

THE IMPACT OF RUSSIAN AGGRESSION ON LIMITATION OF THE CONSTITUTIONAL RIGHT TO FREEDOM OF MOVEMENT IN UKRAINE*

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Abstract. According to Article 33 of the Constitution of Ukraine, everyone who is legally staying in the territory of Ukraine is guaranteed freedom of movement, free choice of place of residence, and the right to freely leave the territory of Ukraine, with the exception of restrictions established by law. The consequence of Russian aggression was not only the departure of several million Ukrainian citizens abroad in search of salvation from hostilities. The consequence was that the Ukrainian state was faced with the challenge of introducing restrictions on a number of constitutional human rights. However, under the circumstances of a full-scale Russian-Ukrainian war, it turned out that theoretical considerations, the formulation of relevant concepts and principles of limiting the exercise of human rights “lag behind” the realities of war and require significant improvement. After all, the introduction of martial law in Ukraine significantly complicated the state’s ability to implement constitutionally guaranteed rights and freedoms. The consequence of such at times chaotically introduced legal restrictions was the narrowing of the content and scope of human and citizen rights and freedoms. At the same time, Article 22 of the Constitution of Ukraine establishes that human and citizen rights and freedoms affirmed by this Constitution are not exhaustive. Constitutional rights and freedoms are guaranteed and should not be abolished. The content and scope of existing rights and freedoms should not be diminished by the adoption of new laws or by the amendment of laws that are in force.

Keywords: human rights; human rights restrictions; constitutional right to freedom of movement; martial law.

INTRODUCTION

According to Article 33 of the Constitution of Ukraine, everyone who is legally present on the territory of Ukraine is guaranteed freedom of movement, free choice of place of residence, and the right to freely leave the territory of

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Ukraine, with the exception of restrictions established by law.¹ The consequence of the full-scale invasion of Ukraine, which took place on February 24, 2022, was the commission of genocide, crimes against humanity, and other war crimes by the Russian occupying army, which are already being assessed by the International Criminal Court in the Hague. In particular, on March 17, 2023, the Pre-Trial Chamber of the ICC, in connection with the illegal removal of children from Ukraine, issued arrest warrants for Vladimir Putin and Maria Lvova-Belova,² and recently, on June 24, 2024, arrest warrants for the former Minister of Defense of the Russian Federation Sergei Shoigu and Chief of the Russian General Staff Valery Gerasimov, the reason for which was the task of the Russian army to strike energy facilities in Ukraine. The ICC emphasized that the suspects intentionally caused great suffering or serious bodily injury or damage to the mental or physical health of the civilian population, and therefore bear criminal responsibility for crimes against humanity and other inhuman acts, as defined in Article 7(1) of the Rome Statute.³ Recent Russian missile strikes, such as on July 8, 2024, when at least 43 civilians were killed and more than 190 were injured as a result of a missile attack on Ukraine, while 34 people were killed in Kyiv alone, and one of the most terrible strikes fell on the largest children's hospital in Ukraine [Shvets' 2024], testify that the main target of such strikes are completely civilian objects, in particular, specialized children's hospitals and maternity hospitals. There is no doubt that the millstones of international criminal justice are slowly but surely beginning to "grind" the rights of representatives of the Russian authorities, effectively "locking" them in the circle of states that do not recognize the Rome Statute, and limiting their freedom of movement by creating the threat of detention and arrest on the territory of those more than one hundred and twenty states that ratified the Rome Statute. We are convinced that the time will come when Russian war criminals will bear the appropriate punishment before a specially created international tribunal, as it once happened at the Nuremberg Tribunal for the war criminals of Nazi Germany, the International Tribunal for the prosecution of persons responsible for serious violations of international humanitarian law, carried out on the territory of the former Yugoslavia and the International Tribunal for Rwanda, created to prosecute persons responsible for the genocide carried out on the territory of Rwanda and Rwandan citizens responsible for the genocide carried out on the territory of neighboring states.

¹ *Constitution of Ukraine*, https://hcj.gov.ua/sites/default/files/field/file/the_constitution_of_ukraine.pdf [accessed: 02.09.2024].

² *Mizhnarodnyy kryminal'nyy sud vydav order na areshyt putina*, <https://www.ukrinform.ua/rubric-world/3683849-mizhnarodnij-kryminalnij-sud-vidav-order-na-arest-putina.html> [accessed: 02.09.2024].

³ *MKS vydav order na areshyt Shoyhu ta Herasymova za masovani obstrily enerhosystemy Ukrayiny*, <https://www.radiosvoboda.org/a/news-kryminalnyy-sud-herasymov-shoyhu/33008483.html> [accessed: 02.09.2024].

1. LIMITATION OF THE CONSTITUTIONAL RIGHT TO FREEDOM OF MOVEMENT: THEORETICAL ASPECTS

We are only interested in problems related to the freedom of movement of representatives of the so-called Russian “elite” in the context of their criminal prosecution. At the same time, the consequence of the Russian-Ukrainian war was not only the departure of several million Ukrainian citizens abroad in search of salvation from hostilities. The consequence was that the Ukrainian state was faced with the challenge of introducing restrictions on a number of constitutional human rights and freedoms in relation to its own citizens. At one time, in the PhD thesis “Realization of human rights: problems of limitation (general theoretical aspects)”, which was defended in 2000, that is, almost 25 years ago, we, it would seem at that time, quite thoroughly analyzed the grounds for human rights limitations, in particular, such a constitutional basis as the interests of national security [Pankevych 2000]. Today we can claim that our conclusion that state activity cannot be unlimited and that human rights are one of the determining factors by which this activity is limited [ibid., 50], is relevant today. Article 19 of the Constitution of Ukraine establishes that “the legal order in Ukraine is based on the principles whereby no one shall be forced to do what is not envisaged by legislation.” At the same time, the Ukrainian Basic Law foresees cases when separate restrictions on the rights and freedoms of a person and a citizen can be established. In particular, Article 64 of the Constitution of Ukraine states that “under conditions of martial law or a state of emergency, specific restrictions on rights and freedoms may be established with the indication of the period of effect of these restrictions.” Actually, in the conditions of a full-scale Russian-Ukrainian war, it turned out that theoretical considerations, the formulation of relevant concepts and principles of human rights limitations “lag behind” the realities of war and require significant improvement. After all, the introduction of martial law in Ukraine significantly complicated the state’s ability to ensure the implementation of a number of constitutionally guaranteed human and citizen rights and freedoms. Moreover, it turned out that the subject of the introduction of legal restrictions is far from always the parliament as the legislative body of power in Ukraine, but also other authorities that actually do not even have the relevant powers for this. The consequence of such sometimes chaotically introduced legal restrictions was the narrowing of the content and scope of human and citizen rights and freedoms. At the same time, Article 22 of the Constitution of Ukraine establishes that “human and citizens’ rights and freedoms affirmed by this Constitution are not exhaustive. Constitutional rights and freedoms are guaranteed and shall not be abolished. The content and scope of existing rights and freedoms shall not be diminished in the adoption of new laws or in the amendment of laws that are in force.”

The aforementioned norms of the Ukrainian Basic Law correspond to the Universal Declaration of Human Rights, Article 29 of which stipulates that the “everyone has duties to the community in which alone the free and full development of his personality is possible. In the exercise of his rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.”⁴ They also meet the norms of the Convention on the Protection of Human Rights and Fundamental Freedoms.⁵ Thus, the Ukrainian legislator faced a problem: to introduce the necessary law-restrictive norms in the conditions of martial law (due primarily to the interests of national security), and at the same time to remain a democratic state governed by the rule of law. As noted by the former Minister of Foreign Affairs of the Republic of Poland Professor Adam Daniel Rotfeld rightly points out, Russia did not agree with the sovereign Ukrainian choice of a democratic path of development for the usual reason - if Ukraine succeeded on the chosen democratic path, then for millions of Russians it would become an example and inspiration for democratic changes in Russia itself [Rotfeld 2023, 6-7].

2. FEATURES OF CONSTITUTIONAL LAW IMPLEMENTATION ON FREEDOM OF MOVEMENT DURING THE PERIOD OF MARTIAL STATE

As for the specifics of the implementation of the constitutional right to freedom of movement during martial law, for obvious reasons, they mostly concern male citizens of Ukraine between the ages of 18 and 60. First of all, it should be noted that the relevant legal framework, which concerns the mentioned problem, still contains a number of inconsistencies and gaps, which lead to “different readings” of regulatory acts. As you know, after the Russian invasion, that is, from February 24, 2022, the State Border Service of Ukraine introduced restrictions on travel abroad for men of conscription age, guided by the provisions of the Law of Ukraine “On the Legal Regime of Martial Law” dated May 12, 2015,⁶ Decree of the President of Ukraine dated February 24, 2022 No. 64/2022 “On the Introduction of Martial Law in

⁴ *Zahal'na deklaratsiya prav lyudyny. Pryynyata i proholoshena rezolyutsiyeyu 217 A (III) Heneral'noyi Asambleyi OON vid 10 hrudnya 1948 roku*, “Ofitsiyyny visnyk Ukrayiny” vid 15.12.2008, № 93, stor. 89, statyya 3103, kod akta 45085/2008.

⁵ *Konventsia pro zakhyst prav lyudyny ta osnovopolozhnykh svobod*, “Ofitsiyyny visnyk Ukrayiny” vid 16.04.1998, № 13, / № 32 vid 23.08.2006, p. 270.

⁶ *Pro pravovyy rehym voyennoho stanu: Zakon Ukrayiny vid 12 travnya 2015 roku*, “Vidomosti Verkhovnoyi Rady” (VVR), 2015, № 28, p. 250.

Ukraine,”⁷ the Law of Ukraine “On Mobilization Training and Mobilization” dated October 21, 1993,⁸ as well as a number of other secondary legal acts. Analysing the relevant legal norms, we would like to note that after the start of the war and the declaration of martial law in Ukraine, the right to unhindered crossing of the border for men of conscription age applies to a rather limited circle of persons. Moreover, the list of such persons is constantly changing in the direction of its decrease. In particular, at the beginning of the war, it was possible for the following categories of persons to go abroad: men from 18 to 60 years old, who permanently live abroad and have a corresponding mark in their passport; persons excluded from military registration due to health; persons with disabilities of groups I-III, in the presence of relevant documents confirming disability and social benefits; single parents raising a child or children under the age of 18; parents, guardians, custodians, adoptive parents, foster parents who raise a child with a disability under the age of 18; parents who are dependent on an adult child who is a person with a disability of group I or II; relatives who accompany children with disabilities when traveling outside of Ukraine, if they belong to the category of persons who are not subject to conscription for military service during mobilization; persons who have a spouse (husband) from among persons with disabilities and accompany her when traveling outside Ukraine; persons who have one of their parents or the parents of their spouse (husband) from among persons with disabilities of the I or II group and accompany one of such parents to travel outside Ukraine; persons who provide permanent care for persons with disabilities of the I or II group and accompany such persons outside Ukraine; guardians of persons with disabilities, recognized by the court as incapable, who accompany such persons to travel outside Ukraine; unfit for military service due to their health for a period of up to 6 months - according to the opinion of the military medical commission; military personnel on leave - subject to the permission of the military unit; military personnel undergoing military training abroad; employees of the diplomatic service who are sent on official or long-term business trips, and members of their families who will stay with them at the place of their long-term business trip; students of vocational pre-university and higher education, trainee assistants, post-graduate students and doctoral students studying abroad on full-time or dual forms of education (students, trainees).

In addition, in the presence of relevant documents, representatives of a number of professions are also allowed to travel abroad: ship crew

⁷ *Pro vvedennya voyennoho stanu v Ukraini: Ukaz Prezydenta Ukrainy vid 24 lyutoho 2022 roku*, “Ofitsiynny visnyk Ukrainy” vid 14.06.2022 r., № 46, stor. 16, stattiya 2497, kod akta 111724/2022.

⁸ *Pro mobilizatsiynu pidhotovku ta mobilizatsiyu: Zakon Ukrainy vid 21 zhovtnya 1993 roku*, “Vidomosti Verkhovnoyi Rady Ukrainy” (VVR), 1993, № 44, p. 416.

members, railway workers, aviation personnel, vehicle drivers, volunteer drivers, cultural figures, athletes and coaches.

The next step was a gradual reduction in the number of men of draft age who could go abroad. The first such rather unexpected restriction was the ban on the travel abroad of students of professional pre-higher and higher education, trainee assistants, post-graduate students and doctoral students studying in Ukraine under full-time or dual forms of education. On April 1, 2022, the Cabinet of Ministers of Ukraine amended clauses 2-6 of the Resolution of the Cabinet of Ministers of Ukraine No. 57 of January 27, 1995 „On Approval of the Rules for Crossing the State Border by Citizens of Ukraine,”⁹ which prohibited their departure abroad. At the same time, the specified category of persons cannot be called up for military service without their consent, as they have the right to deferment, but they are also prohibited from leaving Ukraine. The situation with Ukrainian citizens studying abroad is somewhat different and, in our opinion, even more complicated and confusing. For almost six months since the beginning of the war, students and post-graduate students of the stationary form of study of foreign universities had the right to travel abroad. To cross the border, they provided the following documents: student card or student visa; translated and notarized documents on enrolment/study of a person in a foreign university; military registration documents with a record of granting them a deferral of conscription (conscription upon mobilization), a certificate issued by the territorial recruitment and social support centre for travel abroad for applicants of professional pre-university and higher education, trainee assistants, graduate students and doctoral students studying at across the border for full-time or dual forms of education.

However, on September 14, 2022, the State Border Service of Ukraine announced a ban on the departure of men who are students of foreign higher education institutions from Ukraine. At the same time, the reason for this decision of the top military leadership was the fact that the border guards daily detected people who tried to use fake documents, stating that they were students, and in this way illegally leave the borders of Ukraine. Hundreds of such forgeries could be discovered within a month.¹⁰ Thus, it can be stated that in the final result thousands of “real” Ukrainian students of foreign higher education institutions became the victims of the said decision of the top military leadership. After all, the law enforcement agencies were actually unprepared to check a significant number of falsified “documents” and bring

⁹ *Pro zatverdzhennya Pravyi peretynannya derzhavnoho kordonu hromadyanamy Ukrayiny, “Postanova Kabinetu Ministriv Ukrayiny” № 57 vid 27 sichnya 1995 roku*, <https://zakon.rada.gov.ua/laws/show/57-95-%D0%BF#Tex> [accessed: 02.09.2024].

¹⁰ *Vyyizd za kordon dlya studentiv obmezhenno*, <https://vseosvita.ua/c/news/post/7498> [accessed: 02.09.2024].

to justice the persons who used them. A further consequence was the actual impossibility of obtaining a higher education abroad for the majority of Ukrainian men of military age. After all, the question is logical: if students of permanent and dual education have a deferment from the draft, why can't they go to study at the foreign university where they entered? It is obvious that in this way the authorities are fighting not only with the above-mentioned flow of falsified documents, the authenticity of which can be easily checked if there is a desire on the part of law enforcement officers. It is also about preventing the use of loopholes in the law, which until recently allowed many persons (often at the age of 40 or 50) to "enter" studies at foreign universities with the aim of further travel abroad and actually avoiding mobilization. However, in our opinion, in this case, the rights of "real" students, who are also unjustifiably suspected of evading the draft, are limited.

During the last few months of 2024, the authorities have taken a number of steps that can be positively evaluated. In particular, by Resolution of the Cabinet of Ministers of Ukraine No. 366 dated April 2, 2024 "On Amendments to the Rules for Crossing the State Border by Citizens of Ukraine", certain categories of male students of Ukrainian higher educational institutions were allowed to leave to study in foreign higher educational institutions under the academic mobility program. At the same time, a number of requirements have been established for crossing the border, in particular: be aged from 18 to 22 years; not be subject to conscription for military service during mobilization; become a participant in academic mobility for one semester; to study full-time in institutions of higher education of state or communal forms of ownership; obtain a bachelor's degree in any specialty or a master's degree in medical, pharmaceutical or veterinary fields.¹¹

So, it can be argued that although there are certain relaxations regarding the departure of students to study abroad, there will still be a number of restrictions: age restrictions, restrictions on the form of education (full-time education), level of education (bachelor), with the exception of the already mentioned master's level medical, pharmaceutical or veterinary field, as well as the form of ownership of a higher educational institution (higher education institutions of state or communal forms of ownership). Also, the issue regarding the possibility of studying abroad for students who have entered foreign higher education institutions on a stationary form of education has not yet been resolved. We are talking at least about those students who have not reached the age of 25, that is, they cannot be mobilized into the Armed Forces of Ukraine without their consent.

¹¹ *Pro vnesennya zminy do Pravyl peretynannya derzhavnoho kordonu hromadyanamy Ukrainy, "Postanova Kabinetu Ministriv Ukrainy" № 366 vid 2 kvitnya 2024 roku*, <https://ips.ligazakon.net/document/kp240366?an=1> [accessed: 02.09.2024].

A separate issue concerns men of conscription age who permanently live abroad and have a corresponding mark in their foreign passport. Until recently, until the beginning of June 2024, this category of men had the right to leave Ukraine unhindered on the basis that they are residents of other countries and have a residence permit there. The State Border Service of Ukraine provided a corresponding explanation on its official website. According to this explanation, departure to a permanent place of residence abroad is a special procedure, the result of which is obtaining a permit from the State Migration Service of Ukraine. As part of the preparation of this document, approval of departure with the military commissariat is also provided for. That is, a man who has officially changed his place of permanent residence is not registered with any military commissariat of Ukraine, and therefore is not conscripted. In connection with this, he can safely cross the border and leave Ukraine.¹² However, on June 5, 2024, the State Border Service of Ukraine published completely different information, namely, it announced that starting from June 1, 2024, men of draft age who permanently live abroad and have a corresponding mark in their foreign passports will be removed from the list of persons who have the right to freely cross the border.¹³ At the same time, the specified information appeared on the DPSU website only a few days after such a ban came into effect.

3. LEGISLATIVE AMENDMENTS REGARDING MOBILIZATION DURING THE INTRODUCTION OF MARTIAL STATE IN UKRAINE

The Law contains a number of novelties designed to fill legal gaps and minimize opportunities for citizens to evade conscription, as a result of which the legal norms regarding the restriction of the right to freedom of movement for men of conscription age will become “transparent” and understandable not only to lawyers, but also to the majority of citizens of Ukraine “On Amendments to Certain Legislative Acts of Ukraine Regarding Certain Issues of Military Service, Mobilization, and Military Registration” dated April 11, 2024.¹⁴ In particular, the specified law details the right to

¹² *Yak choloviky, yaki postijno prozhyvayut' za kordonom, mozhut' vyyikhaty z Ukrainy: ekspert nazvav obov'yazkovu umovu*, <https://fakty.com.ua/ua/ukraine/suspilstvo/20230123-yak-choloviky-yaki-postijno-prozhyvayut-za-kordonom-mozhut-vyyihaty-z-ukrainy-ekspert-nazvav-obovyazkovu-umovu/> [accessed: 02.09.2024].

¹³ *Ukrayina prodovzhuye obmezhuvaty vyyezd cholovikiv pryzovnoho viku za kordon*, <https://www.lrt.lt/ua/novini/1263/2290221/ukrayina-prodovzhuie-obmezhuvaty-viyezd-cholovikiv-prizovnogo-viku-za-kordon> [accessed: 02.09.2024].

¹⁴ *Pro vnesennya zmin do deyakykh zakonodavchykh aktiv Ukrainy shchodo okremykh pytan' prokhodzhennya viys'kovoyi sluzhby, mobilizatsiyi ta viys'kovoho obliku: zakon Ukrainy vid 11 kvitnya 2024 roku*, “Vidomosti Verkhovnoyi Rady” (VVR), 2024, № 19, p. 78.

receive a deferment from the draft for students and post-graduate students of the stationary form of education. According to the provisions of this law, only those students who obtain a level of education that is higher than the previously obtained level of education will have such a right. That is, if a student enrolls in a permanent form of education after completing a bachelor's degree for a master's degree or for a postgraduate degree after obtaining a master's level of education, then he has the right to a deferment from the draft. If, after completing the master's degree, he enters a bachelor's or master's degree in another specialty, then in this case he loses the right to postpone the draft. There is no doubt that such legislative changes will make it possible to significantly reduce the number of male persons who obtained a second or third higher education of a stationary form of education at a fairly "mature" age.

According to Article 53 of the Constitution of Ukraine, "everyone has the right to education... Citizens have the right to obtain higher education free of charge in state and communal educational institutions on a competitive basis. That is, the Basic Law does not establish age limits for exercising the right to education. Such a constitutional norm in the conditions of the introduction of martial law in Ukraine allowed many Ukrainian citizens to use the legal "loophole" to abuse the right to education. It is about the fact that after the beginning of the Russian-Ukrainian war in 2022 approximately 85 thousand men entered higher education institutions, and in 2023 – 110 thousand men of conscription age. At the same time, the number of new male students over the age of 30 increased 23 times during 2022-2023. In particular, if in 2020 there were 1,700 male entrants aged 30-39, in 2021 – 2,186, then in 2022 – 30,277, and in 2023 – 43,720. A similar situation applies to male entrants over the age of 40 years old. If in 2020 there were 692 male entrants of this age, in 2021 – 884, then in 2022 – 15,055, and in 2023 – 27,728 people [Poya 2023].

The aforementioned law also excludes the category of "limited suitability" from the list of conclusions of the military medical commission, instead leaving two categories of persons: suitable and unsuitable for military service. Persons who were previously recognized as having limited suitability are required to undergo a medical examination again within nine months from the date of entry into force of this law. The list of diseases for which the military medical commission decides on unsuitable fitness or exemption from mobilization has also been updated.¹⁵

Thus, it can be stated that the number of men of draft age, who are recognized as unsuitable for military service due to their health, and therefore can travel abroad without hindrance, will decrease. At the same time, the right to

¹⁵ Ibid.

travel abroad to study in foreign higher education institutions under the academic mobility program will be granted to a certain number of students of permanent or dual education. The specified legislative amendments were adopted recently, the law entered into force on May 18, 2024, while the clarification of the data of conscripted citizens of Ukraine continued until July 16, 2024.

CONCLUSION

Today, it is difficult to talk about the extent of legislative restrictions on the constitutional right to freedom of movement during martial law in Ukraine. In fact, until the adoption by the Parliament of the Law of Ukraine “On Amendments to Certain Legislative Acts of Ukraine Regarding Certain Issues of Military Service, Mobilization, and Military Registration” dated April 11, 2024, which entered into force on May 18, 2024, it was possible to talk about quite chaotic activity a number of state bodies that are relevant to mobilization processes or to crossing the state border, and therefore to guaranteeing the right to freedom of movement in Ukraine. The adoption of the above-mentioned law by the Verkhovna Rada of Ukraine shows that, after all, in the third year of the full-scale Russian-Ukrainian war, the legislative body took the initiative in such a delicate and painful issue, which is the restriction of the constitutional right to freedom of movement in Ukraine under martial law hands. It will be possible to talk about the results of the application of this law a little later, when the specified legislative changes will finally begin to be implemented in practice. However, it should be remembered that the restriction of the constitutional right to freedom of movement in Ukraine should take place only on exclusively legal grounds. Only under the condition of compliance with the Constitution of Ukraine and relevant legislative acts, it will be possible to claim that the provisions of article 1 of the Basic Law are not declarative, and Ukraine, despite the need to introduce a number of restrictions on the constitutional rights and freedoms of man and citizen in the interests of national security, is democratic and legal state.

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