



Asylum Research & Global Assistance



## **INSTITUTIONAL NOTICE AND EVIDENCE AVAILABILITY MEMORANDUM**

### **Concerning the Documentary, Analytical, and Testimonial Materials Available in Relation to PJSC TogliattiAzot (TOAZ)**

**Prepared by ARGA / Observatoire ARGA**

#### **1. Purpose of this Memorandum**

This Institutional Notice and Evidence Availability Memorandum is prepared by ARGA / Observatoire ARGA for the purpose of informing relevant institutions, organizations, professional bodies, research centres, compliance stakeholders, and other interested structures of the existence of a substantial documentary and analytical record concerning PJSC TogliattiAzot (TOAZ).

The memorandum does not constitute a complaint, legal claim, request for sanctions, request for restrictions, request for disqualification, or request for any action concerning any individual or entity. It does not ask any institution to adopt findings, initiate proceedings, or reach conclusions regarding liability, wrongdoing, or responsibility.

The purpose of this memorandum is limited to notifying interested structures that ARGA / Observatoire ARGA has accumulated, organized, preserved, and published a significant body of documentary, analytical, research, and testimonial materials concerning the TOAZ matter and that such materials may be made available, where appropriate, for independent review, research, compliance analysis, institutional assessment, or professional examination.

All determinations concerning the relevance, evidentiary value, legal significance, or institutional use of the materials remain exclusively within the competence of the receiving organizations and authorities.

#### **2. About ARGA**

Asylum Research & Global Assistance (ARGA) is an independent organization engaged in documentation, research, international case analysis, legal-process monitoring, human-rights work, compliance-oriented analysis, and institutional communication in complex cross-border matters.

ARGA's work focuses on the collection, systematization, preservation, and presentation of documentary materials relating to cases that involve multiple jurisdictions, legal proceedings, corporate disputes, human-rights concerns, compliance risks, sanctions-related contexts, and transnational reputational consequences.

ARGA does not act as a public authority, court, regulator, investigative body, or sanctions decision-maker. Its function is analytical and documentary. It collects and organizes information,

prepares institutional memoranda, produces research reports, preserves evidentiary materials, and communicates the existence of relevant documentation to competent or interested structures.

In the TOAZ matter, ARGA has acted as a documentation and analytical organization, preserving records connected with the corporate conflict surrounding PJSC TogliattiAzot, subsequent proceedings concerning former senior managers, international legal and compliance developments, and related public-interest issues.

### 3. About Observatoire ARGA

Observatoire ARGA is the analytical and research platform associated with ARGA. It is responsible for preparing structured reports, legal and institutional memoranda, documentary analyses, compliance-oriented briefings, public research materials, and evidence-based publications.

Observatoire ARGA operates as a research and analytical unit. Its role is to transform complex documentary records into institutionally usable formats, including master dossiers, analytical reports, chronological studies, evidence inventories, compliance memoranda, and public research summaries.

In relation to TOAZ, Observatoire ARGA has prepared several core analytical documents, including the international Master Dossier and the analytical report titled “Criminalization of Corporate Governance and Substitution of Justice: The Case of PJSC TogliattiAzot (TOAZ).”

The platform has also supported the preparation of further memoranda concerning corporate structures, financial flows, international proceedings, sanctions-compliance relevance, documentary evidence, and institutional notifications.

### 4. Scope of the TOAZ Research Work

The TOAZ research work developed over several stages. It began with the formation of a structured evidentiary base and later expanded into a broader international analytical and compliance-oriented project.

The research covers the corporate conflict surrounding PJSC TogliattiAzot, the change of corporate control on 27 November 2021, subsequent criminal and civil proceedings concerning former senior managers, issues relating to economic expert evidence, procedural materials, international submissions, Interpol-related matters, asylum and protection-related materials, financial and corporate structures, maritime and logistics operations, international compliance concerns, and reputational consequences.

The work also includes a public research-communication component consisting of documentary films and long-form interviews published on the Association’s YouTube channel. These materials were prepared to present the case in an accessible documentary format based on available documents, court materials, affidavits, witness accounts, international correspondence, and analytical work.

The research is not limited to one jurisdiction. Materials collected and analyzed by ARGA relate to Russia, the United States, the European Union, the United Kingdom, Ireland, France, Switzerland, Hong Kong, Singapore, the United Arab Emirates, Qatar, Australia, and several international organizations and institutional mechanisms.

## 5. Documentary Evidence Available

ARGA / Observatoire ARGA maintains a structured body of documentary evidence concerning the TOAZ matter.

The available materials include court documents, procedural filings, criminal-case materials, civil-case materials, expert reports, complaints, correspondence with public authorities, materials relating to international submissions, witness-related records, Interpol-related documents, asylum and humanitarian-protection materials, compliance submissions, publication records, and institutional correspondence.

A central element of the archive is the International Master Dossier concerning PJSC TogliattiAzot. The dossier consolidates factual chronology, key procedural developments, documentary references, and evidentiary materials into a single reference document.

The Master Dossier has been published in Zenodo with DOI: <https://doi.org/10.5281/zenodo.18201467>.

A second core document is the Observatoire ARGA analytical report “Criminalization of Corporate Governance and Substitution of Justice: The Case of PJSC TogliattiAzot (TOAZ).” This report provides a jurisdiction-neutral analytical framework for understanding the interaction between corporate governance disputes, criminal proceedings, procedural issues, and international consequences.

The analytical report has been published in Zenodo: <https://zenodo.org/records/18222405>.

In addition to these published materials, ARGA maintains structured evidence archives that may be made available to appropriate recipients subject to confidentiality, privacy, procedural, and source-protection considerations.

## 6. Witness and Testimonial Materials

ARGA / Observatoire ARGA has also accumulated witness and testimonial materials concerning the TOAZ matter.

These materials include statements, interviews, affidavits, accounts of former senior managers, explanations by legal representatives, and supporting materials provided by individuals with direct or indirect knowledge of relevant events.

Some testimonial materials concern the corporate history of TOAZ, the internal structure of the enterprise, export operations, financial and logistical arrangements, the change of corporate control, subsequent criminal proceedings, asset-related consequences, pressure on former managers, international proceedings, Interpol-related developments, and the impact of the case on individuals and families.

Witness materials are maintained separately from public analytical materials and may be provided only where appropriate. Their use requires attention to consent, confidentiality, source protection, privacy, and the legal status of the relevant testimony.

Where witness materials are provided, ARGA seeks to identify their procedural status clearly, including whether the material constitutes an affidavit, interview summary, personal account, declaration, legal submission, or supporting statement.

ARGA does not present witness testimony as independently established fact unless corroborated by documentary sources. The materials are preserved as part of the broader evidentiary record and may assist interested institutions in understanding the factual and procedural context of the case.

## 7. International Research and Institutional Work

The TOAZ project has involved extensive international research and institutional communication.

Materials have been prepared or transmitted to structures including United Nations mechanisms, Council of Europe channels, European Union institutions, OECD, FATF-related structures, Transparency International, UNODC, ICC Commercial Crime Services / FraudNet, U.S. federal institutions, Irish judicial and legal structures, French consular authorities, European information systems, and Australian governmental, parliamentary, academic, and compliance institutions.

The purpose of these communications has been to notify relevant structures of the existence of documented materials and to provide analytical context where the TOAZ matter may intersect with human rights, rule of law, corporate governance, financial integrity, AML, sanctions compliance, international legal cooperation, or reputational risk.

All such communications have been framed as informational and analytical submissions. They have not been presented as requests for sanctions, restrictions, investigations, disciplinary action, or measures against any particular person.

## 8. Publications and Repositories

ARGA / Observatoire ARGA has used international research repositories to preserve and publish key analytical materials.

The publication of materials in repositories such as Zenodo serves several functions. It provides a stable reference point, ensures version preservation, allows citation through DOI identifiers, and creates an independently accessible record of the analytical work conducted.

Published materials currently include the International Master Dossier concerning PJSC TogliattiAzot and the Observatoire ARGA analytical report. Additional analytical memoranda and compliance-related documents have also been prepared and may be available through repository publication or direct institutional transmission.

The use of repositories reflects ARGA's broader methodology: where appropriate, significant analytical materials are preserved through externally accessible platforms rather than remaining solely within internal case files.

## 9. Public Documentary and Research Communication Materials

In addition to legal and analytical documents, ARGA has prepared and published documentary films and long-form interviews concerning the TOAZ matter on the Association's YouTube channel.

As of the date of this memorandum, six documentary films or documentary interviews concerning TOAZ have been published.

These public materials cover the corporate conflict, the change of control, criminal proceedings against former senior managers, defence positions, expert-evidence issues, international

submissions, sanctions-compliance work, whistleblower-related frameworks, Interpol matters, and the personal testimony of former senior manager Nikolai Neplyuev.

The documentary workstream is distinct from formal legal and institutional submissions. Its function is public research communication and documentary presentation based on materials available to ARGA.

These films do not request action against any person or entity. They are part of ARGA's broader effort to make complex transnational cases understandable to a wider public while preserving the documentary and analytical basis of the work.

#### 10. Availability of Materials to Interested Structures

ARGA / Observatoire ARGAs is prepared, where appropriate, to make available relevant materials to interested organizations, institutions, research centres, professional bodies, regulators, academic units, compliance professionals, and other structures with a legitimate interest in reviewing the TOAZ matter.

Available materials may include:

the International Master Dossier;

the Observatoire ARGAs analytical report;

chronological summaries;

evidence inventories;

corporate-structure analyses;

international actions reports;

compliance memoranda;

witness-related materials;

public documentary materials;

institutional correspondence;

supporting documentary archives.

Access to certain materials may be subject to confidentiality, privacy, source-protection, procedural, or legal limitations. In particular, witness materials, personal data, asylum-related records, Interpol-related documents, and unpublished correspondence may require restricted handling.

Where full access is not appropriate, ARGAs may provide summaries, redacted versions, evidentiary indexes, or explanatory memoranda.

#### 11. Institutional Use of the Materials

The materials may be relevant to institutions or organizations conducting independent research or review concerning:

corporate governance;

international compliance;

sanctions-risk analysis;

sports integrity and reputation risk;

human-rights documentation;

cross-border corporate disputes;

financial integrity;

AML typologies;

misuse of legal mechanisms;

international legal cooperation;

witness protection;

reputational due diligence;

public-interest research.

ARGA does not ask any recipient to adopt ARGAs analysis or conclusions. The materials are made available to support independent assessment, institutional awareness, research, and professional evaluation.

## 12. Limitations and Neutrality Statement

This memorandum does not contain accusations against any person or entity.

It does not determine liability, guilt, responsibility, or legal wrongdoing.

It does not request sanctions, restrictions, exclusion, disqualification, disciplinary action, or investigation.

It does not ask any recipient to make any decision concerning a specific individual.

The memorandum is a notice of evidence availability and research work. Its purpose is to inform interested structures that a significant documentary and analytical record exists and may be provided for independent review where appropriate.

## 13. Conclusion

ARGA / Observatoire ARGA has accumulated a substantial body of documentary, analytical, testimonial, and research materials concerning PJSC TogliattiAzot and the international consequences of the corporate conflict surrounding the enterprise.

The materials have been organized through master dossiers, analytical reports, evidence archives, institutional submissions, repository publications, documentary films, and research communications.

This memorandum is intended to notify interested structures of the existence and availability of these materials.

ARGA / Observatoire ARGA remains available to provide further documentation, summaries, evidence indexes, analytical reports, or explanatory materials upon request and subject to applicable confidentiality, privacy, and source-protection considerations.