, four pits were dug on the territory of the land plot with cadastral number 90:22:010223:590 located at Vorovskogo Street, near house number 21. The numbering of the pits continues that of the previous ones.

Pit No. 4. (N44°56.869', E034°07.023') (Figure 32-34). Located 10 m from the northern boundary and 13 m from the western boundary of the site and oriented

along the N-S axis. Dimensions: 2x1m, depth: 2.2 to 2.3m. A (up to 0.3 m) layer of modern-day construction debris lies under the turf (up to 0.12 m deep), and below it there is part of the foundation of a building made of limestone blocks and shell rock, with remnants of concrete and plaster and vertically directed metal utility pipes. The interior space of the building is the brewery's basement filled with a massive pile of construction debris.

Pit No. 5. (N44°56.861', E034°07.0263') (Figure 35-37). Located 0.5 m from the northern boundary and 14 m from the western boundary of the site and oriented along the N-S axis. Dimensions: 2x1m, depth: 1.2 to 1.4m. Under the turf (up to 0.3m deep), a pile of construction debris was found, consisting of blocks of limestone, shell rock, bricks, and concrete, which filled one of the brewery's underground premises.

Pit No. 6. (N44°56.866', E034°07.016') (Figures 38-46). Located 0.5 m from the northern boundary and 1.5 m from the western boundary of the site and oriented along the N-S axis. Dimensions: 2x1m, depth: 1.7 to 1.76m. A layer of modern-day construction debris (0.6 to 0.12 m), consisting mainly of shell fragments, was found under the turf (up to 0.2 m thick) and below it there is grey ash layer (0.56 to 0.8 m) with lenses of burnt debris, limestone inclusions, small fragments of tiles and glass bottle fragments. Water supply and sewerage metal pipes are laid in this layer. Below that layer there are layers of dark brown loam (0.11 to 0.2 m) with coals and tile fragments. Further below, there is a layer of light brown loam (0,36 to 0,7 m), in which fragments of tiles and pottery, a shot glass, a poorly preserved small coin or pendant of white metal (disintegrated during cleaning), and a fragment of a glass bracelet were found. A 0.3 m wide trench was dug in that layer, in which a 0.12 m diameter ceramic water pipe had been laid (which was oriented along the NE-SW axis). The joints of the pipe sections were coated with lime mortar. One of the section of the water supply pipe was discovered nearby.

Pit No. 7. (N44°56.858', E034°07.017') (Figure 47-50). Located 18 m from the northern boundary and 5 m from the western boundary of the site and oriented along the N-S axis. Dimensions: 2x1m, depth: 2 to 2.20m. Interlayers of lime and burnt modern-day debris (0.9 to 0.14 m), pebbles (0.2 to 0.22 m), and burnt clay (0.2 to 0.14 m) were under the turf (up to 0.12 m thick). Below them, there was a grey ash layer (0.6 to 0.68 m) with thin interlayers of brown loam and inclusions of limestone containing small fragments of tiles. Further below, there were layers of light brown loam with ashy lenses (0.6 to 0.75 m) and dark brown loam (0.14 to 0.25 m) containing tile fragments. In the northern and southern parts of the pits, at a depth of 0.5 m, 1.1 m thick masonry from limestone was discovered, probably forming a corner of a building orientated along the NW-SE axis. Fragments of shell rock and

tiles with lime mortar are found among the masonry stones and below. Further below, at a depth of 2.08 m, a 0.28 m wide and 0.12 m high slab (part of the masonry?) oriented along the NE-SW axis was identified. Near the slab, remains of a causeway made of thin tiles, with traces of burning on the surface, were found. A large part of the causeway had been destroyed by a late intrusion into the layer.

FINDINGS

In October 2019, the FSBRI "Crimean Institute of Archaeology of the RAS" conducted field archaeological studies to define more precisely the boundaries of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan) located at 19-23 Vorovskogo Street, Simferopol.

The archaeological studies were carried out pursuant to Archaeological Excavation Permit No. 0600-2019 issued on 31 May 2019 in the name of a junior researcher of the Institute, V. V. Masyakin.

Four pits were dug on the territory of the land plot located at Vorovskogo Street, near house number 21, Simferopol, cadastral number 90:22:010223:590.

The stratigraphic picture is the same in pits 1, 2, and 4. In addition to a layer of XX century construction debris, there is a layer containing fragments of Tartar tiles from the first half of the XX century, isolated fragments of ceramics from the second half of the XIX century and isolated fragments of glass vessels from the second half of the XIX and first half of the XX century. Fragments of building walls made of limestone blocks and shell rock, with remnants of concrete and plaster are located below. Metal utility pipes were found throughout the depth of the pits. The interior space of the buildings is the brewery's underground premises containing massive piles of construction debris.

In Pit 3, below a layer of XX century construction rubble and a layer of dark brown loam with charcoal and tile fragments, there was found a section of a cultural layer heavily damaged by excavations of the second half of the XX century, containing fragments of tiles and pottery, as well as other finds, and a section of a ceramic water pipe, which can be dated to the late XVIII - first half of the XIX century. This part of the cultural layer was studied in its entirety throughout Pit 3.

Based on the pitting conducted in 2019, it can be argued that no remains of structures dating earlier than the first half of the XX century were discovered on the land plot located at Vorovskogo Street, near house number 21, Simferopol, cadastral

number 90:22:010223:590. The only remains of the cultural layer from the end of the XVIII - first half of the XIX century are isolated fragments strongly mixed with rubbish of the second half of the XX century, which were found in pit 3 in the north-west corner of the land plot allotted.

Given that a fragment of damaged cultural layer of the end of XVIII - first half of XIX century was found on the territory of the land plot with cadastral number 90:22:010223:590, archaeological monitoring would be required in case construction work are carried out.

CONCLUSION

In 2019, the FSBRI "Crimean Institute of Archaeology of the RAS" conducted field archaeological studies to define more precisely the boundaries of the newly discovered cultural heritage site "Urban Area of Ak-Mosque, XVII - XVIII centuries (possible site of the Palace of Kalga-Sultan) located at 19-23 Vorovskogo Street, Simferopol. Seven pits with a total area of 20 sq. m were studied on two land plots with the cadastral numbers 90:22:010223:118 and 90:22:010223:590. A large part of the territory is occupied by a layer of ruined structures of the brewery from the XX century. A fragment of a damaged cultural layer of the end of the XVIII - first half of the XIX century was discovered on the territory of the land plot with the cadastral number 90:22:010223:590. No remains of structures dating earlier than the first half of the XIX century were identified.

LIST OF REFERENCES

Abdulvapov N. The Territory of the Palace of the Crimean Kalga-Sultan and the Mosque of Mengli Giray // Collection of Historical, Architectural and Cultural Monuments of the Crimean Tatars. Vol. 3. Simferopol, 2018.

Seydaliev E. I. Reconnaissance on the supposed site of the Palace of Kalga-Sultan in Simferopol // IAK. Vol. VIII, 2018.

Annex 31

Witness Statement of [REDACTED], 3 March 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

WITNESS STATEMENT OF

[REDACTED]

3 MARCH 2023

1. My name is [REDACTED]
[REDACTED]
[REDACTED] (hereinafter, “KFU”).
2. [REDACTED]
[REDACTED]
3. I have taught the Ukrainian language at different levels of education: school, teacher training college and university. In 2007, I completed m [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
4. I was asked to talk about the teaching process at the Department of Ukrainian Philology at KFU and extracurricular activities related to the Ukrainian language.
5. The Department of Ukrainian Philology is part of the Institute of Philology. The Department provides Education for Bachelors by programme 45.03.01 Philology (the Ukrainian Language and Literature) and for Masters by programme 45.04.01 Philology (the Ukrainian philology in cross-cultural interaction). The curricula include such disciplines as Modern Ukrainian Language, History of Ukrainian Literature, History of Ukrainian Language, Methods of Teaching Ukrainian Language, Oral Folk Art, Crimean Motifs in Ukrainian Literature, etc.
6. Our institute is provided with everything necessary for teaching students the Ukrainian language, including classrooms and textbooks.
7. About 15 students annually enroll in Ukrainian Philology programmes for Bachelor’s programmes (according to the State order) and 5-10 students for Master’s programmes. The competition for admission is 1.1-1.2 students per place. At the same time, if the university management sees an increased demand for our Department programmes, it tries not to refuse to enroll more students for studies on a budgetary basis¹ and often finds a way to accommodate applicants, especially those with good grades and personal achievements.

¹ Studying on a budgetary basis means that the student does not have to pay tuition fees, as they are paid from the state budget.

8. After graduation, most of our students stay to work in Crimea, some become teachers of native language and Russian language and literature in schools.
9. As for research activities, the Department is alternately recruiting postgraduate students in the fields of Slavic Language and Literature of Foreign Countries (Ukrainian Literature). Scientific personnel at the Department are engaged in a variety of problems related to the Ukrainian language and literature: problems of phraseology, literary comparativism (the study of Ukrainian-Russian literary relations), the study of the pages of life and works of Ukrainian writers, the coverage of the Crimean motifs in Ukrainian literature. The Department is currently developing a research theme “Ukrainian Philology in a Multicultural Communicative Space”.
10. I would like to emphasise that most of [REDACTED] teachers have degrees.
11. The Department is an active organiser of various scientific events. In particular, together with the Department of Ukrainian Philology at the Faculty of Philology of KIPU named after Fevzi Yakubov and the Shevchenko Library, we organise a scientific and practical conference “Taras Shevchenko i Syogodennya” (Taras Shevchenko and the Present). On 10 March 2022, it was held for the twelfth time.² I am posting photos from the event below.

² Library – branch No. 7 n.a. T. Shevchenko, *Events dedicated to T. Shevchenko* (2022), available at: <https://libsevchenko.nethouse.ru/page/1081880> (Exhibit A).



12. I want to mention also literary readings “Aleksandr Gubar and Petr Kyrychek - Chroniclers of Crimean Ukrainian Literature”,³ scientific and practical conference “Genre and Style Specificity of Ukrainian Poetry of the XXth - Early XXIst Century”,⁴ other conferences dedicated to the Ukrainian writers (Lesya Ukrainka, for instance).⁵ I am also posting photos from these events below.



Conference “Aleksandr Gubar and Petr Kyrychek - Chroniclers of Crimean Ukrainian Literature”

³ Tavrda Academy, *In memory of the chroniclers of Ukrainian literature in Crimea* (31 October 2019), available at: <https://ta.cfuv.ru/ru/news/6170> (Exhibit B).

⁴ Tavrda Academy, *Conference “Genre and Stylistic Specificity of Ukrainian Poetry of the XXth - Early XXIst Centuries”* (6 April 2018), available at: <https://ta.cfuv.ru/ru/news/4727> (Exhibit C).

⁵ Tavrda Academy, *Scholars discuss the work of Lesya Ukrainka and other modern writers and artists* (8 October 2019), available at: <https://ta.cfuv.ru/ru/news/6065> (Exhibit D).; Tavrda Academy, *XVII Scientific and Practical Conference Dedicated to the Works of Lesya Ukrainka* (1 November 2018), available at: <https://ta.cfuv.ru/ru/news/5344> (Exhibit E).



Conference “Genre and Stylistic Specificity of Ukrainian Poetry of the XX - Beginning of the XXI Century”





Conferences on the work of Lesya Ukrainka

13. Having become a structural part of the Institute of Philology, the Department of Ukrainian Philology is a permanent and active participant in international events organised by the Institute, such as the VII International Interdisciplinary Scientific Conference “Convergent Technologies XXI: Variability, Combinatorics, Communication” (25-26 November 2022).
14. Within the Days of Academic and Scientific Mobility of Students, held in 2020, the staff of our Department, including myself, held a student forum “Literary Criticism and Linguacultural Aspects of Work on the Text (on the Example of Ukrainian Literature and Language). Literary and Cultural Aspects”.
15. Students with an active interest in the Ukrainian language can express themselves in various extra-curricular activities where they can demonstrate their language skills.
16. For example, I would like to mention the translation competition “Varietasdelectat”, in which students competed in the quality of translation of poetry in Russian, Ukrainian, Belarusian, Bulgarian, Crimean Tatar, Polish and Czech. and were awarded prizes.

17. ■ students are regular participants and winners of the Crimean recitation competition “On the Main Thing in your Native Language” (held in the village of Simeiz).
18. The high quality of teaching Ukrainian at our Department is confirmed by the success of our students at major student events. At the III All-Russian Student Forum of the state languages of the Republic of Crimea with international participation, students of our Department won eight prizes. They also performed excellently at the Republican Scientific-Practical Conference “Scientific Research in the Modern Realities of Crimea”.
19. ■ students do not limit themselves to philology, but also attend cultural events, such as an annual workshop on traditional Ukrainian Easter egg painting (pysanka) and a workshop on making Slavic motanka dolls, which are organized by our Department.
20. I am not aware of any attempts on the part of the State to limit or prohibit the education and study of the Ukrainian language or its use in the educational process in higher education.

Witness

[Signature]

■

Simferopol, 3 March 2023

LIST OF EXHIBITS

Number:	Name of exhibit:
Exhibit A	Library – branch No. 7 n.a. T. Shevchenko, <i>Events dedicated to T. Shevchenko</i> (2022).
Exhibit B	Tavrida Academy, <i>In memory of the chroniclers of Ukrainian literature in Crimea</i> (31 October 2019).
Exhibit C	Tavrida Academy, <i>Conference “Genre and Stylistic Specificity of Ukrainian Poetry of the XXth - Early XXIst Centuries”</i> (6 April 2018).
Exhibit D	Tavrida Academy, <i>Scholars discuss the work of Lesya Ukrainka and other modern writers and artists</i> (8 October 2019).
Exhibit E	Tavrida Academy, <i>XVII Scientific and Practical Conference Dedicated to the Works of Lesya Ukrainka</i> (1 November 2018).

Exhibit A

Library – branch No. 7 n.a. T. Shevchenko, *Events dedicated to T. Shevchenko* (2022)

(excerpt, translation)

**Excerpt
Translation**

Library – branch No. 7 n.a. T. Shevchenko, *Events dedicated to T. Shevchenko (2022)*, available at: <https://libsevchenko.nethouse.ru/page/1081880>.

Events dedicated to T. Shevchenko

2022

The XII scientific and practical conference “Taras Shevchenko and Today” was opened at the Fevzi Yakubov Crimean Engineering and Pedagogical University (KIPU) on 10 March 2022 in the framework of the Forum of Native Languages. The organizers of the conference were the Department of Ukrainian Philology of the Faculty of Philology of the KIPU, the Department of Ukrainian Philology of the Institute of Philology of the Vernadsky Crimean Federal University (KFU) and Branch No. 7 named after Shevchenko of the Centralised Library System of the City of Simferopol.

The plenary session of the conference was opened by Doctor of Sciences (Philology), assistant professor, head of the Department of Ukrainian Philology of the Fevzi Yakubov KIPU Nina Fedorovna Grozyan. Welcoming remarks were made by: Alime Ismailovna Apselyamova, Candidate of Sciences (Politics), associate professor, dean of the Faculty of Philology of the Fevzi Yakubov KIPU, and Nikolai Ivanovich Pelipas, Candidate of Sciences (Philology), associate professor, head of the Department of Ukrainian Philology, Institute of Philology, Vernadsky KFU (online).

Presentations were made by scholars of the KIPU and KFU.

The head of Library Branch No. 7 named after T. Shevchenko Natalia Vasilyevna Karzhavina gave a presentation and the report “To Live is to Serve the People” (online).







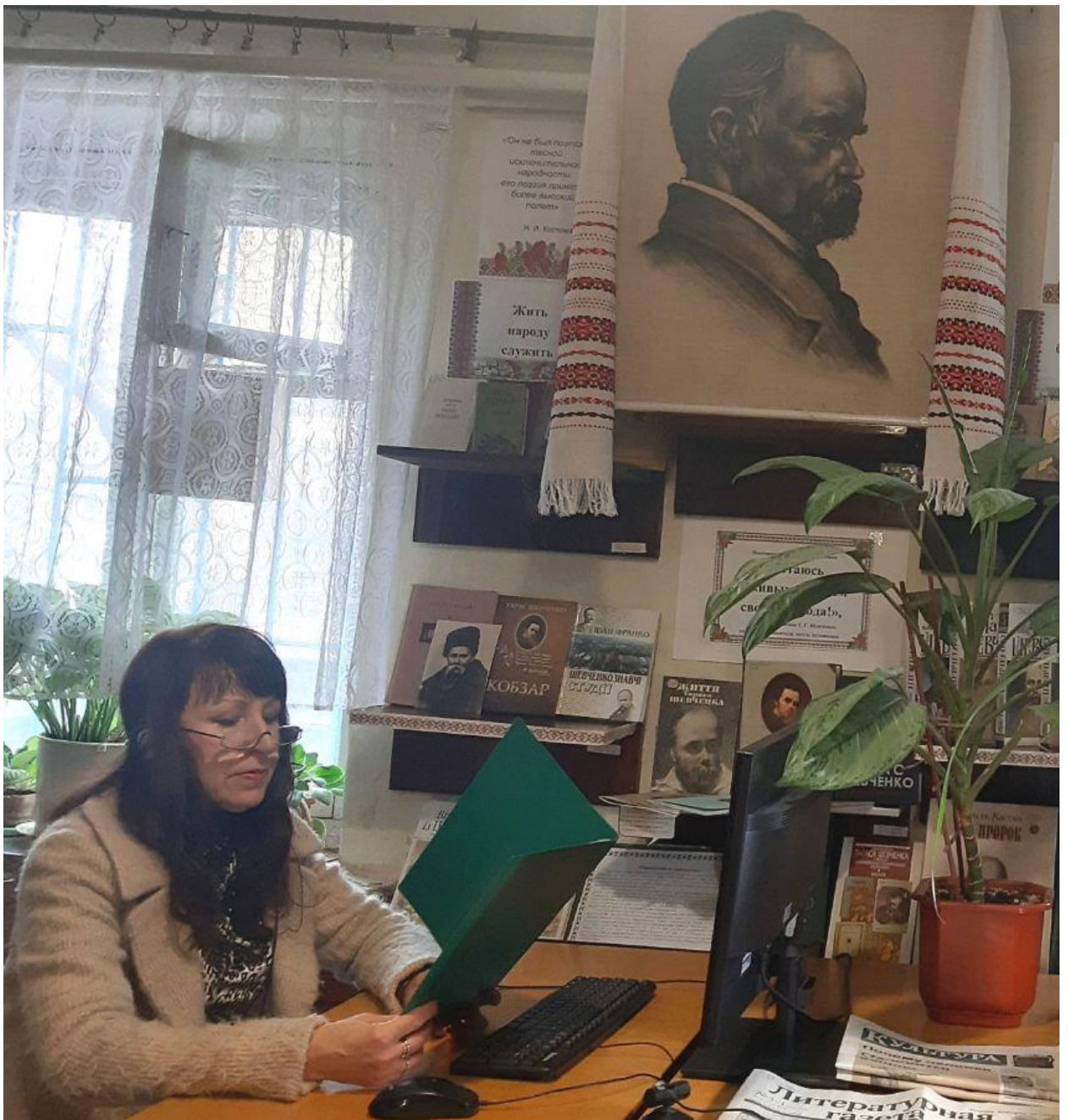


Exhibit B

Tavrida Academy, *In memory of the chroniclers of Ukrainian literature in Crimea*
(31 October 2019)

(translation)

Translation

Tavrida Academy, *In memory of the chroniclers of Ukrainian literature in Crimea* (31 October 2019), available at: <https://ta.cfuv.ru/ru/news/6170>.

In memory of the chroniclers of Ukrainian literature in Crimea



In October of this year, students and teachers from the Department of Ukrainian Philology at Crimean Federal University held annual literary readings “Aleksandr Gubar and Petr Kyrychek - Chroniclers of Ukrainian Literature in Crimea”.

Opening the readings, Head of the Chair of Ukrainian Philology Professor Viktor Gumenyuk noted that it was Aleksandr Gubar and Petr Kyrychek, who for many years worked in the leading university of Crimea, were those who skillfully combined the work of a scholar and a teacher and raised several generations of Ukrainian philologists. The participants of the readings emphasised the significant contribution of scholars to the study of Ukrainian literature and interethnic cultural relations.

Students prepared reports based on Aleksandr Gubar and Petr Kyrychok’s research materials. Ksenia Kuryata, Andrey Georgiev, and Anton Krutikov were recognised as the best speakers.

The organisers of the readings are sure that such events will familiarise students with the pages of the university's history and expand the scope of their scientific research.

Exhibit C

Tavrda Academy, *Conference “Genre and Stylistic Specificity of Ukrainian Poetry of the XXth - Early XXIst Centuries”* (6 April 2018)

(translation)

Translation

Tavrida Academy, *Conference “Genre and Stylistic Specificity of Ukrainian Poetry of the XXth - Early XXIst Centuries”* (6 April 2018), available at: <https://ta.cfuv.ru/ru/news/4727>.

Conference “Genre and Stylistic Specificity of Ukrainian Poetry of the XXth - Early XXIst Centuries”



On April 4, Department of Ukrainian Philology of the Faculty of Slavic Philology and Journalism held a scientific and practical conference "Genre and Stylistic Specificity of Ukrainian Poetry of the XXth - Early XXI Centuries".

The conference discussed trends, currents and styles in Ukrainian poetry of XX - early XXI centuries, thematic and genre-stylistic horizons of poetic discourse of the given period, stylistic and linguistic and cultural aspects of the study of new poetic texts. A number of papers included comparative analysis of Ukrainian and Russian poetry.

A separate area of the conference was research into the methodological and theoretical aspects of studying poetic creativity. In addition to professors and students, teachers from Crimean schools, including former graduates of the Ukrainian Philology Department, were active in this area.

The conference included a round table entitled "The Poetic World of Mikhail Ternavsky: Text and Contexts" dedicated to the Crimean poet and translator, author of original vers libre and Esperanto poetry. The first-year students, who have recently begun their philological studies but are already making bold steps in philological science, were especially active in the round table.

Exhibit D

Tavrida Academy, *Scholars discuss the work of Lesya Ukrainka and other modern writers and artists* (8 October 2019)

(translation)

Translation

Tavrida Academy, *Scholars discuss the work of Lesya Ukrainka and other modern writers and artists* (8 October 2019), available at: <https://ta.cfuv.ru/ru/news/6065>.

Scholars discuss the work of Lesya Ukrainka and other modern writers and artists

Crimea hosted the XVIII scientific-practical conference "The works of Lesya Ukrainka and other modern writers and artists in the context of tendencies of dramatisation and theatricalisation of the artistic process". It brought together prominent scientists, pedagogues, and teachers from Crimean schools, as well as students.

The conference included sections dedicated to the writer's work, aspects of literature studies, linguistic and cultural aspects of the dramatisation and theatricalisation of the art process, and methodological aspects of studying and teaching literature, including questions of interaction between narrative and theatrical works. The conference also included a creative meeting with teachers of the Academy of Humanities and Education of the CFU n.a. Vernadsky and Ukrainian poets Viktor Vinogradov and Denys Mokrentsov. At the Crimean Engineering and Pedagogical University, a round table discussion entitled "The Anthropological Paradigm of Literary and Language Space and Its Role in Teaching Methodology of Philological Disciplines" was held.

The conference was organised by the Department of Ukrainian Philology at the Tavrida Academy of CFU together with the Department of Russian and Ukrainian Philology and Teaching

Annex 31 Exhibit D

Methodology at the CFU Academy of Humanities and Education and the Department of Ukrainian Philology at the Crimean Engineering and Pedagogical University.

Exhibit E

Tavrida Academy, *XVII Scientific and Practical Conference Dedicated to the Works of Lesya
Ukrainka* (1 November 2018)

(translation)

Translation

Tavrida Academy, XVII Scientific and Practical Conference Dedicated to the Works of Lesya Ukrainka (1 November 2018), available at: <https://ta.cfuv.ru/ru/news/5344>.

Scientific and Practical Conference Dedicated to the Works of Lesya Ukrainka



The Department of Ukrainian Philology of the Faculty of Slavic Philology and Journalism hosted the XVII Academic and Practical Conference "The Work of Lesya Ukrainka and Other Writers and Artists of the Modern Era in the Context of Dramatisation and Theatricalisation of the Art Process".

The conference was held during three days (October 24-26) at three traditional venues. In addition to the Department of Ukrainian Philology at the Taurida Academy, the conference participants were hosted by the Crimean Engineering and Pedagogical University and the Academy of Humanities and Education in Yalta.

The event was attended by teachers and students from various departments of Vernadsky Crimean Federal University and other Crimean universities, and teachers from Crimean schools.

The conference dedicated to Lesya Ukrainka has been organised by the department of Ukrainian philology since 2002. Today the event broadened the scope of the research, so in addition to literary, linguistic and cultural studies devoted to Lesya Ukrainka, the reports were presented on various topics. For example, the section meetings were focused on the literature of the native land, Crimean

motifs in works of fiction, the Slavic pantheon, modern issues of literary genology (the Christmas story, fanfiction, fantasy), the works of contemporary authors (Luko Dashvar, Maria Matios, Sviatoslav Vakarchuk), etc.

As part of the event, teachers and students of Ukrainian Philology department visited Yalta to visit the monument and museum of Lesya Ukrainka and to continue the conference. The creative meeting with the Yalta poets Viktor Vinogradov and Denis Mokrentsov was memorable. They recited poems, told about the beginning of their creative way and revealed some secrets of their work. After the performance the listeners, especially those interested in poetry, had an opportunity to talk to the authors additionally.

The conference was productive and will be continued next year.

Violetta Kalina

Annex 32

Witness Statement of [REDACTED], 2 March 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
THE INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

WITNESS STATEMENT
OF 

2 MARCH 2023

1. I, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
2. I am giving this witness statement in response to accusations by Ukraine in the dispute before the International Court of Justice that the Russian Federation is allegedly preventing the promotion of Ukrainian culture and harassing ensembles performing Ukrainian pieces of art. Being [REDACTED] of just such an ensemble, I want to state with absolute certainty that such accusations have nothing to do with reality.
3. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
4. [REDACTED]
[REDACTED]
[REDACTED]
5. At the moment our ensemble consists of 6 members, who have been participating practically since its foundation. Unfortunately, some of the members passed away, but new young soloists join us all the time.
6. The activities of our ensemble are filled with a reverent attitude towards Ukrainian culture in general and Ukrainian songs in particular. In my opinion, the ethnic makeup of our ensemble played an important role in this, the majority of the ensemble being ethnic Ukrainians. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

¹ Centre for Folk Art of the Republic of Crimea, *Folk Vocal Ensemble "Raduga" of the Lekarstvensky Village Club of the Second Municipal Budgetary Institution of Culture "Centralised Club System of Simferopol District" (Head - Rudakova Tatyana Ivanovna)*, available at: <https://cnt-rk.ru/narodnuy-vocalnyi-ansambl-raduga/> (Exhibit A).

7. In addition to our ensemble, the village club has a number of multinational creative groups. The Fenix choreographic group includes Russians, Crimean Tatars and Ukrainians. The children's choreographic group "Kinderdance" even includes Bulgarians. There are Russians, Crimean Tatars, Ukrainians and Greeks in the Vdokhnovenye folk theatre. All groups friendly cooperate with each other regardless of the nationality of members.
8. For our cultural activities many members of the ensemble are awarded and given honorary titles. In addition to me, the title of Honored Cultural Worker of Crimea was awarded to the accompanist of the Raduga folk ensemble [REDACTED]. Head of the Vdokhnovenye folk theatre [REDACTED] is also Honored Cultural Worker of Crimea. And, for example, one of the members of our collective, [REDACTED], at the moment will be included in the booklet of honorary participants of amateur art with a length of service of more than 20 years, because she has been engaged in folk art and promoted the Ukrainian culture for 40 years.
9. Our team performs traditional folk songs, many of them are Ukrainian. Moreover, we perform them in traditional Ukrainian costumes: folk costumes of Kharkov region and stylized modern Ukrainian costumes.
10. We choose our own repertoire and include Ukrainian folk songs, as most of our members are ethnic Ukrainians, who have been taught to love very melodious and euphonious Ukrainian songs since their childhood. At the same time, we have never felt harassed or censored in relation to performing songs in Ukrainian. Our audiences are happy to hear Ukrainian folk songs and always expect them with enthusiasm.
11. We take part in concerts and competitions of different levels: rural, district, regional and all-Russian. At the same time, we also tour throughout Russia and perform songs in Ukrainian. For example, we have recently performed a medley of Ukrainian songs to confirm our title of a folk group. This year we also took part in the All-Russian Festival-Marathon "Songs of Russia" in Simferopol, where we performed songs in Ukrainian.² In 2015, we took part in a folk-art festival at the Lesya Ukrainka Palace of Culture in

² Crimean Newswire, "Songs of Russia" festival-marathon starts in Crimean capital (25 June 2022), available at: <https://crimea-news.com/culture/2022/06/25/937897.html> (Exhibit B).

Novograd-Volynsky.³

12. We have won many vocal competitions. For example, in 2019 we won the Republican Festival-Contest "From Heart to Heart" dedicated to Elderly People's Day.⁴ This year we won first places at the "Altyn Maidan" festival in the Chernomorsky District and at the festival dedicated to Elderly People's Day in Schebetovka.
13. The group rehearses in a building dating back to 1975, which was first used as a kindergarten, later constantly converted into a café and sports facilities.
14. Unfortunately, soon after the creative team started working in the building, it became clear that it was in need of repair, which had not been done for decades. It was not very comfortable to work in the club because of the quality of windows. Nevertheless, our love of Ukrainian folk art and culture allowed us to overcome all hardships.
15. After Crimea's reunification with the Russian Federation in 2014, the situation changed. Money was allocated from the state budget through the Simferopol district Administration to repair the building. As a result, we had windows replaced, new doors installed, new wiring, heaters and air conditioning and lighting installed. All this allowed the staff of the village club to work in comfortable conditions.
16. In addition, I also observe how funds are allocated in the Simferopol district for the renovation of clubs and Houses of culture.
17. I regularly receive my salary without any delays, as well as the benefits for honorary titles and excellence.

Witness

³ City of Zvyagel, *Creativity Festival in Novograd-Volynsky* (18 November 2015), available at: <https://www.04141.com.ua/news/1033378/prazdnik-tvorcestva-v-novograd-volynskom> (Exhibit C).

⁴ Feodosiya Guide, *"From Heart to Heart" Republican Festival-Contest held on Day of the Older Persons - Feodosiya news* (8 October 2019), available at: <https://feodosiya-gid.ru/news/kultura/sostoyalsya-respublikanskiy-festival-konkurs-ot-serdca-k-serdcu-posvyaschenny-dnyu-pozhilogo-cheloveka.htm> (Exhibit D).

[Signature] _____



Lekarstvennoye Village, Simferopol District, 2 March 2023

LIST OF EXHIBITS

Number:	Name of exhibit:
Exhibit A	Centre for Folk Art of the Republic of Crimea, <i>Folk Vocal Ensemble “Raduga” of the Lekarstvensky Village Club of the Second Municipal Budgetary Institution of Culture “Centralised Club System of Simferopol District”</i> .
Exhibit B	Crimean Newswire, <i>“Songs of Russia” festival-marathon starts in Crimean capital (25 June 2022)</i> .
Exhibit C	City of Zvyagel, <i>Creativity Festival in Novograd-Volynsky (18 November 2015)</i> .
Exhibit D	Feodosiya Guide, <i>“From Heart to Heart” Republican Festival-Contest held on Day of the Older Persons - Feodosiya news (8 October 2019)</i> .

Exhibit A

Centre for Folk Art of the Republic of Crimea, *Folk Vocal Ensemble “Raduga” of the Lekarstvensky Village Club of the Second Municipal Budgetary Institution of Culture*
“Centralised Club System of Simferopol District”

(translation)

Translation

Centre for Folk Art of the Republic of Crimea, *Folk Vocal Ensemble “Raduga” of the Lekarstvensky Village Club of the Second Municipal Budgetary Institution of Culture “Centralised Club System of Simferopol District”* (Head - Rudakova Tatyana Ivanovna), available at: <https://cnt-rk.ru/narodnuy-vocalnyi-ansambl-raduga/>.

Folk Vocal Ensemble “Raduga” of the Lekarstvensky Village Club of the Second Municipal Budgetary Institution of Culture “Centralised Club System of Simferopol District” (Head - Rudakova Tatyana Ivanovna)

In 1983 the vocal ensemble "Raduga" was created by an accordionist Rudakov Yuri Mikhailovich in the club of the phytosovkhoz "Raduga" LLC of Lekarstvennoe village. Since 1985 the ensemble has been headed by choirmaster Rudakova Tatiana Ivanovna.

The main purpose of the group is to protect and promote Russian and Ukrainian folk art and formation of aesthetic taste both among the participants and the audience.

Rehearsal process in the group is organised according to the traditional system of work in vocal-choral genre and includes different forms: work on breathing, articulation exercises, singing, work on the piece (familiarisation, technical, artistic mastering of the piece), technical, dress rehearsals - all this is geared to the final result - concert performances, the most important element in the activity of the ensemble and, last but not least, the final stage - analysis of the performance, review of video material, and discussion of the negative and positive aspects. Studying and performing the songs solves many of the following tasks: expanding the voice range, developing vocal and choral skills, developing harmonic hearing, fostering a good musical taste, etc.

The repertoire of the group is diverse, includes both traditional and modern styles and directions of vocal arts. Every year a lot of new and interesting songs appear in the repertoire from various regions of Russia. Their genre includes flowing and lyrical, fun and playful songs. The repertoire also includes wedding ceremonies, Christmas carols and other folk performances.

In 1995 the ensemble "Raduga" was awarded the title "Folk amateur ensemble", which has been renewed for many times. **In 2016**, the ensemble was awarded the title "People's" in accordance with the Regulation of Ministry of Culture of the Russian Federation. In 2019, the ensemble has deservedly reclaimed this title.

The ensemble Raduga leads an active concert life, performing at the district festivals: Maslenitsa, Ivan Kupala, Autumn fairs, Days of Simferopol district, Days of village workers, at the Plenums of the employees of the Simferopol district organisation of trade unions of education and science, in the military unit in charge, in the Republican Hospital of War Veterans, the Line Department of Railway Police.

The companion ensemble "Raduzhanochka" performs annually in the children's boarding school in the village of Gvardeyskoe on Day of the Disabled. The children's group is a permanent participant in all events held in Lekarstvenniy village club - 2, gaining skills in vocal and choral singing, improving their general musical culture, developing creativity, giving birth to a child's vivid imagination and creativity.

In 2009 Crimean television presented a film about the work of the ensemble "Raduga", in 2010 the ensemble took part in the TV show "Good Morning", in 2019 - in the programme "Crimean Stories". Ensemble took part in International and Republican festivals - Festival of Cossack culture "Krymskiye Tulumbasy", "Sodruzhestvo" in Taganrog, Rostovskiy region, "Venok druzhby" in Bobruisk, Republic of Belarus, festival of Ukrainian folklore in Lutsk, Ukraine, festival of artistic creativity «With Russia in the Heart" in Moscow and Smolensk.

Since 2000 the leaders of the ensemble "Raduga" Rudakova Tatyana Ivanovna and Rudakov Yuriy Mikhailovich have been awarded the title "Honoured Worker of Culture of the Republic of Crimea".



Exhibit B

Crimean Newswire, *“Songs of Russia” festival-marathon starts in Crimean capital*
(25 June 2022)

(translation)

Translation

Crimean Newswire, *“Songs of Russia” festival-marathon starts in Crimean capital* (25 June 2022), available at: <https://crimea-news.com/culture/2022/06/25/937897.html>.

“Songs of Russia” festival-marathon starts in Crimean capital

25 June 2022, 21:27 | Culture



The **“Songs of Russia” All-Russian Festival-Marathon** was launched in Simferopol under the art direction of its author, People's Artist of the Russian Federation Nadezhda Babkina. The project aims to promote, develop and support the traditions of Russian culture, the rich intangible heritage of the peoples of Russia.

For Crimeans and guests of the peninsula a concert was held. The concert included folk art of People's

Artist of Russia Nadezhda Babkina and the Moscow State Ensemble "The Russian Song", the Governor's Dance Theatre "Siberian Kaleidoscope", singer Evgeny Gora, the ensemble "Slavyane", the ballet "Live Planet", folk-rock band "After 11", the accordionist duo "The Bondarenko Brothers", singer Ivan Zamotayev.

In the framework of the festival creative meetings and master classes will be held. The concerts of the festival will be held in Feodosia (June 26), the townlet of Krasnogvardeisky (June 27), Evpatoria (June 28), Kerch (June 29), Yalta (June 30), the townlet of Razdolnoe (July 1), Pervomaysky District (July 2), Belogorsk (July 3) and Bakhchisaray (July 4). Start of the concert at 19:00. Entrance is free to all the events.

Press service of the Ministry of Culture of the Republic of Crimea

Exhibit C

City of Zvyagel, *Creativity Festival in Novograd-Volynsky* (18 November 2015))

(translation)

Translation

City of Zvyagel, *Creativity Festival in Novograd-Volynsky (18 November 2015)*, available at: <https://www.04141.com.ua/news/1033378/prazdnik-tvorcestva-v-novograd-volynskom>.

Creativity Festival in Novograd-Volynsky

10:39, 18 November 2015

Once again, the Lesya Ukrainka Town Palace of Culture is welcoming lovers of Ukrainian folk songs.

On November 15, the great hall gathered admirers of the folk men's ensemble "Khmel", which celebrated its 15th anniversary since its establishment, the head of which is the Honoured Worker of Culture of Ukraine Nikolay Kurkach.

More than 600 spectators had the opportunity to enjoy the performance of rousing songs of the ensemble and the creativity of People's Artist of Ukraine Yuri Gradovsky and amateur teams of the Palace of Culture. In the warm and friendly atmosphere, in which the whole event took place on the stage, the team received congratulations from the Directorate of Culture of the Regional State Administration, represented by the Head of Yu. G. Gradovsky, the Head of the Department of Culture of the City Council L.V. Zayats and the director of the City Palace of Culture I. D. Antipchuk.

On such an important day for "Khmel", they were congratulated by colleagues with whom the ensemble has been working for many years. Leaders of creative collectives not only welcomed jubilees with beautiful and warm words but also presented their creative performance. Folk trio "Vera" (Head - honoured worker of culture of Ukraine Matviychuk), representatives of folk theatre (Head - V. Olshevskiy), folk song and dance ensemble "Polesye" (the head of the choir group - Honored Worker of Culture of Ukraine M. Artemiuk and the head of the dance group (A. Dirko), participants of folk choir of veterans of labor, represented by the head of the group L. Steblina and leading singer L. Ozyuk, children's choreographic ensemble "Raduga" (director K. Rudakova) and a municipal dixieland band (director O. Gurban) were able to touch the soul of every viewer by their creativity.

Each appearance of the ensemble "Khmel", that was announced by the director and host of the event Irina Panasjuk, was accompanied by loud applause of the audience and the ensemble did not leave the stage for two hours. The concert was also visited by the conscripts of 30th separate mechanized brigade, who were not indifferent to the creativity of the ensemble. It is pleasant that the folk men's ensemble "Khmel" also has its patrons, namely, private entrepreneurs V. F. Androshchuk, M. M. Martinyuk and A. A. Lavrenyuk, to whom the team is sincerely grateful.

"The highest award for the artist is the presence and applause of the audience". We wish the ensemble to gather their fans in future, giving them their unique art.

Exhibit D

Feodosiya Guide, *“From Heart to Heart” Republican Festival-Contest held on Day of the Older Persons - Feodosiya news* (8 October 2019)

(translation)

Translation

Feodosiya Guide, *“From Heart to Heart” Republican Festival-Contest held on Day of the Older Persons - Feodosiya news* (8 October 2019), available at: <https://feodosiya-gid.ru/news/kultura/sostoyalsya-respublikanskiy-festival-konkurs-ot-serdca-k-serdcu-posvyaschennyy-dnyu-pozhilogo-cheloveka.htm>.

“From Heart to Heart” Republican Festival-Contest held on Day of the Older Persons - Feodosiya news

More than 400 people took part in the event: solo performers, duets, trios, ensembles, choirs, and amateur folk groups.

The Shchebetovka House of Culture (HC), Feodosia Urban District, hosted the Republican festival-contest "From Heart to Heart" dedicated to the Day of the Older Persons. The founders and organisers of the contest were the Ministry of Culture of the Republic of Crimea and the Folk Art Centre of the Republic of Crimea.

More than 400 people took part in the event: solo performers, duets, trios, ensembles, choirs, and amateur folk groups from all regions of the peninsula aged 55 and older.

The head of the Shchebetovka village administration Igor Ivanov and the chairperson of the jury, professor of the musical art department of the Crimean University of Culture, Arts and Tourism, People's Artist of Ukraine Elena Basargina delivered welcome speeches. The military orchestra of the Russian National Guard conducted by Daniil Rafailov presented musical compositions.

A jury consisting of leading specialists in the sphere of culture of the peninsula was formed for the contest programme: chair Elena Basargina; head of the department of recreational activities of the Folk Art Center of the Republic of Crimea Evgeniy Litvinenko; specialist in concert and tour activities of the Crimean State Philharmonic Society Natalia Prokopenko; methodology expert of the Simferopol district Centralised Club System Larissa Sapozhnikova; and director of the Shchebetovka HC Yuriy Zheleko.

Performances of the groups and solo performers resulted in the following winners:

First prize winners:

Enver Barakaev (Slavyanskoye Rural HC, head Ilimdar Petislyamov); Rainbow Folk Vocal Ensemble (Lekarstvennoye Rural HC, head Tatyana Rudakova); Native Tunes Folk Choir (Kolchugino Rural HC, Simferopol district, head Natalia Panchenko).

Second prize winners:

Nina Suvorova (soloist of Feodosia Urban HC headed by Margarita Zorina and Alexander Berzhakov); Smerichka Ukrainian Folk Song Ensemble (Sudak Urban HC, head Sofia Mysiv); Zori Folk Choir (Chernomorsky District HC, head Elvis Abibullayev).

Third prize winners:

Maria Tsurkan (soloist, Native Tunes Ensemble, Zavetnoye Village), Singing Hearts Ensemble (Nasypnoye Centre of Culture and Recreation, head Valery Dolgikh); Choir of the amateur association "Veteran" (Bakhchisarai District HC, soloist Galina Krasova, head Lyudmila Sarycheva, accompanist Nikolay Ryabov).

The Grand Prix was awarded to the Red Carnation Folk Choir of war and labour veterans (Feodosia Urban HC headed by Margarita Zorina and Aleksandr Berzhakov).

The Audience Award went to the Singing Hearts Ensemble of the Simferopol Variety Arts Centre (led by Alexander Dudorov).

Press Service of the Ministry of Culture of the Republic of Crimea

Annex 33

Witness Statement of [REDACTED], 7 March 2023

(translation)

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION
FOR THE SUPPRESSION OF THE FINANCING OF TERRORISM AND
INTERNATIONAL CONVENTION ON THE ELIMINATION OF
ALL FORMS OF RACIAL DISCRIMINATION**

(UKRAINE V. RUSSIAN FEDERATION)

WITNESS STATEMENT
OF 

7 MARCH 2023

1. I, [REDACTED], a Crimean Tatar, declare the following.
 2. I am an [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].
 3. Between 2017 and 2020, I was [REDACTED]
[REDACTED] which includes the Millet TV channel and the Vatan Sedasy radio station.
 4. I present this witness statement on issues related to the dispute initiated by Ukraine before the International Court of Justice. The statement raises a number of issues related to the activities of the Crimean Tatar media in Crimea, the functioning of Crimean Tatar representative institutions, the perception by Crimean Tatars of the Mejlis of the Crimean Tatar People, and the quality of higher education in Crimea.
 5. Due to my active participation in public, academic and political life on the peninsula, as well as the fact that I have lived in Crimea all my conscious life, I am fully aware of the condition of Crimean Tatars before and after the reunification of Crimea with Russia in 2014. This witness statement is based on my personal knowledge of the circumstances surrounding these issues, as well as on the documents referenced below.
- A. MEJLIS**
6. I strongly disagree with the assertion that the Mejlis of the Crimean Tatar People can be considered the mouthpiece of all Crimean Tatars.
 7. First, the Mejlis has never represented *all* Crimean Tatars. According to some estimates, in 2014 support for the Mejlis among Crimean Tatars was round 18%.¹ Despite this, the Mejlis has always sought the role of the sole representative of our people. The Mejlis always got in confrontation with other public associations that also supported the Crimean Tatars if it saw they were getting attention.

¹ Ukraine ru, *Dzhemilev and the West Try to Prevent Crimea from Joining Russia* (28 November 2014), available at: <https://ukraina.ru/20141128/1011319376.html> (Exhibit A).

8. Specifically, when Ukrainian President Viktor Yanukovich appointed representatives of Crimean Tatar organizations opposed to the Mejlis to the Council of Representatives of the Crimean Tatar People Under the President of Ukraine in 2010, the Mejlis boycotted the Council's work.²
9. Second, support from Crimean Tatars to Mejlis vanished after the inhumane blockade of Crimea by the Mejlis activists. The blockade included:
 - (a) The closure of the North Crimean Canal which accounted for more than 85% of fresh water supply to the peninsula (water blockade);
 - (b) Blowing up of the electricity transmission towers that provided Crimea with electricity (energy blockade);
 - (c) Blocking transport communication between Ukraine and Crimea (transport blockade); and
 - (d) A ban on the supply of goods to Crimea (trade blockade).
10. Fortunately, Crimea, with Russia's support, was able to successfully withstand the actions that Ukraine and the Mejlis carried out as revenge for the Crimeans' choice of reunification with the Russian Federation in 2014.
11. Of course, the blockades put an end to the Mejlis's dreams of having any support among Crimean Tatars living on the peninsula. How can anyone in their sound mind support an organisation that tried to leave their people without water, food and electricity?
12. Both I and other Crimean public activists have repeatedly tried to draw international attention to the falsehood of the information that the Mejlis has disseminated regarding the situation in Crimea, as well as to the devastating consequences and human suffering that the Mejlis' blockade of the peninsula caused:
 - (a) In 2018, [REDACTED] as part of the Crimean delegation, at the OSCE conference in Warsaw to give a presentation on the real situation in Crimea and the blockade imposed by Ukraine and the Mejlis. After [REDACTED]

² TODAY, *Mejlis Refuses to Work with Yanukovich* (30 August 2010), available at: <https://politics.segodnya.ua/politics/medzhlic-otkazaleja-rabotat-c-janukovichem-211454.html> (Exhibit B).

[REDACTED] the microphone was switched off at the request of the Ukrainian delegation;³ [REDACTED]

(b) [REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].⁴

(c) At the UN videoconference in 2020 (“Arria formula” meeting of the Security Council), the Crimean delegation of which [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].⁵

13. The Mejlis’s blockade of Crimea was a direct attempt to make life unbearable for Crimean Tatars, apparently to force them to reverse the choice that our people made in 2014 together with other Crimean residents, i.e. to continue their historical path with Russia.

B. CRIMEAN TATAR REPRESENTATION ISSUES

14. In my view, the real protection of Crimean Tatars is provided not by the Mejlis in Ukraine in the persons of Mustafa Dzhemilev and Refat Chubarov, but by people working in Crimea for the benefit of Crimea and Crimeans.

15. Crimean Tatars are represented both at the level of the Republic of Crimea and at the federal level.

(a) At the level of the Republic of Crimea, the Council of Crimean Tatars under the auspices of the Head of the Republic of Crimea has the mandate to resolve issues of the Crimean Tatar population.

³ TASS, *Media: Crimean Journalists Prevented from Speaking at OSCE Conference in Warsaw* (11 September 2018), available at: <https://tass.ru/politika/5550761> (Exhibit C).

⁴ RIA Novosti, *Journalist Urges OSCE to Respond to International Blockade of Crimea* (17 September 2019), available at: <https://ria.ru/20190917/1558770402.html> (Exhibit D).

⁵ Crimean Newswire, *Water Blockade and Language Rights: What Crimeans Talked About at the UN* (22 May 2020), available at: <https://crimea-news.com/politics/2020/05/22/654978.html> (Exhibit E).

- (b) At the federal level, the Council on Interethnic Relations under the auspices of the President of the Russian Federation, which includes a Crimean Tatar Chingiz Fevzievich Yakubov, is functioning.
16. It should also be noted that Crimean Tatars also represent their people in local elected authorities. In September 2019, more than 200 Crimean Tatars joined representative authorities.
17. Besides, there is a number of public non-governmental organisations in Crimea that cooperate with the competent authorities of the republic. In my opinion, the role of these organisations in protecting Crimean Tatars is mainly to collect opinions and complaints from the population.⁶ The direct implementation of initiatives for the development of the Crimean Tatar community is handled by the federal and regional authorities, which have the necessary resources for that. I am very glad that since 2014 the Crimean Tatars have been living in a welfare state that has both the means and will to improve their life.
18. The Council of the Crimean Tatars under the auspices of the Head of the Republic, unlike the Mejlis, does not take on uncharacteristic functions, but deals with what a representative organisation is created for, i.e. with informing the competent authorities about problems faced by the Crimean Tatar people. It must be said that the Council and other Crimean Tatar organisations perform that function effectively. Since Crimea's reunification with the Russian Federation, the authorities have resolved a number of problems which affected, among others, Crimean Tatars in the period before 2014. They include the allocation of land to Crimean Tatars, the resolution of forced land squatting issues, and the construction of infrastructure, including new educational facilities in the areas of compact settlement of Crimean Tatars. It is important to note that under state funding, social problems are resolved much more effectively: the problems of the population are dealt with by relevant agencies, i.e. professionals, and the budget is transparent and documented.

⁶ See, for example, Saksky District of the Republic of Crimea, *Representatives of the Council of Crimean Tatars under the Auspices of the Head of the Republic of Crimea Visited Saksky District and Saki* (18 September 2018), available at: <http://sakirs.ru/rajonnaya-administratsiya/prioritety-ra/33-press-sluzhba/novosti/3222-predstaviteli-soveta-krymskikh-tatar-pri-glave-respubliki-krym-posetili-sakskij-rajon-i-g-saki> (Exhibit F). Armyansk Urban District, *Public Meeting with Representatives of the Council of Crimean Tatars under the Auspices of the Head of the Republic of Crimea Held in Armyansk* (3 September 2018), available at: http://armgov.ru/sobytiya/v_armyanske_proshla_vstrecha_obwestvennosti_s_predstaviteli_ami_soveta_krymskikh_tatar_pri_glave_respubliki_krym/ (Exhibit G).

C. ACTIVITIES OF THE CRIMEAN TATAR MEDIA

19. Following Crimea's reunification with the Russian Federation, the Russian authorities provided Crimean Tatars with unprecedented assistance to establish their own media. At the initiative of the Head of the Republic of Crimea, the ANO "Crimean Tatar Public Television and Radio Company" was established in 2015, which has provided the basis for a 24-hour television channel "Millet" and a 24-hour Crimean Tatar radio station "Vatan Sedasy".
20. [REDACTED] but I was quite familiar with its activities even when [REDACTED].
21. It is no exaggeration to say that Millet is a unique product for Crimean Tatars. For the first time in the history of the Crimean Tatar community, there is a resource that promotes Crimean Tatar culture and language. During the time I was in charge of Millet, most of the channel's staff were ethnic Crimean Tatars; more than 50% of the channel's own content was in Crimean Tatar – I am sure that these indicators are still being met.
22. Millet airs broadcasts on various aspects of Crimean Tatar culture and history on a daily basis.
23. The channel also takes part in the organisation and coverage of major events dedicated to Crimean Tatar culture: competitions in the traditional Crimean Tatar wrestling Kuresh, the Crimean Tatar festival Khydyrlez, events dedicated to Islamic festivals.
24. As far as I understand, the Ukrainian side indicates Lenur Islyamov's ATR channel, allegedly banned by the Russian Federation, as an alternative to Millet, while trying to present Millet itself as a pro-government channel. In this regard, I can explain the following.
25. First, during the time I [REDACTED] Millet, I never encountered censorship or attempts to interfere in the channel's editorial policy and impose some kind of information agenda. As mentioned, the channel specialises in promoting the Crimean Tatar culture and does so autonomously, conscientiously and consistently.

26. Second, as far as I know, no one forcibly closed ATR. The ATR management made a political move by refusing to go through the media re-registration procedure to obtain a broadcasting license, which is the same for absolutely all mass media, and the channel moved to Kiev.
27. Third, the claim that ATR promoted Crimean Tatar culture is a big exaggeration. Rather, ATR exploited the Crimean Tatar agenda when it was to its owner's advantage. In 2014, Lenur Islyamov together with Mustafa Dzhemilev and Refat Chubarov started cooperating with the Ukrainian authorities and ATR was his "mouthpiece", which had very little to do with covering the life of the Crimean Tatar community. Thus, during the blockade of Crimea, when thousands of Crimean Tatars suffered because of actions of the Mejlis and Ukraine, ATR justified and supported the blockade.⁷ Islyamov himself stated that he was "proud" to be personally involved in the blockade of Crimea.⁸ Islyamov's subversive activities in Crimea were appreciated by the Ukrainian authorities, who repaid Islyamov and ATR's multi-million-dollar debts from the state budget.⁹
28. Fourth, time has shown that ATR TV did not really enjoy the interest of Crimean Tatars. In 2020, ATR was closed due to financial problems.¹⁰ Lenur Islyamov himself admitted that ATR's stories were "not highly rated".¹¹

⁷ See for example, the ATR TV report on the results of the three-year blockade of Crimea. I draw attention to several things: (1) In the story about the food blockade, people living in Crimea are referred to as "enemies" and "occupants" who should stop being "fed". (2) It admits that the Mejlis and personally Refat Chubarov initiated the blockade and refers to the involvement of the Ukrainian nationalist formations Azov, Right Sector, Aydar and others. (3) It admits that the blockade, which condemned thousands of people to a lack of basic necessities (food, water and electricity), was organised to create a debated news event. See YouTube, ATR TV, *The civil blockade of Crimea: how it all started 3 years ago and what the outcome was* (21 September 2018), available at: https://www.youtube.com/watch?v=_2J5XG_qgjs (Exhibit H).

⁸ Ukrinform, *ATR Owner Proud to Be Involved in Crimea's Electricity Blockade* (5 October 2020), available at: <https://www.ukrinform.ru/rubric-crimea/3112326-vladelec-atr-gorditsa-tem-cto-pricasten-k-blokade-elektroenergii-v-krymu.html> (Exhibit I). See also Events.info, *ATR TV Owner Called the Peninsula Blockade the Crimean Maidan* (19 September 2015), available at: <http://web.archive.org/web/20220225040442/http://www.sobytiya.info/news/15/55768> (Exhibit J).

⁹ Crimea Inform, *Ukraine Will Repay Islyamov's Private TV Channel Multimillion-Dollar- Debts from the State Budget* (23 April 2016), available at: <https://www.c-inform.info/news/id/37932> (Exhibit K).

¹⁰ TASS, *Crimean Authorities Commented on the Termination of Broadcasting of ATR TV Channel in Ukraine* (11 February 2020), available at: <https://tass.ru/obschestvo/7732411> (Exhibit L).

¹¹ Youtube, *The Civil Blockade of Crimea: How it All Began 3 Years Ago and What its Outcomes Were* (21 September 2018), available at: https://www.youtube.com/watch?v=_2J5XG_qgjs (Exhibit H).

D. EDUCATION

29. [REDACTED] and have the opportunity to draw conclusions about how the quality of education in Crimea has changed since it became part of the Russian Federation.
30. The question of the quality of education is a complex category, which depends on many subjective factors. One of the objective criteria for comparison can be the material and technical base of the educational institution. In this respect I can say that after the reunification of Crimea with Russia there has been a significant improvement in the material base of the Crimean Federal University. This improvement is manifested both in the digital equipment of the university, in the equipment available to the teaching staff, which allows it to conduct the educational process more effectively, and in the improvement of teachers' living standards through higher salaries.
31. According to numerous accounts of my university colleagues, the quality of education in Crimean universities has increased since Crimea's reunification with Russia, including in areas related to the teaching of the Crimean Tatar language. Both Crimean Federal University (KFU) and Crimean Engineering and Pedagogical University n.a. Fevzi Yakubov (KIPU) have special departments training specialists in the Crimean Tatar and Ukrainian languages and literature. The universities, with the assistance of the authorities, are building new educational buildings and dormitories;¹² purchase new equipment that, among other things, allows holding language classes using modern multimedia materials.¹³ All that testifies to the fact that future Crimean Tatar language specialists are now studying in a much more comfortable and supportive environment.
32. I hereby confirm that, to the best of my knowledge and beliefs, the information set out in this witness statement is true.

¹² RIA Novosti, *Who and When Will Build a New Dormitory for KFU Students in Simferopol* (5 December 2022), available at: <https://crimea.ria.ru/20221205/kto-i-kogda-postroit-novoe-obschezhitie-dlya-studentov-kfu-v-simferopole-1125687137.html> (Exhibit M).

¹³ KFU, *New Multimedia Technology Presented at KFU* (28 January 2016), available at: <https://cfuv.ru/news/v-kfu-prezentovali-novuyu-multimedijjnuyu-tehniku> (Exhibit N).

Witness

[Signature] _____



Simferopol, 7 March 2023

LIST OF EXHIBITS

Number:	Name of exhibit:
Exhibit A	Ukraine.ru, <i>Dzhemilev and the West try to prevent Crimea from joining Russia</i> (28 November 2014).
Exhibit B	TODAY, <i>Mejlis refuses to work with Yanukovich</i> (30 August 2010).
Exhibit C	TASS, <i>Media: Crimean Journalists Were Prevented from Speaking at the OSCE Conference in Warsaw</i> (11 September 2018).
Exhibit D	RIA Novosti, <i>Journalist Urges the OSCE to Respond to International Blockade of Crimea</i> (17 September 2019).
Exhibit E	Crimean Newswire, <i>Water Blockade and Language Rights: What Crimeans Talked About at the UN</i> (22 May 2020).
Exhibit F	Municipal Entity Saksy District of the Republic of Crimea, <i>Representatives of the Council of Crimean Tatars under the Auspices of the Head of the Republic of Crimea Visited Saksy District and Saki</i> (18 September 2018).
Exhibit G	Municipal Entity Armyansk Urban District, <i>Public Meeting with Representatives of the Council of Crimean Tatars under the Auspices of the Head of the Republic of Crimea Held in Armyansk</i> (3 September 2018).
Exhibit H	YouTube, ATR TV, <i>The Civil Blockade of Crimea: How it All Started 3 Years Ago and What the Outcome Was</i> (21 September 2018).
Exhibit I	Ukrinform, <i>ATR Owner Proud to Be Involved in Crimea's Electricity Blockade</i> (5 October 2020).
Exhibit J	Events.info, <i>ATR TV Owner Called the Peninsula Blockade the Crimean Maidan</i> (19 September 2015).
Exhibit K	Crimea Inform, <i>Ukraine Will Repay Islyamov's Private TV Channel Multimillion-Dollar Debts from the State Budget</i> (23 April 2016).

- Exhibit L TASS, *Crimean Authorities Commented on the Termination of Broadcasting of ATR TV Channel in Ukraine* (11 February 2020).
- Exhibit M RIA Novosti, *Who and When Will Build a New Dormitory for KFU Students in Simferopol* (5 December 2022).[_](#)
- Exhibit N KFU, *New Multimedia Technology Presented at KFU* (28 January 2016).

Exhibit A

Ukraine.ru, *Dzhemilev and the West try to prevent Crimea from joining Russia*
(28 November 2014)

(translation)

Translation

Ukraine.ru, *Dzhemilev and the West Try to Prevent Crimea from Joining Russia* (28 November 2014), available at: <https://ukraina.ru/20141128/1011319376.html>.

Ukraina.ru

Dzhemilev and the West Try to Prevent Crimea from Joining Russia

By Vasip Muravitsky, Ukraina.ru

28 November 2014 at 04:43 PM



© RIA Novosti. Grigory Vasilenko

On the 12th of November, Mustafa Dzhemilev announced his intention to create a Crimean Tatar territorial defence battalion. According to him, he discussed this with Ukrainian President Petro Poroshenko. Mr. Dzhemilev said about 450 ethnic Crimean Tatars are fighting for Kyiv in Donbass and their families in Crimea are in danger. That is why their names should be classified. At the same time, Mr. Dzhemilev handed over to the Ukrainian Prosecutor General's Office a list of almost 400 people allegedly infringing human rights in Crimea.

Fearing for the families of those fighting Tatars, he, nevertheless, denounced his opponents whose relatives may be in Mainland Ukraine to the Ukrainian Prosecutor General's Office. Making his statement about the planned creation of an ethnic battalion, which the German newspaper *Der Freitag*, citing the ARD TV channel, called an "Islamic State" battalion, Mr. Dzhemilev did not fail to say that the future of the Crimean Tatar people is with "an

independent and strong Ukraine”. Today, *Al-Jazeera* released another publication repeating all the myths about Crimean Tatars, alleging that they were mercilessly oppressed, kidnapped and prevented from developing their culture. However, while quoting the detained Tatars whose house was searched, *Al-Jazeera* forgot to mention that all of them are members of a radical Islamist organisation banned in the homeland of the *Al Jazeera*’s founders.



© RIA Novosti. Konstantin Chalabov

Tatar “refugees” from Crimea are members of Hizb ut-Tahrir

Hizb ut-Tahrir and the Mejlis clashed on the basis of their conflict of ideas of statehood in recent years in Crimea. Banned in many countries of the world, including Russia, and allowed in Ukraine, Hizb ut-Tahrir wants to build a worldwide Islamic Caliphate where the Caliph will revive Islam on Earth. The Mejlis conflicted with Hizb ut-Tahrir not only for power but also on ideological grounds: the organisation led by Mr. Dzhemilev and Mr. Chubarov dreams of building a Crimean Tatar national state rather than of an independent and strong Ukraine.

When Crimea became part of Russia, it fell under the jurisdiction of the laws of the Russian Federation, one of which prohibits Hizb ut-Tahrir in the country. That’s when Tatar “refugees” fondled by the Ukrainian Kyiv-based TV channels flew from Crimea. While showing the “sufferings” of the humiliated Tatars, the Kyiv media ignored the fact that, against the background of anti-Russian hysteria around Crimea, the Tatars did not stay in Ukraine but began to emigrate to EU countries such as Germany where there is a large Turkish community close to them.

The Mejlis does not represent the entire Crimean Tatar people

However, *Al-Jazeera* and most Ukrainian and even Russian media present the Mejlis as an unconditional representative of the interests of Crimean Tatars, which has been far from truth so for a long time.

The Mejlis is a political organisation founded in the Soviet times, something like Vyacheslav Chornovil's People's Rukh of Ukraine. It only represented the Crimean Tatar people for the purpose of increasing nationalist movements in the USSR, and while more than 90% Crimean Tatars supported the Mejlis at the time of the collapse of the Union, the number of its supporters has dramatically decreased now. In 2013, the Mejlis was opposed by the Tatar organisation *Milliy Firqa* and by the radical organisation Hizb ut-Tahrir, which emigrated from the peninsula after it was annexed by Russia. For example, Vasvi Abduraimov, a well-known Crimean Tatar politician, recently stated that "in the early 1990s, this support [for the Mejlis] amounted to 90%, but today it is only 18%. These 18-20% of Crimean Tatars, perhaps, support Euromaidan, while other 60-70% are apolitical and are fully engaged in efforts to survive and maintain their families because, unlike all the others, they began to live in Crimea from different starting conditions, and still other 10-15% are actively opposing Euromaidan".



© *RIA Novosti*. Taras Litvinenko

Even these facts help to understand that not all Crimean Tatars support the Mejlis, and, given the fact that there are only about 300,000 Crimean Tatars residing on the peninsula, the real support for the Mejlis appears to be miserable.

Dzhemilev is a Ukrainian politician, not a Tatar one...

Mustafa Dzhemilev has never been a Crimean Tatar national politician. He began his career as an anti-Soviet politician and a dissident and has never changed his political views. He is not really interested in representing Crimean Tatars as his goal is to destruct the common Russian-Ukrainian cultural and economic space. That is why he has spent most of his political life in Kyiv as a member of certain Ukrainian nationalist political parties rather than in Crimea. It may seem surprising, but Mr. Dzhemilev is a Ukrainian nationalist politician of the Crimean Tatar origin and has no right to represent this once nomadic ethnic group. Moreover, he is one of the most “experienced” members of the Verkhovna Rada, the Parliament of Ukraine, and used to spend most of his time in Kiev rather than in Crimea even before he was expelled from the peninsula.



© *RIA Novosti*. Eygene Kotenko

Being part of the central vertical of power for more than 20 years of his membership of the Verkhovna Rada, Mr. Dzhemilev could not or did not want to achieve the official status for the Crimean Tatar language in Crimea. Moreover, not even a decent textbook has been created over those the years to teach that language in schools. Once the Mejlis was the presidium of the Kurultai, a congress of representatives of the Crimean Tatar people. But it had not performed its real representative functions for a long time but only for a few years beginning from 1990. Further, the Mejlis was literally privatised and became a private entity serving Mustafa Dzhemilev’s political interests.

While criticising Russia, Mr. Dzhemilev is afraid to mention the fact that the Crimean Tatar is now one of the three official languages in Crimea, the Crimean Tatar holidays are now celebrated as official public holidays on the peninsula, and the Kurultai has been officially recognised for the first time in the 20 years following the return of the Crimean Tatars to

Crimea. What prevented Mustafa Dzhemilev from achieving official rights for the Kurultai during the entire period of Ukraine's independence, and what allowed Russia to do this? The answer is simple: this issue had never been paramount for Mustafa Dzhemilev.

Mr. Dzhemilev's assertion that the future of the Crimean Tatars is a strong and independent Ukraine contains a huge share of cunning. Unlike, by the way, Hizb ut-Tahrir, the Mejlis stands for building a powerful and independent Crimean Tatar state. It would be quite logical to think that such a state should be independent from Ukraine, too.

A further, apparently inevitable and complete administrative and legal merger of Crimea and Russia will begin from the 1st of January 2015. That is why Mr. Dzhemilev's speeches are becoming more and more aggressive and he is getting support from the West.

Mustafa Dzhemilev is an agent of influence of the West rather than of the Crimean Tatar people. Real representatives of this ethnic group, but not fake ones, should emerge very soon.

Exhibit B

TODAY, *Mejlis refuses to work with Yanukovych* (30 August 2010)

(translation)

Translation

TODAY, *Mejlis Refuses to Work with Yanukovych* (30 August 2010), available at: <https://politics.segodnya.ua/politics/medzhlic-otkazalcja-rabotat-c-janukovichem-211454.html>.

Segodnya

Mejlis Refuses to Work with Yanukovych

The President was urged to return to the previous principle of forming the Council of Representatives of the Crimean Tatar People.

Delegates of the Qurultay, the national congress of the Crimean Tatars, call on Ukrainian President Viktor Yanukovych to return to the previous principle of forming the Council of Representatives of the Crimean Tatar People, delegation by Tatars instead of appointment by the head of state.

The Qurultay made this decision on Sunday in Simferopol.

Until the Ukrainian leader does this, the members of the Mejlis will not intend to participate in the work of this Council, Mustafa Dzhemilev, the head of the Mejlis, told reporters upon completion of the Qurultay proceedings.

“After people are appointed to this Council, they no longer have the right to say anything on behalf of the Crimean Tatar people. The resolution calls on the President to revise [the principle forming the council of representatives of the Crimean Tatar people] with due regard for the requirements of both the Constitution and international laws, in particular the UN Declaration on the Rights of Indigenous Peoples, which clearly states that authorities should only interact with indigenous peoples through their legitimately elected representative bodies”, the Mejlis’ leader said.

However, he noted the Qurultay tried to “avoid a confrontational tone” when drawing up its resolution.

“Many delegates said that they should crisply state that they will not participate in this Council, but then they explained that, as appears from the very text [of the resolution], the Mejlis of the Crimean Tatar People will not participate in this Council”, Mr. Dzhemilev said.

According to him, the members of the Mejlis and the delegates of the Qurultay, who occupy 9 of the 19 seats in the Council of Representatives of the Crimean Tatar People, will not go to the meeting to be convened in the next two weeks by Vasyl Dzharty, Chairman of the Crimean Government, on instructions from President Yanukovych.

As reported, President Yanukovych on the 26th of August signed his decree titled “On Matters of the Council of Representatives of the Crimean Tatar People”, which reduced the composition of the Council from 33 to 19 members and included in the Council a number of politicians opposed to the Mejlis. According to the Decree, the composition of the Council shall be subject to approval by the head of state.

Exhibit C

*TASS, Media: Crimean Journalists Were Prevented from Speaking at the OSCE Conference in
Warsaw (11 September 2018)*

(translation)

Translation

TASS, *Media: Crimean Journalists Were Prevented from Speaking at the OSCE Conference in Warsaw* (11 September 2018), available at: <https://tass.ru/politika/5550761>.

11 September 2018 at 01:35 PM

Media: Crimean Journalists Were Prevented from Speaking at the OSCE Conference in Warsaw

After Ervin Musayev, Director of *Millet*, a Crimean Tatar TV channel, came to the rostrum and introduced himself as “Republic of Crimea, Russia”, three countries protested.

Simferopol, 11 September, *TASS*. Crimean journalists were disallowed to speak at the OSCE conference in Warsaw on the observance of human rights, *Krym-24* TV channel, whose film crew is working at the conference, reported on Tuesday.

“After Ervin Musayev, Director of *Millet*, a Crimean Tatar TV channel, came to the rostrum and introduced himself as “Republic of Crimea, Russia”, three countries protested: Ukraine, Canada, and Austria. Ervin’s microphone was immediately turned off”, *Krym-24* said.

Krym-24 noted that the other members of the Crimean delegation were not even allowed to come to the rostrum as their presentations were removed from the agenda in advance.

According to earlier reports, the Crimean delegation includes journalists and members of the Crimean Public Chamber.

Last year, the speech of Andrey Trofimov, Chairman of the Crimean Branch of the Russian Union of Journalists, at the OSCE conference on media freedom was also interrupted at the insistence of the members of the Ukrainian delegation.

After the *coup d'état* in Ukraine in February 2014, the authorities of Crimea and the city of Sevastopol held a referendum on reunification with Russia. More than 80% of the eligible voters in both regions took part in that referendum, and 96.7% of those voters in Crimea and 95.6% in Sevastopol voted for reunification with Russia. On 18 March 2014, Russian President Vladimir Putin signed a treaty on the admission of the Republic of Crimea and the city of Sevastopol to the Russian Federation, which was ratified by the Federal Assembly on the 21st of March. Despite the convincing results of the referendum, Kyiv refused to recognise Crimea as part of Russia.

Exhibit D

RIA Novosti, *Journalist Urges the OSCE to Respond to International Blockade of Crimea*
(17 September 2019)

(translation)

Translation

RIA Novosti, *Journalist Urges the OSCE to Respond to International Blockade of Crimea* (17 September 2019), available at: <https://ria.ru/20190917/1558770402.html>.

RIA Novosti

17 September 2019 at 02:31 PM

Journalist urges the OSCE to respond to international blockade of Crimea



© *RIA Novosti* / Konstantin Mikhailchevsky

Swallow's Nest Castle on a coastal rock in the village of Gaspra, Crimea. Archival photo

Simferopol, 17 September, *RIA Novosti*. Ervin Musayev, General Director of *Millet*, a Crimean Tatar public TV and radio company, called on the OSCE to work more actively with Crimea and respond to the international blockade of the peninsula.

Mr. Musayev arrived in Warsaw as a member of the Crimean delegation to take part in the OSCE conference on human rights.

“In my speech, I called on the OSCE to pay attention to a number of vital issues facing the Crimeans, one of which is the international blockade. Ukraine ignored the need to respect human rights by imposing water, transport and energy blockades for the inhabitants of Crimea. Why were other countries silent? Or does a blockade become an international standard?”, Mr. Musayev told *RIA Novosti*.

According to him, despite the fact that Crimea has successfully overcome all the blockades, they must be judged internationally. “We have coped with this and are moving forward”, Mr. Musayev stressed.

He noted that the OSCE should judge the ban on Crimean residents to travel with Russian passports to a number of Western countries.

“Such double standards in respect of Crimea contradict the fundamental principles of this organisation. I urge [the other countries] to follow the examples of China, Turkey and Saudi Arabia, who are actively dealing with Crimea and issuing visas to its residents”, the journalist said.

Exhibit E

Crimean Newswire, *Water Blockade and Language Rights: What Crimeans Talked About at the UN* (22 May 2020)

(translation)

Translation

Crimean Newswire, *Water Blockade and Language Rights: What Crimeans Talked About at the UN* (22 May 2020), available at: <https://crimea-news.com/politics/2020/05/22/654978.html>.



Crimean News

Water Blockade and Language Rights: What Crimeans Talked About at the UN

22 May 2020 at 12:55, Politics



Simferopol, 22 May, *RIA Novosti (Crimea)*. During a UN Security Council Arria formula meeting, representatives of the Crimean public once again confirmed that the merger of Crimea into Russia was a conscious choice made by an overwhelming majority of Crimeans. The participants of the videoconference stressed that their freedoms in Russian Crimea are respected, while pointing to the infringement of their rights by the Ukrainian state.

On the night of 21-22 May 2020, the Permanent Mission of Russia to the UN held an informal video conference of the Security Council with participation of residents of Crimea in accordance with the so-called “Arria formula”. Such meetings are not directly attributed to the events held by the Security Council and imply consultations which not only diplomats but also representatives of non-governmental organisations and the public may be invited to.

The meeting was attended by representatives from more than 30 countries. Esadullah Bairov, Deputy Mufti of Crimea, Anastasia Gridchina, head of the Ukrainian community on the Crimean Peninsula, Ervin Musayev, a member of the Bakhchysarai Town Council, and Alexander Makar, a journalist and TV presenter, spoke at the conference.

Speaking on air on *Radio Sputnik* in Crimea, Anastasia Gridchina noted that the past video conference became “a unique opportunity for Crimeans to speak and convey their point of view to the world community”. She recalled that Crimeans were disallowed to speak at the last UN Security Council Arria formula meeting arranged for by the Ukrainian side.

According to Ms. Gridchina, her speech concerned the observance of the linguistic and cultural rights of Ukrainians in Crimea as well as the oppression of the Russian language in Ukraine. She noted that a representative of Germany was most active, asking many questions to the representatives of Crimea and thereby greatly enlivening the discussion. In particular, he asked about the legitimacy and legality of the 2014 referendum and the attitude of the Crimeans to joining Russia.

“We communicate with representatives of international organisations on a regular basis, and, unfortunately, we hear the same rhetoric in the United Nations, the OSCE and other venues. The words spoken by representatives of Western countries have not changed since 2014 and

are repeated from year to year. People rely on superficial information and have no objective details. Therefore, I am not willing to say we have reached out to them somehow”, Ms. Gridchina said.

In turn, Ervin Musayev, a member of the Bakhchysarai Town Council and a public figure, called upon the UN Security Council to respond to the water blockade of Crimea by the Ukrainian authorities.

“This topic is rarely covered by world media. But there are a lot of things to talk about. How could they cut off the water and electricity supply to 2.5 million people in the 21st century? For six years, Crimea has not been receiving water through the North Crimean Canal. All this runs counter to the foundations of international law. I am sure the UN should find resources to resolve this issue”, *RIA Novosti* quoted Mr. Musayev as saying.

According to him, the issue of the water supply to Crimea should be resolved with due regard for the fact that the peninsula is part of the Russian Federation.

Exhibit F

Municipal Entity Saksy District of the Republic of Crimea, *Representatives of the Council of Crimean Tatars under the Auspices of the Head of the Republic of Crimea Visited Saksy District and Saki* (18 September 2018)

(translation)

Translation

Saksky District of the Republic of Crimea, *Representatives of the Council of Crimean Tatars under the Auspices of the Head of the Republic of Crimea Visited Saksky District and Saki* (18 September 2018), available at: <http://sakirs.ru/rajonnaya-administratsiya/priority-ra/33-press-sluzhba/novosti/3222-predstaviteli-soveta-krymskikh-tatar-pri-glave-respubliki-krym-posetili-sakskij-rajon-i-g-saki>.

Representatives of the Council of Crimean Tatars under the Auspices of the Head of the Republic of Crimea Visited Saksky District and Saki



The representatives of the Council of Crimean Tatars under the Head of the Republic of Crimea visited the town of Saki and the Saki District to meet with local public leaders.

During the working meeting, they spoke about the key goals and objectives of their work and discussed the major topics of concern to the residents, namely the development of the Crimean Tatar language and culture, the registration of land plots and religious buildings, and the development of the district and town infrastructures.



One of the key goals of the visit was to promote active cooperation between the Council and the population, to consider the major topics and to study and solve problematic issues.

The opening speech was delivered by Eskender Bilyalov, a member of the Presidential Council for Interethnic Relations and President of Inkishaf Society of Crimean Tatars (a Russian public organisation). “The Saki District and the town of Saki are set as an example in matters of interethnic relations in the Republic. Not a single unauthorised acquisition of lands has taken place in the Saki District. I present to you the Council of Crimean Tatars, which is headed by Sergey Aksyonov, Head of the Republic of Crimea, himself. The Council is intended to work to better understand those issues facing the Tatars in Crimea”.

“That is why we are now travelling to various regions to reveal and discuss matters of concern to people”, said Ayder Adzimambetov, Executive Secretary of the Crimean Mufti.



Ayder Emirov, a research fellow at the Research Institute of the Crimean Tatar Philology and the History and Culture of Crimean Ethnic Groups of the Crimean Engineering and Pedagogical University (a state budgetary higher educational institution of the Republic of Crimea), told the stories of some Crimean Tatars who were heroes of the Great Patriotic War and have deserved but never received their awards, raising the issues of perpetuating the memory of the dead.

Lemara Selendili, Doctor of Philology and Professor of the Department of the Crimean Tatar Philology of the Faculty of the Crimean Tatar and Oriental Philology at the Taurida Academy of the V.I. Vernadsky Crimean Federal University (a federal autonomous state higher educational institution), raised the problem of the Crimean Tatar language. “The Council was established to resolve the problematic issues of small peoples, and the Crimean Tatar people are the most numerous among the small peoples – it is an indigenous people of Crimea”, she said. “Our task is to enable the implementation of the Crimean Tatar language as the state language”. She used as an example the Bakhchysarai District where the bus stop signs are written in both Russian and Crimean Tatar.

The meeting continued as a dialogue, with those present asking questions of concern to them and receiving competent and exhaustive answers.



Galina Miroshnichenko, Head of the Saki District Administration, summed up the results of the meeting. “I am sure, there are no interethnic problems in the Saki District. If any issues arise, we convene our National Council – we have competent advisers such as Eskender Bilyalov and Mesfer Settarov, and solve all those issues in a calm atmosphere”, she said.

The meeting was attended by Galina Miroshnichenko, Head of the Saki District Administration; Andrey Ivkin, Head of the Saki Town Administration; Eskender Bilyalov, a member of the Presidential Council for Interethnic Relations and President of Inkishaf Society of Crimean Tatars; Ayder Emirov, a research fellow at the Research Institute of the Crimean Tatar Philology and the History and Culture of Crimean Ethnic Groups of the Crimean Engineering and Pedagogical University; Ayder Adzhimambetov, Executive Secretary of the Crimean Mufti; Lemara Selendili, Doctor of Philology and Professor of the Department of the Crimean Tatar Philology of the Faculty of the Crimean Tatar and Oriental Philology at the Taurida Academy of the Vladimir Vernadsky Crimean Federal University; Tamila Abduvelyeva, secretary of the meeting; the deputy heads of the Saki Town and District Administrations; members of the Saki Town and District Councils; Mesfer Settarov, Saki District Imam and Imam of the Yany Jami Cathedral Mosque in Saki; representatives of the administrations of rural settlements of the Saki District; the heads of structural subdivisions of the Saki District and Saki Town Administrations; representatives of the Centre of Culture, Arts and Folk Arts of the Saki Town and Saki District; business people and agricultural producers from the town of Saki and the Saki District; and representatives of the media established by the Spiritual Direction of the Muslims of Crimea.

Section of Organisational and Information Work of the Administration Office

Public discussions

Exhibit G

Municipal Entity Armyansk Urban District, *Public Meeting with Representatives of the Council of Crimean Tatars under the Auspices of the Head of the Republic of Crimea Held in Armyansk*
(3 September 2018)

(translation)

Translation

Armyansk Urban District, *Public Meeting with Representatives of the Council of Crimean Tatars under the Auspices of the Head of the Republic of Crimea Held in Armyansk*

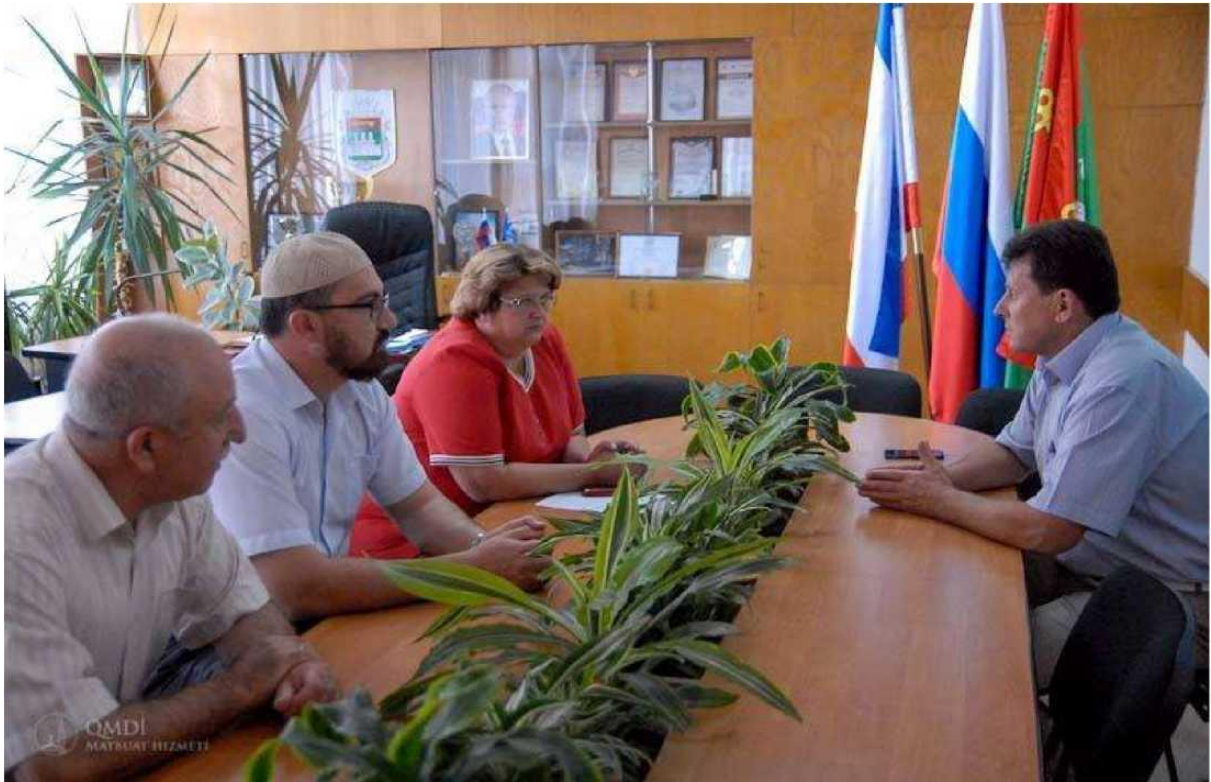
(3 September 2018), available at:

http://armgov.ru/sobytiya/v_armyanske_proshla_vstrecha_obwestvennosti_s_predstavit_elyami_soveta_krymskih_tatar_pri_glave_respubliki_krym/.

Public Meeting with Representatives of the Council of Crimean Tatars under the Auspices of the Head of the Republic of Crimea Held in Armyansk

3 September 2018

In order to restore historical justice and facilitate the political, social and spiritual revival of those Crimean Tatars subjected to illegal deportation and political repression on a national basis, Sergey Aksyonov, the Head of the Republic of Crimea, by his Decree No. 93-U dated 29 March 2018 “On the Establishment of the Council of Crimean Tatars under the Head of the Republic of Crimea” established the Council of Crimean Tatars under the Head of the Republic of Crimea, consisting of 15 members. The key tasks of the Council are to develop and implement a set of measures to restore historical justice and facilitate the political, social and spiritual revival of the Crimean Tatars in accordance with Russian Federation Presidential Decree No. 268 dated 21 April 2014 “On Measures to Rehabilitate the Armenian, Bulgarian, Greek, Italian, Crimean Tatar and German Peoples and Governmental Support for Their Revival and Development”, RSFSR Laws No. 1107-1 dated 26 April 1991 “On the Rehabilitation of Repressed Peoples” and No. 1761-1 dated 18 October 1991 “On the Rehabilitation of Victims of Political Repression” and Article 10 of the Constitution of the Republic of Crimea, as well as to enable the full integration of the Crimean Tatars into the multinational and multi-confessional community of Russia, identify and analyse the issues facing the Crimean Tatars in the Republic of Crimea that need to be resolved in accordance with Russian Federation Presidential Decree No. 268 dated 21 April 2014 “On Measures to Rehabilitate the Armenian, Bulgarian, Greek, Italian, Crimean Tatar and German Peoples and Governmental Support for Their Revival and Development” and RSFSR Laws No. 1107-1 dated 26 April 1991 “On the Rehabilitation of Repressed Peoples” and No. 1761-1 dated 18 October 1991 “On the Rehabilitation of Victims of Political Repression”, and review the effectiveness and completeness of the implementation of measures to restore historical justice and facilitate the political, social and spiritual revival of the Crimean Tatars in the Republic of Crimea in accordance with Russian Federation Presidential Decree No. 268 dated 21 April 2014 “On Measures to Rehabilitate the Armenian, Bulgarian, Greek, Italian, Crimean Tatar and German Peoples and Governmental Support for Their Revival and Development” and RSFSR Laws No. 1107-1 dated 26 April 1991 “On the Rehabilitation of Repressed Peoples” and No. 1761-1 dated 18 October 1991 “On the Rehabilitation of Victims of Political Repression”.



On the 30th of August, the administration of the town of Armyansk in the Republic of Crimea hosted a meeting of Armyansk residents with members of the Council of Crimean Tatars under the Head of the Republic of Crimea.



The meeting was attended by the following members of the Council of the Crimean Tatar people under the Head of the Republic of Crimea: Ayder Emirov, a journalist, a publicist and the first director of the Ismail Gasprinsky Library; Ayder Ismailov, Deputy Mufti of Crimea

and Master of Islamic Law; Zera Emirsuin, Press Secretary of the Spiritual Direction of the Muslims of Crimea and Sevastopol; Armyansk religious clerics; the CEOs of various businesses, institutions and organisations based in Armyansk; and local activists. They discussed matters of teaching Crimean Tatar children their native language, providing the local general education libraries with textbooks in the Crimean Tatar language, restoring toponymic names of settlements and some other matters of interest to the residents of our town.

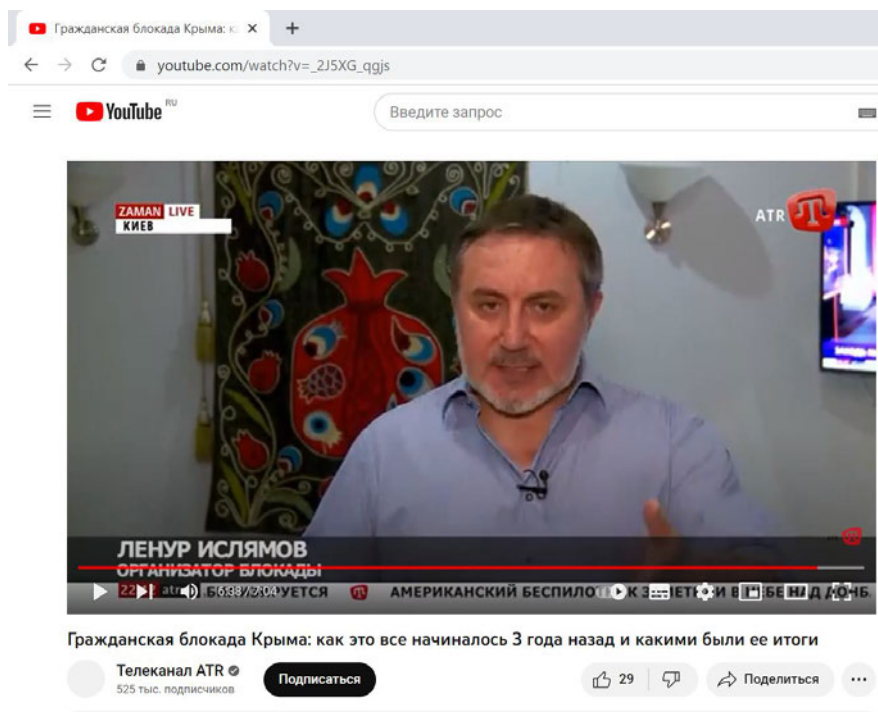
Exhibit H

YouTube, ATR TV, *The Civil Blockade of Crimea: How it All Started 3 Years Ago and What the Outcome Was* (21 September 2018)

(translation)

**Transcript
Translation**

YouTube, ATR TV, *The civil blockade of Crimea: how it all started 3 years ago and what the outcome was* (21 September 2018), available at: https://www.youtube.com/watch?v=_2J5XG_qgjs.



[00:00]

[Host]: “Stop feeding the occupier!” - This was the slogan with which the trade blockade of Crimea began three years ago on 20 September 2015. It was initiated by the Mejlis. Crimean Tatar leaders decided to stop trade with the enemy. They allowed only cars to enter the peninsula from Crimea, completely blocking truck traffic. How did it all begin? And what were the consequences of this action? My colleagues will tell you.

[00:28]

[Voice-over]: On 20 September 2015, at noon sharp, civic activists block 3 checkpoints into occupied Crimea: Chongar, Kalanchak and Cheplinka. Anti-vehicle hedges and tyres are deployed at the administrative border of mainland Ukraine in occupied Crimea. People with Ukrainian and Crimean Tatar flags walk continuously along the pedestrian crossing. From now on, it is only possible to get in and out of the peninsula by car or on foot. Trucks carrying goods to the peninsula queue up for kilometres. With some drivers, emotions fly high.

[01:00]

[Driver]: Where should I go? Am I going to stick here, live here? I need to go to Genichesk. I live there. Am I driving on my own?

[01:08]

[Refat Chubarov]: I don't want you to feed those bandits who kill our people. That's it! You will not feed them.

[01:15]

[Voice-over]: Stop feeding the occupier - this is the principled position of the organizers of the blockade of Crimea. The Mejlis of the Crimean Tatar people has stopped the supply of goods to the occupied peninsula.

[01:23]

[Refat Chubarov]: It is unacceptable that our goods should be supporting the occupying power, especially the military garrisons, which they have set up all over Crimea. Let them think how they are going to bring food from mainland Russia instead of tanks.

[01:40]

[Voice-over]: Over time, the blockers were joined by the Right Sector, Azov Civil Corps activists and hundreds of patriotically-minded people. Half a thousand activists guarded the administrative border with Crimea every day.

[01:52]

[Evelina Arifova]: Here, if you remember all the emotions you had back then. It's unreal to describe, because my heart was bursting out of my chest. There was such a fountain of patriotism, when you wanted to do everything possible for Crimea. Someone showed their talents, who could cook - cooked, who could build - built.

[02:12]

[Voice-over]: This poster contains almost the entire history of the blockade of Crimea. It was created by Evelina Arifova, now a member of the 'Asker' civic formation. From the first days of blockade she was on duty. It contains names, messages, autographs of those who together wrote the newest history of the annexed peninsula.

[02:30]

[Lenur Islyamov]: That's from Donbass here, it says: '27.09'. Here, that's his signature. Enver's, that is, his name is Enver Kutia. Here, his signature; he is still here with us now. That's Amina who is not here anymore, she is dead now. Here, she wrote: '25.09.2015. Amina Tatar Bandera.' She is, unfortunately, no longer with us. Here we have: Azov, Right Sector. Here, Vorobey Cossack - the biggest patriot of Ukraine. Here [unintelligible]. Before that, here, Aydar. Those are from Turkey, who came here: Rambo, Serbes Turklesov, Lagov.

[03:08]

[Voice-over]: Lenur Islyamov, the organiser of the blockade, recalls that in those days the phone was ringing off the hook with people wanting to help.

[03:15]

[Lenur Islyamov]: People called, saying: ‘Hold on!’ People called and said: ‘Come on, where can I transfer money to?’ You have to give credit to those people who came and worked completely as volunteers, as cooks. They helped, washed, cleaned and served. It was very hard work! Doctors came. Doctors who stayed with us. The only thing we didn’t have was childbirth. But there were even weddings. Really, energy was everywhere. People were all on fire.

[03:41]

[Voice-over]: However, not everyone was so enthusiastic. Ukrainian business at the time, which had close relations with the already annexed Crimea, was in no way willing to lose billions of dollars in revenue. So threats to the organizers of the blockade were pouring in every day.

[03:56]

[Lenur Islyamov]: They pushed business cards of some secret service officers in our hands in the vans: ‘Here, please, we are from that man.’ Yanukovich was no longer there, but business was still operating by those laws. I grew up in that time, I was setting up my business in the time of banditry. That is why, when people threaten me, I’m not afraid of such people. It is much more difficult with people who quietly do their business.

[04:18]

[Voice-over]: The leader of the Crimean Tatar people, Mustafa Dzhemilev. Then in 2015 he was at the forefront of the blockade of Crimea.

[04:26]

[Mustafa Dzhemilev]: In the history of world wars, it had never happened that a partially occupied country continued to supply the occupier with everything it needed. That happened here because many people did not give a fig about the territorial integrity of their country, about the dignity of the country. The main thing for them was to make money.

[04:44]

[Voice-over]: Empty shelves in shops, rising prices on markets - Ukrainian goods stopped coming to Crimea. Two weeks after the blockade began, high-voltage lines supplying electricity to the peninsula began to fall down. On 22 November, unknown persons damaged the last tower. The next day, the occupation authorities declared a state of emergency in Crimea. The lights went out, mobile phone service was cut off, and people did not go to work. Recalling that time, Mustafa Dzhemilev says that the blockade was the only right answer to the challenges of reality. Crimea returned to the global political agenda, and the Cabinet of Ministers officially banned the movement of cargo vehicles across the administrative border after an appeal by the president. Sanctions against Russia for the annexation of the peninsula, including trade sanctions, were imposed by almost all EU countries and the US.

[04:26]

[Mustafa Dzhemilev]: They talked about the blockade, but at the same time they talked about how it had happened – the occupation of Crimea. Thousands and tens of thousands of publications all over the world. This is the subject that was understood in Crimea. And the main point of our strategy, as long as we do not contemplate military liberation of Crimea, is to make the maintenance of the occupied territory of Crimea as expensive as possible for Russia. And we have achieved that goal too.

[06:15]

[Voice-over]: On 31 December, activists removed all roadblocks at checkpoints with occupied Crimea. In another year, the trade blockade of Crimea will be hailed in Ukraine and around the world as the first most effective step to begin de-occupation. But there are many more steps ahead. The main one is granting autonomy to Crimean Tatars.

[06:36]

[Lenur Islyamov]: The pace we maintained since the blockade, we must keep it up. The ATR TV channel that airs news every day. It is like an information bomb that flies out of the mainland and hits right on target because we are telling the truth about what is happening in Crimea. It is not highly visible and doesn't bring in cash, but it is very important politically for those people who are now in this hostage situation in Crimea.

Exhibit I

Ukrinform, *ATR Owner Proud to Be Involved in Crimea's Electricity Blockade* (5 October 2020)

(translation)

Translation

Ukrinform, *ATR Owner Proud to Be Involved in Crimea's Electricity Blockade* (5 October 2020), available at: <https://www.ukrinform.ru/rubric-crimea/3112326-vladelec-atr-gorditsa-tem-cto-pricasten-k-blokade-elektroenergii-v-krymu.html>.

ATR Owner Proud to Be Involved in Crimea's Electricity Blockade

By Ukrinform

Lenur Islyamov, the owner of the ATR TV channel, is confident that Russia will be tried in international courts for violating the territorial integrity of Ukraine because the entire civilised world is talking about the occupation of Crimea by the Russian Federation.

Mr. Islyamov said this at a briefing at the Ukrainian Ministry of Foreign Affairs on Monday, an *Ukrinform* correspondent reports.

“They are trying to prove that our statements encroached on the territorial integrity of the Russian Federation. I use this venue to declare that not only Lenur Islyamov but the entire civilised world says the Crimea is occupied and this is an illegal violation of the territorial integrity of the [Ukrainian] state, so Russia will be prosecuted in international courts”, he said.

As for the Russian accusations of Mr. Islyamov of organising the blockade of the power supply of the peninsula, he said he was proud to be involved in this decision.

“Now as regards the fact that I am accused of blocking the power supply of Crimea. There are different times and periods in people's lives sometimes you want to forget about, but this is the time I just want to be proud of because the best citizens of Ukraine did not allow electricity to be supplied to Crimea... I am proud of what we did, and I am proud of the decisions made at that time”, Mr. Islyamov said.

The so-called “Prosecutor's Office of Crimea” reportedly charged Mr. Islyamov under three articles of the Criminal Code of Russia, *viz.* “organisation of an illegal armed formation”, “preparation and commission of acts of sabotage” and “public calls to violate the territorial integrity of Russia”.

Furthermore, according to lawyer Nikolay Polozov, Russian authorities are trying to claim against Mr. Islyamov RUB 1 bln (about USD 130-140 mln) in damages allegedly caused to Russia by the loss of electricity resulting from the power supply blockade of Crimea by Mainland Ukraine.

Exhibit J

Events.info, *ATR TV Owner Called the Peninsula Blockade the Crimean Maidan*
(19 September 2015)

(translation)

Translation

Events.info, *ATR TV Owner Called the Peninsula Blockade the Crimean Maidan* (19 September 2015), available at: <http://web.archive.org/web/20220225040442/http://www.sobytiya.info/news/15/55768>.

ATR TV Owner Called the Peninsula Blockade the Crimean Maidan

By Krym.Realii

Lenur Islyamov, the businessman who owns the Crimean Tatar TV channel *ATR*, believes no business may be run with the occupied Crimea.

He made this statement the day before, on the 18th of September in Henichesk, at a meeting of the coordination council on the blockade of Crimea which Crimean Tatars plan to impose on the 20th of September.

“Trading with Crimea is a matter of honour for us now, there can be no business. **Let us stop trading on blood. We’re going to stand to the death... This is a Crimean Maidan**”, he said.

At the meeting of the coordination council, a decision was made to allocate a place for the event where tents will be set up, electricity supplied, a sanitary zone provided around, garbage collection arranged for, water delivered, and rescue, ambulance, police, SBU and military operations enabled.

The Kherson police reported earlier that they will install tents and toilets for those activists who will block the entry of trucks into the annexed Crimea.

Crimean Tatars plan to start blocking the movement of trucks carrying goods to Crimea at noon on the 20th of September.

Crimean head Sergey Aksyonov said the peninsula is fully prepared for the blockade of food supplies from Mainland Ukraine.

Exhibit K

*Crimea Inform, Ukraine Will Repay Islyamov's Private TV Channel Multimillion-Dollar Debts
from the State Budget (23 April 2016)*

(translation)

Translation

Crimea Inform, *Ukraine Will Repay Islyamov's Private TV Channel Multimillion-Dollar-Debts from the State Budget* (23 April 2016), available at: <https://www.c-inform.info/news/id/37932>.

Ukraine Will Repay Islyamov's Private TV Channel Multimillion-dollar-Debts from the State Budget

Simferopol, 23 April, *Kryminform*. The Ukrainian Cabinet of Ministers passed a resolution to allocate financial aid to the private TV channel *ATR* owed by Lenur Islyamov, who has arranged for numerous “blockades” of Crimea, the press service of the Ukrainian Ministry of Information Policy reported.

“According to the resolution, the financial aid will be allocated to pay for satellite communication services, including the related charges in arrears since February 2014, TV equipment and premises leased and purchased, and copyrighted properties purchased and used”, the press service said in its statement.

As became known earlier, Mr. Islyamov’s *ATR TV* found itself under the threat of winding up due to UAH 10 mln (about RUB 25 mln) in a debt owed to Sweden-based SES ASTRA AB (for the use of an Astra A4 satellite). On the 1st of March, the Ukrainian Ministry of Information Policy suggested that the debt should be paid out of the funds of the Ukrainian state budget earmarked for support of the Crimean Tatars. On the 10th of March, Arseniy Yatsenyuk, the then Prime Minister of Ukraine, ordered that UAH 5 mln (RUB 15 mln) be allocated to repay *ATR TV*’s debt owed to the Swedish company. *ATR TV*’s owner himself donated a chevron worth UAH 1 (RUB 2.5) of the Crimean Tatar battalion he is establishing to save his media business.

Exhibit L

TASS, *Crimean Authorities Commented on the Termination of Broadcasting of ATR TV Channel in Ukraine* (11 February 2020)

(translation)

Translation

TASS, Crimean Authorities Commented on the Termination of Broadcasting of ATR TV Channel in Ukraine (11 February 2020), available at: <https://tass.ru/obschestvo/7732411>.

Crimean Authorities Commented on the Termination of Broadcasting of ATR TV Channel in Ukraine

By TASS

Simferopol, 11 February, *TASS*. The employees of the Crimean Tatar TV channel *ATR*, which has stopped broadcasting due to the lack of funding from the Ukrainian state budget, should be invited to work in Crimea, Albert Kangiyev, Chairman of the Republican State Committee for Interethnic Relations, told *TASS*.

On Monday, the channel began showing an empty studio with the background slogan “Save ATR”. *ATR*’s Deputy General Director Ayder Muzhdabayev said on his YouTube channel that *ATR* had stopped broadcasting due to the lack of funding from the Ukrainian state budget, which has provided UAH 50 mln (\$2 mln) for such funding.

“Of course, I feel sorry for those people who went to work there. Some of them are patriotic about their native land. Probably, we should invite them to work in our Crimean media. Labour force is always needed”, Mr. Kangiyev said.

He also clarified that the dismissed *ATR* employees could find a job on the Crimean TV channel *Millet* (“People”) or the Crimean radio station *Vatan Sedasy* (“Voice of the Motherland”).

In 2016, the Verkhovna Rada of Ukraine permitted state budget funds to be used to support *ATR*. The channel has stopped analogue broadcasting in Crimea since the 1st of April 2015 as it had not been issued a Russian licence. *ATR* has been broadcasting from Kyiv since the 17th of June 2015.

Millet Public Crimean Tatar TV and Radio Company were established as an autonomous non-profit organisation on the 22nd of April 2015 by a decree of Crimean head Sergey Aksyonov. The TV channel began broadcasting in the test mode in September 2015. It is designed to develop the culture and language of the Crimean Tatars and interethnic relations. It broadcasts 24 hours a day in Crimean Tatar (70%) and Russian (30%). The Crimean Tatar radio *Vatan Sedasy* (“Voice of the Motherland”) started broadcasting 24 hours a day in Crimea on the 6th of February 2017.

Exhibit M

RIA Novosti, *Who and When Will Build a New Dormitory for KFU Students in Simferopol*
(5 December 2022)

(translation)

Translation

RIA Novosti, *Who and When Will Build a New Dormitory for KFU Students in Simferopol* (5 December 2022), available at: <https://crimea.ria.ru/20221205/kto-i-kogda-postroit-novoe-obschezhitie-dlya-studentov-kfu-v-simferopole-1125687137.html>.

Who and When Will Build a New Dormitory for KFU Students in Simferopol?

Tekhstroy LLC will build a new hostel for 250 students of the Crimean Federal University.

5 December 2022 at 12:53 PM



© *RIA Novosti (Crimea)*. Alexander Druzhinovich

Simferopol, 5 December, *RIA Novosti (Crimea)*. A contractor has been chosen to build a new hostel for 250 students of the Vladimir Vernadsky Crimean Federal University (CFU) in Simferopol, the press service of the Single Construction Customer (SCS), an entity that controls the implementation of the construction project in Russia, reports.

According to the press service, a state contract for developing as-built documentation and building the hostel having a total area of over 5,000 square meters was awarded to Tekhstroy LLC.

“The new hostel will accommodate residential, educational, utility and administrative premises. A sports ground and an open guest parking area will be provided in its territory”, the company said.

The façades of the building will be finished in grey-blue and light grey colours with orange decorative elements, and its underground floor will house a buffet and utility premises. The project is expected to be completed in 2024.

RIA Novosti (Crimea)'s website says a permit to build the ten-storey hostel building containing residential, educational, utility and administrative premises was obtained in February 2022.

The SCS' press service also recalled that a state contract had been earlier awarded for building a second hostel for 450 CFU students.

Exhibit N

KFU, New Multimedia Technology Presented at KFU (28 January 2016)

(translation)

Translation

KFU, *New Multimedia Technology Presented at KFU (28 January 2016)*, available at: <https://cfuv.ru/news/v-kfu-prezentovali-novuyu-multimedijjnuyu-tekhniku>.



VLADIMIR VERNADSKY CRIMEAN FEDERAL UNIVERSITY

New Multimedia Technology Presented at KFU

28 January 2016

By CFU Media Centre



DNK Corporation presented the management, teachers and students of the Vladimir Vernadsky Crimean Federal University (CFU) with new multimedia equipment, which is becoming increasingly needed for the educational process these days.

The presentation took place at the Faculty of Slavic Philology and Journalism of the CFU's Taurida Academy. It was attended by Elena Chuyan, CFU's First Prorector, Vladimir Polishchuk, CFU's Prorector for Innovation and Prospective Development, and Vladimir Kurianov, CFU's Prorector for Academic and Methodological Activities.

Vladimir Polishchuk noted that the ability to use new state-of-the-art equipment is a key factor in training qualified personnel today.

“It is no secret that the introduction of the latest technology will qualitatively improve the educational process and increase the focus of attention and the perception of materials taught by students. I hope this meeting will become a starting point for our further joint projects”, he said.

Vladimir Kurianov added that the use of advanced multimedia technology will help to create a uniform environment, which will perform educational functions for social and humanitarian disciplines as well as for natural science, engineering, medical and other specialties. That is especially important for the Crimean Federal University, given the fact that its branches are located throughout Crimea.

Annex 34

[REDACTED], Informational Note

(translation)

Informational note

1. The Eshref Shemyi-Zade Secondary General Education School No. 42 (hereinafter referred to as the “School”) is located at the address 33 Selsky lane, Simferopol, Crimean Republic.
2. There are approximately 2,000 children of various nationalities (Russian, Crimean Tatar, Armenians and representatives of other nationalities). The main priority of school’s educational work is promoting respect and tolerance to each other regardless of ethnic origin.
3. School creates all necessary conditions for studying Crimean Tatar culture and language in accordance with the Federal law as of 19 December 2012 No.273-FZ “On education in Russian Federation”, legislative acts of Crimean republic, letters and ordinances of Ministry of education, science and youth of Crimean Republic, Education Directorate of administration of Simferopol, the Charter of the School.
4. All pupils at the school are familiar with Crimean Tatar culture and respect the national traditions. It is named after the famous Crimean Tatar poet Eshref Shemyi-Zade.
5. The School is located in a place with a high concentration of Crimean Tatars and a particular attention to language learning is paid at the School. The Crimean Tatar language is included in the curriculum of all classes, and our teachers participate in thematic workshops where they share methods of teaching the language. Besides, on a yearly basis upon application of parents (under art. 14 of the Federal law as of 19 December 2012 No.273-FZ “On Education in Russian Federation”) classes are created with education on Crimean Tatar language, among other classes and all spheres of school social life certain elements of Crimean Tatar language are integrated.
6. In order to successfully master Crimean Tatar language one should not rely only on school education, but also practice in live communication within the family which is a priority in language study.
7. There is an ethnographic corner museum within the walls of the school of Crimean Tatar decorative and applied arts, household items, national costume, embroidery, coinage etc., schools’ library is being regularly supplemented. The school anthem, written by our

students (music and words) is also performed in Crimean Tatar. The signs in the corridors and on the doors of the classrooms, the informational boards are bilingual.

8. As a result of the education of native language – participation and victories in regional and municipal stages of Federal competition of students (discipline Crimean Tatar language and literature).
9. A dance ensemble “Yildizlar” (Starlets) functions in our school as an out of curriculum activity. Classes are led by Honoured Artist of Crimea Maye Dilyaverovna Anafieva.
10. The result of the constructive work of our teachers, parents and children aimed at performing the educational standards is a high presentage of our students being admitted to the universities. Some students go to Crimean universities in faculties directly related to the study of the Crimean Tatar language (e.g., Crimean Tatar Philology Faculty) and then come back to us as young teachers.
11. Existence of such schools is important as it prevents linguistic or cultural discrimination and supports the development of Crimean Tatar language, history, and culture of Crimean Tatar people.



Annex 35

Ministry of Internal Affairs, Information on the number of missing persons in the Republic of Crimea and the City of Sevastopol between 2014 and 2022, No. 3466/dp, 22 February 2023

(translation)

Translation

Ministry of Internal Affairs, Information on the number of missing persons in the Republic of Crimea and the City of Sevastopol between 2014 and 2022, No. 3466/dp, 22 February 2023.

**MINISTRY OF INTERNAL
AFFAIRS OF THE RUSSIAN
FEDERATION**
16 Zhitnaya Street, Moscow, 119991

To the Deputy Minister of Foreign
Affairs of the Russian Federation,
M. Yu. Galuzin

1 March 2023 No. 1/2165
In reply to No. 3466/dp dated 22 February 2023

[Stamp]:MFA of Russia 172
Legal Department
Entry No. 4017
3 March 2023

[Stamp]: MFA of Russia 172
General Secretary
No. 8901
1 March 2023
19 55

Re sharing of information

Dear Mikhail Yuryevich,

The Ministry of Internal Affairs of the Russian Federation is hereby forwarding information within the scope of our competence concerning the results of our considering the request of the Ministry of Foreign Affairs of Russia regarding the defence of our country's interests in "Ukraine v. Russian Federation".

Annex: as per text, 2 pages, 1 copy.

Respectfully,
Deputy Minister

A. I. Khrapov

**THE DOCUMENT IS SIGNED WITH ELECTRONIC
SIGNATURE**

Certificate <...>
Owner <...>
Valid from 14 October 2022 till 7 January 2024

Prepared by <...>
<...>

Information
on the number of missing persons in the Republic of Crimea and Sevastopol
between 2014 and 2022

Between 2014 and 2022, 1,353 cases were opened to search for missing persons (*1,039 Russians, 228 Ukrainians and 86 Crimean Tatars*), 1,095 were discontinued (*878 Russians, 148 Ukrainians and 69 Crimean Tatars*) and the location of 258 such persons is being established (*161 Russians, 80 Ukrainians and 17 Crimean Tatars*) in the Republic of Crimea and Sevastopol¹.

Of the total number of such persons, 188 missing person search cases were opened in relation to persons whose disappearance led to a criminal investigation (*148 Russians, 23 Ukrainians and 17 Crimean Tatars*); 55 cases were discontinued (*42 Russians, 10 Ukrainians and 3 Crimean Tatars*); and the location of 133 such persons (*106 Russians, 13 Ukrainians and 14 Crimean Tatars*) is being established.

Ministry of Internal Affairs of Russia

¹ According to the Ministry of Internal Affairs of the Republic of Crimea and the Sevastopol Department of the Ministry of Internal Affairs of Russia.

Information

on criminal prosecutions for extremist crimes and the number of missing persons in the Russian Federation between 2014 and 2022

Between 2014 and 2022, 7,679 persons were prosecuted for extremist crimes in the Russian Federation.¹

A total of 588,265 (*taking into account the previous years balance*) missing persons were searched for; of these 243,315 were reported missing during the period in question. A total of 131,246 criminal proceedings were instituted in connection with the disappearance of people.

The search for 266,563 such persons was discontinued; of these 230,313 persons were located.

As of 1 January 2023, there were 321,752 missing persons; of these 124,744 are searched for as part of criminal investigations.

Moreover, please note that the search for missing persons is conducted in accordance with the requirements of the Constitution of the Russian Federation, Federal Law No. 3 "On the Police" dated 7 February 2011 and Federal Law No. 144 "On the Conduct of Investigations" dated 12 August 1995, as well as departmental and interdepartmental regulations. When applications concerning such incidents are considered, the nationality of the persons concerned or their racial or ethnic background do not affect the objectivity in the consideration of the applications or of decisions in their respect or the comprehensiveness of investigations conducted.

Ministry of Internal Affairs of Russia

¹ According to the Federal State Institution "Main Information and Analysis Centre of the Ministry of Internal Affairs of the Russian Federation".

Annex 36

Uspishna Varta, THE RIGHT TO FREEDOM OF SPEECH AND OPINION IN UKRAINE: THREATS AND OPPORTUNITIES, 2018



USPISHNA VARTA
HUMAN RIGHTS PLATFORM

**THE RIGHT TO FREEDOM OF
SPEECH AND OPINION
IN UKRAINE:
THREATS AND OPPORTUNITIES**

This report was prepared by the **Ukrainian human rights platform «Uspishna Varta»**. This report assesses the observance of rights and freedoms *on the territory controlled by the government of Ukraine*. This report is based on data obtained by the human rights platform «Uspishna Varta» via conducting detailed interviews with victims and witnesses of human rights violations and infringements, experts and human rights defenders, as well as via carrying out activities to assist in the protection of human rights in documented cases. Among them - the monitoring of trials, advocacy work with the duty bearers on respecting human rights, non-governmental organizations, and the media.

© 2018 Human rights platform «Uspishna Varta»

All Rights Reserved.

More information about «Uspishna Varta» can be found at the website uspishna-varta.com

e-mail: uspishnavarta@gmail.com

Tel.: 0 800 20 40 04

CONTENTS



GENERAL SITUATION WITH RESPECT TO POLITICAL RIGHTS AND FREEDOMS IN UKRAINE.....	4	RESTRICTIONS ON FREEDOM OF SPEECH BY LAW ENFORCEMENT AND SECURITY.....	18
THREATS TO FREEDOM OF SPEECH AND OPINION IN UKRAINE AT THE LEVEL OF STATE POLICY.....	6	Interference of the Security Service of Ukraine in the work of journalists	
Establishment of language quotas for radio and television		Arrests of Ukrainian journalists and bloggers under “separatist” articles	
Restriction on the freedom of information and cultural exchange with Russia		Detention of Internet users for posts on social networks	
Censorship at the level of government and state authorities		Deportation and non-admission of foreign journalists	
Systematic pressure on independent media companies		STATUS OF SOCIETAL RESPECT FOR THE RIGHT TO FREEDOM OF OPINION AND EXPRESSION.....	27
RESTRICTIONS ON FREEDOM OF EXPRESSION AND INFORMATION EXCHANGE ON THE INTERNETE.....	16	Physical violence against journalists in connection with their professional activity	
Blocking social networks and websites		Hate speech and the website “Mirotvorets”	
Law No. 6688 on the extrajudicial blocking of Internet resources		GENERAL RECOMMENDATIONS FOR COMPLIANCE WITH THE RIGHT TO FREEDOM OF SPEECH AND OPINION.....	32



GENERAL SITUATION WITH RESPECT TO POLITICAL RIGHTS AND FREEDOMS IN UKRAINE

According to the results of monitoring in April-August 2018, the human rights platform «Uspishna Varta» recorded **99** violations of political rights and freedoms. From these, **62 cases (63%)** were related to the **violation of the right to freedom of speech and opinion**.

POLITICAL RIGHTS AND FREEDOMS IN UKRAINE

(April-August 2018)



99 violations of political rights and freedoms

More than a quarter of the recorded cases of violations of rights and freedoms were committed by right-wing radical groups (27 cases)

28%



63%

62 recorded cases of violations of the right to freedom of speech and opinion



17%

16 recorded cases of violations of the right to peaceful assembly



12%

12 recorded cases of violation of the right to freedom of association



8%

8 cases of violations of the right to freedom of conscience and religion

GENERAL SITUATION WITH RESPECT TO POLITICAL RIGHTS AND FREEDOMS IN UKRAINE



PERSONS RESPONSIBLE FOR THE VIOLATION OR RIGHTS

(April-August 2018)

28% of all recorded violations of political rights and freedoms involved **right-wing radical organizations**, primarily C14, "National Druzhina", "Bratstvo", "Right Sector", etc. In general, the collective actions of **law enforcement agencies** (SBU, the Prosecutor General's office, the State Border Service, and the National Police) led to the violation of political rights and freedoms in **26%** of recorded cases.

28%
right-wing radical organizations

26%
law enforcement agencies

25%
unidentified persons

11%
private companies / individuals

6%
public authorities

4%
representatives of local authorities

PERSONS WHOSE RIGHTS WERE VIOLATED

(April-August 2018)

41% of the recorded cases (40) violated the rights of **journalists** – both Ukrainian and foreign; in addition, the rights of some **media companies** were also violated (15 cases, 16%). Among the categories of persons whose rights are violated it is also necessary to mention **political parties** and/or **individual politicians** (mainly the left-wing ideological agenda), as well as **public activists** (13% and 10% of the recorded facts, respectively).

41%
journalists

16%
media companies

13%
political party

10%
public organizations and activists

9%
religious community (Ukrainian Orthodox Church)

3%
LGBT community

3%
social media users

3%
human rights defenders

2%
cultural institutions and figures



THE RIGHT TO FREEDOM OF SPEECH AND OPINION IS GUARANTEED UNDER:

article 10 of the *European Convention for the Protection of Human Rights and Fundamental Freedoms*,
article 19 of the *International Covenant on Civil and Political Rights*,
article 34 of the *Constitution of Ukraine*.

During 2014-2018, a number of changes were made to the legislation that regulates the law in question. Some of them significantly restrict the freedom of information exchange and introduce language quotas for television and radio, and also create conditions for disproportionate sanctions against independent media companies. In general, the government introduced measures that prohibited or blocked information, the media or individual journalists who were considered a threat to national security or who expressed views that undermined the sovereignty and territorial integrity of the country.

“

The Council of Europe in expert opinion on the distribution of institutional powers in the field of information policy and media in Ukraine pointed out: the provision of Article 9 of the law “On television and radio”, according to which at least 50% of the broadcasting of television and radio companies must be a national audiovisual product (or Ukrainian music in the case of radio), is contrary to EU law.

”

“

The PACE resolution “Protection and Promotion of Regional or Minority Languages in Europe” from January 23, 2018 expressed concern that “some projects are aimed at reducing the current rights of national minorities”. PACE recommended that Ukraine “refrain from applying restrictive legal and policy measures, such as subtitling/broadcasting obligations and mandatory quotas for programs in the official language”.

”

THREATS TO FREEDOM OF SPEECH AND OPINION IN UKRAINE
AT THE LEVEL OF STATE POLICY



ESTABLISHMENT OF LANGUAGE QUOTAS FOR RADIO AND TELEVISION

Law No. 3822-d «On amendments to the Law of Ukraine «On television and radio broadcasting» (concerning the proportion of songs in the state language in music radio programs and radio broadcasts)» dated 16 June 2016.

This law established that from November 8, 2016, radio stations are obliged to broadcast at least 25% of songs in Ukrainian and broadcast at least 50% of programs in Ukrainian during the day; from November 8, 2017, the proportion increased for songs to 30% and 55%, respectively; from November 8, 2018 - to 35% and 60%. For those radio stations that, according to their license, broadcast more than 60% of songs in the languages of the EU, a preferential quota of 25% for songs in the Ukrainian language was established. For failure to comply with these requirements, radio organizations must pay a fine of 5% of their license fee.

Law No. 5313 «On amendments to some laws of Ukraine concerning the language of audiovisual (electronic) mass media» from 23 May 2017.

This law stipulates the introduction of similar language quotas for television: 75% of national and regional TV channel should be in the state languages, 60% - local TV channels, and 75% - for TV programs. If broadcasters fail to implement these language quotas, a fine of 5% of their total license fee is provided. Mandatory quotas for European and Ukrainian products also apply to satellite TV channels. The norms of the law will work in full only from the second year of its action - from October 13, 2018.

Law No. 2766 «On amendments to the law of Ukraine «On television and radio broadcasting» (concerning the definition of European broadcasts)» from May 17, 2016.

This law stipulates the exclusion of Russian audiovisual products from the quota for European television and radio products (except for satellite broadcasting). The new provisions entered into force on September 15, 2016.



RESTRICTION ON THE FREEDOM OF INFORMATION AND CULTURAL EXCHANGE WITH RUSSIA

On February 5, 2015 the Verkhovna Rada legislatively banned the broadcasting of **films produced in the Russian Federation** after January 1, 2014.

On March 29, 2016 the law was updated, the ban also extended to works produced and (or) first published (shown) after January 1, 2014.



Over the past three years the state has banned the showing of more than 500 movies in Ukraine.

Law No. 5114 "On amendments to some laws of Ukraine concerning the restriction of access of foreign printed materials featuring anti-Ukrainian content to the Ukrainian market" from December 8, 2016 introduced the licensing principle for the importation of **books from Russia** and the temporarily occupied territories of Ukraine. Distribution of Russian books without permission is punishable by fines.



During the period from January 1, 2017 to February 14, 2018, the State Committee banned 30 books published in the Russian Federation, in particular the book "Stalingrad" by the British historian Anthony Beevor translated into Russian.

Law No. 6682 "On amendments to the law of Ukraine 'On tour events in Ukraine' regarding the peculiarities of the organization and carrying out of tour events with the participation of citizens of the aggressor state" from October 5, 2017 introduced a pre-tour inspection of **Russian performing artists** by the Security Service of Ukraine.



As of May 25, 2018, this list includes the names of 131 Russian figures of culture and art. As of January 2018, the State Border Service of Ukraine banned 104 Russian artists from entry to Ukraine for 3 years.

In 2014 the National Council of Television and Radio Broadcasting issued a statement in which it demanded that the providers of cable television cease to broadcast **Russian TV channels**, including RBK-TV, "Pervy Kanal", "Planeta RTR", "Rossiya 24", "NTV-Mir", "Teletsentr Internatsional", "Rossiya 1", "NTV", "TNT", "Peterburg 5", "Zvezda", "Ren TV", and "LifeNews". On January 12, 2017, the National Council also banned the broadcasting of the Russian opposition TV channel "Dozhd".

THREATS TO FREEDOM OF SPEECH AND OPINION IN UKRAINE
AT THE LEVEL OF STATE POLICY

CENSORSHIP AT THE LEVEL OF GOVERNMENT AND STATE AUTHORITIES

On January 14, 2015 the Ministry of Information Policy (MIP) was established in Ukraine, which was determined by the main body in the system of Central Executive authorities in the field of the information sovereignty of Ukraine. In 2015, the Minister Yury Stets announced his intention to create a coordination center for bloggers who distribute theses from the authorities on social networks, received the informal name "porobots" (due to the complimentary nature of their reports on the activities of President Poroshenko).



OSCE representative on freedom of the media Dunja Mijatovic: "The initiative to create a Ministry of Information is a direct threat to freedom of speech and is not the way to counter-propaganda".



The report of Human Rights Watch for 2015: the creation in December 2014 of the MIP coincided with the emergence of independent reports of violations by pro-government forces in the East of the country. Ukrainian bloggers and journalists criticised the creation of the new Ministry, fearing that it could lead to censorship.



In 2017, the National Council imposed a "fine" on 17 radio stations. The total amount of fines amounted to more than 1 million hryvnia. In March 2018, the National Council imposed a record fine of 327,800 hryvnia (about 10,000 euros) on the radio station "Pyatnitsa" for the fact that in the period from 07:00 AM to 14:00 PM the proportion of songs performed in the state language was 29% instead of the statutory 30%.

The media sphere is managed by the **National Council of Television and Radio Broadcasting of Ukraine** (hereinafter – National Council) – a permanent collegial body, whose purpose is to monitor compliance with the laws of Ukraine in the field of broadcasting.

Based on the National Council's practice of depriving TV channels and radio stations of their licenses in 2014-2018, this measure is used by the leadership of the regulator to put pressure on media that refuse to change their editorial policy in order to comply with President Poroshenko. Thus, the TV channels "Inter", "1+1", "112, NewsOne, and Zik stated that they were being pressured via the threat of their licenses being revoked.



At the meetings concerning the deprivation of licenses, members of the National Council openly talk about the political expediency of their decisions allegedly with the aim of "combating separatism" and "countering Russian aggression".



On February 3, 2017, the National Council decided not to renew the broadcasting license of "Radio Vesti" in Kharkov, and on March 3 - in Kiev. According to the representative of the National Council Ulyana Feschuk, the radio station had 4 active warnings, one of which was imposed because of the direct speech on the air of LPR and DPR militants. Another warning was received by the company for failing to provide on-air recordings, as a result of which it allegedly obstructed the legitimate activities of the National Council. In addition, a warning was issued for the presence on the air of the lawyer Tatyana Montyan, whose speech "insulted honor and dignity, and she was not stopped by the journalist". During the meeting of the National Council on March 3, repre-

sentatives of the "patriotic community" in the face of members of right-wing radical groups were present in the room. Contrary to the court ruling, which imposed a ban on revoking the licence of "Radio Vesti", members of the National Council made their decision because "separatist radio cannot broadcast in Kiev while Ukrainian soldiers are fighting in Donbass".

At the same time, in July 2017, without delay, the National Council reissued seven licenses of LLC "TK TONIS", including for multi-channel and satellite broadcasting, in connection with the change of ownership and the concept of broadcasting. Now it is the "Pryamoy" channel, which, according to independent media experts, is indirectly controlled by President Poroshenko.

In February 2018, more than 60 representatives of the media and media companies appealed to President Poroshenko and other authorities to stop censorship in the country and the blackmailing of editors by the National Council, which they consider as the beginning of curtailing freedom of speech in Ukraine. "The actual duties of this body were reduced to censorship, constant unscheduled inspections, blackmailing agencies concerning the renewal of licenses etc," it is said in the appeal. From the major media, it was signed by journalists from "Strana", "Era-Media", "Inter", "Vesti", ZIK, NewsOne, "112 Ukraine", "Era-FM", UA|TV, and other media.

 THREATS TO FREEDOM OF SPEECH AND OPINION IN UKRAINE
 AT THE LEVEL OF STATE POLICY


SYSTEMATIC PRESSURE ON INDEPENDENT MEDIA COMPANIES

Independent media companies broadcasting an alternative point of view on the situation in Ukraine are mainly put under pressure by the Ukrainian authorities. The audience of these channels is mainly the Russian-speaking population, which did not support the politicians who came to power after the events of Maidan in 2014.

The facts recorded during 2014-2018 allow to say that a set of measures is used by the authorities to put pressure on independent media:



Searches and the opening of criminal cases against media agencies and their owners by law enforcement agencies;



Penalties and the threat of revoking licenses by the National Council on Television and Radio Broadcasting;



Creating an atmosphere of intolerance around these media and their journalists and using hate speech against them by representatives of state bodies and leaders of opinions loyal to them;



Attacks and threats against journalists and the offices of media agencies by right-wing nationalist groups; the inaction of law enforcement agencies in investigating such attacks;



Delaying the consideration of media companies' claims in court or ignoring court decisions made in their favor.



THREATS TO FREEDOM OF SPEECH AND OPINION IN UKRAINE AT THE LEVEL OF STATE POLICY

THE "INTER" (INTER MEDIA GROUP) TV CHANNEL

The "Inter" TV channel is part of the largest Ukrainian media group "Inter Media Group", which is the leader in terms of TV viewership.

In the **summer of 2014**, the channel announced technological attacks in various regions, where unknown persons jammed the TV signal at the time of broadcasting news programs and political talk shows.

In **January 2015**, the Secretary of the National Security Council Aleksandr Turchynov demanded to deprive the "Inter" TV channel of its license because it broadcasted on New Year's Eve a concert with the participation of Russian artists, who "openly support the position of Russia in the Ukrainian crisis".



On **May 25, 2015** the official website of the Ministry of Internal Affairs of Ukraine published a message about the beginning of an investigation into two facts of offenses committed almost 20 years ago, allegedly related to the illegal actions of some "unidentified persons" associated with the "Inter" TV channel.

On **25 February, 2016** militants from the "Azov" group blocked the building of "Inter" in Kiev, demanding to review the editorial policy of the channel and "abandon the Kremlin propaganda".

On **September 4, 2016** another attack on the TV channel's office and an attempt to set fire to the building was carried out. Several employees were hospitalized with carbon monoxide poisoning, and one received a spinal injury.

On **9 May, 2018** representatives of the paramilitaristic far-right organization "National Corps" ("Azov") once again laid siege to the office of the Ukrainian TV channel "Inter". They demanded to remove from the airwaves the festive concert "Victory. One for all", which the channel planned to show on Victory Day.

On **July 11, 2018** the National Council fined the channel for the amount of 4 million hryvnia. (about \$150,000) for the expressions made by the host of the channel containing a condemnation of Nazism as a manifestation of fascism.

On **July 27, 2018** information was received about the mining of the "Inter" TV channel, which had previously announced the broadcast of the prayer from Vladimir Hill and the procession in the capital. However, after verification, the information was not confirmed and "Inter" was able to broadcast the event.

12

THE RIGHT TO FREEDOM OF SPEECH AND OPINION IN UKRAINE: THREATS AND OPPORTUNITIES

HUMAN RIGHTS PLATFORM **USPISHNA VARTA**

THREATS TO FREEDOM OF SPEECH AND OPINION IN UKRAINE AT THE LEVEL OF STATE POLICY



THE "NEWSONE" TV CHANNEL

On **June 14, 2017** the channel announced the beginning of an information campaign against it in the media and on social networks, the purpose of which being to close it.

On **December 3, 2017** activists from a far-right group (Korchinsky's "Bratstvo") blocked the business center in Kiev, where the TV channel operates.

On **20 April 2018** it became known that the provider "Express-inform" had stopped the digital broadcasting format of the NewsOne TV channel in Kiev and the Kiev region.

On **June 8, 2018** the Prosecutor General's Office opened criminal proceedings against the official owner of the NewsOne TV channel and opposition politician Evgeny Murayev under part 1 of article 111 (state treason), part 2 of article 383 (knowingly false information) of the Criminal Code of Ukraine.



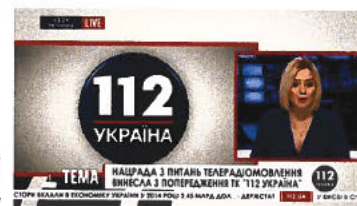
THE "112 UKRAINE" TV CHANNEL

The repeated application of pressure was also reported by the news information TV channel "112 Ukraine".

In **August, 2014** the channel applied to the National Council of TV and Radio Broadcasting for the purpose of making changes to its satellite and digital licenses due to an increase in information content and programs of its own production. But soon after the National Council issued 6 warnings to the channel for non-compliance with the program concept.

In the **winter of 2015** "112 Ukraine" received a warning after it broadcasted the popular talk show "Shuster LIVE". In March 2015, the National Council issued another 5 warnings for license violations. In June 2015, members of the National Council once again refused to renew the license of the "112 Ukraine" TV channel.

In **May 2018**, the head of the National Council Yury Artemenko in an interview with "Channel 5" said that in July 2018 the National Council does not intend to extend the license of the "112 Ukraine" TV channel, as it allegedly negatively affects public opinion. The channel regarded the threats of officials as obstruction of journalistic activities and in an open letter demanded the dismissal of the head of the National Council.




MEDIA HOLDING "VESTI UKRAINE"

Since 2014, the National Council, representatives of law enforcement bodies, and far-right groups have been systematically putting pressure on the media holding "Vesti Ukraine" (radio "Vesti", the newspaper "Vesti", the vesti-ukr and ubr.ua websites, the TV channel UBR).

Three days before the presidential election - **May 22, 2014** - the accounts of one of the holding companies were blocked, and the office of the newspaper "Vesti" was searched by the tax police and the Interior Ministry.

On **July 5, 2014** the newspaper was attacked by about 50 militants. They broke the facade of the editorial board with stones and molotov cocktails and sprayed tear gas.



In **July, 2014** the National Council issued a warning to the Radio Vesti holding for broadcasting on the air the live speech of representatives of the DPR, although similar materials were broadcasted on the air of many TV channels and radio stations.

In **September 2014**, after the start of the parliamentary electoral campaign, the newspaper "Vesti" was searched by the SBU with the seizure of all computers, accounting and business documents, servers, and office equipment.

In **June 2015**, employees of the tax police conducted another search at the office of the media holding and editorial offices. In February 2017, the National Council imposed a fine on the radio station for the amount of 39,600 hryvnia according to the results of unscheduled inspections in regards to 0.78% of total broadcasts not being in the Ukrainian language (i.e., 49.22% was in Ukrainian, instead of the required 50%).

A few days later, the National Council refused to extend the license of Radio Vesti in Kharkov and in Kiev.

On **July 14, 2017** employees of the Main Military Prosecutor's Office, with the assistance of the National Police, conducted a search at the editorial office of the media holding under the supervision of the Military Prosecutor Anatoly Matios, whose activities had been previously investigated by the journalists of "Vesti". Military armored vehicles surrounded the building of the "Gulliver" business center in the center of the capital of Ukraine, where the office of the "Media Holding Vesti Ukraine". The territory was cordoned off by law enforcement officers.

 THREATS TO FREEDOM OF SPEECH AND OPINION IN UKRAINE
 AT THE LEVEL OF STATE POLICY


Despite the protests and concerns of international organizations, on **February 8, 2018** there was a forceful seizure of the office of the "Vesti" Media Holding with the active participation of government agencies, law enforcement bodies, and civilian mercenaries. As a result: the prevention of journalists to lawfully occupy the office, the seizure of tools, equipment, and personal belongings, the destruction of editorial office, the spraying of unknown gas at journalists, and the obstruction of journalistic activity.

On **August 29, 2018** the National Council decided to check the radio station "Radio Vesti" in an unscheduled manner in connection with the discovery of signs of violation of the law on language quotas.

THE INTERNET WEBSITE "STRANA.UA"

On **June 22, 2017** the editor-in-chief of the website "Strana.ua" Igor Guzhva was detained on suspicion of extortion. Guzhva denied all charges and stated that he was being pressured in connection with his journalistic activities and the editorial policy of his publication. On 24 June, 2017 the court elected a measure of restraint for Guzhva in the form of around-the-clock house arrest with the alternative of making a pledge for the amount of 544,000 hryvnia. On June 26 Guzhva paid the pledge, and on June 27 he was released from prison.

On **9 August 2017** the "Strana.ua" publication and the homes of its journalists were searched. The Security Service of Ukraine stated that law enforcement officers checked the computers in the office for the presence of materials containing state secrets.

On **February 1, 2018** Igor Guzhva said that he had asked for political asylum in Austria. At the same time Guzhva continues to manage the site, despite being in another country.





THE BLOCKING OF SOCIAL NETWORKS AND INTERNET SITES

On May 16, 2017 President Poroshenko signed a decree on new sanctions against Russia, which included, in particular, **blocking access to the popular social networks “VKontakte” and “Odnoklassniki”**. These social networks were especially popular among the Russian-speaking residents of South-Eastern Ukraine, most of who (according to social studies) adhered to Poroshenko's alternative views. Also, the President's decree banned Yandex search engine services, mail.ru, Kinopoisk, and the Kaspersky and Dr.Web antivirus tools.



The total monthly audience of the social networks “VKontakte” and “Odnoklassniki” in Ukraine was **25.3 million people**.



Ukraine researcher at Human Rights Watch Tanya Cooper: “With this step, Petro Poroshenko struck a terrible blow to freedom of speech in Ukraine. This is an inexcusable violation of the right of Ukrainians to receive information of their choice, and the EU and other international partners of Ukraine should immediately call on Ukraine to cancel it”.



The next restrictions on freedom of speech and opinion were imposed by the decree of the President of **Petro Poroshenko** on May 14, 2018, which introduced the **updated sanctions** of the National Security and Defense Council on May 2, against 1948 individuals and 756 legal persons. Among them - a **number of Russian media agencies**, as well as the Ukrainian media companies “Media innovation group” (the “*Ekonomicheskye izvestiya*” agency) and “Ukrainsky biznes portal” LLC.

In June, the providers of Ukraine received a letter from the SBU demanding to **block about 200 Internet websites**. The document published by journalists includes the sites of the “DPR” and “LPR”, the official websites of the Crimean authorities, many Russian news agencies, as well as all subdomains of the WebMoney payment service. The black list also includes the resources of the state media holding of the Russian Federation “Russia today”.

RESTRICTIONS ON FREEDOM OF EXPRESSION AND
INFORMATION EXCHANGE ON THE INTERNET

LAW NO. 6688 ON THE EXTRAJUDICIAL BLOCKING OF INTERNET RESOURCES

At the level of **legislative regulation**, the greatest concern of human rights defenders is **draft law No. 6688**, which provides the possibility of the **extrajudicial blocking of websites**. Among the proposed changes are those that threaten the free development of the Internet in Ukraine. Thus, people's deputies initiated the introduction of the principle of temporarily blocking websites for up to 2 days (on the initiative of the prosecutor or investigator) or indefinitely (by the court's decision). Consideration of the application will take place on the day of receipt and can be taken in the absence of the suspect or accused, or even to establish their identity.

According to the human rights activists of “Uspishna Varta”, the fact that the draft law has been submitted to the Parliament is a serious blow to freedom of speech and poses significant threats to the media and the free exchange of information on the Internet, the rights to which are enshrined in *Article 34 of the Constitution of Ukraine, Article 10 of the European Convention for the Protection of Human Rights and Fundamental Freedoms, and Articles 18 and 19 of the International Covenant on Civil and Political Rights*.

OSCE Representative on Freedom of the Media Harlem Desir has raised concerns regarding the draft law “On changes to some legislative acts of Ukraine on countering threats to national security in the information sphere,” as it may endanger free access to information online. “I call on the lawmakers to seriously reconsider the text of the draft law and balance security concerns with the citizens' right to free expression and free media,” the OSCE website quoted Desir as saying.



In its annual publication “Freedom on the Net”, published in November 2017, *Freedom House* came to the conclusion that Internet freedom in Ukraine has deteriorated for the second consecutive year. It noted, in particular, that “the authorities have become less tolerant of expressing opinions online that are perceived as being critical of Ukraine's position in the conflict. It is also noted that the government in 2017 was particularly actively involved in accusing social media users of “separatist” and “extremist” activity, with many users being detained, fined, and even jailed for such activity.”





INTERFERENCE OF THE SECURITY SERVICE OF UKRAINE IN THE WORK OF JOURNALISTS

Ukrainian and international human rights activists recorded **numerous instances of the SBU interfering in the work of journalists and the activity of public organizations** in order to censor materials and voiced opinions concerning the conflict in Donbass and relations with the Russian Federation.

According to the UN OHCHR (August 2016), members of the Ukrainian media covering sensitive topics (for example, military losses or the illegal activities of Ukrainian military personnel) continue to be put under pressure by the SBU and the Armed Forces of Ukraine (UAF). Some journalists also report self-censorship, which they resort to when they feel that the publication of certain information can be damaging for the UAF, or the fear that Russian or controlled by armed groups media can use such information for propaganda purposes. In February 2017, the UN OHCHR again noted that it has repeatedly taken record of testimonies of journalists about the SBU's interference in their professional activities, which is an attack on the freedom of the media and limits the objective coverage of the situation in Eastern Ukraine.

In an open address to President Poroshenko in February 2018, more than **60 representatives of Ukrainian media companies** demanded to stop censorship in the country and, in particular, to assess the activities of **special units of the SBU, which wiretap and survey journalists**.

"Babchenko's case" and censorship in the media. On May 29, 2018 law enforcement agencies reported about the murder of the **Russian journalist Arkady Babchenko living in Kiev**. On the

same day, a number of officials claimed that there was a "trace of the Kremlin" in the crime. On May 30, during a briefing the head of the SBU Vasily Gritsak and the Prosecutor General of Ukraine Yury Lutsenko reported the murder of the journalist Babchenko was a dramatisation, and that the journalist is alive. The SBU explained that there was a need to stage the dramatisation in order to identify the clients and perpetrators of the alleged contract killings of more than 30 (later – 47) Ukrainian journalists and public figures. However, the video presented by the SBU of the statements of the detained "client" Boris German raised doubts about the involvement of the Russian special services in this case, and in general about the appropriateness of this staging.

International organizations and diplomatic missions demanded to explain the need to stage the death of Arkady Babchenko, calling it an "extreme measure". In the opinion of human rights activists, **law enforcement officials used the situation with the "murder" of Babchenko to force other journalists to censor themselves**.

Thus, **the International and European Federation of Journalists (IFJ-EFJ)** condemned the so-called **list of "26 traitors"** who criticized the government in the situation with Babchenko. The list includes, in particular, the journalist Miroslav Gongadze and the Chairman of the National Union of Journalists of Ukraine Sergey Tomilenko. This list was published by a press secretary of the Prosecutor General's office of Ukraine Larisa Sargan on her page on Facebook. The OSCE representative on freedom of the media Harlem Desir called the publication of this list and the accusations of treason made against journalists "unacceptable and dangerous".

RESTRICTIONS ON FREEDOM OF SPEECH BY LAW ENFORCEMENT AND SECURITY



ARRESTS OF UKRAINIAN JOURNALISTS AND BLOGGERS UNDER "SEPARATIST" ARTICLES

Since 2015, the **practice of bringing journalists and bloggers to criminal responsibility under "separatist" Articles** has become excessively widely used by the SBU. Detainees as a rule have no alternative other than to stay in jail, and court hearings on their cases are deliberately delayed. Contrary to the appeals of international organizations to release these persons as prisoners of conscience, the leadership of the state refuses to recognize the presence of political prisoners in Ukraine.

In 2014-2015, the Parliament of Ukraine adopted a number of amendments to the "special part" of the Criminal Code and increased the terms of imprisonment under articles 110 - 114-1 and 279 up to life imprisonment. These are **so-called "separatist" articles**, which, according to the legislators, are to be used to protect the territorial integrity and sovereignty of the state.

For example, the speeches of citizens during peaceful assemblies directed against military mobilization (such meetings acquired a mass character in all regions of Ukraine in 2015) are qualified by law enforcement bodies as *"obstruction of the activity of the Armed Forces"* (Article 114-1 of the Criminal Code). In addition, calls for reconciliation in Donbass are qualified as "treason" (article 111 of the Criminal Code) and calls for a federal structure are qualified as *"an attack on territorial integrity"* (article 110 of the Criminal Code). Any criticism of the government, including statements about its unconstitutionality, or criticism of the socio-political system established after Maidan, can be qualified by law enforcement bodies as *"actions aimed at violent change or overthrow of the constitutional system"* (article 109).

Besides this, the SBU widely applied Article 258-3 of the Criminal Code of Ukraine *"Creation of a terrorist group or the organization"*, which provides criminal punishment for a number of actions, in particular, "participation" or "material, organizational, or other assistance to the creation or activity" of a terrorist group. This formulation allows for a broad interpretation of the law, contrary to the basic principle of legal certainty.

The UN OHCHR, in its monitoring mission report (November 2017), noted with respect to the cases of **Kotsaba, Vasilets-Timonin, and Muravitsky** that the provisions of anti-separatism legislation should be applied in accordance with the obligations of states under article 19, paragraph 1 of the International Covenant on Civil and Political Rights, and should not be used to stifle or criminalise opposition opinions or criticism.



RESTRICTIONS ON FREEDOM OF SPEECH BY LAW ENFORCEMENT AND SECURITY



Ruslan Kotsaba
journalist
from Ivano-Frankovsk

Was accused of high treason for publishing a video calling against military mobilization.

On **February 7, 2015**, SBU officers arrested Kotsaba. He was jailed for 524 days without an alternative option.

On **July 14, 2016**, the Court of Appeal fully acquitted and released the journalist. On March 30, 2017, the Prosecutor's office received an appeal and the Supreme Court returned the case to the Court of Appeal for reconsideration.

On **May 29, 2018**, the Lvov Court of Appeal decided to return the indictment in Kotsaba's case to the Prosecutor's office for revision due to being inadequate to the norms of the law of Ukraine. This is already the second case - after the Dolinsky court of the Ivano-Frankovsk region - where such a decision has been made. The lawyer Tatyana Montyan noted that currently there are 44 procedural documents in the register of court decisions in the case of Ruslan Kotsaba. Prosecutors can sent these cases to court. I.e., the final point on the case of Ruslan Kotsaba is not being applied 17.

On **August 10, 2018** the blogger reported that the updated case against him has already been registered in the Ivano-Frankovsk city court.



Dmitry Vasilets
opposition journalist and
public figure
Evgeny Timonin
IT-specialist

They were detained by the SBU on **November 24, 2015** and were groundlessly kept in jail for **820 days** (2 years 3 months.).

They are accused of **informationally aiding and abetting terrorism** under Article 258-3 of the Criminal Code for a 4-day trip to Donetsk in July 2014. According to the SBU, E. Timonin helped set up a YouTube channel and a number of other services for the non-existent at that time information resource "Novorossiya-TV", and D. Vasilets oversaw it, thus they provided information assistance to the terrorist organization "Novorossiya-TV".

On September 29, 2017 the Andrushevsky court of Zhytomyr, after almost two years of being in pre-trial detention and litigations, issued a guilty verdict and sentenced D. Vasilets and E. Timonin to **9 years in prison**.

In December 2017, 25 members of the European Parliament prepared a letter to the Ukrainian government calling for the immediate and unconditional release of Vasilets and Timonin.

On February 21, 2018, the Kiev **Court of Appeal overturned the 9-year sentence**, and sent the case for a new trial to the court of first instance and **changed the measure of restraint to house arrest**.

RESTRICTIONS ON FREEDOM OF SPEECH BY LAW ENFORCEMENT AND SECURITY



Vasily Muravitsky
Opposition journalist and
expert-analyst

He was detained by the SBU on **August 2, 2017** on charges of high treason upon the fact of concluding a standard employment contract

with an international Russian publication, where he published his analytical column. For these publications Muravitsky was accused of "psychologically manipulating public consciousness" and even fundraising in favor of the "DPR" and "LPR", and was called a "pro-Kremlin" journalist-blogger. Allegedly, on the instructions of "Russian curators" Muravitsky prepared and distributed anti-Ukrainian materials.

Amnesty International declared V. Muravitsky as a prisoner of conscience.

According to lawyers, the Prosecutor's office artificially delayed consideration of the case. On June 27, the Korolevsky court of Zhytomyr changed the measure of restraint, after 11 months in jail the journalist was transferred to house arrest.

On August 6 the Korolevsky court of Zhytomyr another hearing took place concerning the case of the journalist Vasily Muravitsky. The court denied the Prosecutor's claim and left the journalist under house arrest for another 2 months. Dissatisfied with the court's decision, representatives of the right-wing radical organizations "C14" and "Automaidan" immediately after the court session attacked Vasily Muravitsky and doused him with Zelenka.



Pavel Volkov
Journalist and blogger

He was arrested on **September 27, 2017** and charged under Part 2 of Article 110 of the Criminal Code of Ukraine – encroachment

on the territorial integrity of Ukraine (a group of persons) and Article 258-3 – other assistance to terrorists. Both Articles are incriminated to him for publications on the Internet and an allegedly found badge of a referendum observer in Donetsk. The group of persons (Part 2, Article 110) in the indictment appears as "unidentified", making it possible to unprovenly qualify the article of the prosecution as something more serious.

Despite Pavel's deteriorating health, the court refuses to change the measure of restraint to house arrest. At the same time, during the trial, a significant part of the evidence of the prosecution was declared inadmissible, and the conducted linguistic examinations confirm his innocence.

On July 5 and on August 27 the Shevchenko court of Zaporozhye again extended the measure of restraint imposed on the journalist to October 25, 2018. Volkov's defense sent a request to the European Parliament to pay attention to the arrested journalist.



Kirill Vyshinsky
 editor-in-chief
 of RIA Novosti Ukraine

Was detained by the SBU on **May 15, 2018** on suspicion of treason (Part 1, Article 111 of the Criminal Code of Ukraine). On the same day, the SBU conducted searches at the editorial office and in the homes of some of the employees of RIA Novosti Ukraine. According to the SBU, the reason to suspect Vyshinsky of high treason is that as early as 2014 the journalist allegedly justified the annexation of Crimea, and allegedly supported the self-proclaimed Donetsk and Lugansk "People's Republics". Proof of his "subversive activities" in Crimea allegedly is the state award of the Russian Federation. On May 17, 2018 the Kherson City Court took the decision to arrest Vyshinsky for 60 days without bail.

Vyshinsky's lawyer told "Uspishna Varta" that the searches had been carried out with violations, and the pieces of evidence that had been attached by the prosecution were inadmissible. Concern about the detention of Vyshinsky and the consequences that it can lead to in terms of the freedom of the country's media was expressed by the organization Reporters Without Borders (RSF), the Council of Europe, and the UN Office for Human Rights. The OSCE Representative on freedom of the media Harlem Desir called on the government to refrain from imposing restrictions on the work of journalists.

On July 11, the Kherson City Court once again satisfied the Prosecutor's Office's request to extend the term of the editor-in-chief of RIA Novosti Ukraine Kirill Vyshinsky's detention for another 60 days. The lawyer Andrey Domansky petitioned the court to take his client out on bail, arguing that he has many years of experience in human rights and social activities.

After reviewing the response of the government of Ukraine that was addressed to the European Federation of Journalists, the human rights platform "Uspishna Varta" stated that the government's position in the case of Kirill Vyshinsky is contrary to international law and the legislation of Ukraine. Based on the government's response, RIA "Novosti Ukraine" is not recognized by the authors of the document as a media agency or office of any of the Russian state news agencies registered in Ukraine. In their accusations against Vyshinsky, law enforcement bodies refer not to the results of the official examination of the content of the site, but to the information of the non-governmental organization with an controversial reputation "StopFake"



DETENTION OF INTERNET USERS FOR POSTS ON SOCIAL NETWORKS

Detention for posts on social media. After the publication of the decree of President Poroshenko on the prohibition of the Russian social networks VKontakte and Odnoklassniki in Ukraine in May 2017, during 2017-2018 the SBU publicly stated the facts of detaining persons who, as a rule, were called either administrators of "anti-Ukrainian" groups on social networks, or were the authors and/or distributors of "anti-Ukrainian posts". The detention of users of social networks continued in April-June 2018.

The SBU didn't report either the names or the place of residence of the detainees, and thus human rights defenders and lawyers cannot respond quickly to such cases.

“If we don't destroy the power, the power will destroy us.” For these words, written in a comment on a social network, a citizen of Ukraine was convicted to 3 years in prison by the decision of the Lutsky court of the Volyn region on June 30, 2017. His fault was that "acting intentionally, aware of his illegal actions and with the help of especially created accounts, 'Vasya Solomonyuk' on the social networks Facebook and VKontakte distributed materials containing public appeals to violently change the constitutional order and seize state power”.

According to the SBU, at the end of 2017 388 so-called "perpetrators" were arrested who were involved in the administration and moderation of anti-Ukrainian pages on the Internet. In all cases the SBU reported that the actions of the detainees were qualified under Article 109 (*actions aimed at violently changing or overthrowing the constitutional order or seizing state power*), Article 110 (*infringement of the territorial integrity and inviolability of Ukraine*), and Article 258-3 (*creation of a terrorist group or terrorist organization*) of the Criminal Code of Ukraine.

According to the statistics contained on the website of the Prosecutor General of Ukraine, **273 reports** on crimes under article 109 of the Criminal Code of Ukraine were entered into the Unified register of pre-trial investigations for the period 2017 and the first half of 2018. During this period, the Prosecutor's Office sent 182 indictments to the court (article 291 of the Criminal Procedure Code of Ukraine) to resolve the issue of guilt and 6 claims for the use of coercive measures of a medical nature (article 292 of the Criminal Procedure Code of Ukraine) - if a person committed a crime in a deranged condition or became ill with mental illness after committing a crime. I.e., there are 188 criminal proceedings in the courts of Ukraine.



RESTRICTIONS ON FREEDOM OF SPEECH BY LAW ENFORCEMENT AND SECURITY

However, the end result of consideration in court is not so impressive. According to the Unified state register of court decisions, the courts of Ukraine considered only 14 indictments of the Prosecutor under article 109. And most of them are accusations of public calls to violently change or overthrow the constitutional system or seize state power, as well as the distribution of materials calling for such actions. i.e., we are talking about *users of social networks, journalists, and political activists who used their right to freedom of speech and opinion.*

In 9 of the 14 judicial decisions under article 109 that were considered by the courts, the defendants admitted their guilt in full. As a consequence, the court limited itself to questioning the accused or approving an agreement between the accused and the Prosecutor for a guilty plea.

As a rule, the charges are generalized and simplified. Objective and subjective elements of the crime are not specified at all: the procedure established by the Constitution and the Laws of Ukraine for the establishment and operation of Supreme bodies of state power, the violation of which poses a threat to the security of the state in the political sphere, is not disclosed.

The frequency of the practice the indicting the accused under article 109 in a pre-trial deal suggests that prosecutors simply have no evidence to prove their accusations in court.

Despite the great exertion of pressure and control in these criminal cases, the judges acquit the suspect when they start to defend themselves, using their procedural rights. Of the 14 trials we reviewed under article 109, in 2 cases the court cases resulted in acquittal.

On December 7, 2017 the Sosnovsky district court of Cherkassy recognised as innocent and acquitted a citizen who was charged under article 109 of the Criminal Code. The composition of the crime, according to the investigator, consists of the fact that on March 23, 2014 they created the account "Viktor Glazev" and the public group "NOD Cherkassy" on the social network "VKontakte". And on 1 April in this same group another (!) user - under the nickname "Aleksandr Zhadan" - posted the video file "...attention..! Mobilization Of The South-East Of Ukraine..!". The acquittal of the court of first instance concerning this case is now being challenged by the Prosecutor's Office in the court of appeal. The human rights platform "Uspishna Varta" is monitoring this case, and we will reported about developments.

RESTRICTIONS ON FREEDOM OF SPEECH BY LAW ENFORCEMENT AND SECURITY



DEPORTATION AND NON-ADMISSION OF FOREIGN JOURNALISTS

During 2015-2018, the Security Service of Ukraine (SBU) and the National Security and Defense Council of Ukraine (NSDC) consistently introduced restrictive measures on the work of foreign, primarily Russian journalists in Ukraine. Contrary to the recommendations and comments of international organizations and monitoring missions, the practice of deportation and non-admission of foreign journalists in Ukraine continues.

The practice of deporting and banning foreign journalists from entering Ukraine, regulated by the decisions of the National Security Council and carried out by the SBU, is a violation of Ukraine's international obligations in the field of human rights. In particular, OSCE participating States have committed themselves to ensuring the conditions for journalists from one participating state to work in other participating States.

On February 19, 2015 the SBU published a **list of more than 100 media agencies of the Russian Federation** (including TV channels, news agencies, newspapers and Internet resources) whose journalists are no longer allowed to attend the press events of state bodies until the end of the anti-terrorist operation (from April 30, 2018 it is named the Operation of United Forces) in Donbass. A number of journalists from Russia were also not allowed to enter Ukraine and were denied entry for the next five years.

On September 16, 2015 President Poroshenko signed a decree on the decision of the National Security Council (September 2, 2015), in which **41 people from among foreign journalists and bloggers** (mostly Russian) were added to the list of 388 other persons (media professionals, artists, politicians) who were banned from entering Ukraine for a year. On May 31, 2016, the decree of President Poroshenko expanded the original list of persons on who restrictive measures were imposed, and sanctions were put on **17 more Russian journalists.**

On August 14, 2017 the SBU detained and deported the correspondent of the TV channel "Rossiya 24" **Tamara Nersesyan**, who was charged with damaging the national interests of Ukraine. She was banned from entering the country for the next three years. On July 26, for the same reasons, the SBU deported her colleague **Mariya Knyazeva** and banned her from entering the country on the basis of biased coverage of the situation in Ukraine. On 25 August 2017, the SBU refused to accredit two Spanish journalists **Antonio Pampliega** and **Manuel Ángel Sastre**, forbidding them entry for 3 years for "activities against the national interests of Ukraine".



On August 30, 2017 **Anna Kurbatova**, a journalist working for the Russian Channel 1, was detained by representatives of the SBU and deported from Ukraine. "This is how it will be for anyone who dares to disgrace Ukraine," said the official press-secretary of the SBU, commenting on the situation.

On May 2, 2018 the State Border Service at the request of the SBU didn't allow journalists **from Italy, the Czech Republic, and Russia** into Ukraine to cover commemorative events in Odessa, citing the fact that these journalists previously "unfairly covered the events in Ukraine".

On June 26, the State Border Service did not permit entry to a South African citizen, the "Russia Today" correspondent **Paula Slier**, and the Russian TV presenter, representative of the Union of Journalists of Russia **Evgeny Primakov**, who arrived in Kiev for the OSCE conference.

On July 10 the **British journalist John Warren** was not allowed to enter Kiev and was banned from entry for 3 years because of unauthorized visits to the Crimea in September-October 2015.

On July 18, the SBU banned the Chairman of the Union of Journalists of Russia Vladimir Solovyov from entering the country for three years.



On 30 August 2017, the OSCE representative on freedom of the media **Harlem Desir** expressed his concern about the practice of detaining and expelling foreign journalists from Ukraine. "The expulsion of journalists or refusal to grant them permission to enter Ukraine are excessive measures due to the fact that these actions do not have a sufficient level of transparency and a proper appeal mechanism," wrote Desir in his letter to Pavel Klimkin, the Minister of Foreign Affairs of Ukraine. "The OSCE participating States have pledged to provide conditions for journalists from one participating state to work in other participating States," he added. The OSCE called on the Ukrainian authorities to refrain from imposing unnecessary restrictions on the work of foreign journalists, which affect the free flow of information and violate OSCE commitments regarding freedom of the media.



As Human Rights Watch stated, "the Ukrainian government's practice of accusing journalists of having an anti-Ukrainian bias, and then to deport them or to deprive them of the right to enter, is a serious violation of international obligations in the field of human rights". As an example, HRW cites the example of Kurbatova, who was expelled from the country, because in her article she described the Independence Day of Ukraine (August 24) as a "sad celebration" because of the armed conflict in Eastern Ukraine and economic difficulties in the country.

STATUS OF SOCIETAL RESPECT FOR THE RIGHT TO FREEDOM OF OPINION AND EXPRESSION



PHYSICAL VIOLENCE AGAINST JOURNALISTS IN CONNECTION WITH THEIR PROFESSIONAL ACTIVITY

The report of the monitoring mission of the UN OHCHR and the annual report of the US State Department on "Human Rights Practices for 2017" noted that violence and harassment against journalists in Ukraine remained a problem during 2016-2017. Human rights groups and journalists have criticized the government's inaction in addressing these crimes, which creates a culture of impunity.

According to the monitoring "Index of physical safety of journalists in Ukraine", which the National Union of Journalists carries out together with partner organizations, during 7 months of 2018 53 incidents of physical aggression against journalists were recorded.

At the end of 2017, the National Union recorded 90 cases of physical aggression against media employees. Among the regions where media representatives are attacked most often - Kiev and the Kiev region (29 incidents); Odessa (10), and Donetsk (6). The organization requires law enforcement bodies to publicly report on the investigation of crimes against journalists and to make efforts to actually punish the attackers. The media community also demands parliamentary hearings on the physical safety of journalists.

On May 14, 2015 the Parliament adopted the law on amendments to the Criminal Code of Ukraine that stipulate increased punishment for threats or violence against journalists. In addition to the existing provision of article 171 (obstruction of professional activities of journalists), which was rarely put into

practice because of its ambiguity, four additional articles were added. They stipulate criminal liability for threats and bodily harm to journalists or their families, intentional damage to journalist's property, violation of the rights to life, and detention of a journalist as a hostage. The UN OHCHR considered that the law can make a positive contribution to the protection of media workers and promote freedom of expression in Ukraine.

The Ukrainian News news agency conducted an analysis of the investigation of crimes against journalists and consideration of these cases in courts in 2015-2017. Thus, during this period, 641 cases were brought to the ERDR on 5 "journalistic" articles of the Criminal Code. 38% of cases were closed at the investigation stage. 58% continued to investigate, but then closed the time limit. Of the 27 cases that fell in the courts in 2015-2017, 10 people were found guilty of violating the rights of journalists. Some of the convicts were released from punishment under the law "On Amnesty in 2016". **Thus, according to statistics, 96% of crimes against journalists in Ukraine remain unpunished.**



STATUS OF SOCIETAL RESPECT FOR THE RIGHT TO FREEDOM OF OPINION AND EXPRESSION

There is still **no progress in investigating the murders of journalists and bringing suspects to justice.**



On June 1, 2018 the Prosecutor General Yuri Lutsenko said on the air of the Ukrainian TV channel that there is no progress in the investigation into any of the narratives in the case of the murder of journalist **Pavel Sheremet**, who was blown up in his car on July 20, 2016. An alternative investigation conducted by independent organizations revealed that investigators had not questioned key witnesses and that the security camera recordings had not been verified.

On June 7, the Shevchenkivskyi court re-started the preparatory hearing on the case of the murder of journalist **Oles Buzina** (killed on April 16, 2015), canceling all previous results of the case. Scheduled for June 15, the next hearing on the case of the murder of Buzina was postponed to August 9 for a formal pre-text - the jury did not issue a memo.

Meanwhile, in the corridor representatives of right-wing radical groups shouted slogans: "Judge the separatist and not the soldiers!", "Judges remember, power is not eternal!", "Disqualify the judges!".

The process of reading the indictment to those accused of murdering the journalist **Vyacheslav Veremiy** (killed in 2014) continues, the Darnitsky district court continues to extend the period of detention of an accomplice to the murder of the journalist until September 13, 2018.

Police inaction and the lack of punishment for attacks on, and even the murders of journalists has generated a **wave of violence of right-wing radical groups against media representatives who "nationalists" consider to be "separatists"**. Law enforcement bodies do not prevent the riots and attacks of such groups, and they are not held accountable for the commission of crimes.

In addition, the following facts of attacks, including by right-wing radical groups against media and journalists, during 2017-2018 were documented:

On December 12, 2017 the journalist of the "NewsOne" channel **Ruslan Kotsaba** was beaten up on one of the streets of Kiev whilst polling citizens. The likely offender, who belonged to a far-right organization ("Right Sector"), posted information about the attack on Facebook.

STATUS OF SOCIETAL RESPECT FOR THE RIGHT TO FREEDOM OF OPINION AND EXPRESSION



On January 25, 2018 about 50 members of far-right groups broke into the **office of the "Union of Orthodox Journalists"**, insulted the members of the Union, and checked the information on their computers. The police present at the scene did not intervene. The group "C14" posted on Facebook a video of the attack committed by its members against the office.

According to the UN OHCHR, on 3 February, 2018 a female reporter was blocked by members of the far-right "C14" group, who threatened her. The police officers who were present did not intervene. On February 13, members of the far-right organization "Right Sector" forcibly took the journalist out of the courtroom in Odessa, calling him a "separatist". The police who were present in the courtroom did not intervene. A criminal case was initiated under Article 171 of the Criminal Code.

On 20 July, 2018 the well-known blogger **Pavel Khomiv** was beaten up in Lvov. According to preliminary information, the incident involved former members of the radical group "Right Sector". Law enforcement officers detained the attackers at first, but then soon released them.

On June 21, 2018 during a protest of nationalists in Kiev near the patrol police department the journalist of "**Sharj.NET**" Antonina Beloglazova suffered as a result of the actions of a malefactor, who poured an unknown transparent substance with a notable chemical smell on her head from a plastic bottle.

On the eve of a procession (July 27, 2018) disturbing news came from the information and educational department of the Ukrainian Orthodox Church about threats being made to children by members of radical groups with symbols of the organization "Svoboda" and an attack on the editor of the local newspaper "**Vesti Borznyanshchiny**" **Sergey Bliznyuk**, who wrote an article about an Orthodox youth camp in the Chernigov region. The clergy and laity unanimously adopted an appeal to the President and Minister of Interior in connection with the attacks on the Orthodox children's camp and the beating up of a journalist.

On August 3, 2018 in Kiev at the "**Ukrainski Novini**" **press center** about 20 representatives of an unknown right-wing radical group tried to disrupt the press conference. The attackers littered the press center with leaflets and threw chicken eggs at the speakers, as well as the administrator of the press center. The staff of the agency called the police, who arrived at the scene after the attackers had left.



HATE SPEECH AND THE WEBSITE "MIROTVORETS"



Both Ukrainian and international organizations have repeatedly expressed concern about the activities of the "Mirotvorets" website, which publishes lists of people (along with their personal data) who are allegedly associated with armed groups and are designated as "terrorists". Such a list violates the presumption of innocence, the right to privacy, and the protection of personal data.

The website was created in 2014 and positions itself as the "Internet representation of the Center for Research of Signs of Crimes against the National Security of Ukraine, Peace, Humanity, and the International Law". The website contains an open database of the personal data of people gathered

illegally (hacking, phishing) and via open source intelligence and published without the consent of those people whose data is being published, and who the authors call "separatists" or "agents of the Kremlin". The Ministry of Internal Affairs of Ukraine, SBU, and departmental and other law enforcement bodies of the country were listed among the partners of the website (since its launch and until May 13, 2016). The adviser to the Minister of Internal Affairs Anton Gerashchenko openly declares that he is the initiator of the creation of this website.

On 10 May, 2016 the "Mirotvorets" website published the personal data of **4,068 Ukrainian and foreign journalists** who were reportedly accredited to work in the "Donetsk People's Republic". In particular, they published the names, phone numbers, and addresses of the journalists of global media such as AFP, Al Jazeera, Le Monde, BBC, Reuters, and Forbes. The list also includes non-journalists who worked in Donetsk before the conflict.

The UN OHCHR expressed concern that the people on this list are portrayed in the regions controlled by Ukraine as cooperating with terrorists, and this could put them at risk. The OHCHR recalled the importance of ensuring the protection of personal data in order to prevent abuse, and notes that the website that published the data is the same website that is used by government forces at the contact line checkpoint.

STATUS OF SOCIETAL RESPECT FOR THE RIGHT TO
FREEDOM OF OPINION AND EXPRESSION

On May 24, 2016 the website "Mirotvorets" published the data of **another 304 media employees** (300 foreign and 4 Ukrainian), which led to negative consequences for the persons included in this list. Some media workers received threats and insults and were called "separatists". A number of journalists stated that their bank accounts had been frozen because they had been included in the list or had criticised the events of Maidan. The UN OHCHR also noted an increase in the online attacks of "trolls" and disinformation campaigns in social media against activists and media professionals involved in investigative journalism and transparency issues. Physical and online attacks are often not investigated, or investigations are delayed.

After a significant international response, the National Police opened criminal proceedings against the "Mirotvorets" website on 7 July 2017, and the Parliamentary Commissioner for Human Rights called for the website to be closed. The "Mirotvorets" website is still operational.

In December, 2014 **Anton Gerashchenko**, a people's deputy from the "People's Front" faction and adviser to the Minister of Internal Affairs **Arsen Avakov**, publicly called himself the **initiator of the creation of the website**.

Gerashchenko himself indicates **Georgiy Tuka**, who in 2015-2016 headed the Lugansk regional military-civil administration, and since 2016 - the Deputy Minister for temporarily occupied territories and internally displaced persons of Ukraine, as the founder of this website.

The specified Internet resource has several IP-addresses located outside Ukraine. **Thus, it is almost impossible to ban**

and close the website "Mirotvorets", as well as to exclude a person from the list of this website via the ruling of the national courts.

In addition to this, it is common practice when Ukrainian citizens are found guilty without trial only because of the fact that they were included in the list of the website "Mirotvorets". All of this, in the government's opinion, does not affect the protection of personal data expressed in the relevant Law. Thus, the state maintains this illegal practice by its silence.

Moreover, the information on the "Mirotvorets" website (to which information can be sent by any person) is recognised by the courts of Ukraine when making decisions.

Having studied judicial practice, the lawyers of "Uspishna Varta" came to the conclusion that the data of the "Mirotvorets" website is being used in court decisions at all stages - from the beginning of the pre-trial investigation to the conviction of the person.

In numerous rulings, judges also accept information from the "Mirotvorets" website as material evidence.

The use of this website applies not only to criminal cases, but also to civil legal relations and fact-finding acts, such as, for example, deprivation of parental rights or permission to travel abroad without a father.

The use of the "Mirotvorets" website's data by the judicial system, which is reflected in the rulings of certain judges, violates article 6 of the Convention, which guarantees everyone the right to a fair trial.



GENERAL RECOMMENDATIONS ON THE RIGHT TO FREEDOM OF SPEECH AND OPINION

In order to ensure the right to freedom of speech and opinion enshrined in Article 34 of the Constitution of Ukraine, as well as in Article 10 of the European Convention on Human Rights and Fundamental Freedoms and Article 19 of the International Covenant on Civil and Political Rights, ratified by the state of Ukraine, the following measures should be taken.

The President of Ukraine:

1. To take measures to stop pressure being put on the media and provide explanations for the intervention of the head of state or his subordinates in the activities of issuing licenses and the organization of media inspections.

2. Recall the representatives of the National Council of Ukraine on Television and Radio Broadcasting, appointed by the quota of the President.

3. In order to restore freedom of speech and exchanging information on the Internet, the prohibitions on accessing popular social networks and websites, which were introduced by the decrees of President Poroshenko in May 2017 and May 2018 within the framework of sanctions against Russia, should be lifted.

4. To impose a moratorium on the use of "separatist" articles of the Criminal Code by the Security Service and law enforcement bodies in relation to media representatives, the blogosphere, and Internet users, as well as the tapping and surveillance of journalists by the SBU.

5. To officially recognize the existence of political prisoners in Ukraine and to stop the prosecution of those whose cases are in the courts or at the pre-trial investigation stage; to promote amnesty and the rehabilitation of already convicted political prisoners.

6. To abandon the informal support for bloggers and opinion leaders (the so-called "Porokhobot") who demonstrate hatred and the practice of cyber-bullying against journalists and bloggers expressing an alternative position.

The Parliament (Verkhovna Rada Of Ukraine):

7. To bring legislation in line with international standards and the recommendations of the Council of Europe, the quotas for the Ukrainian language on television and radio should be reduced to 50%. The legislation of Ukraine regarding the introduction of language quotas (laws No. 3822-d of June 16, 2016 No. 5313 of May 23, 2017) should be revised by the Parliament as it contradicts:

- Article 34 of the Constitution of Ukraine, which guarantees the right to freedom of thought and speech, to freedom of expression and belief;
- Article 10 of the Constitution of Ukraine, which guarantees the free development, use, and protection of Russian and other languages of national minorities of Ukraine;
- Article 10 of the European Convention on Human Rights and Fundamental Freedoms and Article 19 of the International Covenant on Civil and Political Rights, ratified by the state of Ukraine;
- The obligations of the state of Ukraine under the European Framework Convention for the Protection of National Minorities and the European Charter for Regional or Minority Languages.

8. To restore the right to the free exchange of information and to remove all restrictive measures, including bans and restrictions on the import of Russian books, broadcasting of Russian films, and the entry of Russian actors, introduced by the Ukrainian Par-

GENERAL RECOMMENDATIONS ON THE RIGHT TO FREEDOM OF SPEECH AND OPINION



liament in 2015-2017. Such bans and restrictions violate the right to freedom of movement, information, and ideology, as well as the expression of one's own opinion, which are enshrined in the Constitution of Ukraine and in international acts ratified by Ukraine. In order to restore the right to the free exchange of information, all restrictive measures should be removed by amending the legislation:

- Law of Ukraine No.1317 "on amendments to some laws of Ukraine concerning the protection of the information television and radio space of Ukraine" dated December 09, 2014;
- Law of Ukraine No.3359 "on amendments to the Law of Ukraine 'on cinematography' (concerning films of the aggressor state)" dated 27 October 2015;
- Law of Ukraine No. 5114 "on amendments to some laws of Ukraine concerning the restriction of the Ukrainian market's access to foreign printed materials with anti-Ukrainian content" dated December 8, 2016;
- Law of Ukraine No. 6682 "on amendments to the Law of Ukraine 'on tour events in Ukraine' regarding the features of organizing and conducting tours with the participation of citizens of the aggressor state" of July 11, 2017, and others.

9. Refuse to consider bills that threaten the free development of the Internet in Ukraine and create a threat of extrajudicial blocking of Internet resources.

10. To hold parliamentary hearings on freedom of speech in Ukraine without delay.

11. To regulate the activities of the National Council of Ukraine on Television and Radio Broadcasting:

- Listen to the report and to recognize the unsatisfactory work of the National Council for 2017.

- Recall the representatives of the National Council appointed by the quota of the Verkhovna Rada.
- Ban the National Council for a period of one year from making unscheduled inspections of the media.
- At the legislative level, to introduce a transparent examination procedure for the content of TV and radio channels, on the basis of which the National Council can make decisions.

National Council of Ukraine on Television and Radio Broadcasting:

12. To be guided in their decisions on imposing fines and depriving media licenses by objective criteria and not by political expediency and the unspoken orders of the Presidential Administration;

13. Objectively consider the violations committed by the media close to President Poroshenko and his circle, including the proper assessment of the calls of journalists and guests of these media agencies of a xenophobic and anti-Semitic nature.

The Security Service of Ukraine and the National Security and Defence Council of Ukraine:

14. Ensure that any restriction of freedom of expression is established only as a specific and individualized way of responding to an obvious threat and is necessary and proportionate;

15. To stop the practice of deporting foreign journalists and banning them from entering Ukraine regulated by the decisions of the National Security and Defence Council and carried out by the SBU, which is a violation of the international obligations of Ukraine in the field of human rights. In particular, the participating States of the OSCE have committed themselves to provide conditions for the work of journalists from one of the



participating parties in other participant parties.

16. To apply the provisions of the legislation on combatting separatism in strict compliance with the obligations of States under Part 1 of Article 19 of the International Covenant on Civil and Political Rights, and should not be used to drown out opposition views or criticism or subject them to criminal persecution. In general, it is necessary to impose a moratorium on the use of the so-called "separatist articles" of the Criminal Code (state treason, encroachment on territorial integrity, overthrowing the constitutional system, etc.) in relation to media workers, journalists, and bloggers.

Prosecutor General's Office of Ukraine, Ministry of Internal Affairs:

17. To ensure that the Prosecutor General's office and the National Police conduct a transparent, timely, and effective investigation into attacks against the media and their employees, threats of physical violence, and other criminal acts that may constitute hindering the legitimate professional activities of journalists;

18. To provide an objective investigation into the attacks against journalists, including the cases of the murder of Pavel Sheremet and Oles Buzina;

19. To provide an immediate, effective, and impartial investigation into possible violations in connection with the activities of the website "Mirotvorets".

The All-Ukrainian Association «Uspishna Varta» is a human rights platform that unites lawyers, public figures, and volunteers with the aim of defending the political and civil rights and freedoms of the citizens of Ukraine, as well as supporting people and organizations that are persecuted for their political beliefs.

© 2018 Public organization «all-Ukrainian Association «Uspishna Varta»
Kiev, Ukraine
uspishna-varta.com



 0 800 200 555

 uspishnavarta@gmail.com

 uspishna-varta.com

 Kiev, Ukraine

Annex 37

Mediacentre n.a. I. Gasprinsky, Letter, 2 March 2023

(translation)

Translation**Mediacentre n.a. Ismail Gasprinsky, Letter, 2 March 2023.**

State Committee on Inter-
Ethnic Relations of the
Republic of Crimea (in
Ukrainian)

State Committee on Inter-
Ethnic Relations of the
Republic of Crimea (in
Russian)

State Committee on Inter-
Ethnic Relations of the
Republic of Crimea (in
Crimean Tatar)

**State Autonomous Institution of the Republic of Crimea Mediacentre n.a. Ismail
Gasprinskiy (in Russian)**

**State Autonomous Institution of the Republic of Crimea Mediacentre n.a. Ismail
Gasprinskiy (in Ukrainian)**

**State Autonomous Institution of the Republic of Crimea Mediacentre n.a. Ismail
Gasprinskiy (in Crimean Tatar)**

Trubachenko Str., 23a, Simferopol, Republic of Crimea, 295048, 8(918) 024-46-24, E-mail:
info@mediacentr.org.ru
TIN 9102192812, KPP 910201001, Reg. No. 1159102113455

**To the Ministry of Foreign Affairs
of the Russian Federation
Russian Federation, 119002,
Moscow, 32/34 Smolensky Blvd.**

**To Monastyrsky, Zyuba, Stepanov
& Partners
Russian Federation, 121099,
Moscow, 3 Novinsky Blvd., bld. 1**

**To Partner, Attorney at law
K.N. Udovichenko**

2 March 2023

Dear Attorneys at law!

**In response to your request for information about the work of Mediacentre n.a. Ismail
Gasprinskiy we inform on the following**

The State Autonomous Institution of the Republic of Crimea Mediacentre n.a. Ismail Gasprinskiy (hereinafter, "Mediacentre") considered the request for information dated 24 February 2023, sent by Monastyrsky, Zyuba, Stepanov & Partners, acting on behalf of the Ministry of Foreign Affairs of the Russian Federation.

Below we provide you with answers to the questions contained in the request concerning the work of the Mediacentre with printed publications in various languages of peoples living in Crimea, for their use in the preparation of the written position of the Russian Federation in the dispute initiated by Ukraine against the Russian Federation before the International Court of Justice.

On the setting up and objectives of the Media Center

The Mediacentre was set up in 2015 as part of the state programme for the ethno-cultural development of nationalities living in Russia. It is named after Ismail Gasprinskiy, a famous Crimean Tatar activist, who worked hard throughout his life to produce various newspapers and magazines, carried out educational activities with purpose to promote the Crimean Tatar language and to preserve and develop cultural diversity. Media Center has a similar aim – to support the production of media and literature in the languages of all peoples, ethnic groups, and national minorities, thus contributing to the preservation of languages, culture and traditions.

In the past seven years alone, we have published more than 220 books in the languages of the peoples living in Crimea: Crimean Tatar, Armenian, Ukrainian, Greek, Hebrew, German, Italian, Bulgarian and others.

Since our creation, we have continued to develop: every year the number of print media published at the expense of state subsidies increases, and all of them actively popularize the culture and literature of the Crimean peoples. Since 2019 we have a small printing house of our own. It is noteworthy that before 2014 there were very few such opportunities in Crimea.

The Media Center has three main areas of activity:

- support of 15 mass media, including in Russian, Crimean Tatar, Ukrainian, Armenian, German, Bulgarian and Greek languages;
- publication of books on the culture of the peoples of Crimea, including in Russian, Crimean Tatar, Ukrainian, Armenian, Bulgarian and Krymchak languages;
- organisation of events: conferences, presentations, round tables, etc.

Support of mass media operations

We support a range of mass media, most of which target specific ethnic groups in Crimea. At the moment, the Mediacentre n.a. I. Gasprinskiy has 15 different newspapers and magazines. Many of the publications have a very rich history and it is therefore important to support them.

A special place in the Media Center is given to Crimean Tatar periodicals. In particular, the Mediacentre publishes under its aegis:

- the weekly newspaper «Yan’i Dunya» (“New World”) – a publication with a unique history. It was first published in 1918 and changed within the development of the Crimean Tatar language. Its circulation is 1,000 copies.
- the magazine “Yildiz” (“The Star”) can be called a unique monument to the Crimean Tatar literary language. It was created during the years of the deportation of Crimean Tatars, and prominent Crimean Tatar writers and poets have published in it. Its circulation is 500 copies.
- the magazine “Arzy” is dedicated to the role of Crimean Tatar women in history and literature. It was created recently, but continues the tradition established back in 1906 by Ismail Gasprinskiy’s daughter, Shefika, leader of the Muslim women’s movement. Its circulation is 200 copies.
- the newspaper “Meraba” (“Hello”) is a relatively new publication (it was created in 2015) that on a weekly basis publishes information about the latest developments not

only in the lives of Crimean Tatars but also of other peoples of Crimea. Its staff also takes part in radio and TV programmes where they discuss current news. Its circulation is 1,000 copies.

- the magazine for teachers of the Crimean Tatar language «Ana tili odzhalaryna» provides methodological and didactic support for the teaching process and also gives advice on how to preserve the mother language in families. Its circulation is 500 copies.

The newspaper “Yan’i Dunya” was shortlisted (10 best projects) and placed 6th at the All-Russian Public Award for Preservation of Linguistic Diversity of the Russian Federation “Key word”, in the nomination “For Contribution to Preservation of Mother Language”. In 2022, 232 applications from 61 regions of the Russian Federation and from Belarus were received for this competition.

We also attach great importance to preserving the languages and cultures of other peoples of Crimea.

To support the functioning of the Ukrainian language, the newspaper “Krymsky Visnyk” (“Crimean Herald”) publishes both ethnographic essays and articles on topical issues. Its circulation is 500 copies.

The Mediacentre also publishes media aimed at other peoples: for example, the newspaper “Hoffnung” (“Hope”) is intended for Crimean Germans, who participate directly in its production (its circulation is 500 copies); the magazine “Dove of Masis”, which was founded as far back as 1855 and is publishing periodically for almost 30 years, tells about the history, culture and famous personalities of Crimean Armenians (its circulation is 500 copies); the Bulgarian newspaper “Izvor” (its circulation is 500 copies) are published for Crimean Bulgarians, and the newspaper “Tavrik” is for Greeks.

It is up to the staff of the publications to decide on the content, and it is important to us that the newspapers and magazines involve people from specific cultures.

We consider it important to create and support mass media that could be of interest to Crimeans from different ethnic backgrounds. For example, the magazine “Crimea” publishes literary works in Crimean Tatar, Ukrainian and Russian. The cultural and educational magazine “Our Crimea”, which was founded in 2016, tells both about the culture of Crimea in general (architecture, theatre, traditions of the people, iconic figures) and about activities and events of separate national-cultural formations, and a certain part of each issue is devoted to one of the peoples of Crimea. And our new project – youth magazine “We! Youth magazine Crimea” – has no “nationality” at all. Its target audience is all Crimean youth. It publishes materials in the 3 national languages.

All mass media that were registered on the peninsula before 2014 and expressed a desire to re-register were able to do so after submitting the relevant application without any bureaucratic delays and within the time limits stipulated by Russian law.

Publication of socially significant literature

We believe that the foundation for preserving both the functionality of language and culture is books, so the Mediacentre also publishes socially significant literature. A particularly important area

is the publication of books in native languages.¹ To control the quality of published literature, the Mediacentre has an Advisory Council for publishing socially significant literature in native languages that includes writers, teachers, academics and journalists, including those of Crimean Tatar, Ukrainian, Armenian and Greek origin.² The Advisory Council meets at least once a year to review manuscripts whose authors or compilers have applied for inclusion on the list for publication at the expense of the state budget.

In the seven years of its existence, more than 220 books in Crimean Tatar, Ukrainian, Bulgarian, Armenian, Hebrew, Krymchak, and Russian have been published, as well as books about the culture of other nationalities: Karaites, French, Estonians, Greeks.³ The publication of literature and printed mass media in the languages of the peoples of Crimea is financed both from the federal budget (Federal Agency for Nationalities) and from the budget of the Republic of Crimea.

In accordance with Federal Law No. 77-FZ dated 23 November 1994 “On Mandatory Copies of Documents”, part of the circulation of publications published with the assistance of the Mediacentre is distributed free of charge to libraries, including outside Crimea. In particular, the Media Center sends:

- to the federal executive branch in the area of the press, mass media and mass communications one obligatory copy of all types of printed publications;
- to the Russian State Library mandatory copies of all types of printed publications for subsequent distribution to the largest libraries and information institutions (from 3 to 16 copies);
- to the Russian State Library, within seven days from the date of publication of the first batch of printed publications using information and telecommunications networks two mandatory copies of the printed publications in electronic form, certified by a qualified electronic signature;
- to the State Budgetary Institution of Culture of the Republic of Crimea «Crimean Republican Universal Scientific Library named after I.Y. Franko» three mandatory copies of all types of printed publications.

Also, in accordance with the Law of the Republic of Crimea “On Mandatory Copies of Documents” dated 22 March 2017 No. 368-ZRK/2017 the Mediacentre sends three mandatory copies of all types of printed publications to the State Budgetary Institution of Culture of the Republic of Crimea “Republican Crimean Tatar Library n.a. I. Gasprinskiy” if the publication is done in Crimean Tatar language or concerns Crimean Tatars.

¹ See, for example, Y. Bolat, A FLOCK OF SHEEP CAUGHT IN A STORM. TRANSLATION FROM THE CRIMEAN TATAR INTO RUSSIAN, UKRAINIAN, ARMENIAN (Mediacentre n.a. I. Gasprinsky, 2020) (Exhibit A); L. Ukrainka, A FLOWER IN THE PALM OF ETERNITY. SELECTED WORKS (Mediacentre n.a. I. Gasprinsky, 2021) (Exhibit B).

² See Mediacentre n.a. I. Gasprinsky, Membership Composition of the Advisory Council on the publication of socially important literature in native languages at the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky” (Exhibit C).

³ See Mediacentre n.a. I. Gasprinsky, List of books published by the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky” (Exhibit D).

Multiple copies of the books are sent to the Ministry of Culture of the Republic of Crimea and distributed throughout the library network of the whole peninsula.

According to their content and focus, the publications are donated to national-cultural autonomies and other public organizations of the Republic, many of which have established their own libraries based on the books, albums and almanacs published by the Media Center.

The Mediacentre prides itself on books that glorify the exploits of the multinational people of Crimea during the Great Patriotic War. For example, under aegis of the Media Center were published the book “Loyal Daughters of Crimea. Officers, Partisans, Underground Women” describing the valor and contribution to the victory of Crimean Tatars in the war years,⁴ a photo album for the 100th anniversary of Amet-Khan Sultan, twice Hero of the Soviet Union, “Kyrymnin Sadyk Kzyzy” about the exploits of Hero of Russia Alime Abdennanova.⁵ The Mediacentre also supported the publication of the multi-volume book “Contribution of the Repressed Peoples of the USSR to the Victory in the Great Patriotic War of 1941-194”» and the multi-volume book “Reverse side of the war” dedicated to the exploits of Crimean Tatars among others.⁶

In addition, the Mediacentre is publishing facsimile editions of the rarest books that exist in Crimean libraries in a single copy.

The Mediacentre’s website works active, with the most current news from the national-cultural associations of Crimea and PDFs of all newspapers and magazines published by Media Center. There you can also find books published during all the years of the organization's existence.

Organisation of events, educational activities

We also see our aim as promoting and developing the culture of Crimea and its nationalities, and so we regularly hold conferences, round tables and meetings on various subjects, celebrate memorable dates in the history of Crimea and, of course, organise presentations of our new books. In all, we have organised and participated in 28 events in 2022, including:

- Cheronopolye Village, Belogorsk District, Greek holiday “Panair”;
- Chutuf-Kale Fortress, Bakhchisaray District, Crimean Karaites’ Cultural Days;
- Simferopol, Republican Crimean Tatar Library n.a. I. Gasprinsky, Library Forum “Crimean Tatar Book”;
- Simferopol, International Round Table “Development of Links between Crimean Ukrainians and their Compatriots Abroad”;
- Simferopol, Crimean Tatar State Academic Musical and Drama Theatre, Khydyrlez national holiday;

⁴ L. Khalilova, FAITHFUL DAUGHTERS OF CRIMEA: OFFICERS, PARTISANS, UNDERGROUND WOMEN (Mediacentre n.a. I. Gasprinsky, 2020) (Exhibit E).

⁵ U. Edemova, THE HERO GIRL OF THE CRIMEAN TATAR PEOPLE (Mediacentre n.a. Gasprinsky, 2020) (Exhibit F).

⁶ S. Akieva, R. Kurtseitov, CONTRIBUTION OF THE REPRESSED PEOPLES OF THE USSR TO VICTORY IN THE GREAT PATRIOTIC WAR OF 1941-1945, VOLUME II. CRIMEAN TATARS, BULGARIANS, GREEKS AND ARMENIANS OF CRIMEA MESKHETIAN (AHISKA) TURKS (Mediacentre n.a. I. Gasprinsky) (Exhibit G).

- Peschanoye Village, Bakhchisaray District, interethnic youth forum;
- Bakhchisaray, Central Library n.a. A.S. Pushkin, historical excursus “In the Unity of the Peoples of Crimea”;
- Simferopol, meeting of the Public Council for Harmonisation of Interethnic Relations;
- Simferopol, Republican Crimean Tatar Library n.a. I. Gasprinsky, literary readings “The World of Ismail Gasprinsky”;
- Simferopol, Republican Crimean Tatar Library n.a. I. Gasprinsky, International Book Giving Day, “Give Books with Love” event;
- Simferopol, mourning events dedicated to the Day of Remembrance for victims of the deportation from Crimea;
- Simferopol, Gagarin Park, Crimean Tatar Flag Day;
- Simferopol, Beloye-5, participation in the celebration of “Eid al-Fitr”;
- Simferopol, Beloye-5, Crimean Tatar national holidays “Derviza”;
- Kerch, V.G. Belinsky Central City Library, library forum “Crimean Tatar Book”;
- Feodosiya, festival of Crimean Tatar culture “Kefe Gulleri”;
- Simferopol, Crimean Tatar Academic Music and Drama Theatre, festival of Crimean Tatar culture “Qirim Naghmeleri”;
- Simferopol, Republican Crimean Tatar Library n.a. I. Gasprinsky, Crimean Tatar Writing and Culture Day;
- Simferopol, International Round Table “Development of links between Crimean Tatars and their compatriots abroad”.

We already have 24 events planned for 2023, and the number is growing.

We also help to develop national journalism in Crimea – we regularly host internships for journalism students who learn how to work in a creative multicultural environment, also we organise seminars, forums and workshops for young aspiring journalists.

2 March 2023

[SIGNATURE] Vagan Vazgenovich Vermishyan,
Head of State Autonomous Institution of
the Republic of Crimea Mediacentre n.a.
Gasprinsky

LIST OF EXHIBITS:

Number:	Name:
Exhibit A	Y. Bolat, A FLOCK OF SHEEP CAUGHT IN A STORM. TRANSLATION FROM THE CRIMEAN TATAR INTO RUSSIAN, UKRAINIAN, ARMENIAN (Mediacentre n.a. I. Gasprinsky, 2020).
Exhibit B	L. Ukrainka, A FLOWER IN THE PALM OF ETERNITY. SELECTED WORKS (Mediacentre n.a. I. Gasprinsky, 2021).
Exhibit C	Mediacentre n.a. I. Gasprinsky, Membership Composition of the Advisory Council on the publication of socially important literature in native languages at the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”.
Exhibit D	Mediacentre n.a. I. Gasprinsky, List of books published by the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”.
Exhibit E	L. Khalilova, FAITHFUL DAUGHTERS OF CRIMEA: OFFICERS, PARTISANS, UNDERGROUND WOMEN (Mediacentre n.a. I. Gasprinsky, 2020).
Exhibit F	U. Edemova, THE HERO GIRL OF THE CRIMEAN TATAR PEOPLE (Mediacentre n.a. Gasprinsky, 2020).
Exhibit G	S. Akieva, R. Kurtseitov, CONTRIBUTION OF THE REPRESSED PEOPLES OF THE USSR TO VICTORY IN THE GREAT PATRIOTIC WAR OF 1941-1945, VOLUME II. CRIMEAN TATARS, BULGARIANS, GREEKS AND ARMENIANS OF CRIMEA MESKHETIAN (AHISKA) TURKS (Mediacentre n.a. I. Gasprinsky).

Y. Bolat, A FLOCK OF SHEEP CAUGHT IN A STORM. TRANSLATION FROM CRIMEAN TATAR TO RUSSIAN, UKRAINIAN, ARMENIAN (Mediacentre n.a. I. Gasprinsky, 2020).

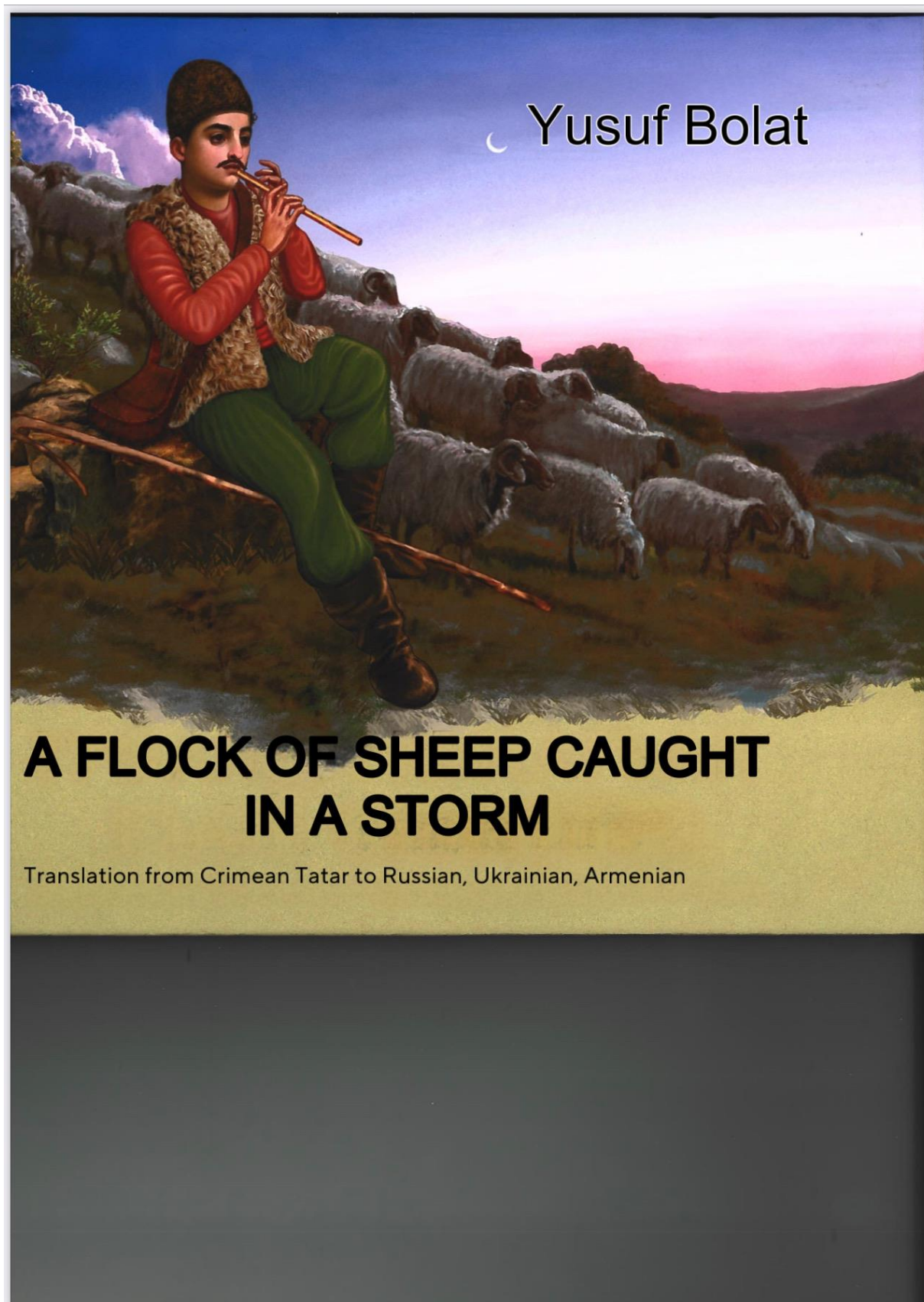
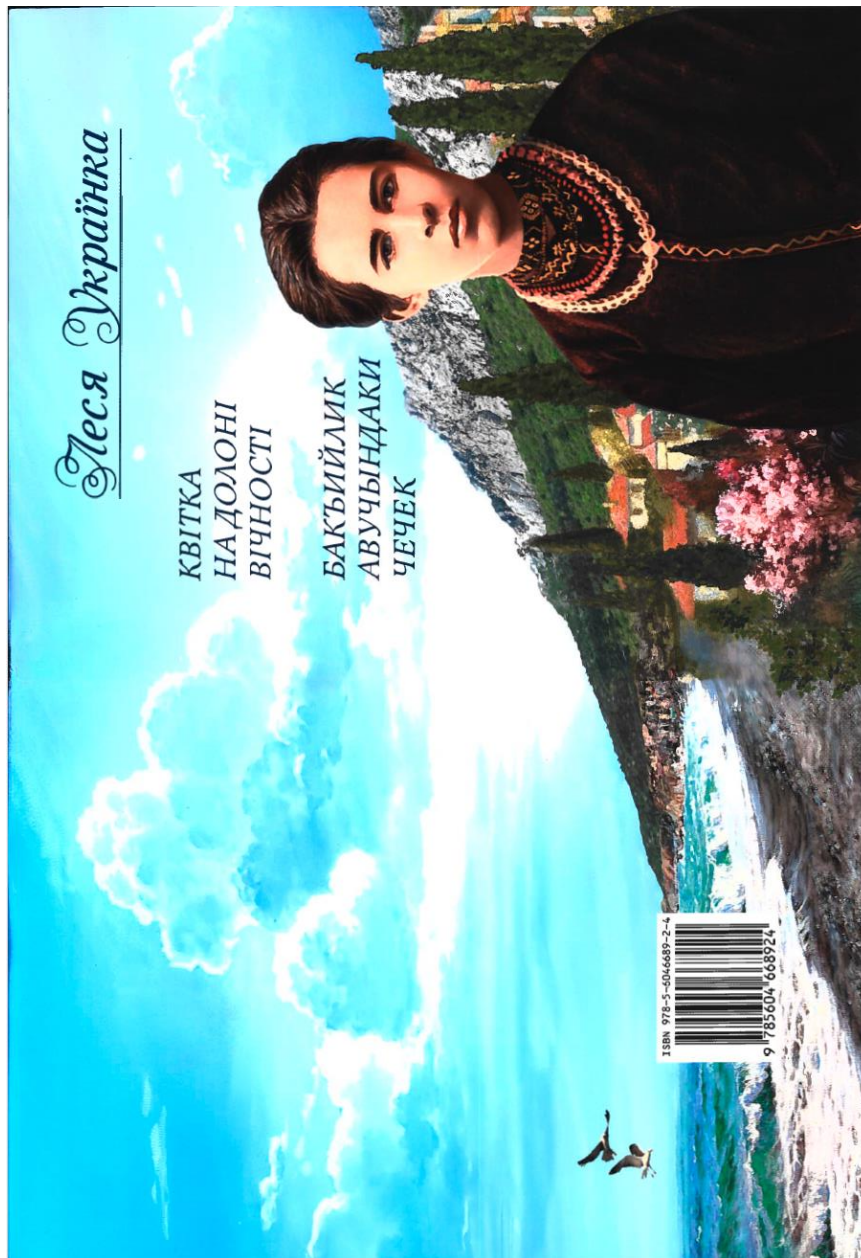


Exhibit B

L. Ukrainka, A FLOWER IN THE PALM OF ETERNITY. SELECTED WORKS (Mediacentre n.a. I. Gasprinsky, 2021).



Lesya Ukrainka
A Flower in the Palm of Eternity

UDC 821.161.2
BBK 84(Ukr)
U 45

Published by the Ismail Gasprinsky Media Centre state-funded autonomous institution of the Republic of Crimea with the support of the State Committee for Interethnic Relations of the Republic of Crimea on funds from the federal budget and from the budget of the Republic of Crimea. Approved by the Advisory Council on publication of socially important literature in native languages under the Ismail Gasprinsky Media Centre state-funded autonomous institution of the Republic of Crimea.

Not for commercial distribution

Lesya Ukrainka

A Flower in the Palm of Eternity. Selected works. Simferopol, I. Gasprinsky Media Centre state-funded autonomous institution of the Republic of Crimea, 2021, 168 pages, In Ukrainian and Crimean Tatar languages.

ISBN 978-5-6046689-2-4

The artistic legacy of Lesya Ukrainka is fertile soil for researchers of the phenomenon of literary space and time. Translation is also a path to the Poet. There is always a small miracle of turning "the indifference of a dictionary" indifference" into a trembling vibration of the strings of one's soul.

UDC 821.161.2 BBK84(Ukr)

ISBN 978 5-6046689-2-4

© Lesya Ukrainka, author, 2021

© Basyrov, V., compiler, 2021

© Kandymov, Yu., translation from Ukrainian into Crimean Tatar, 2012

© I. Gasprinsky Media Centre state-funded autonomous institution of the Republic of Crimea, 2021,



СХІДНА МЕЛОДІЯ

Гори багрянцем кривавим спалахнули,
З промінням сонця західним прощаючись, —
Так моє сонце жалем загорілося,
З милим, коханим моїм розлучаючись.

Геть понад морем, над хвилями синіми
В'ються, не спиняється чаєчки білії.
Де тебе мають шукати не безвісті,
Милій мій, думи мої бистрокрилії?

В себе на вежі вогонь запалила я,
Любий, твого воріття дожидаючись,
Хай він просвітить по морю доріженьку,
Щоб не зблудив ти, з чужини вертаючись.

Світле мій! буду тебе дождатися,
В чорну, смутну фереджію* повітатя,
І посаджу кипарисову гілочку,
Буде щодня вона слівцями политая.

А як повернешся, я покажу тобі
Той кипарис мій в садочку квітчастому,
Здійметься він над всіма мінаретами
В краї сьому, на мечеті багатому.

Ялта, 27.01.1897 р.

* Фереджія — покривало магометанок.

ШАРКЪ НАГЪМЕСИ

Дагълар кийди къан къырмызы либасыны
Ведлашып ал кунешнинъ шавлассинен.
Тыпкъы шойле, гъямдан янды юречигим,
Айрылгъанда джандан азиз севгиминнен.

Узакъ денгиз, мавы далгъа узеринде
Авелене, учушалаар чагъалаалар.
Сени къайда, бельгисиз бир ерлердеми
Аккъанатавы ойлаарым, айт, арасыналар?

Севгимим, сенинъ къайтып кельменгъни беклеп,
Агеш якътым ичимдеки къуллаелерде.
Гъурбет ильден къайткъанда ёл джоймасын, деп,
Айдынаатсын ёлныгъынгъны денгизлерде.

Эфкъары ве сим-сия бир фереджеге
Сарылып, мен сени, нурым, беклейджегим.
Отуртаджагъым къара сельби фиданыны,
Эр хунъ онгъа козьяшларым текеджегим.

Къайтып кельсенъ сангъа оны косьтереджегим,
Гульбагъчамда осер къара сельбичигим.
Юкселир о джамилерге зенгин диярда
Минарелер узьре къара сельбичигим.

Ялта, 27.01.1897 с.

A literary/artistic publication

Lesya Ukrainka
A FLOWER IN THE PALM OF ETERNITY

Selected Works

Compiled by V.M. Basyrov

Translated from Ukrainian into Crimean Tatar by Y.U. Kandymov

Preface by Doctor of Philology, professor, senior research fellow of the Fevzi Yakubov Research Institute for Crimean Tatar Philology, History and Culture of the Ethnic Groups of the Crimea V.I. Gumenyuk

Ukrainian texts edited by N.Y. Seitvelieva

Crimean Tatar texts edited by: N I. Bekirov, E R. Ajalimova

Artist: R I. Vaapov

Crimean Tatar text proofread by S.S. Sitzhalilova

Computer layout by E R. Ajalimov

Signed to print: 02 August 2021. Format: 70x100 1/16.

Offset printing. Font: BannikovaC. Conventional printed sheet: 13.65.

Quantity: 10.5 conventional printed sheets. Circulation 300 copies. Order No. 21 -14795.

I. Gasprinsky Media Centre state-funded autonomous institution of the Republic of Crimea
23-a Trubachenko Street, Simferopol, 295048, Republic of Crimea

E-mail: mediacenter2015@mail.ru | OGRN 1159102113455

Printed by CONSTANT LLC printing house

1/12 Berezovaya Street, Severny, 308519, Belgorod region

Phone/Fax +7 (4722) 300-720, www.konstanta-print.ru

Exhibit C

Mediacentre n.a. I. Gasprinsky, Membership Composition of the Advisory Council on the publication of socially important literature in native languages at the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”.

Membership Composition of the Advisory Council on the publication of socially important literature in native languages at the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”

Chairman:	
VERMISHYAN Vagan Vazgenovich	Director of the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”
Deputy chairman:	
IBRAGIMOVA Adile Aidynovna	Deputy Director for editorial and publishing activities of the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”
Secretary:	
VESELOV Andrey Viktorovich	executive secretary of the publishing department of the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”
Council members:	
YAKUBOV Ruslan Rishatovich	First Deputy Chairman of the State Committee for Interethnic Relations of the Republic of Crimea;
GLUSHCHENKO Elizaveta Alexeyevna	Deputy Minister of Internal Policy, Information and Communications of the Republic of Crimea;
PATRUSHEV Sergei Anatolievich	Head of the Department of Museums, Libraries and Culture Education of the Ministry of Culture of the Republic of Crimea;
OSMANOV Dlyaver Kazimovich	Head of the Department of Interethnic Relations and Socio-Cultural Adaptation of Migrants;
JAGYAEVA Gulnara Sabrievna	Director of the state budgetary institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”;
SELENDILY Lemara Sergeevna	Doctor of Philology, Professor of the Department of Crimean Tatar Philology at the Institute of Philology of the Vernadsky KFU, Secretary and Coordinator of the Council of Crimean Tatars under the auspices of the Head of the Republic of Crimea;
LAPTEV Yuri Nikolayevich	Director of the State Budgetary Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”;
RICKMAN Grigory Mihailovich	Member of the All-Russian Public Organization "Union of Journalists of Russia", PhD in Biology, Chairman of the Board of the Local National and Cultural Autonomy Public Organization “Mediacentre n.a. I. Gasprinsky”;

GANIEVA Emine Suleymanovna	PhD. in Philology, Associate Professor, Dean of the Faculty of History, Arts, Crimean Tatar Language and Literature
BASYROV Valery Magafurovich	Chairman of the Board of the Public Organisation “Union of Writers of the Republic of Crimea”, Director of the Limited Liability Company “Izdatelstvo Dolya”
EDEMOVA Urie	Crimean Tatar writer, novelist
VELIEV Ablyaziz	Head of the Laboratory of the Research and Development Institute of Crimean Tatar Philology, History and Culture of Ethnic Groups of the State Budget Educational Institution of the Republic of Crimea “Fevzy Yakubov KIPU”;
GRIDCHINA Anastasia Sergeevna	Chairman of the Council of the Regional Public Organisation "Ukrainian Community of Crimea";
OSMANOV Dlyaver Ibraimovich	Editor-in-chief of the literary magazine Yildiz;
SULEIMANOV Seyran Akbaraliyevich	poet, novelist, editor-in-chief of the newspaper Yan’y Dunya;
SHONUS Ivan Aristovich	Deputy Chairman of the Committee of the State Council of the Republic of Crimea on People's Diplomacy and Interethnic Relations, Chairman of the public organisation “Tavrída Regional National and Cultural Autonomy of Greeks of the Republic of Crimea”

Exhibit D**Mediacentre n.a. I. Gasprinsky, List of books published by the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”.****List of books published by the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”****10 books published in 2015.**

##	Title
1.	"Russia, the West and the Muslim World", I. Gasprinsky;
2.	"Chynlar ve maneler", K.Jamanakli;
3.	"Eight Steps in the Footsteps of a Teacher", R. Shakir-Aliyev;
4.	"The I. Gasprinskiy Crimean Tatar Republican Library: 25 Years";
5.	"Fikir Injileri, U. Kurkchi;
6.	"Takdirler Alemi", S. Medjitova;
7.	"Calendar of Significant and Commemorative Dates", D. Belyalova;
8.	"Tales and Legends of the Tatars of Crimea";
9.	"Bekle meni den'iz", B. Ablaev;
10.	"Ocalar", L. Haibullaeva, Z. Islyamova.

23 books published in 2016.

##	Title
1.	"Fikir Injileri;
2.	"San'yrzyz alem", A. Veliyev;
3.	"Origin of the Crimean Tatars", A. Memetov;
4.	"Crimean Bulgarians: Historical and Ethnographic Sketch", I. Noskova;
5.	"Crimean Tatar violin music", N. Amedov;
6.	"The Book of Travel. Crimea and Adjacent Regions", by E. Chelebi;
7.	"The historical and cultural heritage of the Crimean Karaites";
8.	"The Germans of Crimea. The Spirit of Activity", Y.N. Laptev, Y.K. Gempel;

9.	"Kyrymchahlar", N. Sumina;
10.	"The Almanac";
11.	"Tales and Legends of the Crimean Tatars";
12.	"The Peoples of Crimea", Laptev Y.N., Prokopenkov V.N.;
13.	"Tylysimli masallar", R. Suleymanov;
14.	"Sailama Eserler", R. Fazil;
15.	"Aineji tilkichik", Dermenji;
16.	"Tylysymly kyuvet", L. Shamil;
17.	"Qyssa-i Yusuf", by Khalil oghlu Ali;
18.	"Masallar balalar ichun", A. Useinov;
19.	"Alim akında yır, legend ve khatyrlav jıyıntığı";
20.	"Aivanlar akında masallar", L.N. Tolstoy;
21.	"Kyrym Tatar Masallar ve Legendalar";
22.	"Balychyk ve balikchi akynda masal", A.S. Pushkin;
23.	"Masallar", H.H. Andersen;

33 books published in 2017

##	Title
1.	"Tales and Legends of the Crimean Tatars" in Russian
2.	"Yurek syrlarym" collection of poems in the Crimean Tatar language by V. Kipchakova
3.	"Ismail bey Gasprinsky. Ayats ve faalieti" by S. Gafarov, translated by R. Fazil.
4.	"Chokarak" collection of selected poetry, in Crimean Tatar by B. Mambet
5.	"Crimea. Surb Khach Monastery" in Russian and Armenian
6.	"Unruly Taurica. Asandr" in Russian by Kesmeji
7.	"Eger anamny tapsa edim..." a collection of stories in Tatar, by Ilyasova
8.	"Altyn Ornekler" (golden patterns) collection of stories in Crimean Tatar, Useinova
9.	"Combat Officers", Veliyev

10.	"Crimean Tatar artists, masters of arts and crafts and architects", E. Cherkezova
11.	"Buyuk-As", by U. Kenzhikaeva, in Crimean Tatar and Russian
12.	"Crimean Tatars in the underground guerrilla movement in the Crimea during the Great Patriotic War (1941-1944)". Documentary study, in Russian. Author R. Muzafarov
13.	Baar (novel) by I. Abduramanov, in Crimean Tatar
14.	"Halk shairi Eshmyrza" (facsimile edition), by Eshmyrza
15.	"In Search of the Elixir of Rebirth", in Russian. Author F.Y. Yakubov
16.	"Vatanda bir ev kurayym", (story) in the Crimean Tatar language. Author M. Mambetova
17.	Zamanyymyzy karamany (A Hero of Our Time), by M. Lermontov (facsimile edition), in Crimean Tatar
18.	"Ikyayeler" (stories), by M. Gorky (facsimile edition), in Crimean Tatar
19.	"Ornamental Embroidery of the Crimea" (facsimile edition), by P.Y. Chepurina in Russian
20.	"Almanac No. 7". A collection of stories by Armenian writers in Russian and Armenian
21.	"Children's notebook" work for accordion and accordion, by Ibadlaev
22.	
23.	"Eski kyuyu" (The old well) by Memetov N.
24.	"Tatar Tilinin Grammatics. Phonetics, Morphology, Syntax", by E. Kurtmollaev, A. Islyamov.
25.	Wings Grow in the Sky, by Chalbash E.U., in Russian
26.	"Altyn Yuzyuk" (Equiritual songs) by Pintya I.V.
27.	"Current Problems of Crimean Tatar Philology" in Russian, by A.M. Emirova.
28.	"Vak'yt beklemey" (Time does not wait) by Emirov A., in Crimean Tatar
29.	Crimean Tatar children's calendar - flip-flap, AZ Author Yunusova E.R.
30.	"Concordance of Hearts" Translations of poems into Russian. Translation by Golubeva O.
31.	"Aziz Khalkyma" (To My People), a collection of poems, in the Crimean Tatar language. Author Asanin I., compiled by Khairedinova Z.Sh.
32.	"The Estonian settlement of Konči Šavva", by Salman L., in Russian
33.	"Chechekler aleminde" (The World of Flowers), in Crimean Tatar by A. Osmanova.

33 books published in 2018

##	Title
1.	"The Greeks of Crimea" in Russian, by Panayot Kesmeji
2.	Ilk bilgiler (First Knowledge) - A collection of poems and stories for children aged 3 to 12 about holidays, national heroes and traditions of Crimean Tatars in Crimean Tatar, author: Hayredinova Nial
3.	Adalet kureshi saflarynda (In the ranks of the struggle for justice) Book 4 in the Crimean Tatar language, by: Zera Bekirova
4.	"With Dance Through Life" in Russian, by R.U. Bakkal
5.	Author's album "Songs embroidered with threads" in Ukrainian and Russian, compiled by: Roik V.M.
6.	"Scraps of Memory" collection of works in Russian and Armenian, by Rushan Pilosyan
7.	"Belarusians" in Russian by author-compiler Balayan B.S.
8.	"Kyrymtatardzha laf etmege ogrenemiz" (Learning to speak Crimean Tatar), phrasebook in Crimean Tatar and Russian, by N.M. Ganieva, L.M. Bryukhova.
9.	"Gonyul Ezgileri" (Songs of the Soul), a collection of poems in the Crimean Tatar language, by A. Osmanova.
10.	"The Three Ages of Osmanchik" in Russian, by Tabakurskaya L., Timirgazin A.
11.	Almanac No. 8, 2018. A collection of stories by Armenian writers in Russian and Armenian
12.	Halk Sevgisini qazangan yirji, in Crimean Tatar, compiled by: Z. Bekirova.
13.	"The Bulgarians of the Crimea. Return to the roots" Photo album in Russian and Bulgarian by Ludmila Radeva
14.	The White Book of the National Movement of the Crimean Tatars in Russian, by Y.B. Osmanov.
15.	"The Russian Community of Crimea: the Road to Russia.Part 1.Memories of Veterans of the Community" in Russian, co-authored by I. Evtyushkin.B.
16.	"Traditional culture of the Crimean Tatars", Compiler-Editor: Churlu Mamut
17.	"Approaching the Horizon", by S.G. Yurieva, N.G. Yurieva
18.	"Sary Gul", by: Kadirova Uriye.
19.	"Uzyulgen zynjyr" by: Pashi I., compiled by: Salyadinov K.
20.	"Sailama eserler", by Ipchi U., compiled by Ipchi Y.

21.	"Tan'nag'mesi", by: Seytumerova Alie
22.	"The Karaite cemetery in Feodosia. History Sealed in Stone" by V.A. Eliashevich.
23.	"Sailama eserler", by: Edemova Uriye
24.	"Kechmish ile kuryushuv", by: Bekirov Sh.A.
25.	Music by Fevzi Aliyev, author: Aliyev F.
26.	"Qalbmimnin Ai Zary", by: Chaylak Refat
27.	Facsimile edition of "Yahshy ne ve yaramai", by V. Mayakovsky
28.	Facsimile edition of "Kyrym Eskizleri", by A.M. Gorky
29.	"My favourite Crimea", Wreath of Crimean Graces Project, by: Shevchenko T.
30.	Facsimile edition of Adji Murat, by L.N. Tolstoy
31.	"In the Museum of History, Culture and Religion of the Crimean Karaites-Türks named after Tamara Ormeli", author: Polkanova A.Yu.
32.	"In the Afternoon", by: Petrosyan M.A.
33.	"The Krymchaks. Historical and Ethnographic Sketch" by Achkinazi I. V.

36 books published in 2019

##	Title
1.	"Crimean Tatar poetry of the Khan period" set of postcards in Crimean Tatar and Russian, author-compiler: Zarema Trasinova
2.	Asanchik ve Kashkachik (Asanchik and Kashkachik, Asanchik i Kashkachik, Asanchik and Kashkachik) in Crimean Tatar, Russian, Ukrainian and English, by Rustem Muedin, compiled by Fevzi Rustemovich Muedinov
3.	"Ana kalbi" (Mother's Heart) collection of poems in Crimean Tatar, by Riza Yusufov
4.	A collection of articles and stories in Armenian and Russian, 'Almanac 9' ('Motherland in the Heart')
5.	Collection of articles and stories in Russian by the Crimean Krymchak Society "Krymchahlar" Public Association "Almanac 9"
6.	"Kelejekni oylap: A collection of journalistic articles", in <i>Crimean Tatar and Russian</i>
7.	"Revision Tales of the Crimean Armenians, 1782", in Russian
8.	Sailama Eseler (Selected Works), in Crimean Tatar by Gulzar Dermendzhi

9.	Kuneshchik (Sunshine), in Crimean Tatar by Yunus Qandym
10.	"Evlyatlargya, torunlargya k'aviy miras k'alajak...". ("A worthy heritage for future generations") a collection of poems in the Crimean Tatar language by Alie Veliulaeva
11.	Balalar dunyasi (Children's World) in Crimean Tatar and Russian by Ablyaziz Veliyev, translated by Olga Golubeva
12.	"Eyilikler Olsun" in Crimean Tatar by Sevil Karashayeva, Ayshe Akiyeva
13.	Essays on the History of Crimean Tatar Music Culture (Genesis, Evolution, Modern State), volume 1 in Russian by Zaatov I. A.
14.	The Estonian settlements of Jurči and Kijat Orka" in Russian, by Leongard Salman
15.	Duygularım (My Feelings) in Crimean Tatar, by Bilal Mambet
16.	The Germans of Crimea - Life for Good" in Russian, by I. P. Zadereichuk.
17.	Production of the catalogue "Crimean Tatar Art" (volume 1). Paintings, graphics, sculpture in Russian compilers: Zaatov I. A., Izetov
18.	Terms of Reference for the production of the book Silama Eserler (Selected Works) Volume I - and Volume II in the Crimean Tatar language, by Ablyaziz Veliyev
19.	Syrly, tylsymly dunya (The mysterious magical world), in Crimean Tatar, by Isa Abduraman
20.	"Mayys Yagmury Sepelegende" ("When it Rains in May"), in Crimean Tatar, by Gulnar Ziyadinova
21.	Insanlık Borju (Man's Duty), in Crimean Tatar, by Kadyr Veliyev
22.	Saylama Eseler (Selected Works), in Crimean Tatar, by Dzhevdet Ametov
23.	"Akim Dzhemilev - war hero and dance genius", in Russian, by Sh. Abduramanova
24.	"En'kadirli, suygen yerim" (The dearest favourite place), in Crimean Tatar, by Kerim Jamanakli
25.	"Crimean Tatar cuisine: original recipes", in Crimean Tatar and Russian, by R. Ibadlaev
26.	"My Crimea is a tormented song", in Crimean Tatar and Russian, by Osmanov Dilyaver
27.	"Sary Kunesh" (The Yellow Sun), in Crimean Tatar, by Nadzhie Ametova
28.	"The French of Crimea" in Russian, by Amfiteatrova J. S. C.
29.	"Music of a Stone", in Russian and English by Yakubuk P. G.
30.	"Qisqachlar qayda qışlaylar" and "Tav evchikleri", in Crimean Tatar (reprinted edition), by V. Bianki

31.	"Aglavuk kyzчыk" and "Ormanda yıldızchıklar", by A. Barto (reprinted edition), in Crimean Tatar
32.	"Architecture of the Crimean Armenians" in Russian, by O. Khalpakhchyan, compiled by T. E. Sargsyan.
33.	"Yyrlar jayintygy 1940", (reprinted edition), in Crimean Tatar
34.	"Kyrym Tatar Ornekleri Boyundja Boyalav Defteri" in Crimean Tatar and Russian, by R.I. Vaapov.
35.	"Proverbs, Sayings and Omens of the Crimean Tatars, 1914 in Crimean Tatar and Russian (facsimile edition)
36.	"The Prehistoric Past of the Crimea" in Russian, by G.A. BONCH-OSMOLOVSKY (facsimile edition, 1929).

30 books published in 2020

##	Title
1.	"My mother's image is a guiding star", by S. Medjitova. Medjitova
2.	What Animals Talk About, by A. A. Chergeev
3.	"Lines as the patterns of a rushniki" by N. S. Ryndych
4.	All things can wisdom and years, by A. S. Sklyaruk
5.	"Kyrym Tatar halkynynyn karaman kyzy" (Girl - Hero of the Crimean Tatar people), compiled by U. Edemova
6.	Krymchahlar Almanac, by A.N. Sumina
7.	"Tufanda k'algyan kyoy suryusi" (The storm that seized a flock of sheep), by Yu.Bolat, compiled by V.V. Kachula and N.S. Bekirov
8.	Photo album "The Legend of the 20th Century: Amet-Khan Sultan" by V.M. Basyrov
9.	Ivan Genov: The Fate of the Partisan, co-authored by M. E. Sudnev, I. A. Noskova
10.	"Living Witnesses to Events: The Little Heroes of the Great War" by N.P. Kriklya, co-author
11.	Book Almanac No. 10 "Motherland in the Heart", compiled by: R. K. Pilosyan. K. Pilosyan
12.	The Legends of the Crimea for Children by M. H. Fayzi.
13.	"Sailama eserler" ("Selected works"), author: Cherkez-Ali (Ch.-A. Ametov), compiled by: R. Ametov

14.	"Sailama eserler uch tomlykъ. Birinji vol: novostler" (Selected works in three volumes. Volume one: novels), by Uriye Edemova
15.	"Loyal Daughters of Crimea" (Officers, Partisans, Underground Women) by L. Khalilova
16.	"Crimean Tatar women in the Great Patriotic War" Vol. 4, by A. Veliyev in Crimean Tatar and Russian
17.	Tebessum ile yasha (Live with a Smile) Book Musical collection, by S. S. Kakura
18.	"Istek. (Desire) Poems, Memoirs, by: Dermendji L.
19.	"Crimean Tatar-Russian Dictionary (1916)" by Bilâl Terlekçi [Qırımtatarca-rusça luğat (1916)] [Bilâl Terlekçi], Special editor, foreword author: I.A. Kerimov, Editor: T.N. Kirimov, compiler: H.B. Terlekçi
20.	"Sailama eserler alty tomlykъ". Birinji vol: shiirler ve novostler (Selected Works in Six Volumes. Volume One: Poems and Stories), by Sh. Alyadin compiled by Alyadinova L.
21.	HISTORY OF THE NATIONAL ORGANIZATIONS OF CRIMEA, by B. S. Balayan
22.	"The Folklore Heritage of the Thracian Greeks of the Republic of Crimea", co-authors: Kifnidi S. A., Lazaridi S. A., Banach L. S.
23.	"Between Crimea and Paris", by: Kenzhikaeva U.
24.	"Crimean Tatar music by professional composers" by F. M. Aliyev.
25.	"Uchurym bashynda (Above the precipice)", by: Mambetova M.
26.	"Alem-i teselli (Graceful Peace)", by Voloshin M. (Translated into Crimean Tatar by Yunus Qandym)
27.	"Sailama eserler (Selected works)", by Murad R., compiled by Mambetova M.
28.	Military and patriotic album "There was a war..." by Olkhovskaya V. Ya. Я.
29.	"Menim Yollarym" (The Road Acquired) by Emin S. compiled by Ilyasov D., Khurshutov A., Osmanov D.
30.	"The contribution of the repressed peoples of the USSR to the victory in the Great Patriotic War of 1941-1945", compiled by: Akieva S.I., Kurtseitov R. J.

31 books published in 2021

##	Title
1.	"Agathangel of Crimea - Son of Three Nations", by E. Belousov

2.	"Kyrym bizim er sheyimiz", by R. Gafarov. Gafarov
3.	Unusual inhabitants of the Crimea, by V. Olkhovskaya
4.	"Duwan S. Memories", co-editor-compiler: V. Strunina
5.	The Complete Works. Literary Works. Volume 1, by I. Gasprinsky, compiled by S. Seitmemetova, G. Seitvaniyeva
6.	"Hayatny bakhshyshlary", by G. Useinova
7.	Facsimile edition of "Izergil k'arty" (The Old Woman Izergil), by A. M. Gorky
8.	Facsimile edition of Robinson Crusoe, by D. Defoe
9.	Facsimile edition of Menim Aivanlarym, by V. Durov
10.	Almanac No. 11 "Motherland in the Heart", compiled by: R. Pilosyan Pilosian
11.	"Tylsimli masallar", by R. Suleymanov.
12.	"Gonyul Ilhamy ve Emirinen", by A. Kokieva
13.	"A Quiet Place on the Colon of Vicinity. Vibrant creations. Bakiyilik avuchyndaki chehek. Saylama eserler", by L. Ukrainka, translated into Crimean Tatar by Y. Kandym, compiled by V. Basyrov
14.	On the Road, by O. Gabrielyan
15.	"Edebiyatshynaslyk ve medeniy ayat", by S. Yunusov
16.	"Karaites - the last inhabitants of Mangup", Compilation Editors: V. A. Eliashevich, I. S. Lipunov, M. B.Kizilov
17.	"Righteous among the Nations of the World in the Republic of Crimea", compiled by: A. Gendin
18.	Mummy's Fairy Tales, by A. Em (M. Heydiūnas)
19.	Album "Artist Mamut Churlu", by M. Churlu
20.	The Legacy of the Ancestors, by I. Abdullayev, compiled by E. Seitbekirov
21.	"Hayallarym merjan kibi" by D. Medjitova, compiled by S. Medjitova
22.	"The Burnt Villages of Crimea during the Great Patriotic War, 1941-1944" by K. Ametov. K. Bokova
23.	"The Link of Times", by P. Kesmeji, compiled by: S. Yurieva (Kesmedji)
24.	"From Ararat to Ai-Petri" by G. Khachatryan
25.	Ebedilik (Eternity), by I. Abduraman

26.	"Yuri Bekirovich Osmanov. A man from another dimension", compiled by A. O. Dobro
27.	"Sailama eserler alty tomlykъ" Ekinji vol. Novestler (Selected Works in Six Volumes. Volume Two. Novels), by Sh. Alyadin, compiled by L. Alyadinova
28.	"I wasn't a guest on earth... Interviews. Memories. List of publications. Volume 1" by V. Basyrov
29.	"Catalogue-album: Akhtem Aliyev - artist and poet", by A. Aliyev, compiled by R. Aliyev
30.	"Crimea 1941-1944. The Reverse Side of the War. Selected aspects of the history of the occupation of the Crimea. Volume 2", by A. Nemenko
31.	Facsimile edition of "Ikyaye Etuv Ichun Makiyaler Jyntygy" by P. O. Afanasyev, I. N. Shaposhnikov, E. E. Solovyova. O. Afanasyev, I. N. Shaposhnikov, E. E. Solovyova

27 books published in 2022

##	Title
1.	"I Love Crimea in All Weathers. Volume 1", by: Djerbinova L.
2.	"Children's Galaxy, by Amedov N.
3.	"Yureklerni tepretken edebiyu kyrym tatar edibiyati akkend maqaleler (Literary world, stirring hearts. Articles on Crimean Tatar literature)", by: A. Dzhemileva.
4.	"Vatan tarta bagirina (I am striving to embrace the Fatherland), by Kafadar E., compiled by Kafadar R.
5.	"Saylama eserler. Uch tomlykъ. Ekindzhi tom. Novel", by: Edemova U.
6.	"Adiy insan olsa da (Even if a simple man)", by: Veliyev (Veli) K.
7.	"Saylama eserler. Alty tomlykъ. Uchunji tom. Narrative, ikyaeler", author: Alyadin Sh. compiled by Alyadinova L.
8.	"Saylama eserler", by Selim Sh. compiled by Jelilova L.
9.	"Tilimiznin degerligi (Wealth of Language)", by E. Bekirov.
10.	"Atalar sösleri ve aytymlar (Proverbs and sayings)", author: Asanov S., compiled by Asanov A.
11.	"Selime Chelebiyeva. Ayyrylamam sanadan. (I will not part with the scene)", compiled by: Jemileva
12.	Facsimile edition. "Songs of the Crimean Turks", by A. Olesnitsky.
13.	Facsimile edition. "Dubrovsky", by Pushkin A.

14.	Facsimile edition. "Ikjaeler (stories)", by Chekhov A.
15.	"Ha-ha-ha", by: Veliyev A.
16.	"Memories of Peter Aljanaka", by the author-compiler: Jan T.
17.	"The Khan's Palace in Bakhchisaray", by V. Gergross.
18.	Crimea. Prosperity in unity.
19.	"Almanac No. 12. Homeland at Heart", co-editor-compiler: R. Pilosyan.
20.	"...(Collected Essays)", by Petrosian M.
21.	"Alexander Mikhalyants. Jewellery Art. Enamel. Sculpture. Painting. Photo", author: Mikhalyants A.
22.	"Poems and songs", by: Klossowski I.
23.	Greeks. Crimean Hellas. Authors-composers: Schonus I.A., Pipia O.M., Laptev Y.N., Gabrielyan A.O., Budurova N.V.
24.	"The shtetl mystery of Elena Kotlyar", by: Kotlyar E.
25.	"URANOIS (Heaven)", by I. Borokhov.
26.	"Ashik Garip. A Krymchak tale", by Reby D., compiled by Zengina N.
27.	"Durante (Persistent)", by Petrov A. (Krymsky A.)

L. Khalilova, FAITHFUL DAUGHTERS OF CRIMEA: OFFICERS, PARTISANS, UNDERGROUND WOMEN (Mediacentre n.a. I. Gasprinsky, 2020).

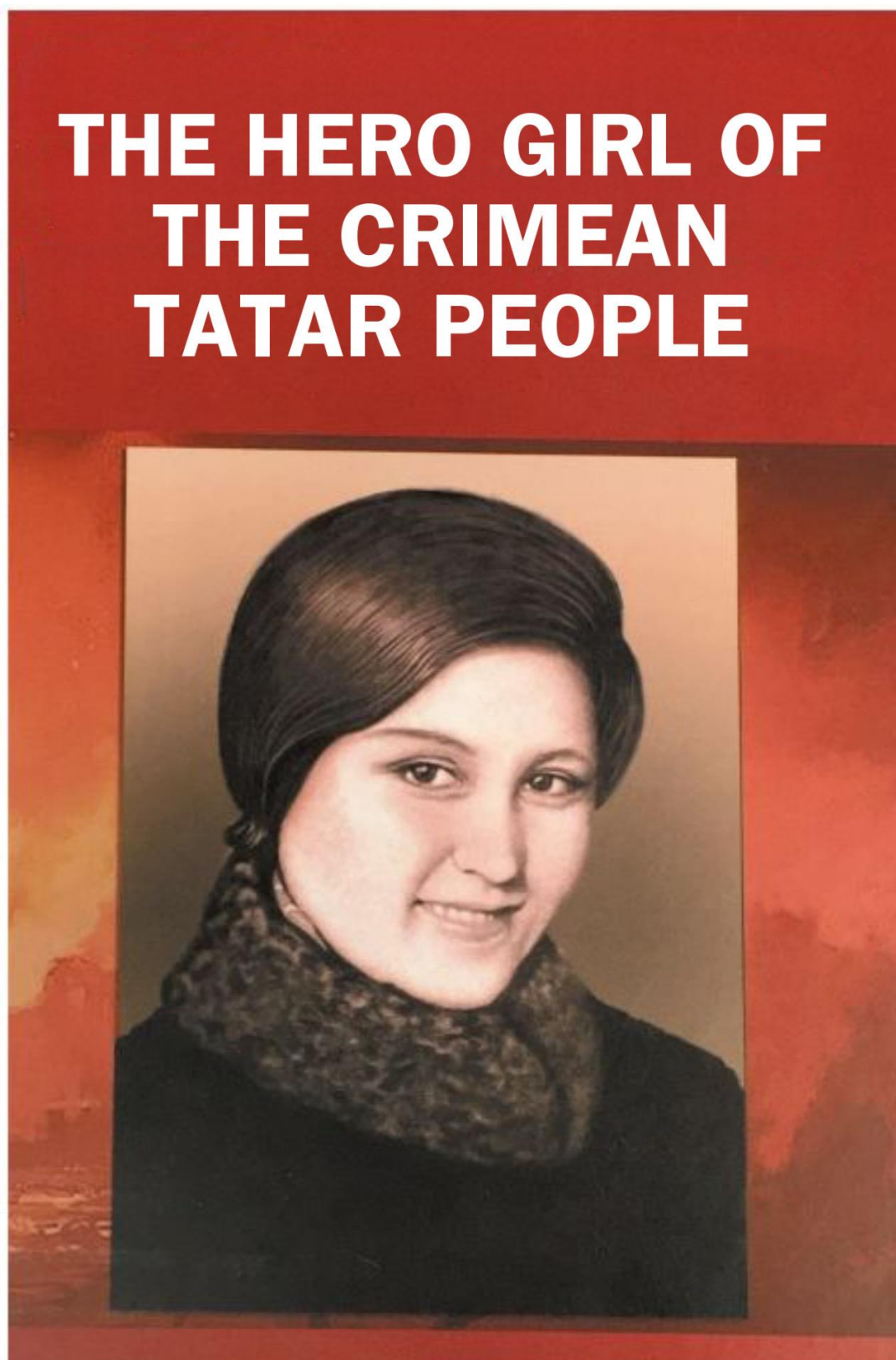
FAITHFUL DAUGHTERS OF CRIMEA

OFFICERS, PARTISANS, UNDERGROUND WOMEN



Exhibit F

U. Edemova, THE HERO GIRL OF THE CRIMEAN TATAR PEOPLE (Mediacentre n.a. Gasprinsky, 2020).



UDC 821.512.19-94

BBC 84 (2Ros)

K 977

Approved by the Advisory Council on the Publication of Socially Important Literature in Native Languages at the State Autonomous Institution of the Republic of Crimea Mediacentre n.a. Ismail Gasprinskiy. Published with the support of the State Committee on Interethnic Relations of the Republic of Crimea at the expense of the federal budget, the budget of the Republic of Crimea, is not subject to commercial distribution

K 977 The Hero Girl of the Crimean Tatar People: collected book / compiler U. Edemova - Simferopol: State Autonomous Institution of the Republic of Crimea "Mediacentre n.a. Gasprinsky", 2020. — 504 p. : illust. — In Crimean Tatar and Russian languages.

UDC 821.512.19-94

ISBN 978-5-6044686-1-6

BBC 84 (2Ros)

The book "The Hero Girl of the Crimean Tatar People" is an extensive collection of fiction and documentary works dedicated to the difficult fate and heroic deed of Alime Abdenanova. The name of the legendary hero girl, a Soviet servicewoman of Crimean Tatar origin and a resident of the intelligence department of the Primorskaya Army Headquarter during the Second World War, will live forever in the memory of generations.

© U. Edemova, compiler, 2020

ISBN 978-5-6044686-1-6

© SAI "Mediacentre n.a. Gasprinsky", 2020

[...]

Exhibit G

S. Akieva, R. Kurtseitov, CONTRIBUTION OF THE REPRESSED PEOPLES OF THE USSR TO VICTORY IN THE GREAT PATRIOTIC WAR OF 1941-1945, VOLUME II. CRIMEAN TATARS, BULGARIANS, GREEKS AND ARMENIANS OF CRIMEA MESKHETIAN (AHISKA) TURKS (Mediacentre n.a. Gasprinsky).



*Crimean Tatars
Bulgarians, Greeks and Armenians of
Crimea
Meskhetian (Ahiska) Turks*

**CONTRIBUTION
OF THE REPRESSED PEOPLES OF THE USSR
TO VICTORY
IN THE GREAT PATRIOTIC WAR
1941-1945.**

VOLUME II

Annex 38

Council of Ministers of the Republic of Crimea, Letter No. 1/01-46/8775/3/3/214, 14 February
2023

(translation)

Translation**Mediacentre n.a. Ismail Gasprinsky, Letter, 2 March 2023.**

State Committee on Inter-
Ethnic Relations of the
Republic of Crimea (in
Ukrainian)

State Committee on Inter-
Ethnic Relations of the
Republic of Crimea (in
Russian)

State Committee on Inter-
Ethnic Relations of the
Republic of Crimea (in
Crimean Tatar)

**State Autonomous Institution of the Republic of Crimea Mediacentre n.a. Ismail
Gasprinskiy (in Russian)**

**State Autonomous Institution of the Republic of Crimea Mediacentre n.a. Ismail
Gasprinskiy (in Ukrainian)**

**State Autonomous Institution of the Republic of Crimea Mediacentre n.a. Ismail
Gasprinskiy (in Crimean Tatar)**

Trubachenko Str., 23a, Simferopol, Republic of Crimea, 295048, 8(918) 024-46-24, E-mail:
info@mediacentr.org.ru
TIN 9102192812, KPP 910201001, Reg. No. 1159102113455

**To the Ministry of Foreign Affairs
of the Russian Federation
Russian Federation, 119002,
Moscow, 32/34 Smolensky Blvd.**

**To Monastyrsky, Zyuba, Stepanov
& Partners
Russian Federation, 121099,
Moscow, 3 Novinsky Blvd., bld. 1**

**To Partner, Attorney at law
K.N. Udovichenko**

2 March 2023

Dear Attorneys at law!

**In response to your request for information about the work of Mediacentre n.a. Ismail
Gasprinskiy we inform on the following**

The State Autonomous Institution of the Republic of Crimea Mediacentre n.a. Ismail Gasprinskiy (hereinafter, "Mediacentre") considered the request for information dated 24 February 2023, sent by Monastyrsky, Zyuba, Stepanov & Partners, acting on behalf of the Ministry of Foreign Affairs of the Russian Federation.

Below we provide you with answers to the questions contained in the request concerning the work of the Mediacentre with printed publications in various languages of peoples living in Crimea, for their use in the preparation of the written position of the Russian Federation in the dispute initiated by Ukraine against the Russian Federation before the International Court of Justice.

On the setting up and objectives of the Media Center

The Mediacentre was set up in 2015 as part of the state programme for the ethno-cultural development of nationalities living in Russia. It is named after Ismail Gasprinskiy, a famous Crimean Tatar activist, who worked hard throughout his life to produce various newspapers and magazines, carried out educational activities with purpose to promote the Crimean Tatar language and to preserve and develop cultural diversity. Media Center has a similar aim – to support the production of media and literature in the languages of all peoples, ethnic groups, and national minorities, thus contributing to the preservation of languages, culture and traditions.

In the past seven years alone, we have published more than 220 books in the languages of the peoples living in Crimea: Crimean Tatar, Armenian, Ukrainian, Greek, Hebrew, German, Italian, Bulgarian and others.

Since our creation, we have continued to develop: every year the number of print media published at the expense of state subsidies increases, and all of them actively popularize the culture and literature of the Crimean peoples. Since 2019 we have a small printing house of our own. It is noteworthy that before 2014 there were very few such opportunities in Crimea.

The Media Center has three main areas of activity:

- support of 15 mass media, including in Russian, Crimean Tatar, Ukrainian, Armenian, German, Bulgarian and Greek languages;
- publication of books on the culture of the peoples of Crimea, including in Russian, Crimean Tatar, Ukrainian, Armenian, Bulgarian and Krymchak languages;
- organisation of events: conferences, presentations, round tables, etc.

Support of mass media operations

We support a range of mass media, most of which target specific ethnic groups in Crimea. At the moment, the Mediacentre n.a. I. Gasprinskiy has 15 different newspapers and magazines. Many of the publications have a very rich history and it is therefore important to support them.

A special place in the Media Center is given to Crimean Tatar periodicals. In particular, the Mediacentre publishes under its aegis:

- the weekly newspaper «Yan’i Dunya» (“New World”) – a publication with a unique history. It was first published in 1918 and changed within the development of the Crimean Tatar language. Its circulation is 1,000 copies.
- the magazine “Yildiz” (“The Star”) can be called a unique monument to the Crimean Tatar literary language. It was created during the years of the deportation of Crimean Tatars, and prominent Crimean Tatar writers and poets have published in it. Its circulation is 500 copies.
- the magazine “Arzy” is dedicated to the role of Crimean Tatar women in history and literature. It was created recently, but continues the tradition established back in 1906 by Ismail Gasprinskiy’s daughter, Shefika, leader of the Muslim women’s movement. Its circulation is 200 copies.
- the newspaper “Meraba” (“Hello”) is a relatively new publication (it was created in 2015) that on a weekly basis publishes information about the latest developments not

only in the lives of Crimean Tatars but also of other peoples of Crimea. Its staff also takes part in radio and TV programmes where they discuss current news. Its circulation is 1,000 copies.

- the magazine for teachers of the Crimean Tatar language «Ana tili odzhalaryna» provides methodological and didactic support for the teaching process and also gives advice on how to preserve the mother language in families. Its circulation is 500 copies.

The newspaper “Yan’i Dunya” was shortlisted (10 best projects) and placed 6th at the All-Russian Public Award for Preservation of Linguistic Diversity of the Russian Federation “Key word”, in the nomination “For Contribution to Preservation of Mother Language”. In 2022, 232 applications from 61 regions of the Russian Federation and from Belarus were received for this competition.

We also attach great importance to preserving the languages and cultures of other peoples of Crimea.

To support the functioning of the Ukrainian language, the newspaper “Krymsky Visnyk” (“Crimean Herald”) publishes both ethnographic essays and articles on topical issues. Its circulation is 500 copies.

The Mediacentre also publishes media aimed at other peoples: for example, the newspaper “Hoffnung” (“Hope”) is intended for Crimean Germans, who participate directly in its production (its circulation is 500 copies); the magazine “Dove of Masis”, which was founded as far back as 1855 and is publishing periodically for almost 30 years, tells about the history, culture and famous personalities of Crimean Armenians (its circulation is 500 copies); the Bulgarian newspaper “Izvor” (its circulation is 500 copies) are published for Crimean Bulgarians, and the newspaper “Tavrik” is for Greeks.

It is up to the staff of the publications to decide on the content, and it is important to us that the newspapers and magazines involve people from specific cultures.

We consider it important to create and support mass media that could be of interest to Crimeans from different ethnic backgrounds. For example, the magazine “Crimea” publishes literary works in Crimean Tatar, Ukrainian and Russian. The cultural and educational magazine “Our Crimea”, which was founded in 2016, tells both about the culture of Crimea in general (architecture, theatre, traditions of the people, iconic figures) and about activities and events of separate national-cultural formations, and a certain part of each issue is devoted to one of the peoples of Crimea. And our new project – youth magazine “We! Youth magazine Crimea” – has no “nationality” at all. Its target audience is all Crimean youth. It publishes materials in the 3 national languages.

All mass media that were registered on the peninsula before 2014 and expressed a desire to re-register were able to do so after submitting the relevant application without any bureaucratic delays and within the time limits stipulated by Russian law.

Publication of socially significant literature

We believe that the foundation for preserving both the functionality of language and culture is books, so the Mediacentre also publishes socially significant literature. A particularly important area

is the publication of books in native languages.¹ To control the quality of published literature, the Mediacentre has an Advisory Council for publishing socially significant literature in native languages that includes writers, teachers, academics and journalists, including those of Crimean Tatar, Ukrainian, Armenian and Greek origin.² The Advisory Council meets at least once a year to review manuscripts whose authors or compilers have applied for inclusion on the list for publication at the expense of the state budget.

In the seven years of its existence, more than 220 books in Crimean Tatar, Ukrainian, Bulgarian, Armenian, Hebrew, Krymchak, and Russian have been published, as well as books about the culture of other nationalities: Karaites, French, Estonians, Greeks.³ The publication of literature and printed mass media in the languages of the peoples of Crimea is financed both from the federal budget (Federal Agency for Nationalities) and from the budget of the Republic of Crimea.

In accordance with Federal Law No. 77-FZ dated 23 November 1994 “On Mandatory Copies of Documents”, part of the circulation of publications published with the assistance of the Mediacentre is distributed free of charge to libraries, including outside Crimea. In particular, the Media Center sends:

- to the federal executive branch in the area of the press, mass media and mass communications one obligatory copy of all types of printed publications;
- to the Russian State Library mandatory copies of all types of printed publications for subsequent distribution to the largest libraries and information institutions (from 3 to 16 copies);
- to the Russian State Library, within seven days from the date of publication of the first batch of printed publications using information and telecommunications networks two mandatory copies of the printed publications in electronic form, certified by a qualified electronic signature;
- to the State Budgetary Institution of Culture of the Republic of Crimea «Crimean Republican Universal Scientific Library named after I.Y. Franko» three mandatory copies of all types of printed publications.

Also, in accordance with the Law of the Republic of Crimea “On Mandatory Copies of Documents” dated 22 March 2017 No. 368-ZRK/2017 the Mediacentre sends three mandatory copies of all types of printed publications to the State Budgetary Institution of Culture of the Republic of Crimea “Republican Crimean Tatar Library n.a. I. Gasprinskiy” if the publication is done in Crimean Tatar language or concerns Crimean Tatars.

¹ See, for example, Y. Bolat, A FLOCK OF SHEEP CAUGHT IN A STORM. TRANSLATION FROM THE CRIMEAN TATAR INTO RUSSIAN, UKRAINIAN, ARMENIAN (Mediacentre n.a. I. Gasprinsky, 2020) (Exhibit A); L. Ukrainka, A FLOWER IN THE PALM OF ETERNITY. SELECTED WORKS (Mediacentre n.a. I. Gasprinsky, 2021) (Exhibit B).

² See Mediacentre n.a. I. Gasprinsky, Membership Composition of the Advisory Council on the publication of socially important literature in native languages at the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky” (Exhibit C).

³ See Mediacentre n.a. I. Gasprinsky, List of books published by the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky” (Exhibit D).

Multiple copies of the books are sent to the Ministry of Culture of the Republic of Crimea and distributed throughout the library network of the whole peninsula.

According to their content and focus, the publications are donated to national-cultural autonomies and other public organizations of the Republic, many of which have established their own libraries based on the books, albums and almanacs published by the Media Center.

The Mediacentre prides itself on books that glorify the exploits of the multinational people of Crimea during the Great Patriotic War. For example, under aegis of the Media Center were published the book “Loyal Daughters of Crimea. Officers, Partisans, Underground Women” describing the valor and contribution to the victory of Crimean Tatars in the war years,⁴ a photo album for the 100th anniversary of Amet-Khan Sultan, twice Hero of the Soviet Union, “Kyrymnin Sadyk Kyzy” about the exploits of Hero of Russia Alime Abdennanova.⁵ The Mediacentre also supported the publication of the multi-volume book “Contribution of the Repressed Peoples of the USSR to the Victory in the Great Patriotic War of 1941-194”» and the multi-volume book “Reverse side of the war” dedicated to the exploits of Crimean Tatars among others.⁶

In addition, the Mediacentre is publishing facsimile editions of the rarest books that exist in Crimean libraries in a single copy.

The Mediacentre’s website works active, with the most current news from the national-cultural associations of Crimea and PDFs of all newspapers and magazines published by Media Center. There you can also find books published during all the years of the organization's existence.

Organisation of events, educational activities

We also see our aim as promoting and developing the culture of Crimea and its nationalities, and so we regularly hold conferences, round tables and meetings on various subjects, celebrate memorable dates in the history of Crimea and, of course, organise presentations of our new books. In all, we have organised and participated in 28 events in 2022, including:

- Cheronopolye Village, Belogorsk District, Greek holiday “Panair”;
- Chutuf-Kale Fortress, Bakhchisaray District, Crimean Karaites’ Cultural Days;
- Simferopol, Republican Crimean Tatar Library n.a. I. Gasprinsky, Library Forum “Crimean Tatar Book”;
- Simferopol, International Round Table “Development of Links between Crimean Ukrainians and their Compatriots Abroad”;
- Simferopol, Crimean Tatar State Academic Musical and Drama Theatre, Khydyrlez national holiday;

⁴ L. Khalilova, FAITHFUL DAUGHTERS OF CRIMEA: OFFICERS, PARTISANS, UNDERGROUND WOMEN (Mediacentre n.a. I. Gasprinsky, 2020) (Exhibit E).

⁵ U. Edemova, THE HERO GIRL OF THE CRIMEAN TATAR PEOPLE (Mediacentre n.a. Gasprinsky, 2020) (Exhibit F).

⁶ S. Akieva, R. Kurtseitov, CONTRIBUTION OF THE REPRESSED PEOPLES OF THE USSR TO VICTORY IN THE GREAT PATRIOTIC WAR OF 1941-1945, VOLUME II. CRIMEAN TATARS, BULGARIANS, GREEKS AND ARMENIANS OF CRIMEA MESKHETIAN (AHISKA) TURKS (Mediacentre n.a. I. Gasprinsky) (Exhibit G).

- Peschanoye Village, Bakhchisaray District, interethnic youth forum;
- Bakhchisaray, Central Library n.a. A.S. Pushkin, historical excursus “In the Unity of the Peoples of Crimea”;
- Simferopol, meeting of the Public Council for Harmonisation of Interethnic Relations;
- Simferopol, Republican Crimean Tatar Library n.a. I. Gasprinsky, literary readings “The World of Ismail Gasprinsky”;
- Simferopol, Republican Crimean Tatar Library n.a. I. Gasprinsky, International Book Giving Day, “Give Books with Love” event;
- Simferopol, mourning events dedicated to the Day of Remembrance for victims of the deportation from Crimea;
- Simferopol, Gagarin Park, Crimean Tatar Flag Day;
- Simferopol, Beloye-5, participation in the celebration of “Eid al-Fitr”;
- Simferopol, Beloye-5, Crimean Tatar national holidays “Derviza”;
- Kerch, V.G. Belinsky Central City Library, library forum “Crimean Tatar Book”;
- Feodosiya, festival of Crimean Tatar culture “Kefe Gulleri”;
- Simferopol, Crimean Tatar Academic Music and Drama Theatre, festival of Crimean Tatar culture “Qirim Naghmeleri”;
- Simferopol, Republican Crimean Tatar Library n.a. I. Gasprinsky, Crimean Tatar Writing and Culture Day;
- Simferopol, International Round Table “Development of links between Crimean Tatars and their compatriots abroad”.

We already have 24 events planned for 2023, and the number is growing.

We also help to develop national journalism in Crimea – we regularly host internships for journalism students who learn how to work in a creative multicultural environment, also we organise seminars, forums and workshops for young aspiring journalists.

2 March 2023

[SIGNATURE] Vagan Vazgenovich Vermishyan,
Head of State Autonomous Institution of
the Republic of Crimea Mediacentre n.a.
Gasprinsky

LIST OF EXHIBITS:

Number:	Name:
Exhibit A	Y. Bolat, A FLOCK OF SHEEP CAUGHT IN A STORM. TRANSLATION FROM THE CRIMEAN TATAR INTO RUSSIAN, UKRAINIAN, ARMENIAN (Mediacentre n.a. I. Gasprinsky, 2020).
Exhibit B	L. Ukrainka, A FLOWER IN THE PALM OF ETERNITY. SELECTED WORKS (Mediacentre n.a. I. Gasprinsky, 2021).
Exhibit C	Mediacentre n.a. I. Gasprinsky, Membership Composition of the Advisory Council on the publication of socially important literature in native languages at the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”.
Exhibit D	Mediacentre n.a. I. Gasprinsky, List of books published by the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”.
Exhibit E	L. Khalilova, FAITHFUL DAUGHTERS OF CRIMEA: OFFICERS, PARTISANS, UNDERGROUND WOMEN (Mediacentre n.a. I. Gasprinsky, 2020).
Exhibit F	U. Edemova, THE HERO GIRL OF THE CRIMEAN TATAR PEOPLE (Mediacentre n.a. Gasprinsky, 2020).
Exhibit G	S. Akieva, R. Kurtseitov, CONTRIBUTION OF THE REPRESSED PEOPLES OF THE USSR TO VICTORY IN THE GREAT PATRIOTIC WAR OF 1941-1945, VOLUME II. CRIMEAN TATARS, BULGARIANS, GREEKS AND ARMENIANS OF CRIMEA MESKHETIAN (AHISKA) TURKS (Mediacentre n.a. I. Gasprinsky).

Y. Bolat, A FLOCK OF SHEEP CAUGHT IN A STORM. TRANSLATION FROM CRIMEAN TATAR TO RUSSIAN, UKRAINIAN, ARMENIAN (Mediacentre n.a. I. Gasprinsky, 2020).

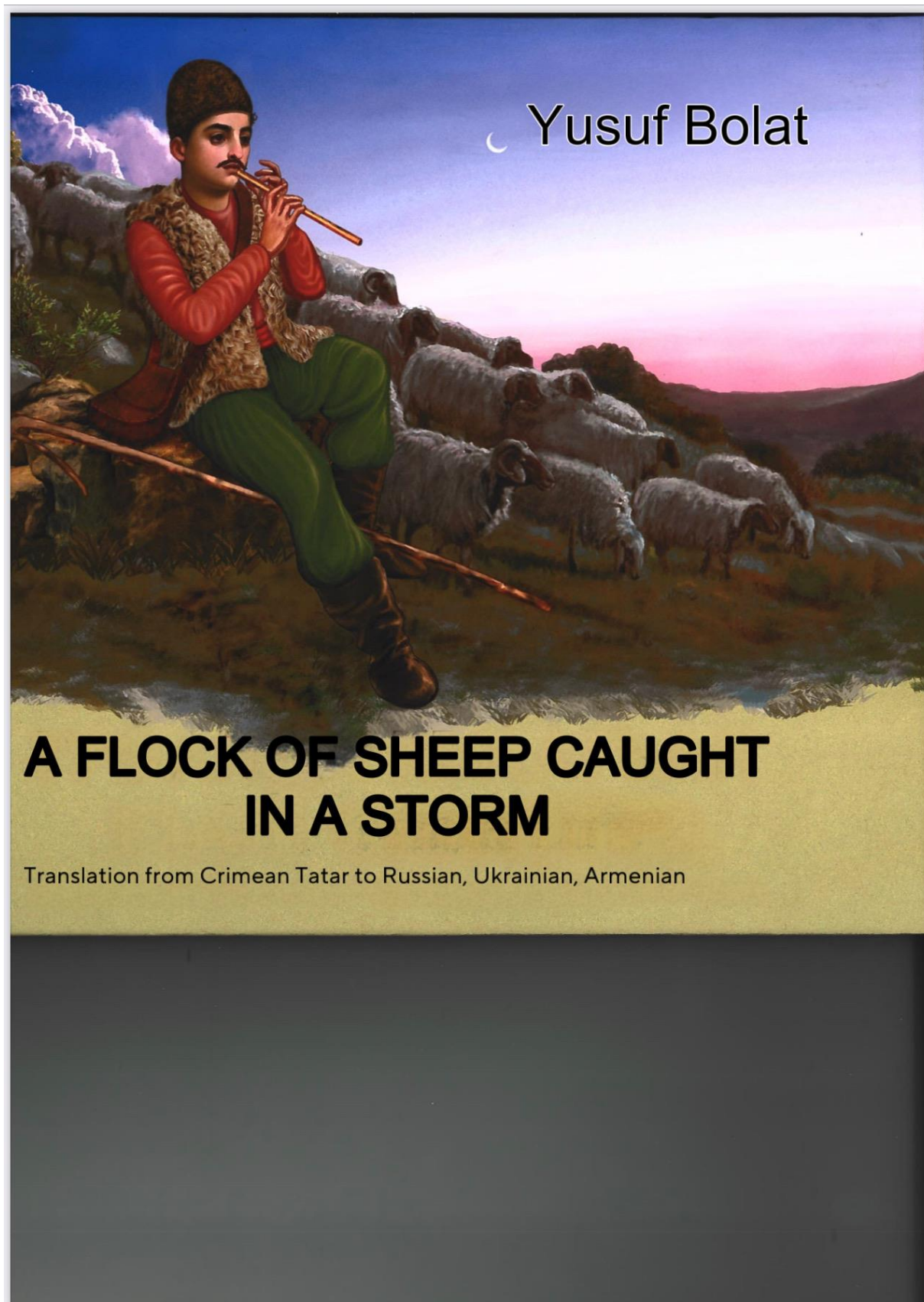


Exhibit B

L. Ukrainka, A FLOWER IN THE PALM OF ETERNITY. SELECTED WORKS (Mediacentre n.a. I. Gasprinsky, 2021).



Lesya Ukrainka
A Flower in the Palm of Eternity

UDC 821.161.2
BBK 84(Ukr)
U 45

Published by the Ismail Gasprinsky Media Centre state-funded autonomous institution of the Republic of Crimea with the support of the State Committee for Interethnic Relations of the Republic of Crimea on funds from the federal budget and from the budget of the Republic of Crimea. Approved by the Advisory Council on publication of socially important literature in native languages under the Ismail Gasprinsky Media Centre state-funded autonomous institution of the Republic of Crimea.

Not for commercial distribution

Lesya Ukrainka

A Flower in the Palm of Eternity. Selected works. Simferopol, I. Gasprinsky Media Centre state-funded autonomous institution of the Republic of Crimea, 2021, 168 pages, In Ukrainian and Crimean Tatar languages.

ISBN 978-5-6046689-2-4

The artistic legacy of Lesya Ukrainka is fertile soil for researchers of the phenomenon of literary space and time. Translation is also a path to the Poet. There is always a small miracle of turning "the indifference of a dictionary" indifference" into a trembling vibration of the strings of one's soul.

UDC 821.161.2 BBK84(Ukr)

ISBN 978 5-6046689-2-4

© Lesya Ukrainka, author, 2021

© Basyrov, V., compiler, 2021

© Kandymov, Yu., translation from Ukrainian into Crimean Tatar, 2012

© I. Gasprinsky Media Centre state-funded autonomous institution of the Republic of Crimea, 2021,



СХІДНА МЕЛОДІЯ

Гори багрянцем кривавим спалахнули,
З промінням сонця західним прощаючись, —
Так моє сонце жалем загорілося,
З милим, коханим моїм розлучаючись.

Геть понад морем, над хвилями синіми
В'ються, не спиняється чаєчки білії.
Де тебе мають шукати не безвісті,
Милій мій, думи мої бистрокрилії?

В себе на вежі вогонь запалила я,
Любий, твого воріття дожидаючись,
Хай він просвітить по морю доріженьку,
Щоб не зблудив ти, з чужини вертаючись.

Світле мій! буду тебе дождатися,
В чорну, смутну фереджію* повітатя,
І посаджу кипарисову гілочку,
Буде щодня вона слівими политая.

А як повернешся, я покажу тобі
Той кипарис мій в садочку квітчастому,
Здійметься він над всіма мінаретами
В краї сьому, на мечеті багатому.

Ялта, 27.01.1897 р.

* Фереджія — покривало магометанок.

ШАРКЪ НАГЪМЕСИ

Дагълар кийди къан къырмызы либасыны
Ведлашып ал кунешнинъ шавлассинен.
Тыпкъы шойле, гъамдан янды юречигим,
Айрылгъанда джандан азиз севгиминнен.

Узакъ денгиз, мавы далгъа узеринде
Авелене, учушалаар чагъалаалар.
Сени къайда, бельгисиз бир ерлердеми
Аккъанатавы ойлаарым, айт, арасыналар?

Севгимим, сенинъ къайтып кельменгъни беклеп,
Агеш якътым ичимдеки къулалелерде.
Гъурбет ильден къайткъанда ёл джоймасын, деп,
Айдынаатсын ёлныгъынгъны денгизлерде.

Эфкъары ве сим-сия бир фереджеге
Сарылып, мен сени, нурым, беклейджегим.
Отуртаджагъым къара сельби фиданнынъ,
Эр хунъ онгъа козьяшларым тедкеджегим.

Къайтып кельсенъ сангъа оны косьтереджегим,
Гульбагъчамда осер къара сельбичигим.
Юкселир о джамилерге зенгин диярда
Минарелер узере къара сельбичигим.

Ялта, 27.01.1897 с.

A literary/artistic publication

Lesya Ukrainka
A FLOWER IN THE PALM OF ETERNITY

Selected Works

Compiled by V.M. Basyrov

Translated from Ukrainian into Crimean Tatar by Y.U. Kandymov

Preface by Doctor of Philology, professor, senior research fellow of the Fevzi Yakubov Research Institute for Crimean Tatar Philology, History and Culture of the Ethnic Groups of the Crimea V.I. Gumenyuk

Ukrainian texts edited by N.Y. Seitvelieva

Crimean Tatar texts edited by: N I. Bekirov, E R. Ajalimova

Artist: R I. Vaapov

Crimean Tatar text proofread by S.S. Sitzhalilova

Computer layout by E R. Ajalimov

Signed to print: 02 August 2021. Format: 70x100 1/16.

Offset printing. Font: BannikovaC. Conventional printed sheet: 13.65.

Quantity: 10.5 conventional printed sheets. Circulation 300 copies. Order No. 21 -14795.

I. Gasprinsky Media Centre state-funded autonomous institution of the Republic of Crimea
23-a Trubachenko Street, Simferopol, 295048, Republic of Crimea

E-mail: mediacenter2015@mail.ru | OGRN 1159102113455

Printed by CONSTANT LLC printing house

1/12 Berezovaya Street, Severny, 308519, Belgorod region

Phone/Fax +7 (4722) 300-720, www.konstanta-print.ru

Exhibit C

Mediacentre n.a. I. Gasprinsky, Membership Composition of the Advisory Council on the publication of socially important literature in native languages at the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”.

Membership Composition of the Advisory Council on the publication of socially important literature in native languages at the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”

Chairman:	
VERMISHYAN Vagan Vazgenovich	Director of the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”
Deputy chairman:	
IBRAGIMOVA Adile Aidynovna	Deputy Director for editorial and publishing activities of the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”
Secretary:	
VESELOV Andrey Viktorovich	executive secretary of the publishing department of the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”
Council members:	
YAKUBOV Ruslan Rishatovich	First Deputy Chairman of the State Committee for Interethnic Relations of the Republic of Crimea;
GLUSHCHENKO Elizaveta Alexeyevna	Deputy Minister of Internal Policy, Information and Communications of the Republic of Crimea;
PATRUSHEV Sergei Anatolievich	Head of the Department of Museums, Libraries and Culture Education of the Ministry of Culture of the Republic of Crimea;
OSMANOV Dlyaver Kazimovich	Head of the Department of Interethnic Relations and Socio-Cultural Adaptation of Migrants;
JAGYAEVA Gulnara Sabrievna	Director of the state budgetary institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”;
SELENDILY Lemara Sergeevna	Doctor of Philology, Professor of the Department of Crimean Tatar Philology at the Institute of Philology of the Vernadsky KFU, Secretary and Coordinator of the Council of Crimean Tatars under the auspices of the Head of the Republic of Crimea;
LAPTEV Yuri Nikolayevich	Director of the State Budgetary Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”;
RICKMAN Grigory Mihailovich	Member of the All-Russian Public Organization "Union of Journalists of Russia", PhD in Biology, Chairman of the Board of the Local National and Cultural Autonomy Public Organization “Mediacentre n.a. I. Gasprinsky”;

GANIEVA Emine Suleymanovna	PhD. in Philology, Associate Professor, Dean of the Faculty of History, Arts, Crimean Tatar Language and Literature
BASYROV Valery Magafurovich	Chairman of the Board of the Public Organisation “Union of Writers of the Republic of Crimea”, Director of the Limited Liability Company “Izdatelstvo Dolya”
EDEMOVA Urie	Crimean Tatar writer, novelist
VELIEV Ablyaziz	Head of the Laboratory of the Research and Development Institute of Crimean Tatar Philology, History and Culture of Ethnic Groups of the State Budget Educational Institution of the Republic of Crimea “Fevzy Yakubov KIPU”;
GRIDCHINA Anastasia Sergeevna	Chairman of the Council of the Regional Public Organisation "Ukrainian Community of Crimea";
OSMANOV Dlyaver Ibraimovich	Editor-in-chief of the literary magazine Yildiz;
SULEIMANOV Seyran Akbaraliyevich	poet, novelist, editor-in-chief of the newspaper Yan’y Dunya;
SHONUS Ivan Aristovich	Deputy Chairman of the Committee of the State Council of the Republic of Crimea on People's Diplomacy and Interethnic Relations, Chairman of the public organisation “Tavrída Regional National and Cultural Autonomy of Greeks of the Republic of Crimea”

Exhibit D**Mediacentre n.a. I. Gasprinsky, List of books published by the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”.****List of books published by the State Autonomous Institution of the Republic of Crimea “Mediacentre n.a. I. Gasprinsky”****10 books published in 2015.**

##	Title
1.	"Russia, the West and the Muslim World", I. Gasprinsky;
2.	"Chynlar ve maneler", K.Jamanakli;
3.	"Eight Steps in the Footsteps of a Teacher", R. Shakir-Aliyev;
4.	"The I. Gasprinskiy Crimean Tatar Republican Library: 25 Years";
5.	"Fikir Injileri, U. Kurkchi;
6.	"Takdirler Alemi", S. Medjitova;
7.	"Calendar of Significant and Commemorative Dates", D. Belyalova;
8.	"Tales and Legends of the Tatars of Crimea";
9.	"Bekle meni den'iz", B. Ablaev;
10.	"Ocular", L. Haibullaeva, Z. Islyamova.

23 books published in 2016.

##	Title
1.	"Fikir Injileri;
2.	"San'yrzyz alem", A. Veliyev;
3.	"Origin of the Crimean Tatars", A. Memetov;
4.	"Crimean Bulgarians: Historical and Ethnographic Sketch", I. Noskova;
5.	"Crimean Tatar violin music", N. Amedov;
6.	"The Book of Travel. Crimea and Adjacent Regions", by E. Chelebi;
7.	"The historical and cultural heritage of the Crimean Karaites";
8.	"The Germans of Crimea. The Spirit of Activity", Y.N. Laptev, Y.K. Gempel;

9.	"Kyrymchahlar", N. Sumina;
10.	"The Almanac";
11.	"Tales and Legends of the Crimean Tatars";
12.	"The Peoples of Crimea", Laptev Y.N., Prokopenkov V.N.;
13.	"Tylysimli masallar", R. Suleymanov;
14.	"Sailama Eserler", R. Fazil;
15.	"Aineji tilkichik", Dermenji;
16.	"Tylysymly kyuvet", L. Shamil;
17.	"Qyssa-i Yusuf", by Khalil oghlu Ali;
18.	"Masallar balalar ichun", A. Useinov;
19.	"Alim akında yır, legend ve khatyrlav jıyıntığı";
20.	"Aivanlar akında masallar", L.N. Tolstoy;
21.	"Kyrym Tatar Masallar ve Legendalar";
22.	"Balychyk ve balikchi akynda masal", A.S. Pushkin;
23.	"Masallar", H.H. Andersen;

33 books published in 2017

##	Title
1.	"Tales and Legends of the Crimean Tatars" in Russian
2.	"Yurek syrlarym" collection of poems in the Crimean Tatar language by V. Kipchakova
3.	"Ismail bey Gasprinsky. Ayats ve faalieti" by S. Gafarov, translated by R. Fazil.
4.	"Chokarak" collection of selected poetry, in Crimean Tatar by B. Mambet
5.	"Crimea. Surb Khach Monastery" in Russian and Armenian
6.	"Unruly Taurica. Asandr" in Russian by Kesmeji
7.	"Eger anamny tapsa edim..." a collection of stories in Tatar, by Ilyasova
8.	"Altyn Ornekler" (golden patterns) collection of stories in Crimean Tatar, Useinova
9.	"Combat Officers", Veliyev

10.	"Crimean Tatar artists, masters of arts and crafts and architects", E. Cherkezova
11.	"Buyuk-As", by U. Kenzhikaeva, in Crimean Tatar and Russian
12.	"Crimean Tatars in the underground guerrilla movement in the Crimea during the Great Patriotic War (1941-1944)". Documentary study, in Russian. Author R. Muzafarov
13.	Baar (novel) by I. Abduramanov, in Crimean Tatar
14.	"Halk shairi Eshmyrza" (facsimile edition), by Eshmyrza
15.	"In Search of the Elixir of Rebirth", in Russian. Author F.Y. Yakubov
16.	"Vatanda bir ev kurayym", (story) in the Crimean Tatar language. Author M. Mambetova
17.	Zamanyymyzy karamany (A Hero of Our Time), by M. Lermontov (facsimile edition), in Crimean Tatar
18.	"Ikyayeler" (stories), by M. Gorky (facsimile edition), in Crimean Tatar
19.	"Ornamental Embroidery of the Crimea" (facsimile edition), by P.Y. Chepurina in Russian
20.	"Almanac No. 7". A collection of stories by Armenian writers in Russian and Armenian
21.	"Children's notebook" work for accordion and accordion, by Ibadlaev
22.	
23.	"Eski kyuyu" (The old well) by Memetov N.
24.	"Tatar Tilinin Grammatics. Phonetics, Morphology, Syntax", by E. Kurtmollaev, A. Islyamov.
25.	Wings Grow in the Sky, by Chalbash E.U., in Russian
26.	"Altyn Yuzyuk" (Equiritual songs) by Pintya I.V.
27.	"Current Problems of Crimean Tatar Philology" in Russian, by A.M. Emirova.
28.	"Vak'yt beklemey" (Time does not wait) by Emirov A., in Crimean Tatar
29.	Crimean Tatar children's calendar - flip-flap, AZ Author Yunusova E.R.
30.	"Concordance of Hearts" Translations of poems into Russian. Translation by Golubeva O.
31.	"Aziz Khalkyma" (To My People), a collection of poems, in the Crimean Tatar language. Author Asanin I., compiled by Khairedinova Z.Sh.
32.	"The Estonian settlement of Konči Šavva", by Salman L., in Russian
33.	"Chechekler aleminde" (The World of Flowers), in Crimean Tatar by A. Osmanova.

33 books published in 2018

##	Title
1.	"The Greeks of Crimea" in Russian, by Panayot Kesmeji
2.	Ilk bilgiler (First Knowledge) - A collection of poems and stories for children aged 3 to 12 about holidays, national heroes and traditions of Crimean Tatars in Crimean Tatar, author: Hayredinova Nial
3.	Adalet kureshi saflarynda (In the ranks of the struggle for justice) Book 4 in the Crimean Tatar language, by: Zera Bekirova
4.	"With Dance Through Life" in Russian, by R.U. Bakkal
5.	Author's album "Songs embroidered with threads" in Ukrainian and Russian, compiled by: Roik V.M.
6.	"Scraps of Memory" collection of works in Russian and Armenian, by Rushan Pilosyan
7.	"Belarusians" in Russian by author-compiler Balayan B.S.
8.	"Kyrymtatardzha laf etmege ogrenemiz" (Learning to speak Crimean Tatar), phrasebook in Crimean Tatar and Russian, by N.M. Ganieva, L.M. Bryukhova.
9.	"Gonyul Ezgileri" (Songs of the Soul), a collection of poems in the Crimean Tatar language, by A. Osmanova.
10.	"The Three Ages of Osmanchik" in Russian, by Tabakurskaya L., Timirgazin A.
11.	Almanac No. 8, 2018. A collection of stories by Armenian writers in Russian and Armenian
12.	Halk Sevgisini qazangan yirji, in Crimean Tatar, compiled by: Z. Bekirova.
13.	"The Bulgarians of the Crimea. Return to the roots" Photo album in Russian and Bulgarian by Ludmila Radeva
14.	The White Book of the National Movement of the Crimean Tatars in Russian, by Y.B. Osmanov.
15.	"The Russian Community of Crimea: the Road to Russia.Part 1.Memories of Veterans of the Community" in Russian, co-authored by I. Evtyushkin.B.
16.	"Traditional culture of the Crimean Tatars", Compiler-Editor: Churlu Mamut
17.	"Approaching the Horizon", by S.G. Yurieva, N.G. Yurieva
18.	"Sary Gul", by: Kadirova Uriye.
19.	"Uzyulgen zynjyr" by: Pashi I., compiled by: Salyadinov K.
20.	"Sailama eserler", by Ipchi U., compiled by Ipchi Y.

21.	"Tan'nag'mesi", by: Seytumerova Alie
22.	"The Karaite cemetery in Feodosia. History Sealed in Stone" by V.A. Eliashevich.
23.	"Sailama eserler", by: Edemova Uriye
24.	"Kechmish ile kuryushuv", by: Bekirov Sh.A.
25.	Music by Fevzi Aliyev, author: Aliyev F.
26.	"Qalbmimnin Ai Zary", by: Chaylak Refat
27.	Facsimile edition of "Yahshy ne ve yaramai", by V. Mayakovsky
28.	Facsimile edition of "Kyrym Eskizleri", by A.M. Gorky
29.	"My favourite Crimea", Wreath of Crimean Graces Project, by: Shevchenko T.
30.	Facsimile edition of Adji Murat, by L.N. Tolstoy
31.	"In the Museum of History, Culture and Religion of the Crimean Karaites-Türks named after Tamara Ormeli", author: Polkanova A.Yu.
32.	"In the Afternoon", by: Petrosyan M.A.
33.	"The Krymchaks. Historical and Ethnographic Sketch" by Achkinazi I. V.

36 books published in 2019

##	Title
1.	"Crimean Tatar poetry of the Khan period" set of postcards in Crimean Tatar and Russian, author-compiler: Zarema Trasinova
2.	Asanchik ve Kashkachik (Asanchik and Kashkachik, Asanchik i Kashkachik, Asanchik and Kashkachik) in Crimean Tatar, Russian, Ukrainian and English, by Rustem Muedin, compiled by Fevzi Rustemovich Muedinov
3.	"Ana kalbi" (Mother's Heart) collection of poems in Crimean Tatar, by Riza Yusufov
4.	A collection of articles and stories in Armenian and Russian, 'Almanac 9' ('Motherland in the Heart')
5.	Collection of articles and stories in Russian by the Crimean Krymchak Society "Krymchahlar" Public Association "Almanac 9"
6.	"Kelejekni oylap: A collection of journalistic articles", in <i>Crimean Tatar and Russian</i>
7.	"Revision Tales of the Crimean Armenians, 1782", in Russian
8.	Sailama Eseler (Selected Works), in Crimean Tatar by Gulzar Dermendzhi

9.	Kuneshchik (Sunshine), in Crimean Tatar by Yunus Qandym
10.	"Evlyatlargya, torunlargya k'aviy miras k'alajak...". ("A worthy heritage for future generations") a collection of poems in the Crimean Tatar language by Alie Veliulaeva
11.	Balalar dunyasi (Children's World) in Crimean Tatar and Russian by Ablyaziz Veliyev, translated by Olga Golubeva
12.	"Eyilikler Olsun" in Crimean Tatar by Sevil Karashayeva, Ayshe Akiyeva
13.	Essays on the History of Crimean Tatar Music Culture (Genesis, Evolution, Modern State), volume 1 in Russian by Zaatov I. A.
14.	The Estonian settlements of Jurči and Kijat Orka" in Russian, by Leongard Salman
15.	Duygularım (My Feelings) in Crimean Tatar, by Bilal Mambet
16.	The Germans of Crimea - Life for Good" in Russian, by I. P. Zadereichuk.
17.	Production of the catalogue "Crimean Tatar Art" (volume 1). Paintings, graphics, sculpture in Russian compilers: Zaatov I. A., Izetov
18.	Terms of Reference for the production of the book Silama Eserler (Selected Works) Volume I - and Volume II in the Crimean Tatar language, by Ablyaziz Veliyev
19.	Syrly, tylsymly dunya (The mysterious magical world), in Crimean Tatar, by Isa Abduraman
20.	"Mayys Yagmury Sepelegende" ("When it Rains in May"), in Crimean Tatar, by Gulnar Ziyadinova
21.	Insanlık Borju (Man's Duty), in Crimean Tatar, by Kadyr Veliyev
22.	Saylama Eseler (Selected Works), in Crimean Tatar, by Dzhevdet Ametov
23.	"Akim Dzhemilev - war hero and dance genius", in Russian, by Sh. Abduramanova
24.	"En'kadirli, suygen yerim" (The dearest favourite place), in Crimean Tatar, by Kerim Jamanakli
25.	"Crimean Tatar cuisine: original recipes", in Crimean Tatar and Russian, by R. Ibadlaev
26.	"My Crimea is a tormented song", in Crimean Tatar and Russian, by Osmanov Dilyaver
27.	"Sary Kunesh" (The Yellow Sun), in Crimean Tatar, by Nadzhie Ametova
28.	"The French of Crimea" in Russian, by Amfiteatrova J. S. C.
29.	"Music of a Stone", in Russian and English by Yakubuk P. G.
30.	"Qisqachlar qayda qışlaylar" and "Tav evchikleri", in Crimean Tatar (reprinted edition), by V. Bianki

31.	"Aglavuk kyzчыk" and "Ormanda yıldızchıklar", by A. Barto (reprinted edition), in Crimean Tatar
32.	"Architecture of the Crimean Armenians" in Russian, by O. Khalpakhchyan, compiled by T. E. Sargsyan.
33.	"Yyrlar jayintygy 1940", (reprinted edition), in Crimean Tatar
34.	"Kyrym Tatar Ornekleri Boyundja Boyalav Defteri" in Crimean Tatar and Russian, by R.I. Vaapov.
35.	"Proverbs, Sayings and Omens of the Crimean Tatars, 1914 in Crimean Tatar and Russian (facsimile edition)
36.	"The Prehistoric Past of the Crimea" in Russian, by G.A. BONCH-OSMOLOVSKY (facsimile edition, 1929).

30 books published in 2020

##	Title
1.	"My mother's image is a guiding star", by S. Medjitova. Medjitova
2.	What Animals Talk About, by A. A. Chergeev
3.	"Lines as the patterns of a rushniki" by N. S. Ryndych
4.	All things can wisdom and years, by A. S. Sklyaruk
5.	"Kyrym Tatar halkynynyn karaman kyzy" (Girl - Hero of the Crimean Tatar people), compiled by U. Edemova
6.	Krymchahlar Almanac, by A.N. Sumina
7.	"Tufanda k'algyan kyoy suryusi" (The storm that seized a flock of sheep), by Yu.Bolat, compiled by V.V. Kachula and N.S. Bekirov
8.	Photo album "The Legend of the 20th Century: Amet-Khan Sultan" by V.M. Basyrov
9.	Ivan Genov: The Fate of the Partisan, co-authored by M. E. Sudnev, I. A. Noskova
10.	"Living Witnesses to Events: The Little Heroes of the Great War" by N.P. Kriklya, co-author
11.	Book Almanac No. 10 "Motherland in the Heart", compiled by: R. K. Pilosyan. K. Pilosyan
12.	The Legends of the Crimea for Children by M. H. Fayzi.
13.	"Sailama eserler" ("Selected works"), author: Cherkez-Ali (Ch.-A. Ametov), compiled by: R. Ametov

14.	"Sailama eserler uch tomlykъ. Birinji vol: novostler" (Selected works in three volumes. Volume one: novels), by Uriye Edemova
15.	"Loyal Daughters of Crimea" (Officers, Partisans, Underground Women) by L. Khalilova
16.	"Crimean Tatar women in the Great Patriotic War" Vol. 4, by A. Veliyev in Crimean Tatar and Russian
17.	Tebessum ile yasha (Live with a Smile) Book Musical collection, by S. S. Kakura
18.	"Istek. (Desire) Poems, Memoirs, by: Dermendji L.
19.	"Crimean Tatar-Russian Dictionary (1916)" by Bilâl Terlekçi [Qırımtatarca-rusça luğat (1916)] [Bilâl Terlekçi], Special editor, foreword author: I.A. Kerimov, Editor: T.N. Kirimov, compiler: H.B. Terlekçi
20.	"Sailama eserler alty tomlykъ". Birinji vol: shiirler ve novostler (Selected Works in Six Volumes. Volume One: Poems and Stories), by Sh. Alyadin compiled by Alyadinova L.
21.	HISTORY OF THE NATIONAL ORGANIZATIONS OF CRIMEA, by B. S. Balayan
22.	"The Folklore Heritage of the Thracian Greeks of the Republic of Crimea", co-authors: Kifnidi S. A., Lazaridi S. A., Banach L. S.
23.	"Between Crimea and Paris", by: Kenzhikaeva U.
24.	"Crimean Tatar music by professional composers" by F. M. Aliyev.
25.	"Uchurym bashynda (Above the precipice)", by: Mambetova M.
26.	"Alem-i teselli (Graceful Peace)", by Voloshin M. (Translated into Crimean Tatar by Yunus Qandym)
27.	"Sailama eserler (Selected works)", by Murad R., compiled by Mambetova M.
28.	Military and patriotic album "There was a war..." by Olkhovskaya V. Ya. Я.
29.	"Menim Yollarym" (The Road Acquired) by Emin S. compiled by Ilyasov D., Khurshutov A., Osmanov D.
30.	"The contribution of the repressed peoples of the USSR to the victory in the Great Patriotic War of 1941-1945", compiled by: Akieva S.I., Kurtseitov R. J.

31 books published in 2021

##	Title
1.	"Agathangel of Crimea - Son of Three Nations", by E. Belousov

2.	"Kyrym bizim er sheyimiz", by R. Gafarov. Gafarov
3.	Unusual inhabitants of the Crimea, by V. Olkhovskaya
4.	"Duwan S. Memories", co-editor-compiler: V. Strunina
5.	The Complete Works. Literary Works. Volume 1, by I. Gasprinsky, compiled by S. Seitmemetova, G. Seitvaniyeva
6.	"Hayatny bakhshyshlary", by G. Useinova
7.	Facsimile edition of "Izergil k'arty" (The Old Woman Izergil), by A. M. Gorky
8.	Facsimile edition of Robinson Crusoe, by D. Defoe
9.	Facsimile edition of Menim Aivanlarym, by V. Durov
10.	Almanac No. 11 "Motherland in the Heart", compiled by: R. Pilosyan Pilosian
11.	"Tylsimli masallar", by R. Suleymanov.
12.	"Gonyul Ilhamy ve Emirinen", by A. Kokieva
13.	"A Quiet Place on the Colon of Vicinity. Vibrant creations. Bakiyilik avuchyndaki chehek. Saylama eserler", by L. Ukrainka, translated into Crimean Tatar by Y. Kandym, compiled by V. Basyrov
14.	On the Road, by O. Gabrielyan
15.	"Edebiyatshynaslyk ve medeniy ayat", by S. Yunusov
16.	"Karaites - the last inhabitants of Mangup", Compilation Editors: V. A. Eliashevich, I. S. Lipunov, M. B.Kizilov
17.	"Righteous among the Nations of the World in the Republic of Crimea", compiled by: A. Gendin
18.	Mummy's Fairy Tales, by A. Em (M. Heydiūnas)
19.	Album "Artist Mamut Churlu", by M. Churlu
20.	The Legacy of the Ancestors, by I. Abdullayev, compiled by E. Seitbekirov
21.	"Hayallarym merjan kibi" by D. Medjitova, compiled by S. Medjitova
22.	"The Burnt Villages of Crimea during the Great Patriotic War, 1941-1944" by K. Ametov. K. Bokova
23.	"The Link of Times", by P. Kesmeji, compiled by: S. Yurieva (Kesmedji)
24.	"From Ararat to Ai-Petri" by G. Khachatryan
25.	Ebedilik (Eternity), by I. Abduraman

26.	"Yuri Bekirovich Osmanov. A man from another dimension", compiled by A. O. Dobro
27.	"Sailama eserler alty tomlykъ" Ekinji vol. Novestler (Selected Works in Six Volumes. Volume Two. Novels), by Sh. Alyadin, compiled by L. Alyadinova
28.	"I wasn't a guest on earth... Interviews. Memories. List of publications. Volume 1" by V. Basyrov
29.	"Catalogue-album: Akhtem Aliyev - artist and poet", by A. Aliyev, compiled by R. Aliyev
30.	"Crimea 1941-1944. The Reverse Side of the War. Selected aspects of the history of the occupation of the Crimea. Volume 2", by A. Nemenko
31.	Facsimile edition of "Ikyaye Etuv Ichun Makiyaler Jyntygy" by P. O. Afanasyev, I. N. Shaposhnikov, E. E. Solovyova. O. Afanasyev, I. N. Shaposhnikov, E. E. Solovyova

27 books published in 2022

##	Title
1.	"I Love Crimea in All Weathers. Volume 1", by: Djerbinova L.
2.	"Children's Galaxy, by Amedov N.
3.	"Yureklerni tepretken edebiyu kyrym tatar edibiyati akkend maqaleler (Literary world, stirring hearts. Articles on Crimean Tatar literature)", by: A. Dzhemileva.
4.	"Vatan tarta bagirina (I am striving to embrace the Fatherland), by Kafadar E., compiled by Kafadar R.
5.	"Saylama eserler. Uch tomlykъ. Ekindzhi tom. Novel", by: Edemova U.
6.	"Adiy insan olsa da (Even if a simple man)", by: Veliyev (Veli) K.
7.	"Saylama eserler. Alty tomlykъ. Uchunji tom. Narrative, ikyaeler", author: Alyadin Sh. compiled by Alyadinova L.
8.	"Saylama eserler", by Selim Sh. compiled by Jelilova L.
9.	"Tilimiznin degerligi (Wealth of Language)", by E. Bekirov.
10.	"Atalar sösleri ve aytymnar (Proverbs and sayings)", author: Asanov S., compiled by Asanov A.
11.	"Selime Chelebiyeva. Ayyrylamam sanadan. (I will not part with the scene)", compiled by: Jemileva
12.	Facsimile edition. "Songs of the Crimean Turks", by A. Olesnitsky.
13.	Facsimile edition. "Dubrovsky", by Pushkin A.

14.	Facsimile edition. "Ikjaeler (stories)", by Chekhov A.
15.	"Ha-ha-ha", by: Veliyev A.
16.	"Memories of Peter Aljanaka", by the author-compiler: Jan T.
17.	"The Khan's Palace in Bakhchisaray", by V. Gergross.
18.	Crimea. Prosperity in unity.
19.	"Almanac No. 12. Homeland at Heart", co-editor-compiler: R. Pilosyan.
20.	"...(Collected Essays)", by Petrosian M.
21.	"Alexander Mikhalyants. Jewellery Art. Enamel. Sculpture. Painting. Photo", author: Mikhalyants A.
22.	"Poems and songs", by: Klossowski I.
23.	Greeks. Crimean Hellas. Authors-composers: Schonus I.A., Pipia O.M., Laptev Y.N., Gabrielyan A.O., Budurova N.V.
24.	"The shtetl mystery of Elena Kotlyar", by: Kotlyar E.
25.	"URANOIS (Heaven)", by I. Borokhov.
26.	"Ashik Garip. A Krymchak tale", by Reby D., compiled by Zengina N.
27.	"Durante (Persistent)", by Petrov A. (Krymsky A.)

L. Khalilova, FAITHFUL DAUGHTERS OF CRIMEA: OFFICERS, PARTISANS, UNDERGROUND WOMEN (Mediacentre n.a. I. Gasprinsky, 2020).

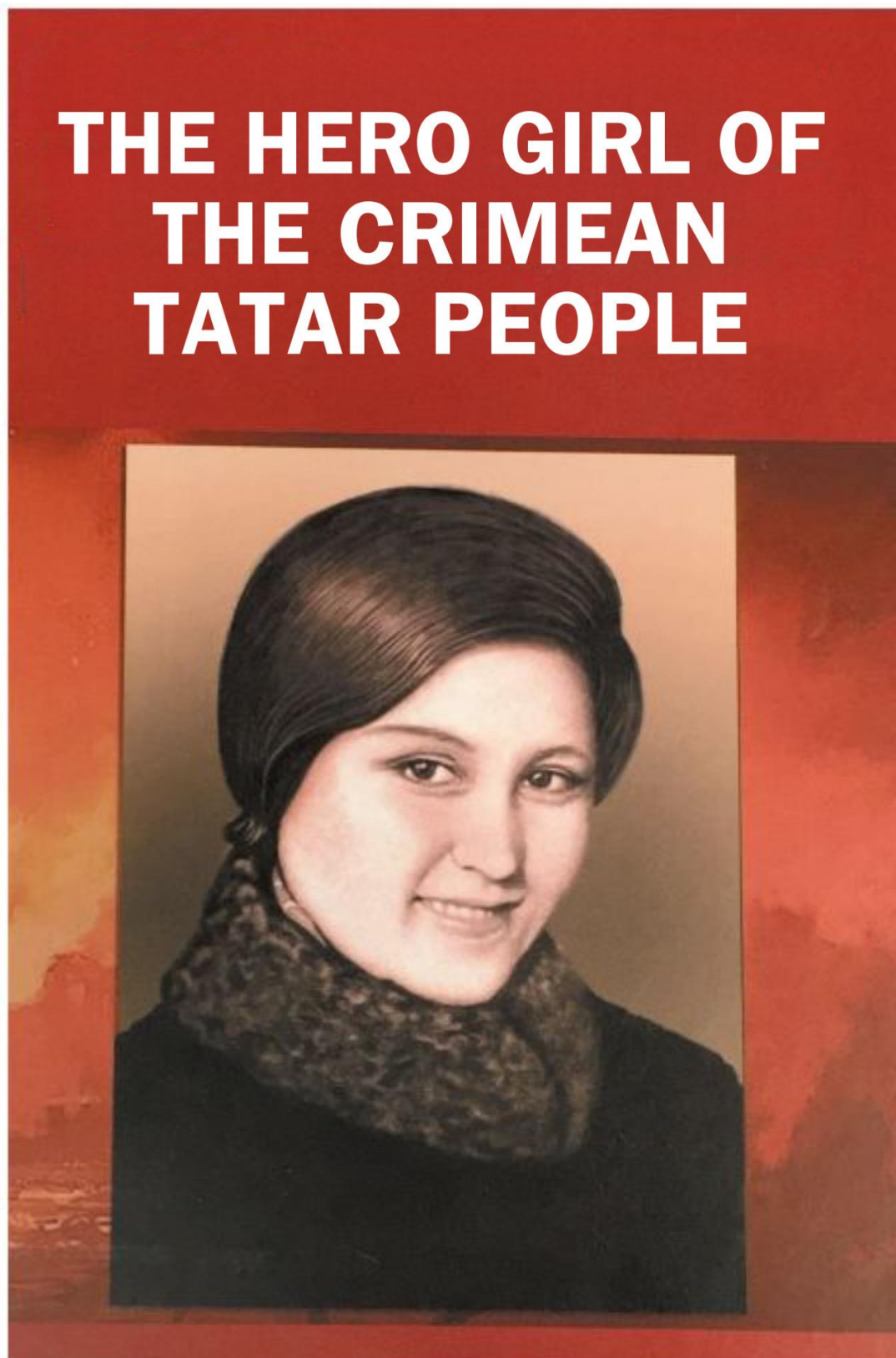
FAITHFUL DAUGHTERS OF CRIMEA

OFFICERS, PARTISANS, UNDERGROUND WOMEN



Exhibit F

U. Edemova, THE HERO GIRL OF THE CRIMEAN TATAR PEOPLE (Mediacentre n.a. Gasprinsky, 2020).



UDC 821.512.19-94

BBC 84 (2Ros)

K 977

Approved by the Advisory Council on the Publication of Socially Important Literature in Native Languages at the State Autonomous Institution of the Republic of Crimea Mediacentre n.a. Ismail Gasprinskiy. Published with the support of the State Committee on Interethnic Relations of the Republic of Crimea at the expense of the federal budget, the budget of the Republic of Crimea, is not subject to commercial distribution

K 977 The Hero Girl of the Crimean Tatar People: collected book / compiler U. Edemova - Simferopol: State Autonomous Institution of the Republic of Crimea "Mediacentre n.a. Gasprinsky", 2020. — 504 p. : illust. — In Crimean Tatar and Russian languages.

UDC 821.512.19-94

BBC 84 (2Ros)

ISBN 978-5-6044686-1-6

The book "The Hero Girl of the Crimean Tatar People" is an extensive collection of fiction and documentary works dedicated to the difficult fate and heroic deed of Alime Abdenanova. The name of the legendary hero girl, a Soviet servicewoman of Crimean Tatar origin and a resident of the intelligence department of the Primorskaya Army Headquarter during the Second World War, will live forever in the memory of generations.

© U. Edemova, compiler, 2020

ISBN 978-5-6044686-1-6

© SAI "Mediacentre n.a. Gasprinsky", 2020

[...]

Exhibit G

S. Akieva, R. Kurtseitov, CONTRIBUTION OF THE REPRESSED PEOPLES OF THE USSR TO VICTORY IN THE GREAT PATRIOTIC WAR OF 1941-1945, VOLUME II. CRIMEAN TATARS, BULGARIANS, GREEKS AND ARMENIANS OF CRIMEA MESKHETIAN (AHISKA) TURKS (Mediacentre n.a. Gasprinsky).



*Crimean Tatars
Bulgarians, Greeks and Armenians of
Crimea
Meskhetian (Ahiska) Turks*

**CONTRIBUTION
OF THE REPRESSED PEOPLES OF THE USSR
TO VICTORY
IN THE GREAT PATRIOTIC WAR
1941-1945.**

VOLUME II

Annex 39

A. Dyukov, M. Vilkov, FROM MURDERS TO POGROMS: UNPUNISHED VIOLENCE
FROM THE SIDE OF RIGHT-WING ACTIVISTS AGAINST ROMA IN UKRAINE
(Warsaw, 2018).

FROM POGROMS TO MURDERS

**UNPUNISHED VIOLENCE FROM THE
SIDE OF RIGHT-WING ACTIVISTS
AGAINST ROMA IN UKRAINE**

INTERREGIONAL MOVEMENT
"FOR THE DEMOCRACY AND HUMAN RIGHTS" REPORT



FROM POGROMS TO MURDERS

**UNPUNISHED VIOLENCE FROM THE
SIDE OF RIGHT-WING ACTIVISTS
AGAINST ROMA IN UKRAINE**

INTERREGIONAL MOVEMENT
"FOR THE DEMOCRACY AND HUMAN RIGHTS" REPORT

Edited by A. Dyukov, M. Vilkov

Warsaw
2018

UDK 316.485.26
 BBK 92
 O 80

Since spring 2018, Ukraine saw a series of violent attacks on Romani camps. These attacks were committed by members of state-supporting Neo-Nazi groups, such as C14 and National Squads (Druzhyny). The Ukrainian authorities display reluctance to resist violence of 'patriotic' far-right radicals.

The report sums up information about attacks on Romani, committed by Ukrainian Neo-Nazis from April to June 2018.

O 80 From pogroms to murders: unpunished violence from the side of right-wing activists against Roma in Ukraine. Interregional movement "For the Democracy and Human Rights" report / Edited by A. Dyukov, M. Vilkov. — Warsaw, 2018. — 48 pages.

Starting from the spring of 2018, there have been registered numerous attacks on Roma camps in Ukraine. These attacks have been organized by the members of pro-State neo-Nazi groups, such as C14 and "National Druzhina". Ukrainian government demonstrates reluctance to counteract the violence against Roma people from the side of "patriotic" right-wing activists.

The information on the attacks on Roma people committed by Ukrainian neo-Nazis in April-July 2018 is systematized in this report.

UDK 316.485.26
 BBK 92

© Interregional movement "For the Democracy and Human Rights", 2018

Pogrom of the camp at Lysaya Gora (Kiev, April 20, 2018)

“No Gypsy at Lysaya Gora any more. Yesterday, they ignored our ultimatum, few of them had left the park. However, after strong legal arguments others decided to leave the forbidden territory too. We collected practically all the garbage after them, demolished the tents and safely burnt them,” wrote Sergey Mazur, one of far-right movement C14 coordinators, on his page in Facebook in the morning on April 21¹.

Mazur illustrated his words publishing a photo of fighters in black uniform with sign C14 on their sleeves (a lot of them with their faces masked) damaging and burning tents in the camp.

On April 23, victims told Hromadske Radio that the pogrom took place on April 20², hence it was birthday of Adolf Hitler. Neo-Nazis around the world often time their acts to this date. It should be noted that C14 band repeatedly used racist symbols (Celtic crosses) on their banners and flags on public events³ and has been often defined by experts as Neo-Nazis. In November 2017, Terrorism Research & Analysis Consortium (TRAC) of



C14 members during the Roma people pogrom at Lysaya Gora (Kiev, April 20th, 2018)

¹ Post in account of user «Сеприй Маур» on Facebook. 21.04.2018. URL: https://www.facebook.com/permalink.php?story_fbid=169051267138219&id=100021000394552

² «They came with knives, bats and guns». Romani version of arson of the camp at Lysaya Gora// Hromadske Radio. 23.04.2018. URL: <https://hromadske.org/news/2018/04/23/vony-priyshly-z-nozhamy-bytamy-i-pistoletamy-romska-versiya-pidpalu-poselelnya-na-lysiy-gori>

³ Photo: March of volunteers in Kiev ended quietly, demonstrators dispersed (16 photos) // News TV Service website of 1+1 Channel. 04.07.2015. URL: <https://ru.tsn.ua/foto/marsh-dobrovoivcey-v-kieve-zavershilsya-spo-koyno-demonstranty-razoshlis-446211.html> Fighters of Mirotvorets are on bail in Sievierodonetsk// Ukrainska Pravda. 15.08.2016. URL: <https://www.pravda.com.ua/news/2016/08/15/7117810/>

Maryland University (USA) put C14 on its online list of terror organisations, classifying it as 'a racist terrorist group' and 'an extremist right-wing terrorist group'. As for the tactic used, C14 is characterized as one using 'Armed assault' and 'Arson/Fire Bombings as a Terrorist Tactic'⁴. Andreas Umland, an expert of Euro-Atlantic Cooperation Institute (Kiev) said in the interview to Hromadske Ukrainian TV channel on May 7, 2018 that 'C14, which used to be thought a youth wing of Svoboda Party, can be now classified as a Neo-Nazi one'⁵.

Interestingly, this organisation's activity is financed by the Ukrainian authorities. According to website of the Ministry for Youth and Sport, Educational Assembly, an organisation registered by C14 in 2017, was a Ministry's partner in arranging events in Kiev, the Zhitomir and Chernovtsy Regions, aimed at 'national and patriotic education'⁶.

According to Hromadske Radio referring to inhabitants of the camp, during the attack there were 18 adults and 13 children in the Romani encampment at Lysaya Gora. They were attacked by 30 Neo-Nazis (or around 20, according to a post published by Hromadske Radio reporter Evgeny Savvateev on Facebook on April 23 who phoned to Vitaly Kulchara, an eye-witness of the pogrom⁷). The Roma could hardly estimate the number precisely, though the odds were definitely in Neo-Nazis' favour.

'We managed to talk to volunteers who helped victims of the pogrom,' Maria Guryeva, press-secretary of Amnesty International Ukraine, told Fakty, Ukrainian newspaper. 'They say that one Roma Vitaly Kulchara came back to the camp and saw the tents burning. He tried to speak to nationalists who who played the masters in the camp, but they ignored him. They sprayed gas from balloons into children's faces and shot into

him, though did not get into him... In addition, Vitaly Kulchara says that nationalists cut his wife Aranka's suitcase with knives into peaces, found two thousand hryvnas and took them. It should be added that there was a six-year-month boy among children in the camp during the pogrom'⁸.

On April 25, LB.ua website published a video showing on of the camp pogrom scenes at Lysaya Gora. It shows a group of Roma including children walking themselves and women with children in their arms, crying 'Police!' and running from Neo-Nazis in black uniform who were throwing stones into them. Keeping up with the Roma C14 spray tear gas into their faces⁹.

'They were chasing us with sticks and stones. When were reached garages they came back to burn our belongings,' Aranka Kulchara, who suffered with her family from the pogrom at Lysaya Gora, told reporters of Zaborona project (journalists found her in July in the Transcarpathian Region where the community had moved)¹⁰.

'they came with knives and threw whatever was at hand,' Vitaly Kulchara told Hromadske Radio. He also mentioned that the attackers shot with guns and one of the shots was made into him. According Timea, 13-year-old resident of the camp, 'a big black man in a mask... threw a stone into my hand, [it] hurt a lot.'

As for law enforcement forces, they came soon, says press-secretary of Amnesty International Ukraine, 'The man [Kulchera] hid behind garages and called the police. According to Vitaly, they arrived as late as in half an hour. When they saw what was happening in the camp, they just advised the man to leave Kiev and took no measures.'

'One police car with three officers came to the encampment. I told them that children were in the camp while the attackers came with knives and shot. But police just said, 'You'd better go away,' said Vitaly Kulchara in the interview to Hromadske Radio on April 23.

Tellingly, that management of Kiev National Police preferred not just to pretend that nothing had happened but also called burning of

⁸ *Mikhail Sergushev*. Pogrom of Roma camp at Lysaya Gora: did police come? (updated, photo, video) // Fakty. 25.04.2018. URL: <http://fakty.ua/266106-pogrom-cyganskogo-tabora-na-lysoj-gore-policiya-vse-taki-pritezhala-foto>

⁹ Roma camp destroyed at Lysaya Gora // Ib. Ua channel in YouTube. 25.04.2018. URL: <https://www.youtube.com/watch?v=IxJkRkeJvdPk>

¹⁰ From clean-up to murder. Report about attack on Roma // Nastoyashcheye Vremya. 11.07.2018. URL: <https://www.currenttime.tv/ua/29352990.html>

⁴ C14 aka Sich — Ukraine // (Terrorism Research & Analysis Consortium. [November 2017.] URL: <https://www.trackingterrorism.org/group/c14-aka-sich-ukraine>

⁵ *Ulyana Boychuk*. Who Neo-Nazi are and if they are in Ukraine // Hromadske. 07.05.2018. URL: <https://ru.hromadske.ua/posts/kto-takye-neonatsisty-y-est-ly-ony-v-ukrayne>

⁶ *Aleksy Romanov*. Socially homogeneous nationalists. How authorities sponsor far-rights of C14, suspected of the murder of Oles Buzina // Strana. 29.11.2017. URL: <https://strana.ua/articles/rassledovanie/108242-radikalnuju-hruppirovku-s14-podderzhivajut-hosstruktury-ukrainy.html>

⁷ Post in «Eugene Savvateev» account on Facebook. 23.04.2018. URL: <https://www.facebook.com/photo.php?fbid=180868963854596&set=2.244808385576070.61148.100001407300103>

the camp to be a 'clean-up for burning garbage'. As for Lysaya Gora... we do not received a single complaint from Roma about violence or beating. And, as far as I know, members of district administration and fire fighters were present during that clean-up', Andre Krishchenko, Head of Chief Department of the National Police in Kiev and Deputy Chief of the National Police of Ukraine, told 112 Channel on April 24¹¹.

Andrey Savvateev, Hromadske Radio reporter, announced on Facebook on April 23 that victims had a comment about 'members of district administration', mentioned by Krishchenko, who were present at 'burning of garbage'. 'A few days before the arson, people who represented themselves as officials of the district administration, came. They checked if families had bought tickets to the Trscarpathian Region. Not all people had them. On the day of arson (but before it started) the Roma went to a railway station wneh suddenly one of those people from administration called Vitaly and told him that they could come back and go on living at Lysaya Gora. When they returned to Lysaya Gora, about 20 armed people were waiting for them and they started to attack the Roma.'

It should be noted that C14 has close cooperation with local authorities in Kiev. According to Ukrainian website Strana, in December 2017, a member of this Neo-Nazi band was officially appointed a chief of local Municipal Varta (Kiev Municipal Security, which is a social group, formed in June 2017 by Kiev Administration) by the head of Holosevsky district administration in Kiev in order to protect law enforcement in Kiev)¹². It is Holosevsky district where Lysaya Gora is situated.

On April 27, Natalya Bondar, head of Holosevsky district Administration, admitted in the interview to Nastoyashcheye Vremya newspaper that these visits of members of the district administration to the camp at Lysaya Gora before the pogrom took place indeed. 'We held offsite meeting together with police. We were checking if there

were violation of children's rights. We warned residents of the camp that they should maintain hygiene.¹³

Actually, the same cooperation was described by Sergey Mazur on Facebook on April 19. 'Romani have occupied Lysaya Gora again. They are even more numerous this time... C14 together with Municipal Security and Holosevsky District City Administration repeatedly delivered an ultimatum that they should leave the territory till the next day. If they ignored the claim, we would talk to them in another way.¹⁴

In his turn Krishchenko told LB.ua on August 3, 2018 that he supported Municipal Security, and added that Kiev police headed by him closely cooperated with the organisation consisting of far-right radicals. 'I strongly support Municipal Security. We also work together with Maidan social organisation. They are fine guys. And guys from Municipal Security who used to fight in the anti-terror operation, have passed our training. And they help us.¹⁵

Artem Skoropadsky, press-secretary of the Right Sector, showed support of pogrom of the Romani camp at Lysaya Gora, committed by C14. 'Today, I talked to Andrey Skoropadsky, spokesman of the Right Sector. I asked for his opinion about arson at Lysaya Gora,' wrote journalist Margarita Bondar in her article published on April 25 in left-wing newspaper Spilne. 'He said that those guys had done it absolutely right and hoped that they would continue work at destroying of Roma camps further.¹⁶

It should be noted that C14 declared its readiness to continue attacks on Romani in Kiev. 'We plan other actions against illegal acts of Roma next week,' wrote Sergey Mazur on Facebook on April 21.

On April 24, Amnesty International demanded that an investigation of pogrom at Lysaya Gora should be held. It was written at their Ukrainian branch that 'it is important to realise that anyone can become

¹³ Attack at clean-up. What happened to Romani camp in Kiev // Nastoyashcheye Vremya. 27.04.2018. URL: <https://www.currenttime.tv/a/29196531.html>

¹⁴ Post in account of user «Cepрий Мауэр» on Facebook. 19.04.2018. URL: https://www.facebook.com/permalink.php?story_fbid=168630903846922&id=100021000394552

¹⁵ Sonya Koshkina, Oleg Bazar. Andrey Krishchenko: 'I would legalize drug possession // LB.ua. 03.08.2018. URL: https://lb.ua/news/2018/08/03/404297_andrey_krishchenko_hranenie.html

¹⁶ Rita Bondar. «C14», Roma and pogroms // Spilne. 25.04.2018. URL: <https://commons.com.ua/uk/s14-romy-i-pogromy/>

a victim of these attacks: Romani, women, anti-corruption activists, Jews, LGBT, journalists, artists, students or writers. No one can be sure that they will not become next victim of a radical pack, who feel their impunity. They mask themselves with patriotism and care for society, but in fact, they are terrorists for civilians. At the same time, law enforcement bodies do nothing in most cases,' said Oksana Pokalchuk, head of Amnesty International Ukraine. Amnesty International urges the Ukrainian authorities to react to the events at Lysaya Gora in Kiev overnight into April 21, as well as immediate and effective investigation of the attack.¹⁷

Only after that, on April 25, National police of Kiev announced initiation of a legal proceeding after pogrom of Romani camp under Article 161 (Violation of equality of citizens due to their race, nationality or religion) and Article 296, part 2 (Hooliganism) of the Criminal Code of Ukraine (CCU)¹⁸.

On May 7, Arsen Avakov, Minister of Internal Affairs said at briefing, 'A legal proceeding has been launched due to the attack on Romani camp, several people are suspected.'¹⁹.

However, the first and the only one against whom charges were brought was Sergey Mazur, coordinator of C14, who published a report about activities of his group against Roma on April 21. This happened not earlier than on July 10, 2,5 month after pogrom at Lysaya Gora occurred²⁰. Mazur's flat was searched on the same day and he was detained by police. Nevertheless, on April 18, Holosevsky district court put the pogrom organiser under house arrest pressed by Neo-Nazis.

¹⁷ Amnesty International urges to investigate pogrom in Roma camp at Lysaya Gora in Kiev. // Amnesty International Ukraine. 24.04.2018. URL: <http://amnesty.org.ua/nws/amnesty-international-vimagaye-rozsliduvati-pogrom-taboru-romiv-na-lisij-gori-u-kyievi/>

¹⁸ Police launch criminal case into publication of video of pogrom against Romani // National police in Kiev. 25.04.2018. URL: <https://kyiv.npu.gov.ua/news/xuliganstvo/policziya-rozpochala-kriminalni-provadhennya-za-faktom-publikacziivideo-napadu-na-romiv/>

¹⁹ *Dmitry Kropivniysky*. Attack: several people face charges// Ukrainian National News. 07.05.2018. URL: <http://www.unn.com.ua/ru/news/1729353-napad-na-romiv-u-kyievi-niztsi-osib-visunuli-pidozri>

²⁰ Coordinator of nationalists from C14 faces charges of pogrom of Romani // Strana. 10.07.2018. URL: <https://strana.ua/news/150827-politsija-soobshchila-chto-predjavila-podozrenija-po-napadeniju-na-romov-na-lysoj-hore.html>

No other people have been prosecuted for the pogrom at Lysaya Gora yet, and even no charges have been brought. What is more, police then started to put pressure on Romani. 'Next day, after we were attacked, police said that we could return to Lysaya Gora,' one of women dwelling in the vamp told journalists. 'Then we decided to return, but when we arrived, there were police and some skinheads in black. They attacked us again. In newspapers you can read about one attack but in fact there were two. I saw those skinheads have guns²¹. Finally, after the second attack Roma had to leave for the Transcarpathian Region.

²¹ *Rima Voistok*. Lifestyle of Transcarpathian Romani: They ran from killers in Kiev Lvov (ФОТО) // ukraina.ru. 27.07.2018. URL: <https://ukraina.ru/exclusive/20180727/1020710191.html>

were published, in particular a big swastika used in the Third Reich was painted at the entrance table of Amnesty International²⁴.

According to posts in Nemezida's Telegram channel, the organisation closely cooperates with C14, and obviously takes it as ideologically close but a larger one.

On April 23, 2018 an announcement was published in Nemezida's Telegram channel: 'We join flashmob of C14 aimed at struggle with Romani parasites in the city of Kiev. The other day our activists have visited a Romani camp situated in Rusanovskiy Sady [country houses on the left bank of the Dniepr which is a part of Dniepropetrovskiy district of Kiev] in houses residents of which had been relocated several years ago for the purpose of building a strategic bridge... In the middle of the country house community Roma pests have settled down and have been spoiling life of local resident for several years. In order to promote their sooner move from Rusanovskiy Sady, we burnt a few houses inhabited by Roma. We also had to 'treat' one Jipsy with pepper spray during the raid. But that's not all and we will definitely come back.'²⁵

Then, the Telegram channel of Nemezida published 'a short video of our actions in one of the slums which burnt down with two more buildings and Roma belongings' as the post of the organisation says²⁶.

A report from the scene was published in YouTube on April 29 2018 by left-wing journalist Margarita Bondar. Angela, Roma, talked to Bondar at the site of fire on April 25. In the video she says, 'It happened two days ago, on Monday [April 23] at 1 or 2 pm... I came into the house and took my child's temperature, and just in five minutes the house was literary boiling with fire. They must have thrown Molotov cocktails.'²⁷

'They could see that a TV set was on in the house, so they nearly burnt alive people,' says Angela with anger. 'Two young guys but people say there also was a third one. In a cap and sports trousers... I went and filed a complaint with police... But no one deals with it.'

As it turned out during the report, after April 23, another strange fire occurred in one of the houses in Rusanovskiy Sady where Roma live. 'On April 24, next day, another house was caught with fire. It was rented by a 21-year-old Sasha who was going to live there with his future family. 'Sasha is also a Roma,' writes Margarita Bondar in her

article 'Camp in fire: on arson, ethnic hatred and Roma families from Rusanovskiy Sady', published on June 4 2018 in Spilne left-wing edition. 'The fire started around 23:00, its reasons are still unknown. A criminal case has not been launched. Roma are sure that that was an arson as there was no electric power in the burnt house'²⁸.

Thanks to the journalist, who published a post with photos from the fire site on Facebook on April 25, attention of other journalists was drawn to the incident. Though police continued to ignore the events.

'On April 26, I go to the scene together with one more person. We ask Angela if she has filed a complaint with police and how investigation was going. Angela answers that she has written them several times but they disappear all the time. We call the police,' writes Margarita Bondar in her article on June 4. 'Police arrives only in more than 40 minutes, questions everyone around about what they saw. Of all evidence of eye-witnesses they write down only mine. They comment on the arson in the way like 'Unless you made troubles here, they wouldn't burn you.' They write down my evidence for a very long time, then ask to sign it and leave my cell number. I do this. But get no calls. On April 27, a criminal case under Rule 194 of the Criminal Code of Ukraine is finally launched (Deliberate damage or destruction of other's property). Evidently, police misses that this property damage posed also a real risk to life.'

None of the guilty of arson of houses in Rusanovskiy Sady aligned with life risk to people inside (including children) has been found yet or brought to court.

On May 3 2018, Nemezida Telegram channel published a post promising 1000 US dollars (the sum later decreased to 500 USD) to anyone who would find journalist Margarita Bondar and make her refuse of her words and call herself a liar in front of a camera²⁹. Police also denied to investigate these threats of Neo-Nazis to the journalist. On May 16, she got an answer to her complaint about threats from Podolskiy Department of Kiev police, saying, 'according to the norms of acting legislation, a threat is considered to be real and having ground for fear for one's life if it is described in detail as well as relevant circumstances (place, time, manner, style of vocabulary, systematization, which were absent in your complaint.'³⁰

²⁴ Post in Nemezida Channel in Telegram. 09.05.2018. URL: https://t.me/nemezida_ua/56

²⁵ Post in Nemezida Channel in Telegram. 23.04.2018. URL: https://t.me/nemezida_ua/30

²⁶ Post in Nemezida Channel in Telegram. 23.04.2018. URL: https://t.me/nemezida_ua/31

²⁷ Preport on arson 23.04.18. // Margareta Bondari channel in YouTube. 29.04.2018. URL: <https://www.youtube.com/watch?v=mT9nuqMDVEs>

²⁸ Rita Bondar. Camp in fire: on arson, ethnic hatred and Roma families from Rusanovskiy Sady // Spilne. 04.06.2018. URL: <https://commons.com.ua/ru/tabor-uhodit-v-peklol/>

²⁹ Post in Nemezida Channel in Telegram. 04.05.2018. URL: https://t.me/nemezida_ua/39

³⁰ Photo in Rita Bondar account on Facebook. 21.05.2018. URL: <https://www.facebook.com/photo.php?fbid=1819308941707319&set=a.1396136660691218.1073741828.100008846922783>

Attack on camp in Lviv (May 9 2018)

Overnight into May 10, 2018, a Romani camp numbering about 30 people was attacked. They lived in tents near Rudnoye town at the border of Zheleznodorozhny district of Lviv.

According to Hromadske Radio sources, several days before the attack residents of the camp got a call with a warning about the attack. This camp and a neighbor one were at risk, 'They said that we should have been careful as someone planned to burn Rudnoye, and [camp near hypermarket] Metro and the one at the far site.'

'According to eye-witnesses, who asked not to publish their names for their safety, the attack was committed by young sporty people wearing black masks. They numbered about 30 people,' Irina Saevich, a Lviv journalist, wrote in her report published by Hromadske Radio on May 11. She had visited the incident scene and spoke to victims.

Tents where Romani lived were burnt to ash. Mikhail Kenyo, authorized representative of Human Rights Committee, told Hromadske Radio that at the fire site there were adust wooden frames of the tents, metal cutlery, half burnt toys, clothes and even an icon.

Many camp dwellers were beaten by the attackers. 'The worst case is with Misha, he has nine children and he is violently beaten, as well as his son who has heart problems. We called ambulance for Misha but he was let after examination. Someone told me that they saw him in the city with his hand bandaged,' residents of the camp told Irina Saevich³¹.



*The aftermath of the attack on the camp in Lvov
(Lvov, May 9th, 2018)*

От поромов к угнетенным. Вспомогательная информация

³¹ Irina Saevich. 'Pogrom in Roma Camp Committed by around 30 Masked Men, victims' evidence' (PHOTO) // Hromadske Radio. 11.05.2018. URL: <https://hromadske.radio.org/news/2018/05/11/pogrom-v-romskomu-tabo-ri-vlashtuvaly-blyzko-trydyvaty-molodykyv-u-maskah-znayomy-poterpi-lyh-foto>

Attack on camp in Ternopil (May 22 2018)

Primary information about it arrived in late evening May 22, 2018 at website 20 Minutes Ternopil: 'Our readers report about detention of unknown people about 10 pm on Tuesday, May 22. Some young people who have damaged Roma camp are arrested in Mikulynetskaya Street near Toyota service centre report our readers. Twelve police cars are there. The press-service of the patrol police department confirms this information. Patrol cars arrived at the scene for assistance, reports the department. Twelve people wanted to damage the Romani camp. Their attitude to the event is investigated now'³⁴.

Judging by Yandex Maps and Yandex Panoramas, a long stripe of forest begins right after the service centre of Toyota in the outskirts of Ternopil. It is here where the attacked Romani camp was situated.

In the morning on May 23, 20 Minutes published new details of the attack: 'Victims say that they were cooking dinner on fire when a group of people rushed in and they heard sounds resembling shooting. Roma ran into the forest. The tents got into fire during the clash. Patrol police went to look for suspects. In one and a half kilometer officers caught a group of people. They were taken into Ternopil police office. Cartridges from the crime scene, probably from air guns were taken to expertise. Police are interrogating people. No one asked for medical assistance'³⁵.



The attack on the camp in Ternopil
(Ternopil, May 9th, 2018)

От порпомов к уніцітрам. Врпоп ромка ОРСЕ

³⁴ *Maryana Dohvat*. Unknown people with bat burn down Roma camp // 20 Khvilin Ternopil. 22.05.2018. URL: <https://te.20minut.ua/Podii/nevidomiz-bitami-hotili-rozignati-tsiganskiy-tabir-yih-zaraz-zatrimue-10693416.html>

³⁵ Roma camp destroyed and burnt down in Ternopil // 20 Khvilin Ternopil. 23.05.2018. URL: <https://te.20minut.ua/Kryminal/u-ternopolya-rozgormili-ta-spalili-tabir-romiv-10693540.html>

Patrol police of Ternopil also told about the incident on its page on Facebook on May 23. 'We got a call saying that in a forest close to Velikaya Berезovitsa village a conflict occurred between 15 young men and members of one local national minority. The caller said that she had heard several gun shots. It happened on May 22 about 9 pm. Several patrol cars and special forces arrived to the scene. They saw a woman keeping a child by hand who was crying. She told about a group of unknown people who according to her words had attacked them and burnt the camp', said Yulia, patrol police officer. 'The woman showed direction where they had run. Officers found four cases in the camp looking like cartridges for rubber bullets. They searched the territory around and found twelve people in Mikulinetskaya Street. Police officers asked them to go to police station. Under-aged were ong them'³⁶.

According to victims, the camp was attacked by about 15 people. Ludmila Denisova, Human Rights Commissioner of the Ukrainian Parliament, wrote on her website that 'seven adults and over 30 children were in the camp at the moment of the attack.'³⁷ What is more, news service of 1+1 TV channel reports that only three of Roma adults were men, they did not run away and resisted to the attackers. While protecting, one of the defenders got several hits by stick on his back, as police say. On the whole, the attack was very quick and no one was seriously injured. Nevertheless, police officers say that the attackers used guns. National police in Ternopil have published photos from the crime scene with cartridges from traumatic guns.

According to report of 1+1 channel, 'all three tents of the camp in the forest were burnt down.'³⁸

³⁶ Post in account of user «Патрульна поліція Тернопільської області» (Patrol Police of Ternopil Region) on Facebook. 23.05.2018. URL: <https://www.facebook.com/ternopilpolice/photos/a.202813066754404.1073741828.201918403510537/587593998276307/>

³⁷ Ludmila Denisova initiated legal process after attack on Roma camp in Ternopil Region// Huan Rights Ombudsman of Ukrainian Parliament website. 23.05.2018. URL: <http://www.ombudsman.gov.ua/ua/all-news/pr/23518-fo-lyudmila-denisova-vidkrila-provadhennya-za-faktom-napadu-na-romskij-t/>

³⁸ Members of Right Sector can be among attackers on the Roma camp in Ternopil Region // News TV Service of 1+1 Channel website. 23.05.2018. URL: <https://tsn.ua/video/video-novini/sered-napadnikiv-na-tabir-romiv-na-ternopilschini-mozhut-but-i-chleni-pravogo-sektoru.html?ga=2.66510958.1560650183.1533312352.574868599.1504110919>

The report of 1+1 channel also announced on the same day that at least of part of the attackers were members of the Right Sector. On June 22 2018, District court of the city of Ternopil held sitting because of arrest of one of probable attackers Pavel Grivnyak, who was also a member of the Right Sector. Three Roma recognised him as one of the shooters who also shot into them. However, as the court yard was crowded with nationalists of the Right Sector, Trizub of Stepan Bandera and Sokol (youth group of Svoboda Party) claiming that the court was trying to defame nationalists in front of the society. Consequently, the judge denied to put Grivnyak even under house arrest'³⁹.

³⁹ Nationalists are accused of shooting in Romani camp in Ternopil Region // Ternopil city website. 23.06.2018. URL: <https://www.0352.ua/news/2078084-Right-Sector-activist-arrested-for-attack-on-Romani-camp-in-Ternopil//Zaxid.net.24.06.2018>. URL: https://zaxid.net/aktivistapravogo-sektoru_sudyat_u_ternopolii_cherez_napad_na_romskiy_tabir_n1459955

Pogrom of Camp in Holoseevsky Park (Kiev, June 7 2018)

In the afternoon June 7, National Squads (Druzhyny), which is a military formation established by far-right National Corpus Party, damaged a Romani camp situated in a forest in Holoseevsky District of Kiev.

Earlier in the morning of the same day coordinator of C14(Neo-Nazi band having damaged Romani camp at Lysaya Gora in Kiev on April 20, 2018). Evgen Karas published photos of Roma illegally built houses in Holoseevsky forest on Facebook and captured the photos with a text hinting on future actions: 'Our forests are trampled and we could do nothing, police stay aside.'⁴⁰

About 1 pm a post was published on page of the National Squads on Facebook, 'Gypsies have occupied Holoseevsky Park. When police fail to fulfill their duties, National Squads take situation under control. We give you 24 hours to leave the territory and clean it from all garbage, otherwise we will come for a clean-up in Holoseevsky Park. (It should be reminded that previously, Krishchenko, head of the National Police in Kiev called burning a Romani camp at Lysaya Gora in Kiev a 'clean up for disposing litter.'⁴¹)

In the afternoon June 7, National Squads published a video on its page on Facebook (it was deleted in a few hours, however it was shared by viewers in YouTube⁴¹), showing over a dozen members of the organisation members wearing T-shirts with its name on the back, walking through a forest and carrying heavy axes and hammers. They were ac-



"National Druzhina" fighters during the pogrom of Roma camp in Goloseevsky Park (Kiev, June 7th, 2018)

⁴⁰ The post is currently deleted in Karas account. Cited by: *Vladislav Maltsev*. Pogrom tured into manufacture // ukraina.ru. 08.06.2018. URL: <https://ukraina.ru/exclusive/20180608/1020461760.html>

⁴¹ Members of National Squads damage Romani camp in Holoseevsky Park — video Kyiv LIVE // Channel of «120» user in YouTube. 29.04.2018. URL: <https://www.youtube.com/watch?v=APw2BNu14mk>

accompanied by a person wearing a uniform of forest keeping service. Later, Sergey Filimonov, head of Kiev branch of the National Corpus, told Ukrainskaya Pravda Newspaper that 'all in all, we were 19 people'.⁴²

Video-operator of National Squads recorded strong young men come into the settlement and start ruining the houses with happy shouts. 'Go, go guys,' shouts the operator to them. And adds, 'No more camps here from today. We will put it in Ukrainian order. Make kebab.'

National Squads fighters show up in the photo smiling with their axes and hammers up. The photos were later uploaded to the page of National Squads in Instagram with a capture, 'How is the clean up in Holoseevsky Park going? Today #National Squads have cleaned up the park of litter'.⁴³

According to the video, by the end of the pogrom a municipal bulldozer and several officers of the National Police in body armours arrived to the scene. However law enforcement agents did not stop actions of the nationalists.

A criminal case because of the pogrom of the camp has not been launched; far-right radicals who damaged the Romani settlement with xenophobic slogans bore no responsibility.

⁴² National Squads with axes and hammers held 'clean-up' in Romani camp in Kiev// Ukrainska Pravda. 07.06.2018. URL: <https://www.pravda.com.ua/news/2018/06/7/7182669/>

⁴³ Photo in «ndrugua» account in Instagram. 07.06.2018. URL: URL: <https://www.instagram.com/p/BjukTAqA1oh/>

Attacks near Yuzhny Railway Terminal (Kiev, June 11 2018)

In the evening June 11, a group of young far-right radicals attacked a Romani camp located near the Kiev Central Railway Terminal.

These vents were covered in mass media in a very specific way from the very beginning. Kiev resident Yulia Popova wrote on her page on Facebook on June 12, 'Yesterday evening, my younger son and his friends walked near the Ultramarine railway terminal. They saw a crowd of Roma running to them. They were scared and ran away. My son was running the last one. A bottle got into his head. He fell and lost consciousness. He got back into his sense in a pool of blood and saw a skinny Roma standing over him. The Roma asked, 'Are you one of them?' 'Please call for a doctor,' asked my son and got another hit with a bottle.'⁴⁴

A Kiev journalist of ukraina.ru website talked to beggar Mikhail living on the square near Ultramarine and found out details of the incident. '— Tell us what happened.

— The Roma were sitting quietly in the park, when some youngsters came, probably, they were from the Right Sector, and started shouting. 'All for one!' 'Beat Roma!' I asked what had happened. And they said, 'A gypsy attacked one of us and wounded him into head.' I suggested that they should settle it calmly but they did not listen to me and threw a smoke box into a tent with children and then turned it upside down. Children in the tent could hardly breathe. I told them, 'Guys, there is a nearly new born baby inside of the tent, it's only one year old. Are you heartless?' They answered, 'We don't care a damn, we have an order.'

— And what happened when the Roma injured head of that boy?

⁴⁴ A post in Yulia Popova's account («Юлия Попова») on Facebook. 12.06.2018. URL: https://www.facebook.com/permalink.php?story_fbid=1746517718750047&id=100001755080214



"Trouble company" fans grouping
(Kiev, May 26th, 2018)

— When the youngsters attacked them for the first time, they beat everyone they could find, thus, the old, children and women. So they tried to protect themselves. A Roma took a bottle and hurled it into one of the youngsters.

— So he attacked him for a reason?

— Yes, of course. Roma are a bit cowards they typically do not attack you without groundlessly.

Another eye-witness, Zempfira, who is also a Roma but who separates herself from Magyar (Hungarian Romani) camp, told ukraina.ru pabout the same attack:

'At night, I went to sleep under a church when they came. They wanted to beat me too, but I told them that I was not a Magyar, so not with those Hungarians. They were sitting here in the park when those youngsters ran up here and started to beat them with bottles. In fact, it all started with a Magyar-woman went to buy her coffee to a vendor. The youngsters fastened on her and ran behind her. She ran to her people and then it all started. The Magyars left all their belongings and rushed to the railway terminal. Those people were looking for them for the whole night and asked me where they were. I said that I didn't know. Well, they burnt all their belongings, you can still see ash there on the stairs. There were also two small children there, but luckily they managed to run away with their parents. And only than a Roma attacked that guy and hit his head.

— So they had a reason to beat that guy?

— Yes, I saw that they were first to attack Romani with my own eyes⁴⁵.

Yulia Popova admitted the same as she wrote on Facebook on June 17, 'Are you *one of them*?' This question seemed me strange in this context. *One of them* means here one of Trouble Company far-right radical band, a group of radical fans formed by TSSKA football team who were attacking Romani at the same time. It was 'they' whom Romani took the young people for. It is they who have made a band to injure themselves and people around and who are guilty of the fact that my son nearly died. I asked them if they were ready to take responsibility for it and they answered, 'It only seemed to you'. Their Instagram was deleted

⁴⁵ *Brima Voystok*. 'They beat randomly both children and women: one more unnoticed pogrom of Romani in Kiev' // ukraina.ru. 01.07.2018. URL: <https://ukraina.ru/exclusive/20180701/1020548130.html>

and the topic was also deleted from Los Solomas group. Fans can beat women and children of any nationality, but they evidently cannot bear responsibility for consequences of their Nazi actions.⁷

Popova says that she has this information from investigators dealing with the attack on her son. 'The thing is that there were two different groups in that area at the same time. First one comprised 15 boys including my son going from a birthday party. The other one consisted of 22 football fans. Both groups had missiles'⁴⁶.

This assault was also mentioned in a report issued by Ukrainian 24 Channel on June 13. It says that Roma who had been banished from their illegal settlement in Holosevsky Park by National Squads joined a camp on Volkainaya Square. 'Thus, Vasily and his friends moved from the forest to the square in front of the railway terminal... There they were living without roofs until unknown people came... Now, Holossevsky Roma are hiding. According to Vasily, his family and friends were chased through the square by unknown young people with sticks. Around a hundred Romani ran away and some of them spent a night in police stations to protect themselves from the attackers.'⁴⁷

Hence, we see that in the evening on June 11, a group of 22 far-right football fans assaulted a Romani camp using sticks (or bats), missiles and glass bottles. While protecting themselves, one of Roma threw a bottle and wounded a member of another youth group passing by (who also held burning missiles, what is more, Popova's son and his friends were very similar to football fans as they were fit, wore typical clothes and had shaved heads⁴⁸). Judging by words of the beggar, then the group of right football fans whose member was Andrey Fenechko, Popova's son, attacked Romani.

⁴⁶ A post in Yulia Popova's account («Юлия Попова») on Facebook . 17.06.2018. URL: https://www.facebook.com/permalink.php?story_fbid=1752925171442635&id=100001755080214

⁴⁷ How Roma have to hide from attackers and how their problem can be solved: incident details // 24 Channel. 13.06.2018. URL: https://24tv.ua/ru/kak_romy_vynuzhdeny_prijatatsja_ot_napadajushihh_i_kak_reshit_ih_problemu_detaili_incidentu_n982932

⁴⁸ Several dozens of Roma attacked schoolboy in Kiev // «Телеканал ZIK» (ZIK TV Channel) channel in YouTube. 13.06.2018. URL: <https://www.youtube.com/watch?v=MSRbpXFMfQ8>

Attack on camp near Akademorodok underground station (Kiev, June 25 2018)

On June 25, 2018, Nemezida Neo-Nazi organisation published a post in its Telegram channel informing about a new attack on Romani in Kiev. 'Our activists have recently visited one another Roma camp in a forest near Akademorodok underground station counting over twenty Gypsy hovels because of complaints of local residents. These animals turned that place into a dump and a crack house... We decided to pay the Gypsies warning visit during which we 'treated' them with bursting and burning presents. During the visit we managed to frighten the pests and destroy several tents... Unfortunately, because of a problem with the camera and the law we can publish only a short fragment of the video showing our activists 'treating' Gypsies with bursting presents. However, without the camera, we managed to get to the very heart of the camp and burn some more tents, treating the riff-raff with laughing gas.'⁴⁹

Then a video was published, the record shows the attack (six young people filmed from the back go through the forest and throw something, than a typical burst can be heard.⁵⁰ The page also contains photos of bottle full of incendiary liquid as a crime instrument. The bottles were tied with mighty detonator K22 Viper (containing 2 grams of powder) with a wick setting on fire. They also framed a glass jar with



Self-made shells with killing elements, used by neo-Nazis during the attack on Roma camp by Akademorodok (Kiev, June 25th, 2018)

⁴⁹ Post in Nemezida Organisation Channel in Telegram. 25.06.2018. URL: https://t.me/nemezida_ua/148

⁵⁰ Post in Nemezida Organisation Channel in Telegram. 25.06.2018. URL: https://t.me/nemezida_ua/149

still bearings and big metal bolts and a similar mighty detonator with wick attached to it⁵¹.

'Attack on Romani near Akademgorodok underground station is confirmed,' wrote journalist Margarita Bondar on Facebook on July 25 who deals with attacks of right-wing radicals on Romani. 'When I wrote to Romani human rights activists, they answered that they got no information about it. Right now three people having suffered the attack are questioned now. Romani say that nobody from Roma organisations came to them. And now I really have a lot of questions to human rights advocates. Have you tried coming out of offices?'⁵².

Police preferred to ignore one more attack of Neo-Nazis from Nemezida committed with deliberate intention to cause grievous bodily harm or murder. The lack of investigation of April arson in Rusanovskiye Sady evidently let right-wing radicals feel permissiveness. 'They can not stop us,' said members of the organisation about actions of human right activists and journalists after attacks on Romani on June 25. 'It's not the end. It's only beginning.'⁵³

⁵¹ Post in Nemezida Organisation Channel in Telegram. 25.06.2018. URL: https://t.me/nemezida_ua/150

⁵² Post in Rita Bondar account on Facebook. 25.07.2018. URL: https://www.facebook.com/permalink.php?story_fbid=1866773676960845&id=10000846922783

⁵³ Post in Nemezida Organisation Channel in Telegram.. 25.06.2018. URL: https://t.me/nemezida_ua/153

Attack on camp in Lviv (June 23 2018)

Overnight into June 24 2018, a Romani camp located near the village of Sokolniky of Pustomytsky district in the suburbs of Lviv was assaulted. Ten adults and four children were in the camp at the moment of the attack.

'On June 23, at 23:25, police got a phone call informing that a group of unknown people in masks has assaulted a camp inhabited by Romani in a forest in the outskirts of Lviv,' says the page of Chief Department of the National Police in the Lviv Region on Facebook. 'An investigation group, other services and departments of the Lviv Region immediately headed to the scene... Lviv police officers detained seven people suspected of attack of the Romani camp. One person was killed and four more were injured during the attack.'⁵⁴ It was later announced that police identified 14 people who assaulted the camp, some of them were under-aged⁵⁵.

'Investigation has ascertained that a group of young people armed with objects aimed specially at injuring people (knives, metal tubes and chains) committed an attack on the camp where Romani temporarily lived,' Prosecutor's office of the Lviv Region reported on June 24⁵⁶.

⁵⁴ A post in account of «Толовне управління Національної поліції у Львівській області» (Chief Department of National Police in Lviv Region) on Facebook. 24.06.2018. URL: <https://www.facebook.com/MVS.LVIV/posts/2517335904973466>

⁵⁵ Attack on Romani camp in Lviv Region: three of eight suspects still behind bars (video) // UNIAN. 06.07.2018. URL: <https://www.unian.net/incidents/10177601-napadenie-na-lager-romov-vo-lvove-troc-iz-vosmeryh-podozrevaemyh-ostanutsya-za-reshetkoy-video.html>

⁵⁶ Suspects of pogrom of Romani camp in Lviv Region are charged of a murder // Lviv Region prosecutor's office. 24.06.2018. URL: https://lviv.gp.gov.ua/ua/news.html?_m=publishations&_c=view&_t=rec&id=231872



The Roma wounded with a knife during the neo-Nazi attack on the camp in Lviv
(June 23rd, 2018)

Unlike previous attacks, here people were killed (the attackers stabbed 24-year-old David Pop, a resident of Rovnoye village in the Transcarpathian Region) and savagely wounded (19-year-old Rach Pop was taken to hospital with four stab wounds of the back and one stab wound of his arm, while a 30-year-old woman and a 10-year-old boy got medical aid without hospitalisation).

'The killed man was stabbed with knives by a group with a definite intention to kill him. A mother was stabbed because she tried to protect her 10-year-old child,' said Andrey Sadovoy, Lviv Mayor, on Facebook⁵⁷. 'They stabbed us with knives. They had knives, hammers, every-thing. They cried, 'We'll kill you, damn Gypsies,' Pach Pop, who was wounded into back and arm, told journalists⁵⁸. In the interview to Strana Journal he described the night attack with more details: 'We were sleeping, then we woke up because of terrible screams. It happened so rapidly. About ten men in masks assaulted us, they brought axes, bats, hammers with them and were destroying everything around⁵⁹, they hit men, pregnant women and children. They did it randomly. They shouted 'We'll kill you, damn Gypsies.' One of them stabbed me into my back several times and then cut my arm.' His brother David Pop was killed by the attackers, they wounded him all in all 15 knife wounds. 'They ripped him. Forced a knife into his stomach and pulled it up, so all the guts were out.'⁶⁰

Miroslav Gorvat, a member of Uzhorod City Council, told Strana Journal on June 28, 'Today, I... met a ten-year-old boy who had got stab wounds during the attack. He got stitches in hospital. I saw his wounds

⁵⁷ A post in account of Andrey Sadovoy («Андрій Садовий») on Facebook. 24.06.2018. URL: <https://www.facebook.com/andriy.sadovyi/posts/1847832698589610>

⁵⁸ Injured Roma from Lviv told about his brother's murder// 1+1 Channel New TV service website. 24.06.2018. URL: <https://tsn.ua/ukrayina/poranienyi-lvivskiy-rom-rozpoviv-yak-vbili-yogo-brata-1176672.html?ga=2.25701245.1560650183.1533312352.574868599.1504110919>

⁵⁹ Ax found at attack scene indeed, read: 'They shouted 'Get away!' Who attacked Romani camp in Lviv // Nastoyashcheye Vremya. 25.06.2018. URL: <https://www.currenttime.tv/a/29318521.html>

⁶⁰ Aleksandra Kharchenko. 'Polite children'. What teachers and classmates say about Neo-Nazi making pogrom in Lviv // Strana. 26.06.2018. URL: <https://strana.ua/articles/148596-kto-takie-shkolniki-pobromshchiki-laherija-romov-vo-lvove-.htm>

and was shocked, the stitches were 10-12 centimeter long each! What were those radicals armed with?⁶¹

Oksana Sanagurskaya, Senior Inspector of Human Rights Department of the National Police of Ukraine, told Hromadske TV channel on June 24 that the arrested declare their membership in Sober and Angry Youth⁶². Judging by the day of launching a Telegram channel (containing quotes and portraits of Adolf Hitler⁶³), the organisation was set up in April 2018. One their channel in YouTube launched in June 2018, Neo-Nazis posted a video called 'Short video report from Roma safari' with scenes of attack on the camp⁶⁴.

At the same time, judging by photos in social networks and Telegram, members of the group used symbols of Misanthropic Division Neo-Nazi. It is known that since 2014, members of Misanthropic Division have fought in the anti-terror operation in Azov battalion (later transformed into a regiment). Thus, it is interesting to mention that after suspects of attack on the camp in Lviv were detained, Neo-Nazi launched crowd funding through Telegram in favour of 'guys' who were 'detained for the action against Roma'. They gave bank details of Yury Tabaka, a 24-year-old Lviv resident, who had previously fought in Azov battalion in 2014-2015⁶⁵. On June 26, Antinazi Channel Telegram-channel reported

⁶¹ Inna Zolo. 'Planning to leave Ukraine'. What Romani say after pogroms// Strana. 28.06.2018. URL: <https://strana.ua/articles/istorii/148968-8-ijun-ja-pokhoronili-davida-popa-zhertvu-naletchikov-na-romskij-tabor-vo-lvove.html>

⁶² Maria Leonova, Ostrap Yurish. Suspects of attack on Romani call themselves members of Sober and Angry Youth band // Hromadske. 24.06.2018. URL: <https://hromadske.ua/posts/pidozrivani-u-napadi-na-romiv-vyznaly-sebe-chlenamy-uhrupovannia-tvereza-i-zla-molod>

⁶³ Nazary Tuzyak. What is Sober and Angry Youth and what does it have to do with Neo-Nazi// Zaxid.net. 24.06.2018. URL: https://zaxid.net/shho_vidomo_na_pidozryuvanih_u_napadi_na_romskiy_tabor_u_lvovi_n1459950

⁶⁴ Night massacre. School children against Romani (in Lviv/ Korrespondent.net. 25.06.2018. URL: <https://korrespondent.net/ukraine/3983934-noch-naia-reznia-shkolnyky-protyv-romov-vo-lvove>

⁶⁵ Aleksandra Kharchenko. 'Polite children'. What teachers and classmates say about Neo-Nazi making pogrom in Lviv // Strana 26.06.2018. URL: <https://strana.ua/articles/148596-kto-takie-shkolniki-pobromshchiki-laherija-romov-vo-lvove-.htm>

that one of the attackers was a member of far-right National Corpus party established by members of Azov⁶⁶.

Strana's sources among Lviv anti-fascists report that members of Sober and Angry Youth are well-known in their attacks on their political opponents with knives. The youngsters who demolished the camp were hunting for them for a long time. Once they ripped a boy but he was lucky to stay alive. They say, uniformed services used them to sabotage various events and for attacks.⁶⁷

'It was a planned operation consisting of not only those terrible Saturday night events,' stressed Iosif Rezhesh, Chief of the Ethnic and Religious Department of the Transcarpathian Region, on June 25. 'Saturday massacre was a culmination point of the events which were lasting for months. I mean attacks in Odessa, Kiev, Lviv, Ternopil... The only thing is that there haven't been murders there yet, but now there is.'⁶⁸

Amnesty International Ukraine also pointed at little reaction from law enforcement bodies on June 27. 'Years 2017 and 2018 saw a sharp rise of violence rate in Ukraine, members of radical groups commit more crimes...

The majority of crimes committed by radical groups were not properly investigated by the law enforcement bodies who do not want or cannot provide effective investigations even when some bands publicly recognize responsibility for their crimes... None Ukrainian official has publicly condemned a burst of violence of far-right radical bands.'⁶⁹

⁶⁶ Post in «Antinazi Channel» in Telegram. 26.06.2018. URL: <https://t.me/antifa.ua/761>

⁶⁷ *Aleksandra Kharchenko*. 'Polite children'. What teachers and classmates say about Neo-Nazi making pogrom in Lviv // Strana 26.06.2018. URL: <https://strana.ua/articles/148596-kto-takie-shkolniki-pohromshchiki-laherja-romov-vo-lvove-.html>

⁶⁸ *Aleksandra Kharchenko*. 'Polite children'. What teachers and classmates say about Neo-Nazi making pogrom in Lviv // Strana 26.06.2018. URL: <https://strana.ua/articles/148596-kto-takie-shkolniki-pohromshchiki-laherja-romov-vo-lvove-.html>

⁶⁹ Ukrainian authorities must take urgent measures and hold to account pogrom-makers and murderers of Roma in Lviv// Amnesty International Ukraine. 27.06.2018. URL: <http://amnesty.org.ua/nws/vlada-ukrayini-povinna-negajno-vzhiti-zahodiv-shhob-prityagti-do-vidpovidalnosti-pogromnikov-ta-vbivtsi-molodogo-roma-u-lvovi/>

This time, Ukrainian Neo-Nazis could not enjoy impunity because of abrupt response of the West. The response, abroad was significant. The UN issued a statement, some diplomats, embassies and politicians made declarations. A number of international organisations, in particular Amnesty International, applied to [Minister of Internal Affairs] Avakov demanding investigation of recent attack on Romani. The world sees what is going on in Ukraine,' said Maria Guryeva, press-secretary of Amnesty International Ukraine, in the interview to Pryano TV channel on June 25⁷⁰.

'We condemn another attack on #Roma people, as reported by police today. We are horrified this time one person was killed. We expect a full and transparent investigation without delay,' wrote Daniel Holtgen, Director of Communications at the Council of Europe, Spokesperson of Secretary General, on June 24⁷¹.

'The PACE President Michele Nicoletti expressed his shock and dismay strongly condemning what appeared to be "a racist attack." , — says website of the Parliamentary Assembly of the Council of Europe on June 25. 'He expressed his condolences to the family and friends of the victim. The President urged the authorities to set a clear signal that there is no impunity for such hideous violence against Roma people.'⁷²

'I urge the Ukrainian authorities to step up their efforts to stop these attacks and prosecute those responsible. Saturday's attack is just the latest of several violent raids by radical groups against Roma and human rights defenders in Ukraine in the last two months,' wrote Dunja Mijatović, Council of Europe Commissioner for Human Rights, on her official page on Facebook on June 25⁷³.

⁷⁰ B *Amnesty International* tells about international reaction on attack on Romani in Ukraine // Pryamo TV Channel. 25.06.2018. URL: <https://pr.ua/ru/v-amnesty-international-rasskazali-o-mezhdunarodnoy-reaktsii-na-napadeniya-romov-v-ukraine/>

⁷¹ A post in «Daniel Holtgen» account in Twitter. 24.06.2018. URL: <https://twitter.com/CoESpokesperson/status/1010868685446307840>

⁷² President condemns attack against a Roma community in Ukraine // Parliamentary Assembly of the Council of Europe. 25.06.2018. URL: <http://assembly.coe.int/nw/xml/News/News-View-EN.asp?newsid=7122&lang=2&cat=15>

⁷³ A post in «Council of Europe Commissioner for Human Rights» account on Facebook. 25.06.2018. URL: <https://www.facebook.com/CommissionerHR/posts/1010901069085803>



"Misanthropic Division" ("Azov" regiment) far-right grouping fighters (Ukraine, 2015)

Murder in Beregovo (July 1 2018)

'Today, a local Romani woman was deadly wounded with a knife in Transcarpathian city of Beregovo at the premises of railway depot. The injured woman ran away from her attackers and came up to a local resident where she died from her wound', reported Novosty Zakarpattia online resource on late evening July 1. 'The woman was around 30 years old. According to locals, some stranger tried to kill the woman.'⁸⁰

The Chief Department of the National Police in the Transcarpathian Region officially confirmed early in the morning on July 2, 'Yesterday, on July 1, we got a call by number 102 about a woman who lost consciousness in one of Beregovo streets. She had been taken to hospital before police arrived, however, doctors failed to save her life. The 30-year-old female resident of Beregovo had stab wounds on her neck. Following the fact, police has started a criminal proceeding under Rule 115, part 1 of the Criminal Code of Ukraine, which is Deliberate Murder. At the same time, though police could not investigate the case properly in such a short period and reported only that they were 'identifying people linked to the murder of a young woman in Beregovo', police has already

⁸⁰ Somebody wounded mortally local Romani woman with a knife in Beregovo // Noviny Zakarpattya. 01.07.2018. URL: <http://transkarpatia.net/transcarpathia/hot-news/99331-v-beregov-nevdom-nozhem-smertelno-poraniili-mscevu-romku.html>

announced that they did not 'find any motives of the murder related to gender, race or other forms of discrimination'⁸¹.

The Transcarpathian State Regional Administration took similar position at once. 'We don not have any grounds to think that this murder can be explained with race reasons... Police considers that this case is not connected with anti-Romani moods', Yaroslav Galas, Information Activity and Public Relations Department of the Regional Administration Director, told Obozrevatel online source.

From all appearances, officials and uniformed services try not to 'spoil statistics' and 'not to compromise image of Ukraine at the international arena after abrupt response of the West to the attack on the Romani camp in Lviv. Now they try to present all new attacks of Romani as domestic crimes or directly accuse Romani of them. 'It's unofficial statistics, but 99% of crime are their internal showdowns,' said Galas to journalists. 'She was going from one camp to another but while the case is not solved, nothing can be said for sure.'⁸²

'Nevertheless, Romani themselves do not believe this version at all. They claim that this murder was committed because of national hatred. This is what Rada of Transcarpatian Romani social association told Fakty', wrote Fakty on July 2. 'The murder of the young woman in Beregovo in the face of the day is not a sudden accident, it is a display of racial hatred a wave of which swept the entire country. First it was Kiev, then that terrible case in Lviv and not it is the Transcarpathian Region,' says the Association. They also added that they would follow the investigation.'⁸³

Miroslav Gorvat, a member of Uzhgorod City Council who also heads Uzhgorod Romani Association, told journalists on July 3 that

⁸¹ Police of Transcarpathian region investigates murder of Romani woman in Beregovo // National Police of the Transcarpathian region. 02.07.2018. URL: <https://zk.npu.gov.ua/news/informacziya/policziya-zakarpattya-rozsliduje-vbivstvo-zhinki-u-beregovi/>

⁸² 'They did not want to kill: Moskal explains why Romani woman was violently stabbed to death // Obozrevatel. 02.07.2018. URL: <https://www.obozrevatel.com/society/mezhnatsionalkaya-vrazhda-u-moskaliya-rasskazali-za-cto-byila-ubita-romka.htm>

⁸³ Details of murder of 30-year-old Romani woman in the Transcarpathian Region // Fakty. 02.07.2018. URL: <http://fakty.ua/273781-stali-izvestny-podrobnosti-ubijstva-30-letnej-cyganki-v-zakarpate>

police had immediately strengthened security of Romani camps in the Transcarpathian Region also meant that the attack was committed by non-Romani people.⁸⁴

The criminals has not been identified yet and have yet to be kept to account.

⁸⁴ *Pavlo Kalashnikov*. Leader of Uzhgorod Romani Association: Police intensifies security of Romani after lethal attack in Lviv // Hromadske. 03.07.2018. URL: <https://hromadske.ua/posts/politsiia-posylila-zakhystry-romiv-pisilia-smertelnoho-napadu-u-lvovi-holova-obiednannia-romiv-uzhhoroda>

Popular-science edition

**FROM POGROMS TO MURDERS:
UNPUNISHED VIOLENCE FROM THE SIDE
OF RIGHT-WING ACTIVISTS AGAINST ROMA IN UKRAINE
INTERREGIONAL MOVEMENT "FOR THE DEMOCRACY
AND HUMAN RIGHTS" REPORT**

Edited by *A. Dyukov, M. Vilkov.*

Arts Editor *M. Levykin*

Computer Layout *R. Fahrutdinov*

Corrector *D. Melnik*

Interregional movement "For the Democracy and Human Rights"

"Historical Memory" Foundation Publishing

5/6-9, Volkhonka, 77, Moscow, 119019, Russian Federation

Starting from the spring of 2018, there have been registered numerous attacks on Roma camps in Ukraine. These attacks have been organized by the members of pro-State neo-Nazi groups, such as C14 and “National Druzhina”. Ukrainian government demonstrates reluctance to counteract the violence against Roma people from the side of “patriotic” right-wing activists.

The information on the attacks on Roma people committed by Ukrainian neo-Nazis in April-July 2018 is systematized in this report.

Annex 40

S. Vnukov, O. Sharov, CRIMEA - TAURIDA. ARCHAEOLOGICAL RESEARCH IN CRIMEA IN 2017-2018 (Institute of Archeology RAS, 2019, Vol. 1)

(excerpt, translation)

**Excerpts
Translation**

S. Vnukov, O. Sharov, CRIMEA - TAURIDA. ARCHAEOLOGICAL RESEARCH IN CRIMEA IN 2017-2018 (Institute of Archeology RAS, 2019, Vol. 1), p. 63.

Institute of Archaeology, Russian Academy of Sciences

To the 100th anniversary of Russian academic archaeology

CRIMEA — TAURIDA

Archaeological research in Crimea
in 2017-2018

Volume I

Moscow
2019

UDC 902/904
BBK 63.4
K 85

Approved for publication by the Scientific Council of the Institute of Archaeology, Russian Academy of Sciences

Editors-in-chief

Doctor of History *C. Y. Vnukov*

Doctor of History. *O. V. Sharov*

Reviewers

Doctor of History *A. A. Maslennikov*

Ph.D. in History *A. V. Engovatova*

к 85 Crimea — Taurida. Archaeological research in Crimea in 2017-2018 in 2vol. — M.: IA RAS, 2019. — Vol. 1. — 420 p.

ISBN 978-5-94375-269-8

DOI: 10.25681/IARAS.2019.978-5-94375-269-8

The collection includes articles presenting the most interesting preliminary results of the new construction excavations in the Crimea in 2017-2018. The Crimean new construction archaeological expedition of the IA RAS at the end of 2018 completed field research on objects under construction of the "Taurida" highway (Kerch - Simferopol - Sevastopol) and on the road and railroad access roads to the Crimean bridge. Among the studied monuments of different cultural affiliation and dating there are settlements, villages and camps, mounds and burial grounds, ancient defensive and architectural constructions. The archaeological excavation of each monument was determined by the need to study them as thoroughly as possible before the beginning of the construction works. This publication introduces into science the latest archaeological discoveries made during the rescue excavations made by the Institute of Archaeology of the Russian Academy of Sciences in the Crimea. The publication is intended for archaeologists, historians and all those interested in the history and archaeology of ancient Taurida.

**UDC 902/904
BBK 63.4**

© Federal State Budgetary Scientific Institution Institute of Archaeology, Russian Academy of Sciences, 2019

© Authors of articles, 2019

DOI: 10.25681/IARAS.2019.978-5-94375-269-8.63-73

Research on the settlement of Hospital 1 in Kerch

I. V. Rukavishnikova, N. D. Dvurechenskaya, O. V. Dvurechensky, A. V. Alekseev
(IA RAS, MOSCOW)

N. F. Fedoseev (t)
(IAC RAS, Simferopol)

The settlement Hospital 1 is located within the administrative boundaries of Kerch in 0.15-0.25 km to the south-west of Nizhny Solnechny microdistrict. From the west it adjoins the road connecting the central district of Kerch with Arshintsevo district (Geroyev Stalingrada ave.). At 0.03 km to the east-southeast of it is the Gospitalny barrow (second half of the IV century BC).

The settlement of Hospital 1 occupied the top and slopes of a small gently sloping hill on the right bank of the Djordjava River. It was dammed in the twentieth century and the pond has now effectively ceased to exist. The settlement stretches along a long axis from south-west to north-east. Originally a larger area, its eastern part was destroyed by road construction. The central and especially

the northern parts have been affected by the construction of numerous communications lines.

It was discovered in 1989 by N.F. Fedoseyev, who supervised the rescue excavations for the road under construction in 1989, 1990 and 1992. In the area investigated by N.F. Fedoseev, of about 3000 sq. m. they discovered five building complexes, among which there were half-houses for household purposes with sewage drains running along the hillside ending in a waste pit. In addition, about a dozen household pits were examined and the remains of a stone building were found on the southern slope of the hill. Terracottas are an interesting find,

Fig. 1. Panoramic image from a quadcopter of the 2017 excavation at Hospital 1 (V.V. Frolov)

as well as red-figure pottery, graffiti, including a dedication to Zeus the Saviour, and plaques in the animalistic style. The date of the monument is dated to the second half of the IV century BC (Fedoseev, 1991; 1994).

The total area of the monument, which was in the area of the ongoing construction and was subject to excavation and archaeological observation, was 10,715 sq. m. Excavations in the spring and summer of 2017, conducted by the KNAE IA RAS, revealed the remains of three stone buildings of various purposes, as well as seven utility pits (Fig. 1; 2).

The cultural layer of the Hospital settlement had a two-part structure. The upper horizon 1 was a well sodded, homogeneous, humusified loam of varying degrees. Horizon 2 was a homogeneous, greyish-brown loam with a thickness of 0.1-0.3 m and was the upper soil layer.

All the mentioned objects have been identified in the process of dismantling of horizon 1 or at the level of clearing of the upper part of horizon 2. Most likely, the horizon 1 was formed in the process of ploughing up of the territory of the monument no later than the 60-70s of the 20th century.

The integrity of all three architectural constructions is fragmentary. The masonry as a rule survived not more than 3-4 rows above the level of the ancient daytime horizon. The building complex 1 is most interesting despite the fact that the greater part of it was destroyed by the section of the water supply trench.

Building complex 1 was a subrectangular building in plan from which the remains of foundation masonry (16,4 x 4,6-5,6 m), oriented by the long axis along the west-east line, are preserved. It was a three-part structure, sunk from the level of the daylight surface to 0.55 m in the west side and to 0.20 m in the east side, which is due to the general slope of the terrain to the east and north-east. Thus, the floor of the building was close to horizontal and had depth differences of no more than 0.1m (Fig. 3). The wall masonry, up to 0.5m in height, were preserved in two or three rows. The filling of the buried part represented rather homogeneous brownish grey ashy loam with numerous inclusions of charcoal, clay and abundance of ceramic fragments. In the bottom part, practically in the whole area there was a layer of organic sludge (brown sandy loam 1 to 5 cm thick) and ashy sub-layers. Most of the single stones and their accumulations in the upper filling horizon are associated with wall collapses and are concentrated in the southern part of the structure.

Fig. 2. Topographical plan of the 2017 mainland clearance of the Hospitaller 1 settlement

Annex 41

S. Kozlov, GRU SPETSNAZ: FIFTY YEARS OF HISTORY, TWENTY YEARS OF WAR (Russkaya Panorama Publishers, Essays on Contemporary History Series, 2003)

(excerpt, translation)

**Excerpt
Translation**

S.B. Kozlov, GRU SPETSNAZ: FIFTY YEARS OF HISTORY, TWENTY YEARS OF WAR (RUSSKAYA PANORAMA PUBLISHERS, ESSAYS ON CONTEMPORARY HISTORY SERIES, 2003).

Sergey Vladislavovich Kozlov

“GRU Spetsnaz: Fifty Years of History, Twenty Years of War”



[page 165]

Special Group

Alexander, as the most experienced specialist, received under his command the most efficient combat group. It did not include any Navy conscripts, as was the case in the other groups. Ten officers and midshipmen became simple scouts for the duration of the combat mission. No one knew the task itself, as Alexander’s group was at the direct disposal of the Commander of the Ukrainian Fleet. But, judging by whose disposal the group was at and who was part of it, it could be assumed that the task would not be easy.

The group was provided with weapons and ammunition in excess of any norm. Suffice it to say that the scouts had at their disposal one hundred and seventy-five kilos of TNT, a box of SZ-6 concentrated charges, a total of twelve KZ-5 and KZ-7 cumulative charges (*in the designation of a charge such as SZ-1e, for example, the number means the weight of the explosive in kilograms*), and a box of SPM magnetic mines.

The group included two snipers armed with SVD rifles. The other scouts were armed with 7.62-mm Kalashnikov (AKMS) assault rifles with silent and flameless firing devices (PBS-1). The group could fight effectively at night as each weapon was provided with a NSPU night sight device. Each member of the group, in addition to his main weapon, also had a silent Stechkin automatic pistol and a scout firing knife. With such weapons, the group could act silently. But in case they had to make some noise, they had two boxes of grenades and ten

RPG-22 grenade launchers. Every man was equipped with a bulletproof vest.

The group was located on the premises of the Ukrainian Fleet's HQ. The fact that this group was based in Sevastopol, unlike other groups demonstrating strength, was hidden in every possible way. All of them were dressed in civilian clothes. The access of scouts to the city was limited, and their identity documents were seized. In return, they were given cards stating that "the bearer takes part in exercises". Their documents, weapons and equipment are not subject to inspection. If necessary, the Command of the Armed Forces of Ukraine could easily abandon the special forces as these cards had no photos of their bearers. They could always say that the cards had been forged and the seal affixed thereto was lost three months ago and is currently invalid.

[...]

[pages 166-167]

According to Alexander's plan, each scout had his own specific task. Having carried off the sentries, an assault subgroup was expected to throw toxic-smoke grenades into armoured personnel carriers (APCs) and guard rooms. After the marines, shedding tears, left them, the scouts of the mining subgroup should install a medium sticky mine on the power compartment of each APC and mine the guard room's building with concentrated charges, setting fuses for a minimum period. That was to ensure the almost instantaneous detonation of the mines and charges after these were installed and the group withdrew. Further, under the cover of other scouts, the miners should install seven TNT boxes and the remaining charges in vulnerable places of the building and blow them up after retreating to the car waiting for them in a pre-agreed place.