

SAMPLE DRAFT INDICTMENT

THE SPECIAL COURT FOR UKRAINE

THE PROSECUTOR

Against

**VLADIMIR VLADIMIROVICH PUTIN
PRESIDENT OF THE RUSSIAN FEDERATION**

INDICTMENT

The Prosecutor, Special Court for Ukraine, charges:

VLADIMIR VLADIMIROVICH PUTIN

with **THE CRIME OF AGGRESSION, CRIMES AGAINST HUMANITY, VIOLATIONS OF ARTICLE 3 COMMON TO THE GENEVA CONVENTIONS WITH REGARD TO THE PRE-24 FEBRUARY 2022 NON-INTERNATIONAL ARMED CONFLICT IN THE DONBAS, AND OF ADDITIONAL PROTOCOL I, AND OTHER SERIOUS VIOLATIONS OF INTERNATIONAL HUMANITARIAN LAW, AND WAR CRIMES, IN VIOLATION OF ARTICLES 5, 6, and 7 OF THE ROME STATUTE** as set forth below:

THE ACCUSED

1. **VLADIMIR VLADIMIROVICH PUTIN** (“the **ACCUSED**”) was born on 7 October 1952 in Leningrad, Russian Soviet Federative Socialist Republic, Union of Soviet Socialist Republics, now known as Saint Petersburg, Russian Federation.

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GENERAL ALLEGATIONS

2. At all times relevant to this Indictment, a state of armed conflict existed within the internationally recognized borders of Ukraine, as established on November 4, 1991, by the “Law of Ukraine”. The armed conflict has characteristics of both an international armed conflict between the states of Ukraine and the Russian Federation and a non-international armed conflict between Ukraine and its regions of Donetsk and Luhansk, collectively referred to as “the Donbas”.
3. At all times relevant to this indictment, a nexus existed between the armed conflict within the territorial boundaries of Ukraine and all acts or omissions charged herein as violations of the various sources of international humanitarian law and/or the law of armed conflict, including treaties, conventions, and those international norms and precedents constituting customary international law for the purpose of this Tribunal.
4. For the purposes of this Indictment, organized armed factions involved in this conflict include the Armed Forces of Ukraine (“AFU”), the State Border Guard Services of Ukraine (“SBGSU”), the Armed Forces of the Russian Federation (“AFRF”), and elements of the Armed Forces of the Republic of Belarus (“AFB”).
5. For purposes of this Indictment, irregular and/or non-state combatants include the Donetsk People’s Militia (“DPM”), the Lugansk People’s Militia (“LPM”), and various mercenary groups (collectively “Russian backed mercenaries”), including, but not limited to the Wagner Group (“WG”).
6. The AFRF is the official state military of the Russian Federation.
7. The AFU is the official state military of Ukraine.
8. The SBGSU is, while not under the control of the military, effectively the equivalent of a state military force and/or organized state militia and coast guard of Ukraine, and is organized as such.
9. The AFB is the official state military of the Republic of Belarus.
10. The AFU consists of ground forces, an air force, a navy including sea, air, and infantry components, an air assault force, and special operations forces. The AFU also includes a national guard component called the Territorial Defense Forces (“TDF”) which includes, since February 2022, a Foreign Legion, the International Legion of Territorial Defense of Ukraine (“ILTDU”), which permits foreign nationals to formally enlist in the TDF of

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Ukraine as regular troops. The Russian Federation has refused to recognize members of the ILTDU as lawful combatants and members of the organized military of Ukraine, despite their status as such under Ukrainian law.

11. The AFRF is comprised of the Russian Ground Forces, Russian Navy, Russian Aerospace Forces, Strategic Rocket Forces, Airborne Forces, and Special Operations Forces.
12. The AFRF is under the direct control of the Security Council of Russia. Every decision made by the Security Council of Russia is approved by the President of the Russian Federation, who then issues decrees or orders implementing these decisions.
13. The AFB is under the command and control of the President of the Republic of Belarus via the Ministry of Defense of the Republic of Belarus, over which the President has *de facto* complete control. The AFB consists of ground forces, an air force, and air defense forces.

THE INCEPTION AND EXPANSION OF THE ARMED CONFLICT

14. In 1991, Ukraine and the Russian Federation gained full independence from the Union of Soviet Socialist Republics. Much of the geographical territories of both Ukraine and the Russian Federation have periodically been incorporated into larger entities including the Russian Empire and the Union of Soviet Socialist Republics. Ukraine, a state with a population of roughly 44 million before the conflict at issue in the Indictment has a large Russian-speaking population and ethnic Russian population.
15. Since the dissolution of the Union of Soviet Socialist Republics, Ukraine and its people have developed close ties with the North Atlantic Treaty Organization (“NATO”) and its members and the European Union (“EU”) and its members. Ukraine has expressed interest in joining both NATO and the EU.
16. After the election of Viktor Yanukovich to the Presidency of Ukraine in 2010 however, he began to move Ukraine away from the EU and NATO and took steps to develop closer ties with the Russian Federation. The result was substantial civil unrest in Ukraine. Protests began in 2013 and by early 2014, the conditions in Ukraine were close to that of an internal armed conflict between those supporting the turn back towards the Russian Federation and those in favor of joining the EU and NATO.
17. The **ACCUSED** admits to having held a lengthy meeting with his security and defense officials regarding the occupation and annexation of Crimea, a region of Ukraine on or

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- about 22-23 February 2014, when former President of Ukraine Viktor Yanukovich, fled Ukraine for Russia in the wake of protests and democratic movement colloquially known as the “Euromaidan” movement later transforming into the pro-democracy uprising called the “Revolution of Dignity” in Ukraine. The **ACCUSED** has publicly admitted that he gave the order to “...bring Crimea back into Russia” at the conclusion of the meeting.
18. The Crimean Peninsula has been a part of both Ukraine and the Russian Empire, and even after the fall of the Union of Soviet Socialist Republics, its port of Sevastopol has remained, with Ukrainian approval, the base of the Russian Black Sea Fleet.
 19. On 27 February 2014, members of the AFRF without insignia, under the direction of the **ACCUSED** began to occupy the Crimean Peninsula, commencing the international armed conflict between Ukraine and the Russian Federation.
 20. On 16 March 2014, with the support of the Russian Federation, Crimea declared independence from Ukraine.
 21. On 18 March 2014, the Russian Federation formally annexed Crimea, in violation of international law and the Russian Federation’s written commitments to Ukraine.
 22. On or about 6 April 2014, with the backing of the Russian Federation, pro-Russian Federation separatist groups staged protests in the eastern Ukrainian regions of Donetsk and Luhansk, collectively referred to as the Donbas.
 23. On 7 April 2014, the self-proclaimed Donetsk People Republic (“DPR”) and on 27 April 2014, the Lugansk People’s Republic (“LPR”) was declared. Thereafter, referendums were held and both the DPR and LPR declared independence from Ukraine in May 2014.
 24. An armed conflict ensued between Russian-backed irregular forces of the DPR and LPR and both regular and irregular forces of Ukraine. The conflict persisted for eight years and Ukraine suffered casualties in excess of 14,000. It remains unclear how many civilians and irregular forces were killed in the conflict between February 2014 and 23 February 2022.
 25. Between February 2014 and 23 February 2022, the armed conflict in the Donbas was primarily a non-international armed conflict by virtue of the widespread use of pro-government and anti-government irregular forces and militias in opposition to the AFU and pro-Ukrainian irregular forces. There was both direct and indirect involvement of the AFU and AFRF.

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26. Commencing in the autumn of 2021, the AFRF began a substantial buildup of troops, equipment, and supplies along the Russian and Belarusian borders with Ukraine, as well as in the occupied Crimea. During the buildup, the **ACCUSED** and his administration repeatedly assured the world that the Russian Federation “had no plans” to invade Ukraine.
27. On 21 February 2022, the **ACCUSED** stated, in a public address to the Russian People, that the Russian Federation would recognize the DPR and LPR as independent from Ukraine, which it did on 22 February 2022.
28. On 24 February 2022, during a meeting of the United Nations Security Council, chaired by the delegation of the Russian Federation that had recently assumed the rotating Presidency of the Council, to address tensions between the Russian Federation and Ukraine, the AFRF, at the direction of **ACCUSED**, escalated the eight-year armed conflict between Ukraine the Russian Federation drastically by expanding the war across Ukraine.
29. Wider hostilities commenced at the direction of the **ACCUSED** when the AFRF commenced an armed attack on the territory of Ukraine, with the aerial and naval bombardment of multiple targets in Ukraine and a ground offensive along multiple fronts, including from occupied Crimea and the territory of the Republic of Belarus into Ukraine.
30. The attack spanned most of the Ukrainian territory, but was focused in the Kyiv region, Northeastern Ukraine centered around Kharkiv and Sumy, Eastern Ukraine including the Donbas region, and Southern Ukraine from Mykolaiv to Mariupol, as well as on the Black Sea and the Sea of Azov.
31. The **ACCUSED** and all members of the AFRF engaged in fighting within Ukraine were required to abide by international humanitarian law and the laws and customs governing the conduct of armed conflicts and to the United Nations Charter, to which the Russian Federation bound itself by virtue of the Alma-Ata Protocol signed 21 December 1991 by 11 former member states of the Union of Soviet Socialist Republics, including the Russian Federation and Ukraine, by which Protocol, the Russian Federation became a successor state at the United Nations to the Union of Soviet Socialist Republics.
32. All offenses alleged herein were committed within the territory of Ukraine on or after 22 February 2014.
33. All acts and omissions charged herein as Crimes Against Humanity were committed as part of a widespread or systematic attack directed against the civilian population of Ukraine.

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34. All acts and omissions charged herein as War Crimes were committed as part of a non-international armed conflict (Donbas 2014-2022) and an international armed conflict in Crimea (2014-Present).
35. The words civilian or civilian population used in this Indictment refer to persons who took no part in the hostilities, or who were no longer taking an active part in the hostilities.

INDIVIDUAL CRIMINAL RESPONSIBILITY OF THE ACCUSED

36. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 35, which are associated by reference.
37. **VLADIMIR VLADIMIROVITCH PUTIN, the ACCUSED** last assumed the Office of the President of the Russian Federation on 7 May 2012. He had previously served in the role from 7 May 2000 through 7 May 2008. From 7 May 2008 through 7 May 2012, the **ACCUSED** served as Prime Minister of the Russian Federation.
38. At all times relevant to this Indictment, the **ACCUSED** has been the President of the Russian Federation and the Chairman of the Security Council of Russia.
39. In order to destabilize Ukraine, which the **ACCUSED** has claimed to be a fiction, to eliminate, in whole or in part, the Ukrainian national group by erasing the Ukrainian culture and national identity, and to expand the territory of the Russian Federation, the **ACCUSED**, with the assistance and complicity of, and acting in concert with, the Security Council of Russia, the Republic of Belarus and its armed forces and President, and the AFRF, directed the AFRF, non-state combatants, including the militias of the DPR and LPR, and mercenaries such as the WG, to conduct organized armed attacks on the territory of Ukraine, the AFU, the SBGSU, and Ukrainian civilian population.
40. Throughout the course of the armed conflict in Ukraine, the AFRF, under the authority, command and control of the **ACCUSED**, engaged in widespread or systematic attacks against the civilian population of Ukraine.
41. At all times relevant to this Indictment, the **ACCUSED** supported and encouraged all actions of the Security Council of Russia, the AFRF, and other combatants under his direction, acting in concert with the Security Council of Russia, the command staff of the AFRF, the non-state combatants of the DPR, LPR, and mercenary groups.

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42. The **ACCUSED** and the Security Council of Russia shared a common plan, purpose, and/or design (joint criminal enterprise) that was to use the AFRF and non-state combatants to gain and exercise political power and control over the territory of Ukraine, as evidenced by the “Russian Donbas Doctrine” first announced by DPR President Denis Pushilin and adopted by DPR and LPR, which called for a union state with the Russian Federation, in clear violation of the territorial integrity of Ukraine, guaranteed by international law, the Minsk Agreements, and the Budapest Memorandum on Security Assurances of 5 December 1994.
43. The crimes alleged in this Indictment, including but not limited to aggression, unlawful killings, abductions, forced deportation, targeting of journalists and civilians, and prevention of humanitarian aid, were either actions within the joint criminal enterprise or were a reasonably foreseeable consequence of the joint criminal enterprise.
44. **VLADIMIR VLADIMIROVITCH PUTIN**, the **ACCUSED**, by his acts or omissions, is individually criminally responsible for each of the crimes alleged in this Indictment, which crimes the **ACCUSED** planned, instigated, ordered, committed, or in whose planning, preparation or execution the **ACCUSED** otherwise aided and abetted, or which crimes were within a joint criminal enterprise in which the **ACCUSED** participated or were a reasonably foreseeable consequence of the joint criminal enterprise in which the **ACCUSED** participated.
45. In addition, or alternatively, **VLADIMIR VLADIMIROVITCH PUTIN**, the **ACCUSED**, while holding positions of superior responsibility and exercising command and control over his subordinates, is criminally responsible for the crimes alleged. The **ACCUSED** is individually vicariously responsible for the criminal acts of his subordinates, including all members of the AFRF, in that he knew or had reason to know that the subordinate was about to commit such acts or had done so and the **ACCUSED** failed to take the necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof.

CHARGES

46. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 47, which are associated by reference.

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47. At all times relevant to this Indictment, members of the AFRF and non-state combatants, supported and encouraged by, acting in concert with and/or subordinate to the Security Council of Russia and **VLADIMIR VLADIMIROVITCH PUTIN**, the **ACCUSED**, conducted armed attacks throughout the territory of Ukraine, including but not limited to Kyiv, Northeastern Ukraine, Eastern Ukraine including the Donbas, and Southern Ukraine. Targets of the armed attacks included civilians and humanitarian assistance personnel.
48. The attacks included, but were not limited to, widespread and systematic unlawful killings of civilians and journalists, the intentional and/or reckless destruction of numerous medical facilities and cultural institutions, the taking of civilian hostages, the forced deportation of Ukrainian citizens, and the targeting of humanitarian assistance efforts.
49. The Prosecutor alleges, in the following Counts, numerous representative actions constituting violations of international humanitarian law and the law of armed conflict, however, it should be noted that these offenses are not the sole instances of unlawful conduct and that the full breadth and scope of the joint criminal enterprise and conspiracy shall be the subject of the trial of the **ACCUSED**, and the **ACCUSED** is hereby placed on notice that the Prosecutor intends to and shall present evidence of further conduct in support of its case against the accused as to each Count stated in this Indictment.

COUNT 1: THE CRIME OF AGGRESSION

50. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 49, which are associated by reference.
51. The **ACCUSED**, at all times relevant to this Indictment, was a person in a position effectively to exercise control over or to direct the political and/or military action of the Russian Federation.
52. The **ACCUSED**, by his own public statements, engaged in the planning, preparation, initiation, and/or execution, of an act of aggression which, by its character, gravity, and scale, constitutes a manifest violation of the Charter of the United Nations, to wit: the **ACCUSED** through his own actions and omissions between 22 February 2014 and 31 March 2022, engaged in a course of conduct that directly caused aggressive actions to be taken by the Russian Federation against Ukraine.

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53. The **ACCUSED** was directly involved in the planning, preparation, initiation, and/or execution of the use of armed force by the State of the Russian Federation against the sovereignty, territorial integrity, and/or political independence of Ukraine.
54. The **ACCUSED** directly precipitated the use of armed force by the Russian Federation in violation of the Charter of the United Nations, to which the Russian Federation is bound by virtue of the Alma-Ata Protocol.
55. Pursuant to United Nations General Assembly resolution 3314 (XXIX) of 14 December 1974, which defines aggression, the **ACCUSED** participated in numerous acts of aggression against Ukraine constituting collectively, and individually, the Crime of Aggression.
56. The **ACCUSED** participated in the planning, preparation, initiation, and/or execution of the invasion or attack by the AFRF upon the territory of Ukraine and the military occupation of wide swaths of the territory of Ukraine, including, but not limited to the unlawful occupation and annexation of Crimea in 2014 and the occupation of the cities of Kherson and Mariupol in 2022.
57. The **ACCUSED**, and his subordinates, provided material support to armed irregular groups and mercenaries within the territorial bounds of Ukraine commencing in February 2014, most notably by providing arms, equipment, and other support to irregular armed groups of the DPR and LPR during the non-international armed conflict in the Donbas between Ukraine, the DPR, and the LPR.
58. The **ACCUSED** participated in the planning, preparation, initiation, and/or execution of the AFRF bombardment of the territory of Ukraine and/or the use of weapons by the Russian Federation against the territory of Ukraine.
59. The **ACCUSED** participated in the planning, preparation, initiation, and/or execution of the blockade of the ports and/or coasts of Ukraine by the AFRF, including the blockade, and in some cases the occupation of several ports of Ukraine on the Black Sea and the Sea of Azov.
60. The **ACCUSED** participated in the planning, preparation, initiation, and/or execution of the attack by the AFRF on the land, sea, or air forces, or marine and air fleets of Ukraine.
61. The **ACCUSED** participated in the planning, preparation, initiation, and/or execution of the use of AFRF forces, which at the commencement of hostilities between the Russian

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Federation and Ukraine in 2014, were within the territory of Ukraine with the agreement of Ukraine pursuant the Partition Treaty on the Status and Conditions of the Black Sea Fleet, signed by the Russian Federation and Ukraine on 28 May 1997. The treaty, among other things, provided for the leasing of the Port of Sevastopol and basing of the AFRF's Black Sea Fleet in Sevastopol, Ukraine, in contravention of the conditions provided for in the agreement. A further such offense was committed by the extension of the Russian Black Sea Fleet's presence in Ukraine beyond 2017, the termination of the agreement.

62. The **ACCUSED** participated in the planning, preparation, initiation, and/or execution of an act of aggression by the Republic of Belarus against Ukraine, when, acting in concert with his co-conspirators, the Republic of Belarus and its President, Alexander Lukashenko, the **ACCUSED** encouraged the Republic of Belarus to allow its territory, to be placed at the disposal of the Russian Federation in furtherance of the aforementioned joint criminal enterprise, to be used by the Russian Federation for perpetrating one or more acts of aggression against Ukraine.
63. The **ACCUSED** participated in the planning, preparation, initiation, and/or execution of the sending by or on behalf of the Russian Federation, of armed bands, groups, irregulars, or mercenaries into Ukrainian territory, which have carried out acts of armed force against Ukraine of such gravity as to amount to the acts listed above, or its substantial involvement therein.
64. Each of the foregoing offenses in and of themselves constitutes a separate Crime of Aggression and are charged in the alternative.

By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN**, is individually criminally responsible for the crimes alleged below:

Count 1: The Crime of Aggression, a **VIOLATION OF ARTICLES 5 of UNITED NATIONS GENERAL ASSEMBLY RESOLUTION 3314 (XXIX) of 14 December 1974 and customary international law.**

COUNTS 2 – 3: UNLAWFUL TARGETING OF MEDICAL FACILITIES

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65. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 64, which are associated by reference.
66. The AFRF, supported and encouraged by, acting in concert with and/or subordinate to **VLADIMIR VLADIMIROVITCH PUTIN** targeted and bombed multiple protected hospital units. Hospital units included, but were not limited to, the following:

Mariupol

67. On 9 March 2022, the AFRF bombed a maternity hospital in Mariupol, unlawfully killing at least three civilians and injuring at least 17 civilians.

Zhytomyr

68. In March 2022, the AFRF bombed a children's hospital in Zhytomyr, injuring civilians.

Kharkiv

69. On 11 March 2022, the AFRF bombed a psychiatric hospital in Kharkiv.
70. Between 24 February 2022 and 21 March 2022, the Russian military targeted, bombed, or otherwise compromised a total of 64 protected medical facilities, unlawfully killing at least fifteen civilians and injuring an unknown number of civilians.

By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN**, is individually criminally responsible for the crimes alleged below:

Count 2: Intentional destruction of medical facilities, a **VIOLATION OF ARTICLES 8(2)(a)(i) and 8(2)(b)(ix) OF THE ROME STATUTE**

And:

Count 3: Murder, a **VIOLATION OF ARTICLE 7(1)(a) OF THE ROME STATUTE**

**COUNTS 4-5: USE OF INDISCRIMINATE FORCE AGAINST CIVILIAN TARGETS,
INCLUDING THE INDISCRIMINATE USE OF CLUSTER MUNITIONS**

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71. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 70, which are associated by reference.
72. The AFRF, supported and encouraged by, acting in concert with and/or subordinate to **VLADIMIR VLADIMIROVITCH PUTIN** engaged in the widespread and systematic use of indiscriminate bombardment of civilian areas and targets, including, but not limited to, the indiscriminate use of cluster munitions that killed and injured civilians. Instances of the indiscriminate targeting of civilians included, but were not limited to, the following:

Okhtyrka:

73. On 25 February 2022, AFRF forces struck a nursery and elementary school in Okhtyrka with indiscriminate cluster munitions, unlawfully killing at least one civilian and injuring at least three civilians.

Vuhledar

74. On 24 February 2022, the AFRF struck a hospital in Vuhledar indiscriminately with cluster munitions, thereby unlawfully killing at least four civilians, injuring 10 civilians, and damaging the hospital and one ambulance.

Kharkiv

75. On or around 28 February 2022, the AFRF struck multiple civilian residences in the Kharkiv region indiscriminately with cluster munitions, thereby unlawfully killing at least nine civilians, injuring at least 37 civilians, and unlawfully damaging civilian property.
76. On 3 March 2022, the AFRF struck multiple civilian residences in the Kharkiv region indiscriminately with cluster munitions, thereby unlawfully killing at least four civilians, injuring at least 16 civilians, and unlawfully damaging civilian property.

Mariupol

77. Starting on or around 12 March 2022, the AFRF began a barrage of constant shelling in the town of Mariupol. The shelling has interrupted humanitarian aid and civilian access to basic necessities and has killed at least 1,500 civilians.

Irpin

78. Starting on or around 6 March 2022, the ARF began a barrage of constant shelling in the town of Irpin, killing at least five civilians and injuring civilians.

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By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN** is individually criminally responsible for the crimes alleged below:

Count 4: Willful killing, a **VIOLATION OF ARTICLE 8(2)(b)(i) of the Rome Statute**

Count 5: Extensive destruction of property carried out unlawfully and wantonly, a **VIOLATION OF ARTICLE 8(2)(b)(iv) of the Rome Statute;**

COUNTS 6 – 7: WILLFULLY CAUSING GREAT SUFFERING AND MURDER OF CIVILIANS

79. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 78, which are associated by reference.
80. The AFRF, supported and encouraged by, acting in concert with and/or subordinate to **VLADIMIR VLADIMIROVITCH PUTIN** bombed a theatre being used to shelter civilians in Mariupol, Ukraine, that at the time of such targeting, was clearly marked in the Russian language with the word “Children”, thereby intentionally and unlawfully killing at least 300 civilians and injuring numerous other civilians.

By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN** is individually criminally responsible for the crimes alleged below:

Count 6: Willfully causing great suffering, or serious injury to body or health, a **VIOLATION OF ARTICLE 8(2)(a)(iii) OF THE ROME STATUTE**

And:

Count 7: Murder, a **VIOLATION OF ARTICLE 8(2)(a)(i) OF THE ROME STATUTE**

COUNT 8 – 9: ABDUCTION AND DETAINMENT OF GOVERNMENT OFFICIALS

81. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 80, which are associated by reference.

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82. The AFRF, supported and encouraged by, acting in concert with and/or subordinate to **VLADIMIR VLADIMIROVITCH PUTIN** abducted and detained multiple public officials, including but not limited to:

Melitopol:

83. On 11 March 2022, the Russian military abducted mayor Ivan Federov and held him hostage for five days. Mr. Federov was released in a prisoner exchange on 16 March 2022.

Dniprorudne

84. On 13 March 2022, the Russian military abducted mayor Yevhen Matveyev. As of 25 March 2022, Mr. Matveyev has not been released from Russian custody.

Velykoburlutska

85. On 17 March 2022, the Russian military abducted mayor Viktor Tereshchenko from his office. Mr. Tereshchenko was released on 18 March 2022 and went to the hospital for injuries sustained because of the Russian military.

Beryslav

86. On 19 March 2022, the Russian military abducted mayor Oleksandr Shapovalov. Mr. Shapovalov remains in Russian custody as of 25 March 2022.

By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN** is individually criminally responsible for the crimes alleged below:

Count 8: Taking of Hostages, a **VIOLATION OF ARTICLE 8(2)(a)(viii) OF THE ROME STATUTE**

And:

Count 9: Detention and Severe Deprivation of Liberty, a **VIOLATION OF ARTICLE 7(1)(e) OF THE ROME STATUTE**

COUNTS 10 – 11: TAKING OF HOSTAGES

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87. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 86, which are associated by reference.
88. On 24 February 2022, Russian military forces seized the Chernobyl Nuclear Power Plant near Pripyat, Ukraine, and held at least 200 civilians hostage until 21 March 2022. These civilian hostages were not provided basic amenities, including soap or water, and were not provided adequate food, water, or medicine. The civilian hostages were forced to perform labor related to the upkeep of the Chernobyl Nuclear Power Plant.

By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN** is individually criminally responsible for the crimes alleged below:

Count 10: Taking of Hostages, a VIOLATION OF ARTICLE 8(2)(a)(viii)

Count 11: Detention and Severe Deprivation of Liberty, a VIOLATION OF ARTICLE 7(1)(e) OF THE ROME STATUTE

COUNTS 12 – 13: TARGETING OF JOURNALISTS AND MEMBERS OF THE PRESS

89. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 88, which are associated by reference.
90. The Russian military, supported and encouraged by, acting in concert with and/or subordinate to **VLADIMIR VLADIMIROVITCH PUTIN** targeted and killed multiple civilian journalists and other members of the press, including but not limited to:

Kyiv:

91. On 13 March 2022, Russian military forces shot at and unlawfully killed journalist Brent Renaud and injured journalist Juan Arrendondo.
92. On 14 March 2022, the Russian military shelled and unlawfully killed journalists Oleksandra “Sasha” Kuvshynova and Pierre Zakrzewski and seriously injured journalist Benjamin Hall.
93. Including the above crimes, Russian military forces have unlawfully killed at least five journalists, injured seven journalists, and abducted six journalists since 24 February 2022.

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By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN** is individually criminally responsible for the crimes alleged below:

Count 12: Murder, a VIOLATION OF ARTICLE 7(1)(a) OF THE ROME STATUTE

And:

Count 13: Intentionally launching indiscriminate attacks against civilians, a VIOLATION OF ARTICLE 8(2)(b)(iv) OF THE ROME STATUTE

COUNTS 14 – 15: BOMBING OF EVACUATION AND HUMANITARIAN ROUTES

94. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 93, which are associated by reference.
95. The Russian military, supported and encouraged by, acting in concert with and/or subordinate to **VLADIMIR VLADIMIROVITCH PUTIN** targeted civilian evacuation routes and killed multiple civilians, including but not limited to:

Mariupol:

96. On 7 March 2022, Russian military forces planted butterfly mines in a proposed civilian evacuation route in an attempt to seriously injure civilian evacuees.
97. On 8 March 2022, Russian military forces shelled a civilian evacuation route from Zaporizhzhia to Mariupol, preventing humanitarian aid from reaching Mariupol and preventing civilians from evacuating Zaporizhzhia.

Irpın:

98. On 6 March 2022, Russian military forces fired indiscriminately at a civilian evacuation route, unlawfully killing four civilians.

Lyman:

99. On 13 March 2022, Russian military forces performed an airstrike that indiscriminately struck a civilian evacuation train, unlawfully killing one civilian and injuring one civilian.

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By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN** is individually criminally responsible for the crimes alleged below:

Count 14: Intentionally directing attacks toward the civilian population, a **VIOLATION OF ARTICLE 8(2)(b)(ii) OF THE ROME STATUTE**

And:

Count 15: Murder, a **VIOLATION OF ARTICLE 7(1)(a) OF THE ROME STATUTE**

COUNTS 16 – 18: FORCED DEPORTATION OF UKRAINIAN CITIZENS

100. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 99, which are associated by reference.
101. The Russian military, supported and encouraged by, acting in concert with and/or subordinate to **VLADIMIR VLADIMIROVITCH PUTIN** began forcibly deporting Ukrainian citizens to Russia, including but not limited to:

Mariupol:

102. Starting on 20 March 2022, Russian military forces have forcibly deported at least 15,000 Ukrainian citizens to the Taranog region of Russia while depriving them of all official Ukrainian documentation, including passports. At least some of these Ukrainian citizens are being transferred to other locations in southwestern Russia to perform forced labor.

Donbas

103. Starting on 21 March 2022, Russian military forces have forcibly deported at least 2,389 Ukrainian citizen children to various locations within the Russian Federation.

By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN** is individually criminally responsible for the crimes alleged below:

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Count 16: Deportation of population, a **VIOLATION OF ARTICLE 7(1)(d) OF THE ROME STATUTE**

And:

Count 17: Enforced disappearance of persons, a **VIOLATION OF ARTICLE 7(1)(i) OF THE ROME STATUTE**

And:

Count 18: Unlawful deportation, a **VIOLATION OF ARTICLE 8(2)(a)(vii) OF THE ROME STATUTE**

COUNTS 19: ATTACKS UPON NUCLEAR POWER FACILITIES

104. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 103, which are associated by reference.

Chernobyl:

105. On 24 February 2022, the AFRF seized the Chernobyl Nuclear Power Plant near Pripyat, Ukraine, and held at least 200 civilians hostage until 21 March 2022. These civilian hostages were not provided basic amenities, including soap or water, and were not provided adequate food, water, or medicine. The civilian hostages were forced to perform labor related to the upkeep of the Chernobyl Nuclear Power Plant.

Zaporizhzhia

106. On or about 4 March 2022, the AFRF under the command and control of the **ACCUSED**, attacked the largest nuclear electrical power station in Europe, the Zaporizhzhya Nuclear Power Plant causing a large fire at an adjacent building, before seizing the plant. The fire posed a substantial risk to the nuclear power plant and could have resulted in radiological disaster impacting the surrounding area as well as non-combatant states across Europe.

SAMPLE DRAFT INDICTMENT

By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN** is individually criminally responsible for the crimes alleged below:

Count 30: Attacks upon works and installations containing dangerous forces, to wit: nuclear electrical generating stations, a **VIOLATION OF ARTICLE 56 OF THE PROTOCOL ADDITIONAL TO THE GENEVA CONVENTIONS OF 12 AUGUST 1949, AND RELATING TO THE PROTECTION OF VICTIMS OF INTERNATIONAL ARMED CONFLICTS (PROTOCOL I)** and **ARTICLE 15 OF THE PROTOCOL ADDITIONAL TO THE GENEVA CONVENTIONS OF 12 AUGUST 1949, AND RELATING TO THE PROTECTION OF VICTIMS OF NON-INTERNATIONAL ARMED CONFLICTS (PROTOCOL II)**.

COUNTS 20: RECRUITMENT, USE, AND FINANCING OF MERCENARIES

107. The Prosecutor repeats and re-alleges the allegations set forth in Paragraphs 1 through 106, which are associated by reference.
108. Beginning with the invasion of Crimea in 2014, the **ACCUSED** and his co-conspirators, recruited, used, and financed mercenaries engaged in offensive operations within the territorial boundaries of Ukraine.
109. At some point between 24 February 2022 and 31 March 2022, the AFRF began recruiting, enlisting, and transporting mercenary soldiers from the Syrian Arab Republic to act as mercenaries in the conflict in Ukraine. As of 31 March 2022, the AFRF has enlisted at least 300 soldiers to work as mercenaries.
110. The Russian Federation has offered each mercenary approximately \$7,000 per month to travel to Ukraine and participate in the conflict.

By his acts or omissions in relation, but not limited to these events, **VLADIMIR VLADIMIROVITCH PUTIN** is individually criminally responsible for the crimes alleged below:

SAMPLE DRAFT INDICTMENT

Count 20: Recruitment, Use, and Financing of Mercenaries, a **VIOLATION OF ARTICLE 2 OF THE INTERNATIONAL CONVENTION AGAINST THE RECRUITMENT, USE, FINANCING, AND TRAINING OF MERCENARIES.**

Dated this 6 day of April 2022

The Prosecutor