



Azerbaijan Popular Parliament

Report

**on the Systematic Practice of Transnational Repression by
the Republic of Azerbaijan**

(Shadow Report)

2026

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1. Executive Summary

The purpose of this report is to systematically document the practice of transnational repression that has developed in the Republic of Azerbaijan over recent decades and has intensified in recent years, to analyse its legal and institutional characteristics, and to assess the risks that this activity creates for the system of human rights protection within the Council of Europe area.

The phenomenon of transnational repression has been widely documented internationally and has been assessed by a number of authoritative international organisations as a systemic threat accompanied by the abuse of mechanisms of interstate legal cooperation.¹

At the same time, the report aims to provide the Parliamentary Assembly of the Council of Europe and member States with a normative and institutional basis for shaping a more effective and coordinated response to this phenomenon.

The analysis demonstrates that, in the Azerbaijani context, transnational repression is not a random set of isolated cases. Rather, it is a systemic and multi-layered policy that functions as the projection of the State's political-control mechanisms beyond national borders. Under this policy, journalists, political activists, human rights defenders, and exile communities living abroad are subjected to various forms of pressure.²

The report shows that this policy is implemented both through bilateral political-cooperation channels and through international legal mechanisms. In particular, within the framework of relations with Turkey, the accelerated and non-transparent application of deportation and extradition procedures has been observed. In other countries, similar outcomes are sought through Interpol mechanisms, extradition requests, and administrative detention. This demonstrates that transnational repression is carried out through both political and institutional channels.

The main findings of the report may be summarised as follows:

- The Azerbaijani authorities apply transnational repression not as episodic measures, but as an institutionalised and continuous State policy.
- Physical intervention, legal persecution, digital surveillance, and indirect-pressure mechanisms are used in parallel against critics living abroad, which demonstrates the multi-layered and coordinated character of the repression.
- Deportation and extradition procedures, as well as Interpol mechanisms, are instrumentalised for political purposes, thereby undermining the neutrality and reliability of systems of international legal cooperation.

¹ Freedom House, *Transnational Repression Reports Archive*, <https://freedomhouse.org/report/transnational-repression/reports-archive>

Human Rights Watch, *World Report – Azerbaijan*, <https://www.hrw.org/world-report/2024/country-chapters/azerbaijan>

Amnesty International, *Azerbaijan 2024*, <https://www.amnesty.org/en/location/europe-and-central-asia/azerbaijan/report-azerbaijan/>

² Freedom House, *Defending Democracy in Exile: Policy Responses to Transnational Repression*, <https://freedomhouse.org/event/defending-democracy-exile-policy-responses-transnational-repression>

- Within this practice, unlawful return, including violations of the principle of non-refoulement, the weakening of fair-trial safeguards, and politically motivated criminal prosecution are observed.
- Transnational repression is not limited to legal and administrative pressure. In some cases, it creates risks to the physical safety of individuals and may be accompanied by suspicious deaths.
- This practice is not limited to individual human rights violations; it also poses a systemic threat to freedom of expression, legal certainty, and the principle that States must comply with their international obligations within the Council of Europe area.

Based on the report's conclusions, the following principal recommendations are advanced:

- The Council of Europe should recognise transnational repression as a distinct problem area and establish special monitoring and accountability mechanisms in this field.
- Member States should apply a unified and principled legal approach to politically motivated extradition and deportation requests, with particular attention to the protection of persons at risk.
- Within the framework of international police cooperation, including the Interpol system, additional filters and oversight mechanisms should be strengthened in order to prevent political abuse.
- Concrete calls should be addressed to the Republic of Azerbaijan to comply with its international legal obligations, end criminal prosecutions in absentia, and discontinue the practice of politically motivated persecution.

Accordingly, this report assesses transnational repression not only as a national-level human rights problem, but also as a systemic challenge to the integrity of the European legal space and to the legitimacy of the international legal order, and it substantiates the necessity of a collective response in this field.

2. Methodology and Sources

This report has been prepared on the basis of a qualitative legal and political analysis methodology and is aimed at revealing the systemic character of transnational repression cases. The purpose of the research is not only to describe individual facts, but also to assess them within the broader policy context and to identify structural links between them.

Various categories of sources were used in preparing the report. These include reports and materials of international human rights organisations, including Human Rights Watch, Freedom House, and Amnesty International; international and national court decisions, in particular the case law of the European Court of Human Rights; open-source journalistic investigations; and legal and analytical research materials. These sources were cross-checked, and preference was given, as far as possible, to verified facts.

Several key criteria guided the selection and systematisation of the facts. First, an assessment was made of whether a concrete incident contained an element of politically motivated

persecution. In addition, attention was paid to whether State bodies were directly or indirectly involved in the incident, whether the activity had a cross-border character, and whether it was open to legal assessment under international legal norms. This approach allows the report to identify not random and isolated incidents, but a systemic trend.

From a methodological perspective, the report relies on approaches accepted in international practice for classifying the forms of transnational repression,³ and, in particular, takes account of models based on empirical evidence.⁴ This makes it possible to assess different incidents within a single analytical framework and to identify their interconnections.

At the same time, certain limitations existed during the research process. The limited availability of independent information sources within Azerbaijan, the low level of transparency of State bodies, and the reluctance of persecuted persons to share information for security reasons made it difficult in some cases to document facts fully. In addition, where information on certain incidents was available only through indirect sources, further verification was required.

Despite these limitations, the methodology and source base used in this report make it possible to ensure the reliability of the conclusions presented and demonstrate that the facts reflected in the report are not accidental, but form part of an identifiable and analysable systemic practice.

3. Structural Features of the Political Regime in Azerbaijan and the Context in which Transnational Repression Has Emerged

The current political system in the Republic of Azerbaijan is characterised by long-term concentration of power and the weakness of institutional checks and balances. The executive branch functions as the main centre of State governance, while real political competition and effective parliamentary oversight are practically absent from the decision-making process. Under these conditions, the functional division envisaged between the different branches of government is largely formal in practice.⁵

Although the judiciary is structurally designed as an independent institution, its dependence on the executive branch in practice is widely noted.⁶ Serious questions exist, especially in politically sensitive cases, regarding the impartiality of judicial decisions and their compliance with the principles of a fair trial. This weakens the effectiveness of legal-protection

³ Freedom House, *Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression*, https://freedomhouse.org/sites/default/files/2021-02/Complete_FH_TransnationalRepressionReport2021_rev020221.pdf

⁴ Freedom House, *Defending Democracy in Exile: Policy Response to Transnational Repression*, https://freedomhouse.org/sites/default/files/2022-05/Complete_TransnationalRepressionReport2022_NEW_0.pdf

⁵ Freedom House, *Freedom in the World 2025: Azerbaijan*, <https://freedomhouse.org/country/azerbaijan/freedom-world/2025>

⁶ Human Rights Watch, *Azerbaijan: Events of 2024* <https://www.hrw.org/world-report/2025/country-chapters/azerbaijan>

mechanisms and increases the possibility of legitimising political persecution through legal procedures.

The media environment operates within similarly restrictive parameters. Administrative, legal, and economic tools of pressure are widely used against independent journalism, with the result that a significant part of critical media resources either cease operating or are forced to continue their activities from outside the country.⁷ This leads to a reduction of pluralism in the information environment and weakens opportunities for public oversight.

Under these structural conditions, the institutional activity of the political opposition is restricted, independent initiatives of civil society are narrowed, and mechanisms of direct and indirect control over public and political activity are strengthened. As a result, the limited opportunities for safe and free activity inside the country for persons holding critical views lead to an increase in political emigration.⁸

It is precisely in this context that the phenomenon of transnational repression emerges. The mechanisms of control and pressure applied inside the State are not limited to national borders; instead, they are directed at exile communities and individuals active abroad. In this respect, transnational repression should be understood as a logical continuation of the internal features of Azerbaijan's political regime and as their projection beyond the country's borders.

4. The Systemic Nature of Transnational Repression in the Republic of Azerbaijan

The analysis shows that transnational repression in the Azerbaijani context cannot be assessed as a random collection of separate incidents. On the contrary, the existing facts provide grounds to conclude that this activity is a consistent, coordinated, and purposeful State policy.

The observed cases possess a certain logic and continuity in terms of time, place, and the means used. The use of similar methods in different countries, the selection of the same types of target groups, and the parallel deployment of various instruments indicate that this activity is not spontaneous but planned and institutionalised.

One of the most notable characteristics in this context is the multi-layered structure of transnational repression. On the one hand, State bodies activate legal mechanisms, including criminal cases in absentia, extradition requests, and international search procedures; on the other hand, informal and indirect means, such as physical pressure, digital surveillance, and pressure on family members, are applied in parallel. This demonstrates the existence of a unified strategic approach.

At the same time, the continuity of transnational repression confirms its long-term character. Incidents recorded in different years and in different political contexts show that this practice

⁷ Reporters Without Borders, *2024 World Press Freedom Index: Azerbaijan*, <https://rsf.org/en/country/azerbaijan>

⁸ Abzas.info, "Human Rights Watch" illik hesabatını yayımladı: "Azərbaycanda narahatedici insan haqları pozuntuları davam edir", <https://abzas.info/en/2024/1/human-rights-watch-dunya-hesba16aa52-0/>

does not consist of situational reactions, but rather represents a stable policy line aimed at keeping critical activity against the authorities under control regardless of geography.

One important fact showing that this policy is legitimised not only in practice but also at the ideological level is the public statements of political figures close to the authorities. Zahid Oruj should be specifically mentioned in this context. In addition to being a member of the Milli Majlis of the Republic of Azerbaijan, he has for many years played an active role in public-political discourse as a political figure close to the authorities. He has also participated several times in presidential elections as a formal opponent, expressed positions consistent with the authorities' political line, and held leading positions in public-political initiatives formed by the State. From this perspective, his statements may be assessed not as individual opinions, but rather as an articulation of the authorities' ideological approach. The ideas expressed by him, in which persons living abroad and criticising the authorities are presented as "legitimate targets" and the possibility of their "neutralisation" is emphasised, show that transnational repression is justified not only through covert mechanisms but also through open political discourse.⁹ Such statements normatively reinforce the State's actual practice and form an ideological basis for legitimising violent or unlawful measures.

The main purpose of this policy is not merely to silence specific individuals. In a broader sense, the objective is to create an atmosphere of fear among Azerbaijani-origin exile communities abroad, to generate self-censorship, and to weaken collective political activity. Thus, transnational repression functions not only as a means of legal or physical persecution, but also as an instrument of psychological and social influence.

Consequently, a systemic analysis of the existing facts provides grounds to conclude that transnational repression in the Republic of Azerbaijan is not the result of isolated structural violations, but an integral component of the State's political-control strategy. This makes it necessary to assess it not only at the level of individual human rights violations, but also within a broader institutional and international legal context.

5. Forms and Facts of Transnational Repression

In contemporary human rights discourse, transnational repression is understood as a complex phenomenon encompassing the multi-faceted pressure mechanisms that States use against critics living beyond their borders.¹⁰ Its defining feature is the parallel use of various legal and extra-legal instruments and the fact that it reflects a systemic behavioural model rather than merely individual cases.¹¹

⁹ Meydan.TV, *Zahid Oruc: "Prezidenti təhqir edənlər legitim hədəflər kimi hər cür zərərsizləşdirilməlidir"*, <https://www.meydan.tv/az/article/zahid-oruc-prezidenti-tehqir-edenler-legitim-hedefler-kimi-her-cur-zerersizlesdirilmelidir/>

¹⁰ Adamson & Han, *Diasporic geopolitics and differentiated policies of transnational repression*, <https://doi.org/10.1080/01419870.2026.2624626>

¹¹ Dukalskis et al., *Transnational repression: data advances, comparisons, and challenges*, <https://doi.org/10.1080/2474736X.2022.2104651>

The analysis presented in this report is based on approaches widely used in international practice, especially the classification of transnational repression developed by Freedom House.¹² That classification makes it possible to group transnational repression by tactics and instruments and provides an effective analytical framework for systematically analysing States' conduct in this field.

In accordance with this methodological approach, the report presents the main forms of transnational repression in the Republic of Azerbaijan under six categories: 1) physical intervention and abduction; 2) deportation and extradition; 3) legal persecution and convictions in absentia; 4) digital surveillance; 5) indirect pressure against family members; and 6) physical attacks and killings abroad.¹³

The analysis below is presented on the basis of concrete facts and examples relating to each of these categories.

5.1. Physical Abduction and Violence

One of the harshest and most overt forms of transnational repression is the forced detention, abduction, kidnapping, and transfer to Azerbaijani territory of persons living abroad against their will. Such cases should be assessed not only as individual human rights violations, but also as interference in the jurisdiction of other States and violations of fundamental principles of international law.

5.1.1. The Case of Afgan Mukhtarli

Afgan Mukhtarli, born in 1979, was an Azerbaijani independent journalist and media activist known for corruption investigations. He wrote articles in Azerbaijan drawing public attention to high-level corruption, the activities of power structures, and human rights violations. According to various sources, his work was perceived by the Azerbaijani authorities as critical and threatening. Due to increasing pressure from the authorities and security risks, Mukhtarli moved to Georgia in 2015 and continued his work in Tbilisi.

On 29 May 2017, Mukhtarli disappeared under suspicious circumstances near his home in Tbilisi, and several hours later it became known that he was in the custody of Azerbaijani law-enforcement bodies.¹⁴ Official explanations regarding how the Georgian police and other State bodies were involved in the operation were limited and non-transparent. Mukhtarli himself alleged that he had been forcibly detained, blindfolded, driven across the border by car, and

¹² Freedom House, *Transnational Repression: Understanding and Responding to Global Authoritarian Reach*, <https://freedomhouse.org/report/transnational-repression>

¹³ Atakhan Abilov, *Transnational Repression and International Law: An Analysis of the Azerbaijani Experience*, <https://bakuresearchinstitute.org/en/transnational-repression-and-international-law-an-analysis-of-the-azerbaijani-experience/>

¹⁴ Amnesty International, *Georgia/Azerbaijan: Exiled Azerbaijani journalist at risk of torture after cross-border abduction*, <https://www.amnesty.org/en/latest/news/2017/05/georgia-azerbaijan-exiled-azerbaijani-journalist-at-risk-of-torture-2/>

unlawfully brought into Azerbaijani territory. The incident raised serious questions concerning Georgia's territorial and law-enforcement jurisdiction.¹⁵

Mukhtarli's detention and subsequent trial became the subject of broad discussion among international law and human rights organisations, including in the European Parliament. In June 2017, the European Parliament adopted a relevant resolution expressing deep concern over Mukhtarli's disappearance, forcible transfer, and arrest; calling on the Georgian authorities to conduct a full, transparent, and effective investigation; and demanding that the Azerbaijani authorities fully release the journalist and ensure all of his fundamental rights.¹⁶

The European Court of Human Rights also delivered a judgment in the Mukhtarli case on 5 September 2024.¹⁷ The Court found that both Georgia and Azerbaijan had violated several provisions of the Convention. Georgia was found responsible for violating the right to liberty and security under Article 5 of the Convention in connection with the alleged forcible transfer and the failure to investigate it effectively. Azerbaijan was found to have violated its obligations under Articles 5(3) and 8 of the Convention in relation to Mukhtarli's detention, the examination of his telephone without a court order, and other procedural violations. Both States were ordered to pay compensation determined by the Court.

The Afghan Mukhtarli case is one of the clearest and most severe examples of transnational repression. This incident is not only an individual human rights violation but also an interference with the territorial sovereignty of another State. In this case, legal procedures were replaced by violent actions, and international human rights standards were seriously violated. In this respect, the Mukhtarli case constitutes a central evidentiary example of the model of transnational repression examined in this report.

5.1.2. The Case of Elvin Isayev

Elvin Isayev was an Azerbaijani blogger, public activist, and social-media critic. On social networks and online platforms, he sharply criticised corruption and the human rights policies of the Azerbaijani authorities, and in particular described the head of State as a "dictator." Isayev had lived and worked in the Russian Federation since 1998.

In September 2019, a Russian court decided to strip Elvin Isayev of Russian citizenship, and his imminent deportation to Azerbaijan was expected.¹⁸ This process raised suspicions that Russia and Azerbaijan were cooperating in the mutual pursuit of undesirable persons.

At that time, however, the European Court of Human Rights, under Rule 39 of its Rules of Court, issued a decision prohibiting Elvin Isayev's deportation from the Russian Federation to

¹⁵ Institute for War and Peace Reporting, *Azerbaijan: IWPR Journalist "Abducted"*
<https://iwpr.net/global-voices/azerbaijan-iwpr-journalist-abducted>

¹⁶ European Parliament, *Resolution of 15 June 2017 on the case of Afgan Mukhtarli and the situation in Azerbaijan (2017/2722(RSP))*, https://www.europarl.europa.eu/doceo/document/TA-8-2017-06-15_EN.html

¹⁷ Hudoc.echr.coe.int, *CASE OF MUKHTARLI v. AZERBAIJAN AND GEORGIA*
<https://hudoc.echr.coe.int/eng/?i=001-235491>

¹⁸ Reuters, *Russia strips Azeri blogger of citizenship and moves to deport him, 30 August 2019*
<https://www.reuters.com/article/world/russia-strips-azeri-blogger-of-citizenship-and-moves-to-deport-him-idUSKCN1VK29S/>

Azerbaijan. The decision was adopted in view of the serious risk to the individual and concerns relating to freedom of expression. After that decision, Isayev left Russia for Ukraine. According to Ukrainian media reports, he suddenly “disappeared” in Kyiv on 12 December 2019. A few days later, on 16 December, Amnesty International stated that Isayev had been unlawfully deported from Ukraine and brought to Azerbaijan, which resulted in a violation of the relevant ECtHR decision. In its official statement, the organisation emphasised that the measure applied against the blogger had the character of a politically motivated forcible removal rather than a legal procedure.¹⁹

Amnesty International stated that Isayev’s deportation took place shortly before Ukrainian President Volodymyr Zelenskyy’s planned visit, suggesting its non-transparent and politically motivated character. The statement also noted that the Ukrainian authorities’ disregard of the ECtHR interim measure was contrary to the human rights system, since a person at risk of torture and ill-treatment must not be forcibly returned.²⁰

The Azerbaijani government did not officially disclose the specific criminal provision under which the investigation against Isayev was being conducted. At the same time, experts noted that a court in Azerbaijan had ordered pre-trial detention against Isayev on 22 August 2019, and the existence of that decision should have affected any extradition or deportation procedure. However, it has not been clearly established whether an official Interpol request existed.

The Elvin Isayev case raises several issues under international law:

- The ECtHR’s decision prohibiting deportation from Russia to Azerbaijan documented that Isayev was at risk of politically motivated persecution, that legal mechanisms were being abused, and that ensuring the individual’s security was necessary.
- His forcible removal from Ukraine is assessed as a violation of the ECtHR decision in question, and it also creates the risk of violating the principle of respect by States for international court decisions.
- The non-implementation of the ECtHR decision and the carrying out of the deportation raise serious concerns regarding the individual’s right to liberty and security, as well as the principle of non-refoulement.

This incident is one of the most extensively documented facts showing that transnational repression is carried out through the misuse of legal mechanisms, and it raises serious concerns under international law.

¹⁹ Khpg.org, *Azerbaijan opposition blogger illegally deported from Ukraine despite ECHR ruling*, <https://khpg.org/en/1576451055>

²⁰ Amnesty International, *Azerbaijan authorities must release Talysh activists (including Elvin Isayev)*, <https://www.amnesty.org/en/wp-content/uploads/2021/05/EUR5524922020ENGLISH.pdf>

5.1.3. The Case of Zahiraddin Ibrahimov

Zahiraddin Ibrahimov, born in 1954, was a Talysh historian and activist. In 1997, he moved to Yekaterinburg, Russia, where he engaged in activities relating to ethnic Talysh culture, history, and rights.

In 2002, Ibrahimov acquired citizenship of the Russian Federation. In 2007, he formally renounced Azerbaijani citizenship and lived solely with a Russian passport. In 2014, during an attempt to visit Azerbaijan, he was detained at Lankaran airport as an “undesirable person” and sent back to Russia.

The most dramatic event in this case occurred in March 2025. On the morning of 26 March 2025, while going to work in Yekaterinburg, Ibrahimov suddenly disappeared, and contact with him was lost 15 minutes after he left home. The first official information about his fate was provided to his relatives on 11 April. In a letter from the State Security Service of Azerbaijan (SSS), it was stated that Ibrahimov had been detained on charges of “high treason,” separatism, and other serious offences.²¹

It soon became clear that Ibrahimov had been physically transferred from the Russian city of Yekaterinburg to Azerbaijani territory, and that this process had been carried out not within the framework of an ordinary extradition procedure, but as a non-public “special operation.” According to Ibrahimov’s relatives, at the same time as his disappearance, a letter addressed by the SSS to his native village had been prepared, creating the impression that the “operation had been planned in advance.”

The details of Ibrahimov’s transfer to Baku have still not been officially disclosed. As a Russian citizen, his transfer to Azerbaijan would not be possible under Russian law. The Russian Ministry of Foreign Affairs therefore stated that Ibrahimov had previously been deprived of Russian citizenship for unlawful acts, was considered an Azerbaijani citizen, and was transferred to Azerbaijan on that basis.²²

In the media, Ibrahimov was presented as a person “acting against Azerbaijan and connected with Armenian structures,” and it was alleged that between 2005 and 2020 he had spoken against Azerbaijan at conferences held in Yerevan.²³

Within the criminal case initiated by the SSS of the Republic of Azerbaijan, Ibrahimov was charged with high treason, public calls against the State made by foreign structures, and incitement of ethnic hatred and hostility.²⁴

²¹ Human Rights Watch, Azerbaijan Expands Crackdown on Activists in Exile, <https://www.hrw.org/news/2026/02/10/azerbaijan-expands-crackdown-on-activists-in-exile>

²² Eanews.ru, *МИД РФ объяснил ситуацию с «похищением» из Екатеринбурга азербайджанского оппозиционера*, <https://eanews.ru/mir/20250703095222/mid-rf-ob-yasnil-situatsiyu-s-pohischiem-iz-ekaterinburga-azerbaydzhanskogo-oppozitsionera>

²³ Abzas.info, *DTX Rusiya vətəndaşı olan talış tarixçisini Azərbaycanla xəyanətdə ittiham edir*, <https://abzas.info/az/2025/4/dtx-rusiya-vtndas-olan-tal06e508fa-e/>

²⁴ Sitat.info, *Zahirəddin İbrahimovun həbs müddəti uzadıldı*, <https://sitat.info/news/66507/zahireddin-ibrahimovun-hebs-muddeti-uzadildi>

This incident raises serious concerns in the context of transnational repression within the Council of Europe area. Ibrahimov, who had lived for a long time as a Russian citizen, was physically abducted and brought from Russia to Azerbaijan in a manner that cannot be explained by ordinary extradition procedures. The charges against him, including high treason and ethnic hatred, are seriously disputed by independent human rights defenders, who note that such charges are usually linked to political activity.

The Ibrahimov incident should be assessed as a violation of the right to personal liberty and security, of interstate legal-cooperation procedures, and of the principle of respect for the jurisdiction of other States. The transfer of a long-term Russian citizen living abroad to the detention facility of the SSS without legal procedures and in a non-transparent manner is not consistent with international legal norms and is significant as an example of the actual practice of transnational repression.

5.2. Deportation and Extradition

One of the recurring forms of transnational repression with a legal appearance is the abuse of deportation and extradition mechanisms for political purposes. In international law, including under the European Convention on Human Rights and the 1951 UN Convention relating to the Status of Refugees, deportation and extradition procedures are regulated by specific legal safeguards and are ordinarily subject to strict legal oversight. Despite these safeguards, in some cases States use these procedures as tools for “neutralising” political opponents.

Politically motivated extradition and deportation cases may be implemented through two principal mechanisms:

- the abuse of national migration legislation and administrative procedures;
- the use of Interpol mechanisms for political purposes and the application of politically motivated “red notices.”

Below, the use of these forms in the context of transnational repression is first summarised on the basis of a systemic regional practice, namely the Turkish example. It is then expanded through analogous cases observed in other countries, and finally concrete individual cases, including the cases of Fakhraddin Abbasov and Fikrat Huseynli, are analysed in terms of facts, context, and legal assessment.

5.2.1. Abuse of Deportation and Extradition Mechanisms from the Republic of Turkey to the Republic of Azerbaijan

Within the special political relationship that has developed between the Republic of Turkey and the Republic of Azerbaijan, the formal character of legal procedures and their practical orientation toward the execution of political orders raise serious concerns. The available facts indicate that, at the request of the Azerbaijani authorities, a number of persons were handed over to Azerbaijan on Turkish territory without the necessary legal guarantees, including a fair judicial review and an assessment of political motives.

This practice has manifested itself particularly clearly in relation to the following persons who have been subjected to politically motivated persecution:

Rauf Mirgadirov worked as a journalist and was an accredited media representative in Turkey. After he took positions in his journalistic work that conflicted with the interests of the Azerbaijani authorities, he was detained in Turkey at Baku's request and quickly handed over to Azerbaijan.²⁵ He was subsequently imprisoned in Azerbaijan and emigrated to Europe after completing his sentence.

Huseyn Abdullayev is a former member of parliament who had obtained political asylum in Germany. During a trip to Turkey, he was detained even while on board an aircraft and was extradited to Azerbaijan. He is currently held in detention in Azerbaijan. This case may be assessed as a grave violation of international law, in particular of principles relating to the protection of refugees.²⁶

Fazil Gasimov is known as an academic researcher. Within the framework of a criminal case considered political in nature in Azerbaijan, and linked to economist Gubad Ibadoghlu, he was detained in Turkey and handed over to Azerbaijan. He is currently in detention.²⁷

Gültekin Hacibeyli is a former member of parliament and a public figure known for ultra-right political views. While living in Turkey with a temporary residence permit, she was detained and deported at the request of the Azerbaijani side.²⁸ There is insufficient information indicating that this process was conducted in accordance with transparent legal procedures.

Kamal Isayev is an ethnic Talysh citizen of the Russian Federation. During a private trip to Turkey, he was detained at the border-control stage and handed over to the Azerbaijani side. Information regarding the legal basis and transparency of the procedure remains unclear. He is reported to be held at the detention facility of the State Security Service of Azerbaijan.²⁹

These cases show that, within the framework of cooperation between Turkey and Azerbaijan, the extradition mechanism is sometimes used as a political tool rather than as a legal procedure. This is contrary both to fundamental principles of international law, including the principle of non-refoulement, and to obligations concerning the protection of human rights.

²⁵ Hrw.org, *Turkey/Azerbaijan: Journalist Deported, Imprisoned Baku Should Free Reporter; Ankara Should Investigate Expulsion*, https://www.hrw.org/news/2014/04/24/turkey/azerbaijan-journalist-deported-imprisoned?utm_source=chatgpt.com

²⁶ Ohchr.org, *Azerbaijan: UN experts urge release of ailing Government critic Huseyn Abdullayev*, <https://www.ohchr.org/en/press-releases/2021/04/azerbaijan-un-experts-urge-release-ailing-government-critic-huseyn>

²⁷ Rferl.org, *Azerbaijani Economist Detained in Turkey, Handed to Baku*, <https://www.rferl.org/a/azerbaijan-economist-detained-turkey/32539156.html>

²⁸ Azxeber.com, *Gültekin Hacibəyli Azərbaycanca deportasiya edildi*, <https://azxeber.com/az/gultekin-hacibeyli-azerbaycana-deportasiya-edildi/sosial/>

²⁹ Meydan.TV, *Talış fəal Türkiyədə saxlanılaraq Azərbaycana gətirilib*, <https://www.meydan.tv/az/article/talis-f9%C9%99al-turkiy%C9%99d%C9%99-saxlanilaraq-az%C9%99rbyaycana-g%C9%99tirilib/>

5.2.2. Attempts to Use Extradition and Detention Mechanisms in Other Countries

The Azerbaijani authorities' policy of transnational repression is not limited to Turkey; similar cases have also been observed in other countries.

Elkhan Nuriyev, as a Ukrainian citizen, was detained through Interpol when entering Poland from Ukraine. After several months of detention, he was released as a result of the intervention of international human rights organisations.³⁰ This incident raises the issue of possible misuse of Interpol mechanisms.

Dashgin Agalarli, who had obtained political asylum in a European country, was detained by the police in Poland through Interpol at Azerbaijan's request when he entered Poland. However, as a result of the efforts of human rights organisations, he was not extradited and was released.³¹

Alovsat Aliyev was detained in Ukraine despite holding political-asylum status in the European Union. He was arrested in Kyiv on the basis of requests submitted by the Azerbaijani authorities through Interpol and was held for a certain period. It was reported that the Ukrainian side took steps toward his extradition. However, as a result of the intervention of lawyers and international human rights defenders, the extradition did not take place, and he was later able to return to the European country where he had been granted political asylum. This case shows that even persons with international protection status are not fully insulated from the risk of transnational repression.³²

Zulfuqar Mikayilzade was detained in Russia at the request of the Azerbaijani side. He is considered to be among those who have been subjected to pressure in Azerbaijan because of their religious views. During his detention, the possibility of his extradition to Azerbaijan was real; however, as a result of lawyers' intervention, the process was halted, and he was released after a certain period.³³ This incident shows that transnational repression is not limited to political activists, but also encompasses persons who hold different religious and ideological positions.

Afgan Sadigov was detained in Tbilisi, the capital of Georgia, at the request of the Azerbaijani side. His release was also made possible by the activation of international human rights mechanisms.³⁴ Later, however, the Tbilisi City Court found Sadigov to have violated Article 173 of Georgia's Code of Administrative Offences, concerning insulting a police officer on

³⁰ Jam-news.net, *Keçmiş azərbaycanlı məmur Polşada "Putinin sifarişilə" saxlanılıb?* <https://jam-news.net/az/kecmis-az%C9%99rbaycanli-m%C9%99mur-polsada-putinin-sifarisil%C9%99-saxlanilib/>

³¹ Bbc.com, *Azərbaycanlı fəal Daşqın Ağalarlı Polşada saxlanılıb*, <https://www.bbc.com/azeri/azerbaijan-51012958>

³² En.odfoundation.eu, *They've come for you. Misuse of extradition procedures, unlawful expulsions and kidnappings of victims of politically motivated prosecution*, <https://en.odfoundation.eu/content/uploads/i/fmfiles/raporty/25-02-2019-odf-report-unlawful-extraditions-eng-1.pdf>

³³ Globalinfo.az, *Hacı Zülfüqar Mikayilzadə Rusiyada həbs edildi*, <https://globalinfo.az/haci-zulfuqar-mikayilzade-rusiyada-hebs-edildi/>

³⁴ Pravda.az, *Əfqan Sadıqov Gürcüstanda saxlanıldı*, <https://pravda.az/news/156869>

social media, and he was deported to Azerbaijan on 5 April 2026, shortly before the official visit of President Ilham Aliyev of the Republic of Azerbaijan to Georgia.³⁵

Maqsud Mahmudov was detained in Ukraine and brought to Azerbaijan. According to a joint statement of the Prosecutor General's Office and the Ministry of Internal Affairs of the Republic of Azerbaijan, Maqsud Soltan oglu Mahmudov had been placed on the international wanted list on 10 January 2020 under Article 178.3.2 of the Criminal Code, concerning large-scale fraud, and was detained in the territory of Ukraine in July 2021. In Azerbaijan, Mahmudov had presented himself at opposition-organised rallies as a defender of the authorities. In 2019, after leaving Azerbaijan, he apologised for those actions and stated that he had acted under coercion. After he was placed on the international wanted list, Mahmudov issued a statement assessing this as retaliation for his remorse and apology for his previous actions.³⁶

These facts show that, in implementing its policy of transnational repression, the Azerbaijani authorities seek to use not only bilateral relations, but also international legal mechanisms in a selective and targeted manner.

5.2.3. The Case of Fakhraddin Abbasov

Fakhraddin Abbasov, also referred to in some sources as Aboszoda, was a Talysh national activist, scholar, and political critic. In 1993, he engaged in political activity in Azerbaijan's Talysh region and, as a result, faced issues of liability within certain legal procedures by Azerbaijani law-enforcement bodies. In 1994, he left the country and sought refuge in Russia. In Russia, he spent many years engaged in scholarly and public activity concerning Talysh culture, language, and rights, and advocated for the rights of the national minority through various media outlets.

In 2014, he obtained a temporary residence permit under Russian migration legislation and later applied to live and work in the country on a long-term basis. In July 2018, however, a criminal case was initiated against him in Baku by decision of the Sabail District Court, and an arrest order was issued. The charges in the case reportedly included calls against the State, incitement of national hatred and hostility, and other serious offences.

In autumn 2018, the Azerbaijani authorities sent an official request to the Russian Federation for Abbasov's extradition, which led to his detention in Russia. He spent five months in custody awaiting the extradition procedure. However, in early 2019 the Lyubertsy court decided that Abbasov should be deported because his residence permit under Russian migration legislation had expired. This decision was implemented through a deportation mechanism rather than through a formal extradition procedure.³⁷

³⁵ Qafqazinfo.az, *Əfqan Sadiqov Azərbaycan deportasiya olundu*, <https://qafqazinfo.az/news/detail/efqan-sadiqov-azerbaycana-deportasiya-olundu-yenilenib-504265>

³⁶ Amerikaninsesi.org, *Maqsud Mahmudov Ukraynada tutularaq Azərbaycan gətirilib*, <https://www.amerikaninsesi.org/a/maqsud-mahmudov-ukraynada-tutularaq-az%C9%99rbyaycana-g%C9%99tirilib/6234054.html>

³⁷ Regnum.ru, *Жизнь и смерть Фахрэддина Абосзода*, <https://regnum.ru/news/3162464>

On 28 February 2019, Fakhraddin Abbasov was deported from the Russian Federation and immediately detained by officers of the State Security Service of Azerbaijan at Baku International Airport.³⁸ After his detention, Azerbaijani law-enforcement bodies brought charges against Abbasov, in particular on the basis of provisions concerning calls against the State and incitement of national hatred.³⁹

Abbasov's trial was held at the Baku Court of Grave Crimes in February 2020, and he was convicted under provisions of the Criminal Code of the Republic of Azerbaijan concerning calls directed against the State and acts creating national and ethnic hostility. He was sentenced to a lengthy term of imprisonment.

His death was recorded in Gobustan prison in November 2020. Official information stated that Abbasov had committed suicide,⁴⁰ but human rights organisations and his relatives expressed doubts about this version, emphasising that the death occurred under suspicious circumstances and that no conclusive and transparent investigation into these circumstances had been conducted. Human rights defenders assessed Abbasov's situation as "a death resulting from politically motivated conviction and coercive procedure" and expressed international concern regarding the matter.

The case of Fakhraddin Abbasov should be assessed as an example of transnational repression. The deportation mechanism used instead of the extradition procedure brought against him targeted his political activity. The justification of the deportation decision by reference to Russian migration law, his surrender despite the non-fulfilment of the extradition request, and his subsequent prosecution in Azerbaijan on politically sensitive charges are considered contrary to international legal norms, including the principles prohibiting unlawful deportation and forcible removal. In this respect, Abbasov's case is a clear example of legal procedures being used as a political instrument.

5.2.4. The Case of Fikrat Huseynli

Fikrat Huseynli was an Azerbaijani journalist and media representative active in exile. In 2006, while working for the well-known independent newspaper *Azadliq* in Baku, he was subjected to violence by informal forces. Huseynli was forced to leave Azerbaijan and obtained political asylum in the Kingdom of the Netherlands in 2008. As a result, he acquired residence and citizenship rights in the Netherlands and conducted media activities connected to exile and diaspora communities.

In October 2017, Huseynli was detained by Ukrainian law-enforcement bodies at Boryspil International Airport in Kyiv, Ukraine.⁴¹ The detention was carried out on the basis of a "red

³⁸ Amnesty.org, *Amnesty требует расследования исчезновения Фахраддина Аббасова из подмосковного СИЗО*, <https://amnesty.org.ru/r/2019-02-28-aboszoda/>

³⁹ İkisahil.az, *Fəxrəddin Abbasov kimi Vətən xainlərinin həbsini siyasiləşdirmək əbəsdir*, <https://ikisahil.az/post/fexreddin-abbasov-kimi-veten-xainlerinin-hebsini-siyasileshdirmek-ebesdir>

⁴⁰ Bakupost.az, *Fəxrəddin Abbasov həbsxanada intihar etdi*, <https://www.bakupost.az/fexreddin-abbasov-hebsxanada-intihar-etdi>

⁴¹ Freedom House, *Ukraine Should Release Journalist Detained Due to Azerbaijan's Misuse of Interpol*, <https://freedomhouse.org/article/ukraine-should-release-journalist-detained-due-azerbajjans-misuse-interpol>

notice” indicator issued through Interpol by the Azerbaijani authorities. It was reported that the Azerbaijani side justified the Interpol search for Huseynli on the basis of Criminal Code provisions concerning “illegal crossing of the State border” and “fraud,” although these charges had been brought while Huseynli was living in the Netherlands and held citizenship rights there.⁴²

In October 2017, a Ukrainian court issued a decision concerning Huseynli’s detention, but that decision caused serious humanitarian and legal concerns. International human rights organisations, including Freedom House and Reporters Without Borders, assessed Huseynli’s detention as a politically motivated use of the Interpol system by the Azerbaijani authorities. Freedom House in particular called on Ukraine to “release Huseynli,” noting that “the charges stated in the Azerbaijani government’s Interpol request appear to be more a tool of political pressure against the journalist than genuine criminal liability.”⁴³

In such cases, international law experts and media-freedom organisations have emphasised that the abuse of the Interpol “red notice” mechanism removes that structure from its legitimate function.

The Fikrat Huseynli case may be assessed as an example of transnational repression implemented through Interpol mechanisms. The main function of the Interpol system is to ensure international legal and police cooperation. The arrest of dissidents living abroad through a “red notice” issued without proper legal procedures and for political reasons turns this mechanism into an instrument of political persecution. This may be assessed as a violation of legal safeguards provided by international law, especially the principle prohibiting politically motivated extradition.

5.3. Legal Persecution and Convictions in Absentia

One of the most widely used forms of transnational repression in the Azerbaijani context is the mechanism of criminal prosecution and court decisions in absentia against critics living abroad. This approach allows the State, through formal legal procedures, to bring persons physically outside the country under criminal liability, weaken their international legal status, and restrict their activities.

In recent years, Azerbaijani courts and law-enforcement bodies have issued investigative and judicial decisions in absentia against numerous journalists, political activists, and public figures living abroad. Among them, the following should be specifically noted: journalists Sevinj Osmangizi, Ganimat Zahid, and Beydulla Manafov; political analyst Arastun Orujlu; politician and philosopher Abid Qafarov; academic researcher Altay Goyushov; media heads Gurban Mammadov and Tural Sadigli; bloggers and internet activists Suleyman Suleymanli, Manaf

⁴² Hromadske International, *Azerbaijani Opposition Journalist Arrested in Kyiv on Interpol Warrant*, <https://hromadske.ua/en/posts/azerbaijani-opposition-journalist-arrested-in-kyiv-on-interpol-warrant>

⁴³ Freedom House, *Ukraine Should Release Journalist Detained Due to Azerbaijan’s Misuse of Interpol*, <https://freedomhouse.org/article/ukraine-should-release-journalist-detained-due-azerbajjans-misuse-interpol>
Reporters Without Borders, *Ukraine arrests second journalist on Interpol red notice*, 18 October 2017
<https://rsf.org/en/ukraine-arrests-second-journalist-interpol-red-notice>

Jalilzade, Murad Guliyev, Orkhan Aghayev, Mahammad Mirzali, and Elshad Mammadov; as well as other journalists, bloggers, and public activists.⁴⁴

This list is not exhaustive, and facts reported in open sources show that the scale of the practice of prosecution in absentia is broader. Most of the named individuals were targeted because of media activity, political statements, or public positions critical of the Azerbaijani authorities.

Although such court decisions in absentia are presented as legal procedures, in substance they perform the function of a political-persecution tool and have become an institutional component of transnational repression. The following part of the report presents detailed examples of prosecution in absentia concerning some of the above-mentioned individuals and analyses each case in its legal and international context.

5.3.1. The Case of Abid Gafarov

Abid Gafarov is a politician, internet television presenter, and public figure known for his statements on social and political issues. He is particularly known for his work within “Kim TV” internet television and for his public statements on issues that generated public resonance, including violations of law and wartime-related incidents.⁴⁵ Gafarov’s activity has mainly focused on bringing public attention to issues that resonated within Azerbaijani society, especially the events known as the “Tartar case,” and on defending victims in that context. He has made statements openly criticising State bodies and the law-enforcement system.⁴⁶

In 2022, a criminal case was opened against Abid Gafarov, and he was sentenced by court decision to one year of imprisonment. The official charges were based on defamation and insult provisions; however, Gafarov rejected those charges and stated that his activity was politically motivated.⁴⁷ After his imprisonment, Abid Gafarov left the country and continues his activities abroad. In 2025, Azerbaijani law-enforcement bodies initiated a new criminal case against him, accusing him under serious provisions such as calls against the State and incitement to mass unrest. A preventive measure of arrest in absentia was chosen against him, and an international search was announced. His online statements and video materials were presented as the basis for the charges, raising the issue of the criminalisation of political expression.⁴⁸

Abid Gafarov’s case shows that statements made within the framework of public-political activity and freedom of expression may lead to criminal prosecution. His initial imprisonment inside the country and subsequent prosecution in absentia while abroad demonstrate the staged

⁴⁴ Meydan.tv, *Xaricdə yaşayan bloggerlərə qiyabi hökm oxunub*, <https://www.meydan.tv/az/article/xaricde%20yasayan-bloggerlere%20qiyabi-hokm-oxunub/>

⁴⁵ Cpj.org, *Abid Gafarov*, <https://cpj.org/data/people/abid-gafarov/>

⁴⁶ Youtube.com, *KİM.TV*, <https://www.youtube.com/@kimtv1792>

⁴⁷ Irf.org, *Abid Gafarov in prison hospital survived clinical death – spouse*, <https://www.irfs.org/news-feed/abid-gafarov-in-prison-hospital-survived-clinical-death-spouse/>

⁴⁸ Fom.coe.int, *Exiled Journalists Sevinj Osmanqizi and Abid Gafarov Arrested in Absentia?* <https://fom.coe.int/en/alerte/detail/107643314>

character of transnational repression. In this case, criminal prosecution in absentia functions not only as a legal mechanism, but also as an instrument of political control and pressure.⁴⁹

5.3.2. The Case of Altay Goyushov

Altay Goyushov is a well-known historian, academic researcher, and influential figure in the public-intellectual sphere. For many years he has conducted scholarly work on different periods of Azerbaijani history, national identity, religion, and society, participated in a number of international academic projects, and continued his work in academic environments abroad.

Goyushov is known as one of the intellectual figures critical of the policies of the Azerbaijani authorities, particularly through his public statements, analytical writings, and positions shared on social networks. His statements have mainly concerned State governance, the legal system, public freedoms, and the condition of democratic institutions. In this respect, he has acted not only as an academic researcher, but also as a public opinion-shaping figure.

On 18 February 2026, in proceedings chaired by Judge Eldar Ismayilov at the Baku Court of Grave Crimes, A. Goyushov was convicted in absentia under Article 281.2 of the Criminal Code of the Republic of Azerbaijan, concerning public calls directed against the State when committed repeatedly or by a group of persons, and was sentenced to six years of imprisonment. Open sources indicate that these charges are mainly linked to his public-political statements and critical position.⁵⁰

One of the notable features of this case is that Altay Goyushov is not known for any activity associated with violence, but solely for scholarly and public-intellectual work. Nevertheless, the fact that the charge brought against him concerns activities falling within freedom of expression and opinion strengthens the likelihood that the prosecution is politically motivated.

In addition, given that Goyushov lives and works abroad, the conduct of criminal prosecution against him in absentia is of particular importance in the context of transnational repression. It shows that the State is not satisfied only with physical-control capabilities, but also seeks to influence critics beyond its borders through legal mechanisms. The case of Altay Goyushov should be assessed in the context of violations of academic freedom and freedom of expression. The arrest order and criminal prosecution in absentia show that he was targeted for his scholarly and public activity. This case is an example of the use of the trial-in-absentia mechanism as a tool of transnational repression and is inconsistent with the fundamental principles of the European human rights system, especially freedom of expression and the right to a fair trial.

5.3.3. The Case of Beydulla Manafov

Beydulla Manafov is known for his journalistic and media activity. He has been distinguished particularly by his appearances on independent media platforms and his critical position toward

⁴⁹ Tribunat.info, *Mass persecution of immigrant critics: Anti-state appeals or punishment for freedom of expression?* <https://tribunat.info/en/analysis/mass-persecution-of-immigrant-critics-anti-state-appeals-or-punishment-for-freedom-of-expression>

⁵⁰ Meydan.tv, *Altay Göyüşov 6 il müddətinə azadlıqdan məhrum edilib*, <https://www.meydan.tv/az/article/altay-goyusov-6-il-mudd%C9%99tin%C9%99-azadliqdan-m%C9%99hrum-edilib/>

the Azerbaijani authorities. Manafort's activity has mainly concerned commentary on public-political processes, allegations of corruption, and the highlighting of problems in State governance.

A criminal case was initiated against Beydulla Manafort by Azerbaijani law-enforcement bodies, and he was charged under various provisions. On 14 January 2026, in proceedings chaired by Judge Nigar Imanova at the Baku Court of Grave Crimes, he was convicted in absentia and sentenced to eight years of imprisonment. Open sources indicate that these charges are mainly linked to his public-political statements and critical activity. A preventive measure of arrest in absentia was chosen against him, and the trial was conducted without his participation.⁵¹

Beydulla Manafort's case should be assessed in the context of criminal prosecution for journalistic activity. The arrest order and criminal charges in absentia resulted in the restriction of his right to freedom of expression. This case shows that the trial-in-absentia mechanism is used as a means of transnational repression and that media freedom is kept under systematic pressure.

5.3.4. The Case of Elshad Mammadov

Elshad Mammadov is known as a social-media activist and blogger who comments on public-political issues online. On various platforms, he has been distinguished by critical statements about processes taking place in Azerbaijani society, social problems, and State governance.

A criminal case was initiated against him by Azerbaijani law-enforcement bodies, and he was charged under several provisions. A preventive measure of arrest in absentia was chosen against him, and the trial was conducted without his participation. In proceedings before the Baku Court of Grave Crimes, Elshad Mammadov was convicted in absentia and sentenced to nine years of imprisonment. The basis of the charges consisted of his online statements. Together with similar cases, this case shows that the practice of legal prosecution in absentia is used against persons living abroad who speak on public-political topics.⁵²

Elshad Mammadov's case shows that social-media activity and critical statements may lead to criminal prosecution. The arrest order in absentia functions as a legal-pressure mechanism in the context of his exile and confirms that transnational repression is carried out through legal mechanisms.

5.3.5. The Case of Arastun Orujlu

Arastun Orujlu is a political analyst, political scientist, and one of the experts known for commentary on public-political processes. Between 1996 and 2011, he served as the representative for Azerbaijan of Germany's Friedrich Naumann Foundation. Since 2004, he

⁵¹Meydan.tv, *Xaricdə yaşayan Abid Qafarov, Sevinc Osmanqızı və Beydulla Manafortova hökm oxunub*, <https://www.meydan.tv/az/article/xaricd%c9%99-yasayan-abid-qafarov-sevinc-osmanqizi-v%c9%99-beydulla-manafova-hokm-oxunub/>

⁵²Lent.az, *Xaricdəki blogerlərə hökm oxundu*, <https://lent.az/xeber/hadise/xaricdeki-bloqerlere-hokm-oxundu-40655627>

has been one of the founders of the country's first political research centre and served as its head. Orujlu has engaged in analytical activity inside and outside the country, and is particularly known for his statements on security, geopolitics, and State governance. He has also appeared as an expert on various media platforms and has developed as an analytical figure with influence over public opinion. Due to restrictions on the political environment in Azerbaijan, pressure on freedom of expression, and informal obstacles to independent expert activity, Orujlu left the country and continued his work abroad. During his time abroad, he has become known for analytical writings and statements critical of the internal and foreign policies of the Azerbaijani authorities.

A criminal case was initiated against Arastun Orujlu by Azerbaijani law-enforcement bodies, and he was charged under several serious provisions. Open sources indicate that these charges are mainly linked to his public-political statements and analytical positions. A preventive measure of arrest in absentia was chosen against him, and the trial was conducted without his participation. On 19 February 2026, in proceedings chaired by Judge Babek Panahov at the Baku Court of Grave Crimes, he was found guilty in absentia under Articles 220.2, concerning calls to actively disobey lawful demands of representatives of authority, to mass unrest, and to violence against citizens, and 281.2, concerning public calls directed against the State, of the Criminal Code of the Republic of Azerbaijan, and was sentenced to eight years of imprisonment.⁵³

An important feature of this case is that Arastun Orujlu is known not for violent or criminal activity, but solely for analytical and expert work. Nevertheless, the conduct of criminal prosecution against him raises the issue of the criminalisation of political analysis and expert opinion. At the same time, his case should be assessed within the broader context of a policy of legal prosecution in absentia directed against analysts, journalists, and public activists living abroad. This indicates a systemic approach rather than an individual case.

Arastun Orujlu's case should be assessed in the context of restrictions on freedom of expression and freedom of analytical activity. The arrest order and criminal prosecution in absentia show that he was targeted for his public-political position. This case confirms that transnational repression is implemented through legal mechanisms and contradicts European human rights standards, especially freedom of expression and the right to a fair trial.

5.3.6. The Case of Ganimat Zahid

Ganimat Zahid is a journalist, media executive, and head of the internet television platform "Azerbaijan Hour." He began his journalistic activity in the 1990s and later became known for providing commentary and analysis on political and public issues through independent media projects, including the "Azerbaijan Hour" platform. Through this platform, Zahid continued to deliver critical statements on domestic politics, human rights, corruption, and social problems in Azerbaijan.

⁵³ Azadlıq Radiosu, *Ərəstun Oruçluya 8 il həbs cəzası elan edilib*, <https://www.azadliq.org/a/sevinc-osmanqizibas-prokurorluq/33591196.html>

Beginning in 2011, as pressure against media freedom in Azerbaijan intensified, Ganimat Zahid became a target. In 2011, physical pressure and security threats against him increased, and as a result he obtained political asylum in France and continued his activity abroad. While living in France, Zahid regularly broadcast political commentary and critical programmes through “Azerbaijan Hour,” which further aggravated his relations with the authorities.

In September 2025, an official statement by the Prosecutor General’s Office announced that criminal proceedings in absentia had been initiated against G. Zahid, and programmes and video materials broadcast on “Azerbaijan Hour” internet television were included in the indictment. Since Zahid was abroad, the trial was conducted in his absence. On 23 December 2025, in proceedings chaired by Judge Fakhri Mammadov at the Baku Court of Grave Crimes, Ganimat Zahid was convicted in absentia under Article 281.2 of the Criminal Code of the Republic of Azerbaijan, concerning public calls directed against the State when committed repeatedly or by a group of persons, and was sentenced to seven years of imprisonment.⁵⁴ The court materials alleged that his statements promoted calls for violent protests against the authorities, but these allegations were rejected by Zahid and human rights defenders, who linked them to his journalistic activity.

The Ganimat Zahid case shows that a court decision in absentia was used to bring a person living abroad and engaged in professional journalistic activity under criminal liability. It is an example of transnational repression through legal mechanisms aimed at restricting freedom of expression and criminalising critical opinions voiced by independent media.

5.3.7. The Case of Gurban Mammadov

Gurban Mammadov is a well-known lawyer in the country. Since 1987, he has worked as an advocate, legal representative, and human rights defender. Between 1989 and 2014, he was imprisoned three times for his political activity. In 2011, he founded and led “AzeriFreedom” internet television, and through that channel he engaged in legal education for citizens while criticising corruption, human rights violations, and non-transparent methods of governance in Azerbaijan.

In 2018, G. Mammadov left the country for the United Kingdom, where he obtained political asylum. From that period onward, the Azerbaijani government resorted to transnational persecution against G. Mammadov in connection with his activities on AzerFreedom internet television.

In late 2018, British police identified unknown persons sent by the Azerbaijani government who were monitoring G. Mammadov’s son and his school-aged children, and after long-term and consistent measures prevented a real threat to their lives.

On 5 September 2020, in the presence of police officers and State officials and before the eyes of journalists broadcasting live from the scene, apartments in Baku belonging to Gurban

⁵⁴ Azadlıq Radiosu, *Qənimət Zahidə qiyabi hökm oxunub*, <https://www.azadliq.org/a/sevinc-osmanqizi-bas-prokurorluq/33591196.html>

Mammadov and his family members were brutally demolished, and his minor granddaughters living in one of the apartments were forcibly thrown out into the street.⁵⁵

By decision of the Investigation Department of the State Security Service of the Republic of Azerbaijan dated 7 June 2019, G. Mammadov was charged under Article 220.2 of the Criminal Code of the Republic of Azerbaijan, placed on the wanted list, and, by decision of the Sabail District Court of Baku dated 14 June 2019, a three-month preventive measure of arrest in absentia was selected against him.⁵⁶ On 8 September 2020, the Prosecutor General's Office of the Republic of Azerbaijan opened a second criminal case against G. Mammadov. On 20 December 2023, a decision was adopted to bring three new charges against him under Articles 214-2, 220.2, and 284.2 of the Criminal Code of the Republic of Azerbaijan.⁵⁷

In 2021, under G. Mammadov's leadership, horrific military crimes against humanity known in international documents as the "Tartar case" were exposed. Through the public investigation conducted by AzerFreedom TV at that time, the involvement of dozens of generals, high-ranking officers, and State officials in the torture and killing of thousands of soldiers and officers was demonstrated. As a result, 44 persons who had been baselessly accused of treason were acquitted, and several officers who had committed those crimes, including one general, were arrested.

On 13 March 2025, a decision was adopted to bring a new, fourth set of charges against G. Mammadov under Articles 12.1, 34.2, 220.2, 214-2, 12.1, 34.2, 281.2, and 284.2 of the Criminal Code of the Republic of Azerbaijan, and this case was joined with previous cases, initiating criminal prosecution in absentia against him.⁵⁸ During the preliminary investigation, despite G. Mammadov's repeated online requests, his defence rights were not ensured; he was not given the opportunity to familiarise himself with the case materials, and his motions were not granted. On 26 December 2025, by judgment of the Baku Court of Grave Crimes, G. Mammadov was sentenced to 14 years of imprisonment.⁵⁹ In order to prevent G. Mammadov from familiarising himself with the materials of the criminal case, those materials were not integrated into his "personal cabinet" in the "Electronic Court" information system created by the Azerbaijani government. No responses were given to the complaints that G. Mammadov sent to the email addresses of the Baku Court of Grave Crimes and the Baku Court of Appeal. Human rights defenders emphasise that this decision was politically motivated and was not based on sound and transparent judicial procedures.

The following forms of transnational repression are present in the Gurban Mammadov case: legal persecution and court decisions in absentia; indirect pressure and targeting of the close

⁵⁵ Hurriyyet TV, *Qurban Məmmədovun evi dağıdılır və yağmalanır*, <https://www.youtube.com/watch?v=WpmfHU5Jd3w>

⁵⁶ Apa.az, *Qurban Məmmədov Baş Prokurorluğa çağırılıb*, <https://apa.az/hadise/qurban-memmedov-bas-prokurorluga-cagirilib-892618>

⁵⁷ Publika.az, *Qurban Məmmədov da Baş Prokurorluğa çağırıldı*, https://publika.az/news/nida_xeber/561038.html

⁵⁸ Apa.az, *Qurban Məmmədov Baş Prokurorluğa çağırılıb*, <https://apa.az/hadise/qurban-memmedov-bas-prokurorluga-cagirilib-892618>

⁵⁹ Axar.az, *Qurban Məmmədov 14 il azadlıqdan məhrum edildi*, <https://axar.az/news/toplum/1046589.html>

circle; and destruction of property. The persecution of a journalist and media leader living abroad and his targeting through arrest in absentia constitute a serious blow to the principles of the right to security, freedom of expression, and the right to a fair trial.

5.3.8. The Case of Mahammad Mirzali

Mahammad Mirzali is an Azerbaijani blogger and public activist. While living abroad, he prepared critical videos on human rights, corruption, and State governance in Azerbaijan. His activity has been directed particularly against the authorities' non-transparent governance and legal procedures.

In September 2025, in proceedings chaired by Judge Vusal Taghiyev at the Binagadi District Court, a judgment in absentia was delivered against Mahammad Mirzali. According to the judgment, Mahammad Mirzali was found guilty in absentia of calls to mass unrest and public calls against the State, and under Articles 220.2 and 281.1 of the Criminal Code of the Republic of Azerbaijan he was sentenced to six years and six months of imprisonment.⁶⁰ The conviction in absentia and other legal pressures against Mahammad Mirzali contradict the European Convention on Human Rights and international legal norms as part of a systemic practice of targeting journalists living abroad.

The Mirzali case shows that the activities of journalists living abroad are restricted through court decisions in absentia. This is a clear example of transnational repression directed against freedom of expression and the right to a fair trial.

5.3.9. The Case of Orkhan Aghayev and Others

Orkhan Aghayev is a political blogger living in Germany and is known as one of the persons who criticise the Azerbaijani authorities through statements shared on social-media platforms. His activity mainly concerns commentary on public-political processes, corruption, and criticism of governance problems. The Prosecutor General's Office of the Republic of Azerbaijan initiated criminal proceedings in absentia against him. The Orkhan Aghayev case is assessed as a continuation of the practice of investigation and trial in absentia applied against persons living abroad and engaged in political activity. This practice functions as a mechanism of transnational repression directed against freedom of expression and information.

In December 2025, the Baku Court of Grave Crimes delivered judgments in absentia against a group of bloggers living abroad. According to the judgment, Orkhan Aghayev, together with ***Suleyman Suleymanli, Ordukhon Teymurkhan, and others***, was sentenced to nine years of imprisonment.⁶¹ The criminal charges included serious provisions such as fraud, calls to terrorism, disobedience to representatives of authority, calls to mass unrest, and falsification of official documents. Aghayev himself and his supporters reject the charges and assess the sentence as a politically motivated decision intended to restrict his freedom of expression.

⁶⁰News.milli.az, *Məhəmməd Mirzəli qiyabi olaraq 6 il 6 ay azadlıqdan məhrum edildi*, <https://news.milli.az/incident/1293897.html>

⁶¹ Lent.az, *Xaricdəki blogerlərə hökm oxundu*, <https://lent.az/xeber/hadise/xaricdeki-blogerlere-hokm-oxundu-40655627>

The Orkhan Aghayev case should be assessed as the legal, in-absentia component of transnational repression. Unlike violent and criminal activity, he was accused only because of expression and criticism, and the implementation of these charges through a court decision in absentia creates the risk of violating fundamental principles such as freedom of expression and the right to a fair trial.

5.3.10. The Case of Sevinj Osmangizi

Sevinj Osmangizi is a journalist living abroad and the head of Osmangizi internet television. She is known for her work in the field of media and freedom of expression in Azerbaijan. Her activity is particularly directed against the authorities' critical positions.

The Binagadi District Court selected a preventive measure of arrest in absentia against her. Later, on 14 January 2026, in proceedings chaired by Judge Nigar Imanova at the Baku Court of Grave Crimes, Osmangizi was convicted in absentia and sentenced to eight years of imprisonment.⁶² Osmangizi was charged under Articles 220.2 and 281.2 of the Criminal Code of the Republic of Azerbaijan, which in fact demonstrates the use of a legal mechanism for politically motivated repression.⁶³

The Sevinj Osmangizi case shows that journalists living abroad are targeted through court decisions in absentia. This is a clear example of transnational repression directed against freedom of expression and information.

5.3.11. The Case of Tural Sadigli

Tural Sadigli is an Azerbaijani journalist, blogger, and public activist known as the head of "Azad Soz" internet television. Through this platform, he conducted independent journalism on political, social, and governance issues in Azerbaijan, and broadcast sharp critical statements regarding the activities of the authorities, corruption, abuses by law-enforcement bodies, and citizens' rights. The "Azad Soz" channel gained a wide audience as the central platform of Sadigli's public activity.

Beginning particularly in the mid-2020s, Sadigli criticised the authorities' policy of putting public opinion under pressure through videos disseminated on social media and through "Azad Soz," and raised issues of democracy and freedom of speech. These statements stimulated public discussions on media independence and freedom of expression. On the basis of these statements, an Azerbaijani court selected a preventive measure of arrest in absentia against him. Later, as a result of proceedings in absentia, Sadigli was sentenced to imprisonment for critical materials broadcast through "Azad Soz." According to open legal sources, this decision

⁶² Azadlıq Radiosu, *Jurnalist Sevinc Osmanqızıya qiyabi 8 il həbs verilib*, <https://www.azadliq.org/a/sevinc-osmanqizi-bas-prokurorluq/33591196.html>

⁶³ News.milli.az, *Sevinc Osmanqızı və digərlərinə hökm oxundu*, <https://news.milli.az/country/1311317.html>

in absentia was carried out at the same time as cases involving other journalists and bloggers living abroad.⁶⁴

Tural Sadigli's case shows that independent journalism and public analytical activity, specifically critical content disseminated through platforms such as "Azad Soz," are used as a basis for criminal liability. The issuance of an arrest order in absentia is an example of the implementation, through legal mechanisms, of transnational repression directed against both freedom of expression and media freedom. This case is in serious conflict with principles protected by the European Convention on Human Rights, including freedom of expression and the right to a fair trial.

5.4. Digital Surveillance

In the current stage of transnational repression, one of the subtler but effective tools is the mechanism of punishment and pressure carried out through digital surveillance and spyware. This approach creates a serious threat not only within physical borders, but also for journalists, human rights defenders, political activists, and opposition figures living abroad. Their private communications, phone calls, emails, and other digital resources are secretly monitored, directly harming both their personal security and their professional activity.

5.4.1. Pegasus Spyware

One of the best-known examples of this practice concerns international investigations related to *Pegasus spyware*. Pegasus is spyware developed by the Israeli company NSO Group and reportedly sold only to governments. According to sources, the programme makes it possible to secretly infiltrate mobile phones, monitor messages and calls, and remotely activate microphones and cameras.⁶⁵ The international journalistic investigation known as the Pegasus Project showed that this tool had been used in many countries against various targets, including journalists, activists, human rights defenders, and politicians, and that although it was presented as lawful surveillance, it became an effective means of pressure.

In the Azerbaijani context as well, the Pegasus Project and related investigations show that the telephone numbers of more than 200 journalists and activists operating inside and outside Azerbaijan were selected as targets by Pegasus, and attempts to gain secret access to their data were recorded. This not only resulted in the acquisition of journalists' personal information, but also created a serious threat to their freedom of expression, privacy, and psychological integrity.⁶⁶

⁶⁴ Apa.az, *Orduxan Teymurxan, Qurban Məmmədov, Tural Sadiqlı, Rəfael Piriye və digərlərinə hökm oxunub*, <https://apa.az/hadise/orduxan-teymurxan-qurban-memmedov-tural-sadiqli-refael-piriyev-ve-digerlerine-hokm-oxunub-932562>

⁶⁵ Occrp.org, *Azərbaycanın Rəqəmsal Avtokratiyasındakı Həyat: Onlar hər şeyə nəzarət etmək istəyirlər*, <https://www.occrp.org/en/project/the-pegasus-project/azerbaycanin-reqemсал-avtokratiyasindaki-heyat-onlar-her-seye-nezarət-etmek-isteyirler>

⁶⁶ Access Now / UPR Info, 2023, *Azerbaijan's use of Pegasus spyware in violation of human rights*, https://upr-info.org/sites/default/files/country-document/2023-08/Access_Now_Fact_Sheet.pdf

Digital surveillance and online pressure are not limited to technical interference. The use of such technologies by States is contrary to international human rights norms and is aimed at weakening the reputation of target persons in diaspora and international environments and isolating them. These methods form the technological component of contemporary transnational repression and challenge international principles of freedom of expression and protection of private life.⁶⁷

In October 2025, the European Court of Human Rights began the communication stage in complaints concerning the surveillance of Azerbaijani journalists and public activists through Pegasus. The Court is examining this issue in two joined cases based on complaints submitted by 59 persons. This development is a clear indication of the need to assess digital surveillance from the perspective of legal accountability.⁶⁸

5.4.2. The Example of Kamran Nasirli

Another example of digital surveillance is the case of **Kamran Nasirli**. Because he cooperated with media outlets such as “Hürriyyət” and “Turan” and conducted critical journalistic activity, he was subjected to pressure and therefore left the country and applied for political asylum in Switzerland.⁶⁹ Despite this, he is subjected to digital pressure of a transnational character by Azerbaijani law-enforcement bodies. In December 2025, informal contact was made with him through “WhatsApp,” first with his spouse and later directly with him. Persons presenting themselves as police officers demanded that he return to Azerbaijan and report to the police, but at the initial stage no official summons was presented. The subsequent sending of a formal summons by email may be assessed as an attempt to legitimise the earlier informal pressure.⁷⁰ This case shows that digital means are used as an instrument of transnational repression.

Such technological tools and applications systematically violate individuals’ rights and are used to bring their lives, freedom of movement, and political participation under control even beyond the borders of State authority. Consequently, digital surveillance reflects an expanded form of transnational repression carried out not only through physical but also through digital tools.

5.5. Pressure on Family Members

One of the subtler but highly effective forms of transnational repression is the use of pressure mechanisms against family members and close associates. Under this practice, the parents, spouses, children, and other relatives of journalists, bloggers, human rights defenders, and political activists living abroad are targeted. The aim is not to exert direct physical influence

⁶⁷ Mediadefence.org, *Media Defence files four cases at the ECtHR concerning use of Pegasus spyware by the Azerbaijan government*, <https://www.mediadefence.org/news/pegasus-spyware-azerbaijan/>

⁶⁸ Toplum.tv, *Avropa Məhkəməsi Azərbaycanda casus proqramla izlənən 59 nəfərin işi üzrə kommunikasiya başladır*, <https://toplummedia.tv/mehkeme/pavropa-mehkemesi-azerbaycanda-casus-proqramla-izlenen-59-neferin-isi-uumlzre-kommunikasiya-basladirp>

⁶⁹ Medianews.az, *Azərbaycanda bu qəzet fəaliyyətini dayandırdı*, <https://medianews.az/azerbaycanda-bu-qezet-fealiyyetini-dayandirdi>

⁷⁰ Foto.info.az, *Avropda yaşayan jurnalist təqib olunur*, <https://foto.info.az/arasdirma/25782-avropda-yasayan-jurnalist-tqib-olunur.html>

on the target person, but to create psychological, social, and emotional pressure on that person, restrict their activity, or force them to withdraw from their political position.

The strategy of indirect pressure allows States to keep critics living beyond the border under control through their social ties remaining inside the country. This approach not only operates at the individual level, but also creates an atmosphere of fear in the diaspora environment and has a preventive effect on other activists, thereby becoming a collective-impact mechanism of transnational repression.

This section records systematic pressure directed at family members and close associates. Concrete examples are described under the following sub-points:

5.5.1. Dismissal of Relatives from Employment

As a result of purposeful policies by the authorities, close relatives of targeted individuals have been dismissed from State institutions and from public or private-sector positions. In this practice, pressure is exerted on institution heads and management structures to ensure that relatives' professional activity is terminated. The purpose of such cases is both to undermine the family security of the target person and to silence the primary target through socio-economic pressure. For example, information published by Amnesty International in 2024 notes that social and economic pressure mechanisms are widely used in Azerbaijan against family members of government critics, and that this forms part of a systematic strategy used to silence critical voices. This approach is not limited to the violation of individual rights; it also turns the family institution itself into a tool of pressure and expands the reach of repression.⁷¹

5.5.2. Plundering of Property Rights

There are also examples of violations of property rights in the Republic of Azerbaijan. In incidents involving human rights defender Gurban Mammadov and his family, the forced demolition of property belonging to the target person and family members, and the seizure of property without compliance with urban-planning rules, were recorded against the background of his activity abroad. In such cases, not only administrative mechanisms but also repressive mechanisms outside the legal framework are applied.⁷²

5.5.3. Administrative Sanctions against Family Members

One concrete and documented example of this practice concerns the Azerbaijani video-blogger and public activist *Ordukhon Teymurkhan*, who lives abroad. In February 2017, after his statements in Germany against the Azerbaijani government, his family members living in Azerbaijan were targeted. Twelve of his relatives, including a minor family member, were detained by the police. The following day, two of the relatives were sentenced administratively to 30 days' detention. This incident clearly demonstrates that measures applied against family

⁷¹ Amnesty International, *Azerbaijan: Repression of critics extends to family members*, 2024 <https://www.amnesty.org/en/location/europe-and-central-asia/azerbaijan/report-azerbaijan/>

⁷² Hurriyyet TV, *Qurban Məmmədovun evi dağıdılır və yağmalanır*, <https://www.youtube.com/watch?v=WpmfHU5Jd3w>

members directly aim to influence the activity of the target person and may be assessed as a classic example of transnational repression.⁷³

The case involving Jamil Hajiyeu is also an example of transnational repression carried out indirectly and through family members. After Jamil Hajiyeu left the country in 2025, a criminal case was opened against him on charges including receiving funding from foreign foundations, tax evasion, and attempting to seize power by force. In parallel, pressure measures were carried out against his family members who remained in the country. Vehicles belonging to him and to his relative were taken without any legal basis, placed in a penalty parking area, and their return was made conditional on his return to the country.⁷⁴ These cases show that the use of legal and administrative mechanisms to exert pressure through family members functions as an instrument of transnational repression aimed at influencing the conduct of political activists active abroad.

5.5.4. Interference with Moral and Spiritual Values

Pressure is not limited to economic and administrative means; it is also directed at individuals' moral and religious rights. For example, the deliberate desecration of the grave of human rights defender Vidadi Isgandar's father⁷⁵ should be assessed not only as disrespect toward a private space, but also as an act of pressure directed against the moral values of the victim's family. Such incidents have been accompanied by the inaction of State structures, demonstrating the systematic and planned nature of the repression.

Reports of international human rights organisations also show that such pressure is not limited to detention and administrative punishment. Cases are recorded of tax inspections, workplace pressure, restrictions on social benefits, and other administrative measures used against close relatives of activists living abroad. These measures have a systemic character, affect individuals' social welfare and security, and ultimately aim to influence the behaviour of the target person indirectly.

From a legal standpoint, such practice is assessed as collective punishment and is contrary to international human rights standards, including the principle of individual responsibility. The targeting of family members not only violates their rights to personal liberty and security, but also weakens the target person's ability to obtain effective legal protection. This once again confirms that transnational repression has not only an individual but also a systemic and institutional character.

5.6. Attacks and Killings Abroad

One of the most radical and dangerous forms of transnational repression is ***physical violence and killings*** abroad. This form is characterised by States' direct or indirect use of force beyond

⁷³ Ecoi.net, *Azerbaijani Activist's Family Arrested, Harassed - Stop Targeting Relatives of Exiled Critics*, <https://www.ecoi.net/en/document/1395233.html>

⁷⁴ İctimaixeber.org, *Cəmil Hacıyev haqqında axtarışlar səngimir*, <https://ictimaixeber.org/2025/05/23/cmil-haciyev-haqqnda-axtarlar-sngimir.html>

⁷⁵ NatiqEdilov, *Vidadi İsgəndərlinin atasının məzarının təhqir edilməsi barədə*, <https://www.youtube.com/watch?v=HjHhfEY0czI>

their borders against their critics and is assessed as a gross violation of fundamental principles of international law. In such cases, a direct threat is created to the life and health of target persons, while an atmosphere of fear and deterrence is also formed for other exile activists and journalists.

One of the most notable forms of violence abroad is the open designation of certain groups as “legitimate targets” through political rhetoric. Such an approach not only creates psychological pressure, but may also create conditions for physical violence. For example, in his speech in the Milli Majlis on 5 March 2024, member of parliament Zahid Oruj used expressions to the effect that those who speak against the President and his family “should be declared open to all forms of neutralisation as legitimate targets.”⁷⁶ Experts assessed this statement as a call to violence.

This type of repression is carried out according to various models, and several different practical approaches have been observed in the Azerbaijani context.

5.6.1. Direct Physical Violence

In this respect, the 2026 incident in Washington, D.C., United States, is noteworthy. According to reports, during a visit by the President of Azerbaijan, persons belonging to his security service entered into a physical confrontation with individuals holding a protest, and the protest participants were subjected to violence. Video footage circulated in connection with the incident showed bodyguards using physical force against protesters. This incident is assessed as a concrete example of State-linked persons using force on foreign territory and raises additional legal questions within the jurisdiction of the host State.⁷⁷

5.6.2. Indirect Physical Violence

Indirect physical violence consists of attacks carried out through third parties. In this context, the attack in 2020 against the blogger *Mahammad Mirzali*, who lives in France, should be specifically noted. He was attacked with a weapon, stabbed, and seriously wounded. The incident was linked to his political activity and was assessed as an indirect-violence form of transnational repression. Although such attacks are formally carried out by unofficial actors, their motivation and choice of target are closely connected to the political context.⁷⁸

5.6.3. Killings and Cases of Violence Resulting in Death

In this context, it should be emphasised that physical attacks and deaths occurring within the framework of transnational repression should not be assessed merely as isolated acts directed against the right to life of separate individuals, but as part of a broader, purposeful, and systemic

⁷⁶ Meydan.TV, *Zahid Oruc: “Prezidenti təhqir edənlər legitim hədəflər kimi hər cür zərərsizləşdirilməlidir”*, <https://www.meydan.tv/az/article/zahid-oruc-prezidenti-tehqir-edenler-legitim-hedefler-kimi-her-cur-zerersizlesdirilmelidir/>

⁷⁷ Theguardian.com, *Bodyguards for Azerbaijani president, in town for Trump’s Board of Peace, attack protesters in DC*, <https://www.theguardian.com/us-news/2026/feb/20/azerbaijan-trump-board-peace-protestors>

⁷⁸ Cpj.org, *Exiled Azerbaijani blogger Mahammad Mirzali stabbed at least 16 times in knife attack in France*, <https://cpj.org/2021/03/exiled-azerbaijani-blogger-mahammad-mirzali-stabbed-at-least-16-times-in-knife-attack-in-france/>

mechanism of influence. Such cases serve, on the one hand, to physically neutralise or silence the target persons and, on the other hand, to create a deterrent effect for other political activists, human rights defenders, and journalists operating abroad.

From a legal perspective, such acts are assessed as gross and systematic violations of the right to life and also raise the issue of State responsibility for human rights violations occurring abroad through direct or indirect means of influence, and not only within a State's own jurisdiction. In this respect, such cases openly contradict the right to life guaranteed by Article 2 of the European Convention on Human Rights and bring to the fore the duty of States to conduct adequate, effective, and transparent investigations.

Consequently, cases of physical violence and death abroad constitute the harshest and most overt form of transnational repression and clearly demonstrate that this phenomenon is a multi-dimensional and systemic source of danger both for individual rights and for the international legal order.

Against this general legal and conceptual framework, the concrete cases presented below more clearly demonstrate the practical manifestations of transnational repression and its real consequences.

5.6.3.1. Vidadi Isgandarli

The killing in France of Vidadi Isgandarli, a lawyer and public activist living abroad, is assessed as one of the gravest consequences of transnational repression. Although the fact of the incident has been confirmed, the legal assessment of its motives and possible commissioned character has not been fully completed.⁷⁹

5.6.3.2. Bayram Mammadov

One of the cases drawing particular attention in the context of transnational repression is the death of Bayram Mammadov. He had been imprisoned on politically motivated charges and, after his release, travelled to Turkey. Serious questions surround the case of his body being found in the sea in Istanbul. The inadequacy and lack of transparency of the investigation into the incident, as well as the failure to disclose its results, increase suspicions that this death may not have been accidental. This case should be assessed separately in the context of physical-security risks as a more extreme form of transnational repression.⁸⁰

5.6.3.3. Vugar Rzayev

On 15 January 2021, police in the Belgian city of Mechelen found Vugar Rzayev, a former member of the Azerbaijan Popular Front Party who had been in exile, dead. This mysterious

⁷⁹ Oc-media.org, *Exiled Azerbaijani activist Vidadi Isgandarli dies after stabbing in France*, <https://oc-media.org/exiled-azerbaijani-activist-vidadi-igandarli-dies-after-stabbing-in-france/>

⁸⁰ Amerikaninsesi.org, *Elgiz Qəhrəman: Bayram Məmmədovun ölümü "şübhəli ölüm" kimi qeydə alınıb*, <https://web.archive.org/web/20250411000417/https://www.amerikaninsesi.org/a/elgiz-q%C9%99hr%C9%99man-bayram-m%C9%99mm%C9%99dovun-%C3%B6l%C3%BCm%C3%BC-%C5%9F%C3%BCbh%C9%99li-%C3%B6l%C3%BCm-kimi-qeyd%C9%99-al%C4%B1n%C4%B1b/5881899.html>

death has raised numerous unanswered questions.⁸¹ Vugar Rzayev disappeared on 30 December 2020. On that day, he left the apartment where he lived, saying he was going to work, and did not return. The Mechelen police stated that his body had been found in a deep pit in a forest.

5.6.3.4. Huseyn Bakhikhanov

Reports emerged that Azerbaijani citizen Huseyn Bakhikhanov, who had applied to the Georgian government for political asylum, died in Tbilisi on 14 July 2021. According to official information, he threw himself from one of the hotels in Tbilisi. A criminal case was opened under the provision concerning incitement to suicide. His suspicious death, the concealment of the death for two weeks, and statements by the hotel management have raised very serious doubts.⁸²

5.6.3.5. Daphne Caruana Galizia

The 2019 report adopted by the Parliamentary Assembly of the Council of Europe on the assassination of journalist Daphne Caruana Galizia and the rule of law in Malta notes that the journalist's work covered high-level corruption, including financial and energy agreements connected to foreign actors. In her investigations, financial flows linked to Azerbaijan and contracts associated with SOCAR were of particular focus. In this context, the journalist's murder is assessed not only within a national framework, but also against the background of the intersection of transnational corruption and political-economic interests.⁸³ This case shows that transnational repression, or risks associated with it, may be directed not only against political activists, but also against journalists exposing international corruption networks, and that the mention of State-linked or State-associated commercial structures in such cases demonstrates their complex and multi-sided character.

6. Conclusions

The analysis demonstrates that, in the Azerbaijani context, transnational repression is not a set of isolated episodic incidents, but a complex State policy with an institutional character and implemented through various instruments. The following main conclusions have been identified:

6.1. Systemic and Multi-Layered Repression Mechanism

The Azerbaijani authorities apply transnational repression in a systematic and coordinated manner. Various instruments, including physical violence, criminal prosecution in absentia, extradition and deportation attempts, digital surveillance, and pressure on family members, are

⁸¹ Amerikaninsesi.org, *Azərbaycanlı mühacirin Belçikada meyiti tapılıb*, <https://www.amerikaninsesi.org/a/az%C9%99rbaycanl%C4%B1-m%C3%BChacirin-bel%C3%A7ikada-meyiti-tap%C4%B1%C4%B1b-5740163.html>

⁸² Azadliq.org, *Sığınacaq istəyən azərbaycanlı blogerin Tbilisidə meyiti tapılıb*, <https://www.azadliq.org/a/azərbaycanlı-bloger-tbilisi/31386205.html>

⁸³ Pace.coe.int, *Daphne Caruana Galizia's assassination and the rule of law in Malta and beyond: ensuring that the whole truth emerges*, <https://pace.coe.int/en/files/27724/html>

used in parallel and in mutually reinforcing ways. This shows that the repression is not accidental, but a strategically planned policy.

6.2. Structural Threat to the European Legal Space

This practice poses a systemic threat to the fundamental principles established in the European legal space, especially freedom of expression, the inviolability of private life, and the right to an effective remedy. Cases of transnational repression create precedents that weaken the effectiveness of the mechanisms for applying the European Convention on Human Rights.

6.3. Erosion of the Legal and Physical Security of Persons Living Abroad

Journalists, human rights defenders, and political activists living abroad operate in an environment of constant pressure and risk. Not only their legal status, but also their physical security and social stability are under threat. This situation calls into question the practical effectiveness of States' obligation to protect persons within their jurisdiction.

6.4. Instrumentalisation of International Legal Mechanisms

Extradition procedures, Interpol mechanisms, and other legal-cooperation tools are used for political purposes, causing mechanisms that are legal in nature to turn into political instruments. This weakens the reliability of international legal cooperation and undermines the principle of mutual trust.

6.5. Expansion of Digital and Non-Traditional Instruments of Repression

Spyware, online surveillance, and information manipulation have become new and rapidly expanding components of transnational repression. This trend shows that repression is no longer limited to physical space but has acquired a continuous and borderless character in the digital environment as well.

6.6. Collective Impact and Deterrent Effect

Pressure mechanisms against family members and close associates move the impact of transnational repression from the individual level to the collective plane. This creates an atmosphere of fear and self-censorship that affects not only specific target persons, but also the wider diaspora environment.

6.7. Precedent and Risk of Diffusion

The Azerbaijani example shows that, in the absence of effective oversight and response mechanisms, transnational repression can become a model that other States may imitate. This creates a long-term systemic risk to the principle of the rule of law in the European space.

6.8. Insufficiency of International Response Mechanisms

Existing international and regional mechanisms, including judicial oversight, political monitoring, and diplomatic reactions, are still not fully effective in preventing transnational

repression. This demonstrates the need for a stronger institutional response and coordinated measures.

7. Recommendations

Based on the analysis conducted, the following measures are recommended in order to prevent transnational repression and ensure the effective protection of human rights:

7.1. For the Council of Europe and PACE

- A special rapporteur on transnational repression should be appointed, and that mandate should include fact-finding missions in member States, annual reports, and urgent-intervention mechanisms.
- An institutional monitoring mechanism should be established in this field, creating a system for systematic data collection, early warning, and risk assessment in relation to cases of transnational repression.
- A unified response framework for member States should be developed to ensure a coordinated approach to politically motivated extradition, deportation, and legal persecution.
- A thematic resolution or recommendation on transnational repression should be adopted, setting minimum legal standards for member States.

7.2. For Member States

- When deciding on politically motivated extradition and deportation requests, the principle of non-refoulement and human rights risks should be taken into account as a matter of priority, and such requests should be systematically rejected.
- Asylum, temporary protection, and legal-aid mechanisms should be strengthened for journalists, activists, and exiles at risk.
- Criminal-law and administrative measures, including sanctions mechanisms, should be applied against transnational repression activities of foreign States.
- National-level legal protection and cybersecurity measures should be strengthened against the use of digital surveillance and spyware.

7.3. For Interpol

- Filter and review procedures that prevent politically motivated abuses of red notices and other search mechanisms should be strengthened.
- Complaint mechanisms should be made more accessible and effective, and expedited review procedures should be applied for the protection of individuals' rights.
- Mechanisms for independent legal assessment of information submitted by member States should be expanded.

7.4. For the Azerbaijani Authorities

- Politically motivated criminal prosecutions and court decisions in absentia should be terminated, and criminal prosecution should be carried out only within lawful, transparent, and evidence-based procedures.

- All practices related to transnational repression, including pressure on family members, digital surveillance, and persecution abroad, should be ended immediately.
- ECtHR judgments should be implemented fully and in a timely manner, and international legal obligations should be complied with.
- Independent oversight and accountability mechanisms regarding the activities of law-enforcement and security bodies should be strengthened.

Concluding Remarks

This report shows that transnational repression is no longer merely a national problem; it is a serious challenge to the integrity of the European legal system, to member States' human rights obligations, and to the rule of international law. This threat encompasses not only individual human rights violations, but also seriously affects the reliability and effectiveness of international legal mechanisms.

The report's analysis shows that transnational repression has a multi-layered and coordinated character, with tools such as physical violence, court decisions in absentia, deportation, digital surveillance, and pressure on family members complementing one another and systematically restricting the rights of target persons.

The response to this must be collective, coordinated, and systematic. The Council of Europe, PACE, member States, and international institutions should act together and effectively apply both preventive and reactive mechanisms in order to prevent transnational repression, protect the rights of persons at risk, and strengthen legal protection.

This approach entails not only providing legal protection, but also a long-term and institutional response to policies and practices that have the potential to create precedents within the European legal space.

Brief Information about the Azerbaijan Popular Parliament

The Azerbaijan Popular Parliament (APP) is an alternative representative platform formed on the initiative of civil society. Its members include activists, human rights defenders, scholars, and independent experts representing different public and political views.

The main purpose of APP is to contribute to the establishment of democracy, the rule of law, and human rights in Azerbaijan, to strengthen public oversight mechanisms, and to expand citizens' opportunities for political participation.

The Parliament is guided in its activity by the principles of transparency, accountability, and inclusiveness, and regularly issues statements, reports, and analytical documents. It is also open to cooperation with international organisations and acts in line with the global human rights agenda.

APP takes an active position particularly in the defence of persons subjected to political persecution, the protection of electoral rights, and the development of democratic institutions.

This report was prepared at the initiative of APP by Atakhan Vali Abilov, lawyer and member of the Presidium of the Azerbaijan Popular Parliament.

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