



IN THE EUROPEAN COURT OF HUMAN RIGHTS

APP. NO. 19835/18

BETWEEN

ANDREY VLADIMIROVICH RUDOY

Applicant

- and -

THE RUSSIAN FEDERATION

Respondent

THIRD-PARTY INTERVENTION SUBMISSION BY
ARTICLE 19: GLOBAL CAMPAIGN FOR FREE EXPRESSION

Submitted on 10 June 2022

INTRODUCTION

1. This third-party intervention is submitted on behalf of *ARTICLE 19: Global Campaign for Free Expression* (ARTICLE 19). We welcome the opportunity to intervene in this case, by leave of the President of the Court, granted on 20 September 2021, with the extension granted on 20 May 2022, pursuant to Rule 44 (3) of the Rules of Court.
2. The present case concerns the arrest and fine of the applicant, following his publication of a message on social media. In this message, the applicant stated that he would hold a solo demonstration against an increase in public transport fares; he also invited others to come to support him and sign a petition. That message drew [the](#) attention of policemen who monitored social networks. Subsequently, the police gave the applicant a warning against breaching the legal provisions on the conduct of public events. The applicant was subsequently arrested and fined for a failure to notify his public event in which about thirty people had taken part.
3. ARTICLE 19 believes that this case raises fundamental questions as to the scope of application and necessity of notification and authorisation regimes to hold so called “solo demonstrations” and announcing and organising such demonstrations through social media. This case is also an opportunity for the Court to examine to what extent can law enforcement authorities monitor social media for the purposes of preventing ‘illegal activities’ (albeit in this case, ‘illegal activity’ was actually an exercise of peaceful assembly). The decision will set an important precedent on the intersection between Article 8 and Articles 10 and 11, in respect of the use of technology to exercise the latter and the role of the States in interfering with these rights before, during and after a protest.
4. In these submissions, the Intervener addresses the following:
 - a) An overview of international and comparative standards on the obligation to notify the authorities on organising assemblies in advance of organising protests through formal procedure;
 - b) Based on international and comparative standards, outline to what extent law enforcement authorities can monitor social media in relation to protests, and what safeguards and procedures for storing, accessing, examining, communicating, using and destroying the data recovered as a result of such monitoring are required to meet the “quality of law” and prevent misuse;
 - c) The context of the right to protest in Russia and to what extent law enforcement authorities facilitate the right to freedom of assembly in Russia and the ability to organise protests through social media.

SUBMISSIONS

- a) **Obligation of an advance notification about organising assemblies under international and comparative human rights standards**
5. International human rights standards, including the European Convention of Human Rights (the Convention) and the International Covenant on Civil and Political Rights (the ICCPR) allow for limitations based on explicit grounds, including the protection of public safety (ordre public), the protection of public health or morals or the protection of the rights and freedoms of other.” The question is to what extent the enforcement of a notification requirement is compatible with the

three-part test of restrictions (legality, legitimate interest and necessity and proportionality).

6. ARTICLE 19 submits that under the international human rights framework, there is a presumption in favour of the right of peaceful assembly which presupposes that individuals should not have to seek permission from the government to exercise the right to peaceful assembly. At most, and only for the purpose of enabling authorities, where necessary, to take measures to facilitate a peaceful assembly, voluntary regimes for notification should be in place. The presumption in favour of peaceful assembly should also carry with it a responsibility on the part of public officials to not engage in expression or practices to stigmatise assemblies or their participants, but rather recognise protests as legitimate and important forms of public participation.
7. The jurisprudence of the **Human Rights Committee** (the HR Committee) strongly supports a presumption in favour of the right of peaceful assembly, evidenced by the significant number of communications in which a violation of Article 21 of the ICCPR was found for the rejection of notifications.¹ The Committee has routinely criticised States that operate *de jure* or *de facto* authorisation regimes,² reiterating the principle that the only legitimate purpose of notification regimes is to enable the authorities to facilitate the exercise of rights.³ It has implied support for notification periods of 48 hours.⁴ The Committee has also recognised that spontaneous assemblies fall within the scope of Article 21 of the ICCPR (providing for the right to peaceful assembly), and should be specifically protected in law,⁵ a principle supported by other treaty bodies and regional mechanisms.⁶ Moreover, failure to notify should never be the basis for dispersing an assembly.⁷
8. Similarly, **UN special procedures** have encouraged States to reflect this presumption in national legal frameworks, and asserted that “no assembly should be treated as an unprotected assembly.”⁸ For instance, the UN Special Rapporteur on the Rights to Freedom of Peaceful Assembly and of Association has previously stated that the exercise of the right to assembly should “be governed at most by a regime of prior notification regarding the holding of peaceful assemblies, in lieu of a regime of authorisation.”⁹
9. The **OSCE-ODIHR** and Venice Commission’s *Guidelines on Freedom of Peaceful Assembly* establish that there is a need to limit prior notification requirements to what is essential and only for a legitimate aim: “[I]n an open society, many types of assembly do not warrant any form of official regulation. Prior notification should, therefore, only be required where its purpose is to enable the State to put in place necessary arrangements to facilitate freedom of assembly and to protect public order, public safety and the rights and freedoms of others.”¹⁰ The Guidelines also add that spontaneous protests should be exempted from the prior notification requirements.¹¹ In the Explanatory Notes, the OSCE goes further and suggests exempting assemblies from the prior notification requirements if no disruption is reasonably expected: “It is good practice to require notification only when a substantial number of participants are expected or only for certain types of assembly. In some jurisdictions there is no notice requirement for small assemblies... or where no significant disruption of others is reasonably anticipated by the organisers (such as might require the redirection of traffic).”¹²
10. ARTICLE 19 submits that this Court has made similar conclusions in a number of cases. In particular:
 - In *Oya Ataman v. Turkey*, the Court noted that organisers of demonstrations should in principle respect the applicable rules and that “notification would have enabled authorities to... minimise the disruption to traffic that the demonstration could have caused.”¹³ It went on to add that there “were at most fifty people, who wished to draw attention to a topical

issue” and there was “no evidence to suggest that the group in question represented a danger to public order, apart from possibly disrupting traffic.” The Court concluded that while the assembly was technically unlawful¹⁴ the dispersal of the assembly constituted a violation of the right to freedom of peaceful assembly.

- In *Novikova and Others v. Russia*, the Court summarises its position on the enforcement of notice requirements: “While rules governing public assemblies, such as the system of prior notification, may be essential for the smooth conduct of public demonstrations, in so far as they allow the authorities to minimise the disruption to traffic and take other safety measures, their enforcement cannot become an end in itself... The Court reiterates its constant position... that a situation of unlawfulness, such as one arising under Russian law from the staging of a demonstration without prior notification, does not necessarily (that is, by itself) justify an interference with a person’s right to freedom of assembly... The domestic authorities’ reaction to a public event remains restricted by the proportionality and necessity requirements of Article 11 of the Constitution.”¹⁵

11. From a comparative perspective, we note that in 2011, the African Commission on Human and Peoples’ Rights set up a Study Group on Freedom of Association, which was later extended to include freedom of assembly.¹⁶ In its 2015 report, the Study Group highlighted that the purpose of a prior notification regime is not to control the exercise of freedom of assembly but to enable the State to meet its obligation to facilitate gatherings.¹⁷

12. Based on the foregoing, ARTICLE 19 submits that it is clear from international human rights standards that:

- Freedom of assembly as a right should not require a prior authorisation from the State;
- Any prior-notification system shall be nonburdensome. If notification procedures were onerous or bureaucratic, this would interfere with the exercise of the right to freedom of assembly. Too many obstacles will inevitably discourage people from trying to organise a protest if the notification procedure is too complicated;
- A system of notification must not function as a *de facto* authorisation but have the sole *rationale* to allow authorities to facilitate the peaceful assembly and take measures to protect public safety and order, as well as the rights and freedoms of others. While a system of voluntary notification could also serve the purpose of ensuring cooperation between organisers and authorities – in the sense that a voluntary notification would show a peaceful intent – the failure to notify the authorities, particularly in cases where such a notification would have been impracticable to ensure the realisation of the demonstration, should not *prima facie* make an assembly illegal.¹⁸

13. As for individual demonstrators, ARTICLE 19 believes that the participant should not be required to provide advance notification to the authorities of their intention to demonstrate. If the solo demonstrator is joined by others, the demonstration should then be considered as a spontaneous assembly.¹⁹

b) Extent to which law enforcement authorities can monitor social media in relation to protests and safeguards against abuse

14. Monitoring, mapping, and storing users’ posts and other activity on social media by law enforcement can intrude upon their privacy rights, even where the data is otherwise viewable

by the public or a portion of the public.²⁰ This data can provide a revealing picture of an individual's personal life, preferences, associates, and activities, particularly when monitored and collected over an extended time period or when combined with network or metadata analysis.

15. ARTICLE 19 observes that for authoritarian and democratic governments alike, social media surveillance presented a staggering potential for abuse. For instance, the 2019 Freedom House report found that 47 out of the 65 countries the organisation assessed, arrests for political, social or religious speech were at a record high.²¹ The research also indicates that social media monitoring undoubtedly has a chilling effect on freedom of expression as logically, activists and protesters might think twice before speaking out if they fear retaliation. People who suspect or fear that the government is monitoring their messages will be more likely to self-censor and avoid certain topics of political and social nature.²² This hinders the contributions to public debate. For instance, a Citizen Lab survey further demonstrates this chilling effect on freedom of expression, 62% of respondents said they would be less or somewhat likely to “speak or write about certain topics online” if they were aware of government surveillance.²³ Available information from media reporting and other publicly available sources suggests that social media surveillance by law enforcement disproportionately targets communities of colour and other marginalised communities.²⁴
16. These concerns have been echoed by the UN special procedures. For instance, in 2019, the UN Special Rapporteur on Freedom of Association and Assembly stated that “[t]he use of surveillance techniques for the indiscriminate and untargeted surveillance of those exercising their right to peaceful assembly and association, in both physical and digital spaces, should be prohibited.”²⁵ Similarly, the UN General Assembly has recognised that “surveillance of digital communications must be consistent with international human rights obligations and must be conducted on the basis of a legal framework, which must be publicly accessible, clear, precise, comprehensive and non-discriminatory.”²⁶
17. Despite human rights concerns about social media monitoring by law enforcement, the issue is not explicitly addressed in international human rights framework. From a comparative perspective, ARTICLE 19 wishes to highlight that the EU Law Enforcement Directive²⁷ (LED) provides rules on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties. The LED is part of the European data protection package that compliments the GDPR. This law is intended to focus on criminal matters and in particular activities carried out by the police. The LED has some similar obligations to the GDPR but also distinct ones, such as follows:
 - Where applicable and as far as possible, to make a clear distinction between personal data of different categories of data subjects, such as persons convicted of a criminal offence, victims of a criminal offence, other parties to a criminal offence etc. (Article 6);
 - Distinguish between personal data (personal data based on facts/personal data based on personal assessments) and ensure the quality of personal data (Article 7);
 - Processing must be lawful, i.e. necessary for the performance of a task carried out by a competent authority, for the purposes of this Directive, and based on Union law or Member State law (Article 8);
 - Processing of special categories of data is allowed only where strictly necessary (Article 10).

18. Regarding the surveillance of communication data, ARTICLE 19 notes that this Court also set out minimum standards that must apply when any type of secret surveillance is happening. Secret surveillance, including access to metadata, should respect “*minimum safeguards that should be set out in statute law in order to avoid abuses of power.*”²⁸ These safeguards include the nature of the offences, a definition of the categories of people liable to have their communications intercepted, a limit on the duration of such measures, the procedure to be followed for examining, using and storing the data obtained; the precautions to be taken when communicating the data to other parties; and the circumstances in which recordings may or must be erased or the tapes destroyed.²⁹
19. At the level of soft standards, ARTICLE 19 also highlights the civil society initiative that developed the International Principles on the Application of Human Rights to Communications Surveillance.³⁰ The Principles state that any legitimate surveillance must comply with 13 principles, including the “only way to achieve a legitimate aim” and that any surveillance must be “proportionate to achieve a legitimate aim.” Any social media monitoring programme by law enforcement should at minimum meet these standards.
20. Overall, social media surveillance by law enforcement is still a grey area with not many national, regional or international standards that explicitly deal with the issue. The relationship between social media and law enforcement is yet to be established explicitly, whether that is police using social media to track down participants at a protest or them using social media prior to the protest itself.

c) Context of the right to protest in Russia

21. Even prior to the Russian invasion of Ukraine and crackdown on protests against the invasion, the overall situation of the exercise of human rights in Russia has been dire. This submission does not address the recent events and crackdown but the state of the protection of assemblies and protests prior to the invasion of Ukraine.
22. In the context of the right to protest, Russia has been increasingly adopting restrictive laws that make meaningful protest in Russia almost impossible. Criminal prosecutions and crackdowns on dissent have been on the rise over the years. It should also be noted that the Federal Law on Assemblies, Rallies, Demonstrations, Marches and Pickets (Russian Protest Law) has been amended 13 times since it was adopted in 2004 and each time has seen greater restrictions imposed on assemblies.
23. Despite the COVID-19 pandemic, thousands took to the streets in early 2021 to protest against the arrest of opposition leader Alexei Navalny and demand his release. However, these protests took on a much larger scale, the arrest of Navalny has been seen as a trigger but the root issues remain the deteriorating economic situation and growing inequalities in the country. Estimated as having as high as 300,000 participants across the country, this has been Russia’s highest protest movement this past decade. This also goes hand in hand with the number of arrests being the highest in Russia’s recent history. In Moscow, around 1,5000 people were detained with the number surpassing 3,500 across the country.³¹ In January 2021, the Commissioner for Human Rights expressed concerns about the crackdown on individuals in Russia “expressing critical views of those in power.” They added that Russian authorities needed to “ensure the respect of Russian citizens’ freedoms of assembly and expression and to refrain from taking any disproportionate measures against peaceful protesters.”³² The number of detentions has been recorded as the highest ever in the modern history of Russia.³³ There were also many reports about excessive use of force by police officers during protests. For example, in January 2021,

Margarita Tudina ended up in intensive care after being kicked in the stomach by a police officer during a peaceful protest.³⁴

Sanctions for violating protest regulations

24. Those who violate protest regulations are subject to disproportionate sanctions. Indeed, there are currently 17 possible violations of the Law of Assemblies, including organising an assembly in violation of the established procedure and participating in such an assembly. The sanctions for violating the Law on Assemblies have got more restrictive over time. In 2012, administrative detention for up to 15 days was only possible for protests near nuclear facilities (one of the violations). Today, however, 11 of the 17 violations can result in administrative detention for a maximum of 30 days and 14 of the violations can result in up to 200 hours of community service.³⁵ The Law also criminalises the participation in more than one unsanctioned protest within a period of 180 days. The increase in sanctions shows how freedom of assembly is being more and more restricted. Severe and disproportionate sanctions contribute to an overall chilling effect on the exercise of the right.
25. In 2019, ARTICLE 19 reported on the crackdowns that were already happening against the right to protest in Russia citing the misuse of problematic regulations to criminalise protest and target dissent. In July 2019, protesters took to the streets in Moscow. Police and the National Guard declared the protests “unauthorised” and arrested and detained hundreds of protesters as a result. At least 15 people were sentenced to jail for violating the Russian Protest Law.³⁶

Surveillance and monitoring tools

26. Russia has used surveillance tools against dissent for many years. In 2012, the government issued three tenders for the development of research methods related to “social networks intelligence”, “tacit control on the internet”, and “a special software package for the automated dissemination of information in large social networks.” In 2019, another tender was issued for technology to collect, analyse, and conduct sentiment analysis on social media content relating to President Vladimir Putin and other topics of interest to the Government.³⁷ This is concerning, especially as protest-related arrests, internet shutdowns and legal restrictions in Russia continue to rise. This hints that monitoring technology is simply a tool to add to the government’s crackdown on dissent.
27. Social media became a massive tool for protesters to coordinate protests. For instance, in connection to Navalny support protests, posts on social media networks were flooded with support messages for Navalny and calls for action. It was reported that police visited the homes of activists, journalists and individuals who were “subscribers to pro-Navalny social media sites to intimidate them.”³⁸ Police even blamed “the media, the Internet and social networks” for organising protests and have put pressure on TikTok to remove pro-Navalny content. Social media companies were threatened with fines if they failed to do so.³⁹
28. It was alleged that the Russian government was shutting down social media companies over the content relating to the Navalny protests. In the wake of these protests, the Roskomnadzor, the Russian regulatory agency, announced that “it was throttling citizens’ access to Twitter.” The blocking was justified on the grounds of Twitter’s failure to remove content relating to drugs and pornography. However, court cases also appeared to have been filed on the grounds of “failing to remove content calling for teenagers to attend unauthorised protests following Mr Navalny’s arrest”.⁴⁰
29. ARTICLE 19 also notes that the restrictions on social media and protests should be seen in the context of other laws in Russia that seek to regulate social media. Most recently, the Law on Activities of Foreign Internet Companies⁴¹ introduced in late May 2021 obliged any foreign

entity or individual that has an online website with over 500,000 daily users to place an electronic form on their website to receive appeals from Russian citizens and establish a local office in Russia. This complimented a previously adopted law that obliged social networks to proactively monitor their content to limit access to certain types of information. ARTICLE 19 warned that this law enabled mass online censorship.⁴² The consequences of not complying with these laws are important: heavy fines and complete blocking of their websites in Russia. The blocking of social media in Russia would be catastrophic for the movements organising and protesting against the government.⁴³

CONCLUSION

30. Based on the foregoing, ARTICLE 19 submits that the notification regime for assemblies must not be misused to limit the right to protest, especially spontaneous and “solo” assemblies. Monitoring of users’ posts on social media by law enforcement can intrude upon human rights even where such information is otherwise viewable by the public or a portion of the public. Although there are no explicit standards on the monitoring of social media posts by law enforcement, the extent to which data reveals intimate and detailed information is relevant to the question of whether such monitoring should be restricted by a warrant or other heightened protections. The available information also shows a widespread crackdown against the right to protest in Russia and the misuse of problematic legislation to criminalise protest and target dissent. It is therefore submitted that the restrictions on the right to protest of the applicant in this particular case have been carried out as part of a wider campaign to silence and eliminate dissent and opposition in the country or any criticism of the government

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¹ See, for example: a series of HR Committee decisions on Belarus and on Russia: Belarus, *Poplavny*, 2015; Belarus, *Statkevich*, 2015; Belarus, *Pugach*, 2015; Belarus, *Sudalenko*, December 2015; Belarus, *Sudalenko*, May 2015; Belarus, *Evrezov*, 2015; Belarus, *Kozlov*, 2015; Belarus, *Kirsanov*, 2014; Belarus, *Poliakov*, 2014; Belarus, *Youbko*, 2014; Russia, *Alekseev*, 2013; Belarus, *Turchenyak*, 2013; Belarus, *Sekerko*, 2013; Belarus, *Govsha*, 2012; Russia, *Chebotareva*, 2012

² See, for example: HR Committee, Concluding Observations on Mali, CCPR/C/MWI/CO/1, 18 June 2012, at para 17; Concluding Observations on Jordan, CCPR/C/JOR/CO/4, 18 November 2010, at para 15; Concluding Observations on the Republic of Korea, CCPR/C/KOR/CO/4, 3 December 2015, at para. 15; Concluding Observations on Ukraine, CCPR/C/UKR/CO/7, 22 August 2013, para 21.

³ HR Committee, *Kivenmaa vs Finland*, Communication No. 412/1990, 31 March 1994.

⁴ HR Committee, Concluding Observations on Malawi, CCPR/C/MWI/CO/1, 18 June 2012, para 17.

⁵ HR Committee, Concluding Observations on Switzerland (2017). See also: HR Committee, *Bazarov v. Belarus* (2014).

⁶ See various opinions by the Venice Commission and OSCE/ODIHR: Joint Opinion on the Draft Law on Assemblies of the Kyrgyz Republic CDL-AD(2009)034, at 36; Joint Opinion on the Order of Organising and Conducting Peaceful Events of Ukraine CDL-AD(2009)052, at 23; ECtHR, *Eva Molnar vs Hungary*, Appl. no. 10346/05 (2009); ECtHR, *Ezelin vs France*, Appl. no. 11800/85 (1991); ECtHR, *Christians against Racism and Fascism vs. the United Kingdom*, App. No. 9440/78 (1980).

⁷ European Court for Human Rights (the European Court), *Bukta & Others vs Hungary*, Appl. no. 25691/04 (2007), para 36.

⁸ Joint report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association and the Special Rapporteur on extrajudicial, summary or arbitrary executions on the proper management of assemblies, 4 February 2019, A/HRC/31/66, at 17(a). See also, ARTICLE 19, *The Rights Protest Principles, 2015*, Principle 6.

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- ⁹ Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association, Maina Kiai, 24 April 2013.
- ¹⁰ OSCE-ODIHR and Venice Commission, Guidelines on Freedom of Peaceful Assembly, 2nd edition, 2010.
- ¹¹ *Ibid.*, para. 25
- ¹² *Ibid.*, Explanatory Notes, para. 115.
- ¹³ European Court, *Oya Ataman v. Turkey*, 5 December 2006, paras 4-7
- ¹⁴ *Ibid.*, para 39
- ¹⁵ European Court, *Novikova and Others v. Russia*, 26 April 2016, para 136.
- ¹⁶ The African Commission on Human and Peoples' Rights (ACHPR), Resolution ACHPR/Res.229 (LII) 12 on the extension of the deadline for the study on freedom of association and extension of the scope of the study to include freedom of peaceful assembly in Africa, 22 October 2012
- ¹⁷ ACHPR, Report of the Study Group on Freedom of Association and Assembly in Africa, 2015, p. 60.
- ¹⁸ Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association, A/68/299, 7 August 2013, para 24
- ¹⁹ OSCE, Guidelines on Freedom of Peaceful Assembly, 2007
- ²⁰ See e.g. Jeramie D. Scott, Social Media and Government Surveillance: The Case for Better Privacy Protections for Our Newest Public Space, 12 J. BUS. & TECH. L. 151 (2017); or Jeramie D. Scott, Selling You Out: Mass Public Surveillance for Corporate Gain, THE HILL (Mar. 16, 2018).
- ²¹ Freedom House, Freedom on the Net 2019 Key Finding: Governments harness big data for social media surveillance, 2019
- ²² PEN America, Chilling Effects: NSA Surveillance Drives U.S Writers to Self-Censor, 2013
- ²³ Citizen Lab, Internet surveillance, regulation, and chilling effects online: a comparative case study, 26 May 2017.
- ²⁴ *See for example*: The Brennan Center for Justice, How to Reform Police Monitoring of Social Media, 9 July 2020.
- ²⁵ Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association, A/HRC/41/41 17 May 2019, para 57.
- ²⁶ U.N. General Assembly Resolution on the Right to Privacy in the Digital Age, U.N. Doc. A/ RES/71/199, 19 Dec. 2016 ("2016 U.N. General Assembly Resolution on the Right to Privacy in the Digital Age"); see also U.N. Human Rights Council Resolution on the Right to Privacy in the Digital Age, U.N. Doc. A/HRC/34/7, 23 Mar. 2017 ("2017 U.N. Human Rights Council Resolution on the Right to Privacy in the Digital Age") ("1. Recalls that States should ensure that any interference with the right to privacy is consistent with the principles of legality, necessity and proportionality").
- ²⁷ Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016.
- ²⁸ European Court, *Weber and Saravia v. Germany*, App. No. 54934/00, 29 June 2006, para 95.
- ²⁹ *Ibid.*
- ³⁰ International Principles on the Application of Human Rights to Communications Surveillance, 10 July 2013.
- ³¹ LSE, Anger and disenchantment: Why Russia's protests are not just about Navalny, February 2021.
- ³² Commissioner for Human Rights (Council of Europe), Russian authorities should release Alexey Navalny and guarantee freedoms of expression and of assembly, January 2021.
- ³³ France 24, Russian police violence under review after mass arrests at Navalny protests, 24 January 2021.
- ³⁴ Amnesty International, Russian Federation: Assaulted peaceful protester denied justice: Margarita Yudina, 12 February 2021.
- ³⁵ Amnesty International, Russia: No Place for Protest, 27 July 2019.
- ³⁶ ARTICLE 19, Russia: Drop charges against protesters and protect the right to protest, 11 September 2019.
- ³⁷ Freedom House, Social Media Surveillance, 2019.
- ³⁸ TRT World, Protests uploaded: Social media and Russia's protests, February 2021.
- ³⁹ DW, Russia pressures TikTok ahead of pro-Navalny rallies, January 2021.
- ⁴⁰ SKY news, Russia sues social media companies and throttles Twitter over Navalny protest content, March 2021.
- ⁴¹ *See* Law No. 1176731-7, On the activities of foreign persons in the information and telecommunication network "Internet" on the territory of the Russian Federation.
- ⁴² ARTICLE 19, Russia : Laws enabling massive online censorship must be repealed, 15 February 2021.
- ⁴³ *Ibid.*