

AGA SARKHANI



FACTS

Personal data:

1. Aga Sarkhani (DOB: 21 May 1970) was an Azerbaijani citizen born in Ganja. He was married, had secondary education and was unemployed.
2. Unlike several other defendants, Sarkhani had an identifiable religious-organizational connection: international human-rights reporting identified him as a member of the Muslim Unity Movement, the movement whose leadership had been prosecuted in the Nardaran case. The organization disputed any involvement by Sarkhani in Safarov's attack.¹
3. Sarkhani never stood trial in person. The judgment records that he died on 24 July 2018 during a law-enforcement operation.

Date and circumstances of death:

4. The official account alleged that police located Sarkhani in Baku, that he possessed a Makarov pistol, grenades and a knife, and that he opened fire on officers when they attempted to detain him. The authorities claimed that officers returned fire and killed him.²
5. His wife and legal successor, Sevinj Sarkhani, disputed the official account and repeatedly sought information about her husband's death. There were extraordinary difficulties concerning the return of his body: in February 2019, approximately seven months after the killing, his wife said that the body still had not been returned to the family and described repeated unsuccessful approaches to State bodies.³

Legal accusations:

6. Sarkhani was posthumously charged under Articles 29/120.2.1, .3, .4, .7, .10 and .11; 214.2.1, .3 and .6; 228.3; 28/277; 277; 278.2; 279.3; and 315.2.
7. The prosecution alleged that Sarkhani had provided accommodation to Safarov after his return from Iran, searched for weapons, participated in meetings and planning and shared the objective of assassinating officials and establishing a Sharia-based State.
8. Yet Safarov's own testimony at trial created a fundamental contradiction: Safarov stated that he did not know Ağa Sarkhani at all. This directly contradicted the prosecution's portrayal of Sarkhani as one of his close associates and organizers.

Legal status:

9. On 16 August 2021, the Baku Assize Court nevertheless found Sarkhani guilty of the alleged offences. Since he was dead, no punishment was imposed and the criminal proceedings were terminated on that ground.
10. His wife, as legal successor, sought an acquittal and termination on exonerating grounds. The Baku Court of Appeal rejected the appeals and left the first instance result unchanged on 15 April 2022.

Legal proceedings:

11. Sarkhani's inability to participate personally is particularly consequential because one of the prosecution's central premises (his supposed close association with Safarov) was expressly contradicted by Safarov himself at trial.
12. There was therefore no opportunity for Sarkhani to explain his Muslim Unity Movement membership, his alleged contacts with the other defendants, the alleged weapons or the circumstances in which police claimed to have found and killed him.
13. The proceedings were continued through his legal successor, who rejected the prosecution account and demanded exoneration. The first-instance court nevertheless accepted both the organized-conspiracy allegation and the official armed-resistance account.
14. The international Ganja investigation identified Sarkhani's death as one of several cases raising serious Article 2 concerns. It found reasonable grounds to question whether Azerbaijan had carried out prompt, independent, effective and transparent investigations of these deaths.⁴

LEGAL ANALYSIS

Reasons why Aga Sarkhani's case should be regarded as a politically motivated process:

15. Although Aga Sarkhani cannot technically be classified as a political prisoner under PACE Resolution 1900 (2012), because he was killed before trial and was therefore no longer deprived of liberty when the judgment was delivered, the circumstances surrounding the operation to apprehend him and the subsequent criminal proceedings provide substantial grounds to regard his case as politically motivated and instrumental to the authorities' construction of the Ganja events as an organised Islamist conspiracy against the State.
16. The prosecution did not concern merely an allegation that Sarkhani had assisted Yunis Safarov or possessed weapons. The authorities attributed to him the objectives of an extensive organised group allegedly seeking to commit terrorist attacks, assassinate State officials, forcibly alter Azerbaijan's secular constitutional order and establish a State governed according to Sharia law. The judgment incorporated his religious connections, foreign travel, alleged contacts with Safarov and other defendants, alleged weapons-related activity and the circumstances of his death into this single ideological and national-security narrative.

Aga Sarkhani's public profile:

17. Sarkhani was not a public opposition politician, journalist or civil-society activist. He was a resident of Ganja, married with two children, who had worked as a shoe trader at the Ganja market. According to his wife, he began practicing Islam while serving an earlier prison sentence. The international investigation into the Ganja crackdown identified Sarkhani as a member of the Muslim Unity Movement, an organization whose leadership and members had already been subjected to mass prosecution in the Nardaran cases.
18. His religious profile is particularly important because his family described a pre-existing pattern of police attention before the Ganja prosecution. During the appeal proceedings, the lawyer representing Sarkhani's wife stated that, according to Sevinj Sarkhani, whenever an incident occurred in Ganja the authorities would detain Aga because he was religiously observant. After the July 2018 events, Sarkhani reportedly told his wife that he did not want his name to become involved in the case and travelled to Baku, where he was subsequently killed. This evidence supports the conclusion that his religious affiliation was not incidental to the authorities' interest in him but formed part of the context in which he was identified as a suspect.
19. There is also an important objective fact concerning the attack itself: border-control records reproduced in the judgment show that Sarkhani left Azerbaijan for Iran on 2 July 2018 and returned on 4 July 2018. He was therefore outside Azerbaijan on 3 July 2018, when Safarov shot Elmar Valiyev and his bodyguard. This did not legally exclude the possibility that the authorities could investigate an alleged prior conspiracy, but it made particularly important the need for convincing individualized evidence that Sarkhani had planned, directed or knowingly assisted the attack.

The sequence of events:

20. Aga Sarkhani's prosecution should be assessed against a continuous pattern of politically instrumental criminal justice in Azerbaijan that continued throughout the history of this regime being in power. The most structured and consolidated repression has developed through successive and overlapping waves since at least 2013–2014. The targets and criminal accusations have changed over time from financial and tax offences against NGOs and human rights defenders, to terrorism and attempted-coup charges against religious groups, to organized-conspiracy cases following public disorder, and later to narcotics, smuggling, treason and other offences against journalists, activists and opposition politicians but the underlying pattern has remained strikingly consistent. The European Court of Human Rights has itself identified a “troubling pattern” of arbitrary arrest and detention of government critics through retaliatory prosecutions and misuse of criminal law, while the Parliamentary Assembly of the Council of Europe has concluded that Azerbaijan systematically uses the criminal justice apparatus against opposition politicians, civil-society activists, journalists, human-rights defenders and other perceived dissidents.⁵
21. The first decisive stage of the contemporary crackdown took place in 2013–2014, when the authorities moved against the institutional infrastructure of independent civil society. Leading human-rights defenders, lawyers, election monitors and journalists, including Anar Mammadli, Leyla and Arif Yunus, Rasul Jafarov, Intigam Aliyev and Khadija Ismayilova, were arrested or prosecuted on charges such as tax evasion, illegal entrepreneurship, abuse of office, fraud and, in some cases, treason. NGO offices were searched and sealed, bank accounts were frozen and organizations were deprived of access to funding. At least 40 activists, journalists and human-rights defenders were arrested or convicted in politically motivated cases in 2014 alone.⁶ At the same time, successive amendments to legislation governing NGOs, grants and foreign funding made lawful independent civil-society activity increasingly difficult. The Venice Commission criticized these restrictions, including excessive state supervision and interference with NGO autonomy.⁷
22. The partial release of prominent prisoners in late 2015 and 2016 did not mark an end to that crackdown. Their convictions generally remained in force, travel and professional restrictions persisted, and many organizations could not resume their previous activities. Human Rights Watch documented that some activists left Azerbaijan altogether, while organizations whose leaders had been released remained unable to register, obtain funding or function normally. Thus, the 2014 campaign achieved a structural result that survived the release of individual prisoners: much of the previously formalized, institutionally funded human-rights and NGO sector had been dismantled or forced into inactivity.⁸

23. The Nardaran case of 2015–2017 marked an important development in the methods of repression. Rather than relying principally on financial or regulatory charges, the authorities increasingly employed the language of terrorism, armed conspiracy and violent seizure of power. On 26 November 2015, security forces conducted a large armed operation in Nardaran and detained dozens of people, including Muslim Unity Movement leaders Taleh Bagirzade and Abbas Huseynov. Eighteen defendants in the principal case were subsequently sentenced to prison terms ranging from 10 to 20 years for offences including terrorism, attempted violent seizure of power, weapons offences and homicide. The proceedings were accompanied by extensive allegations of torture and coerced testimony. Amnesty International described the trial as failing to meet international standards, while PACE later noted allegations that witnesses withdrew incriminating statements because they had been obtained through torture and that the prosecution had failed to present sufficient individualized evidence against defendants.⁹
24. Repression continued through 2016 and 2017, demonstrating that there was no meaningful interval between the 2014 crackdown and the cases that followed. Ahead of the 2016 constitutional referendum, activists, opposition supporters and persons active on social media were prosecuted on drug-possession, illegal-business and administrative charges. In 2017, journalist Afgan Mukhtarli, who had continued reporting critically on Azerbaijan while living in Georgia, was abducted and brought to Azerbaijan and prosecuted for illegal border crossing, currency smuggling and violence against an official. PACE subsequently considered the weakness of the evidence and the surrounding circumstances sufficient to raise a presumption that his imprisonment was political.¹⁰
25. The Ganja events of July 2018 constituted the next major stage. After Yunis Safarov shot Ganja Executive Authority head Elmar Valiyev on 3 July 2018, and after a subsequent gathering in Ganja on 10 July ended in violence and the deaths of two police officers, the authorities constructed a much broader security narrative around the events. A special investigative group involving the Ministry of Internal Affairs, the State Security Service and the Prosecutor General's Office identified 29 persons as alleged militant co-conspirators in Safarov's attack, while another group of dozens of people detained in connection with the 10 July events was characterized as part of a radical religious and criminal conspiracy against the State. In total, scores of people were prosecuted and many more were detained.¹¹
26. The significance of the Ganja prosecutions lies not only in their scale but also in the manner in which criminal responsibility was expanded outward from the persons who had actually committed violent acts. Independent investigators documented detainees who had not participated in the 10 July gathering, allegations of detention without access to lawyers, torture and other ill-treatment, and claims that detainees were forced to sign pre-written confessions. The international fact-finding report on the Ganja cases concluded that there was reasonable basis to believe that detainees had been physically abused in order to obtain false self-incriminating statements and considered the vast majority, if not all, of those arrested in relation to the events to have been arbitrarily detained. A subsequent PACE report similarly noted serious problems concerning the sufficiency and credibility of prosecution evidence and concluded that many of those prosecuted following the Ganja events could be presumed to be political prisoners.¹²

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27. Aga Sarkhani's prosecution belongs specifically to this stage of the repression. Unlike prominent opposition politicians, human-rights defenders or religious leaders targeted in earlier cases, Sarkhani was not a public political actor. He became implicated principally through his previous acquaintance and communications with Yunis Safarov. The prosecution nevertheless incorporated him into an extensive alleged organized terrorist conspiracy extending over many years and killed him during the police operation. The Ganja case therefore demonstrates an important expansion of the repressive model: severe political and national-security prosecutions were no longer confined to publicly active critics or organized movements, but could encompass ordinary citizens whose personal relationships or communications allowed them to be incorporated into a broader state narrative of conspiracy.
28. The following years demonstrate further continuity. In October 2019, police violently dispersed peaceful opposition and civic demonstrations in central Baku, detained dozens of participants and subjected opposition activists to administrative imprisonment. Human Rights Watch reported that at least 35 senior Popular Front Party figures received sentences of up to 60 days on spurious charges. The use of short-term administrative detention operated alongside criminal prosecution as a mechanism for preventing and punishing collective political activity.¹³
29. In 2020, the same machinery was intensified during the Covid-19 pandemic and following the July pro-army demonstration in Baku. President Ilham Aliyev publicly characterized the opposition as a "fifth column", and numerous opposition figures were subsequently detained. After a small number of participants in the 14 July rally entered the parliament building, the authorities presented the incident as an opposition-organized attempt to overthrow the government. Human Rights Watch documented the arrest of numerous Popular Front members, including people who had not entered parliament and, in some cases, had not attended the rally at all. Senior party figures were additionally accused of attempting to overthrow the government. The similarity to the Nardaran and Ganja model is important: an identifiable incident involving violence or disorder was used to construct a substantially wider political conspiracy and extend criminal responsibility to a broader circle of individuals.
30. 2021-2022 did not represent liberalization but further consolidation. Peaceful demonstrations continued to be dispersed and activists detained or ill-treated. At the same time, the authorities increasingly supplemented direct repression with legislation restricting the remaining institutional channels for independent public activity. The new Law on Media, drafted in late 2021 and signed in February 2022, introduced a substantially more controlled regulatory framework for journalists and media entities. The Venice Commission found numerous problems with the law, including restrictions on media activity, financing and registration and insufficient independence of the regulatory authority.¹⁴

31. During the same period, a further pattern emerged involving Azerbaijani political emigrants returned from Europe. Several activists deported from Germany after unsuccessful asylum applications were arrested after returning to Azerbaijan, frequently on serious narcotics charges. Human Rights Watch documented, among others, Punhan Karimli and Jafar Mirzayev, deported in November 2021 and arrested in January 2022, as well as Malik Rzayev and Mutallim Orujov. This demonstrated that physical departure from Azerbaijan did not necessarily end exposure to politically motivated prosecution and that drug charges remained a recurrent instrument against persons perceived as politically disloyal.¹⁵
32. By late 2022, the transition into the current phase was visible. Civic activist Bakhtiyar Hajiyeu was arrested in December 2022 after earlier intimidation and threats associated with his criticism of the authorities. His initial prosecution subsequently expanded into numerous financial and economic charges. In parallel, a new Law on Political Parties was adopted in December 2022 and entered into force in January 2023. The Venice Commission and OSCE/ODIHR concluded that regulation had become substantially stricter in key areas including party registration, state control, financing and dissolution, against the background of Azerbaijan's already extensive record of violations of freedom of association.¹⁶
33. The repression then intensified sharply in 2023. In June, police violently suppressed residents protesting the environmental consequences of mining in Soyudlu and subsequently restricted access to the village and obstructed journalists. In July, economist and opposition politician Gubad Ibadoglu was arrested. During the summer and autumn, labor organizers, government critics and other activists were subjected to criminal or administrative prosecution, including drug and violence-related accusations. These developments did not introduce a fundamentally new method; rather, they applied long-established methods of politically instrumental prosecution to the informal civic initiatives that had emerged after the destruction of much of the traditional NGO sector.¹⁷
34. From November 2023 onward, repression moved toward the systematic dismantling of the remaining independent media and informal civil-society networks. Journalists associated with Abzas Media were arrested, followed in 2024 by the raid on Toplum TV and arrests of journalists and civic activists associated with it. Human-rights defender and election monitor Anar Mammadli was again arrested in April 2024. Repression simultaneously expanded into academic research, peace advocacy and minority-related work, including the prosecutions of Igbal Abilov and Bahruz Samadov. Human Rights Watch described this period as an escalating crackdown involving politically motivated charges against journalists, activists, researchers and human-rights defenders, while noting that fear and arrests had driven increasing numbers of independent civil-society actors out of the country and forced some organizations and media initiatives to close.¹⁸

35. The progression from the NGO restrictions and prosecutions of 2013–2014, through Nardaran in 2015, Ganja in 2018, the suppression of opposition mobilization in 2019–2020, and the restrictive Media and Political Parties laws of 2021–2022, to the mass arrests beginning in late 2022 and 2023 should therefore be understood as cumulative rather than episodic. Each phase narrowed another sphere in which autonomous political or social activity could exist: first established NGOs and human-rights organizations; then independent religious mobilization; then informal networks and personal associations framed as security threats; then street opposition and protest; then independent media and formal political parties. The arrests beginning in 2023 represented the culmination of this process by targeting many of the remaining informal organizations, media outlets and grassroots initiatives that had survived or emerged after the 2014 crackdown.
36. The current repression is consequently not a new phenomenon detached from the Ganja case. It is the most intensive stage of a system that had been progressively constructed and tested over the preceding decade. Aga Sarkhani's prosecution is particularly relevant within this continuum because it illustrates how the authorities' use of collective-conspiracy narratives could reach beyond organized political actors and punish an ordinary citizen on the basis of association with a principal accused. By 2023–2025, the same logic of expansive criminalization had been extended across virtually every remaining independent sphere: media, NGOs, labor activism, political parties, academic research, minority advocacy and peace activism, resulting in the de facto near-closure of autonomous civic and political space inside Azerbaijan.

The manner in which the operation and subsequent trial were carried out:

37. The most fundamental feature of Sarkhani's case is that he was killed before he could be detained, questioned in court, confront witnesses or give his own account of the accusations. According to the judgment, officers of the Main Department for Combating Organized Crime located him at a house in Baku, on the evening of 24 July 2018. The official account alleges that Sarkhani fired three shots from a Makarov pistol at police officers and was killed when officers returned fire.
38. The operation cannot be assessed solely through that official narrative. The international investigation into the Ganja crackdown classified the coordinated security response as involving at least five extrajudicial killings and identified Sarkhani among the persons killed during law-enforcement operations. It emphasized that the State bears an obligation under Article 2 ECHR to demonstrate that lethal force was absolutely necessary and proportionate and to conduct an independent, effective, prompt and publicly accountable investigation whenever State agents cause a death.

39. Serious deficiencies in scrutiny of the killing persisted during the criminal proceedings. Sarkhani's family challenged the proposition that he had offered armed resistance. During the appeal proceedings, his lawyer stated that the defense had specifically requested that the operational officers who were present when Sarkhani was killed be summoned and questioned, because the alleged armed resistance had not been proved. The court rejected that request.¹⁹ This was not a peripheral evidentiary issue: the alleged armed resistance both justified the State's lethal use of force and formed the basis of an additional criminal accusation against Sarkhani.
40. The treatment of Sarkhani's family after his death further raises concerns about transparency. His wife stated that for approximately seven months the authorities did not return his body, despite repeated approaches to the police, prosecutors and other State institutions. She further alleged that officials asked her to sign a statement renouncing the body, which she refused to do. RFE/RL reported that it was unable at the time to obtain an official response to these allegations.²⁰ Such conduct is difficult to reconcile with the obligation to ensure effective family participation and public accountability following a death caused by State agents.
41. Sarkhani's death also placed the subsequent criminal proceedings in the same structurally problematic position as Anar Bağırov's case. The accused could not explain his religious activities, foreign travel, alleged conversations with Safarov, alleged role within the Muslim Unity Movement, or the circumstances in which police said they discovered weapons and killed him. Nevertheless, the prosecution continued for more than three years and culminated in a formal judicial declaration of guilt.
42. On 16 August 2021, the Baku Assize Court found Sarkhani guilty of attempted aggravated murder, terrorism, organized weapons possession, attacks against a State or public figure, forcible alteration of the constitutional order, participation in an unlawful armed formation and violent resistance to State officials. The court expressly held that, although Sarkhani had died on 24 July 2018, his guilt had been "fully proved" and therefore issued a finding of guilt without imposing punishment.
43. His legal successor did not accept termination of the case merely because Sarkhani was dead. His wife maintained that he was innocent and sought acquittal on exonerating grounds. Her lawyer additionally sought examination of the officers involved in the fatal operation precisely in order to challenge the allegation of armed resistance. The court refused that evidentiary request, and the first instance finding of guilt remained in place.

The authorities' conduct:

44. The authorities' conduct suggests that Sarkhani's inclusion in the case served an important political and narrative function. The State did not merely investigate whether he had committed a discrete weapons offence or provided particular assistance to Safarov. It portrayed him as a central figure in an organized religious-extremist project whose objectives encompassed terrorism, assassination of officials and the destruction of Azerbaijan's secular constitutional system.
45. This portrayal was publicly established with exceptional speed. Human-rights investigators recorded that, in the immediate aftermath of the Ganja attack, the authorities connected Safarov to a previously targeted Islamist organization and characterized the events as an attempt to establish an Islamic State. After Sarkhani was killed, the authorities publicly described him as the mastermind of Safarov's attack. His membership in the Muslim Unity Movement made his inclusion particularly useful in substantiating the authorities' claim that the shooting represented organized religious extremism rather than an individual attack arising from grievances against Elmar Valiyev.
46. The political character of Sarkhani's persecution therefore does not depend on showing that he was himself a prominent opposition politician. Rather, his case demonstrates the politicization and securitization of religious affiliation: a person already known to the authorities because of his religious activity and connected to a movement previously prosecuted as extremist was incorporated into a new terrorism case and presented as one of its organizers.
47. That conclusion is strengthened by the fact that Sarkhani was outside Azerbaijan on the day of Safarov's attack. The prosecution was therefore necessarily dependent on a theory of prior planning and common purpose rather than physical participation in the shooting. Yet the State killed the person accused of that prior planning before he could answer the allegation and thereafter maintained the same conspiracy narrative through a posthumous trial.

Additional considerations:

48. The operation to apprehend Sarkhani and the subsequent criminal proceedings should therefore be considered together rather than as unrelated events. The same State apparatus first identified him as a major participant in an alleged Islamist conspiracy, then killed him during a disputed arrest operation, relied on its own account of armed resistance to justify that killing, and subsequently obtained a judicial finding that he was guilty of the alleged conspiracy. The international investigation's finding that the Ganja crackdown involved extrajudicial killings and serious Article 2 concerns materially reinforces the need for independent scrutiny of this entire sequence.

49. The extraordinary treatment of his remains and the rejection of the family's request to question the officers present during the killing further undermine the appearance of an investigation genuinely directed toward establishing the truth. His legal successor sought not merely closure but exoneration, yet the courts preserved a finding of guilt after a proceeding in which Sarkhani himself had never had any opportunity to defend himself.

CONCLUSION

50. The cumulative circumstances provide substantial grounds to regard the persecution and posthumous prosecution of Aga Sarkhani as politically motivated. He was a practicing Muslim and member of the Muslim Unity Movement, an organization whose members had already been subjected to the Nardaran crackdown. His family described repeated prior police attention connected to his religious activity. Following Safarov's attack, the authorities rapidly portrayed Sarkhani as one of the principal organizers of an Islamist conspiracy, even though border records establish that he was outside Azerbaijan when the 3 July shooting occurred.

51. The authorities then killed Sarkhani during a disputed operation to apprehend him. The official allegation that he opened fire was not subjected to the level of independent and adversarial scrutiny warranted by Article 2: the defense request to question the officers present was rejected, while international investigators independently identified serious concerns regarding deaths in law-enforcement operations during the Ganja crackdown. His family was additionally denied his body for months and sought unsuccessfully to obtain fuller information about the circumstances of his death.

52. Despite his death, the authorities continued the prosecution and ultimately obtained a formal finding that he had participated in the organized terrorist and anti-State conspiracy. In these circumstances, the posthumous proceedings appear to have served a politically instrumental declaratory function: to validate the authorities' broader account that the Ganja attack resulted from an organized Islamist network connected to previously targeted religious activism. Sarkhani's death means that his case does not technically fall within the current definition of a political prisoner under Resolution 1900, but both the operation leading to his death and the criminal proceedings that followed should be regarded as part of the politically motivated repression surrounding the Ganja case.

RECOMMENDATION

53. Aga Sarkhani's posthumous conviction should be subjected to a genuinely independent judicial review, with his legal successor afforded full access to the evidence and an effective opportunity to challenge the prosecution case. Unless his individual knowledge, intent and participation in the alleged terrorist conspiracy can be established through reliable evidence capable of independent scrutiny, the conviction should be quashed and Sarkhani fully rehabilitated.
54. Azerbaijan should additionally conduct an independent, effective and transparent investigation compliant with Article 2 ECHR into the operation in which Sarkhani was killed, including examination of whether he actually offered armed resistance, whether the use of lethal force was strictly necessary and proportionate, and whether the evidence relied upon to justify the operation was complete and reliable. The officers and other witnesses present during the operation should be subject to effective examination, and Sarkhani's family should receive appropriate compensation and other measures of restitutio in integrum for any violations established.

- ¹ International Partnership for Human Rights et al., Azerbaijani Government Crackdown in Ganja (2020),
- ² RFE/RL, ‘Gəncə hadisələrinə görə öldürülən şəxsin meyiti 7 aydır ailəsinə verilmir’ (7 February 2019).
- ³ *ibid* (n. 2)
- ⁴ IPHR, Global Diligence, Truth Hounds and Human Rights Club, Azerbaijani Government Crackdown in Ganja (January 2020), findings concerning killings and Article 2.
- ⁵ Parliamentary Assembly of the Council of Europe, Reported cases of political prisoners in Azerbaijan, Doc. 15020 (2020), especially paras. 27–29. The report relies on European Court of Human Rights judgments identifying retaliatory prosecutions, misuse of criminal law and systemic failures of judicial protection.
- ⁶ Human Rights Watch, Harassed, Imprisoned, Exiled: Azerbaijan’s Continuing Crackdown on Government Critics, Lawyers, and Civil Society (20 October 2016); Human Rights Watch, World Report 2015: Azerbaijan.
- ⁷ Venice Commission, Opinion on the Law on Non-Governmental Organizations (Public Associations and Funds) as Amended of the Republic of Azerbaijan, CDL-AD(2014)043, 15 December 2014.
- ⁸ Human Rights Watch, Harassed, Imprisoned, Exiled (2016).
- ⁹ Amnesty International, Azerbaijan: Torture and Travesty of Justice in Nardaran Case (6 February 2017); Parliamentary Assembly of the Council of Europe, Reported cases of political prisoners in Azerbaijan, paras. 57 et seq.
- ¹⁰ *ibid* (n. 10); *ibid* (n.11) para. 58.
- ¹¹ *ibid* (n.2).
- ¹² *ibid* (n.2); *ibid* (n.11), discussion of the Ganja cases.
- ¹³ Human Rights Watch, World Report 2023: Azerbaijan.
- ¹⁴ Venice Commission and Directorate General of Human Rights and Rule of Law, Joint Opinion on the Law on Media of Azerbaijan, CDL-AD(2022)009, adopted 17–18 June 2022.
- ¹⁵ *ibid* (n.15).
- ¹⁶ Human Rights Watch and Freedom Now, “We Try to Stay Invisible”: Azerbaijan’s Escalating Crackdown on Critics and Civil Society (8 October 2024); Venice Commission and OSCE/ODIHR, Joint Opinion on the Law on Political Parties of Azerbaijan, CDL-AD(2023)007
- ¹⁷ *ibid* (n.18).
- ¹⁸ *ibid* (n. 18)
- ¹⁹ *ibid* (n. 2)
- ²⁰ *ibid* (n. 2)

