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Alexander Kizlyar, 100 BTC with no address and a Maybach worth 1.5 million. What the NACP audit revealed

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The NACP identified discrepancies totalling 8.67 million UAH in Alexander Kizlyar Jr’s declaration. We examine the entries regarding 100 BTC, the two different values of the Maybach and the legal dispute.



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Editorial photomontage based on a portrait of Alexander Kizlyar provided. The figures are illustrative. 70 and 30 BTC are stated in the public declaration.

Alexander Kizlyar Jr's declaration lists 100 BTC and 1,000 ETH in his and his spouse's names. Instead of public addresses, the register lists the name of the Trust Wallet app. The NACP examined these entries, took into account the MP's explanation regarding security, and noted that it had not received any supporting documents regarding the dates of acquisition. As for other sections of the same declaration, the agency identified discrepancies totalling 8,669,826.67 UAH. [1] [2]

In April 2024, 'ANTICOR' raised the question of whether it was possible to verify the cryptocurrency declared by a member of the Khmelnytskyi District Council. Now there are documents that allow us to go much further. The NACP's report contains Kizlyar's own response, a list of omitted shareholdings in companies, and two different prices for a single Maybach. The court ruling concerns a dispute over the evidence on which the agency based its investigation. And in the declarations submitted as early as spring 2026, the address field still reads 'Trust Wallet'. [3] [1] [4] [2] [5]

> **Alexander Kizlyar — the Kartel-Khimprom dossier**
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> The factsheet compiles information from the editorial team's source regarding the alleged co-ownership of a network of call centres. It states that the documents relating to ownership shares were not verified separately. Below, we analyse the documents concerning the declarations and the legal dispute.

100 BTC. What exactly is recorded in the register

Alexander Kizlyar and his father share the same first name, patronymic and surname. This article is about Kizlyar Jr, a Member of Parliament **Khmelnytskyi District Council**In his 2025 declaration, 70 BTC are listed under the MP's name, with a further 30 BTC listed under his wife's name. The stated date of acquisition is the same for both entries: 1 January 2012. The entry in the 'public address' field also matches: Trust Wallet. [3] [2]

The same pattern is evident in the 2020 declaration as well. In the reports for 2023 and 2024, in the amended declaration for 2024 dated 10 April 2026, and in the annual declaration for 2025, the amounts and dates relating to BTC and ETH are repeated. These are consistent entries that can be

traced via the register. Their repetition year on year leaves open the question of what documents were used to substantiate the original transactions. [6] [7] [8] [4] [2]

Assets	Kizlyar	His wife	Date on the declaration
Bitcoin	70 BTC	30 BTC	01.01.2012
Ethereum	600 ETH	400 ETH	01.01.2015
Pepe	6.5 billion units	—	20.06.2023
Sol	1,500 units	—	01.10.2023

The source of the table is the section on intangible assets in the 2025 declaration. For all the items listed, ‘Trust Wallet’ is indicated in the public register instead of an address. [2]

‘OpenDataBot’ valued the 100 BTC at **278.8 million UAH** As at 10 June 2026. Analysts also identified a further 74 million UAH worth of 1,000 ETH. These figures are calculated at the exchange rate on a specific date. The declaration lists a different value for the 100 BTC: 3,356 UAH for Kizlyar and 1,438 UAH for his wife, totalling **4,794 UAH**. A comparison highlights the scale of the reported price increase. To claim income from the sale of cryptocurrency, a separate, verified transaction would be required. [9] [2]

Wallet name instead of an address

The NACP form for cryptocurrency has separate fields for the public address and the service provider. The public address helps to match the entry with blockchain data. Trust Wallet is the name of the app. It is not possible to determine a specific address or find the corresponding transactions based on the name alone. To verify ownership, documents are also required that link the relevant address or account to the declarant. [10] [1]

Trust Wallet dates its foundation to 2017. Therefore, the mention of this name alongside the date 2012 requires explanation. Older coins may have been transferred to a newer wallet. The company itself describes the import of existing wallets. The ‘provider’ field may indicate where the coins were held at the time of the report, whilst the first transfer may relate to a completely different service. It is impossible to reconstruct this sequence based on the published form. [11] [12] [2]

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Another question arises regarding Ethereum. Both entries for ETH are dated 1 January 2015. The Ethereum mainnet only went live on 30 July. The ETH presale, however, took place back in 2014. A possible scenario involving an early purchase needs to be verified against the pre-sale records, the payment date and documents confirming receipt of the coins after the network launched. The public declaration does not contain this explanation. [2] [13] [14]

What Kizlyar told the NACP

Paragraphs 7.2 and 7.3 of reference No. 207/26 set out the MP's explanations. He cited security concerns and the risk of unauthorised access should his identifiers be disclosed. He also submitted a copy of a letter from the company dated 31 December 2024 showing cryptocurrency balances. The NACP noted that the amounts in the letter matched those in the declaration. However, regarding the dates of acquisition, the agency reached a different conclusion — it was not possible to substantiate them with supporting documents. The NACP considered the name of the platform in the public address field to be an inaccuracy. [1]

This is precisely where the line between fact and conjecture lies. The letter provides the agency with information on balances as at the end of 2024. It does not resolve questions regarding the original dates or specific public identifiers. Nor does the published NACP conclusion imply that the 100 BTC have been declared fictitious. In the final classification of the report, the block of intangible assets is categorised as inaccurate information, whilst the monetary sum **8,669,826.67 UAH** calculated based on other items. [1]

What made up the 8,669,826.67 UAH

The NACP's report allows the figures to be reconciled down to the last kopeck. The largest components were missing corporate shares, two parking spaces and the cost of purchasing a Toyota Land Cruiser. The agency added to these undisclosed account balances and certain sources of income. [1] [15]

The NACP's position as set out in its report	Discrepancy, UAH
Two parking spaces	1 875 000,00
Three shares in companies	3 668 235,00
The declarant's undeclared income under sections 8.1–8.3	5 168,15

The NACP’s position as set out in its report	Discrepancy, UAH
Undeclared balances in the declarant’s accounts	64 731,52
Expenses for a Toyota Land Cruiser	3 056 692,00
Total	**8 669 826,67**

A breakdown of the items included by the NACP in the financial summary of Report No. 207/26. [1]

Parking spaces. According to the audit findings, the couple purchased two adjacent parking spaces. The NACP recorded the contractual amounts as 937,500 UAH each. Kizlyar explained that he had omitted his own parking space by mistake and provided a valuation of 17,650 UAH as at the end of 2024. Regarding his wife’s parking space, he stated that, at the time of submitting the declaration, he was unaware of her ownership of it. The Agency referred to the purchase documents and the simultaneous registration of the deeds. Both items were included in the amended declaration. [1] [15] [4]

Toyota. According to the contract for the Land Cruiser, which the NACP examined, the advance payment amounted to 2,139,685 UAH, whilst 917,007 UAH was paid via a loan. These two parts make up the total sum of 3,056,692 UAH. Kizlyar explained that he had omitted these expenses when completing his declaration and had not intended to conceal them. The NACP included these expenses in the financial findings of its audit. [1]

Fuel companies. This concerns shares in ‘STANDARD-OIL’ worth 1,405,755 UAH, ‘Proskuriv Oil’ worth 548,480 UAH and ‘Ukrstandard Oil’ worth 1,714,000 UAH. According to the information provided, these holdings should have been declared as at the end of 2024. Kizlyar attributed the omission to an error. All three shareholdings appeared in the corrected version. To understand the MP’s role in business, the shareholdings themselves and the dates of ownership are significant, as these can be cross-referenced with the register. [1] [4]

One Maybach and two prices from different documents

In the audited declaration, the price field for the Mercedes-Benz Maybach S580 was left blank. In its report, the NACP stated that, under a commission agreement dated 4 September 2024, the car was purchased for **1.5 million UAH**. In the customs declaration for the same car dated 23 January 2023, the agency found **9,635,122.49 UAH**. The discrepancy exceeds eight million hryvnias. The two figures relate to different dates and documents. The terms of resale and the reasons for this

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discrepancy are not disclosed in the published report. [1]

Kizlyar explained that when he completed the declaration, he did not have a copy of the contract, which is why he made a mistake when filling in the price field. The corrected declaration for 2024 states a contract value of 1.5 million UAH. The same figure is listed on the form for 2025. The NACP classified the entry regarding the car's value as an inaccuracy. The agency did not include the difference between the customs value and the contract value in the final total of 8.67 million UAH. This sum includes the cost of another car — a Toyota Land Cruiser. [1] [4] [2]

What is being contested in court

Report No. 207/26 is dated 20 March 2026. In it, the NACP pointed to signs of false declaration under Part 2 of Article 366-2 of the Criminal Code of Ukraine. In the sections concerning illicit enrichment and unexplained assets, the agency did not identify any such indications. The total amount relates to the content of the declaration. [1] [16]

Kizlyar applied to the Khmelnytskyi District Administrative Court, demanding that the NACP's report and reasoned conclusion of 27 March 2026 be annulled. In case No. 560/11808/26, on 15 September the court requested the documents on which the selection of the declaration for verification was based, including a letter from the State Bureau of Investigations. It follows from the ruling that the agency referred to the letter, whilst the court required the document itself in order to assess the legality of the selection. The published ruling concerns the request for evidence. [17] [5]

The same ruling sets out the NACP's position on pre-trial proceedings No. 62026000000000362 dated 8 April 2026. According to the information the agency provided to the court, the materials were added to proceedings No. 62022000000000619 in May. The published court document details the progress of the investigation; however, the materials used do not contain any confirmation that Kizlyar was served with a notice of suspicion or a verdict in relation to this episode. [5]

Where did the other 38.8 million hryvnias come from?

This figure relates to **Kizlyar Senior**, MP for Khmelnytskyi **city councillor** The NACP audited his 2024 declaration separately. 'Suspilne' reported discrepancies totalling over 38.8 million UAH, including issues regarding cash and sources of income. The City Council terminated his mandate early on 18 June 2026 following his personal request. The son's financial disclosure statement includes his own assets and his own NAZK certificate. [18] [19] [16]

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Three questions that remain following the audit

1. **How did the MP himself come to possess 70 BTC and 600 ETH?** Documents detailing the original transactions and data linking the declared assets to the specified dates are required.
2. **Which public identifiers correspond to the entries?** The name of the application remained in both the audited and subsequent forms. The NACP noted an explanation regarding security, but based on the declarations themselves, it is still impossible to reconcile the entries with the blockchain.
3. **How did a Maybach with a customs value of 9.64 million UAH end up in a contract for 1.5 million UAH?** Two figures and dates are publicly known. The answer depends on the terms of the transaction and the documents explaining the discrepancy.

The NACP's report provides specific figures, dates and references to source documents for these issues. The editorial team is prepared to update this article should Alexander Kizlyar provide a comment or documents explaining the acquisition of the crypto-assets and the terms of the car deal. [1] [2]

Sources

1. NAZK — Report No. 207/26 on the audit of the 2024 declaration, 20 March 2026
   https://nazk.gov.ua/wp-content/uploads/MonitoringFullcheck/2d/58/2d58c100e82cce9ae2efc6096fc1ca556fbeb78c95b18d14e2a086658c07d1d48225024.pdf
2. NAZK register — Kizlyar Jr's declaration for 2025, submitted on 31 March 2026
   https://public.nazk.gov.ua/documents/e10efddb-fac9-482b-ad4b-10d730e54b46
3. ANTICOR — article on Kizlyar Jr's cryptocurrency, 9 April 2024
   https://antikor.info/ru/articles/694891-hmeljnitskij_deputat-muljtimillioner_kizljar_s_narisovannoj_kriptoj_kak_nesovershenstvo_zakonodateljstva_pomogaet_legalizovatj_sostojanie
4. NAZK register — Kizlyar Jr's amended declaration for 2024, submitted on 10 April 2026
   https://public.nazk.gov.ua/documents/bc8dbd38-bb3b-4b88-9e2b-f8b85402a7c3
5. Khmelnytskyi District Administrative Court — Ruling No. 139794718 of 15 September 2026, Case No. 560/11808/26
   https://youcontrol.com.ua/catalog/court-document/139794718/
6. NAZK register — Kizlyar Jr's 2020 declaration
   https://public.nazk.gov.ua/documents/4fe3a5b3-91c5-424b-9454-ea4753c85f0c
7. NAZK register — Kizlyar Jr's declaration for 2023

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https://public.nazk.gov.ua/documents/ced0da3d-d2d2-4502-936e-6929653a5d21

8. NAZK register — Kizlyar Jr’s initial declaration for 2024, submitted on 30 April 2025
   https://public.nazk.gov.ua/documents/1bc89d8d-e166-4d28-aa92-0ed56b30555b
9. OpenDataBot — market valuation of the declared cryptocurrency as at 10 June 2026
   https://opendatabot.ua/analytics/crypto-declarations-2025
10. NAZK — clarifications on the declaration of intangible assets and public addresses
    https://wiki.nazk.gov.ua/category/deklaruvannya/hii-nematerialni-aktyvy/
11. Trust Wallet — company details and year of establishment
    https://trustwallet.com/about-us
12. Trust Wallet — guide to importing an existing wallet
    https://trustwallet.com/blog/product/how-to-import-your-wallet-from-metamask-to-trust-wallet
13. Ethereum Foundation — announcement of the launch of Frontier, 30 July 2015
    https://blog.ethereum.org/2015/07/30/ethereum-launches
14. Ethereum Foundation — announcement of the ETH presale, 22 July 2014
    https://blog.ethereum.org/en/2014/07/22/launching-the-ether-sale
15. Suspilne Khmelnytskyi — audit of a district councillor’s declaration
    https://suspilne.media/khmelnytskiy/1275614-nazk-vstanovilo-u-deklaracii-deputata-hmelnickoi-rajonnoi-radi-nedostovirni-dani-na-ponad-86-mln-grn/
16. NAZK — register of full audits, individual entries for city and district councillors
    https://nazk.gov.ua/uk/category/povni-perevirky/?f-page=92&f-per-page=10
17. Court cases — administrative case file No. 560/11808/26
    https://sudovispravy.com.ua/cases/560%2F11808%2F26
18. Suspilne Khmelnytskyi — a separate audit of Kizlyar Senior’s declaration
    https://suspilne.media/khmelnytskiy/1192434-nazk-vstanovilo-u-deklaracii-deputata-hmelnickoi-miskradi-nedostovirni-dani-na-ponad-388-mln-grn/
19. Khmelnytskyi City Council — Resolution No. 3 on the termination of powers dated 18 June 2026
    https://khm.gov.ua/uk/node/73876
20. Kartel-Khimprom — Alexander Kizlyar’s existing case file
    https://kartel-khimprom.com/ru/dossier/kizlyar-aleksandr/

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Original publication

https://kartel-khimprom.com/en/article/alexander-kizlyar-100-btc-with-no-address-and-a-maybach-worth-1-5-million-what-the-nacp-audit-revealed/

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