

Tip Sheet: Crimean Entities Appear in Both Russian and Ukrainian Company Registers

In the wake of Russia's 2014 annexation of Ukraine's Crimean Peninsula — and its subsequent support of the separatist-occupied Luhansk and Donetsk territories — Sayari has conducted an investigation into legal entities caught in the middle of the conflict. The majority of the entities examined were central to Ukraine's defense production capabilities prior to the outbreak of war and thus, have become key points of interest for the Russian defense apparatus.

This tip sheet highlights the new administrative reality for Ukrainian legal entities located on the Crimean Peninsula at the time of annexation and will provide clarity on how best to find them across two jurisdictions: Russia and Ukraine.

Dueling Administrative Realities

Since 2014, the Russian government has gone to great lengths to quickly legitimize its annexation of the Crimean Peninsula in the face of global condemnation and a failure to secure unanimous recognition. One of the ways in which this has occurred is through the inclusion of Crimean legal entities into the Russia's tax register, the Unified State Register of Legal Entities (EGRUL).

Crimean entities appear in EGRUL just as their Russian counterparts do. Filings for these two classes of entities are mostly identical with the former typically bearing no reference to the annexation. Rather, they will almost always bear a 2014 registration date, which is treated as the start date of the company. This, administratively speaking, erases the pre-annexation, Ukrainian history of the legal entity.

To make matters worse, the original Ukrainian names of the entities are not preserved and are instead replaced with Russian ones. This can make linking Ukrainian and Russian corporate records for Crimean legal entities extremely difficult.

Fortunately, Ukraine still maintains records for Crimean legal entities in the Ministry of Justice Register. Through this resource, it is possible to trace the pre-annexation history of these legal entities, as well as keep track of administrative changes to them since annexation. While a key element of the annexation process is to erase any doubt that the Crimean Peninsula — and any



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legal entities there — were ever anything but Russian, public records tell a different story altogether.