Observatoire ARGA

INTERNATIONAL ANALYTICAL REPORT

D-08. Prosecution for Economic Offences and Indicators of Possible Political Motivation

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1. Executive summary and principal findings

A prosecution for an economic offence may have a factual basis and at the same time be used to exert improper pressure. The reverse situation is also possible: the accused is associated with the opposition, is in conflict with influential individuals or owns a significant asset, yet the proceedings retain an ordinary criminal character. An inquiry into political motivation must therefore begin with the specific decision, its legal basis, the alleged ulterior purpose and the evidence connecting them, rather than with a characterisation of the individual or an assessment of the political regime.

This report proposes a verifiable analytical framework for four procedures: extradition, international protection, the review of INTERPOL data and proceedings before the European Court of Human Rights. These cannot be combined into a single universal test. Refusal of extradition concerns whether a person may be surrendered; asylum concerns the grounds for protection against persecution; the Commission for the Control of INTERPOL's Files, referred to below as the CCF, examines whether data processing complies with the Organisation's rules; and the ECtHR examines compliance with specific Convention obligations. The use of the same factual material does not make the outcomes interchangeable. [1-14]

The principal methodological finding is that four questions must be examined separately. Is there specific information about the alleged economic offence? Has a political or other improper purpose been established? Is that purpose connected to the measure under consideration, and does it carry the significance required by the applicable legal test? What consequence does the applicable law permit? An affirmative answer to the first question does not exclude abuse, while a negative answer does not, by itself, establish a political motive.

The most informative evidence reveals the mechanism of pressure: a demand to transfer an asset in exchange for discontinuing proceedings; the use of detention to obtain politically significant information unrelated to the charge; individualised threats; the attribution of a political opinion to the person; or an unexplained difference in treatment between comparable participants in the same transaction. Its significance depends on authenticity, context, the connection to an actor with relevant authority and alternative explanations. A country's general reputation, the proximity of elections and association with a previous administration more often identify an avenue for inquiry than provide a sufficient basis for a final conclusion.

Positive and negative outcomes are considered together. Gusinskiy demonstrates the impermissibility of turning detention into a means of commercial bargaining. Merabishvili explains mixed purposes and changes in the predominant purpose over time. Kezerashvili shows that a violation of judicial impartiality and favourable decisions in other procedures do not automatically establish an ulterior political purpose. CCF practice illustrates the importance of a specific account of the person's alleged role and the insufficiency of general political assertions. [6-8; 12-14]

The proposed method is qualitative. It does not assign scores to cases, calculate the probability of a successful complaint or classify a person as “politically persecuted” by counting indicators. Its output is a reasoned conclusion for a particular procedure, identifying substantiated circumstances, competing explanations and missing information. The report relies on publicly available primary sources as at 23 September 2026; it contains neither statistics on the prevalence of abuse nor information about ARGA's client practice.

2. Scope of the inquiry and conceptual boundaries

For this report, prosecution for economic offences means proceedings concerning the alleged unlawful acquisition, use, movement or retention of property and funds, financial reporting, taxation, the management of organisations and public resources. This is a working description of the subject, rather than a uniform international classification of offences. Identical offence labels in different states do not guarantee identical constituent elements, thresholds of liability or procedural consequences.

Political motivation is likewise not a universal legal term with an unchanging meaning. A distinction must be drawn between the political character of the act itself, the purpose of the actor initiating the prosecution, discriminatory treatment on account of political opinion and the political consequences of an ordinary investigation. A corruption case against a former minister may have considerable electoral consequences without an established improper purpose. Conversely, an apparently private property dispute may engage attributed political opinion if influential actors perceive resistance to unlawful conduct as a challenge to their authority or methods. [1; 5; 11]

An improper commercial purpose is a separate category. Compelling the transfer of a business through criminal proceedings is a serious human rights concern, but does not in itself establish persecution on account of political opinion. An additional connection must be demonstrated where the chosen ground of protection requires it. Otherwise, a convincingly established abuse will be described inaccurately in legal terms, and the dispute will shift from substantiated pressure to an unsubstantiated political characterisation.

The unit of analysis should be a particular action rather than "the case as a whole": the initiation of proceedings, amendment of charges, remand in custody, extension of a restriction, an international wanted-person alert, an extradition request, cancellation of a document or exploitation of a person's procedural vulnerability to make an extraneous demand. Different actions may have different initiators, purposes and evidential foundations. Later abuse does not necessarily mean that the original investigation was wholly fabricated; an initially sound basis does not justify every subsequent measure.

The report does not determine the guilt of the individuals in the cases examined or reassess domestic criminal evidence in place of the competent court. Where it describes the prosecution's account or that of an INTERPOL National Central Bureau, it identifies it as such. Judicial findings are stated within the limits of the question actually resolved. It is particularly important to distinguish a finding of inadmissibility, a finding of no violation on the merits and a positive finding of an improper purpose: these procedural outcomes cannot be reduced to the same phrase, "the court disagreed".

The sample is purposive and methodological. It includes decisions that allow different evidential structures and the limits of conclusions to be compared. It does not represent all states, offences or national approaches. Published anonymised CCF excerpts cannot yield a reliable frequency of politically motivated requests. The absence of a publicly available decision likewise establishes neither the absence of a problem nor a favourable outcome in a particular application.

3. Four procedures: different questions and consequences

In extradition proceedings, the political argument primarily concerns a bar to surrender. Article 3 of the European Convention on Extradition distinguishes a political offence from a situation in which a request relating to an ordinary criminal offence has an impermissible purpose or the person's position may be prejudiced for one of the reasons specified in the provision. The domestic regime, applicable treaty, reservations and special provisions require separate examination. The existence of the Convention does not mean that every request between any two states is examined under an identical model. [1]

In international protection, the inquiry is broader than an individual extradition request. It concerns a well-founded fear of persecution, its seriousness, its connection to a protected ground, the availability of protection and possible grounds for exclusion. In economic cases, the distinctions between ordinary criminal prosecution, disproportionate or discriminatory punishment and the use of criminal machinery against a person to whom a political opinion is attributed are particularly important. Permission to reside must not automatically be described as recognition as a refugee. [3-5; 13]

The CCF reviews the processing of data in INTERPOL's information system. For Article 3 of the Organisation's Constitution, assessment of the predominant character of the case, taking account of all relevant factors, is important. The person's alleged economic role matters because a formal reference to an offence does not replace a description of the facts. The Commission does not, however, conduct a full criminal investigation or determine guilt. A decision that data comply with the rules does not endorse every domestic procedural act. [9-13]

The ECtHR examines a complaint within its jurisdiction and by reference to the relevant right. Article 18 ECHR concerns the use of permitted restrictions for other purposes and operates in conjunction with another Convention provision. Where there are multiple purposes, the Merabishvili approach requires identification of the predominant one. It cannot mechanically be converted into the standard for asylum or for every domestic extradition objection. Even the similar word “predominance” in INTERPOL practice denotes analysis in a different institutional and normative context. [6]

The temporal focus also differs. A court deciding on surrender examines the consequences of a proposed return. In a particular complaint, the ECtHR may assess acts that have already taken place and whether their purpose has been proved. The CCF examines the permissibility of a particular instance of data processing. Differences in outcomes may therefore be explained by the question, the date of assessment or the material available, rather than by a contradiction between bodies. Kezerashvili directly demonstrates the limits of transferring conclusions from extradition and the INTERPOL system into Convention proceedings. [8, § 129]

A practical submission should begin with a precise request: which body is being asked to make which decision and on what legal basis? The formulation “recognise the case as political” is often too indeterminate. It is more useful to identify the specific extradition bar, ground for international protection, breach of processing rules or Convention complaint. This then determines which circumstances are legally material, which documents substantiate them and what lies outside the recipient's competence.

4. Extradition: the purpose of the request and the risk of prejudicial treatment

Article 3(1) of the European Convention on Extradition concerns offences that the requested Party considers political or connected with a political offence. Article 3(2) addresses a different situation: a request formally concerns an ordinary criminal offence, but substantial grounds exist for believing that its purpose is to prosecute or punish on account of race, religion, nationality or political opinion, or that the person's position may be prejudiced for one of those reasons. This distinction is particularly important for financial charges that outwardly have no connection with political activity. [1]

Section 81 of the United Kingdom's Extradition Act 2003, which concerns extradition to category 2 territories, also distinguishes two limbs. The first concerns the actual purpose of the request: prosecution or punishment on one of the listed grounds. The second concerns possible prejudice at trial, punishment, detention or restriction of personal liberty following extradition. The list includes political opinions, gender and sexual orientation, among other grounds. These provisions must not be transferred without examination to other United Kingdom surrender or extradition regimes. [2]

For the first limb, information about the origin of the request and the connection between criminal machinery and the alleged purpose is important. For the second, individual indicators of future treatment may be material even where the initial investigation had a legitimate basis. An evidential memorandum should therefore examine the two propositions separately. A document supporting the basis for the charge does not necessarily answer the question of discrimination after surrender. Conversely, information about the general condition of the courts does not automatically establish that this particular request seeks to punish political opinions.

The proper sequence is to identify the applicable rule, reconstruct the requesting state's account and then examine the specific objection. The text of the request, or the most accurate available account of the alleged facts, decisions on preventive measures, information on the stage of proceedings and documents linking the individual to the alleged transactions are needed. Without them, political argument risks answering a public summary of the accusation rather than the legal basis for surrender.

Assurances about treatment following extradition form a distinct category. A diplomatic promise does not, by its mere existence, dispose of the question of the purpose of the prosecution. Equally, an allegation of political motivation does not remove the need to analyse risks to life, treatment and procedural fairness under applicable independent grounds. Where an extradition bar can be established without proving a political purpose, it should be examined independently rather than making an evidentially stronger argument depend on a disputed general characterisation of the case.

A refusal of extradition must be reported with its grounds. A refusal based on political risk, insufficient documentation, a procedural defect or another obstacle has different implications for subsequent analysis. It is useful to obtain the complete reasoned decision, check whether it is final and distinguish the principal reasons from additional observations. A press release announcing an “extradition victory” does not establish either the legal test or which assertions the court accepted.

5. International protection and current EU law

For international protection purposes, an economic charge creates no presumption either of ordinary prosecution or of political persecution. The UNHCR Handbook distinguishes criminal liability from persecution, drawing attention to excessive punishment, discriminatory application of the law and the use of a charge as a pretext. It is official interpretative material, rather than an independent rule displacing the requirements of the Refugee Convention or applicable regional legislation. [3, §§ 56-60, 80-86]

At the report's cut-off date, Regulation (EU) 2024/1347 must be taken into account in states bound by that instrument. It became applicable on 12 June 2026: the date of 1 July 2026 originally published in Article 42 was corrected. References solely to Directive 2011/95/EU as an unchanged general regime applicable in September 2026 are therefore insufficient. In an individual application, temporal applicability, the state's participation and procedural rules must also be checked; this report does not resolve every transitional situation. [4; 15-16]

Article 9 of the Regulation connects persecution with a sufficiently serious violation of basic rights or an accumulation of measures of comparable severity. Possible forms expressly include discriminatory legal and procedural measures, disproportionate or discriminatory prosecution or punishment, and denial of judicial redress resulting in such punishment. An ordinary investigative error and persecution within the meaning of asylum law are therefore not equivalent. Analysis must demonstrate the required seriousness and connection to a ground for protection. [4, Art. 9]

Political opinion is understood by reference to potential actors of persecution and their policies or methods; the applicant need not already have acted upon those views. This permits examination of the political significance of resistance to corrupt pressure without confining the inquiry to party membership. A proprietary interest does not, however, dispense with the need to establish causation: why does the alleged persecutor perceive the conduct as political resistance rather than merely an obstacle to obtaining money? [4, Art. 10; 5]

Articles 6 and 7, concerning actors of persecution and protection, are also important in practical analysis. Where pressure originates with private individuals, the ability and willingness of the relevant actors to provide protection, its effectiveness and its accessibility must be examined. The word “connections” proves nothing by itself. Evidence is required of specific contacts, interference in proceedings, responses to complaints and the mechanism through which public powers are used. A direct written instruction is not indispensable, but the causal account must rest on verifiable circumstances. [4]

Finally, a fear of persecution does not remove the need to examine exclusion grounds. Article 12 of the Regulation requires a separate assessment, including in relation to a serious non-political crime where the conditions of the provision are met. Not every economic charge can be declared a ground for exclusion; equally, specific information about individual responsibility cannot be ignored by invoking opposition status. Protection against return, recognition as a refugee and assessment of criminal liability are related but separate legal questions.

6. P.I.: protecting a business and attributed political opinion

The Court of Justice's judgment of 12 January 2023 in Case C-280/21, P.I., is important where an applicant does not base the argument on public party-political activity. In paragraph 40, the Court explained that political opinion within Article 10(1)(e) and (2) of Directive 2011/95 may encompass attempts to defend personal material and economic interests by legal means against non-State actors acting illegally. Relevant elements include those actors' corrupt connections with the state, enabling them to exploit its criminal punishment machinery against the applicant, and their perception of the applicant's attempts as opposition or resistance to those actors, their policies or methods. [5]

This is a conditional legal construction, not a rule that “every corporate dispute equals political persecution”. It contains several verifiable connections: unlawful conduct by a private actor; the ability to engage state coercion; the applicant's legal defence of personal interests; perception of that defence as resistance; and the use of punitive machinery in that context. If a link is missing, the gap requires explanation and may alter the legal characterisation. The size of the business, the opponent's wealth or acquaintance with an official does not fill an absent link.

For an evidential dossier, this means examining the response to resistance. For example, the content of a threat following court proceedings or a refusal to sign an agreement may be legally material if it shows that the actor connects non-compliance with their position and ability to mobilise criminal action. A hypothetical threat in this report is not, however, an established fact of any case. To use actual material, the original record, attribution to its author, date, full context and an explanation of its connection to the subsequent measure are required.

A political characteristic may be attributed to a person irrespective of whether that person regards themselves as a political activist. The absence of a party membership card therefore does not end the analysis. At the same time, an applicant's self-description as “fighting the system” does not replace evidence of the alleged persecutor's perception. Methodologically, the focus shifts from the individual's declaration to the mechanism of the threat and the causal connection. This is especially important where economic, personal and public-power interests are intertwined.

The 2023 judgment interpreted Directive 2011/95, not the later Regulation 2024/1347. Using it in an analysis as at 2026 requires comparison of the corresponding provisions rather than silently substituting one instrument for the other. Article 10 of the new Regulation retains the construction of political opinion relating to actors of persecution, their policies or methods, making the interpretation an important point of reference. Application of the new regime to a particular case nevertheless remains a legal question for the relevant proceedings. [4-5]

The source is deliberately used narrowly in this report: the analysis concerns the verified operative formulation in paragraph 40. It does not assert that the Court of Justice itself granted asylum, established the guilt of particular officials or finally resolved all the facts of the domestic dispute. A preliminary ruling on the interpretation of a provision must be distinguished from subsequent fact-finding by the competent body. That distinction makes it possible to use the case as a methodological reference without overstating its outcome.

7. Merabishvili: mixed purposes and change over time

In Merabishvili v. Georgia, decided on 28 November 2017, the Grand Chamber of the ECtHR formulated an approach to restrictions pursuing both a permitted and an ulterior purpose. The mere presence of an extraneous interest does not automatically establish a violation of Article 18. The predominant purpose must be identified by assessing the circumstances as a whole. Where a restriction continues over time, that assessment may change: an initially legitimate purpose does not ensure that the measure is used legitimately throughout its duration. [6, §§ 303-308]

This approach guards against two opposite errors. The first is to assume that reasonable suspicion excludes misuse of detention. The second is to assume that any political advantage for the authorities automatically turns the measure into an Article 18 violation. The Court examines not an abstract possibility of benefit, but what actually determined the restriction in the particular situation. In economic cases, this requires separate assessment of the basis for the investigation and the purpose served by the specific coercive instrument.

In Merabishvili, the general political context was not accepted as sufficient proof that detention predominantly served to remove the applicant from the political scene. Prosecution of former senior officials admitted of another explanation: accountability for alleged wrongdoing that had not previously been investigated. Nor did the Court equate shortcomings in the reasons for extending detention with independent proof of a political purpose. These negative findings are an essential part of the judgment's methodology. [6, §§ 320-328]

A different conclusion concerned the specific episode in which the applicant was secretly removed from his cell to obtain information about Zurab Zhvania's death and Mikheil Saakashvili's bank accounts. The Court assessed the combined witness evidence, objectively verifiable circumstances, omissions in the investigation and the state's explanations. It concluded that the predominant purpose of the restriction had changed over time: from investigating suspected offences to obtaining that information. It found a violation of Article 18 taken in conjunction with Article 5(1). [6, §§ 335-354]

On proof, the Grand Chamber rejected a special rule confining analysis to direct evidence of an ulterior purpose. The Court's ordinary approach applies, including sufficiently strong, clear and concordant inferences from circumstances. Its expression “beyond reasonable doubt” must not automatically be equated with a domestic criminal standard. The Court examines the entire material and takes account of situations where the necessary information is exclusively in the state's hands. [6, §§ 309-317]

The practical conclusion is to construct a chronology not only of the charge but also of the function served by the measure. It is necessary to establish when the extraneous demand arose, which grounds for the restriction remained at that time, who could promise to discontinue or relax the proceedings and what followed a refusal. Even persuasive evidence of pressure during a particular period does not justify treating every preceding act as part of a single design without further analysis. A precise temporal boundary strengthens rather than weakens the conclusion.

8. Gusinskiy: criminal coercion as commercial leverage

In Gusinskiy v. Russia, decided on 19 May 2004, the ECtHR examined the use of deprivation of liberty in the context of a transfer of a media business. For this inquiry, it is important not to reduce the case to the applicant's well-known political surroundings. The Court examined the documentary connection between discontinuance of the criminal proceedings and the agreement to sell Media-Most to Gazprom, as well as the Minister for Press and Mass Communications' participation in the arrangement. [7, §§ 70-78]

The Court did not proceed on the basis that the original suspicion was entirely absent. In its Article 5 analysis, it considered the reasonableness of suspicion and the lawfulness of detention separately. Under Article 18, the decisive feature was an arrangement in which criminal proceedings and detention were used as a means of commercial bargaining. The connection was supported by more than the applicant's assessment: the agreement, state involvement and the subsequent procedural decision linked to the transfer of shares mattered. [7, §§ 52-55, 69, 75-78]

A strong but limited conclusion follows. An improper purpose may be established through a coherent sequence of official and commercial acts. The commercial function of the restriction established by the Court must not, however, be replaced by every political assertion made by the applicant. Applying an asylum ground based on political opinion or a particular extradition bar requires the additional connection demanded by the relevant provision.

Practical examination of a comparable situation should address the substance of the proposed exchange. What was required: compensation for documented loss through a statutory procedure, a voluntary settlement, transfer of control to an unrelated beneficiary or abandonment of public activity? Who formulated the condition, and could that person influence the proceedings? Was the demand recorded before the concession? Did the promised procedural consequences correspond to what actually occurred? These questions distinguish suspicious coincidence in timing from an established mechanism of coercion.

Nor can every restitution arrangement or compensation agreement be declared unlawful pressure. Domestic legal systems may provide legitimate consequences for making good harm. The specific legal basis, voluntariness, subject of the transaction, role of public officials and connection between the preventive measure and an extraneous interest are what matter. An asset transferred through lawful enforcement of a judgment presents a different starting point from a private transaction imposed through detention.

For financial analysis, it is useful to examine the value of the asset transferred, the structure of control and the ultimate beneficiary separately. A market valuation does not replace proof of the purpose of state coercion. Even an unfavourable transaction may have an ordinary commercial explanation; even a transaction at a fair price may be accompanied by an impermissible restriction of liberty. The legal and economic analyses must therefore test different links in the same account while preserving the independence of their conclusions.

9. Kezerashvili: a procedural violation does not prove an ulterior purpose

Kezerashvili v. Georgia, decided on 5 December 2024 and final on 5 March 2025, is an important counterweight to overbroad conclusions. The applicant had links to Georgian political life, held public office and subsequently had a connection with a television channel critical of the government. The proceedings under examination concerned an economic charge. The political background did not, however, predetermine the assessment of each Convention argument. [8]

The ECtHR found a violation of judicial impartiality because a judge who had previously served as Prosecutor General during the relevant period participated in deciding the case. That finding concerns the specific circumstances and does not establish that every former prosecutor is automatically disqualified from every criminal case. In other aspects of its fairness assessment, the Court did not regard its role as a basis for determining the criminal dispute afresh in place of the domestic courts. [8, section concerning Article 6]

It is particularly significant that the Article 18 complaint was declared manifestly ill-founded and therefore inadmissible. It would be incorrect to report that outcome as a separate judgment on the merits finding no violation of Article 18. The Court emphasised that the established lack of impartiality did not in itself prove an ulterior purpose, and that the broader political context did not confer immunity from criminal prosecution. The evidential connection required independent substantiation. [8, §§ 128-133]

The judgment also discusses refusals of extradition in France and the United Kingdom and deletion of INTERPOL data. This report uses those circumstances only as described by the ECtHR; it does not claim independent verification of the full foreign decisions. The Court did not treat those outcomes as automatic proof that the domestic proceedings before it pursued a prohibited purpose. Differences in the subject and direction of the assessment remained important. [8, § 129]

Another useful aspect is the assessment of a political leader's public statement. An isolated phrase, particularly when separated from the discussion and subsequent clarification, does not necessarily substantiate an instruction to a court or a causal connection with a conviction. Temporal proximity between a statement and a decision likewise requires additional evidence. The methodological lesson is to read the complete transcript, identify the addressee and examine powers, rather than turn an emotionally compelling quotation into independent proof of interference. [8, §§ 67-71, 132]

Kezerashvili does not establish the absence of political abuse in all proceedings against the applicant or in the country generally. Its significance is narrower and more useful: it identifies transitions from fact to conclusion that may be insufficiently substantiated. A violation of the right to a fair hearing requires a remedy in its own right, irrespective of the success of a political argument. A professional memorandum should preserve the established violation while candidly identifying the further conclusion that could not be drawn from it.

10. INTERPOL: the legal framework and the scope of CCF review

Article 3 of INTERPOL's Constitution prohibits intervention or activities of a political, military, religious or racial character. Article 2 connects police cooperation with applicable laws and the spirit of the Universal Declaration of Human Rights. For data processing, these requirements are elaborated in the Rules on the Processing of Data, referred to below as the RPD. Review of political character and review of respect for fundamental rights are connected but must not be collapsed into one another. [9-11]

Article 34(3) RPD requires consideration of all relevant information and lists seven factors: the nature of the offence, including the charges and underlying facts; the status of the persons concerned; the identity of the data source; the position of another National Central Bureau or international entity; obligations under international law; implications for the Organisation's neutrality; and the general context. This is not a table of fixed weights. Its application requires assessment of the particular case rather than a count of political indicators. [10]

An economic classification does not itself answer the Article 3 question. The factual substance of the request must be examined: precisely what conduct is alleged, which transaction is described, what role is attributed to the individual, when the acts occurred and how they connect to loss or benefit. At the same time, public office, an opposition connection or a public dispute does not eliminate the ordinary criminal content of specific facts. Published CCF decisions examine these elements together. [12-13]

The object of an application must be identified correctly. A Red Notice, a diffusion and an entry concerning a document in the SLTD database differ in purpose and applicable requirements. An argument directed against an international wanted-person alert must not be mechanically transferred to a dispute about a passport's status. In each case, it is necessary to identify the data processed, the source authority, the alleged legal or factual defect and the correction sought. CCF decision 2024-03 specifically illustrates an SLTD dispute. [14]

CCF review does not replace determination of criminal guilt or domestic extradition proceedings. This is expressly reflected, for example, in decision 2023-04. Sufficiently specific information about possible involvement for data-processing purposes is not equivalent to proof of a charge in a criminal court. Correspondingly, deletion of data must not be publicly described as an acquittal, cancellation of a domestic warrant or a universal prohibition on any later legal proceedings. [13, § 39]

Practical argument should connect the political submission with scrutiny of the quality of the facts. Where information describes only a person's office rather than alleged conduct, specificity is a separate issue. Where conduct is described in detail, it must be answered rather than replaced with a general country survey. Where an ulterior purpose is identified, its effect on compliance with INTERPOL's processing rules must be explained. This approach avoids overloading Article 3 with arguments more accurately addressed under other requirements.

11. Published CCF decisions: what strengthens and weakens the argument

In published excerpt 2019-09, the CCF considered arguments concerning political character and the private nature of the dispute. The association with the former administration of an applicant who held a senior management position in a state-owned company was not considered sufficient in itself. The Commission took account of the facts describing alleged personal involvement, the economic component and information about possible personal benefit. Political elements were not considered predominant. [12, §§ 25-31]

The decision is important for distinguishing management status from a political role. Appointment under a particular government may explain context without automatically establishing persecution for loyalty to that government. A stronger conclusion would require individualised evidence of targeting, pressure, the nature of the acts or a connection between prosecution and a specific political position. At the same time, accusations presented by the National Central Bureau remain accusations: the CCF does not turn them into a criminal conviction through its decision.

In excerpt 2023-04, the applicant denied involvement in an organisation's activities and relied, among other things, on the absence of a formal connection in registration records. The National Central Bureau described alleged de facto leadership, financial decision-making and movements of funds, referring to documents and other material. The CCF considered the information sufficiently specific to establish possible involvement within the limits of its mandate. The absence of a name from a register was not accepted as a complete answer to an account of de facto management. [13, §§ 28-39]

Methodologically, this means that formal corporate status and actual role must be examined separately. A defence may challenge specific instructions, access to accounts, receipt of benefits and the reliability of testimony. Denial of one registration feature does not automatically refute the entire financial account. Conversely, the assertion that someone was a “de facto manager” also requires particulars: it must not become a general label used to replace missing facts.

In the same decision, the CCF did not consider general assertions of risk arising from nationality, inter-state relations and criticism of foreign policy sufficient. The Commission considered the Bureau's specific explanations of procedural complaints. It was separately established that the residence document submitted did not demonstrate the international protection status on which the applicant sought to rely. This illustrates the importance of describing immigration documents accurately in legal terms and avoiding the assumption that any right to remain amounts to recognition of political persecution. [13, §§ 17-19, 35-43]

Excerpt 2024-03 concerned an SLTD entry for a cancelled passport. The Commission compared the applicant's explanations with the legal and procedural grounds supplied by the Bureau. General material about conditions in the country did not fill the absence of specific information about misuse of INTERPOL's channels in that situation. This does not mean that country information is irrelevant generally. The narrower conclusion is that it must be connected to the particular person, entry and alleged breach. [14, §§ 11-16]

12. INTERPOL's Repository: comparing contrasting examples

The official Repository of Practice on Articles 2 and 3, third edition of November 2024, contains illustrations of the Organisation's practice. It is a useful interpretative source, but not a collection of fully published judicial cases. Anonymised examples do not permit independent reconstruction of all the evidence or verification of the domestic history. They are used here to compare the reasoning applied, without identifying the individuals or states concealed in the publication. [11, section 3.1]

In one example, allegations against a former president concerned economic policy and alleged harm to the treasury, against a background that included an unconstitutional change of government and without information about personal benefit. INTERPOL assessed the case as political. In other examples, corruption and illicit enrichment allegations against former senior officials retained an ordinary criminal character. These differences show why the factual substance matters more than the single feature “former head of state”.

The comparison does not mean that absence of personal enrichment always excludes an economic offence. Under many possible legal constructions, unlawful conduct may benefit a third party or occur without personal profit. Absence of benefit is therefore only one element of a wider examination: is a specific unlawful act alleged, or is a political-economic decision itself being retrospectively recast as a crime? How does the allegation relate to the powers then in force, the procedure followed and actual loss?

Another Repository example concerns an opposition municipal leader and charges arising in the context of a refusal to resign. A combination of circumstances mattered, including the sequence of events and the positions of international actors. It does not yield a universal rule that every case following a refusal to resign is political. It does, however, show how a specific demand and subsequent procedural activity can form a verifiable causal account.

By contrast, the Repository includes an example of financial allegations connected with political financing in which the ordinary criminal element was considered predominant. The fact that money relates to political activity does not exclude investigation of its origin or use. Punishment for lawful support of a political party must be distinguished from prosecution of a specific alleged misappropriation, forgery or other prohibited transaction. A political purpose for spending funds does not automatically legitimise the means of obtaining them.

The practical value of comparison lies in asking reciprocal questions. Which facts distinguished an ordinary financial charge from punishment for a political decision? What substantiated the individual's role? Was an extraneous demand documented? Which international positions actually concerned the individual? Answers should be sought in the material of the case under examination, rather than by selecting the most similar biography from the Repository. Analogy is useful only after legally significant differences have been tested.

13. Chronology: from a sequence of events to causation

Chronology is indispensable, but its persuasiveness is often overstated. The formula “first the dispute, then the criminal case” shows sequence, not necessarily causation. Between those events there may have been a new complaint by a victim, an audit, discovery of documents, a change in witness availability or another explanation. Professional examination must include these intervening events even where they complicate the initial hypothesis.

For every episode, at least three dates should be recorded: the date of the act itself, the date of its documentation and the date when the relevant actor learned of it. A charge concerning an old transaction does not necessarily mean that the authorities had long possessed the necessary information. Conversely, if a full set of materials had been held by the competent body for years and activity resumed immediately after a political dispute, the explanation for the delay becomes a more substantial question. Both possibilities require documents rather than assumptions.

It is useful to maintain two parallel timelines: economic and procedural-political. The first records contracts, payments, corporate decisions, audits and the occurrence of loss. The second records public activities, threats, requests for protection, changes in office-holders and coercive measures. Comparison reveals any actual point of intersection. If the timelines simply sit alongside each other without an explanation of the mechanism, visual clarity does not make them proof.

Merabishvili refines this approach: the inquiry concerns not only the beginning of a restriction but also a change in its function. The point at which an extraneous demand arose and the condition of the legitimate grounds for the measure at that same point should be recorded separately. In an economic dispute, this might be a shift from investigating a transaction to compelling the surrender of an asset or information about third parties. Such scenarios remain hypotheses in a working model until substantiated by evidence. [6]

Events that test the hypothesis in the opposite direction are particularly important. Did the investigation continue after political reconciliation? Were measures discontinued after an asset transfer? Were they applied to members of the same group who complied with the alleged demand? Are there facts incompatible with the proposed causal account? The researcher should actively look for them. A model that explains every event in the same way and cannot be falsified ceases to be testable.

The conclusion of chronological analysis should be proportionate to the evidence. “Temporal association is established; the mechanism of influence is not substantiated” is a legitimate and useful result. A stronger conclusion is possible where sequence combines with an express condition, documented access to the procedural decision and actual fulfilment of the promise. There is no need to force a choice between categorical rejection and categorical acceptance of political motivation when the evidence supports an intermediate conclusion.

14. Selectivity: choosing genuinely comparable cases

An allegation of selective prosecution requires identification of the people with whom the applicant is compared. Participants in a single transaction may have different roles, possess different information, receive different benefits or cooperate with investigators. Comparison solely by office, sector or business size is insufficient. It must be explained why the selected individuals are genuinely comparable in circumstances material to the application of criminal law and the coercive measure.

A working comparison should describe each person's alleged conduct, powers, period of participation, available information about the evidence, procedural status and known explanation for the difference. Political affiliation is included as a separate characteristic rather than used as the sole selection principle. If the comparator group consists only of publicly known opposition figures, the inquiry excludes in advance cases that might disprove the hypothesis.

Absence of information about proceedings against another participant is not equivalent to an established absence of investigation. The investigation may be non-public, at a different stage or part of separate proceedings. A distinction should therefore be drawn between “it has been verified that the measure was not applied”, “the available material contains no information” and “the information is inaccessible”. Only the first formulation permits confident reliance on absence of a measure as a fact; the others describe limits of knowledge.

A substantiated hypothesis of selectivity arises where similar conduct is treated differently, no objective explanation is found and the difference is consistently connected to a protected characteristic or an extraneous demand. Even that hypothesis must be related to a specific provision. For asylum, the connection between persecution and the relevant ground matters; for Article 18, the purpose of the restriction; for the CCF, assessment of processing in light of the facts and context. The same comparative material may serve different functions.

Merabishvili warns against a simple inference from numerous prosecutions of representatives of the former government. Such a pattern may reflect either political reprisals or investigation of wrongdoing that previously could not be examined. The Court also considered decisions favourable to individual accused persons, preventing the general account from absorbing contrary facts. Researchers should accordingly include releases, refusals to order detention and acquittals where they relate to a comparable context. [6, §§ 322-328]

This report calculates neither the proportion of selective prosecutions nor national rankings. Such work would require a defined population of cases, reproducible inclusion criteria, information about participants who were not prosecuted and control for differences. Publications about individual high-profile cases do not provide that foundation. Qualitative comparison remains possible, but its result must not be presented as a statistically established systemic pattern.

15. Threats, public statements and the connection to a state decision

A direct statement may substantially strengthen proof of purpose where its meaning and source are accurately established. Political appraisal, a promise of a lawful investigation, a premature assertion of guilt and a conditional threat must be distinguished: take a particular action or face criminal measures. These forms have different significance. Harsh rhetoric may matter for other legal questions without necessarily demonstrating actual direction of a particular procedural decision.

Initial verification includes the recording or authentic text, date, audience, complete context, translation and subsequent clarifications. A short video clip, a journalist's retelling or a quotation without the surrounding sentences should be marked as a limited source. If translation changes modality, for example by turning a supposition into a promise or a political wish into an instruction, the legal conclusion may rest on an editorial error.

The next question concerns the capacity to influence. The speaker's office matters, but does not replace examination of their powers and actual connection to the body that made the decision. A private competitor may threaten to use connections that do not exist. A senior official may comment on a case without determining its judicial outcome. A stronger causal account requires additional circumstances: substantiated contacts, coordinated action, access to non-public information or fulfilment of a previously stated condition.

In Kezerashvili, the ECtHR examined the context of the statement and did not consider it, together with temporal proximity, sufficient to establish an ulterior purpose. This does not make public statements insignificant. It shows that their weight depends on content and connection to the particular measure. In Merabishvili, by contrast, the demand's substance was considered together with the circumstances of the secret meeting, the ability to discontinue proceedings and the authorities' conduct after the event. [6; 8]

When working with testimony about an oral threat, it is necessary to assess separately when it was first recorded, to whom it was reported, whether the account remained consistent and what independent information is available. A witness's dependence on the applicant does not automatically make their information false; a connection to a public authority does not automatically make it reliable. Opportunity to observe, accuracy of recollection and consistency with objective documents are examined. The absence of an audio recording must not become an automatic refusal to assess other evidence.

Finally, publicity surrounding an accusation may cause reputational damage without an established political purpose. If the applicant complains of a violation of the presumption of innocence, that question should be identified separately. Combining all complaints into a single allegation of a “politically commissioned case” makes examination harder: the recipient is asked either to accept an overbroad conclusion or to reject substantiated narrower violations along with it. Separating claims produces a more precise evidential position.

16. The economic basis of the charge and alternative explanations

Assessment of a political argument must not bypass the financial component. It is necessary to identify precisely what the prosecution alleges: lack of an actual delivery, diversion of funds, concealment of income, abuse of powers, fictitious documentation or another specific mechanism. The terms “loss”, “benefit” and “control” need explanation. A company's loss is not equivalent to misappropriation; participation in management does not establish knowledge of every transaction; absence of a formal position does not exclude de facto management.

The first task is to separate substantiated movements of funds from their legal interpretation. A bank statement may establish a transfer without, by itself, establishing its criminal purpose. A contract confirms a stated basis but not necessarily actual performance. An expert report contains conclusions within the limits of the data supplied and the methodology used. For each link, the analysis should identify what the document establishes and what additional assumption is required for the prosecution or defence account.

CCF 2023-04 shows why reliance on registration records to deny a connection to a company may be insufficient against a specific account of de facto management. The converse inference is also limited: a detailed account from a National Central Bureau does not relieve the researcher of checking whether it distinguishes direct observation, testimony from interested persons and expert inferences. An external body may have a limited mandate and may not resolve every substantive contradiction. That must be considered when reporting its decision. [13]

In assessing expert material, it is useful to examine the source of the underlying data, completeness of the period covered, currency, method of calculating loss, treatment of counter-performance and alternative scenarios. Financial uncertainty must not be presented as established fabrication. A calculation error may be made in good faith; disagreement between experts may concern an acceptable methodology. A stronger abuse argument arises from documented substitution of data, disregard of known rebuttal material or use of knowingly incomparable quantities, provided those circumstances are actually established.

Retrospective criminalisation of a management choice requires particular attention. A decision that later produced a loss must be assessed by reference to the information available when it was taken, the powers held, the procedure and applicable law. An invocation of business risk nevertheless confers no immunity from investigation of alleged deception or misappropriation. The correct question is which specific unlawful act is alleged beyond the adverse outcome and what supports the relevant element.

The alternative account should be presented in its strongest form consistent with the documents. If the prosecution can be explained by a new audit, discovery of concealed payments or complaints by independent victims, those facts should be included. The political hypothesis is assessed after that comparison. Research integrity consists not in neutralising every adverse fact, but in explaining which facts the hypothesis withstands, which require clarification and which contradict it.

17. Procedural violations and exploitation of vulnerability

A breach of a procedural guarantee and an ulterior purpose are different propositions. Denial of access to material, inadequate reasons for detention, impartiality problems or late notification may have independent legal significance. A political characterisation nevertheless requires an explanation of how the defect connects to the alleged motive. Kezerashvili and Merabishvili show that even an established violation does not always support the additional inference about purpose. [6; 8]

It is useful to distinguish an isolated error, persistent asymmetry and instrumental use of procedure. An isolated defect may be remedied and reveal no intention. Asymmetry calls for comparison: are the parties' applications treated alike, is key evidence accessible, and are refusals reasoned? Instrumental use entails a more definite connection: the restriction becomes a condition for meeting an extraneous demand, such as transferring property or providing information unrelated to the permitted purpose of the measure.

Analysis of detention requires reconstruction of successive decisions and their grounds. Repetition of a standard formula may be a procedural problem without itself proving political pressure. Its evidential significance increases where extraneous demands arise at the same time, previously asserted risks disappear and release is made conditional on conduct unrelated to securing the proceedings. The conclusion must still concern the particular period rather than automatically cover the entire history of the case.

Pressure on relatives, employees and business partners also requires individualisation. The inquiry must establish which measures were applied, their official grounds, whether those people were connected to the alleged transaction and whether a condition addressed to the principal applicant was formulated. Several proceedings within one business group may be explained by a common financial scheme. The pressure hypothesis becomes stronger where specific evidence shows that those measures were used to secure an extraneous concession.

Information about unavailable evidence must be described precisely. “Not publicly available”, “not disclosed to the defence” and “does not exist” are different assertions. State control of a document may affect evidential assessment in a particular procedure, but does not entitle a researcher to fill the gap with invented content. Merabishvili permits inferences from the state's conduct and the combination of circumstances within the ECtHR's approach; it is not a universal licence to treat every unsupported accusation as proved. [6, §§ 311-317]

The final memorandum should preserve independent procedural grounds for protection even where the political purpose is insufficiently substantiated. This matters practically: a dispute about motive must not divert attention from a verifiable violation for which a specific remedy is available. A narrower but well-supported claim may have a sounder legal basis than a general account embracing numerous disparate events without an established connection.

18. Transferring decisions between procedures and assessing sources

Another body's decision is important material, but its significance depends on its subject, reasons, evidence and procedural status. The complete text should be obtained, and the date, finality and basis of the outcome established. If only the operative part is available, the result may be stated confidently within its limits, but absent reasons must not be attributed to the body. Confidentiality does not turn the holder's assertion about a decision into verified content.

Circular corroboration is particularly dangerous. An applicant tells a journalist a story; the article is cited in an expert letter; the letter is attached to an application; a later decision mentions the material submitted. Four documents may derive from one original assertion. An evidence map should therefore show where information originated, rather than merely the number of references. A source's independence is determined by how it obtained the fact, not by the institutional status of the person retelling it.

When using an asylum decision, the established ground of protection must be distinguished from other possible grounds. Status may have been granted on circumstances unrelated to the particular economic charge. Where reasons are unavailable, that limitation must be retained. Likewise, an extradition refusal may rest on an obstacle unrelated to political purpose. INTERPOL data may be deleted on different regulatory grounds. The most favourable explanation among several possibilities cannot be selected without a substantiating text.

Kezerashvili shows that even known favourable outcomes do not remove the need for independent proof before the ECtHR. This does not mean that they have no evidential weight. They may substantiate particular circumstances, disclose a risk or identify material already examined. The submission must specify which proposition is being transferred and why it is relevant to the present question. A decision's legal effect and factual persuasiveness are related but not identical characteristics. [8, § 129]

Anonymised CCF practice requires additional caution. Publication of an excerpt substantiates the approach and result described within the available limits. It does not disclose the entire confidential exchange between the parties, allow authentication of every domestic document or justify identifying the case with a known public story. Comparison should therefore be based on legal characteristics rather than guesses about the applicant's identity.

For editorial work, it is useful to label each proposition as a rule, a body's finding, a party's assertion, a documented event or the author's assessment. The labels may remain in the working register, but the distinctions must be visible in the language of the final text. “The Bureau alleged”, “the Commission considered sufficient for processing” and “the criminal court found” are not interchangeable. Disciplined attribution protects an analytical report against an unnoticed transformation of one party's account into an established fact.

19. A verifiable system of indicators without numerical scoring

The proposed system consists of lines of inquiry, not conditions that automatically constitute political persecution. Each line should conclude with four entries: substantiated information; its connection to the applicable rule; the strongest alternative explanation; and missing material. If the researcher cannot complete at least the first or second entry, the indicator remains a reason for further inquiry rather than a proved element of the conclusion.

The first line concerns political role or attributed opinion. Conduct, public statements and the alleged persecutor's perception of the person are examined. The checking question is whether the characteristic explains the choice of measure or merely describes a biography. The second concerns an extraneous demand. The condition's content, author, capacity to influence and subsequent fulfilment are examined. The checking question is whether the alleged pressure is instead a lawful compensation procedure or another permissible procedural act. [5-8; 11-12]

The third line concerns chronology and change of purpose. The dates of obtaining evidence, onset of the dispute, emergence of the demand and extension of restrictions are examined. Alternatives may include late discovery of a transaction or a change in procedural risks. The fourth concerns selectivity. Comparable people, roles and decisions are examined; verified information about the absence of proceedings is identified separately. Political difference must not replace criteria of comparability. [6]

The fifth line concerns the factual foundation of the economic charge. Specific acts, powers, movements of funds, alleged benefit and the quality of financial expert analysis are examined. The checking question is whether the account of the actual role has been rebutted or only formal status. The sixth concerns procedural asymmetry and exploitation of vulnerability. Restrictions, reasons, access to a defence and the connection to a demand are examined. The checking question is whether an ulterior purpose is substantiated or only an independent procedural defect. [7-8; 12-13]

The seventh line concerns the source and subject of the international request. Competence, the type of entry, factual description and applicable requirements are examined. The eighth concerns external decisions and context. Reasons, finality, independence of the underlying information and relevance to the present issue are examined. The checking question is whether several documents reproduce a single unsubstantiated report and whether another body's legal test is being transferred without justification. [8; 10; 14]

The system allows differentiated outcomes. A serious procedural violation may be substantiated while information about political purpose remains insufficient. A specific political risk may exist alongside a factual foundation for the charge. There may be inadequate particulars for INTERPOL processing without a conclusion of innocence. The available material may support an ordinary investigation more strongly than an abuse hypothesis. Qualitative analysis must preserve all these possibilities; otherwise it becomes an instrument for confirming a predetermined position.

No indicator receives a fixed weight. One authentic document recording an exchange of a concession for termination of a restriction may be more informative than dozens of general publications. Several concordant pieces of circumstantial evidence may carry considerable weight without a direct admission of purpose. Neither the volume of material nor rhetorical persuasiveness replaces the legal threshold. The final conclusion should explain why the combination is sufficient for the selected procedure, or identify the additional information required.

20. A practical analytical protocol and hypothetical scenarios

Work should begin with a concise procedural profile: the individual, state, stage, contested measure, applicable ground and requested result. A neutral account of the economic charge should then be prepared, one that its initiator could recognise as accurate in substance even though the defence disputes its validity. This prevents analysis of an oversimplified account. Only then should the improper-purpose hypothesis and the circumstances capable of supporting or disproving it be formulated.

The next stage is a register of primary material recording dates, origin, language and access limitations. For every material sentence in the prospective submission, it should be clear whether it is supported by a rule, judicial finding, financial document or participant's assertion. Translated passages are checked against the original; “charge” is not replaced by “conviction”, nor “sufficient information for processing” by “proved guilt”. Missing documents are identified separately.

After the chronology has been reconstructed, the alternative account is tested. The researcher should explain in writing which information most strongly supports the legitimacy of the investigation and which facts do not fit the pressure hypothesis. The material is then organised by legal procedure. A document may be relevant to several recipients, but its legal significance must be explained afresh. Extradition argument cannot simply be copied into a CCF application or substituted for assessment of asylum grounds.

Hypothetical scenario A: a former head of a state-owned company is prosecuted after a change of government; there is specific information about transfers for that person's benefit, but no threats, demands or comparable participants who have not been prosecuted. This model calls for examination of the financial evidence and procedural safeguards, but does not itself provide a sufficient basis for a political conclusion. Similarity to an opposition figure's biography does not remove the need to answer the specific charge.

Hypothetical scenario B: an entrepreneur sues an influential counterparty; a demand to abandon the claim and transfer a shareholding under threat of detention is then documented; the corresponding measures follow and are withdrawn after the concession. This combination requires especially careful verification of authenticity and the participants' connection to procedural decisions. If substantiated, it may support a finding that coercion was used improperly. A political characterisation for asylum additionally requires analysis of how resistance was perceived and of the applicable protection ground; it does not arise from proprietary pressure alone.

Hypothetical scenario C: a person obtains refusal of extradition and reports deletion of INTERPOL data, but the reasons are unavailable. The proper conclusion is confined to the substantiated outcomes and a request for the documents. It cannot be asserted that both bodies established political fabrication of the charge. Scenario D: a serious defect in judicial impartiality occurs, but no connection to an ulterior purpose is substantiated. The independent violation remains significant even if the political argument is not proved. These scenarios were created to explain the method and do not describe ARGA clients.

The final document should present facts in chronological order, the legal test, a comparison of competing explanations and a narrowly formulated result. A formulation that makes each inferential step checkable is preferable: the circumstance is established by this source; it relates to this element of the rule; the alternative explanation has been assessed for these reasons; the remaining limitation is not concealed. This makes the position suitable for critical reading and later revision as new material emerges.

21. Conclusions and recommendations

A verifiable assessment of possible political motivation requires discipline in three respects: precise selection of the legal question, separate analysis of factual foundation and purpose, and conscientious treatment of contrary information. The inquiry cannot begin with a universal status of “political case” and then search for a suitable procedure. It must first identify the restriction or decision being challenged and the legal outcome that is available.

The sources examined show that political context, office and temporal proximity are important but not self-sufficient. Evidence of the mechanism through which power is used provides a substantially more specific foundation: a documented condition, access to a procedural decision, a connection between the restriction and an extraneous interest, and consistency of subsequent action. A real economic component does not exclude misuse of an individual measure, while an established procedural defect does not always substantiate an ulterior purpose. [5-8; 11-14]

For submissions, it is recommended to maintain a single factual register while developing a separate legal explanation for each body. The register should distinguish parties' assertions from competent bodies' findings, record dependencies between sources and identify the translation version. The argument should address the strongest alternative explanation from the outset, and conclusions should state their temporal and substantive boundaries. Missing information must remain missing rather than be replaced by assumptions.

For research publications, avoiding pseudo-statistics is especially important. A purposive sample of high-profile decisions cannot establish the prevalence of political persecution, success rates of applications or a state's reliability as a percentage. Anonymised CCF excerpts permit study of approaches, not reconstruction of concealed cases. The proposed indicator system serves to test argument and is not presented as an official standard or an empirically validated prediction of outcomes.

Analysis should be updated when charges change, a reasoned external decision becomes available, new risk information emerges or the applicable law changes. A 2026 cut-off calls for particular attention to the reform of EU asylum law and corrections to official instruments. Historical decisions retain methodological value, but their normative basis must be identified. An older interpretation cannot be presented as a judgment given under an instrument that did not yet exist.

ARGA may use this method as a research framework for preparing verifiable analytical material. This is a recommendation of the report, not a statement about an implemented system, institutional powers or substantiated achievements of the organisation. The framework's practical value depends on whether it enables an independent reader to see the evidence, test causal connections and understand where established fact ends and assessment begins.

22. Sources

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Council of Europe - official text

[2] United Kingdom. Extradition Act 2003, section 81, Extraneous considerations. Current text; the official XML was also checked.
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[3] UNHCR. Handbook and Guidelines on Procedures and Criteria for Determining Refugee Status. Paragraphs 56-60 and 80-86. Official guidance, not an independent binding rule.
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[4] Regulation (EU) 2024/1347 of the European Parliament and of the Council of 14 May 2024. Articles 4, 6-10, 12, 15 and 21; Article 42 as corrected by [15-16]. EUR-Lex, CELEX 32024R1347.
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[7] ECtHR. Gusinskiy v. Russia, no. 70276/01, 19 May 2004, final on 10 November 2004, §§ 52-55 and 69-78.
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[8] ECtHR. Kezerashvili v. Georgia, no. 11027/22, 5 December 2024, final on 5 March 2025, particularly §§ 67-71 and 118-133 and the findings under Article 6.
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[9] INTERPOL. Constitution, Articles 2 and 3. Official legal documents page; the provisions are also reproduced in [11].
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[11] INTERPOL. Repository of Practice: Application of Articles 2 and 3 of INTERPOL's Constitution. Third edition, November 2024; section 3.1, particularly printed pages 23-25.
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[13] CCF. 2023 - Decision Excerpt No. 4: Purpose, Description of criminal activities, Political character. §§ 17-19 and 28-43.
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[14] CCF. 2024 - Decision Excerpt No. 3: Article 3, Misuse of Interpol's channels. §§ 11-16; the object of review was an SLTD entry.
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[15] European Parliament. Corrigendum to Regulation (EU) 2024/1347, TA-9-2024-0185-COR01, 17 June 2025, page 3: corrected application date of 12 June 2026.
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[16] Final publication of the corrigendum to Regulation (EU) 2024/1347: OJ L, 2025/90926, 25 November 2025, CELEX 32024R1347R(01). Publication details were checked against the official EUR-Lex record; the text correcting the date was also checked against [15].
EUR-Lex - OJ 2025/90926