Background: According to Nominative First theory, Accusative is dependent on the assignment of Nominative elsewhere in the clause. To explain the anomalous appearance of Accusative on the Theme argument of Nominative-less unaccusatives and passives in Russian and Ukrainian, I appeal to two types of syntactic dependencies:

1. **Nominative First Dependency** (Marantz 1991)
   If Nominative is available it must be used

2. **VP Dependency**
   Accusative case marking is dependent on the existence of a higher VP-internal argument position

When the Theme argument appears alone in unaccusatives, it occurs in the Nominative:

3. Russian: šarik:Nom lopnut ‘the balloon burst’
   In unaccusatives consisting of a Theme argument together with a second, thematically higher VP-internal argument, the Theme is marked Accusative:

4. Russian: meny:Acc oslepiilo molniej:Inst ‘the lightning blinded me’
   Instrument and Source arguments are more prominent on thematic hierarchies than Themes; they are generated correspondingly higher in Spec,VP; the Theme is merged as V’s complement (Lavine & Franks, to appear).

Proposal: Case dependencies make reference to the presence of argument positions rather than to the presence of other cases (Marantz 1991). **Accusative remains the dependent case on Themes, even in unaccusatives, so long as it is dominated by an Instrument or Source.** The VP Dependency, then, has the potential to “bleed” Nominative First (cf. Locative Inversion, where the Theme is more prominent than the locative expression and, predictably, appears as Nominative).

When Nominative cannot be assigned due to non-agreeing (“defective”) morphology on T⁰ (a language-specific lexical resource), Accusative remains the only structural case available. This accounts for Accusative on the sole argument of Russian absolute impersonals (tošnit’) and Ukrainian passives in -no/-to. Otherwise, Accusative First syntax arises only as a result of the VP Dependency. Additional evidence for the VP Dependency is adduced from a non-passive use of Ukrainian -no/-to, in which one of two internal arguments is likewise marked Accusative.

Summary: Accusative is correctly stated as the dependent case. I demonstrate that this dependency ranges over argument positions, not morphological case.