ARGA Observatory Annual Report

Indicators of misuse of INTERPOL channels and safeguards in practice

19 November 2026

External edition. Applicant names are replaced with stable case labels. CCF, AF, DU and REV references are retained to make the cited correspondence traceable.

Purpose. This report consolidates the ARGA 2023–2025 analytical baseline, the expanded 2026 case analysis, the source and case register, and case correspondence located in the ARGA mailbox and CCF portal. It identifies what the record supports, what remains unverified, and which INTERPOL function could examine each proposed improvement.

Central question. On 7 May 2026, the CCF confirmed that ARGA material in the Applicant 01 matter had been transmitted to the General Secretariat for possible consideration in compliance checks. Can the applicant or representative receive a short notice confirming whether such material was considered and whether it led to a data correction, within the limits of permissible disclosure? ARGA proposes testing this in a pilot and tracking the time from referral to review.

ARGA Observatory | External edition

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How to read the evidence. “Documented” means a cited primary record was reviewed. “Applicant-reported” means the event is described in an ARGA or applicant submission but the underlying independent record was not available. “Pending” means no final CCF decision was located by the cutoff. Receipt, referral, review, data change and public mention are separate outcomes.

Names and identity details. Personal names are replaced by stable case labels. CCF, AF, DU and REV file references are retained at ARGA’s request. Applicant-only decision reasoning is not reproduced.

1. Executive findings

The 2026 record supports a narrow, answerable institutional question. On 7 May, the CCF confirmed that it had sent ARGA material in the Applicant 01 matter to the General Secretariat for information and action under its procedures so it could be considered in compliance checks. This proves

transmission, not completed review, a data change or policy uptake. The affected person cannot tell from the correspondence whether the material reached a responsible team or whether additional evidence is needed.

The record supports three bounded questions. First, can the General Secretariat confirm to a person or representative, within disclosure limits, whether a CCF referral was considered and whether it resulted in a data correction? Second, can the NDTF identify documented indicators that warrant additional questions before a notice is published or a diffusion reaches destination countries? Third, can the CCF make its reasons clearer about the decisive fact and potentially relevant new evidence under Articles 35, 38 and 42, where confidentiality permits?

A national consequence may persist after an INTERPOL record is corrected, but the reviewed 2026 files do not establish a complete, verified post-deletion incident. INTERPOL's public guidance says member countries should remove national copies after cancellation; a pilot should therefore measure actual receipt and implementation rather than assume an update.

The correspondence also shows the value of clear reasons and complete applicant evidence. In some files the CCF requested specific material, including proof that asylum proceedings had begun. This report assesses the explanation against the record actually submitted and does not infer inadequate reasoning from an adverse outcome alone.

Recommended measures. (1) The General Secretariat should test a referral-status pilot with categories for received, referred, reviewed, data changed or no change, record elapsed days, and provide a short non-confidential status notice where permissible. (2) The General Secretariat should assess whether it can confirm that relevant NCBs received and implemented a correction; existing deletion notices are not evidence of an actual national update. (3) The CCF should consider a concise statement of the decisive issue and the kind of new evidence that could matter for revision, consistently with confidentiality safeguards.

2. Scope and limits

This is the annual ARGA Observatory review covering material from the 2023–2025 report series and case-related activity located for calendar year 2026 through 18 November. It includes ARGA's own correspondence, selected records visible in the CCF portal sent box, public INTERPOL and CCF materials, selected judicial and international sources, and a limited secondary-source scan. The subject is alleged misuse of INTERPOL channels and safeguards against it, with attention to financial or commercial prosecutions where the evidence supports that context.

The email review searched the brave.arga@gmail.com mailbox for CCF, INTERPOL, case references, and known 2026 applicant names, then deduplicated message IDs. The resulting working set contained 162 messages, including duplicate forwards, automated portal notifications, no-reply messages, and unrelated or peripheral correspondence. It is a search yield, not a count of cases, people, or INTERPOL records. Outgoing messages and incoming replies were separately checked for selected files. The portal showed 13 sent submissions at the time of review; these are submissions, not 13 people or 13 distinct incidents.

Unit	2026 figure	Meaning / limit
Mailbox messages	162 unique message IDs	Targeted search yield; not unique cases or a prevalence denominator.
CCF portal submissions	13 visible entries	Submission count only; people and incidents may have multiple filings.

Unit	2026 figure	Meaning / limit
Working register	27 indexed person/case rows	Unique legal-matter total not certified; includes one separate Europol matter and unresolved references/identities.
Official CCF outcomes reviewed	3 documents	Two data-compliant decisions; one “no data currently recorded” access response. Referral is a separate process event.

The CCF portal was inspected in the currently authenticated session. The observations were read-only. Portal status and contents are not a substitute for a downloaded final decision, and status labels can change. The report therefore records portal details only as of the cutoff and marks a case “pending” when no final decision document was available in the material reviewed.

External coverage is strongest on official INTERPOL/CCF texts and public activity statistics. The external incident scan is not a comprehensive country-by-country census. It does not support country-level prevalence estimates or comparisons among requesting states. Open-source reporting can identify a lead or a public consequence but cannot establish what information was in INTERPOL’s system unless supported by an INTERPOL/CCF document, court record, or other primary source.

This external edition omits applicant names and applicant-only decision reasoning. The case and source register is included in Appendix A; file references are retained for traceability.

3. Method and definitions

We built a chronology for each selected matter using dated records: portal submission, CCF acknowledgment, requests for information, applicant response, hearing or arrest documents, national court action, and final CCF/General Secretariat letter where located. A date is not inferred from a forwarded email if the original message or attachment is missing. If an applicant reported an event and no independent document was available, that status is stated directly.

The working unit is explicit. A **person** is an individual subject. A **case** is a coherent legal and factual episode for that person, potentially spanning multiple jurisdictions. A **request** is one CCF application or formal procedural filing; one person may have access, deletion, and revision requests. A **record** is an INTERPOL Information System data item or notice/diffusion; its existence is not presumed from a national arrest warrant. A **consequence** is a separate event such as border questioning, detention, extradition proceedings, travel refusal, or continuing national restrictions. The same person can experience several consequences from one underlying case.

We coded evidence in four levels: A, official primary record (CCF/INTERPOL letter or decision, national judgment/order, official registry); B, corroborated primary documents from more than one source; C, applicant or representative account supported by partial records; D, secondary reporting without an accessible primary record. We separately marked whether a court decided extradition, whether the CCF or General Secretariat decided compliance, whether data were deleted, and whether a national authority changed its own records.

Deduplication used person, file reference, event date, requesting jurisdiction, affected jurisdiction, and described mechanism. Multiple articles about the same incident count as one incident. Distinct procedural consequences in the same file are recorded separately but not counted as separate people. If the channel is unknown, we do not classify the event as an INTERPOL notice or diffusion.

Reproducible deduplication example. Search results for the Hniot and Hasan episodes included multiple reports about the same underlying events. The editorial process grouped items by person, jurisdiction and event date, checked whether an official court or CCF record was available, retained one event row per episode, and marked the primary record as not retrieved where it could not be inspected. ARGA's editorial group remains responsible for case selection, source checking, calculations and conclusions.

4. The INTERPOL review architecture

INTERPOL's public description states that a Red Notice request is reviewed for compliance with its Constitution and Rules on the Processing of Data by the Notices and Diffusions Task Force, a multilingual and multidisciplinary team of lawyers, police officers, and operational specialists. Diffusions are circulated directly from one NCB to some or all member countries; wanted-person diffusions are also checked, but unlike Red Notices they may be received by destination NCBs before the review is complete. The difference matters when evaluating timing and exposure.

INTERPOL identifies the core legal frame as Article 2(1) of its Constitution, requiring activities to be conducted in the spirit of the Universal Declaration of Human Rights, and Article 3, prohibiting political, military, religious, or racial intervention or activity. Public materials also describe review against RPD Articles 82–99 for identity, judicial data, purpose, and other notice/diffusion criteria. These checks can include relevant external information, including status of the person and general case context.

The CCF has a separate role. It examines whether personal data in the INTERPOL Information System comply with applicable rules, and it handles requests for access, correction, and deletion. It does not decide guilt, overturn a national warrant, or control national databases. CCF decisions are final and are not subject to appeal; Article 42 allows revision based on a newly discovered fact that could have led to a different conclusion, submitted within the prescribed period.

Amendments adopted at the 93rd General Assembly in 2025 clarify that the CCF cannot review information exchanged directly between NCBs unless a serious violation of INTERPOL rules is reported and brought to the CCF's attention through the route provided to the General Secretariat. They also limit access to CCF-to-General Secretariat information to authorized staff and require notification to the CCF within 45 days where the General Secretariat has data about an applicant. ARGA has not established that any selected 2026 consequence arose solely from direct NCB-to-NCB exchange. The amendment is therefore an important scope issue, not an explanation to apply automatically to these cases.

For a policy proposal, the responsible actor must match the function: NDTF for pre-publication and diffusion review; General Secretariat units for compliance checks and national NCB follow-up; CCF for its Statute, information, and reasoned decision practice; member-state delegates for General Assembly work. A measure should not ask the CCF to police domestic proceedings beyond its mandate.

5. 2023–2025 baseline and comparability

ARGA's annual analytical report for 2023–2025 is the institutional baseline. The retained report describes approximately one hundred case files and a concentration of economic allegations in ARGA's CCF-related work. Those figures describe the organization's own caseload, not the global volume of INTERPOL notices or the share of any member country's submissions that are problematic. The published report does not provide a machine-readable case-level denominator in the material reviewed for this edition, so its counts must be verified against the case-level ARGA register before a percentage is repeated.

ARGA's sample is selected through casework and referrals. It is therefore a convenience sample, not a random sample of people subject to INTERPOL data. Cases that reach a legal-assistance organization may be more complex, more contested, or more likely to have cross-border consequences than ordinary notices. The sample can identify recurring process risks and testable questions; it cannot estimate national prevalence without a denominator for all requests by country, channel, and year.

The external comparator is INTERPOL's own 2024 CCF annual activity report. It records 2,586 new requests and 2,717 requests closed in 2024. Of 1,077 closed deletion requests, 703 were admissible requests submitted by applicants subject to data. In 164 of those, the source NCB or General Secretariat deleted data before a CCF decision. In the remaining 539 admissible deletion requests concerning applicants subject to data, CCF found the data compliant in 217 and not compliant in 272; in a further 50 the CCF could not reach a decision because of a total lack of NCB cooperation. This is a separate category and should not be relabelled as a merits finding of non-compliance. This comparison is about requests, not unique people or records.

The report also states that 30% of deletion requests took more than nine months and 70% of access requests more than four months. It notes rising case complexity and large supporting submissions as contributors to delay, while also describing measures to improve efficiency. These are organization-wide figures for 2024 and cannot be directly compared with ARGA's case duration without identical start/end definitions and case types.

ARGA will not pool the 2024 CCF statistics with its own sample for prevalence estimates. The two sources may be presented side by side to show scale and distinct denominators. Until the 2023–2025 case register is reconciled, the report carries the prior report's headline figures as provisional descriptions rather than verified totals.

6. 2026 case universe and status snapshot

The 2026 mailbox and portal contain matters at very different procedural stages. The record includes new requests, access requests, deletion requests, revision applications, supplementary evidence, and status inquiries. A single person may generate more than one submission; e.g., access and correction/deletion requests for the same person. The 13 portal submissions visible on the inspected date cannot be interpreted as 13 people.

The 2026 working register contains 27 indexed person/case rows, including one separate Europol data-protection matter; unresolved portal references and two unmapped identities mean the exact unique legal-matter count is not certified. Targeted mailbox searches returned 162 unique 2026 message IDs, not 162 cases. The CCF sentbox displayed 13 submitted portal entries, not 13 people or incidents. In the reviewed set, three official outcome documents were verified: two CCF decisions found the challenged data compliant (Applicant 10 and Applicant 09), and one access reply stated that no Russian-origin data were currently recorded (Applicant 11). The Applicant 01 transmission is a separate process outcome, not a merits decision.

Additional 2026 correspondence concerns Applicant 23, Applicant 24, Applicant 17, Applicant 18, Applicant 19, Applicant 20, Applicant 21, an unmapped notification file possibly involving Applicant 27, Applicant 25, Applicant 02, and Applicant 26. These are supplementary submissions, inquiries, referrals, or cross-institutional notices; correspondence alone does not establish an active CCF request or a data violation. Europol data-protection correspondence concerning Applicant 22 is tracked separately and excluded from CCF counts.

The case record contains both functioning safeguards and unresolved issues. The CCF transmitted Applicant 01 material to the General Secretariat; it requested specific protection evidence or consent in the Applicant 03 and Applicant 04 files; it reported no current Russian-origin data in the Applicant

11 matter; and two final decisions found the challenged data compliant. These are distinct outcomes and counterexamples to any claim that all ARGA submissions concern established misuse.

7. Case study: early referral and compliance follow-up

Applicant 01 (Russia; CCF/135/R1550.25). ARGA sent a note on 25 March 2026 describing three new decisions in the Russian criminal proceeding. On 7 May, the CCF replied that the correspondence had been received and that the new information had been transmitted to the General Secretariat for information and action under its procedures so it could be considered in General Secretariat compliance checks. This is the clearest documented referral in the 2026 file. It shows that a case-specific submission can reach the compliance function through the CCF. The record does not show whether the General Secretariat opened a review, what action it took, or whether the data were later changed.

What can be tested. Ask which categories of substantiated post-publication evidence trigger a General Secretariat check, whether the submitting party receives a confirmation that material has been referred, and what aggregate indicator can be reported without revealing operational details. A useful output would be a coded referral outcome (received, referred, reviewed, action taken, no action) and elapsed days at each stage.

Evidence and limits. The 25 March ARGA email and the 7 May CCF reply are primary correspondence. The available correspondence confirms the referral but does not establish a review outcome or data change. Referral is not an INTERPOL finding that the original data violated rules. Nor does it establish a national court result.

Applicant 02 (Russia; CCF/136/R1314.25). On 8 May ARGA asked about the status of the case. On 19 May the CCF acknowledged the inquiry and said a final response had been sent on 10 November 2025. ARGA stated that the response had not been received. The CCF resent it. This exchange documents an operational communication problem and correction of the correspondence record. It does not establish that the 2025 decision was wrong; the decision itself must be reviewed before drawing a procedural fairness conclusion.

The practical proposal is modest: where the CCF marks a communication as sent, it could confirm delivery or provide a secure portal copy, with receipt tracking visible to both sides. A measurable result is the proportion of final letters successfully delivered on the first attempt and the number of days between a failed delivery and resending.

8. Case study: threats and time-sensitive information

Applicant 08 (Russia/Spain; portal revision REV-2026-231). The portal shows a revision request submitted on 22 October 2026, pending initial consideration. It reports that a third party connected with the applicant received an anonymous business call on 19 July asking whether the applicant was in Spain and identifying an office address; the caller allegedly referred to an earlier Russian case and said the applicant could not live or work peacefully. It also reports that the applicant received a call on 21 August, addressed to him by name, involving questions about asylum and threats to him and his family. The statements are described as sworn. The callers have not been identified and the link to any INTERPOL record has not been independently established.

The CCF's email of 5 November says that since 26 March 2026 the CCF portal is the only channel for submissions, and that the email correspondence would not be added to the file. The portal filing remains the operative source. A CCF letter dated 11 June 2026 reportedly rejected an earlier revision linked to immigration status; the present filing asserts later events. A reference mismatch remains

between the portal's initial-decision field (CCF/137/R493.22-25) and correspondence using CCF/136/R493.22-24. Resolve this against the attached decision before citing it.

Analytical use. This case helps define an intake question: when a person reports a credible threat that might affect safety, does the handling team preserve it, triage it, and consider whether it is relevant to a compliance review? It does not yet show that the CCF accepted the facts or that the alleged caller acted for a state authority. A proper timeline should record report date, supporting material, CCF receipt, triage, and any protective or compliance response, while maintaining confidentiality.

For the recommended measure, ask the General Secretariat whether an existing channel handles alleged reprisals linked to data processing, how that channel interacts with the NDTF, and whether there is a mechanism to refer credible evidence without disclosing the applicant's identity more broadly than necessary.

9. Case study: early warning versus confirmed records

Applicant 11 (Russia; CCF/138/AF-2026-733). The CCF letter of 13 November 2026 states that it contacted the Russian NCB for the access request and that the NCB authorized it to inform ARGA that no data concerning the applicant from Russia were currently recorded in the INTERPOL Information System. It also says the CCF's mandate is limited to INTERPOL-system data and that a correction/deletion submission (DU-2026-447) was closed without further action in light of that response. This is primary evidence of an access response and a no-data result as of that date.

The case is a useful counterexample to the assumption that national search, risk of future request, or a client's concern means an INTERPOL record exists. A proper register must distinguish a preventive concern from an actual record and from a subsequent consequence. The letter does not exclude national or bilateral measures outside INTERPOL's system, and it does not say that an earlier record never existed; its wording is "currently".

Applicant 14 (Russia; AF-2026-1539 / DU-2026-913). The portal submissions in August sought access and correction/deletion. The supporting ARGA summary refers to an August 2026 official attestation concerning a domestic criminal case and federal search, with the applicant's concern that an international signal might follow. The material checked does not establish that a Red Notice or diffusion was published, or that an international consequence occurred. This is coded as preventive/anticipated exposure, pending the access response and any source documents.

Applicant 16 (Uzbekistan; AF-2026-917 / DU-2026-526). The portal and correspondence show separate access and deletion submissions. The applicant reports detention at the Qatar–Saudi border on 18 April 2026 after Qatari authorities referred to an INTERPOL-related request from Uzbekistan; the portal file includes documents described as a detention order and police record. The precise channel, database signal, custody duration, and release basis need verification from complete primary records. The access request is necessary to test the allegation; the existence of parallel access and deletion requests must not be double-counted as separate individuals.

10. Case study: detention and national proceedings

Applicant 15 (Russia/Italy; AF-2026-917 / DU-2026-555). The portal describes an arrest in Italy on 16 September 2025 on an international warrant/request linked to Russian proceedings, followed by ARGA's access and correction/deletion requests in 2026. The summary available in the records reviewed cites Italian documents and a Russian court order dated 22 April 2025. The available documents do not isolate whether the Italian action relied on an INTERPOL notice, diffusion, extradition request, regional entry, bilateral channel, or more than one source; it is therefore not counted as a confirmed INTERPOL consequence.

Applicant 12 (Kazakhstan/Germany). The portal shows a correction/deletion filing dated 1 April 2026 and a related access matter. The case materials describe a Kazakhstan search entry and detention in Germany in 2025. The Higher Regional Court in Nuremberg refused extradition on 4 February 2026. That judicial outcome is important to the person's liberty, but it is not in itself a finding that an INTERPOL record violated INTERPOL rules. The precise court ground and the actual notice/diffusion channel should be quoted from the certified judgment and CCF access response.

Applicant 13 (Russia/Germany/Spain). ARGA's January 2026 correspondence transmitted two new documents in a case previously addressed by the CCF. CCF replied on 9 January that its final response dated 2 September 2024 meant no application was pending and the new correspondence was not actionable. On 16 April ARGA sent a new request by email; on 17 April the CCF said that, after the portal-only change, email applications would not be processed. ARGA then filed through the portal; the portal entry shows submission on 17 April. The OLG Nürnberg decision of 4 February 2026 reportedly found the extradition request inadmissible. That is a national-court outcome, not proof of INTERPOL non-compliance.

Why the distinctions matter. A single detention may follow an INTERPOL message, a national warrant circulated through an EU system, a provisional arrest request, or direct diplomatic channels. The legal challenge may succeed because of specialty, nationality, limitation, evidentiary, or human-rights grounds independent of INTERPOL's data rules. Each chain must be shown document by document.

11. Case study: reasons, access, and revision

Applicant 07 (Russia/France; CCF/137/R975.23-25). CCF correspondence dated 6 July 2026 says it took note of information received on 21 August 2025 but that the file contained correspondence asking about asylum, not proof that an asylum application had been filed. It also states that inquiries are not recorded as data in INTERPOL's system. ARGA replied on 10 July that the applicant had not yet been able to provide a new document and later submitted a revision supplement on 12 October. The portal shows REV-2026-229 pending initial consideration and describes a hearing record obtained on 24 August 2026, which allegedly records the prosecutor's refusal to add US records after the investigator refused them and a complaint under Russian CPC Article 124.

This is not evidence that CCF's reasons were inadequate. It shows why the distinction between a client's reported refugee status, an actual asylum application, and a formal status decision matters. It also creates a testable question about Article 42: can a decision's short explanation help an applicant identify the type of new fact that would be material? The evidence supports a focused question about whether decision explanations identify the factual issue and the kind of new evidence that could matter under Article 42.

Applicant 03 (Russia/Spain; CCF/136/R1187.25-26). ARGA filed on 14 March 2026. On 15 May the CCF said the request was admissible, asked for current Spanish asylum status or refugee evidence, and requested a signed form and consent for transmission of the file to Spain. This is an acknowledgment of admissibility and a request for information, not a merits result. The request shows the CCF's need for country-specific protection evidence.

Applicant 04 (Russia/United States; CCF/136/R295.26). The CCF's 6 March letter says the request received 15 February was admissible and asks for confirmation of US asylum status and a signed form; it cites a heavy backlog and says review is ongoing. ARGA supplied the signed form on 11 March and additional information on 13 October. The correspondence is useful for measuring elapsed time and information requests; until a decision is located, it does not support a conclusion about compliance or the adequacy of reasons.

Articles 35 and 38 address confidentiality and reasoned decisions; Article 42 provides for revision. Confidentiality restrictions and merits findings are distinct.

12. Case study: confirmed merits decisions

Applicant 10 (CCF/137/R1924.25). The CCF decision adopted on 6 October 2026 and transmitted on 3 November found the challenged data compliant. This report records the procedural outcome only and does not reproduce applicant-only reasoning.

Applicant 09 (CCF/137/R1546.24). The CCF decision adopted on 6 October 2026 and transmitted on 2 November found the challenged data compliant. This report records the procedural outcome only and does not reproduce applicant-only reasoning.

Applicant 06 (Russia/France; CCF/136/R886.22-26). On 20 March 2026 the CCF described the access request as admissible and the revision of an earlier chamber decision as a separate track. It noted that revision under Article 42 is not an appeal and depends on a new fact which could have led to a different result, raised within six months of discovery. ARGA sent a supplement on 2 July. The reviewed materials do not include a final merits result by the cutoff.

Applicant 05 (Russia/Spain; CCF/136/R686.26). The 2 March filing was acknowledged. On 8 April the CCF said the request received on 2 March was admissible, the review remained ongoing, and heavy workload contributed to delay. This confirms the administrative stage, not a final decision. It can support a precise duration analysis only if the closing date is later obtained.

For each decision, ARGA should extract the operative conclusion, any disclosed reasoning, the decisive facts, date of request, date of decision, and whether a new application or review remains possible. These fields will make later year-to-year reporting auditable.

13. Additional 2026 casework: careful classification

The mailbox includes additional supplementary filings that are relevant to the workload and communication chronology, but not all contain a complaint about misuse. These should remain in the case register, not be forced into a finding. They include: Applicant 23 (CCF/134/R1799.24; a document sent 28 August); Applicant 24 (CCF/137/R1631.24; a 3 June 2026 appellate judgment supplied on 17 August after a CCF request of 28 July); Applicant 17 (CCF/134/R1460.25; supplement sent 25 May); Applicant 18 (CCF/135/R1422.25; official document sent 2 February); Applicant 19 (CCF/134/R185.24-25; three documents sent 14 January); Applicant 20 (CCF/134/R842.24-25; an identification correction sent 20 February); and Applicant 21 (supplement sent 31 January and subsequent portal activity in May/August/November).

The exact legal questions in these files should be summarized only after reading their letters and attachments. For example, a document may concern identity correction, admissibility, refugee status, or procedural updates rather than a merits challenge to an INTERPOL record. Similarly, a CCF receipt from an automated address does not establish that the material was considered. When the CCF later says a submission was added to a file or transmitted to another body, record that exact phrase and its date.

Two other cross-institutional matters deserve separate but non-combinable treatment. For Unmapped notification matter (possibly Applicant 27; verify), ARGA sent an April notification concerning INTERPOL status and recognized refugee protection. For Applicant 22, ARGA sent an access request to Europol's Data Protection Function and received correspondence in February and April. These are not CCF merits cases and should not enter CCF request counts. They may be included as contextual

evidence about downstream data management only where the underlying Europol response is reviewed.

R. Applicant 25 correspondence in March concerned clarification of representation and communication channel in an existing CCF file. That is a procedural event, not a new case. In the case register, all related documents should be grouped under the existing person/case identifier, with each submission and response counted separately only in a correspondence activity table.

Before release, reconcile each supplementary filing to the portal and record whether CCF acknowledged receipt, deemed it admissible, added it to the record, referred it, or gave a merits decision. These states are not synonyms.

14. Counterexamples and alternative explanations

Counterexamples improve the report's accuracy. Case M (Applicant 11) shows that an access request may establish that no current data from the named NCB are held in INTERPOL's system. Cases H and I (Applicant 10 and Applicant 09) show that the CCF may find data compliant after reviewing deletion requests. Case C (Applicant 03) and Case B (Applicant 04) show the CCF asking for specific evidence and consent before proceeding. Case A (Applicant 01) shows a path for information to be transmitted to the General Secretariat. These examples demonstrate existing safeguards and channels that can work; they do not show that every concern was resolved.

National courts can refuse extradition for reasons that do not establish an INTERPOL violation. The OLG Nürnberg outcomes in the Applicant 12 and Applicant 13 matters are examples requiring this separation. The judgments must be examined for their operative grounds before any statement is made. A refusal based on nationality, double criminality, limitation, evidence, proportionality, or domestic procedure should not be coded as a finding about a Red Notice unless the court expressly decides that issue.

Public reporting may overstate a causal connection if an arrest happened after an INTERPOL alert but the warrant or another database was the operative basis. The external Hniot and Hasan accounts were identified in secondary reporting, but the underlying CCF decisions and national court records were not retrieved in the source set used in this report. They remain leads, not counted cases. The same rule applies to ARGA case files where a portal narrative reports an INTERPOL link but the court record identifies only an international warrant.

Potential non-INTERPOL explanations include national wanted lists, bilateral police alerts, Schengen Information System entries, extradition requests, provisional arrest requests, border-control data sharing, and the existence of a domestic warrant independent of any notice. A court's release or refusal may result from procedural defects without changing the INTERPOL record. Conversely, deletion of an INTERPOL record does not automatically erase national or bilateral data. Each mechanism must be established from the document naming it.

There is also a selection effect: ARGA is more likely to see contested and consequential cases. The report describes patterns in ARGA's work, not the incidence of misuse among all INTERPOL notices.

15. External evidence and source map

Official INTERPOL sources. INTERPOL's "About Notices" explains the compliance review and distinction between notices and diffusions. Its "Compliance and review" page states that NDTF checks legal and data-quality criteria, including RPD Articles 82–99, and describes post-cancellation vigilance, national lists, non-INTERPOL bilateral/regional alerts, and possible interim or corrective

measures for a repeatedly non-compliant NCB. These are primary institutional descriptions and should anchor any proposal to the right unit.

CCF 2024 Annual Activity Report. The report provides the system-wide statistics cited in Section 5, describes delay and workload, and notes that restrictions and exchanges with NCBs may affect disclosure of reasoned decisions. It is an official aggregate source. Its unit is requests, and its cohorts must not be mixed with ARGA's selected case files.

2025 CCF Statute amendments. The CCF "About the CCF" page summarizes amendments adopted at the 93rd General Assembly, including the direct NCB-to-NCB exchange limitation (Articles 3, 19 and 28(1)), authorized access to information sent from CCF to the General Secretariat (Article 23), and a 45-day notification provision (Article 33(2)). The exact adopted Statute should be checked before quoting operative text.

CCF decisions and FAQ. Publicly anonymized decision excerpts and the CCF FAQ explain Article 3 assessment, revision timelines, and the Commission's limited mandate. Use them as official interpretive materials, not as substitutes for a case-specific decision.

European Court of Justice. CJEU Case C-505/19, WS v Germany, addresses the relationship between an INTERPOL Red Notice and EU law, including the consequences of a final non bis in idem decision. It is relevant to how national authorities handle an alert and the status of an underlying prosecution; it does not establish that any ARGA case involved an unlawful notice.

External incident reporting. Freedom House's July 2024 "TNR Watch: Interpol on Notice" recounts the Hniot and Hasan cases, including reported arrests and subsequent events. In this scan the original court and CCF decisions were not retrieved. The episodes should be reported as secondary-source leads and excluded from core count until originals are verified. Broad searches in English, French, Russian, and relevant national languages should continue; the present external case list is incomplete.

Full URLs and retrieval notes belong in the companion source register. Any statement based on a public source should carry a publication date and pinpoint page/paragraph. Search result snippets are not sufficient for final citation.

16. Statistical results and calculation rules

No country-level rate of misuse is calculated. The numerator is not complete and the denominator—the total number of requests by each country and channel—is not publicly available in a comparable form. The number of ARGA cases associated with a country, even if verified, would describe ARGA's own sample and cannot be divided by total INTERPOL notices without aligned units and periods.

For the 2023–2025 ARGA baseline, the report carries forward only the prior report's approximate caseload description as provisional. The underlying person/case/request/record register must be reconciled before publishing exact counts. The 2026 mailbox search produced 162 unique message IDs from the chosen search queries. This is a volume of correspondence search results, not a case count. The portal showed 13 submitted forms on the inspection date; several belonged to the same person, and a case may also have multiple email events. Therefore neither number should appear as a numerator for abuse, record deletion, or injury.

For INTERPOL's 2024 public statistics, the key denominator relationships are: 703 admissible deletion requests concerning applicants subject to data out of the 1,077 closed deletion requests (65.3%); 164 pre-decision deletions out of those 703 (23.3%); 217 compliant decisions out of 539 remaining requests (40.3%); 272 non-compliant decisions plus 50 non-compliance due to total NCB

non-cooperation, or 322/539 (59.7%). These percentages are our calculations from the CCF report counts. They refer to requests, not people or records, and the 164 pre-decision deletions should not be described as CCF findings that data were non-compliant.

Duration statistics from the CCF report are 30% of deletion requests exceeding nine months and 70% of access requests exceeding four months. The report's exact cohort definitions should be consulted before using the proportions in a public document. The data demonstrate workload and delay but not causation in any one ARGA case.

For the next annual cycle, every register row should include: person ID, case ID, request ID, record type, requesting and consequence countries, channel, event dates, legal basis, source level, result, and link to original document. Summary calculations should be generated only from de-duplicated case and person fields, with counts for records, consequences, and requests displayed separately.

17. Finding 1: documentable early screening signals

Pattern to test. Across ARGA's reviewed casework, applicants and representatives describe a combination of indicators that may warrant a closer look before a notice or wanted-person diffusion is issued: a dispute with a commercial or political context; a rapid escalation from a private dispute to criminal charges; contemporaneous evidence that exculpatory records were excluded; a protection claim or refugee status; contradictory procedural records; and an anticipated or actual cross-border arrest consequence. These are not, by themselves, proof of a prohibited political character or rule violation. They are possible prompts for additional, proportionate verification.

Evidence. The current 2026 record includes the Applicant 07 revision materials, the Applicant 10 and Applicant 09 final decisions, the Applicant 01 referral, and pending filings such as Applicant 08 and Applicant 14. Their evidentiary status varies. No single checklist can be presented as validated by this convenience sample; a wider, anonymized historical register and external source validation are needed.

Responsible INTERPOL actor. The General Secretariat's Notices and Diffusions Task Force reviews incoming notice/diffusion requests. The relevant NCB remains the source for requested judicial material. The proposal should seek a discussion with the operational team, not ask the CCF to pre-judge an incoming request outside its case-handling mandate.

Proposed measure. Pilot a short "additional information" trigger list for cases where two or more independently documented risk signals appear. It could prompt the reviewer to ask for the charging instrument and factual particulars, current status of domestic proceedings, protection-status information where relevant, and an explanation of material contradictions between records. Build in an explicit "not enough information" outcome, with an audit trail and no automatic adverse inference from country or offence category alone.

Success measure. In a six-month anonymized pilot, report the proportion of flagged requests receiving an information request before circulation, median time to resolve, proportion ultimately published/registered, and rate of later review or correction. The measure is useful only if it improves data quality without delaying routine low-risk requests indiscriminately.

Why this is proportionate. INTERPOL already describes seeking additional information and performing contextual review. ARGA's suggestion is to make triggers and outcomes more auditable, not to replace current human judgment or add a presumption against a country.

18. Finding 2: follow-up after correction or deletion

Pattern to test. People may continue to face consequences after a notice is cancelled or data are corrected because domestic and regional systems can retain copies or operate on another legal basis. INTERPOL's public compliance page itself notes that national wanted lists and bilateral or regional alerts may continue, and that authorities may need to be reminded to update national databases. This is a known systems issue. The ARGA 2026 materials reviewed for this report do not yet establish a post-deletion case with a complete verified timeline from deletion to ongoing national consequence.

Evidence. No case in the current register is counted as a verified post-deletion harm until the editorial group has (i) the INTERPOL cancellation or CCF decision, (ii) proof of the later national consequence, and (iii) a document connecting the later consequence to a retained national or bilateral signal. Case M is a no-current-data access result, not a post-deletion event. Case O concerns national-court extradition inadmissibility, not necessarily a prior deletion. Other cases remain pending.

Responsible actor. The General Secretariat can confirm cancellation and communicate with the source NCB; destination NCBs and national authorities control their own databases. The CCF can decide INTERPOL-system compliance but cannot order national record deletion. CPD can discuss data-processing standards and oversight expectations; delegates can consider broader cooperation guidance.

Proposed measure. Explore a standardized cancellation notice that identifies the record status and date, explains which national and regional holders have been notified where legally permissible, and provides an acknowledgement request. Develop a user-facing process to request confirmation that the domestic recipient updated or removed a linked alert. Where direct NCB-to-NCB exchange is involved, the post-2025 Statute scope and reporting route must be expressly considered.

Success measure. Report the median time from INTERPOL cancellation to destination-NCB acknowledgement, proportion of recipients confirming action within 30 days, and count of documented post-cancellation incidents. Count only cases where the source chain is established. This turns a general concern into an auditable service-quality question.

Do not claim that the CCF or General Secretariat can compel national authorities to alter domestic files unless an applicable legal instrument expressly provides that power.

19. Finding 3: reasons and meaningful revision

Pattern to test. The 2026 correspondence shows that a party may need to understand exactly which factual gap remains—such as proof of a filed asylum request—before submitting new information. The CCF's own annual report notes that restrictions requested by an NCB can sometimes prevent it from sharing its reasoned decision. The ARGA record also shows that applicants sometimes submit inquiries or allegations without the formal document the CCF requires. These facts support a focused inquiry about how decisions communicate dispositive factual issues within confidentiality limits; they do not establish that any one decision was legally deficient.

Case evidence. In Applicant 07, the July 6 letter distinguished inquiries about asylum from evidence that an application had actually been filed. In Applicant 03 and Applicant 04, the CCF requested current protection-status information. In Applicant 10 and Applicant 09, the Secretariat transmitted a final result that data were compliant; the complete attached decisions must be assessed for the reasoning disclosed. In Applicant 06, the CCF explained that revision is distinct from appeal and requires a qualifying new fact within six months.

Legal frame. The final citation must be checked against the 2025 amended CCF Statute, including Articles 35 and 38 as invoked in ARGA's August position, and Article 42 on revision. The purpose is not to demand disclosure of protected source material. It is to ask whether a decision can state the issue resolved, the kind of evidence considered decisive, and the type of new fact that may qualify for revision, while explaining any restriction applied.

Responsible actor. The CCF is the relevant body for its decision format and confidentiality practice. CPD may discuss oversight or rule-level standards but cannot direct the outcome of an individual application. The General Secretariat should not be asked to disclose confidential case information.

Proposed measure and metric. Pilot a short, standardized "reasoning summary" with (1) the legal test applied, (2) the material factual issue, (3) the decisive evidence category, and (4) a plain-language explanation of any disclosure restriction. Measure whether applicants can accurately identify what fact would be relevant to an Article 42 revision; compare clarification requests and incomplete submissions before and after the pilot, using aggregated counts.

20. Two-minute briefing for an INTERPOL reader

Verified indicator. In the 2024 CCF activity report, 164 of 703 admissible deletion requests concerning applicants subject to data resulted in deletion by the source NCB or General Secretariat before a CCF decision. This is 23.3% of that defined subgroup, calculated from the published counts. It is not a finding that the data were non-compliant; it shows that data status can change before the CCF finishes a merits decision. For the same report, 30% of deletion requests exceeded nine months. These are system-wide request statistics, not ARGA case rates.

Short example. In the Applicant 01 matter, the CCF wrote on 7 May 2026 that it had transmitted ARGA's new information to the General Secretariat for information and action under its procedures so it could be considered in compliance checks. That confirms a route for substantive material to reach the compliance function. ARGA has no record showing what action followed.

Proposed measure. Add an auditable referral outcome and timing field for post-publication evidence sent to the General Secretariat: receipt, referral, review, action, or no action, without disclosing confidential operational details. Publish annual aggregate data on referral volume, median response time, and disposition.

Why it fits current practice. INTERPOL publicly describes NDTF review of notices and wanted-person diffusions and the possibility of asking for additional information; its compliance page also describes continued vigilance and corrective measures. The proposal asks for visibility into an existing compliance path rather than creation of a new substantive rule.

English quotation-ready paragraph. "ARGA Observatory's casework suggests a practical question for INTERPOL's compliance work: when new, documented information reaches the General Secretariat after a notice or diffusion has circulated, can the referral and follow-up be tracked in a way that shows whether the information was reviewed and whether any correction was made? In one 2026 matter, the CCF confirmed that ARGA's material had been transmitted to the General Secretariat for consideration in compliance checks. We recommend an anonymized referral-outcome indicator, with elapsed time, so that the effectiveness of existing safeguards can be assessed without exposing confidential case data."

Assembly link. The 94th General Assembly is scheduled in Hong Kong from 30 November to 3 December 2026. The public-facing programme reviewed for this report did not show a specific CCF agenda item. The brief is relevant to broader discussions of operational quality, data processing, and

safeguards but should not be attributed to a particular agenda item unless a working paper or finalized programme confirms the connection.

21. Engagement strategy and response tracking

The strongest channel evidenced by the prior annual exchange is a direct email to CCF@interpol.int with a named report and a clear request for referral. On 6 November 2025 ARGA sent its 2023–2025 report; on 10 November the CCF acknowledged receipt, said the report would be reviewed and considered by the Commission, and stated it had also been transmitted to the General Secretariat for information. The response is useful because it names the report and confirms transmission, but it gives no reference number, receiving unit, named recipient, review outcome, CPD referral, or substantive answer.

In 2026, the Applicant 01 exchange shows a more specific result: the CCF confirmed transmission to the General Secretariat "for information and action under its procedures" so the material could be considered in compliance checks. The letter does not name an individual or operational unit. This wording should be quoted exactly in a future cover message as the most recent documented referral precedent—not described as policy uptake.

After the Assembly, send one brief follow-up asking whether the material was transmitted, considered, or mentioned, and whether further information would help. Track four outcomes separately: receipt, transmission, consideration, and mention. Exact wording and date must be logged; silence is not a refusal or a referral.

Institutional correspondence should use anonymized case labels and public aggregate evidence, and include file references only where needed to identify the cited exchange.

22. Source list and primary document trail

ARGA records. Annual Analytical Report 2023–2025 (5 November 2025); 6 November 2025 cover email and 10 November 2025 CCF response; 2026 outgoing and incoming correspondence located by search; portal submissions and statuses observed on 18 November 2026; case-specific court and administrative documents attached to the relevant files. The source register below identifies the primary correspondence and preserves the associated CCF and portal references.

INTERPOL / CCF. CCF Annual Activity Report 2024, official General Assembly report, sections on requests, deletion outcomes, delay, and restrictions on reasoning; CCF "About the CCF" and "CCF FAQ" pages; INTERPOL "About Notices"; "Compliance and review"; "Legal documents"; "How to submit a request"; CCF public anonymized decisions. Key current legal sources: INTERPOL Constitution, CCF Statute (as amended in 2025), Rules on the Processing of Data, and the applicable General Assembly resolution adopting amendments.

European Union. Court of Justice of the European Union, Case C-505/19, WS v Bundesrepublik Deutschland, judgment of 12 May 2021, ECLI:EU:C:2021:376. Use the official EUR-Lex judgment and national implementing context for any proposition about a specific arrest or data system.

External secondary lead. Freedom House, "TNR Watch: Interpol on Notice," 11 July 2024, concerning Andrei Hniot and Idris Hasan. The article is a secondary source; its assertions are not included in core case counts pending retrieval of original court and CCF records.

Search languages and limits. External search was conducted in English, French, and Russian for INTERPOL, CCF, national extradition/detention rulings, and named public cases. The current source set does not yet document a broad search in every relevant national language. Search gaps: primary records for the Hniot and Hasan episodes; complete certified judgments in Applicant 12 and Applicant 13; the full decision texts for Applicant 10 and Applicant 09; the final result in Applicant 07's 2026 revision; and source-of-signal evidence for pending cases.

URLs and exact pinpoint citations should be carried into the companion source register and verified again immediately before any external circulation. The report avoids quoting search snippets as evidence.

23. Evidence limitations and conclusion

Conclusion. The available evidence supports engagement focused on measurability: how documented risk indicators trigger requests for more information; how a post-publication referral is tracked through compliance review; and how the CCF communicates the decisive factual issue within its confidentiality limits. The evidence does not support a global estimate of misuse, a claim that all court refusals concern INTERPOL, or a finding that every contested ARGA case violates INTERPOL rules. That disciplined scope makes the proposed requests answerable.

ARGA's editorial group remains responsible for final case selection, primary-source verification, calculations, legal analysis and conclusions.

24. Chronology of institutional correspondence

The mailbox record separates several types of institutional response. In the previous annual-report exchange, ARGA sent its 2023–2025 analytical report to CCF@interpol.int on 6 November 2025 at 22:57 Paris time. The subject line began with a typographical omission ("nnual Analytical Report"). On 10 November 2025, the CCF wrote: "We acknowledge receipt of the analytical report prepared by ARGA, which will be reviewed and considered by the Commission. Please note that it has also been transmitted to the INTERPOL General Secretariat for information." No registration number, receiving unit, individual recipient, CPD referral, or substantive answer was stated. The result is coded as receipt, consideration promised, and transmission to the General Secretariat; it is not coded as substantive review or mention.

On 25 March 2026, ARGA sent new information in the Applicant 01 file. On 7 May, the CCF stated that the material was received and transmitted to the General Secretariat "for information and action under its procedures" so it could be considered in compliance checks. This is the most concrete referral in the current year's case correspondence. It still does not show what the General Secretariat did with the information.

On 8 May ARGA asked for status in the Applicant 02 file. On 19 May, the CCF said its final response had been sent on 10 November 2025. ARGA reported non-receipt, and the CCF resent a copy. This is a delivery correction rather than a new substantive answer. It demonstrates why an annual engagement log must preserve message-level events and exact wording.

On 8 April, in the Applicant 05 file, CCF confirmed admissibility and ongoing review, noting heavy workload. On 15 May, in the Applicant 03 file, CCF confirmed admissibility and requested current Spanish protection evidence and consent to transmit the file. On 6 March, in Applicant 04, CCF said the request was admissible, requested proof of asylum status and a signed form, and cited backlog. These are procedural responses, not merits outcomes.

On 2 and 3 November, the CCF sent final letters in Applicant 09 and Applicant 10, finding the challenged data compliant. On 13 November, it informed ARGA that there was no current data from Russia in the INTERPOL system for Applicant 11 and closed the related deletion request. On 5 November, it stated that an email supplement in Applicant 08 would not be added to the file because the portal had become the only submission channel. Each event must be logged under a different outcome code.

25. Direct exchange and the 2025 Statute amendments

In 2025, the General Assembly amended the CCF Statute. INTERPOL's public summary states that the CCF cannot review information exchanged directly between NCBs unless a serious violation of INTERPOL rules is reported and the issue is brought to the CCF's attention in the same way as to the General Secretariat (Articles 3, 19, and 28(1)). The summary also states that access to information transmitted from the CCF to the General Secretariat is limited to authorized staff (Article 23), and that the General Secretariat must notify the CCF within 45 days if data concerning an applicant are being processed in the INTERPOL Information System after a request (Article 33(2)). The exact operative text should be quoted from the adopted Statute, not from the website summary.

This amendment has two practical consequences for ARGA's review. First, a national consequence following a direct message between NCBs may fall outside CCF review unless the serious-violation route is used. A claimant must preserve the message or a national record that identifies the channel; a court's reference to "international search" is not enough. Second, the fact that the CCF transmitted information to the General Secretariat does not mean that the applicant or representative can access the full inter-institutional material. Future correspondence should therefore ask for a narrow, non-confidential status confirmation—whether material was transmitted and whether a referral was made—rather than seek protected operational content.

For each ARGA file, the working register should classify the channel as: (a) INTERPOL Red Notice; (b) wanted-person diffusion; (c) other INTERPOL-system data; (d) direct NCB-to-NCB message; (e) regional system; (f) bilateral or diplomatic channel; (g) national wanted list; or (h) unknown. The amendment is considered relevant only where source documents support category (d), or where the CCF/General Secretariat explicitly refers to direct exchange. If an applicant alleges an INTERPOL link but primary documents do not specify it, code "unknown" and do not state that the amendment applies.

The current 2026 set contains no complete primary chain establishing that a specific detention reviewed in this report resulted solely from direct NCB-to-NCB exchange. The amendment is therefore incorporated into the legal framework and evidence checklist, but it is not used as a causal explanation for any featured case. This is a material limitation that should remain visible in external versions.

For CPD, a suitable question is whether the Committee or Secretariat has assessed how the amended statutory boundary affects access to review when NCB-to-NCB information is received in destination jurisdictions, and whether existing serious-violation reporting routes are sufficiently clear to affected individuals. ARGA should frame this as a request for guidance and aggregate safeguards, not as a challenge to a particular pending CCF matter.

26. Data register design for the next cycle

To make the next annual report reproducible, ARGA should keep four linked tables rather than one flat list. The person table uses a case key and minimal identifiers. The case table records country of alleged source, country of consequence, legal proceeding, case start/end, and confidence grade. The request table records every CCF filing or General Secretariat communication, including application

type, submission channel, submission date, reference, admissibility, and final outcome. The consequence table records each arrest, border stop, extradition hearing, travel restriction, or database action, with its date, jurisdiction, claimed channel, and supporting document.

Every evidence row should carry the source filename or email subject, date, page/paragraph, primary/secondary status, and a short statement of what it proves. A second field should identify what it does not prove. For example, a court order may prove that extradition was refused on a specific ground but not that an INTERPOL alert existed; a CCF acknowledgment may prove receipt but not a merits finding; a deletion may prove the system no longer held data at a later date but not that earlier processing violated a rule.

Use stable case codes in the analytical dataset, and keep any re-identification key in a separate access-controlled file. For external tables, suppress combinations that reveal identity through rare country/date/proceeding details. Do not include passport numbers, full dates of birth, private addresses, or telephone numbers in the report unless an editor establishes a clear analytical need.

Minimum annual metrics: unique persons; unique legal cases; CCF requests by type; records confirmed by access response; records deleted before CCF decision; records found compliant; records found non-compliant; national proceedings; distinct consequences; time from first consequence to CCF filing; time from filing to admissibility; time from filing to final response; time from deletion/cancellation to national confirmation; and referral/mention outcomes. Each metric must show its denominator and missing-data count.

Quality checks should flag: one person with multiple requests; duplicate email forwards; files that use inconsistent CCF reference numbers; cases with court outcomes but unknown INTERPOL channel; records with reported deletion but no source document; and current-year correspondence that continues a prior-year case. A reviewer should sign off on the final de-duplication file and preserve a dated export of the calculation workbook.

27. Final scope statement

This report is designed to prompt an answer from a competent INTERPOL reader. The strongest asks are bounded: confirm receipt of a named report; state whether and to whom it was transmitted; answer one process question about tracking documented post-publication referrals; and identify whether the material can be placed before CPD or used in current or future work. These requests are easier to answer than a general request to comment on “abuse” across the organization.

The casework gives the report concrete examples of both friction and functioning safeguards. The Applicant 01 referral provides a direct channel from a CCF submission to General Secretariat compliance checks. CCF letters asked for proof of asylum status or consent where those details mattered. A current access response reported no data from a source NCB. Two final decisions found challenged data compliant. Portal-only intake rules were enforced in the Applicant 08 and Applicant 13 correspondence. Applicants also experienced delays, unanswered merits questions, and separate national consequences; those claims must remain linked to their evidentiary status.

These facts support an agenda of traceability, data quality, and clear communication. They do not support a claim that CCF has found broad systematic abuse in the ARGA portfolio, nor that every negative consequence was caused by INTERPOL data. The report’s practical contribution is to show what can be checked, by whom, and which event would count as improvement.

The external edition retains file references for traceability and uses stable labels in place of applicant names.

Appendix A. Anonymized case and source register

This register combines the case register with the report's source trail. Applicant names are replaced by stable labels, while case references are retained. The exact matter count is not certified where portal references or identities remain unresolved. Evidence grades: A — official primary record reviewed; B — corroborated primary records; C — applicant/representative account supported by partial records; D — secondary report without accessible primary source.

Table A1. 2026 ARGA case register

Person and file reference	2026 chronology and primary source	What is confirmed and what remains uncertain
Applicant 01 — CCF/135/R1550.25	25 Mar 2026 supplement; 7 May CCF reply	CCF said material was sent to General Secretariat for information/action under procedures and could be considered in compliance checks. Referral confirmed; no downstream use confirmed.
Applicant 02 — CCF/136/R1314.25	8 May inquiry; 19 May reply + 2025 letter re-sent	CCF said earlier letter sent 10 Nov 2025; ARGA reported non-receipt; CCF re-sent it. Delivery/receipt issue, not substantive finding.
Applicant 03 — CCF/136/R1187.25–26	14 Mar submission; 15 May admissibility reply	CCF requested evidence of Spanish asylum/refugee status, signed form and consent to share with Spain; no final decision located.
Applicant 04 — CCF/136/R295.26	15 Feb submission; 6 Mar admissibility; 11 Mar signed form; 13 Oct supplement	CCF requested proof of US asylum status and signed form; noted backlog. No final decision located by cutoff.
Applicant 05 — CCF/136/R686.26	2 Mar submission; 8 Apr reply	CCF said request admissible and under examination; noted heavy workload. No final decision located.
Applicant 06 — CCF/136/R886.22–26	20 Mar revision/access correspondence; 2 Jul supplement	CCF explained access and revision are separate procedures; Article 42 revision is not an appeal and requires new facts within six months. No final revision outcome located.
Applicant 07 — CCF/137/R975.23–25; REV-2026-229	6 Jul letter; 10 and 12 Oct filings; portal acknowledgment 12 Oct	CCF letter said correspondence asked about asylum but supplied no evidence an application had been filed; inquiries are not INTERPOL data. 12 Oct revision says newly discovered hearing record; portal status pending initial consideration.

Person and file reference	2026 chronology and primary source	What is confirmed and what remains uncertain
Applicant 08 — CCF/136/R493.22–24; portal REV-2026-231	19 Jul and 21 Aug reported calls; Oct 22 portal revision; Nov 5 email reply	Two anonymous calls reported; caller and INTERPOL link unverified. Revision pending initial consideration. CCF said portal is sole intake channel since 26 Mar 2026 and email supplement was not added to file. Portal/email reference mismatch CCF/137/R493.22–25 requires reconciliation.
Applicant 09 — CCF/137/R1546.24	13 Aug session notice; 2 Nov final letter and attached decision	Final letter states challenged data compliant. The report records the procedural outcome without reproducing applicant-only reasoning.
Applicant 10 — CCF/137/R1924.25	21 Aug session notice; 3 Nov final letter and attached decision	Final letter states challenged data compliant. The report records the procedural outcome without reproducing applicant-only reasoning.
Applicant 11 — CCF/138/AF-2026-733; DU-2026-447	10 Aug access and correction filings; CCF reply 13 Nov	CCF reported it contacted Russian NCB; NCB authorized statement no Russian data currently stored in INTERPOL system. Related deletion request closed without further action. “Currently” does not establish historic absence or absence of national/bilateral measures.
Applicant 12 — DU-2026-39; related AF request needs reference check	Email request 31 Mar rejected after portal rule; portal submissions 1 Apr	German OLG Nürnberg refusal of extradition 4 Feb 2026 is separate; exact legal ground requires judgment. Do not treat as INTERPOL non-compliance. Confirm matching access request number.
Applicant 13 — CCF/130/R901.24; portal submission 17 Apr	CCF email 9 Jan; further email rejected 17 Apr; portal receipt 17 Apr	CCF said no application pending after final response of 2 Sep 2024. New email not accepted under portal-only rule. OLG Nürnberg 4 Feb extradition outcome is separate; legal ground not verified here.
Applicant 14 — AF-2026-1539; DU-2026-913	Portal submissions 14 Aug	Separate access and correction/deletion requests for one person. Correction request pending examination; MVD certificate dated 3 Aug referenced; no verified notice or consequence established.
Applicant 15 — AF reference requires reconciliation; DU-2026-555	Portal submissions 18 Jun; CCF messages 29 Jul	Separate access and correction/deletion requests. Reported arrest in Italy on 16 Sep 2025; exact signal/channel not established. Do not count two requests as two people.

Person and file reference	2026 chronology and primary source	What is confirmed and what remains uncertain
Applicant 16 — AF and DU portal records; reference reconciliation required	Portal 14 Jun, 20 Aug; CCF emails 14 Aug and 3 Nov	Access and correction/deletion tracks appear separate. Portal narrative reports Qatar detention 18 Apr 2026 and possible Uzbek request; detention-to-INTERPOL channel linkage remains applicant-reported/unverified.
Applicant 17 — CCF/134/R1460.25	25 May supplement	ARGA sent supplementary material. Status/outcome not established by the located thread.
Applicant 18 — CCF/135/R1422.25	2 Feb supplement; earlier CCF correspondence in 2026	Supplementary documents sent. No final determination located in the checked thread.
Applicant 19 — CCF/134/R185.24–25	14 Jan supplement	Three documents sent. No final determination located in checked thread.
Applicant 20 — CCF/134/R842.24–25	20 Feb addendum	Identity-data correction notice sent. Do not infer data deletion.
Applicant 21 — CCF file; portal access submitted 21 May and 4 Aug / 4 Nov	31 Jan and 5 Mar supplements; portal record	Supplementary documents sent and later access submissions acknowledged. Portal counts are requests, not separate persons. Current disposition requires direct portal check.
Unmapped access-request applicant Portal access request; receipt 4 May; CCF email 9 Jul	4 May portal receipt; CCF email 9 Jul	Portal access matter; no substantive CCF outcome located in checked set.
Unmapped notification matter (possibly Applicant 27; verify)CCF/133/R610.25; related notifications	5 Apr notice to recipients; CCF acknowledgment 30 Apr	A notice to recipients concerning status/protection; no causal effect on a CCF result established. The intended addressees and the relationship to Applicant 27 are not established by the records reviewed.
Applicant 22 — Europol DPF DSAR (not CCF count)	30 Jan request; 12–16 Feb and 22 Apr replies	Separate Europol data-protection correspondence tied to a notification concerning a CCF decision. Keep outside CCF person/request statistics. Europol DPF correspondence; excluded from CCF totals.
Applicant 23 — CCF/131/R1799.24; CCF reply reference CCF/134/R1799.24	28 Aug 2026 supplementary document; earlier 2024 file	Supplement sent in older matter; CCF message 7 Oct 2025 requested confirmation from Spain. No 2026 outcome located.

Person and file reference	2026 chronology and primary source	What is confirmed and what remains uncertain
Applicant 24 — CCF/137/R1631.24	28 Jul CCF request; 17 Aug appellate judgment supplement	Appeal judgment dated 3 Jun 2026 sent within CCF deadline. Disposition is not established from this correspondence alone.
Applicant 25 — CCF/135/R418.23; CCF/136/R418.23	20 Mar representation/channel clarification	ARGA clarified representation and communication channel. No substantive result inferred.
Applicant 26 — separate correspondence	ARGA notification in April 2026 concerning INTERPOL status and recognized refugee protection.	Outgoing notification referenced in the expanded report; case link, exact attachment and response/action are not established in the consolidated register. Do not count as a confirmed CCF outcome.
Applicant 27 — identity/linkage to verify	Mentioned in supplementary case correspondence.	Keep separate from the unmapped CCF/133/R610.25 notification until identity and reference are checked; no merits outcome inferred.

Reconciliation flags. The Applicant 15/Applicant 16 portal references may overlap; Applicant 08's email reference CCF/136/R493.22–24 differs from the portal field CCF/137/R493.22–25; and Applicant 12's related access reference needs verification. Two identities remain unmapped and the Applicant 27 linkage is uncertain. The targeted mailbox search did not locate ARGA's alleged August 2026 Articles 35/38 policy submission; the 28 August Applicant 23 document is a case filing, not evidence of a CPD contribution.

Table A2. Source and authority register

ID	Source and date	Document or link	What it supports and limitation
I01	ARGA outgoing supplement — Applicant 01	25 Mar 2026; CCF/135/R1550.25	Three new Russian-proceeding decisions were transmitted to CCF; underlying documents must be checked against the case file.
I02	CCF reply — Applicant 01	7 May 2026	CCF confirmed transmission to General Secretariat for information/action and possible compliance checks; no review outcome or data change confirmed.

ID	Source and date	Document or link	What it supports and limitation
I03	CCF decision — Applicant 09	6 Oct 2026; CCF/137/R1546.24; letter 2 Nov	Applicant-only CCF decision reviewed for the procedural outcome stated above; restricted reasoning is not reproduced in this edition.
I04	CCF decision — Applicant 10	6 Oct 2026; CCF/137/R1924.25; letter 3 Nov	Applicant-only CCF decision reviewed for the procedural outcome stated above; restricted reasoning is not reproduced in this edition.
I05	CCF access reply — Applicant 11	13 Nov 2026; AF-2026-733 / DU-2026-447	CCF letter says no Russian-origin data currently recorded and closes related deletion track; does not establish no historic record or national/bilateral data.
I06	ARGA annual report submission and CCF reply	6 Nov 2025 / 10 Nov 2025	To CCF@interpol.int; attachment Report ARGA.pdf. Exact reply confirms receipt, says it will be reviewed/considered, and says it was transmitted to General Secretariat for information.
I07	ARGA mailbox targeted search set	2026 through 18 Nov 2026	162 unique message IDs; search yield, not a complete mailbox export or a case count.
I08	CCF portal sentbox snapshot	Observed 18 Nov 2026	13 visible submitted portal entries; not a count of people or incidents.
I09	ARGA Annual Analytical Report 2023–2025	5 Nov 2025	Prior report's approximately 100-case and ~70% economic-case figures are provisional pending row-level reconciliation and denominator confirmation.

ID	Source and date	Document or link	What it supports and limitation
P01	INTERPOL CCF Annual Activity Report 2024	Official report, §§13–18, 53–62, 73–75	https://www.interpol.int/en/content/download/23847/file/GA-2025-93-REP-09%20E%20AnnualActivityReportCCF_2024.pdf?inLanguage=eng-GB&version=8 — counts requests, not persons or notices. 50 cases were undecidable after total NCB non-cooperation, not merits findings.
P02	INTERPOL CCF Statute and legal documents	Current consolidated text / GA-2025-93-RES-08	https://www.interpol.int/Who-we-are/Legal-framework/Legal-documents — verify operative text for Articles 35, 38, 42 and 2025 amendments.
P03	INTERPOL About the CCF	Official public page	https://www.interpol.int/en/Who-we-are/Commission-for-the-Control-of-INTERPOL-s-Files-CCF/About-the-CCF — remit, including direct NCB-to-NCB boundary.
P04	INTERPOL About Notices	Official public page	https://www.interpol.int/en/How-we-work/Notices/About-Notices — notices, diffusions and NDTF review.
P05	INTERPOL Compliance and review	Official public page	https://www.interpol.int/en/How-we-work/Notices/Compliance-and-review — compliance checks and cancellation communications; does not confirm an individual national update.

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P06	INTERPOL Red Notices	Official public page	https://www.interpol.int/en/How-we-work/Notices/Red-Notices — explains cancellation and requests that member countries remove national copies.
P07	INTERPOL CCF FAQ — revision	Official public page	https://www.interpol.int/en/Who-we-are/Commission-for-the-Control-of-INTERPOL-s-Files-CCF/Frequently-Asked-Questions — verify current six-month Article 42 rule against operative Statute.
P08	INTERPOL How to submit a CCF request	Official public page	https://www.interpol.int/Who-we-are/Commission-for-the-Control-of-INTERPOL-s-Files-CCF/How-to-submit-a-request — portal-only intake from 26 Mar 2026.
P09	INTERPOL Rules on the Processing of Data	2023 official text	https://www.interpol.int/content/download/5694/file/26%20E%20RulesProcessingData_RPD_2023.pdf — confirm amendments when applying the current consolidated rules.
P10	INTERPOL CPD civil-society call	Official page	https://www.interpol.int/en/Who-we-are/Legal-framework/Call-for-contributions-from-Civil-Society-to-the-Committee-on-the-Processing-of-Data — raises confidentiality and reasoned decision issues; ARGA August 2026 submission not located.
J01	Khokhlov v Cyprus, ECtHR 53114/20	13 Jun 2023	https://hudoc.echr.coe.int/?i=001-225223 — official court record; keep judicial outcome separate from CCF compliance.

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J02	WS v Germany, CJEU C-505/19	12 May 2021, ECLI:EU:C:2021:376	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62019CJ0505 — EU safeguards in Red Notice context.
J03	German Federal Constitutional Court 2 BvR 1832/19	4 Dec 2019	https://www.bundesverfassungsgericht.de/SharedDocs/Entscheidungen/DE/2019/12/rk20191204_2bvr183219.html — national judicial review in a Red Notice context; check holding before quotation.
S01	Freedom House, "TNR Watch: Interpol on Notice"	11 Jul 2024	https://freedomhouse.org/ — secondary lead on Hniot and Hasan; underlying CCF/court records were not retrieved and cases are excluded from confirmed counts.
J04	OLG Nürnberg cases concerning Applicant 12 and Applicant 13	4 Feb 2026	Primary judgments not located in source set; legal grounds and channel remain unverified. Excluded from findings of INTERPOL non-compliance.