Observatoire ARGA

POLITICAL–ENVIRONMENTAL RETALIATION, CRIMINALIZATION OF AN ENTREPRENEUR, AND TRANSNATIONAL ASSET STRIPPING:

THE CASE OF OLEG MITVOL AS A MODEL OF ABUSE OF CRIMINAL JUSTICE AND INDICATORS OF AN ORGANIZED SCHEME (PRELIMINARY RICO-ORIENTED ASSESSMENT)

Preliminary analytical report by Observatoire ARGA for subsequent submission to competent U.S. authorities and international institutions

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I. Purpose of the Report and Its Procedural Status

This report has been prepared by Observatoire ARGA as a preliminary analytical material (prior disclosure) intended for institutional review by competent authorities of the United States (including units responsible for combating transnational organized crime and financial crime) and by international bodies, as well as for the preservation of an evidentiary record demonstrating that the events surrounding Oleg Mitvol bear the hallmarks of a political-economic conflict accompanied by:

- the criminalization and isolation of the applicant/human rights defender;
- economic seizure of assets and redistribution of contracts;
- subsequent transnational criminal acts involving the theft of property and funds in the UAE through the use of forged powers of attorney and cryptocurrency infrastructure.

This report does not constitute a criminal indictment and does not replace procedural documents of law enforcement authorities. Its purpose is to present structured, verifiable factual material, demonstrate chronology, economic consequences, and indicators of a sustained scheme (enterprise/pattern), and to outline legal elements potentially relevant to an assessment under RICO and related U.S. federal statutes, should jurisdictional nexuses be established.

II. Methodology and Sources

1. Documentary materials available to Observatoire ARGA include:

— an application to the INTERPOL Commission for the Control of Files (CCF) regarding Oleg Mitvol, describing transnational episodes involving forged powers of attorney, withdrawals of funds from First Abu Dhabi Bank, attempts to sell property in the UAE, and a crypto trail (AWX/AWEX), and formulating requests to determine the existence/removal of data in INTERPOL systems and to record “victim” status in the relevant notes.

— a decision of the Smolensk City Court (30.09.2024, case No. 2-2205/2024, translation) recognizing as void the powers of attorney allegedly issued on Mitvol’s behalf, and declaring invalid the transaction involving withdrawals from First Abu Dhabi Bank (Mirdif City Centre, Dubai, UAE) during the period 03.03.2023–07.03.2023, as well as recording the fact that Mitvol was in custody during the period when the powers of attorney were allegedly “issued”.

— information memoranda on unlawful actions against Mitvol (versions 1 and 2), including SIM-swap episodes, theft in the Russian Federation (including Tinkoff), episodes in the UAE, a chronology of the detention of suspects, information on the use of AWEX/AWX and on procedural actions/refusals to examine the crypto trail; as well as a block of hypotheses regarding the criminal case and the economic redistribution of contracts.

— the judgment in the Magomedselimova case (19.05.2025, Krasnoyarsk, translation), describing an organized group, the mechanism for producing forged documents, legalization of powers of attorney, travel to the UAE, operations to withdraw/transfer funds, use of a banking application and ProtonMail/mobile infrastructure, as well as an attempt to seize rights to real estate.

— a response from the Prosecutor’s Office of Krasnoyarsk Krai (2025) concerning verification of the version involving the use of the “AWX” crypto exchange and the organization of a procedural review under Article 174.1 of the Criminal Code of the Russian Federation (money laundering),

as well as the submission of an inquiry to the Russian service office of the crypto exchange and a repeat inspection of the device.

— analytical lists of indicators and circumstances for assessing prospects of a RICO-related submission (enterprise structure, use of state bodies as an instrument for business seizure, causal link to loss of a contract/asset, international financial elements, repetition of the scheme).

— “Position No. 1” and “Position No. 2” (legal and factual defense arguments), containing a description of the acquisition and management of JSC “Krasnoyarsk Trust of Engineering and Construction Surveys” (NIF 2460066205), events since 2018, circumstances of the 2019 state contract, theses regarding jurisdiction/involvement of the FSB, the repressive nature of the preventive measure, threats and creation of conditions for loss of control over assets, as well as a hypothesis of forceful corporate raiding and redistribution of the project in favor of other entities.

2. Public sources (to corroborate the context of the environmental disaster and its financial-legal consequences), included in this version of the report in a limited scope:

— the diesel fuel spill in Norilsk on 29.05.2020 at CHPP-3, owned by NTEK (a subsidiary of Norilsk Nickel), estimated at approximately 21,000 tons and recognized as one of the largest in modern Russian history.

— court-ordered recovery/compensation of damage in the amount of approximately 146 billion rubles (in some sources: 146.2 billion), recognition of this recovery as record-breaking, and reports of actual payment of the compensation.

— Reuters reports on regulator claims and public debate surrounding damage assessment and corporate liability.

— information on the sentence imposed on Oleg Mitvol (4 years and 6 months of imprisonment) in the case concerning fraud in the design/construction of the Krasnoyarsk metro.

— the refusal of the Supreme Court of the Russian Federation to review the sentence (as an indicator of exhaustion of part of domestic remedies).

III. Context: the Norilsk Environmental Disaster and Its Legal Consequences

On 29 May 2020, an accident occurred at CHPP-3 of the Norilsk-Taimyr Energy Company (NTEK), a subsidiary of Norilsk Nickel, involving the failure of a fuel storage tank and resulting in a large-scale diesel fuel spill. In public sources, the incident is described as one of the largest environmental disasters in the Arctic zone of the Russian Federation; estimates of the spill volume amount to approximately 21,000 tons, with references to the distribution of contamination between soil and water bodies, as well as multiple exceedances of maximum permissible concentrations according to data from regulatory authorities.

In 2021, a Russian court ordered compensation for environmental damage related to this spill in the amount of approximately 146 billion rubles (some publications cite 146.2 billion rubles), which was characterized as a record recovery/compensation for environmental harm. A number of sources indicate that Norilsk Nickel did not challenge the decision and reported full payment of the compensation; the corporate disclosure provided a breakdown of the allocation of amounts (including damage to water bodies and soils).

In this context, Oleg Mitvol, publicly positioned as an environmental advocate/former environmental official, appears in the public discourse surrounding environmental damage, the liability of industrial corporations, and law enforcement in the field of environmental protection. This report proceeds from the hypothesis that subsequent events involving Mitvol should not be assessed in isolation as an "ordinary economic criminal case," but rather as an element of a political-economic conflict in which the applicant's environmental advocacy and public profile may have served as a factor of retaliation.

IV. The Case of Oleg Mitvol: Basic Chronology and Key Legal Milestones (Based on Observatoire ARGA Documents)

1. Acquisition and Development of the Company (2018–2019)

According to the materials of the "Position," in early 2018 Oleg Mitvol acquired, at auction, JSC "Krasnoyarsk Trust of Engineering and Construction Surveys" (NIF 2460066205), after which he invested in its development, equipment upgrades, and recruitment of specialists; by 2019, the company possessed the capacity to perform complex surveying and design works.

On 09.09.2019, following competitive procurement procedures, State Contract No. 22 was concluded for the adjustment of design and estimate documentation for the construction of the first line of the Krasnoyarsk metro; the contract price amounted to 954 million rubles.

2. Initiation of Criminal Proceedings and Preventive Measures (2022–2023)

According to the "Position," a criminal case under Article 159(4) of the Criminal Code of the Russian Federation was initiated on 22.05.2022 (the materials also refer to case No. 122207040001000028). The document emphasizes that the investigation was conducted by the Federal Security Service (FSB), which the authors of the position interpret as an indicator of deviation from ordinary jurisdictional rules and as a factor increasing the risk of political steering of the process.

The actual detention is recorded as having taken place on 08.06.2022; on 10.06.2022, the court ordered pre-trial detention as the preventive measure. These circumstances are reflected in the memoranda on unlawful actions and correspond to public reports of detention.

On 14.09.2023, it was publicly reported that Oleg Mitvol was sentenced to 4 years and 6 months of imprisonment in a case concerning fraud related to the design/construction of the Krasnoyarsk metro; references were made to a "special procedure" of adjudication and to his immediate remand into custody in the courtroom.

3. Economic Effect and Redistribution of the Project (2019–2022) — Based on Observatoire ARGA Materials

According to "Information_unlawful_actions_2," following the events of 2021–2022, a significant redistribution of the project framework took place: on 10.08.2022, a contract No. 2-08/2022 was concluded between the State Public Institution of Krasnoyarsk Krai "Center for Transport Logistics" and JSC "Mosproekt-3" for the development of design documentation for an underground–aboveground light rail transport system in the city of Krasnoyarsk; the contract price exceeded 87 billion rubles, with design and survey works valued at 4.25 billion rubles. The document compares these figures as being multiple times higher than those under the previously concluded 2019 contract.

The same document contains information on the political-administrative context (references to meetings/protocol decisions, transfer of documentation, the role of an infrastructure budget loan, changes in the project concept, and subsequent dynamics), which is considered as a possible motive for the redistribution of economic benefits and the removal of a competitive participant through criminalization.

V. Transnational Asset Seizure and Indicators of an Organized Scheme: the "UAE — Forged Powers of Attorney — Crypto Trail" Block (Based on Observatoire ARGA Documents)

1. Forged Powers of Attorney and Withdrawals from First Abu Dhabi Bank

According to the decision of the Smolensk City Court dated 30.09.2024 (case No. 2-2205/2024), the powers of attorney allegedly issued on behalf of Mitvol on 24.12.2022 by a notary in Smolensk in favor of E.V. Magomedselimova, granting authority to manage accounts at First Abu Dhabi Bank (Dubai, Mirdif City Centre) and to sell real estate in the UAE, were declared null and void. The court established that during the period when the powers of attorney were purportedly "signed," Mitvol was in custody and physically could not have performed such actions.

The same decision records that, on the basis of the disputed power of attorney, funds were withdrawn from Mitvol's account at First Abu Dhabi Bank in the amount of AED 5,458,353.95 during the period from 03.03.2023 to 07.03.2023, and the corresponding "transaction" was declared invalid.

2. Criminal-Law Establishment of an Organized Group and the Operational Mechanism

The judgment of 19.05.2025 in the Magomedselimova case (Krasnoyarsk) describes the structure of an organized group and its preparatory actions (obtaining information about accounts and real estate, production of forged documents, legalization of powers of attorney), travel to the UAE, interaction with the bank, installation/use of mobile applications and electronic channels (including changes of e-mail, use of ProtonMail, mobile linkage), operations involving withdrawals and transfers in dirhams, as well as an episode involving preparation to seize rights to real estate in the UAE.

3. Cryptocurrency Infrastructure (AWEX/AWX) and Procedural Review of Money Laundering Indicators

The "Information on Unlawful Actions" records that the issue of the distribution of funds remained unresolved in the investigation, and that references were made to the "AWEX" application for cryptocurrency transactions; the defense pointed to the need for repeated inspections of devices and expert examinations, but encountered refusals.

A response from the Prosecutor's Office of Krasnoyarsk Krai confirms that the version involving the use of the "AWX" crypto exchange to transfer the misappropriated funds is being examined: a repeat inspection of the device was conducted, an inquiry was sent to the Russian service office of the crypto exchange, and a procedural review was initiated under Article 174.1 of the Criminal Code of the Russian Federation, which, as of the date of the response, had not been completed.

4. International Dimension and INTERPOL

In the application to the INTERPOL Commission for the Control of Files (CCF), prepared on behalf of the representative, the position is articulated that Mitvol is a victim of transnational fraud and theft, and that any representation of him in INTERPOL systems as an offender within the framework of the described episodes is inaccurate and contrary to judicial findings; separate requests are made to verify the existence of data, obtain access, ensure deletion, and record victim status.

VI. Systemic Interpretation: Indicators of "Enterprise" and "Pattern" as a Model of Political-Economic Asset Seizure

On the basis of the totality of documents held by Observatoire ARGA, a sequence of events can be traced which, in analytical terms, may be described as a model comprising:

1. the emergence of a highly conflictual public context (environmental damage, legal consequences for a major corporation, record recovery/compensation of approximately 146 billion rubles);
2. the initiation and implementation of criminal prosecution with the application of harsh isolation measures and restrictions reducing the individual's ability to control corporate and property assets;
3. the economic effect: loss of control over the company and destruction/redistribution of the project and contractual framework (in the materials, a comparison of the 2019 and 2022 contracts and the transfer of project architecture to other entities);
4. parallel and subsequent transnational theft of assets through forged documents, banking channels, mobile identifiers, and crypto instruments (UAE, First Abu Dhabi Bank, forged powers of attorney, AWEX/AWX), including indicators of an organized group and role distribution.

Such a configuration of events is of interest for international assessment for the following reasons:

a) a linkage is observed between "repressive criminal prosecution — economic loss — transnational withdrawal/theft";

b) transactions and infrastructure extend beyond a single jurisdiction (UAE, crypto instruments);

c) the documents contain judicial findings on the nullity of the powers of attorney and the invalidity of the transactions, forming a legally significant basis for the international qualification of "victim" status.

VII. Preliminary Legal Framework for the United States: Assessment Benchmarks (Without an Assertion of Guilt)

Observatoire ARGA characterizes the present stage as a *preliminary RICO-oriented assessment*: an evaluation of indicators which, subject to confirmation of the relevant jurisdictional nexuses (U.S. nexus), may be relevant for consideration by competent U.S. authorities.

In the internal indicator lists appended to the report (RICO checklists), the following possible lines of inquiry are identified:

— the existence of a stable group of persons and a distribution of roles among administrative, security, corporate, and nominal participants (enterprise);

— the use of criminal prosecution and procedural restrictions as an instrument for the seizure of business and assets;

— a causal link between the actions of the group and measurable economic harm (loss of a company/contracts/revenues);

— indicators of subsequent legalization (money laundering) through crypto channels and international financial infrastructure (including AWX/AWEX; procedural review under Article 174.1 of the Criminal Code of the Russian Federation);

— repetition of the scheme (pattern) and the international element (inter-jurisdictional operations, digital communications, crypto).

This report deliberately does not substitute for the competence of U.S. authorities: it records the structure of the evidentiary corpus and proposes a verifiable factual map for further examination.

VIII. List of Key Facts Documented by Observatoire ARGA (Non-Exhaustive)

1. Judicial confirmation of the invalidity of powers of attorney and transactions in the UAE (Smolensk, 30.09.2024; case No. 2-2205/2024).
2. Judicial confirmation of the withdrawal of AED 5,458,353.95 from First Abu Dhabi Bank (UAE, Dubai) on the basis of a power of attorney declared null and void.
3. Criminal-law description of an organized group and the mechanism of transnational theft/attempted seizure of property (judgment of 19.05.2025).
4. Documentation of the AWEX/AWX crypto trail as a subject of review, including an official prosecutorial response confirming a procedural review for indicators of money laundering (Article 174.1 of the Criminal Code of the Russian Federation).
5. A documented chronology of interventions and economic consequences within the Krasnoyarsk metro project framework, including a comparison of the 2019 and 2022 contracts and references to a change of project contractor and a multiple increase in the cost of design works.
6. The existence of a duly filed submission to the INTERPOL Commission for the Control of Files (CCF) requesting verification/access/deletion of data and the recording of victim status, with references to court decisions and banking materials.

IX. Conclusion

The materials assembled by Observatoire ARGA support the conclusion that the case of Oleg Mitvol should be examined as a complex political-economic conflict in which the criminalization of the individual and his isolation coincide in time and logic with the economic redistribution of assets and contracts, as well as with transnational criminal acts involving the theft of property in the UAE, followed by the formation of a crypto trail.

With regard to the environmental context, the report records that the diesel fuel spill in Norilsk (29.05.2020, NTEK/Norilsk Nickel) was recognized as an event of extraordinary scale, with an estimated volume of approximately 21,000 tons and record compensation/recovery of around 146

billion rubles. This creates an objective basis for the hypothesis of a high level of conflict and possible retaliation against public actors engaged in the environmental agenda.

This version of the report is intended for publication on the Observatoire ARGA platform and for subsequent submission to competent U.S. authorities as part of a package including court decisions, procedural documents, materials on transnational asset theft, correspondence/responses from supervisory authorities, and other annexes referenced in this report.

Annexes (Documentary Corpus of Observatoire ARGA)

— INTERPOL CCF submission (Mitvol).

— Smolensk Court default judgment dated 30.09.2024 (Case No. 2-2205/2024, translation).

— Informational summaries on unlawful actions (versions 1–2).

— Verdict dated 19.05.2025 (Magomedselimova case, translation).

— Prosecutor's response regarding AWX / Article 174.1 review.

— RICO indicator checklists (internal).

— Position papers Nos. 1–2.

List of references used in the report:

1. https://www.rbc.ru/business/10/03/2021/6048a2309a794732bec10c5d
2. https://ru.wikipedia.org/wiki/%D0%A0%D0%B0%D0%B7%D0%BB%D0%B8%D0%B2_%D0%B4%D0%B8%D0%B7%D0%B5%D0%BB%D1%8C%D0%BD%D0%BE%D0%B3%D0%BE_%D1%82%D0%BE%D0%BF%D0%BB%D0%B8%D0%B2%D0%B0_%D0%B2_%D0%9D%D0%BE%D1%80%D0%B8%D0%BB%D1%8C%D1%81%D0%BA%D0%B5
3. https://en.wikipedia.org/wiki/Norilsk_oil_spill
4. https://www.svoboda.org/a/31111090.html
5. https://www.vedomosti.ru/business/news/2021/02/11/857615-nornikel-poluchil-trebovanie-o-vozmeschenii-494-mln-rublei-za-razliv-topliva
6. https://ru.wikipedia.org/wiki/%D0%AD%D0%BA%D0%BE%D0%BB%D0%BE%D0%B3%D0%B8%D1%8F_%D0%9D%D0%BE%D1%80%D0%B8%D0%BB%D1%8C%D1%81%D0%BA%D0%B0
7. https://en.wikipedia.org/wiki/Norilsk_Nickel
8. https://en.wikipedia.org/wiki/Vladimir_Potanin

Reference to documents:

https://drive.google.com/drive/folders/1GeAWKbvpOzXOU8sec7VBqbsl5Rlw4S2W?usp=drive_link