

IHF FOCUS: elections; freedom of expression and media; freedom of association; judicial system and independence of the judiciary; fair trial and detainees' rights; torture, ill-treatment and police misconduct; conditions in prisons and detention facilities; right to privacy; religious intolerance; ethnicity; death penalty; women's rights; human rights defenders.



*Yura Zavadski with photo of his father, dissident and journalist Dzmitry Zavadski, who disappeared on 7 July 1999.*  
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The human rights situation in Belarus remained a great concern. There were a few positive trends, such as the introduction of human rights courses in comprehensive schools and in higher educational institutions, as well as legislation regulating the functioning of the State.

The Independent Institute of Social, Economic and Political Researches reported that a growing number of citizens favoured democratic values, and during the presidential elections over 14,000 citizens were involved in election observation, some of whom had never participated in political or civil activities before.

However, the factors undermining the rule of law, democracy and due respect for human rights totally outweighed the positive trends. The State continued to hold a tight grip on all the main sectors of society.

In an unfair and unjust election process, which did not offer the citizens any true freedom of choice, authoritarian-minded President Lukashenka secured a new term in office.

The President continued to issue decrees and edicts with the force of law. As in previous years, Russian was forcefully promoted at the cost of the Belarussian language, with Belarussian-speakers being discriminated against in all state structures. The Government also continued to foster close ties to Russia, on the basis of the integration agreement signed in 2000, and to back up the branch of the Russian Orthodox Church in Belarus.

Throughout the year the authorities obstructed political opposition, independent media and other organisations voicing criticism of the regime. The obstruction reached its peak during the presidential elections. As a part of the campaign against "inconvenient" dissidence, mail was opened, telephones bugged, and intimate information revealed with the purpose of discrediting and humiliating the victims.

Minority religious communities and NGOs were ousted from their premises or outlawed, and peaceful demonstrators as well as uninvolved passers-by were arbitrarily detained. Corruption within the state structure also increased. The executive branch continued to exercise strong influence on the overloaded and understaffed judicial system. Due process standards were egregiously violated while the courts failed to provide any effective avenues for

citizens to obtain remedy for injustices caused by authorities.

There were numerous reports of police officers allegedly resorting to ill-treatment and torture of detainees while prison conditions were not only unsanitary but also life-threatening. The death penalty remained in use. Women saw their opportunities curtailed by traditional attitudes, both in the home and in professional life, while domestic violence remained a grave problem.

## Elections<sup>2</sup>

### *The Election Process*

On 9 September presidential elections took place. The election process was marred by gross violations of both national legislation and international standards, and could not be considered to be free and fair.

The Central Election Commission (CEC) and regional and local election commissions were formed in a non-transparent and non-democratic manner. By excluding representatives of the opposition from the election commissions, the authorities secured full control over the election process. The registration of candidates was also fraudulent. While signatures for the incumbent President were collected through the governmental structures, three opposition candidates were prevented from running, although they claimed that they had submitted a sufficient number of signatures.

The opposition candidates who were allowed to run could not conduct their campaigns on anything close to equal terms with the incumbent President. The state apparatus was effectively used to back the re-election of President Lukashenka and the state-owned mass media openly favoured the incumbent President and discredited his opponents. Meanwhile campaign events organised by the opposition candidates were interrupted, sometimes in a violent manner, and independent media was subjected to both censorship and harassment.

◆ A few days before the elections a special edition of the state-owned *Sovetskaya Belorussia* was distributed free of charge to all households in the country. The issue featured a pre-election programme written by President Lukashenka, next to the editorial, as well as an anonymous article called "Operation 'White Stork'", which denounced the activities of the political opposition in general and the presidential candidate Vladimir Goncharik (the Unified Opposition) in particular.

As a consequence of the total domination of the Presidential Administration during the pre-election campaign, voters were not given a clear picture of the choices before them. The early voting, which was organised during five consecutive days before the day of elections, was poorly controlled. The number of persons casting their votes during the early voting was also questionably high. In addition, there were reports indicating irregularities in the vote and the count of vote on the day of elections. Taken together, these circumstances deprived the results of credibility.

According to the official results, published by the CEC, the voter turnout was 83.9%. The incumbent President scored 75.7% of the votes, while the opposition candidates Vladimir Goncharik and Sergey Gaidukevich (the Liberal Democratic Party) received 15.7% and 2.5% respectively. Polls indicated that only 13% of the population considered the results trustworthy.

Prior to the elections the Belarusian Helsinki Committee (BHC) prepared proposals on amendments of the electoral legislation aimed at securing conditions of free and fair elections, and submitted them for distribution among the deputies in the Parliament. However, the documents were not handed out. Following the elections the BHC filed a complaint with the CEC, requesting the results to be invalidated due to the serious shortcomings of the election process.<sup>3</sup>

### *Domestic Election Monitoring*

The BHC monitored the presidential elections within an umbrella group of NGOs, "The Civic Initiative - Independent Observers". The attitude of the authorities toward this group, which mobilised more than 10, 000 observers, was pronouncedly hostile.

On the day of the elections, the observers experienced great difficulties in gaining access to polling stations. They were, for example, requested to show documentation not foreseen in the election legislation and expelled from polling stations if they were not able to produce it. The election observers were also prevented from overseeing the issuance of ballot sheets and the vote count.

Moreover, on 9 September, telephone connections were cut off in offices co-ordinating the civil observation initiative as well as in the homes of its regional co-ordinators. The Internet sites of the co-ordination council of the independent umbrella group were inaccessible between the evening of 8 September and the morning of 10 September.

Before, during and after the elections, election observers also faced harassment. They were intimidated, and subjected to threats and physical violence.

- ◆ Some election observers received telephone calls from anonymous persons, who threatened to "give short shrift to their wives and children" unless they gave up their work within the independent observation initiative.

- ◆ On 5 September, Lyudmila Guscha was fired from her position as a teacher of foreign languages at the Klichev Agrarian and Technical College, in the oblast of Klichev, for her involvement in election observation.

- ◆ A criminal investigation was launched against Petr Migurski, election co-ordinator in the rayon of Shklov. He was accused of

having involved people in monitoring activities without official approval. However, the case was closed due to lack of evidence.

- ◆ Gennady Martynov, reporter with the Mogilev Radio in the oblast of Mogilev, was dismissed from work due to his participation in the independent observation initiative.

### **Freedom of Expression**

The whereabouts of the opposition leaders Yury Zakhарanka, Viktor Hanchar, and Anatol' Krasouski as well as the journalist Dzmitry Zavadski, who all had disappeared under dubious circumstances in previous years, were still unknown. The authorities did not make public the results of their investigations into the disappearances. However, it was believed that secret squads, commissioned by the Government, had been involved in them. Such beliefs were confirmed by *inter alia* Aleh Alkajev, former head of the central pre-detention centre in Minsk; Mikalai Lapatik, former Deputy Minister of Interior; and Genadz Ugljanitsa, Aleh Sluchak, Dzmitry Petrushevich and Andrei Zharnasek, all former KGB officers who had left Belarus and sought asylum abroad.

Political opponents and representatives of the civil society were often denied access to state-run media and had their articles censored and their remarks distorted. Critics of the Lukashenka regime also continued to face intimidation and harassment.

- ◆ On 20 December, Andrei Zajitsev, an activist of the opposition youth movement "Zubr", committed suicide. Shortly before that he had told the BHC that he had been subjected to pressure and intimidation by KGB officers in his home city Homel. The KGB officers had attempted to coerce him to supply them with information on the activities of various opposition groups in the city. Mr Zajitsev's mother was convinced that the intimidation exercised by the KGB officers had prompted her son's suicide.

◆ In the evening of 8 September, the day before the presidential elections, the web sites of the independent press agency BelaPAN, a number of independent newspapers (*The Belarusian Business Newspaper*, *Nasha Svoboda*, *The Belarusian Newspaper*), the independent radio channel "Freedom", a number of NGOs (the BHC, Ratsyja, Charter '97), as well as the presidential candidate Vladimir Goncharik were not accessible. There were also problems with sending and receiving e-mails to these hosts. Only in the morning of 10 September did the systems function properly again. On 9 September, phone lines were cut off to regional branches of the BHC and to the election headquarters of Vladimir Goncharik.

### Freedom of Media

The situation in terms of freedom of the media continued to deteriorate. During the last few years the number of violations registered by human rights defenders in this field have steadily increased. According to the BHC, 40 violations of the Law "On the Press and Other Mass Media" took place in 1999, while the corresponding figures for 2000 and 2001 were 56 and 72 respectively.

The range of violations in 2001 was broad and included *inter alia* refusals to register media outlets and their closures, financial pressure against editorial boards, legal proceedings against journalists (including for libel), unmotivated seizures of newspapers, refusals to grant independent journalists information and to accredit foreign correspondents, threats and violence against journalists, and burglaries into offices of media outlets. The brunt of violations was registered during the presidential election campaign, but violations occurred throughout the year.

◆ 16 January, Valery Shukin, a journalist and human rights defender, was arrested when he attempted to attend a press con-

ference that was organised by the Minister of Interior and that dealt with the disappearances of opposition leaders. Previously he had been denied accreditation to the press conference, although it had been announced in the state-run media in advance. During his arrest, Mr Shukin sustained injury to one of his feet from glass splinters of a door which broke after he was allegedly provoked by police officers. Following the incident Mr Shukin was sentenced to three months of imprisonment.

◆ The International Centre against Censorship had scheduled to hold a presentation of its annual report on 21 June in Minsk. However, London representatives of the organisation were denied entrance visas. The Foreign Ministry gave no comments on the case.

### Freedom of Association

The situation regarding the independence of civil society groups grew worse, as NGOs came under increasing pressure from the authorities.

Two principal methods were used to restrict civil society activities. Firstly, provisions on registration and re-registration were invoked against independent NGOs. For purely formal reasons, such as failure to stamp or fill out an official document correctly, NGOs were threatened with closure. According to the legislation in force, an NGO could be closed down if it received two warnings from the authorities within a year.

Secondly, pseudo-NGOs were established within the state structures. These organisations rather implemented state policies than advocated the interests of the segments of the population they were supposed to represent. For example, during the year a so-called National Association of Factory Workers was formed, while the activities of independent trade unions were curtailed. Likewise a so-called Patriotic Union of the Youth was set up, while mem-

bers of independent youth movements, such as Malady Front, Maladaja Hramada and Zubr, were harassed.

A presidential decree of 12 March introduced new regulations regarding financial support from abroad. According to the decree, an NGO did not need to obtain permission before accepting foreign aid. However, the decree blatantly prohibited the use of foreign funding for preparing and organising meetings, demonstrations, pickets and strikes, and thus seriously infringed upon the principle of freedom of association and assembly.

The year also saw several cases where NGOs were arbitrarily evicted from their premises.

◆ In December a number of NGOs were evicted from the Brest State University, including the youth club "A Lot!", the handball club "The Rubicon", and the Ukrainian scientific and pedagogical union Bereginja. All of the NGOs received a notice saying that the university no longer could afford to maintain premises and a legal address for them.

### **Judicial System and Independence of the Judiciary**

The judicial system was highly dependent on the executive branch. The executive continued to decide about appointments and dismissals of judges. Judges were poorly paid, and they did not enjoy a prestigious social status. While a poll indicated that 60% of the judges would like to change their job, it was very difficult to find persons to fill vacant positions, and many of them remained unoccupied. This situation contributed to undermining professionalism within the judicial system.

### **Fair Trial and Detainees' Rights**

Arbitrary arrests were frequently carried out; persons were arrested for just about any reason and later charged with some offence that served to justify the arrest. Those

arrested were also often subjected to abuse. Prosecutors and courts typically backed up the police actions.

Trials seriously violated international standards. Falsified evidence and confessions extracted by coercive means were readily accepted, while suspects were denied an effective defence. The practice of presuming suspects to be guilty also prevailed. Closed trials were held on dubious grounds, including an unreasonably broad definition of state secrets.

In particular, the features of cases involving prominent public figures gave rise for concern. A special commission was entrusted with examining these cases before they were taken up in court. The commission was composed of the heads of the Ministry of Interior, the KGB, the Prosecutor's Office, the Supreme Court and the Supreme Economic Court and reported to the President. The commission's activities were not transparent. Formally, courts did not cite the commission's or any authority's opinions when handing down a verdict. However verdicts on prominent cases usually followed previous statements of high state officials. At the same time, well-substantiated arguments of the defence were not taken into consideration.

Private persons often refrained from bringing legal cases to court due to high fees. For example, a person who wanted to file a complaint against the actions undertaken by a state official was requested to pay a fee equivalent to half the average monthly salary in the country. The fee also increased proportionally with every claim that a complaint consisted of.

Public confidence in the legal system remained low. During the year, over 5,000 persons complained to the Presidential Administration about investigations carried out and judgements issued

◆ In January, a police patrol stopped Viachaslau Arkunou, a resident of the city of Minsk, and requested to see his identity documents. When the policemen, who did

not identify themselves, learnt that he was a journalist, they began mocking him for his profession. They also handcuffed and beat him. Afterward, the policemen took him to the nearest police station, where they accused him of resistance to the police and made him sign a protocol declaring his guilt. When the case was examined in court, the judge ordered Mr Arkunou to pay fines. Mr Arkunou refused to do so, and together with his legal counsel Andrei Atamanchuk, a BHC jurist, he filed a complaint with the Pervomajski Prosecutor's Office, which declared the actions taken by the police officers in the case as lawful. As of this writing Mr Arkunou's appeal to this response was yet to be examined.

◆ In April, Sergei Shutiajeu, a retired officer in the city of Hrodna, called the police because he was disturbed by the noise some teenagers were making in the hallway outside his apartment. However, when the police arrived to the place they detained Mr Shutiajeu. He was taken to the district police department, where he was tortured until he agreed to sign a protocol declaring his guilt of resistance to the police. Following this, Mr Shutiajeu had to spend two days without food in a temporary custody centre. His relatives were not informed about his whereabouts. When the case was taken up in court, Mr Shutiajeu was fined a sum equivalent to the national monthly salary.

◆ On 22 April, Tatsiana Ratsina, a resident of the city of Orsha, approached a woman who was standing near a currency exchange office to ask her about the USD rate. The woman turned out to be a police inspector, who interpreted Ms Ratsina's harmless question as molesting. When the case was taken up in court the judge fully disregarded Ms Ratsina's arguments and ordered her to pay 199,500 roubles (approximately 137 Euro) in fines. As of this writing the Prosecutor's Office was yet to respond to a complaint filed by Ms Ratsina.

### **Torture, Ill-treatment and Police Misconduct**

Torture and ill-treatment undertaken by police officers, both uniformed and plain clothed, remained a grave problem. The majority of the victims were opponents of the regime, including citizens who peacefully protested the incorporation of Belarus into Russia, using outlawed national symbols. However, also in many other cases police officers resorted to physical abuse.

◆ On 29 March, Ihar Tokarau, a resident of the city of Babruisk, was called to a local police station as a witness in a case where a number of police officers allegedly tortured Aleksei Dushkou, a friend of Mr Tokarau. On his way home after his testimony, Mr Tokarau met three men, two of whom wore police uniforms, who beat him. The next day he was beaten again by other men so badly that he lost consciousness. When he regained consciousness he found himself in a car with a gun in his hand and was told by police officers that he would face legal charges unless he withdrew his testimonies in the case involving Mr Dushkou. However, Mr Tokarau said he would not do that, and as a result he was beaten again. As of this writing the Prosecutor's Office was still investigating the complaint filed by Mr Tokarau.

◆ On 11 April, Ivan Lapitski, a resident of the city of Hrodna, was arrested for allegedly being drunk and using offensive language in public. He was taken to a local police station, where he was beaten until he fainted. Due to his injuries he had to be taken to hospital, and operated on for a testicle rupture. Following the incident, Mr Lapitski filed a complaint with a local Prosecutor's Office. However, the office rejected his complaint by stating that it could not be confirmed that he had been injured due to police violence. Lapitski was an observer during the October 2000 parliamentary elections after which he was arbitrarily detained on several occasions on the same

charges and finally confined to a rehabilitation centre. Local human rights monitors said, however, that Mr Lapitski had never had problems with alcohol.

### Conditions in Prisons and Detention Facilities

Prison, pre-detention and temporary custody facilities were overcrowded, and conditions in them were humiliating and endangered the lives of the detainees. Typically the space per detainee was less than 1 m<sup>2</sup>, and the cells were dirty, dusty and rarely ventilated. The detainees were not given enough food, were not able to care for their hygiene properly and did not always receive the medical care or medicines they were in need of, including cases where they suffered from tuberculosis or AIDS.

Those accused of violating internal rules of a facility were placed in special disciplinary cells, where conditions were particularly harsh, for example due to low temperatures and concrete floors covered with water. Detainees were also subjected to physical abuse. In some penitentiaries special police troops were allowed to practice hand-to-hand combat on prisoners. There were also instances when detainees were forced to work without pay, e.g. by helping to construct houses for police officers. Complaints filed by detainees were regularly censored.

◆ In February, Yury Kapachiou (born in 1977) died from pulmonary tuberculosis, which he had contracted as a prisoner of the confinement institution UZ-15/8. Following his death his mother, Natalia Kapachiova, filed a complaint with the Committee on Execution of Punishments, subordinated to the Ministry of Interior, regarding the ill-treatment her son had suffered during his detention. Mr Kapachiou had been sentenced to eight years of imprisonment and held in UZ-15/8 since 1997. In the spring of 1999 he was diagnosed with pulmonary tuberculosis, after

which he was twice treated in the tuberculosis hospital of the prison. However, although his health rapidly deteriorated he was still held in the prison until July 2000, when he was finally released. At the time of his release he was so weak that he could not walk without support. The legal proceedings that followed upon Ms Kapachiova's complaint were closed to the public, as the case was considered to involve classified materials, amounting to government prescriptions regarding treatment of prisoners. In October the case was closed, as the court could not find any reason to hold the prison authorities responsible for the fate of Mr Kapachiou. With the help of the BHC Ms Kapachiova appealed against this decision.

◆ On 6 January, a riot took place in the Education and Labour Colony for Minors in the city of Vitsebsk. The riot followed after more than 200 of the young inmates had been placed in disciplinary cells for smoking. In addition to the release of their fellow inmates from the disciplinary cells, the rioters demanded personnel changes in the prison administration, an end to the practice of column marching and free access to the colony for mass media. The riot was quashed by special police forces by means of the use of tear-gas and rubber truncheons. Later on the rioters were moved to different colonies, while legal cases were brought against the initiators of the riot. In January 2002 the hearings in the case began. Already in the beginning of them, several testimonies were given about ill-treatment and torture of young inmates by members of the colony administration. The minors accused of having organized the riot reported that they had been subjected to torture and humiliating treatment. On 22 January 2002, two of the accused - Dzmitry Naboikin and Aleksandr Semchanka - were beaten in pre-detention centre, which was certified by a physician. The judge immediately initiated investigation into the alleged abuse.

## Religious Intolerance

Although the Constitution provided for equality of all religious communities in the country, the Government openly supported the Belarus Exarchate of the Russian Orthodox Church. In flagrant violation of Article 7 of the Law “On Freedom of Confessions and Religious Organisations”, which established that the State does not finance the activities of religious communities, the Exarchate received funding from the state budget.

Meanwhile minority religious communities faced strong pressure from the authorities. In particular, it was worrisome that the KGB was engaged in monitoring religious organisations. On the basis of the monitoring, the KGB submitted reports to the Expert Council of the State Committee on Religions and Nationalities, which made decisions on the legality of churches. The KGB also initiated articles discrediting minority confessions in state-run newspapers.

- ◆ In the city of Orsha, in the Vitsebsk region, the local executive committee revoked a leasing contract with the religious organisation “Light of Life”, which was officially registered. Soon after the parish had been forced to leave its premises, these were handed over to a regional branch of the Belarusian Exarchate of the Orthodox Church. The “Light of Life” was unable to purchase or rent new premises.

- ◆ In the city of Brest, Aleksandr Baran, a pastor of the Christian church “Will of Jesus”, was fined for violating legislation regarding the organisation of meetings. During trial he explained that he had repeatedly requested the local executive committee for permission to hold a special service, in which over 500 persons were supposed to take part, in the facilities of the church. However, as his request was rejected without giving any reasons, he decided to rent larger premises for the event without permission. He also informed the

authorities about this. After holding a service in the hall, he was charged with violating the regulations on meetings and services.

## Right to Privacy

In line with international standards the legislation of the country ensured the right to privacy - in relation to both private actors and authorities. However, in practice this right was severely violated.

As one method in the struggle against political opposition the authorities disclosed personal information of opponents to the public sphere. Law enforcement officials abused Article 16 of the Police Law to enter private homes and other premises. Private newspapers, opposition parties, and NGOs, including the BHC, often received mail in envelopes that already had been opened; the state post claimed it happened due to “technical reasons”. Leaders of opposition political parties and organisations were convinced that their phones were wiretapped.

- ◆ On 25 June, a number of police officers attempted to force their way into the apartment of Siargei Nerovny, a journalist and editor-in-chief of the independent newspaper *Volny Gorad* in the city of Krychau, in the Mahileu region. The police officers refused to explain the reason for their visit. Later it turned out that they had requested a search warrant from the prosecutor but had not been granted one. On 27 June, the police officers returned, disconnected electricity and cut the phone wires to the apartment, and started breaking into it. They left only after BHC representatives arrived to the spot. The police officers did not face any repercussions for their behaviour.

- ◆ In November, the state-owned TV-channel Salihorsk showed a series of programmes called: “Kids, don’t go for a walk with the BHC”. In the programmes infor-



mation of intimate character were revealed about Leanid Markhotka, chair of the regional branch of the BHC, who had not approved its disclosure. Mr Markhotka demanded that a criminal case be opened against the TV-channel.

### Ethnicity

Belarus is a multi-ethnic state with over 100 ethnic groups. The largest groups are: Belarussians (over 80%), Russians, Poles, and Ukrainians. Although 74% of the residents state Belarussian as their mother tongue, only 37% say that they normally speak Belarussian in every day life, while the corresponding figure for Russian is 63%, according to a census in 2000.

Russian continued to dominate within the state administration, the judiciary, the educational system and the army. Belarussian-speakers faced discrimination, and were strongly underrepresented within the state apparatus. A majority of all schools already used Russian as their language of instruction, and in 2000-2001 the situation deteriorated further, as 25 Belarussian schools were closed down, while 54 new Russian schools were opened. The BHC concluded that the title nation of the republic had been ascribed a *de facto* minority status.

During 2001, several official agreements were made aimed at the integration of Belarus with Russia. In early 2002, the Union budgets were discussed.

### Death Penalty

During the year seven persons were sentenced to death and two of them were executed. The total number of executions in 2001 was unknown, however, none of those on death row were pardoned.

◆ In early 2001, the executions of Sergei Zababurin, Ihar Liashkevich and Anton Bandarenka were carried out. Shortly before this the BHC had turned to the UN Human Rights Committee in the case, ex-

pressing concern over serious violations of due process standards in the legal proceedings against the three men. The Committee responded by appealing to the Government to put the executions on hold. However, this appeal was ignored.

### Women's Rights

The labour job market remained segmented along gender lines. In particular, women were over-represented in the sectors of health and social care (83% of the employees) and education (80% of the employees) but under-represented in leading positions. For example, although women clearly dominated within the education sector as a whole, only 48% of all principals of primary schools and two of the 42 heads of higher education institutions were female. Only one of the ministers in the Government was a woman, and no local executive committees had female chairs.

Traditional gender roles prevailed within the family. The birth rates continued to fall, with one major reason being that the support granted to parents on leave to care for their new-borns was minimal.

Domestic violence was a problem. According to studies, psychological violence took place in 52% of all families, and physical violence in 6% of all families. In most cases women were the victims. Studies also indicated that 59% of the women serving sentences for murders in the Homel prison were former victims of domestic violence.

The Ministry of Interior reported that 148 criminal cases related to trafficking, procuring and organized prostitution involving women were initiated during the year. In border regions abduction of teenage-girls, who were taken abroad for the purpose of prostitution, was a widespread problem.

A special centre for gender information functioned within the Ministry of Social

Security. A national plan on the promotion of gender equality was adopted for the period of 2001-2005, and in one of its main provisions this document foresees the drafting of legislation on equal opportunities in 2002.

### **Human Rights Defenders<sup>4</sup>**

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### **Endnotes**

- <sup>1</sup> Unless otherwise noted based on Belarusian Helsinki Committee (BHC), *Annual Report 2001*.
- <sup>2</sup> For more information on this topic see BHC, *Results from the Independent Election Observation of the Belarusian Presidential Elections*, at <http://bhc.unibel.by>
- <sup>3</sup> See IHF and BHC, Joint Statement, "Facts Show That Presidential Election Results Must Be Invalidated, Belarusian Helsinki Committee Files Complaint to the Central Election Commission," 10 September 2001, at [www.ihf-hr.org/appeals/010910.htm](http://www.ihf-hr.org/appeals/010910.htm)
- <sup>4</sup> See Freedom of Expression and Right to Privacy.