

JOINT UPR SUBMISSION – TAJIKISTAN – NOVEMBER 2021

A. Introduction

1. Lawyers for Lawyers (“L4L”) and the International Bar Association’s Human Rights Institute (“IBAHRI”) submit this report on the state of human rights in Tajikistan, especially in respect of the legal profession, with recommendations for the 38th session of the Universal Periodic Review (“UPR”) Working Group in the UN Human Rights Council in October 2021.
2. L4L is an independent and non-political foundation based in the Netherlands, which was established in 1986 and is funded by lawyers’ donations. L4L promotes the proper functioning of the rule of law through the free and independent exercise of the legal profession around the world. L4L has had special consultative status with ECOSOC since 2013.
3. The International Bar Association (“IBA”), established in 1947, is the world's leading organisation of international legal practitioners, bar associations and law societies. The IBA influences the development of international law reform and shapes the future of the legal profession throughout the world. It has a membership of 80,000 individual lawyers and more than 190 Bar Associations and Law Societies, spanning all continents. The IBA's Human Rights Institute, an autonomous and financially independent entity, works with the global legal community to promote and protect human rights and the independence of the legal profession worldwide.

B. Executive Summary

4. This submission highlights key concerns regarding Tajikistan’s compliance with its international human rights obligations to guarantee the right to independent counsel as set out in the UN Basic Principles on the Role of Lawyersⁱ (“UN Basic Principles”) and other international human rights instruments, focusing on the lack of effective guarantees for the functioning of lawyers, including the lack of freedom of expression and association of lawyers.

C. Normative and institutional framework of the State

5. The adequate protection of human rights and fundamental freedoms requires that every citizen has effective access to justice and legal assistance. Legal assistance can only be provided effectively in a judicial system where lawyers, along with judges and prosecutors, are free to carry out their professional duties independently of the government and political pressure. This follows, *inter alia*, from the Charter of the United Nations, the Universal Declaration of Human Rights, and the International Covenant on Civil and Political Rights (“ICCPR”).
6. Furthermore, on 22 June 2017, the Human Rights Council (“HRC”) passed a resolution condemning in general “*the increasingly frequent attacks on the independence of [lawyers], in particular threats, intimidation and interference in the discharge of their professional functions*”. The HRC expressed its deep concern “about the significant number of attacks against lawyers and instances of arbitrary or unlawful interference with or restrictions to the free practice of their profession” and called upon States “to ensure that any attacks or interference of any sort against lawyers are promptly, thoroughly and impartially investigated and that perpetrators are held accountable”.ⁱⁱ



7. In its task of promoting and ensuring the proper role of lawyers, the Government of Tajikistan should respect the UN Basic Principles within the framework of its national legislation and practice. The UN Basic Principles provide a concise description of international standards relating to key aspects of the right to independent counsel. Adherence to the UN Basic Principles is considered a fundamental pre-condition to fulfilling the requirement that all persons have effective access to legal services provided by an independent legal profession.ⁱⁱⁱ
8. During the UPR 2nd cycle in 2016, Tajikistan received^{iv} and accepted^v recommendations concerning the need to ensure that lawyers have the freedom to exercise their professional duties by guaranteeing unhindered access to their clients, freedom to represent their clients without threats from state or other actors and that such threats are properly investigated (**118.38**); also to refrain from and prevent any executive interference with lawyers' conduct of their professional duties (**118.39**).
9. Further it received **(4)** and accepted **(5)** a recommendation to provide human rights defenders, including defence attorneys and political figures detained as a result of their political activities such as Buzurgmehr Yorov, Shuhrat Kudratov and Ishok Tabarov and his sons with fair, open and transparent trials, including the substantive protections and procedural guarantees in accordance with Tajikistan's international obligations (**118.67**).
10. Tajikistan rejected a recommendation to make the necessary amendments to the Law on "Advokatura" of 2015 in order to remove any obstacle to the independence of the profession of a lawyer (**118.40**) on account of the imprecision of its content, noting that Tajikistan has created the necessary conditions to ensure the independence of the legal profession.
11. In its mid-term report for the assessment on the implementation of recommendations made during the UPR in 2016, Tajikistan stated that it has taken steps to develop the programmes for judicial and legal reform and that the deadlines for the next programme have been set to 2019-21. It also stated that representatives of the civil society in Tajikistan are to some extent involved in various working groups established to improve the relevant legislation. It accepted 158/208 of the recommendations and is working on the implementation thereof.^{vi}
12. However, reports gathered by L4L and IBAHRI, including information received from lawyers in Tajikistan, demonstrate that Tajikistan does not uphold the necessary guarantees for the proper functioning of the legal profession as set out in the UN Basic Principles. Consequently, lawyers encounter serious difficulties in carrying out their professional duties independently. This also undermines the proper functioning of the judicial system, including the right to a fair trial and effective access to justice.

D. No Effective Guarantees for the Functioning of Lawyers^{vii}

a) Improper interference by law enforcement agencies with the rights of lawyers

13. In Tajikistan, lawyers have faced significant constraints when exercising their profession in recent years. The rights and privileges of lawyers, and their clients, have not been guaranteed, and lawyers have sometimes been subject to harassment and improper interference by law enforcement state agencies.^{viii}

13.1 Access to clients in detention



The UN Basic Principles provide that governments “*shall ensure that all persons arrested or detained, with or without criminal charge, shall have prompt access to a lawyer, and in any case not later than forty-eight hours from the time of arrest or detention*”.^{ix} In addition, the UN Basic Principles provide that “*All arrested, detained or imprisoned persons shall be provided with adequate opportunities, time and facilities to be visited by and to communicate and consult with a lawyer, without delay, interception or censorship and in full confidentiality*”. Such access may serve as a preventive measure against ill-treatment, coerced self-incriminations and confessions or other violations of the rights of the suspect.^x

Article 53 of the Criminal Procedure Code (“CPC”) and Article 9 of the 2015 Law “On Advokatura and Advocates’ Activities” (the “Law On Advokatura”) establish a lawyer’s right to meet with his or her clients. The law establishes that a lawyer needs to provide lawyer’s authorisation and ID in order to meet with clients in detention confidentially without any restriction on the number and length of the meetings^{xi}. According to our information, however, lawyers are regularly prevented from meeting with their clients even though they have duly presented the required two documents. A permit issued by an investigator may also be required.^{xii} If the investigators reject the request or delay responding, lawyers have no access to their clients. Such bureaucratic or unjustified restrictions or even abuse of power limit lawyers’ access to their clients.

13.2 Lack of lawyer-client confidentiality during meetings with clients in detention

The UN Basic Principles provide that “*Governments shall recognize and respect that all communications and consultations between lawyers and their clients within their professional relationship are confidential*”^{xiii}. In addition, the UN Basic Principles provide that “*All arrested, detained or imprisoned persons shall be provided with adequate opportunities, time and facilities to be visited by and to communicate and consult with a lawyer, without delay, interception or censorship and in full confidentiality*” and that “*such consultations may be within sight, but not within the hearing, of law enforcement officials*”^{xiv}.

However, lawyers from Tajikistan have reported that insufficient measures are taken by prison personnel to guarantee the confidential nature of the meetings of lawyers with their clients. Meetings with clients in detention are sometimes attended by prison personnel, violating the principle of confidentiality.

Furthermore, Article 11(4) of the Law On Advokatura revokes the lawyer-client privilege by providing that no information on cases related to terrorism, extremism or money laundering constitutes lawyer’s privilege, and that a lawyer must report this information to government agencies. The provision further states that failure to report such information will result in criminal prosecution. This provision is contrary to the lawyer-client privilege principle and therefore must be removed.

13.3 No accountability for interference with lawyers’ activities

As shown in practice , various law enforcement agencies regularly intervene in or restrict the daily work of lawyers in Tajikistan. Lawyers are requested to provide copies of their agreements with clients and the fee amount; their clients are pressured into declining the services of their lawyers; lawyers are not given enough

time to prepare for cases, they are not allowed to make copies of the documents for their cases, or not given access to the case file at all; their requests to investigators and/or judges go unaddressed; lawyers' are not allowed to bring and use such devices as phones or computers to courts or detention facilities in order to facilitate their work. Although these practices are contrary to the principle of equality of arms and to the right to an effective defence, they go unaddressed and with no accountability.

According to the Law On Advokatura, "interference with the lawyers' activity carried out in accordance with the legislation of the Republic of Tajikistan or impeding such activity in any way is prohibited". However, there is no national legal provision establishing responsibility for such an illegal act. As a result, actions or activities carried out by any stakeholders which target lawyers or restrict their professional activities go completely unsanctioned and unpunished.

b) Intimidation and harassment, including judicial harassment, of lawyers

14. Article 16 of the UN Basic Principles states that "*Governments shall ensure that lawyers are able to perform all of their professional functions without intimidation, hindrance, harassment or improper interference (...) and shall not suffer, or be threatened with, prosecution or administrative, economic or other sanctions for any action taken in accordance with recognized professional duties, standards and ethics*".
15. According to our information, lawyers in Tajikistan have faced significant persecution for their involvement in politically sensitive cases. This interference comes in the form of intimidation and other threats against numerous attorneys (and their families), typically in retaliation for representing political opponents or expressing a willingness to take on politically sensitive cases.
16. In 2018, the United Nations Committee Against Torture ("CAT"), in its concluding observations on the third periodic report of Tajikistan, expressed deep concerns about allegations that individuals who complain of torture, including lawyers representing victims of torture, frequently face reprisals by officials of the State party. In particular, the Committee expressed deep concerns at "*the absence of response to requests for information regarding its efforts to investigate allegations that several human rights lawyers in the country appear to have been subjected to arrest after agreeing to represent high-profile clients in detention, who seemed to face a particularly acute risk of torture*".^{xv} Furthermore, in November 2020, the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment, the Working Group on Arbitrary Detention ("WGAD"), and the Special Rapporteur on the independence of judges and lawyers stated that they were "... seriously concerned at the *intimidation and harassment of dissidents and their families and lawyers, which appears to be in relation to their association to the IRPT. It is a worrying pattern of interference by the government into the independence of lawyers and which also can amount to cruel, inhuman or degrading treatment or to torture as described in article 1 of the CAT and in line with the Human Rights Council resolution (see Res 16/23, para 8)*".^{xvi}

c) Lawyers' identification with their clients and clients' causes

17. Often lawyers working on sensitive cases are threatened with disciplinary, administrative and even criminal charges for doing their work. They are often unofficially invited for meetings at law enforcement agencies or security agencies, where they are threatened



not to take up certain cases. Lawyers who take up politically sensitive cases, including cases related to national security and counter-terrorism, appear to be in particular danger.

18. Based on the definitions of terrorism and extremism in the Tajik legislation, lawyers who defend clients charged with the crimes of terrorism or extremism may become the subject of criminal prosecutions for the same or similar crimes themselves, as was the case with the lawyers Buzurgmehr Yorov and Nuriddin Makhkamov. The cases listed below illustrate a pattern of lawyers' being persecuted in Tajikistan for their activities in defence of their clients and lawyers' identification with their clients and clients' causes:

- (i) **Buzurgmehr Yorov**, one of Tajikistan's most eminent human rights lawyers, was arrested in September 2015 just after he had started to represent 13 senior leaders of the Islamic Renaissance Party of Tajikistan (IRPT), a group later banned as a terrorist organisation. After a number of closed trials that ignored international due process standards, he is currently serving a 22-year prison sentence on charges of fraud, forgery, "arousing national, racial, local, or religious hostility", and extremism^{xvii}. On 12 June 2019, the WGAD issued an opinion calling for Yorov's immediate and unconditional release.^{xviii} The WGAD found that the Tajik Government had committed numerous violations of international law in arresting and detaining Yorov, had denied him the right to a fair trial and violated his freedom of expression and freedom of assembly.
- (ii) **Nuriddin Makhhamov**, a lawyer who worked for Yorov's law firm Sipar also represented members of the IRPT. In October 2015, he was arrested and charged with extremism-related charges. Sentenced to 21 years in prison he is still in prison in Vakhdat city.^{xix}
- (iii) **Jamshed Yorov**, Buzurgmehr Yorov's brother, took over his brother's cases after his arrest. He was himself arrested in August 2016 on suspicion of "dissemination of a state secret"^{xx}. Sentenced to 21 years in prison he was later released on amnesty but was forced to flee Tajikistan in 2017 fearing harassment and re-arrest. He now lives in political exile.^{xxi}
- (iv) **Shukhrat Kudratov** was sentenced in January 2015 to nine years imprisonment in a strict penal colony on charges of fraud and bribery. At the time of his arrest in July 2014 he was a defence counsel for Zaid Saidov, a prominent opposition figure. Kudratov was arrested just days after he had sent an appeal to non-governmental organisations and diplomatic missions highlighting irregularities in the Saidov case. In his appeal he also spoke of intimidation, harassment and even death threats against him, his family and other lawyers working on the case.^{xxii}

On 24 August, 2018 Kudratov was released after serving just over four years in detention. But since his release he has been banned from practicing law, has received regular visits from police officers and had his passport confiscated by the authorities after he began looking for work in Dushanbe.^{xxiii}
- (v) **Fakhriddin Zokirov** represented the former Tajik Minister of Industry , Zayd Saidov. He was detained and released on condition that he would no longer represent Saidov. As Zokirov did continue to work on Saidov's case, he was again arrested in August 2015, this time on extortion charges. He was again released in November 2015, after paying a 14,600 Somoni fine (approximately

US\$2,000).^{xxiv}

- (vi) **Ishok Tabarov** together with the lawyers Shuhrat Kudratov and Fakhriddin Zokirov represented Zayd Saidov, the former Minister of Industry and the leader of the unregistered New Tajikistan opposition party. As a result of his legal work, his family was targeted: his two sons were charged and convicted on bogus charges of extremism. Tabarov died of a heart attack after his second son was arrested.^{xxv}
- (vii) **Abdulmajid Rizoev** is a human rights activist, lawyer and former employee of the Young Lawyers Association Amparo, which was forcibly liquidated in 2012. As part of his human rights activities, Rizoev monitors human rights violations in the armed forces of Tajikistan during conscription and military service, and provides legal advice to conscripts and soldiers, including those who have been subjected to physical and psychological violence. In recent years, he has also actively defended the rights of Dushanbe residents, whose houses are subject to demolition in connection with the implementation of new construction projects. Rizoev was arrested in November 2020 for a couple of social media posts, on charges of extremist activity using the mass media and Internet. If convicted, he faces up to 10 years imprisonment.^{xxvi}

E. Independence of the legal profession

- a) **Concerns that the institutional independence of the legal profession in Tajikistan is not fully guaranteed**
- 19. In 2015 the Law On Advokatura was introduced, which established a unified self-governing Bar Association representing all lawyers in Tajikistan. However, there are concerns that the institutional independence of the legal profession in Tajikistan is not fully guaranteed.
- 20. Some institutions of the Bar Association are dependent on the Ministry of Justice of Tajikistan, for example the Qualification Commission.^{xxvii} This Commission regulates the entry of lawyers to the legal profession. Furthermore, the Law On Advokatura contains a requirement that all lawyers must re-qualify every five years and this re-qualification is carried out by the Qualification Commission.^{xxviii} The Qualification Commission is chaired by a Deputy Minister of Justice ex officio^{xxix} and all sessions of the Commission are convened by the Deputy Minister of Justice.^{xxx} Lawyers' associations should have sufficient powers to be effective in protecting the independence of the profession. However, the prominent role of a member of the executive in the Qualification Commission could make the legal profession vulnerable to interference.
- 21. The UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression reported, after his mission to Tajikistan that, according to a number of lawyers and activists with whom he met, the Law On Advokatura has put further pressure on the independence of lawyers. It empowers the Ministry of Justice to act as a licensing body requiring all lawyers to renew their accreditation and go through a new examination process, which must be redone every five years. It was reported that the test contained subjects unrelated to law, including political and historical questions.^{xxxi}



b) Number of practising lawyers in Tajikistan

22. Following the introduction in 2015 of the Law On Advokatura, lawyers were obliged to sit exams set by the Ministry of Justice to enter the newly established Bar Association. The UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression reported after his mission to Tajikistan that “*as a result of the implementation of the Act, reportedly only about 30 per cent of the lawyers who were practising before the Act was passed are still in practice*”.^{xxxii}
23. In 2018, the UN Committee Against Torture expressed concern that “*amendments to the Bar and Advocacy Act (i.e. the Law On Advokatura) have given the Ministry of Justice undue influence over the qualifications commission responsible for licensing lawyers and have led to a dramatic drop in the number of lawyers in the country, and that these developments are impeding the States party’s ability to ensure that all people deprived of their liberty are able to access fundamental legal safeguards against torture and ill-treatment — including prompt access to an independent lawyer — in practice*”.^{xxxiii}
24. Today, the number of practicing lawyers still remains very low – there are only 823 lawyers registered for a population of 9.3 million. The number of lawyers is particularly low in certain regions: there are towns or villages in Tajikistan where no lawyer is available. Such situation appears to be to the detriment of an effective access to justice for everyone in need of legal representation.

F. Recommendations to the Government of Tajikistan:

- Take immediate measures to ensure that sufficient safeguards are in place, both in law and in practice, to guarantee the full independence and safety of lawyers and their effective protection against any form of retaliation in connection with their professional activity.
- Immediately take effective measures necessary to ensure that harassment, intimidation and other violations against lawyers are effectively investigated and publicly condemned at all levels, and that the perpetrators of such acts are prosecuted.
- Refrain from any actions that may constitute harassment, persecution, or undue interference in the work of lawyers, including their criminal prosecution on improper grounds such as the expression of critical views or the nature of the cases that the lawyer is involved in.
- Immediately and unconditionally release Buzurgmehr Yorov and Nuriddin Makhamedov and drop all charges against them.
- In consultation with the Bar Association and with individual lawyers, reform the Law On Advokatura to properly safeguard the lawyer-client principle, and remove any role for the Ministry of Justice in the governance of the legal profession, including in the Qualification Commission.



- In cooperation with the Bar Association take measures to enable a marked increase in the number of individuals qualifying to practise as lawyers, including in rural areas.
- To continue to implement in legislation as well as in practice recommendations of the UPR-cycle in 2016 to ensure the protection of lawyers against undue interference in their work.
- To take measures to ensure that law enforcement agencies in Tajikistan cease any illegitimate interference with lawyers' activities. Cases of improper and illegal interference with the work of lawyers should be punishable under national law.

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- i Basic Principles on the Role of Lawyers, adopted by the Eight United Nations Congress on the Prevention of Crime and the Treatment of Offenders, Havana, Cuba, 27 August - 7 September 1990.
- ii UN Human Rights Council, Independence and impartiality of the judiciary, jurors and assessors, and the independence of lawyers, A/HRC/RES/35/12, 22 June 2017, http://ap.ohchr.org/documents/dpage_e.aspx?si=A/HRC/35/L.20.
- iii During its 25th session (2 – 13 May 2016), the Human Rights Council adopted without a vote a resolution on the independence and impartiality of the judiciary, jurors and assessors, and the independence of lawyers. While recalling the Basic Principles on the Role of Lawyers and condemning the increasingly frequent attacks on the independence of lawyers, in particular threats, intimidation and interference in the discharge of their professional functions, the Human Rights Council reminded all States of their duty "to uphold the integrity of [lawyers] and to protect them, as well as their families and professional associates, against all forms of violence, threat, retaliation, intimidation and harassment resulting from the discharging of their functions, and to condemn such acts and bring the perpetrators to justice". See UN Human Rights Council, Independence and impartiality of the judiciary, jurors and assessors, and the independence of lawyers, A/HRC/RES/29/6, http://ap.ohchr.org/documents/dpage_e.aspx?si=A/HRC/29/L.11.
- iv A/HRC/33/11/Add.1 Report of the Working Group on the Universal Periodic Review of Tajikistan, A/HRC/WG.6/25/L.8 20 May 2016 p.23-25
- v Report of the Working Group on the Universal Periodic Review of Tajikistan, Addendum 1: Views on conclusions and/or recommendations, voluntary commitments and replies presented by the State under review, A/HRC/33/11/Add.1, 7 September 2016 p.4-6.
- vi Tajikistan National Standing Committee for Reporting and Follow Up Mid -term Report, available on BHR Идораи њуќӯки Ийсон ва Риояи Конуният Bureau of Human Rights and Rule of Law Бюро по правам человека и соблюдению законнос?
- vii Principles 16, 17, 18, 19, 20, 21, 22 of the Basic Principles.
- viii In April-May 2019, the IBAHRI, in cooperation with local civil society actors, conducted a wide survey of lawyers ("the Survey") to monitor the situation of the legal profession. The Survey was conducted in Dushanbe; the regions of Central Subordination; Autonomous Mountain Region Badakhshan; Khatlon region; Sogd region (Khujand, Panjakent; Istaravshan; Konibodom; Isfara; J. Rasulov and B. Gafuriv cities). 158 practising lawyers were interviewed.
- ix Principle 7 of the UN Basic Principles.
- x Human Rights Committee, General Comment No. 20 on article 7, par. 11.
- xi Law On Advokatura and Advocates' Activities , Article 9.
- xii IBAHRI Survey: More than 70% of the lawyers interviewed stated that they had not been allowed to see their clients in detention centres and temporary detention facilities if they had not presented an authorising letter from the investigator.
- xiii Principle 22 of the Basic Principles.
- xiv Principle 8 of the Basic Principles.
- xv Concluding observations on the third periodic report of Tajikistan, Committee against Torture, 18 June 2018, CAT/C/TJK/CO/3, par. 21.
- xvi Mandates of the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment; the Working Group on Arbitrary Detention; and the Special Rapporteur on the independence of judges and lawyers, AL TJK 1/2020, 4 November 2020, available on: <https://spcommreports.ohchr.org/TMResultsBase/DownLoadPublicCommunicationFile?gId=25677>
- xvii Lawyers for Lawyers, 'Letter on the continued detention of Buzurgmehr Yorov', 28 September 2020, available at: <https://lawyersforlawyers.org/letter-on-the-continued-detention-of-buzurgmehr-yorov/>



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- ^{xviii} Opinions adopted by the WGAD at its eighty-fourth session, 23 April–3 May 2019, Opinion No. 17/2019 concerning Buzurgmehr Yorov (Tajikistan), A/HRC/WGAD/2019/17.
- ^{xix} Lawyers for Lawyers, ‘Lawyers sentenced to 23 and 21 years in prison’, 17 October 2016, available at: <https://lawyersforlawyers.org/en/tajikistan-lawyers-sentenced-to-23-and-21-years-in-prison/>
- ^{xx} Lawyers for Lawyers, ‘Concern about arrest lawyer Jamshed Yorov’, 28 September 2016, available at: <https://lawyersforlawyers.org/en/tajikistan-concerns-about-arrest-lawyer-jamshed-yorov/>
- ^{xxi} Lawyers for Lawyers, ‘Tajikistan Sentencing of lawyer Sukhrat Qudratov’, 4 February 2015, available at: <https://lawyersforlawyers.org/en/tajikistan-sentencing-of-lawyer-sukhrat-qudratov/>
- ^{xxii} International Bar Association Human Rights Institute, ‘Sentencing of prominent human rights lawyer in Tajikistan of concern to IBAHRI’, 29 January 2015, available at: <https://www.ibanet.org/Article/NewDetail.aspx?ArticleUid=81c26e2d-821d-4036-b261-3bc978a8aa65>
- ^{xxiii} The Law Society of England and Wales, ‘Arrest and detention of lawyers in Tajikistan’, 26 November 2018, available at: <https://www.lawsociety.org.uk/campaigns/international-rule-of-law/intervention-letters/arrest-and-detention-of-lawyers-in-tajikistan>
- ^{xxiv} Lawyers for Lawyers, ‘Fakhriddin Zokirov’, available at: <https://lawyersforlawyers.org/en/lawyers/fakhriddin-zokirov/>
- ^{xxv} Joint submission of the International Bar Association Human Rights Institute (IBAHRI) and the International Commission of Jurists (ICJ) to the UN Human Rights Committee in view of the Committee’s examination of Tajikistan’s third periodic report under Article 40 of the International Covenant on Civil and Political Rights, 3 June 2019, para 31, available at: https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/TJK/INT_CCPR_CSS_TJK_35044_E.pdf
- ^{xxvi} Front Line Defenders, ‘Abdulmajid Rizoев facing trial on accusations of extremist activity on the internet’, 4 March 2021, available at: <https://www.frontlinedefenders.org/en/case/abdulmajid-rizoev-facing-trial-accusations-extremist-activity-internet>
- ^{xxvii} Law “On Advokatura and Advocates’ Activity”, Article 13(1).
- ^{xxviii} Ibid. Article 35
- ^{xxix} Ibid. Article 13(3)
- ^{xxx} Ibid. Article 13(5)
- ^{xxxi} Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression on his mission to Tajikistan, 13 October 2017, A/HRC/35/22/Add.2, para. 53.
- ^{xxxi} Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression on his mission to Tajikistan, 13 October 2017, A/HRC/35/22/Add.2, para. 53.
- ^{xxxiii} Committee against Torture, Concluding observations on the third periodic report of Tajikistan, 18 June 2018, CAT/C/TJK/CO/3, para. 19.

