

# PREVENTING AND COMBATING CORRUPTION IN UKRAINE

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## STATE ANTI-CORRUPTION POLICY

**The Government of Ukraine has approved three anti-corruption draft laws.** These include [#14035](#) “On Amendments to Certain Laws of Ukraine Regarding Optimization of the Special Verification Procedure During Martial Law in Ukraine”, which aims to optimize the procedure for special verification of officials by the National Agency on Corruption Prevention (NACP). If an official transfers to another position within the same office and has already undergone a special verification, a repeated verification will not be conducted.

In addition, the government approved draft law [#14033](#) “On Amendments to the Civil Procedure Code of Ukraine and the Code of Administrative Procedure of Ukraine Regarding Improving the Procedure for Case Consideration by the High Anti-Corruption Court (HACC)”. In particular, the bill envisages the possibility for civil confiscation cases to be considered by an individual HACC judge or collectively by a panel of three judges of this court. This is intended to accelerate court proceedings.

The third draft law approved by the Government is [#14034](#) “On Amendments to the Code of Ukraine on Administrative Offenses and the Criminal Procedure Code of Ukraine Regarding the Sending of Copies of Court Decisions in Cases of Corruption and Corruption-Related Offenses”, which aims to ensure the inevitability of legal responsibility for committing corruption offenses. It specifically establishes the obligation of courts to send electronic copies of decisions in corruption cases to the leadership of state authorities for prompt response.

These initiatives are part of the [Anti-Corruption Strategy for 2021-2025](#) and the [State Anti-Corruption Program until 2025](#).

**The Parliament of Ukraine has adopted a Law establishing the Specialized District Administrative Court (SDAC) and the Specialized Appellate Administrative Court (SAAC),** whose purpose is to facilitate impartial consideration of cases concerning state authorities, adherence to the principle of access to justice, and implementation of Ukraine's European integration course. The newly established courts will be located in Kyiv, and their jurisdiction will cover the entire territory of Ukraine. SDAC and SAAC are intended to replace the liquidated District Administrative Court of Kyiv, which is one of the conditions of the International Monetary Fund (IMF) for continued financing.

## DIGITAL TRANSFORMATION

**In August, DOZORRO helped the state save almost UAH 45M** by identifying violations in procurement and filing subsequent appeals to customers and law enforcement agencies. The monitoring portal team analyzed 69 procurements with a total expected value of over UAH 5B and found violations in 56 of them. Typical violations included inflated prices for construction materials, such as UAH 5.8M in overpayment for construction of a protective structure at Velykooleksandrivska School No. 2 in Kherson region; an overcharge of UAH 5.7M during school construction in the village of Chaiky in Kyiv region; and UAH 2.2M in overpayment for construction of a bomb shelter for Vysokopilsky Lyceum in Kherson region. The monitoring portal team also identified discriminatory requirements for tender participants that limited competition and errors in tender documentation. In total, since the beginning of the year, DOZORRO has helped the state save close to UAH 679M.

## WORK OF THE ANTI-CORRUPTION SYSTEM

**Over UAH 18M will be recovered from officials through civil confiscation following the NACP's declaration audit.** The Specialized Anti-Corruption Prosecutor's Office (SAPO) has filed several lawsuits with the HACC to recover assets to state revenue, based on materials from the NACP, as well as their own evidence and evidence collected jointly with the National Anti-Corruption Bureau of Ukraine (NABU). The lawsuits concern assets of high-ranking officials acquired without confirmed sources of income. In particular, UAH 3.2M will be **recovered** from the Chief Sanitary Doctor; **more than UAH 8M** – from the Head of the State Environmental Inspection of Donetsk region; and **more than UAH 7M** – from the former head of the Darnytsia District State Administration of Kyiv. The court has already frozen these assets for further civil confiscation.

**Land scheme in Zakarpattia – defendant in criminal proceeding extradited from Germany.** The case involves an appraiser who in 2024, in collusion with other individuals, forged a monetary valuation report for a land plot of over 3 hectares. The land was artificially undervalued, causing damage to the local community amounting to UAH 81.7M. The defendant was detained in Germany in winter 2024, and was recently handed over to Ukrainian law enforcement officers at the "Krakovets – Korczowa" checkpoint. The extradition was made possible thanks to international cooperation between Germany, Poland, Interpol, and the Prosecutor General's Office.

**NABU closes case against manufacturer of thermal scopes Archer.** The investigation has not uncovered sufficient evidence to indicate that officials from the Ministry of Defense or representatives of Archer had committed any criminal offense. The NABU highlighted that not all suspicions result in formal charges; however, these investigations help enhance the efficiency of the law enforcement system. The investigation was launched in 2023 following financial monitoring reports received from a European Union member state. At that time, NABU detectives **conducted searches** at the offices and residences of Archer employees due to suspicions of potential embezzlement amounting to nearly UAH 200M in relation to

defense contracts valued at approximately UAH 1.5B, as well as delays in delivering equipment to the Armed Forces of Ukraine.

## MEDIA ABOUT CORRUPTION

**“Will declarations lead to accountability?”** In a column for the Ukrainian sociopolitical media outlet Liga.net, Oleksandr Kalitenko, legal advisor at Transparency International Ukraine, [analyzed](#) the recently signed draft law #13271-1 aimed at strengthening liability for corruption offenses. He argues that the law retains significant weaknesses in Ukraine’s anti-corruption system. Specifically, the thresholds for criminal liability and civil confiscation remain excessively high, allowing public officials to evade punishment for substantial assets of questionable origin. Kalitenko emphasizes that unless these thresholds are lowered and genuine accountability is established, the law will only simulate anti-corruption action while shielding officials from any real liability.

**“Most Ukrainians view competition between state institutions as harmful to the country’s development”**, according to the [recent survey](#) conducted by Active Group. Over 70% of respondents believe that conflicts between state institutions negatively impact progress, while 30% think that such competition either does not exist or is hardly noticeable. The survey also assessed public trust in anti-corruption agencies. Findings show that 20.4% of Ukrainians trust the National Anti-Corruption Bureau of Ukraine (NABU), followed by 13.0% who trust the Specialized Anti-Corruption Prosecutor’s Office (SAPO). Trust levels are lower for the State Bureau of Investigation (SBI) at 12.1% and the National Agency on Corruption Prevention (NACP) at 9.3%. Additionally, 24.1% of respondents indicated that they do not trust any institutions.

**“HACC plea deals: effective compromise or indulgence to corrupt officials?”** In a [column](#) for the Ukrainian sociopolitical media outlet “Dzerkalo Tyzhnia”, Yevhen Krapyvin, Head of the “Law and Order” Program at the Laboratory of Legislative Initiatives, argues that the plea deal mechanism at the HACC helps expedite judicial proceedings and improves the efficiency of prosecuting corrupt officials. However, this practice often generates public skepticism, as it is frequently viewed as a way to “buy one’s way out” of punishment. Krapyvin emphasizes that plea deals do not mean escaping punishment; rather, they serve as a tool to ensure that punishment is inevitable for a broader range of perpetrators. This mechanism enables detectives and prosecutors to focus their efforts on other, often more complex and high-profile cases. He also draws comparisons with international practices, where plea deals are widely utilized and seen as effective. For instance, in the United States, 95–99% of criminal cases are resolved through plea bargains; in the United Kingdom, the figure is around 70%; and in EU countries, the average exceeds 50%. In Ukraine, nearly half of the HACC’s verdicts are delivered through plea deals. However, according to Krapyvin, without proper public communication and explanation, this tool will continue to face mistrust.

**“Revenge for Mindich: Who is NABU detective Magamedrasulov and why is the Presidential Office so afraid of him?”** Journalists from the YouTube project "Ye Pytannia" [have compiled](#) a full timeline of events in the case of NABU detective Ruslan Mahomedrasulov and his father, both of whom have been accused by the Security Service of Ukraine (SSU) of aiding the aggressor state. The allegations center around supposed plans to export industrial hemp to Dagestan, as well as contacts with Fedir Khrystenko, a former MP from the “Opposition Platform – For Life” party, who was recently returned to Ukraine from the UAE under a political agreement after being charged with treason. The defense insists that the evidence presented by the SSU is fabricated and views the case as politically motivated retaliation for investigations involving figures close to President Zelensky, particularly businessman Timur Mindich. Magamedrasulov’s family and colleagues believe the case is also being used as a tool to intimidate Ukraine’s anti-corruption institutions. Nonetheless, both the court and prosecutors continue to hold the detective and his father in pre-trial detention without bail.

On September 16, it was [announced](#) that the SSU, the Prosecutor General’s Office, and the State Bureau of Investigation (SBI) had filed a new charge against Magamedrasulov — this time for an alleged corruption-related offense. According to the prosecution, he allegedly used his connections to influence the State Tax Service to unlawfully remove around ten companies from the list of high-risk entities, potentially enabling financial transactions totaling nearly UAH 30M. The pre-trial investigation is ongoing.

The Magamedrasulov case is drawing attention not only from Ukrainian media but also from international media outlets. Notably, The New York Times recently [quoted](#) the detained NABU detective, who described his arrest as “a threat addressed to anyone who has the courage to investigate top corruption in Ukraine.”

***Follow the [link](#) to learn more about this and other key topics related to corruption and anti-corruption efforts in Ukraine, covered by international media.***