

REPORT

REPORT

JANUARY-JUNE 2019



NATIONAL ANTI-CORRUPTION BUREAU OF UKRAINE: RESULTS AND CHALLENGES



LAW OF UKRAINE ON THE NATIONAL ANTI - CORRUPTION BUREAU OF UKRAINE

2. Director of the National Bureau: <...>

2.2 annually by February 10 and August 10 provides the President of Ukraine, Parliament of Ukraine and the Cabinet of Ministers of Ukraine with a written report on the National Bureau activities for the previous 6 months period.

3. The written report on the National Bureau activities should contain the following information:

3.1 statistical data on the results of activities with mandatory reference to the:

number of applications and reports on criminal offences in terms of criminal offences classified by the law as those under jurisdiction of the National Bureau;

number of investigations initiated by the National Bureau and their results;

number of people standing indicted for committing criminal offences classified by the law as those under jurisdiction of the National Bureau;

number of people officially found guilty of committing criminal offences classified by the law as those under jurisdiction of the National Bureau;

ARTICLE 26.

CONTROL OF THE NATIONAL BUREAU ACTIVITIES AND ITS ACCOUNTABILITY

number of people officially declared innocent of committing relevant criminal offences;

information by categories of people indicated in part 1 of the Law of Ukraine "On preventing corruption";

information on the amount of loss and damage from criminal offences classified by the law as those under jurisdiction of the National Bureau, state and amount of compensation;

information on funds and other property acquired as a result of criminal offences classified by the law as those under jurisdiction of the National Bureau, confiscated by court order, funds amounting to value of illegally received services and benefits, forfeited to the state, and their use;

information on funds and other property acquired as a result of criminal offences classified by the law as those under jurisdiction of the National Bureau, recovered from abroad, and their keeping;

information on seizure of property, confiscation of objects and proceedings acquired as a result of criminal offences classified by the law as those under jurisdiction of the National Bureau, and their use;

number of submissions made as to the elimination of causes and conditions contributing to committing criminal offences;

results of the character tests;

3.2 cooperation with other public authorities, local authorities, companies, organizations and establishments;

3.3 cooperation with competent foreign authorities, international and foreign organizations and signing agreements on cooperation and representing interests abroad;

3.4 cooperation with NGOs and mass media;

3.5 number of the National Bureau employees, their qualification, work experience and further training;

3.6 work of the National Bureau Internal Control Department; number of reports on offences committed by the National Bureau employees, investigation results and bringing to justice;

3.7 budget of the National Bureau and its execution;

3.8 other information concerning the results of the National Bureau activities its duties.

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ABOUT THE BUREAU



CREATION

On October 14, 2014, the Verkhovna Rada of Ukraine adopted the Law “On the National Anti-Corruption Bureau of Ukraine” No. 1698-VII. On April 16, 2015 the President of Ukraine Petro Poroshenko signed two Decrees – No. 217/2015 on the establishment of the National Anti-Corruption Bureau of Ukraine and No. 218/2015 on the appointment of Artem Sytnyk as Director of the Bureau. This created the new government agency.



EXECUTIVES

Director – Artem Sytnyk
First Deputy Director – Gizo Uglava
Deputy Director – Anatoly Novak
Deputy Director – Tetiana Varvarska

THE NABU MISSION

**Cleansing government of corruption in order
to enable formation and development of
successful society and efficient state**

UNIQUENESS

The NABU is the first law-enforcement agency in independent Ukraine created from scratch.

All employees, other than deputy directors, are appointed exceptionally through an open competition.

The NABU formed the Civil Oversight Council, whose members (15 people) are selected annually through an online-voting.

Detective is a new position in Ukraine which combines the functions of a field officer and an investigator.

The NABU also set up the Information Processing and Analysis Department which has no parallel in Ukraine.

Both detectives and analysts have access to more than 100 key state registers and databases and use them in their work.

Within eight months since the establishment of the Bureau detectives entered data on the first criminal offences in the Unified Register of Pre-Trial Investigations and started investigations.



Artem Sytnyk

Director of the National
Anti-Corruption Bureau of Ukraine

For the National Bureau and the fight against corruption in general past 6 months have become a period of challenges, both internal and external. We became stronger: we improved internal organizational processes and for the first time in Ukraine received certificate, that confirms compliance with the anti-bribery management system according to the requirements of the international standard ISO 37001: 2016.

At the same time, not only the NABU and the SAPO, but also the entire Ukrainian society, were kept in suspense by external challenges. In the midst of the election campaign, the Constitutional Court of Ukraine began to deprive us of effective anti-corruption mechanisms. Due to Court's decision an article on illegal enrichment was declared unconstitutional, the National Bureau lost the authority to invalidate illegal agreements in court, found by the Detectives during criminal investigations.

However, year by year, the NABU and the SAPO prove that fight against corruption in Ukraine is still possible. A vivid confirmation of this is growing number of suspects and defendants. Past six months were no exception. Except for officials brought to justice, thanks to the work of the NABU Detectives and the SAPO Prosecutors more than 115 million UAH were returned to the state. We managed to reveal a number of corruption schemes in strategically important areas for the state – the defense industry, fuel and energy complexes.

Unfortunately, the consideration of cases submitted by the NABU and the SAPO to the court, slowed down. Due to pending start of the work of the High Anti-Corruption Court. I hope this will change in autumn. I am convinced that the newly elected government will not change the course of Ukraine in its fight against corruption and introduce effective mechanisms for this: it will grant the NABU with authority to wiretap independently, will return responsibility for illegal enrichment, and abolish deputy immunity.

I thank the Detectives and the Prosecutors for their work and effective investigations. I express gratitude to our international partners for their support in the implementation of anti-corruption reform, to media and civil society for their constructive position and cooperation.

The fight goes on!

I would like to thank the Detectives of the National Anti-Corruption Bureau of Ukraine and the Prosecutors of the Specialized Anti-Corruption Prosecutor's Office, who continue to perform their duties faithfully and prevent corruption crimes despite all the negativity and societal pressure.

Despite populist claims accusing Prosecutors and Detectives of inaction, our achievements show the opposite. In just six months, the anti-corruption authorities have launched more than 600 proceedings concerning numerous cases of abuse in the public sector that caused billions in damage. Such odious officials as the mayor of Odesa and deputies on the Kyiv City Council and Poltava Oblast Council, as well as ministers, judges, Members of Parliament, law enforcement officers, and executives of state-owned enterprises were given notices of suspicion, and indictments as of them were sent to court. This indicates that the post itself does not play an important role and does not a priori lead to immunity and impunity.

We do not work for likes on social media but for the sake of overcoming corruption. After all, the fight is relevant exactly because the very phenomenon of corruption has a negative effect on economy and exacerbates social crises in general.

Indeed, February 2019 was a turning point, as the Constitutional Court of Ukraine declared unconstitutional Article 368-2 of the Criminal Code of Ukraine, which provided for criminal liability for illicit enrichment. This led to the closure of 65 cases involving deputies, police officers, judges, heads of city councils, and other officials.

The ruling made the issue of legislative regulation of criminal liability for illegal enrichment all the more relevant. At this particular time, the task groups of prosecutors of the Anti-Corruption Prosecutor's Office are working on means to improve Ukrainian laws, bring them in line with constitutional provisions, and implement anti-corruption policy in general.

We have much work, many cases, and many investigations ahead of us. I am grateful for both criticism and support in these difficult times of change and reform! I believe that a common goal is the key to success and victory!



Nazar Kholodnytskyi

Head of the Specialised
Anti-Corruption Prosecutor's Office

According to 62% of Ukrainians, the anti-corruption reform is the most important one, even more so than the healthcare and social security reforms. Additionally, 51% of Ukrainians believe that overcoming corruption is strategically important for Ukraine's development in the next 10 years. Meanwhile, foreign investors note that "widespread corruption" and "distrust of the judicial system" hamper the development of the Ukrainian economy. They estimate that these factors have the strongest impact on the investment climate with 8.3 and 8.2 points out of 10. This is one more proof of how urgent it is for the newly created anti-corruption institutions to work effectively.

The dynamics of socio-political views in Ukraine. – June, 2019. – SG "Rating"; A regular survey of foreign investors. Special issue. – April 2019 – EBA, Dragon Capital, CES; What priority reforms are waiting for citizens. – June 13-20, 2019 – Democratic Initiatives Foundation and the Razumkov Center.



GIZO UGLAVA

First Deputy Director of the National Bureau:

The National Bureau became the first law enforcement agency in Ukraine to use the best international practices and set trends. In four years since the Bureau's foundation, we have been proving the professionalism of our team and independence of our investigations on a daily basis. Neither elections, nor manipulative statements of certain politicians had any effect on the disclosure of corrupt schemes by the NABU Detectives.

For even faster and more efficient operation, we continue to automate processes. This includes internal assessment, employee competency development model, and internal document management. The next step is the implementation of e-Case management system.



ANATOLY NOVAK

Deputy Director of the National Bureau:

Fight against corruption is impossible without a strong and motivated team. The National Bureau works every day to ensure that its employees have sufficient physical and intellectual strength for effective work, the results of which are shared with the public.

Three Territorial Offices of the NABU actively involve public organisations and young people in the fight against corruption. Meanwhile, the anti-corruption special operations unit — not only the Special Operations Department, but also all other structural units actively involved in day-to-day work — is an integral part of our team, which aims to clear the government of corruption for the sake of building and developing a successful society and an effective state.

TETIANA VARVARSKA

Deputy Director of the National Bureau:

With each passing year, the National Anti-Corruption Bureau of Ukraine is improving its material and technical capabilities. Thanks to international partners and government funding, the NABU employees have everything they need to work. This includes up-to-date equipment and software, as well as the opportunity to participate in international visits, learn from foreign colleagues, and share their own experience. To create comfortable conditions for work against corruption, repairs to the premises of the Territorial Offices of the National Bureau in Lviv and Odesa are planned this year.





RESULTS



National Bureau is an effective
pre-trial investigation body that
exposes corrupt schemes and brings
top-officials to justice

KEY EVENTS

JANUARY

Notices of suspicion were given to ex-Head of the SE "Ukrkosmos" and to 8 persons involved in 98 mln UAH funds embezzlement of the PJSC "Ukrzaliznytsia". Among suspects there is an assistant to a Member of Parliament of Ukraine. The investigation as of failure to declare assets by ex-Head of the State Environmental Inspectorate of Ukraine was completed. In the same month, the SAPO sent an indictment as of prosecutor of the PGO to court. He is accused of receiving 15 thous. USD of improper advantage. Based on a claim filed by the NABU, the Commercial Court of Kyiv declared the agreement signed by the SE "USPA" on dredging works for a total amount of 290 mln UAH invalid.

01

02

Ex-Head of the SE "Ukrtefilm" and ex-secretary of Kyiv City Council Land Committee were exposed on involvement in corrupt schemes related to real estate. The investigations as of causing damage to the SE "Ukrkosmos" and one of the episodes of "SFGCU case" were completed. Cases as of the facts of embezzlement of funds of Odesa CHP and Zolotonosha Sewer Collector; funds allocated on dugouts in the JFO Zone and for the temporary accommodation and resettlement of IDPs.; as of MP who organized the "gas scheme", the Minister of Infrastructure, and a former SSU official were sent to court. In cooperation with the law enforcement authorities of the United Kingdom, 297 thous. USD belonging to an accused ex-Head of the SFS were seized. The Supreme Court confirmed that the PJSC "Ukrnafta" had no legal grounds for supplying oil without advance payment, which served as the basis for the cancellation of transactions.

FEBRUARY

MARCH

Nine current and former officials of the National Academy of Sciences of Ukraine were exposed to be involved in the misappropriation of 15 ha of valuable land. The Odesa Mayor was exposed on failing to declare his assets. Notices of suspicion were given to former and current directors of the SE "SpetsTekhnoExport" (part of SE "Ukroboronprom"). The investigation as of corrupt schemes involving ex-Heads of the SE "Aviakon" was completed. The Supreme Court supported the NABU position on the cancellation of the contract of the SE "Krasnolymanska" for the supply of 65 thous. tonnes of coal. However, the Constitutional Court ordered the closure of all criminal proceedings on illegal enrichment.

03



MAY

Notices of suspicion were given to ex-Commander-in-chief of the National Guard and 2 his accomplices in misappropriation of assets of the National Guard amounting to 81.64 mln UAH. The Head of branch of "Ukrzaliznytsia" and his Deputy were given notices of suspicion within the case as of purchasing fuel from the LLC "Wog Aero Jet". The investigation as of the purchase of turnouts equipment by "Ukrzaliznytsia", which resulted in 93 mln UAH damage caused to state, was completed. The NABU completed investigations as of 1.75 mln UAH misappropriation of "Mykolaivoblenerho" as well as of 3 employees of the National Police in Kyiv exposed on receiving 50 thous. USD of improper advantage. An indictment as of 8 persons involved in embezzlement of funds of "Derzhinvestproekt" was sent to court. Based on the claim of the NABU, the court annulled the illegal agreement on sale of 649 thous. tonnes of coal at a reduced price by the SE "Krasnolymanska".



04

05

Two judges exposed on receiving improper advantage were brought to liability: the judge of Malynovskyi District Court of Odesa was given a notice of suspicion, the indictment as of the judge of Cherkasy Oblast Court of Appeal was sent to court. The Director General of the SSE "Chornobyl Specialised Integrated Plant" was exposed on nearly 1 mln UAH embezzlement. The investigations as of corrupt schemes at the SE "Ukrtefilm" and those involving land in Kyiv were completed. The Chairman of the Board of the PJSC "HC "Enerhomerezh", suspected of causing more than 346 mln UAH damage to state was extradited from Germany to Ukraine.

APRIL

06

A judge from Sumy Oblast was exposed on receiving an improper advantage. The investigation as of judge from Zakarpattia was completed. The investigations as of Odesa Mayor and the so-called "Ukrainian Wall Project case" were completed. The NABU helped the AMCU to expose a conspiracy of the participants in the tender for the repair of Shuliavskiy Bridge in Kyiv. Due to the decision of the Constitutional Court, the NABU lost the authority to file claims on cancellation of illegal agreements. The NABU was supported by the Supreme Court, which confirmed the legality of the cancellation of illegal agreement for a total amount of 712 mln UAH.

JUNE

INVESTIGATION

In the first half of 2019, the NABU and the SAPO continued their investigation as of corruption in state-owned enterprises, primarily in the fuel and energy sector and the defence industry

In January–June 2019, the Detectives have started investigating 533 criminal proceedings. Most of them concern theft of property or damage to state-owned enterprises, where the share of the state or communal ownership exceeds 50% of the authorised capital.

More than 60 proceedings related to abuse of office at enterprises belonging to the fuel and energy sector or the defence industry. Examples of such cases, where notices of suspicion have already been given to persons, are the embezzlement of 2.225 mln USD (55.5 mln UAH) of the state-owned company “SpetsTekhnoEksport” (falls within the scope of the state-owned concern “Ukroboronprom”), misappropriation of the property of the General Directorate of the National Guard of Ukraine worth 81.640 mln UAH, 8.600 mln UAH embezzlement of the subsidiary “Tsentrhaz” (part of the OJSC “Kirovohradhaz”).

Abuses of officials of local authorities were also in the focus of attention of the Detectives of the National Anti-Corruption Bureau of Ukraine. The investigations as of the mayor of Odesa (as of the facts of failure to declare assets) and the former secretary of the Kyiv City Council Land Committee were completed.

Overall, the NABU Detectives investigate 745 criminal proceeding as of corruption-related offences that fall under the competence of the National Bureau.

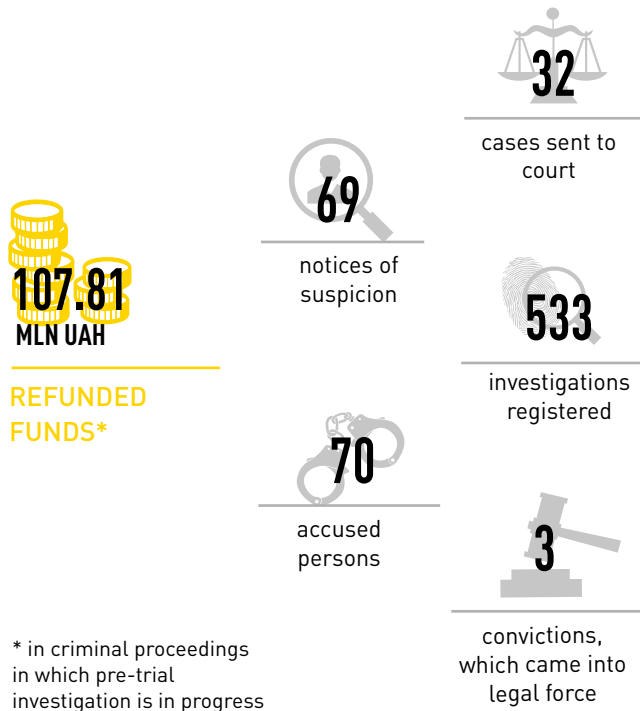
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**CRIMINAL
PROCEEDINGS**

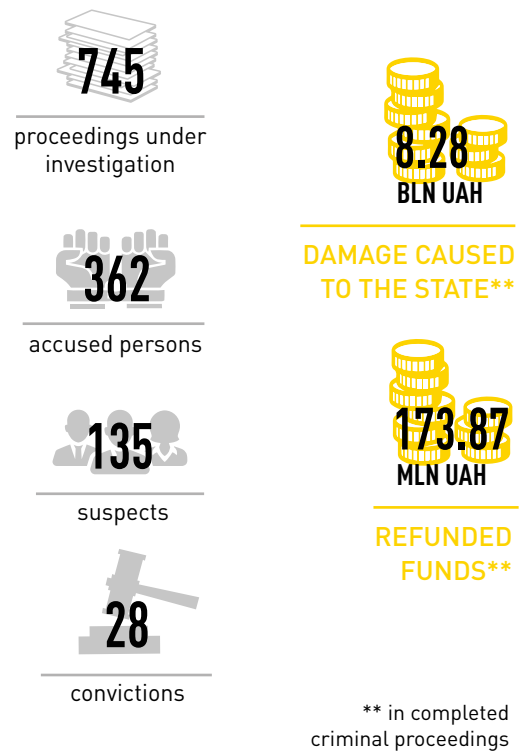
on average are
investigated by
one unit of 12
NABU Detectives

NABU AND SAPO ACTIVITIES: RESULTS OF THE FIRST HALF OF 2019

(from 01.01.2019 till 30.06.2019)



(as of 30.06.2019)



CLAIMS WORK

(from 01.01.2019 till 30.06.2019)



PROSECUTED PERSONS

In the first half of 2019, the number of individuals brought to justice by the NABU Detectives and the SAPO Prosecutors was three times more than in the previous reporting period

In the first six months of 2019, the NABU Detectives and the SAPO Prosecutors brought to justice 139 individuals, which is 34 more than in the last half-year. Additionally, 70 individuals were accused in the reporting period. As before, executives of companies, where the share of the state or communal ownership exceeds 50% of the authorised capital are the most numerous among those exposed on corruption. In January-June 2019, 18 such officials were given notices of suspicion; indictments as of four officials were sent to court. Among them there are former and current Heads of state-owned enterprises in the defence industry, fuel and energy sector, and the agricultural industry. Officials of the National Academy of Agrarian Sciences of Ukraine were brought to justice for the misappropriation of especially valuable land.

The most common crime the officials under investigation by the NABU were charged with was embezzlement, conversion or misappropriation of property by abuse of office (Article 191 of the Criminal Code of Ukraine) – 80% of recorded corrupt actions of the suspects fell under this category. The second most “popular” crime is abuse of office or position (Article 364 of the Criminal Code of Ukraine). One in every five corruption offences recorded by the NABU Detectives was committed under such circumstances.

18

HEADS

of state-owned enterprises were given notices of suspicion in the first half of 2019

PROSECUTED PERSONS

BREAKDOWN OF SUSPECTED PERSONS (REMAINING) AND INDICTMENTS SENT TO THE COURT

[from 01.01.2019 till 30.06.2019]

Number of suspects		Number of accused
18	Heads of state enterprises in the authorized capital of which the participation interests of state or communal property exceeds 50%	4
7	Public officials, law enforcement officers, local self-governments officials who have committed corruption crimes, and it caused damage to the state which exceeds the living wage for employable persons by 500 times	2
2	Military officers in the high command of the Armed Forces of Ukraine, the SSU, the State Border Guard Service of Ukraine, the National guard of Ukraine, and other military units formed	0
2	Judges at all levels	4
1	Senior officials of the state (the Prime Minister, ministers and their deputies, Members of Parliament of Ukraine etc.)	2
39	Other (individuals, lawyers)	38
0	Officials of the legal entities of public law	9
0	Heads of large enterprises	6
0	Members of regional council, city councils of Kyiv and Sevastopol	2
0	Prosecutors	2
0	Public officials, local self-governments officials falling within the A Category	1

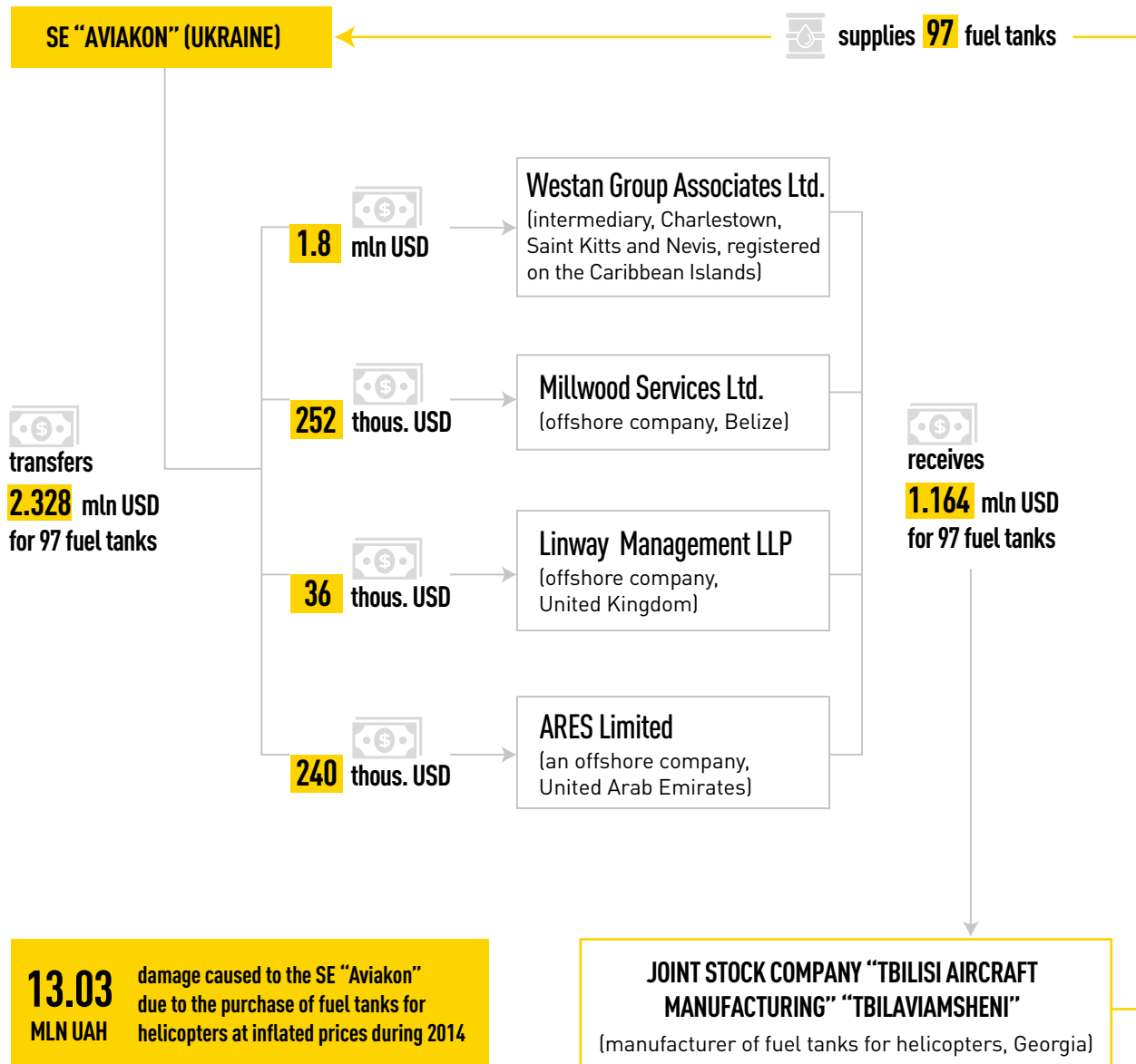
BREAKDOWN OF SUSPECTED PERSONS (REMAINING) AND INDICTMENTS ACCORDING TO THE ARTICLES OF CRIMINAL CODE OF UKRAINE*

[as of 30.06.2019]

*in relation to all persons in all episodes

Notices of suspicion	Qualification*	Indictments
84%	Article 191	17%
0%	Article 206-2	0%
13%	Article 209	5%
0%	Article 210	2%
0%	Article 211	0%
0%	Article 354	1%
23%	Article 364	8%
1%	Article 366-1	5%
8%	Article 368	16%
0%	Article 368-2	1%
2%	Article 369	5%
2%	Article 369-2	6%
1%	Article 410	0%
50%	Other	37%

COMPLETED INVESTIGATIONS



CAUSING 13 MLN UAH DAMAGE TO THE SE “KONOTOP AIRCRAFT REPAIR PLANT “AVIAKON” (PART OF THE SC “UKROBORONPROM”)

Suspects

- ex-Director of the SE “Aviakon” (P. 2 Art. 364 of the CC of Ukraine)
- ex-Deputy Director of the SE “Aviakon” (P. 2 Art. 364 of the CC of Ukraine)
- Commercial Director of Westan Group Associates Ltd. (P. 5 Art. 27 P. 2 Art. 364 of the CC of Ukraine)

Key events


14.11.2016 investigation started	21.11.2018 notices of suspicion were given to the ex- officials of the SE “Aviakon” and Commercial Director of Westan Group Associates Ltd.	07.03.2019 investigation completed
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Crime scheme


In 2014, the Director of the SE “Aviakon”, his Deputy and the Chief Commercial Officer of the offshore company Westan Group Associates Ltd. organized two purchases by passing the required standards and procedures. Under the terms of the first purchase, Westan Group Associates Ltd. supplied the SE “Aviakon” 12 fuel tanks for Mi-24 helicopters for a total amount of 288 thous. USD, which had been purchased from a manufacturer located in Georgia at half price for 144 thous. USD. Then the SE “Aviakon” concluded one more contract with Westan Group Associates Ltd. for supply of 200 tanks that were also sold at a price twice as high as the one at which they were purchased from the Georgian manufacturer. However, the manufacturer was able to supply no more than 85 tanks, which Westan Group acquired for 1.02 mln USD and resold to Aviakon for 2.04 mln USD.

The investigation found that the contracts between the SE “Aviakon” and Westan Group Associates Ltd. for the supply of all fuel tanks were signed without prior analysis of the price market or receiving offers from other suppliers, and neither a tender committee nor authorized employees participated in the process.

Investigation in figures


 **28** months investigation lasted

 **40+** witness interrogation

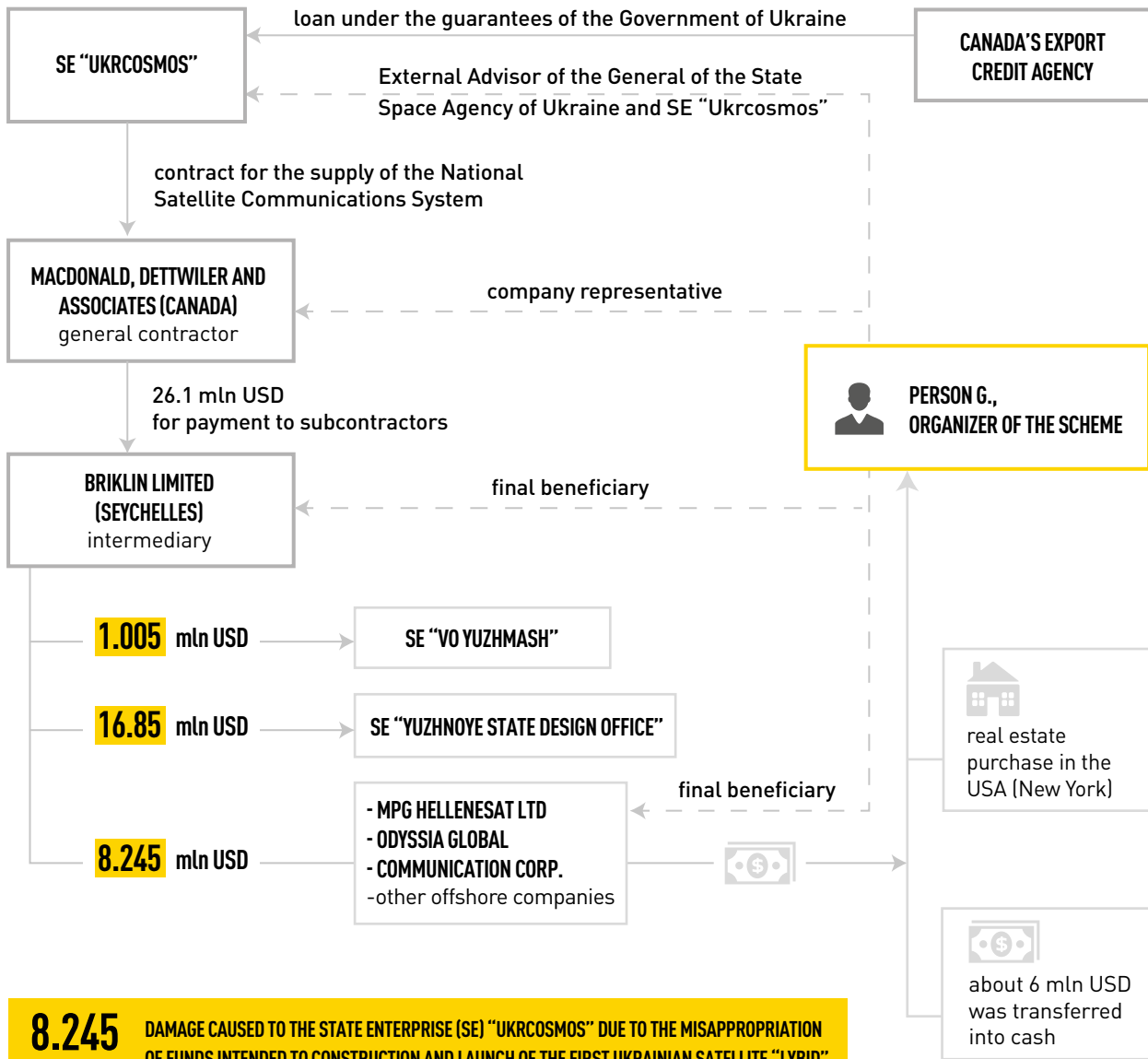
 **4** court examinations

 **50** volumes

 **10+** requests to 5 countries

 **60** investigative reviews of seized items and documents

COMPLETED INVESTIGATIONS



8.245 MLN USD **DAMAGE CAUSED TO THE STATE ENTERPRISE (SE) "UKRCOSMOS" DUE TO THE MISAPPROPRIATION OF FUNDS INTENDED TO CONSTRUCTION AND LAUNCH OF THE FIRST UKRAINIAN SATELLITE "LYBID"**

EMBEZZLEMENT AND LEGALIZATION OF THE FUNDS INTENDED FOR CONSTRUCTION OF THE NATIONAL SATELLITE COMMUNICATION SYSTEM OF UKRAINE

Suspects

- ex-Director of the SE “Ukrkosmos” suspected of committing a crime under P. 2 Art. 364 of the CC of Ukraine;
- External Advisor of the ex-Director General of the State Space Agency of — P. 3 Art. 27, P. 2 Art. 364, P. 5 Art. 191, P. 3 Art. 209 of the CC of Ukraine;
- close person to former External Advisor — P. 3 Art. 209 of the CC of Ukraine.

Key events

22.09.2016
investigation started

04.12.2018
notices of suspicion were given to the External Advisor of the ex-Director General of the State Space Agency of Ukraine and his confidant

30.01.2019
notice of suspicion was given to the former Director of the SE

13.02.2019
investigation completed

Crime scheme

According to the investigation, in 2011-2015, suspects organized a scheme to transfer abroad and launder 8.245 mln USD out of 292.4 mln USD. These were funds allocated by the Canadian Export Agency under the guarantee of Ukrainian government to be used by SE “Ukrkosmos” to develop and launch the first Ukrainian geostationary telecommunications satellite. To commit the crime, a former non-staff advisor to the Director General of the National Space Agency of Ukraine arranged for the abuse of office by the former Director General of “Ukrkosmos” in the interests of an offshore company he owns. The chief executive of the state enterprise signed and handed draft documents over to a general contractor, demanding a transfer of 26 mln USD to the offshore company. Of these, the non-staff advisor and his trusted associates subsequently appropriated 8.245 mln USD. These actions disrupted the launch of the Lybid satellite that would have become a component of the National Satellite Communication System of Ukraine.

Investigation in figures

5
requests to other countries

27
temporary access to things and documents

28
investigative reviews

110
volumes

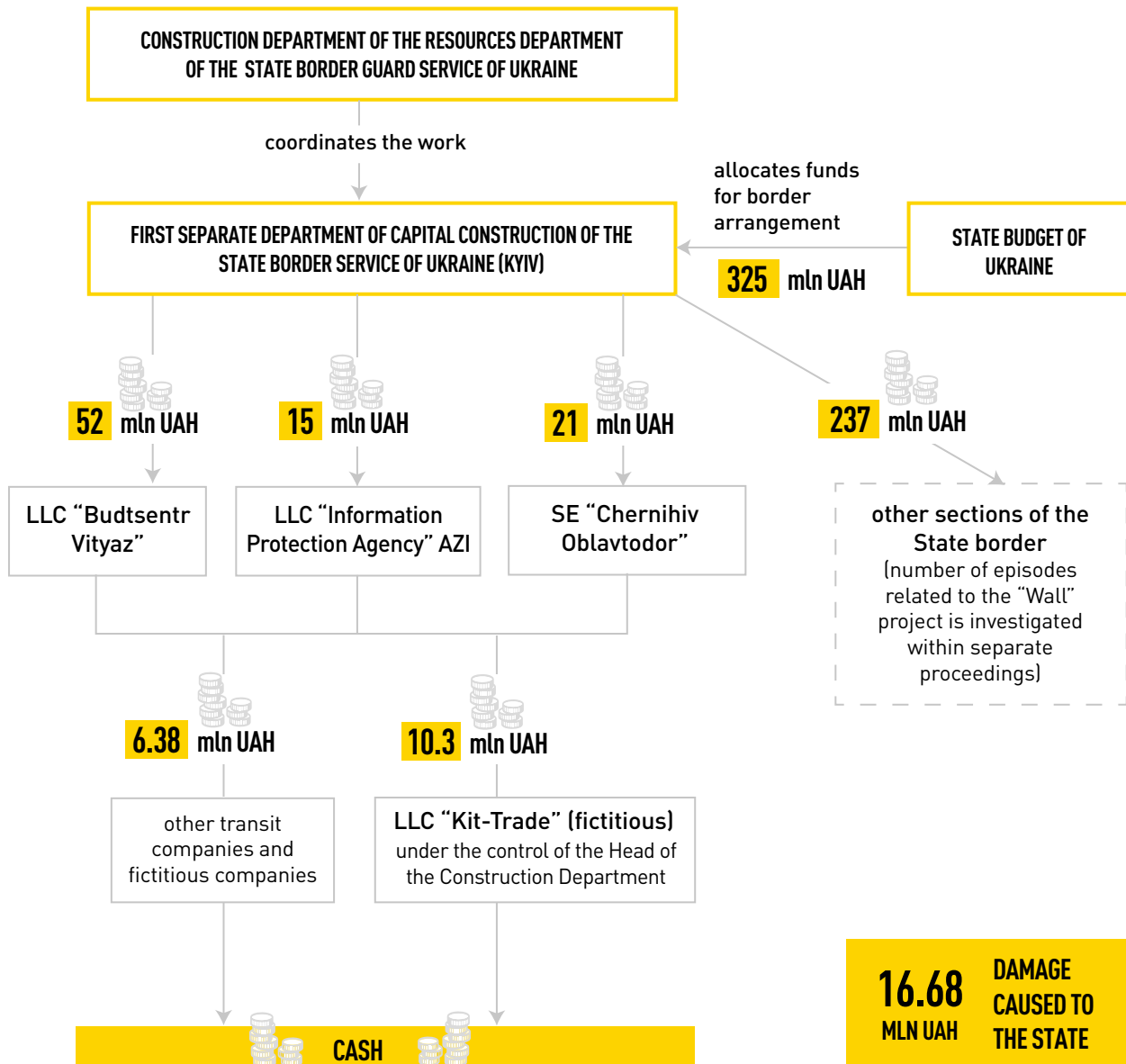
20
months investigation lasted

3
notices of suspicion

3
court examinations

59
witness interrogation

COMPLETED INVESTIGATIONS



EMBEZZLEMENT OF FUNDS ALLOCATED FOR THE ENGINEERING AND SET UP OF THE UKRAINIAN-RUSSIAN STATE BORDER (ALSO KNOWN AS UKRAINIAN WALL PROJECT)

Suspects

- Head of the Construction Department of the Administration of the State Border Service of Ukraine (P. 5 Art. 191, P. 3 Art. 27, P. 2 Art. 210 of the CC of Ukraine)
- ex-Head of the First Separate Department of Capital Construction of the SBS of Ukraine (P. 5 of Art. 191, P. 1 Art. 366, P. 2 Art. 210 of the CC of Ukraine)
- Senior Officer of the First Separate Department of the Capital Construction of the SBS of Ukraine (P. 5 Art. 191, P. 1 Art. 366 of the CC of Ukraine)
- Director of the LLC "AZI" (P. 5 Art. 191, Part 1 Art. 366 of the CC of Ukraine)
- former Director of the State Enterprise "Chernihiv Oblavtodor" of the SJSC "Ukrainian Highways" (P. 5 Art. 191, P. 1 Art. 366 of the CC of Ukraine)
- Head and founder of the LLC "Budtsentr Vityaz" (P. 5 Art. 191, P. 1 Art. 366 of the CC of Ukraine)
- two accomplices (P. 5 Art. 27, P. 5 Art. 191, P. 3 Art. 27, P. 2 Art. 205 of the CC of Ukraine)

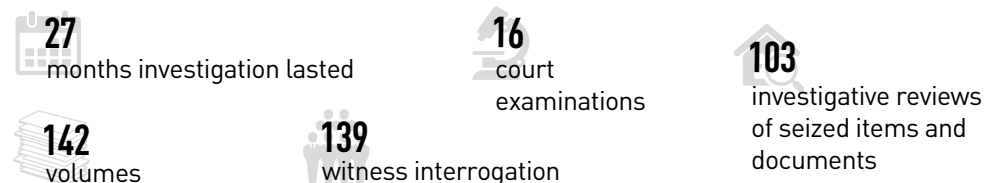
Key events

29.03.2016	09.08.2017	16.11.2017	04.07.2018	12.06.2019
investigation started	notices of suspicion were given to seven persons	notice of suspicion was given to eighth suspect	investigation completed	sent to court

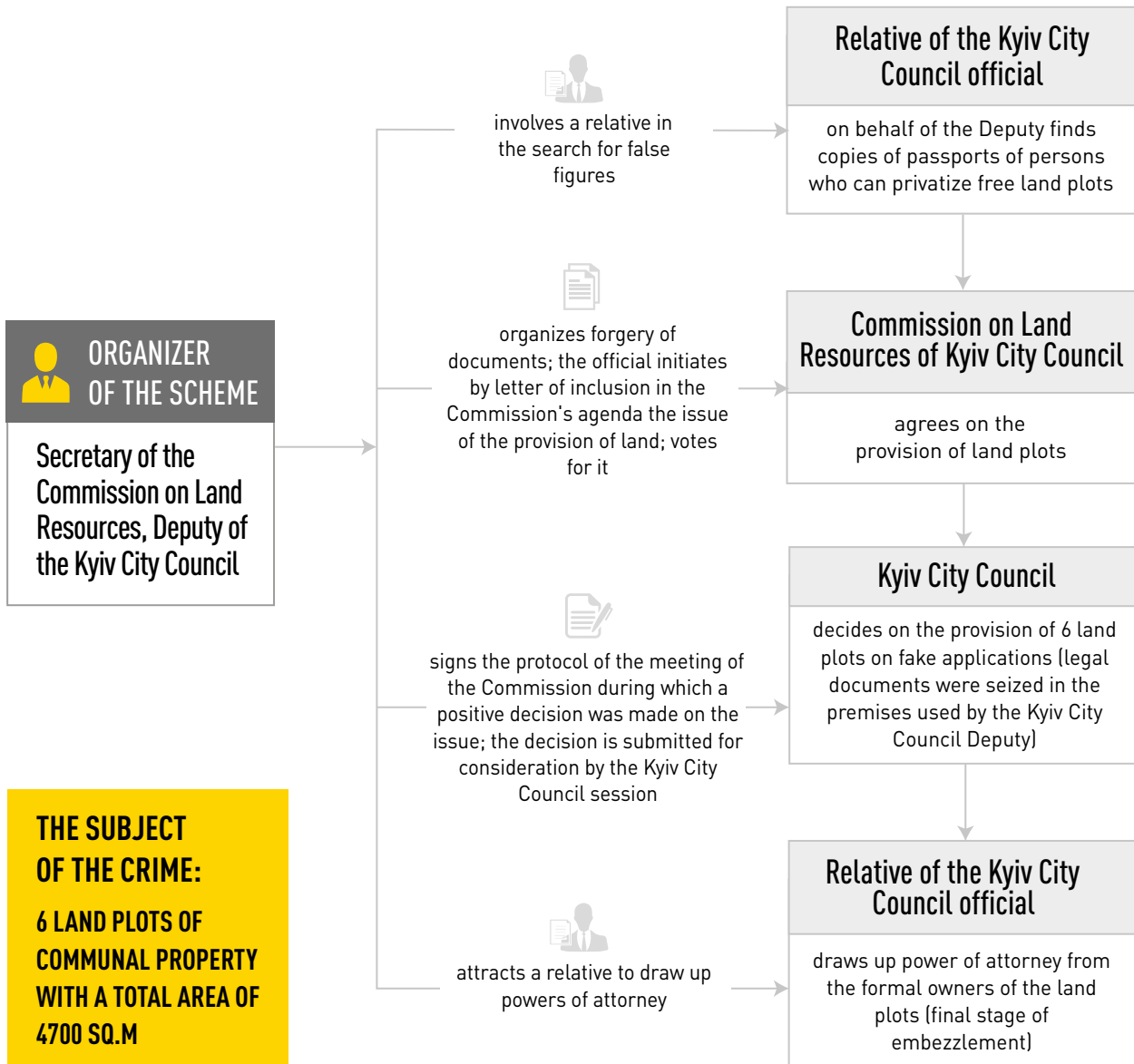
Crime scheme

The investigation found that the funds allocated for the engineering and technical outfitting of the state border between Ukraine and Russia were redistributed to a single unit of the State Border Guard Service in Kyiv instead of the nine military units directly at the border that should have received them. Contractors for the construction of the so-called Wall were selected arbitrarily, by passing the public procurement procedure. After signing work completion certificates containing demonstrably false data on the work performed and materials used, the contractors received funds from the state budget. Subsequently, the funds were transferred to a number of fictitious companies, converted into cash through a chain of transactions, and distributed among the accomplices.

Investigation in figures



COMPLETED INVESTIGATIONS



MISAPPROPRIATION OF 6 LAND PLOTS IN KYIV IN AMOUNT OF MORE THAN 2.3 MLN UAH

Suspects

- Deputy of the Kyiv City Council, Secretary of the Commission on Land Resources (P. 5 Art. 191, P. 3 and P. 4 Art. 358 of the CC of Ukraine)
- relative of the Kyiv City Council official (P. 5 Art. 27, P. 5 Art. 191 of the CC of Ukraine)

Key events

26.07.2017	25.02.2019	01.04.2019	03.06.2019
investigation started	notices of suspicion were given to the Deputy of the Kyiv City Council and his accomplice	investigation completed	sent to court

Crime scheme

The investigation revealed that a Deputy of the Kyiv City Council, the Secretary of the Commission on Land Resources organized a scheme to seize six land plots in 2008-2014. The official involved a relative in the scheme, who found individuals to whom the communally owned land plots could be registered. Subsequently, the official took steps to add the matter of land allocation to the commission's agenda. Later, the initiator and other deputies voted for the "required" decision at a session of the Kyiv City Council. As a result, six land plots with an area of 0.47 ha that cost over 2.3 mln UAH were allocated to pre-appointed persons who were completely unaware of it. The documents were forged.

The suspects implemented the scheme again to misappropriate three land plots with a total area of 0.26 ha. The case is being heard in a court. Moreover, sufficient evidence has been collected to prove that the Deputy of the Kyiv City Council acquired assets totaling 19.5 mln UAH, the legality of grounds for obtaining of which is not confirmed. However, the Constitutional Court of Ukraine declared the Article "Illegal enrichment" as an unconstitutional, and the case under Article 368-2 of the CC of Ukraine was terminated.

Investigation in figures

27
volumes

2.386
mln UAH damage

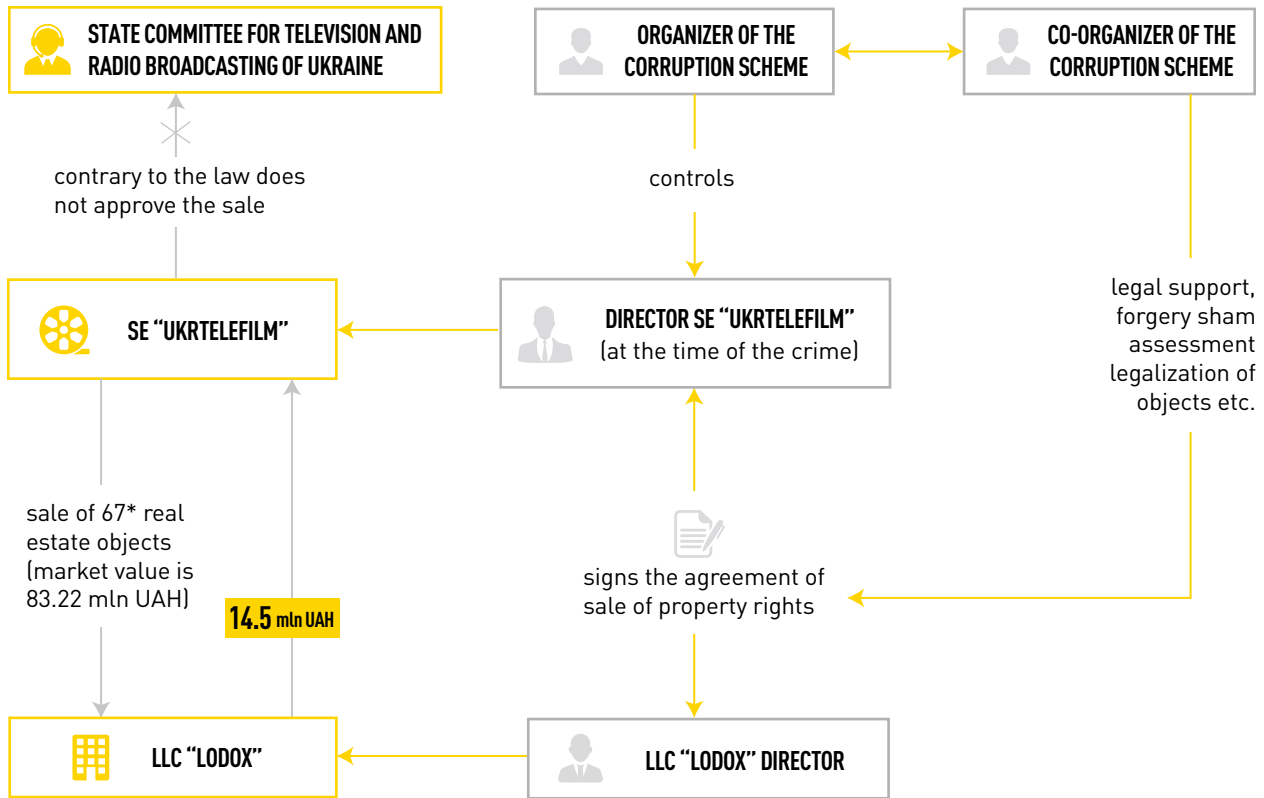
2
court examinations

11
witness
interrogation

20
months investigation
lasted

48
investigative reviews of seized
items and documents

COMPLETED INVESTIGATIONS



*67 real estate objects in Kyiv:
 24 apartments (2 704.2 sq.m)
 7 non-residential premises (680.5 sq.m)
 36 parking places (504 sq.m)

68.72 DAMAGE CAUSED TO SE "UKRTELEFILM" AS A RESULT OF ILLEGAL
 MLH UAH ALIENATED PROPERTY RIGHTS FOR REAL ESTATE OBJECTS

CAUSING 68.72 MLN UAH DAMAGE TO THE STATE ENTERPRISE “UKRTELEFILM”

Suspects

- organizer of the scheme (P. 3 Art. 27, P. 2 Art. 364, P. 3 Art. 209 of the CC of Ukraine) — put on international wanted list
- co-organizer of the corruption scheme (P. 3 Art. 27, P. 2 Art. 364, Pts. 1, 4 Art. 358, P. 3 Art. 209 of the CC of Ukraine)
- ex-Director of the SE “Ukrtefilm” (P. 2 Art. 364, P. 4 Art. 358 of the CC of Ukraine)
- Head of the LLC (P. 5 Art. 27, P. 2 Art. 364, P. 4 Art. 358, P. 3 Art. 209 of the CC of Ukraine)

Key events

12.02.2018 investigation started	07.11.2018 agreement between SE and LLC was declared invalid after the court decision	06.02.2019 notices of suspicion were given to three persons	16.04.2019 the fourth suspect has been put on the international wanted list	26.04.2019 investigation as of three persons completed
--	---	---	---	--

Crime scheme

According to the investigation, the Director General of SE Ukrainian Television Film Studio Ukrtefilm signed agreements to transfer 67 real property items (which is approximately 80% of all the assets the state enterprise owns) to a private company for 14.5 mln UAH, acting on the instructions from the organizer of the corrupt scheme. The market value of these items was 83.22 mln UAH. In fact, the payments under the contract were not made at all. In addition, the sale was carried out with numerous violations of the state property alienation procedure, even without the approval of the governing body, the State Committee for Television and Radio-broadcasting of Ukraine. Subsequently, the participants in the scheme took steps to legitimize and sell the property. According to forensic examination results, 68.72 mln UAH is amount of damage caused to the state.

Investigation in figures

12+
months investigation lasted

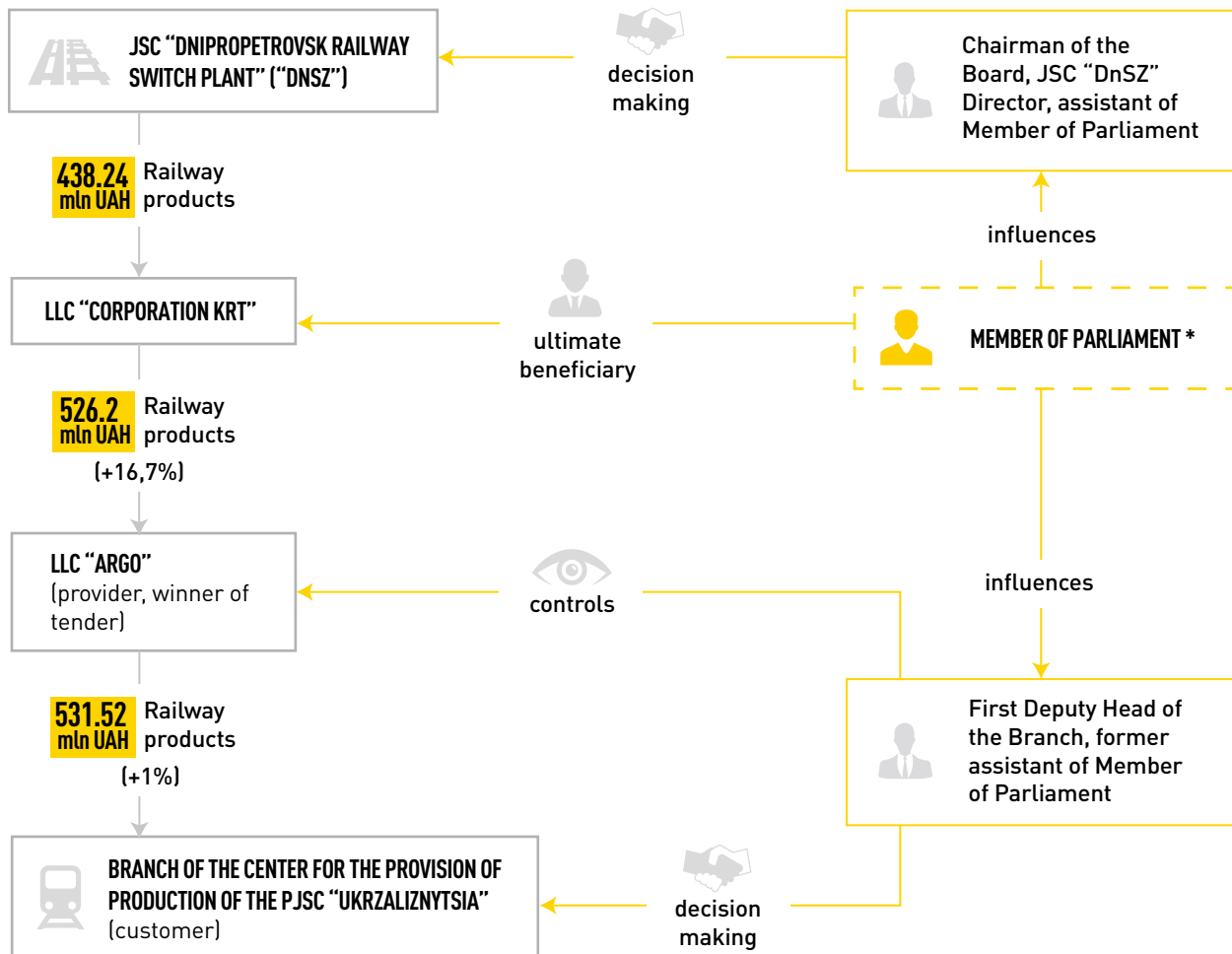
20
investigative reviews of seized items and documents

10+
court examinations

40+
witness interrogation

33
volumes

COMPLETED INVESTIGATIONS



93.28
mln UAH

DAMAGE CAUSED TO THE BRANCH OF THE CENTER FOR THE PROVISION OF PRODUCTION OF THE PJSC "UKRZALIZNYTSIA" AS A RESULT OF PROCUREMENT IN 2016-2017 TURNOUTS PRODUCTS AT INFLATED PRICES RESULTING FROM ARTIFICIAL COMPETITION

*the investigation of the episode involving the Member of Parliament continues as a separate criminal proceeding

CAUSING DAMAGE TO THE BRANCH OF THE CENTER FOR THE PROVISION OF PRODUCTION OF THE PJSC “UKRZALIZNYTSIA” DURING PROCUREMENT OF RAILWAY PRODUCTS

Suspects

- Head of the Board – General Director of the manufacturer of turnouts, assistant of Member of Parliament (P. 5 Art. 27, P. 5 Art. 191 of the CC of Ukraine)
- First Deputy Director of the manufacturer of turnouts (P. 5 Art. 27, P. 5 Art. 191 of the CC of Ukraine)
- founder – Director of the fictitious company – the winner of tender (P. 2 Art. 27, P. 5 Art. 191, P. 2 Art. 27, P. 2 Art. 28, P. 1 Art. 205, P. 1 Art. 366 of the CC of Ukraine)
- Director of the intermediary company (P. 2 Art. 27, P. 5 Art. 191 of the CC of Ukraine)
- three employees of the Branch of the Center for the Provision of Production of the PJSC “Ukrzaliznytsia” (P. 2 Art. 27, P. 3 Art. 358 and P. 5 Art. 27, P. 5 Art. 191 of the CC of Ukraine)
- former First Deputy Head of the Branch of the Center for the Provision of Production of the PJSC “Ukrzaliznytsia”, former MP’s assistant (P. 3 Art. 27, P. 2 Art. 28, P. 1 Art. 205, Pts. 2, 3 Art. 27, P. 5 Art. 191 of the CC of Ukraine)

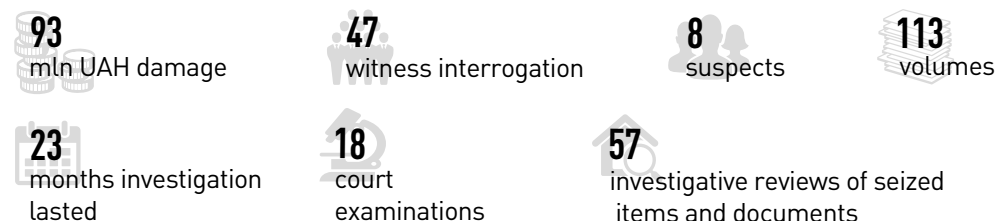
Key events

28.09.2016	15.01.2019	21.02.2019	03.05.2019
investigation started	notices of suspicion were given to seven persons	detention of eight suspect—ex-First Deputy Head of the Branch of the Center for the Provision of Production of the “Ukrzaliznytsia”	investigation completed

Crime scheme

Suspects organized the purchase of turnouts equipment for the needs of “Ukrzaliznytsia” at inflated prices. The intermediary companies were involved in the purchase. A company affiliated with the suspects created the semblance of competition during the open tender. The tender was won by the company that resold the products to “Ukrzaliznytsia” at a price 21% higher than the price offered by the manufacturer. The abovementioned company did not participate in the tender but actually supplied “Ukrzaliznytsia” with turnouts equipment directly. As a result of these actions, “Ukrzaliznytsia” suffered 93.2 mln UAH losses.

Investigation in figures



REFUNDED FUNDS

Over 560 mln UAH damage was refunded under the cases of the NABU and the SAPO, 70% of which are at the pre-trial stage; most of the cases pertain to the fuel and energy sector

Damage caused by the corruption crimes investigated by the NABU are estimated to exceed 200 bln UAH. Of these, more than 30 bln UAH fall under the fuel and energy sector and 1 bln UAH falling under the defence industry.

The Detectives take all measures to ensure these losses are refunded. First, this will be achieved by gathering sufficient evidence to support guilty verdicts in the investigations by the NABU and the SAPO, which would give occasion for the confiscation of property and assets of those convicted of corruption.

Thus, in more than 200 cases where pre-trial investigation had been completed, damage were established in the amount of 8.28 bln UAH. In addition, 23 land plots, more than 50 real estate properties, and nearly 40 vehicles were seized. If the suspects are convicted by court, all these assets may become state property.

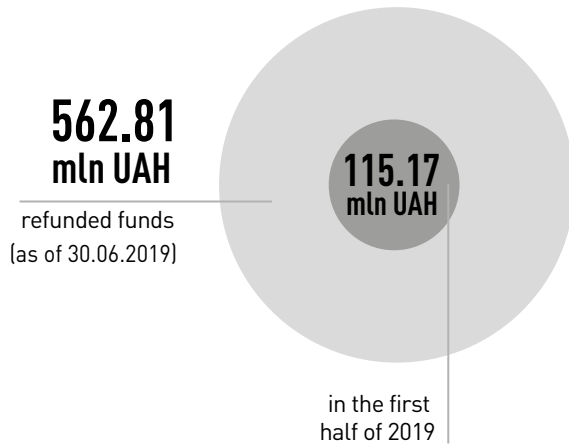
To create a basis for further reclamation of funds, the NABU actively used lawsuits. That tool made it possible the PJSC "Zaporizhiaoblenerho" to pay 107.64 mln UAH for the electricity supplied. Unfortunately, in the spring of this year, the Constitutional Court of Ukraine deprived the National Anti-Corruption Bureau of Ukraine of the right to file claims to cancel illegal transactions.

168.59

THOUS. UAH

of an improper advantage were returned by the Member of the Parliament to the state during the NABU investigation

REFUNDED FUNDS

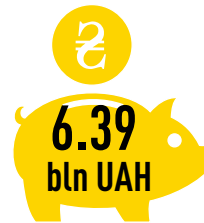
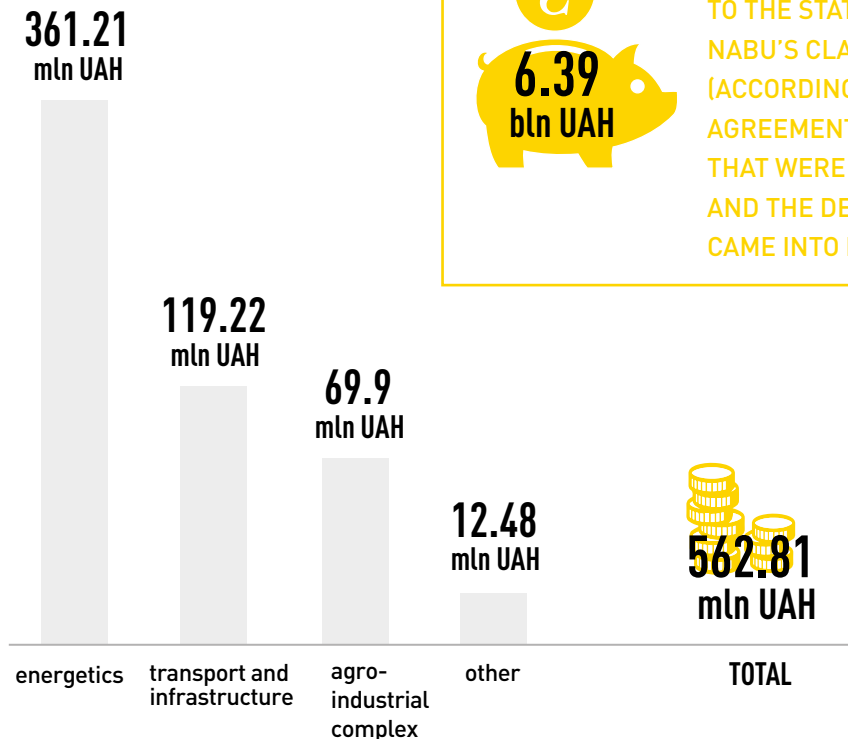


refunded funds in the first half of 2019
in criminal proceedings in which
pre-trial investigation is in progress



refunded funds in
completed criminal
proceedings

**REFUNDED FUNDS:
INDUSTRY CUT-OFF**
(as of 30.06.2019)



THE AMOUNT OF FUNDS
THAT CAN BE REFUNDED
TO THE STATE DUE TO THE
NABU'S CLAIMS WORK
(ACCORDING TO THE
AGREEMENTS/CONTRACTS
THAT WERE INVALIDATED
AND THE DECISIONS
CAME INTO FORCE)

INTERNATIONAL ASPECT OF INVESTIGATIONS

Transferring funds abroad and their subsequent legalization remain integral parts of the corrupt schemes investigated by the Detectives of the National Bureau

40

COUNTRIES

received requests for international legal assistance from the NABU on pre-trial investigations in the first half of 2019

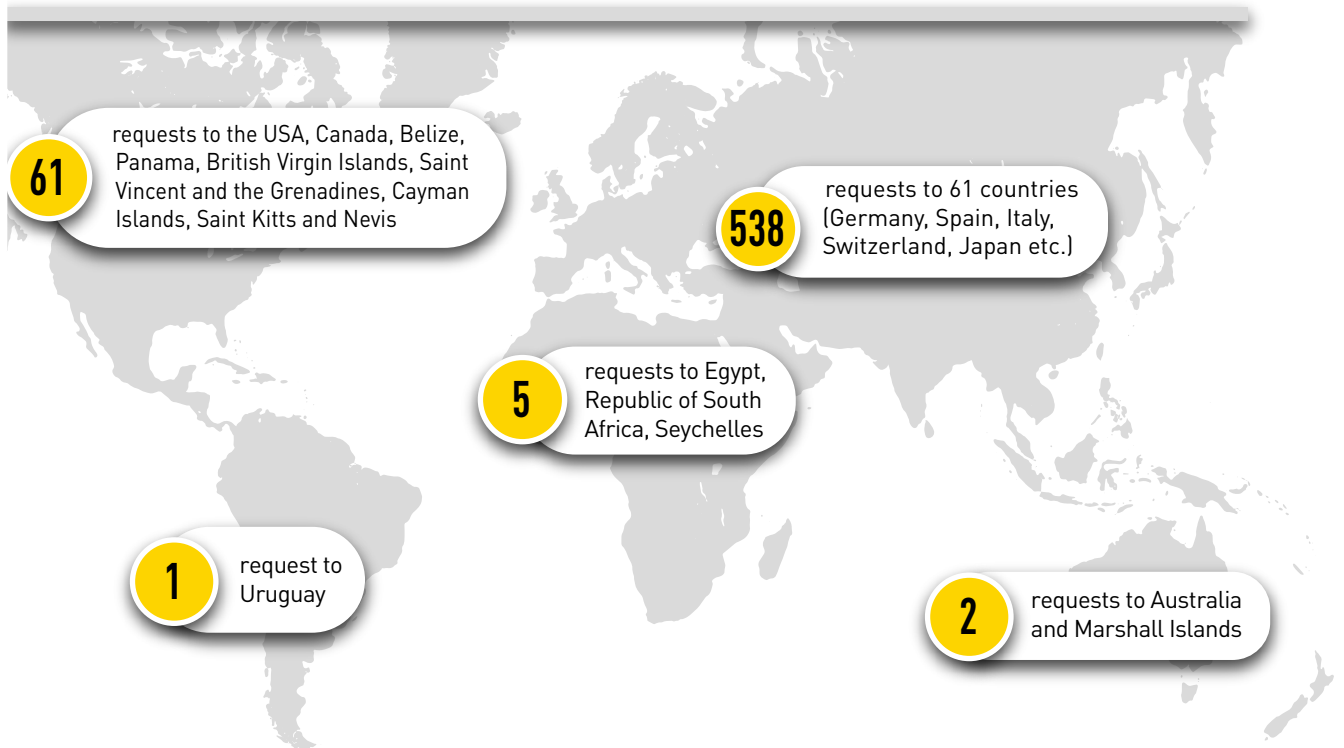
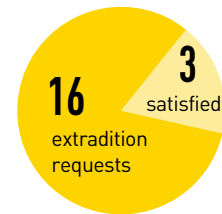
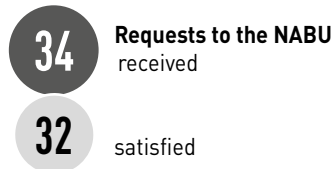
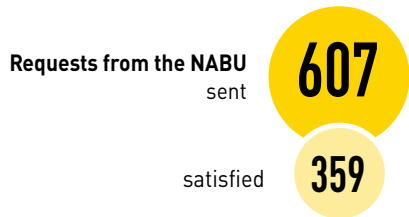
Using entities registered in foreign jurisdictions is a popular practice in corrupt schemes arranged by the persons who are under investigation by the National Bureau. Such companies are mostly used as tools to withdraw funds outside of Ukraine and subsequently legalize it. Incidentally, the NABU Detectives show that this trend remains relevant, as most of the transactions in the schemes arranged after 2014 and uncovered by the National Anti-Corruption Bureau of Ukraine Detectives are lost far abroad. The NABU must not only reconstruct the entire chain of money transfers to offshore jurisdictions but also find evidence of connections between Ukrainian officials and relevant foreign companies.

The geography of Ukrainian corruption is expanding and now covers at least 69 jurisdictions. Overall, of the National Anti-Corruption Bureau of Ukraine sent 607 requests for international legal assistance to these jurisdictions, 114 of them in the first half of 2019.

The data obtained in the framework of cooperation with law enforcement authorities of other states helped to solve a number of high-profile cases, the investigation of which of the National Anti-Corruption Bureau of Ukraine Detectives completed in the first half of 2019. These include criminal proceedings concerning the damage caused to the SE "Aviakon" and the SE "Ukrkosmos".

INTERNATIONAL LEGAL COOPERATION: REQUESTS FOR LEGAL ASSISTANCE

[as of 30.06.2019]



* Azerbaijan, Bangladesh, Hong Kong, Georgia, Israel, Kazakhstan, Kyrgyzstan, People's Republic of China, the United Arab Emirates, Austria, Belgium, Belarus, Bulgaria, the United Kingdom, Greece, Estonia, Cyprus, Latvia, Lithuania, Luxembourg, Liechtenstein, Moldova, Macedonia, Monaco, Netherlands, Norway, Jersey, South Korea, Poland, Russia, Romania, Saudi Arabia, Singapore, Slovakia, Tajikistan, Turkey, Uzbekistan, Hungary, Finland, France, Croatia, Czech Republic, Montenegro, Switzerland, Sweden, Denmark, India, Republic of Ireland, the Maldives, Man

LEGISLATIVE WORK

In the first half of 2019, the NABU found corruption risks in the field of public procurement and worked on draft amendments to the anti-corruption legislation

The relevant law gives the National Bureau the right to send proposals and recommendations to the state and local authorities to eliminate the causes and conditions conducive to criminal offences under the NABU's jurisdiction (Art. 11, para. 9). These proposals and recommendations are required to be reviewed within 30 days. To fulfil this requirement, the NABU Detectives made four such submissions in the first half of 2019, three of which yet have not been responded to (as of late June, 2019). The issues that drew the attention of the Detectives cover, among other things, migration policy and public procurement in the defence industry and the fuel and energy sector.

The defence industry was also in the focus of the NABU Legal Department. It has joined in the development of two draft legal acts regulating certain aspects of procurement in this area.

Particular attention is paid to the development of proposals to improve the Criminal Code of Ukraine and the Criminal Procedure Code of Ukraine. In the first half of 2019, 19 draft laws were analysed with recommendations offered for the same amount, which is a record for the NABU. These included legislative initiatives to improve the procedure for special pre-trial investigation, confiscation of illegal assets of officials, and punishment for the acquisition of such assets.

18

BILLS

submitted by the
Verkhovna Rada to the
NABU for processing in
the first half of 2019

LEGISLATIVE WORK

(from 01.01.2019 till 30.06.2019)

NABU LAWYERS ANALYZED AND GAVE CONCLUSIONS IN REGARD TO



Draft of laws



Draft of subordinate acts



Authors of applications

- 18 Verkhovna Rada of Ukraine
- 3 Ministry of Economic Development and Trade of Ukraine
- 1 Ministry of Justice of Ukraine
- 1 Ministry of Internal Affairs of Ukraine
- 1 State Service of Export Control of Ukraine
- 1 National Agency of Ukraine for finding, tracing and management of assets derived from corruption and other crimes

5



DECISIONS ON GRANTING CITIZENSHIP OF UKRAINE WERE CANCELED BY STATE MIGRATION SERVICE OF UKRAINE ON THE BASIS OF MATERIALS RECEIVED FROM THE NABU WITHIN INVESTIGATION OF CORRUPTION IN THE MIGRATION SPHERE

state property management

1

interference in the automated document management system of a court

1

some aspects of public procurement in the defense industry

1

migration policy

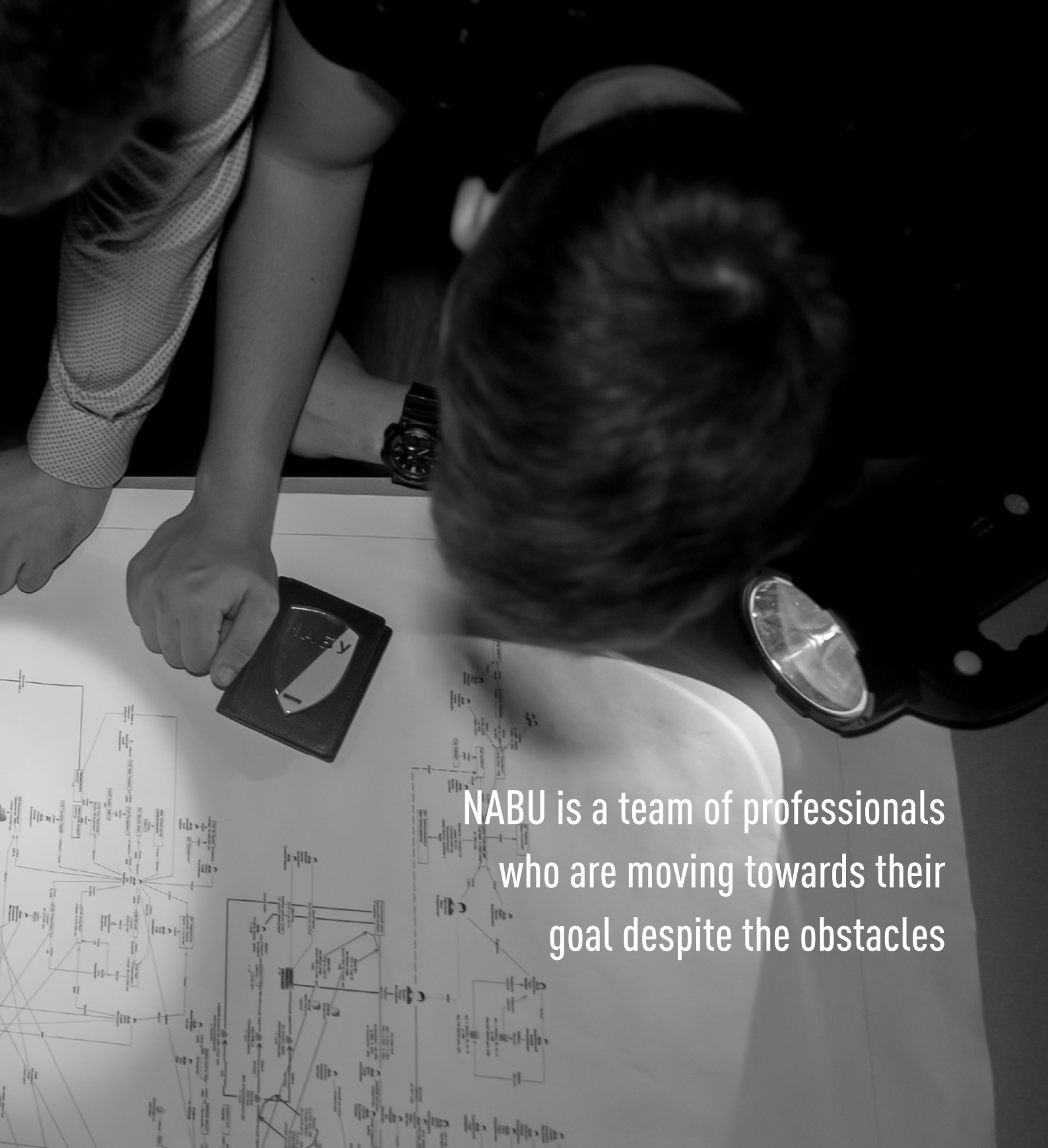
1



Directed submissions to eliminate the causes and conditions that contributed to the commission of a criminal offense



INSTITUTION



NABU is a team of professionals
who are moving towards their
goal despite the obstacles

KEY EVENTS

JANUARY

The National Bureau signed a cooperation agreement with the Police and Border Guard Board of Estonia. Initiated by the World Bank in Ukraine, a discussion “Combating Corruption: What’s Next?” was held in Lviv to establish cooperation between law enforcement officers and the public. Ivan Franko National University of Lviv was ranked ninth on the list of academic institutions which students can undertake an internship at the National Bureau. Results achieved and challenges faced by the NABU, the ARMA and the SAPO were discussed at a conference in Kharkiv held with the support of the European Union Anti-Corruption Initiative in Ukraine.

01

02

First Deputy Director of the National Bureau informed on the institution’s performance at the Sixth Annual Conference of the Estonian Centre for Eastern Partnership in Tallinn. With the support of the U.S. Embassy in Ukraine, 12 Detectives of the National Bureau were trained in money laundering investigation and asset recovery. Interns of German Corporation for International Cooperation (GIZ) visited the NABU and learned about the circumstances of its creation, its primary mission and objective. The NABU Civil Oversight Council and Transparency International Ukraine organised a public discussion of the way authority is divided among the newly created anti-corruption institutions and how pre-trial investigations before and after entry into force “Lozovyi’s amendments” are regulated in terms of legislation.

FEBRUARY

MARCH

With the financial assistance of the Bureau of International Narcotics and Law Enforcement Affairs of the U.S. State Department, the NABU employees were trained in effective use of digital evidence within investigations. Thanks to Transparency International Ukraine, 35 students of the “Corruption — Incentives, Disclosure and Liability programme” of the Norwegian School of Economics were informed on the activities of the National Anti-Corruption Bureau of Ukraine.

03



MAY

The 4th round of admission to the NABU ended with 34 persons winning the open competition to become Detectives. The NABU had an opportunity to cooperate and communicate with foreign anti-corruption organisations directly, without any interference from the PGO. The state of combating top-corruption in Ukraine was discussed at an executive meeting of the NABU and the mission from the IMF. The NABU representatives took part in the 10th session of the Implementation Review Group of the UN Convention against Corruption in Vienna. The World Bank in Ukraine initiated a second public discussion "Combating Corruption: What's Next?". The event in Kharkiv was aimed at improving the dialogue between the NABU and the public. Moreover, 28,688 citizens participated in the online voting for the candidates to the 5th convocation of the Civil Oversight Council.



04

05

National Bureau became the first law enforcement agency in Ukraine and one of the first in Europe to prove that its anti-corruption management system meets the requirements of the international standard of ISO 37001:2016. Detectives and Analysts of the NABU took part in the Crypto Currency and Money Laundering training conducted by experts from the International Centre for Asset Recovery (ICAR). To mark the 4th anniversary of the founding the National Bureau the Youth Day was held, students met Detectives and Executives of the NABU, visited criminal laboratory and played in "anti-corruption mafia".

APRIL

06

The NABU Director met the participants of Derzhavotvoret's programme (a personal and professional growth programme for young people) and informed on the organisation's results at the international conference on building effective, accountable and inclusive institutions in Ankara. 10 NABU Analysts completed a training course on crime analysis and application of the specialised software IBM i2 Analyst's Notebook at the Police Graduate School (Poland). The NABU and the FBI's International Corruption Unit have signed a Memorandum of Understanding.

JUNE

TEAM

In 2019, the fourth round of the Detectives selection was successfully completed. They have already joined the investigation teams

In 2019, the staffing of NABU's main structural unit, the Main Detectives Unit, was completed. The fourth round of the competitive selection lasted for about a year. More than 1,500 candidates applied for positions of the National Anti-Corruption Bureau of Ukraine. Consequently, as of June 30, 2019, only nine detective positions in the Main Detectives Unit remain vacant, five more detectives are to be appointed soon.

The officials who have been working at the National Anti-Corruption Bureau of Ukraine 2015–2016 continued to enhance their skills and knowledge in 2019. For instance, with the financial assistance of the Bureau of International Narcotics and Law Enforcement Affairs (INL) of the U.S. State Department, Analysts of the National Anti-Corruption Bureau of Ukraine trained to use digital evidence in the investigation of corruption crimes. The National Anti-Corruption Bureau of Ukraine employees took part in a training on criminal investigation organised with the support of the U.S. Embassy in Ukraine, while special operations officers underwent special tactical training. Overall, 73 employees of the National Bureau visited 18 countries for training and studying in the first half of 2019. The skills and international experience they acquired are extremely useful in the investigation of complex corruption schemes.

1 865

PEOPLE

have applied for the
NABU Detectives
competition

STAFF MEMBERS

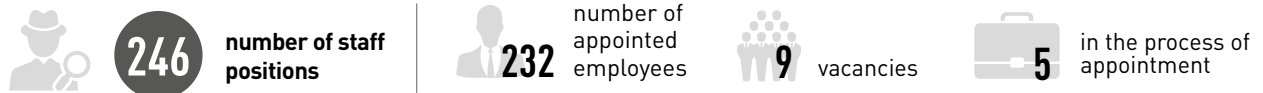
(as of 30.06.2019)

NABU'S STAFF



*including persons who have been appointed for the period of maternity leave of the main worker

THE MAIN DETECTIVES UNIT: NUMBER OF STAFF



FACTS ABOUT THE EMPLOYEES



98
are combat veterans

38 employees have academic degrees

26	Ph.D. in Law
7	Ph.D. in Economics
2	Ph.D. in Engineering Science
1	Political Science
1	Health
1	Physical Education and Sport

73 NABU employees visited 18 countries for study visits (from 01.01.2019 till 30.06.2019)

INTEGRITY

All processes in the NABU are monitored by the Internal Control Department (ICD). The ICD has developed and implemented a system of measures to prevent corruption based on the world's best practices

The National Bureau is the first law enforcement agency in Ukraine and one of the first in Europe which received a certificate confirming that its anti-corruption management system complies with the requirements of the international standard ISO 37001:2016. In preparation for certification, the NABU improved the procedure for assessing corruption risks, introduced additional monitoring, and control measures, while four ICD Detectives became certified specialists in the implementation of the standard.

PECB Group Inc. carried out certification audit at the initiative of the NABU management and with the support of the EU Anti-Corruption Initiative in Ukraine (EUACI). The activities of all NABU departments were subject to certification. The decision to issue the certificate was made at the Central Canadian Office of PECB Group Inc. in April 2019 based on the audit findings. As early as in May, a Detective of the ICD presented an improved the NABU anti-corruption system at an international event (Vienna, Austria).

In the first half of 2019, the ICD analysed 187 agreements between the NABU and various business entities for corruption risks, according to ISO 37001:2016. Based on 6 reports of potential conflicts of interests involving the NABU employees, measures have been taken to avoid a conflict in two cases, while four other cases have not been confirmed.

115

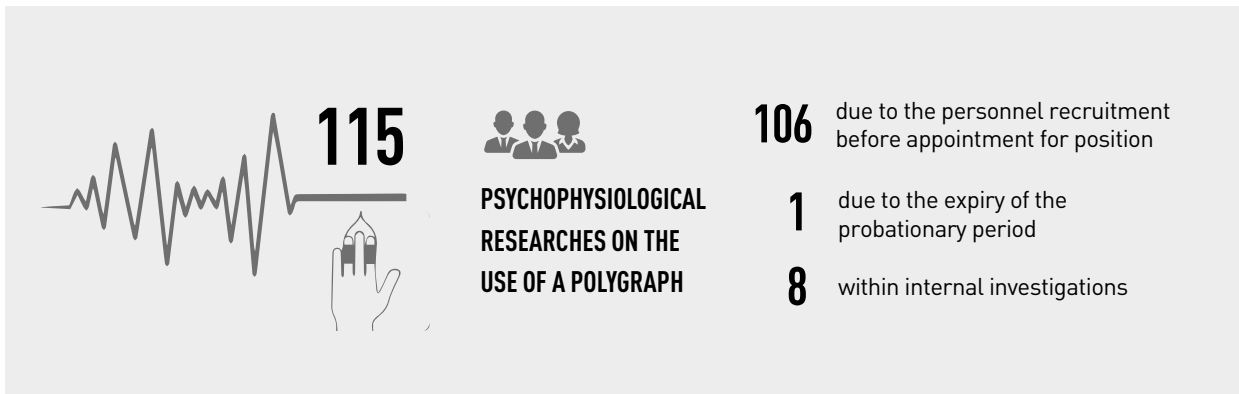
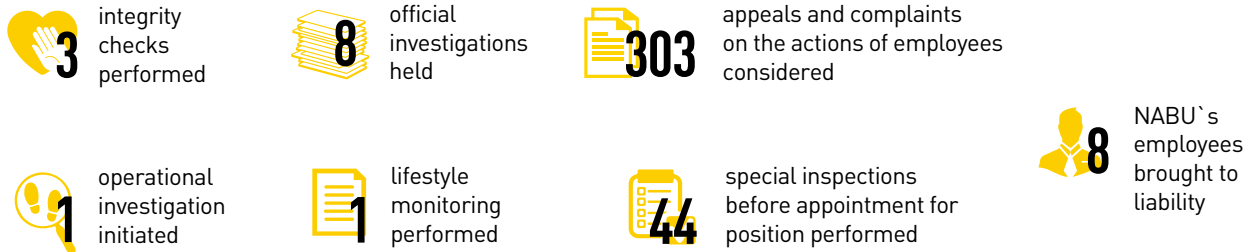
NABU EMPLOYEES

underwent
psychophysiological
studies using the
polygraph in the
first half of 2019

INTERNAL CONTROL IN FIGURES

(from 01.01.2019 till 30.06.2019)

INTERNAL INVESTIGATIONS



EXPLANATORY WORK



INTERNATIONAL COOPERATION

In the 21st century corruption has become a transnational phenomenon, which is why the fight against it is a matter of global security, not a task for a single country or law enforcement agency

In the first half of 2019, the National Bureau continued to expand the range of its international partners. On January 14, 2019, a Cooperation Agreement was signed with the Police and Border Guard Board of Estonia, and on June 25, 2019, a Memorandum of Understanding was signed with the International Corruption Unit of the U.S. Federal Bureau of Investigation.

The NABU representatives took part in the 15th session of the United Nations in Vienna and joined the group, which will analyse the state of implementation of the UN Convention Against Corruption in Croatia.

At the initiative of the World Bank in Ukraine, directors of Territorial Offices of the National Bureau in Lviv and Kharkiv established effective interaction with the public during open discussions “Combating Corruption: What’s Next?”.

Due to the support of the EU Anti-Corruption Initiative in Ukraine, the Cross-Border Cooperation to Combat Corruption in Customs Authorities seminar was held in Lviv. Representatives of the NABU and anti-corruption authorities of Poland, Moldova, Romania, Hungary and Slovakia attended the event.

Scientists and students from Germany, Armenia, and Norway, who visited the NABU during the reporting period, got acquainted with the Bureau’s activities.

36

MEETINGS

of the NABU executives with international partners were held in the first half of 2019

GEOGRAPHY OF VISITS

(from 01.01.2019 till 30.06.2019)

36

meetings with international partners

3

visits abroad to

3

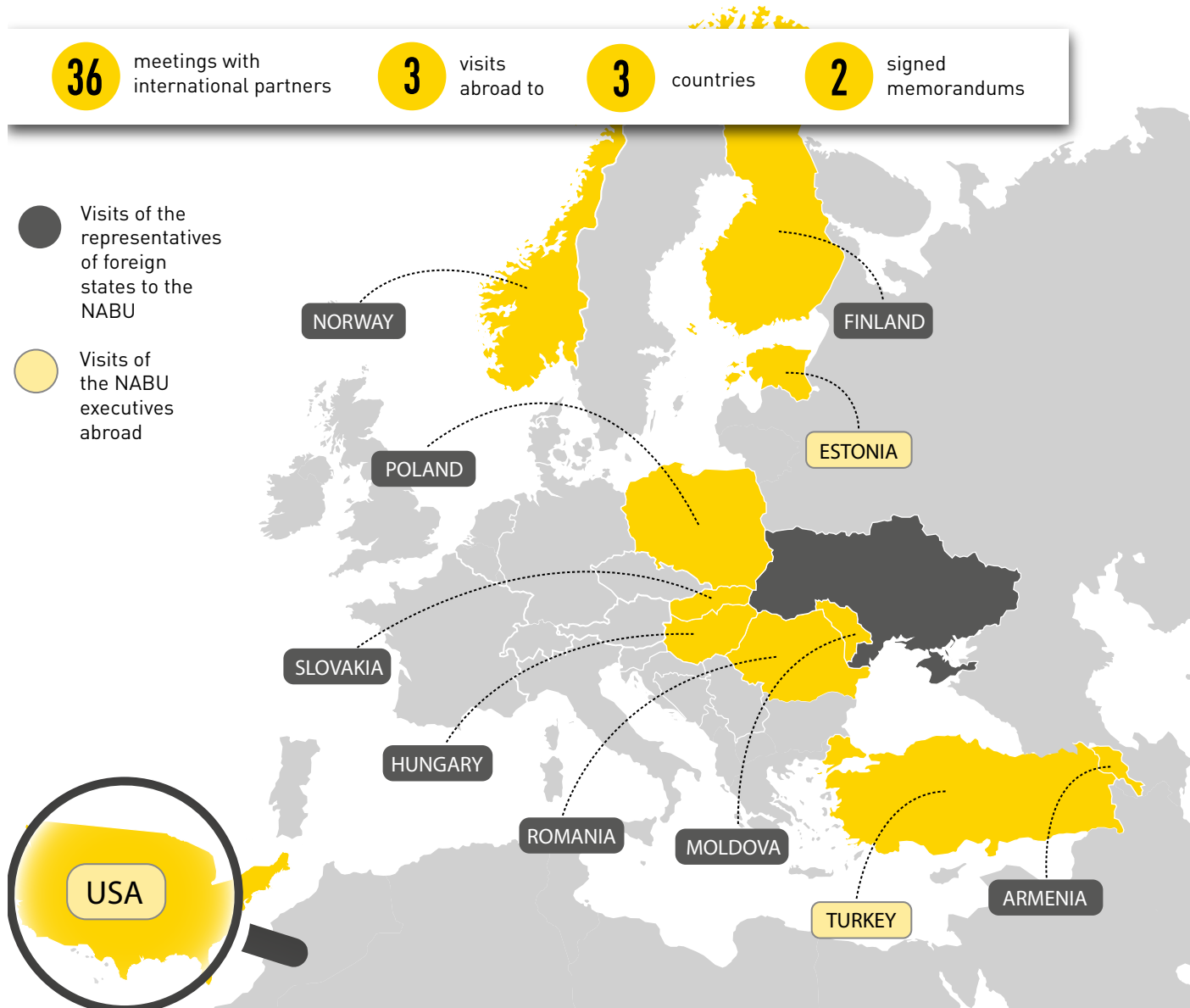
countries

2

signed memorandums

● Visits of the representatives of foreign states to the NABU

● Visits of the NABU executives abroad



COOPERATION WITH GOVERNMENT AUTHORITIES

Data obtained within investigations often become the basis for decision-making by other state bodies. Such decisions include imposing fines and banning entities from public procurements

In 2019, the NABU continued its cooperation with the Anti-Monopoly Committee of Ukraine (AMCU). As a result, it was possible to prevent the embezzlement of at least 260 mln UAH. Two companies participating in the procurement of construction services in the capital were fined and banned from tenders for three years.

This was made possible thanks to the data collected by the NABU within the pre-trial investigation as of allegedly abuses in the course of the repairs of the Shuliavskiyi Bridge in Kyiv. The Detectives exposed the collusion of two parties. Having received information from the National Bureau, the AMCU conducted its own investigation and found evidence of collusion between these companies in two more cases, the construction of Amosov National Institute of Cardiovascular Surgery and the renovation of Boichenko Secondary School No. 59 in Holsiivskiyi District of Kyiv.

Other state bodies often turn to the NABU following their own inspections. For instance, after analysing the efficiency with which state budget funds had been used in road maintenance, the Accounting Chamber found several cases of violations with signs of criminal offences. Having processed the information received, the NABU Detectives entered the data in the Unified Register of Pre-Trial Investigations and launched a number of pre-trial criminal investigations.

262

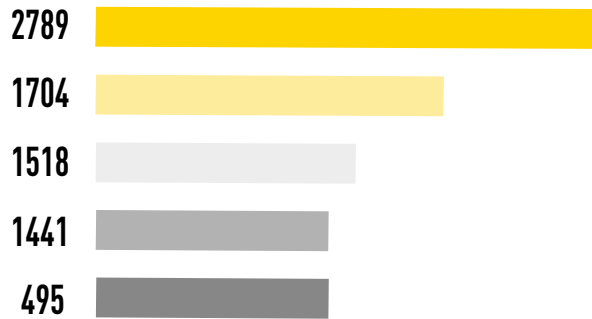
MLN UAH

fine imposed on two companies by the AMCU for plotting a construction tender in Kyiv, which was exposed by the NABU Detectives

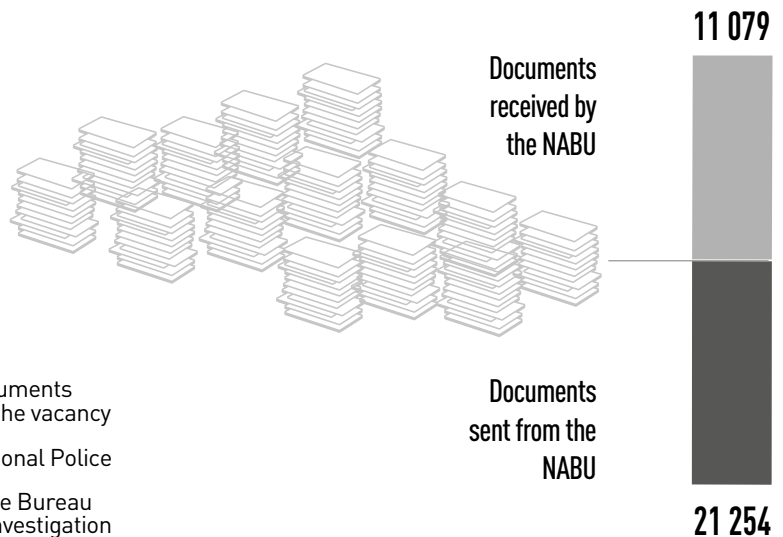
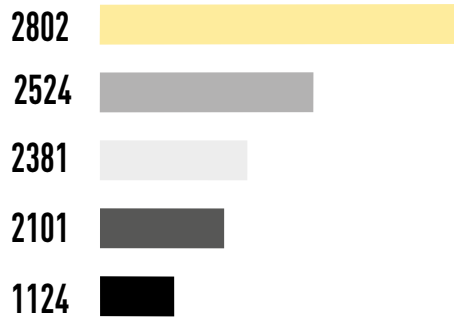
COOPERATION WITH GOVERNMENT AUTHORITIES

(from 01.01.2019 till 30.06.2019)

TOP 5 RECIPIENTS OF THE NABU IN TERMS OF INCOMING CORRESPONDENCE, DOCUMENTS



TOP 5 RECIPIENTS OF THE NABU IN TERMS OF OUTGOING CORRESPONDENCE, DOCUMENTS



- judicial authorities
- legal entities
- other central executive authorities
- Prosecutor's Offices

- documents for the vacancy
- National Police
- State Bureau of Investigation

PUBLIC RELATIONS

In the Ukrainian society, the demand for anti-corruption efforts remains high. This is confirmed by the increased number of complaints from citizens about allegedly corruption offences

External Communications Department (ECD), Public Submissions Department (PSD) and the three Territorial Offices (TO) are the structural units of the National Bureau that work to ensure efficient interaction with the public throughout Ukraine. Each of these units uses the resources and special tools available to it.

In the first half of 2019, ECD established the media presence for the National Bureau by organising briefings, press conferences, and interviews for Ukrainian and foreign media. New information on the National Bureau's activities was published on its official website nearly every day to demonstrate the institution's openness. Most of the published news concerned high-profile pre-trial investigations, which were also the main topics that interested the media.

In six months, the Public Submissions Department and the Territorial Offices processed 7,519 appeals of citizens, which is 17% more than in the previous reporting period. More than half of these were sent to the National Bureau via email, and about 3,000 persons reported possible corruption by telephone.

Educating citizens and interacting with the student community are separate areas of public relations. In six months, 20 higher education institutions participated in the NABU events.

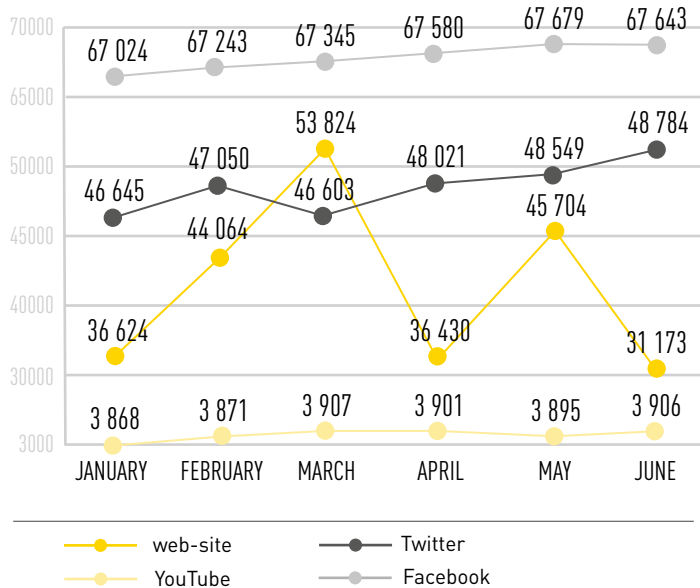
7 519
REQUESTS

from citizens were
received by the
NABU in the first
half of 2019

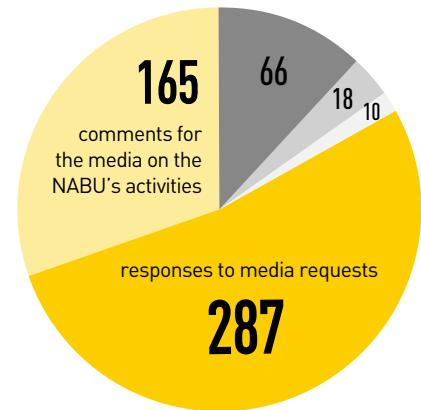
COOPERATION WITH PUBLIC AND MEDIA

(from 01.01.2019 till 30.06.2019)

DYNAMICS OF THE AUDIENCE OF THE NABU OFFICIAL WEB-SITE AND SOCIAL NETWORKS



MEDIA COMMUNICATIONS



briefings and press conferences 66
 TV interviews with the NABU executives 18
 interviews for internet media 10

PUBLICATIONS ON THE NABU WEB-SITE

- 73** pre-trial investigations
- 7** activity of the NABU Territorial Offices
- 8** international cooperation
- 23** vacancies
- 34** other

INTERNATIONAL MEDIA COMMUNICATIONS



REQUESTS RECEIVED BY THE NABU

- requests to the NABU **7519**
- applications, requests of legal entities **568**
- NGOs applications and requests **434**
- requests for access to public information **215**
- requests and applications of the Members of Parliament of Ukraine sent directly to the NABU **174**
- requests and applications of the Members of Parliament of Ukraine sent from other agencies **91**
- requests to the Public Office **39**

ACTIVITIES OF THE TERRITORIAL OFFICES

(from 01.01.2019 till 30.06.2019)

ACTIVITIES OF LVIV TERRITORIAL OFFICE IN FIGURES



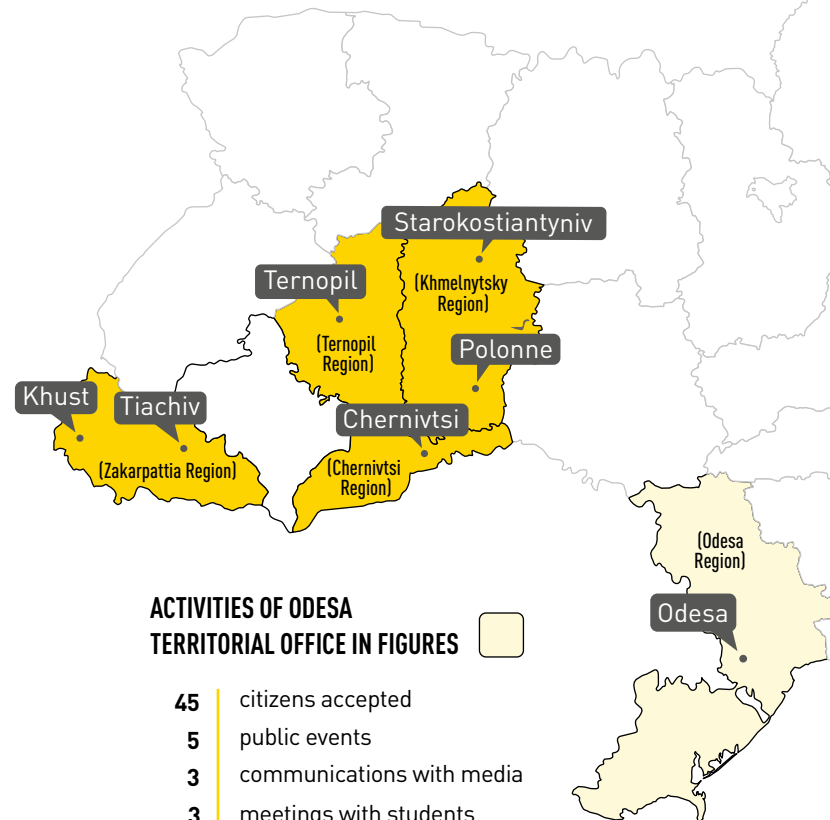
68	citizens accepted
29	public events
23	communications with media
9	meetings with students

WHOSE ACTIONS RESULTED IN COMPLAINTS RECEIVED BY LTO

55%	complaints which do not fall under the NABU jurisdiction
21%	other
17%	executive authorities
15%	local governments
14%	law-enforcement agencies
12%	courts
5%	state and municipal enterprises
2%	agencies of the State Fiscal Service of Ukraine
1%	Members of Parliament of Ukraine

TOP 5 ISSUES MENTIONED IN COMPLAINTS RECEIVED BY LVIV TERRITORIAL OFFICE

- corruption offenses in the judicial and law enforcement systems
- illegal actions of the local governments officials during the performance of their official duties
- procedural offenses during trial involving the applicants
- improper pre-trial investigation
- violation of the Law of Ukraine "On Prevention of Corruption"



ACTIVITIES OF ODESA TERRITORIAL OFFICE IN FIGURES

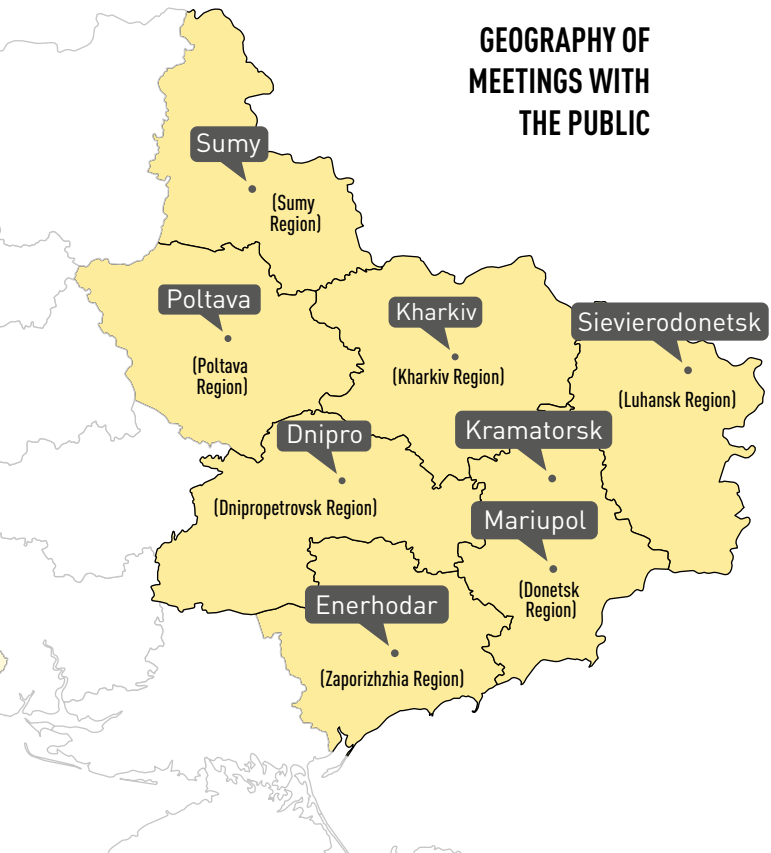


45	citizens accepted
5	public events
3	communications with media
3	meetings with students

WHOSE ACTIONS RESULTED IN COMPLAINTS RECEIVED BY OTO

30%	complaints which do not fall under the NABU jurisdiction
25%	other
17%	law-enforcement agencies
13%	local governments
7%	executive authorities
5%	courts
3%	state and municipal enterprises
1%	fiscal service agencies

GEOGRAPHY OF MEETINGS WITH THE PUBLIC



TOP 5 ISSUES MENTIONED IN COMPLAINTS RECEIVED BY ODESA TERRITORIAL OFFICE

- illegal decisions, actions or inaction of state authorities and local governments
- illegal decisions, actions or inaction of the law enforcement officers
- receiving or extortion of improper advantage by the officials of the state authorities and local governments
- submission of false data by the official authorized to perform functions of the state or local governments
- delivery of a knowingly unfair decision by a judge in order to receive improper advantage

ACTIVITIES OF KHARKIV TERRITORIAL OFFICE IN FIGURES



- 68 | citizens accepted
- 21 | public events
- 17 | communications with media
- 15 | meetings with students

WHOSE ACTIONS RESULTED IN COMPLAINTS RECEIVED BY KhTO

- 43% | law-enforcement agencies
- 32% | courts
- 21% | local governments
- 21% | executive authorities
- 14% | state and municipal enterprises
- 13% | other
- 12% | complaints which do not fall under the NABU jurisdiction
- 3% | Members of Parliament of Ukraine
- 2% | fiscal service agencies
- 1% | military officers of the Armed Forces of Ukraine

TOP 5 ISSUES MENTIONED IN COMPLAINTS RECEIVED BY KHARKIV TERRITORIAL OFFICE

- illegal decisions, actions or inaction of state authorities and local governments
- delivery of a knowingly unfair decision by a judge
- receiving or extortion of improper advantage by the officials of the state authorities and local governments, law enforcement officers
- illegal decisions, actions or inaction of the law enforcement officers during investigation of the criminal proceedings
- submission of false data by the official authorized to perform functions of the state or local governments

MATERIAL SUPPORT

In the first half of 2019 the National Anti-Corruption Bureau of Ukraine used 38% of the funding provided by the state budget

The National Bureau is funded by the state as part of the budget programme “Funding the operations of the National Anti-Corruption Bureau”, KPKVK category 6321010.

As of June 30, 2019, 140 purchases of goods, works, and services were announced, 92 contracts for 30.8 mln UAH were signed. The largest savings were made when purchasing project designs for structural repairs of the façade of the NABU building in Kyiv (441 thous. UAH) and Territorial Office in Odesa (310 thous. UAH), as well as structural repairs of Lviv Territorial Office (310.3 thous. UAH).

The deposit accounts opened by the NABU in authorised banks hold funds with no traces of criminal offences. As of June 30, 2019, the accounts hold 4.3 mln UAH, 146.6 thous. EUR (4.3 mln UAH), and 607.5 thous. USD (15.8 mln UAH), 159.5 thous. RUB (66.4 thous. UAH), and 5.8 thous. GBP (192.6 thous. UAH).

During the reporting period, the National Bureau received 518,300 UAH as international technical assistance from the U.S. Government and the European Union.

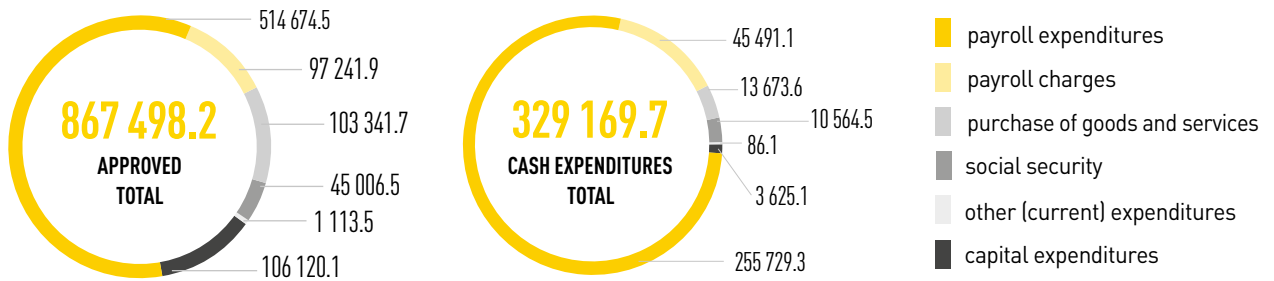
Additionally, 2.5 mln UAH was spent on 1,742 business trips of the National Anti-Corruption Bureau of Ukraine employees (including 63 trips abroad) to perform the tasks assigned to the NABU.

2.8
MLN UAH

was saved during
procurements in the
first half of 2019

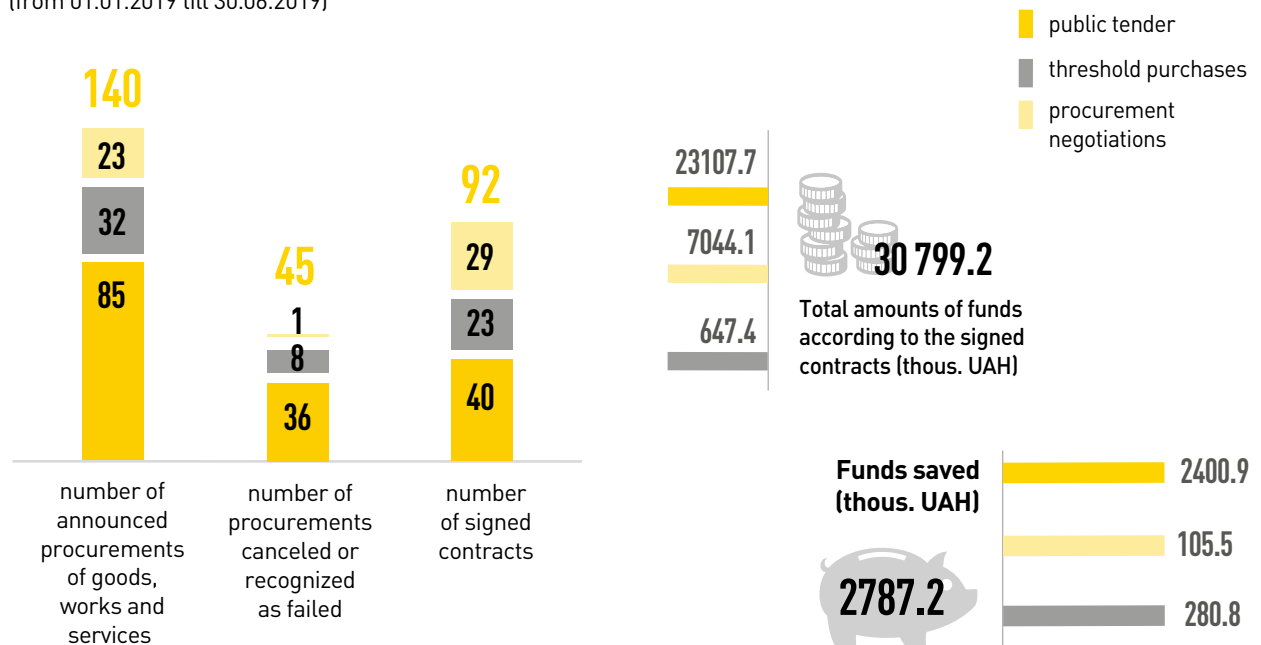
ANALYSIS OF EXPENDITURES AND PURCHASES

WITHIN THE GENERAL FUND OF THE STATE BUDGET IN THE FIRST HALF OF 2019



PURCHASE OF GOODS, WORKS AND SERVICES IN THE FIRST HALF OF 2019

(from 01.01.2019 till 30.06.2019)



PUBLIC CONTROL

To ensure the transparency and independence of the NABU operations in 2019, members of the Civil Oversight Council held a number of events; took part in recruiting and disciplinary commissions

In the first half of 2019, the Civil Oversight Council (COC) held nine public events, including in different regions of Ukraine. Public in Poltava, Sumy, Dnipro, Zaporizhia, and Mariupol was informed on the NABU's work and the ways to file reports on corruption offences.

In February the expert examination "Analysis of the legislative regulation of pre-trial investigations after 'Lozovyi's amendments' to the criminal procedure law of Ukraine came into force" was presented. Representatives of the NABU, the SAPO, anti-corruption and non-governmental organisations attended the event.

At the initiative of the COC, a joint meeting of the NABU and the legal community was held with the aim of objective consideration of a lawyer's complaint about the actions of the NABU employees during a search of a residence.

Also, the COC initiated an extended meeting of the Disciplinary Commission of the NABU regarding the facts covered in a journalist investigation as of corruption at the SC "Ukroboronprom". In addition to two members of the Council, who are part of the Commission, three more members of the COC and representatives of international organisations were included in Commission to ensure transparency and independence. It was the first Disciplinary Commission to include independent observers.

277

INFORMATION
CHECKS

on candidates
were conducted

ACTIVITIES OF THE COC

(from 01.01.2019 till 30.06.2019)

ACTIVITIES OF THE CIVIL OVERSIGHT COUNCIL AT THE NABU IN FIGURES



29 meetings of the Competition Committee

6 official meetings of the Civil Oversight Council

4 meetings of the NABU's Disciplinary Committee



4 OFFICIAL STATEMENTS CONCERNING:

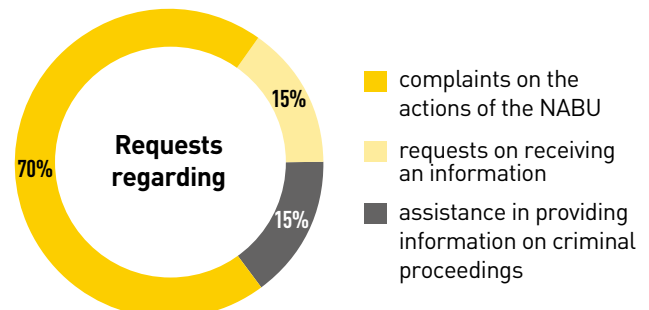
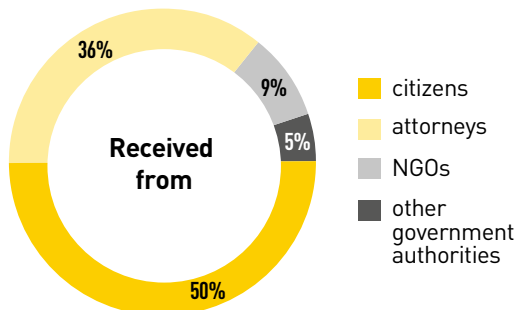
- correct indication of the role of participants in criminal proceedings by journalists
- obstruction of the work of judicial observers in the so-called "Krayan plant case"
- dismissal of the NABU employees during an internal investigation
- meetings of the NABU executives with representatives of presidential candidates



9 PUBLIC EVENTS:


- Meetings in the regions (Poltava, Sumy, Dnipro, Zaporizhzhia, Mariupol)
- "COC Reunion" (meeting of the COC members of all convocations with the aim of sharing experience)
- Presentation of the examination on the procedure for conducting pre-trial investigation after the entry into force of the "Lozoviy amendments"
- Presentation of the report of the activities of the COC of IV cadence
- Meeting with public organizations regarding participation in the competition to the COC

REQUESTS TO THE COC AT THE NABU





CHALLENGES



Before the work of the High Anti-Corruption Court starts, fear of responsibility makes the suspects in the NABU investigations create new challenges for the fight against corruption

ILLEGAL ENRICHMENT

The decriminalisation of illegal enrichment made it extremely difficult to cleanse government of corruption, especially at its highest levels

In February 2019, when the Constitutional Court of Ukraine ruled that the article on illegal enrichment is unconstitutional, it effectively decriminalised one of the key crimes which the new anti-corruption bodies were established to combat. As a result, the NABU and the SAPO were forced to terminate 27 criminal proceedings completely and 38 more where they pertained to Article 368-2 of the Criminal Code of Ukraine. As part of these proceedings, the NABU Detectives investigated the income and property of members of Parliament of Ukraine, prosecutors, judges, and central government officials.

The sanction for illegal enrichment was imprisonment for a period between 2 and 10 years with property confiscation. However, due to the ruling of the Constitutional Court, this threat to dishonest officials was removed. Even if the article is returned to the Criminal Code of Ukraine, it is impossible to resume pre-trial investigations into illegal enrichment that are already uncovered, because the law does not operate retrospectively.

This decision of the Constitutional Court of Ukraine coincided with the NABU and the SAPO intensifying their efforts to uncover instances of illegal enrichment. Interestingly, among those who appealed for such a decision were individuals against whom the NABU Detectives had already launched investigations under Article 368-2.

27

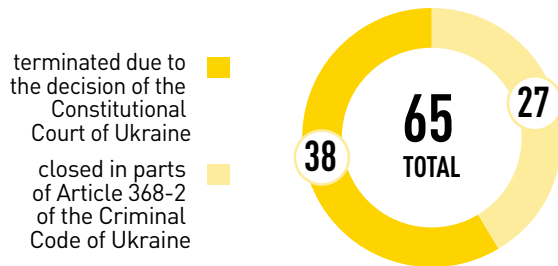
CRIMINAL PROCEEDINGS

were terminated
due to the decision
of the Constitutional
Court of Ukraine

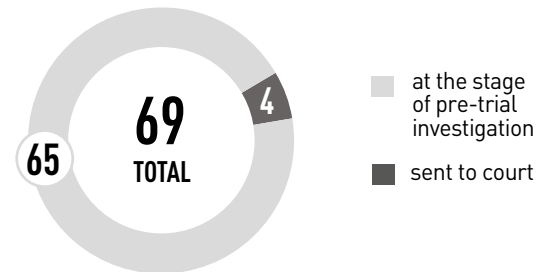
INVESTIGATION AS OF THE FACTS OF ILLEGAL ENRICHMENT

(as of 26.02.2019*)

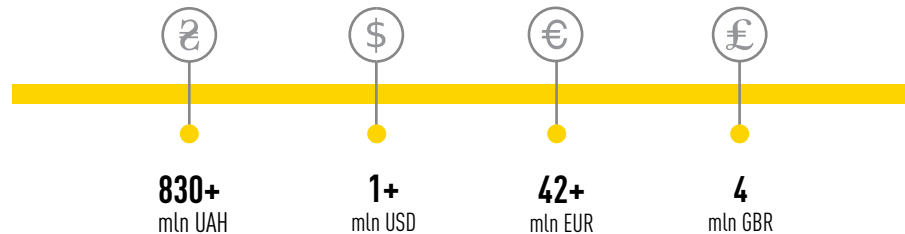
CRIMINAL PROCEEDINGS (REMAINING) UNDER ARTICLE 368-2 OF THE CRIMINAL CODE OF UKRAINE



CRIMINAL PROCEEDINGS UNDER ARTICLE 368-2 OF THE CRIMINAL CODE OF UKRAINE



TOTAL AMOUNT OF ILLEGAL ENRICHMENT THAT THE NABU INVESTIGATED*



TOP 5 CATEGORIES OF PERSONS UNDER THE NABU INVESTIGATION AS OF THE FACTS OF ILLEGAL ENRICHMENT*



* as of February 26, 2019, when the Constitutional Court of Ukraine declared Article 368-2 of the Criminal Code of Ukraine unconstitutional

CLAIMS WORK

Since the NABU was deprived of the authority to annul illegal agreements of state-owned enterprises through legal action, an effective instrument of liquidation of corrupt schemes has been lost

The lawsuits the National Bureau filed to annul agreements concluded by state-owned enterprises were an effective instrument of liquidation of corrupt schemes even at the pre-trial stage of investigation. Overall, the NABU was successful in annulling 102 agreements worth over 6 bln UAH in total. The relevant decisions entered into legal force, creating a basis for the return of funds.

However, in June 2019, the Constitutional Court of Ukraine stripped the NABU of the right to file lawsuits for agreement annulment, declaring it unconstitutional. The consequences of this could be extremely detrimental as the relevant court rulings that were used as evidence in the NABU proceedings could be declared inadmissible in criminal proceedings. On the other hand, attempts to renew onerous public contracts cannot be ruled out.

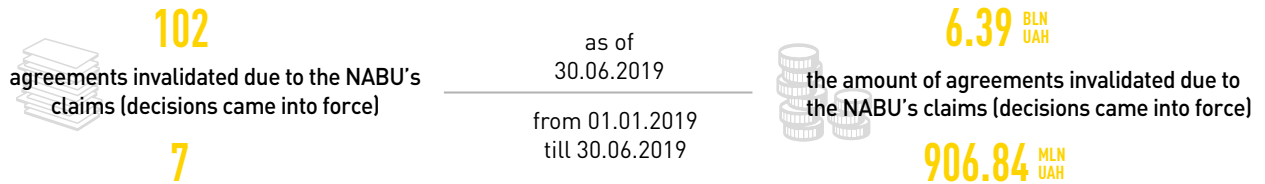
At the same time, in June 2019, the Supreme Court declared the annulment of the contract signed by SE "Ukrainian Sea Ports Authority" worth 712 mln UAH to be legal based on a lawsuit by the NABU. Thus, the court confirmed the legality of the NABU's right to appeal for contract annulment and the validity of previous court decisions of the kind despite the ruling of the Constitutional Court of Ukraine.

20+

ENTITIES

are involved in
transactions
canceled by the
NABU lawsuits

CLAIMS WORK



INVALIDATED AGREEMENTS: INDUSTRY BREAKDOWN

(from 01.01.2019 till 30.06.2019)



LEGAL SUPPORT OF CASES

(from 01.01.2019 till 30.06.2019)



Number of court hearings on cases on the NABU's claims on invalidation of agreements



- resolved in favor of the NABU
- resolved against the NABU
- pending

Participants of the agreements invalidated due to the NABU's claims:

- PJSC "Ukrnafta"
- LLC "Kotlas"
- PJSC "Azot"
- PJSC "Cherkassyoblenergo"
- PJSC "Zaporizhzhiaoblenergo"
- PJSC "Zaporozhye Ferroalloy Plant"
- PJSC "Electrometallurgical Works "Dniprospsstal"
- LLC "Zaporizhzhia Titanium and Magnesium Combine"
- PrJSC "Energomezha Holding Company"
- JSC "Kharkivoblenergo"
- ME "KharkivVodokanal"
- LLC "Transferbutik"
- PJSC "Ukrzaliznytsia"
- LLC "Wog Aero Jet" [changed its name to "Volen Trade"]
- SE "Management of Industrial Enterprises of the State Administration of Railway Transport of Ukraine"
- PrJSC "Korosten Plant of Ferro-Concrete Sleepers"
- SE "Ukrainian Sea Ports Authority"
- LLC "Tekhmorhidrostroy"
- SE "Coal Company "Krasnolymanska"
- LLC "Dantrade Ltd."
- LLC "Torhivelnyi Dim-Resurs"

CASES IN COURTS

Starting this September, the High Anti-Corruption Court will have to ensure impartial consideration of high-profile corruption cases. The NABU and the SAPO will send the cases within its jurisdiction to it

In the first half of 2019, the NABU Detectives drafted and the SAPO Prosecutors sent 31 indictments to court, as well as one petition for the release of a person from criminal liability. However, only the case of the OJSC "HC "Kraian" was reviewed quickly. In the case as of the mayor of Odesa, the judges managed to study over 65 volumes of written evidence, hear witnesses, and pronounce a sentence in six months. This happened just before the High Anti-Corruption Court started its work.

For example, in the case as of the facts of causing damage to the the PJSC "SFGCU", the court spent nearly a year considering a single petition to joint two proceedings (concerning 38.5 mln UAH and 50 mln UAH, respectively). In late March 2019, the court refused to joint the proceedings. A year later, none of these cases reviewed.

After the announcement that the High Anti-Corruption Court is to start its work in September 2019, the judges of the first instance court realised they would soon "be rid of" high-profile corruption cases and started appointing hearings for the autumn. Clearly, it makes no sense to hear cases that will be send to another jurisdiction. Therefore, the NABU and the SAPO hope that the newly created anti-corruption court will start its work on time and will be able to mark a decisive end to cases over the illegal actions of officials.

32 CASES

were sent to court
by the NABU and
the SAPO in the
first half of 2019

CASES IN COURTS

(as of 30.06.2019)



CASES SENT TO COURT

208



HEARINGS HAVE STARTED

118



SENTENCES*

31



HEARINGS HAVEN'T STARTED **50**

40

CASES WITH COURT DECISION



Reasons of trial delays

appeal consideration of the decision on returning of the indictment	3
cases sent in June 2019	7
failure to appear in court	2
other reasons	13
inability to form a panel of judges	4
lack of time of judges / vacations	15
problems with determining jurisdiction	6

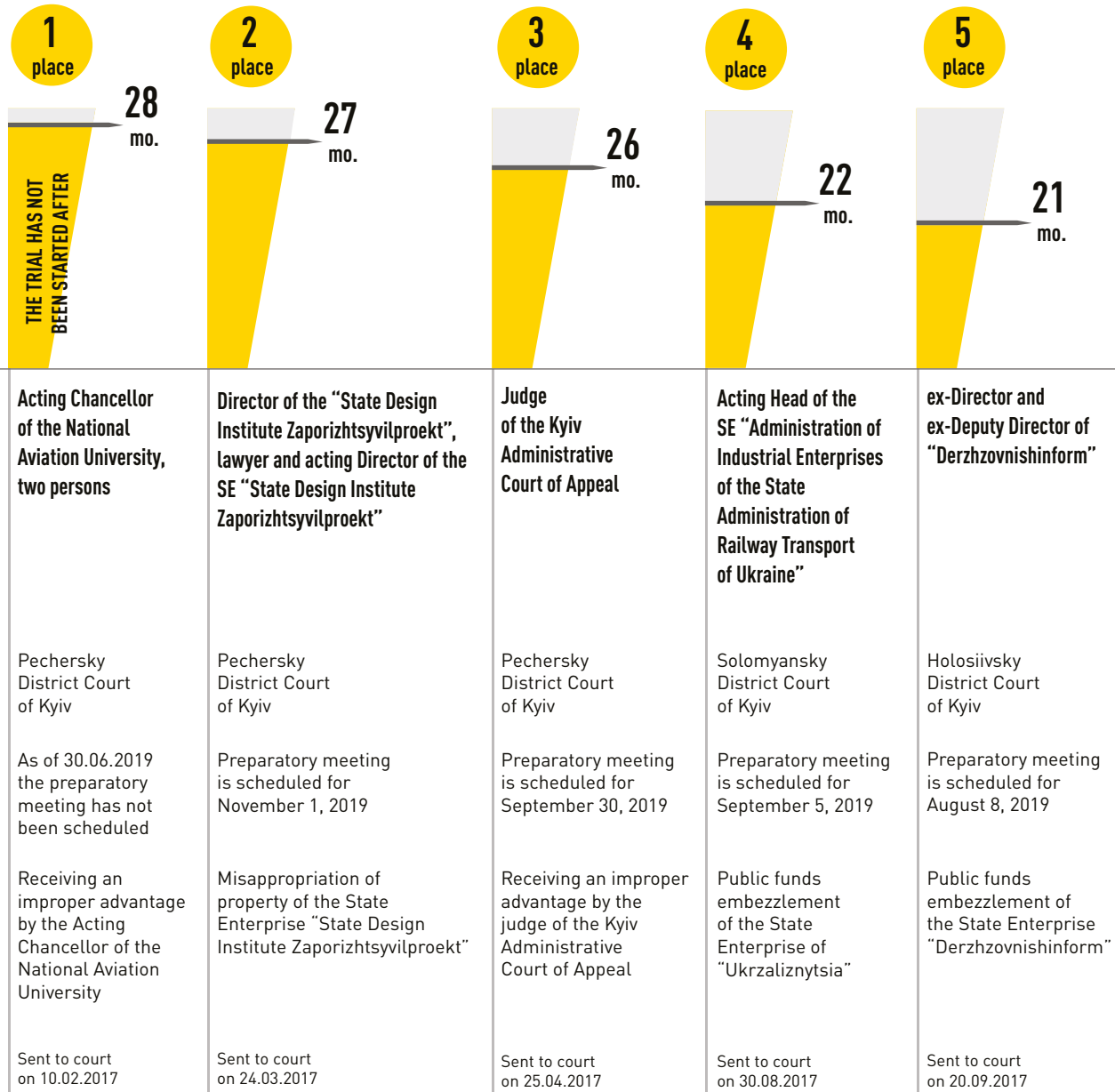
Court decision — details

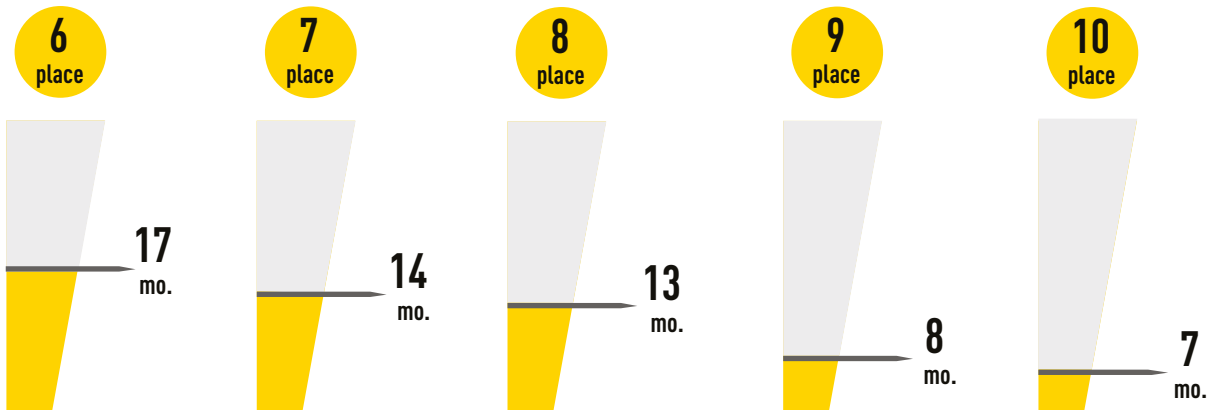
30	sentences including in accordance with plea bargain agreements
7	decisions on releasing from criminal liability
1	decision on terminating the proceeding
1	decision cancelled by the Court of Appeal
1	not-guilty verdict*

*One of the decisions was canceled by the Kyiv Court of Appeal; the case was directed to conduct pre-trial investigation in the general order. Then the criminal proceeding was joined with another case. The decision as of the same persons was passed and came into force. Three more decisions are appealed.

TOP-10 OF CASES` DELAYS IN COURTS

(as of 30.06.2019)





<p>Deputy of the Khmelnytsky Regional Council</p> <p>Khmelnytsky City and District Court of Khmelnytsky obl.</p> <p>Preparatory meeting is scheduled for September 10, 2019</p> <p>Receiving an improper advantage by a Deputy of the Khmelnytsky Regional Council</p> <p>Sent to court on 18.01.2018</p>	<p>Representative of the group of commercial companies</p> <p>Solomyansky District Court of Kyiv</p> <p>Preparatory meeting is scheduled for August 6, 2019</p> <p>Public funds embezzlement of the SE "Ukrzaliznychpostach"</p> <p>Sent to court on 25.04.2018</p>	<p>Head of the Druzhkovsky City Court of Donetsk obl., prosecutor, two persons</p> <p>Balakiysky District Court of Kharkiv obl.</p> <p>Trial is scheduled for September 6, 2019</p> <p>Receiving an improper advantage and submitting false data to e-declarations by the Head of the Druzhkovsky City Court of Donetsk obl.</p> <p>Sent to court on 21.05.2018</p>	<p>2 MPs, an MP assistant, a representative of "Parliamentary Control", two persons</p> <p>Pechersky District Court of Kyiv</p> <p>Preparatory meeting is scheduled for September 12, 2019</p> <p>Receiving an improper advantage for the assistance to a foreign company in the realization of amber mining in Ukraine</p> <p>Sent to court on 05.10.2018</p>	<p>Ex-Head of the SE "Lutsk Combine of Bakeries №2" and a Head of the elevator</p> <p>Lutsk City and District Court of the Volyn obl.</p> <p>Trial is scheduled for August 15, 2019</p> <p>Causing more than 58 mln UAH damage to the SE "Lutsk Combine of Bakeries №2"</p> <p>Sent to court on 29.11.2018</p>
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APPENDICES TO THE REPORT

These appendices contain statistical information on the NABU activities in the first six month of 2019 as required by **Article 26 of the Law of Ukraine “On the National Anti-Corruption Bureau of Ukraine”**.

1. STATISTICAL DATA ON THE RESULTS OF ACTIVITIES

from 01.01.2019 till 30.06.2019

№	Activity category	Result
1.	Number of registered applications and reports on criminal offences classified by the law as those under the jurisdiction of the National Bureau	533
2.	Number of investigations initiated by the National Bureau and their results	13
		5
3.	Number of persons standing indicted for committing criminal offenses classified by the law as those under the jurisdiction of the National Bureau	70
4.	Number of persons officially found guilty of committing criminal offences classified by the law as those under the jurisdiction of the National Bureau	3
5.	Number of persons officially declared innocent of committing relevant criminal offences	—
6.	Information by categories of persons indicated in Part 1 Article 3 of the Law of Ukraine “On Preventing Corruption”	**
7.	Information on the amount of losses and damage caused by criminal offences classified by the law as those under the jurisdiction of the National Bureau, status and the amount of compensation	221 286 970 000*UAH****
		562 881 000* UAH including in the first half of 2019: 107 806 566 UAH
8.	Information on the funds and other property received as a result of criminal offences, classified by the law as those under the jurisdiction of the National Bureau, confiscated by court decisions as well as the funds in the amount of illegally received services or benefits refunded to the State and their use	—

Nº	Activity category	Result
9.	Information on the funds and other property received as a result of criminal offences classified by the law as those under the jurisdiction of the National Bureau, which were recovered to Ukraine from abroad, and their keeping	—
10.	Information on seizure of property, confiscation of objects and funds acquired as a result of criminal offences classified by the law as those under the jurisdiction of the	***
11.	Number of submissions made as of the elimination of causes and conditions which contributed to commitment of a criminal corruption offence	4
12.	The results of integrity tests	3 checks, 1 negative result

*as of 30.06.2019

**** approximate amount of losses examined during pre-trial investigation

**Information as of categories of persons referred in Part 1 of Article 3 of the Law of Ukraine "On Preventing Corruption"

as of 30.06.2019

Nº	The subject	Number of individuals notified of suspicion, total per each category	Number of indicted persons, total per each category	Number of convicted persons, total per each category
1.	Persons authorized to perform state or local government functions:			
	a) senior officials of the state (the President of Ukraine, the Chairman of the Parliament, the First Deputy Chairman of the Parliament, the Prime Minister, the First Deputy Prime Minister, the Vice Prime Ministers, the Ministers, other Heads of the Central Executive authorities outside of the Cabinet of Ministers of Ukraine, and their deputies, the Head of the Security Service of Ukraine, the Head of the National Bank of Ukraine, the Attorney General, the Chairman and other Members of the Accounting Chamber of Ukraine etc.)	2	6	0

	b) Members of Parliament of Ukraine, deputies of the Verkhovna Rada of the Autonomous Republic of Crimea, deputies of local councils, village, settlement, city mayors	2	15	0
	c) public officials, officials of local government	7	7	0
	d) military officers of the Armed Forces of Ukraine, the State Service for Special Communications and Information Protection of Ukraine and other military units formed in accordance with the laws	5	5	0
	e) judges	10	34	0
	f) rank members and commanding staff of the state penal service, the tax police, the commanding staff of civil protection bodies and departments, the State Investigations Bureau, the National Bureau	0	0	0
	g) officials of the prosecutor's offices, the Security Service of Ukraine, the State Investigations Bureau, the National Anti-Corruption Bureau of Ukraine, the diplomatic service, the state forest protection, the state protection of the nature reserve fund, the central executive authority, responsible for formation and implementation of the state tax policy and state customs policy	1	28	2
	h) the National Agency on Corruption Prevention members	0	0	0
	i) members of the Central Election Commission	1	5	0
	j) police officers	0	19	0
	k) officials of other state authorities, authorities of the Autonomous Republic of Crimea	5	0	0
	l) members of state collegial bodies	0	0	0
2.	Persons who, for the purposes of the Law, have an equal status to persons authorized to perform functions of the state or local self-government:			

	a) officials of legal entities of public law which are not referred to in Clause 1 Part 1 of the abovementioned Article, members of the supervisory board of a state bank, state enterprise or state-owned organization working with the purpose of receiving profit	37	76	0
	b) persons who are not public officials, officials of local government but provide public services (auditors, notaries, appraisers etc.), as well as experts, arbitration managers, independent intermediaries, arbitrators etc.	3	0	0
	c) representatives of public associations, educational institutions, who are members of the competition commissions formed according to the Law "On Civil Service", "On the Judicial System and Status of Judges", while not being persons referred to in Clause 1, Paragraph "a" Part 2	0	0	0
	Persons who are not officials but permanently or temporarily hold positions related to fulfillment of organizational, administrative or business duties, or specifically authorized to perform such duties in legal entities of private law, regardless of organizational form	13	0	0
	Candidates for Members of Parliament of Ukraine, for the President of Ukraine, regional, district, city, district in cities, village, settlement councils, candidates for village, settlement, city mayors and prefects	0	0	0
	Individuals who receive funds, property within the framework of programs of technical or other assistance, that are being conducted in Ukraine, in the field of prevention of and counteraction to corruption; systematically throughout the year provide works/services on implementation of standards in the field of anti-corruption policy; leaders or members of a supreme governing body, other executives bodies of non-government organizations, other non-profit associations that conduct activities related to implementation of the anti-corruption policy	0	0	0
	Other	53	160	26

*** Information on seized property, items and proceeds of crimes legally counted under the jurisdiction of the National Bureau and the way they were used

as of 30.06.2019

Nº	Type of property	Total amount
1.	Land plots	388
2.	Residential real estate, including:	195
	abroad	3
3.	Non-residential real estate, including:	179
	abroad	-
4.	Means of transportation	119
5.	Funds, including:	
	in UAH	30 390 559
	in USD	741 145
	in EUR	1 674 877
	in Croatian kuna	22610
	in other currencies	343 577
7.	Computer equipment (number of items)	141
8.	Mobile phones	158
9.	Jewellery (number of items)	107 and 236 coins
10.	Participatory interests, UAH	102 886 899
11.	Other, including:	
	trimodal medical diagnostic system	2
	explosion-proof suits	2
	watches, number of items	5
	securities, UAH	9 895 216

JANUUA

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