

ZABIL GAHRAMANOV



FACTS

Personal data:

1. Zabil Gahramanov (DOB: 01 July 1974) is an Azerbaijani citizen, lawyer, and human rights defender from Kalbajar, a member of the Azerbaijan Bar Association and a lawyer of the Ganja Regional Legal Office. Before his arrest, he was known for acting in politically sensitive and high-profile cases, including the defense of Ilkin Suleymanov and Polad Ismayilov, representation of victims in the “Tartar” cases, and defense of AXCP/PFPA members Sahib Mammadzadeh and Shahin Hajiyev and other political activists. He is also known for defending persons detained on political grounds and for publicly denouncing police violence and abuses in Ganja.
2. He was detained on 23 October 2025. The prosecution was initially opened under Article 221.2.2 of the Criminal Code; on 25 October 2025 he was formally charged under Articles 178.2.4 and 221.2.2 and remanded in custody until 23 January 2026. On 15 January 2026, the accusations were broadened to Articles 178.2.2, 178.2.3, 178.2.4 and 221.2.2, and his pre-trial detention was then extended first to 23 March 2026 and later to 23 May 2026.¹
3. The available materials support the conclusion that the proceedings against Zabil Gahramanov were instituted on improper grounds and formed part of a retaliatory misuse of the criminal law rather, particularly when the sequence of events is considered in its entirety. On 8 October 2025, his license to practice law was suspended following a complaint by the Ministry of Internal Affairs in the context of his public criticism of police misconduct and rights violations, and his subsequent arrest and prosecution followed in circumstances that cannot plausibly be dissociated from that background. His case is linked to his professional activities as a lawyer in politically sensitive matters, including the representation of political activists, alleged victims of state abuse, and other persons involved in cases engaging clear public-interest concerns. Taken together, these circumstances provide strong grounds for concluding that the criminal proceedings were used as a measure of reprisal for his legal work and public advocacy.

4. The allegations against Z. Gahramanov lack credibility and are widely regarded as politically driven and part of a wider crackdown on civil society and independent media launched by the Azerbaijani authorities starting from 2022.²

Date of detention:

5. On 23 October 2025, Zabil Gahramanov was detained as a suspect by officers of the Ganja City Main Police Department in connection with an alleged hooliganism incident, and on 25 October 2025 the Ganja City Court imposed a pre-trial detention measure for three months, calculating the detention period from 23 October 2025.

Legal accusations:

6. On 25 October 2025, following his detention two days earlier, the investigating authorities formally charged Zabil Gahramanov with the following fabricated accusations:

- hooliganism, namely alleged gross violation of public order accompanied by resistance to a person preventing the breach of public order, under Article 221.2.2 of the Criminal Code;
- fraud causing significant damage, under Article 178.2.4 of the Criminal Code.

7. The prosecution was then broadened on 15 January 2026, when the authorities reclassified the case and added Articles 178.2.2, 178.2.3 and 178.2.4 of the Criminal Code (fraud, in case of repeated commission; fraud, committed by a person using his/her official position; and fraud, when committed with significant damage), while maintaining Article 221.2.2 of the Criminal Code, thereby transforming an already abusive prosecution into a wider fabricated case based on repeated-fraud.

Legal status of prisoner:

8. Zabil Gahramanov is a pre-trial detainee, not a convicted prisoner. The initial detention order of 25 October 2025 was upheld on appeal on 28 October 2025; his detention was subsequently extended on 17 January 2026 until 23 March 2026 and then extended again in March 2026 until 23 May 2026. In the absence of the trial judgment convicting him, he therefore remains in custody as a remand prisoner in the course of a pending fabricated prosecution.

Legal proceedings:

9. On 23 October 2025, Zabil Gahramanov was detained by law-enforcement authorities as a suspect, and on 25 October 2025 the Ganja City Court, sitting in closed session, ordered his pre-trial detention for three months, calculating the custodial period from 23 October 2025 until 23 January 2026; he remained in custody thereafter, and the defense appeal against that remand order was dismissed by the Ganja Court of Appeal on 28 October 2025, leaving the detention measure unchanged.

10. The procedural course disclosed by the materials indicates not a bona fide criminal investigation but a constructed and progressively broadened case. A file initially opened on 23 October 2025 under Article 221.2.2 was reclassified on 25 October 2025 to include Article 178.2.4, and by January 2026, the prosecution had expanded the accusations further to Articles 178.2.2, 178.2.3, 178.2.4 and 221.2.2, while simultaneously centralizing the investigation in the MIA's main investigative structure. The pattern is characteristic of a fabricated prosecution whose scope is adjusted as necessary to preserve custody and increase pressure, rather than of an investigation following a stable and credible evidentiary basis.
11. The detention decisions reflected in the court file were anchored almost entirely in investigator-led applications, complainant allegations, a forensic finding of minor injury, and generic assertions of absconding, obstruction and unlawful influence, all of which the courts accepted at face value without subjecting the prosecution narrative to the exacting scrutiny required where a lawyer known for politically sensitive defense work is deprived of liberty. Rather than identifying concrete, individualized facts capable of showing why continued detention was strictly necessary, the courts relied on formulaic reasoning that the original grounds had not fallen away, that lighter measures would be inadequate, and that the supposed complexity and volume of the case justified continued custody.
12. At the remand hearings, Gahramanov denied guilt and opposed the prosecution's requests, while the defense argued that there were no material or procedural grounds for continued detention and sought replacement of custody with a non-custodial preventive measure; public reporting further records the defense position that no reliable primary evidence of guilt had been presented and that there was no factual basis to suppose that he would abscond or interfere with the proceedings. Those objections were not meaningfully addressed. Instead, the courts endorsed the prosecution's account in closed proceedings and allowed the fabricated case to advance through repeated extensions of pre-trial detention.

B. LEGAL ANALYSIS

Reasons why Zabil Gahramanov should be regarded as a political prisoner:

13. Assessment of whether Z. Gahramanov 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)³. The legal proceedings against and conviction of Z. Gahramanov satisfy two criteria established by the paragraph. 3 of the Resolution for defining political prisoners ((a) and (e)):

(a) Zabil'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.

14. 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 emphasized 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.

Zabil Gahramanov's public profile:

15. Zabil Gahramanov is a lawyer and human rights defender with a recognized public profile in politically sensitive and public-interest litigation. The court materials themselves identify him as a member of the Azerbaijan Bar Association and a lawyer of the Ganja Regional Legal Office, and further record that his right to practice law was suspended for six months by a decision of the Bar Association's Praesidium dated 8 October 2025. Public reporting and international professional protection mechanisms likewise describe him as well known for defending persons detained on political grounds and for publicly denouncing police violence. His name is linked to the defense of Ilkin Suleymanov, Polad Ismayilov, victims in the "Tartar" cases, AXCP/PFPA figures Sahib Mammadzade and Shahin Hajiyev, and other activists. On any fair reading, this professional activity gave him a clear and visible public profile as a lawyer engaged in cases touching directly on police abuse, politically motivated prosecution and other matters of acute public concern.

16. Against that background, the proceedings brought against him bear the hallmarks of reprisal, not legitimate criminal enforcement. Public sources record that the complaint which preceded the suspension of his license was lodged by the Ministry of Internal Affairs after his public criticism of violations committed by the Ganja police. In these circumstances, the reasonable conclusion is that the fabricated case against Gahramanov served a punitive and deterrent purpose, namely, to silence a lawyer who had become publicly associated with challenging abusive policing and defending politically sensitive clients.

The sequence of events:

17. Zabil Gahramanov's arrest is part of a larger, coordinated pattern of repression in Azerbaijan, in which opposition-aligned individuals and government critics have been detained on a strikingly repetitive set of allegations, most commonly serious narcotics-related accusations framed as large quantity and/or intent to sell, as well as finance/tax related crimes and crimes against the state and national security. This uniformity, and the way charges and detention measures have been applied across multiple similar cases, strongly suggests a state-driven strategy to criminalize dissenting political affiliation and criticism rather than a legitimate process aimed at individual wrongdoing. The relevant sequence of events should therefore be assessed synthetically, as a single wave of repression with a clear policy logic and continuity.
18. Already in 2022, a discernible pattern of repression was emerging through a series of arrests that disproportionately affected persons deported/returned from abroad (notably Germany), individuals perceived as affiliated with the PFPA/AXCP, Musavat and certain minority figures. This early hunt functioned as a clear precursor to, and warning sign of, the wider crackdown that would later expand across independent media, NGOs, and other segments of civil society.
19. In December 2022, civic activist Bakhtiyar Hajiyev was arrested.⁴ In June 2023, protests against the gold mine in the village of Soyudlu, Gadabay, and their coverage by informally networked NGOs and critical media (including Toplum TV) accelerated the process of repression. After suppressing these protests, the government imposed a blockade on the village and blamed NGOs and the media for inciting the events.⁵
20. In July 2023, politician and economist Gubad Ibadoglu was detained.⁶ In August 2023, pro-government media organized a smear campaign against peace activists protesting military operations in Nagorno-Karabakh.⁷ In September 2023, four activists were administratively detained for one month. Around the same time, arrests were carried out against Labor Desk (İşçi Masası) activists, who sought to establish the country's only alternative trade union organization.⁸
21. The main follow-up campaign began in November 2023. First, the pro-government media published smear articles targeting almost all NGOs and media outlets. Later, at the end of November 2023, the AbzasMedia arrests began.⁹ These arrests continued in early March 2024 with a police raid against the detainee's affiliated organization and the arrest of several individuals represented in those institutions.

22. In April 2024, Imran Aliyev, the head of the Meclis.info portal monitoring the parliament, was detained.¹⁰ In May 2024, Anar Mammadli, the head of Election Monitoring and Democracy Studies (EMDS), was arrested (he had also been arrested in the previous round of repression)¹¹. These arrests demonstrate that a new wave of repression had already begun. The objective of this wave was to paralyze the activities of post-2014 informally networked NGOs and critical media. But it also expanded beyond NGOs and media into academia and peace advocacy: Iqbal Abilov¹², a Talysh historian/ethnographer, was detained in July 2024 and later sentenced to 18 years' imprisonment in May 2025 on treason-related accusations and political scientist Bahruz Samadov¹³ was detained in August 2024 on treason charges similarly and later sentenced to a 15 years' prison term. Both of their arrests are widely condemned as politically motivated.
23. Repression further continued against independent media through the Meydan TV case:¹⁴ Human Rights Watch reported that the investigation targeted the outlet and that its newsroom staff were held in pre-trial detention from December 2024, with subsequent arrests feeding into a consolidated trial that began in December 2025. Finally, repression widened to formal opposition politics in late 2025, when Ali Karimli¹⁵, the long-standing leader of the Popular Front Party, was detained (29 November 2025) and remanded into pre-trial custody, amid a broader escalation against the party documented by human rights monitors.
24. This process was preceded by restrictive legislation: the Law on Media (2021)¹⁶ and the Law on Political Parties (2022)¹⁷. Both laws were criticized by the Venice Commission of the Council of Europe for being restrictive. Nevertheless, they remain valid and enforceable. A similar process took place during the repression of 2013–2014: restrictive laws were first adopted, and arrests followed.
25. In this regard, the persons arrested in this process, including the detainee, are victims of the political repression of 2023–2025. The main objective of this campaign of political arrests is to dismantle the informal, networked NGOs and critical media that revived and assumed a new format in the post-2014 era. Political arrests in this context serve an instrumental purpose.

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

26. Although no trial on the merits has yet taken place, the manner in which the investigation has been conducted and judicially supervised already demonstrates that the case against Zabil Gahramanov was handled in bad faith and on the basis of a predetermined prosecutorial logic rather than a genuine search for truth. The file shows that the proceedings were opened on 23 October 2025 under Article 221.2.2 alone, then reclassified on 25 October 2025 to include Article 178.2.4, and later broadened again on 15 January 2026 to Articles 178.2.2, 178.2.3, 178.2.4 and 221.2.2, with the investigation simultaneously extended and the detention measure prolonged. That sequence, in which accusations were progressively accumulated while custody was preserved throughout, is characteristic of a constructed case being reinforced as it proceeds, not of a neutral investigation following a stable evidentiary basis.

27. According to the case narrative accepted by the courts, the proceedings were triggered by a complaint from Fazil Isgandarov, who alleged that Gahramanov had insulted and kicked him at a carwash, and the initial material relied on by the prosecution consisted of that complaint, a confrontation protocol dated 24 October 2025, and a forensic medical opinion of 25 October 2025 classifying the injuries as minor. Yet, before any serious and independently testable inquiry into that episode had been completed, the case was expanded to include a separate fraud allegation based on a different complainant and was then later widened still further. The abrupt shift from a local altercation file to a broader multi-count prosecution, particularly in a case against a lawyer already under pressure from the authorities, strongly suggests opportunistic charge-building rather than an investigation developing in the ordinary course. That impression is reinforced by public reporting that the defense raised territorial-jurisdiction objections from the outset and that external observers identified irregularities in the investigation and serious doubts as to the impartiality of the proceedings.
28. The subsequent investigative measures were dominated by the police and the prosecuting authorities and were insulated from meaningful adversarial scrutiny. The case was initiated and first handled by the Ganja City Main Police Department, then, on 7 November 2025, transferred by the Prosecutor General's Office to the Ministry of Internal Affairs' Main Investigation and Inquiry Department, Serious Crimes Investigation Division, where it was assigned to a special investigator and then to an investigators' group. Both the initial remand hearing and the later detention-extension proceedings were conducted in closed court sessions, while the courts repeatedly accepted the investigator's motion and the prosecutor's submission without subjecting the prosecution theory to rigorous scrutiny. By the time of the March 2026 extension, the authorities were still relying on the need to obtain and process expert reports ordered on 14 January, 9 February and 27 February 2026, to question further witnesses, and to obtain material from the Bar Association and the Ganja Regional Legal Office. In other words, detention was being used to compensate for the incompleteness of the investigation and to preserve prosecutorial control while the file was still being assembled.
29. The courts' reasoning, as reflected in the detention decisions, was markedly formalistic and prosecution-centric. In the initial remand order, the Ganja City Court relied on the asserted public danger of the alleged acts, the possibility of influencing victims, absconding, obstructing the investigation, hiding from the prosecuting authorities and reoffending, and on that basis concluded that detention was necessary until 23 January 2026. The later extension orders proceeded in the same manner, invoking the continued existence of reasonable suspicion and generic risks while treating those formulae as sufficient in themselves. That approach is particularly problematic because the file also records that Gahramanov denied guilt from the outset, including during questioning on 25 October 2025, and the defense continued to argue that there were neither material nor procedural grounds for detention. Public reporting further records the defense position that no reliable primary evidence of guilt had been presented. The courts nevertheless preferred the prosecution's version wholesale and did not engage in any genuinely exacting assessment of whether continued detention remained strictly necessary in the specific circumstances of the case.

30. The handling of the successive detention extensions reinforces the conclusion that the proceedings were being used to secure and maintain incarceration rather than to conduct an objectively balanced investigation. In January 2026, the Sabail District Court relied, among other things, on a witness statement alleging that, after his arrest, Gahramanov had telephoned from detention, together with a telegram from another individual alleging threats and a reference to yet further criminal-character complaints under examination, in order to conclude that he might unlawfully influence participants in the proceedings. In March 2026, while key expert reports were still outstanding and further investigative steps remained to be taken, the court again prolonged detention, notwithstanding the defense objection that there were no material or procedural grounds for doing so and the request to replace custody with a non-custodial preventive measure. The effect was that each investigative deficiency or newly asserted allegation became not a reason for greater judicial caution, but a reason to keep the accused lawyer in custody.

The authorities' conduct:

31. The conduct of the authorities, taken as a whole, confirms the retaliatory character of the case. Before his arrest, Gahramanov's license to practice law had already been suspended for six months on 8 October 2025, and public sources indicate that this followed a complaint by the Ministry of Internal Affairs prompted by his public criticism of abuses committed within the Ganja police. There are substantial grounds to conclude that the suspension of his license, the institution of criminal proceedings and his subsequent detention formed part of a retaliatory response to his legal and human rights work and to his public criticism of the authorities. The circumstances of the case have also given rise to serious concern as to the impartiality of the proceedings, the presence of procedural irregularities in the investigation, and the use of pro-government media coverage in a manner that stigmatized him and amplified the prosecution narrative from the outset. Public reporting also shows that, in parallel with the criminal prosecution, the investigator-imposed restrictions on his communication with family members and the Ganja City Court upheld those restrictions. In these circumstances, the authorities failed to investigate the case; they used disciplinary measures, detention restrictions, prosecutorial escalation, closed hearings and public stigmatization in a coordinated manner to punish and silence a lawyer whose professional work and public speech had become inconvenient to them.

Additional considerations:

32. Finally, international human rights observers have denounced the charges against Z. Gahramanov as politically motivated.¹⁸

CONCLUSION

33. The personal factors (Zabil Gahramanov's public profile, absence of convincing evidence, and constant violation of procedural rights) and contextual factors (new wave of political repression) cumulatively indicate reasonable grounds to believe that Zabil Gahramanov should be considered a political prisoner in light of Resolution 1900 (2012) of the Parliamentary Assembly of the Council of Europe (PACE).

RECOMMENDATION

34. Based on this conclusion, Zabil Gahramanov should be released unconditionally and immediately. Furthermore, he should be compensated *restitutio in integrum*.

- ¹ Abzas Media, ‘Vəkil Zabil Qəhrəmanovun saxlanıldığı bildirilir’ (24 October 2025) <https://abzas.org/en/2025/10/vkil-zabil-qhrmanovun-saxla671d07cc-c/> accessed 23 March 2026.
- ² European Parliament, ‘Resolution on the crackdown on independent media in Azerbaijan, notably the case of Abzas Media’ (2024) P9_TA(2024)0074 https://www.europarl.europa.eu/doceo/document/TA-10-2024-0074_EN.html accessed 29 May 2025.
- ³ 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.
- ⁴ Eurasianet, Prominent activist detained following U.S. sanctions on Azerbaijani official <https://eurasianet.org/prominent-activist-detained-following-us-sanctions-on-azerbaijani-official> accessed 28 August 2025
- ⁵ Reporters Without Borders, Police prevent coverage of protests about environmental scandal in Azerbaijan <https://rsf.org/en/police-prevent-coverage-protests-about-environmental-scandal-azerbaijan> accessed 28 August 2025
- ⁶ Human Rights Watch, Azerbaijan: Free Academic Facing Bogus Charges <https://www.hrw.org/news/2024/07/23/azerbaijan-free-academic-facing-bogus-charges> accessed 28 August 2025
- ⁷ Musavat, “No-Warçılarının dosyesi: onlar harada və necə yetişiblər” https://musavat.com/news/no-war-cilarin-dosyesi-onlar-harada-ve-necə-yetisibler_1001622.html accessed 28 August 2025
- ⁸ Eurasianet, Azerbaijan authorities smash unionization efforts for gig workers <https://eurasianet.org/azerbaijan-authorities-smash-unionization-efforts-for-gig-workers> accessed 28 August 2025
- ⁹ Amnesty International, Azerbaijan: Seven journalists sentenced in latest shocking crackdown on free speech <https://www.amnesty.org/en/latest/news/2025/06/azerbaijan-seven-journalists-sentenced-in-latest-shocking-crackdown-on-free-speech/> accessed 28 August 2025
- ¹⁰ Council of Europe, Safety Of Journalists — FOM Alert <https://fom.coe.int/en/alerte/detail/107640886> accessed 28 August 2025
- ¹¹ Council of Europe Commissioner for Human Rights, Azerbaijan: authorities should release imprisoned human rights defenders, journalists and civil society activists <https://www.coe.int/en/web/commissioner/-/azerbaijan-authorities-should-release-imprisoned-human-rights-defenders-journalists-and-civil-society-activists> accessed 28 August 2025
- ¹² Scholars at Risk, ‘Release academic Igbal Abilov, wrongfully imprisoned for one year’ (22 July 2025) <https://www.scholarsatrisk.org/2025/07/release-academic-igbal-abilov-wrongfully-imprisoned-for-one-year/> accessed 7 January 2026
- ¹³ Human Rights Watch, ‘Azerbaijan: Escalating Crackdown on Critics’ (30 August 2024) <https://www.hrw.org/news/2024/08/30/azerbaijan-escalating-crackdown-critics> accessed 7 January 2026.
- ¹⁴ Arzu Geybullayeva, ‘Another Courageous Journalist Jailed in Azerbaijan’ (Human Rights Watch, 16 May 2025) <https://www.hrw.org/news/2025/05/16/another-courageous-journalist-jailed-azerbaijan> accessed 7 January 2026.
- ¹⁵ Amnesty International, ‘Azerbaijan: Arrest of opposition leader is further evidence of consolidation of authoritarian practices’ (1 December 2025) <https://www.amnesty.org/en/latest/news/2025/12/azerbaijan-arrest-of-opposition-leader-is-further-evidence-of-consolidation-of-authoritarian-practices/> accessed 7 January 2026.

¹⁶ Venice Commission. 'Opinion on On 'The Law On Media in Azerbaijan.' Council of Europe, Opinion No. 1078/2022, 2022, available at [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2022\)009-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2022)009-e)

¹⁷ Venice Commission and OSCE/ODIHR. Joint Opinion On The Law On Political Parties, 2023 available at <https://www.osce.org/files/f/documents/1/4/543922.pdf>

¹⁸ International Observatory of Lawyers, Azerbaijan: Arrest and arbitrary detention of lawyer Zabil Gahramanov, 19 January 2026, available at <https://protect-lawyers.org/en/case/zabil-gahramanov/>

