State Capture Accountability Project

IPHR International Partnership for Human Rights

BRIEFING: RUSSIAN TRANSNATIONAL REPRESSION

Russia's Federal Law No. 284-FZ: suspension of rights causing 'civic death' for dissidents

6 August 2026

Introduction

On 4 August 2026, President Putin signed Federal Law No. 284-FZ 'On Temporary Restrictive Measures against Persons Located Outside the Russian Federation and Evading the Execution of Punishment'.[1] The law entered into force the same day, upon official publication.[2] It creates a public register of Russian citizens abroad who are deemed to be 'evading punishment'. This covers people convicted in absentia under any criminal article, and those penalised under the administrative provisions most used against Kremlin critics. Those listed lose property, banking, notarial, digital-government and consular rights. Russian human rights lawyers describe the result as 'civic death' and de facto deprivation of citizenship.[3]

This note summarises the law, assesses its impact on the Russian exile population and concludes that the law constitutes a form of transnational repression.

State Capture Accountability Project (SCAP) and International Partnership for Human Rights (IPHR) urge all national authorities to:

- Formally designate Law No. 284-FZ as an act of transnational repression and treat those listed under this law as targets of transnational repression.

[1] Federal Law No. 284-FZ of 4 August 2026 'On Temporary Restrictive Measures against Persons Located Outside the Russian Federation and Evading the Execution of Punishment' (*О временных ограничительных мерах в отношении лиц, находящихся за пределами Российской Федерации и уклоняющихся от исполнения наказания*), Official Internet Portal of Legal Information, No. 0001202608040009, 4 August 2026, http://publication.pravo.gov.ru/document/0001202608040009; consolidated text: https://www.consultant.ru/document/cons_doc_LAW_540984/.

[2] Law No. 284-FZ (n 1), Art. 11.

[3] Pervyi Otdel (First Department), 'Bolshoy zakonoproekt protiv politicheskoy emigratsii. Razbor', 11 December 2025 (updated 23 July 2026), https://dept.one/memo/razbor/.

- Task officials to monitor the Ministry of Justice register and identify residents as they are listed.
- Treat listing on the register as strong evidence of persecution risk in asylum claims.
- Issue temporary travel documents to Russian citizens designated under Law No. 284-FZ when they are unable to obtain valid Russian passports.
- Accept expired Russian passports as proof of identity in immigration, banking and administrative processes where the holder is listed.
- Waive requirements for Russian consular or notarised documents for listed persons, and accept alternative evidence.
- Issue guidance to banks emphasising that the register under Law No. 284-FZ is a political instrument, not a financial-crime indicator.
- Apply targeted sanctions against persons responsible for the design and implementation of Law No. 284-FZ.
- Condemn this law in relevant multilateral fora and set out its opposition and concerns directly to the Russian Government.
- Engage allies on coordinated mitigation strategies covering travel documentation, banking access and protection routes.

Scope and powers under Federal Law No. 284-FZ

Legislative history and commencement. Bill No. 1095029-8 was prepared by the State Duma's commission on foreign interference, chaired by Vasily Piskarev. It was introduced in December 2025 and passed first reading that month.[4] The State Duma adopted the law on 22 July 2026. The Federation Council approved it on 24 July 2026.[5] The President signed it on 4 August 2026. Under Article 11, it entered into force on the day of its official publication, 4 August 2026. There is no transition period.[6]

Scope and purpose. Duma Speaker Vyacheslav Volodin described the intended targets of this law as 'extremists, traitors to our Motherland, those who for years have tried to do everything to destroy our state … while hiding from punishment in other countries'. He added that 'those who left need to think about how they will turn themselves in to the court and confess'.[7] Article 1 sets out the law's

[4] Bill No. 1095029-8, State Duma legislative record, https://sozd.duma.gov.ru/bill/1095029-8; State Duma news, 22 July 2026, http://duma.gov.ru/news/63905/.
[5] Law No. 284-FZ (n 1), enacting formula.
[6] Law No. 284-FZ (n 1), Art. 11.
[7] The Insider, 23 July 2026, https://theins.press/en/news/295216; Meduza, 4 August 2026, https://meduza.io/en/news/2026/08/04/putin-signs-law-restricting-the-rights-of-kremlin-critics-living-abroad-who-are-prosecuted-in-absentia.

purpose as 'ensuring the inevitability of punishment'. The law applies to individuals outside Russia who evade execution of a criminal penalty. It also applies to those who evade an administrative penalty imposed under six provisions of the Code of Administrative Offences (CAO): Article 19.5(42) and Article 19.34 (violations of the 'foreign agent' regime); Article 20.3.2 (calls to violate Russia's territorial integrity); Article 20.3.3 ('discrediting' the armed forces); Article 20.3.4 (calls for sanctions against Russia); and Article 20.33 (participation in an 'undesirable organisation').[8] All criminal convictions qualify, including *in absentia* convictions widely used against exiled critics.[9] OVD-Info assesses that the register will in practice extend to convictions and penalties that pre-date the law.[10]

Listing mechanism. Three cumulative grounds trigger the measures under Federal Law No. 284-FZ (Article 3):

(i) An in-force sentence or in-force administrative penalty under the provisions above;

(ii) Evasion of the penalty, as confirmed by an authorised federal body; and

(iii) Presence outside Russia, evidenced by a confirmed crossing of the state border.

The decision to apply the measures is taken by the Ministry of Justice (Article 4(1)). The Interior Ministry, the Federal Security Service, the bailiff service, the tax service and the Prosecutor General's Office submit listing proposals (Article 4(2)). The Ministry of Justice maintains the list and publishes it on its website (Article 4(4)). The measures apply from the day after the person's entry is published and last until the entry is removed (Article 2(2)).

The restrictive measures. Article 2(1) sets out fourteen restrictive measures which apply to persons designated under this legislation:

- Property and transport: applications to register rights over real estate, or for cadastral registration, are returned without consideration (item 3); state registration of vehicles is prohibited (item 5); the right to drive is restricted (item 4). In effect, a listed person cannot sell, buy, gift or inherit real estate or drive a vehicle in Russia.[11]
- Finance: credit and loan agreements are refused (item 6); banks must block the person's access to their software for money transfers, including mobile apps and websites (item 9); money and other assets are frozen, subject to narrow exceptions (item 10).[12]

[8] Law No. 284-FZ (n 1), Art. 1.
[9] Meduza (n 7); OVD-Info, legal guidance on the law, August 2026, https://ovdinfo.legal/instruction/emigrants.
[10] OVD-Info (n 9).
[11] Law No. 284-FZ (n 1), Art. 2(1), items 3, 4 and 5; OVD-Info (n 9) (interpretation of practical effect).
[12] Law No. 284-FZ (n 1), Art. 2(1), items 6, 9 and 10.

- Income: all payments due to the person from public budgets, organisations or individuals must be made to a single special rouble account. The account's regime is set by decision of the Board of Directors of the Central Bank. Sums owed to the state are debited from it.[13]
- Work and services: registration as an individual entrepreneur (item 1) or as a self-employed taxpayer (item 2) is prohibited; electronic state and municipal services are refused (item 7); licences, permits and accreditations are refused, and existing ones suspended (item 8).[14]
- Legal capacity: transactions and other legally significant acts by power of attorney are prohibited (item 13); notarial acts in the person's interest are refused (item 12); use of an electronic signature is prohibited and existing signature certificates are annulled (item 14).[15]
- Consular services: specified consular functions under the 2010 Consular Statute are withdrawn (item 11). Only two consular notarial acts are preserved: certifying that a person is alive and certifying a blind person's signature. Affected persons cannot obtain passports, register marriages or name changes, or obtain most other consular documents and assistance.[16]

Duration and removal. The measures are styled 'temporary' but carry no time limit. Article 5 permits removal only in four cases: the sentence or penalty ruling is quashed, deferred or discharged; the person executes, or begins executing, the penalty; the person's presence in Russia is confirmed; or the person dies. The Ministry of Justice decides on removal (Article 6). A listed person may apply for removal, and the Ministry of Justice must decide within twenty working days. Refusals may be challenged in court (Article 8).[17]

Family members and third parties. Close relatives of designated persons without independent income may be awarded a monthly 'humanitarian allowance' by an interagency commission whose composition is approved by the President. The allowance is paid out of the listed person's own frozen assets or special account (Article 10(1)). Persons claiming loss from the listed person's non-performance of obligations may sue for recovery from the frozen assets (Article 10(2)-(3)).[18]

Related legislation. Federal Law No. 285-FZ, signed and in force the same day, makes corresponding amendments to the Notariat Fundamentals, the road safety law, the business registration law, the state services law and the real estate registration law, among others.[19] A separate law adopted in

[13] Law No. 284-FZ (n 1), Art. 9.
[14] Law No. 284-FZ (n 1), Art. 2(1), items 1, 2, 7 and 8.
[15] Law No. 284-FZ (n 1), Art. 2(1), items 12, 13 and 14.
[16] Law No. 284-FZ (n 1), Art. 2(1), items 11 and 12; OVD-Info (n 9) (interpretation of practical effect).
[17] Law No. 284-FZ (n 1), Arts. 5, 6 and 8.
[18] Law No. 284-FZ (n 1), Art. 10.
[19] Federal Law No. 285-FZ of 4 August 2026 'On Amendments to Certain Legislative Acts of the Russian Federation', summary and text: https://www.consultant.ru/law/hotdocs/95111.html; https://www.consultant.ru/document/cons_doc_LAW_540985/.

May 2026 extends administrative liability to acts committed abroad 'against the interests of the Russian Federation' and expands asset freezing and seizure powers.[20]

Anticipated Impact of Federal Law No. 284-FZ and reactions

Estimates of the number of Russians who left Russia in the first year after the full-scale invasion range from 500,000 to over one million. The law is designed to extend the reach of the Kremlin's repressive tactics to that population.[21] By late 2025, at least 1,299 people had faced criminal prosecution for opposing the war.[22] Those at greatest risk include people on the 'foreign agents' register, defendants in criminal or politically motivated administrative cases, activists, journalists, lawyers and human rights defenders. Media workers account for over a third of all 'foreign agent' and 'undesirable organisation' designations. More than 1,500 Russian journalists have fled Russia since 2022.[23] Exiled politician Dmitry Gudkov estimates that around 100,000 people who took part in anti-war activity and retain property or documentation ties to Russia are at particular risk.[24]

Listed exiles lose the ability to sell or inherit property in Russia, to access savings, or to act through relatives or lawyers under powers of attorney. The denial of passports and consular documentation is the most consequential measure for host states. Affected persons cannot renew identity documents. This pushes them towards *de facto* statelessness and creates immediate demand for alternative travel and identity documents in countries of residence.[25]

Marie Struthers, Amnesty International's Eastern Europe and Central Asia Director, said: "This legislation is a chilling attempt to punish people who have left Russia but continue to criticize its authorities [...] The Russian state is now designing new ways to reach across borders and harm them." Amnesty urged that "the governments of hosting countries must urgently develop practical

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[20] Novaya Gazeta Europe, 26 May 2026, https://novayagazeta.eu/en/articles/2026/05/26/russian-lawmakers-advance-bill-to-punish-citizens-abroad-for-acting-against-russias-interests-en; The Insider (n 7).

[21] Euronews, 23 July 2026, https://www.euronews.com/2026/07/23/russia-strips-rights-of-dissidents-abroad-in-sweeping-new-traitor-law.

[22] OVD-Info data cited in Euronews (n 21).

[23] RSF, 'Russia: new law expands the Kremlin's legal persecution of exiled journalists', July 2026, https://rsf.org/en/russia-new-law-expands-kremlin-s-legal-persecution-exiled-journalists.

[24] Vot Tak, 5 August 2026, https://vot-tak.tv/94703846/zakon-putin-diskriminatsia (quotes translated from Russian).

[25] OVD-Info (n 9).

mechanisms to counter the Russian government's repressive overreach", including access to banking and essential documents.[26]

Lawyers at the First Department (Pervyi Otdel) NGO call the law "de facto deprivation of citizenship [...] A person who left for political reasons and has been recognised as 'evading' acquires the status of an internally 'cancelled citizen' [...] Everything connected with the Russian Federation – property, accounts, business, consular services – can be used against them, while they themselves are practically deprived of any opportunity to use this in their own interests."[27]

Reporters Without Borders (RSF) said: "This new law adds yet another layer to an already extensive legal arsenal aimed at crushing independent journalism. It targets journalists in exile, highlighting the Kremlin's determination to intensify its transnational repression. By extending their crackdown beyond Russia's borders, the authorities seek to make exile ever more precarious and to further silence independent reporting."[28]

Exiled opposition politician Dmitry Gudkov said: "This law in essence deprives us of civil rights and effectively of citizenship." Sergei Smirnov, editor-in-chief of Mediazona, calls it "discrimination in its purest form". OVD-Info spokesperson Dmitry Anisimov notes that it "sends a signal to all Russians who have left' that they 'should not feel safe abroad' and that the authorities 'can reach them".[29]

Why Federal Law No. 284-FZ is a form of transnational repression

G7 leaders describe transnational repression as "an aggressive form of foreign interference whereby states or their proxies attempt to intimidate, harass, harm or coerce individuals or communities outside their borders".[30] According to the Parliamentary Assembly of the Council of Europe, transnational repression should be understood as "a form of foreign interference by a State, its organs, proxies and/or persons whose actions can be attributed to that State, employed to intimidate, silence, harass, coerce, abduct, harm or kill individuals beyond the State's borders, including political dissidents, activists, human rights defenders, journalists, political opponents, religious and ethnic minority groups, academics, members of diaspora and exile communities and/or

[26] Amnesty International, July 2026, https://www.amnesty.org/en/latest/news/2026/07/russia-draft-law-imposing-sweeping-restrictions-on-government-critics-abroad-weaponizes-punishment-to-silence-dissent/.
[27] First Department analysis quoted in Euronews (n 21).
[28] RSF (n 23).
[29] Vot Tak (n 24).
[30] G7 Leaders' Statement on Transnational Repression, Kananaskis, 17 June 2025, https://www.pm.gc.ca/en/news/statements/2025/06/17/g7-leaders-statement-transnational-repression.

their relatives, regardless of their nationality."[31] Recognised methods of transnational repression include violence, threats, digital attacks and harassment, impediments to mobility, extradition and Interpol abuse, and proxy punishment of relatives.[32] Federal Law No. 284-FZ is an archetypal example of transnational repression.

First, the law is designed to target critics and opponents of the regime. The only administrative offences that trigger listing are the regime's signature political statutes: 'foreign agent' violations, 'discrediting' the army, calls for sanctions, and 'undesirable organisation' involvement. These provisions are used overwhelmingly against journalists, activists and war critics. Many were convicted *in absentia* after they had already left. The Duma Speaker's own framing, 'traitors' who must 'turn themselves in and confess', confirms that the intended targets are political opponents abroad, not ordinary fugitives.[33]

Second, the law operationalises repression across borders. The coercive effects of the new law are aimed at persons who left the country fleeing from repression or reside outside Russia and are vocal critics of the Russian authorities. The purpose is to force dissidents to return, pay or fall silent. The law effectively codifies impediments to mobility, asset seizure and denial of fundamental civic rights under one instrument of administrative transnational repression.

Third, the impact of the law is not only on the designated individuals, but on the entire exile community. The public register is built to intimidate the wider exile community into silence and self-censorship. It shows Russians abroad that the authorities 'can reach them'. This chills diaspora political participation well beyond those actually designated. RSF expressly characterises the law as an intensification of the Kremlin's transnational repression of exiled media.[34]

Fourth, the law is extraterritorial by design. Presence outside Russia is a constitutive condition of listing. But rather than being an instrument of enforcement of universal application, it is designed to target the Kremlin's critics and opponents in exile. The administrative provisions that trigger listing are confined to the offences used to punish political speech and association; criminal convictions are routinely entered in absentia against persons who had already left; and the law's own authors describe its targets as traitors who must turn themselves in and confess. Clearly, the object of the

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[31] Resolution 2669 (2026), "Fighting back against transnational repression", June 2026, https://pace.coe.int/pdf/ad4e3bab697d3177fa6c8532f6be356c696fccc1ced28701a899dd544dac61f9/res.%202669.pdf.

[32] OHCHR, 'Transnational Repression' (information brief), June 2025, https://www.ohchr.org/sites/default/files/documents/publications/transnational-repression-1-en.pdf.

[33] The Insider and Meduza (n 7); The Moscow Times, 4 August 2026, https://www.themoscowtimes.com/2026/08/04/putin-signs-law-targeting-exiled-russians-convicted-in-absentia-a93414.

[34] Vot Tak (n 24); RSF (n 23).

law is not enforcement but silencing. Its purpose is to suppress free expression, independent journalism, human rights work and civil society activity that exiled Russians conduct from the territory of other States. This suppression degrades the information environment and freedom of speech in the hosts States.

Fifth, the law enlists the inadvertent participation of public and private institutions of host States in Russia's repression: the bank refusing to open an account as it cannot verify an identity because the passport has expired and cannot be renewed; the immigration authority that refuses a visa as it requires a consular document that will not be issued; the notary who cannot accept an annulled electronic signature to process a transaction; the registrar who refuses certification because of a missing power of attorney that Russian law now prohibits. Such measures not only undermine the exercise of basic rights and democratic freedoms on host state territories, but also subvert host state institutions and therefore undermine host state sovereignty.[35]

Conclusions and asks

For the foregoing, SCAP and IPHR aver that Federal Law No. 284-FZ is transnational repression in legislative form. The Russian State will use this law to reach beyond its borders to punish, silence and coerce its exiled opponents and critics, and to intimidate the diaspora as a whole. Host country authorities and international organisations should treat this law as a form of Russian transnational repression, and respond to it accordingly.

Specifically, SCAP and IPHR call on host country authorities to:

- Formally designate Law No. 284-FZ as an act of transnational repression and treat those listed under this law as targets of transnational repression.
- Task officials to monitor the Ministry of Justice register and identify residents as they are listed. Maintain a running record of affected persons and use it to anticipate documentation and banking problems before they arise.
- Treat listing on the register as strong evidence of persecution risk in asylum claims.
- Issue temporary travel documents to Russian citizens designated under Law No. 284-FZ when they are unable to obtain valid Russian passports.
- Accept expired Russian passports as proof of identity in immigration, banking and administrative processes where the holder is listed.
- Waive requirements for Russian consular or notarised documents for listed persons, and accept alternative evidence.

[35] G7 (n 30); Amnesty International (n 26).

- Issue guidance to banks emphasising that the register under Law No. 284-FZ is a political instrument, not a financial-crime indicator. Listing should not trigger de-banking, de-risking or sanctions-screening refusals. Banks should offer basic banking services to designated persons who cannot produce standard identity documents.
- Apply targeted sanctions against persons responsible for the design and implementation of Law No. 284-FZ.
- Condemn this law in relevant multilateral fora (G7, UN Human Rights Council, Council of Europe, OSCE) and set out its opposition and concerns directly to the Russian Government.
- Engage allies on coordinated mitigation strategies covering travel documentation, banking access and protection routes.