

**ABUSE OF THE COUNTER-
-TERRORISM AND FINANCIAL
CONTROL FRAMEWORKS
BY THE LUKASHENKA
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THE INCLUSION
OF TARGETED EXILED
INDIVIDUALS IN THE
GOVERNMENT-DRAWN LISTS
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TABLE OF CONTENTS

INTRODUCTION TO BELARUSIAN “EXTREMISM” 7

Anton Saifullayeu

**ABUSE OF THE COUNTER-TERRORISM AND FINANCIAL
CONTROL FRAMEWORKS BY THE LUKASHENKA REGIME
THROUGH THE INCLUSION OF TARGETED EXILED INDIVIDUALS
IN THE GOVERNMENT-DRAWN LISTS OF “EXTREMISTS”
AND “TERRORISTS” 15**

Natasza Krawczyk (iSANS)

INTRODUCTION TO BELARUSIAN “EXTREMISM”

Anton Saifullayeu

In Belarus, repression is understood in a broad sense. In addition to “standard” measures such as imprisonment and fines, over the past five years, the Belarusian authorities have developed a well-established repressive system that operates both domestically and internationally to persecute and intimidate individuals. Today, this system includes political arrests; criminal cases for “extremism” and “discreditation”; torture and ill-treatment in pre-trial detention facilities; administrative arrests; dismissals from employment; deprivation of parental rights; mass fines; and financial persecution, including confiscation of property and the loss of businesses. The targeting of journalists, activists, and volunteers also continues. According to the human rights centre Viasna, which summarised five years of monitoring, more than 100,000 cases of repression against Belarusian and foreign citizens have been documented, primarily on political grounds. Since 2020, Viasna has recognised 4,064 individuals as political prisoners, and as of the end of 2025, approximately 1,200 political prisoners remain in detention¹.

Since the mid-2000s, Belarusian authoritarianism has pursued a strategy of prevention, implementing pre-emptive

¹ *Pyat' let repressiy v Belarusi: boleye 100 000 faktov* [Five years of repression in Belarus: more than 100,000 cases], 9 August 2025, <https://spring96.org/ru/news/118453> [27.12.2025]; *Situatsiya s pravami cheloveka v Belarusi. Noyabr'–dekabr'2025* [Human rights situation in Belarus. November–December 2025], 5 December 2025, <https://spring96.org/ru/news/119208> [12.12.2025].

measures against individuals and organisations perceived as threats to the regime². After 2020, this system of preventive authoritarianism significantly transformed the country's legal framework, began actively exploiting the mechanisms of international law, and substantially redefined key terms such as **extremism** and **terrorism**. Furthermore, the expanding security apparatus within the Ministry of Internal Affairs and the KGB has made repression an integral part of a vast punitive system that is disproportionate to the country's population.

The additions and revisions to the conceptual framework regarding **extremism** and **terrorism** in Belarusian legislation have significantly expanded the scope of the preventive strategy. In the Belarusian context, these two concepts have become closely intertwined, with one effectively deriving from the other in practice. A key element of the repressive machinery of the Belarusian counter-revolution has been the broadening of interpretations of extremism and terrorism, which now serve as the legal basis for political persecution and the systematic dismantling of independent media and organisations, primarily within the third sector.

In May 2021, amendments to the law on countering extremism were adopted, introducing changes to the Civil Procedure Code; the law was further supplemented in 2023³. These changes established accelerated procedures for cases involving organisations and individual entrepreneurs deemed to exhibit signs of “extremism”, as well as the recognition of symbols, attributes, and information products as so-called “extremist materials”. For the first time in Belarusian legislation, definitions of “extremist symbols and attributes” and “extremist formation” were introduced,

² For example, here: V. Silitski, *Preempting Democracy: The Case of Belarus*, “Journal of Democracy” 2005, vol. 16, no. 4, pp. 83–97.

³ *Zakon Respubliki Belarus’ “O protivodeystvii ekstremizmu”* [Law of the Republic of Belarus “On Countering Extremism”], entered into force 21 January 2007, <https://pravo.by/document/?guid=11031&p0=h10700203> [12.12.2025].

while the concepts of “extremism” and “extremist materials” were further expanded.

Additionally, the range of state bodies authorised to enforce the “extremism law” was substantially broadened. The law permits the banning and suspension of activities of so-called “extremist organisations” and entrepreneurs, imposes restrictions on holding assemblies, participating in public authorities, and using certain symbols, establishes procedures for the liquidation of organisations, and tasks the Ministry of Internal Affairs with maintaining and publishing lists of individuals and organisations involved in “extremist activities”, with a formal mechanism for removal from these lists⁴.

Alongside these legislative changes, institutional structures were established to implement the new provisions, aiming to unify and tighten control over all forms of dissent across every level of Belarus’s socio-political context⁵.

In common analytical usage, extremism is typically classified using three main criteria: spatial positioning on the political spectrum (left–right), ideological content (the substance of programmatic goals and appeals), and the degree to which an actor challenges or rejects established

⁴ *Proekt Zakona Respubliki Belarus’ “Ob izmenenii zakonov po voprosam protivodeystviya ekstremizmu”* [Draft Law of the Republic of Belarus “On Amendments to Laws on Countering Extremism”], submitted 16 April 2021, <https://sovrep.gov.by/special/ru/zakony-ru/view/proekt-zakona-respubliki-belarus-ob-izmenenii-zakonov-po-voprosam-protivodejstvija-ekstremizmu-517/> [12.12.2025]; *Zakon Respubliki Belarus’ “Ob izmenenii zakonov po voprosam protivodeystviya ekstremizmu”* [Law of the Republic of Belarus “On Amendments to Laws on Countering Extremism” (Law No. 104-3)], 14 May 2021, <https://pravo.by/document/?guid=3961&p0=H12100104> [12.12.2025].

⁵ The Interdepartmental Commission on Countering Extremism and Fighting Terrorism was established by Presidential Decree No. 450 of 22 November 2021: *Ukaz Prezidenta Respubliki Belarus’ “O Mezhdovodstvennoy komissii po protivodeystviyu ekstremizmu i bor’be s terrorizmom”* [Presidential Decree of the Republic of Belarus “On the Interdepartmental Commission on Countering Extremism and Fighting Terrorism”], 22 November 2021, <https://president.gov.by/ru/documents/ukaz-no-450-ot-22-noyabrya-2021-g> [15.12.2025].

political legitimacy. In the Belarusian context, however, the expanded legal definitions give the authorities the ability to interpret virtually any non-systemic project or organisation – for example, within the third sector – as extremist, regardless of its ideological content. The Lukashenka regime has relied on concepts of legitimacy and legality that, after 2020, no longer existed *de facto* in the country, but have been exploited *de jure* far more extensively than before the protests. In effect, beginning in late 2020, the reinterpretation and expansion of legislation became the first line of defense for the counter-revolution, ultimately creating one of the most sophisticated repressive systems in 21st-century Europe, in terms of both its reach and before tangible impact.

From a logical perspective, this step aligns with the regime's broader approach, particularly considering that the Belarusian authorities have never prioritised human rights. Based on even the limited sociological data available after 2020, the regime in Minsk can classify up to a third of the population as a potential threat. In this context, it becomes necessary to provide formal legal justification for what is, in practice, a state of lawlessness. The Belarusian political system, built on the security apparatus, seeks to ensure the legal legitimacy of its actions while also reinforcing its formal "popular" character by targeting those who oppose it.

The 2020 protests revealed both the mass scale of public discontent and the authorities' inability to confront it on equal ideological and legal terms. This helps explain the conceptual shift in the definitions of "extremism" and "terrorism", expanding their application to include those opposing the "legitimate" authorities. As a result, those who oppose the regime risk imprisonment for up to 15 years, while others, intimidated by the threat of being labeled "extremists", end up supporting a system of force over reason. This dynamic became particularly pronounced after 2022, when the long-standing postulate of Lukashenka – "as long as there is no war" – effectively disappeared, and

Belarus, in practice, became involved in the war. On the other hand, the war has given the regime greater latitude, making it easier to punish individuals for actions such as donations (framed as financing terrorism) or anti-war positions (framed as justifying fascism).

As a result, we see a unique phenomenon in which the legal framework of an authoritarian regime creates a legally robust construct linking **extremism** and **terrorism** – robust precisely because it serves as a defensive mechanism for the autocracy. Surprisingly, however, there is little academic research directly examining the relationship between extremism and terrorism⁶. In practice, those labeled by the regime as “extremists” or so-called “terrorists” are generally direct victims of political terror carried out by the authorities.

Scholars in the field emphasise that **extremism** is a highly relative concept⁷, strongly shaped by political circumstances, while the term “terrorism” is commonly used in the political discourse of non-democratic regimes⁸. The same action can be understood either as a “struggle for justice” or as an “act of terror”, depending on your perspective. Moral evaluation always depends on the worldview, the political system, ongoing crises, or historical the context. This raises a key question: if the definition of extremism shifts so significantly depending on context, can it be meaningfully applied under legal norms, which are intended to be precise and leave little room for interpretation?

The case of Belarus provides a vivid example of this unique approach to these concepts. Following the protests,

⁶ R.M. Joyce, V.P. Fortna, *Extremism and Terrorism: Rebel Goals and Tactics in Civil Wars*, “Perspectives on Politics” 2025, vol. 23, no. 1, pp. 154–174, DOI: 10.1017/S1537592724000598.

⁷ M. Dono, M. Alzate, J.M. Sabucedo, *Slicing the Gordian Knot of Political Extremism: Issues and Potential Solutions Regarding Its Conceptualization and Terminology*, “Journal of Social and Political Psychology” 2024, vol. 12, no. 1, pp. 140–156, DOI: 10.5964/jspp.12989.

⁸ A.P. Schmid, *Defining Terrorism*, ICCT Report, March 2023, https://www.icct.nl/sites/default/files/2023-03/Schmidt%20-%20Defining%20Terrorism_1.pdf [15.12.2025], DOI: 10.19165/2023.3.01.

the lists of “extremists” and “terrorists” in Belarus have, figuratively speaking, grown exponentially. According to the human rights center Viasna, as of December 2025, the KGB and Ministry of Internal Affairs included 6,084 so-called “extremists” in their lists, and by early 2025, there were 257 “extremist formations”⁹. The regime has effectively turned any form of dissent or independent thinking into a synonym for “extremism”, stigmatising activists from pro-democracy movements and civil society as “extremists” or “terrorists”.

It should be noted that the repressive and punitive measures of the Belarusian regime extend far beyond the country’s borders, creating a precedent for transnational repression¹⁰. On 27 July 2022, amendments to the Criminal Procedure Code came into force in Belarus, introducing a special procedure for criminal prosecution – so-called “special proceedings”. This procedure applies to defendants who are outside the country and evade summons from the authorities conducting the criminal process. In practice, special proceedings are used to target citizens for their political views and active engagement against the dictatorial regime in Belarus. Although trials *in absentia* are recognised in the legal systems of various countries and are regulated by international standards, the Belarusian

⁹ *V 2024 godu priznali 89 “ekstremistskikh formirovaniy”, sredi nikh – media, teatral’naya truppa i obshchestvennye organizatsii* [In 2024, 89 “extremist formations” were recognized, including media, a theatre troupe, and public organizations], 8 January 2025, <https://spring96.org/ru/news/117097> [18.12.2025]; *V Belarusi novoye “ekstremistskoye formirovanie” – proyekt “Kastus”: khronika presledovaniya 12 dekabrya* [In Belarus, a new “extremist formation” – the “Kastus” project: persecution chronicle 12 December], 12 December 2025, <https://spring96.org/ru/news/119255> [18.12.2025].

¹⁰ N. Krawczyk, Y. Dzhibladze, *Transnational Repression in Belarus: A Brutal Tool of the Persecution of Dissent by the Lukashenka Regime*, iSANS Report, International Strategic Action Network for Security, September 2025, https://isans.org/wp-content/uploads/2025/09/transnational-repression-in-belarus_report-by-isans_september-2025.pdf [18.12.2025].

practice significantly departs from these norms. The systematic use of special proceedings without guarantees of a fair trial constitutes a serious violation of Belarus’s international human rights obligations¹¹.

The report below is an as-yet unpublished analytical paper from iSANS (The International Strategic Action for Network and Security), prepared by Natasza Krawczyk. It provides a timely analysis of how the Belarusian regime abuses mechanisms for countering terrorism and financial oversight, including the inclusion of regime-unfriendly individuals in government-maintained lists of “extremists” and “terrorists”. The author examines how the Belarusian authorities manipulate legislation to create “legal” conditions both domestically and within international organisations, bilateral agreements, and other frameworks. The report concludes with recommendations for foreign governments, emphasising the importance of measures to minimise the regime’s transnational repression – both practical and financial – against Belarusian citizens abroad.

¹¹ International Committee for Investigation of Torture in Belarus, *Prestupleniya net, a prigovor yest’: Spetsial’noye proizvodstvo kak instrument repressiy v Belarusi* [No Crime, but a Verdict Exists: Special Proceedings as an Instrument of Repression in Belarus], International Committee for Investigation of Torture in Belarus, 2025, <https://tortures-belarus2020.org/specprod/> [18.12.2025].

ABUSE OF THE COUNTER-TERRORISM AND FINANCIAL CONTROL FRAMEWORKS BY THE LUKASHENKA REGIME THROUGH THE INCLUSION OF TARGETED EXILED INDIVIDUALS IN THE GOVERNMENT-DRAWN LISTS OF “EXTREMISTS” AND “TERRORISTS”

Natasza Krawczyk (iSANS)

The Belarusian authorities systematically use legislation on combating terrorism and extremism to suppress dissent, including through transnational repression. There are several related government-drawn lists: the List of Organisations and Individuals Involved in Terrorist Activities, the List of Citizens of the Republic of Belarus, Foreign Citizens, and Stateless Persons Involved in Extremist Activities in the Republic of Belarus, the Republican List of Extremist Materials, and the List of Extremist Formations. These lists are regularly updated. Additions to these lists are extensive and often arbitrary.

Individuals and entities included “on” the “List of Organisations and Individuals Involved in Terrorist Activities”

are prohibited from conducting any financial transactions in Belarus, and their bank accounts are frozen¹². A range of restrictive measures applies to those on the “List of Citizens of the Republic of Belarus, Foreign Citizens, and Stateless Persons Involved in Extremist Activities in the Republic of Belarus”. In December 2022, the Belarusian parliament adopted amendments to the 2002 Law “On citizenship”¹³, which permit the revocation of citizenship of Belarusians residing abroad for “extremist activities” or “causing serious harm to the interests of Belarus”. These provisions explicitly targeted critics in exile, since the listed offences are often used in politically motivated persecutions, and trials often take place *in absentia* and without meaningful fair trial guarantees. United Nations officials condemned the amendments as constituting an abuse of counter-terrorist and counter-extremist legislation and policies¹⁴.

¹² Human Constanta, *Obzor bor'by s "ekstremizmom" v Belarusi za okt-yabr-dekabr 2023* [Overview of the Fight Against “Extremism” in Belarus for October–December 2023], 15 February 2024, <https://humanconstanta.org/obzor-borby-s-ekstremizmom-v-belarusi-za-oktyabr-dekabr-2023/> [29.10.2025].

¹³ *Zakon Respubliki Belarus' "O vnesenii izmeneniy v Zakon Respubliki Belarus' 'O grazhdanstve Respubliki Belarus'"* [Law of the Republic of Belarus “On Amendments to the Law of the Republic of Belarus ‘On Citizenship of the Republic of Belarus’”], 5 January 2023, Republic of Belarus, <https://president.gov.by/ru/events/vneseny-popravki-v-zakon-o-grazhdanstve-respubliki-belarus> [29.10.2025].

¹⁴ The UN Deputy High Commissioner for Human Rights, Nada Al-Nashif, noted that these changes in the legislation of Belarus create “a danger of the appearance of stateless persons” and “a large space for abuse”, see: *Statement on the situation of human rights in Belarus*, 22 September 2023, <https://www.ohchr.org/en/statements-and-speeches/2023/09/statement-situation-human-rights-belarus> [29.10.2025]. The abuse of anti-terrorist and anti-extremist legislation and policies to persecute peaceful critics of the regime was also noted in Report of the Special Rapporteur on the situation of human rights in Belarus, see: A. Marin, *Report of the Special Rapporteur on the situation of human rights in Belarus*, 25 August 2023, A/78/327, <https://reliefweb.int/report/belarus/report-special-rapporteur-situation-human-rights-belarus-anais-marin-a78327-enarruzh> [30.10.2025].

The “List of Organisations and Individuals Involved in Terrorist Activities”, as of 29 October 2025, contained 1,400 individuals, of whom 658 were Belarusian nationals¹⁵. Alongside individuals whose actions may genuinely threaten state security, the Belarusian authorities routinely include members of the Belarusian opposition and civil society. For instance, in April 2025, the Prosecutor General’s Office petitioned the Supreme Court to recognise the United Transitional Cabinet of the Belarusian Democratic Forces, together with all its structural divisions, as a terrorist organisation. The Prosecutor General’s Office alleged that the Cabinet’s activities were “supervised and funded by a number of neighbouring foreign countries” and that its principal objectives were “actions to plan, prepare, and commit attacks on the independence, territorial integrity, sovereignty, and public security of Belarus by seizing and retaining state power”. In July 2025, the Supreme Court granted the request, citing “evidence of elements of terrorist activity” in the actions of representatives of the United Transitional Cabinet “presented to the court”¹⁶. The United Transitional Cabinet had previously been recognised as an “extremist formation”¹⁷.

As of 14 November 2025, 5,989 persons were on the “List of Citizens of the Republic of Belarus, Foreign Citizens, and Stateless Persons Involved in Extremist Activities in the

¹⁵ *Eshche vos’merykh belarusov dobavili v spisok “terroristov”* [Another eight Belarusians were added to the list of “terrorists”], 29 October 2025, <https://news.zerkalo.io/life/112141.html> [30.10.2025].

¹⁶ *Ob’edinennyj perekhodnyj kabinet priznali “terroristicheskoy organizatsiyey” v Belarusi* [The United Transitional Cabinet was recognized as a “terrorist organization” in Belarus], 9 July 2025, <https://reform.news/obedinennyj-perekhodnyj-kabinet-priznali-terroristicheskoy-organizatsiej-v-belarusi> [30.10.2025].

¹⁷ *Kak “terroristicheskij” status povliayet na demsily Belarusi* [How the “terrorist” status will affect Belarusian democratic forces], 30 April 2025, <https://www.dw.com/ru/kak-terroristiceskij-status-povliayet-na-demsily-belarusi/a-72400112> [30.10.2025].

Republic of Belarus”¹⁸. Of these, 125 had been added to the list in October alone¹⁹.

3,152 individuals were added to the lists of terrorists and extremists in 2024²⁰. This was 72% more than in 2023, which was also a record. Of these, 2,232 were listed as “terrorists”, 920 as “extremists”, and, among them, 161 were minors, four of whom were born in 2010. In 2024, 89 new “extremist formations” appeared in Belarus²¹. The List of Extremist Formations, as of early November 2025, contained 316 entities²².

The inclusion of dissidents (or those perceived as such) on “terrorists” and “extremists” lists serves purposes that extend far beyond regulating their legal status within Belarus. It is used to locate those who have left the country and to secure their deportation to Belarus. While the Lukashenka regime increasingly resorts to extralegal methods, such as abduction (the most notorious case being the 2021 forced diversion of a Ryanair flight to arrest opposition journalist Raman Pratasevich and Sofia Sapega²³)

¹⁸ *V “spisok ekstremistov” dobavili yeshche 25 chelovek* [Another 25 people were added to the “list of extremists”], 14 November 2025, <https://reform.news/v-spisok-jekstremistov-dobavili-eshhe-25-chelovek> [30.10.2025].

¹⁹ *Human rights situation in Belarus. October 2025*, 6 November 2025, <https://spring96.org/en/news/119028> [1.11.2025].

²⁰ *V 2024 godu v perechen terroristov i ekstremistov Rosfinmonitoringa dobavili rekordnoe kolichestvo chelovek – bolee 3 tysyach* [In 2024, a record number of people – more than 3,000 – were added to the Rosfinmonitoring’s list of terrorists and extremists], 27 December 2024, <https://verstka.media/v-2024-godu-v-perechen-terroristov-i-ekstremistov-rosfinmonitoringa-dobavili-rekordnoe-kolichestvo-chelovek-bolee-3-tysyach> [1.11.2025].

²¹ *V Belarusi za god poyavilos’ 89 “ekstremistskikh formirovaniy”* [In Belarus, 89 “extremist formations” appeared over a year], 8 January 2025, Reform.news, <https://reform.news/v-belarusi-za-god-pojavilos-89-jekstremistskih-formirovanij> [1.11.2025].

²² *Human rights situation...*

²³ The actions of the Belarusian authorities, which forcibly landed a foreign civilian aircraft under the pretext of a fabricated terrorist threat were qualified by the International Civil Aviation Organisation as a gross violation of the norms of international civil aviation

and forced return²⁴, the majority of deportations are pursued through legal channels, including Interpol red notices and diffusions, bilateral and multilateral extradition proceedings, and other forms of interstate legal assistance, such as anti-money laundering and counter-terrorism financing frameworks.

The abuse of the Interpol system is based on fabricated criminal charges against targeted individuals, often under terrorism and extremism legislation, and is facilitated by insufficient initial scrutiny, limited funding for reviews, and a lack of transparency in rejections statistics or explanations.²⁵ While in some cases Interpol notices do not result in detention or extradition, they severely disrupt exiles' lives: opening bank accounts, applying for asylum, and travelling

law, endangering the lives of dozens of passengers and crew, see: *ICAO releases fact-finding report on forced landing of Ryanair plane in Belarus*, 18 January 2022, <https://en.belsat.eu/80485180/icao-releases-factfinding-report-on-forced-landing-of-ryanair-plane-in-belarus> [27.12.2025].

²⁴ Vasil Verameychyk, an ex-soldier of the Kalinouski regiment, was detained in Vietnam on 13 November 2024. The very next day, he found himself in Belarus. According to extradition lawyer Ales Mikhalevich, the extradition of Verameychyk was not a result of an extradition process but was carried out following an agreement between the Vietnamese and Belarusian security forces. "If he had truly been detained in a criminal case, then such a quick extradition would not have happened", Mikhalevich alleged, see: „*Nakhodilsya v razrabotke. Pochemu Vietnam tak bystro vydal belarusa i kak ponyat, chto strana opasna dlya poezdok – sprosil u yuristov* ["Was under investigation". Why Vietnam quickly extradited a Belarusian and how to understand that a country is unsafe for travel – we asked lawyers], 21 November 2024, <https://news.zerkalo.io/economics/83939.html> [1.11.2025].

²⁵ Belarus has been accused of abusing its membership in Interpol by the Lithuanian Foreign Minister, who proposed to limit its rights, since "the international community cannot tolerate the abuse of the Interpol channel for the prosecution of citizens of both its own country and other countries for political purposes", see: *Ministrė A. Bilotaitė: Interpolas negali būti politiniu įrankiu priešiško režimo rankose* [Minister A. Bilotaitė: Interpol cannot be a political tool in the hands of hostile regimes], 29 November 2023, <https://vrm.lrv.lt/lt/naujienos/ministre-a-bilotaite-interpolas-negali-buti-politiniu-irankiu-priesisku-rezimu-rankose/> [1.11.2025]. This call, however, has not yet led to practical results.

become extremely difficult. They can also prevent a person from legally staying in the chosen country or from potentially entering it. Appeals against the search warrant can take years²⁶. An added value of using Interpol for repressive regimes is that the transmission of data through it confers a veneer of credibility on the accusations, which regime-controlled media exploit to portray opposition figures as members of “international criminal and terrorist organisations” who threaten stability not only in their home state but also in the countries where they reside²⁷.

Within the expanding framework of interstate cooperation in criminal matters, particularly combating organised crime, terrorism, money laundering, and tax evasion, Belarus enjoys its closest partnership with Russia, which grants 80% of extradition requests from Belarus²⁸. Cooperation extends to mutual support in prosecutions and database sharing within the Commonwealth of Independent States framework, where Belarusians are automatically added to Russian wanted lists, thereby suspending statutes of limitations. The level of interaction between Belarus and Russia is increasing. Currently, they are working on combining their respective national lists of “extremists” and “extremist resources”²⁹, which means that Russia will be able

²⁶ *Uncorrected oral evidence: Transnational Repression in the UK (HC 681)*, Joint Committee on Human Rights, Houses of Parliament, 12 March 2025, p. 8, <https://committees.parliament.uk/oralevidence/15739/html/> [3.11.2025].

²⁷ S. Furstenberg, E. Lemon, J. Heathershaw, *Spatialising State Practices Through Transnational Repression*, “European Journal of International Security” 2021, no. 6, p. 372.

²⁸ D.V. Bernstein, *V RF po zaprosu Minska zaderzhan doktor Martov. Chto dalshe?* [In Russia, Dr. Martov detained at Minsk’s request. What next?], 16 May 2024, <https://www.dw.com/ru/v-rossii-po-zaprosu-minska-zaderzan-doktor-martov-cto-budet-dalse/a-69102688> [3.11.2025].

²⁹ *Povodov dlya presledovaniya stanet bol’she: Belarus’ i Rossiya khotyat obedinit’ spiski “ekstremistov” i “ekstremistskikh resursov”* [There will be more grounds for persecution: Belarus and Russia want to unify lists of “extremists” and “extremist resources”], 6 February 2024, <https://belsat.eu/ru/news/06-02-2024-povodov-dlya-presledovaniya>

to prosecute persons on Belarusian lists without additional requests from Belarus. In April 2025, Vladimir Putin and Alyaksandr Lukashenka discussed enhanced counter-terrorism cooperation between their security services³⁰. This suggests a further synchronisation of transnational repression practices in the near future to fight dissent under the pretext of combating terrorism and extremism.

Russia is not the only state that provides information about persons located on its territory and extradites them to Belarus at its request. In July 2025, the Tbilisi Court of Appeals upheld the refusal of political asylum to Belarusian human rights defender Raman Kislak, citing “sufficient grounds to believe that his presence runs counter to the country’s interests”. The activist was ordered to leave Georgia³¹. As his passport has expired, Kislak’s only destination option is Belarus, where he will most certainly face politically-motivated persecution, as Belarusian authorities accuse him of terrorism, high treason, and conspiracy to seize power in connection with his human rights activities. These criminal charges carry the death penalty as the maximum sentence³².

Return to Belarus and subsequent criminal prosecution are not the sole objectives of including targeted exiled individuals on the government-drawn lists of “extremists” and “terrorists”. The Lukashenka regime systematically weaponises financial-control frameworks to create serious

-stanet-bolshe-belarus-i-rossiya-hotyat-obedinit-spiski-ekstremistov-i-ekstremistskih-resursov [3.11.2025].

³⁰ *Putin i Lukashenko obsudili sotrudnichestvo spetsluzhb v bor'be s terrorizmom* [Putin and Lukashenka discussed cooperation of intelligence services in combating terrorism], 8 April 2025, <https://www.kommersant.ru/doc/7639900> [3.11.2025].

³¹ Kislak plans to appeal the department’s decision in Georgia and to report the incident to the UN Human Rights Committee, which in August ordered Georgia not to deport him to Belarus until his case has been reviewed, see: *Georgia denies Belarusian rights advocate Kišlak asylum seeker certificate*, 17 September 2025, <https://pozirk.online/en/news/156023/> [7.11.2025].

³² *Georgia denies asylum to Belarusian activist Kišlak*, 11 July 2025, <https://pozirk.online/en/news/146356/> [7.11.2025].

obstacles to the daily lives and economic activities for thousands of exiles.

Recognition of a person as a “terrorist” or “extremist” triggers automated alerts in global compliance databases. These databases, maintained by providers such as *LexisNexis*, *Sumsub*, *Dow Jones Risk & Compliance*, and *LSEG*, incorporate national sanctions lists, politically exposed persons, and adverse media mentions. They are consulted by financial institutions during customer due diligence. The process is 95–99% automated. Algorithms scan news, court decisions, and government websites. When an individual’s status changes, banks receive notifications flagging “association with terrorism”³³. Without further clarification of the circumstances of inclusion of an individual on lists of “extremists” and “terrorists”, banks demand additional documentation, restrict even the most innocuous transactions, or close accounts altogether, not wanting to deal with the “problematic client from the list”³⁴. Representatives of *LSEG* and *LexisNexis* have confirmed that they incorporate data from jurisdictions where courts may render politically motivated rulings, but emphasised that the decision on how to use it is made by the client banks³⁵. They also noted that individuals can send additional information about themselves to be included in their “profile”.

The case of Dzmitri Navosha, co-founder of the *Tribuna* media project, who was sentenced to 12 years of imprisonment *in absentia* in Belarus under political charges, illustrates that the inclusion of additional information in

³³ A. Prokopenko, *Spiski bez granits. Kak Kreml' ispol'zuet dlya repressiy finansovuyu sistemu Zapada* [Lists without borders: How the Kremlin uses the Western financial system for repression], *Carnegie. Politika*, 10 November 2025, <https://storage.googleapis.com/crng/russia-eu-banking-exploits.html> [11.11.2025].

³⁴ *Ibid.*

³⁵ O. Loginov, *Kak banki ES blokiruyut scheta grazhdan Rossii i Belarusi* [How EU banks block the accounts of Russian and Belarusian citizens], 12 November 2025, <https://www.dw.com/ru/kak-banki-es-blokiruyut-scheta-grazhdan-rossii-i-belarusi/a-74692230> [13.11.2025].

a “profile” is not always possible. After being recognised as a terrorist, Navosha and his company faced severe restrictions across Europe, the United Kingdom, and the United States; transactions from American banks were completely blocked, some accounts in Europe were closed, and protracted negotiations were required to unfreeze others³⁶. Although some providers eventually incorporated the explanatory materials Navosha submitted, others, including *Dow Jones Risk & Compliance*, refused to do so. The British regulator, the Information Commissioner’s Office (ICO), which was also approached by Navosha’s lawyers, declined to intervene, stating that, despite concerns about the judicial system in Belarus, it could not challenge foreign court decisions and that Navosha himself should appeal the verdict³⁷.

Hundreds, if not thousands, of Belarusian exiles face comparable obstacles of varying severity. The continuous expansion of the government-drawn lists of “extremists” and “terrorists” ensures a steady flow of new “high-risk” alerts into global compliance systems, rendering ordinary financial life effectively impossible for those affected.

It should be noted that the practice of using “terrorist” lists for transnational persecution of those who were forced to leave Belarus, alongside other tools of transnational repression³⁸, was adopted from Russia. The Russian list of “terrorists and extremists” maintained by Rosfinmonitoring grows by 250–300 entries per month. As of the end of 2024, there were more than 20,000 names on the list, many added for political reasons³⁹. Unless robustly countered,

³⁶ “*Na Zapade schitayut adekvatnym predstavlyat’ menya tak: ‘Dmitriy, terrorist, vot prof ot KGB’*” [In the West, they consider it appropriate to present me like this: “Dmitriy, terrorist, here’s KGB proof”], 21 October 2025, <https://gazetaby.com/post/na-zapade-schitayut-adekvatnym-predstavlyat-menya-tak-dmitrij-terroris/210133/> [13.11.2025].

³⁷ A. Prokopenko, op. cit.

³⁸ N. Krawczyk, Y. Dzhibladze, op. cit.

³⁹ A. Prokopenko, op. cit.

this tactic, which has proven to be an effective method of persecuting dissent around the world, risks proliferation among other authoritarian regimes.

To oppose the Lukashenka regime's abuse of counter-terrorism and the financial-control frameworks, financial institutions, compliance-providers, and counter-terrorism agencies must be systematically provided with information about the manipulation of "terrorists" and "extremists" lists by Belarus. This information should be taken into consideration whenever a decision is taken to freeze assets, deny services, or block transactions involving listed individuals. Furthermore, existing anti-money laundering, countering the financing of terrorism, and compliance standards should be amended to require verification of the likely political motivation behind Belarusian extremism and terrorism lists before adverse action is taken, thereby protecting victims of transnational repression while preserving the integrity of the global financial system.

Recommendations for governments:

- raise awareness among international organisations, financial institutions, and states of the use of tools of transnational repression by the Lukashenka regime, in particular the politically motivated inclusion of individuals on the lists of terrorists and extremists;
- strengthen resilience against the use of spurious terrorism and extremism charges against Belarusian nationals;
- actively pursue further reforms of Interpol and other mechanisms of international cooperation to prevent their abuse for political purposes;
- support Interpol by promptly complying with decisions of the Commission for the Control of Interpol's Files by deleting data in national databases when a red notice or a diffusion has been found to be politically motivated;
- apply additional vetting to red notices and diffusions originating from the Lukashenka regime;

- resist and oppose abuse of international mechanisms of cooperation on criminal matters by the Lukashenka regime as part of its TNR actions; in particular, deny requests for extradition of Belarusian nationals at risk of politically motivated persecution;
- review, and, where appropriate, suspend or terminate existing bilateral and multilateral agreements with Belarus on extradition, mutual legal assistance, readmission, deportation, and intelligence-sharing;
- issue guidance to domestic financial institutions and counter-terrorism agencies to take into account the practices of abuse by the Lukashenka regime of international financial-control and counter-terrorist-financing mechanisms by the Lukashenka regime when deciding whether to freeze assets, deny services, or block transactions involving individuals included on “terrorist” or “extremist” lists;
- advocate within the Financial Action Task Force for the introduction of amendments or interpretive guidance to its compliance and anti-money laundering standards that would require financial institutions to verify the likelihood of political motivation behind an individual’s inclusion on “terrorist” or “extremist” lists before implementing restrictive measures;
- reflect information on transnational repression by Belarus in country reports on human rights and report it in communication with inter-governmental organisations;
- undertake a coordinated effort with like-minded states to establish cooperation between government agencies dealing with transnational repression.

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