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Memorandum

Concerning Olga and Nikita Belov

21 May 2026

I, Khairtudinov Eduard Myansurovich, attorney of the «Priority» Law Office of the Moscow City Bar Association, having 34 years of professional experience as an attorney, registration number 77/3821, have familiarised myself, relying on publicly available information from open sources in the mass media, with the case concerning the deportation of citizens of Russia Olga and Nikita Belov, who left Russia in August 2022 for Finland and are residing in that country to the present time, for the purpose of assessing the risks arising in connection with their possible extradition to Russia.

From the said sources, the following material circumstances of the case of Olga and Nikita Belov have become known to me:

1. The departure from Russia of Olga Belova and her adult son Nikita is of a forced character. After the commencement of Russia's military actions against Ukraine in February 2022, Nikita Belov, who had been working since September 2021 at the Central Scientific Research Institute, was assigned to work on a project which, in his view, had a military purpose.
2. Since Nikita Belov, like many other citizens of Russia, from the very first days of the war openly took a firm anti-war position, he refused to participate in work on a project which in his opinion could be related to Russia's aggression against Ukraine. After this, threats began to be directed against him from the management of the Institute, including threats of physical reprisal, and ultimately he was dismissed from his employment allegedly for failure to appear at work.
3. In August 2022 Nikita Belov and his mother Olga left Russia for Finland, and on 02 September 2022 they applied to the authorities of Finland with a request to grant them political asylum.
4. While in Finland, Olga and Nikita Belov openly spoke out against the military actions of the Russian authorities and supported Ukraine. The Finnish newspaper Turun Sanomat wrote that the Belovs were cooperating with FinEst Volunteers in the Finnish town of Uusikaupunki. This organisation, according to the description on its website, provides assistance to civilians and members of the military of Ukraine. It is known

that Olga and Nikita Belov personally handed over to servicemen of the Ukrainian army a 3D printer and first-aid medical kits.

5. In December 2024 the migration service of Finland refused Olga and Nikita Belov the granting of political asylum. They appealed against this decision to the judicial bodies of Finland, but the court refused to grant their appeals.

6. On 24 April 2026 Olga and Nikita Belov were detained by the Finnish police for their subsequent deportation to Russia.

7. On 27 April 2026 the Administrative Court of Helsinki suspended the decision on the deportation of Olga and Nikita Belov until the completion of the consideration of their appeal or until the court issues a different ruling. On 28 April the Belovs were released home, but the question of their deportation to Russia remains open.

Since these factual circumstances, as far as I am aware, are not disputed by anyone, on the basis thereof and taking into account the legislation currently in force in Russia and the practice of its actual application, I am able to draw the following conclusions regarding the risks for Nikita and Olga Belov arising in connection with their possible extradition to Russia. At the same time, in my Memorandum I do not assess the likelihood of actual prosecution, but enumerate those norms of the criminal legislation of the Russian Federation which in practice may be applied for the bringing of charges against the Belovs.

From the standpoint of contemporary Russian legislation, the actions of Olga and Nikita Belov contain the following indicators pointing to their commission of acts criminally punishable in Russia:

- publicly and sharply speaks out against the war;
- participates in anti-war actions;
- assists Ukrainian organisations;
- collects funds for the needs of the Armed Forces of Ukraine;
- transfers his/her own funds for the needs of the Armed Forces of Ukraine,

Thus, in the event of their return to Russia, Olga and Nikita Belov may be charged under the following articles of the Criminal Code of the Russian Federation:

1. Financing of activities directed against the security of the Russian Federation — Article 275.1 of the Criminal Code of the Russian Federation

This article is used if the investigation does not wish to, or cannot, prove a full-fledged «state treason», but considers that there was financial support for activities against the security of the state.

2. Assistance to terrorist activity — Article 205.1 of the Criminal Code of the Russian Federation

The bringing of such a charge is possible if the organisation which received the assistance has been recognised as terrorist, or if the investigation attempts to link the financing with such activity. For ordinary assistance to Ukrainian humanitarian structures, such a classification does not in itself follow automatically, but the risk depends on the specific recipient of the transfers.

3. Participation in the activity of an undesirable organisation — Article 284.1 of the Criminal Code of the Russian Federation

Such a charge may be brought in the event that it is discovered that Olga and Nikita Belov, in the framework of their anti-war campaign, took part in the activity of a structure recognised in the Russian Federation as «undesirable». At the same time, participation is understood as meaning both the organisation of events and simple participation in them, as well as the collection of funds.

4. Public calls for activity against the security of the Russian Federation — Article 280.4 of the Criminal Code of the Russian Federation

This article may be applied to such statements as: «it is necessary to assist Ukraine with weapons»; calls for sanctions in connection with the war in Ukraine; calls for actions against Russian state structures — that is, practically to all statements which the Belovs made while in Finland.

5. Military articles on «discreditation» and «fakes» — Article 207.3 of the Criminal Code of the Russian Federation and Article 280.3 of the Criminal Code of the Russian Federation.

Charges under these articles may be brought for any anti-war statements. In practice, charges have been brought for the following statements: «Russia is waging an aggressive war»; «the army is committing war crimes», and simply a call for the cessation of the war.

6. Extremist articles — Article 282.2 of the Criminal Code of the Russian Federation — participation in the activity of an extremist organisation; Article 282.3 of the Criminal Code of the Russian Federation — financing of extremist activity.

These articles may be applied if it is proved that at least one of the organisations in whose anti-war actions the Belovs participated, or to which they provided support, has been recognised in Russia as extremist.

However, taking into account all the circumstances of the case of Olga and Nikita Belov, the most probable scenario appears to be that, immediately upon their arrival in Russia, in connection with their having provided material assistance to servicemen of the Armed Forces of Ukraine, a criminal case will be initiated against them on a more serious charge, namely

under Part 1 of Article 275 of the Criminal Code of the Russian Federation — «state treason». The preventive measure for this offence, by virtue of its gravity, is detention in custody. The punishment for this offence is provided as **from 12 to 20 years of deprivation of liberty, or life deprivation of liberty.**

In this connection, it should be taken into account that:

— after the commencement of the full-scale war of Russia against Ukraine, the practice of application of the article on state treason has changed substantially. The norm which previously had been used selectively has begun to be applied on a mass scale and to an ever wider circle of persons not in agreement with the policy of the leadership of Russia. I shall cite characteristic examples similar to the situation of Olga and Nikita Belov: the Sverdlovsk Regional Court sentenced to **12 years of deprivation of liberty** Ksenia Karelina, who was accused of state treason. She was found guilty on the basis that on 24 February 2022 she transferred from her account **\$51.8** to the Razom for Ukraine fund; an even more severe sentence was handed down in June 2024 to a former art teacher from the Lipetsk Region, Danila Klyuka, who made two money transfers, of 100,000 and 20,000 roubles, to the Ukrainian fund «Come Back Alive», which was created for the support of the army of Ukraine. The former teacher was sentenced to **20 years of deprivation of liberty.**

— the toughening of judicial practice in cases of state treason in Russia is characterised by an increase in the number of sentences, a tightening of punishment, and a disproportionate severity of punishment in relation to the consequences which ensued as a result of the actions of those convicted. According to the data of research carried out by independent human-rights organisations, over four years of military actions in Ukraine 1,431 persons have become subjects of cases on state treason and espionage. Over the preceding 27 years of the existence of this Criminal Code — 196 persons. In 2024 the average term of the imposed punishment was 12 years; in 2025 it has grown to 15 years. This indicates a systemic toughening of judicial practice under this article;

— statistics show that cases of state treason are not so much an instrument of protection of national security, as one of the key mechanisms of political control and suppression of dissent in conditions of war.

All these circumstances objectively testify to the fact that the probability of the imprisonment of Olga and Nikita Belov as a result of deportation to Russia is **practically inevitable, and constitutes a real threat to their life and health.**

In addition to this, as is demonstrated by the practice of earlier extraditions of Russian citizens in conditions of war (including from the USA), for Nikita Belov, practically without alternative, there may be forced mobilisation with subsequent dispatch to the front in that very

war against Ukraine against which he protested and which became the reason for his forced emigration from Russia.

I am of the opinion that, taking into account the high degree of probability of the occurrence of all the abovementioned consequences of the extradition of Olga and Nikita Belov to Russia, such extradition would be an action violating in respect of them a whole series of provisions of the ECHR, including Articles 2, 3, 6, 10 and 11.

Attorney at law

A handwritten signature in blue ink, appearing to be 'E.M. Khayretdinov', written in a cursive style.

E.M. Khayretdinov