

HAMZA MAMMADLI



FACTS

Personal data:

1. Hamza Mammadli (DOB: 1991) is an Azerbaijani-born German citizen. He moved to Germany in 2015, studied medicine, and worked as a physician assistant. He acquired German citizenship in early 2023 and had no previous convictions. On 1 June 2023, he returned to Azerbaijan to attend his wedding, scheduled for 8 June, and was detained by the State Security Service at Baku airport.
2. The authorities linked Mammadli's prosecution to online posts concerning the July 2018 Ganja events, although he was not accused of participating in the attack, the subsequent unrest, or Safarov's alleged organised group. On 7 January 2025, the Baku Assize Court convicted him of public calls for terrorism and public calls directed against the State and sentenced him to six years' imprisonment. Mammadli denied owning the pseudonymous accounts from which the principal posts had allegedly been published, denied knowing Yunis Safarov, and alleged that investigators pressured him to accept responsibility in exchange for a shorter sentence. His defence maintained that the prosecution had failed to provide reliable evidence linking him to the disputed accounts. Hamza Mammadli is regarded as a political prisoner.

Date of detention:

3. On 01.06.2023, Hamza Mammadli was detained by officers of the State Security Service at Heydar Aliyev International Airport upon arriving in Azerbaijan from Germany to attend his wedding. The criminal case against him had been initiated in July 2018, when he was living in Germany, and a detention order had been issued in his absence. He remained in custody throughout the investigation and trial proceedings, which culminated in the judgment of the Baku Assize Court of 07.01.2025 sentencing him to six years' imprisonment.

Legal accusations:

4. Hamza Mammadli was prosecuted in a separate criminal case initiated in connection with online publications concerning Yunis Safarov's attack on the then Head of the Ganja City Executive Authority, Elmar Valiyev, and the subsequent Ganja events. According to the indictment, Mammadli was formally charged under the following provisions of the Criminal Code of the Republic of Azerbaijan:
- public calls for terrorism, including public calls for the commission of terrorist offences or the dissemination of materials containing such calls (Article 214-2); and
 - repeated public calls directed against the State, or such calls made by a group of persons, including calls for the forcible seizure or retention of power or the forcible alteration of the constitutional order (Article 281.2).
5. The prosecution alleged that, while living in Germany, Mammadli acted together with certain members of an organisation described as the "Council of National Unity of European Azerbaijanis" and used or administered several Facebook and Instagram accounts, including the pseudonymous Facebook accounts "Kamil Axundov", "Gulu Quliyeva" and "Rüfət Aliyev". Authorities attributed to these accounts posts published between 2016 and 2020, including material concerning Safarov and the Ganja events that allegedly called on people to participate in violent protests, attack police officers and police stations, and forcibly seize State power. Unlike Azizov and the defendants in the principal Ganja trial, Mammadli was not accused of participating in Safarov's attack, possessing weapons, joining an armed group or taking part in the alleged organised conspiracy.
6. Mammadli categorically rejected the prosecution's account at trial. He pleaded not guilty, denied owning or controlling the principal pseudonymous accounts, and maintained that he did not know Safarov and had never communicated with him or made calls supporting his actions. He alleged that investigators pressured him to accept responsibility in exchange for a shorter sentence and that incriminating pre-trial statements had not been given voluntarily. His defence argued that the prosecution had failed to produce reliable evidence establishing that he had controlled the disputed accounts or authored the posts attributed to them.

Legal status of prisoner:

7. Hamza Mammadli is a convicted prisoner serving a six-year term of imprisonment, in a general-regime penitentiary institution. Azerbaijani human-rights defenders regard Mammadli as a political prisoner prosecuted in connection with the Ganja events and for alleged critical online expression.¹

Legal proceedings:

8. On 11 July 2018, the State Security Service initiated a criminal investigation concerning publications attributed to the Facebook account “Kamil Axundov” following Yunis Safarov’s attack on the then Head of the Ganja City Executive Authority, Elmar Valiyev. On 18 July 2018, Hamza Mammadli was formally accused under Articles 214-2 and 281.2 of the Criminal Code, a detention order was issued in his absence, and he was declared wanted. Mammadli was living in Germany at the time. The proceedings were subsequently suspended because he was outside Azerbaijan.
9. On 1 June 2023, Mammadli returned to Azerbaijan from Germany to attend his wedding and was detained by State Security Service officers at Heydar Aliyev International Airport. The suspended proceedings were then resumed, and the Sabail District Court ordered his placement in pre-trial detention. The initial detention period was subsequently extended several times, and Mammadli remained in custody throughout the investigation and trial.
10. The authorities linked Mammadli’s prosecution to the wider Ganja cases but did not accuse him of participating in Safarov’s attack, the violence of 10 July 2018, or the alleged organised armed conspiracy prosecuted in the principal Ganja trial. Instead, the prosecution alleged that, while living in Germany, he had acted together with members of an organisation described as the “Council of National Unity of European Azerbaijanis” and administered several pseudonymous Facebook accounts. According to the prosecution, these accounts published material supporting Safarov and calling on people to participate in violent protests, attack police officers and police stations, and forcibly seize State power.
11. Mammadli pleaded not guilty and denied knowing or communicating with Safarov. He acknowledged using his personal “Hamza” Facebook profile and several Instagram accounts but denied creating or controlling the pseudonymous Facebook accounts “Kamil Axundov”, “Gulu Quliyeva” and “Rüfət Aliyev”, from which the principal Ganja-related posts had allegedly been published. He testified that investigators repeatedly pressured him to accept responsibility, promising that he would receive a short sentence if he confessed. He further stated that the investigator drafted incriminating statements on his behalf and disregarded his requests for legal assistance and his right to remain silent.

12. The prosecution relied on State Security Service reports asserting that the disputed accounts had been accessed through IP addresses located in Kaiserslautern, where Mammadli lived, and that the “Kamil Axundov” account belonged to him. It also relied on forensic examinations of his mobile telephone, linguistic assessments of the publications, statements from social-media users, and purportedly voluntary admissions that Mammadli subsequently repudiated. The defence argued that this evidence did not establish that Mammadli had created or controlled the disputed accounts. Numerous witnesses stated that they did not know him, while the forensic examination of the telephone did not demonstrate that it had been used to operate the disputed Facebook accounts in 2018.
13. During the trial, Mammadli’s lawyers argued that the accusations rested on assumptions and that no reliable evidence connected him to the principal publications. They sought his acquittal. In his final statement, Mammadli reiterated that he had not committed any crime, did not know Safarov and had never made calls supporting Safarov or the Ganja events. The prosecution requested a sentence of eight years’ imprisonment.
14. On 7 January 2025, the Baku Assize Court found Mammadli guilty of public calls for terrorism under Article 214-2 and repeated or group-based public calls directed against the State under Article 281.2. The court sentenced him to three years’ imprisonment under Article 214-2 and five years and six months under Article 281.2. By partially combining the sentences under Article 66.3, the court imposed a final sentence of six years’ imprisonment in a general-regime penitentiary institution, calculated from 2 June 2023.

LEGAL ANALYSIS

Reasons why Hamza Mammadli should be regarded as a political prisoner:

15. Assessment of whether H. Mammadli should be regarded as a political prisoner is based on the Resolution 1900 (2012) ‘The Definition of Political Prisoner’ of the Parliamentary Assembly of the Council of Europe and the criteria established in the Resolution (paragraph 3).² The legal proceedings against and conviction of H. Mammadli satisfy two criteria established by the paragraph. 3 of the Resolution for defining political prisoners ((a) and (e)):
- (a) Hamza’s detention and imprisonment violate his fundamental rights under the European Convention on Human Rights, particularly freedom of expression and the right to freedom of association; as well as the right to a fair trial and to liberty and security.
 - (e) The political motives (ulterior motives) were sole and predominant in pursuing and conducting unfair criminal proceedings against him, which caused preliminary detention and imprisonment.

16. The European Court of Human Rights' jurisprudence on Article 18 of the ECHR, which prohibits restrictions on rights for improper purposes, reinforces this analysis. The following considerations based on quadripartite test should be emphasised in this totality assessment in the general contextual evaluation of a distinct state of affairs (*mutatis mutandis*, *Ibrahimov and Mammadov v. Azerbaijan*, 2020, §§ 113-131):

- 1) The prisoner's public profile;
- 2) The sequence of the events;
- 3) The manner in which the investigations and trial were carried out;
- 4) The authorities' conduct.

Mahir Azizov's public profile:

17. Mammadli's case illustrates the politically instrumental prosecution of an ordinary citizen who had no prominent public or organisational role. He had lived in Germany since 2015, worked in healthcare and, according to his family and defence, had not participated in political organisations or demonstrations. Unlike the defendants in the principal Ganja trial, he was not accused of involvement in Safarov's attack, the subsequent violence, or an armed conspiracy. Instead, the authorities incorporated him into the broader official narrative of the Ganja events by attributing several pseudonymous social-media accounts and allegedly violent publications to him. His six-year sentence therefore served a broader deterrent function, demonstrating that even citizens living abroad could face severe punishment for critical online expression or for disputed posts connected to politically sensitive events.

The sequence of events:

18. Hamza Mammadli'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 organised-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.³

19. 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 organisations 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.⁴ 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 criticised these restrictions, including excessive state supervision and interference with NGO autonomy.⁵
20. 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 organisations could not resume their previous activities. Human Rights Watch documented that some activists left Azerbaijan altogether, while organisations 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 formalised, institutionally funded human-rights and NGO sector had been dismantled or forced into inactivity.⁶
21. 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 individualised evidence against defendants.⁷
22. 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.⁸

23. 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 characterised as part of a radical religious and criminal conspiracy against the State. In total, scores of people were prosecuted and many more were detained.⁹
24. 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.¹⁰
25. Hamza Mamadli's prosecution belongs specifically to this stage of the repression. Unlike prominent opposition politicians, human-rights defenders or religious leaders targeted in earlier cases, Mammadli was not a public political actor. Nor was he accused of participating in Safarov's attack or belonging to the alleged organised group prosecuted in the principal Ganja case. Instead, he became implicated through the authorities' disputed attribution to him of several pseudonymous social-media accounts from which posts concerning Safarov and the Ganja events had allegedly been published. The prosecution nevertheless classified this alleged online activity as public calls for terrorism and the forcible seizure of State power and ultimately secured a six-year sentence. Mammadli's case therefore demonstrates a further expansion of the repressive model: political and national-security prosecutions were extended beyond alleged participants and associates to ordinary citizens living abroad whose critical or purported online expression could be incorporated into the broader State narrative surrounding the Ganja events.
26. 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.¹¹

27. 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 characterised 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-organised 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.
28. 2021-2022 did not represent liberalisation 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.¹²
29. 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.¹³
30. By late 2022, the transition into the current phase was visible. Civic activist Bakhtiyar Hajiyev 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.¹⁴

31. 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, labour organisers, 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.¹⁵
32. 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 Iqbal 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 organisations and media initiatives to close.¹⁶
33. The progression from the NGO restrictions and prosecutions of 2013–2014, through Nardaran in 2015, Ganja in 2018, the suppression of opposition mobilisation 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 organisations; then independent religious mobilisation; 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 organisations, media outlets and grassroots initiatives that had survived or emerged after the 2014 crackdown.

34. The current repression is consequently not a new phenomenon detached from the Ganja case. It represents the most intensive stage of a system progressively constructed and tested over the preceding decade. Hamza Mammadli's prosecution is particularly relevant within this continuum because it demonstrates how the authorities extended the Ganja security narrative beyond alleged participants and associates to an ordinary citizen living abroad. Although Mammadli was not accused of involvement in Safarov's attack or membership in the alleged organised group, disputed social-media accounts and publications attributed to him were used to prosecute him for terrorism-related and anti-State offences and sentence him to six years' imprisonment. By 2023–2025, the same logic of expansive criminalisation had been extended across virtually every remaining independent sphere: media, NGOs, labour 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.¹⁷

The manner in which the investigations and trial were carried out:

35. The investigation against Hamza Mammadli was accompanied by allegations of coercion and violations of his defence rights. Mammadli testified that State Security Service officials repeatedly pressured him to accept the accusations, promising that he would receive a short sentence if he confessed. He stated that he invoked his right to remain silent and requested a lawyer, but that the investigator prepared statements and even procedural applications in his name. He subsequently repudiated the incriminating pre-trial statements, maintaining that they had not been given voluntarily.
36. These allegations directly affected the reliability of evidence central to the prosecution. The court relied on purported admissions in which Mammadli allegedly accepted that he had created several pseudonymous accounts and published calls connected with the Ganja events. At trial, however, he denied owning the disputed accounts and explained the circumstances in which the statements had been obtained. The court dismissed his testimony as an insincere attempt to avoid responsibility without adequately examining whether the admissions were voluntary or obtained with effective legal assistance.
37. The prosecution's technical evidence did not conclusively establish that Mammadli controlled the disputed accounts. State Security Service reports stated that the accounts had been accessed through IP addresses located in Kaiserslautern and subsequently asserted that the "Kamil Axundov" account belonged to him. The judgment did not identify direct information from Facebook authenticating Mammadli as the account's owner or explain the technical basis for excluding other users. The forensic examination of his telephone identified his recognised social-media profiles but did not establish that the device had been used to operate the disputed Facebook accounts in 2018.

38. The proceedings also failed to distinguish between different categories of expression attributed to Mammadli, including criticism of public officials, support for demonstrations, statements defending Safarov and explicit alleged calls for violence. Although Mammadli was not accused of participating in Safarov's attack or the subsequent Ganja violence, these publications were treated collectively as evidence of terrorism and attempts to seize State power. On 7 January 2025, the court accepted the prosecution's account and sentenced him to six years' imprisonment.

The authorities' conduct:

39. The authorities' conduct toward Mammadli must be assessed within the broader response to the Ganja events, in which Safarov's attack, the subsequent unrest and related online activity were presented as manifestations of a wider terrorist and anti-State mobilisation. Mammadli's case extended this narrative to an ordinary citizen who had lived abroad for several years and was neither accused of participating in the violence nor shown to have had any relationship with Safarov. Instead of independently establishing his authorship of the disputed posts, the authorities relied on contested account attribution, inconclusive technical evidence and admissions allegedly obtained through pressure. Taken together, these circumstances indicate that the proceedings were directed not only at determining responsibility for particular publications, but also at incorporating Mammadli into the State's pre-existing political and security narrative surrounding the Ganja events.

Additional considerations:

40. Finally, international human rights observers and international organisations have denounced the charges against Hamza Mammadli as politically motivated.

CONCLUSION

41. The personal factors (Hamza Mammadli's public profile, absence of convincing evidence, and constant violation of procedural rights) and contextual factors (politically repressive environment) cumulatively indicate reasonable grounds to believe that Hamza Mammadli should be considered a remand political prisoner in light of Resolution 1900 (2012) of the Parliamentary Assembly of the Council of Europe (PACE).

RECOMMENDATION

42. Based on this conclusion, Hamza Mammadli should be released unconditionally and immediately. Furthermore, he should be compensated restitutio in integrum.

¹ Union for the Freedom of Political Prisoners of Azerbaijan, List of Political Prisoners: 12 February 2025 (12 February 2025) 206–07 <https://www.ipd-az.org/wp-content/uploads/2025/02/12feb2025ENG.pdf> accessed 9 September 2026.

² Parliamentary Assembly of the Council of Europe (PACE), ‘Resolution 1900 (2012): The definition of political prisoner’ (3 October 2012) <https://assembly.coe.int/nw/xml/XRef/Xref-XML2HTML-en.asp?fileid=19150> accessed 29 May 2025.

³ 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.

⁴ 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.

⁵ Venice Commission, Opinion on the Law on Non-Governmental Organisations (Public Associations and Funds) as Amended of the Republic of Azerbaijan, CDL-AD(2014)043, 15 December 2014.

⁶ Human Rights Watch, Harassed, Imprisoned, Exiled (2016).

⁷ 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.

⁸ *ibid* (n. 10); *ibid* (n.11) para. 58.

⁹ *ibid* (n.2).

¹⁰ *ibid* (n.2); *ibid* (n.11), discussion of the Ganja cases.

¹¹ Human Rights Watch, World Report 2023: Azerbaijan.

¹² 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.

¹³ *ibid* (n.15).

¹⁴ 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.

¹⁵ *ibid* (n.18).

¹⁶ *ibid* (n.18).

¹⁷ Parliamentary Assembly of the Council of Europe, Reported cases of political prisoners in Azerbaijan (2020); *ibid* (n.18).

