



EASTERN  
HUMAN RIGHTS  
GROUP

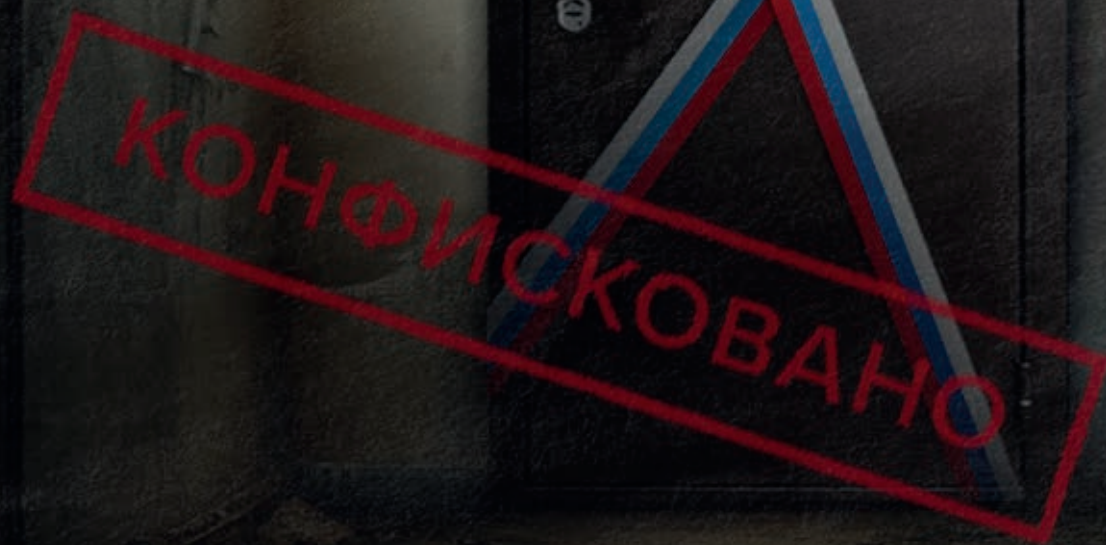


INSTITUTE  
FOR STRATEGIC STUDIES  
AND SECURITY



NATIONAL  
ENDOWMENT  
FOR  
DEMOCRACY

# Confiscation



2024



EASTERN  
HUMAN RIGHTS  
GROUP



INSTITUTE  
FOR STRATEGIC RESEARCH  
AND SECURITY

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Analytical report

# Confiscation of property

in the occupied territory  
of Ukraine

This analytical report was prepared by the Eastern Human Rights Group and the Institute for Strategic Research and Security based on materials collected in 2020-2024

December  
**2024**



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# Introduction

**EASTERN HUMAN RIGHTS GROUP (EHRG)** is a non-profit organization of lawyers, advocates, and human rights activists from the eastern regions of Ukraine. The goal of the organization is the comprehensive protection of human rights, constant monitoring of human rights observance, advocacy of the principles of democracy and human rights in the southeastern regions of Ukraine and in the territories of Ukraine temporarily occupied by the RF.

**INSTITUTE FOR STRATEGIC RESEARCH AND SECURITY** is a non-profit and non-governmental association of experts in the field of Kremlinology, security and political science that studies the processes in the RF related to the aggressive policy against Ukraine and other countries. EHRG and ISRS in their activities are guided, first of all, by the norms of the main documents in the field of human rights, namely: the Universal Declaration of Human Rights, the Convention on the Rights of the Child, the Declaration on the Rights of the Child, the Helsinki Final Act, the Convention for the Protection of Human Rights and Fundamental Freedoms, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the Constitution of Ukraine, etc.

## The main tasks of the EHRG and ISRS are:

- Comprehensive protection of human rights in the south-eastern regions of Ukraine, including in the territory of Ukraine temporarily occupied by the RF.
- Collection and analysis of information regarding the human rights situation in the south-eastern regions of Ukraine, including in the territory of Ukraine temporarily occupied by the RF.
- Wide informing of state authorities of Ukraine, international organizations, intergovernmental structures, non-governmental organizations, mass media, and other target groups by publishing and disseminating information materials on the situation with human rights violations in the south-eastern regions of Ukraine, including in the territory of Ukraine temporarily occupied by the RF.
- Drawing public attention to the problem of human rights violations in the south-eastern regions of Ukraine, including in the territory of Ukraine temporarily occupied by the RF.
- Promoting the development of mechanisms for the protection of human rights and compliance with international law in the south-eastern regions of Ukraine, including in the territory of Ukraine temporarily occupied by the RF.


**In preparing and disseminating information, EHRG and ISRS are guided by the principles of objectivity, honesty, and reliability.**




**The Joint Information and Analytical Group "EHRG" and "ISRS"** (hereinafter referred to as the JIAG "EHRG") is a joint analytical department of the EHRG and ISRS organizations, the purpose of which is to collect information on

human rights violations, events, and trends that affect the situation with the observance of human rights in the territories of Ukraine temporarily occupied by the RF. In its research, JIAG "EHRG" uses closed and open sources of information.


### The main tasks of the JIAG "EHRG" and "ISRS" are:



Collection and analysis of information related to human rights violations in the territory of Ukraine temporarily occupied by the RF.



Preparation of thematic reports aimed at covering hidden topics that affect the situation with respect for human rights in the territory of Ukraine temporarily occupied by the RF



Organization of a closed and open system of reporting on human rights violations in the territory of Ukraine temporarily occupied by the RF

## Methodology

This analytical report was prepared by the Joint Information and Analytical Group of "EHRG" and "ISRS" (hereinafter referred to as JIAG "EHRG").

The report is based on research conducted in the period from 2021 to 2024. The main objective of the study is to examine cases of confiscation of property of Ukrainian citizens who are in the temporarily occupied territory of Ukraine. Confiscation is a system developed by the dictatorial regime of the Kremlin, which is aimed at destroying the material ties of residents of the temporarily occupied territories of Ukraine. In this way, the occupation administrations of the RF move local residents, and their property is given to citizens of the RF who come to the temporarily occupied territories of Ukraine. Closely related to the confiscation of property is the ban on entry for citizens of Ukraine to the temporarily occupied territory, which has been in effect since October 2023.

In this analytical study, general scientific and special scientific methods were used: comparative, observation, analysis and synthesis, structural and functional, and others. As well as interviews with those who faced problems of confiscation of their property. The methods of comparison, induction, and deduction were used when considering the organization of the property confiscation system in the occupation. Analysis and synthesis were used when studying the causes and features of property confiscation in the temporarily occupied territory. The observation method was used when analyzing the activities of the occupation administrations in confiscation and distribution of confiscated property for citizens of the RF. The systemic method was used in analyzing the impact of the system of confiscation of real estate, industrial enterprises, and land plots from citizens of Ukraine and the further distribution of confiscated property among citizens of the RF. The structural and functional methods were used when considering the negative consequences for the local population who were subjected to the procedure of confiscation of their property.

During the analytical study, 42 interviews were conducted with local residents of the occupied territories, and their relatives, who witnessed the confiscation of property of local residents. We publish several interviews in this analytical report.

# General information

With the beginning of the military aggression of the RF and the occupation of the territories of the Luhansk and Donetsk Oblasts in 2014, the occupants began the process of confiscating the property of local residents. But this procedure was chaotic and was even recognized as illegal by the occupation administrations. It is necessary to understand that from 2014 to 2016, the process of establishing occupation administrations took place in the occupied territories of the Luhansk and Donetsk Oblasts. It is worth noting that in 2014-2015, in the occupied part of the Luhansk Oblast, the occupation administrations of IAF LPR controlled only 30% of the territories, and only 20% in the occupied part of the Donetsk Oblast. The rest of the control over the occupied territories belonged to pro-Russian units, which not only exercised control over the occupied territory but also committed crimes against the local population.

But the confiscation of property of the local population of the occupied territories in 2014-2016 can be considered non-systemic actions of armed pro-Russian formations. The systematic work of the occupation administrations, which concerned the confiscation of property of local residents in the temporarily occupied territories of Ukraine, began in 2020. It is worth distinguishing between the confiscation of property of individuals and the property of legal entities. In other words, the confiscation of industrial enterprises began much earlier, and in 2020, the process of confiscating real estate from local residents began.

After the full-scale invasion of the RF and the annexation of the temporarily occupied territories of Ukraine, representatives of the occupation administrations began to make decisions aimed at the mass confiscation of property from local residents.



## **Thus, in 2024, the occupation administrations made the following decisions:**

- Occupation administration of the RF in the Luhansk Oblast. On June 27, 2024, the "LPR's People's Council" adopted the "LAW" No. 77-1 "On the specifics of identifying, using, and recognizing the right of municipal property of municipal entities of the 'Luhansk People's Republic' to residential premises that have signs of ownerless property located on the territory of the 'Luhansk People's Republic'".
- Occupation administration of the RF in the Donetsk Oblast. On March 21, 2024, the "People's Council of IAF DPR" adopted the "LAW" "On the specifics of identifying, using, and recognizing the right of municipal property of municipalities of the Donetsk People's Republic to residential premises that have signs of ownerless property located on the territory of the Donetsk People's Republic."
- Occupation administration of the RF in the Zaporizhzhia Oblast. On May 20, 2024, the "Legislative Assembly of the Zaporizhzhia Oblast" adopted the "LAW" "On the specifics of regulating property rights in relation to real estate objects in the form of residential premises that have signs of ownerless property located in the territories of the Zaporizhzhia Oblast."
- Occupation administration of the RF in the Kherson Oblast. On March 22, 2024, the "Government of the Kherson Oblast" adopted Resolution No. 25 "On approval of the procedure for identifying and using residential premises with signs of ownerless property in the territory of the Kherson Oblast."



These "laws" that were adopted by the occupation administrations fully describe the procedure for alienation of real estate from Ukrainian citizens who live in the temporarily occupied territories of Ukraine but were forced to leave due to the beginning of the military aggression of the RF against Ukraine. At the moment, this mechanism, which was developed by the occupation administrations of the RF, has already been put into effect. According to the heads of the occupation administrations of the RF in Ukraine, in 2024, thousands of apartments of Ukrainian citizens who previously lived in the temporarily occupied territories of Ukraine were nationalized. The confiscated real estate is transferred to the disposal of the occupation administrations, which are called "municipalities", and subsequently, this property can be transferred to citizens of the RF who come to the temporarily occupied territory of Ukraine to work in the occupation administrations and law

enforcement agencies of the RF. We have also recorded cases when confiscated property was put up for sale for citizens of the RF. The sale took place through the provision of a mortgage loan for citizens of the RF.

Thus, the actions of the occupation administrations indicate a massive violation of the property rights of residents of the temporarily occupied territories of Ukraine. It can also be concluded that people whose real estate was confiscated do not have the opportunity to return to the temporarily occupied territories of Ukraine, and their property is transferred to citizens of the RF. Thus, the occupation administrations are gradually carrying out the process of resettling citizens of the RF to the occupied territories of Ukraine, and displacing local residents. In our opinion, such actions indicate a massive and forced resettlement of citizens of the RF to the occupied territories of Ukraine in order to displace citizens of Ukraine.

# Summary

## of the analytical report "Confiscation of property in the occupied territories of Ukraine"

1

### **Expropriation of private and commercial real estate.**

The Russian occupation administrations are systematically expropriating real estate in the temporarily occupied territories of Ukraine, including residential buildings, businesses, and land plots. The expropriation is carried out under the pretext of "mismanagement" of the property or through forced external management.

2

### **Economic control and redistribution of assets.**

The companies involved are integrated into the Russian economy through specially created structures, such as the PPK "Fund for Development of Territories". These structures are used to provide funding for the occupation administrations and support the Russian economy.

3

### **Demographic and administrative changes.**

Russia is pursuing a policy of population replacement, resettling its citizens in the occupied territories, creating incentives through preferential mortgages and high salaries. At the same time, the Ukrainian population is being deprived of property rights and the ability to appeal the actions of the occupation authorities.

4

### **Organization of headquarters for increasing income and registering property.**

In June 2024, headquarters were established in the occupied territories to legalize employment and register rights to real estate and land. Their task is to identify unregistered objects and transfer data to the Federal Property Management Agency and Rosreestr for further registration.

5

### **Confiscation of agricultural land.**

Since June 2023, the confiscation of agricultural lands has begun, involving them in a program that allows the transfer of land plots for lease to Russian farmers. Ukrainian landowners associated with the financing of the Armed Forces of Ukraine are deprived of their property rights.

6

### **Inventory of lands and real estate.**

In 2024, Rosreestr intensified the inventory of more than 5.5 million real estate objects in order to transfer data to the Unified State Register of Real Estate (USRRE). The process includes aerial photography, compilation of cadastral data, and preparation of objects for sale to Russian investors.

7

### **Priority in confiscation of residential properties.**

Confiscated apartments and houses are primarily provided to Russian security forces and civil servants. This is accompanied by restrictions on the rights of local residents, in particular, mass refusals to register property.

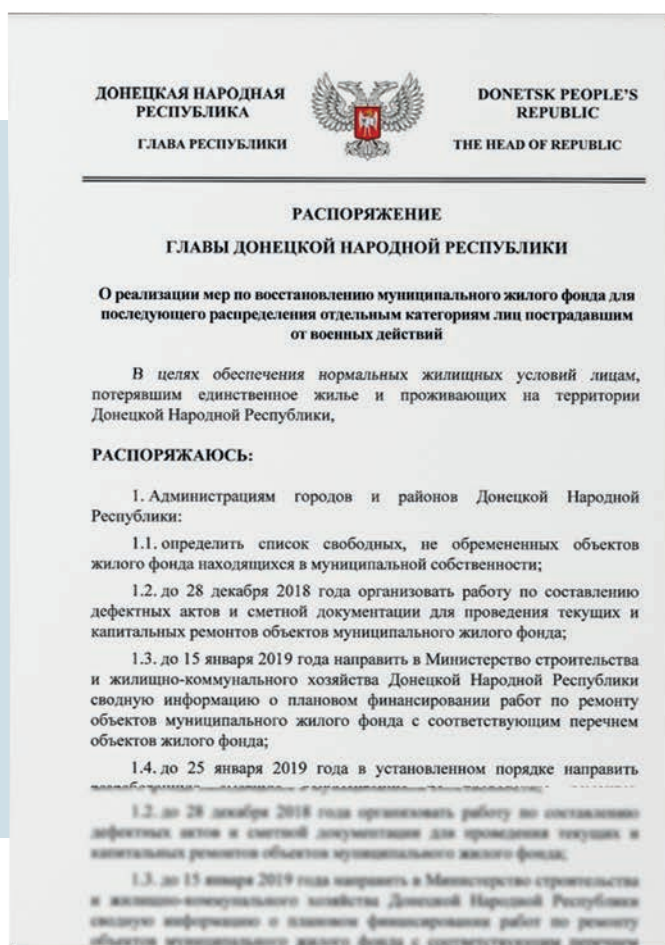


# Confiscation

## of apartments and real estate of Ukrainian citizens in the temporarily occupied territories of Ukraine

Following the occupation of certain parts of the Luhansk and Donetsk Oblasts in 2014, a mechanism was developed in the occupied

territories for the confiscation of real estate (apartments and houses) belonging to Ukrainian citizens who had left the occupied territories.



Decree of the head of the occupation administration of the IAF DPR No. 152 of December 25, 2018 "On the implementation of measures to restore the municipal housing stock for subsequent distribution to certain categories of persons affected by military actions"




The confiscation of real estate (apartments and houses) belonging to citizens of Ukraine was carried out under the guise of "creating a temporary housing stock". The confiscation procedure was regulated by the "Temporary procedure for the provision of residential premises of the temporary housing stock", approved by the decree of the occupation government of IAF LPR dated June 19, 2016, No. 374, and the Decree of the head of the occupation administration of IAF DPR No. 152, dated December 25, 2018 "On the implementation of measures to restore the municipal housing stock for subsequent distribution to certain categories of persons affected by military operations."

The adopted documents provided for the creation of a temporary housing stock intended for the temporary residence of persons "whose housing is located on the territory of the Republics and has been completely or partially destroyed as a result of military operations," as well as the procedure for opening "residential premises in which no one lives."

After the start of a full-scale invasion in February 2022, the well-established mechanism of confiscation of real estate (apartments and houses) belonging to Ukrainian citizens who left the occupied territories was extended to the territories of Luhansk, Donetsk, Zaporizhzhia, and Kherson Oblasts captured by the RF.

At the first stage, due to the lack of a legislative framework that regulated the procedure for confiscation, housing stock in the occupied territories was also confiscated under the pretext of helping residents/displaced persons "whose living quarters were damaged or lost as a result of military operations, and who need living quarters from the temporary housing stock." In the temporarily occupied territories, uniform "procedures for registering citizens

whose residential premises were damaged or lost as a result of military operations and who need residential premises of the maneuverable housing stock, their resettlement in such premises, as well as the provision of compensation to the owners of residential premises included in the maneuverable fund" were approved, which were adopted in September-October 2022.

 **Администрация города Северодонецка ЛНР**  
6 дек 2022 · Госорганизация

Часть 3

Администрация города Северодонецка уведомляет о планируемом вскрытии жилого помещения и о необходимости явки собственника в Администрацию города Северодонецка с целью предоставления согласия на вселение в жилое помещение сроком на 3 года или же отказе в предоставлении согласия на вселение.

Список адресов прилагается.

**Перечень квартир многоквартирных жилых домов города Северодонецка Луганской Народной Республики, в которых производится доступ без согласия собственников**

1	г. Северодонецк пр. Гвардейский, 61	11,12,13,20,24,26,27,28,38,47
2	г. Северодонецк ул. Гагарина, 86	1,19,20,25,32,41,42,44,46,47,53,54, 56,57,58,64,66,68,69,70,71,73,75,78, 79,80,82,84,87,88,91,93,94,95
3	г. Северодонецк ул. Гагарина, 94	4,9,10,11,13,15,16,18,19,20,32,39, 40,41,45,46,54,55,60,61,63,64,68,69,72,73,74,75,76, 86,88,92,93,94,99
4	г. Северодонецк ул. Гагарина, 96а	1,2,4,6,7,8,9,10,12,14,15,17,18,20, 21,25,26,28,29,34,35,36,38,52,53,54,55,57,58,60,61, 62,63,64,66,67,68,69
5	г. Северодонецк пр. Гвардейский, 55а	2,8,9,11,13,16,17,18,26,27,28,30,34, 38,39,41,42,53,58,61,63,65,66,67,68, 69
6	г. Северодонецк пр. Гвардейский, 55б	1,2,3,4,5,6,7,8,10,12,13,14,15,16,18, 19,20,21,22,23,24,25,26,28,29,30,32, 35,36,37,38,39,40,42,44,46,47,48,49, 50,53,54,55,56,57,58,59,60,61,62,65, 66,67,69,72,73,76,77,78,80,82,83,84, 85,86,87,88,89,90,91,92,93,94,95,96, 97,99,100
7	г. Северодонецк пр. Гвардейский, 57а	5,6,10,11,14,15,16,17,20,21,22,24, 25,29,31,32,33,36,37,42,44,50,52,53, 55,57,58,60,61,63,64,65,66,67,68,70
8	г. Северодонецк пр. Гвардейский, 57б	1,3,5,10,12,13,14,19,21,23,24,25,27,28,29,30,31,33,3 4,43,45,46,51,54,56, 59,61,62,63,65,66,68

Housing stock in the occupied territories was also confiscated under the pretext of helping residents "whose living quarters were damaged or lost as a result of military operations and who need living quarters from the temporary housing stock."

The formation of the maneuverable housing stock was formed by the occupation administrations from residential premises in which "no one lives." Information about residential premises in which no one lives was received by the occupation administrations on the basis of "applications for the identification of residential

premises with signs of such in which no one lives, which were submitted by individuals, municipal unitary enterprises, and state unitary enterprises." In order to create the maneuverable housing stock, permanent commissions were created under the occupation administrations to identify and inspect residential premises in which no one lives.

The powers of the created commissions also included the right to “open residential premises in which no one lives.”

In particular, there was a decree of the head of the occupation administration of IAF LPR No. UG-953/22 of September 27, 2022 “On approval of the Procedure for registering citizens whose residential premises were damaged/lost as a

result of military operations and who need residential premises of the maneuverable housing stock, their resettlement in such premises, as well as the provision of compensation to owners of residential premises included in the maneuverable housing stock” that provided for the following procedure for opening apartments belonging to citizens of Ukraine:



Upon checking the availability of residential premises in which no one lives, the commission draws up a report on the availability of residential premises. In addition, at the entrance of the apartment building in which the residential premises are located/at the entrance doors of the courtyard on the territory of which the residential premises are located, as well as in the periodical printed publication of the Government of the Luhansk People's Republic—the newspaper 'Respublika'—and on the official website of the Administration (if available), a notice is posted about the planned opening of the residential premises and the need for the owner to appear (within 10 calendar days from the date of posting the notice) at the

Administration in order to provide consent to move into the residential premises for a period of 3 (three) years/refusal to provide consent to move into the residential premises.

If the owner does not appear at the Administration within 10 calendar days from the date of posting the notice, the commission will make a decision to open the residential premises within three working days.

The Administration shall notify the prosecutor's offices of the occupation administrations of the date of opening of the residential premises no later than 24 hours before its opening."



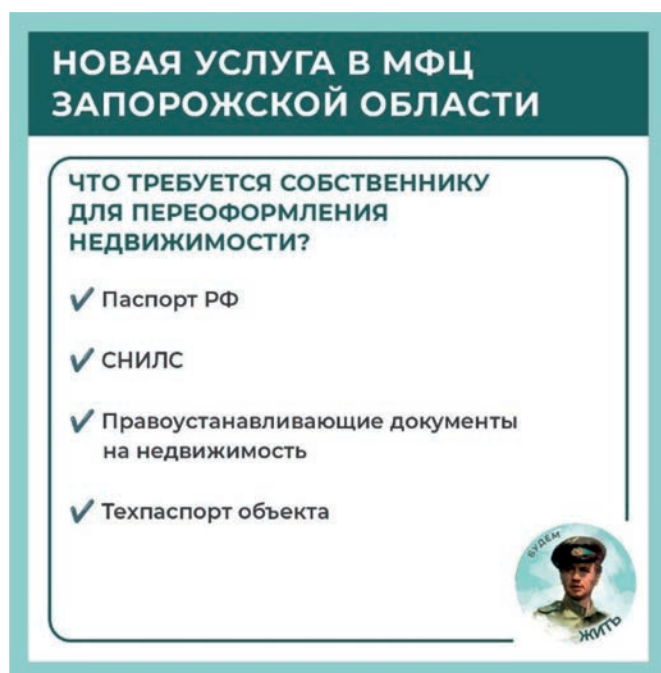
In January 2023, the Rosreestr bodies created in the occupied territories began registering property rights to residential buildings, apartments, and rooms in accordance with Russian legislation. To register property rights from residents of the occupied territories until October 2023, passports confirming Ukrainian citizenship, as well as powers of attorney issued to Ukrainian notaries, were accepted. Since October 17, 2023, Rosreestr offices in the occupied territories have stopped accepting documents for real estate registration from foreign citizens and citizens of Ukraine.

The Rosreestr offices in the temporarily occupied territories reported that “Since October 17, the acceptance of documents for entering information into Rosreestr in MFC departments for foreign citizens and citizens of Ukraine (stateless persons), including when submitting an application through a representative who has Russian citizenship, is unacceptable.” To receive real estate

registration services, the property owner must be a citizen of the RF.

In the summer of 2024, another tightening of legislation followed in the occupied territories, related to the confiscation of real estate belonging to citizens of Ukraine. Starting from June 2024, it became possible to enter into inheritance rights in the temporarily occupied territories only with a Russian passport.

The Rosreestr bodies in the occupied territories reported that they carry out the registration of real estate for “entering into inheritance only with a document confirming Russian citizenship.” To enter into inheritance rights, it was necessary to enter property data into the Unified State Register of Real Estate and register the real estate object with the state cadastral register of the RF—these operations were also provided only if the applicant had a Russian passport.



From October 17, 2023, Rosreestr offices in the occupied territories stopped accepting documents for real estate registration from foreign citizens and citizens of Ukraine



Starting from June 2024, it became possible to enter into inheritance rights in the temporarily occupied territories only with a Russian citizen's passport



At the beginning of 2024, regulatory and legal acts were adopted in the temporarily occupied territories that “legalized” the procedure for confiscating residential apartments belonging to Ukrainian citizens who left the occupied territories as a result of the armed aggression of the RF.



**List of regulatory legal acts that "legalized" the procedure for confiscating residential apartments:**

- Law of the People's Council of IAF DPR No. 66-RZ of March 21, 2024 "On the specifics of identifying, using, and recognizing the right of municipal ownership of municipal entities of the Donetsk People's Republic to residential premises that have signs of ownerless property located on the territory of the Donetsk People's Republic";
- Law of the People's Council of IAF LPR No. 52-I of March 27, 2024 "On the specifics of identifying, using, and recognizing the right of municipal ownership of municipal entities of the Luhansk People's Republic to residential premises that have signs of ownerless property located on the territory of the Luhansk People's Republic";
- Law of the Legislative Assembly of Zaporizhzhia Oblast No. 29 of May 20, 2024 "On the specifics of regulating property rights in relation to real estate objects in the form of residential premises that have characteristics of ownerless property located on the territory of Zaporizhzhia Oblast";
- Resolution of the Government of the Kherson Oblast No. 25-pp of March 22, 2024 "On approval of the Procedure for identifying and using residential premises that have signs of ownerless property in the territory of the Kherson Oblast."

Houses and apartments confiscated in the occupied territories were provided on a priority basis to representatives of the RF's law enforcement agencies in the occupied territories. On June 28, 2024, the occupation legislative body of IAF LPR adopted Law #77 dated June 28, 2024 "On Amendments to Articles 7 and 8 of the Law of the Luhansk People's Republic 'On the peculiarities of identifying, using, and recognizing the right of municipal ownership of municipalities of the Luhansk people's republic to residential premises with signs of ownerless property, located on the territory of the Luhansk People's Republic'." In accordance with the adopted amendments, houses and apartments

confiscated from citizens of Ukraine "shall be provided on a priority basis for use by employees of the Ministry of Defense of the RF, the Ministry of Internal Affairs of the RF, the Federal Security Service of the RF, the Ministry of the RF for Civil Defense, Emergencies, and Elimination of Consequences of Natural Disasters, the Federal Service of the National Guard Troops of the RF, the Foreign Intelligence Service of the RF, the Federal Protective Service of the RF, the Federal Customs Service, the Ministry of Justice of the RF, the Federal Bailiff Service, the Federal Penitentiary Service, the State Courier Service of the RF, the Prosecutor's Office of the RF, and the Investigative Committee of the RF."



# Mechanism for confiscation of residential buildings, apartments, and rooms in the occupied territories

The adopted documents regulated the procedure for recognizing as "ownerless" and confiscating real estate belonging to citizens of

Ukraine forced to leave the occupied territories as a result of the armed aggression of the RF.



**The following criteria were established for recognizing as "ownerless" and confiscating residential buildings, apartments, and rooms in the occupied territories:**

- Failure to pay for housing and utilities for one year prior to the date of discovery of housing that shows signs of ownerless property.
- Lack of information on the registered right of ownership of residential premises in the Unified State Register of Real Estate.
- Failure to use residential premises, which, among other things, creates a threat to its safety (or to an apartment building if the premises are an apartment or a room in an apartment building), or to the safety of life and health of other persons (including the owners of other premises in an apartment building if the premises are an apartment or a room in an apartment building).

The authority to identify, register, and accept residential premises that have signs of "ownerless" property was assigned to the local occupation government bodies. Information about residential premises that have signs of "ownerless" could come from any individuals or legal entities in the occupied territories.

Within 10 calendar days from the date of discovery of a residential premises showing signs of being "ownerless", the occupation authorities were required to post on the official website of the local government body on the Internet, as well as in accessible places at the entrance to the residential premises, an announcement about the discovery of a residential premises showing signs

of being ownerless, and about the need for the personal appearance of a person who considers themselves its owner or has rights to it, within 30 calendar days from the date of posting such an announcement with the following documents:

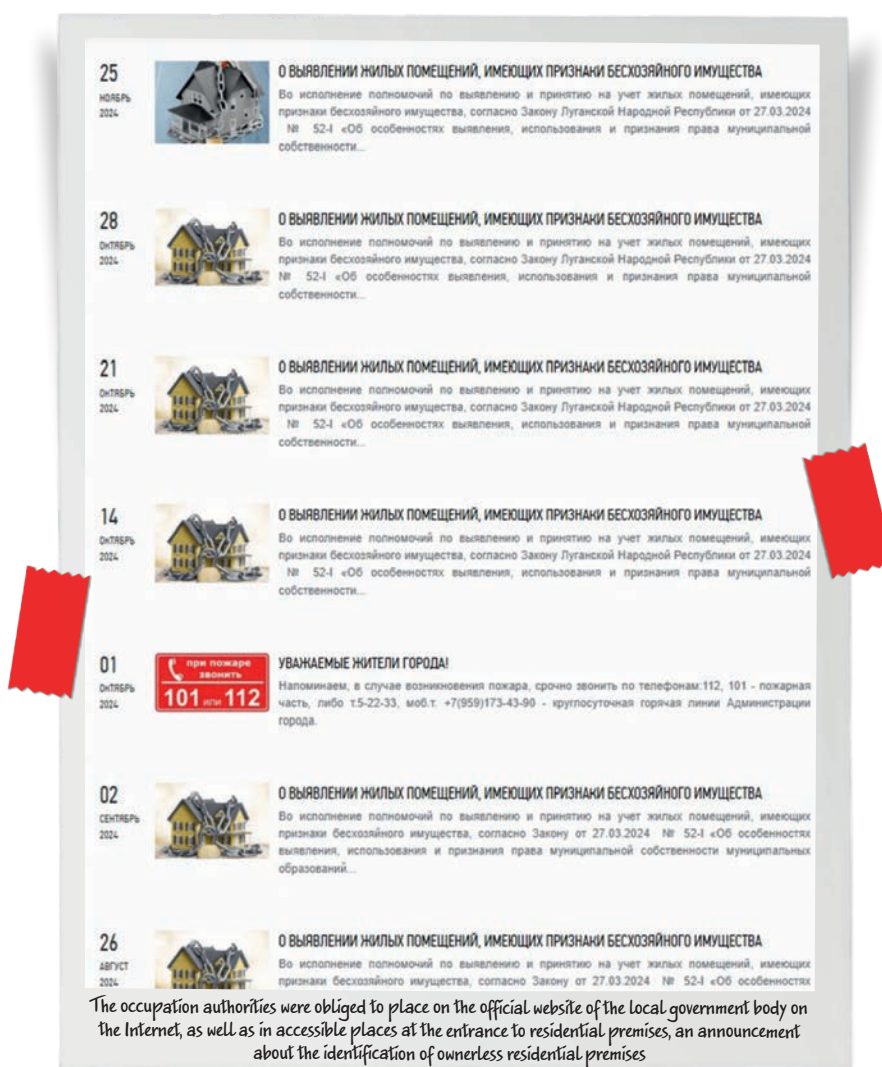
**a) A passport of a citizen of the RF or other identity document**

**b) Title documents for residential premises.**

The introduced rule on the presence of a Russian citizen's passport to confirm ownership of residential premises limited the rights of local residents living in the occupied territories who refused to receive Russian citizenship and served as an additional incentive for forced passportization.

In the absence of the owner of the housing, local government bodies in the occupied territories send information about the ownerless residential premises to the collegial bodies for the management and disposal of property objects. Collegial bodies for the

management and disposal of property objects were created in all occupied territories and were obliged to coordinate their decisions related to the transfer of ownership rights to all property objects in the occupied territories exclusively with the PPK "FRT".



In the absence of the owner of residential buildings, apartments, and rooms, the collegial body for the management and disposal of property objects applies to the Rosreestr bodies to register the identified property as ownerless and determines the persons to whom the ownerless residential premises will be transferred for their proper maintenance, including maintaining their operational properties. After three months from the date of registration of the

residential premises as “ownerless” by Rosreestr, the authorized local government body applies to the court with a statement on recognition of the municipal property rights of the municipality to the given residential premises in the manner prescribed by the legislation of the RF.

The right of municipal ownership of an “unclaimed” residential property arises after a court decision and is subject to state registration.

## Abuses by representatives of occupation administrations against owners of residential buildings, apartments, and rooms belonging to citizens of Ukraine

After the start of the confiscation of real estate (apartments and houses) belonging to citizens of Ukraine in the occupied territories, the number of abuses by representatives of the occupation administrations related to the procedure for confiscating real estate has sharply increased.

In August 2023, the Federal Notary Chamber of the RF reported that "the number of attempts at fraudulent actions with housing has increased significantly in the territory of the new regions." The Federal Notary Chamber stated that most requests

in the occupied territories are related to 'certifying the authenticity of the translator's signature and certifying real estate transactions, which ensures security guarantees and minimizes the risks of challenging transactions and acts in the future. This is fundamentally important, given that attempts at fraudulent actions with housing are currently being recorded locally'. As of August 1, 2023, notaries in the temporarily occupied territories have entered 131.9 thousand records into the Unified Information System of the Notaries of the RF.



In June 2024, a group of people was detained in the occupied Donetsk Oblast for fraud in the real estate sector belonging to Ukrainian citizens, amounting to tens of millions of rubles.



In June 2024, a group of people were arrested in the occupied Donetsk Oblast for real estate fraud amounting to tens of millions of rubles. The fraud was carried out with property that belonged to Ukrainian citizens forced to leave the occupied Oblast.

Employees of the Department of Economic Security and Anti-Corruption of the Ministry of Internal Affairs of the RF in occupied Mariupol "stopped the criminal activity of a group of individuals who produced and used fictitious documents of ownership of premises and apartments of the Ukrainian model, with the help of which they carried out transactions for the purchase and sale of real estate owned by individuals who left the RF in the period from 2022. During the operational activities, law enforcement officers identified a number of employees of one

of the city real estate agencies who were also involved in the illegal transactions."

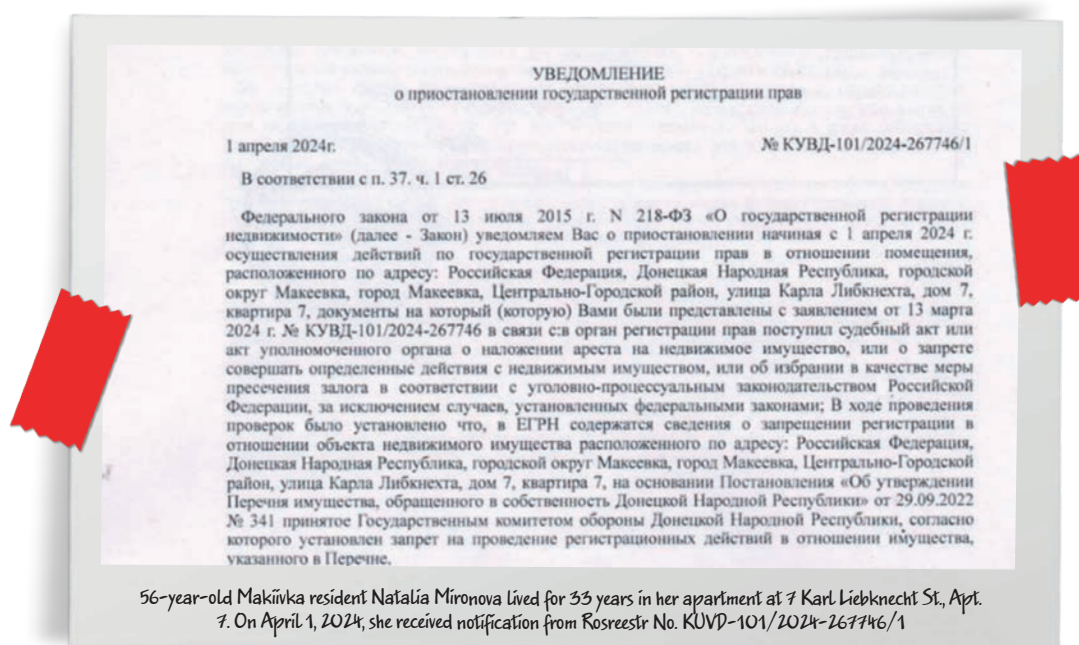
The Rosgvardia and the Ministry of Internal Affairs of the RF conducted searches at workplaces and residences, where they "discovered blank document forms, notarized powers of attorney, a Ukrainian notary seal, blank forms of certificates of the "Department of Technical Inventory, Accounting, and Valuation of Real Estate," a seal of the Mariupol MFC department and a device for their production, as well as a number of other related documents."

Based on this fact, the investigative unit for the investigation of crimes and organized criminal activity of the Main Investigative Directorate of the Ministry of Internal Affairs of the RF opened a criminal case on the grounds of a crime under Part 4 of Article 159 of the Criminal Code of the RF (Fraud committed by an organized group or on an especially large scale or resulting in the deprivation of a citizen's right to residential premises).

In 2024, two mass scandals occurred in the occupied territories related to the abuse of power by officials of the occupation administrations during the confiscation of residential buildings and apartments in the occupied territories. The consequences of the scandals became public, followed by statements that "the situation with apartments for which the registration of citizens'

property rights was suspended would be resolved."

In early 2024, residents of occupied Donetsk began to protest en masse due to the deprivation of their property rights to residential buildings, apartments, and rooms. When applying to Rosreestr offices with applications for real estate registration, local residents were massively refused to receive documents due to "the seizure of real estate, or the prohibition of performing certain actions with real estate... based on the Resolution 'On approval of the List of property transferred to the ownership of the Donetsk People's Republic' dated September 29, 2022, No. 341 adopted by the 'Main Defense Committee of the Donetsk People's Republic', according to which a ban was established on registration actions in relation to the property specified in the list."



In particular, there were cases when elderly residents of Donetsk were deprived of their property. For example, a resident of Makiivka, 56-year-old Natalia Mironova lived for 33 years in her apartment at 7 Karl Liebknecht St., apt. 7. On April 1, 2024, she received notification from Rosreestr No. KUVД-101/2024-267746/1 on the suspension of state registration of rights.

As a reason, the agency indicates the resolution of the Main Defense Committee of IAF DPR No. 341 of September 29, 2022, signed by the

"Head of IAF DPR" Denis Pushilin, to which a list of addresses of real estate was attached in relation to which no actions can be taken. She had no debts for utilities.

By the resolution adopted by the Main Defense Committee No. 341 of September 29, 2022, the residential apartments and houses of approximately 300 thousand residents living in the occupied Donetsk Oblast were seized and prohibited from performing certain actions. The adopted resolution was not published.





Forced to respond to mass protests by local residents deprived of their homes and apartments, the head of the occupation administration of IAF DPR in July 2024, stated that "A technical problem occurred when adopting the resolution of the Main Defense Committee No. 341." On June 21, 2024, the head of the occupation administration signed decree No. 307, according to which "the situation with apartments for which the registration of citizens' property rights was suspended will be resolved, a procedure for action will be developed, and the authorized body will grant the necessary powers."

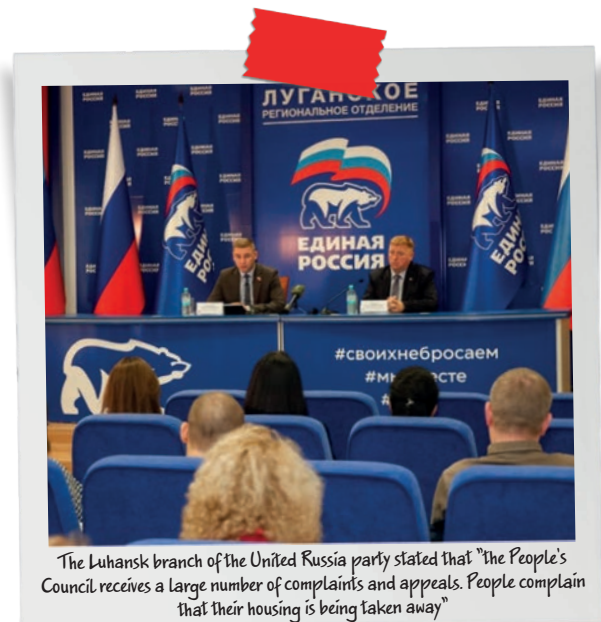
An equally large-scale scandal related to the confiscation of residential buildings and apartments broke out in the occupied territory of Luhansk Oblast. Residents living in the occupied territory began "massively complaining to State Duma deputies and senators of the Federation Council that their housing is being taken away."

The Luhansk branch of the United Russia party was forced to respond to the current situation, where they stated that "a large number of complaints and appeals are being received by the People's Council. People are complaining that their housing is being taken away."

On November 22, in occupied Luhansk, at the initiative of the United Russia faction, a working meeting was held with representatives of the occupying municipal entities, dedicated to issues related to the application of the provisions of IAF LPR's law "On the specifics of identifying, using, and recognizing the right of municipal ownership of municipal entities of the Luhansk People's Republic to residential premises that have signs of ownerless property, located on the territory of the Luhansk People's Republic."

The event was chaired by the Chairman of the Committee of the People's Council of IAF LPR

on Budget, Taxes, and Property Alexey Beletsky and the Chairman of the Committee of the People's Council of IAF LPR on Agrarian Policy, Nature Management, and Land Relations Vasily Leonov. Opening the meeting, Alexey Beletsky emphasized that "the reason for the meeting was the incorrect application of the provisions of the law by municipalities."



"Residents have many questions. The People's Council and deputies receive a large number of complaints and appeals. They have also already begun to arrive to the State Duma deputies and senators of the Federation Council. People complain that their housing is being taken away. Although, when we adopted this law, we said that there would be no arbitrariness. But it seems that many simply do not understand, or interpret its provisions incorrectly. And unpleasant situations arise," **Beletsky said.**





# Interviews

## on individual cases of property confiscation



**The main function of searching for property that can be confiscated is assigned to the local occupation authorities. In this case, the occupation authorities name several requirements for "defining apartments as ownerless", in particular:**

- failure to pay for housing and communal services and the presence of debt for more than a year
- lack of registration of these objects in the unified Russian register of real estate objects
- when housing "poses a threat" or a danger to others in terms of flooding.

For example, in IAF DPR, real estate was unilaterally seized in favor of the occupants, and the owners of this real estate were forcibly deprived of their rights to housing without trial or investigation, without warning, or explanation from local authorities.

First, the local occupation authorities must carry out the process of "identifying" so-called "ownerless apartments", then "notifying" directly at the property itself, and the "final" moment is preparing a statement of claim and sending it to court with the aim of "recognizing the apartment as ownerless and turning it into municipal property".

However, in reality, the opposite is happening—real estate is taken away, and then the owners are forced to prove that the property belongs to them. This is what is happening, for example, in occupied Melitopol, where the occupants identify real estate whose owners have left the city, and then demand that the owners prove that the property belongs to them, and re-register it according to Russian law. Moreover, in the documents, the Russians indicate that from 2028, only citizens of the RF have the right to stop the procedure for recognizing property as ownerless.

Property owners who fail to undergo mandatory inventory of their properties will face serious consequences. First of all, their housing will be recognized as "ownerless" and published on the official website of the city. This means that local authorities will begin the process of registering such properties in Rosreestr as ownerless. This process will take no more than three months.

After registration is completed, during the next three-month period, such objects will be transferred to municipal ownership. In the future, the occupants will distribute the real estate among workers or put it up for sale through preferential mortgages. According to data from the occupation authorities, about 1 thousand preferential mortgages will be issued to Russians in the occupied part of Ukraine by the end of 2024. Such a preferential mortgage program issues loans at 2%, valid until 2030. For comparison, at the moment, regular mortgage rates in Russia are 26-28%. Thus, the occupation authorities encourage the relocation of Russians from different regions of the RF to the occupied part of Ukraine.

At the same time, the occupation authorities create various obstacles to prevent people from re-registering their housing under Russian law and, thus, from getting the status of "ownerless". In particular, we are talking about the fact that residents submit documents to the Multifunctional Center (MFC) but their documents are not reviewed. Then their

apartments appear on the lists of "ownerless", after which the residents again submit data to the so-called Rosreestr and, again, there is a refusal. At the same time, local residents note that even an appeal to the "prosecutors" does not produce any effect—the housing is still considered "ownerless" and the residents are threatened with eviction.

## Nadezhda, 38 years old, resident of Melitopol

It all started with the fact that in Melitopol, working groups were formed that inspected various houses and found the owners. In essence, this is an attempt to appropriate someone else's property by the occupants, citing the "absence of owners".

I left the city last year. But in order to do so, I had to get a Russian passport. So I left through Crimea and then through Georgia to Europe. When my neighbors told me that my apartment was on the list for confiscation, I thought that I needed to go back and sell this apartment. I returned to the occupied part of the Zaporizhzhia Oblast through Moscow, I had to go through seven circles of hell at Sheremetyevo Airport, where I was "filtered". But, thank God, they let me through.

However, when I got to occupied Melitopol, it turned out that the occupation authorities were inventing more and more restrictions to prevent citizens from keeping their property. For example, Rosreestr refuses to accept powers of attorney for the right to dispose of property issued in the European Russian consulate in order to take away as much real estate as possible.

In my case, it was a little different—when I visited the Multifunctional Center, where permits are issued, I was denied registration of housing because only one owner showed up. That is, in order to register housing according to Russian laws, all its owners must come to the MFC in person, which is often impossible. In my case, also

because my husband cannot come to the occupied part of the Zaporizhzhia Oblast because he is connected with the Ukrainian Security Forces, he could certainly be seized and sent to the "basement". So I had to return to Europe, and I don't know what will happen to the apartment now.

1. Запорожская область, г. Мелитополь, ул. Дарьи Дуговой, 35, кв. 107;
2. Запорожская область, г. Мелитополь, ул. Дарьи Дуговой, 35, кв. 35;
3. Запорожская область, г. Мелитополь, ул. Дарьи Дуговой, 37, кв. 26;
4. Запорожская область, г. Мелитополь, ул. Дарьи Дуговой, 39, кв. 21;
5. Запорожская область, г. Мелитополь, ул. Университетская, 84, кв. 61;
6. Запорожская область, г. Мелитополь, ул. Гвардейская, 27, кв. 1;
7. Запорожская область, г. Мелитополь, ул. Гвардейская, 27, кв. 5;
8. Запорожская область, г. Мелитополь, ул. Гвардейская, 21, кв. 59;
9. Запорожская область, г. Мелитополь, ул. Гвардейская, 21, кв. 63;
10. Запорожская область, г. Мелитополь, ул. Крупской, 16, кв. 96;
11. Запорожская область, г. Мелитополь, просп. 50-летия Победы, 22Б, кв. 34;
12. Запорожская область, г. Мелитополь, просп. 50-летия Победы, 42, кв. 18;
13. Запорожская область, г. Мелитополь, просп. 50-летия Победы, 36/9, кв. 11;
14. Запорожская область, г. Мелитополь, просп. 50-летия Победы, 38, кв. 4;
15. Запорожская область, г. Мелитополь, просп. 50-летия Победы, 38, кв. 16;
16. Запорожская область, г. Мелитополь, просп. 50-летия Победы, 38, кв. 23;
17. Запорожская область, г. Мелитополь, просп. 50-летия Победы, 38, кв. 49;
18. Запорожская область, г. Мелитополь, просп. 50-летия Победы, 38, кв. 50;
19. Запорожская область, г. Мелитополь, просп. 50-летия Победы, 40, кв. 55;
20. Запорожская область, г. Мелитополь, ул. Ивана Алексеева, 14, кв. 26;
21. Запорожская область, г. Мелитополь, ул. Гоголя, 142, кв. 3;
22. Запорожская область, г. Мелитополь, ул. Кирова, 39, кв. 19;
23. Запорожская область, г. Мелитополь, переулок Садовый, 9А, кв. 57;
24. Запорожская область, г. Мелитополь, ул. Ярослава Мудрого, 6, кв. 22Б
25. Запорожская область, г. Мелитополь, ул. Леси Украинки, 5/2;
26. Запорожская область, г. Мелитополь, ул. Дружбы, 199, кв. 98;
27. Запорожская область, г. Мелитополь, ул. Дружбы, 199, кв. 99;
28. Запорожская область, г. Мелитополь, ул. Дружбы, 132А;
29. Запорожская область, г. Мелитополь, ул. Дружбы, 167/1;
30. Запорожская область, г. Мелитополь, ул. Дружбы, 167/2;
31. Запорожская область, г. Мелитополь, ул. Дружбы, 99/7;
32. Запорожская область, г. Мелитополь, ул. Дружбы, 128;
33. Запорожская область, г. Мелитополь, ул. Запорожская, 195Б;
34. Запорожская область, г. Мелитополь, ул. Запорожская, 162;
35. Запорожская область, г. Мелитополь, ул. 1-я Агостроевская, 25;
36. Запорожская область, г. Мелитополь, ул. 2-я Агостроевская, 14;
37. Запорожская область, г. Мелитополь, ул. Геническая, 5;
38. Запорожская область, г. Мелитополь, ул. Панаса Мирного, 7;
39. Запорожская область, г. Мелитополь, 2-й переулок Куйбышева, 33;
40. Запорожская область, г. Мелитополь, ул. Агретная, 22;
41. Запорожская область, г. Мелитополь, 1-й переулок Малиги, 71;
42. Запорожская область, г. Мелитополь, 1-й переулок Малиги, 49;
43. Запорожская область, г. Мелитополь, ул. Гоголя, 5/1;
44. Запорожская область, г. Мелитополь, ул. Чкалова, 152/1;
45. Запорожская область, г. Мелитополь, ул. Героев Крут, 69
46. Запорожская область, г. Мелитополь, ул. Толбухина, 49;

List of apartments to be confiscated  
occupied Melitopol

## Olga, 57 years old, resident of Melitopol

It Last year, I was arrested for refusing to cooperate with the occupants. It happened in one day because I worked in the administration under Ukraine but after the occupation, I did not go to work. I was offered a job—the Russian authorities notified me of this. I did not agree, so I was arrested and thrown into the "basement", where I spent three days. After three days of detention, they presented some kind of "deportation decision" and forcibly took me out of Melitopol. I was helped. I am now in a European country, in a hostel, thanks to the help

of Ukrainian and international volunteer organizations.

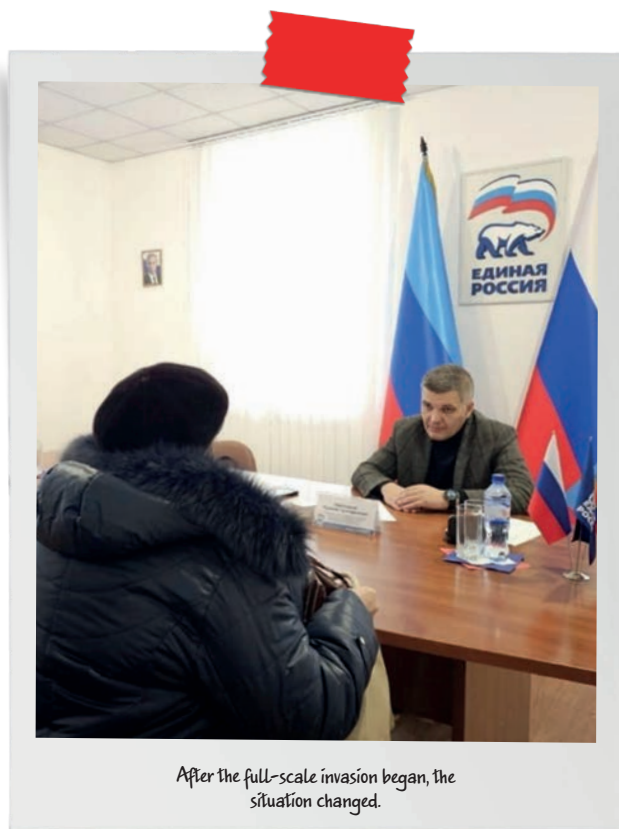
A little later, a Russian citizen with two children has moved into my Melitopol apartment. I don't understand how to get the apartment back now because I can't go back to the occupied part of Ukraine, and my children, registered in the apartment, are in the territory controlled by Kyiv. Of course, they can't go there either. Only citizens of Russia can enter property into the Register, and neither I nor my children are Russian citizens.



At the same time, as I learned, representatives of the occupation authorities came and said that the "unreliable" people would be deprived of everything: if not an apartment as a whole, then, at least, the square meters that they once occupied.

## Larisa, 47 years old, resident of Donetsk

Our departure from Donetsk in 2014 was forced and hasty. The decision to leave our hometown was not easy but the safety of the family became a priority. The apartment remained, and at first, we tried to manage it remotely. Renting it out was not easy—the situation in the region was constantly changing, and finding reliable tenants who would pay for housing on time was certainly a challenge. As a result, for several years, until about 2021, we paid for utilities ourselves. We mainly relied on the help of friends who periodically transferred money to the local housing office. I also took trips to Donetsk about once a year. These trips were intense and required careful planning, given the difficult political and transport situation. Each trip turned into a marathon: quickly paying all the accumulated bills for the apartment (rent, heating, hot and cold water, garbage removal, etc.), quickly inspecting the condition of the apartment and immediately returning. I collected and stored all receipts and payment documents.



After the full-scale invasion began, the situation changed.





Residents of occupied Mariupol, left without apartments, recorded video messages to the President of the Russian Federation on May 26, 2024. The messages were recorded by residents of the left bank: the Stadium area (Azovstalskaya, Lomizova, Komsomolsky Boulevard, 50 Years of October streets) and the Victory Square area.

But after the full-scale invasion began, the situation changed. Now no one is going to go there. We can't even transfer money to pay off the debt for utilities. There is no gas in our apartment, which makes the situation even more absurd. We saved money for this apartment for a long time, and it was not an easy path. We lived in a hostel, where the conditions were far from ideal: constant noise, no personal space and basic comfort. Every day we dreamed of our own corner where we could relax and feel safe.

But now it has ended up on the so-called "confiscation lists". The situation we are in is simply shocking. Now it turns out that we have accumulated huge debts to the occupation administration, and as a result of this, our apartment is going to be "nationalized". The apartment is registered in the name of my husband, but visiting occupied Donetsk is very dangerous because he can be mobilized, sent to the front or thrown into a "basement", as often happens with pro-Ukrainian citizens.

## Alexander, 41 years old, resident of Luhansk

I left Luhansk a long time ago but my mother remained in the city. She lived in the apartment where I was registered but did not return after the occupation in 2014. This year, my mother died, and I, as the only son, was supposed to inherit the apartment. However, then systematic checks of apartments whose owners were absent began. The occupation authorities, using incomplete and often distorted data from the real estate registry, identified apartments of deceased people, where the property documents were not re-registered in accordance with the "norms" of Russian legislation. The "re-registration" procedure in practice means appropriation of property.



One day the representatives of the occupation administration and persons associated with them simply broke down the door and entered to carry out a "property assessment"

And this happened simply: one day they simply broke down the door. The representatives of the occupation administration and persons associated with them entered and out an "assessment of property" for subsequent inclusion in the

so-called "maneuverable housing stock". In essence, this is legalized robbery, aimed at confiscating housing from everyone who did not have time or was not able to re-register property in accordance with Russian laws.



Having learned about what was happening, I managed to ask my neighbors to take out my mother's belongings and documents in order to preserve her memory but through the same neighbors, a message came that the apartment would be handed over either to Russian soldiers or to local collaborators who had become part of the "new elite" of the occupied city.

## Anastasia, 44 years old, resident of Lysychansk

I had to leave Luhansk after 2014 and settle in Lysychansk because my work remained tied to the Luhansk Oblast. After the full-scale invasion, I, of course, had to leave Lysychansk and my apartment, which I had previously bought and done a good renovation there.

Last month, information appeared about lists of apartments subject to recognition as

"ownerless" but my apartment was not there. Losing housing for the second time, after everything that has been experienced by me, would be an emotional blow. Material losses are only one side of the coin. Losing a home is losing a part of one's own history, memory, a sense of stability, and security. And it is also the loss of the feeling that I can one day return to Lysychansk.



My former neighbor, who cooperated with the occupation authorities, reported to the Russians that my apartment was empty



The events then developed as follows: my former neighbor, who had cooperated with the occupation authorities, reported to the Russians that my apartment was empty.



After that, a notice appeared on my door, demanding the immediate appearance of the owners to verify the ownership rights. It is interesting that later I was told how the neighbor, who justified her actions, stated that she knew about my pro-Ukrainian sentiments.

From this, I conclude that the occupants first of all take the apartments of those whom they consider enemies. Russian aggression destroys not only infrastructure but also the lives of millions of people.



I believe that such cases systematically violate human rights, and the international community must take all necessary measures to bring the perpetrators to justice and protect the rights of Ukrainian citizens!

## Victoria, 40 years old, Severodonetsk

We lived in a multi-story building in our apartment. We bought it a year and a half before the start of the full-scale war, did a good renovation there. For a long time, I worked as a correspondent for one of the central TV channels in the Luhansk Oblast, and my husband is a military man. On February 24, 2022, my son and I left Severodonetsk while the city was not occupied yet. I had to ask friends to look at what was happening with our house while there was such an opportunity. Then my friends asked to live in the apartment there, although the fighting was still going on near the city. Those friends were left without housing because their house was completely destroyed. Then I asked to collect our belongings, by which one can understand what we were doing—military uniforms, my journalistic certificates—and hide them in the basement. That family did so but when the front was already very close, in fact, the fighting began in the city, the family moved out of our apartment. And after the city was completely captured by the Russians, I was not

able to find out what the situation was with real estate.

But then a service appeared, which was provided by locals who remained to live under the occupants—they checked what was happening with the apartment for money and passed the data to the owners. Then we asked to find out about the condition of our apartment (we ordered such a service). It turns out that in each house, there is a so-called "overseer" of the apartments, who collects all the information and passes it on to the occupants. He was the one who reported that Russian officers were living in the apartment, who were just waiting for the owners of the apartment to return so they could seize them. It is interesting that they essentially took the apartment away but did not go through any procedure because it was not on the list for confiscation. I can assume that one of the Russian officers will simply register it in their name because nothing is stopping them—they will simply enter the data into the register and no one will say anything against it.



While the occupation is going on, I can't go to check on my apartment and claim my rights. I've already cried my eyes out from the realization of my loss and I'm just trying not to think about it now.

# Use of confiscated property

At the moment, confiscation processes are taking place in various parts of occupied Ukraine. They are often led by visiting Russians, whom the occupation authorities have placed at the head of relevant departments. For example, in the occupied part of the Kherson Oblast, the redistribution of property is managed by the "Ministry of Property and Land Relations of the Kherson Oblast", and, in particular, the so-called "minister" of this ministry, Elena Pekova, and the first deputy of the "minister" Diana Savarovskaya. Representatives of the occupation authorities are actively engaged in the seizure of real estate, choosing the most attractive and comfortable properties for their placement. They enter residential premises where people are already living and forcibly evict them, ignoring their rights and legitimate interests. This process is often accompanied by intimidation and threats, which makes it especially traumatic for local residents who find themselves in a difficult situation.

Thus, starting in April 2024, Russian occupants have been publishing lists of residential premises that they threaten to take away from their owners if they do not provide them with title deeds. For example, the occupants refer to the resolution of the so-called "government" of the occupied Kherson Oblast No. 25-pp of March 22, 2024 "On approval of the

procedure and use of residential premises that have signs of ownerless property." It sets out the mechanism for the illegal appropriation of property by the occupation administration of the RF.

At the same time, as was said above, in the Kherson Oblast, the confiscation process is led by citizens of the RF. In particular, Russian citizen Elena Yuryevna Pekova, a citizen of the RF, received a tax number in the Chulimsky district of the Novosibirsk Oblast. Since 2021, she has been practicing law in Sevastopol. There is information about 23 court cases in which she participated. Most of them concerned housing and land law.



In June 2022, Pekova registered as an individual entrepreneur in occupied Sevastopol. The main activity is the sale of drinks in specialized stores. Among others are the sale of tobacco and various products, and the operation of restaurants. But a year later, the activity was terminated—a month before her appointment as "Minister" in the "Ministry of Property and Land Relations of the Kherson Oblast".

Pekova's deputy, a Russian citizen Diana Yuryevna Savarovskaya, has experience in dealing with property and large sums of money in housing construction. She came from the capital of the Khanty-Mansiysk Autonomous Okrug, Yugra (KhMAO) of the RF, where she had been engaged in business for a long time (trade and clothing production), and since 2012, she has worked as

Deputy Director of the Housing Policy Department of the Khanty-Mansiysk Autonomous Okrug (later—construction).

In this position, Savarovskaya operated multi-million dollar housing construction programs, which were accompanied by scandals and mass lawsuits from residents of Yugra who were removed from preferential mortgage programs.



Pekova's deputy, Russian citizen Diana Yuryevna Savarovskaya, has experience in dealing with property and large sums of money in housing construction.



In a similar way, the distribution of property occurs through the "specialized" ministries in the occupied part. Thus, in the occupied Zaporizhzhia Oblast, the "Ministry of Property and Land Relations" since September 2024 is headed by "Minister" Anton Olegovich Prokofiev, TIN 910227757621, registered in Crimea.



In the occupied Luhansk Oblast, the process of redistribution of property is being handled by Russian citizen Alena Aleksandrovna Antonova, the Minister of Property and Land Relations of IAF LPR

In the occupied Luhansk Oblast, the process of redistribution of property is being handled by Russian citizen Alena Aleksandrovna Antonova, Minister of Property and Land Relations of IAF LPR, TIN 345916885940, the region of registration is Volgograd Oblast.

In the occupied Donetsk Oblast, the distribution of property is handled by the State Property Fund of IAF DPR, headed by Sergei Kaida.



**The heads of the Rosreestr branches in the occupied parts of Ukraine are also actively participating in the redistribution:**

- Head of the Rosreestr Department in IAF LPR Denis Gedzeruk.
- Head of the Rosreestr Department in the Kherson Oblast Vasily Romanov.
- Head of the Rosreestr Department in the Zaporizhzhia Oblast Dmitry Trukhin.
- Head of the Rosreestr Department in IAF DPR Yuri Sirovatko.

Thus, the property in the occupied parts is managed by Russian officials who distribute the “confiscated” property—both residential real estate and commercial real estate and various objects at enterprises.

There are many examples of how the property is being confiscated with the help of representatives of the occupation administration both in the “ministries” and locally. In particular, Russian occupants in Kakhovka in the Kherson

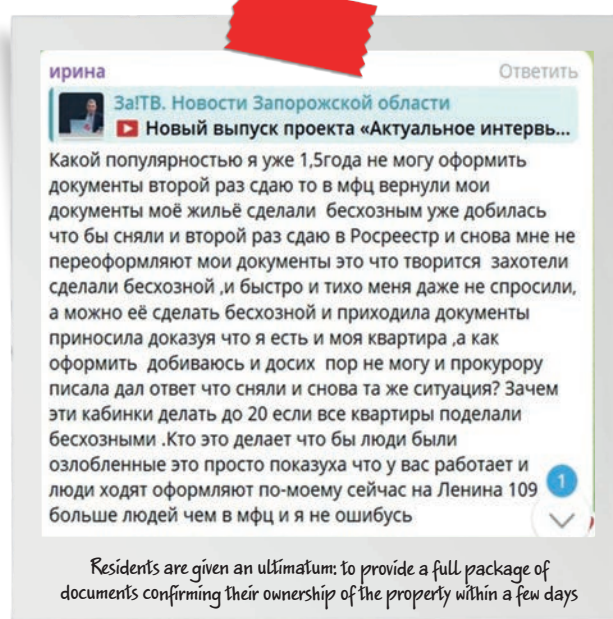
Oblast began to confiscate housing from those who were forced to leave the occupation. The person responsible for this was the 47-year-old collaborator Oleksandr Nagai, who works as the “Head of the economic department of the occupation administration of Kakhovka.” He never hid his pro-Russian sentiments and in 2013-2014, he was a participant in the “Antimaidan” in Kyiv.



Nagai has organized raids on multi-story buildings, essentially carrying out illegal raids on apartments. Their goal was to establish who lives in the buildings and who does not. At the same time, they did not limit themselves to a simple visual inspection. There are reports of cases of breaking into apartments under various pretexts, as well as demands to provide keys for a “technical inspection.”

The occupants' methods are quite cynical. If the apartment looks habitable (there are traces of the presence of residents, fresh traces of cleaning, working electrical appliances, or there are simply signs of a recent visit), the residents are given an ultimatum: to provide a full package of documents confirming the right of ownership of the housing within a few days.

This package of documents may include not only a certificate of ownership but also extracts from the house register, sales contracts, inheritance documents and others, depending on the situation. At the same time, the requirements are not limited to formal aspects. The occupants often demand additional information, such as confirmation of payment for utilities, even if the bills are not issued according to Russian standards and cannot be presented.





At the same time, as an incentive, collaborators receive so-called "housing certificates" for housing in the Krasnodar Krai of the RF.

At the moment, the occupants are actively taking away not only apartments but also other real estate, which they call "ownerless". In particular, in the occupied Donetsk Oblast, the "DPR State Property Fund" reports that property is being confiscated on a significant scale.

For example, in October and November 2024, the State Property Fund of IAF DPR reported on the discovery of an "ownerless" real estate property: an unfinished construction project, with an area of 750 sq. m, located at the address: Donetsk, Kuibyshev raion, 48.009074, 37.784046 (near Dubravna Street).

This Fund also reported on the discovery of an "ownerless" real estate property as of November 02, 2024: a building with an area of 2,686.7 sq.m., located at the address: RF, Donetsk

People's Republic, Donetsk, 2K Horlivka St., adjacent to the finished goods warehouse building.



### Other examples of "ownerless" property are:

- As of October 14, 2024, the building of the former car dealership "Motors", located at the address: RF, DPR, Donetsk urban district, Donetsk city, 50 Kyiv avenue;
- The store building with an area of 566.5 sq.m., located at the address: Mariupol raion, Mariupol city, 80a Mashinostroitel'naya St.
- As of October 03, 2024: the Metallurg sanatorium, located at the address: Mariupol urban district, the city of Mariupol, 17 Primorsky Boulevard, which consists of three buildings: building 1 with an area of 2,000 sq.m, building 2 with an area of 2,000 sq.m, and building 3 with an area of 700 sq.m;
- Recreation center "Priboy" with a total area of about 0.8 hectares, located at the address: Manhush municipal raion, village of Melekine, 26 Naberezhnaya Street;
- Recreation center "Mashinostroitel" with a total area of 8 hectares, located at the address: Manhush municipal raion, village of Melekine, 1 Pervaya Liniya St.;
- As of October 02, 2024: 1) Boarding house "Druzhba" with a total area of 3.7 hectares, located at the address: Novoazovsk-Moscow District, Sedove settlement, 10a Komsomolskaya St.; 2) Boarding house "Luch" with a total area of 1.4 hectares, located at the address: Novoazovsk-Moscow District, Sedove settlement, 62 Komsomolsk St.



Similarly, they identify "ownerless" property in other occupied Oblasts. For example, in the occupied part of the Zaporizhzhia Oblast, the following property falls under the status of "ownerless":

- Melitopol, 333/1 Lomonosov St.—Melitopol incubator;
- Melitopol, 83 Osipenko St.—one-story and two-story buildings, fenced area (used for religious ceremonies);
- Melitopol, 14 B. Khmelnitsky Avenue, "Varenichok" store;
- Melitopol, 30 B. Khmelnitsky Avenue, "Svet" store;
- Melitopol, 7a Gagarin street, "Stroitel" store;
- Melitopol, 3 Gagarin street, Kolos store;
- Melitopol, 28/1 Grizo-Dubovoy St., "Tile" store;
- Melitopol, 28 50th Anniversary of Victory Avenue, "Elos" beauty salon;
- Melitopol, 3 Gagarin street, "Old Mill" cafe;
- Melitopol, Kyrylivka urban settlement, 65 Kurortna St., Guest house "Azalia";
- Melitopol, Kyrylivka village, 7 Stepna St., Guest house "Mayak";
- Melitopol, Kyrylivka urban settlement, 73 Shevchenko St., "Three Fat Men" Retirement House.



## Examples of transferred property in the occupied territories

At this stage, data is being collected on the so-called "ownerless property" but there are already facts of its transfer to other owners, as well as data on how they can be used. For example, in the occupied Luhansk Oblast, security forces can have priority in applying for "ownerless housing". The corresponding "law" was adopted by the deputies of the "LPR's People's Council" in June 2024, in particular, the norms "On Amendments to Articles 7 and 8 of the Law of the Luhansk People's Republic 'On the peculiarities of identifying, using, and recognizing

the right of municipal ownership of municipalities of the Luhansk people's republic to residential premises with signs of ownerless property, located on the territory of the Luhansk People's Republic" were adopted.

As of autumn 2024, it is already planned to transfer more than 40 residential apartments in Luhansk, which were taken from their legal owners, to Russian military personnel. Meanwhile, in the occupied Luhansk Oblast, 514 residential premises have already been "nationalized", that is, taken away.



*The head of the electoral commission from the Russian Volgograd, Oleg Ryabchuk, was appointed the Head the housing inspection in the occupied Zaporizhzhia Oblast*

The so-called "State Housing Inspectorate" has begun work in the occupied territory of Zaporizhzhia Oblast, the task of which is to "monitor the quality of services for the maintenance of apartment buildings." The Head of the housing inspectorate is the Chairman of the election commission from Russian Volgograd, Oleg Ryabchuk. For many years, Ryabchuk was involved in the distribution of funds allocated for the maintenance of city officials in the RF, as well as Russian municipal elections.

In November 2024, in the occupied Zaporizhzhia Oblast, namely, in Melitopol, the first apartments were already sold under the preferential mortgage system. The "owners" of the housing were visiting Russian security officials and judges, as well as doctors and teachers.

Thus, the "governor" of the occupied Zaporizhzhia Oblast, Yevgeny Balitsky, publicly admitted that he would hand over the confiscated apartments to visiting Russian specialists.



"The same applies to abandoned houses and apartments. We aren't going to linger with that issue. History will judge us whether we are right or not but we take these apartments and objects and hand them over to security forces, court employees, teachers, doctors, and so on—who come to us on a rotational basis. We have such a practice," **Balitsky said.**



In this case, as an example, we can cite a Russian military man from occupied Crimea who "bought" an apartment in the occupied Zaporizhzhia Oblast at a discount and moved his family there. In particular, we are talking about the family of a military man who bought an apartment in the village of Mirne (not far from

Melitopol) at a discount. The wife of this military man, an English teacher for students in grades 5-11, Antonina Sidorenko, also reported that in addition to the apartment in the village of Mirne, the Russian military man was also allowed to buy an apartment in Melitopol at a discount.



In order to distribute the seized property, IAF DPR prescribed a procedure with a so-called "auction", at which the objects will be put up for sale. The electronic platform for holding online auctions for the sale of such property is LLC "Systems of Safe Trading"—a subsidiary of PJSC "Promsvyazbank". The resolution entered into force and is valid until January 1, 2028.

For example, the occupation authorities in Melitopol declared an apartment building on 70 Belyaeva Street, which is in the final stage of construction, to be "ownerless". Despite the fact that most of the apartments were purchased by Ukrainian citizens back in 2020, the occupation authorities, led by the so-called "governor of the Zaporizhzhia Oblast" Yevgeny Balitsky, declared the building "ownerless" and are moving in new residents.

The occupants transferred the MiLiSa guest house in the village of Henicheska Hirka in the Henichesk raion to the IRAI traffic police unit of the occupation Ministry of Internal Affairs of the Kherson Oblast "on the right of free use."

The buildings of the Yolki recreation center (54 Naberezhnaya St.) and the Ilya Kulik children's health resort (57 Naberezhnaya St.) seized in the resort village of Henicheska Hirka were handed over by the Russians to the occupation military commandant's office.



In July 2023, Russians transferred real estate in Henichesk on 45 Monastyrskaya Street and in the village of Novotroitske, Henichesk district on 11 Suvorova St. to the illegal Main Bureau of Medical and Social Expertise for the Kherson Oblast.

The occupants transferred the real estate in Skadovsk at 10 Sergeevskaya St. to the Russian LLC CMRBank. This banking holding has experience working in Russian-occupied Abkhazia and Crimea. LLC CMRBank (TIN

7728547955) was registered in April 2015, legal address: Moscow, 10 Palikha St., Building 7. According to the RF's State Register, its founder is JSC Forward, whose founders and shareholders are not disclosed.

According to the register, CMRBank has only one branch—Rostovsk, in Rostov-on-Don, which has operational offices in Taganrog and Aksay, in Belgorod, as well as in the north of occupied Crimea in the cities of Dzhankoi and Krasnoperekopsk.



The occupants transferred the property complex of the mobile operator Vodafone (PJSC "VF Ukraine") in the Kherson Oblast to K-Telecom LLC, a Russian mobile communications company specifically created to service subscribers in Crimea after its illegal annexation in 2014. The Russian State Commission on Radio Frequencies illegally allocated its frequencies in occupied Crimea, on which the company MTS-Ukraine operated. K-Telecom LLC, created in May 2014, is 100% owned by Mobile TeleSystems OJSC. An identical name to K-Telecom exists in Russian registries—the company was registered in Krasnodar in 2014, and its activities are stated as “telephone communications”. This company is 100% owned by the Armenian CJSC Cell Group Worldwide Holding and is managed by Boris Borunov.

In November 2022, the occupants transferred the property complex of another Ukrainian mobile operator Lifecell (LLC Lifecell) in the Kherson Oblast to the so-called state enterprise of IAF DPR, the Republican Communications Operator. The latter is also known to residents of the occupied territories under the name Phoenix: it was to it that the Russians transferred the stolen capacities of the Ukrainian mobile operators Kyivstar and Lifecell in the Donetsk Oblast.

In Prymorsk, the Annunciation of the Blessed Virgin Mary Church of the UGCC and the chapel in the central park, as well as the Primorsky sanatorium of the Ministry of Defense of Ukraine and the Aurora recreation center, have been declared “ownerless.” Both facilities have been transferred to the Russian Ministry of Defense.

In Severodonetsk and surrounding settlements, Russians have already appropriated 300 houses and apartments. At the same time, the occupants are giving out the “confiscated”

housing to military and security forces from the RF who have arrived in the city, as well as to labor migrants.

The premises of the pharmacy chains of Avis-Pharm LLC were transferred to Renaissance Pharma LLC, registered in October 2021 in the city of Mytishchi, Moscow Oblast. According to the Russian state register, its director and founder is Igor Yuryevich Nelyubov. The Renaissance Pharma network in the Kherson Oblast included several pharmacies in Henichesk, Rykove, Hola Prystan, and Skadovsk.

The buildings and premises of the Kherson LLC Step Pharmacy System were transferred by the Russians to LLC Urm-Pharm. This enterprise was registered in occupied Donetsk in 2020. The director of Urm-Pharm is Ksenia Valerievna Malysh, and the founder is Liliya Leonidovna Mamaeva.

In occupied Brianka in the Luhansk Oblast, the occupants are distributing “nationalized” housing of local residents to doctors visiting from Russia.



# General consideration of the issue of confiscation

## as a tool for reducing the number of Ukrainians in the occupied territories

The Russian occupation policy in the temporarily captured territories of Ukraine is a complex system of measures aimed at suppressing resistance and establishing complete control. Its main components can be divided into several interconnected blocks, each of which plays an important role in achieving the final goal: the complete integration of the captured lands into Russia.

One of the tools for reducing the number of Ukrainian citizens in the occupied territories is the ban on entry into the occupied territories and the confiscation of property.

Thus, from 00:00 on October 16, 2023, the Federal Security Service of the RF restricted entry into the RF of Ukrainian citizens arriving in the RF from the territories of third countries

at checkpoints across the state border of the RF, with the exception of the multilateral air checkpoint across the state border of the RF—Moscow (Sheremetyevo Airport) and the automobile checkpoint across the state border of the RF Ludonka (Pskov Oblast).

Ukrainian citizens arriving at Sheremetyevo Airport are subject to fingerprinting and photographing, as well as filtration procedures that can last for several days—checking the contents of electronic means of communication for "nationalist content and contacts with law enforcement and armed forces of Ukraine", filling out a questionnaire and conducting an interview with employees of the Federal Security Service of the RF.



According to the Eastern Human Rights Group, the ban on entry into the occupied territories for Ukrainian citizens is also connected with the confiscation of residential buildings and apartments located in the occupied territories.

We draw attention to the fact that, starting from October 17, 2024, the Rosreestr offices in the occupied territories stopped accepting documents for real estate registration from foreign citizens and citizens of Ukraine. The Rosreestr offices in the temporarily occupied territories reported that "since October 17, the acceptance of documents for entering information into Rosreestr in the MFC departments for foreign citizens and citizens of Ukraine (stateless persons), including when submitting an application through a representative who has citizenship of the RF, is unacceptable."

In October 2024, the representative of the Russian Foreign Ministry in occupied Luhansk, Vladislav Deinego, stated that Russian special services allow only those Ukrainian citizens who

"are going to support Russia, and not to carry out subversive work" into the temporarily occupied territories.

Answering a question about the existing restrictions on entry into the RF for Ukrainian citizens who want to return to the occupied territories of Luhansk, Donetsk, Zaporizhzhia, and Kherson Oblasts, he said that the relevant Russian services are taking all necessary measures to prevent people **"who are not traveling with tasks to support Russia and are using all available means to exclude attempts by the West to**

**organize subversive work" from entering the RF. According to Deinego, the problems of returning home residents of the occupied territories are complicated only by logistics. "This is more about which residents may be restricted from entering after verification; it is more about logistics itself. Because it is now technically possible to enter the territory of the RF only by air,"** Deinego said.



According to the Ministry of Social Policy of Ukraine, as of November 29, 2024, 926,765 families from the Luhansk, Donetsk, Zaporizhzhia, and Kherson Oblasts, including those occupied after the large-scale Russian invasion in 2022, were registered as temporarily internally displaced persons (IDPs).

At the same time, not all citizens of Ukraine are registered as IDPs but only those whose settlements are located in the combat zone, as well as those occupied as a result of the full-scale aggression of the RF (data on the

number of families registered as IDPs from the Luhansk, Donetsk, Zaporizhzhia, and Kherson Oblasts, including those occupied after the large-scale invasion of the RF in 2022, are given in Table 1).

**Table 1. Data on the number of families registered as IDPs from the Luhansk, Donetsk, Zaporizhzhia, and Kherson Oblasts, including those occupied after the large-scale invasion of the RF in 2022**

Oblast	Number of IDPs registered with the Ministry of Social Policy of Ukraine as of November 29, 2024
Luhansk Oblast	245,589
Donetsk Oblast	468,079
Zaporizhzhia Oblast	176,669
Kherson Oblast	36,428
Total	926,765



It is worth noting that from the almost completely occupied territory of Luhansk Oblast, 245,589 families who owned at least one residential building or apartment in the occupied territory are registered as IDPs with the Ministry of Social Policy of Ukraine. Thus, in the occupied territory of Luhansk Oblast, there are at least 245,589 individual homes and apartments in residential buildings that belonged to local residents.

Based on the proposed method, it is possible to make an approximate estimate of the number of individual homes and apartments in residential buildings of Ukrainian citizens remaining in the occupied territories of Luhansk,

Donetsk, Zaporizhzhia, and Kherson Oblasts: there are **926,765 real estate objects belonging to Ukrainian citizens that are located in the occupied territories.**



The RF does not publish data on the number of deported Ukrainian citizens, in relation to whom a decision was made on the undesirability of their stay on the territory of the RF or on administrative expulsion from the RF through the air checkpoint of the state border in the RF—Moscow (Sheremetyevo Airport).

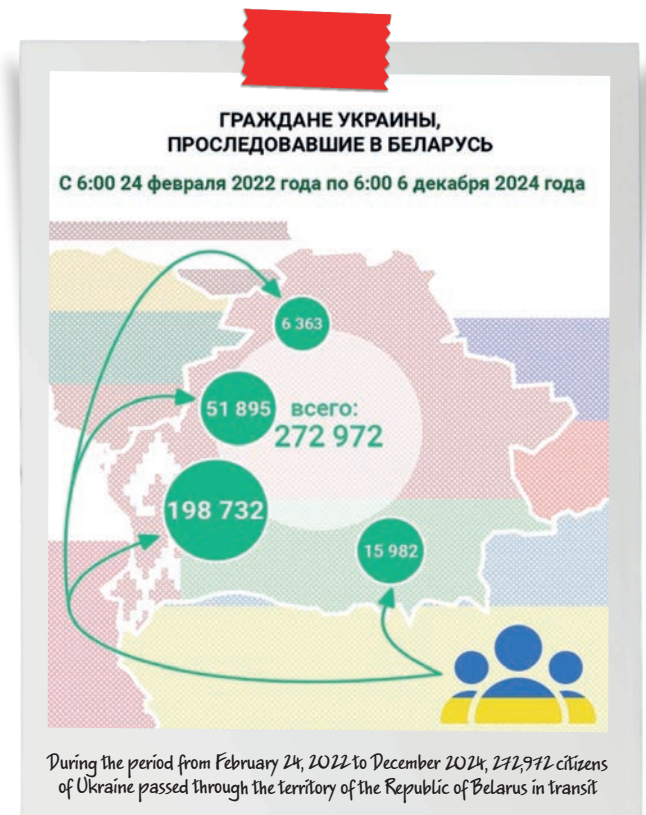
After the entry ban, Ukrainian citizens are trying to get to the occupied territories using flights through third countries that still have air links with the RF—Turkey, Serbia, Georgia, Armenia, and so on.

The most accessible route for residents of the occupied territories who left for Europe remained the land route through Belarus. Citizens of Ukraine can enter the Republic of Belarus and, using air travel, reach the checkpoint of the state border in the RF—Moscow (Sheremetyevo Airport). In 2024, the Kremlin and Belarus agreed on a mechanism for filtering Ukrainian citizens to the air checkpoint of the state border in the RF—Moscow (Sheremetyevo Airport). The State Border Committee of the Republic of Belarus began to carry out preliminary filtering of Ukrainian citizens, not allowing them into Belarus. The passports of Ukrainian citizens were marked with a "Ban on entry to Belarus", while data on the number of Ukrainian citizens who were denied entry to the Republic of Belarus are not published.

According to the State Border Committee of the Republic of Belarus, a total of 272,972 Ukrainian citizens transited through the territory of the Republic from February 24, 2022 to December 2024. A total of 197,769 Ukrainian citizens transited to the air checkpoint of the state border in the RF—Moscow (Sheremetyevo Airport) from 2023 to 2024 (data on the number of Ukrainian citizens transiting through Belarus in 2023 and 2024 are provided in Table 2).



Ukrainian citizens' passports were marked with "Ban on entry to Belarus"



During the period from February 24, 2022 to December 2024, 272,972 citizens of Ukraine passed through the territory of the Republic of Belarus in transit

**Table 2. Data on the number of Ukrainian citizens who transited through Belarus in 2023 and 2024**

2023	71,289
January-September 2024	126,480
Total	197,769



In turn, the analysis of our own data sources confirms the information that, starting from October 2023 (the moment of restriction of entry into the RF of Ukrainian citizens), the growth in migration exchange with Ukraine in the RF has sharply decreased, which confirms the information about a significant increase in the facts of "declaring undesirability of stay on the territory of the RF" for Ukrainian citizens at Sheremetyevo Airport:

- in January–October 2023, the decrease in the growth in migration exchange between the RF and Ukraine amounted to (minus) –19.8 thousand people compared to the corresponding period of the previous year;
- in January–November 2023, the reduction in migration growth in migration exchange with Ukraine amounted to (minus) –23.8 thousand compared to the corresponding period of the previous year;
- according to the results of 2023, there was a negative migration increase in the population exchange with Ukraine due to a 65.8% reduction in the number of arrivals. The number of those who left the RF was 80,532 Ukrainian citizens. The number of those who left–80,532 people–refers to those Ukrainian citizens who were denied entry to the RF through the border checkpoint in the RF–Moscow (Sheremetyevo Airport);
- in January–February 2024, the negative migration increase was (minus) –9,156 citizens of Ukraine, during the same period, 5,186 citizens of Ukraine were able to enter the RF;
- for January–June 2024, the decrease in the growth in the migration exchange of the RF with Ukraine amounted to (minus)–26,421 people. The number of people arriving in the RF from Ukraine was 14,920 people, and the number of people leaving was 26,421 people. The negative population growth was 11,501 people. The number of people leaving–26,421 people–means those citizens of Ukraine who were denied entry to the RF through the border checkpoint in the RF–Moscow (Sheremetyevo Airport);
- for January–September 2024, the decrease in the growth in the migration exchange of the RF with Ukraine amounted to (minus) –34,928 people. The number of people arriving in the RF from Ukraine was 19,284 people, and the number of those leaving was 34,928 people. The negative population growth was 15,644 people. The number of those leaving–34,928 people–refers to those citizens of Ukraine who were denied entry to the RF through the border checkpoint in the RF–Moscow (Sheremetyevo Airport) (data on migration indicators between the RF and Ukraine for 2023 and 2024 are given in Table 3).



**Table 3. Data on migration rates between the RF and Ukraine for 2023 and 2024**

	Number of arrivals	Number of dropouts	Migration increase (+), decrease (-)
2023	50,928	- 80,532	- 29,604
January-September 2024	19,284	- 34,928	- 15,644
Total	70,212	-115,460	-45,248

In 2023-2024, 197,769 Ukrainian citizens transited through Belarus to the RF alone; during the same period, only 70,266 Ukrainian citizens were able to enter the RF from Sheremetyevo Airport, who were most likely returning to the occupied territories to re-register their ownership of residential buildings and apartments.

The negative balance among Ukrainian citizens who transited through Belarus to the border checkpoint in the RF—Moscow (Sheremetyevo Airport) is (minus) -127,503 people.

During the same period, 2023-2024, the number of Ukrainian citizens who left the border checkpoint in the RF—Moscow (Sheremetyevo Airport) was 115,460 people (the number of those who left—115,460 people—refers to those Ukrainian citizens who were denied entry to the RF through the border checkpoint in the RF—Moscow Sheremetyevo Airport).

Thus, starting from 2023 to 2024, approximately 242,963 Ukrainian citizens were denied entry into the territory of the RF.



Taking into account the approximate estimate of the number of houses and apartments of Ukrainian citizens remaining in the occupied territories of Luhansk, Donetsk, Zaporizhzhia, and Kherson Oblasts—926,765 real estate objects and the number of 70,266 Ukrainian citizens who entered the RF from 2023 to September 2024, it can be assumed that in the near future, the occupation administrations will confiscate 856,499 real estate objects: individual houses and apartments in multi-story buildings.

**In general, there are several factors that enable the Russian government to expel Ukrainian citizens from the occupied territories.**



**The first block** is the deliberate creation of unbearable living conditions for the population disloyal to the occupation administration and the Kremlin's policies.

This is done through a set of measures, including economic pressure (restricting access to administrative services for people without a Russian passport, forced exchange of documents), political repressions (mass arrests, disappearances, trials without due process), and information warfare (propaganda, censorship, and blocking of independent media). All this creates an atmosphere of fear and hopelessness, forcing people to leave their homes. Mass emigration not only reduces the number of potential protesters but also ensures the “cleansing” of the territory of undesirable elements, forming a more pliable population.



Along with economic and administrative restrictions, the occupants actively use the tactics of "filtration camps", where citizens are subjected to brutal interrogations, determining their loyalty to Russia. Those who are considered unreliable are deported, often without the possibility of returning.



**The second block is connected with a large-scale redistribution of property.**

Here we are talking not only about private property of citizens—apartments, houses, and land plots—but also about large commercial objects: enterprises, industrial plants, agricultural lands, tourist infrastructure objects (recreation centers, hotels, and restaurants). The occupation "property ministries" created in the occupation administrations are engaged in confiscation, forced nationalization, and fictitious privatization, often through sending men to the front line or simply by declaring the property "ownerless". This seizure of assets provides the occupants with significant financial resources, which are used not only to finance the occupation apparatus but also to fill the pockets of officials and the military as a result of large-scale corruption.

The lack of transparency and control creates conditions for lawlessness and arbitrariness. In addition, the seizure of enterprises allows the occupants to control the region's economy, providing for their own needs and placing the local population in dependence.



**The third block represents forced Russification.**

This includes replacing the Ukrainian language with Russian in education, government institutions, and the media. Ukrainian schools and universities are closed; Ukrainian culture is destroyed or distorted. A new historical narrative is being introduced, based on propaganda and falsification. The goal of these actions is the complete eradication of Ukrainian identity and the formation of a sense of belonging to the "Russian world".



**The fourth block** is related to the fact that the Russian occupation administration in the temporarily captured territories of Ukraine is actively pursuing a policy of replacing the local population with Russian citizens.

This policy, which is a planned demographic operation, is aimed at changing the ethnic and political landscape of the region, and is one of the key elements of the Kremlin's long-term strategy to annex and integrate the captured territories into the RF. The key instrument of this strategy is the creation of attractive conditions for the migration of Russians to the occupied lands of Ukraine.



**The fifth block** is the material conditions for the migration of Russians. One of the main incentives for moving is the significantly higher wages offered to Russians in the occupied territories compared to wages in similar regions of Russia. This difference is due not only to a deliberate policy of raising wages to attract labor but also to a shortage of qualified personnel among the local population, some of whom were forced to flee due to military action or repression by the occupation authorities. In some cases, the difference in wages between the occupied part and the regions of the RF can reach two or even three times the size.



**The sixth block: mortgages and cheap housing.**

*In addition to high salaries, an important factor is the provision of preferential mortgages. Unlike Russian regions, where obtaining a mortgage can be a complicated process and with a high interest rate, special programs are in place in the occupied territories, providing Russians with access to housing on favorable terms. This allows them to more easily adapt to a new place of residence and purchase their own housing at significantly lower prices than in Russia. These programs, financed from the Russian budget, are seen as a tool for gradually changing the demographic balance in favor of the Russian population.*



**The seventh block is the creation of a militarized zone.**

*One cannot ignore the military aspect of this migration. The creation of militarized clusters and military bases in the occupied territories attracts Russians who are ready to serve in the army or work in the structures that support the activities of military units. This provides them with a stable income and social guarantees, as well as the opportunity to move their families to the occupied territories. As a result, military towns, military bases, and military training grounds become centers of attraction for the Russian population, further strengthening Russian control. Thus, Russians are moving en masse to the occupied territories.*

*All these blocks are interconnected and reinforce each other. The goal of such a policy is not only the seizure of territory but also the complete subjugation of the population, its assimilation and integration into the Russian system. This system is aimed at the destruction of Ukrainian statehood in the occupied territories and the creation of conditions for their further annexation. In general, the policy of population replacement in the occupied territories of Ukraine is a multi-level operation based on economic and military levers aimed at the long-term annexation of territories and a change in their ethno-national composition. This policy violates international humanitarian law and is a war crime.*

# Forecast of confiscations in 2025

At the moment, the Russian government has issued a three-year roadmap for the seizure of real estate and other property in the occupied parts of Ukraine. As of September 1, about 1.3 million real estate objects in the occupied territories were entered into the Unified State Register of Real Estate (USRRE) by Rosreestr bodies, which is almost 25% of the total number of objects.

At the same time, the occupants and their accomplices from among local collaborators gathered to process data on more than 5.5 million

real estate objects. In order to activate the filling of the USRRE with information on real estate objects, taking into account the instructions of the President and the Government of the RF, an interdepartmental roadmap for 2024-2026 has been developed, within the framework of which work will be carried out on the inventory of real estate objects for the purpose of subsequent entry into the USRRE of information about them, including information on identified ownership right holders, on public lands, and on free lands for the purpose of involving them in circulation.



Deputy Minister of Construction, Housing, and Utilities of the RF Almaz Khusainov together with the Head of Rosreestr of the RF Oleg Skufinsky held a working meeting on the issue of state registration of real estate in the occupied territories

In December 2024, Deputy Minister of Construction, Housing, and Utilities of the RF Almaz Khusainov, together with the Head of the Federal Service for State Registration, Cadastre, and Cartography of the RF (Rosreestr) Oleg Skufinsky, held a working meeting on the development of the state registration system of real estate and spatial data infrastructure in the occupied territories until 2030.

Special attention was paid to the program of "creation of a real estate register in the territory of the Donetsk and Luhansk People's Republics, Zaporizhzhia, and Kherson Oblasts." One of the main goals of the program is to reduce the period of state registration of rights in the occupied territories to real estate and state cadastral registration to one working day.



In the occupied territories, it is planned to conduct a comprehensive inventory, create a geodetic and cartographic base, and other activities. Based on the results of the program's implementation, by the end of 2030, the occupied territories are planned to achieve average Russian indicators: the creation of a "Unified Electronic Cartographic Base", accessible receipt of services in electronic form and reduction of the terms of their provision, cadastral assessment, as well as the implementation of the Federal State Information System Unified Digital Platform "National Spatial Data System" in the occupied territories.

In September 2024, the Government of the RF adopted Order No. 2525-r, according to

which it allocated budgetary appropriations in the amount of 314,759.4 thousand rubles to Rosreestr in 2024 for the purpose of transferring to the "Unified State Register of Real Estate information on previously registered real estate objects located in the Donetsk People's Republic, Luhansk People's Republic, Zaporizhzhia Oblast, and Kherson Oblast, acquiring space images in relation to the territories of the specified subjects of the RF, meaning the performance in 2024 of work to form data on at least 327,198 real estate objects previously registered in the territories of the Donetsk People's Republic, Luhansk People's Republic, Zaporizhzhia Oblast, and Kherson Oblast." The work must be completed by March 1, 2025.



At the same time, the "confiscated" property will be divided into several levels, where it will be distributed. So the first level is "federal", the second level is "regional", and the third is "municipal". At the moment, the occupation authorities are rapidly conducting an audit of property, for example, the "Ministry of Property and Land Relations of IAF LPR" plans to complete work on the delimitation of property into federal, regional, and municipal property at the beginning of 2025.

Thus, one of the points of the "road map" for the redistribution of property speaks of extending the validity period of technical passports for real estate objects until January 1, 2027, instead of 2025, and now they will continue to be "the basis for the implementation of state cadastral registration."

In this way, the occupants say that "the preparation of a new technical plan in the presence of an (old) technical passport for a real estate object is not required for the implementation of state cadastral registration and (or) state registration of rights to real estate objects." This allows them to significantly simplify the bureaucratic procedure and use old documents for re-registration of property.

In the near future, a significant contingent from Russia is planned to be redeployed to the temporarily occupied territories of Ukraine: about 10,000 specialists, together with their families. This large-scale resettlement, initiated by the

occupation authorities, pursues the goal of strengthening control over the captured regions and gradually integrating them into the Russian system of governance. However, the implementation of this plan faces serious difficulties, the main one being the provision of housing for such a large number of new arrivals.

To solve this problem, the occupation authorities resort to barbaric methods, expropriating the housing of Ukrainian citizens on a large scale. The expropriation process takes place under the pretext of "mismanagement" of residential premises. At the same time, the occupants are aware that the legal owners, forced to leave their homes due to military action or occupation, are deprived of the opportunity to prove their ownership in a timely manner. Collecting the necessary documents, appealing to the relevant authorities controlled by the occupants is practically impossible in the conditions of war and occupation.



In order to speed up the process, additional administrative capabilities will be created. One of these methods is the creation of special commissions whose task is to record so-called "ownerless" property. For example, in Melitopol, more than 100 residential houses have already been inspected, which corresponds to approximately 10,000 apartments. This indicates the scale of their operation and that they are actively looking for ways to control real estate. It is also planned to increase the number of members of these commissions and increase the number of objects inspected.

Another factor in the intensification of the "confiscation" of property has been the creation of additional barriers to contesting the process of expropriation of this property. According to information coming from Donetsk, the occupants inform residents in advance of their visits by posting announcements in the entrances. These announcements indicate the date and time when the commission plans to come. This step is probably intended to create the illusion of the legality of their actions and ensure a more organized approach to the process. Residents are informed in advance that they need to prepare certain documents to confirm their rights to housing.

However, it is worth noting that only apartment owners must receive representatives of the occupation authorities at the appointed time, and since they are often not in the city, it is almost impossible to defend their apartments.

Thus, it can be assumed that additional various bureaucratic obstacles will be created for property owners, which further complicates the task of returning property.

Moreover, the expropriation process will be carried out at an accelerated pace in 2025, bypassing any legal procedures. It is important to note that the accelerated process of "confiscation" of property will be facilitated by a number of missing norms by which property owners can defend their rights. For example, there is no independent judicial control, and decisions are made exclusively by occupation administrations acting in the interests of the Russian side. This is a gross violation of international humanitarian law, specifically the Fourth Geneva Convention, which prohibits the forced displacement of civilians and the expropriation of private property in occupied territories.

**Электронная регистрация  
перехода прав собственности**

Совместный сервис Сбербанка и Росреестра  
Услуга доступна как для ипотечных, так и неипотечных сделок

**Преимущества сервиса «Электронная регистрация»**

- Экономия до 4 рабочих дней**
  - Срок регистрации сокращается за счет передачи документов онлайн из Банка сразу в Росреестр, минуя МФЦ;
  - Общий срок регистрации сделки составляет до 5-7 рабочих дней (для «ипотечных» квартир) согласно действующего законодательства.
- Регистрация права собственности за 1 визит в Банк вместо 4**
  - Не нужно приезжать в МФЦ для подачи и получения документов;
  - Не нужно приезжать в Банк для проведения расчетов с продавцом, продавец получит деньги на основании выписки из ЕГРП.

In November 2024, Rosreestr provided branches of Sberbank of the RF in the occupied territories of the Luhansk and Donetsk Oblasts with access to online registration of real estate



Also, in the occupied territories, the integration of credit institutions from the RF will be strengthened to organize a mechanism for lending for the purchase of confiscated real estate. In November 2024, Rosreestr provided branches of Sberbank of the RF in the occupied territories of the Luhansk and Donetsk Oblasts with access to online registration of real estate. In order to intensify real estate purchase and sale transactions, Rosreestr began to develop electronic interaction in the field of registration of rights with real estate market participants in the occupied territories. Sberbank of

Russia was the first to receive access to the electronic method of submitting documents. Access to online registration of real estate provides for the possibility of submitting documents for registration of rights, restrictions on rights, and encumbrances on real estate in electronic form. Rosreestr has ensured full technical readiness of the isolated productive circuit of the Unified State Register of Real Estate with large credit institutions that want to submit documents online for state registration of real estate in the occupied territories, and has carried out appropriate organizational measures.



In addition to confiscation, preparations are underway in the occupied territories for a large-scale redistribution of property belonging to legal entities and citizens of Ukraine.

In November 2024, the occupation legislative body of IAF LPR adopted Law No. 103-I "On the Privatization of State Property of the Luhansk People's Republic". The adopted document "regulates the issues of privatization of state property of the Luhansk People's Republic, determines the procedures for privatization, payment, and transfer of money from the sale of such property, as well as the specifics of the legal status of joint-stock companies and LLCs, shares, and stakes in the authorized capital of which are in the state ownership of the Republic." Similar legislative acts on the privatization of property are at the stage of development by the occupation legislative bodies of the Donetsk, Zaporizhzhia, and Kherson Oblasts.

Also, in the occupied territories, property confiscated from Ukrainian citizens is actively leased at the level of municipal entities. Since the beginning of 2024, the occupation local government bodies have begun to adopt legislative acts that regulate the procedure for leasing confiscated property.

In November 2024, the occupation administration of Luhansk approved a new procedure for leasing municipal property confiscated from legal entities and citizens of Ukraine through auctions. Auctions or competitions for the right to conclude contracts for "leasing

municipal property are held electronically and are open in terms of the composition of participants and the form of submitting proposals."

The procedure for holding an auction provides that after the registration of the future lot in the Unified State Register of Real Estate of the RF, a competition of appraisers is announced, after which an agreement is concluded with the winner, the future lot is assessed and the tender documentation is formed, and then a decision is made by the head of the city occupation administration to hold an auction. Any legal entity or individual, including individual entrepreneurs, can participate in the competition but for this, each competitor must register in the GIS TORGY system. The starting price of the lot is determined on the basis of a report on the market rent made by the appraiser, and the auction "step" is five percent of the starting price of the lot.

In occupied Luhansk alone, about 80% of commercial real estate confiscated from Ukrainian citizens—commercial real estate, including enterprises and land plots under them, facilities for warehousing and office placement, shopping centers, stores, catering facilities, and so on—were classified as municipal property during the division of property into federal, regional, and municipal property.

# Acts adopted by the occupation administrations concerning the confiscation of property in the occupied territories of Ukraine

In the temporarily occupied territories, there are two groups of legislative acts that regulate the procedure for confiscation of property belonging to legal entities-entrepreneurs and citizens of Ukraine. The first group includes federal legislative acts

adopted by the State Duma of the RF, as well as decrees of the Government of the RF. The second group includes normative legal acts adopted by the occupation legislative bodies, as well as decrees of the occupation heads of administrations and governments.

## Legislative acts adopted by the State Duma and the Government of the RF

The basic laws of the RF that regulate the procedure for confiscation of property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories are federal constitutional laws No. 5-FKZ, No. 6-FKZ, No.

7-FKZ, No. 8-FKZ "On the admission to the RF and the formation within the RF of new subjects—the Luhansk and Donetsk People's Republics, Zaporizhzhia, and Kherson Oblasts." In particular, the signed laws:

### **A Establish the validity period of documents confirming the right of ownership of real estate, issued by state and other official bodies of Ukraine, as well as the procedure for managing property recognized as ownerless:**

- documents that are the basis for state registration of rights to real estate located in the occupied territories may be submitted before January 1, 2028, for state registration of the relevant rights, restrictions, and encumbrances by the bodies that carry out state registration of rights to real estate and transactions with it, in the Unified State Register of Real Estate in the manner established by the legislation of the RF;
- management of property located on the territory of the occupied territory, which has signs of ownerlessness and is not classified as federal property, property of a constituent entity of the RF or municipal property, is carried out by local authorities in the manner established by the Government of the RF, unless otherwise provided by this Federal Constitutional Law;



**B** **Establish the specifics of regulating relations in the sphere of real estate turnover in the occupied territories.** In particular, regulatory legal acts adopted by the occupation legislative bodies before January 1, 2028, may establish regulatory features for:

- land relations, relations in the sphere of cadastral registration of real estate and state registration of rights to real estate and transactions with it, cadastral activities and cadastral relations, state cadastral valuation, land management (except for the protection, use, and circulation of lands, the right of federal ownership of which arises by virtue of federal law) in agreement with the federal executive body authorized to implement normative and legal regulation in the relevant sphere;
- property relations, including land turnover, in agreement with the federal executive body exercising functions for the management of state property.

**C** **Establish the specifics of regulating relations in the sphere of use and protection of subsoil resources in the occupied territories.**

In particular, until January 1, 2025, subsoil use is permitted in subsoil areas located in the occupied territories, in accordance with documents issued by state and other official bodies of Ukraine. The said documents are not subject to change or re-registration. Extension of their validity is not permitted (data on legislative acts adopted by the State Duma and the Government of the RF, which regulate the procedure for confiscation of property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories are provided in Table 4).

**Table 4. Legislative acts adopted by the State Duma and the Government of the RF that regulate the procedure for confiscation of property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories**

Date of adoption	Title of the legislative act
March 18, 2022	Order of the Government of the RF No. 542-r "On the creation of a working group for the implementation of a special infrastructure project"
October 4, 2022	Federal Constitutional Laws No. 5-FKZ, No. 6-FKZ, No. 7-FKZ, No. 8-FKZ "On the Admission to the RF and the Formation within the RF of New Subjects—the Luhansk and Donetsk People's Republics, Zaporizhzhia, and Kherson Oblasts"
November 21, 2022	Federal Law No. 451 "On Amendments to the Federal Law "On the Entry into Force of Part One of the Civil Code of the RF"
December 27, 2022	Resolution of the Government of the RF No. 2452 "On the coordination of the application of legal acts, concession agreements, contracts, and agreements providing for the transfer for free use, lease, trust or other management, economic management of state, municipal, or other property, the disposal of which was carried out by state and other official bodies of the Donetsk People's Republic and the Luhansk People's Republic, public authorities of the Zaporizhzhia Oblast and the Kherson Oblast on the day of the admission to the RF of the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia Oblast, and the Kherson Oblast and the formation of new subjects within the RF"

**Table 4. Legislative acts adopted by the State Duma and the Government of the RF that regulate the procedure for confiscation of property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories**

Date of adoption	Title of the legislative act
December 28, 2022	Resolution of the Government of the RF No. 2474 "On approval of the Rules for the management of objects of the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia Oblast, and the Kherson Oblast that have signs of ownerlessness and are not classified as federal property, property of a subject of the RF, or municipal property, located in the territories of the said subjects of the RF"
December 29, 2022	Resolution of the Government of the RF No. 2501 "On approval of the specifics of management and disposal of individual property objects located in the territories of the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia Oblast, and the Kherson Oblast, which are in state or municipal ownership, as well as the delimitation of property between the RF, each of the specified subjects of the RF and its municipal entities"
February 17, 2023	Resolution of the Government of the RF No. 256 "On approval of the Rules for the application of subsoil users on subsoil plots located in the territories of the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia Oblast, and the Kherson Oblast, with applications for the right to use subsoil plots"
February 18, 2023	Resolution of the Government of the RF No. 264 "On approval of the Rules for the adoption by an authorized state body of a constituent entity of the RF of a decision on granting the right to use subsoil in subsoil areas located in the territories of the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia Oblast, and the Kherson Oblast, without holding auctions"
July 4, 2023	Resolution of the Government of the RF No. 1099 "On approval of the Rules for the transfer by the Public-Law Company 'Territory Development Fund' for lease of property located in the territories of the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia Oblast, and the Kherson Oblast, and on amendments to the charter of the Public-Law Company 'Territory Development Fund'"
March 6, 2024	Resolution of the Government of the RF No. 272 "On certain issues of disposal by the Public-Law Company 'Territorial Development Fund' of property located in the territories of the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia Oblast, and the Kherson Oblast."



On March 18, 2022, the Russian government issued Order No. 542-r to create a collegial body whose powers include the implementation of a "special infrastructure project" in the occupied territories. The collegial body was granted the rights of:

- preliminary approval of lists for the delimitation of property
- coordination of the conclusion of property lease agreements
- establishing rules for conducting auctions of movable property
- the introduction of external management in industrial enterprises, and so on.

The text of the order has not been published. The leadership of the collegial body has been entrusted to Deputy Prime Minister of the Government of the

RF Marat Khusnullin, and the Minister of Construction, Housing, and Utilities of the RF Irek Faizullin has been appointed his deputy.



On November 21, 2022, the State Duma of the RF adopted Federal Law No. 451. The provisions of this law created all the conditions for the forced confiscation of property of business entities registered in the legal field of Ukraine, whose real estate objects were located in the territories occupied by the RF after February 24, 2022.

The law stipulated that individuals registered as individual entrepreneurs in the occupied Donetsk, Luhansk, Zaporizhzhia, and Kherson Oblasts could conduct their business activities until June 30, 2023, without re-registration in accordance with Russian legislation. To conduct business after June 30, 2023, all individual entrepreneurs must register as such in the legal field of the RF. To re-register, individual entrepreneurs were required to have a passport confirming their Russian citizenship.

The adopted law also obliged all business entities that were registered in the legal field of Ukraine, and their real estate was located in the occupied territories as of September 30, 2022, to bring their constituent documents into compliance with the legislation of the RF and apply for the entry

of information into the Unified State Register of Legal Entities of the RF or to acquire the status of a branch (representative office) of a foreign legal entity. To re-register business entities in the occupied territories, it was necessary to submit a package of documents, including a document confirming Russian citizenship.

In relation to business entities that failed to comply with the requirements to bring their constituent documents into compliance with the current legislation of the RF in the occupied territories, sanctions were imposed: exclusion from the Unified State Register of Legal Entities of the RF, which automatically led to a ban on economic activity in the occupied territories, and the right of ownership of their property was transferred to the occupation administrations.



Data on the offices of the Federal Tax Service of the RF opened in the temporarily occupied territories

The Russian legislation in force in the occupied territory gave the right to re-register property rights to movable and immovable property that belonged to business entities from Ukraine only if they had a document confirming their Russian citizenship.

According to the Federal Tax Service of the RF, which is responsible for the registration and re-registration of individual entrepreneurs and legal entities in the temporarily occupied territories, as of the beginning of November 2024, the Unified State Register of Legal Entities contains records of 40.6 thousand enterprises in the occupied territories (in the Federal Tax Service statistics, they are designated as "southwestern"). Of these, almost 7.8 thousand new legal entities were created, and about 32.8 thousand were re-registered.

In the first nine months of 2024, 2.7 thousand enterprises were opened and re-registered in these occupied territories (of which 2.2 thousand were new). In 2023, during the same period, there was an increase of 3.5 thousand companies. At the same time, since the beginning of 2023, 224 legal entities have ceased their activities in the occupied territory. Currently, most legal entities are concentrated in the occupied Donetsk (21.3 thousand) and Luhansk (11.9 thousand) Oblasts.

Also, as of November 2024, about 113 thousand small and medium-sized enterprises were registered in the occupied territories (this group includes not only legal entities but also individual entrepreneurs). In 2024, 8 thousand small and medium-sized enterprises ceased operations in the occupied territories.



According to the Federal Tax Service, as of October 2023, information on 31 thousand legal entities and 121 thousand small and medium-sized enterprises (this group includes not only legal entities but also individual entrepreneurs) operating in the temporarily occupied territories was entered into the Unified State Register of Legal Entities (data on the number of business entities registered in the occupied territories are provided in Table 5).

In December 2022, the Russian government adopted two resolutions, No. 2501 and No. 2474, which regulated the process of delimiting property rights between federal bodies of the RF and occupation administrations and the procedure for managing ownerless

property. These resolutions launched the process of confiscation of real estate belonging to legal entities-entrepreneurs and citizens of Ukraine between the RF, occupation administrations and municipalities, which should be completed by January 1, 2028.

**Table 5. Data on the number of business entities registered in the occupied territories**

Year	Number of registered legal entities (thousand)	Number of registered small and medium-sized enterprises (this group includes not only legal entities but also individual entrepreneurs) (thousand)
2023	31	121
2024	40.6	113





**In accordance with the Resolution No. 2501 of the Government of the RF, the list of property that may be exclusively in federal ownership of the RF included real estate in the occupied territories that are necessary to ensure the country's defense and security, including:**

- property of enterprises that ensure the stable, uninterrupted functioning of economic sectors and the maintenance of employment, according to the list determined by the collegial body established by the order of the Government of the RF dated March 18, 2022, No. 542-r;
- property necessary to ensure the activities of troops, other military formations, security agencies, and law enforcement agencies;
- reserve control points of government bodies, communications, and engineering infrastructure facilities intended for use during a special period;
- state reserves and mobilization reserves;
- property of enterprises of strategic importance for ensuring the country's defense and state security;
- property of enterprises producing weapons systems and components, explosives and toxic substances, fissile, and radioactive materials, aircraft, and military equipment;
- property of enterprises producing medicines and medical devices;
- property necessary to ensure the implementation of the functions and powers of the Central Bank of the RF, the powers of federal government bodies, the activities of organizations subordinate to them, including activities in the field of industrial safety, geological surveys, geodetic, and cartographic activities, air navigation activities, activities in the field of hydrometeorology and related fields, activities to provide navigational and hydrographic support for the navigation conditions of ships, activities in the field of legal protection and use of the results of intellectual activity for civil, military, special, and dual purposes, as well as activities in the field of standardization and activities to ensure the uniformity of measurements.

The Public Law Company "Fund for Development of Territories" (PLC "FDT") and the Federal Agency for State Property Management of the RF were appointed responsible for the process of delimiting property rights.

At the same time, the Federal Agency for State Property Management (its territorial bodies) were given the right to unilaterally refuse concession agreements, contracts, and agreements providing for the transfer of property for free use, lease, trust, or other management and economic management, concluded by state and other official bodies of the "Donetsk People's Republic, Luhansk People's Republic, Zaporizhzhia

Oblast, and Kherson Oblast before the entry into force of the Decree of the Government of the RF of December 29, 2022, No. 2501".

The management of property objects that show signs of ownerlessness and are not classified as federal property, property of a subject of the RF or municipal property in the occupied territories was assigned to the powers of the occupation authorities by the Resolution No. 2474 of the Government of the RF. In particular, real estate belonging to citizens of Ukraine (apartments, houses, garages, summer cottages, etc.) was transferred to the management of the occupation authorities.

In February 2023, the Russian government began the process of confiscating the rights to exploit subsoil resources in the occupied territories that belonged to legal entities-entrepreneurs and citizens of Ukraine. The adopted resolutions No. 256 and No. 264 regulated the processes of acquiring ownership rights to exploit subsoil resources and extract minerals.

Resolution No. 256 obliged all subsoil users in the occupied territories to submit applications to the Federal Agency for Subsoil Use of the RF by January 1, 2025—with respect to subsoil plots (except for subsoil plots of local significance) and to the occupation authorities—with respect to subsoil plots of local significance.

Resolution No. 264 granted the Ministry of Natural Resources and Environment of the RF the exclusive right to make decisions on granting the right to use subsoil in subsoil areas located in the occupied territories without holding an auction. The list of organizations that could receive the right to use subsoil in the occupied territories without an auction included those organizations "in accordance with the criteria approved by the supreme executive bodies of the constituent entities of the RF (with respect to subsoil areas of local significance), as well as organizations, the share (contribution) of the RF and (or) a constituent entity of the RF in the authorized

capital of which is more than 50 percent and (or) with respect to which the RF or a constituent entity of the RF has the right to directly or indirectly dispose of more than 50 percent of the total number of votes attributable to the voting shares (stakes) constituting the authorized capital of such organizations (with respect to subsoil areas that are not subsoil areas of local significance)."

Subsequently, the Russian government improved the mechanism for confiscating property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories.

By its Resolution No. 1099, the Government of the RF granted the PPC "FDT" exclusive rights to lease real estate (enterprises, other property complexes, individual objects related to real estate, and other property), which belonged to legal entities-entrepreneurs and citizens of Ukraine located in the occupied territories "in order to facilitate sustainable socio-economic development, attract investment in the development of existing and creation of new industries, development of transport and other infrastructure, construction, as well as improving the standard and quality of life of citizens", and also granted the exclusive right to dispose of movable property in the occupied territories.



The process of coordinating the transfer of real estate (enterprises, other property complexes, individual objects related to real estate, and other property) for lease located in the occupied territories is within the exclusive competence of the Ministry of Construction, Housing, and Utilities of the RF, which organizes the coordination of "executive bodies of the RF, as well as other interested state authorities to obtain a position on the issue of the Fund transferring property for lease to the applicant."

By the Resolution No. 272 of the Government of the RF, the PPK "FDT" was granted the exclusive right to dispose of individual objects of movable property belonging to legal entities-entrepreneurs and citizens of Ukraine and located in the occupied territories. The disposal of objects was carried out by the

PPK "FDT" by selling them at auction or selling objects without holding an auction. The procedure for organizing and holding auctions of real estate in the occupied territories was approved by the PPK "FDT" in agreement with the Ministry of Construction, Housing, and Utilities of the RF.

## Legislative acts adopted by the occupation legislative bodies, as well as decrees of the occupation heads of administrations and governments

After the adoption by the State Duma and the Government of the RF of the basic laws of the RF that regulate the procedure for confiscating property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories (federal constitutional laws No. 5-FKZ, No. 6-FKZ, No. 7-FKZ, and No. 8-FKZ "On the admission to the RF and the formation within the RF of new subjects—the Luhansk and Donetsk People's Republics, Zaporizhzhia, and Kherson Oblasts"), the occupation legislative bodies, as well as the

heads of the occupation administrations and occupation governments adopted a number of normative legal acts that detailed the procedure for confiscating the property of legal entities and citizens of Ukraine.

In October 2024, the law "On the privatization of state property of the Luhansk People's Republic" was adopted in the occupied Luhansk Oblast, which will allow for the further sale of property that was owned by legal entities and citizens of Ukraine.



Conventionally, the array of normative legal acts adopted by the occupation legislative bodies can be divided into seven groups, which regulate the procedure for confiscation of movable and immovable property belonging to Ukraine, legal entities-entrepreneurs of Ukraine, and citizens of Ukraine, as well as the privatization of confiscated property that belongs to legal entities-entrepreneurs and citizens of Ukraine:

- Confiscation of property that was owned by the state of Ukraine, territorial communities, as well as property owned by foreign states "that commit unfriendly acts against legal entities and individuals in the occupied territories".
- Adoption of decisions by bodies and officials of the occupation administrations on identifying, registering, and applying to the court with a demand for recognition of the right of ownership of the occupation administrations to property belonging to legal entities of Ukraine: ownerless buildings, structures, premises, and unfinished construction projects (with the exception of linear objects, real estate objects in the form of residential premises, residential buildings, and outbuildings).
- The procedure for making decisions by occupation administrations on the management of the property of legal entities belonging to legal entities-entrepreneurs of Ukraine in the occupied territories, including holding tenders (competitions, auctions) for the transfer of property for lease and for the sale.
- The terms and procedure for re-registration of property rights to property owned by legal entities and citizens of Ukraine, which is located in the occupied territories—until January 1, 2028.
- The procedure for confiscation and sale of movable property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories.
- The procedure for recognizing as "ownerless" and confiscating real estate (private homes, apartments in residential buildings, and rooms in residential buildings) that belong to citizens of Ukraine in the occupied territories.
- The procedure for privatization of property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories.

**Table 6. Legislative acts adopted by occupation administrations that regulate the confiscation of property belonging to legal entities-entrepreneurs and citizens of Ukraine**

Table 6. Legislative acts adopted by occupation administrations that regulate the confiscation of property belonging to legal entities-entrepreneurs and citizens of Ukraine		
1. Legislative acts of the occupation authorities, in accordance with which property owned by the state of Ukraine, territorial communities, as well as property owned by foreign states, "which commit unfriendly acts against legal entities and individuals in the occupied territories" was confiscated		
Date of adoption	Title of the legislative act	Basic Provisions
June 02, 2022	Decree of the head of the military-civil administration of the Zaporizhzhia Oblast No. 37-r "On the nationalization of land plots, natural resources, objects of strategic sectors of the economy, and property owned by Ukraine"	In accordance with the adopted documents, the following were transferred to federal ownership, as well as to the property of the occupation administrations: - property (land plots and other real estate objects, other property, including shares (interests) in the authorized capital of legal entities registered and (or) carrying out economic activities in the occupied territories) located in the state ownership of Ukraine, territorial communities (communities); - property owned by legal entities registered and (or) carrying out economic activities in the occupied territories, the founder (beneficial owner, controlling person, or beneficiary) of which is the state of Ukraine; - property owned by foreign states that commit unfriendly acts against legal entities and individuals in the occupied territories, as well as property owned by foreign persons associated with such states (including if such foreign persons have citizenship of these states, the place of their registration, the place of their predominant conduct of economic activity, or the place of their predominant extraction of profit from their activity are these states), and persons who are under the control of the said foreign persons, regardless of their place of registration or the place of their predominant conduct of economic activity.
September 25, 2022	Law of the People's Council of IAF LPR "On the specifics of regulating property and land relations on the territory of the Luhansk People's Republic"	
September 28, 2022	Law of the People's Council of IAF DPR "On some issues of property transfer to the ownership of the Donetsk People's Republic"	
September 28, 2022	Decree of the head of the military-civil administration of the Kherson Oblast No. 101/1-u "On features of regulation of property and land relations on the territory of the Kherson Oblast"	
2. Legislative acts of the occupation authorities that regulate the procedure for decision-making by bodies and officials of the occupation administrations on identifying, registering, and applying to the court with a demand for recognition of the ownership rights of the occupation administrations to ownerless buildings, structures, premises, and unfinished construction projects (with the exception of linear objects, real estate objects in the form of residential premises, residential buildings, and outbuildings)		
Date of adoption	Title of the legislative act	Basic Provisions
May 10, 2023	Decree of the Acting Head of IAF DPR No. 140 "On the specifics of acquiring the right of state and municipal ownership of ownerless real estate on the territory of the Donetsk People's Republic"	The bodies and officials of the occupation administrations were granted the right to identify, register, and apply to the court with a demand for recognition of the right of ownership of ownerless buildings, structures, premises, and unfinished construction projects



## 2. Legislative acts of the occupation authorities that regulate the procedure for decision-making by bodies and officials of the occupation administrations on identifying, registering, and applying to the court with a demand for recognition of the ownership rights of the occupation administrations to ownerless buildings, structures, premises, and unfinished construction projects (with the exception of linear objects, real estate objects in the form of residential premises, residential buildings, and outbuildings)

Date of adoption	Title of the legislative act	Basic Provisions
May 12, 2023	Decree of the acting head of IAF LPR "On the specifics of acquiring the right of state and municipal ownership of ownerless real estate on the territory of the Luhansk People's Republic"	(with the exception of linear objects, real estate objects in the form of residential premises, residential buildings, and outbuildings) that do not have an owner or whose owner is unknown, or whose right of ownership the owner has renounced.
June 28, 2023	Decree of the Acting Governor of Zaporizhzhia Oblast No. 180-u "On the specifics of acquiring the right of state and (or) municipal ownership in relation to ownerless property located on the territory of Zaporizhzhia Oblast"	
October 01, 2024	Law of the Kherson Oblast No. 64-ZHO "On the specifics of recognizing property located on the territory of the Kherson Oblast as ownerless and on the acquisition of the right of state ownership of the Kherson Oblast to such property"	

## 3. Legislative acts of the occupation authorities that regulate the procedure for making decisions on the management of the property of legal entities in the occupied territories, including the holding of tenders (competitions, auctions) for the transfer of property for lease and for the sale

Date of adoption	Title of the legislative act	Basic Provisions
August 18, 2023	Decree of the acting head of IAF DPR No. 299 "On the formation of a collegial body for the management and disposal of property objects"	The adopted documents regulate the actions of collegial bodies created in the occupied territories, whose powers include the consideration and adoption of decisions on the approval (refusal to approve) of legal acts and other decisions of the occupation authorities regarding the management of property, including decisions prior to sending to the Public-Law Company "Territorial Development Fund" providing for: holding tenders (competitions, auctions) for the transfer of property for lease, for the sale of property, etc.; conclusion of a concession agreement, contracts and agreements with the applicant, providing for the transfer of property for free use, lease, trust, or other management
August 29, 2023	Decree of the acting head of IAF LPR No. UG-425/23 "On the collegial body for the management and disposal of property objects"	
August 31, 2023	Decree of the Acting Governor of Zaporizhzhia Oblast No. 281-u "On the collegial body for management and disposal of property"	
February 13, 2024	Decree of the Governor of the Kherson Oblast No. 08-u "On the collegial body for management and disposal of property"	

#### 4. Legislative acts of the occupation authorities that regulate the terms and procedure for re-registering property rights to property belonging to citizens and legal entities located in the occupied territories—until January 1, 2028

Date of adoption	Title of the legislative act	Basic Provisions
June 30, 2023	Law of IAF DPR No. 459-IINS "On the specifics of regulating property and land relations on the territory of the Donetsk People's Republic during the transition period"	<p>The adopted documents define the terms and procedure for re-registration of rights by citizens and legal entities to property, including land plots and other real estate located in the occupied territories, as well as recognition of the rights of federal property, state property of the occupation administrations or property of the relevant municipalities, taking into account the specifics of management and disposal of individual property located in the occupied territories established by the Government of the RF.</p> <p>The regulations governing property and land relations in the occupied territories are in effect until January 1, 2028.</p>
May 30, 2023	Decree of the Acting Governor of Zaporizhzhia Oblast No. 127-u "On the Peculiarities of Regulating Property and Land Relations in the Territory of Zaporizhzhia Oblast"	
September 25, 2023	Law of IAF LPR No. 2-I "On the specifics of regulation of property and land relations on the territory of the Luhansk People's Republic"	
April 19, 2024	Law of the Kherson regional Duma No. 38-ZHO "On the specifics of regulation of property and land relations in the Kherson Oblast"	

#### 5. Legislative acts of the occupation authorities that regulate the confiscation and sale of movable property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories

Date of adoption	Title of the legislative act	Basic Provisions
February 08, 2024	Law of the People's Council of IAF LPR No. 43-I "On the specifics of regulating property rights in relation to ownerless movable things located on real estate objects located on the territory of the Luhansk People's Republic"	<p>The effect of the adopted documents extends, among other things, to the procedure in relation to ownerless movable property identified during the inventory of property complexes transferred to temporary management of business entities in the occupied territories.</p>
February 13, 2024	Law of the People's Council of IAF DPR No. 52-RZ "On the specifics of regulating property rights in relation to ownerless movable things located on real estate objects located on the territory of the Donetsk People's Republic"	
March 18, 2024	Law of the Kherson regional Duma No. 32-ZHO "On the specifics of regulating property rights in relation to ownerless movable things on real estate objects located on the territory of the Kherson Oblast"	



### 5. Legislative acts of the occupation authorities that regulate the confiscation and sale of movable property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories

Date of adoption	Title of the legislative act	Basic Provisions
May 20, 2024	Law of the Legislative Assembly of Zaporizhzhia Oblast No. 28 "On the peculiarities of regulating property rights in relation to ownerless movable things on real estate objects located on the territory of Zaporizhzhia oblast"	

### 6. Legislative acts of the occupation authorities that regulate the procedure for recognizing as "ownerless" and confiscating real estate (private houses, apartments in residential buildings, and rooms in residential buildings) that belong to citizens of Ukraine forced to leave the occupied territories

Date of adoption	Title of the legislative act	Basic Provisions
March 21, 2024	Law of the People's Council of IAF DPR No. 66-RZ "On the specifics of identifying, using, and recognizing the right of municipal property of municipal entities of the Donetsk People's Republic to residential premises that have signs of ownerless property located on the territory of the Donetsk People's Republic"	<p>The adopted documents regulate the procedure for confiscating "ownerless" private houses, apartments in residential buildings, and rooms in residential buildings that belong to Ukrainian citizens forced to leave the occupied territories as a result of the armed aggression of the RF.</p> <p>Signs of ownerless property in relation to residential premises are:</p> <ol style="list-style-type: none"><li>1) Failure to pay for housing and utilities for one year prior to the date of discovery of housing that shows signs of ownerless property</li><li>2) Lack of information on the registered right of ownership of residential premises in the Unified State Register of Real Estate</li><li>3) Failure to use residential premises, which, among other things, creates a threat to its safety (or to an apartment building if the premises are an apartment or a room in an apartment building), or to the safety of life and health of other persons (including the owners of other premises in an apartment building if the premises are an apartment or a room in an apartment building).</li></ol>
March 27, 2024	Law of the People's Council of IAF LPR No. 52-I "On the specifics of identifying, using, and recognizing the right of municipal property of municipal entities of the Luhansk People's Republic to residential premises that have signs of ownerless property located on the territory of the Luhansk People's Republic"	
May 20, 2024	Law of the Legislative Assembly of Zaporizhzhia Oblast No. 29 "On the specifics of regulating property rights in relation to real estate objects in the form of residential premises that have characteristics of ownerless property located on the territory of Zaporizhzhia Oblast"	
March 22, 2024	Resolution of the Government of the Kherson Oblast No. 25-pp "On approval of the Procedure for identifying and using residential premises that have signs of ownerless property on the territory of the Kherson Oblast"	



## 7. Legislative acts of the occupation authorities that regulate the procedure for the privatization of property belonging to legal entities-entrepreneurs and citizens of Ukraine

Date of adoption	Title of the legislative act	Basic Provisions
November 5, 2024	Law of IAF LPR No. 103-I "On the privatization of state property of the Luhansk People's Republic"	The adopted document regulates issues of privatization of state property of the Luhansk People's Republic, defines the procedures for privatization, payment, and transfer of money from the sale of such property, as well as the specifics of the legal status of joint-stock companies and LLCs, whose shares and stakes in the authorized capital are in the state ownership of the Republic.



Similar laws on the privatization of property are in the development stage of the occupation legislative bodies of the Donetsk, Zaporizhzhia, and Kherson Oblasts.

The legislative acts adopted in the RF and the occupied territories during 2022-2024 have built a controlled and fully managed vertical line of control associated with the confiscation and subsequent management of all movable and immovable property belonging to legal entities-entrepreneurs and citizens of Ukraine in the occupied territories.

In parallel, the Kremlin has created a fully controlled structure of occupation governments and municipal authorities in the temporarily occupied territories, which is an organizational copy of the RF's government. Only people from the RF are appointed to occupation ministries

that are of interest to the RF. A similar management structure has been built in municipal entities, where local collaborator officials holding the positions of heads of occupation municipal entities hold nominal positions, and decision-making centers are in the hands of deputies who are from the RF and are appointed in agreement with the relevant ministers of the RF and the ministers of the occupation governments.

This system was strengthened after the Russian presidential elections, when a new government was formed in May 2024, in which a number of ministers lost their positions.



The changes primarily affected those ministries whose sphere includes management of the most attractive sectors of the economy in the occupied territories—industry and trade, transport, energy, agriculture, water, and forest resources, as well as control over subsoil.

This fact indicates the strengthening of the Kremlin's control over the processes of confiscation of property belonging to legal

entities-entrepreneurs and citizens of Ukraine in the occupied territories and the redistribution of spheres of influence in the occupied territories.



In particular, the following lost their positions:

**Minister of Industry and Trade Anton Alikhanov replaced Denis Manturov in his post.**

Anton Alikhanov previously worked in the Ministry of Industry and Trade in various positions from 2013 to 2015. After that, he took the post of deputy head of the government of the Kaliningrad Oblast, subsequently becoming acting governor. In 2017, he was elected head of the Oblast;

**Minister of Transport Roman Starovoit replaced Vitaly Savelyev in the post.**

Before his appointment, Roman Starovoit served as governor of the Kursk Oblast. Before heading the Oblast, he headed Rosavtodor (2012-2018);

**Minister of Energy Sergei Tsivilev replaced Nikolai Shulginov.**

Tsivilev has served as governor of the Kemerovo Oblast for the past six years. Kemerovo Oblast Governor Sergei Tsivilev's wife, Anna, is a cousin of President Vladimir Putin. In turn, the press secretary of the Prime Minister Boris Belyakov said that Tsivilev, as the head of Russia's largest coal-mining region, has acquired many years of experience that will help him ensure the further development of the industry;



**Minister of Agriculture Oksana Lut replaced Dmitry Patrushev in the post.**

Oksana Lut has been working at the Ministry of Agriculture since 2018, and in 2021, she took up the position of First Deputy Minister of Agriculture.



There have also been changes in the circle of deputy prime ministers of the Russian government who were responsible for overseeing the activities of relevant ministries and executive bodies, which may also affect the redistribution of spheres of influence over the activities of enterprises in the occupied territories.

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**Deputy Prime Minister, overseeing the activities of the Ministry of Agriculture and the Ministry of Natural Resources, Roshydromet, Rosvodresursy, Rosleskhoz and Rosnedra,** as well as environmental issues, Dmitry Patrushev, replaced Victoria Abramchenko in the post.



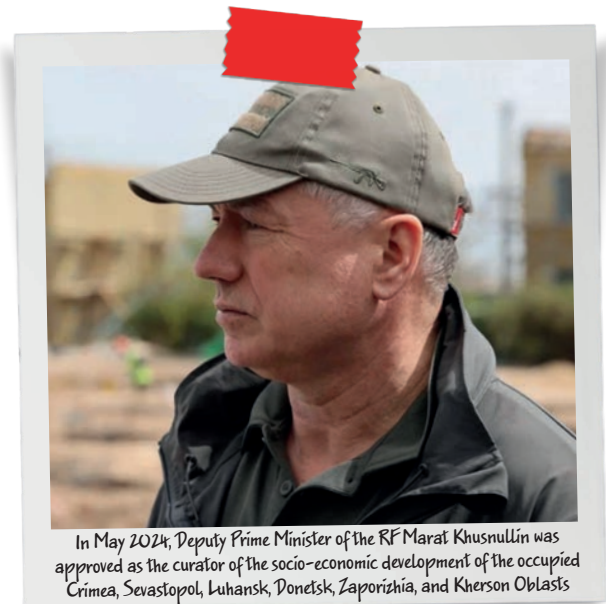
The director of the PPK "FDT" Ilshat Shagiakhmetov, the Minister of Construction, Housing, and Utilities of the RF Irek Fayzulin and the Deputy Prime Minister coordinating issues of Construction, Housing, and Utilities Marat Khusnullin, who control all processes in the temporarily occupied territories related to the confiscation, sale, lease, and privatization of real estate (enterprises, other property complexes, individual objects related to real estate, and other property), as well as the sale of movable property belonging to legal entities-entrepreneurs and citizens of Ukraine, retained their positions.

In May 2024, Deputy Prime Minister of the RF Marat Khusnullin was approved as the curator of the socio-economic development of the occupied Crimea, Sevastopol, Luhansk, Donetsk, Zaporizhzhia, and Kherson Oblasts. The Chairman of the Government of the RF approved the distribution of responsibilities between his deputies. Deputy Prime Minister Marat Khusnullin will oversee the provision of socio-economic development of the occupied Crimea, Sevastopol, Donetsk, and Luhansk People's Republics, Zaporizhzhia, and Kherson Oblasts.

Khusnullin was appointed for construction, architecture, and urban development, for the sphere of land relations, cadastral registration of real estate objects, as well as state registration of rights to real estate and transactions with it, housing, and communal services. His responsibilities also include issues in the sphere of geodesy, cartography, and spatial data, assigning names to geographical objects.



Director of PPK "FDT" Ilshat Shagiakhmetov



In May 2024, Deputy Prime Minister of the RF Marat Khusnullin was approved as the curator of the socio-economic development of the occupied Crimea, Sevastopol, Luhansk, Donetsk, Zaporizhzhia, and Kherson Oblasts



Khusnullin's responsibilities also included coordination of the development and implementation of a comprehensive plan for the development of transport, energy, telecommunications, social, and other infrastructure for the period up to 2036, necessary for achieving national goals. Khusnullin was also assigned the areas of construction, maintenance, and repair of roads, issues of road activities and traffic safety, development of public transport, and the coordination of the work of the Ministry of Construction, Rosreestr, Rostekhnadzor, Rosimushchestvo, and Rosavtodor.

Irek Fayzullin and Marat Khusnullin continue to head the sectors of the economy entrusted to them since the beginning of the full-scale armed

aggression of the RF against Ukraine and as of November 2024, Irek Fayzullin is in the sphere of influence of the Prime Minister of the RF Mishustin.



Fayzullin once stated that he had long-standing and trusting working relations directly with Mishustin back when the current Prime Minister, as the head of the Federal Agency for the Management of Special Economic Zones, inspected the special economic zone "Alabuga" in 2006–2008.

The key role in organizing processes related to the redistribution of property rights in the occupied territories is played by the PPK "FDT". In accordance with the charter of the PPK "FDT", the composition of the supervisory board, including the candidacy of the Chairman of the PPK "FDT", is approved by the Government of the RF at the suggestion of the Ministry of Construction, Housing, and Utilities of the RF. Deputy Chairman of the Government of the RF Marat Khusnullin was elected as the chairman of the supervisory board, and the Minister of Construction, Housing, and Utilities of the RF Irek Faizullin is also a member of the supervisory board.

On October 16, 2022, Ilshat Shagiakhmetov, who is originally from Tatarstan, like the Minister of Construction, Housing, and

Utilities of the RF Irek Faizullin, was appointed General Director of the PPK "Fund of Development of Territories". In March 2020, Shagiakhmetov became an assistant to Deputy Prime Minister Marat Khusnullin, who was appointed in January. In July of the same year, Shagiakhmetov became deputy head of the Deputy Prime Minister's secretariat. He oversaw the Federal Property Management Agency and Rosreestr, corporate governance issues of the state-owned companies Dom.RF, Avtodor, a single customer in construction, held positions in the government commission on road safety, as well as the government commission on the development of housing construction and assessment of the efficiency of using land plots owned by the RF.

**The Public-Law Company "Fund of Development of Territories" was created by the Resolution No. 1231 of the Government of the RF on October 7, 2017**

Full legal name:	Public-Law Company "Fund of development of territories"
Supervisor:	General Director Shagiakhmetov Ilshat Ilgizovich
TIN/CRRC:	7704446429/772301001
Number of founders:	1: Government of the RF
Date of registration:	October 20, 2017
Legal address:	115088, Moscow, 5 Sharikopodshipnikovskaya St.

As of early May 2024, the RF has completed the formation of a system for managing all movable and immovable property in the occupied territories. **All powers to transfer the delimitation of property rights, lease of real estate (enterprises, other property complexes, individual objects related to real estate, and other property), as well as**

**the sale of movable property of enterprises have been transferred to the sphere of the PPC "FDT", which is under the control of Deputy Prime Minister of the RF Marat Khusnullin and Minister of Construction, Housing, and Utilities of the RF Irek Fayzullin, who are part of the orbit of Prime Minister of the RF Mikhail Mishustin.**



# Confiscation of properties belonging to legal entities-entrepreneurs from Ukraine in the occupied territories

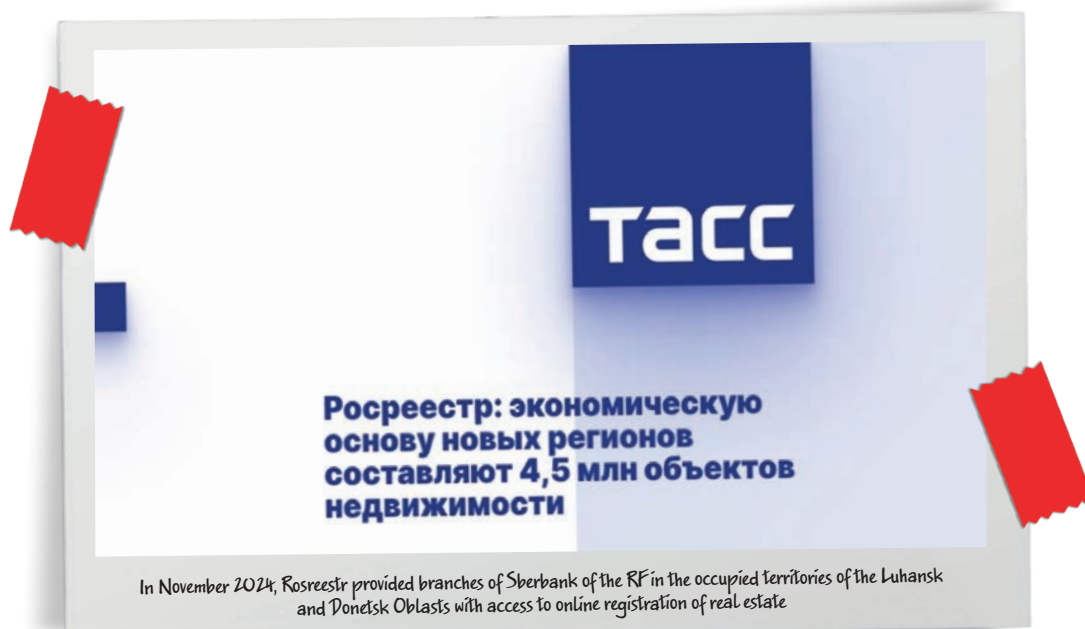
After the annexation of the occupied territories, the Kremlin began systematic work to confiscate property that belonged to legal entities-entrepreneurs from Ukraine. In October 2022, a commission created by the order of the Russian government No. 542-r began work in the occupied territories, which was engaged in "the transfer of non-functioning and abandoned

enterprises in four new regions, Kherson, Zaporizhzhia Oblasts, DPR, and LPR, to external management." Deputy Prime Minister of the Russian government Marat Khusnullin was appointed head of the commission, and Minister of Construction, Housing, and Utilities Irek Faizullin was appointed his deputy.



## The commission was granted the rights for:

- preliminary approval of lists for the delimitation of property
- coordination of the conclusion of property lease agreements
- establishing rules for conducting auctions of movable property
- the selection of administrations for the introduction of "external management" at industrial enterprises.



In September 2023, based on the results of the commission's work, Rosreestr reported that "about 4.5 million real estate objects in the Donetsk and Luhansk People's Republics,

Kherson, and Zaporizhzhia Oblasts constitute the economic base for development but the full register must be formed by 2030."

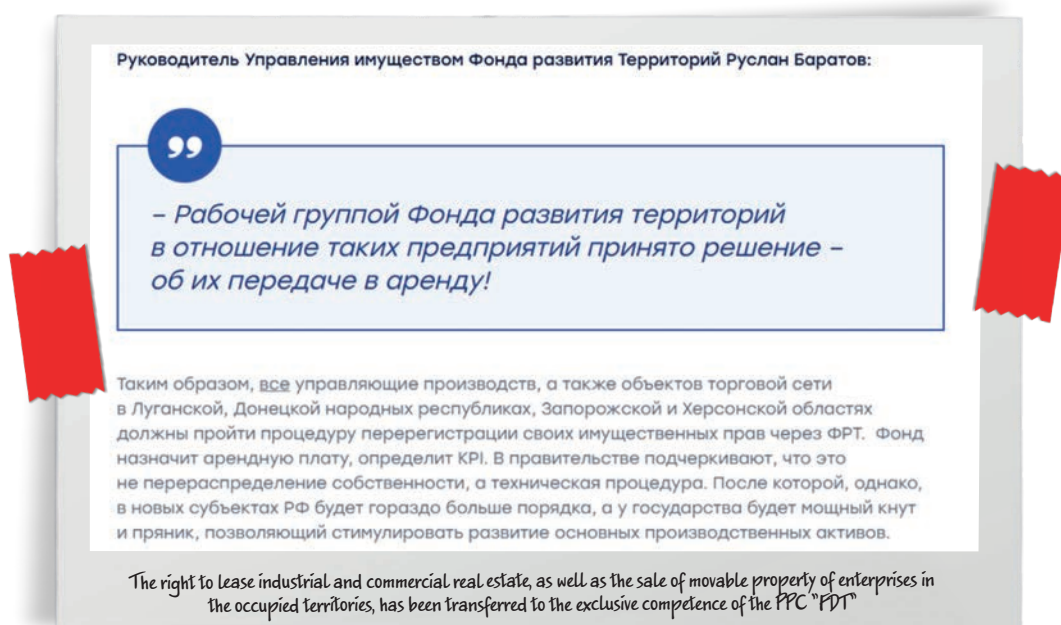
## Mechanism for confiscating objects belonging to legal entities-entrepreneurs from Ukraine in the occupied territories

A special mechanism for leasing property belonging to legal entities-entrepreneurs from Ukraine to the RF was developed for confiscation and appropriation of property rights. The right to lease industrial and commercial real estate objects (enterprises, other property complexes, individual objects related to real estate, other property), as well as the sale of movable property of enterprises in the occupied territories were transferred to the exclusive competence of the PPC "FDT".

In accordance with the developed mechanism, all confiscated property in the occupied territories, with the exception of

residential real estate, becomes the property of the RF on the basis of a simplified declaration form. In the future, the lessee must conduct a full inventory of the leased property and cadastral work.

The leasing mechanism is the only mechanism for distributing confiscated property in the occupied territories. The leasing mechanism covers all confiscated objects: any industrial and commercial real estate in the occupied territories, including enterprises and land plots under them, warehouse storage and office facilities, shopping centers, stores, and catering establishments, etc.



**To obtain property for lease, the applicant-tenant must submit an application to the PPC "FDT", to which additional documents indicating four performance indicators are attached:**

- The volume of investment in fixed capital.
- Average number of employees.
- The volume of trade turnover in monetary and physical terms.
- Taxable base for income tax.

After receiving the set of documents, the PPC "FDT" evaluates the submitted materials and sends them to the Ministry of Construction, Housing, and Utilities for approval. If the

application is approved, the applicant-tenant receives the priority right to lease and subsequently purchase the property into ownership.

Thus, all confiscated industrial enterprises, as well as commercial real estate objects in the occupied territories, must undergo a mandatory procedure for re-registration of their property rights through the PPC "FDT", which sets the rent

and determines key performance indicators.

In case of failure to achieve key performance indicators or distortion of tax reporting data, PPC "FDT" has the right to early termination of the property lease agreement.

## Confiscation of property of industrial enterprises

The main process of confiscating industrial enterprises that belonged to legal entities-entrepreneurs from Ukraine was carried out in 2023. In May 2023, the Ministry of Industry and Trade of the RF (Minpromtorg) reported that an inventory had been conducted and the potential of industrial enterprises in the occupied territories had been identified, which was planned to be developed in the future. The head of the Ministry of Industry and Trade of the RF Denis Manturov stated that "together with the Fund of development of territories, we are actively working to attract domestic investors to restore and launch ownerless enterprises. There are such enterprises." According to the Ministry of Industry and Trade, as of May 2023, about 700 enterprises were engaged in production activities in the occupied territories; about 250 were idle, which are of interest to Russian investors.



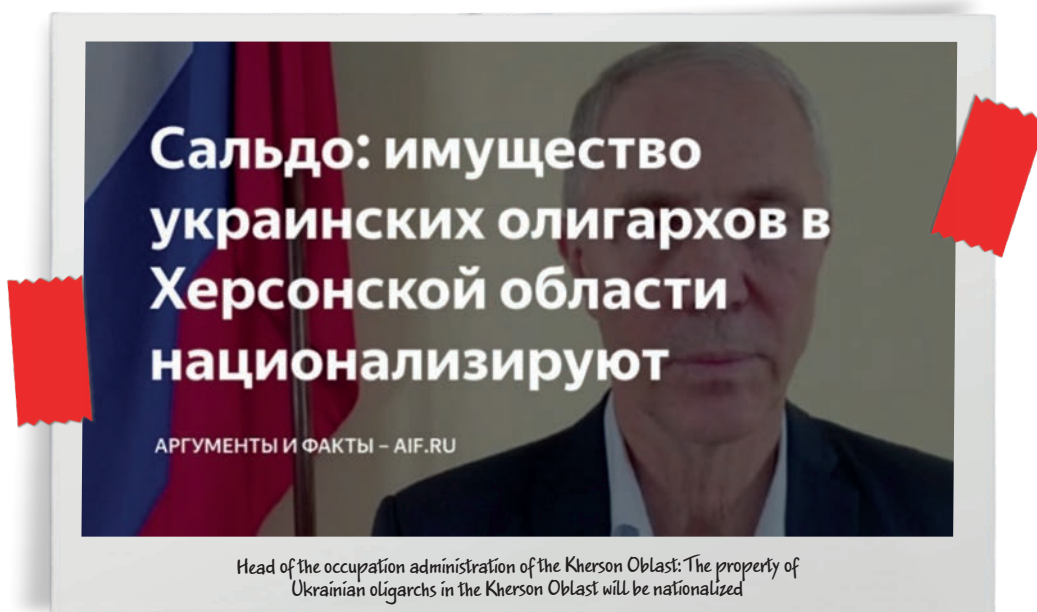
Head of the Ministry of Industry and Trade of the RF Denis Manturov



But already in June 2023, the Ministry of Industry and Trade clarified that 115 industrial enterprises had already been confiscated and "external management" had been introduced, and by the end of 2023, another 70 enterprises would be confiscated.

In March 2023, work began in the occupied Kherson Oblast to compile a register of confiscated property. The register included information on both enterprises and residential buildings: "everything will be re-registered according to Russian standards and registers so that the owners of enterprises and housing who decide to return to the Oblast can freely return the property to their management." Particular attention was paid to the "property of Ukrainian

oligarchs in the Kherson Oblast." The head of the occupation administration of the Kherson Oblast clarified that "we are talking about assets in the Oblast that Ukrainian businessmen did not re-register according to Russian law: such assets are considered abandoned and are transferred to the management of the State Property Fund. If this situation continues, they will be nationalized in the future."



In July 2023, the occupation administration of the Kherson Oblast announced plans to confiscate 25 idle enterprises and restore their operations within two years. The head of the occupation administration reported that "more than half of the enterprises located on the left bank of the Kherson Oblast are actually without management or founders. Therefore, many enterprises are in the process of launching with a search for effective investors on a competitive

basis, with investors not only from the RF but also from friendly countries." The occupation Ministry of Industry and Trade reported that "they intend to attract investors from friendly countries to launch idle enterprises. They hope in 2024-2025 to launch 14 enterprises." The list of enterprises includes the Large Electrical Machines Plant, the Kakhovka Electric Welding Equipment Plant, the Kakhovka Experimental Mechanical Plant, and OSV Technology.



Head of the occupation Ministry of Economic Development of the Kherson Oblast Ervin Musayev



The confiscation procedure in the occupied Kherson Oblast included the property of foreign companies. According to the head of the occupation Ministry of Economic Development Ervin Musayev, Western investors left many production sites and capacities in the Kherson Oblast, and they must be transferred to Russian entrepreneurs.



"We understand that many production sites, lands, and infrastructure were left by Western investors, and, therefore, there is a high need to transfer this infrastructure to our domestic investors," **Musayev said.**



Particular attention in the occupied Kherson Oblast was paid to power facilities. In July 2023, the procedure for confiscating the generating capacities of wind power plants began in the occupied Oblast, which was completed in November 2023. The occupation administration of the Kherson Oblast confiscated and transferred to the operation of the Rosseti Company all wind power plants that previously belonged to Ukrainian enterprises. In total, there were more than 200 wind power plants in the occupied part of the Kherson Oblast. The

electrical capacity consumed by the occupied part of the Oblast is about 160 MW. Wind power plants in the occupied territory of the Oblast generated 70-80 MW, which is about half of the required capacity.

As of September 2024, the number of confiscated enterprises in the occupied Kherson Oblast that belonged to legal entities and citizens of Ukraine reached 26 thousand. Data on half of the enterprises were entered into the registers of the Federal Service for State Registration, Cadastre, and Cartography (Rosreestr).



In total, there were about 110 industrial enterprises in the occupied part of the Kherson Oblast, 30 of which were in the manufacturing industry.

In March 2023, the occupation Ministry of Industry and Trade of IAF LPR reported that it planned to confiscate and introduce "external management" at 88 enterprises. The head of the occupation Ministry of Industry and Trade of IAF LPR Timur Samatov reported that "the Ministry of Construction, Housing, and Utilities of the RF has already approved the introduction of external management at 26 enterprises located in the territory of the occupied Luhansk Oblast." The occupation authorities stated that there are problems associated with the introduction of "external management": the lack of legislative regulation of the nationalization of property.

In the occupied Oblast, it is planned to transfer the Alchevsk Metallurgical Plant, the Stakhaniv Ferroalloy Plant, the Severodonetsk Azot Association, the Luhansk Foundry and

Mechanical Plant, the Luhansk Aircraft Repair Plant, Luhansk Polymetals, and other enterprises under external management.



Minister of Industry and Trade of IAF LPR  
Timur Samatov



As of June 2023, 35 industrial enterprises in the occupied Oblast have been confiscated and placed under "external management". Samatov said that "work to revive the region's industrial potential is not stopping. There are already investors for 35 enterprises, and

measures are being taken to transfer the facilities to trust management. These include the Luhansk Aircraft Repair Plant, the Luhansk Polymetals enterprise, the Donetsk Central Mechanical Engineering Design Bureau, trade enterprises, and others."



In total, there were more than 300 industrial enterprises in the occupied territory of Luhansk Oblast. Of these, 59 worked in metallurgy, 84 in mechanical engineering, 38 in light industry, and 20 in woodworking and paper production. More than 40 enterprises were engaged in the production of construction and non-metallic materials, and almost 60—in the chemical and pharmaceutical industries.

In the occupied Zaporizhzhia Oblast, their own demands were formed for the confiscation procedure and the introduction of "external management" at industrial enterprises. The head of the occupation administration of the

Zaporizhzhia Oblast stated that "abandoned enterprises will be transferred to the RF but in the case of industrial enterprises, the administration will retain a blocking stake."



In February 2024, the enterprises of PJSC Berdyansk reapers and PJSC Azov lubricants and oils in the occupied Oblast were transferred to the control of the state operator State Unitary Enterprise "Zaporizhzhia Oblast Development Corporation"

Despite the "triumphant" reports about the introduction of effective "external management" at the confiscated industrial enterprises, the workers of the "nationalized enterprises" were not paid wages for months, and the property itself was stolen. In February 2024, the enterprises of PJSC "Berdyansk reapers" and PJSC "Azov lubricants and oils" in the occupied region were transferred to the control of the state operator State Unitary Enterprise "Zaporizhzhia

Oblast Development Corporation". The decision to transfer was made "in connection with the dishonest work of the previous administrator". The occupation administration stated that the primary tasks of the State Unitary Enterprise "Zaporizhzhia Oblast Development Corporation" are resumption of work of enterprises, attraction of large investors with state participation, inventory of the entire property complex, and repayment of wage arrears.



As of October 2023, 122 enterprises owned by Ukrainian legal entities-entrepreneurs were confiscated and placed under "external management" in the occupied Zaporizhzhia Oblast. Vice Prime Minister of the occupation government Andriy Kozenko stated that "today, many enterprises in the Oblast are under temporary management. The owners of these facilities, who most often financed Ukrainian

military units, abandoned their property and their workforces. We found investors who took on social obligations and responsibility for the well-being of the people, preserved and increased jobs, and restored production." According to Kozenko, "now all industrial enterprises operate absolutely legally in the Zaporizhzhia Oblast and within the legal framework of the RF."



In June 2024, headquarters were created in the occupied territories to increase budget tax revenues and combat illegal employment

Due to the unsatisfactory rate of identification of "property objects and land plots not registered according to the rules of the RF, in order to take measures to ensure their registration with the state cadastral register and registration of property rights", in June 2024, headquarters were created in the occupied territories to increase tax revenues of the budget

and combat illegal employment.

The headquarters have been instructed to "ensure that an inventory of economic entities in the occupied territories that employ hired workers is carried out in order to ensure the legal employment of all employees and the legalization of wage payments."



In particular, the tasks of the headquarters include identifying and transferring to the territorial bodies of the Federal Property Management Agency and the Federal Service for State Registration, Cadastre, and Cartography information (data) on the use by economic entities, including in entrepreneurial activities, of property and land plots that are not registered according to the rules of the RF, in order to take measures to ensure their registration in the state cadastral register and registration of property rights.

## Confiscation of land and agricultural land

In June 2023, processes related to the development of a mechanism for confiscating agricultural land began in the occupied territories. In order to inventory agricultural land in the occupied territories, in November 2023, Rosreestr decided to conduct a full inventory of land plots in the temporarily occupied territories in 2024. The implementation of the federal program of the RF "Land" involves registering a specific plot of land in the cadastral register and putting it into agricultural circulation. Within the framework of the program, "local authorities will be able to determine the farmer or enterprise that will work on this land. Lands that belong to owners and companies located in unfriendly countries that finance the Armed Forces of Ukraine will be nationalized."

The Federation Council of the Federal Assembly of the RF (Federation Council) also took part in organizing the confiscation of agricultural land in the occupied territories. In October 2023, the Federation Council considered two options for transferring agricultural land, whose owners (citizens of Ukraine), left the temporarily occupied territories for management by the occupation administrations: "to expand the powers of regional authorities to manage such property or to establish restrictions on property rights in the event that the owner of agricultural land does not register the property in accordance with Russian legislation for a long time." Following the discussions, the Federation Council decided to "more thoroughly study both options."

In June 2023, the head of the occupation administration of IAF LPR reported that "we are currently resolving the issue of transferring ownerless land to the ownership of local councils with the subsequent possibility of leasing by producers, and starting next year, we will launch reimbursement of costs for putting arable land into circulation and use. The ultimate goal is 100% of cultivated land."

The same processes related to the development of mechanisms for confiscating agricultural lands were also recorded in the occupied Kherson Oblast. The head of the occupation administration of the Chaplynka raion, Oleksandr Khlyustov, said that new owners would be found for the "abandoned" agricultural lands of the Kherson Oblast. According to Khlyustov, the redistribution of agricultural lands abandoned by agricultural producers has begun in the Chaplynka raion, "thanks to the head of the Kherson Oblast administration, such a decision was made, and we are implementing it."





In August 2023, processes related to the confiscation of agricultural land began in the occupied Zaporizhzhia Oblast. The head of the occupation administration of the Zaporizhzhia Oblast stated that abandoned enterprises and farms would be transferred to the state property of the RF, and then to specific farmers within the framework of a public-private partnership. According to the head of the occupation administration, "we got a unique chance thanks to the so-called 'runners' who fled the Zaporizhzhia Oblast with the departing Ukrainian troops—these are large companies and private individuals. After their flight, a huge number of abandoned enterprises, lands, and farms were formed."

The confiscation of agricultural land was associated with the arbitrary actions of

collaborating officials and a high level of corruption, which led to numerous complaints from local residents.

Due to the large number of complaints about the confiscation of land plots, in November 2023, the head of the occupation administration of the Kherson Oblast created a working group on land management and property relations. The group was engaged in "monitoring problems in the declared areas and processing targeted appeals from citizens, developing legislative initiatives in the field of land relations and real estate, determining the list of current documents related to land and property relations." The group included heads and representatives of regional branches of Rosreestr and Roscadastr, deputies of the occupation legislative body of the Kherson Oblast.



In 2024, an inventory of land plots and agricultural lands began in the occupied territories. In the period from April 22 to June 12, 2024, the

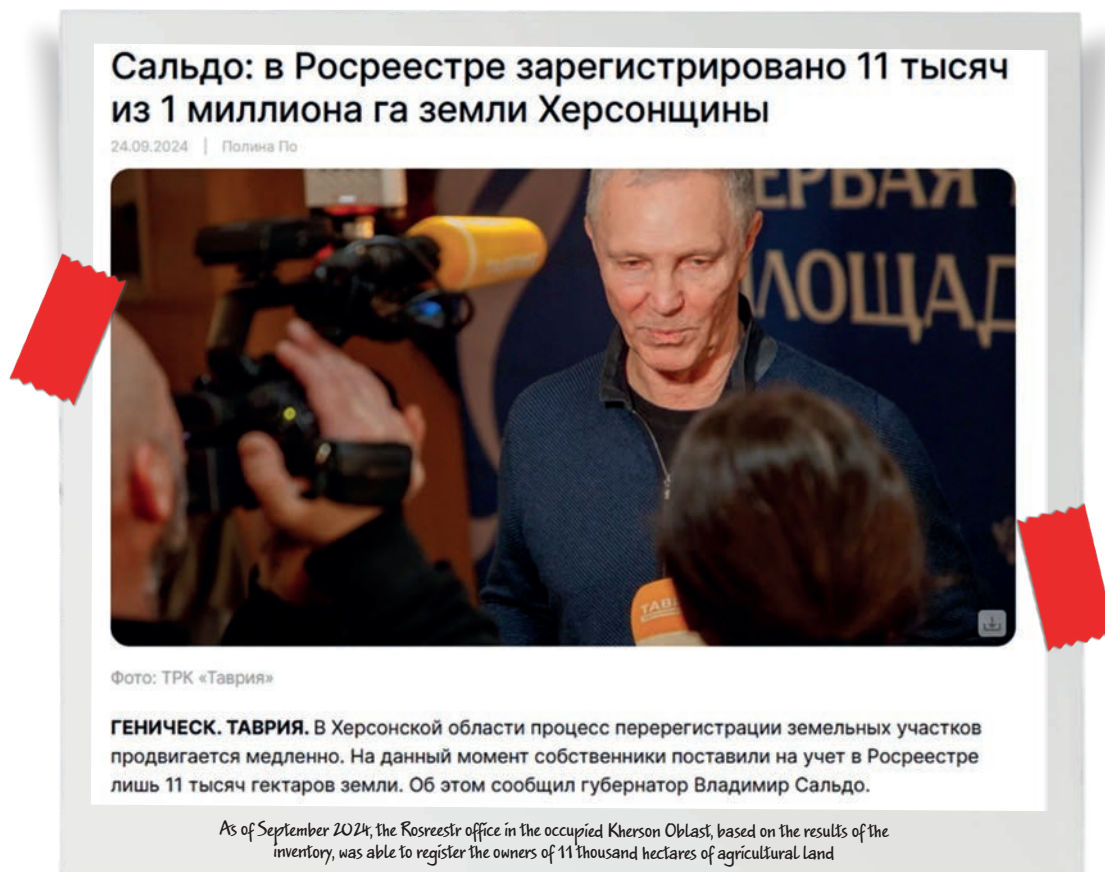
occupation ministry of property and land relations of the Zaporizhzhia Oblast carried out measures to identify the owners of previously formed land plots.

**The stated objectives of the activities are:**

- determination of the category of land and establishment of the types of permitted use of land plots located on the territory of the Zaporizhzhia Oblast;
- provision of information on previously registered land plots with established types of permitted use and land categories and on the rights holders, to the address of the Federal Service for State Registration, Cadastre, and Cartography of the RF in the Zaporizhzhia Oblast for entering information into the Unified State Register of Real Estate of the RF.

During this period, information was collected on more than 140 thousand owners of land plots in the occupied Oblast. The owners could submit documents to the occupation authorities: the ministry, local governments, and

"My Documents" centers. After processing, all accepted applications were transferred to Rosreestr to enter information on previously registered real estate objects into the Unified State Register of the RF.



As of September 2024, the Rosreestr office in the occupied Kherson Oblast, based on the results of the inventory, was able to register the owners of 11 thousand hectares of agricultural land in the occupied territory. The occupation administration reported that "owners of

agricultural land in the occupied Oblast are not showing sufficient activity in the process of registering land plots in the legal field of the RF." The Rosreestr office stated that "there are more than 1 million hectares of agricultural land in the Kherson Oblast."



Federal institutions from the RF also took part in the confiscation of agricultural land in the occupied territories. In October 2023, the Federal Agency for State Property Management of the RF assigned 30 agricultural lands and real estate

located in the occupied territories of the Luhansk and Donetsk Oblasts to the Federal State Budgetary Institution "Russian Agricultural Center" (FSBI Rosselkhoztsentr) on the basis of operational management.



The main activity of the Federal State Budgetary Institution Rosselkhoztsentr is the provision of state services in the field of plant growing, including seed production and plant protection. The institution is also the legal successor of the confiscated seed inspections, plant protection stations, and determines the sowing and varietal qualities of seeds in the occupied territories. The property provided to the Federal State Budgetary Institution Rosselkhoztsentr "will be used to organize work to preserve and improve the quality of the seed fund, and further develop agriculture."

## Confiscation of commercial real estate (shops, shopping centers, etc.)



A supermarket opened in occupied Severodonetsk on the basis of the nationalized store "ATB-Market"

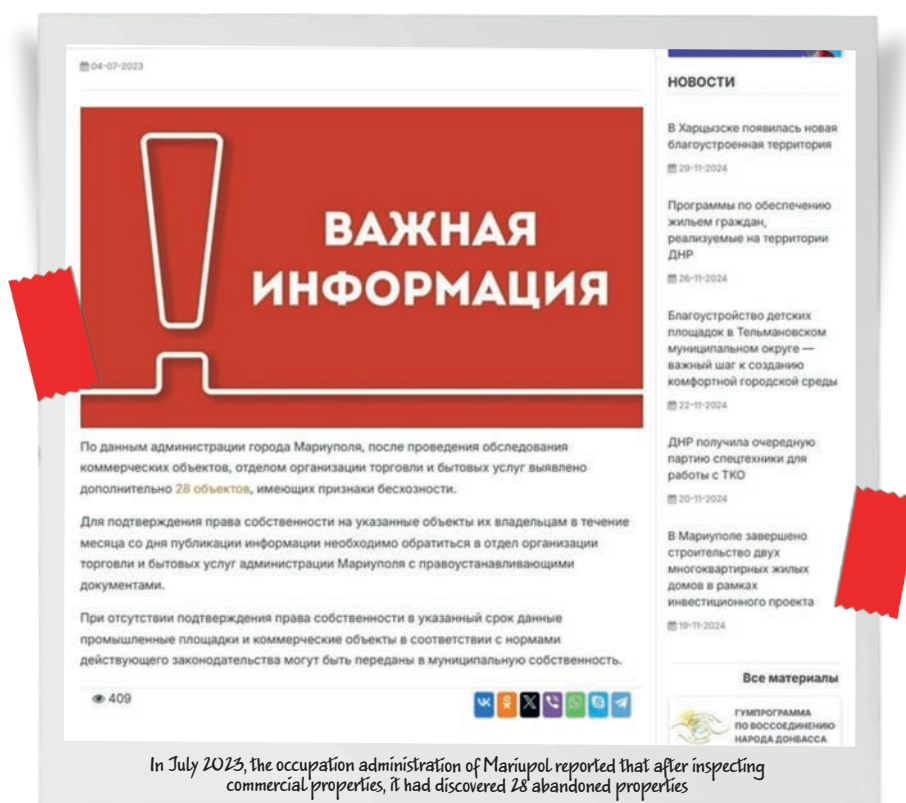
The confiscation of commercial real estate (shops, shopping centers, etc.) in the territories occupied after the start of the full-scale invasion in February 2022 took place under the guise of the occupation administrations' fight against rising prices for essential goods.

In June 2023, the occupation Ministry of Industry and Trade of IAF LPR reported that in order to reduce prices for socially significant goods, it had begun "work on the nationalization

and transfer to management of retail facilities of the former ATB supermarket chain" in the occupied cities of Severodonetsk, Lysychansk, and Rubizhne (Luhansk Oblast). Based on the results of work with the heads of the occupation administrations "to identify non-working retail facilities where the owners have withdrawn themselves", a decision was made to confiscate 10 ATB-Market stores, on the basis of which BaZar supermarkets were opened.

In October 2023, the confiscation of shops and shopping centers began in occupied Severodonetsk (Luhansk Oblast). The occupation administration demanded that "owners of retail facilities and real estate located in the city of Severodonetsk and

adjacent administrative-territorial units confirm the availability of documents of ownership. Documents should be submitted to the Severodonetsk city administration, department for consumer market issues and work with entrepreneurs, office 22."



Similar methods of confiscating commercial real estate were used in the occupied Donetsk Oblast. In July 2023, the occupation administration of Mariupol reported that after inspecting commercial properties, it had discovered 28 abandoned properties. The occupation administration reported that "owners

must submit documents establishing ownership within three months from the date of publication of the information to the Department of Trade and Consumer Services of the Mariupol Administration. If the necessary documents are not provided on time, the property will become municipal property."

## Confiscation of subsoil and mineral deposits



Also, systematic work on confiscating subsoil and mineral deposits was carried out in the temporarily occupied territories. As of November 23, 2024, the register of the Federal State Budgetary Institution "Russian Federal Geological Fund" in the occupied territories included information on 1,325 mineral deposits, in particular:

- Luhansk Oblast—478 mineral deposits
- Donetsk Oblast—684 mineral deposits
- Zaporizhzhia Oblast—140 mineral deposits
- Kherson Oblast—59 mineral deposits



A list of mineral resources in the occupied territories with the number of deposits is given in Table 7

In 2022, in the occupied Donetsk Oblast alone, 39 deposits of solid minerals were confiscated and “external management” was introduced. Of these, 15 deposits of building stone, mainly igneous rocks, which are used to restore old and build new facilities and roads.

Also, in the occupied Donetsk Oblast, there are deposits of rare earth elements—vanadium, hafnium, niobium, tantalum, titanium, and zirconium, in the development, extraction, and processing of which Russian corporations are interested.

**Table 7. List of minerals in the occupied territories with the number of deposits**

Name of minerals	Number of deposits
<b>Occupied Luhansk Oblast</b>	
Argillite	4
Gas	10
Nitrogen gas	1
Germanium	50
Gypsum	1
Clay	9
Gold	1
Limestone	13
Copper	2
Chalk	11
Marl	4
Flask	2
Sand	19
Sandstone	40
Mercury	1
Lead, zinc	4
Silver, gold	2
Slate	4
Loam	21

**Table 7. List of minerals in the occupied territories with the number of deposits**

Name of minerals	Number of deposits
<b>Occupied Luhansk Oblast</b>	
Coal	272
Coking coal	1
Uranium	1
Zinc, lead	5
<b>Occupied Donetsk Oblast</b>	
Aluminum	2
Amphibolite	1
Andesite porphyrite	1
Argillite, siltstone	3
Basalt	2
Beryllium	1
Germanium	98
Gypsum	9
Clay	33
Gneiss, slate, granite, quartzite	1
Granite	8
Granosyenite	2
Graphite	3
Dolomite	2
Iron	3
Limestone	4
Limestone (refractory materials), dolomite (refractory materials), limestone (fluxes), dolomite (fluxes)	5
Limestone, dolomitized limestone, dolomite	2
Kaolin	5
Lithium, beryllium, rubidium	1
Lithium, feldspar	1

**Table 7. List of minerals in the occupied territories with the number of deposits**

Name of minerals	Number of deposits
<b>Occupied Donetsk Oblast</b>	
Copper	13
Copper, vanadium	1
Copper, molybdenum	1
Copper, lead	1
Copper, silver	1
Chalk	18
Marl	2
Molybdenum	1
Niobium, hafnium, zirconium, titanium	1
Niobium, tantalum, zirconium	1
Flask	1
Ocher	1
Sand	37
Sandstone	10
Fluorspar	1
Rare earth metals	1
Mercury	20
Mercury, lead, zinc, copper	5
Syenite	2
Slate	6
Table salt	4
Table salt, potassium salts	1
Loam	22
Tantalum, niobium, zirconium	1
Titanium, vanadium	1
Tripoli	2
Brown coal	1



**Table 7. List of minerals in the occupied territories with the number of deposits**

Name of minerals	Number of deposits
<b>Occupied Donetsk Oblast</b>	
Coal	330
Coal, anthracite	1
Uranium	2
Phosphorus, titanium	2
Phosphorite	1
Chalcedony	2
Zirconium	2
<b>Occupied Zaporizhzhia Oblast</b>	
Aluminum	1
Gas	1
Clay	8
Gneiss	1
Granite	20
Graphite	3
Iron	23
Gold	1
Limestone	2
Kaolin	3
Quartzite	2
Manganese	2
Copper	1
Migmatite	9
Marble	1
Niobium, lithium, cesium, rubidium, tantalum	1
Flask	1
Pegmatite	1

**Table 7. List of minerals in the occupied territories with the number of deposits**

Name of minerals	Number of deposits
<b>Occupied Zaporizhzhia Oblast</b>	
Sand	11
Shell rock	1
Rare earth metals, molybdenum	1
Loam	35
Tantalum	2
Brown coal	6
Uranium	2
Porcelain	1
<b>Occupied Kherson Oblast</b>	
Gas	1
Clay	1
Gravel-sand	1
Limestone	21
Manganese	1
Sand	12
Loam	13
Loam, clay	9

## Organization of work on registration of property rights to confiscated property of legal entities-entrepreneurs from Ukraine

To organize the registration of property rights in the occupied territories, territorial bodies of the Federal Service for State Registration, Cadastre, and Cartography of the RF (Rosreestr) were created. Already on October 26, less than a month after the annexation of the occupied territories, Rosreestr reported that the creation of territorial bodies of Rosreestr and branches of the Public-Law Company "Roskadastr" had begun in the occupied territories, which carry out the registration of rights to real estate and issue

information from the Unified State Register of Real Estate of the RF (USRRE). Since January 2023, they began to exercise powers to register rights, cadastral registration, and issue information from the USRRE, cadastral works.

Just a year later, in November 2023, 1,439 employees were hired by the territorial offices of Rosreestr in the occupied territories, and 637 of them underwent advanced training according to the agency's standards, 190 people passed the exam to become a state registrar.



The Rosreestr budget for the period 2024-2027 allocated 8.2 billion rubles for measures to organize real estate registration, create geodetic network points, and conduct cartographic work, a full inventory of property and comprehensive cadastral work in the temporarily occupied territories.

In the summer of 2023, the Rosreestr administration held two major meetings in the occupied territories, the purpose of which was to accelerate the delineation of property rights between the RF, the occupation administrations and its municipalities, as well as procedures related to the confiscation of property of Ukrainian legal entities.

The meetings discussed activities related to the systematization and cataloguing of real estate located in the occupied territories. In particular, a meeting was held on the transfer of information about previously registered real estate objects to the Unified State Register of

Real Estate, state land monitoring, comprehensive cadastral work, the creation of a state catalog of geographical names, and the implementation of information, telecommunications, and service activities. The key tasks that were set before the Rosreestr bodies in the occupied territories were the transfer of real estate archives to electronic form, "which will allow for a comprehensive solution to the issue of storing, structuring, and systematizing data on such property, and the implementation of comprehensive cadastral work, which will help reduce the number of land disputes."



An important topic of the meetings was the discussion of problems related to the specifics of management and disposal of individual property objects located in the occupied territories and "the development of interaction steps to speed up the registration of demarcated state property."

## Information on the number of registration actions with real estate objects in the temporarily occupied territories:

- June 2023** ● Since the beginning of 2023, Rosreestr divisions have carried out more than 35 thousand registration actions with real estate objects in the temporarily occupied territories;
- October 2023** ● Rosreestr reported that “about 4.5 million real estate objects in the Donetsk and Luhansk People’s Republics, Kherson, and Zaporizhzhia Oblasts constitute the economic base for development but the full register is to be formed by 2030”;
- December 2023** ● Since the beginning of January 2023, Rosreestr has carried out over 300 thousand registration actions in the temporarily occupied territories;
- July 2024** ● Rosreestr registered the right of public ownership of more than 28 thousand real estate objects in the occupied territory of Luhansk Oblast. Of these, more than 16 thousand objects belong to federal bodies of the RF, more than 5 thousand were transferred to the management of the occupation administration, and about 7 thousand—to occupation municipalities;
- September 2024** ● Rosreestr reported that “to date, 1.3 million objects in new territories have already been entered into the register.” Electronic interaction with professional market participants, including notaries, has been ensured;
- September 2024** ● Rosreestr in the occupied Kherson Oblast entered cadastral data on 42 thousand real estate objects;
- October 2024** ● Rosreestr began work on a large-scale inventory of real estate in the occupied Luhansk Oblast, which involves conducting a survey of the territory and analyzing documents confirming property rights to real estate. By the end of this year, 100 thousand real estate objects will be surveyed;
- October 2024** ● October 2024—Rosreestr in the occupied Zaporizhzhia Oblast began a large-scale inventory of real estate. As part of this project, territory surveys and analysis of documents confirming property rights to real estate will be carried out;



- November 2024** ● Rosreestr in the occupied Donetsk Oblast reported that “today there are 3.5 million objects in IAF DPR, almost a third of which are land plots. To date, more than 800 thousand such real estate objects have been registered”;
- November 2024** ● Rosreestr in the occupied Kherson Oblast has begun a comprehensive inventory of land plots and real estate. A special headquarters has been created in the occupied Oblast, which includes representatives of the relevant occupation authorities. The headquarters' work is carried out in three stages. The first stage involves a study of archives, the second stage involves a study of the issue of aerial photography, and the third stage involves going out, visiting real estate objects, and talking to owners. "A comprehensive inventory is planned until the end of the year and beyond. This is the identification of land plots and buildings in order to make it easier for citizens to resolve issues of cadastral registration and registering their rights in the Russian legislative field," said Vasily Romanov, head of the Rosreestr office in the occupied Kherson Oblast;
- November 2024** ● Rosreestr reported that "in order to activate the filling of the Unified State Register of Real Estate with information about real estate objects, taking into account the instructions of the President of Russia and the Government of the RF, an interdepartmental roadmap for 2024-2026 has been developed, within the framework of which work will be carried out on the inventory of real estate objects for the purpose of subsequent entry of information about them into the Unified State Register of Real Estate (more than 5.5 million objects), including information about identified copyright holders, about public lands, and about vacant lands for the purpose of involving them in circulation."

In September 2024, the Rosreestr bodies in the occupied territories were tasked with "promptly conducting an inventory of real estate located in the new territories." Based on the results of the inventory, all "ownerless" real estate will be put up for sale to investors from the RF.

By the order of the Government of the RF dated September 14, 2024, No. 2525-r, Rosreestr was allocated budgetary appropriations in the amount of 314,759.4 thousand rubles in 2024 for the purpose of transferring to the **"Unified State Register of Real Estate information on previously registered real estate objects located in the Donetsk People's Republic, Luhansk People's Republic, Zaporizhzhia Oblast, and Kherson Oblast, acquiring space images in relation to the territories of the**

**specified subjects of the RF, with a view to performing in 2024 work on the formation of data on at least 327,198 real estate objects previously registered in the territories of the Donetsk People's Republic, Luhansk People's Republic, Zaporizhzhia Oblast, and Kherson Oblast."**

By March 1, 2025, Rosreestr must "promptly conduct an inventory of real estate located in the new territories, which will fill the Unified State Register of Real Estate of the RF with complete and accurate information about real estate objects. The inventory work is aimed at creating conditions for citizens and legal entities to register their rights to capital construction projects and land plots, as well as forming an open real estate database for investors."





# Conclusion

Based on the analysis of the presented material, the following conclusions can be drawn.

In the occupied territories of Ukraine, illegally created governing bodies carry out complete confiscation of movable and immovable property of citizens who have left these territories. The main goal of such actions is the complete alienation of citizens from their material support in the said territories, which is a form of sanction influence and punishment for supporting the Ukrainian-centric vector of development chosen by families who have left the occupied Oblasts.

The Russian occupation authorities use various mechanisms to seize residential property in the occupied territories of Ukraine. The main mechanisms for seizing property are legal registration as "ownerless property" (property is declared "ownerless" if there is no: payment for utilities for more than a year; registration of the

property in the Russian real estate registry; use of the housing for a certain period of time). This process is implemented through the occupation courts but often without the participation or notification of the owners. In addition, the authorities can hinder re-registration, namely: refuse to register property under a power of attorney issued outside the occupied territories; require the personal presence of all owners to submit documents to local MFCs.

There are known private cases of physical seizure of housing, namely: forced resettlement of Russian citizens into abandoned apartments; use of apartments to house Russian military personnel or loyal local residents; programs to stimulate resettlement (occupation authorities provide preferential mortgage loans to Russians for resettlement to captured territories, facilitating the replacement of the local population).



The consequences of such actions are social displacement in the form of systemic confiscation of real estate, which contributes to demographic changes aimed at increasing the number of people loyal to Russia in the captured territories. Also, the loss of civil rights, since Ukrainian citizens are deprived of the opportunity to protect their rights to housing, which undermines their right to private property. The loss of housing for many is a blow to their identity, history, and stability.

Such actions violate the Fourth Geneva Convention, which prohibits the confiscation of private property in conflict zones. These measures may be qualified as war crimes. The international community should pay particular attention to these cases and take appropriate measures. In order to protect the rights of Ukrainian citizens, it is important to continue documenting violations and providing support to victims through international and human rights organizations.

Between 2014 and 2021, the Kremlin operated without a clear strategy for managing industrial enterprises in the occupied territories

of Luhansk and Donetsk Oblasts. The initial solution was to transfer these enterprises to the control of Yanukovich-era oligarchs, in particular, the Vneshtorgservis Company associated with Serhiy Kurchenko. However, the results of this structure's activities led to a socio-economic crisis: accumulation of debts, "hunger riots" in 2020, and forced recruitment of workers to participate in military actions against Ukraine. In 2021, the enterprises were "transitioned" to the control of Kremlin-affiliated structures, which ensured more centralized management and facilitated the implementation of new plans for the occupied territories.

Following the social unrest in 2020, Russia radically changed its approach to industrial management in the occupied territories, introducing strict controls. Reorganization, corporatization, and the creation of vertically integrated companies that pooled profitable assets were carried out. Social obligations were formally transferred to the occupation administrations, and unprofitable enterprises were liquidated along with staff reductions. This created the preconditions for a large-scale confiscation of property and resources before the start of a full-scale invasion in 2022, allowing the Kremlin to establish full control over strategic industries in the occupied territories and create mechanisms for the further use of seized assets.

In 2014–2015, the occupation administrations of the so-called IAF DPR and IAF LPR adopted “resolutions” that formally established the mechanisms for introducing “temporary

administrations” to manage enterprises, institutions, and organizations owned by Ukrainian citizens and legal entities. These documents provided the legal basis for the confiscation of property, in particular, in the coal mining, metallurgy, and energy industries, which constituted the greatest economic value in the occupied territories.

In March 2017, the occupation administrations introduced external management at 46 enterprises owned by Ukrainian citizens. This decision was justified by the need to overcome the consequences of the trade blockade by Ukraine. Despite statements that this was not nationalization, such actions actually meant the transfer of control over assets to structures controlled by the Kremlin. In particular, enterprises such as Krasnodonugol, DTEK Rovenkianthracite, DTEK Sverdlovanthracite and others were transferred to the management of Vneshtorgservis.



The transfer of control over the most profitable enterprises by the occupation administrations allowed the Kremlin to use these assets for economic gain, while simultaneously integrating them into vertically integrated structures that worked in favor of the RF. These actions increased the economic dependence of the occupied territories from the RF and created the preconditions for the further exploitation of their resources.

As a result of external control in the occupied territories of Luhansk and Donetsk Oblasts, Russia has achieved significant control over strategically important industries, in particular, metallurgy, coal, and energy industries. The creation and transfer of companies under the control of Russian companies, such as the Southern Mining and Metallurgical Complex and the Republican Fuel Company Vostokugol, made it possible to concentrate resources on the main production capacities. At the same time, the reorganization of enterprises, the liquidation of unprofitable units and the rehabilitation of economically efficient ones were carried out, which helped to achieve significant financial results, in particular, for UGMK, where the net profit for 2023 amounted to 6.7 billion rubles.

In parallel with these measures, unprofitable mines were liquidated in the occupied Oblasts and production capacities were concentrated within state unitary enterprises, such as Energy of Donbas, which meets the needs for electricity in the occupied territories. All these measures, including job cuts and the transfer of social facilities under the control of the occupation administrations, pursued the goal of not only efficient management of enterprises but also the most profitable use of resources for Russia's economic and military purposes. Such measures by the occupation administrations were aimed at the full integration of economically significant assets of the occupied territories into structures controlled by Russia, which significantly affected the economic situation in the Oblast.

Such activities were supported by legal acts that granted powers to the occupation authorities. According to the decree of the government of the RF, the process of managing and distributing property in the occupied territories of Ukraine is carried out through the creation of special mechanisms and structures, such as the Public-Law Company "Fund of development of territories" (PPC "FDT") and the Federal Agency for Management of State Property of the RF. The main changes include the transfer of property of strategic importance for the defense of the country to management, as well as the provision of Russian companies with the opportunity to use resources in these territories without holding auctions. Thus, strict control is established over the rights to natural resources, residential real estate, as well as enterprises owned by Ukrainian legal entities and citizens.

Further steps by the Russian government to confiscate and transfer the property of Ukrainian citizens and Ukrainian enterprises include a number of regulations allowing direct disposal of these resources belonging to legal entities and citizens of Ukraine. Such actions include both the processes of transferring the right to exploit natural resources and the mechanism of leasing or selling property located in the occupied territories. In addition, the Russian government provides exclusive rights to the PPC "FDT" to lease or sell property aimed at integrating the occupied territories into the Russian economy and

improving the socio-economic situation in these lands.

In the course of the reorganization and redistribution of property rights in the occupied territories of Ukraine, the PPC "FDT" plays a key role. This structure, created by a decree of the Government of the RF in 2017, is engaged in the management of movable and immovable property that came under the control of the RF. In particular, PPC "FDT" is engaged in the leasing, sale, and redistribution of property belonging to citizens of Ukraine and Ukrainian enterprises in these territories. PPC "FDT" operates under the leadership of high-profile officials such as Marat Khusnullin, Deputy Prime Minister of the RF, and Irek Fayzullin, Minister of Construction, Housing, and Utilities of the RF, who work in close cooperation with Prime Minister Mikhail Mishustin.

The Chairman of the Supervisory Board of the PPC "FDT" is Marat Khusnullin, and Irek Fayzullin is also a member of this board, which emphasizes their key influence on the processes of management and redistribution of property in the occupied territories. Ilshat Shagiakhmetov, who has experience in government structures related to land and property issues, was appointed General Director of the company. Shagiakhmetov held important positions related to the management of state property and infrastructure development, which allows him to effectively coordinate processes related to the disposal of confiscated property.



In addition, all decisions regarding the transfer and disposal of property in these territories are within the exclusive competence of the PPC "FDT", which strengthens the control of the Russian authorities over economic and infrastructural resources in the Oblast.

Following the annexation of the occupied territories in Ukraine, the RF began systematic work to confiscate property belonging to Ukrainian legal entities. In October 2022, a commission was created that worked in accordance with the order of the Russian government No. 542-r, with the aim of

"transferring non-functioning and abandoned enterprises to external management" in IAF DPR, LPR, as well as the Kherson, and Zaporizhzhia Oblasts. The commission was headed by Marat Khusnullin, Deputy Prime Minister of the Russian government, and his deputy was the Minister of Construction, Housing, and Utilities Irek Fayzullin.

The commission was given the authority to pre-approve property lists for delimitation, approve lease agreements, establish rules for conducting tenders, and select administrations for external management of industrial enterprises. It was stated that in the Donetsk and

Luhansk People's Republics, as well as in the Kherson and Zaporizhzhia Oblasts, there are about 4.5 million real estate objects that can become the economic basis for development, although the full register is planned to be completed by 2030.



A mechanism was developed for the confiscation and redistribution of property, which transferred the authority to lease property in the occupied territories to the exclusive competence of the PPC "FDT". This mechanism concerned all objects, with the exception of residential real estate, and provided for a simplified procedure for registering property based on a declaration, followed by inventory and cadastral work. All objects, including industrial enterprises, land plots, commercial real estate, and warehouse complexes, had to undergo a re-registration procedure through the PPC "FDT".

In order to lease property, the applicant must submit an application to the PPC "FDT" and provide documents confirming four key performance indicators, such as investment volume, number of employees, turnover, and taxable base. After evaluating the application, the PPC "FDT" will coordinate it with the Ministry of Construction, Housing, and Utilities, and if approved, the applicant is granted priority rights to lease and subsequently buy out the property. If the applicant fails to meet key performance indicators or violates tax reporting, the PPC "FDT" has the right to terminate the lease agreement early. Thus, the process of confiscation and redistribution of property in the occupied territories includes strict regulation through the PPC "FDT", which ensures control over economic activity in these territories, as well as the sale of confiscated property.

In January 2024, two large enterprises, PJSC Berdyansk Zhatki and PJSC Azov Lubricants and Oils, located in the occupied territories of the Zaporizhzhia Oblast, were transferred to the state operator State Unitary Enterprise "Zaporizhzhia Oblast Development Corporation". The reason for the transfer was the "unscrupulous management of the previous administrator". The occupation administration stated that the key tasks of the State Unitary Enterprise are to restore the work of these enterprises, attract investors with state

participation, conduct an inventory of property, and pay off wage arrears.

As of October 2023, 122 enterprises owned by Ukrainian legal entities had been confiscated and placed under "external management" in the Zaporizhzhia Oblast. Deputy Prime Minister of the occupation government Andriy Kozenko said that many of these enterprises had been abandoned by Ukrainian owners, often due to their connection to military actions, and that new investors had taken on the responsibility of restoring production and preserving jobs. Kozenko noted that all enterprises in the region now operate within the legal framework of the RF.

However, in June 2024, headquarters were created in the occupied territories to increase tax revenues and combat illegal employment, after insufficient progress was identified in registering property and land that did not comply with Russian regulations. The main task of the headquarters was to ensure the legalization of employment of workers and the registration of rights to real estate and land that had not previously been entered into the state cadastre. The headquarters were also instructed to identify and transfer to the Federal Property Management Agency and Rosreestr data on economic entities using such objects for the purpose of registering them and officially registering property rights.

Since June 2023, processes related to the confiscation of agricultural land have begun in the occupied territories of Ukraine. As part of these processes, Rosreestr in November 2023 decided to conduct a full inventory of land plots in 2024 in the occupied territories, with the aim of registering the lands in the cadastral register and

involving them in agricultural circulation through the federal program "Land". This program implies that local authorities will be able to lease land to farmers or enterprises while the lands belonging to Ukrainian owners who financed the Armed Forces of Ukraine will be nationalized.



**The Federation Council of Russia also took part in developing mechanisms for confiscating agricultural land, discussing two options for managing it: expanding the powers of regional authorities or establishing restrictions on property rights if the owner does not register his lands under Russian law for a long time.**

The confiscation processes affected the occupied areas of the Kherson, Zaporizhzhia, and Luhansk Oblasts. In the Kherson Oblast, for example, the redistribution of abandoned farmland was initiated, and in the Zaporizhzhia Oblast, the transfer of ownerless land to state ownership began, with the subsequent possibility of leasing by farmers within the framework of a public-private partnership. In these Oblasts, a working body was also created to monitor land relations and resolve complaints from local residents about the arbitrariness of officials.

In 2024, the inventory of land plots continued in the occupied territories. For example, in the Zaporizhzhia Oblast, more than 140 thousand land owners were registered, and in the Kherson Oblast, 11 thousand hectares of agricultural land were registered. However, despite these efforts, local land owners are not active enough in registering their plots.

In October 2023, the Federal Agency for State Property Management of Russia transferred 30 agricultural land and real estate objects in the Luhansk and Donetsk Oblasts to the management of the Federal State Budgetary Institution "Russian Agricultural Center" (FSBI Rosselkhoztsentr). This institution is engaged in maintaining the quality of the seed fund and developing agriculture in the occupied territories.

The processes of thematization and cataloguing of real estate in the occupied territories are key tasks for creating a full-fledged register of real estate

objects. In 2024, Rosreestr is actively engaged in the inventory of lands and objects, with the aim of transferring information about previously registered real estate objects to the Unified State Register of Real Estate (USRRE) of the RF. Important aspects of this process have become measures to create state catalogs of geographical names, as well as comprehensive cadastral works and electronic transfer of archives, which will systematize data on real estate and speed up its registration. Also, significant attention is paid to land monitoring, identifying ownerless objects, and simplifying the processes of their registration, which helps resolve problems of land disputes and improve real estate management in the occupied territories.

During 2023 and 2024, Rosreestr carried out more than 300 thousand registration actions with real estate objects in the occupied Oblasts, including Donetsk, Luhansk, Zaporizhzhia, and Kherson Oblasts. As part of the inventory and registration of property in the occupied territories, interdepartmental work is actively used and funds from the federal budget have been attracted to speed up the process. An important stage is the development of an interdepartmental roadmap for 2024-2026, aimed at inventorying more than 5.5 million real estate objects. Inventory work also includes aerial photography and on-site inspection of objects. Ultimately, all abandoned objects will be put up for sale to investors from Russia, which is aimed at activating economic activity in the new territories.



The issue of confiscation of residential premises in the occupied territories and their subsequent distribution has become an important part of legal regulation in these territories. In 2024, several regulations were adopted governing the use of residential premises with signs of ownerless property located in the Luhansk, Zaporizhzhia, and Kherson Oblasts. In particular, legislative acts such as Law of the Luhansk People's Republic No. 29 and the Resolution of the Government of the Kherson Oblast established the procedure for identifying and using such objects, which made it possible to effectively conduct an inventory of residential premises left without owners. This process also concerns the regulation of property rights and the identification of objects that can be used for the needs of the occupation authorities.

As part of the confiscation of residential properties, priority in their provision was given to representatives of the RF's security forces located in the occupied territories. In particular, according to amendments to the legislation of the Luhansk People's Republic adopted on June 28, 2024, confiscated residential premises are provided first of all to employees of the Russian security ministries and services, including the Ministry of Defense, the Ministry of Internal Affairs, the FSB, and other bodies. This regulation is aimed at meeting the needs of the occupation authorities and security forces, which also leads to a change in the legal status of real estate in these territories and their consolidation in the

state ownership of the RF.

The confiscation of residential premises and problems with property registration in the occupied territories of Donetsk and Luhansk Oblasts have caused mass protests and complaints from local residents. In the Donetsk Oblast, since 2023, local residents have been massively denied real estate registration based on the resolution of the Main Defense Committee No. 341 of September 29, 2022. This document, the text of which was not published, imposed an arrest and a ban on registration actions in relation to residential buildings and apartments, which affected about 300 thousand people. Following numerous complaints and protests, decree No. 307 was signed in July 2024, which was supposed to resolve the problem with the suspended registration of property rights to housing but the situation remained tense.

In the Luhansk Oblast, similar problems with property confiscation led to mass complaints from local residents who claimed that their homes had been illegally taken away. Deputies of IAF LPR's People's Council and representatives of the United Russia party organized a working meeting to discuss the problems associated with the improper application of the law on municipal property. Alexey Beletsky, chairman of IAF LPR's People's Council Committee, admitted that there was a misunderstanding in the process of applying this law, and many norms were interpreted incorrectly, which caused discontent among local residents.



In addition, Russia has tightened measures to restrict entry of Ukrainian citizens and introduced additional control procedures aimed at identifying and tracking the purposes of Ukrainian citizens' trips to Russia. Such measures are related to the geopolitical situation, increasing control over the temporarily occupied territories, as well as Russia's desire to minimize the influence of Ukraine and the international community on these territories. Entry for Ukrainian citizens through Russian territory has been restricted since October 2023, with the exception of Sheremetyevo and the checkpoint in the Pskov Oblast. At the same time, strict filtering measures are applied, including fingerprinting and checking of electronic devices. In October 2024, Rosreestr in the occupied territories stopped accepting documents from foreign citizens, which effectively prevents Ukrainian citizens from registering or confirming their ownership of real estate.

Based on the data on registered IDPs, it can be estimated that 856,499 properties in the occupied territories are at risk of confiscation. This indicates a systemic policy of revising property rights in favor of persons loyal to the Russian authorities.

Data on the significant reduction in the number of migration flows between Russia and Ukraine shows that Russia is not only restricting the entry of Ukrainian citizens but also deporting those who try to enter the country.

Based on the totality of measures taken by the occupation authorities, the following consequences are possible: loss of property rights by Ukrainian citizens to a significant portion of real estate in the occupied Oblasts; increased social and economic pressure on IDPs; deepening of the humanitarian crisis in the conflict zone. These measures are part of the strategy of strengthening Russia's control over the

temporarily occupied territories and may significantly affect the process of their possible reintegration into Ukraine in the future.

The facts presented confirm a large-scale and systematic policy of property confiscation in the temporarily occupied territories of Ukraine. The occupation administrations, headed by Russian citizens and local collaborators, act according to centralized instructions aimed at redistributing property in favor of the RF and its citizens.

In the occupied territories, "ministries" and specialized departments have been created, such as: "The Ministry of Property and Land Relations of the Kherson Oblast" headed by Russian citizen Elena Pekova. Similar structures are in Donetsk, Luhansk, and Zaporizhzhia Oblast, headed by citizens of the RF. The Russian Federal Registration Service is actively integrated into this process to create the appearance of "legitimacy".



The seized real estate objects are subject to the "decrees" of the occupation administrations, such as the decree No. 25-PP in the Kherson Oblast. These "documents" establish the mechanisms for seizing the identified "ownerless" objects, notifying the owners with strict requirements to provide supporting documents, confiscating the objects through the occupation courts or transferring them to municipal or state ownership.

Thus, apartments and houses whose owners have left the occupied territories become a priority target. For example, Oleksandr Nagai in Kakhovka organizes raids on apartments to "check" the condition of the property. In addition, shops, religious buildings, recreation centers, and boarding houses, as shown by the examples of objects in Melitopol, Donetsk, and other cities, as well as sanatoriums, recreation centers, and unfinished construction projects such as "Motors" and "Metallurg" become objects of confiscation.

To ensure an effective confiscation process, the occupation authorities use a system of pressure and intimidation (threat of confiscation of property, prohibition of registration of real estate without Russian

citizenship, forced settlement of new residents—often Russian military personnel—into apartments). As practice shows, confiscated property is used to resettle Russians who are given preferential mortgage loans at 2% for re-settlers from Russia or are given "housing certificates" to collaborators as an incentive.

As a result, owners have no opportunity to protect their rights, and the confiscation process is accompanied by violations of basic human rights. Programs to stimulate the resettlement of Russians to the captured territories lead to a change in the ethnic and social composition. The loss of commercial and residential real estate undermines the economic base of the Oblasts, which will complicate recovery.

Such actions by the occupation authorities are in flagrant violation of the Fourth Geneva Convention (Article 53 prohibits the seizure of private property in occupied territories) and the Rome Statute of the International Criminal Court (such actions are classified as war crimes). These actions are not only illegal but also immoral, as they undermine the rights of citizens and create precedents for mass loss of property. Support for victims and international pressure are key steps to combat this practice.

The information provided shows how the Russian occupation policy in the temporarily captured territories of Ukraine is developing and deepening, based on a complex system of suppression, economic exploitation, and forced integration into the Russian legal and social space. Namely, the creation of unbearable conditions for the disloyal population, forced exchange of documents, refusal to provide administrative services without a Russian passport, arrests, disappearances, interrogations, and filtration camps, complete blocking of independent media, aggressive propaganda, and

manipulation of facts. These measures create an atmosphere of fear that forces disloyal citizens to leave the territory, which reduces the likelihood of resistance.

In addition, processes of confiscation are actively taking place, such as fictitious nationalization, often disguised as "registration of ownerless property". Fictitious mechanisms for recording and transferring property are being created in the interests of the Russian administration. The forced introduction of the Russian language and historical narrative distorts Ukrainian identity. These measures are aimed at the complete erasure of Ukrainian identity and assimilation of the population.

An important direction is the resettlement of Russians through programs to stimulate migration with the help of preferential mortgage loans, high salaries, and housing. Military towns and bases are becoming centers for the Russian population, facilitating further militarization of the Oblasts. The main goal of the occupation authorities is to change the ethnic and political balance in favor of the population loyal to Russia.



The Russian occupation policy is aimed at long-term annexation of territories. These actions require active intervention of the international community to prevent further violations and protect the rights of Ukrainian citizens.

# About the authors

**PAVLO LYSIANSKY**

Doctor of Philosophy in Political Science, Director of the Institute for Strategic and Security Studies, laureate of the German-French Prize for the Defense of Human Rights and the Rule of Law

**VIRA YASTREBOVA**

Lawyer and human rights activist, Director of the human rights organization "Eastern Human Rights Group", Adviser to the parliamentary committee of the Verkhovna Rada of Ukraine on human rights and de-occupation of temporarily occupied territories

**JULIA ZAVHORODNIA**

Candidate of political sciences, expert of the Institute of Strategic Studies and Security

**MAXIM BUTCHENKO**

writer, journalist, and public figure, Deputy Director of the Institute for Strategic Research and Security

**VALENTINA TROYAN**

journalist, nutrition media expert



[East.hr.group@gmail.com](mailto:East.hr.group@gmail.com)



[t.me/eastgroup](https://t.me/eastgroup)



[facebook.com/east.hr.group](https://facebook.com/east.hr.group)