

# Submission to the Committee of Ministers under Rule 9(2) concerning individual and general measures in

Volodina v Russia (No. 41261/17)

(Lack of remedies for domestic violence)

## Introduction

- 1. The European Court's judgment in *Volodina v Russia* became final on **4 November 2019**. The Russian authorities have not submitted an Action Plan to date.
- 2. The Court found that the Russian authorities had failed to protect the applicant from the violent actions of her former partner, and was the first judgment finding Russia responsible for gender-based discrimination against women due to the lack of effective remedies for domestic violence. The Court also found the Russian legal framework inadequate in the task of preventing, responding to and punishing domestic violence.
- 3. Since the *Volodina* judgment, the Court has handed down two more judgments on domestic violence in Russia,<sup>1</sup> and in June 2019, communicated four applications concerning domestic violence in Russia under the Court's "pilot judgment" procedure.<sup>2</sup>
- 4. The applicant in the *Volodina* case was subject to severe physical and psychological abuse that lasted over 2 years and which included:
  - On several occasions, she was severely beaten in her face, stomach, chest, legs, and strangled, with one of the beatings leading to a medically-induced abortion;
  - Her abuser placed a GPS-tracker in her purse, stalked her, and made numerous death threats against her and her son;
  - Her abuser posed as a potential employer and arranged, together with an accomplice, for the abduction of the applicant from Moscow after she had fled his abuse in Ulyanovsk (800 km away);
  - He cut the brakes of her car in an attempt on her life;

<sup>&</sup>lt;sup>1</sup> Barsova v Russia (No. 20289/10), Judgment of 22 October 2019; Polshina v Russia (no. 65557/14), Judgment of 16 June 2020.

<sup>&</sup>lt;sup>2</sup> *Tunikova v Russia* and three other applications (No. 55974/16), Communicated on 28 June 2019.

- He distributed her intimate photos without her consent on the internet (these actions are the subject of a second application at the European Court, Volodina v Russia (No. 2) (40419/19), communicated on 17 September 2019.
- 5. In its judgment the Court examined **seven episodes of violence**. Each one of them was documented and brought to the attention of the authorities, who consistently failed to act to protect the applicant from further violence or to punish the perpetrator. No criminal cases were initiated.
- 6. Since the entry into force of the judgment, the applicant has received new threats from her former partner.

#### 7. This submission has 3 sections:

- 1. We summarize the continuing inadequacy of the authorities' response, post-judgment, to the violence suffered by the applicant;
- 2. We make recommendations in relation to general measures in light of current Russian policy towards domestic violence.
- 3. We suggest questions to be posed to the Russian delegation concerning individual and general measures.

## <u>Section 1: The authorities' post-judgment response to the applicants'</u> complaints

## A. The Court's observations

- 8. The Court established that since 1 January 2016, the applicant had contacted the police in connection with seven episodes of violence and threats by her former partner, documented by medical evidence and witness testimonies, yet no criminal proceedings had been instituted in respect of any of them.<sup>3</sup> In addition to the obvious absence of political will or any kind of national policy to address the problem of domestic violence—which will be addressed in the proceeding section—the Court identified specific tactics on the part of the authorities which hindered an effective investigation, such as:
  - 1) The ineffectiveness of the practice of "pre-investigation checks" in domestic violence cases, which are incapable of leading to criminal charges that will be examined in court: the preliminary stage has too restricted a scope and cannot lead to the trial and punishment of the perpetrator, since the opening of a criminal case and a criminal investigation are prerequisites for bringing charges that may then be examined by a court.<sup>4</sup>
  - 2) The police were clearly **unwilling to initiate an immediate investigation** into the acts of violence committed against the applicant, even in cases where the applicant had sought help with obvious signs of bodily harm. For example,

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<sup>&</sup>lt;sup>3</sup> *Volodina v Russia,* paras. 87, 93, 11, 16, 19, 23, 27, 35 and 36.

<sup>&</sup>lt;sup>4</sup> Volodina, para. 95

- after beatings on 25 January 2016 and 18 May 2016, the authorities did not order a medical examination immediately after the incident.<sup>5</sup>
- 3) The authorities had not made a serious attempt to establish the circumstances of the attacks and had not taken into account the **systematic nature** of the violence as required in domestic violence cases.
- 4) Through various tactics, the authorities sought to **avoid bringing criminal charges**:
  - a. For example, after the authorities persuaded the perpetrator to repair the applicant's broken car window and to return her passport and belongings, the police stated that the crime had not occurred, as if nothing had happened. When the perpetrator cut the applicant's brake lines on her car, the police presented this as a minor act that caused material damage, i.e. not in the context of ongoing violence as a threat to the applicant's life.
  - b. The authorities consistently refused to accept the evidence submitted by the applicant as sufficient to initiate a criminal case by increasing the requirements. For example, despite the presence of obvious physical injuries, the authorities argued that a single punch was not prosecutable under Article 116 (Battery), which required that two or more blows be inflicted. Text messages containing death threats were not "sufficiently real and specific" to constitute an offence under Article 119 of the Criminal Code (threat of death or bodily harm).8

#### B. The current situation

- 9. Insofar as individual measures are concerned, the authorities have an obligation to effectively investigate the applicant's allegations, which the applicant requested soon after the judgment entered into force.<sup>9</sup>
- 10. 8 months since the entry into force of the Court's judgment, the crimes committed against her have not been investigated and the perpetrator has not been punished. Rather, the applicant has received 11 new refusals to initiate criminal proceedings from three different regional authorities.

<sup>&</sup>lt;sup>5</sup> *Volodina*, Para. 96.

<sup>&</sup>lt;sup>6</sup> Volodina, Para. 11 and 35.

<sup>&</sup>lt;sup>7</sup> Volodina, Para. 23-27

<sup>8</sup> Volodina, Para. 19, 23.

<sup>&</sup>lt;sup>9</sup> On 16 December 2019, SJI sent a letter to the Department of the Ministry of Internal Affairs of the Russian Federation for the Ulyanovsk Region, the Investigative Directorate of the Investigative Committee of the Russian Federation for the Ulyanovsk region, the Prosecutor's Office of the Ulyanovsk region, the Ministry of Internal Affairs of the Russian Federation, the Investigative Committee of the Russian Federation, the Prosecutor General's Office of the Russian Federation and the Ministry of Justice of the Russian Federation, by which we informed the authorities that the judgment in the case had become final and requested that criminal proceedings be initiated against the applicant's former partner. We also requested that the authorities evaluate the findings of the European Court of Human Rights and report on the measures taken to implement the judgment (see Attachment 1). On 26 December 2019 the General Prosecutor's Office of Russia replied that our letter had been forwarded to the Prosecutor's Office of the Ulyanovsk Region (see Attachment 2).

- 11. The various violent episodes to which the applicant was subjected took place in several regional jurisdictions and included beatings and strangulation, abduction and kidnapping, death threats, and stalking. Some of the crimes, including kidnapping, were committed by one or more persons as an organized group. While there may be some objective difficulties in investigating these crimes, the main obstacles to an effective investigation remain:
  - The lack of a coordinated approach: instead of combining all of the episodes into one investigation, as would be appropriate in a case concerning long-term domestic violence and stalking, the authorities continue to examine each episode separately, which both ignores the seriousness of the campaign of violence and harassment committed against the applicant, and impedes an adequate assessment of the crimes committed.
  - 2) Even some of the most serious charges have not been investigated, for example, the kidnapping of the applicant in January 2016, which was clearly planned and organized in advance with the help of at least one accomplice: The applicant had moved to Moscow from Ulyanovsk, put her CV on a head-hunting website, and was approached by a potential "employer" about a job interview. She was picked up for the "interview" in a car by the accomplice, who drove her to where the perpetrator was planning to abduct her. There, she was physically assaulted and forcibly taken back to Ulyanovsk. The accomplice to this scheme has still not been identified or questioned by the authorities.
  - 3) A lack of suitable legal framework, including the decriminalization of the crime of assault in Russian legislation as of 1 January 2017. For example, two of the replies received from the authorities of 17 April and 27 May 2020 (see below paras. 16 and 18) cite the decriminalization of assault as grounds for refusing to initiate criminal proceedings against the perpetrator. As noted above, however, many of the episodes merit a more serious charge than that of assault.
  - 4) A lack of interest or lack of knowledge on the part of the authorities in how existing criminal provisions could be brought to bear in this case, leading to inertia regarding basic investigative actions, such as questioning the perpetrator (see below para. 16, reply from the Zavolzhskiy District of Ulyanovsk of 15 June 2020), although there is no indication that the perpetrator is not currently in Russia.
- 12. As stated above, since 30 November 2019, the applicant has received 11 notifications of refusals to open a criminal case from 3 different regional authorities in Moscow, Ulyanovsk and Samara region. The applicant also requested the assistance of federal bodies and agencies to coordinate the investigation. Despite their response, no investigation was carried out. A summary of the replies received from the authorities is provided below.
- ⇒ Moscow: 3 refusals to open a criminal case

- 13. Refusals to open criminal proceedings into episodes of violence committed against the applicant were received from three different district prosecutors' offices: on 30 November 2019, 10 28 February 2020 11 and 14 July 2020. 12 These refusals concerned facts relating to the applicant's allegations of intentional property damage, threats of causing serious bodily harm, unlawful entry into her car, the infliction of bruises, as well as the placement of an unidentified object in the applicant's belongings.
- 14. Sometimes, a supervising prosecutor overturned the refusal, <sup>13</sup> but this made no different in practice.
- 15. The applicant's counsel twice requested the Department of the Ministry of Internal Affairs of Russia for the Mozhaisk district of Moscow to allow access to the materials of the pre-investigation inquiries concerning the alleged attempt on the applicant's life in August 2016, when her abuser cut the break lines of her car.<sup>14</sup>

## ⇒ Ulyanovsk region: 6 refusals to open a criminal case

- 16. The applicant was informed of decisions not to open a criminal case on six different occasions: on 17 January 2020 (concerning bodily injuries and theft of property), <sup>15</sup> 21 February 2020 (concerning property damage, assault and death threats), <sup>16</sup> 6 March 2020, <sup>17</sup> 30 March 2020, <sup>18</sup> 17 April 2020 (concerning beating which led to a medically-induced abortion), <sup>19</sup> and 15 June 2020 (concerning death threats, which could not be established because the authorities had failed to interview the perpetrator). <sup>20</sup>
- 17. On 17 February 2020, the applicant's representative complained to the Ministry of Interior of Ulyanovsk Region about the failure of the Zavolzhskiy District Ministry of Interior to provide the materials from the pre-investigation inquiries concerning unlawful actions committed against the applicant.<sup>21</sup>
- ⇒ Samara region: 2 refusals to open a criminal case.
- 18. The applicant received two refusals to open a criminal case: on 14 April 2020 (concerning a complaint of being punched in the face, thrown to the ground, and

<sup>&</sup>lt;sup>10</sup> Resolution No. 320490 of 30 November 2019 on refusal to institute criminal proceedings, Attachment 3.

<sup>&</sup>lt;sup>11</sup> Letter from the Kuntsevsky District Procurator's Office of Moscow of 14 April 2020, Attachment 4.

<sup>&</sup>lt;sup>12</sup> Letter from the DMIA for the Mozhaisk District of Moscow of 14 July 2020, Attachment 5.

<sup>&</sup>lt;sup>13</sup> Letter from the Moscow City Prosecutor's Office of 15 April 2020, Attachment 6.

<sup>&</sup>lt;sup>14</sup> Counsel's motion of 3 February 2020 (Attachment 7) and Motion of 15 June 2020 (Attachment 8).

<sup>&</sup>lt;sup>15</sup> Letter from the Ulyanovsk region Ministry of Internal Affairs of 17 January 2020, Attachment 9.

<sup>&</sup>lt;sup>16</sup> Decision of 21 February 2020 Resolution, Attachment 10.

<sup>&</sup>lt;sup>17</sup> Reply from the Department of the Ministry of Internal Affairs for the Ulyanovsk Region of 6 March 2020, Attachment 11.

<sup>&</sup>lt;sup>18</sup> Letter from the Department of the Ministry of Internal Affairs for the Ulyanovsk Region of 30 March 2020, Attachment 12.

<sup>&</sup>lt;sup>19</sup> Letter from the Prosecutor's Office of Ulyanovsk region of 17 April 2020, Attachment 13.

<sup>&</sup>lt;sup>20</sup> Letter from the Ministry of Internal Affairs of Russia for the Zavolzhskiy district of Ulyanovsk of 15 June 2020, Attachment 14

<sup>&</sup>lt;sup>21</sup> Letter of 17 February 2020, Attachment 15.

strangled),<sup>22</sup> 27 May 2020 (among other things, the refusal was based on the decriminalization of assault in Russian legislation in 2019).<sup>23</sup> She was also notified that the refusal had been overturned several times,<sup>24</sup> but this had no effect in practice.

## $\Rightarrow$ Federal bodies and agencies

- 19. Since the entry into force of the ECtHR judgment, the applicant has appealed to several federal law-enforcement and executive agencies to appeal for help in implementing the judgment and in ensuring her safety, including the Presidential Administration,<sup>25</sup> the Committee on Family and Women's Issues of the State Duma of the Russian Federation,<sup>26</sup> the Ministry of Internal Affairs and the General Prosecutor's Office (concerning four separate episodes, including kidnapping by two persons).<sup>27</sup>
- 20. On 3 and 5 March 2020, the applicant received replies from the State Duma according to which her statements had been forwarded to the General Prosecutor and his deputy. <sup>28</sup> On 6 and 13 March 2020, the applicant was informed by the Prosecutor General's Office that the Prosecutor's Offices in Moscow, Ulyanovsk and Samara had been instructed to carry out checks on the circumstances of her complaints and that the situation had been put under the control of the General Prosecutor's Office. <sup>29</sup> On 17 March 2020, the applicant was additionally informed by the General Prosecutor's Office that her complaint regarding the failure of lawenforcement agencies to take action following her reports of crimes committed against her, together with the appeal of a State Duma deputy, Ms. Oksana Pushkina, had been considered and that instructions had been given to the Ulyanovsk and Samara Region Prosecutor's Offices to organize checks on the information contained in the applicant's complaint. <sup>30</sup>
- 21. Indeed, the General Prosecutor responded quickly to the applicant's complaint—undoubtedly, the fact that they were accompanied by an appeal from a State Duma member played an important role. Yet, regardless, subsequent refusals to open criminal proceedings at the regional level in Moscow, Ulyanovsk and Samara show that this had little practical effect.

<sup>&</sup>lt;sup>22</sup> Letter from the Ministry of Internal Affairs of 14 April 2020, Attachment 16.

<sup>&</sup>lt;sup>23</sup> Letter from the Department of the Ministry of Internal Affairs of Russia for Stavropol District of 27 May 2020, Attachment 17.

<sup>&</sup>lt;sup>24</sup> Letter from the Prosecutor's Office of Samara Region of 21 April of 2020, Attachment 18.

<sup>&</sup>lt;sup>25</sup> Letter to the Presidential Administration of Russia, 21 January 2020, Attachment 19.

<sup>&</sup>lt;sup>26</sup> Applicant's letter of 11 February 2020, Attachment 20.

<sup>&</sup>lt;sup>27</sup> Statement to the MIA of 18 February 2020 (Attachment 21) and Letter to the General Prosecutor's Office of 18 February 2020 (Attachment 22).

<sup>&</sup>lt;sup>28</sup> Letters from the State Duma of 3 and 5 March, Attachments 23, 24.

<sup>&</sup>lt;sup>29</sup> Responses from the General Prosecutor's Office of 6 and 13 March 2020, Attachment 25.

<sup>&</sup>lt;sup>30</sup> Letter from the General Prosecutor's Office of 17 March 2020, Attachment 26.

## **Section 2: General Measures: Recommendations**

- 22. In *Volodina v Russia*, the European Court made the following conclusions regarding Russia's **legal framework vis-à-vis domestic violence**: "The Russian legal framework which does not define domestic violence whether as a separate offence or an aggravating element of other offences and establishes a minimum threshold of gravity of injuries required for launching public prosecution falls short of the requirements inherent in the State's positive obligation to establish and apply effectively a system punishing all forms of domestic violence and providing sufficient safeguards for victims." <sup>31</sup>
- 23. In particular, the Court was struck by the absence of any mechanism similar to a "restraining" or "protection order" in Russian legislation: "...The continued failure to adopt legislation to combat domestic violence and the absence of any form of restraining or protection orders clearly demonstrate that the authorities' actions in the present case were not a simple failure or delay in dealing with violence against the applicant, but flowed from their reluctance to acknowledge the seriousness and extent of the problem of domestic violence in Russia and its discriminatory effect on women..."

## A. What do the authorities have to do?

- 24. With regard to general measures, the authorities are obliged to assess and modify current legislation and existing practices in order to render them effective at preventing and punishing domestic violence and to providing protection for victims.
- 25. In particular the applicant asserts that Russia must assess and modify the following shortcomings in its legal framework:
  - 1) There is no **definition of "domestic violence"** nor any legal consensus as to the scope of the acts that can fall under it;
  - 2) Several forms of domestic violence such as **stalking/persecution**, **economic** and **psychological violence** are not punishable under any legislative provisions;
  - 3) There is no specific criminal provision aiming to protect victims of domestic violence and prosecute offenders that adequately takes into account the specific features and dynamics of domestic violence;
  - 4) Existing criminal law provisions provide for public prosecution for violence in the public sphere, while relegating violence in the family sphere (minor harm to health, repeat battery and the first instance of battery) to a lesser category of private prosecution, which imposes an excessive burden on victims and often leads to repetitive psychological traumatization of the victim;
  - 5) Russian law establishes a minimum threshold of gravity of physical injuries required for launching a public prosecution;

<sup>32</sup> Volodina, para. 132

<sup>&</sup>lt;sup>31</sup> Volodina, para. 85

- 6) Victims cannot be provided with **protective or restraining orders owing to the absence** of such measures under Russian legislation.
- 26. Without any legislation defining domestic violence and without any regulation or indication from higher courts or investigative authorities of how existing Russian criminal and procedural law provisions should be applied in a gender-sensitive manner, victims of domestic violence face insurmountable obstacles to obtaining remedies. The attitude of law enforcement, investigative and prosecutorial bodies in Russia is characterized by an absolute lack of understanding and knowledge of the dynamics of domestic violence, its systematic nature, the varied forms of physical or psychological violence, its inherent risks and consequences.

## B. What are the authorities doing?

- 27. Since the decriminalization of assault in 2017, an intense public discussion has ensued over the need to increase protections for domestic violence victims. Several high-profile cases have contributed to this debate, including the *Volodina v Russia* judgment. Following the judgment, several high-ranking Russian politicians stated that it was finally time to pass domestic violence legislation.<sup>33</sup>
- 28. In November 2019, a **draft version** of a domestic violence bill was published for public commentary.<sup>34</sup> Unfortunately, the provisions of the draft law are regressive, and if adopted, the bill will not protect victims of domestic violence, and would certainly exclude from its ambit any person in a situation similar to the applicant in the *Volodina* case.
- 29. The draft law formulates domestic violence as "an intentional act (action or inaction), causing or containing a threat of causing physical and (or) mental suffering, and (or) property damage, but not containing elements of an administrative offense or criminal offense."<sup>35</sup> Thus the definition of "domestic violence" in the current version of the draft law completely excludes from legal protection all types of physical violence (beatings, bodily harm, etc.), since these types of violence always contain elements of an administrative offense or crime. The draft law does not establish or define other various forms of domestic violence (physical, psychological, sexual, economic), there is no definition of stalking or persecution, and the rights of victims are not determined. The law excludes from its ambit persons living in an unregistered marriage or those who are in an intimate partnership or in a dating relationship. While the draft law provides for protection/restraining orders for victims, these do not include restrictions on physical proximity to the victim. In

<sup>&</sup>lt;sup>33</sup> "The Federation Council assumes that criminal penalties may be introduced for domestic violence," Parlamentskaya Gazeta, 30 July 2019 (in Russian).

https://www.pnp.ru/social/v-sovfede-dopustili-vvedenie-ugolovnogo-nakazaniya-za-domashnee-nasilie.html <sup>34</sup> Проект Федерального Закона о профилактике семейно-бытового насилия в Российской Федерации (accessed 5 February 2020), <a href="http://council.gov.ru/media/files/rDb1bpYASUAxolgmPXEfKLUIq7JAARUS.pdf">http://council.gov.ru/media/files/rDb1bpYASUAxolgmPXEfKLUIq7JAARUS.pdf</a>.

<sup>&</sup>lt;sup>35</sup> Статья 2 проекта Федерального закона «Об основах профилактики семейно-бытового насилия» - «семейно-бытовое насилие — умышленное деяние (действие или бездействие), причиняющее или содержащее угрозу причинения физического, и (или) психического страдания, и (или) имущественного вреда, не содержащее признаки административного правонарушения или уголовного преступления.»

addition, the responsibility for their infringement is **limited to a fine**. The draft law also does not provide for obligatory training programs for police officers, prosecutors and other crucial actors who would be tasked with implementing the legislation.

30. In the advent of the outbreak of the Covid-19 pandemic in Russia and in spite of alarming—and documented<sup>36</sup>—signals that domestic violence was spiking in Russia (as it did everywhere else), Russian lawmakers nevertheless decided to **postpone debate on the domestic violence legislation until "after the pandemic."** A high-ranking Russian politician said that "there shouldn't be a spike in domestic violence [during the pandemic]. On the contrary, families are sticking together during this period."<sup>37</sup>

## C. Russian policy on domestic violence

- 31. At the policy level in Russia, the National Action Strategy for Women 2017-2022 and the Action Plan to implement the strategy are the only two federal-level policy documents that explicitly address the issue of violence against women, with special attention to domestic ("family") violence and sexual violence. The policy makes no mention of how violence against women is a product of inequality and discrimination; rather, the NASW describes VAW as an indication of social disadvantage and characterises it as a problem stemming from substance abuse.
- 32. As the Council of Europe expert report<sup>38</sup> concludes: "This approach is narrow and overlooks the fact that VAW reflects inequalities that take many forms, and, furthermore, that VAW perpetuates discrimination against women. Neither the NASW nor the Action Plan provide definitions of the terms 'violence against women' or 'domestic violence' that would indicate a recognition of the context in which VAW is perpetrated or take into consideration the experiences of victims/survivors. There is no state policy dedicated exclusively to VAW or to DV. Furthermore, while a draft law is pending approval, there are no definitions of VAW or DV in Russian legislation. In fact, the phrase 'domestic violence' only appears in a federal law on the provision of social services, but without a definition of the term."<sup>39</sup>

<sup>&</sup>lt;sup>36</sup> See Domestic violence in the age of COVID-19 in Russia - Submission on behalf of seven women's rights organisations, July 2020, <a href="https://srji.org/upload/medialibrary/fd8/GBV">https://srji.org/upload/medialibrary/fd8/GBV</a> in RUSSIA COVID 19.pdf (in English); <a href="https://zonaprava.com/download.php?file=6186">https://zonaprava.com/download.php?file=6186</a> (in Russian).

<sup>&</sup>lt;sup>37</sup> "Russia Seeks Protections for Domestic Abuse Victims During Coronavirus Lockdown," *Moscow Times*, 22 April 2020: <a href="https://www.themoscowtimes.com/2020/04/22/russia-seeks-protections-for-domestic-abuse-victims-during-coronavirus-lockdown-a70071">https://www.themoscowtimes.com/2020/04/22/russia-seeks-protections-for-domestic-abuse-victims-during-coronavirus-lockdown-a70071</a> (in English); <a href="https://tass.ru/obschestvo/8259403">https://tass.ru/obschestvo/8259403</a> (in Russian); <a href="https://tass.ru/obschestvo/8259403">https://tass.ru/obschestvo/8

<sup>&</sup>lt;sup>39</sup> See Council of Europe, RESEARCH ON PREVENTING AND COMBATING VIOLENCE AGAINST WOMEN AND DOMESTIC VIOLENCE INCLUDING IN SITUATIONS OF SOCIAL DISADVANTAGE IN THE RUSSIAN FEDERATION. Based on analysis of the Russian framework and compilation of good practices. April 2020. Pages 16-17.

- 33. In order to implement the National Action Strategy for Women and in particular to improve legislation on the prevention of domestic violence, a Co-ordination Council was established. **However, in over two years, this Council has met only once.**
- 34. Two of the activities in the Action Plan for the implementation of the NASW that address VAW (preparing proposals for the prevention of violence against women and developing informational and methodological materials for training law enforcement officials, employees of healthcare organisations and psychologists assisting women in crisis) are to be implemented by both federal bodies (i.e. relevant ministries, the Prosecutor General's Office) and regional authorities. However, the Action Plan does not explicitly require multi-agency co-operation in its implementation, either between the federal, regional and local levels or among all relevant stakeholders at any level.<sup>40</sup>

## Section 3: Suggested questions to the Russian Delegation

## Questions on individual measures

- 1) Why have the many episodes of assault and other crimes committed against the applicant not been integrated into one investigation?
- 2) Why has the accomplice to the abduction and kidnapping of the applicant from Moscow in January 2016 not been identified and questioned?
- 3) Why has the perpetrator identified by the applicant and the authorities not been located and questioned in person?

## Questions on general measures

- 1) When does Russia foresee returning to the discussion of domestic violence legislation at national level?
- 2) What changes does Russia foresee to its National Action Strategy in the Interests of Women pursuant to the conclusion of the Council of Europe project "Cooperation on the implementation of the Russian Federation National Action Strategy for Women (2017-2022)"?

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<sup>&</sup>lt;sup>40</sup> Ibid., page 19.

## **List of Attachments**

- 1. Implementation letter of 16 December 2019 (6 pp.)
- 2. Letter from the General Prosecutor's Office of 26 December 2019 (1 p.)
- 3. Resolution No. 320490 of 30 November 2019 on refusal to institute criminal proceedings (2 pp.).
- 4. Letter from the Kuntsevsky District Procurator's Office of Moscow of 14 April 2020 (2 pp.).
- 5. Letter from the DMIA for the Mozhaisk District of Moscow of 14 July 2020 (1 p.).
- 6. Letter from the Moscow City Prosecutor's Office of 15 April 2020 (1 p.).
- 7. Counsel's motion of 3 February 2020 (1 p.).
- 8. Motion of 15 June 2020 (1 p.).
- 9. Letter from the Ulyanovsk region Ministry of Internal Affairs of 17 January 2020 (1 p.).
- 10. Decision of 21 February 2020 Resolution (3 pp.).
- 11. Reply from the Department of the Ministry of Internal Affairs for the Ulyanovsk Region of 6 March 2020 (1 p.).
- 12. Letter from the Department of the Ministry of Internal Affairs for the Ulyanovsk Region of 30 March 2020 (2 pp.).
- 13. Letter from the Prosecutor's Office of Ulyanovsk region of 17 April 2020 (1 p.).
- 14. Letter from the Ministry of Internal Affairs of Russia for the Zavolzhskiy district of Ulyanovsk of 15 June 2020 (2 pp.).
- 15. Letter of 17 February 2020 (2 pp.).
- 16. Letter from the Ministry of Internal Affairs of 14 April 2020 (1 p.).
- 17. Letter from the Department of the Ministry of Internal Affairs of Russia for Stavropol District of 27 May 2020 (5 pp.).
- 18. Letter from the Prosecutor's Office of Samara Region of 21 April of 2020 (1 p.).
- 19. Letter to the Presidential Administration of Russia, 21 January 2020 (5 pp.).
- 20. Applicant's letter of 11 February 2020 (5 pp.).
- 21. Statement to the MIA of 18 February 2020 (4 pp.).
- 22. Letter to the General Prosecutor's Office of 18 February 2020 (4 pp.).
- 23. Letter from the State Duma of 3 March 2020 (1 p.).
- 24. Letter from the State Duma of 5 March 2020 (1 p.).
- 25. Responses from the General Prosecutor's Office of 6 and 13 March 2020 (2 pp.).
- 26. Letter from the General Prosecutor's Office of 17 March 2020 (1 p.).

Total: 26 Attachments on 57 pages.