

POLITICAL REPRESSION PRECEDING THE JUNE 7, 2026 NATIONAL ASSEMBLY ELECTIONS IN ARMENIA AND ITS IMPACT ON CITIZENS' RIGHT TO FREE EXPRESSION OF WILL

(Fact-Finding and Analytical Report)

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Executive Summary

This report examines the pre-election environment preceding the June 7, 2026 parliamentary elections in Armenia and assesses whether the cumulative pattern of political pressure, hostile rhetoric, selective law-enforcement action, and restrictions on critical voices may have affected citizens' right to freely form and express their political will.

The report argues that the election should not be assessed solely through the technical administration of voting day. In line with international democratic standards, elections must also be evaluated in light of the broader pre-election environment, including the protection of fundamental rights, the absence of intimidation, equal conditions for political competition, and the existence of media pluralism.

According to the report, the period preceding the elections was marked by a pattern of pressure against opposition political figures, public institutions enjoying broad public trust, journalists, academics, clergy, and ordinary citizens. These developments included criminal prosecutions against major opposition actors and their associates, repeated use of public rhetoric that appeared to undermine the presumption of innocence, pressure on media outlets and critical journalists, hostile and degrading language directed at Armenians from Artsakh and government critics, and the use of legal or administrative tools in ways perceived as selective or politically motivated.

The report also highlights pressure directed at the Armenian Apostolic Church, continued restrictions affecting opposition-led local self-government bodies, and public statements by senior officials that may have contributed to fear, self-censorship, and political stigmatization. Taken together, these developments are presented as evidence not of isolated irregularities, but of a broader systemic environment that may have had a chilling effect on political participation and public debate.

Drawing on OSCE/ODIHR standards, the Venice Commission's guidance, the UN Human Rights Committee's General Comment No. 25, and relevant case law of the European Court of Human Rights, the report argues that democratic elections

require not only properly conducted voting procedures, but also a political environment in which citizens and public actors can participate freely, without fear of retaliation, humiliation, criminalization, or exclusion.

The report concludes that the broad climate of fear and intimidation described above, together with mass arrests on vague or insufficiently substantiated grounds and the perceived selective use of state power, may have significantly affected the free expression of voters' will. On that basis, it argues that these developments call into question both the credibility of the results of the June 7, 2026 elections and the overall legality of the electoral process.

INTRODUCTION

This report seeks to provide a legal and political assessment of the verbal and non-verbal acts of repression recorded during the period preceding the June 7, 2026 elections to the National Assembly of the Republic of Armenia, as well as of the broader atmosphere they helped create in the country. By their nature and scale, these developments may have affected citizens' ability to freely form and express their political will. The report does not address all aspects of the electoral process or the technical administration of election day. Rather, it focuses on the pre-election environment as an essential component of free and fair elections.

During the eight years of rule by the Civil Contract party, which came to power in 2018 through the "Non-Violent Velvet Revolution" with broad public support, Armenia's domestic political climate has been marked by deep polarization, attempts to divide society into "blacks" and "whites," growing intolerance toward critics of the authorities, large-scale arrests, restrictions on the entry of diaspora Armenian figures into Armenia, recurring concerns about the political neutrality of state institutions, law-enforcement bodies, and the national security system, pressure on the media through judicial mechanisms, physical violence against journalists, political pressure on the Armenian Apostolic Church and criminal proceedings against clergy, as well as the spread of hostile rhetoric in political and public discourse. In the months immediately preceding the 2026 parliamentary elections, actions were taken against political opponents, influential public figures and institutions, journalists, clergy, and ordinary citizens that were widely perceived as attempts at intimidation, silencing, discrediting, or restricting political participation, while also fueling intolerance, hostility, and hatred toward various groups in society.

The cases presented in this report are assessed not as isolated incidents, but in their cumulative and interconnected context. The central question is whether the atmosphere of fear, hostility, and possible reprisal that developed during the pre-election period may have had a substantial impact on the formation and expression of voters' free will. In other

words, could the rhetoric used by representatives of the authorities, the concerns raised over the selective use of legal and administrative tools, and the disproportionate responses to dissent have restricted the effective exercise of the right to free elections guaranteed by the Constitution of the Republic of Armenia and the Electoral Code?

This report does not seek to replace the legal assessments of competent authorities or the courts. At the same time, the cumulative analysis of the facts presented allows an assessment of whether the events recorded during the pre-election period were sufficient to produce a “chilling effect” on voter behavior, discourage political participation, and reduce public confidence in the election results. If voters form and express their political preferences not on the basis of free choice, but under conditions of fear, stigmatization, public humiliation, or possible punishment, then not only the competitive character of the electoral process, but also the democratic legitimacy of power formed through elections, comes into question.

The report consists of nine interrelated sections presenting and analyzing the principal manifestations of verbal and non-verbal repression recorded in the period preceding the June 7, 2026 National Assembly elections. In particular, it examines the first broad wave of pressure aimed at preventing the emergence of a new political force; efforts to discredit the “Sacred Struggle” movement and its supporters; criminal prosecution and property-right concerns involving key opposition political figures Samvel Karapetyan, Gagik Tsarukyan, and Robert Kocharyan; the persecution of representatives of the political forces they lead; restrictions on freedom of speech and the press; cases of pressure against citizens; the creation of an atmosphere of hate speech and hostility, in particular toward Armenians from Artsakh; manifestations of hybrid warfare aimed at portraying Armenia’s partner and friendly states as enemies and blaming them for Armenia’s own mistakes, while softening the aggressive rhetoric of actual enemies; demonization and “witch hunts”; threats of dispossession; and politically motivated pressure on the Armenian Apostolic Church. A separate section addresses pressure exerted by the central authorities on local self-government bodies in cases where they were led by opposition forces. The final sections assess the facts presented in light of international democratic standards, as well as the principles of free elections and free expression of will enshrined in the Constitution of the Republic of Armenia and the Electoral Code, with a view to determining whether their cumulative effect may have significantly influenced citizens’ political behavior, public trust in the electoral process, and the credibility of the June 7, 2026 election results.

GEOPOLITICAL CONTEXT

The 2026 parliamentary elections took place amid regional and international tensions, with Armenia positioned at the intersection of competing geopolitical interests. Following the 2020 war, the loss of Nagorno-Karabakh, and the forced displacement of its Armenian

population, competing agendas emerged concerning Armenia's foreign policy orientation, security architecture, and regional communications.

On the one hand, Western actors — particularly the European Union and the United States — have in recent years increased their engagement in Armenia, outwardly supporting “democratic reforms, institutional strengthening, and regional stability,” while, according to the authors, turning a blind eye to serious abuses by the authorities, including misuse and waste of public resources. The Armenian authorities, for their part, have publicly spoken about closer alignment with the European Union and the possibility of leaving the EAEU and CSTO frameworks, while also blaming those structures for their own political failures. Against a backdrop of growing domestic tensions, several European leaders who arrived in Yerevan on May 4, 2026 to attend the 8th summit of the European Political Community and the first Armenia-EU summit publicly expressed support for Prime Minister Nikol Pashinyan's candidacy. U.S. President Donald Trump also publicly voiced support for Pashinyan. The report characterizes these steps as interference in a process central to Armenia's sovereignty.

On the other hand, Russia, long regarded as Armenia's principal strategic partner and a central pillar of its security system, continues to seek to preserve its influence in the South Caucasus, which it regards as an area of vital interest. Although the Russian leadership did not directly endorse any candidate, it publicly argued that Armenia remains economically tied to Russia and that rapprochement with the EU is incompatible with continued membership in the EAEU and CSTO, suggesting that Armenia should carefully consider whether distancing itself from Russia is in its interest.

Iran has likewise repeatedly stated that changes in the regional balance of power in the South Caucasus — particularly attempts to redraw borders or expand the military presence of extra-regional actors — are contrary to its national security interests.

At the same time, Turkey and Azerbaijan continue to promote their own vision of regional connectivity and economic integration, including transport links through Armenian territory. These initiatives have generated sharply divergent assessments within Armenian political and expert circles. In public discourse, they have been presented both as an opportunity for regional cooperation and as a potential threat to Armenia's sovereignty and security. During the election period, Turkey and Azerbaijan openly signaled support for the incumbent prime minister and the ruling force.

Armenia's domestic political developments, including the electoral process, therefore unfolded not only in the context of internal political competition, but also amid a complex interaction of external interests. In this setting, the ruling party — while taking care to obscure its underlying objectives — appeared, in the authors' view, to favor a Western geopolitical orientation supported by Turkey and Azerbaijan. As one example of this

orientation, the report cites National Assembly Speaker Alen Simonyan's statement that "Azerbaijan is our guarantor of security."

According to the authors, in seeking rapprochement with a state that has not renounced hostile rhetoric and conduct, the authorities are prepared to sacrifice the issue of the Armenian Genocide, remove Mount Ararat from passports and the state seal, distort the history taught in schools, and amend the Constitution in response to Azerbaijani demands.

The principal opposition forces oppose this agenda. They advocate a more balanced foreign policy and reject damaging Armenia's relations with its natural allies, Russia and Iran. According to the report, the campaign against them must also be understood in this geopolitical context.

Although this report does not seek to assess the actual scale of external influence or attribute direct responsibility to foreign actors for the developments described, this geopolitical environment is important for understanding the highly polarized political atmosphere in which pre-election processes and public perceptions took shape.

THE ARMENIAN DIASPORA IN THE GEOPOLITICAL CONTEXT

After coming to power, Nikol Pashinyan gradually reduced the Diaspora's role in Armenian public affairs, beginning with the abolition of the Ministry of Diaspora. Representatives of major Diaspora institutions have described the Office of the High Commissioner for Diaspora Affairs, created in its place, as highly ineffective. According to press reports, Diaspora communities often learn about the Commissioner's visits only after he has left. Procedures for obtaining Armenian citizenship have also been tightened for ethnic Armenians.

Since 2022, several high-profile Diaspora figures and public activists have effectively been denied entry into the Republic of Armenia. Among them were Murad Papazian, Co-Chair of the Coordinating Council of Armenian Organizations in France; Masis Abrahamian, head of the ARF in the Netherlands; Diaspora activist Syune Abrahamian; and French-Armenian journalist Leo Nicolian. Notably, the Yerevan Administrative Court later overturned the entry bans imposed on Papazian and Abrahamian, casting doubt on the legality of those measures. In some Diaspora circles, these incidents were seen as selective restrictions targeting Diaspora Armenians critical of the authorities.

The campaign against the Armenian Apostolic Church, described below, also appears to have been partly aimed at weakening ties with the Diaspora.

AUTHORS' NOTE AND METHODOLOGICAL CLARIFICATION

This alternative report was prepared by Mariam Chakhoyan, head of the “Tukhmanuk” NGO and a lawyer, and political scientist Maya Barkhudaryan.

The report is based on open sources, media publications, official statements, court decisions, international documents, and other information available to the authors. It does not claim to provide an exhaustive account of all incidents recorded before and after the June 7, 2026 National Assembly elections. Rather, it seeks to identify the most characteristic and publicly significant developments, situate them within their broader political and legal context, and provide a legal and political assessment in light of international and domestic standards relating to human rights, democracy, and free elections.

The assessments expressed in the report reflect the authors’ professional analysis and are not intended to replace the factual findings or judicial conclusions of competent authorities.

Given that political developments in the Republic of Armenia remain ongoing and that new events continue almost daily to shape the domestic political situation and deepen crisis trends, this report should be understood as a summary of the situation as of June 18, 2026 and may be subject to further supplementation and updating.

(1) THE FIRST WAVE OF REPRESSION: PREVENTING THE FORMATION OF A NEW POLITICAL FORCE — “SACRED STRUGGLE”

As early as 2025, the authorities initiated criminal proceedings against Archbishop Bagrat Galstanyan, Primate of the Tavush Diocese and leader of the “Sacred Struggle” movement, as well as against 17 active citizens associated with the movement, accusing them of preparing acts of terrorism and the usurpation of power. The movement had emerged in spring 2024 from protests in Tavush against the border delimitation process and later developed into a broad public movement demanding the resignation of Prime Minister Nikol Pashinyan. It brought together clergy, public figures, former military personnel, professionals from various fields, political forces, and politically unaffiliated citizens.

Within the framework of the criminal case, 17 of the 18 defendants were placed in pre-trial detention. The charges were based on operational intelligence and wiretaps presented by law-enforcement bodies concerning alleged preparations for terrorist acts. The defense challenged both the credibility and evidentiary value of this material. Defense lawyers and several independent legal experts pointed to the abstract nature of the accusations, the lack of any concrete evidence of actual violent acts or preparations for such acts, and serious questions regarding the necessity and proportionality of detention.

At the same time, the criminal prosecution was accompanied by public insulting and defamatory statements directed at the movement’s leader by state officials. Such

statements raise concerns regarding the presumption of innocence and appear intended to shape negative public perceptions of Archbishop Bagrat and the “Sacred Struggle” movement. In several cases, Archbishop Bagrat Galstanyan went to court to defend his honor and dignity, and the courts upheld his claims, finding that defamation had occurred.

As part of the campaign to discredit Archbishop Bagrat, the court upheld his lawsuit against former National Assembly member and Chair of the Public Council Stepan Safaryan. The court found that Safaryan had publicly attributed to the Archbishop an insulting expression that, according to the court’s findings, did not in fact belong to him. The court ordered compensation for non-pecuniary damage. It is also notable that in July 2025 Archbishop Bagrat filed lawsuits for insult and defamation against a number of other political and public figures, including Health Minister Anahit Avanesyan, Republic Party leader Aram Sargsyan, Civil Contract MP Vahagn Aleksanyan, and political scientist Harutyun Mkrtchyan. Additional lawsuits were filed against other public officials, party representatives, and media figures. These developments suggest that the serious accusations and hostile public portrayals directed at the Archbishop were not accidental, but part of a broader campaign aimed at shaping negative public opinion and circulating stigmatizing narratives in the public sphere. Some of the expressions used have already been found by courts to be defamatory.

The proceedings, referred to in public discourse as the “case of the 18 righteous,” continue to generate intense debate in the media and among civil society actors regarding the sufficiency of the factual basis of the indictment, the reliability of the evidence, and the possible political context of the prosecution. Although only an independent court can deliver a final legal assessment, the conduct of the proceedings has already raised serious concerns regarding political pluralism during the pre-election period, the freedom of opposition activity, and the possible selective use of criminal justice mechanisms. The fact that weekly court hearings have consistently drawn large numbers of attendees is seen as evidence of substantial public support for the “Sacred Struggle” movement and public disagreement with what many perceive as the unjust and dishonest conduct of the authorities.

The case of Archbishop Bagrat appears to illustrate a broader pattern in the authorities’ conduct toward key political actors, aimed at neutralizing them politically and removing them from competition.

(2) CRIMINAL PROSECUTION OF SAMVEL KARAPETYAN, THE MAIN OPPONENT OF THE AUTHORITIES IN THE 2026 NATIONAL ASSEMBLY ELECTIONS, AND ENCROACHMENTS ON PROPERTY RIGHTS

On June 18, 2025, shortly after publicly expressing support for the Armenian Apostolic Church and declaring that he would intervene “in our own way,” criminal proceedings were initiated against businessman Samvel Karapetyan, founder of the Tashir Group of Companies, and he was detained.

Prime Minister Nikol Pashinyan characterized Karapetyan’s statement — “we will protect the Church in our own way” — as a threat to national security.

At the same time, the government announced that it was beginning a process to nationalize the Electric Networks of Armenia (ENA), a company owned by Karapetyan. Karapetyan’s legal team applied to the Arbitration Institute of the Stockholm Chamber of Commerce, which ordered the Government of Armenia to refrain from steps toward seizure and nationalization of the company, recognizing such actions as unlawful.

It is significant that the full arbitral tribunal constituted in January 2026 confirmed the binding nature of the emergency arbitrator’s decision and rejected Armenia’s arguments that the emergency arbitration procedure had been unlawful. The tribunal also required the Armenian government to refrain from any further steps aimed at expropriating ENA. Nevertheless, the Armenian authorities reportedly declined to comply with the tribunal’s decision, despite its binding character.

Meanwhile, on November 17, 2025, the Public Services Regulatory Commission revoked ENA’s electricity distribution license, citing violations allegedly identified during inspections, and criminal proceedings were initiated.

The criminal and administrative actions against Samvel Karapetyan and ENA were accompanied by an active public communications campaign by representatives of the authorities, in which Karapetyan and his affiliated company were portrayed as symbols of a structure that had enriched itself at society’s expense and robbed citizens for years. Prime Minister Pashinyan stated that “there has not been a single family in Armenia from whom ENA has not stolen money,” and further suggested that the company’s activities may have been aimed at generating political discontent through the creation of an energy crisis. Civil Contract MP Vahagn Aleksanyan similarly accused ENA of “greedily looting” state and municipal institutions.

At the same time, former acting ENA Director General Davit Ghazinyan argued that individual instances of inflated billing or alleged irregularities could not automatically be attributed to the owner, and described the entire process as a political campaign aimed at discrediting Samvel Karapetyan and creating negative public perceptions of him. Rhetoric of this kind, made in the absence of any final court determination, raises concerns regarding the presumption of innocence and public neutrality.

Samvel Karapetyan spent approximately seven months in the detention facility of the National Security Service following his June 18, 2025 detention. On January 18, 2026, he was released from detention but placed under house arrest, which was subsequently extended, including during the pre-election phase of the 2026 parliamentary elections. This significantly restricted his ability to participate fully in the campaign and in post-election developments.

According to his supporters, Karapetyan entered politics under compulsion by forming the “Strong Armenia” political party, which participated in the 2026 parliamentary elections as the opposition force enjoying the highest level of public trust. Karapetyan and his political team repeatedly stated that his decision to enter politics stemmed from a refusal to remain indifferent to developments in the country and from the need, in their view, to resist political and legal pressure.

Close political associates stated that Karapetyan intended to “go all the way, with his own face and under his own name,” despite the criminal cases against him and the restrictions on his liberty. Karapetyan himself stated that, even during his detention, he had been offered more favorable conditions in exchange for withdrawing from politics, but had refused, emphasizing that he would continue to fight to the end for his vision of Armenia’s future.

These circumstances suggest that Samvel Karapetyan’s political activation was not the result of a pre-planned partisan career, but rather a response to the pressure directed against him and the political climate that had developed in the country, which, in the view of him and his supporters, required personal engagement and resistance.

The timing of criminal prosecution, political activation, and state intervention in major private property gave rise in public and professional circles to concerns regarding selective justice during the pre-election period, the protection of property rights, and the possible chilling effect on political competition.

(3) REPRESSION AGAINST POLITICAL FORCES

During the 2026 pre-election period, Prime Minister Nikol Pashinyan referred to Robert Kocharyan, Samvel Karapetyan, and Gagik Tsarukyan as a “three-headed monster,” portraying them as embodiments of the former regime, war, and corruption.

Throughout the campaign, the language used by Pashinyan and his allies was marked by mocking, harsh, and accusatory expressions that undermined the presumption of innocence of political opponents and often crossed the boundaries of acceptable political speech into outright insult. Threatening statements were also frequently voiced. In addition, opponents were accused, without evidence, of using degrading and cynical approaches toward voters. At the same time, Pashinyan portrayed himself as a bringer of

peace and a servant of the people. Members of the Civil Contract faction likewise engaged in public ridicule of their political opponents, including mocking their appearance and circulating satirical material aimed at humiliating them.

During the pre-election phase, several representatives of opposition political forces and members of their campaign teams became targets of criminal prosecution, creating the appearance of unequal conditions of political competition. Those who began to gain public support were labeled by the ruling camp and its allies as agents of foreign influence, with criminal proceedings often foreshadowed in public speeches.

In May 2026, Andranik Tevanyan, leader of the Mother Armenia party and second on the Prosperous Armenia electoral list, was arrested on charges of treason and espionage. The criminal case was initiated immediately after Prime Minister Pashinyan publicly declared at an election rally that the National Security Service would submit a report to the Investigative Committee the next day concerning proceedings for treason. Searches of the party's headquarters and Tevanyan's residence followed, along with criminal prosecution and a two-month detention order. The defense argued that the case lacked substantiated evidence and that the charges were politically motivated.

The Strong Armenia party also came under close scrutiny by law-enforcement bodies. On April 16, 2026, party members Gohar Ghumashyan and Verzhine Stepanyan were arrested in connection with an alleged vote-buying case and later placed under administrative supervision. Fourteen people were reportedly arrested in total. Party representatives argued that the process was intended to discredit them before the official start of the campaign, while the authorities framed it as part of efforts to combat electoral violations.

According to media reports, Gohar Ghumashyan had a two-month-old breastfeeding infant at the time of her arrest, yet this did not appear to have been duly considered in deciding whether to deprive her of liberty. The case was accompanied by harsh public reactions from ruling party representatives, including mocking remarks directed at a nursing mother, which were widely criticized as disrespectful and inhumane. These circumstances raised further concerns about the proportionality of preventive measures in politically sensitive cases, the protection of the best interests of the child, and the rhetoric used by public officials.

Another prominent figure from Strong Armenia, Artur Avanesyan, known as "Kandaz," a former serviceman and veteran of the Artsakh wars, was detained for two months. Alik Aleksanyan, number two on the party's electoral list, was later arrested after having reportedly recorded a video in anticipation of that possibility. Criminal proceedings were also initiated against other parliamentary candidates from the party. In the cases of Artur Abrahamyan and Hayk Avagyan, detention was ordered and they were declared wanted. Meanwhile, media reports described searches, investigative actions, and arrests targeting

campaign headquarters managers and activists of opposition forces. At a press conference, Strong Armenia member Gohar Meloyan stated that more than 780 party members had been arrested during the pre-election period, including elderly women, and argued that the mass arrests were designed to create an atmosphere of fear.

This scale of criminal and administrative pressure, including the arrest of proxies and supporters, not only created serious obstacles to the party's work but also appears to have been intended to generate negative public attitudes, mistrust, and fear among its supporters.

Repressive measures also affected the Armenia Alliance, led by Robert Kocharyan, the other major opposition force described by Pashinyan as part of the "three-headed monster." Since the change of power in 2018, Kocharyan has remained one of the main targets of the authorities' political rhetoric. He was prosecuted in connection with the March 1 case, detained several times, and later saw the main charge collapse after the Constitutional Court declared Article 300.1 of the Criminal Code unconstitutional in 2021. Even so, he continued to be portrayed as a symbol of the "old system," the danger of war, and the "three-headed monster." During the pre-election period, such rhetoric further contributed to his demonization and to public mistrust of the political force he leads.

On election day, the Armenia Alliance officially announced that from the morning onward, law-enforcement bodies had been detaining and/or arresting members and coordinators of its campaign headquarters under various pretexts, including witness questioning. Alliance representatives stated that these actions were aimed at disrupting the work of campaign headquarters and preventing their full participation in the electoral process. Later, opposition figures claimed that some individuals had been held for hours without their lawyers being allowed to participate, only to be released without charges. Although the authorities framed these actions as ordinary law-enforcement measures, their timing and coincidence with election day raise serious concerns about electoral freedom and equal political competition.

Particular concern was also caused by a public statement by Civil Contract MP Vahagn Aleksanyan implying that law-enforcement bodies had broad surveillance capabilities against political opponents, declaring in effect that "we are wiretapping all of you." Regardless of its exact intended meaning, such rhetoric contributes to fear and self-censorship among participants in political life.

Post-election retaliation: implementation of the promise to "crush you all"

After the elections, the rhetoric of the authorities continued to carry clear overtones of retaliation against opposition forces. Public statements circulated in which political opponents were threatened with punishment, accountability, or removal from political life.

Opposition circles viewed these statements as manifestations of post-election pressure and the emergence of a climate of political reprisal.

Renewed criminal prosecutions after the elections affected, among others, representatives of the political teams of Gagik Tsarukyan and Samvel Karapetyan, as well as other opposition figures. Soon after the elections, it became clear that all three leading opposition figures had been restricted from leaving the country.

Gagik Tsarukyan was reportedly informed at the airport, while preparing to travel for a short vacation with his wife, that he was prohibited from leaving Armenia. On the same day, June 9, criminal proceedings were initiated against him.

On June 12, Narek Karapetyan, the first candidate on the Strong Armenia parliamentary list, stated that he had not been allowed to cross Armenia's border. He had intended to travel to the Lars corridor to assess the situation on the ground.

On June 15, it emerged that Robert Kocharyan was likewise unable to leave the country, although the reason had not initially been explained. His legal team described the restriction as unlawful. On June 16, the Prosecutor's Office petitioned the Central Electoral Commission to lift Kocharyan's immunity in order to initiate criminal proceedings and deprive him of liberty; the CEC approved the request on June 17. According to the Armenia Alliance office, law-enforcement bodies had stated two days earlier that no new criminal case had been initiated.

The Prosecutor's Office also requested that the CEC lift the immunity of Davit Ghazinyan, a Strong Armenia parliamentary candidate, so that criminal proceedings could be brought against him. Once the CEC granted consent on June 17, Ghazinyan was immediately arrested.

These developments were perceived in public and professional circles as the realization of earlier threats and as manifestations of selective justice. Notably, the actions were preceded by public instructions from Pashinyan. During a June 11 press conference, in language marked by mockery and degradation, he stated that if Gagik Tsarukyan had ever been offered a political deal, he would have accepted it "on his knees." He also accused the opposition of obtaining "100 percent of their votes through bribery," while portraying his own votes as "100 percent organic."

He went further, threatening the judiciary by implying that it must prosecute and imprison his political opponents, warning that anyone caught in vote-buying in these elections should be in prison before the next election cycle concludes. He argued that failure to do so would mean the judicial system was acting against the state. The same evening, a candidate affiliated with Prosperous Armenia and Mother Armenia published a video

showing law-enforcement officers entering their apartment without presenting a legal basis.

While the state has a duty to investigate electoral violations and crimes against national security, the timing and selective nature of these actions, combined with the often coarse and uncivil political rhetoric accompanying them, raise serious questions about political pluralism, the independence of law-enforcement bodies, and equal conditions in the electoral process.

(4) RESTRICTIONS ON THE PRESS AND FREEDOM OF EXPRESSION, INCLUDING IN THE ACADEMIC ENVIRONMENT

The diversity of broadcast media available throughout the Republic declined significantly after H2 and Yerkir Media, both associated with the opposition, lost their terrestrial broadcasting rights in 2021–2023.

At the beginning of 2026, they were joined by Shoghakat TV, affiliated with the Armenian Apostolic Church. Shoghakat lost public broadcasting rights and ceased operating on the digital network pursuant to a December 25, 2025 government decision dissolving the “Spiritual-Cultural Public Television Company” CJSC. This decision was preceded by legislative amendments adopted on October 24, 2025 to the Law on Audiovisual Media, reducing the minimum number of public broadcasters from three to two and removing the requirement that there be a separate public broadcaster with an educational and cultural mission.

Concerns regarding reduced media pluralism also appeared in the official documents of an authoritative international election observation mission. In its interim report on the 2026 parliamentary elections, the OSCE Office for Democratic Institutions and Human Rights noted concerns about the narrowing of broadcast media pluralism. The report specifically referenced the loss of nationwide terrestrial broadcasting licenses by H2 and Yerkir Media, as well as the closure of Shoghakat following the 2025 legislative changes.

Throughout the campaign and on election day itself, News.am journalist Narek Khachatryan documented numerous alleged violations by the ruling force. The day after the election, he reportedly received notice ordering him to report for military training. His latest report had come from Sotk on election day, where he filmed hundreds of servicemen gathering at a polling station shortly before voting ended, as well as civilians entering together with the servicemen despite having no apparent authorization to be there. When Khachatryan asked why these outside individuals were present, the commission chair reportedly responded that the corridor was not part of the polling station, although the civilians remained within the polling station area during the soldiers' voting.

Shortly after the publication of his video, NEWS.am reportedly received a call from the Ministry of Defense, relaying a complaint that an officer from the Sotk polling station had claimed the journalist was interfering with the chair's work.

On June 5, two days before the National Assembly elections, the National Security Service and the Investigative Committee searched the offices of Armat Media, a news agency associated with the Strong Armenia alliance. Journalists' phones and computers were seized, the live broadcast was disrupted, and the newsroom was sealed. According to the Investigative Committee, the search was conducted in the frame of a criminal case involving alleged money laundering and material inducement on an especially large scale. The media outlet's owner, Alik Aleksanyan, a key member of Strong Armenia, had been arrested several days earlier, on June 3.

In 2025, concerns were also raised regarding the working conditions of the Aravot daily newspaper. After operating for more than three decades in the Press Building, the paper's editorial office was notified by the State Property Management Committee that it would have to vacate the premises because the lease would not be renewed. Aravot's management described the decision as selective and harmful to the functioning of an independent editorial office. Although the authorities justified the decision as an ordinary contractual matter, journalists and experts viewed it as additional pressure on independent media critical of the authorities.

On May 31, 2026, journalist and public figure Nairi Hokhikyan announced that his home had been attacked, that he had been beaten, and that an attempt had been made to break into his apartment. A criminal case was reportedly opened after the incident, and on June 2 his home was searched. The incident received broad media attention and was presented as another example of pressure on a public figure with opposition views during the pre-election period.

On June 10, Yerevan State University professor Anush Sedrakyan stated publicly that the authorities were preparing to dissolve the Department of Foreign Literature, which she headed, despite the fact that it was one of the university's oldest and most important departments. According to her, one reason was that she had participated in the elections on the list of the "Wings of Unity" party. Her case was not the only reported example of pressure on academic freedom. Months earlier, Gevorg Barseghyan, dean of YSU's Faculty of European Languages and Communication, had been dismissed because of his opposition political views. YSU lecturers Abraham Gasparyan and Menua Soghomonyan were likewise reportedly dismissed for overtly political reasons.

Abraham Gasparyan was also reportedly beaten because of his sharp criticism of the authorities and his support for the Sacred Struggle movement.

Political reprisals continued after the elections. On June 11, opposition political scientist Alen Gevondyan, who was sympathetic to the Strong Armenia party, was arrested over a Facebook post. Public criminal prosecution was initiated against both Gevondyan and Tigran Vardanyan, a member of the opposition Republican Party of Armenia, under Article 422(2) of the Criminal Code, which concerns public calls, using information or communication technologies, aimed at seizing power and violently overthrowing the constitutional order. Detention was imposed on Vardanyan as a preventive measure.

Another example of restrictions on freedom of expression concerns the criminal prosecution of Narek Samsonyan and Vazgen Saghatelyan, co-authors of the “Imnemnimi” podcast. They were arrested on March 22, 2024 and charged with hooliganism committed by a group using information or communication technologies under Article 297(2) of Armenia’s Criminal Code. Searches were conducted in their homes, and they were later detained. Lawyers and public figures argued that the real reason for the prosecution was the program’s harsh criticism of the authorities and use of satirical language, while the journalists themselves denied the charges and characterized the proceedings as politically motivated persecution and a restriction on freedom of speech.

The transformations in Armenia’s media landscape in recent years had a significant impact on the information environment surrounding the 2026 parliamentary elections. The loss of nationwide terrestrial broadcasting licenses by H2 and Yerkir Media, together with the closure of Shoghakat, reduced media pluralism in the broadcast sector. As a result, part of the electorate was deprived of access to television channels presenting alternative political and value-based perspectives at precisely the moment when the public should have had the opportunity to make an informed choice.

The OSCE Office for Democratic Institutions and Human Rights also documented these concerns in its 2026 interim report, explicitly linking the narrowing of broadcast media pluralism to the electoral context.

(5) REPRESSION AGAINST CITIZENS, THE CREATION OF AN ATMOSPHERE OF HATE BY THE AUTHORITIES, HYBRID WARFARE, AND WITCH HUNTS

In the period preceding the 2026 parliamentary elections, manifestations of political intolerance spread beyond political figures and organized opposition groups and came to affect ordinary citizens, members of war-affected families, bloggers, and individuals critical of the authorities. Sharp and often uncivil speech by government representatives, defamatory accusations against opposition figures, and mocking, cutting rhetoric did not remain merely verbal. They were often accompanied by interventions by law-enforcement bodies and by administrative or criminal restrictions. At the same time, aggressive and degrading language by senior officials helped deepen hostility toward particular groups in society, especially Armenians from Artsakh, citizens with opposition views, and critics of

the government. Such rhetoric and conduct appear to have had, on the one hand, the character of hate speech, as evidenced by verbal attacks from citizens and numerous fake social media accounts, and, on the other hand, the effect of spreading fear and creating a “chilling effect” that discouraged citizens from speaking freely, participating in political life, and holding the authorities accountable.

The post-war climate of hatred and repression became particularly sharp in the run-up to the June 7, 2026 National Assembly elections.

During the pre-election period, the head of government openly attacked citizens who challenged him. One example was Armine Mosiyan, a young mother and the daughter of Meruzhan Mosiyan, a freedom fighter killed in the First Artsakh War. She refused to accept from Pashinyan a map-brochure from which Artsakh had been omitted. This apparently angered him, leading to a stream of accusations directed at the young woman and her frightened child. During this abusive exchange, he reportedly referred to Armenians from Artsakh as “those who fled.”

In another case, on May 18, during campaigning in Arabkir, Prime Minister Pashinyan verbally attacked obstetrician-gynecologist Arpine Sogoyan, apparently assuming she was from Artsakh, after she raised sharp questions. He reportedly grabbed her by the arm when she tried to walk away in distress and used threatening language. Sogoyan’s brother had been declared missing in the 44-day Artsakh war, and she was attempting to remind the Prime Minister about the issue of the missing. Shortly afterwards, it emerged that she had allegedly been pressured at her workplace to submit a resignation letter.

On May 18, 2026, after sharply questioning the Prime Minister during a campaign event about the rights of Armenians from Artsakh and war victims, Artsakh political figure Artur Osipyan, head of the “Artsakh Revolutionary Party,” was arrested. On the same day, the Prime Minister reportedly addressed him with deeply insulting remarks questioning why he was still alive. Osipyan was then detained for two months. According to his lawyer, he began a hunger strike immediately upon arrest, demanding a public apology from the Prime Minister. On June 9, after 22 days of hunger strike, he was released due to his deteriorating health. The case triggered broad public reaction, including sustained sit-ins and demonstrations, and was widely perceived as an example of a disproportionate and politically intolerant response to a citizen who had criticized the authorities during the pre-election period. On June 10, his preventive measure was changed to house arrest on the guarantees of civil society organizations and individuals, but the criminal prosecution continues.

Mikayel Margaryan, a member of the “Pan-Armenian Front” party, was subjected to political and criminal pressure after demanding publication of the results of the parliamentary inquiry into the 2020 44-day war. On March 26, 2026, he reportedly

attempted to meet National Assembly Speaker Alen Simonyan near parliament, where an altercation followed after he was treated with disrespect and contempt.

A particularly disturbing case involving a death also occurred during the pre-election period. Armen Hovhannisyanyan, a 53-year-old resident of Nshavan, was detained on May 14, 2026 on suspicion of tearing down a campaign poster of the ruling political force. He was held for two days at the Artashat police station and, on May 16, transferred to a psychiatric institution, where, according to the official version, he died by suicide the same day. Media reports indicate that he had previously been registered with psychiatric services. The circumstances of the case — especially the proportionality of measures used against a person with mental health issues, the conditions of his detention, and the reasons for his death shortly after transfer to a psychiatric institution — raised serious public concerns and demands for an independent and effective investigation. Critics have described the case as one of the most tragic manifestations of the climate of political intolerance during the pre-election period.

On June 7, a citizen arriving from Russia, Hovhannes Sahakyan, was arrested after telling a journalist that he had come to vote for a few hours and then return “before the situation gets complicated.” He was later released under a preventive measure prohibiting him from leaving the country. There were also numerous reports that citizens arriving from Russia were served notices requiring them to attend 25-day military training, which was widely seen as a form of political pressure.

On May 12, blogger Artak Avetisyan was detained after calling Prime Minister Pashinyan a “traitor” in a video and was released only on June 10.

On election day, in the village of Lichk in Gegharkunik province, Levon Hoxhikyan — the brother of journalist Nairi Hoxhikyan — was reportedly beaten. According to media reports, he had been acting as an authorized representative of an opposition force, and the incident allegedly followed his objections concerning electoral violations.

In early June 2026, reports emerged from Artik that Hakob Harutyunyan, a supporter of Robert Kocharyan, had been beaten near the municipal building. According to media reports, individuals associated with the ruling party were involved.

According to MP Gegham Manukyan, many citizens returning to Armenia from abroad during the pre-election period were served notices requiring them to attend 25-day military training, effectively preventing them from leaving the country. According to him, such measures were also used against clergy, elderly citizens, and critics of the authorities, raising concerns that the institution of military training was being used as a tool of political pressure and restriction of freedom of movement.

Armen Ashotyan, a representative of the “I Have Honor” alliance, had been under criminal prosecution since 2023 and had spent a prolonged period in detention. Opposition circles described the case as politically motivated and linked it to his consistent criticism of the authorities. On June 5, 2026 — just two days before the National Assembly elections — Ashotyan was again arrested in a case involving alleged abuse of office and money laundering. According to Republican Party representative Eduard Sharmazanov, the two of them had discussed the election process and the upcoming vote together on a live broadcast the night before. Opposition actors viewed both the timing of the arrest and its proximity to the elections as another manifestation of political pressure.

Another disproportionate and dishonest form of political discourse involved portraying political opponents, both in ruling party campaign materials and in public speech, as “parties bringing war” and as agents of foreign states, and labeling them as a “three-headed monster of war.” This message was reinforced visually and repeated by multiple representatives of the authorities in an effort to create the impression that peace would be possible only if Civil Contract remained in power and, in particular, if it secured a constitutional majority. The ruling party openly warned that Azerbaijan would unleash a new war in September if it failed to obtain such a majority. This rhetoric clearly heightened public emotions and was reflected in the flood of harsh criticism and hate speech directed at individuals criticizing the authorities, both on social media and in comment sections under media articles.

Another unprecedented development was the ruling party’s attempt to create public fear of a so-called hybrid war allegedly being waged by an enemy state — implicitly Russia — while at the same time seeking assistance from other foreign actors, particularly the European Union, to counter it. For that purpose, the authorities received 12 million in support.

Although this report does not seek to measure in detail the extent of resources invested in information campaigns by different sides, it identifies three methods that were clearly employed by pro-government circles:

1. Coordinated waves of abuse and intimidation through fake social media accounts, often using Armenian written in Latin script, aimed at drowning out dissent and discouraging citizens from further posting or speaking out;
2. Continuous repetition and amplification of the same false narratives, including attempts by government representatives to discredit particular individuals;
3. The emergence of numerous obscure media platforms, bloggers, and social media pages used to promote pro-government narratives.

Taken together, these cases point to an intolerant and polarizing pre-election environment in which criticism of the authorities or dissenting views were often framed as hostility, treason, or a threat to the state. Disproportionate responses toward citizens, public stigmatization, insulting rhetoric, and concerns regarding the selective use of legal mechanisms may have negatively affected voters' free expression of will, political participation, and public trust in the electoral process. These developments warrant independent assessment and effective investigation in light of international human rights and democratic election standards.

(6) THREATS OF DISPOSSESSION, DEMONIZATION, AND WITCH HUNTS

During the pre-election period, the rhetoric of senior representatives of the authorities gave particular prominence to statements directed against opposition figures with economic and political influence. These statements included public labeling, accusations of criminal conduct in the absence of judicial findings, and hints at possible property-related consequences.

These statements particularly targeted businessmen and political figures Samvel Karapetyan, Gagik Tsarukyan, and former President Robert Kocharyan. Given their public prominence and political influence, many observers saw this rhetoric not only as a tool of political struggle, but also as an attempt to create a climate of fear and self-censorship among potential opponents.

After Samvel Karapetyan signaled his willingness to engage in politics and support opposition initiatives, Prime Minister Pashinyan sharply attacked him in several public speeches, using degrading language and stating that he was ready to turn him into a "homeless bum." Beyond rhetoric, criminal proceedings were launched against Karapetyan, while the state began a process to alter control over the Electric Networks of Armenia, which his defenders characterized as a politically motivated attempt at dispossession.

During the campaign, Prime Minister Pashinyan also targeted Prosperous Armenia leader Gagik Tsarukyan, publicly linking him to money laundering and corruption schemes and hinting that his cement-producing enterprise could be taken under state control. Tsarukyan responded by stating that he had invested hundreds of millions of dollars in Armenia over many years, including in sports and social infrastructure, and argued that the accusations against him were political in nature. On June 9, criminal proceedings were initiated against Tsarukyan on charges of tax evasion on an especially large scale. Under Armenian law, criminal prosecution of an electoral candidate during elections requires the consent of the Central Electoral Commission, and a candidate may not be deprived of liberty absent such consent except in narrowly defined circumstances. According to

Tsarukyan's lawyer, he received no such notification from the CEC. A preventive measure prohibiting him from leaving the country was imposed on him.

During the same period, the Prime Minister also continued to direct grave accusations at former President Robert Kocharyan, linking him to the October 27, 1999 terrorist attack, the events of March 1, 2008, and systemic corruption, despite the absence of any court ruling establishing his guilt in those matters. According to opposition figures, such rhetoric contributed to the demonization of political opponents and reinforced in society the notion of "enemies of the people."

High-level statements concerning the loss of economic resources, criminal prosecution, and public stigmatization could be perceived as a signal not only to those directly targeted, but also to other political and economic actors. They may have reduced the willingness of others to participate in political life, finance opposition initiatives, or publicly express views differing from those of the authorities. At the same time, set against direct calls to violence by government representatives, this rhetoric also contributed to and deepened wider public hatred toward wealthy individuals, reinforcing distrust and sharp intolerance.

(7) PRESSURE AGAINST THE CHURCH IN A POLITICAL CONTEXT

The Armenian Apostolic Church remains one of the national institutions enjoying the highest levels of public trust and authority in Armenia, with significant influence on public opinion. For this reason, the systematic informational, political, and criminal-law pressure exerted against the Church and its senior representatives in the period preceding the 2026 parliamentary elections cannot be viewed solely through the lens of state–church relations. These developments unfolded in a context of deepening political polarization and electoral competition, affecting public discourse and contributing to the discrediting of voices critical of the authorities.

Pressure on the Church became particularly visible after an international conference dedicated to preserving the Armenian religious, cultural, and historical heritage of Artsakh was held in Bern, Switzerland, on May 26–28, 2025 at the initiative of Catholicos of All Armenians Karekin II. Organized with the support of the World Council of Churches and the Protestant Church in Switzerland, the conference drew international attention to the forced displacement of the Armenians of Artsakh, the destruction of cultural heritage, and violations of religious freedom. It was followed by statements by Allahshukur Pashazade, head of the Caucasus Muslim Board of Azerbaijan, portraying the Armenian Apostolic Church as a threat to regional stability. The Armenian Apostolic Church condemned those remarks as manifestations of Azerbaijani propaganda and hate speech.

During the same period, representatives of the Armenian authorities directed unprecedentedly harsh and degrading language at the Church. Prime Minister Pashinyan

publicly used the term “debased” in referring to it, while pro-government media platforms and social media circulated unverified and defamatory claims about the personal lives, moral character, and reputation of the leaders of the Armenian Apostolic Church. At the same time, a number of individuals associated with the Church or who publicly defended it became subject to criminal prosecution, including Archbishop Bagrat Galstanyan and the 17 citizens implicated in his case, Archbishop Mikael Ajapahyan, who is currently under house arrest, and one member of parliament whose immunity was lifted. Defense lawyers expressed concern that these cases were politically motivated, while the Mother See of Holy Etchmiadzin characterized them as persecution directed against the Church.

Campaigns aimed at discrediting a religious institution enjoying high public trust, together with insulting rhetoric and criminal proceedings against its leaders, may have affected the broader electoral environment by limiting the free participation in public debate of actors with significant societal authority and by reducing the visibility of alternative assessments of the authorities’ conduct. Such developments are especially troubling in a context where the democratic character of the electoral process depends on pluralism, the autonomy of institutions that enjoy public confidence, and protection for the free expression of critical opinion.

(8) PRESSURE ON LOCAL SELF-GOVERNMENT BODIES AND ATTEMPTS TO NEUTRALIZE ELECTORAL MANDATES

Particular attention should also be paid to the pattern observed at the level of local self-government, where the electoral success of opposition representatives has repeatedly been followed by criminal prosecutions, administrative obstacles, or other actions hindering the full exercise of their mandates. The cases of Vanadzor, Gyumri, and Parakar have all become subjects of wide public debate as possible examples of how legal and administrative tools may be used not only to restrict political competition during the pre-election period, but also to neutralize the expression of popular will once it has been formed through elections. This is significant in the context of this report because electoral rights concern not only freedom to vote, but also respect for election results and the effective exercise of the democratic mandates granted to elected representatives.

Vanadzor: obstruction of the exercise of an electoral mandate

In the 2021 local elections, the “Mamikon Aslanyan” alliance won in Vanadzor and, with the support of opposition forces, was preparing to form the municipal government. However, on December 15, 2021 — just days before the first meeting of the Council of Elders — former Vanadzor mayor and mayoral candidate Mamikon Aslanyan was arrested on charges of abuse of office and forgery. As a result, the Council of Elders meeting scheduled for December 24 did not take place, and the municipality remained without an elected leader for an extended period. While law-enforcement bodies maintained that the

case was unrelated to the election, opposition forces, civil society representatives, and a number of lawyers assessed the developments as the effective neutralization of the will of the electoral majority and an obstruction of the democratic mandate. Similar concerns were voiced by the Governing Board of the Anti-Corruption Coalition, which stated that the events following the election may have undermined democratic local self-government principles.

Gyumri: deepening political tension after an opposition victory

Following the 2025 local elections in Gyumri, cooperation among opposition forces resulted in the election of Vardan Ghukasyan as mayor after the defeat of the ruling party's candidate. Within months, however, a number of criminal proceedings were initiated against him. In October 2025, the Anti-Corruption Committee arrested both the mayor and several municipal employees on bribery charges, and additional criminal cases were subsequently brought against him. Law-enforcement bodies stated that there was sufficient evidence, while Ghukasyan's defenders and supporters described the proceedings as politically motivated and pointed to their timing in relation to the electoral success of opposition forces.

This situation deepened the tensions between central and local authorities and fueled public debate over the extent to which local election results are protected from subsequent political interference.

Parakar: continued tensions around opposition local government and the mysterious death of the community head

In the snap Council of Elders elections held in Parakar on March 30, 2025, the "Unity" alliance of parties won with around 57 percent of the vote, defeating the list of the ruling Civil Contract party. The alliance's leader, Volodya Grigoryan, was elected head of the community, becoming one of the representatives of opposition-led municipalities.

In the period following the election, Parakar remained at the center of political tension. Media reports and political statements repeatedly raised concerns that the activities of the opposition-led local government were being obstructed and that relations between the central authorities and the community leadership had become openly confrontational. Opposition figures and local officials argued that there were attempts to impose political control over the exercise of the mandate granted through elections, while government representatives rejected those claims as political speculation.

The killing of Volodya Grigoryan, which occurred shortly after his election, generated broad public reaction. Although the official investigation did not connect the incident to his political activity, many media reports and political commentaries raised questions

about possible political motives, emphasizing that serious public doubts and unanswered questions remain.

Together with Vanadzor and Gyumri, the Parakar case has become part of a broader public discussion about an important element of democratic elections: ensuring the autonomy of local authorities formed through elections and respect for the will of voters. These cases show that the effective protection of electoral rights concerns not only election day itself, but also the possibility of exercising, without obstruction, the mandates received through elections.

(9) GENERAL INTERNATIONAL STANDARDS

A. OSCE/ODIHR

The OSCE/ODIHR election observation methodology emphasizes that elections are not a one-day event, but a process encompassing the entire pre-election environment, including the protection of fundamental rights, freedom of campaigning, media pluralism, and the absence of pressure on citizens.

ODIHR notes that election assessments examine not only procedures on election day, but also “administrative constraints in the pre-election environment and disregard for fundamental civil and political rights.”

Observation missions therefore assess the broader pre-election environment, including administrative limitations and disregard for basic civil and political rights.

B. The Venice Commission standard

The Venice Commission and the OSCE/ODIHR define the misuse of administrative resources as:

“Obtaining an unfair advantage by certain parties or candidates through the use of public office or connections to public institutions with the aim of influencing the outcome of elections.”

They also state that:

“The key criterion for invalidating elections is whether the recorded violations may have affected the election result.”

The creation of an atmosphere of fear, the targeting of voters or influential public actors, and the selective use of state leverage are incompatible with the principles of equal opportunity and free expression of political will.

C. UN Human Rights Committee, General Comment No. 25

(ICCPR, General Comment No. 25)

“Persons entitled to vote must be free to vote for any candidate ... free to support or oppose government, without undue influence or coercion of any kind which may distort or inhibit the free expression of the elector’s will.”

“Voters should be able to form opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative interference of any kind.”

D. ECtHR: the special responsibility of politicians

According to the case law of the European Court of Human Rights, persons exercising public authority bear special responsibility for the consequences of their public speech, since their statements may influence public attitudes, social sentiments, and the emergence of intolerance toward particular groups. Accordingly, rhetoric by politicians that incites hatred, humiliation, or intolerance may conflict with the basic values of a democratic society.

In *Nepomnyashchiy and Others v. Russia* (2023), the Court stated:

“It is of crucial importance that politicians, including parliamentarians, avoid making statements promoting hatred or intolerance in their public speech.”

“Politicians must take particular care to defend democratic principles.” (§ 75)

In *Behar and Gutman v. Bulgaria* (2021), the Court further confirmed that even parliamentary speech is not protected when it runs contrary to the democratic values of the Convention:

“...the exercise of freedom of expression, even by members of parliament, carries with it duties and responsibilities.”

E. ECtHR: political repression and the timing of criminal prosecution

The ECtHR has developed a substantial body of doctrine under Article 18, which prohibits restrictions being applied for purposes other than those for which they are prescribed. In other words, this concerns the use of lawful instruments for concealed political purposes.

In *Selahattin Demirtaş v. Turkey* (Grand Chamber, 2020), the Court held that criminal prosecution and pre-trial detention were not lawful interferences because they pursued “the ulterior purpose of stifling pluralism and limiting freedom of political debate.”

The Court attached particular importance to:

- the applicant’s role as an opposition leader,
- the timing of the prosecution,
- and its coincidence with political developments.

It concluded that the applicant's detention pursued the hidden purpose of suppressing political pluralism and restricting democratic debate, finding a violation of Article 18 in conjunction with Article 5 of the Convention.

In *Navalnyy v. Russia* (2018), the Court likewise held that the restrictions imposed on the applicant's rights pursued an ulterior purpose — namely the suppression of political pluralism, which is an essential component of effective political democracy governed by the rule of law.

In that case, the Court placed particular emphasis on:

- the growth of opposition activity,
- the applicant's public influence,
- and the intensification of persecution at politically significant stages.

According to ECtHR jurisprudence, even where criminal prosecution is formally based on charges provided by law, it may still amount to a politically motivated restriction if the surrounding circumstances, timing, disproportionate character of the measures, and impact on political activity indicate that the real aim was to suppress pluralism and restrict political competition. In such cases, the Court may find a violation of Article 18, concluding that legal mechanisms were used not for their lawful purposes, but to restrict political dissent.

Even if the accusations brought by the authorities formally fall within the sphere of criminal law, their timing, selective application, disproportionality, and political effect may demonstrate that their real function was not the administration of justice, but the restriction of political pluralism.

(a) Comparative example: Poland (2023)

Similar concerns were documented by OSCE/ODIHR in other countries, including during Poland's 2023 elections, where observers criticized divisive rhetoric and the use of state advantages by those in power. They noted that the campaign was characterized by intolerant and divisive rhetoric and that the authorities enjoyed undue advantage through the use of state resources and influence over public media.

(b) Comparative example: Georgia (2024)

ODIHR similarly recorded concerns during elections in Georgia, stating that reports of intimidation and pressure on voters negatively affected public trust in the process, that questions regarding the impartiality of state institutions undermined trust in the outcome, and that campaign rhetoric and imagery were highly divisive.

It also noted that pressure on voters, especially public sector employees, remained widespread during the campaign, and that extensive tracking of voters on election day raised concerns about whether some voters could cast their ballots free from fear of retribution.

(c) Comparative example: Romania (2024)

On December 6, 2024, Romania’s Constitutional Court annulled the entire first round of the presidential election on the grounds of external interference, systematic manipulation, violations of campaign transparency, and distortion of electoral equality.

(d) Comparative example: Austria (2016)

Austria’s Constitutional Court annulled the second round of the presidential election. Although fraud was not proven, the Court held that procedural violations may have affected the outcome.

This precedent is particularly relevant because, once again, the standard applied was whether the violations “may have affected the outcome,” on the basis that the most fundamental democratic principle — the people’s right freely to choose their rulers — had been called into question.

(10) REPRESSION UNDER DOMESTIC LEGISLATION

A. Constitution of the Republic of Armenia

(Article 48. Principles of Electoral Rights)

Elections must be held on the basis of universal, equal, free, and direct suffrage by secret ballot.

This means that the concept of “free elections” relates not only to election day itself, but to the entire pre-election environment.

B. The principle of free expression of will

One of the core provisions of Armenia’s Electoral Code (Article 4. Free Electoral Right) states:

“Elections are conducted on the basis of the principles of freedom and voluntariness in the exercise of electoral rights.”

“No one shall have the right to compel a voter to vote for or against any candidate, party, or alliance of parties, or to compel a voter to participate or not participate in elections.”

“No one may, by any form of coercion, force a voter to reveal how he or she intends to vote or how he or she voted.”

In essence, this means that not only physical coercion is prohibited, but also the creation of an atmosphere capable of influencing the voter's free choice.

The cases presented above are therefore also troubling from the standpoint of domestic law. Armenia's Electoral Code clearly provides that no one may compel a voter to vote or not vote for any candidate or party, or force a voter to reveal his or her political choice. Elections must be conducted on the basis of free electoral rights, which presupposes a pre-election environment in which citizens can express their political views, take part in public discussions, and make electoral decisions without fear, pressure, reprisal, or stigmatization. Against the backdrop of defamatory information targeting electoral contestants, accusations not confirmed by a court, violations of the presumption of innocence, and an overall repressive climate, election results produced under such conditions call into question the legitimacy of the authorities elected through them and risk undermining stability in a country already facing a difficult geopolitical environment. Such circumstances do not inspire confidence in the authorities resulting from those elections.

In remarks made on June 11, Prime Minister Pashinyan mocked and stigmatized those Armenian citizens who had not voted for the Civil Contract party, groundlessly describing hundreds of thousands of voters as "bribed" and deepening the already pervasive atmosphere of polarization. He threatened to arrest those "implicated in vote-buying" before the next election cycle concluded and stated that if opposition deputies took up their mandates, parliament would contain "bundles of money" from which "there is no benefit whatsoever." This unacceptable rhetoric, which bears no resemblance to legitimate political debate and lies outside the bounds of elementary civility, is just one example of the defamatory and insulting speech directed at the opposition and the broader public by representatives of the authorities across multiple platforms.

Given the atmosphere that prevailed throughout the pre-election period and even afterwards — in which disproportionate reactions toward critics of the authorities, threats, public humiliation, and the selective use of legal mechanisms became a routine mode of conduct for the ruling authorities — these developments may be viewed not only as incompatible with international standards, but also with the spirit and purpose of Armenia's electoral legislation. The concerns raised in this regard are well-founded and may provide strong grounds for invalidating the results of the June 7 elections.

CONCLUSION

Taken as a whole, the cases described above point not merely to a series of isolated incidents, but to a broader systemic environment that developed during the pre-election period. In this environment, pressure on political opponents, influential public institutions, journalists, and ordinary citizens, combined with hostile rhetoric and concerns about the

selective use of legal mechanisms, may have had a significant impact on voters' ability to freely form and express their political will, as well as on public confidence in the electoral process.

Democratic elections require more than technically orderly voting procedures. They also require a pre-election environment in which citizens are able to speak freely, participate in political life, and make electoral choices without fear of retaliation, punishment, humiliation, or stigmatization.

Under European democratic standards, systematic discrediting campaigns carried out by the authorities against institutions and public figures enjoying public trust may undermine electoral pluralism if they restrict those actors' participation in public debate or limit their ability to present alternative viewpoints to society.

In light of the above, we conclude that the broad atmosphere of fear and intimidation generated by the authorities, together with large-scale arrests on vague and unsubstantiated grounds and in seemingly fabricated cases, significantly affected citizens' free expression of will. Accordingly, these developments may amount to massive and serious violations of the fundamental right to freely express one's will through elections, and they call into question both the credibility of the results of the nationwide elections held in the Republic of Armenia on June 7, 2026, and the legality of the elections themselves.