



The Russian Federation's Crime in The Bombing of Mariupol Theatre

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Abstract

This journal discusses the crimes that have been committed by The Russian Federation in their conflict with Ukraine, specifically the bombing of the Mariupol theatre during the siege of Mariupol and the violations of human, especially civilian rights in the process. The Mariupol Theatre was a national heritage preserving the culture and history of Ukraine and was utilized as a shelter for civilians from shelling, airstrikes, and bombings during the invasion. It was sheltering a large number of Civilians when the Russian Armed Forces decided to deliberately bomb the site, killing countless of innocent civilians sheltering from the attacks. Ukraine accused the Russian forces for deliberate attacks on civilians in the bombing of the theatre, but Russia denied all the claims in front of the international community. Russia initially claimed that the theatre was used by the Ukrainian military as a base and shelter, so they bombed the theatre purely under military necessity. The Russian claims have since been refuted by multiple independent investigations looking into the case. This attack and acts of aggression can be constituted as a war crime by the Organization for Security and Co-operation in Europe and Amnesty International, and have several times breached the authority of The Geneva Conventions. Russia have yet answered and been charged to these war crimes and allegations since the culprit and main perpetrator, in this case president of Russia Vladimir Putin, has to be brought forth in front of The International Criminal Court (ICC).

Keywords: Crime, Civilian, Russia, Ukraine

I. INTRODUCTION

A. Background

In this modern era, states and countries have all become modern states or are working towards achieving that status. Some of them are newly born states from many different forms of governments and state. One of the most



prominent but no longer existing state is the Soviet Union or officially the Union of Soviet Socialist Republic (USSR) formed in 1922 and ended in 1991.¹ The union itself was a massive power comprised of many states on the Eurasian area, such as Ukraine, Georgia, Belarus, Armenia, Azerbaijan, Kazakhstan, Kyrgyzstan, Moldova, Turkmenistan, Tajikistan, Uzbekistan, Latvia, Lithuania, Estonia, and ultimately Russia as we know it today.² After the downfall of the Soviet Union, these countries started to form and gain sovereignty for themselves while being recognized as a sovereign state by the international community. One of this newly born state is Ukraine, geographically located in Eastern Europe next to Russia or officially the Russian Federation. Russia was the powerhouse of the Soviet Union where most of the governmental and political powers are centered. It is also the biggest country in the world by land mass, with its capital in Moscow on the far west of the country, where the Kremlin, the powerhouse of the Russian government and formerly the Soviet Union, is located.

Russia shares a land border with some of the former Soviet Union states, such as the Baltic States (Latvia, Lithuania, and Estonia), Belarus in the east, Kazakhstan and Georgia on the south, and ultimately Ukraine in the southwest of the country. Russia President Vladimir Putin have many times stated in the past that the Russian Federation under his leadership plans to restore the former glory of the Soviet Union and projected to unite the former member states into one strong union to fight off the ever-growing power of the West, mainly The North Atlantic Treaty Organization (NATO).³ Across their shared history, Russia and Ukraine have had many legally questionable encounters in

¹ Anonymous, "Collapse of the Soviet Union", HISTORY, <https://www.history.com/topics/cold-war/fall-of-soviet-union>, 19 April 2022

² Christopher Klein, "What Countries Were Part of the Soviet Union?", HISTORY, <https://www.history.com/news/what-countries-were-in-soviet-union>, 8 March 2022

³ Tsira Shvangiradze, "Vladimir Putin's Russia: Trying to Rebuild the Soviet Era?", The Collector, <https://www.thecollector.com/vladimir-putin-russia-rebuilding-the-soviet-era/>, 28 April 2022



the past.⁴ One of the main reasons is simply because Ukraine is one of the closest neighbors of Russia with many benefits for Russia if they manage to overtake the state. The most recent case was the all-out invasion towards Ukraine after months of preparation from Russia while gathering military personnel across every shared border with Ukraine.⁵ Ukraine has been waiting for the approval of their application to join the European Union (EU) but has since faced more scrutiny from their eastern neighbour. If Ukraine and the rest of the former Soviet states who are slowly progressing western towards the EU all decide to join the massive power of the West, Russia would be left isolated and left behind in many aspects. This is one of the main reasons why Russia is advancing towards their neighbouring former Soviet states in order to reclaim the power and to ensure that the power they hold will remain and grow stronger.

On 24 February 2022, Russia launched the first attack on Ukraine under the reason of self-defense.⁶ Russia claimed that the attack was influenced by Ukraine's actions and aggressions towards their bordering area, and they reacted solely on the purpose of self-defense. Shortly after, the area of Donetsk and Luhansk in the Russia-controlled Donbas region got overtaken by the Russian-backed separatists. They proclaimed themselves as an independent region and named themselves The Donetsk People's Republic and the Luhansk People's Republic respectively. Russia was the first state to internationally recognize these two puppet states in order to increase the

⁴ Matthew Mpoke Bigg, "A history of the tensions between Ukraine and Russia.", The New York Times, <https://www.nytimes.com/2022/03/26/world/europe/ukraine-russia-tensions-timeline.html>, 26 March 2022

⁵ Anonymous, "Russian forces launch full-scale invasion of Ukraine", Al Jazeera, <https://www.aljazeera.com/news/2022/2/24/putin-orders-military-operations-in-eastern-ukraine-as-un-meets>, 24 February 2022

⁶ Jeffrey Edmonds, "Putin describes the attack on Ukraine as an act of self-defense", NPR, <https://www.npr.org/2022/02/24/1082736117/putin-describes-the-attack-on-ukraine-as-an-act-of-self-defense>, 24 February 2022



pressure on their aggression towards Ukraine.⁷ This attack by Russia can be considered as an act of aggression according to the UN General Assembly which includes “the invasion or attack by the armed forces of a State of the territory of another State.”⁸ In military terms, an invasion can be defined as the movement of military units into an area belonging to another state.⁹ An invasion has certain objectives that the perpetrator country are trying to achieve, such as conquering; liberating or re-establishing control or authority over a territory; forcing the partition of a country; altering the established government or gaining concessions from said government; or a combination thereof.

The Russian attack on Ukraine went on for months and Russia threatens to demolish other countries if any other sovereign state decides to step in and assist Ukraine in its effort against Russia. On 16 March 2022, the Russian Armed Forces attacked the Donetsk Academic Regional Drama Theatre in Mariupol, Ukraine using bombs and airstrikes.¹⁰ This theater was a cultural heritage site and was used as a shelter for civilians from air raids and strikes during the siege of Mariupol. It was sheltering a large number of Civilians when the Russian Armed Forces decided to deliberately bomb the site, killing countless of innocent civilians sheltering from the attacks. Ukraine accused the Russian forces for deliberate attacks on civilians in the bombing of the theater, but Russia denied all the claims in front of the international community. Russia initially claimed that the theater was used by the

⁷ Anonymous, “Ukraine: Putin announces Donetsk and Luhansk recognition”, BBC, <https://www.bbc.com/news/av/world-europe-60470900>, 21 February 2022

⁸ United Nations General Assembly, Resolution 3314 (XXIX), 14 December 1974, Annex, Art. 3(a).

⁹ Michael Bothe, “Effective control during invasion: a practical view on the application threshold of the law of occupation”, *International Review of the Red Cross*, Volume 94 Number 885 Spring 2012.

¹⁰ Andrew Carey, Olga Voitovych, Celine Alkhaldi, “300 people were killed in Russian airstrike on Mariupol theater, Ukrainian authorities say”, CNN, <https://edition.cnn.com/2022/03/25/europe/ukraine-mariupol-theater-dead-intl/index.html>, 25 March 2022



Ukrainian military as a base and shelter, so they bombed the theater purely under military necessity. Russia then later denied these allegations and accused the blowing up of the building on the Azov Battalion, a unit of the National Guard of Ukraine.¹¹ Both of these Russian claims have since been refuted by multiple independent investigations looking into the case.

This attack and acts of aggression can be constituted as a war crime by the Organization for Security and Co-operation in Europe and Amnesty International, and have several times breached the authority of The Geneva Conventions. Russia have yet answered and been charged to these war crimes and allegations since the culprit and main perpetrator, in this case president of Russia Vladimir Putin, has to be brought forth in front of The International Court of Justice (ICJ), or frequently known as the World Court. In order to bring forward this case to the ICJ, Putin has to be taken out of his sovereign governing state and brought to face the authority of the ICJ. The rest of the world have since then taken some actions towards Russia for the hostility and aggression they have been continuously doing to Ukraine. These actions can be seen in multiple forms such as economic isolation, embargoes, and media cut-offs.¹²

B. Issue

According to the aforementioned background, the issue that can be formulated and analyzed in this thesis is the following:

1. Does Russia's actions towards Ukraine constitute a crime if we refer to the Geneva Conventions?

¹¹ Anonymous, "Russia-Ukraine war: Mariupol theatre sheltering 'hundreds' bombed", Al Jazeera, <https://www.aljazeera.com/news/2022/3/16/war-rages-despite-glimmer-of-hope-in-russia-ukraine-talks>, 17 March 2022

¹² Anonymous, "What are the sanctions on Russia and are they hurting its economy?", BBC, <https://www.bbc.com/news/world-europe-60125659>, 1 October 2022

C. Metode Penelitian

Legal research is the process of discovering legal rules, legal principles, and legal doctrines in order to resolve legal issues.¹³⁾ Legal research is generally the process of finding an answer to a legal question or checking for legal precedent that can be cited in a brief or at trial. Sometimes, legal research can help determine whether a legal issue is a "case of first impression" that is unregulated or lacks legal precedent. Virtually every lawsuit, appeal, criminal case, and legal process in general requires some amount of legal research.¹⁴⁾

The structure of a thesis is essential for the readers to understand the arguments presented. As a result, it is crucial to follow a clear organizational format that will be intelligible to the readers. Most legal writing requires the writer to analyze a set of facts using legal rules gleaned from a myriad of sources, including cases, statutes, and secondary materials. Legal writing has its own specific structure that practitioners and academics use in one form or another.¹⁵⁾

1. Type of Research

The used method in this study is a normative research method, which is carried out by examining literature materials. Research sources are required to solve legal issues while also prescribing what should be.¹⁶⁾ "In normative law research there are several approaches, including:¹⁷⁾

- a. statute approach;

¹³⁾ Peter Mahmud Marzuki, *Penelitian Hukum*, Cetakan ke-1, (Jakarta: Kencana Premuda Media Group, 2006), P.35.

¹⁴⁾ Philip Langbroek, "Methodology of Legal Research: Challenges and Opportunities", *Utrecht Law Review*, 8 December 2017, P.2.

¹⁵⁾ Jason Ueda, "Organizing a Legal Discussion", *Columbia Law School Writing Center*, <https://www.law.columbia.edu/sites/default/files/microsites/writing-center/files/organizing_a_legal_discussion.pdf>, P.1.

¹⁶⁾ *Ibid*, P.93.

¹⁷⁾ *Ibid*.



- b. case approach;
- c. historical approach;
- d. comparative approach;
- e. conceptual approach.”

In this case the author will use the statutory approach. The statutory approach is typically carried out by thoroughly reviewing all laws and regulations pertaining to the legal issues under consideration.¹⁸⁾

2. Nature of Research

This research follows the nature of prescriptive in the study. The research prescribes the essence of legal research and how it should be, because that is the main objective to conduct a research.¹⁹⁾

3. Type of Data

The sources of data in doctrinal legal research are namely substantive legal rules, doctrines, or concepts and judicial decisions thereon.²⁰⁾ To gather the required data for this research, the writer has conducted library research to gather the required legal materials. These legal materials are obtained from:

a. Primary Legal Materials

Primary legal materials are legal materials with authority that has a binding power.²¹⁾ Primary legal materials mainly consist of statutory regulations, treaties and precedents.²²⁾ Primary legal materials used by the author in this thesis include: The Geneva Conventions.

b. Secondary Legal Materials

Secondary legal material is a legal material that can be used to support primary legal materials. The main secondary legal materials are literatures which

¹⁸⁾ *Ibid.*

¹⁹⁾ *Ibid*, P. 36

²⁰⁾ Amrit Kharel, “Doctrinal Legal Research”, Paper, P.10.

²¹³¹⁾ *Ibid*, P.181.

²²⁾ *Ibid*, P.141.

include legal journals, theses, and dissertations²³⁾, also articles. Additionally, we can also use comments on court decisions and legal dictionaries to be included in secondary legal material.²⁴⁾ This research uses secondary legal material such as materials from the literature, books, journals, theses, and dissertations.

c. Non-Legal Materials

Non-legal materials supplement primary and secondary legal materials by providing additional guidance. In order to obtain factual and legal opinions about the object under study, the author used non-legal materials such as encyclopedias, the Indonesian Dictionary (KBBI), and interviews with informants and sources.

4. Collection of Data and Processing Technique

Based on the research method used, “the data collection technique used is the study of documents or literature study” conducted through the collection of secondary legal materials. In addition, if necessary, data collection techniques can be done through interviews with relevant parties.

After the data and legal materials are collected, in normative legal research, data processing is carried out in such a way as to systematize written legal materials. In this case the processing of materials is carried out by means of selecting secondary legal materials, then classifying according to the classification of legal materials and compiling the legal material of the research results systematically, of course this is done logically, meaning that there is a relationship and the relationship between legal material one with other legal materials to get a general picture of the results of research.²⁵⁾

5. Data Analysis Techniques

²³⁾ *Ibid.*

²⁴⁾ *Ibid*, P.155.

²⁵⁾ Mukti Fajar ND dan Yulianto Achmad, *Dualisme Penelitian Hukum Normatif dan Empiris*, (Yogyakarta: Pustaka Pelajar, 2010), P.181.



This study uses the study of legal material by means of deductive logic. Peter Mahmud Marzuki, citing Philipus M. Hadjon's opinion, explained the deduction method as Aristotle's syllogism. The application of the deduction method results from the submission of a major premise. Then a minor premise is presented, and a conclusion is drawn from the two premises.²⁶⁾

II. ANALYSIS

A. How The Rule of Law Applies to Every State and The Actions Taken

According to the rule of law, every individual holds the same regard and responsibility to the same laws, all citizens and institutions alike within a community, country, or state. These subjects include lawmakers and leaders indiscriminately.²⁷²⁸ One of the most well-known and fundamental rules in international law is the territorial integrity of a sovereign's state. This foundation has been laid in both treaties and international customs across history. Article 2 of the UN Charter mandates member states to refrain "from the threat or use of force against the territorial integrity of political independence of any state..."

The Geneva Conventions are another set of laws that have received increased scrutiny as a result of the Russian invasion but are rarely fully understood. "If we refer to the Geneva Conventions, it is very difficult to determine a war crime, but the evidence and reports emerging from the investigation in Ukraine strongly shows that there have been multiple violations of the Conventions and other customary international human rights law by Russia. The attacks in Mariupol against civilian facilities like schools and hospitals, also indiscriminate shelling of non-military targets have proved

²⁶⁾ *Ibid*, P. 89.

²⁷ Tyson Brown, "Rule of Law", National Geographic, <https://education.nationalgeographic.org/resource/rule-law>, 20 May 2022

²⁸ Anonymous, "Geneva: Rule of Law & the SDGs", IDLO, <https://www.idlo.int/news/highlights/geneva-rule-law-sdgs>



to be a war crime under the Geneva Conventions. The International Red Cross have also faced preventions and denied entry by Russian forces from bringing the critically needed humanitarian supplies to the city. This would also constitute as war crimes if we refer to the Geneva Conventions.

B. The Principle of Proportionality as the Baseline of Every Aggression

If we refer to the principle of proportionality, if the downside and harm left by the result of an attack, the attack must not be done in the first place. Even if there are clear military targets, it shouldn't be done if the estimated harm to civilians and civilian property.²⁹ The ends don't justify the means if the downside of the efforts causes more harm than good. This is one of the most difficult rules of international humanitarian law (IHL) to apply because it necessitates a delicate balance between two factors that have little to do with each other.³⁰

The proportionality principle states that decision-makers must weigh the severity of the interference against the intensity of the social need for action when considering an interference with a Convention right. Essentially, they are bound to decide whether a person's rights should be violated. This is intended to shield individuals from arbitrary decisions.

Although deliberately targeting civilians in a conflict zone would constitute a war crime, incidentally killing civilians does not. The principle of proportionality also affects war crimes considerations. The force used by the military must be proportional so as to ensure that the civilian death toll is not excessive in relation to the anticipated military advantage. Despite the massive amounts of documentation by reporters, non-governmental organizations, and state organizations, proving disproportionality could be difficult in court.

²⁹ Anonymous, "Proportionality", ICRC, <https://casebook.icrc.org/glossary/proportionality>

³⁰ Anonymous, "The Principle of Proportionality", Diakonia, <https://www.diakonia.se/ihl/resources/international-humanitarian-law/ihl-principle-proportionality/>



C. How Russia Should Be Prosecuted

For the Russian's actions to be considered as a war crime, there has to be several steps and questions which need to be answered first. The history between Russia and Ukraine stretches far and wide, but in this case, we have to look first whether the instigation and escalations were actually done by any of the states.

There are some main reasons of why Russia would attack Ukraine. The first one would be their shared history as a fellow former member of the Soviet Union. After the dissolving of the Soviet Union, many of the former states were not yet able to survive and operate independently as sovereign states. It was then decided to form an alliance called the Commonwealth of Independent States (CIS), with Russia as its powerhouse and Ukraine as one of the prominent founding states.

After years of alliance and working together, a massive number of Russian fleets and armadas were stationed at the Ukrainian borders to safeguard against the western attacks. But after periods of time, these would cost Ukraine a lot without much of benefits in return. Russia claimed that they did not need to pay anything to Ukraine since they are part of the same commonwealth. The people started to get agitated by these decisions and started to rally against Russia and their pro-Russian leader. After the succession of government, the former Ukrainian president who was a pro-Russian leader was replaced by the current president Volodymyr Zelenskyy who is pro-western. This was the people's vote for freedom from the grasp of Russian. But the Ukrainian military was still pro-Russian, and this would lead to rebellions by militias inside of Ukraine itself.

This leads to the other reason why Russia would want to keep Ukraine in their grasp. Zelenskyy is a pro-western leader and he has persevered to join the NATO and EU. NATO would welcome Ukraine's application with open arms



since Ukraine is one of the closest borders to Ukraine and one of the main entries towards Russia. This would mean a weak point in Russia's defense and in turns would also leave them isolated and cornered in terms of international power and influence.

First, we have to look into the culprits of the actions. If the actions were taken by states and their respective military units, then we can conclude that this is an international problem and we should follow the First Protocol of the Geneva Conventions which deals with international armed conflicts. But if the actions were instigated by non-military combatants, such as militias and rebel forces, we have to refer to the Second Protocol of the Geneva Conventions which deals with non-international armed conflicts.

As far as facts and evidences go, this conflict is a conflict between two states, Russia and Ukraine, and their respective military forces. This means that the actions taken were under the commands of their highest commanders. But we still need to look deeper into the chain of commands and where the orders were actually from. Whichever actions taken and crimes that followed will be judged for the countries accountable, and the highest commanders who gave the orders will be the ones will be charged and held accountable for the offenses done during the conflict.

After we are able to conclude who the parties are in this conflict, then we will have to look into the actions taken and the reasons why. It is formally known that Vladimir Putin, the president and head of government of The Russian Federation, have stated that Ukraine is part of Russia, which undermines the sovereignty of Ukraine as a sovereign independent state. This in itself is already unjustifiable since Ukraine is recognized internationally. Since one of the most prominent ethnics in Ukraine is also Russian, Russia also believe that they have the right to defend their kin from the domination of the Ukrainian. They can also use the principle of pre-emptive strike in Article 51 of the UN Charter as a reason



to self-defend before they get attacked themselves by the western if Ukraine sides with them.

The international community has taken actions to aid Ukraine in this conflict, and the United Nations Security Council (UNSC) has taken some measures to help solve this conflict. But since Russia itself is a massive powerhouse, not much of these actions and decisions have affected Russia and their operations. If there are any harsh decisions that would give major setbacks to Russia, Russia can veto the decision as a permanent member of the UNSC.

In the end, the outcome of this conflict resides under the victor. Whoever wins the conflict will get away with what they've caused and the losing party will have to bear the consequences of the conflict and the actions they've taken during. The subjects of the losing party will be brought upon the International Criminal Court (ICC) as the perpetrator of the conflict.

This will then decide which of their actions constitute as an offense to international laws and treaties, and whether these actions can be considered as war crimes, crimes against humanity, crime of aggression, and/or genocide. The ICC have the authority to take decisions upon these matters and held accountability over the sanctions that will be given upon the perpetrators of the conflict.

III. CLOSING

A. Conclusion

The acts of aggression taken by The Russian Federation towards Ukraine cannot be justified under any circumstances. Although they claimed that it was under military necessity and as an act of self-defense, the proportionality of the damage caused by their actions are far too one-sided to be called proportional in the first place. These actions and violations of human rights against the civilian victims in the attack constitute war crimes according to international laws, but



the sanction and prevalence of justice is hardly possible since the main perpetrator cannot be charged and brought forward to international court. Regardless of their status and position in the world order and the ruling council, these crimes should not go unpunished.

B. Recommendation

The world and international community should stand together against international crimes during conflict times. The sanctions against Russia have not been efficient relatively since Russia is already a massive powerhouse itself. Armed conflict and violence should be avoided in any case if we are to achieve world peace. The United Nations Security Council, in which Russia is a permanent member of, should send enforcements to end the conflict and bring forth the international criminals to be prosecuted in the International Criminal Court. The ICC should also provide restitutions for the victims of this conflict and the damage dealt towards the welfare of the country.

IV. DAFTAR PUSTAKA

A. Buku

Clark, Mary T. *A Chapter in Augustine and Social Justice*. Lexington Books, 2015.

Shaw, Malcolm N. *International Law*. Cambridge, 2008.

Wilson, Heather A. *International Law and the Use of Force by National Liberation Movements*. New York: Oxford University Press, 1988.

Moore. *History and Digest*. Vol. III. (1871).

Petrova, Dimitrina. *The Declaration of Principles on Equality: A Contribution to International Human Rights*. The Equal rights Trust. April 2008.

Geneva. *Convention on the Protection of Civilian Persons in Time of War* (1949).

Geneva. *Convention on the Treatment of Prisoners of War* (1949).



United Nations. Charters of the United Nations. (1945).

United Nations. Resolution 3314 (XXIX). General Assembly. Annex, Art. 3(a). (1974).

B. Book Chapter

Wood, Michael. *The International Law Commission 1999-2000, Vol IV: Treaties, Final Draft Articles, and Other Materials*. (Oxford University Press: 2010).

Brownlie, Ian. *System of the Law of Nations: State Responsibility*. Part I. (Oxford, Clarendon Press: 1983).

C. Artikel Jurnal Cetak

Carbone, Sergio M, and Schiano di Pepe. "States, Fundamental Rights and Duties". Max Planck Encyclopedia of PIL. January 2009.

Bothe, Michael. "Effective control during invasion: a practical view on the application threshold of the law of occupation". International Review of the Red Cross. Volume 94 Number 885 Spring 2012.

Wilson, Heather A. *International Law and the Use of Force by National Liberation Movements*. (New York, Oxford University Press: 1988).

Wood, Michael. *The International Law Commission 1999-2000, Vol IV: Treaties, Final Draft Articles, and Other Materials*. (Oxford University Press: 2010).

ILC. *Commentaries to Draft Articles on Responsibility of States for Internationally Wrongful Acts*. (2001).

D. Artikel Jurnal Online

Tyson Brown. "Rule of Law". National Geographic. <https://education.nationalgeographic.org/resource/rule-law>. 20 May 2022.

Zewei, Yang. "The Legal Effect of the Principle of Sovereign Equality of States". Law and Business Research, No. 1. 2003.

Pellet, Alain. "The Charter of the United Nations: A Commentary of Bruno Simma's Commentary". *Michigan Journal of International Law*. Vol. 25 Issue 1. 2003.



Anonymous. "Geneva: Rule of Law & the SDGs". IDLO.
<https://www.idlo.int/news/highlights/geneva-rule-law-sdgs>

E. Kutipan Makalah/Paper/Orasi Ilmiah

Bothe, Michael. "Effective control during invasion: a practical view on the application threshold of the law of occupation". International Review of the Red Cross. Volume 94 Number 885 Spring 2012.

F. Website

Anonymous. "Collapse of the Soviet Union". HISTORY.
<https://www.history.com/topics/cold-war/fall-of-soviet-union>. 19 April 2022.

Klein, Christopher. "What Countries Were Part of the Soviet Union?". HISTORY.
<https://www.history.com/news/what-countries-were-in-soviet-union>. 8 March 2022.

Shvangiradze, Tsira. "Vladimir Putin's Russia: Trying to Rebuild the Soviet Era?". The Collector.
<https://www.thecollector.com/vladimir-putin-russia-rebuilding-the-soviet-era/>. 28 April 2022.

Bigg, Matthew Mpoke. "A history of the tensions between Ukraine and Russia.". The New York Times.
<https://www.nytimes.com/2022/03/26/world/europe/ukraine-russia-tensions-timeline.html>. 26 March 2022.

Anonymous. "Russian forces launch full-scale invasion of Ukraine". Al Jazeera.
<https://www.aljazeera.com/news/2022/2/24/putin-orders-military-operations-in-eastern-ukraine-as-un-meets>. 24 February 2022.

Edmonds, Jeffrey. "Putin describes the attack on Ukraine as an act of self-defense". NPR.
<https://www.npr.org/2022/02/24/1082736117/putin-describes-the-attack-on-ukraine-as-an-act-of-self-defense>. 24 February 2022.

Anonymous. "Ukraine: Putin announces Donetsk and Luhansk recognition". BBC.
<https://www.bbc.com/news/av/world-europe-60470900>. 21 February 2022.



Carey, Andrew, Olga Voitovych, and Celine Alkhaldi. "300 people were killed in Russian airstrike on Mariupol theater, Ukrainian authorities say". CNN. <https://edition.cnn.com/2022/03/25/europe/ukraine-mariupol-theater-dead-intl/index.html>. 25 March 2022.

Anonymous. "Russia-Ukraine war: Mariupol theatre sheltering 'hundreds' bombed". Al Jazeera. <https://www.aljazeera.com/news/2022/3/16/war-rages-despite-glimmer-of-hope-in-russia-ukraine-talks>. 17 March 2022.

Anonymous. "What are the sanctions on Russia and are they hurting its economy?". BBC. <https://www.bbc.com/news/world-europe-60125659>. 1 October 2022.

Anonymous. "Proportionality". ICRC. <https://casebook.icrc.org/glossary/proportionality>.

Anonymous. "The Principle of Proportionality". Diakonia. <https://www.diakonia.se/ihl/resources/international-humanitarian-law/ihl-principle-proportionality/>.