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**Human Rights Council**  
Working Group on Arbitrary Detention**Opinions adopted by the Working Group on Arbitrary Detention at its 105th session, 23 March–1 April 2026**

**Opinion No. 30/2026 concerning Valeriy Maletskov, Vladimir Vladimirovich Pushkov, Aysulu Tastaybekova, Yevgeniy Abramov, Yana Abramova, Yevgeniy Leonidovich Dodolin, Tatyana Alekseevna Dodolina, Anton Sergeevich Novopashin, Gonkhi Venans Dzhakhi, Yuriy Ivanovich Pichugin, Andrey Sergeevic Plekhanov, Vladimir Nikolaevich Anufriev, Anastasia Vladimirovna Anufrieva, Andrey Viktorovich Mikholaev, Oksana Sergeevna Mikholaev, Viktor Viktorovich Chernobaev, Alena Stepanovna Chernobaeva, Oleg Vladimirovich Postnikov, Sergey Alexandrovich Naumenko, Andrey Valeryevich Vlasov, Andrey Emikovich Danielyan, Dmitry Sergeevich Terebilov, Anatoly Viktorovich Marunov, Anna Arnoldovna Safronova, Alexander Evgenyevich Ivshin and Boris Ivanovich Andreev (Russian Federation)\***

1. The Working Group on Arbitrary Detention was established in resolution 1991/42 of the Commission on Human Rights. In its resolution 1997/50, the Commission extended and clarified the mandate of the Working Group. Pursuant to General Assembly resolution 60/251 and Human Rights Council decision 1/102, the Council assumed the mandate of the Commission. The Council most recently extended the mandate of the Working Group for a three-year period in its resolution 60/8.

2. In accordance with its methods of work,<sup>1</sup> on 9 January the Working Group transmitted to the Government of the Russian Federation a communication concerning 26 individuals. The Government submitted a late response on 19 March 2026. The State is a Party to the International Covenant on Civil and Political Rights.

3. The Working Group regards deprivation of liberty as arbitrary in the following cases:

(a) When it is clearly impossible to invoke any legal basis justifying the deprivation of liberty (as when a person is kept in detention after the completion of his or her sentence or despite an amnesty law applicable to him or her) (category I);

(b) When the deprivation of liberty results from the exercise of the rights or freedoms guaranteed by articles 7, 13, 14, 18, 19, 20 and 21 of the Universal Declaration of

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\* In accordance with paragraph 5 of the Working Group's methods of work, Ganna Yudkivska could not participate in the discussion of the case. Miriam Estrada Castillo did not participate in the discussion of the case.

<sup>1</sup> A/HRC/36/38.

Human Rights and, insofar as States Parties are concerned, by articles 12, 18, 19, 21, 22, 25, 26 and 27 of the Covenant (category II);

(c) When the total or partial non-observance of the international norms relating to the right to a fair trial, established in the Universal Declaration of Human Rights and in the relevant international instruments accepted by the States concerned, is of such gravity as to give the deprivation of liberty an arbitrary character (category III);

(d) When asylum-seekers, immigrants or refugees are subjected to prolonged administrative custody without the possibility of administrative or judicial review or remedy (category IV);

(e) When the deprivation of liberty constitutes a violation of international law on the grounds of discrimination, based on birth, national, ethnic or social origin, language, religion, economic condition, political or other opinion, gender, sexual orientation, disability or any other status, that aims towards or can result in ignoring the equality of human beings (category V).

## **1. Submissions**

### **(a) Communication from the source**

4. According to the source, this communication concerns the following 26 individuals, including 7 women:

5. Valeriy Maletskov, a Russian national born on 13 September 1974, holder of passport No. 50 20 021467, residing in the Russian Federation.

6. Vladimir Vladimirovich Pushkov, a Russian national born on 26 October 1975, holder of passport No. 03 20 738244, residing in the Russian Federation.

7. Aysulu Tastaybekova, a Russian national born on 2 January 1972, holder of passport No. 46 16 472086, residing in the Russian Federation.

8. Yevgeniy Abramov, a Russian national born on 23 August 1976, holder of passport No. 69 21 982300, residing in the Russian Federation.

9. Yana Abramova, a Russian national born on 27 June 1981, holder of passport No. 32 01 343940, residing in the Russian Federation.

10. Yevgeniy Leonidovich Dodolin, a Russian national born on 10 February 1984, holder of passport No. 69 04 058872, residing in the Russian Federation.

11. Tatyana Alekseevna Dodolina, a Russian national born on 29 March 1995, holder of passport No. 69 19 887579, residing in the Russian Federation.

12. Anton Sergeevich Novopashin, a national of Kazakhstan born on 24 February 1991, holder of Passport No. 910224351230, residing in the Russian Federation.

13. Gonkhi Venans Dzhakhi, an Ivorian national of Côte d'Ivoire born on 18 November 1998, holder of passport No. 20AF30780, residing in the Russian Federation.

14. Yuriy Ivanovich Pichugin, a Russian national born on 17 July 1959, holder of passport No. 69 08 314806, residing in the Russian Federation.

15. Andrey Sergeevic Plekhanov, a Russian national born on 9 December 2000, holder of passport number 69 20 930638, residing in the Russian Federation.

16. Vladimir Nikolaevich Anufriev, a Russian national born on 2 September 1978, holder of passport No. 46 23 352663, residing in the Russian Federation.

17. Anastasia Vladimirovna Anufrieva, a Russian national born on 4 February 1983, holder of passport No. 46 13 264354, residing in the Russian Federation.

18. Andrey Viktorovich Mikholap, a Russian national born on 21 November 1968, holder of passport No. 22 13 145284, residing in the Russian Federation.

19. Oksana Sergeevna Mikholap, a Russian national born on 24 July 1974, holder of passport No. 22 20 053603, residing in the Russian Federation.

20. Viktor Viktorovich Chernobaev, a Russian national born on 10 April 1995, holder of passport No. 18 14 998829, residing in the Russian Federation.
21. Alena Stepanovna Chernobaeva, a Russian national born on 1 May 1997, holder of passport No. 22 17 806387, residing in the Russian Federation.
22. Oleg Vladimirovich Postnikov, a Russian national born on 24 January 1965, holder of passport No. 99 09 252431, residing in the Russian Federation.
23. Sergey Alexandrovich Naumenko, a Russian national born on 19 May 1987, holder of passport No. 03 06 496736, residing in the Russian Federation.
24. Andrey Valeryevich Vlasov, a Russian national, born on 19 November 1968, holder of passport No. 32 13 306820, residing in the Russian Federation.
25. Andrey Emikovich Danielyan, a Russian national born on 13 March 1969, holder of passport No. 01 13 955274, residing in the Russian Federation.
26. Dmitry Sergeevich Terebilov, a Russian national born on 2 January 1980, holder of passport No. 34 07 879166, residing in v.
27. Anatoly Viktorovich Marunov, a Russian national born on 10 November 1953, holder of passport No. 45 98 651763, residing in the Russian Federation.
28. Anna Arnoldovna Safronova, a Russian national born on 22 July 1965, holder of passport No. 18 10 500153, residing in the Russian Federation.
29. Alexander Evgenyevich Ivshin, a Russian national born on 21 August 1957, holder of passport No. 03 03 318587, residing in the Russian Federation.
30. Boris Ivanovich Andreev, a Russian national born on 15 November 1951, holder of passport No. 05 03 588677, residing in the Russian Federation.

(i) *Context*

31. According to the source, this case highlights ongoing, large-scale criminalization of worship by and association of Jehovah's Witnesses by the Russian authorities. That is attributed to the application of article 282.2 (1), 282.2 (1.1), 282.2 (2), or 282.3 (1) of the Criminal Code. As of 23 December 2025, at least 900 Jehovah's Witnesses have been charged under article 282.2 and/or 282.3. At least 503 individuals, including 38 women, have been placed in pretrial detention or under house arrest, and the homes of over 2,200 Jehovah's Witnesses have been subjected to police raids.

32. The decision of 20 April 2017 of the Supreme Court of the Russian Federation ordered the liquidation of the national Administrative Centre of Jehovah's Witnesses and all 395 local religious organizations of Jehovah's Witnesses in the Russian Federation, designating them as extremist organizations (hereafter "the liquidation decision"). Since the Supreme Court's decision, 662 Jehovah's Witnesses have been convicted.

33. Article 282.2 (1) of the Criminal Code stipulates that organizing the activities of an organization recognized as extremist is punishable with a fine of 400,000–800,000 roubles (or the person's income for 2 to 4 years) or imprisonment for 6 to 10 years, along with a ban on holding certain positions or engaging in specific activities for up to 10 years, and restricted liberty for 1 to 2 years. Article 282.2 (1.1) provides that inducing, recruiting or otherwise involving a person in the activities of an extremist organization is punishable by a fine of 300,000–700,000 roubles (or the person's income for 2 to 4 years), or compulsory labour for 2 to 5 years, with a ban on certain positions or activities for up to 5 years, plus restriction of freedom for 1 to 2 years, or imprisonment for 4 to 8 years, with restriction of freedom for 1 to 2 years.

34. Article 282.2 (2) of the Criminal Code provides that participation in the activities of an extremist organization a fine of 300,000–600,000 roubles (or the person's income for 2 to 3 years), or compulsory labour for 1 to 4 years, with or without a ban on certain positions or activities for up to 3 years, plus restricted liberty for up to 1 year, or imprisonment for 2 to 6 years, with or without a ban on certain positions or activities for up to 5 years, and restricted liberty for up to 1 year. Article 282.3 (1) stipulates that providing or collecting funds, or

providing financial services, knowingly intended to finance the organization, preparation and commission of at least one crime of an extremist nature, or to support the activities of an extremist community or an extremist organization, shall be punishable by a fine of 300,000-700,000 roubles (or the person's income for 2 to 4 years), or compulsory labour for 1 to 4 years, with or without a ban on certain positions or activities for up to 3 years, plus restriction of liberty for up to 1 year, or imprisonment for 3 to 8 years.

35. International bodies have condemned the criminalization of worship by and the association of Jehovah's Witnesses by the Russian authorities as incompatible with the Covenant and regional human rights guarantees. The European Court of Human Rights has issued five judgments concerning Jehovah's Witnesses in the Russian Federation,<sup>2</sup> holding inter alia that the criminal prosecution of the peaceful practice of the Jehovah's Witnesses' religion was based on an impermissibly broad and arbitrarily applied anti-extremism legislation.

36. The Committee of Ministers of the Council of Europe and the Human Rights Committee have also held that the targeting of Jehovah's Witnesses by the Russian Federation violates their human rights.<sup>3</sup>

37. The source recalls the opinion of the Working Group, in which it held that the detention and prosecution of Jehovah's Witnesses in the Russian Federation were arbitrary under categories I, II, III and V.<sup>4</sup>

(ii) *Arrests, detentions and criminal proceedings*

In Novossibirsk

38. The source reports that, on 19 April 2019, Mr. Valeriy Maletskov was arrested and taken to the Federal Security Service (FSB) Department of Novossibirsk Oblast for interrogation during a raid on the homes of six Jehovah's Witnesses in Novossibirsk. A formal record of his detention was drawn up on 20 April 2019. Mr. Maletskov remained in police custody for two days.

39. Oktyabrsky District Court of Novossibirsk ordered that Mr. Maletskov be placed under house arrest for 1 month and 29 days, until 19 June 2019, on suspicion of having committed an offence under article 282.2 (2) of the Criminal Code. He was alleged to have actively promoted the banned organization Jehovah's Witnesses, participated in their religious meetings and disseminated their ideology in Novossibirsk. These allegations, together with standard references to preventing flight or interference with the investigation, were the only grounds cited for the house arrest. Mr. Maletskov was also prohibited from sending or receiving correspondence or using any means of communication, including the Internet.

40. Oktyabrsky District Court of Novossibirsk granted two extensions of Mr. Maletskov's house arrest – first until 19 August 2019 and then until 19 October 2019 – on the motion of the investigator. Mr. Maletskov spent 182 days under house arrest.

41. On 17 October 2019, a senior investigator of the Investigative Department Directorate of FSB of Novossibirsk Oblast ordered the release of Mr. Maletskov from house arrest and placed him under a recognizance agreement. Mr. Maletskov subsequently spent a total of

<sup>2</sup> European Court of Human Rights: *Taganrog LRO and others v. Russia*, application Nos. 32401/10 and 19 others, Judgment, 7 June 2022, paras. 256–273; *Polyakov and others v. Russia*, application No. 32532/18 and 8 others, Judgment, 18 July 2024, paras. 7–12; *Loginov and others v. Russia*, application No. 10618/19, Judgment, 6 March 2025, paras. 8–10; *Kirov LRO and Dmitriyevykh v. Russia*, application No. 29296/18, Judgment, 10 July 2025, paras. 9–12; and *Markin and others v. Russia*, application No. 20519/18, Judgment, 16 October 2025, paras. 10–14.

<sup>3</sup> Committee of Ministers, Decisions concerning *Jehovah's Witnesses of Moscow and Others v. Russian Federation*, 25 September 2019 and 1 October 2020, CM/Del/Dec (2019)1355/H46-19; and Human Rights Committee, *Yurlov, Beklyaev and Nesterov v. Russian Federation* (CCPR/C/139/D/2925/2017); and *Pavlenko, Kondratenko and Baryshev v. Russian Federation* (CCPR/C/139/D/2765/2016).

<sup>4</sup> Opinions No. 11/2019, No. 34/2019 and No. 10/2020.

1,522 days under this recognizance agreement until his conviction by the court of first instance.

42. On 24 November 2021, Mr. Maletskov was charged under article 282.2 (1) of the Criminal Code on the ground that he allegedly acted as the organizer and spiritual leader of followers of the Jehovah's Witnesses' doctrine. He was accused of choosing convenient times and conducting meetings in secrecy, allowing his home to be used for meetings, organizing the receipt of educational videos and "Watchtower" magazines, coordinating preaching activities and undertaking other actions to promote and disseminate the doctrine of Jehovah's Witnesses.

43. Mr. Maletskov was convicted under article 282.2 (1) on 18 December 2023 by Novossibirsk District Court and sentenced to six years in a penal colony. His appeal was dismissed by the same court on 14 January 2025 and he was transferred to serve his sentence in the penal colony.

In Tomsk

44. The source reports that, on 20 March 2025, armed officers of the police, FSB and the Investigative Committee conducted a special operation targeting local Jehovah's Witnesses in Tomsk. Vladimir Vladimirovich Pushkov, Aysulu Tastaybekova, Yevgeniy Abramov, Yana Abramova, Yevgeniy Leonidovich Dodolin and Tatyana Alekseevna Dodolina (three men and three women) were arrested and detained. They each spent one day in police custody before being placed in pretrial detention.

45. Mr. Pushkov was charged under article 282.2 (1) for organizing the meetings of Jehovah's Witnesses in Tomsk.

46. The other five detainees were charged under article 282.2 (2) for participation in the activities of the same religious organization, including "holding conversations for the purpose of propaganda and in directly taking part in events conducted by it, including collective discussions of materials of the religious organization of Jehovah's Witnesses". The criminal cases of all six detainees were joined in a single set of proceedings and investigated together.

47. On 21 March 2025, Kirovsky District Court of Tomsk placed all six detainees in custody for two months, until 20 May 2025. No evidence was produced to substantiate the suspected commission of a criminal offence and the only justification offered for the pretrial detention was the typical assertion that it was necessary to prevent absconding or interference with the investigation. The court continued to grant repeated applications by the investigator to extend the pretrial detention of the detainees until 19 January 2026. All appeals against the custody orders and extensions have been dismissed.

48. On 30 May 2025, another special operation targeting Jehovah's Witnesses was carried out in Tomsk, during which Anton Sergeevich Novopashin, Gonkhi Venans Dzhakhi, Yuriy Ivanovich Pichugin and Andrey Sergeevic Plekhanov (four men) were detained. They were held in police custody for one day.

49. The four detainees were charged under article 282.2 (2) of the Criminal Code for participation in the activities of the religious organization Jehovah's Witnesses. The charge repeats verbatim the allegations brought against five of the detainees in the first group arrested. The criminal cases of these four detainees were joined with those of the six detainees in the first group in a single set of proceedings and are being investigated together.

50. On 31 May 2025, Kirovsky District Court of Tomsk placed all four detainees in pretrial detention for 1 month and 21 days, until 20 July 2025. No evidence was produced to justify the suspicion that the detainees had committed any criminal offence. The custodial detentions were imposed without an individualized assessment of the personal circumstances of each detainee.

51. The Court granted the repeated applications by the investigator for extension of the pretrial detention until 19 January 2026. All appeals against the custody orders and extensions have been dismissed.

## In Kstovo

52. According to the source, mass searches of the homes of Jehovah's Witnesses were conducted on 2 July 2024 in Aktyubinsk in Astrakhan Oblast. During those operations, a married couple, Vladimir Nikolaevich Anufriev and Anastasia Vladimirovna Anufrieva were detained and transferred to Kstovo in Nizhny Novgorod Oblast, on 3 July 2024, at more than 1,100 km. On 2 July 2024, two married couples from Kstovo – Andrey Viktorovich Mikholaev and Oksana Sergeevna Mikholaev, and Viktor Viktorovich Chernobaev and Alena Stepanovna Chernobaeva – were detained in Kstovo.

53. On 3 July 2024, Kstovo City Court of Nizhny Novgorod Oblast placed Mr. Anufriev, Ms. Anufrieva and Mr. Mikholaev in custody for 1 month and 15 days, until 16 August 2024. On 4 July 2024, the same court placed Ms. Mikholaev, Mr. Chernobaev and Ms. Chernobaeva in custody for 1 month and 15 days, also until 16 August 2024. No evidence was presented to substantiate that there were reasonable grounds to suppose that a criminal offence had been committed, and the imposition of pretrial detention was based on typical assertions of the necessity of detention to prevent absconding or the continuation of criminal activity.

54. Nizhny Novgorod District Court, Nizhny Novgorod Oblast Court and Kstovo City Court repeatedly extended the pretrial detention of all six detainees until 3 March 2026. All appeals against the custody orders and extensions have been dismissed.

55. The criminal case concerning all six detainees is currently being considered by the court of first instance. Mr. Anufriev, Mr. Mikholaev and Mr. Chernobaev are charged under article 282.2 (1) for "assigning roles and functions among participants, preparing instructions on the time and dates of meetings of congregation members and carrying out certain one-time actions to maintain and develop the religious organization ... in the territory of Kstovo, Nizhny Novgorod Oblast". Ms. Anufrieva, Ms. Mikholaev and Ms. Chernobaeva are charged under article 282.2 (2) for "engaging in propaganda activities of Jehovah's Witnesses" and participating in their meetings in Kstovo.

## In Birobidzhan

56. According to the source, Oleg Vladimirovich Postnikov was initially found guilty under articles 282.2 (2) and 282.2 (1.1) for "participation in religious activities for studying and spreading the ideology of Jehovah's Witnesses", and was given a suspended sentence of five years and six months' imprisonment. A second criminal case was initiated against Mr. Postnikov on 21 March 2025 by the Directorate of FSB for the Jewish Autonomous Oblast.

57. On 3 April 2025, searches targeting Jehovah's Witnesses were carried out in Birobidzhan, during which Mr. Postnikov was arrested and detained in police custody for one day.

58. On 4 April 2025, Birobidzhan District Court of the Jewish Autonomous Oblast placed Mr. Postnikov in pretrial detention for one month and 18 days, until 20 May 2025. No evidence was presented justifying the suspected commission of a criminal offence, and the ground for the pretrial detention was based on typical assertions of the need to prevent escape and interference with investigation through destruction of evidence, and the probable continuation of criminal activity.

59. Birobidzhan District Court repeatedly granted the applications to extend Mr. Postnikov's pretrial detention, until 19 April 2026.

60. Each extension relied on the allegation that Mr. Postnikov had "organized the activities of an extremist local religious organisation of Jehovah's Witnesses in Birobidzhan by arranging secret meetings held via the Internet ... during which he ... promoted the religious teachings of Jehovah's Witnesses". All appeals against the custody orders and extensions have been dismissed.

## In Konakovo

61. According to the source, on 6 July 2021, searches and interrogations were conducted by the authorities at the homes of Jehovah's Witnesses in Konakovo in Tver Oblast, including the home of Sergey Alexandrovich Naumenko. Subsequently, Mr. Naumenko was charged

under article 282.2 (1) for “assisting in holding meetings and, as necessary, conducting them independently; engaging in preaching activity and spreading the beliefs of Jehovah’s Witnesses among residents of the Konakovo District of Tver Oblast.”

62. Mr. Naumenko left the Russian Federation in March 2025 and moved to the Belarus, where he applied for asylum.

63. The Russian Federation requested Mr. Naumenko’s extradition, which led to his detention in Belarus. On 12 June 2025, he was placed in custody pursuant to a decision by the Deputy Prosecutor of Brest, where he remained until 18 August 2025, when the General Prosecutor’s Office of Belarus refused the extradition request, finding that he had committed no crime. Nevertheless, Mr. Naumenko was removed to the Russian Federation without formal documentation, based on an agreement between the secret services of the Russian Federation and Belarus, on the night of 5 to 6 December 2025.

64. Mr. Naumenko was placed in police custody upon his arrival in the Russian Federation on 6 December 2025. On the basis of a decision of Konakovo City Court of Tver Oblast, dated 27 March 2025, he was transferred to Pretrial Detention Centre No. 1 for two months. Mr. Naumenko remains in pretrial detention.

65. On the 22 December 2025, Tver Oblast Court dismissed the appeal against Mr. Naumenko’s pretrial detention. On the same day, the hearing of his criminal case commenced in Konakovo City Court of Tver Oblast.

#### In Prokopyevsk

66. According to the source, on 12 July 2020, two of the three searches in Prokopyevsk in Kemerovo Oblast, were conducted at Andrey Valeryevich Vlasov’s home and workplace. Thereafter, he was transported approximately 200 km to Kemerovo, where he was interrogated and held in police custody for two days. Mr. Vlasov has a disability, suffering from coxarthrosis, omarthrosis, absolute spinal canal stenosis that effectively immobilizes him, ischemic heart disease and other comorbidities.

67. On 14 July 2020, Mr. Vlasov was placed under house arrest until 2 September 2020 by the Central District Court of Kemerovo. He could leave his residence only for a two-hour walk daily within the grounds of his home. He was prohibited from using any means of communication, including the Internet, and could only communicate with his wife, lawyer, investigator and supervisor authorities.

68. The court repeatedly extended Mr. Vlasov’s house arrest until a conviction was rendered by the first-instance court. By the day of the verdict, he had spent 678 days under house arrest. For the numerous extensions of house arrests, Mr. Vlasov was required to travel more than 200 km from his home to the court, accompanied by a supervisory officer, despite his severe health conditions. On 30 November 2021, the daily walks were revoked and subsequent requests for permission to walk to visit his doctors and appeals against the house arrests were all denied.

69. On 23 May 2022, Mr. Vlasov was convicted under article 282.2 (1) by the Central District Court of Prokopyevsk for seeking to recruit new Jehovah’s Witnesses, conducting training and meetings, conveying information on the doctrine and supervising preaching activity. Mr. Vlasov was sentenced to seven years in a penal colony.

70. Mr. Vlasov was taken into custody following the verdict. On 26 July 2022, all appeals against his conviction were dismissed by the appellate courts. All applications for his release on medical grounds were reportedly denied.

71. As of 23 December 2025, Mr. Vlasov had served 1,245 days in a penal colony and remains imprisoned to date.

#### In Rubtsovsk

72. According to the source, Andrey Emikovich Danielyan was arrested by armed officers of the police, FSB and the Investigative Committee during the special operation “Armageddon” across various cities in Altai Territory, targeting local Jehovah’s Witnesses.

73. Mr. Danielyan was subsequently charged under article 2.82.2 (1) for organizing the activities of the local religious organization of Jehovah's Witnesses in Rubtsovsk and a travel restriction order was imposed on him. Mr. Danielyan remained in pretrial detention for a total of 80 days, until 26 January 2023, a period covering his conviction and the dismissal of his appeal.

74. On 7 November 2022, Mr. Danielyan was convicted under article 282.2 (1) by Rubtsovsk City Court of Altai Territory for giving lectures, showing audio and video materials, explaining religious teachings and engaging in discussions during meetings of Jehovah's Witnesses. Mr. Danielyan was sentenced to six years in a penal custody.

75. Mr. Danielyan was taken into custody following the verdict. On 26 January 2023, the appeal against his conviction was dismissed by the appellate court.

76. On 8 July 2025, while in detention, an additional criminal case was initiated against him under article 282.2 (1.1) for allegedly involving another inmate in the activities of an extremist organization, based on conversations he had about his faith.

#### In Kostroma

77. According to the source, Dmitry Sergeevich Terebilov, a previously convicted person, became a Jehovah's Witness while serving his sentence. On 25 July 2018 and 4 July 2019, searches were conducted in his apartment, and he was subsequently charged under article 282.2 (2) for actively participating in the activities of the Jehovah's Witnesses religious organization. A travel restriction order was imposed on him until his conviction by the court of first instance.

78. On 6 September 2021, Mr. Terebilov was found guilty under article 282.2 (2) by Sverdlovsky District Court of Kostroma of conducting conversations, promoting the activities of a banned organization, participating in the distribution of religious literature and materials and engaging in meetings and preaching activities of the Jehovah's Witness religion. Mr. Terebilov was sentenced to three years in a penal colony with a strict regime.

79. Mr. Terebilov was taken into custody following the verdict. On 12 January 2022, his appeal against the conviction was dismissed by the appellate court.

80. Mr. Terebilov fully served his sentence from 6 September 2021 to 5 September 2024 and was due to be released on 5 September 2024. However, prior to his release, a new criminal case was initiated against him under articles 282.2 (1.1) and 282.2 (2) for alleged participation in the activities of an extremist organization, consisting of conveying information about the beliefs of Jehovah's Witnesses to two fellow prisoners.

81. On 26 August 2024, Sverdlovsky District Court of Kostroma ordered Mr. Terebilov's detention until 25 November 2024, which was subsequently extended once, until 25 January 2025. All appeals against the detention orders were dismissed. Mr. Terebilov spent a total of 264 days in pretrial detention prior to the final verdict in the second criminal case. On 23 January 2025, Mr. Terebilov was sentenced to a further five years' imprisonment in a penal colony with a strict regime. This sentence was changed on 28 May 2025 by Kostroma Regional Court to 5 years and 10 months.

#### In Moscow

82. According to the source, on 20 October 2021, armed officers of the police, FSB, and the Investigative Committee carried out a special operation involving searches and interrogations, targeting local Jehovah's Witnesses in Moscow and Moscow Oblast, during which Anatoly Viktorovich Marunov was interrogated and held in police custody for two days.

83. On 22 October 2021, Savelovsky District Court of Moscow placed Mr. Marunov under house arrest, until 20 December 2021, on suspicion of having committed an offence under article 282.2 (1). No evidence was presented to substantiate the suspicion and the ground for the house arrest relied on the typical assertions of preventing escape and interference with the investigation. The house arrest posed risks to his health as an elderly person by restricting access to full medical care and regular walks. Mr. Marunov was also

prohibited from sending or receiving correspondence and from using any means of communication, including the Internet.

84. The court repeatedly extended Mr. Marunov's house arrest, until 7 June 2023. All appeals against these extensions were denied, and Mr. Marunov spent a total of 629 days under house arrest before his conviction.

85. On 12 July 2023, Mr. Marunov was found guilty under article 282.2 (1) by the Savelovsky District Court of Moscow for organizing the functioning of the local religious organization of Jehovah's Witnesses in Moscow under the guise of holding worship services. Mr. Marunov was sentenced to six years and six months in a penal colony.

86. Mr. Marunov was taken into custody following the verdict and remained. On 3 October 2023, the appeal against his conviction was dismissed by the appellate court. As of 23 December 2025, Mr. Marunov had served a total of 445 days in a penal colony.

#### In Astrakhan

87. According to the source, Anna Arnoldovna Safronova's house was searched on 2 June 2021 in connection with a criminal case initiated against her, during which she was interrogated and detained in police custody for one day.

88. On 3 June 2021, Kirovsky District Court of Astrakhan placed Ms. Safronova under house arrest for 1 month and 25 days, until 27 July 2021. No evidence was presented to justify that she could be reasonably suspected of having committed a criminal offence and the ground for the house arrest relied on the typical assertion of preventing escape. The court allegedly failed to consider that Ms. Safronova lived with her elderly mother, who was fully dependent on her.

89. Kirovsky and Trusovsky District Courts of Astrakhan repeatedly extended Ms. Safronova's house arrest and all appeals against those decisions were dismissed. Prior to the verdict of the court of first instance, Ms. Safronova had spent 236 days under house arrest.

90. On 25 January 2022, Ms. Safronova was found guilty under articles 282.2 and 282.3 (1) by Trusovsky District Court of Astrakhan for participating in religious online meetings that included singing and prayers to Jehovah God, as well as for monitoring the receipt of monetary contributions from participants and congregants. Ms. Safronova was sentenced to six years in a penal colony.

91. Ms. Safronova was taken into custody following the verdict. On 14 April 2022, all appeals against her conviction were dismissed by the appellate courts.

92. As of 23 December 2025, Ms. Safronova had served 1,349 days in a penal colony and remains imprisoned. She is being subjected to torture by the administration of the correctional facility, allegedly aimed at forcing her to renounce her religious beliefs.

#### In Kholmskaya

93. According to the source, on 29 April 2020, armed officers of the police, FSB and representatives of the local Cossacks carried out a special operation targeting local Jehovah's Witnesses in Kholmskaya in Abinsk District, Krasnodar Territory, during which Alexander Evgenyevich Ivshin was interrogated. Subsequently, he was charged under article 282.2 (1) for organizing the activities of the local religious organization of Jehovah's Witnesses in Abinsk and a travel restriction order was imposed on him until his conviction by the court of first instance.

94. On 10 February 2021, Mr. Ivshin was convicted under article 282.2 (1) by Abinsk District Court of Krasnodar Territory for singing religious songs with others, praying, discussing the Bible and organizing a viewing of videos and illustrations depicted in Jehovah's Witnesses' religious literature. Mr. Ivshin was sentenced to seven years and six months in a penal colony.

95. Mr. Ivshin was taken into custody following the verdict. On 15 April 2021, all appeals against his conviction were dismissed by the appellate courts.

96. As of 23 December 2025, Mr. Ivshin had served 1,712 days in a penal colony and remains imprisoned. Following a decision of the Human Rights Committee,<sup>5</sup> Mr. Ivshin petitioned the prosecutor for a review of his sentence; his request was rejected.

In Yaroslavsky

97. According to the source, on 6 October 2022, Boris Ivanovich Andreev's home was searched by armed police and FSB officers, during which he was interrogated and held in police custody for one day.

98. On 7 October 2022, Khorolsky District Court of Primorye Territory ordered Mr. Andreev's detention for 22 days, until 28 October 2022, without presenting evidence to justify a reasonable suspicion of criminal activity. Further, no concrete grounds for pretrial detention were provided, aside from typical assertions of preventing escape and interference with the investigation. The court allegedly failed to consider Mr. Andreev's old age and the associated health risks of detention.

99. Mr. Andreev's pretrial detention was repeatedly extended and all appeals against the detention and extensions were dismissed. At the time of Mr. Andreev's conviction by the first-instance court, he had spent 643 days in pretrial detention.

100. On 10 July 2024, Mr. Andreev was convicted under article 282.2 (1) by Khorolsky District Court of Primorye Territory for organizing and conducting meetings, preaching, scheduling and rescheduling meetings, selecting materials for study and downloading, studying and distributing literature published by the organization. Mr. Andreev was sentenced to six years in a penal colony.

101. On 3 October 2024, the appeal against his conviction was dismissed by the appellate court.

102. As of 23 December 2025, Mr. Andreev had served 445 days in a penal colony and remains imprisoned while awaiting the consideration of his cassation appeal.

103. Prolonged detention and lack of physical activity have caused Mr. Andreev to develop heart problems and dizziness. He has also been diagnosed with a pre-stroke condition requiring specialist monitoring, which is practically impossible to obtain under the conditions of his detention.

(iii) *Legal analysis*

104. The source argues that the case of the 26 individuals satisfies the criteria for categories I, II, III and V.

a. Categories I, II and III

105. The source argues that the 26 individuals were subjected to arbitrary arrest and detention in three respects: (a) the periods during which they were held in police custody; (b) the periods of their court-ordered pretrial detention and repeated extensions; and (c) the periods of house arrest and repeated extensions, which in each case constituted a form of deprivation of liberty amounting to detention and was equivalent in practice to confinement in their own homes.

106. The source claims that the sole purpose of the arrests and detentions was to punish the peaceful exercise of the individuals' freedom of religion as Jehovah's Witnesses.

107. The source submits that the arrests and detentions used to punish peaceful worship and related religious activities of the 26 individuals are "arbitrary" under article 9 (1) of the Covenant and the imposition or continuation of pretrial detention without specific, individualized, evidence-based necessity contravenes article 9 (3) of the Covenant.

108. The source recalls that the Human Rights Committee has recognized that the right to freedom of religion protects the preparation and distribution of religious texts or

<sup>5</sup> *Pavlenko et al. v. Russian Federation* (CCPR/C/139/D/2765/2016).

publications.<sup>6</sup> The European Court of Human Rights has similarly held that collective worship and reading of religious texts constitutes a protected manifestation of religion.<sup>7</sup>

109. The source recalls that freedom of expression includes participation in religious discourse<sup>8</sup> and that freedom of association is an essential aspect of the right to freedom of religion. Accordingly, the source submits that the peaceful religious activities of the 26 individuals are protected under articles 18, 19 and 21 of the Covenant.

110. The source further argues that any restriction on these rights must meet strict standards of necessity and proportionality.<sup>9</sup>

111. The source recalls that the only justification offered by the State authorities is the liquidation decision. However, this decision has been found to contravene fundamental principles, including freedom of religion and freedom of association.<sup>10</sup>

112. The source submits that the actions of the State constitute a violation of the rights of the 26 individuals under articles 18 (1) and (2), 19 (1) and (2) and 21 of the Covenant.

113. The source recalls that article 17 of the Covenant guarantees the protection against arbitrary and unlawful interference with privacy, family, home or correspondence. The source argues that, in this case, the existence of a court order authorizing the searches does not render them lawful, as the sole purpose of these searches and seizures was to suppress the peaceful practice of religion by Jehovah's Witnesses, contrary to the Covenant. The Human Rights Committee and the European Court of Human Rights have held, in the context of Jehovah's Witnesses, that such raids, searches and seizures fail to meet the standards of necessity and proportionality.<sup>11</sup>

114. The source submits that the police raids and home searches and the seizure of personal belongings, including religious literature, were both unlawful and arbitrary within the meaning of article 17 (1) and (2) of the Covenant.

115. The source recalls that article 7 of the Covenant prohibits torture and cruel, inhuman or degrading treatment or punishment.<sup>12</sup>

116. The source submits that article 7 has been violated in this case, as the individuals were subjected to extended periods of pretrial detention, house arrest and imprisonment not for any violence but solely on account of their participation in peaceful religious activities as Jehovah's Witnesses.

117. The source submits that the cumulative impact of these liberty-restricting measures, combined with coercive and stigmatizing practices, constitutes a grave affront to their dignity and reaches the threshold of serious mental suffering, amounting to inhuman or degrading treatment within the meaning of article 7.<sup>13</sup>

b. Category V

118. The source argues that State authorities have denied all individuals the right to profess and practise their religion as Jehovah's Witnesses, thereby constituting discrimination.<sup>14</sup>

<sup>6</sup> Human Rights Committee, general comment No. 22 (1993) on the right to freedom of thought, conscience and religion, para. 4; and opinion No. 42/2015, paras. 40-43.

<sup>7</sup> European Court of Human Rights, *Krupko and others v. Russia*, application No. 26587/07, judgment, 26 June 2014, paras. 64-66; and *Leven v. Kazakhstan* (CCPR/C/112/D/2131/2012), para. 9.4.

<sup>8</sup> Human Rights Committee, general comment No. 34 (2011) on the freedoms of opinion and expression, para. 11.

<sup>9</sup> See *Mullina et al. v. Uzbekistan* (CCPR/C/138/D/3025/2017-CCPR/C/138/D/3037/2017), para. 8.14.

<sup>10</sup> *Taganrog LRO and others v. Russia*, paras. 243-255; and opinion No. 11/2019, para. 77.

<sup>11</sup> *Mullina et al. v. Uzbekistan*, para. 8.14, and *Taganrog LRO and others v. Russia*, para. 254.

<sup>12</sup> See also Human Rights Committee, general comment No. 20 (1992) on the prohibition of torture or other cruel, inhuman or degrading treatment or punishment, paras. 2 and 5.

<sup>13</sup> *Ibid.*

<sup>14</sup> See Human Rights Committee, general comment No. 18 (1989) on non-discrimination, paras. 7 and 13.

119. The source asserts that, in the present case, the 26 individuals were treated differently from adherents of majority religions in the Russian Federation, who are able to worship freely without being subjected to raids, arrests, home searches, detention or public stigmatization. Such differential treatment lacks any objective and reasonable justification within the meaning of article 26 of the Covenant. The discriminatory nature of the treatment of Jehovah's Witnesses, as well as the State's failure to uphold its duty of neutrality and impartiality, has been affirmed by both the European Court of Human Rights and the Working Group.<sup>15</sup>

120. The source submits that all 26 individuals have suffered a violation of their rights under article 26 of the Covenant.

121. On 19 March 2026, the source reported that Mr. Postnikov had been convicted on 12 February 2026 by Birobidzhan District Court. He had been sentenced to six years and two months of imprisonment and has appealed the decision. The source also flagged a correction in relation to Mr. Andreev: he is not awaiting consideration of his cassation appeal, as it had already been dismissed on 3 October 2024.

**(b) Response from the Government**

122. On 9 January 2026, the Working Group transmitted the allegations from the source to the Government of the Russian Federation under its regular communications procedure. The Working Group requested the Government to provide detailed information by 10 March 2026 about the current situation of the 26 individuals. The Working Group also requested the Government to clarify the legal provisions justifying their detention, as well as its compatibility with the State's obligations under international human rights law and, in particular, with regard to the treaties ratified by the State. Moreover, the Working Group called upon the Government to ensure their physical and mental integrity.

123. The Government submitted its response on 19 March 2026, after the deadline. It did not request an extension of the time limit, as provided for in the Working Group's methods of work.<sup>16</sup> Consequently, the Working Group cannot accept the response as if it were submitted within the time limit.

**2. Discussion**

124. In determining whether the detention of the 26 individuals – comprising 19 men and 7 women – was arbitrary, the Working Group has regard to the principles established in its jurisprudence to deal with evidentiary issues. If the source has established a prima facie case for breach of international requirements constituting arbitrary detention, the burden of proof should be understood to rest upon the Government if it wishes to refute the allegations.<sup>17</sup>

125. The Working Group regrets that it did not receive a timely response from the Government to the communication. In the absence of such a response, and on the basis of all the information the Working Group has received, it has decided to render the present opinion in conformity with paragraph 16 of its methods of work.

**(a) Category I**

126. The Working Group will first consider whether there have been violations under category I, which concerns deprivation of liberty without legal basis.

127. The source submits that the arrests and detentions of the 26 individuals are "arbitrary" as pretrial detention imposed without specific, individualized, evidence-based necessity contravenes article 9 (3). In its late response, the Government argues that the religious

<sup>15</sup> *Taganrog LRO and others v. Russia*, para. 254; and opinions No. 11/2019, paras. 76-77; No. 34/2019, paras. 52-54, 57, 61-63, 65, 67 and 68; and No. 10/2020, paras. 64, 65, 71-76, 78, 80 and 81. See also European Court of Human Rights: Grand Chamber, *İzzettin Doğan and others v. Turkey*, application No. 62649/10, judgment, 26 April 2016, para. 170; and *Hoffmann v. Austria*, application No. 12875/87, 23 June 1993, para. 33.

<sup>16</sup> A/HRC/36/38, para. 16.

<sup>17</sup> A/HRC/19/57, para. 68.

organization Administrative Centre of Jehovah's Witnesses in Russia and several other Jehovah's Witnesses organizations were designated as extremist organizations on the grounds provided for by article 9 of the Federal Law on countering extremist activity and associated instruments. It clarifies that the law permits such designation where the organizations engage in extremist activity that results in the violation of rights and freedoms, causes harm to individuals, the health of citizens, environment, public order, public safety, property or legitimate economic interests or creates a real threat of causing such harm. The Government argues that the various individuals of the case were subjected to criminal charges under Russian laws for their engagement with these proscribed organizations and that they were properly detained on this basis. It notes that they were subjected to pretrial detention whether in prisons or their houses.

128. The Working Group recalls the view of the Human Rights Committee, as well as its own recurrent findings, that pretrial detention must be the exception and not the rule, should be ordered for as short a time as possible<sup>18</sup> and must be based on an individualized determination that it is reasonable and necessary, taking into account all the circumstances, for such purposes as to prevent flight, interference with evidence or the recurrence of crime.<sup>19</sup> Courts must examine whether alternatives to pretrial detention would render detention unnecessary in the case in question.<sup>20</sup> The Human Rights Committee has written that "mere conjecture" about risks "does not justify an exception to the rule laid down in article 9, paragraph 3" and that individualized, evidence-based reasons are required.<sup>21</sup>

129. The Working Group notes that, of the 26 individuals, 24 were subjected to pretrial detention of some form, whether in their own homes or other detention centres.<sup>22</sup> Noting the lack of detail provided by the Government, the Working Group considers that house arrest constitutes detention in the present circumstances. Given the lack of explanation from the Government, other than a mention that individuals were subjected to "protective" or "preventive" measures of detention (whether in detention centres or their own homes), the Working Group concludes that the pretrial detention to which these individuals were subjected violated article 9 (3) of the Covenant. The Working Group is particularly concerned that 17 of the detainees have reportedly been held in some form of ongoing pretrial detention for several years since 2019. This exacerbates the severity of their unfounded pretrial detention, further confirming the violations under category I.

130. In relation to one of the 24 individuals, Mr. Naumenko, the Working Group notes that he fled to Belarus, where an extradition request from the Russian Federation was reportedly refused on the basis that it was not shown he had committed any crime. However, the Russian and Belarusian security forces reportedly jointly renditioned him back to Russia where he was detained in pretrial detention. The Working Group considers, in the absence of a response from the Government, that this also amounts to a violation of article 9 (3) of the Covenant and article 9 of the Universal Declaration of Human Rights, as it was not shown why a lesser restriction, such as a travel ban, would not have been sufficient to address the risk of his further absconding.

131. The source argues that the searches of several of the 26 individuals' houses were in violation of article 17 of the Covenant guarantees for the protection against arbitrary and unlawful interference with privacy, family, home or correspondence. It submits that the existence of a court order authorizing the searches does not render them lawful, as the sole purpose of these searches and seizures was to suppress the peaceful practice of religion by Jehovah's Witnesses, contrary to the Covenant. The Government does not address this argument in its late reply.

<sup>18</sup> Opinions No. 57/2014, para. 26; No. 8/2020, para. 54; No. 5/2021, para. 43; and No. 6/2021, para. 50; Human Rights Committee, general comment No. 35 (2014) on liberty and security of person, para. 38; and A/HRC/19/57, paras. 48–58.

<sup>19</sup> Human Rights Committee, general comment No. 35 (2014), para. 38.

<sup>20</sup> A/HRC/19/57, paras. 48–58.

<sup>21</sup> *Hill v. Spain*, communication No. 526/1993, para. 12.3.

<sup>22</sup> Mr. Terebilov and Mr. Ivshin appear to not have been placed in pretrial detention, but subjected to travel restrictions. The source also refers to "pretrial detention" when describing post-conviction detention periods, which are not subject to the same human rights considerations as pretrial detention.

132. The Working Group notes the lack of an explanation from the Government for the justification of the searches and seizures. It notes that the Human Rights Committee and the European Court of Human Rights have held, in the context of Jehovah's Witnesses, that such raids, searches and seizures fail to meet the standards of necessity and proportionality.<sup>23</sup> It concludes that a violation of article 17 of the Covenant and article 12 of the Universal Declaration of Human Rights has been shown in this respect, which directly contributed to the apprehension of the 26 individuals and thereby exacerbates the arbitrariness of their detention. The Working Group also notes the source's argument that the collective impact of the violations of their rights constitutes a grave affront to their dignity and reaches the threshold of serious mental suffering, amounting to inhuman or degrading treatment within the meaning of article 7, but considers that the substance of this claim has already been addressed in relation to the specific allegations set out herein without additional information being provided regarding inhuman or degrading treatment.

133. In light of the foregoing, the detention of 26 of the individuals was arbitrary under category I.

**(b) Category II**

134. The Working Group will now consider whether the deprivation of liberty of the 26 individuals was arbitrary under category II. The source submits that the actions of the State constitute a violation of the rights of all 26 individuals under articles 18 (1) and (2), 19 (1) and (2) and 21 of the Covenant. The Government also does not respond to this allegation other than noting that the individuals were mostly charged under Part 1 or 2 of article 282 of the Criminal Code.

135. Article 18 (1) of the Covenant guarantees the right to freedom of thought, conscience and religion, either individually or in community with others and in public or private, and to manifest his or her religion or belief in worship, observance, practice and teaching. The Working Group recalls that freedom of opinion and expression as expressed in article 19 of the Covenant are indispensable conditions for the full development of the person; they are essential for any society and constitute the foundation stone for every free and democratic society.<sup>24</sup> Article 19 (2) of the Covenant protects the holding and expression of opinions, including those that are not in line with government policy.<sup>25</sup> The Human Rights Committee has specifically recognized that article 19 (2) of the Covenant includes the right of individuals to criticize or openly and publicly evaluate their Government without fear of interference or punishment.<sup>26</sup> The Working Group further recalls that the Human Rights Committee, in its general comment No. 37 (2020),<sup>27</sup> has clarified that the protection under article 21 of the Covenant extends to participating in an "assembly" by organizing or taking part in a gathering of persons for a purpose such as expressing oneself, conveying a position on a particular issue or exchanging ideas. Restrictions on any of these rights must be based in law, be done for one of the specific purposes given, be limited to the most proportionate means of achieving the aim behind the restriction and be necessary in a democratic society.

136. The Working Group notes that the material submitted indicates that the 26 individuals were arrested and detained due to their practice of religion as Jehovah's Witnesses, including participation in religious meetings and the sharing of religious literature. The Working Group further notes that it has previously addressed cases concerning the detention of Jehovah's Witnesses, finding that individuals had been deprived of liberty for peacefully exercising the right to freedom of religion and belief, as guaranteed under article 18 of the Universal Declaration of Human Rights and article 18 of the Covenant, and that the freedom to manifest religion "includes the freedom to distribute [publicly] religious texts or publications".<sup>28</sup> Moreover, it has held that characterizing Jehovah's Witnesses' religious activities as

<sup>23</sup> *Mullina et al. v. Uzbekistan*, para. 8.14; and *Taganrog LRO and others v. Russia*, para. 254.

<sup>24</sup> Human Rights Committee, general comment No. 34 (2011), para. 2.

<sup>25</sup> Opinions No. 79/2017, para. 55; and No. 8/2019, para. 55.

<sup>26</sup> *Marques de Morais v. Angola* (CCPR/C/83/D/1128/2002), para. 6.7.

<sup>27</sup> Human Rights Committee, general comment No. 37 (2020) on the right of peaceful assembly, para. 12.

<sup>28</sup> Opinion No. 42/2015, paras. 40-43.

“extremism” was discriminatory and led to arbitrary arrest in the absence of any evidence that those persons had engaged in violence or incited others to violence.<sup>29</sup>

137. Additionally, the Working Group recalls the source’s reference to several provisions of the Criminal Code, including articles 282.2 and 282.3, which have been used to criminalize Jehovah’s Witnesses, especially after they were designated as belonging to an extremist organization following the Supreme Court’s liquidation decision. It also refers to extensive case law from the European Court of Human Rights. In particular, in *Taganrog LRO and Others v. Russia*, which concerned the Russian Supreme Court’s liquidation decision, the Court held that the criminal prosecution of the applicants for the peaceful practice of the Jehovah’s Witnesses’ religion was based on anti-extremism legislation that was impermissibly broad and arbitrarily applied, pursued no legitimate aim and did not meet any pressing social need. The Working Group also notes statements made by the Committee of Ministers of the Council of Europe, Special Rapporteurs and the Organization for Security and Cooperation in Europe expressing concerns about the use of the provisions of the Criminal Code to suppress Jehovah’s Witnesses in the Russian Federation.

138. On the basis of the unrefuted submissions, the Working Group considers that the law’s breadth has been utilized to suppress the Jehovah’s Witnesses for their exercise of their rights. In particular, having reviewed the materials provided by the source, and noting the lack of any substantive engagement by the Government with this material other than repeating the charges against the individuals, the Working Group finds that they were detained due to the exercise of their rights. The Working Group highlights the unrefuted submission that the individuals were all arrested and detained for participating in their religious meetings and disseminating their ideology as Jehovah’s Witnesses. The Government has pointed to no permissible exception to their rights to justify their incarceration. On this basis, the Working Group considers that the detention of the 26 individuals was in violation of articles 18, 19 and 21 of the Covenant and articles 18, 19 and 20 of the Universal Declaration of Human Rights under category II.

**(c) Category III**

139. Given its finding that the 26 individuals’ detention was arbitrary under category II, the Working Group emphasizes that no trials should have taken place. However, from the information provided by the source, the 26 individuals were all charged, and 9 have been convicted, in relation to their activities as Jehovah’s Witnesses.

140. The source has provided no additional arguments beyond those already addressed in categories I and II above, and so the Working Group does not consider it necessary to provide further reasoning in relation to category III.

**(d) Category V**

141. According to the source, the 26 individuals’ detention by the Government is discriminatory based on their religious affiliation, a protected characteristic under the Covenant and the Universal Declaration of Human Rights. The Government has not addressed this argument in its late reply.

142. The Working Group recalls several non-cumulative indicators that serve to establish the discriminatory nature of detention. These include the following: the deprivation of liberty was part of a pattern of persecution against the detained person, including, for example, that other persons with similarly distinguishing characteristics have also been persecuted; or the context suggests that the authorities have detained a person on discriminatory grounds or to prevent them from exercising their human rights.<sup>30</sup>

143. Here, the Working Group has discerned that there is a pattern of discriminatory detention of Jehovah’s Witnesses by the Government, including of the 26 individuals in the present case.<sup>31</sup> The searches, arrests, charges and detention were all aimed at multiple

<sup>29</sup> Opinion No. 11/2019, paras. 74, 76 and 77.

<sup>30</sup> A/HRC/36/37, para. 48.

<sup>31</sup> Opinion No. 11/2019, paras. 74, 76 and 77.

members of this religion, often based on them meeting to worship. No substantiated counter-argument has been provided. On this basis, the Working Group considers that a violation of article 2 of the Universal Declaration of Human Rights and article 26 of the Covenant on the basis of religion has been shown, rendering the detention arbitrary under category V.

**(e) Concluding remarks**

144. The Working Group also notes with concern that this case is one of many concerning the Russian Federation over recent years in which it has found detention to be arbitrary, which may indicate a widespread practice of arbitrary deprivation of liberty in the country.<sup>32</sup> The Working Group also notes its findings under category V in the present case and recent cases in the Russian Federation indicating a pattern of discriminatory arrests and detentions of Jehovah's Witnesses.<sup>33</sup> The Working Group reminds the Russian Federation that States have an obligation not to engage in gross human rights violations, and to prevent and punish them if they are committed.

**3. Disposition**

145. In the light of the foregoing, the Working Group renders the following opinion:

The deprivation of liberty of Valeriy Maletskov, Vladimir Vladimirovich Pushkov, Aysulu Tastaybekova, Yevgeniy Abramov, Yana Abramova, Yevgeniy Leonidovich Dodolin, Tatyana Alekseevna Dodolina, Anton Sergeevich Novopashin, Gonkhi Venans Dzhakhi, Yuriy Ivanovich Pichugin, Andrey Sergeevic Plekhanov, Vladimir Nikolaevich Anufriev, Anastasia Vladimirovna Anufrieva, Andrey Viktorovich Mikholaп, Oksana Sergeevna Mikholaп, Viktor Viktorovich Chernobaev, Alena Stepanovna Chernobaeva, Oleg Vladimirovich Postnikov, Sergey Alexandrovich Naumenko, Andrey Valeryevich Vlasov, Andrey Emikovich Danielyan, Dmitry Sergeevich Terebilov, Anatoly Viktorovich Marunov, Anna Arnoldovna Safronova, Alexander Evgenyevich Ivshin and Boris Ivanovich Andreev, being in contravention of articles 2, 9, 12, 18, 19 and 20 of the Universal Declaration of Human Rights and articles 9, 17, 18, 19, 21 and 26 of the International Covenant on Civil and Political Rights, is arbitrary and falls within categories I, II, and V.

146. The Working Group requests the Government of the Russian Federation to take the steps necessary to remedy the situation of the 26 individuals without delay and bring it into conformity with the relevant international norms, including those set out in the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights.

147. The Working Group considers that, taking into account all the circumstances of the case, the appropriate remedy would be to release the 26 individuals immediately and accord them an enforceable right to compensation and other reparations, in accordance with international law.

148. The Working Group urges the Government to ensure a full and independent investigation of the circumstances surrounding the arbitrary deprivation of liberty of the 26 individuals and to take appropriate measures against those responsible for the violation of their rights.

149. The Working Group requests the Government to disseminate the present opinion through all available means and as widely as possible.

**4. Follow-up procedure**

150. In accordance with paragraph 20 of its methods of work, the Working Group requests the source and the Government to provide it with information on action taken in follow-up to the recommendations made in the present opinion, including:

- (a) Whether the 26 individuals have been released and, if so, on what date;

<sup>32</sup> See, e.g., opinions No. 48/2021, No. 78/2022, No. 75/2023, No. 76/2023, No. 11/2024, No. 33/2025, No. 34/2025 and No. 35/2025.

<sup>33</sup> Opinions No. 11/2019, No. 34/2019 and No. 10/2020.

(b) Whether compensation or other reparations have been made to the 26 individuals;

(c) Whether an investigation has been conducted into the violation of the 26 individuals' rights and, if so, the outcome of the investigation;

(d) Whether any legislative amendments or changes in practice have been made to harmonize the laws and practices of the Russian Federation with its international obligations in line with the present opinion;

(e) Whether any other action has been taken to implement the present opinion.

151. The Government is invited to inform the Working Group of any difficulties it may have encountered in implementing the recommendations made in the present opinion and whether further technical assistance is required, for example through a visit by the Working Group.

152. The Working Group requests the source and the Government to provide the above-mentioned information within six months of the date of transmission of the present opinion. However, the Working Group reserves the right to take its own action in follow-up to the opinion if new concerns in relation to the case are brought to its attention. Such action would enable the Working Group to inform the Human Rights Council of progress made in implementing its recommendations, as well as of any failure to take action.

153. The Working Group recalls that the Human Rights Council has encouraged all States to cooperate with the Working Group and has requested them to take account of its views and, where necessary, to take appropriate steps to remedy the situation of persons arbitrarily deprived of their liberty, and to inform the Working Group of the steps they have taken.<sup>34</sup>

*[Adopted on 30 March 2026]*

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<sup>34</sup> Human Rights Council resolution 60/8, paras. 6 and 9.