

“The Pillage of Ukrainian Agricultural Assets: The Russian-Organized System of Agricultural Pillage in Occupied Luhansk Oblast, Ukraine”

A series of briefs with a regional perspective
(Kherson-Luhansk-Zaporizhzhia-Mykolaiv-Kharkiv-Crimea)
based on open source and field investigations
conducted by Project Expedite Justice (PEJ)



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1. INTRODUCTION

Since the start of Russia's full-scale invasion of Ukraine in February 2022, reports emerged about the pillaging and occupation of farms, agricultural products, and agribusinesses.¹ After failing to take Kyiv in April 2022, Russia occupied most of the territory of four oblasts:² Kherson, Zaporizhzhia, Donetsk, and Luhansk,³ in addition to Crimea, which had been occupied since 2014. During the early days of the occupation, Russian armed forces and paramilitary groups⁴ inspected and, sometimes, took over agricultural facilities, including those that stored grain and other products, vehicles, and valuable equipment.⁵ Soon after, the Russian occupying authorities began re-registering Ukrainian businesses in the Russian legal sphere and redistributing so-called “ownerless” businesses and their properties to Russian companies. This brief illustrates this pattern of appropriation and discusses its legal implications in the Luhansk Oblast.

Since early 2022, Project Expedite Justice (PEJ) has supported small-scale Ukrainian agrarian farmers and larger entities in their quest to document international crimes and harms and help them access accountability mechanisms. These acts include attacks against the civilian population, destruction of civilian property and infrastructure, pillaging, plunder of resources, improper mining, destruction of the environment, sanctions violations, and related issues. PEJ's Ukraine work centers on capacitation, investigations, and legal filings. Direct investigative activities and information collection support judicial cases and sanction submissions.

The present report focusing on the Luhansk Oblast is the third in a series of six reports,⁶ each detailing the timeline and *modus operandus* of the policy of pillage that Russian occupying authorities executed in Ukraine-occupied territories.

The Donbas region of Ukraine, encompassing the Luhansk and Donetsk oblasts, is known for its robust manufacturing industry and significant agricultural output. Until 2014, Luhansk had an agricultural production comparable to that of neighboring oblasts, but it declined that year after the separation of its southern region following Russian occupation (approximately 35% of the territory including Luhansk City, its capital).⁷ Ukraine's grain production decreased by about 21% following the occupation of most of Luhansk in 2022.⁸ Luhansk Oblast had the second-highest cropland abandonment rate in the country, contributing to about a third of the overall decrease in Ukraine's 2022 grain production.⁹ Between 2014 and 2022, 285,651 people (about 13% of the total population)¹⁰ were displaced from the separatist-controlled southern part of Luhansk.

Status of Ukrainian Areas under occupation by the Russian Federation since Autumn 2022 (as of December 31, 2023):¹¹



Creation Date: 13 March 2024 Source: OHCHR HRMMU

2. RUSSIAN PROPERTY SEIZURE IN LUHANSK

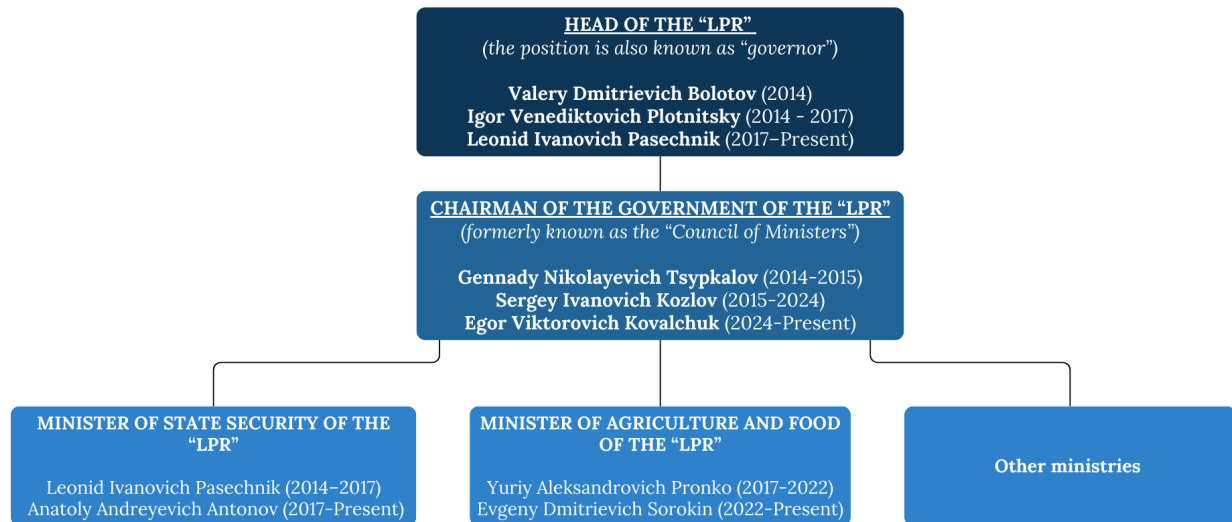
Russian authorities seized Ukrainian property in Luhansk in two waves. The first one from 2014-2022 following the Russian-backed separatists take over of Luhansk and the declaration of independence of the Luhansk People's Republic (LPR).¹² During this phase, the LPR authorities Russian proxies, nationalized Ukrainian public property through legislative and executive decisions. The second wave took place from September 2022 onwards, following the Russian full-scale invasion, occupation, and annexation of Luhansk. In the second wave, Russian authorities followed a similar approach as in other oblasts and directly appropriated Ukrainian private property. Like Zaporizhzhia, in Luhansk, the Russian occupying authorities seized the property via a seemingly "legal" procedure, placing it under Russian control by transferring it to the Russian property registry and subjecting it to Russian law. Then, a corporate structure is established comprising three Russian-controlled companies to collect and transfer Ukrainian grain to Russia.

Phase 1 (2014 - September 2022) - LPR Nationalization of Ukrainian Property

The first wave of Ukrainian property seizure in Luhansk began in November 2014 following the LPR's declaration of independence in April of that year. Russia recognized LPR's independence in 2022 and then annexed its territory.¹³

In November 2014, LPR began nationalizing Ukrainian property. On November 4, 2014,

the Luhansk People's Council, LPR's law-making body, passed a bill nationalizing all Ukrainian state-owned or "ownerless" property in LPR.¹⁴ Then, in 2018 and 2019, Sergey Kozlov ("KOZLOV"), LPR Chairman of the Government, declared numerous properties (state-owned and private) as ownerless, confiscated them, and transferred them into LPR state ownership.¹⁵



**Schematic representation of the LPR relevant occupying authorities in December 2024.¹⁶*

Following the Russian full-scale invasion on February 24, 2022, the LPR's People's Council passed Law № 402-III on August 4, 2022, granting the government discretion to transfer abandoned real estate to state property without defined criteria. On August 20, 2022, KOZLOV issued decree № 632/22 establishing the procedure for the transfer, including compensation for the owners.¹⁷ Under this procedure, LPR could nationalize properties if owners failed to pay housing and communal services under the LPR-imposed administrative regime for five or more years. Individuals who served in or supported the Ukrainian armed forces or who were facing war crimes charges before LPR or Russian courts were denied compensation.¹⁸

On September 28, 2022, a new law authorized nationalizing property owned by foreign States that commit "unfriendly" acts against the LPR or to individuals aligned or controlled by them, "regardless of their place of registration or place of predominant economic activity."¹⁹ The LPR could appropriate Ukrainian citizens' private property under this law. The law uses similar wording to a decree the occupying authorities issued in Kherson on the same day, showing the Russian pattern of seizing Ukrainian property.²⁰ These laws and decrees developed the legal architecture the LPR authorities progressively used to appropriate Ukrainian property. It began with appropriating public property and gradually expanded to appropriate private property under arbitrary criteria such as loyalty to Ukraine or lack of use.

On September 30, 2022, the LPR Government nationalized 17,849 private and public properties, including land plots, residential premises, and administrative buildings; and government properties, such as schools and hospitals.²¹ They also nationalized commercial enterprises, including agricultural entities.²² It is unclear whether real estate owners or owners who fled Ukraine can file for compensation. The LPR also looted apartments under the pretext of repairing them and then nationalized them.²³

Phase 2 - Russian direct seizure of Ukrainian property in Luhansk

On September 30, 2022, Russian Federation President Vladimir Putin announced the annexation of the LPR to Russia, following the signature of what they referred to as accession treaties.²⁴ The United Nations (UN) General Assembly found the attempted annexation illegal and called for its immediate reversal.²⁵ Thus, Luhansk Oblast was formally under occupation according to International Law. This led to the second wave of Ukrainian property appropriation. In this opportunity, the Russians directly appropriated the property in a similar pattern as in other oblasts.

The annexation placed Luhansk under Russian law, effectively suspending specific LPR laws, such as Law № 402-III mentioned above. Subsequently, in 2023 and 2024, Leonid Pasichnyk (“PASICHNYK”), a Ukrainian-born collaborator who served as “Head of the LPR” since 2017, issued laws and decrees on the State management (not ownership) of “ownerless” non-residential immovable property, movable property, and residential premises.²⁶

While the decree regarding non-residential immovable property addresses only management rights and does not imply full appropriation, it excludes properties already recognized as federal assets of the LPR—specifically, those in the list of 17,849 nationalized properties, including at least 273 agricultural entities. Consequently, the nationalization of these properties, which occurred just four days before the accession, was irreversible, with no opportunity for appeal.

This contrasts with the situation in Zaporizhzhia, where a post-accession decree required new occupation authorities to register previously declared ownerless properties with the federal land registry and, then after three months, petition the court for State ownership. This process allowed rightful owners a three-month window to appeal.²⁷ Therefore, Ukrainian owners expropriated by the LPR had no legal recourse to recover their property. No additional information has surfaced regarding recent expropriations of business properties since issuing the decrees mentioned above. Concerning residential property, the National Resistance Center (NRC) reported that recent legislative changes aim to transfer ownerless homes to security forces and migrants from Central Asia.²⁸

3. THE RUSSIAN TRANSFER OF UKRAINIAN EXTRACTIVE AND AGRICULTURAL COMPANIES TO EXTERNAL MANAGEMENT²⁹

One of the strategies the Russian occupying authorities used to seize Ukrainian property was to place companies under the external management of Russian-aligned companies. The principle of external management, derived from Russian bankruptcy law, allows authorities to put companies under the temporary administration of a third party or entity.³⁰ In 2022, the LPR authorities placed 17,849 Ukrainian nationalized properties under external management; this includes at least 273 agricultural enterprises. The Russian authorities transferred some companies to already identified Russian-aligned actors, such as the LPR “Ministry of Agriculture and Food,”³¹ the State Unitary Enterprises “Agrarian Fund” (AGRO FUND)³² the “Regional Agrarian Holding of the Luhansk People’s Republic,”³³ and the Municipal Unitary Enterprise “Starobilsk Elevator” (STAROBILSK ELEVATOR).³⁴ The authorities included the remaining Ukrainian companies in a list pending transfer to external management. Furthermore, the LPR Council of Ministers issued a decree imposing external management on nationalized properties.

Russian authorities have been using the principle of external management since 2014, following Russia's initial aggression against Ukraine. Between 2014 and 2017, the Russian-aligned LPR authorities placed coal and railway companies under external management.³⁵ Additionally, the LPR authorities created a so-called "temporary entity" to lead the transition from nationalized property to its "new" ownership. The entity was dissolved on July 25, 2023.³⁶

On May 21, 2022, KOZLOV, as LPR Chairman of the Government, issued a resolution placing "STAROBILSK ELEVATOR" LLC, "Nibulon" LLC, and "Agroton Public Limited" under the external management of the newly established municipal unitary enterprise, which they renamed using the same name of STAROBILSK ELEVATOR. All of these companies are located in newly occupied parts of Luhansk Oblast.³⁷ On July 1, 2022, KOZLOV gave "Luhansk Agricultural Company" LLC external management over Nibulon and Agroton through a lease. Alexey Melnikov ("MELNIKOV") directed "Luhansk Agricultural Company" LLC, which was constituted two days before the transfer. MELNIKOV is a former high-ranking official in Russia's Krasnodar province. These two critical resolutions were not made public on the official website of the LPR.³⁸ No other similar resolutions concerning the other agricultural properties could be retrieved. The limited scope of the property seizure in Luhansk suggests that the appropriation of the STAROBILSK ELEVATOR was orchestrated and intentional.

The Russian Seizure of STAROBILSK ELEVATOR

The Ukrainian Prosecutor General's Office (PGO) pre-trial investigation suggests that the transfer of property of the STAROBILSK ELEVATOR was a coordinated operation involving multiple levels of Russian and LPR authority. The PGO issued notices of suspicion against MELNIKOV;³⁹ Yuriy Pronko ("PRONKO"), LPR Minister of Agriculture;⁴⁰ and Serhiy Shilov ("SHILOV"), former Executive Director of Agroton and later Executive Director of "Luhansk Agro-Industrial Company," who collaborated with MELNIKOV.⁴¹

On May 19, 2022, two days before issuing the resolution transferring STAROBILSK ELEVATOR to external management, KOZLOV met with PRONKO, MELNIKOV, and Yevheniy Khvorostina ("KHVOROSTINA"), CEO of JSC Firm "Agrocomplex Tkachev" ("AGROCOMPLEX"), to agree on a joint project for the integrated development of the LPR agro-industrial complex. On May 25, 2022, KOZLOV sent a letter to Marat Khusnullin ("KHUSNULLIN"), Deputy Prime Minister of the Russian Federation, informing him about the joint project that would exceed 125,000 hectares and requesting permission for AGROCOMPLEX's operation in Luhansk.⁴² KHUSNULLIN also led a national commission that participated in the transfer of allegedly non-functioning and abandoned enterprises in the four newly occupied regions.⁴³ The national commission, based in Moscow, decided on the transfer of major enterprises, including mining and energy facilities.⁴⁴ However, KOZLOV's letter suggests that the national commission may have overseen the transfer of some major agricultural facilities.

In late 2022, AGROCOMPLEX took over 161,874 hectares of Ukrainian farmland, including 101,171 hectares held by Agroton and 20,234 hectares held by Nibulon in Luhansk.⁴⁵ MELNIKOV oversaw the preparation and grain harvesting of 51,000 hectares of land. These facts demonstrate that KOZLOV, PRONKO, MELNIKOV, and AGROCOMPLEX operated in coordination to appropriate Ukrainian property and grain, including seizing STAROBILSK ELEVATOR, given its importance to Luhansk's grain production.

The Russians established a company network to control grain exports in Luhansk

The STAROBILSK ELEVATOR is the largest elevator complex in Luhansk Oblast, with a capacity of 157,700 tons.⁴⁶ On March 2, 2022, the Russians occupied its facilities and have been using it as the principal transshipment hub for grain export to Russia since June 2022.⁴⁷ Its connected railroad infrastructure provides immediate access to Luhansk's City transport system. From there, the Russians can ship agricultural goods to the grain reprocessing facilities in the Russian city of Millerovo, Rostov Oblast, near the border, and to the nearby Russian ports of Taganrog and Rostov-on-Don. On June 10, 2022, the STAROBILSK ELEVATOR exported the first batch of 650 tons of grain to Rostov-on-Don in Russia, which the occupying authorities publicized as a success.⁴⁸

The Agrarian Fund ("AGRO FUND") is another leading unitary enterprise in LPR's grain trade chain. AGRO FUND was established in 2015, before the full-scale invasion, and is part of the LPR's integrated agro-industrial development plan conceived in May 2022. Ivan Ivanovich Mareechev ("MAREECHEV"), a collaborator from Luhansk Oblast, directs AGRO FUND.⁴⁹ In 2016 and 2017, LPR's Council of Ministers transferred different agricultural products belonging to dozens of farming companies to the AGRO FUND, including 10,000 tons of grain in 2017 and 7,700 tons of grain in 2019.⁵⁰ These modest volumes supplied the domestic market in Ukraine.

In 2019, AGRO FUND started running two new State-financed storage facilities, Lutuginsky and Zimogoryevsky.⁵¹ AGRO FUND also gained external management over the Solidarnensky Elevator, located southwest of Starobilsk, with a capacity of 15,000 tons of grain, and over a warehouse in Rovenki (located south of Luhansk on the way to the Russian city of Rostov-on-Don).

Gelios Plus LLC (GELIOS PLUS) is another company involved in the Russian export scheme for Ukrainian grain. GELIOS PLUS first exported grain stocks dating back to 2019 from Zimogoryevsky and then from Rovenki in the months before the full-scale invasion. Subsequently, GELIOS PLUS' exports greatly surpassed its trade volumes from the 2016–2019 period, reaching 63,000 tons of wheat in total from September 2021 to July 2022.⁵²

In July 2022, AGRO FUND's exports abruptly ceased, and STAROBILSK ELEVATOR, under Russian control, began shipping wheat to GELIOS PLUS, reaching at least 50,000 tons in August 2022 alone.⁵³ However, AGRO FUND continues purchasing grain from farmers,⁵⁴ suggesting it might export some of it under the name of STAROBILSK ELEVATOR. Additionally, STAROBILSK ELEVATOR may be using AGRO FUND's warehouses, as it reportedly sends 1,000 tons⁵⁵ of the 2,500-3,000 tons⁵⁶ received daily to storage facilities belonging to other companies. In late November 2022, the National Resistance Center of Ukraine reported that STAROBILSK ELEVATOR transferred nearly 900 tons of stolen grain to the AGRO FUND.⁵⁷

Overall, this indicates that the Russians set a structure conformed by STAROBILSK ELEVATOR, AGRO FUND, and GELIOS PLUS to control the export of Ukrainian grain from Luhansk to Russia. Evidence indicates that MELNIKOV organized the companies' grain transport and interconnected operations after July 1, 2022.⁵⁸

4. LEGAL ANALYSIS

Luhansk is occupied under International Law

When analyzing the responsibilities of an Occupying Power under international law, the first step is to establish whether an occupation situation exists. This determination triggers the application of specific provisions of International Humanitarian Law (IHL), known as the law of occupation. A territory is occupied when it is “actually placed under the authority of the hostile army.”⁵⁹ The law of occupation imposes certain obligations on the Occupying Power, particularly on the treatment of the civilian population.⁶⁰ The situations in Luhansk, Zaporizhzhia, Donetsk, and Kherson Oblasts factually amount to occupation. Therefore, Russia is bound by the responsibilities of an Occupying power under IHL.

4.1. The responsibility of the Occupying Power for breaching property rights

Luhansk is occupied under International Law

Russia’s control over the Luhansk Oblast began in May 2014 with its support for separatists declaring independence from Ukraine. This took place just after the annexation of Crimea in March 2014. At the start of the large-scale invasion in February 2022, Russia recognized the independence of the LPR for the first time. Following that, Russia annexed the LPR on September 30, 2022. Given that the territory of the Luhansk Region is “actually placed under the authority of the hostile army,”⁶¹ the relevant law of occupation is triggered, as is the application of IHL rules.

Since Russia assumed control over the Luhansk Oblast in 2014, it has made legislative efforts to alter the legal framework on property relations. The table below demonstrates multiple rounds of legislative and executive changes concerning properties and property management in LPR.

First, on November 4, 2014, the Luhansk People’s Council, LPR’s law-making body, passed a law nationalizing all State-owned and ownerless property on the LPR’s territory. Then, KOZLOV, the Council’s Chairman, issued decrees declaring individual properties ownerless, which resulted in LPR’s State ownership over these properties.

Timeline of property appropriation, nationalization, and transfer of Ukrainian property in Luhansk	
November 4, 2014	First round of property nationalizations starts - LPR starts nationalizing ownerless state property following Law № 36-І.
2016 – 2017	The LPR Council of Ministers issues resolutions settling the transfer of agricultural products from farming companies to the Agrarian Fund.
April 25, 2017	LPR issues Procedure Decree № 216/17 on establishing temporary external property management.
2018 – 2019	LPR Council Chairman Sergey Kozlov (KOZLOV) issues orders declaring numerous individual properties ownerless, confiscating them, and then transferring them into LPR State ownership.

May 21, 2022	Resolution № 462/22 imposes external management over the property complexes of STAROBILSK ELEVATOR LLC.
August 4, 2022	LPR Luhansk Peoples' Council issues Law № 402-III, enabling the transfer of abandoned private real estate to State ownership
August 20, 2022	Implementing decree № 632/22 issued on converting immovable property into State property.
September 28, 2022	Second round of property nationalizations starts - Law № 414-III nationalizes "enemy property" in the LPR; A list of 17,849 nationalized properties in the LPR is issued.
July 4, 2023	Decree YF-189/23 implements Federal Resolution № 2474 on State management of ownerless property implementing ⁶²
February 8, 2024	Law № 43-I regulates property rights in relation to ownerless movable property located on real estate objects.
March 27, 2024	LPR issues Law № 52-I on the identification, use, and recognition of the right of municipal ownership of municipalities of the LPR to residential premises with signs of ownerless property.

Second, the August 4, 2022 law transfers abandoned private real estate to State property. The law declares that the LPR Government will determine which properties are abandoned, and therefore will be transferred. However, the law does not provide any grounds for the LPR Government's decisions regarding the determination of abandonment and the subsequent transfer. On August 20, 2022, KOZLOV issued an accompanying decree detailing the procedure for converting real estate to State ownership and stipulating compensation payments for owners.⁶³ Under this procedure, properties can be transferred to State ownership if owners have not paid for housing and communal services for five or more years, with compensation provided through cash payments. Individuals who participated in hostilities on the side of Ukraine's armed forces or those subject to LPR and/or Russian court procedures on alleged war crimes were not entitled to compensation.⁶⁴

Third, on September 28, 2022, LPR passed a law nationalizing property owned by foreign States that commit "unfriendly" acts on the LPR, as well as foreign persons associated with such States and persons controlled by such foreign persons, *"regardless of their place of registration or place of predominant economic activity."*⁶⁵ This law potentially applies to the private property of Ukrainian citizens and thus overlaps with the previous law.

These laws are in contravention of IHL. IHL stipulates that the Occupying Power must allow the territory to be administered as it was before the occupation insofar as possible. This means they must respect the laws existing before the occupation unless absolutely prevented from doing so.⁶⁶ While IHL recognizes that, in certain situations, the Occupying Power may adopt new legislation in the occupied territory, it must be temporary and expire once the occupation ends.⁶⁷ However, the Russian annexation of multiple regions and the efforts to definitely alter property management, administration, and ownership rules suggest that Russian legislation aims to be permanent, which violates the law of occupation.

An Occupying power is only relieved of its duty to maintain the existing legal order of an occupied territory in limited circumstances under IHL, namely when the existing

laws: (1) threaten the security of the occupied territory, (2) obstruct law and order, or (3) hinder the application of IHL.⁶⁸ None of these conditions exist in Luhansk. Thus, the Russian Federation violates IHL by failing to uphold its obligation to maintain the existing legislation of the occupied territory as the occupying power in Luhansk.

First, there is no indication that the Russian occupying forces faced threats to security or obstacles to public order that would warrant legislative changes in property administration. Therefore, the Occupying Power had no authorization under IHL to suspend or repeal Ukrainian property law.

Second, Ukraine's existing property law regime was not in breach or restricted the application of any IHL provision in any way. Thus, the Russians had no legal basis to change the property law regime to fulfill their IHL obligations as the Occupying Power.

Finally, even if exceptions to the obligation to respect the law of occupied territories existed in Ukraine (which they do not), the legislation the occupying power enacts must comply with IHL. This was not the case in Zaporizhzhia, as Russian legislation violates IHL. On the one hand, the legislation facilitates the commission of the war crime of pillage. On the other hand, it forces Ukrainian citizens to pledge allegiance to Russia by forcing them to acquire Russian citizenship because proof of Russian identification is required in the process of protecting their property. IHL prohibits the occupying power from compelling the population of occupied territories to swear allegiance to them.⁶⁹

In 2019, many media sources began publishing information about the forced passportization of Ukrainian citizens in the LPR. This followed President Putin's decree on the simplified granting of Russian citizenship to Ukrainian citizens born and residing in the Crimea, Luhansk, and Donetsk Regions.⁷⁰ An LPR resident reported on social media that Russians (most likely representatives of the Occupying Authorities or the Russian military) came to his acquaintances, owners of medical businesses, and gave them an ultimatum – get a Russian passport within a month, otherwise *“he and his business will be ruined.”*⁷¹ After that, the administration began checking businesses looking for employees without Russian passports. Owners were asked to provide the relevant lists of their employees: men – to local military enlistment offices and women – to the occupation “administration.”⁷²

Following the adoption of several acts on passportization, LPR authorities required business owners to present proof of Russian identification or risk losing their property. By doing this, the occupying authorities breached the IHL rule not to compel the population on the occupied territory to swear allegiance to the Occupying Power.⁷³ The Occupying Power cannot lawfully circumvent this rule by enacting such legislation.⁷⁴ The failure by the Russian Federation to fulfill its obligation as occupying authority in Luhansk to maintain the existing legislation of the occupied territory has been and continues to be in violation of IHL.

4.2. The appropriation of public property under UHL

IHL authorizes occupying authorities to seize public property on the occupied territories and use it in accordance with their needs. When it comes to immovable property, IHL recognizes that the occupying State gains the position of an administrator and beneficiary of public buildings, real estate, forests, and agricultural estates formerly belonging to the State under occupation.⁷⁵ The list of immovable property is not exhaustive, and an Occupying Power can also seize, for instance, airfields or naval dockyards in occupied territories.⁷⁶

On November 4, 2014, the Luhansk People's Council passed a law nationalizing all Ukrainian State-owned property located on its territory.⁷⁷ Based on this law, KOZLOV issued orders in 2018 and 2019 declaring numerous individual properties as ownerless. The properties were then confiscated and transferred to LPR State ownership. KOZLOV's orders, published on the official LPR Government website,⁷⁸ concern former Ukrainian State properties in addition to private companies.

On September 28, 2022, the Luhansk People's Council passed another law nationalizing property owned by foreign States that commit "unfriendly"⁷⁹ acts on the LPR in addition to property owned or controlled by the State of Ukraine.⁸⁰

This means the occupational administration has not acted solely as an administrator and beneficiary of these properties in compliance with IHL. Instead, they transferred property management to other Russian-aligned entities in Luhansk. The 2022 list of 17,849 nationalized properties specifies that the property was transferred to external management. For some enterprises, the table indicates that "it [is] planned to transfer [them] to temporary external management"; for others, it is already indicated in the list to whom they were transferred. Entities exercising external management include the LPR "Ministry of Agriculture and Food,"⁸¹ the State Unitary Enterprises AGRO FUND,⁸² the "Regional Agrarian Holding of the Luhansk People's Republic,"⁸³ and the Municipal Unitary Enterprise "STAROBILSK ELEVATOR."⁸⁴

4.3. The appropriation of private property as a violation of IHL and international criminal law

The Russians appropriated Ukrainian Property in Luhansk in Two Waves

Two rounds of property appropriation can be identified in Luhansk. The first round of property nationalization concerning private property in the LPR started on November 4, 2014, with the Luhansk People's Council's law nationalizing all "ownerless" property located on its territory.⁸⁵ Based on this law, KOZLOV issued orders in 2018 and 2019 that declared numerous individual properties as ownerless. Afterwards, the properties were confiscated and transferred into LPR State ownership. KOZLOV's orders⁸⁶ concern both formerly Ukrainian State properties as well as private companies. The second wave took place from September 2022 onwards, following the Russian full-scale invasion, occupation, and annexation of Luhansk. In the second wave, Russian authorities followed a similar approach as in other oblasts and directly appropriated Ukrainian private property.

The Russian Appropriation Protocol violates IHL and International Criminal Law

The Russian appropriation of Ukrainian property in Luhansk violates IHL and International Criminal Law.

In the first instance, IHL regulates the protection and appropriate use of private and public property during hostilities and under occupation. To ensure this, it forbids:

- i. the seizure of the enemy's property during hostilities, unless justified by military necessity;⁸⁷
- ii. the confiscation of private property under occupation;⁸⁸ and
- iii. pillage during hostilities and under occupation.⁸⁹

This restricts the circumstances in which the appropriation of enemy property is permitted under IHL.

Furthermore, International Criminal Law case law widely recognizes the illegal appropriation of property as a war crime.⁹⁰ We apply the Rome Statute (RS) of the International Criminal Court (ICC) as an analytical framework, considering that the ICC has jurisdiction over the Situation in Ukraine,⁹¹ and has been investigating it since March 2, 2022.⁹² In addition, Ukraine became a State Party to the Rome Statute on January 1, 2025.⁹³

Article 8 of the RS criminalizes the pillage and seizure of the enemy's property as war crimes, regardless of the property's private or public nature. This applies to and is associated with both non-international and international armed conflicts, including military occupation.

<p>The <i>Elements of Crimes</i> provide that the following establish the war crime of pillage:</p> <ol style="list-style-type: none"> 1. The perpetrator appropriated certain property. 2. The perpetrator intended to deprive the owner of the property and to appropriate it for private or personal use. 3. The appropriation was without the owner's consent. 4. The conduct took place in the context of and was associated with an international armed conflict. 5. The perpetrator was aware of the factual circumstances that established the existence of an armed conflict.⁹⁴ 	<p>The <i>Elements of Crimes</i> provide that the following establish the war crime of destroying or seizing the enemy's property:</p> <ol style="list-style-type: none"> 1. The perpetrator destroyed or seized certain property. 2. Such property was the property of an adversary.⁹⁵ 3. Such property was protected from destruction or seizure under the international law of armed conflict. 4. The perpetrator was aware of the factual circumstances that established the status of the property. 5. The destruction or seizure was not required by military necessity. 6. The conduct took place in the context of and was associated with an international armed conflict. 7. The perpetrator was aware of factual circumstances that established the existence of an armed conflict.⁹⁶
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The last two elements for both crimes are identical and are satisfied here.

The instances of appropriation of property in the Luhansk Oblast described in this report were carried out by Russian occupying forces from 2014 onwards and following the full-scale invasion of Ukraine in February 2022. They occurred, therefore, in the context of an international armed conflict between Ukraine and Russia.⁹⁷ It is undisputed that potential perpetrators were aware of the factual circumstances establishing the existence of an armed conflict, given its widespread public recognition.

Similarly, the perpetrators' actions were linked to the armed conflict, as they implemented the expropriation policy in occupied Luhansk shortly after assuming key governmental positions in the Luhansk People's Council or the LPR Government. This allowed them to control the market, agricultural production, and Ukrainian businesses. The implementation of the policy and subsequent conduct furthering it took place in connection with Russia's occupation and annexation of the Luhansk Region, which was

only made possible through the military invasion of the territory.

War Crime of Pillage

In addition to the two elements presented above, the **crime of pillage** requires the appropriation of property, the perpetrator's intention to deprive the owner of it, and its appropriation for private or personal use without the owner's consent.

The Luhansk Oblast's first nationalization round of 2014, accompanied by orders in 2018 and 2019, resulted in confiscation of private "ownerless" properties and their transfer into the LPR "State" ownership. The pattern of conduct intended to deprive the Ukrainian owners of their property and to appropriate it for private or personal use. The fact that a public entity, ostensibly representing the Occupying Power, appropriated property does not, in itself, negate a finding of pillage as public entities can be used to appropriate property for personal use. Thus, the LPR committed pillage. First, the LPR cannot be regarded as a public entity, regardless of its name, given its illegal status connected with the occupation and annexation of the Luhansk territory.⁹⁸ Second, the property transfer into the LPR ownership did, in fact, result in the properties' appropriation for private or personal use, considering the lack of military necessity justifications.⁹⁹

Similarly, transferring properties to external management, including the LPR "Ministry of Agriculture and Food,"¹⁰⁰ the State Unitary Enterprises AGRO FUND,¹⁰¹ the "Regional Agrarian Holding of the Luhansk People's Republic,"¹⁰² and the Municipal Unitary Enterprise STAROBILSK ELEVATOR¹⁰³ does not prevent the conduct from being qualified as pillage. This is supported by the drafting history of the war crime of pillage under Article 8 RS, which shows that the terms "private" and "personal" were meant to also encompass cases of property given to third persons. Case law similarly confirms that pillage "includes situations where the perpetrator did not intend to use the pillaged items himself or herself."¹⁰⁴ The transfer of the properties to third entities within the LPR for external management thus does not prevent the legal qualification of pillage.

The final element of the war crime of pillage is that the appropriation occurred without the owner's consent. Historically, violent expropriation was necessary to prove the owner's inherent lack of consent.¹⁰⁵ However, recent case law broadened the definition, allowing the inference of lack of consent when the owner is absent or under coercion.¹⁰⁶ Such was the case in the Luhansk Oblast. Alleged perpetrators targeted "ownerless" properties, which potential perpetrators identified in orders from 2018 and 2019. In these instances, the absence of identified owners indicates the lack of consent.

A witness from the Svatove City of the Luhansk Oblast occupied during the full-scale invasion in February 2022, stated that "occupiers first sealed the premises and then re-registered them to the Agrarian Fund (AGRO FUND) enterprise." When the company objected to this practice, the Russian military imprisoned a company's accountant and took them into custody in Starobilsk and Luhansk with the aim of obtaining information about the enterprise and elevator. As a result, the Russians forced the imprisoned accountant to give them all the company's documents.¹⁰⁷

The second round of nationalization occurred following the full-scale invasion of 2022 and was accompanied by decree № 632/22 detailing the procedure for converting private real estate to State ownership and stipulating compensation payments for owners. It is unclear whether real estate owners or owners who fled Ukraine could file for compensation and how.¹⁰⁸ The LPR also looted apartments under the pretext of repairing them and then nationalized them.¹⁰⁹ The LPR did this without the owners' consent, qualifying them as pillage.

War Crime of Seizing Enemy Property

The **crime of seizing enemy property** requires that the property seized belonged to an adversary and was protected from seizure under IHL.

The Russian occupying authorities specifically seized Ukrainian private property in Luhansk. The seized property was civilian-owned private property –including immovable property, such as land plots, residential premises, and administrative buildings, as well as commercial enterprises, including agricultural entities and personal belongings– which are protected under IHL.¹¹⁰

The crime of seizing enemy property requires that the perpetrator is aware of the factual circumstances that established the status of the property and that its seizure is not required by military necessity. It is undisputed that the Russian occupying authorities in Luhansk knew that they were seizing civilian-owned private property. The occupying authorities kept detailed property records, including ownership information, and their re-registration policy specifically included private property.¹¹¹

Additionally, military necessity cannot justify the seizure as it sought to expand the occupying authorities' control and economic advantage in the region. There is no indication that these seizures were carried out to serve a military necessity.

The Russian occupying authorities' appropriation and seizure of private property in Luhansk violate IHL rules protecting property and constitute war crimes of pillage and seizure of enemy property under international criminal law. Most property transfers in Luhansk meet the elements of the war crime of pillage. In cases where the property was taken from owners but not transferred to third parties, the elements of the war crime of seizing enemy property are satisfied.

The appropriation of grain as a war crime under International Criminal Law

STAROBILSK ELEVATOR and AGRO FUND predominantly appropriated grain in the LPR. STAROBILSK ELEVATOR was the principal transshipment hub for grain export to Russia from June 2022 onward,¹¹² and AGRO FUND was a key stakeholder in the grain trading chain in the LPR established in 2015. The chain was part of the integrated development of the agro-industrial complex in LPR, which was conceived in May 2022 and in which STAROBILSK ELEVATOR plays a leading role. In 2016¹¹³ and 2017,¹¹⁴ the LPR "Council of Ministers" issued resolutions transferring different agricultural products from dozens of farming companies to AGRO FUND. The 2017 resolution covers nearly 10,000 tons of grain, and a 2019 article refers to 14 contracts covering the purchase of 7,700 tons.¹¹⁵ These modest volumes served LPR's domestic market. This pattern of Russian appropriation of grain in Luhansk constitutes a war crime under International Criminal Law, and it is not justified under the legal exception of requisition.

An Occupying Power can legitimately acquire private and public property during wartime through requisition. This means that, under its commander's authority, the Occupying Power may demand temporary or permanent use of the property "for the needs of the army of occupation" in exchange for compensation.¹¹⁶ This was not observed in Luhansk.

First, the Russian occupying authorities never demanded the appropriation of grain for the army's needs. Instead, they exploited grain in the occupied territories and transported it out of Ukraine for commercial purposes.

Second, the commander must demand the requisitions in the occupied territory.¹¹⁷

There is no public record of an Occupying Power commander making such a demand in Luhansk

Third, the Occupying Power must ensure that fair value is paid for any requisitioned goods.¹¹⁸ The 2016 and 2017 resolutions of the LPR “Council of Ministers” implemented a free-of-charge transfer of agricultural products to AGRO FUND. Hence, the owners did not receive payment for the expropriation. Moreover, the authorities non-consensually expropriated the products of owners who fled the oblast due to the occupation, leaving grain and other products in their enterprises’ warehouses. A witness reported nothing left in his warehouse when he returned. Namely, the Russians took 12,000 tons of wheat, 7,000 tons of sunflower seeds, 250,000 tons of fertilizers, and about 1,000 tons of colza while he was away from the region and without compensation.¹¹⁹

In other instances, procurement records indicate that AGRO FUND continued purchasing grain from farmers,¹²⁰ and concluded contracts with the agrarians. Even if this appears consensual, the farmers had no alternative but to sell their grain to entities controlled by the Occupying Authorities, which meant they were virtually forced to accept the contracts and payment conditions offered by the Russians. This implies they were selling under coercion. By comparison, in Zaporizhzhia, farmers were forced to accept grain prices that are up to two times lower than the price that the State Grain Operator advertises it will pay¹²¹ or are left with a fraction of the sum agreed.¹²² Additionally, farmers in Zaporizhzhia were threatened with confiscation of their grain if they refused to accept a low price from the occupying authorities.¹²³ Post-World War II tribunals recognized that appropriating private property in exchange for monetary compensation does not constitute a lawful requisition if carried out against the will of the owner.¹²⁴

Therefore, in the absence of a military commander issuing the requisition order for the Russian army’s needs and proper compensation for the grain owners, the Russian Occupying Power’s appropriations of grain in Luhansk may amount to war crimes of pillage.

5. CONCLUSION

The nationalization and confiscation policies of the Russian occupying authorities in the Luhansk People’s Republic (LPR) represent systematic and deliberate efforts to seize control of both private and public property. Since the beginning of the Russian occupation of parts of Ukraine’s Luhansk Oblast in 2014, these actions have evolved from isolated property seizures to a coordinated pattern aimed at seizing property, including industry, agriculture, and infrastructure. Evidence suggests close cooperation between the occupying authorities, Russia-controlled entities, and affiliated individuals in implementing these measures. This highlights a centralized plan or policy to exploit the region’s assets.

Since 2014, the authorities in Russia-occupied Luhansk Oblast have issued numerous legislative acts aimed at seizing control of property under the guise of nationalization. These acts disregard the obligations of an Occupying Power to preserve the legal framework of the occupied territory and ensure the protection of private and public property for the benefit of the local population. Instead, these measures serve political and economic interests aligned with the Occupying Power, amounting to economic exploitation.

The ICC has had jurisdiction over the Situation in Ukraine since the two self-referrals of Ukraine in 2014 and 2015. Ukraine itself became an ICC State Party as of January 1,

2025. The Office of the Prosecutor has been investigating the Situation in Ukraine since March 2, 2022, following the referral of 39 States Parties to the Rome Statute. The initial chapeau element of Article 8 of the Rome Statute establishes a jurisdictional threshold for prosecuting war crimes, particularly when committed as part of a plan or policy. The systematic appropriation of properties in the Luhansk Oblast constitutes pillage, which entails a violation of international humanitarian law and a potential war crime under the Rome Statute. This satisfies the elements for the existence of a plan or policy to commit such acts. These practices involve Russian companies, military-civilian authorities, and higher-level officials, highlighting the organized nature of the actions and their alignment with broader political and economic objectives. Identifying the full network of individuals and entities responsible and bringing them to justice is essential for national or international legal proceedings and the imposition of targeted sanctions.

APPENDIX I - COMPREHENSIVE TIMELINE

April 7, 2014	A group of pro-Russian citizens (most often called “separatists”) seizes the Security Service of Ukraine (SBU) ¹²⁵ building in the city of Donetsk and proclaims the creation of the so-called Donetsk People’s Republic (DPR). ¹²⁶
April 27, 2014	Pro-Russian separatists seize the SBU building in the city of Luhansk and proclaim the creation of the so-called Luhansk People’s Republic (LPR). ¹²⁷
May 11-12, 2014	So-called “referendums on self-determination” are held on the claimed territories of the DPR and LPR, resulting in both separatist “republics” proclaiming their “independence” from Ukraine. ¹²⁸
November 4, 2014	Law № 36-I, nationalizing ownerless State property, launches the first round of property nationalizations.
2016–2017	LPR “Council of Ministers” issues resolutions settling the transfer of agricultural products from farming companies to the Agrarian Fund.
April 25, 2017	Procedure decree № 216/17 on the establishment of temporary external property management is issued.
2018–2019	LPR “Council Chairman” Sergey Kozlov issues orders that declare numerous individual properties as ownerless, confiscating the property to then transfer them into LPR “State” ownership.
February 21, 2022	Russia signs documents on the recognition of the Donetsk and Luhansk People’s Republics. ¹²⁹
February 24, 2022	Russia launches its full-scale invasion of Ukraine.
May 21, 2022	Resolution № 462/22 imposes external management over the property complexes of STAROBILSK ELEVATOR LLC.
August 4, 2022	Law № 402-III, enabling the transfer of abandoned private real estate to State ownership, initiates the second round of property nationalizations.

August 20, 2022	Implementing decree № 632/22 on the conversion of immovable property into State property is issued.
September 23–27, 2022	A sham referendum is held in the Russian-occupied part of Luhansk Oblast, after which Russia declares the annexation of Luhansk Oblast (and the simultaneous annexation of the Donetsk, Zaporizhzhia, and Kherson Oblasts). ¹³⁰
September 28, 2022	Law № 414-III nationalizes “enemy property” in the LPR; a list is issued of 17,849 nationalized properties in the LPR.
September 30, 2022	Putin signs “accession treaties” stating that the DPR, LPR, Zaporizhzhia, and Kherson Oblasts of Ukraine are to be integrated into the Russian Federation.
October 2, 2022	The Russian Constitutional Court approves the above annexation treaties. ¹³¹
October 4, 2022	Putin signs federal laws ratifying the “treaties on the acceptance into the Russian Federation” of the occupied territories of Ukraine, including the LPR. ¹³²
July 4, 2023	Decree YF-189/23 is issued on State management of ownerless property, implementing Federal Resolution № 2474. ¹³³
February 8, 2024	Law № 43-I regulates property rights in relation to ownerless movable property located on real estate objects.
March 27, 2024	Law № 52-I is issued on the identification, use, and recognition of the right of municipal ownership of municipalities of the LPR to residential premises with signs of ownerless property.

ENDNOTES

1. See for instance “Agricultural War Damages Review Ukraine - Rapid Damage Assessment,” *Center for Food and Land Use Research at Kyiv School of Economics*, Jun. 8, 2022, https://kse.ua/wp-content/uploads/2022/06/Damages_report_issue1-1.pdf, last accessed May 9, 2024; and confirmed by PEJ Witness Personal Accounts (P010 Jan. 25, 2023; P012 Sep. 30, 2022; P013 No date; P115 Jan. 16, 2024; P128 Jan. 19, 2024; P129 Jan. 16, 2024; and P131 Mar. 3, 2024).
2. An oblast in Ukraine, sometimes translated as region or province, is the main type of first-level administrative division of the country.
3. Part of the Kharkiv Oblast was temporarily occupied in February 2022, but almost all of it was liberated in November of the same year.
4. Notably, Chechen “kadyrovtsy” groups – see, for instance, “Traitor Dmytro Tabachnyk steals Ukrainian grain, agricultural machinery and develops business in Crimea,” *Television Toronto*, Dec. 19, 2023, <https://torontotv.substack.com/p/4ba>, last accessed, May 9, 2024; and similarly from PEJ Witness Personal Accounts (P-073 Sep. 30, 2023; P-077 Sep. 25, 2023; and P-079, Sep. 25, 2023).
5. Such as the Novooleksiivskyi Elevator (see *infra*, part 4), as per PEJ Witness Personal Accounts (P003 Sep. 8, 2022; P012, Sep. 30 2022; and P131 Mar. 3, 2024).
6. Following PEJ’s briefs on Kherson (June 2024) and Zaporizhzhia (January 2025), and preceding the upcoming briefs on Mykolaiv, Donetsk, and Kharkiv.
7. Richard Rozwadowski, John O’Connell, Farrukh Toirov and Yana Voitovska, “The agriculture sector in eastern Ukraine: analysis and recommendations,” *Food and Agricultural Organisation (FAO)*, 2018. Before the conflict, in 2010, the total value of agricultural production of the Donetsk Oblast placed it in the list of top six oblasts of the country.
8. **F1382.** Tingting He, Maoxin Zhang, Wu Xiao, Ge Zai, Yan Wang, Andong Guo, Cifang Wu, “Quantitative analysis of abandonment and grain production loss under armed conflict in Ukraine,” *Journal Of Cleaner Production*, May, 2023. See *infra*, part 3.
9. *Ibid.* The first one is the junction between Kherson and Zaporizhzhia Oblasts.
10. At the start of 2014, Luhansk Oblast had 2,234,900 residents, See <https://www.encyclopediaofukraine.com/display.asp?linkpath=pages%5CL%5CU%5CLuhanskoblast.htm>, last accessed Sep. 30, 2024.
11. “Human Rights Situation During The Russian Occupation Of Territory Of Ukraine And Its Aftermath, 24 February 2022 - 31 December 2023,” United Nations Office of The High Commissioner for Human Rights, last available map, last accessed Mar. 20, 2024.
12. The Luhansk People’s Republic is a self-proclaimed separatist entity backed by Russia following Crimea’s annexation in 2014. Although Russian backed, Russia did not annex it until 2022.
13. In May 2014, Russia effectively took control of Southern Luhansk and Eastern Donetsk Oblasts by supporting separatists who declared independence from Ukraine. This move followed the annexation of the Crimean peninsula in March of the same year. Although Russia only officially recognized the independence of these regions at the start of the full-scale invasion in February 2022, they were annexed on September 30, 2022, along with the occupied Kherson and Zaporizhzhia Oblasts, continuing as so-called “republics”: the Donetsk People’s Republic and the Luhansk People’s Republic. The federal constitutional laws on the accession of the four oblasts, signed by Russian President Vladimir Putin on October 4, 2022, allow a transition period until January 2026 for Russian legal, judicial, and political systems to be fully implemented in these territories. See “Президент РФ подписал законы о вхождении в состав России ДНР, ЛНР, Запорожской и Херсонской областей” [“The Russian President signed laws on the accession to Russia of the DPR, LPR, Zaporizhzhia and Kherson regions”], *Государственная Дума*, Oct. 5, 2022, <http://duma.gov.ru/news/55420/>, last accessed Jan. 6, 2025.
14. **F1679.** Law of the Luhansk People’s Republic №36-І “Об управлении и распоряжении собственностью Луганской Народной Республики” [“On the management and disposal of property of the Luhansk People’s Republic”], Nov. 4, 2014, <https://nslnr.su/zakonodatelstvo/normativno-pravovaya-baza/635/>, Art. 1, Part 2, para. 2, last accessed Sep. 30, 2024. The definition of nationalized property closely resembles the one in a similar resolution issued in Crimea on April 30, 2024, valid during its rather short interim period until January 1, 2015, defined in its Federal Constitutional Law №6-FKZ “On the Admission of the Republic of Crimea to the Russian Federation and the Formation of New Subjects within the Russian Federation - the Republic of Crimea and the Federal City of Sevastopol,” Mar. 21, 2014, <https://www.prilib.ru/en/node/353509>, last accessed Sep. 30, 2024.

15. See <https://sovminlr.ru/akty-soveta-ministrov/rasporyazheniya/page/14/>, last accessed Sep. 30, 2024.
16. Please note that the scheme does not include all the predecessors who held the relevant positions due to frequent changes at the beginning of the occupation. Some of the unmentioned officials held their positions for two months without making any significant decisions in the context of the topic of this report.
17. **F1691.** Decree of the Luhansk People's Republic №632/22 "Об утверждении Порядка обращения недвижимого имущества в государственную собственность Луганской Народной Республики, а также выплаты собственникам компенсации стоимости обращенного в государственную собственность недвижимого имущества," ["On Approval of the Procedure for conversion of immovable property into state ownership of the Luhansk People's Republic, and payment of compensation to owners for the cost of immovable property converted into state ownership"], Aug. 22, 2022 <https://sovminlr.ru/akty-soveta-ministrov/postanovleniya/29254-ob-utverzhdenii-poryadka-obrascheniya-nedvizhimogo-imuschestva-v-gosudarstvennuyu-sobstvennost-luganskoy-narodnoy-respubliki-a-takzhe-vyplaty-sobstvennikam-kompensacii-stoimosti-obraschennogo-v.html>, last accessed Sep. 30, 2024.
18. *Ibid.*
19. **F1692.** Law of the Luhansk People's Republic №414-III "Об особенностях регулирования имущественных и земельных отношений на территории Луганской Народной Республики" ["On Peculiarities of Regulation of Property and Land Relations on the Territory of the Luhansk People's Republic"], Sep. 28, 2022, <https://nslnr.su/upload/medialibrary/f18/414.pdf>, last accessed Oct. 30, 2024.
20. **F1238.** Russian Federation, Decree of the Head of the Military-Civilian Administration of the Kherson Oblast №101/1-у "Об особенностях регулирования имущественных и земельных отношений на территории Херсонской области" ["On Specifics of Regulation of Property and Land Relations on the Territory of Kherson Oblast"], Sep. 28, 2022. See pages 5-7 of PEJ's Kherson report "The Pillage of Ukrainian Agricultural Assets: The Role of Russian Appointed Authorities in the Occupied Districts of Kherson Oblast, Ukraine," Jun. 2024, <https://www.projectexpeditejustice.org/kherson>, last accessed Jan. 14, 2025.
21. **F1680.** Order of the Luhansk People's Republic "Перечень имущества, обращенного в государственную собственность Луганской Народной Республики," ["List of property transferred to state ownership of the Luhansk People's Republic"], Sep. 30, 2022.
22. *Ibid.* See, for example, items under numbers 4728 – 5034 in the list.
23. *Ibid.*
24. Russia also announced the annexation of the Donetsk People's Republic (DPR), and of the Zaporizhzhia and Kherson Oblasts of Ukraine on the same day.
25. United Nations General Assembly, "Resolution A/RES/ES-11/4," Oct. 12, 2022, <https://documents.un.org/doc/undoc/gen/n22/630/66/pdf/n2263066.pdf>, last accessed Sep. 13, 2024.
26. Decree УГ-189/23 "О некоторых вопросах управления имуществом, имеющим признаки бесхозяйного, находящимся на территории Луганской Народной Республики, и признания такого имущества бесхозяйным" ["On certain issues related to the management of property with signs of ownerlessness located in the territory of the Luhansk People's Republic and the recognition of such property as ownerless"], Jul. 14, 2023, <https://base.garant.ru/407353382/>, last accessed Nov. 27, 2024; Law №43-І "Об особенностях регулирования имущественных прав в отношении бесхозяйных движимых вещей, расположенных на объектах недвижимого имущества, находящихся на территории Луганской Народной Республики" ["On the specifics of regulation of property rights in relation to ownerless movable property located on real estate objects located on the territory of the Luhansk People's Republic"], Feb. 9, 2024, <https://nslnr.su/zakonodatelstvo/normativno-pravovaya-baza/21155/>, last accessed Nov. 27, 2024; Law №52-І "Об особенностях выявления, использования и признания права муниципальной собственности муниципальных образований Луганской Народной Республики на жилые помещения, имеющие признаки бесхозяйного имущества, расположенные на территории Луганской Народной Республики" ["On the peculiarities of identification, use and recognition of the right of of municipal property of municipal entities of the Luhansk People's Republic on residential premises, having the signs of ownerless property, located on the territory of the Luhansk People's Republic"], Mar. 24, 2024, <https://nslnr.su/zakonodatelstvo/normativno-pravovaya-baza/21550/>, last accessed Nov. 27, 2024.
27. See Zaporizhzhia Report. Such sequence, albeit with a longer period in between of one year, is also included in Article 225 concerning ownerless property of the Civil

- Code of the Russian Federation, **F1705**. https://www.wto.org/english/thewto_e/acc_e/rus_e/wtaccrus58_leg_360.pdf, last accessed Oct. 30, 2024.
28. **F1697**. Ivashkiv Olena, "Russians in Luhansk Oblast will hand over Ukrainians' housing to security forces and migrants," *Ukrainska Pravda*, Jun. 30, 2024, <https://www.pravda.com.ua/eng/news/2024/06/30/7463287/>,
 29. In the context of the full-scale invasion and seizure of Ukrainian property, Ukrainian companies were placed under the external management of Russian-aligned companies. See: Anastasia Boyko, "Российский бизнес получит в управление брошенные в новых регионах компании" ["Russian businesses will receive management of abandoned companies in new regions"], *Vedomosti*, Oct. 25, 2022, <https://www.vedomosti.ru/economics/articles/2022/10/26/947345-biznes-poluchit-broshennye-v-novih-regionah-kompanii>, last accessed Jul. 5, 2024.
 30. F1434. Anastasia Boyko, "Российский бизнес получит в управление брошенные в новых регионах компании" ["Russian businesses will receive management of abandoned companies in new regions"], *Vedomosti*, Oct. 25, 2022, <https://www.vedomosti.ru/economics/articles/2022/10/26/947345-biznes-poluchit-broshennye-v-novih-regionah-kompanii>, last accessed Jul. 5, 2024.
 31. See Extract from RusProfile on LPR Ministry of Agriculture and Food <https://www.rusprofile.ru/id/1229400032938>, last accessed Jan 16, 2025.
 32. See Extract from RusProfile on the State Unitary Enterprise "Agrarian Fund," <https://www.rusprofile.ru/id/1229400066070>, last accessed Jan 16, 2025.
 33. See Extract from RusProfile on State Unitary Enterprise "Regional Agrarian Holding of the Luhansk People's Republic," <https://www.rusprofile.ru/id/1229400023258>, last accessed Jan 16, 2025.
 34. See Extract from RusProfile on Municipal Unitary Enterprise "STAROBILSK ELEVATOR," <https://www.rusprofile.ru/id/1229400033444>, last accessed Jan 16, 2025.
 35. **F1698**. Olga Romonova "В "ЛНР" взяли под 'внешнее управление' Луганскую дирекцию 'Укрзалізниця'" ["Luhansk directorate of "Ukrzaliznytsia" was taken under 'external management' in 'LPR'"], Apr. 12, 2017, <https://www.0642.ua/news/1617469/v-lnr-vzali-pod-vnesnee-upravlenie-luganskuyu-direkciu-ukrzeliznici>, last accessed Oct. 30, 2024; **F1699**. Ivan Loginov, "Власти ЛНР ввели временную администрацию на трех украинских предприятиях" ["LPR authorities introduce temporary administration at three Ukrainian enterprises"], Mar. 5, 2017, <https://aif.ru/politics/world/vlasti-lnr-vveli-vremennuyu-administraciyu-na-treh-ukrainskih-predpriyatiyah>, last accessed Oct. 30, 2024.
 36. **F1700**. Decree of the Luhansk People's Republic №216/17 "Об утверждении Порядка установления временного внешнего управления имуществом на территории Луганской Народной Республики" ["On Approval of the Procedure for Establishing Temporary External Property Management on the Territory of the Luhansk People's Republic"], Apr. 26, 2017, <https://sovminlnr.ru/akty-soveta-ministrov/postanovleniya/8389-ob-utverzhenii-poryadka-ustanovleniya-vremennogo-vneshnego-upravleniya-imuschestvom-na-territorii-luganskoy-narodnoy-respubliki.html>, last accessed Oct. 30, 2024. Note to the reference: This is a link to the government website, the document itself has not been leaked or published.
 37. **F0502.1**. Decree of the Luhansk People's Republic №462/22 "On the transfer of property to temporary external administration," May 21, 2022.
 38. See <https://sovminlnr.ru/akty-soveta-ministrov/postanovleniya/page/48/>, last accessed Oct. 30, 2024.
 39. **F1267**. Ukrainian Prosecutor General Office, Notice of suspicion Alexey Volodymyrovych Melnikov, Nov. 3 2022.
 40. **F1681**. Ukrainian Prosecutor General Office, Notice of suspicion to Yuriy Oleksandrovych Pronko, Dec. 16, 2022, https://old.gp.gov.ua/ua/file_downloader.html?m=fslib&t=fsfile&c=download&file_id=224727, last accessed Sep. 30, 2024.
 41. **F1682**. Ukrainian Prosecutor General Office, Notice of suspicion to Serhiy Yuriyovych Shilov, Jul. 20, 2023, https://lug.gp.gov.ua/userfiles/file/povidomlennya_pro_pidozru_shilov_s.%D1%8E.%20%D0%B7%D0%B0%20%D1%87.4%20%D1%81%D1%82.111-1.%20%D1%87.1%20%D1%81%D1%82.111-2%20%D0%BA%D0%BA%D1%831.pdf, last accessed Sep. 30, 2024.
 42. **F1267**. Ukrainian Prosecutor General Office, Notice of suspicion Alexey Volodymyrovych Melnikov, Nov. 3 2022 (non-public document).
 43. Ibid.
 44. F1435. David Lewis "Economic Crime and Illicit Finance in Russia's Occupation Regime in Ukraine," SOC ACE Research Paper No 20. University of Birmingham, Sep. 2023, <https://static1.squarespace.com/static/63e4aef3ae07ad445eed03b5/t/6523ca29dd074500205bf6aa/1696844371382/SOCACE-RP20-RussiaUkraineOccupation-29Sep23.pdf>; last accessed Jul. 5, 2024.
 45. Alistair MacDonald and Oksana Pyrozok

- "Russian Oligarch Seizes 400,000 Acres of Ukrainian Farmland, Owners Say." *Wall Street Journal*, Dec. 6, 2022, <https://www.wsj.com/articles/russian-oligarch-seizes-400-000-acres-of-ukrainian-farmland-owners-say-11670338956>, last accessed Sep. 30, 2024.
46. The total capacity of Luhansk Oblast 16 elevators is 765,800 tons, See https://loga.gov.ua/sites/default/files/investiciyniy_pasport_engl.pdf.
 47. **F1701.** Luhansk information center, "Вывоз зерна из освобожденных районов в РФ будет осуществляться через новые ПП – Минсельхоз" ["Export of grain from the liberated regions to the Russian Federation will be carried out through new checkpoints — Ministry of Agriculture"], Apr. 28, 2022, <https://lug-info.com/news/vyvoz-zerna-iz-osvobozhdennyh-rajonov-v-rf-budet-osushestvlyat-sya-cherez-novye-pp-minsel-hoz>, last accessed Sep. 30, 2024.
 48. **F1702.** Starobilsk District Administration, "The first export consignment of grain from Starobilsk elevator went to Russia." VKontakte, Jun. 10, 2022, https://vk.com/wall-213550438_44, last accessed Sep. 30, 2024; Russia Tonight: "Первое зерно отгружено в Россию сразу из двух областей с освобожденных территорий. Первые поезда из Запорожья в Крым." ["The first grain was shipped to Russia from two regions at once from the liberated territories. The first trains from Zaporizhzhya to Crimea"], Jun. 13, 2022, https://dzen.ru/media/russia-tonight/pervoe-zerno-otgruzeno-v-rossiu-srazu-iz-dvuh-oblastei-s-osvobodennyh-territorii-pervye-poezda-iz-zaporozhja-v-krym-62a75e3192615c02318900f5?utm_referer=www.google.com, last accessed Sep. 30, 2024.
 49. See Extract from RusProfile on the State Unitary Enterprises "Agrarian Fund," <https://www.rusprofile.ru/id/1229400066070>, last accessed Oct. 30, 2024.
 50. "Неснижаемый запас зерна будет храниться на госэлеваторах – председатель Правительства" ["Minimum grain reserves to be stored at state elevators – Prime Minister"], Lug Info, Aug. 7, 2019, <https://lug-info.ru/news/nesnizhaemyi-zapas-zerna-budet-khranitsya-na-goselevatorakh-predsdatel-pravitelstva-foto-47542/>, last accessed Oct. 30, 2024.
 51. *Ibid.*
 52. **F1685.** Declarations of conformity filed by Gelios Plus LLC for Agrarian Fund LPR (with indicated volumes of wheat), Rosstandart, <https://xn----7sbajahheyaepnlca0aveqcb0fxl.xn--placf/search/?q=%D0%90%D0%93%D0%A0%D0%9E%D0%A4%D0%9E%D0%9D%D0%94>, last accessed Sep. 30, 2024.
 53. **F1686.** Declarations of conformity filed by Gelios Plus LLC for MUP STAROBILSK ELEVATOR (with indicated volumes of wheat), Rosstandart, <https://xn----7sbajahheyaepnlca0aveqcb0fxl.xn--placf/search/?q=%D0%90%D0%93%D0%A0%D0%9E%D0%A4%D0%9E%D0%9D%D0%94>, last accessed Sep. 30, 2024.
 54. Records available at <https://zakupki.gov.ru/epz/contractfz223/search/results.html?searchString=9402009401>
 55. https://t.me/Starobelskij_elevator/160, last accessed Sep. 30, 2024.
 56. **F1703.** Government of the LPR, "Starobilsk elevator accepts up to three thousand tonnes of grain per day," Jul. 8 2022 <https://sovminlr.ru/novosti/28680-starobelskiy-elevator-prinimaet-do-treh-tysyach-tonn-ezhesutochno.html>, last accessed Sep. 30, 2024.
 57. **F1704.** "Росіяни продовжують красти українське зерно" ["Russians continue to steal Ukrainian grain"], National Resistance Centre, Nov. 28, 2022, <https://sprotyv.mod.gov.ua/rosiyany-prodovzhuyut-krasty-ukrayinske-zerno/>, last accessed Sep. 30, 2024.
 58. **F1267.** Ukrainian Prosecutor General Office, Notice of suspicion Alexey Volodymyrovych Melnikov, Nov. 3 2022.
 59. See Convention (IV) respecting the Laws and Customs of War on Land and its annexe: Regulations concerning the Laws and Customs of War on Land. The Hague, 18 October 1907, Hague Regulations, Art. 42.
 60. See 1949 Geneva Conventions, Common Art. 2.
 61. See Convention (IV) respecting the Laws and Customs of War on Land and its annex: Regulations concerning the Laws and Customs of War on Land. The Hague, Oct. 18, 1907, Hague Regulations, Art. 42; 1949 Geneva Conventions, Common Art. 2.
 62. **F1433.** Resolution of the Government of the Russian Federation №2474 "Об утверждении Правил управления органами Донецкой Народной Республики, Луганской Народной Республики, Запорожской области и Херсонской области имеющим признаки бесхозяйного и не отнесенным к федеральной собственности, собственности субъекта Российской Федерации или муниципальной собственности имуществом, расположенным на территориях указанных субъектов Российской Федерации" ["On approval of the Rules for the management of bodies of the Donetsk People's Republic, Luhansk People's Republic, Zaporizhzhya Oblast and Kherson Oblast that have signs of ownerless and are not classified as federal property, property of a constituent entity of the Russian Federation or municipal property, located

- in the territories of the specified constituent entities of the Russian Federation”], Dec. 28, 2022, https://www.consultant.ru/document/cons_doc_LAW_436226/https://www.consultant.ru/document/cons_doc_LAW_436226/, last accessed Jan. 16, 2025.
63. **F1691.** Decree of the Luhansk People's Republic 632/22 “Об утверждении Порядка обращения недвижимого имущества в государственную собственность Луганской Народной Республики, а также выплаты собственникам компенсации стоимости обращенного в государственную собственность недвижимого имущества” [“On Approval of the Procedure for conversion of immovable property into state ownership of the Luhansk People's Republic, and payment of compensation to owners for the cost of immovable property converted into state ownership”], Aug. 22, 2022, <https://sovminlnr.ru/akty-soveta-ministrov/postanovleniya/29254-ob-utverzhdenii-poryadka-obrascheniya-nedvizhimogo-imuschestva-v-gosudarstvennyu-sobstvennost-luganskoy-narodnoy-respubliki-a-takzhe-vyplaty-sobstvennikam-kompensacii-stoimosti-obraschennogo-v.html>, last accessed Sep. 30, 2024.
 64. *Ibid.*
 65. **F1692.** Law of the Luhansk People's Republic 414-III “Об особенностях регулирования имущественных и земельных отношений на территории Луганской Народной Республики” [“On Peculiarities of Regulation of Property and Land Relations on the Territory of the Luhansk People's Republic”], Sep. 28, 2022, <https://nslnr.su/upload/medialibrary/f18/414-III%2028.09.2022%2006%20особенностях%20регулирувания%20имущественных%20и%20земельных%20отношений%20на%20территории%20ЛНР.pdf>, last accessed Sep. 30, 2024.
 66. Convention (IV) respecting the Laws and Customs of War on Land and its annex: Regulations Concerning the Laws and Customs of War on Land. The Hague, Oct. 18, 1907, Hague Regulations, Art. 43. See also Art. 64 GC IV, which provides that the penal laws of the occupied territory shall remain in force. However, the scope of the obligation remains identical as provided for under Art. 43 of the 1907 Hague Regulations and extends to any legislation in force on the occupied territory. See further in Y. Dinstein, *The International Law of Belligerent Occupation*, 110; ICRC 1958 Commentary, 335.
 67. Y. Dinstein, *Legislation Under Article 43 of the Hague Regulations: Belligerent Occupation and Peacebuilding*, 2004, p. 10.
 68. See Art. 64 GC IV.
 69. Convention (IV) respecting the Laws and Customs of War on Land and its annex: Regulations concerning the Laws and Customs of War on Land. The Hague, Oct. 18, 1907, Hague Regulations, Art. 45; Y. Dinstein, *Legislation Under Article 43 of the Hague Regulations: Belligerent Occupation and Peacebuilding*, 2004, p. 11.
 70. “Президент РФ Владимир Путин подписал указ про спрощенное надання російського громадянства українським громадянам, які народилися та проживали в Криму, в Луганській і Донецькій областях” [“Russian President Vladimir Putin signs a decree on simplified granting of Russian citizenship to Ukrainian citizens born and residing in Crimea, Luhansk and Donetsk regions”], *Espresso TV*, May 1, 2019, <https://espresso.tv/news/2019/05/01/putin-pidpysav-ukaz-pro-vydachu-pasportiv-rf-ukrayincyam-iz-krymu-ta-z-donbasu>, last accessed Dec. 18, 2024.
 71. “Терористи “ЛНР” змушують підприємців отримувати російські “паспорти,” - місцеві жителі” [“LPR terrorists force entrepreneurs to get Russian “passports” - local residents”], *Espresso TV*, Oct. 30, 2019, <https://espresso.tv/news/2019/10/30/terorysty-quotlnrquot-zmushuyut-pidpryemciv-otrymuvaty-rosiyski-quotpasportyquot-miscevi-zhyteli>, last accessed Dec. 18, 2024.
 72. “На окупованій Луганщині тиснуть на бізнес. Шукають найманих працівників, які не мають паспорта РФ” [“Businesses in the occupied Luhansk region are under pressure. They are looking for employees who do not have a Russian passport”], *Svatove city*, Oct. 23, 2024, <https://svatove.city/articles/region/2>, last accessed Dec. 18, 2024.
 73. Convention (IV) respecting the Laws and Customs of War on Land and its annex: Regulations concerning the Laws and Customs of War on Land. The Hague, Oct. 18, 1907, Hague Regulations, Art. 45.
 74. Yoram Dinstein, *Legislation Under Article 43 of the Hague Regulations: Belligerent Occupation and Peacebuilding*, p. 11 (2004).
 75. Article 55 of the 1907 Hague Convention.
 76. Dinstein, *The International Law of Belligerent Occupation*, 213.
 77. **F1679.** Law of the Luhansk People's Republic №36-I “Об управлении и распоряжении собственностью Луганской Народной Республики” [“On the management and disposal of property of the Luhansk People's Republic”], Nov. 4, 2014, <https://nslnr.su/zakonodatelstvo/normativno-pravovaya-baza/635/>, Art. 1, Part 2, para. 2, last accessed Sep. 30, 2024. The definition of nationalized property closely resembles the one in a similar resolution issued in Crimea on April 30, 2024, valid during its rather short interim period until

- January 1, 2015, and defined in its Federal Constitutional Law №6-FKZ “On the Admission of the Republic of Crimea to the Russian Federation and the Formation of New Subjects within the Russian Federation - the Republic of Crimea and the Federal City of Sevastopol,” March 21, 2014, <https://www.prlib.ru/en/node/353509>, last accessed Sep. 30, 2024.
78. See <https://sovminlnr.ru/akty-soveta-ministrov/rasporyazheniya/page/14/>, last accessed Sep. 30, 2024.
 79. This term is usually used to describe the actions of one state/entity against the interests of another state.
 80. **F1692.** Law of the Luhansk People's Republic №414-III “Об особенностях регулирования имущественных и земельных отношений на территории Луганской Народной Республики” [“On Peculiarities of Regulation of Property and Land Relations on the Territory of the Luhansk People's Republic”], Sep. 28, 2022, <https://nslnr.su/upload/medialibrary/f18/414-III%2028.09.2022%2006%20особенностях%20регулирования%20имущественных%20и%20земельных%20отношений%20на%20территории%20ЛНР.pdf>, last accessed Oct. 30, 2024.
 81. See Extract from RusProfile on LPR Ministry of Agriculture and Food <https://www.rusprofile.ru/id/1229400032938>, last accessed Jan. 16, 2025.
 82. See Extract from RusProfile on the State Unitary Enterprise “Agrarian Fund,” <https://www.rusprofile.ru/id/1229400066070>, last accessed Jan. 16, 2025.
 83. See Extract from RusProfile on State Unitary Enterprise “Regional Agrarian Holding of the Luhansk People's Republic,” <https://www.rusprofile.ru/id/1229400023258>, last accessed Jan. 16, 2025.
 84. See Extract from RusProfile on Municipal Unitary Enterprise “STAROBILSK ELEVATOR,” <https://www.rusprofile.ru/id/1229400033444>, last accessed Jan. 16, 2025.
 85. **F1679.** Law of the Luhansk People's Republic №36-I “Об управлении и распоряжении собственностью Луганской Народной Республики” [“On the management and disposal of property of the Luhansk People's Republic”], Nov. 4, 2014, <https://nslnr.su/zakonodatelstvo/normativno-pravovaya-baza/635/>, Art. 1, Part 2, para. 2, last accessed September 30, 2024. The definition of nationalized property closely resembles the one in a similar resolution issued in Crimea on April 30, 2024, valid during its rather short interim period until January 1, 2015, defined in its Federal Constitutional Law №6-FKZ “On the Admission of the Republic of Crimea to the Russian Federation and the Formation of New Subjects within the Russian Federation - the Republic of Crimea and the Federal City of Sevastopol,” Mar. 21, 2014, <https://www.prlib.ru/en/node/353509>, last accessed Sep. 30, 2024.
 86. See <https://sovminlnr.ru/akty-soveta-ministrov/rasporyazheniya/page/14/>, last accessed Sep. 30, 2024.
 87. Articles 23(g) of the 1907 Hague Convention.
 88. Article 46 of the 1907 Hague Convention.
 89. Articles 28 and 47 of the 1907 Hague Convention; Article 33 of the Fourth Geneva Convention.
 90. See e.g. ICTR Statute, Art. 4(f), ICTY Statute, Art. 3(e), SCSL Statute, Art. 3(f).
 91. See First declaration of Ukraine lodged under Article 12(3) of the Rome Statute, Apr. 9, 2014, <https://www.icc-cpi.int/sites/default/files/itemsDocuments/997/declarationRecognitionJurisdiction09-04-2014.pdf>, last accessed May 9, 2024; Second declaration of Ukraine lodged under Article 12(3) of the Rome Statute, Sep. 8, 2015, https://www.icc-cpi.int/sites/default/files/iccdocs/other/Ukraine_Art_12-3_declaration_08092015.pdf, last accessed May 9, 2024. See also ICC, Situation in Ukraine, <https://www.icc-cpi.int/situations/ukraine>, last accessed May 9, 2024.
 92. Statement of ICC Prosecutor, Karim A.A. Khan QC, on the Situation in Ukraine: Receipt of Referrals from 39 States Parties and the Opening of an Investigation, Mar. 2, 2022, <https://www.icc-cpi.int/news/statement-icc-prosecutor-karim-aa-khan-qc-situation-ukraine-receipt-referrals-39-states>, last accessed May 9, 2024; For more information on pillage as a war crime, see PEJ Pillage Handbook, published on xx, at xx.
 93. <https://asp.icc-cpi.int/states-parties/eastern-european-states/ukraine>, last accessed Feb. 19, 2025.
 94. Article 8(2)(b)(xvi) of the Rome Statute.
 95. This term refers to any property belonging to individuals or entities who are aligned with or whose allegiance is to a party to the conflict who is adverse or hostile to the perpetrator, whether military or civilian: ICC, *The Prosecutor v. Germain Katanga and Mathieu Ngudjolo Chui* (ICC-01/04-01/07), Decision on the confirmation of charges, Pre-Trial Chamber II, September 30, 2008, § 329.
 96. Article 8(2)(b)(xiii) of the Rome Statute.
 97. As widely acknowledged from the very first moments of the full-scale invasion: e.g., <https://www.icrc.org/en/document/statement-icrc-president-peter-maurer-conflict-ukraine>.
 98. International Court of Justice, *Legal Consequences for States of the Continued Presence of South Africa in Namibia (South*

West Africa) notwithstanding Security Council Resolution 276, Advisory Opinion of Jun. 21, 1971, I.C.J. Reports, para 125 (1971), in which the ICJ held that non-recognition of South Africa's authority in Namibia, given the termination of its mandate to administer the territory, meant that any acts purporting to be "official" government acts were invalid (with certain exceptions).

99. IMT, *United States of America against Alfred Krupp, et al.*, Jul. 3., 1948, p. 1345.
100. See Extract from RusProfile on LPR Ministry of Agriculture and Food <https://www.rusprofile.ru/id/1229400032938>.
101. See Extract from RusProfile on the State Unitary Enterprise "Agrarian Fund," <https://www.rusprofile.ru/id/1229400066070>, last accessed Jan. 15, 2025.
102. See Extract from RusProfile on State Unitary Enterprise "Regional Agrarian Holding of the Luhansk People's Republic," <https://www.rusprofile.ru/id/1229400023258>, last accessed Jan. 15, 2025.
103. See Extract from RusProfile on Municipal Unitary Enterprise "STAROBILSK ELEVATOR," <https://www.rusprofile.ru/id/1229400033444>, last accessed Jan. 15, 2025.
104. ICC, Bemba Judgment pursuant to Article 74 of the Statute, para 120, (Mar. 21, 2016).
105. ICTY, Delalić et al. Judgment, para 591 (Nov. 16, 1998).
106. ICC, Bemba Judgment pursuant to Article 74 of the Statute, para 116, (Mar. 21, 2016).
107. Witness account (P0162 Aug. 27, 2024).
108. **F1693**. Eva Pozdniakova, "Грабіжницька хвиля. Що є в списках майна, яке 'віджало' угруповання 'ЛНР,'" ["Robbery wave. What is in the lists of property that was 'stung' by the 'LPR' group"], Jul. 13, 2023, <https://realgazeta.com.ua/hrabizhnytska-khvyliya-shcho-ie-v-spyskakh-mayna-i-ake-vidzhalo-uhrupuvannia-lnr/>, last accessed Oct. 30, 2024. See also footnote 25 above.
109. *Ibid.*
110. See ICTY, *Prosecutor v Kordić & Čerkez* (IT-95-14/2), Trial Judgment, para 341, referring to "property protected by the Geneva Convention, on account of its location in occupied territory."
111. "2.1 State registration of rights to immovable property and their encumbrances is mandatory. In the course of state registration of rights, information on registered property rights to immovable property and their encumbrances shall be entered in the Books of Registration" See Decree №404 "Об утверждении Временного положения о порядке государственной регистрации прав на недвижимое имущество, их обременений и предоставления информации" ["On Approval of the Temporary Regulations on the Procedure for State Registration

of Rights to Immovable Property, their Encumbrances and Provision of Information"], Aug. 2, 2016, https://sovminlnr.ru/docs/2022/04/28/doc_404.pdf, last accessed Jan. 20, 2025. "[...]Property owned by the Luhansk People's Republic shall be recorded. Record keeping of the state property of the Luhansk People's Republic shall include receipt, examination, storage of documents containing information on the state property of the Luhansk People's Republic [...]" See Law №90-I "Об управлении и распоряжении собственностью Луганской Народной Республики" ["On Management and Disposal of Property of the Lugansk People's Republic"], Sep. 27, 2024, <https://nslnr.su/zakonodatelstvo/normativno-pravovaya-baza/23262/>, last accessed Jan. 20, 2025; See **F1679**. Law of the Luhansk People's Republic №36-I "Об управлении и распоряжении собственностью Луганской Народной Республики" ["On the management and disposal of property of the Luhansk People's Republic"], Nov. 4, 2014, <https://nslnr.su/zakonodatelstvo/normativno-pravovaya-baza/635/>, last accessed Sep. 30, 2024. See also <https://sovminlnr.ru/akty-soveta-ministrov/rasporiazheniya/page/14/>, last accessed Sep. 30, 2024; **F1690**. Law of the Luhansk People's Republic №402-III "Об обращении недвижимого имущества в государственную собственность" ["On Conversion of Immovable Property into State Ownership"], Aug. 4, 2022, <https://nslnr.su/zakonodatelstvo/normativno-pravovaya-baza/18560/?ysclid=ly5ijtq6y905479930>, last accessed Sep. 30, 2024; **F1691**. Decree of the Luhansk People's Republic №632/22 "Об утверждении Порядка обращения недвижимого имущества в государственную собственность Луганской Народной Республики, а также выплаты собственникам компенсации стоимости обращенного в государственную собственность недвижимого имущества," ["On Approval of the Procedure for conversion of immovable property into state ownership of the Luhansk People's Republic, and payment of compensation to owners for the cost of immovable property converted into state ownership"], Aug. 22, 2022 <https://sovminlnr.ru/akty-soveta-ministrov/postanovleniya/29254-ob-utverzhenii-poryadka-obrascheniya-nedvizhimogo-imuschestva-v-gosudarstvennuyu-sobstvennost-luganskoy-narodnoy-respubliki-a-takzhe-vyplaty-sobstvennikam-kompensacii-stoimosti-obraschennogo-v.html>, last accessed Sep. 30, 2024; **F1692**. Law of the Luhansk People's Republic №414-III "Об особенностях регулирования

- имущественных и земельных отношений на территории Луганской Народной Республики” [“On Peculiarities of Regulation of Property and Land Relations on the Territory of the Luhansk People’s Republic”], Sep. 28, 2022, <https://nslnr.su/upload/medialibrary/f18/414.pdf>, last accessed Oct. 30, 2024.
112. **F1701.** Luhansk information center, “Вывоз зерна из освобожденных районов в РФ будет осуществляться через новые ПП – Минсельхоз” [“Export of grain from the liberated regions to the Russian Federation will be carried out through new checkpoints — Ministry of Agriculture”], Apr. 28, 2022, <https://lug-info.com/news/vyvoz-zerna-iz-osvobozhdennyh-rajonov-v-rf-budet-osushchestvlyat-sya-cherez-novye-pp-minsel-hoz>, last accessed Sep. 30, 2024.
 113. **F1683.** Council of Ministers of the LPR Resolution №704, Dec. 14, 2016, <https://sovminlnr.ru/akt/16.12.2016/704.pdf>, last accessed Sep. 30, 2024.
 114. **F1684.** Council of Ministers of the LPR Resolution No. XX, 2017 <https://sovminlnr.ru/docs/2018/01/19/12.pdf>, last accessed Oct. 30, 2024.
 115. “Неснижаемый запас зерна будет храниться на госэлеваторах – председатель Правительства” [“Minimum grain reserves to be stored at state elevators – Prime Minister”], *Lug Info*, Aug. 7, 2019, <https://lug-info.ru/news/nesnizhaemyi-zapas-zerna-budet-khranitsya-na-goselevatorakh-predsedatel-pravitelstva-foto-47542/>, last accessed Oct. 30, 2024.
 116. Art. 52 of the 1907 Hague Convention. See also Dinstein, *The International Law of Belligerent Occupation*, 2nd ed., 228.
 117. Art. 52 of the 1907 Hague Convention.
 118. Art. 55(2) GC IV.
 119. Witness account (P0160 Aug. 24, 2024).
 120. Records available at <https://zakupki.gov.ru/epz/contractfz223/search/results.html?searchString=9402009401>.
 121. See Chapter 6, “Farmers forced to sell grain at rock-bottom prices” in [title of PEJ’s Zaporizhzhia report], [month] 2025, [hyperlink](#).
 122. Witness account (P024 May 24, 2023); Witness account (P011 Jan 1, 2023 and May 4, 2023), Witness account (P023, May 18, 2023).
 123. In one particular case, in the village of Ulyanivka, occupying authorities reportedly ordered farmers to bring their grain to a specified location to be purchased at a marginal price, only to have their grain confiscated.
 124. US Military Tribunal Nuremberg, *United States of America vs. Carl Krauch et al.* (I.G. Farben Trial), Judgment of July 30, 1948, p. 44.
 125. “Служба безпеки України,” transliterated as Sluzhba Bezpeky Ukrainy, is the Security Service of Ukraine.
 126. “Как это было. Год назад 07.04.2014 в Донецке провозгласили ‘ДНР’” [“How it was. One year ago, on 07.04.2014, the ‘DNR’ was proclaimed in Donetsk”], *LiveJournal*, Apr. 15, 2023, <https://serzzze.livejournal.com/12837.html>, last accessed Nov. 29, 2024.
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