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**STATUS OF HUMAN RIGHTS IN THE RUSSIAN FEDERATION  
FOR THE 44<sup>TH</sup> SESSION OF THE  
UNIVERSAL PERIODIC REVIEW**

*www.ECLJ.org*  
*4, quai Koch*  
*67000 Strasbourg, France*  
*Phone: +33 (0)3.88.24.94.40*

# **Status of Human Rights in Russia for the 44<sup>th</sup> Session of the Universal Periodic Review**

## **Introduction**

1. The European Centre for Law and Justice (ECLJ) is an international, non-governmental organization dedicated to promoting and protecting human rights around the world. The ECLJ also holds Special Consultative status before the United Nations Economic and Social Council. This report also discusses the status of human rights in the Russian Federation (Russia) for the 44<sup>th</sup> session of the Universal Periodic Review (UPR).

## **Background**

2. Russia is located in Eastern Europe and extends into North Asia and has a population of approximately 142 million people.<sup>1</sup> Approximately 15-20% are practicing Russian Orthodox, 10-15% are Muslim, and 2% are other Christians.<sup>2</sup>

3. Russia's previous review was held on May 4, 2018.<sup>3</sup> As a result of the review, Russia received 317 recommendations, 191 of which Russia accepted.<sup>4</sup> One recommendation in particular that was made by New Zealand, was that the government "[u]phold the rights to freedom of conscience and religion by refraining from outlawing religious groups as 'extremist' solely for the peaceful practice of their religious beliefs, such as has happened with Jehovah's Witnesses."<sup>5</sup> It was also recommended by Australia, and supported by Russia, that the government "[o]bserve constitutional guarantees of freedom of religion and ensure religious groups are not subject to discrimination."<sup>6</sup> It was also recommended by Bosnia and Herzegovina, and supported by Russia, that the government "[t]ake further measures to effectively combat trafficking in human beings, especially regarding vulnerable groups such as women and children, and improve assistance to the victims of trafficking."<sup>7</sup>

## **Legal Framework**

### *Religious Persecution*

4. Under Article 28 of Russia's Constitution, "[e]veryone shall be guaranteed freedom of conscience and religion, including the right to profess individually or collectively any religion or not to profess any religion, and freely to choose, possess and disseminate religious and other convictions and act in accordance with them."<sup>8</sup>

5. Under Article 5.26—Violation of the law about liberty of conscience, religious liberty and about religious associations—of the Russian Federation Code of Administrative Violations:

3. Implementation of activities by the religious organization without specifying of the official full name, including release or distribution within missionary activities of literature, printed, audio-and video records not marked with the specified name or with incomplete or obviously false marking, -

attracts imposing of administrative penalty at the rate from thirty thousand to fifty thousand rubles with confiscation of literature, printed, audio-and video records.

4. Implementation of missionary activities with violation of requirements of the legislation on liberty of conscience, religious liberty and about religious associations -

attracts imposing of administrative penalty on citizens at the rate from five thousand to fifty thousand rubles; on legal entities - from hundred thousand to one million rubles.

5. The violation provided by part 4 of this Article, made by the foreign citizen or the stateless person -

attracts imposing of administrative penalty at the rate from thirty thousand to fifty thousand rubles with administrative expulsion out of limits of the Russian Federation or without that.<sup>9</sup>

6. Chapter 24 of the Religion Law defines missionary activity:

For the purposes of this federal law, missionary activity is recognised as the activity of a religious association, aimed at disseminating information about its beliefs among people who are not participants (members, followers) in that religious association, with the purpose of involving these people as participants (members, followers). It is carried out directly by religious associations or by citizens and/or legal entities authorised by them, publicly, with the help of the media, the internet or other lawful means.<sup>10</sup>

7. Furthermore, under Article 282.2 of the Criminal Code of Russia, individuals found to be participating in or organizing the “activity of a public or religious association or of another organization, with respect to which the court has adopted an already enforced decision on the liquidation the prohibition of the activity in connection with the performance of an extremist activity” can be fined up to 300 thousand rubles or can be arrested “for a term from four to six months, or by imprisonment for a term of up to three years.”<sup>11</sup>

8. Russia is a party to the International Covenant on Civil and Political Rights (ICCPR).<sup>12</sup> Under Article 18 of the ICCPR:

1. Everyone shall have the right to freedom of thought, conscience and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private, to manifest his religion or belief in worship, observance, practice and teaching.

2. No one shall be subject to coercion which would impair his freedom to have or to adopt a religion or belief of his choice.

3. Freedom to manifest one's religion or beliefs may be subject only to such limitations as are prescribed by law and are necessary to protect public safety, order, health, or morals or the fundamental rights and freedoms of others.<sup>13</sup>

### *Human Trafficking*

9. Under Article 127.1 of the Criminal Code of Russia, “[h]uman beings’ trafficking, that is, a human being’s purchase and sale or his recruiting, transportation, transfer, harbouring or receiving for the purpose of his exploitation – shall be punishable by deprivation [of] liberty for a term of up to five years.”<sup>14</sup>

10. Additionally, under Article 127.2, “[u]sing the labour of a person in respect of which authority is exercised which is akin to ownership, where the person cannot refuse to carry out works (services) for reasons independent of him – shall be punishable by deprivation of liberty for a term of up to five years.”<sup>15</sup>

11. Furthermore, under Article 8 of the ICCPR, “[n]o one shall be held in slavery; slavery and the slave-trade in all their forms shall be prohibited. No one shall be held in servitude.”<sup>16</sup>

12. Russia is also a party to the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.<sup>17</sup> Under Article 9, section 1 of this Protocol:

1. States Parties shall establish comprehensive policies, programmes and other measures:

(a) To prevent and combat trafficking in persons; and

(b) To protect victims of trafficking in persons, especially women and children, from revictimization.<sup>18</sup>

### **Religious Persecution**

13. Freedom of religion is enshrined within the Constitution of Russia. However, Russia’s laws serve to restrict and eradicate freedom of religion.<sup>19</sup> As a result of Russia’s laws mentioned above, “[f]ines, confiscation, and even imprisonment are possible penalties for evangelism or hosting a foreign religious speaker.”<sup>20</sup> One Christian youth pastor, explained how these laws make it difficult for Christians in Russia to operate:

Based on this law, which is active right now, if you declare that you [believe] this or that or if you [publicly] invite someone to church, or if you share an invitation to a Christian conference or service on facebook, sometimes even if you just attend church you will receive a huge fine or you can be jailed for up to 3 years. . . . It’s not like you have much of a choice; you can either be quiet, or try not to be afraid and continue sharing your faith. Some Christians were imprisoned, others were trying to move across the border into Finland.<sup>21</sup>

14. The pastor also shared how his church events were raided by Russian police:

[W]e had a youth Christian concert at a church, and we invited some students, and a speaker from Ukraine. Some police and domestic security officials ran into the building, and stopped everybody and held people hostage, and we had a large group of people in attendance. They wouldn’t let anybody leave the building. And when we asked what was happening, law enforcement said they

suspected a terrorist attack, so they wanted each person's first and last name and their passport number. There were no terrorists in the building, they just wanted the information on the college students, to gain access to their educational establishments to start pressuring people.<sup>22</sup>

15. Additionally, over the past five years, "Jehovah's Witnesses have been subjected to raids, arrests and prosecution in Russia."<sup>23</sup> Their headquarters have been seized and their publications banned. This has been a result of the Russian Supreme Court labeling Jehovah's Witnesses as an "extremist group" in 2017.<sup>24</sup>

16. On January 12, 2023, "[t]he Court in Kyzyl sentenced Anatoliy Senin to six years suspended sentence for his faith."<sup>25</sup> The judge "considered the discussion of the Bible among fellow believers to be an organization of extremist activity."<sup>26</sup>

17. In November 2022, an Evangelical church leader and his son were tortured and killed by Russian forces in Ukrainian territory under Russia's control.<sup>27</sup> "[W]hen the Russian troops arrested the father and son, the soldiers claimed: 'Your church has no right to exist, as it has connections with America and other western countries.'<sup>28</sup>

18. On November 15, 2022, the Oktyabrsky District Court of Novosibirsk sentenced Aleksandr Seredkin to six years in a penal colony because the court viewed "holding religious meetings, saying prayers and reading the Bible" as an extremist activity.<sup>29</sup>

19. On November 8, 2022, a judge found "Dmitriy and Nadezhda Semenov guilty of extremism and appointed 4 years suspended sentence to each."<sup>30</sup> On September 2021,

a search was conducted in their house, the believers were interrogated and then released on recognizance not to leave. Three days before, the investigator of the Investigative Committee of the Russian Federation for the Kamchatka Territory, Maxim Kudantsev, opened a criminal case against the Semenovs under Part 1.1 of Art. 282.2 of the Criminal Code of the Russian Federation (involvement in the activities of an extremist organization).<sup>31</sup>

20. On November 7, 2022, a judge sentenced Andrey Danielyan to six years in prison in a penal colony after ruling that reading and discussing the Bible was an extremist activity.<sup>32</sup>

21. According to statistics released in October 2022, there are 110 Jehovah's Witnesses "either in prison or pretrial detention for practicing their faith in Russia and Crimea."<sup>33</sup> Furthermore, since 2017, "[n]early 350 Witnesses have spent time in prison."<sup>34</sup>

22. On September 8, 2022, Dmitry Dolzhikov was arrested and charged with "participating in the activities of an extremist organization because he attended Christian meetings and shared his faith with others."<sup>35</sup>

23. In February 2021, two Jehovah's Witnesses were sentenced to prison, one for six years and the other for two years, for "taking part in the activities of a banned organisation."<sup>36</sup>

24. In April 2019, Russian police "stormed in and interrupted a service commemorating Annunciation – a celebration of when the Virgin Mary was told by the angel Gabriel she would

give birth to Jesus.”<sup>37</sup> A few days later, the pastor of the church was charged with carrying out “illegal” missionary work.<sup>38</sup>

25. In 2018, “at least 56 organisations and 103 individuals faced prosecution under the ‘anti-missionary’ changes to the Religion Law and Administrative Code.”<sup>39</sup> Out of these prosecutions, the “courts imposed 132 initial convictions, with 129 fines.”<sup>40</sup>

26. Russia’s ban on “missionary activity” clearly violates its citizens’ right to religious freedom guaranteed under Russia’s Constitution and the ICCPR. Once again, Article 28 of the Constitution grants everyone the right to “profess individually or collectively any religion . . . and freely to choose, possess and disseminate religious and other convictions . . . .”<sup>41</sup> Additionally, under Article 18 of the ICCPR, everyone has the right “to manifest his religion or belief in worship, observance, practice and teaching.”<sup>42</sup> Christians, along with many other religions, are called to go out into the community to share their faith. Russia’s ban on “missionary activity” clearly prevents people from peacefully practicing their faith and goes further by actually punishing them if they do.

## Human Trafficking

27. Russia serves as a “source, destination and transit country for human trafficking.”<sup>43</sup> In fact, it is estimated that there are “794,000 people living in conditions of modern slavery in the Russian Federation today.”<sup>44</sup> The majority of human trafficking cases in Russia involve forced labor and the victims are largely migrant workers from Central Asia, Ukraine, Vietnam, China, Nigeria, and North Korea.<sup>45</sup> While many of these migrant workers travel to Russia legally, “this mass migration into Russia each year both provides cover for traffickers to recruit laborers and makes migrants more vulnerable to exploitation.”<sup>46</sup>

28. In Russia, traffickers lure vulnerable victims by promising their victims proper paperwork as well as a high-paying job.<sup>47</sup> Traffickers then “trap them in forced labor by withholding travel documents, refusing to pay wages, or exacting physical or psychological abuse.”<sup>48</sup>

29. For example, one victim, Anton Pogorelov, explains how he was traveling from Nizhny Novgorod to Moscow in search of a job.<sup>49</sup> While waiting on a train platform the victim started talking to a stranger who “offered him a ‘good job by the sea’ instead of moving to Moscow.”<sup>50</sup> Pogorelov followed the stranger to Dagestan to work in a brick factory.<sup>51</sup> However,

[u]pon arrival, the factory owner paid the recruiter 18,000 rubles, and told Pogorelov that he would need to work to pay off this debt that the owner had incurred on his behalf. Theoretically, Pogorelov’s salary of 10,000 rubles a month should’ve paid for this debt quickly, but when Pogorelov asked to be sent home three months later, he was denied. The factory owner told him that the cost of the cigarettes and alcohol he was given each day were taken from his salary so that he had not yet paid off his supposed debt. Even if he had, Pogorelov had no documents, no way to contact his family, and certainly no way to pay for transportation home. Incredibly, he was freed just a few months later by the anti-trafficking NGO Alternativa, but many spend decades working in forced labor.<sup>52</sup>

30. One sixteen-year-old girl living in southern Russia was offered \$500 to travel to the Middle East to bring back some merchandise that could be sold in Russia.<sup>53</sup> She was then told that instead, she would be working as a waitress in a café for \$1,000 a month.<sup>54</sup> However, after she arrived at her destination, the situation was much different.<sup>55</sup> Once she arrived, she “found out that she would not be a waitress, she would be a prostitute. Her passport was taken away, and she was threatened if she refused to obey or tried to run away.”<sup>56</sup> Eventually, with the help of the International Organization for Migration (IOM) and the Russian Embassy, she was rescued and returned home.<sup>57</sup>

31. In 2018, Amina was “sold into prostitution in Moscow by a Nigerian woman named Rose.”<sup>58</sup> She had been lured to Russia from Nigeria through a job agency. Once she arrived in Russia, “Rose confiscated her documents and told her she owed a \$50,000 debt.”<sup>59</sup> Thankfully, Amina’s sister thought something might be wrong and contacted a human trafficking hotline.<sup>60</sup> Three days later after calling the hotline, Amina along with six other Nigerian women were rescued from a brothel in Moscow.<sup>61</sup>

32. The full extent of human trafficking in Russia is likely unrealized. This is because “[m]any victims refuse to bring their cases to trial because there is a lack of protections for victims.”<sup>62</sup> Furthermore, many victims fail to be identified as human trafficking victims because authorities “routinely detained and deported forced labor victims without screening for signs of exploitation, and prosecuted victims forced into prostitution for prostitution offenses.”<sup>63</sup> Additionally, there are no government programs designated to assist victims of human trafficking or sexual exploitation and Russia rarely gives any funding to NGOs that work on combatting human trafficking.<sup>64</sup> All of these factors contribute to the fact that, between 2020 and 2021, Russia has only convicted one trafficker and has failed to initiate any new human trafficking prosecutions.<sup>65</sup>

## Recommendations

33. Russia must reform its laws and practices to protect religious freedom to comply with its own Constitution and its international commitments. Russia’s ban on “missionary activity” prevents Christians from practicing their faith as they cannot talk about their faith publicly or even invite people to their homes or churches without fear of being arrested or having their homes or places of worship raided by police. Additionally, Russia’s untenable labeling of religious groups, such as Jehovah’s Witnesses, as “extremist” infringes on the rights of individuals to practice their faith.

34. Clearly, Russia is not taking human trafficking in its country seriously. Russia has failed to adequately identify victims of human trafficking, prosecute perpetrators, and provide aid and assistance to victims. Russia must invest in resources and training for law enforcement personnel and prioritize investigation and victim identification. Additionally, Russia must also provide funding and resources to assist and rehabilitate victims of human trafficking.

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<sup>1</sup> *Russia*, THE WORLD FACTBOOK, <https://www.cia.gov/the-world-factbook/countries/russia/> (Mar. 2, 2023).

<sup>2</sup> *Id.*

<sup>3</sup> *Universal Periodic Review – Russian Federation*, OHCHR, <https://www.ohchr.org/en/hr-bodies/upr/ru-index> (Mar. 10, 2023).

<sup>4</sup> *Russian Federation Infographic 30th*, OHCHR, [https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session30/RU/RUSSIAN\\_FEDERATION\\_Infographic\\_30th.pdf](https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session30/RU/RUSSIAN_FEDERATION_Infographic_30th.pdf) (last visited Mar. 10, 2023).

<sup>5</sup> OHCHR, UPR of Russia Federation (3rd Cycle – 30th Session): Thematic List of Recommendations, <https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session30/RU/MatriceRecommendationsRussianFederation.docx> (last visited Mar. 10, 2023).

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> KONSTITUTSIIA ROSSIĬSKOĬ FEDERATSII [KONST. RF] [CONSTITUTION] art. 28 (Russ.), [https://www.constituteproject.org/constitution/Russia\\_2014?lang=en](https://www.constituteproject.org/constitution/Russia_2014?lang=en).

<sup>9</sup> KODEKS ROSSIĬSKOĬ FEDERATSII RF OB ADMINISTRATIVNYKH PRAVONARUSHENIYAKH [KOAP RF] [Code of Administrative Violations] art. 5.26 (Russ.), <https://cis-legislation.com/document.fwx?rgn=1404> (unofficial trans.).

<sup>10</sup> Victoria Arnold, *Russia: Sharing Belief Restrictions, Increased “Extremism” Punishments?*, FORUM 18 (July 4, 2016), [https://www.forum18.org/archive.php?article\\_id=2195](https://www.forum18.org/archive.php?article_id=2195).

<sup>11</sup> UGOLOVNYĬ KODEKS ROSSIĬSKOĬ FEDERATSII [UK RF] [Criminal Code] art. 282.2 (Russ.), [https://www.imolin.org/doc/amlid/Russian\\_Federation\\_Criminal\\_Code.pdf](https://www.imolin.org/doc/amlid/Russian_Federation_Criminal_Code.pdf).

<sup>12</sup> *Ratification Status for Russian Federation*, OHCHR, [https://tbinternet.ohchr.org/\\_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=144&Lang=EN](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=144&Lang=EN) (Mar. 10, 2013).

<sup>13</sup> International Covenant on Civil and Political Rights art. 18, *adopted* Dec. 16, 1966, 999 U.N.T.S. 171, <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights> [hereinafter ICCPR].

<sup>14</sup> UK RF Criminal Code art. 127.1 (Russ.).

<sup>15</sup> *Id.* art. 127.2.

<sup>16</sup> ICCPR art. 8, *supra* note 13.

<sup>17</sup> *A Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime*, UNITED NATIONS TREATY COLLECTION, [https://treaties.un.org/Pages/ViewDetails.aspx?src=ind&mtdsg\\_no=XVIII-12-a&chapter=18&clang=\\_en](https://treaties.un.org/Pages/ViewDetails.aspx?src=ind&mtdsg_no=XVIII-12-a&chapter=18&clang=_en) (last visited Mar. 13, 2023).

<sup>18</sup> Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime art. 9, § 1, *adopted* Nov. 15, 2000, 2237 U.N.T.S. 319, [https://treaties.un.org/doc/Treaties/2000/11/20001115%2011-38%20AM/Ch\\_XVIII\\_12\\_ap.pdf](https://treaties.un.org/doc/Treaties/2000/11/20001115%2011-38%20AM/Ch_XVIII_12_ap.pdf).

<sup>19</sup> Dani Wassell, *Relentless Religious Persecution in Russia*, RELIGIOUS FREEDOM INST. (2021), <https://religiousfreedominstitute.org/relentless-religious-persecution-in-russia/>.

<sup>20</sup> *Id.*

<sup>21</sup> *Living as a Persecuted Christian in Russia*, ARRIVE MINISTRIES (Nov. 21, 2019), <https://arriveministries.org/living-as-a-persecuted-christian-in-russia/>.

<sup>22</sup> *Id.*

<sup>23</sup> Kwasi Gyamfi Asiedu, *Jehovah’s Witnesses Flee Russia for Worship Without Fear*, ASSOCIATED PRESS (Mar. 6, 2022), <https://apnews.com/article/russia-ukraine-europe-religion-mexico-jehovahs-witnesses-6c995531ead746d354a99c8c10b50f61>.

<sup>24</sup> *Id.*

<sup>25</sup> *RUSSIA: Religious Persecution and Issues – Jan. 01.15*, HUM. RTS. WITHOUT FRONTIERS (Jan. 18, 2023), <https://hrwf.eu/russia-religious-persecution-and-issues-jan-01-15-bimonthly-news-digest/>.

<sup>26</sup> *Id.*

<sup>27</sup> Tola Mbakwe, *Russian Forces Torture and Kill Pastor and Son in Ukraine, as Warnings of Christian Persecution Persist*, PREMIER CHRISTIAN NEWS (Nov. 30, 2022), <https://premierchristian.news/en/news/article/russian-forces-torture-and-kill-pastor-and-son-in-ukraine-as-warnings-of-christian-persecution-persist>.

<sup>28</sup> *Id.*

<sup>29</sup> *RUSSIA: Religious Persecution and Issues/Bimonthly Digest, Nov. 01-15*, HUM. RTS. WITHOUT FRONTIERS (Nov. 17, 2022), <https://hrwf.eu/russia-religious-freedom-and-issues-bimonthly-digest-01-15-11-2022/>.

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

<sup>32</sup> *Id.*



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<sup>33</sup> *Number of Witnesses Currently in Prison in Russia and Crimea Surpasses 100*, JEHOVAH'S WITNESSES (Oct. 28, 2022), <https://www.jw.org/en/news/jw/region/global/Number-of-Witnesses-Currently-in-Prison-in-Russia-and-Crimea-Surpasses-100/>.

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> Brendan Cole, *Russia Accused of 'New Low' in Jehovah's Witnesses Crackdown After Woman, 69, Jailed*, NEWSWEEK (Feb. 25, 2021, 7:26 AM), <https://www.newsweek.com/russia-religion-jehovahs-witnesses-persecution-1571980>.

<sup>37</sup> Adam Smith, *Christianity Crackdown: Churches Demolished as Pastor Arrested in Russia*, EXPRESS (Apr. 26, 2019, 9:46 PM), <https://www.express.co.uk/news/world/1119566/christianity-crackdown-russia-persecution-christian-news>.

<sup>38</sup> *Id.*

<sup>39</sup> Victoria Arnold, *Russia: 159 Known "Anti-Missionary" Prosecutions in 2018*, FORUM 18 (May 6, 2019), [https://www.forum18.org/archive.php?article\\_id=2474](https://www.forum18.org/archive.php?article_id=2474).

<sup>40</sup> *Id.*

<sup>41</sup> KONST. RF CONSTITUTION art. 28 (Russ.).

<sup>42</sup> ICCPR art. 18, *supra* note 13.

<sup>43</sup> *Russia*, GLOB. ORGANIZED CRIME INDEX, <https://ocindex.net/country/russia> (last visited Mar. 10, 2023).

<sup>44</sup> *Human Trafficking: The Secret to Putin's Economy*, HARV. INT'L REV. (Nov. 25, 2020, 9:00 AM), <https://hir.harvard.edu/putin-and-human-trafficking/>.

<sup>45</sup> *Id.*

<sup>46</sup> *Id.*

<sup>47</sup> *Id.*

<sup>48</sup> *Id.*

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

<sup>51</sup> *Id.*

<sup>52</sup> *Id.*

<sup>53</sup> Maria Melnikova, *Human Trafficking: Irina's Story*, UNITED NATIONS OFF. ON DRUGS & CRIME, <https://www.unodc.org/newsletter/en/200501/page008.html> (last visited Mar. 10, 2023).

<sup>54</sup> *Id.*

<sup>55</sup> *Id.*

<sup>56</sup> *Id.*

<sup>57</sup> *Id.*

<sup>58</sup> Madeline Roache, *Putin Doesn't Care About Sex Trafficking*, FOREIGN POLICY (July 13, 2018, 9:35 AM), <https://foreignpolicy.com/2018/07/13/putin-doesnt-care-about-sex-trafficking-russia-nigeria-world-cup-soccer/>.

<sup>59</sup> *Id.*

<sup>60</sup> *Id.*

<sup>61</sup> *Id.*

<sup>62</sup> *Human Trafficking: The Secret to Putin's Economy*, *supra* note 44.

<sup>63</sup> *'Worst Human Traffickers' Include Russia, Belarus, Iran, Turkmenistan*, RADIO FREE EUROPE RADIO LIBERTY (June 29, 2018), <https://www.rferl.org/a/russia-belarus-iran-turkmenistan-human-traffickers-report/29326302.html>.

<sup>64</sup> Gelia Bessmertnaya, *The Story of Eurydice, The First Grassroots Initiative Against Sex Trafficking in Russia*, NORDIC MODEL NOW! (Sept. 30, 2022), <https://nordicmodelnow.org/2022/09/30/the-story-of-eurydice-the-first-grassroots-initiative-against-sex-trafficking-in-russia/>.

<sup>65</sup> Luiz Romero, *There is No Evidence that Putin Invaded Ukraine to Fight Child Trafficking*, POLITIFACT (Mar. 18, 2022), <https://www.politifact.com/factchecks/2022/mar/18/facebook-posts/there-no-evidence-putin-invaded-ukraine-fight-chil/>.