



**MINISTRY OF CULTURE
AND STRATEGIC COMMUNICATIONS OF UKRAINE
(MSCC)**

19 Ivan Franko Street, Kyiv, 01601, tel. (044) 235-23-78

E-mail: info@mcsc.gov.ua , web-site: <https://mcsc.gov.ua/> code according to the Unified State Register of Enterprises and Organizations of Ukraine 43220275

**To Yaroslav YURCHYSHYN, Member
of Parliament of Ukraine**

e-mail: yurchyshyn-y@rada.gov.ua

Regarding consideration of the appeal

Dear Yaroslav Romanovich!

In accordance with the instructions of the First Deputy Prime Minister of Ukraine – Minister of Digital Transformation of Ukraine Mykhailo FEDOROV dated 14.10.2025 No. 33611/1/1-25 (hereinafter – the instructions) the Ministry of Culture and Strategic Communications of Ukraine, together with the Ministry of Economy, Environment and Agriculture of Ukraine (letter dated 21.10.2025 No. 3242-05/71161-03), the Ministry of Foreign Affairs of Ukraine (letter dated 23.10.2025 No. 51/14-212/4-129230), the Ministry of Internal Affairs of Ukraine (letter dated 20.10.2025 No. 42218/38-2025), the Cyber Police Department of the National Police of Ukraine (letter dated 20.10.2025 No. 73555/01-2025), the State Special Communications Administration (letter dated 21.10.2025 No. 02/05/02-11302/2025), the National Commission for the State Regulation of Electronic Communications, Radio Frequency Spectrum and Postal Services (letter dated 20 October 2025 No. 01-7671/183), the State Committee for Television and Radio Broadcasting of Ukraine (letter dated October 22, 2025, No. 2677/23/03), the Security Service of Ukraine (letter dated 23 October 2025 No. 30/508) and the National Council of Ukraine on Television and Radio Broadcasting (letter dated 22 October 2025 No. 17/5158) Within the limits of our competence, we have processed your request dated October 13, 2025, No. 215Д9/15-2025/236424 No. 2100/03-25 (incoming registration MKSK dated October 15, 2025, No. 2100/03-25) regarding the verification of YouTube channels aimed at children for violations of current Ukrainian legislation and the implementation of appropriate measures to respond to the dissemination of propaganda narratives by the aggressor state through the YouTube channel "Masha and the Bear."

Based on the results of our investigation, we would like to inform you that the Cyber Police Department of the National Police of Ukraine has reported that during a detailed analysis



the information published in the description of the YouTube channel "Masha and the Bear" (<https://www.youtube.com/user/MashaBearUkraine/>), in the "Links" section, data was found that may indicate its affiliation with the aggressor country, namely a link to:

the page vk.com/mashabearukraine, posted on the social network of the aggressor country "VKontakte", prohibited in Ukraine by the decision of the National Security and Defense Council of Ukraine dated 28.04.2017 "On the application of personal special economic and other restrictive measures (sanctions)", enacted by the Decree of the President of Ukraine dated 15.05.2017 No. 133/2017;

the web resource mashabear.ru, which is positioned as the official website, is located on the domain of the Russian Federation (when accessed, it redirects to the domain mashabear.com).

In addition, during the analysis of data from open sources (registers of legal entities and individual entrepreneurs of the Republic of Cyprus and the aggressor country), information was found about possible links with the Russian Federation of individuals and legal entities associated with intellectual property rights to the works

"Masha and the Bear." In particular, it was established that the Cypriot company "Animaccord Ltd" (registration number HE 244451), registered on 31.12.2008 in Limassol (Λεμεσός, Cyprus) at the address: 82 Griva Digeni Street, Stephanie House, Floor 3, Office 302, is a legal entity that acts as the copyright holder and central manager of the Masha and the Bear brand at the international level. According to the official register of companies of the Republic of Cyprus (Department of Registrar of Companies and Intellectual Property), the company's directors include, among others, individuals who are likely to be Russian citizens (<https://efiling.drcor.mcit.gov.cy/DrcorPublic/SearchResults.aspx?name=%25&numb er=244451&searchtype=optStartMatch&index=1&tname=%25&sc=0>).

Animaccord Ltd is the owner of the intellectual property rights to the series of brands "MASHA AND THE BEAR," "MASHA'S SONGS," "MASHA AND THREE BEARS," "TADABOOM!,"

ANIMACCORD, as well as localized versions of MASHA ET MICHKA,

Mascha und der Bär, Anmrd, etc. It should be noted that the trademark Masha and the Bear is also registered in Ukraine (valid trademark certificate No. 209849, <https://iprop-ua.com/tm/unrxwpwj>). During further research, the following valid trademark certificates owned by Animaccord Ltd were found:

certificate for trademark No. No. 155288 (<https://iprop-ua.com/tm/y9fks4na>);

certificate for trademark trademark No. 209849 (<https://iprop-ua.com/tm/unrxwpwj>);

certificate for trademark trademark No. 210052 (<https://iprop-ua.com/tm/ms826ryq>);



trademark certificate No. 175170 (<https://iprop-ua.com/tm/eixzt7ol>);
trademark certificate No. 165910 (<https://iprop-ua.com/tm/6co06pem>).

In Russia, Animaccord Ltd is the founder of Masha and the Bear LLC (TIN/KPP 7717673901/771701001), registered in 2010. 100% of the authorized capital of this company (30 million rubles) belongs to

Animaccord Ltd, headed by Dmitry Gennadievich Loveiko. This company is registered as the owner of the trademarks "MASHA AND THE BEAR," "MASHA AND THE BEAR," as well as derivative names and images of characters from the animated series (<https://www.list-org.com/company/6147605>). In addition, it has been established that the animated television series "Masha and the Bear" was created by the organization Animaccord Studio LLC (TIN/KPP 7717611253 / 771701001), registered in 2008 in Moscow. According to an official extract from the Russian Unified State Register of Legal Entities (EGRUL), the company is headed by Natalia Anatolyevna Grishaeva, and the sole owner (founder) is Marina Vyacheslavovna Kuzmina, who owns 100% of the share capital. Previously, among the authorized persons and managers Sergey Kuzmin and Dmitry Loveyko were involved.

Thus, a complex system of corporate and financial ties was established between the companies Animaccord Ltd (Cyprus), Masha and the Bear (Russia), and Studio Animaccord (Russia), which jointly own the rights to audiovisual works, trademarks, characters, and other intellectual property of the *Masha and the Bear* brand.

Therefore, the YouTube channel Masha and the Bear and related digital resources are likely to belong to structures originating in Russian jurisdiction and maintaining a stable connection with the aggressor country through a system of ownership, management, and intellectual property rights.

Considering the above, the activities of Animaccord Ltd, which conducts its business, including in Ukraine, show signs of a crime under Article 258⁵ of the Criminal Code of Ukraine (hereinafter referred to as the CC of Ukraine), namely, financing of terrorism.

In accordance with Part 2 of Article 216 of the Criminal Procedure Code of Ukraine (hereinafter referred to as the CPC of Ukraine), the pre-trial investigation of a criminal offense under Article 258⁵ of the CC of Ukraine falls within the competence of the investigative bodies of the security services. At the same time, according to Part 1 of Article 216 of the CPC of Ukraine, investigators of the National Police conduct pre-trial investigations of criminal offenses provided for by the law of Ukraine on criminal liability, except for those that fall under the jurisdiction of other pre-trial investigation bodies. Since the investigation of the crime, provided for by Article 258⁵ CC Ukraine, directly



falls under the jurisdiction of the Security Service of Ukraine, and the National Police of Ukraine does not have the authority to conduct a pre-trial investigation.

At the same time, the Security Service of Ukraine noted that the information contained in the deputy's appeal had been taken into account in the operational activities of the SBU and reported that appropriate measures had been taken within the limits of its statutory powers.

The State Special Communications Administration reported that, in accordance with Article 32 of the Law of Ukraine "On Electronic Communications," paragraph 16 of the Procedure for the Creation and Operation of the Operational and Technical Management System for Public Electronic Communications Networks and the National Center for Operational and technical management of electronic communications networks of Ukraine for the purposes of state defense and security in conditions of emergency, state of emergency or martial law, approved by Resolution of the Cabinet of Ministers of Ukraine No. 75 of January 24, 2025, the National Center for Operational and Technical Management of Electronic Communications Networks of Ukraine (hereinafter referred to as the NCU) in conditions of a state of emergency or martial law, in accordance with the decisions of the President of Ukraine, the Cabinet of Ministers of Ukraine, the National Security and Defense Council of Ukraine, the National Bank of Ukraine, issues orders that are binding on providers of electronic communications networks and/or services to restrict access to Internet resources (websites, autonomous systems, IP addresses) in a manner that is technically feasible for providers of electronic communications networks and/or services.

In the event of relevant decisions being taken regarding the activities of the YouTube channel "Masha and the Bear," the NCA will participate in their implementation within the limits of its competence.

The National Commission for the State Regulation of Electronic Communications, Radio Frequency Spectrum, and Postal Services noted that, in accordance with paragraphs 15, ²⁸⁴, and ²⁸⁵ of Part Four of Article 4 of the Law of Ukraine "On the National Commission for the State Regulation of Electronic Communications, Radio Frequency Spectrum and Postal Services," the powers of the regulatory authority include, in particular, exercising state supervision (control) over compliance with legislation in the areas of electronic communications, radio frequency spectrum, and postal services; notifying electronic communications service providers, in accordance with the Law of Ukraine "On Media," of their obligation to restrict access to websites specified in the decision of the National Council of Ukraine on Television and Radio Broadcasting, to apply a response measure in the form of a temporary ban on the distribution of online media or a ban on the distribution of onlinemedia, or in a court decision prohibiting the distribution of online media that has entered into legal force, control over the implementation of restrictions on such access by electronic communications service providers; notification in accordance with the Law of Ukraine "On Media" of providers of electronic communications



services on the obligation to restrict or restore access to websites specified in the decision of the National Council of Ukraine on Television and Radio Broadcasting, on the inclusion or exclusion of services in the List of on-demand audiovisual media services and services of audiovisual service providers of the aggressor state, control over the implementation by electronic communications service providers of restrictions or restoration of such access.

The Ministry of Foreign Affairs of Ukraine, in turn, stated that if the decision to apply the relevant restrictive measures is approved, it is ready to take steps to synchronize such restrictions with Ukraine's international partners.

The National Council of Ukraine on Television and Radio Broadcasting (hereinafter referred to as the National Council) emphasized that analyzing children's content for political propaganda is a difficult task, as such content is created with the psychological characteristics of children in mind, using simplified narratives, metaphors, and emotional images that may conceal propaganda messages. This requires a lengthy and thorough analysis of the content (2018 videos as of October 20, 2025), which is complicated by the National Council's limited resources and the lack of additional details or examples that cause concern.

In the opinion of the regulator, the issue raised in your appeal deserves attention in a broader context. Ukraine needs to improve its regulatory framework to strengthen information and national security by introducing restrictions on the distribution of any content from the aggressor country, in particular music, children's, entertainment, and sports content.

The current Law of Ukraine "On Sanctions" does not contain clear prohibitions on the distribution of content created by sanctioned persons. Most of these persons do not have assets in Ukraine or the EU, and the providers who distribute their content often do not have direct contracts with these persons, which complicates the legal grounds for restrictions.

The animated series "Masha and the Bear," created in Russian by the studio Animaccord, is a typical example of content from the aggressor country that is distributed on video hosting platforms. This not only promotes such content, but also provides economic revenue through tax payments to the budget of the aggressor country, which indirectly finances the war against Ukraine. According to open sources, in 2022-2023, Animaccord studio paid about 3.9 million rubles (equivalent to 1.6 million hryvnia) to the Russian state budget of the aggressor country, link: <https://checko.ru/company/studiya-animakkord-1087746191917>).

Any content from the aggressor country, even without explicit propaganda, is an economic resource that strengthens its ability to wage information and military aggression.



Since the start of the full-scale invasion, Google has stopped monetizing YouTube channels for Russian authors (link: YouTube Channel Monetization Policies – YouTube Help).

However, these restrictions do not apply to users outside Russia, allowing sanctions to be circumvented through foreign jurisdictions. The animated series Masha and the Bear is distributed through official channels in various languages (Russian, English, Spanish, Portuguese, Italian, German, Polish, Ukrainian, Turkish, Arabic, Chinese (Taiwan), Korean, Hebrew, Hindi), reflecting Animaccord's strategy to reach a global audience and optimize profits, as well as to potentially influence international viewers with propaganda.

In May 2024, the European Commission clarified the guidelines for the application of sanctions, according to which the broadcast of content by sanctioned persons is an "economic resource" because it can be used for advertising or generating profits (EU Council Regulations No. 269/2014 and 833/2014). This applies to any content, regardless of how it is distributed. The ban covers the provision of internet services, hosting, or other means that facilitate the activities of sanctioned persons.

It should be noted that the legal basis for the activities of media entities in Ukraine, as well as the principles of state management, regulation, and supervision (control) in this area, are defined by the Law of Ukraine "On Media."

According to subparagraph 38 of part one of Article 1 of the aforementioned Law, the social network YouTube is a platform for shared access to video – a service whose main purpose, separate part, or integral functionality is the distribution to the general public for informational, entertainment, or educational purposes of programs and/or user videos over which the video sharing platform provider does not exercise editorial control (editorial responsibility), if such distribution takes place via electronic communications networks and is organized by such a provider, including through the use of automated means or algorithms, in particular for displaying, tagging, and organizing the playback sequence.

The platform "YouTube" is part of segment "Google" corporation Alphabet Inc., headquartered in Mountain View (USA), and therefore the territorial jurisdiction of Ukrainian national legislation does not extend to the regulation of its activities.

The National Council has been designated as the body currently empowered to communicate with shared access platforms on behalf of our state.

According to Article 90 of the Law of Ukraine "On Media," the National Council negotiates with authorized representatives of providers of shared access platforms to information, on-demand audiovisual media services



that do not fall under the jurisdiction of Ukraine, and signs agreements or memoranda with them and determines the instruments and mechanisms for implementing requirements for providers of video sharing platforms.

In accordance with Part 2 of Article 19 of the Constitution of Ukraine, state authorities and local self-government bodies, as well as their officials, are obliged to act only on the basis, within the limits of the powers, and in the manner provided for by the Constitution and laws of Ukraine.

Part one of Article 1 of the Law of Ukraine "On Sanctions" (hereinafter - the Law) states that in order to protect national interests, national security, sovereignty, and territorial integrity of Ukraine, counter terrorist activities, and prevent violations, restore violated rights, freedoms, and legitimate interests of citizens of Ukraine, society, and the state, special economic and other restrictive measures may be applied.

According to part two of the aforementioned article of the Law, sanctions may be applied by Ukraine in relation to a foreign state, a foreign legal entity, a legal entity controlled by a foreign legal entity or a non-resident individual, foreigners, stateless persons, ships, aircraft, as well as entities engaged in terrorist activities, and sanctions in the form of deprivation of state awards may be applied against any award recipients specified in part four of Article 3 of this Law.

Part one of Article 3 of the Law stipulates that the grounds for applying sanctions are, in particular, actions of a foreign state, foreign legal entity or individual, other entities that create real and/or potential threats to the national interests, national security, sovereignty and territorial integrity of Ukraine, promote terrorist activities and/or violate human and civil rights and freedoms, the interests of society and the state, lead to the occupation of territory, expropriation or restriction of property rights, property losses, creation of obstacles to sustainable economic development, and the full exercise by Ukrainian citizens of their rights and freedoms.

The application of sanctions in accordance with part two of Article 3 of the Law is based on the principles of legality, transparency, objectivity, purposefulness, and effectiveness.

In accordance with part one of Article 5 of the Law, proposals for the application, cancellation, and amendment of sanctions are submitted for consideration by the National Security and Defense Council of Ukraine, the Verkhovna Rada of Ukraine, the President of Ukraine, the Cabinet of Ministers of Ukraine, the National Bank of Ukraine, and the Security Service of Ukraine.

Paragraph 3 of the Procedure for the Preparation of Proposals by the Cabinet of Ministers of Ukraine on the Application, Cancellation, and Amendment of Sanctions, approved by



Resolution of the Cabinet of Ministers of Ukraine No. 888 dated November 30, 2016 (hereinafter referred to as the Procedure) it is stipulated that the preparation and submission of proposals to the Cabinet of Ministers of Ukraine regarding the application, cancellation, and amendment of sanctions shall be carried out in accordance with the law, including taking into account the requirements of the Regulations of the Cabinet of Ministers of Ukraine, approved by Resolution of the Cabinet of Ministers of Ukraine No. 950 dated July 18, 2007, *by state bodies whose powers include ensuring the formation and implementation of state policy in the area in which the grounds for the application of sectoral and personal sanctions have arisen.*

Paragraph 4 of the Procedure stipulates that the draft decision of the Cabinet of Ministers of Ukraine on the approval and submission to the National Security and Defense Council of Ukraine of proposals on the application, cancellation, and amendment of sanctions must contain, in particular, a description of the actions and facts confirming the existence of grounds for the application of sanctions specified in Article 3 of the Law.

According to Article 1 of the Law of Ukraine "On Combating Terrorism," terrorist activity is activity that includes, in particular, the promotion and dissemination of the ideology of terrorism; propaganda of the Russian Nazi totalitarian regime, armed aggression of the Russian Federation as a terrorist state against Ukraine, as well as financing and other facilitation of terrorism.

According to a letter from the Cyber Police Department of the National Police of Ukraine (dated October 20, 2025, No. 73555/01-2025), there is a statement of facts confirming the financing of terrorism. Therefore, taking into account that, according to part two of Article 1 of the Law of Ukraine "On the National Police," the activities of the police are directed and coordinated by the Cabinet of Ministers of Ukraine through the Minister of Internal Affairs of Ukraine in accordance with the law, and subparagraph 2¹ of paragraph 4 of the Regulations on the Ministry of Internal Affairs of Ukraine, approved by Resolution of the Cabinet of Ministers of Ukraine No. 878 of October 28, 2015, according to which the Ministry of Internal Affairs, in accordance with its assigned tasks, prepares and submits to the Cabinet of Ministers of Ukraine proposals on the application, cancellation, and amendment of special economic and other restrictive measures (sanctions) submitted by the Cabinet of Ministers of Ukraine for consideration by the National Security and Defense Council of Ukraine in accordance with the Law of Ukraine "On Sanctions," and participates in the formation, implementation, and monitoring of the effectiveness of the state sanctions policy on issues within its competence, the ICC will join in the development of the relevant draft act in accordance with the established procedure.

Taking into account the above, the positions of state authorities, and the absence of direct evidence of propaganda of the Russian Nazi totalitarian regime, armed aggression of the Russian Federation as a terrorist state against Ukraine, the ICC considers it possible and expedient to apply, on the grounds of financing terrorism, in accordance with the established procedure, personal special



economic and other restrictive measures (sanctions) against entities associated with the YouTube channel "Masha and the Bear" on the grounds of financing terrorism, in accordance with established procedure, which could form the basis for joint efforts with European partners in combating the spread of Russian content that finances the war in Ukraine.

The introduction of sanctions against individuals who, without being direct propagandists, pay taxes to the budget of the aggressor country by distributing content in Ukraine or the EU is a promising direction for reducing threats to national security.

Sincerely

First Deputy Minister

Galina GRIGORENKO



SED ASKOD Ministry of Culture and Strategic Communications of Ukraine
No. 07/111/121-25 dated 29.10.2025

Signatory Galina Volodymyrivna Grygorenko Date of
signing: 29.10.2025
Valid from 14.04.2025 0:00:00 to 13.04.2027 23:59:59