



SECURITY SERVICE OF UKRAINE

Main Investigative Directorate

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NOTIFICATION OF SUSPICION

Kyiv

August 25, 2024

Senior investigator of major cases of the 1st Unit of the 3rd Pre-Trial Investigation Directorate of the Main Investigation Directorate of the Security Service of Ukraine, lieutenant colonel of justice Frolov Roman Mykhailovych, having considered the materials of the pre-trial investigation, which was entered on 17 August 2022 in the Unified Register of Pre-trial Investigations under No. 22022250000000190, and having established the existence of sufficient evidence to suspect a person of committing criminal offences, in accordance with Articles 2, 36, 40, 42, 276-278 of the Code of Criminal Procedure of Ukraine,

NOTIFIED:

SHARIFI MOLASARAEI - ABBAS MOUSA, born on 08 April 1986, a native of Tehran, Islamic Republic of Iran, place of residence: unknown, passport G10520337, citizen of the Islamic Republic of Iran, brigadier general of the Guard Corps of the Islamic Revolutionary Guard Corps

of suspicion of aiding and abetting in the conduct of aggressive war upon prior conspiracy by a group of persons, i.e. a criminal offence under **part 5 of Article 27, part 2 of Article 28, part 2 of Article 437 of the Criminal Code of Ukraine**, as well as violation of laws and customs of war stipulated by international treaties ratified by the Verkhovna Rada of Ukraine, upon prior conspiracy by a group of persons, i.e. a criminal offence under **part 2 Article 28, part 1 Article 438 of the Criminal Code of Ukraine**.

Circumstances of the criminal offences of which Sharifi M.A. is suspected:

From 20 February 2014, representatives of the russian federation (hereinafter referred to as russia) launched an armed invasion by the russian armed forces, concealed by the statement of the russian leaders about the movement of military

units within a routine rotation of the Black Sea Fleet forces, which in cooperation with the Russian Black Sea fleet and other units of the Russian armed forces blocked and seized administrative buildings and key military and civilian infrastructure of Ukraine, and ensured a military occupation of the territory of the Autonomous Republic of Crimea and the city of Sevastopol. On 18 March 2014, Russia announced the official incorporation of Crimea into the Russian Federation.

At the same time, during March and early April 2014, under direct guidance and control of the Russian authorities and Russian armed forces, representatives of irregular illegal armed groups, armed gangs and mercenary groups, created, subordinated, managed and financed by the Russian Federation, took control of the buildings housing Ukrainian local authorities and local executive bodies, as well as military facilities of Ukraine in certain districts of Donetsk and Luhansk regions of Ukraine. On 07 April 2014, the terrorist organization 'Donetsk People's Republic' (hereinafter - 'DPR') was established in Donetsk, and on 27 April 2014, the terrorist organization 'Luhansk People's Republic' (hereinafter - 'LPR') was established in Luhansk, which formed illegal armed groups that are still functioning today.

As a result of military operations between May and August 2015, the Ukrainian defence forces liberated part of the previously occupied territories of Donetsk and Luhansk regions.

On 24 February 2022, continuing the implementation of the criminal intent to change the boundaries of the territory and state border of Ukraine, the president of the Russian Federation announced his decision to launch a 'special military operation' in Ukraine.

Since then, the units of the Russian armed forces and other military formations of the Russian Federation, the DPR and LPR under Russia's control, have been attempting to occupy the entire territory of Ukraine, which has been accompanied by the combat use of aviation, artillery and missile attacks, as well as the use of unmanned aerial vehicles and other weapons.

The strikes are carried out on objects protected by international humanitarian law, including residential buildings, shopping centres, medical and educational institutions, and energy facilities that are essential for the life of the civilian population. These actions have led to grave consequences in the form of deaths, including deaths of children, injuries of varying severity and material damage in the form of destruction of buildings, property and civilian infrastructure. According to UN General Assembly Resolution 3314 (XXIX) of 14 December 1974, such actions constitute acts of aggression.

This is confirmed by the UN General Assembly Resolutions No. ES-11/1 of 02 March 2022 and No. ES-11/2 of 24 March 2022, No. ES-11/4 of 12 October 2022, No. ES-11/5 of 14 November 2022, PACE Resolutions of 27 April 2022 and 26 January 2023.

According to the Resolution of the Verkhovna Rada [parliament of Ukraine] of 27 January 2015 No. 129-VIII *On the Appeal of the Verkhovna Rada of Ukraine to the United Nations, the European Parliament, the Parliamentary Assembly of the Council of Europe, the NATO Parliamentary Assembly, the OSCE Parliamentary Assembly, the GUAM Parliamentary Assembly, the National Parliaments of the*

World on Recognition of the Russian Federation as an Aggressor State, the Law of Ukraine of 24 February 2022 *On Approval of the Decree of the President of Ukraine 'On the Introduction of Martial Law in Ukraine'*, the Russian Federation is recognized as an aggressor state in relation to Ukraine.

At the same time, Ukraine, the Russian Federation, the Islamic Republic of Iran (hereinafter referred to as Iran) and other countries are members of the United Nations, which, in accordance with Article 2(4) of the UN Charter, refrain in their international relations from the threat or use of force against the territorial integrity or political independence of any state or in any other manner inconsistent with the Purposes of the United Nations.

Since the Russian armed forces failed to implement the plan to quickly capture all or most of Ukraine in February-March 2022, the Russian armed forces faced a shortage of weapons necessary to wage a long-lasting positional war.

To solve this problem, Russian top military and political leadership appealed to other states, in particular, Iran and North Korea, to supply the necessary weapons to wage war against Ukraine and train the Russian military personnel to use them.

In July-August 2022, representatives of the Russian armed forces under the leadership of Deputy Minister of Defence of the Russian Federation Alexei Yurievich Krivoruchko, born on 17 July 1975, entered into a criminal conspiracy with representatives of the Iranian Islamic Revolutionary Guard Corps (hereinafter referred to as IRGC) to purchase and supply weapons - *Shahed-136* and *Mohajer-6* unmanned aerial vehicles (hereinafter referred to as UAVs), their components, as well as training of the Russian armed forces by the Iranian specialists to use *Shahed-136* and *Mohajer-6* UAVs for further use of these UAVs in the military operations against Ukraine.

As a result of the agreements reached, in August-September 2022, representatives of the IRGC supplied the Russian armed forces with at least 1,500 *Shahed-136* and *Mohajer-6* UAVs through shell companies.

In order to train the Russian armed forces' servicemen in operating UAVs, representatives of the Islamic Republic of Iran in August 2022 allocated a brigade of instructors from the Iranian IRGC military, who specialized in the use of attack UAVs such as *Shahed-136*, *Mohajer 6*, consisting of:

- Sharifi Molasaraei Abbas Mousa, d.o.b.: 08 April 1966, brigade commander, rank - general;
- Kamalvand Babak Yadolaah, d.o.b.: 07 February 1971, rank - major;
- Tagik Gamal Abad Reza Ezatollah, d.o.b.: 01 March 1981, rank - major;
- Bahrami Hossein Ali Mohammad, d.o.b.: 13 January 1971, rank - major;
- Nikoo Asadallah Noor Mohammad, d.o.b.: 21 January 1973, rank - major;
- Mozafri Nia Morteza Hossein, d.o.b.: 21 March 1984, rank - major;
- Sabetian Hamid Reza Ali Jan, d.o.b.: 28 October 1971;
- Mahmoudi Ali Asghar Seifollah, d.o.b.: 10 April 1978.

Aware that the Iranian UAVs would be used by the Russian armed forces to strike on the territory of Ukraine, Sharifi Molasaraei Abbas Mousa and others, at a time not established by the pre-trial investigation, but no later than 13 August 2022, agreed to train the military of the Russian armed forces in this regard.

To conduct such training, a delegation of Iranian instructors led by Sharifi Molasaraei Abbas Mousa visited a training ground near Ashuluk, Astrakhan region of the Russian Federation, from 13 August to 09 September 2022, where they trained the Russian armed forces on the basics of bringing Iranian-made UAVs to combat readiness, flight programming, control, maintenance and combat use of loitering munitions *Shahed-136*, under the changed name *Geran-2*, and *Mohajer-6*.

On September 10, 2022, Sharifi Molasaraei Abbas Mousa, together with the above-mentioned Iranian instructors, arrived in the temporarily occupied territory of the Autonomous Republic of Crimea (hereinafter – the Crimea), where they set up equipment for launching loitering munitions *Shahed-136* and *Mohajer-6*, and continued training the military servicemen of the Russian armed forces in their use.

Subsequently, Iranian instructors under the leadership of Sharifi Molasaraei Abbas Mousa, acting intentionally, realizing the socially dangerous nature of their criminal actions aimed at aiding the aggressor state in waging war against Ukraine, foreseeing the socially dangerous consequences of their unlawful actions and deliberately wishing for their occurrence, during September-October 2023, assisted the servicemen of the Russian armed forces in the occupied territories of the Crimea and Kherson region, where they trained the Russian personnel in the combat use of *Shahed-136* and *Mohajer-6* UAVs, and directly participated in the launch of these types of UAVs to strike civilian infrastructure.

In total, between September and October 2022, this group of Iranian instructors, together with the Russian armed forces, launched at least 20 *Shahed-136* and *Mohajer-6* UAVs, striking civilian infrastructure on the territory of Ukraine, which resulted in the destruction and damage of buildings, structures, property and other social infrastructure protected by international humanitarian law.

At the same time, Sharifi Molasaraei Abbas Mousa was aware that by training the Russian armed forces in the use of UAVs, he was actually forming a separate type of Russian troops that would significantly affect the course of hostilities and cause greatest losses to Ukraine beyond the line of direct engagement. Thus, Sharifi Molasaraei Abbas Mousa has largely led Russia's military actions.

Subsequently, the Iranian-made *Shahed-136* UAV became an effective tool in the conduct of an aggressive war against Ukraine. The Russian armed forces have adopted the *Shahed-136* UAV and its manufacturing technology and started its mass production in Russia.

The servicemen of Russian armed forces, trained by Iranian instructors, continued to train other Russian servicemen in the use of UAVs, which allowed them to use this type of weapon along the entire front line and significantly influenced the course of the war.

From September 2022 to August 2024, at least 5,900 cases of launches of UAVs of the *Shahed-136* type at civilian infrastructure facilities in Ukraine have been established, which led to serious consequences in the form of the death of 80

civilians, at least 375 people suffered bodily injuries of different severity, particularly large-scale material damage has been caused to Ukraine in the form of destruction and damage of buildings, structures, property and other objects protected by international humanitarian law.

Thus, Sharifi Molasaraei Abbas Mousa, acting jointly with other members of the Iranian IRGC as the head of the delegation of Iranian instructors, became an accomplice in the conduct of an aggressive war, committed intentional actions that were expressed in assisting the aggressor state in training, practical training of the Russian armed forces military personnel for the combat use of UAVs, as well as the direct use of Iranian-made UAVs, in order to harm Ukraine.

Thus, Sharifi Molasaraei Abbas Mousa, acting jointly with other members of the Iranian IRGC, as the head of the delegation of Iranian instructors, deliberately trained and prepared the Russian armed forces for the combat use of UAVs during the aggressive war against Ukraine, which led to serious consequences in the form of deaths of Ukrainian citizens and damage to civilian objects, i.e. by giving advice and instructions he assisted Russia's military and political leadership in committing aggression against Ukraine.

Hence, Sharifi Molasaraei Abbas Mousa is reasonably suspected of intentional actions aimed at assisting the aggressor state (aiding and abetting) in the conduct of an aggressive war, by prior conspiracy by a group of persons, i.e. in committing a criminal offense under Part 5 of Article 27, Part 2 of Article 28, Part 2 of Article 437 of the Criminal Code of Ukraine.

For the successful implementation of the criminal plan aimed at waging an aggressive war against Ukraine by inflicting massive fire damage on civilian and critical infrastructure, representatives of the Russian top military and political leadership engaged Iranian IRGC instructors specializing in the use of *Shahed-136* and *Mohajer-6* attack UAVs.

In particular, IRGC brigadier general Sharifi Molasaraei Abbas Mousa headed the delegation of Iranian instructors: Kamalvand Babak Yadolaah, Tagik Gamal Abad Reza Ezatollah, Bahrami Hossein Ali Mohammad, Nikoo Asadallah Noor Mohammad, Mozafri Nia Morteza Hossein, Sabetian Hamid Reza, Ali Jan, Mahmoudi Ali Asghar Seifollax, on September 10, 2022, arrived in the occupied territory of the Crimea to train the Russian armed forces, to prepare for combat use of the UAVs, as well as to directly use Iranian-made UAVs to strike civilian infrastructure on the territory of Ukraine, protected by international law.

Executing a joint criminal plan aimed at waging an aggressive war against Ukraine, Sharifi Molasaraei Abbas Mousa acted intentionally, upon prior conspiracy with the above-mentioned Iranian instructors and servicemen of the Russian armed forces, aware of the socially dangerous consequences of his criminal actions in the form of death and injury of a large number of people, causing property damage, creating unsuitable conditions for the existence of the civilian population of Ukraine, wishing for their occurrence, in violation of Article 25 of the Regulations Regarding the Laws and Customs of War on Land, annexed to the IV Convention relative to the Laws and Customs of War on Land of October 18, 1907, Article 33 of the Convention relative to the Protection of Civilian Persons in Time of War of August

12, 1949, Articles 51, 52, 54, 57 of the Protocol Additional to the Geneva Conventions of August 12, 1949, and Relating to the Protection of Victims of International Armed Conflicts (Protocol I) of June 8, 1977, were fired upon using Iranian-made *Shahed-136* UAVs, in particular:

On September 15, 2022, at approximately 01:32 am and again at 02:30 am, 04:20 am the UAVs *Shahed-136* marked **M 233**, **M 229** and others struck civilian infrastructure facilities - the building of the dispensary of PJSC «Nikopol Ferroalloy Plant», the building of the municipal institution «Nikopol Cultural and Leisure Center», the premises and equipment of the traction station «Nikopol» of the 35 KV switchgear, PJSC «Ukrzaliznytsia», located in Nikopol, Dnipropetrovsk region, which led to significant damage to these facilities.

On September 17, 2022, at approximately 01:45 am a UAV *Shahed-136* with the marking **M 218** struck civilian infrastructure facilities - warehouse buildings and mechanical current of the private enterprise AF «Borysfen», located in the village of Vyschetarasivka, Myrovska territorial community, Nikopol district, Dnipro region, which led to significant damage to the above-mentioned facilities.

On September 20, 2022, at approximately 03:00 am a UAV *Shahed-136* with the marking **M 214** struck at the civilian infrastructure - the premises of the building of the office of the SE USPA «Delta Pilot», located in Ochakiv, Mykolaiv region, which led to significant damage to the facility.

Hence, Sharifi Molasaraei Abbas Mousa is reasonably suspected of violating the laws and customs of war provided for by international treaties ratified by the Verkhovna Rada of Ukraine, by prior conspiracy by a group of people, i.e. committing a criminal offense under Part 2 of Article 28, Part 1 of Article 438 of the Criminal Code of Ukraine.

**Senior Investigator of Major Cases of the 1st Unit
3rd Pre-trial Investigation Directorate
Main Investigation Directorate of the SSU
lieutenant colonel of justice**

Roman FROLOV

**APPROVED by
Prosecutor of the 1st unit
Directorate of Procedural Guidance
and Support of Public Prosecution
Department for Combating Crimes Committed
in the Conditions of Armed Conflict
Prosecutor General's Office**

Andriy OLIYNYK

23. 08 2024

Under Article 277, 42 of the Criminal Procedure Code of Ukraine, the suspect was explained his rights:

- 1) know of which criminal offense he has been suspected;
- 2) be clearly and timely informed about rights under the Criminal Procedure Code of Ukraine, as well as to be clarified of them;
- 3) have, on first demand, a counsel and consultation with him prior to the first and each subsequent interview under conditions ensuring confidentiality of communication and also upon the first interview to have such consultations with no limits as to their number or duration; the right to the presence of defense counsel during interviews and other procedural actions, refuse from services of counsel at any time in the course of criminal proceedings; have services of a counsel provided at the cost of the state in the cases stipulated for in the Criminal Procedure Code of Ukraine and/or the law regulating provision of legal aid at no cost, including when no resources are available to pay for such counsel;
- 4) keep silence about suspicion against him or waive answering questions at any time;
- 5) give explanations, statements about the suspicion or refuse to give them at any time;
- 6) demand verification of the validity of the detention;
- 7) in the case of detention or custody have his family members, close relatives or other persons promptly notified of his detention and whereabouts under Article 213 of this Code;
- 8) collect and submit evidence to investigator, prosecutor, investigating judge;
- 9) participate in procedural actions;
- 10) during procedural actions ask questions, submit comments and objections in respect of the manner in which procedural action is conducted which should be put on the record;
- 11) use technical means in compliance with the requirements of the Criminal Procedure Code of Ukraine in the course of procedural actions he participates in. Investigator, prosecutor, investigating judge, court may prohibit the use of technical means in the course of a specific procedural action or at a specific stage of criminal proceedings in order not to disclose confidential information protected by law or related to the intimate life of the person concerned, and a reasoned decision (ruling) should be taken (adopted) thereon;
- 12) submit motions to conduct procedural actions, ensure protection for himself, family members, close relatives, property and house, etc.;
- 13) propose disqualifications;
- 14) review files of pre-trial investigation under Article 221 of this Code and request disclosure of files under Article 290 of this Code;
- 15) receive copies of procedural documents and written notices;
- 16) challenge decisions, actions and inactivity by investigator, prosecutor, investigating judge under this Code;
- 17) demand that damage caused by illegal decisions, actions or inactivity of the agency conducting investigative activities, pre-trial investigation, prosecutor's

office or court, be indemnified, in accordance with the procedure established by law, as well as have his reputation, if the suspicion has not been confirmed;

18) use native language, obtain copies of procedural documents in his native language or another language of which he has command, and if necessary, benefit from translation services at the state expense.

A suspect who is a foreigner and a prisoner has the right to meet with a representative of the diplomatic or consular mission of his/her country, which the administration of the place of detention is obliged to provide.

A suspect also has other procedural rights provided for by this Code.

A suspect shall be handed a memo on his/her procedural rights and obligations along with their notification by the person who provides such notification.

Suspect / _____ / _____

_____, 202_

I have been notified of the suspicion, the notice of suspicion has been served, the rights of the suspect have been informed and explained.

Suspect / _____ / _____

_____, 202_

Defense counsel / _____ /

_____, 202_

The notification of suspicion has been served by:

**Senior Investigator of Major Cases of the 1st Unit
3rd Pre-trial Investigation Directorate
Main Investigation Directorate
Security Service of Ukraine
lieutenant colonel of justice**

Roman FROLOV