

“Europe’s Last Dictator”: Police Brutality and Human Rights Violations in Belarus

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“Lukashenko is not a Stalin, but he’s certainly Stalin’s ideological grandson. In his attempt to build a mini Soviet Union, he has made a regime built on fear.”¹

- Anatoly Lebedko

I. Introduction

The power Alyaksandr Lukashenka has maintained over the Belarusian people for the past twenty-six years appears to be weakening due to the aftermath of the 2020 presidential election.² The world previously gave Lukashenka a moniker to describe his rule of Belarus—“Europe’s last dictator”—a stab at the country’s Soviet Union past.³ After the fall of the former Soviet Union in 1992,⁴ Belarus held its first presidential election in 1994, electing Lukashenka with over eighty percent of the vote in the run-off election.⁵ After only two years, Lukashenka sought an expansion of his powers as President.⁶ The referendum of 1996 eliminated the elected parliament system and established a new bicameral legislative chamber with members appointed by the President.⁷ The

¹ ‘Little Stalin’ Tightens Grip on Belarus, TELEGRAPH (Oct. 16, 2004), <https://www.telegraph.co.uk/news/worldnews/europe/belarus/1474299/Little-Stalin-tightens-grip-on-Belarus.html> [<https://perma.cc/N939-N8BT>]. The Belarusian President’s name has two different spellings: Alyaksandr Lukashenka and Alexander Lukashenko. See Filip Noubel & Maxim Edwards, *Lukashenka or Lukashenko? Why Anglophone Media Use Different Spellings for the Embattled Belarusian Leader*, GLOBAL VOICES (Aug. 20, 2020), <https://globalvoices.org/2020/08/20/lukashenko-or-lukashenka-why-international-media-use-different-spellings-for-belarus-embattled-leaders-name/> [<https://perma.cc/K923-VEZ2>].

² See Anders Aslund, *Europe’s Last Dictator: The Rise and (Possible) Fall of Alyaksandr Lukashenko*, ATL. COUNCIL (Aug. 9, 2020), <https://www.atlanticcouncil.org/blogs/ukrainealert/europes-last-dictator-the-rise-and-possible-fall-of-alexander-lukashenko/> [<https://perma.cc/2FCP-QSWU>].

³ *Id.*

⁴ Hollie McKay, *Who is Belarus President Alexander Lukashenko, ‘Europe’s Last Dictator’?*, FOX NEWS (Aug. 17, 2020), <https://www.foxnews.com/world/who-is-europes-last-dictator-alexander-lukashenko> [<https://perma.cc/Q4SZ-SMPA>].

⁵ USTINA MARKUS, THE COLOUR REVOLUTIONS IN THE FORMER SOVIET REPUBLICS: SUCCESSES AND FAILURES 119 (Donnacha Ó Beacháin & Abel Polese eds., 2010).

⁶ *See id.*

⁷ *See International Fact-Finding Mission: Conditions of Detention in the Republic of Belarus*, Org. Sec. Co-operation Eur. 4 (Oct. 1, 2008), <https://www.osce.org/files/f/documents/7/d/33759.pdf> [hereinafter *Conditions in Belarus*]; see, e.g., Markus, *supra* note 5, at 119 (“[O]nly deputies loyal to [Lukashenka] obtain[ed] seats.”).

new governmental system essentially eliminated any representatives of opposition parties from the Government and gave Lukashenka “quasi-dictatorial powers.”⁸ Among the powers afforded to Lukashenka through the 1996 referendum was the power to issue decrees which had the force of law in circumstances of “specific necessity and urgency.”⁹ Although the Belarusian people sought to establish a democratic state with the 1994 election of Lukashenka, the path to democratization in Belarus ceased to exist after his rise to power.¹⁰

Lukashenka retained power in Belarus through “manipulated elections and arbitrary decrees.”¹¹ Lukashenka’s control over the economy, similar to the old Soviet economic system, as well as control over the media and repression of political opponents, supported his abundant power.¹² Due to Lukashenka’s utter disregard for both the Belarus Constitution and international law, the country is “isolated [from] the international community.”¹³ Additionally, since the 1994 election, each presidential election has fallen “short of international standards,” complicating relationships with western countries.¹⁴ In response to Lukashenka’s consolidation of power and antidemocratic decrees, the United States and European Union limited economic aid to Belarus.¹⁵ However, the international community is not alone in their stride to oust Europe’s last dictator—the Belarusian people often take to the

⁸ *Republic of Belarus Violations of Academic Freedom: Background*, 11 HUM. RTS. WATCH 2, 9 (July 1999), <https://www.hrw.org/legacy/reports/1999/belarus/Belrus99-04.htm> [<https://perma.cc/TLB2-44KJ>] [hereinafter *Republic of Belarus Background*].

⁹ Mark Lenzi, *Lost Civilization: The Thorough Repression of Civil Society in Belarus*, 10 J. POST-SOVIET DEMOCRATIZATION 401, 411 (2002).

¹⁰ NELLY BEKUS, *STRUGGLE OVER IDENTITY: THE OFFICIAL AND THE ALTERNATIVE “BELARUSIANNES”* 90 (Central European Univ. Press 2010) (“If we use Dawisha’s reasoning that ‘democratization is said to begin when the first set of free and fair elections for national level office take place,’ then the first presidential election in Belarus . . . [should] signify an introduction of democratization in the new history of Belarus.”).

¹¹ U.S. Dep’t of St., Bureau of Democracy, H.R. and Lab., *Belarus 2016 Human Rights Report 1* (2016) [hereinafter U.S. Dep’t of St. 2016 Report].

¹² Aslund, *supra* note 2; see Lenzi, *supra* note 9, at 411 (“Lukashenko’s total consolidation of power not only led the country into economic ruin and international isolation but provided one man the political power to commit gross violations of human rights and obliterate civil society in Belarus.”).

¹³ *Republic of Belarus Background*, *supra* note 8.

¹⁴ U.S. Dep’t of St. 2016 Report, *supra* note 11, at 1.

¹⁵ *Republic of Belarus Background*, *supra* note 8.

streets to publicly express opposition to Lukashenka.¹⁶ Unfortunately, these protests do not come without violence towards the peaceful demonstrators. In fact, “arbitrary and violent arrests . . . have become commonplace during peaceful protests in Belarus.”¹⁷ The recent 2020 election was no exception to the violence towards protestors.¹⁸

This note will address the ongoing human rights abuses in Belarus due to the authoritarian rule of Alyaksandr Lukashenka. In particular, this note will discuss the recent 2020 Belarusian Presidential election, the Lukashenka-led government response, and potential legal ramifications. Part II will explore the events leading up to the 2020 Belarus Presidential election and the election results. Part III will provide an overview of the Belarus Constitution and the enumerated rights and freedoms of citizens. Part IV will examine Belarus’ international obligations through their United Nations membership and ratification of specific human rights treaties. Part V will examine the European Union’s new global human rights sanctions regime and discuss how this framework could affect Belarus. Finally, this note will conclude that the human rights abuses in Belarus, including the recent mistreatment towards peaceful protestors of the 2020 election, violate not only the Belarus Constitution but also Belarus’ international obligations.

II. Background

Although Lukashenka’s rule previously dealt with criticisms of his presidential wins,¹⁹ his position as President seemed secure until the 2020 presidential election campaign began.²⁰ Sergei Tikhanovsky rose as a potential political candidate opposite of

¹⁶ *See id.*

¹⁷ *Id.*

¹⁸ *See e.g.*, Elizaveta Fokht, Anna Pushkarskaya & Oksana Chizh, ‘If You Croak We Don’t Care’: Brutality in Belarus, BBC NEWS, <https://www.bbc.com/news/world-europe-53776461> [<https://perma.cc/737A-QNB4>] (detailing the accounts of victims caught in the violence of 2020 election protests).

¹⁹ Franak Viačorka, *How Post-Election Protests Are Creating a New Belarus*, ATL. COUNCIL (Sept. 22, 2020), <https://www.atlanticcouncil.org/blogs/ukrainealert/how-post-election-protests-are-creating-a-new-belarus/> [<https://perma.cc/EUA5-WUGP>] (“[O]utcries over rigged votes were nothing new in Lukashenka’s Belarus, but they had never previously amounted to much.”).

²⁰ Aslund, *supra* note 2.

Lukashenka for the 2020 election.²¹ As a popular YouTuber who uses his social media presence to put the “dysfunctional post-Soviet bureaucracy” on display for the world, the media considered Sergei as the primary opponent to Lukashenka.²²

On May 9th, 2020, Tikhanovsky was arrested and charged with disturbance of public disorder and illegal demonstrations before he could officially declare his candidacy.²³ One of the requirements to be President per Article 80 of the Belarus Constitution is that the individual must be “eligible to vote.”²⁴ Article 64 of the Constitution states that an individual cannot partake in elections if the citizen has been “held in places of confinement in accordance with the verdict of a court.”²⁵ Sergei was therefore declared ineligible to run due to his criminal record.²⁶ Although two top presidential contenders were jailed before announcing their candidacy, and one was denied registration as a candidate, hope was not lost for the Belarusian people to elect a new president.²⁷ Svetlana Tikhanovskaya, Sergei’s wife, decided to run for President and quickly became Lukashenka’s fiercest rival.”²⁸

21 *Who is Sergei Tikhanovsky, the Husband of the Opposition Candidate in Exile?*, ARCHYDE (Aug. 17, 2020), <https://www.archyde.com/who-is-sergei-tikhanovsky-the-husband-of-the-opposition-candidate-in-exile/> [https://perma.cc/QY4V-M64G] [hereinafter *Sergei Tikhanovsky*] (“[Sergei] opposed to(sic) the Belarusian President Alexander Lukashenko, . . . propelled Svetlana Tikhanovskaya, his wife, to the forefront of the political scene in just a few months.”).

22 *Id.*

23 *Id.*; Patrick Reeve, *Dozens Arrested in Belarus Amid Unusual Signs of Political Unrest*, ABC NEWS (June 20, 2020), <https://abcnews.go.com/International/dozens-arrested-belarus-amid-unusual-signs-political-unrest/story?id=71349500> [https://perma.cc/R68G-34U6].

24 Constitution of the Republic of Belarus of 1994, Mar. 15, 1994, art. 80 (as amended by the republican referendums on Nov. 24, 1996 and Oct. 17, 2004). The full text of the Constitution in English is available at: <https://www.wipo.int/edocs/lexdocs/laws/en/by/by016en.pdf> (accessed Oct. 14, 2020) [hereinafter *Belarus Const.*].

25 *Belarus Const.*, art. 64.

26 *See Sergei Tikhanovsky, supra* note 21.

27 Robyn Dixon, *Belarus’s Lukashenko Jailed Election Rivals and Mocked Women as Unfit to Lead. Now One is Leading the Opposition*, WASH. POST (July 23, 2020), https://www.washingtonpost.com/world/europe/belarus-lukashenko-opposition-election/2020/07/23/86f231f6-c5ca-11ea-a825-8722004e4150_story.html [https://perma.cc/58BW-4VSN].

28 Megan Specia, *Who is Svetlana Tikhanovskaya, Belarus’s Unlikely Opposition Leader?*, N.Y. TIMES (Aug. 13, 2020), <https://www.nytimes.com/2020/08/13>

Tikhanovskaya immediately became popular among Belarusian citizens. Voters were drawn to Tikhanovskaya as she advocated for a change to the economic system and opposed Lukashenka's authoritarian rule.²⁹ Lukashenka never attempted to have her arrested as he "never took her seriously."³⁰ Although she gained mass support, Lukashenka was declared the winner with eighty percent of the vote in what is now known as a widely disputed election result.³¹ In response to the election results, the largest gathering in Belarus erupted on August 16th, 2020.³² Over 200,000 people marched together to protest yet another suspicious election.³³ Tikhanovskaya fled to Lithuania due to pressure by the Belarusian government.³⁴ Her retreat to Lithuania led her supporters to flood the streets, demanding "the resignation of Lukashenko, the release of political prisoners, and an end to police brutality."³⁵

For over two months, peaceful protestors have faced harsh punishments for refusing to accept the election results.³⁶ Although there were post-election protests after the 2006 and 2010 presidential elections, the police repression following this election has been "far more violent" and intense.³⁷ Police brutality and arbitrary detention of peaceful protestors have only fueled political outrage.³⁸ Police have killed at least three people, and over 7,000

/world/europe/belarus-opposition-svetlana-tikhanovskaya.html [https://perma.cc/3VUY-J8PN].

²⁹ *See id.*

³⁰ *Id.*

³¹ *See* Alan Taylor, *Anger and Protest Over a Presidential Election in Belarus*, ATLANTIC (Aug. 20, 2020), <https://www.theatlantic.com/photo/2020/08/photos-anger-and-protest-over-presidential-election-belarus/615451/> [https://perma.cc/VDV2-R3TL].

³² Tatsiana Kulakevich, *Belarus, Explained: How Europe's Last Dictator Could Fall*, CONVERSATION (Aug. 20, 2020), <https://theconversation.com/belarus-explained-how-europes-last-dictator-could-fall-144711> [https://perma.cc/DX93-W422].

³³ *Id.*

³⁴ *See* Specia, *supra* note 28.

³⁵ *Id.*

³⁶ *See e.g.*, Fokht, Pushkarskaya & Chizh, *supra* note 18 ("Victims of police brutality in Belarus have told the BBC about their experiences of the crackdown after the disputed re-election of President Alexander Lukashenko.").

³⁷ Kulakevich, *supra* note 32.

³⁸ Interior Minister Yury Karayeu "confirmed that some of the detainees did not face charges." *Human Rights Situation in Belarus: August 2020*, VIASNA, <http://spring96.org/en/news/99352> [https://perma.cc/PA5U-GS2A] (last visited Dec. 8, 2020) [hereinafter *Human Rights Belarus*].

people have been arrested—many facing brutal beatings and torture while in custody.³⁹ Belarusian police have beaten protestors with batons, kicked protestors, and used water cannons against the peaceful protestors.⁴⁰ While over eighty criminal proceedings have been filed against peaceful protestors under Article 293 of the Criminal Code (mass riots), no cases have been opened against any law enforcement officer despite clear evidence of injuries sustained during the protests.⁴¹ The mass protests in Belarus are not subsiding, and with each new day of protests, more and more protestors are being brutally detained by the Lukashenka-led police force.⁴² After decades of violations of Belarusian law and international treaties, the citizens of Belarus deserve new leadership. Their advocacy for free and fair elections should not go unnoticed, and the end of Lukashenka's rule must be near.

III. The Belarus Constitution

The Belarus Constitution of 1994, with amendments in 1996 and 2004, is the fundamental authority of law.⁴³ The Constitution's drafters, the Constitutional Commission of the Belarusian Supreme Soviet, sought to create a democratic state⁴⁴ and wanted to ensure that the provisions in the Constitution "were not part of the Communist legal order."⁴⁵ The Constitution establishes the framework of the Belarusian Government and details the human

³⁹ See *id.*

⁴⁰ Taylor, *supra* note 31. For eyewitness descriptions of the mistreatment of protestors by police following the 2020 election, see Fokht, Pushkarskaya & Chizh, *supra* note 18.

⁴¹ See Sophie Athénère, *Belarus One Month After the Election: "It is the Music of a People Who Will Not Be Slaves Again"*, INT'L OBSERVATORY HUM. RTS. (Sept. 9, 2020), <https://observatoryihr.org/blog/it-is-the-music-of-a-people-who-will-not-be-slaves-again-belarus-one-month-after-the-election/> [https://perma.cc/X7FS-XAWL] ("There is no separation of powers in Belarus, which is why the Belarusian prosecutors avoid initiating criminal proceedings against security force staff."); see *Human Rights Belarus*, *supra* note 38 ("[A]t least 500 cases of torture have been recorded and documented by the Human Rights Center 'Viasna'.").

⁴² See Athénère, *supra* note 41.

⁴³ See Constitution of the Republic of Belarus of 1994, Mar. 15, 1994.

⁴⁴ Gary M. Shaw, *The Constitution of Belarus: A Good First Step Towards the Rule of Law*, 6 TOURO INT'L L. REV. 125, 125 (1995).

⁴⁵ Alexander Lukashuk, *The New Draft Constitution of Belarus: A Shaky Step Toward the Rule of Law*, 2 E. EUR. CONST. REV. 17, 17 (1993).

rights and freedoms of its citizens.⁴⁶ The document is separated into nine different sections, with each section containing several articles.⁴⁷ Section II is labeled “The Individual, Society and the State,” mainly covering individual rights, as well as the duties of the Government.⁴⁸ Notable among the rights listed in Section II are the prohibitions against torture, other cruel and inhuman punishment,⁴⁹ and guarantees of freedom of expression⁵⁰ and assembly.⁵¹ Even though the Constitution specifically lays out seemingly extensive protections for fundamental human rights, other provisions, including Article 23 and Article 63, provide for the potential dissolution of these rights.⁵²

Even with the protections listed in the Constitution—created with the intention of a democratic state—the rights of the Belarusian citizens are constantly violated. When police use excessive force against protestors or beat citizens during an arrest, Article 25 of the Constitution is violated.⁵³ When citizens organize a peaceful demonstration and the Government forces them to disperse, Article 35 of the Constitution is violated.⁵⁴ The Lukashenka-led Belarusian Government consistently violates the fundamental rights of the Belarusian population.⁵⁵ More specifically, the Belarusian people have been tortured, had their speech suppressed, and have been prohibited from peaceful assembly—all amounting to clear violations of the Belarus Constitution by the Government.⁵⁶

⁴⁶ See generally Belarus Const.

⁴⁷ See *id.*

⁴⁸ See *id.* at § 2; see Shaw, *supra* note 44, at 126.

⁴⁹ Belarus Const. § II, art. 25.

⁵⁰ Belarus Const. § II, art. 33.

⁵¹ Belarus Const. § II, art. 35.

⁵² Shaw, *supra* note 44, at 130-31 (“[T]he provisions in Article 23 [which] allow[] the Supreme Council to pass legislation restricting citizens’ civil liberties are extremely broad . . . the civil liberties . . . would appear to be subject to abridgment.”); see also Belarus Const. § II, arts. 23 & 63.

⁵³ See Belarus Const. § II, art. 25.

⁵⁴ See Belarus Const. § II, art. 35.

⁵⁵ See U.S. Dep’t of St., Bureau of Democracy, H.R. and Lab., 2019 Country Reports on Human Rights Practices: Belarus at 1 (2020) (listing the large number of “[s]ignificant human rights issues”) [hereinafter U.S. Dep’t of St. 2019 Report].

⁵⁶ See *id.* at 2, 10, 15.

A. Prohibition on Torture Practices in the Belarus Constitution

Article 25 of the Constitution provides that “[n]o one shall be subjected to torture or cruel, inhuman or undignified treatment or punishment”⁵⁷ However, even with the explicit prohibition against such practices, the Belarusian Government continues to commit abuses against its citizens.⁵⁸ The U.S. Department of State reports state that the Committee for State Security (“KGB”), riot police, and other security forces continually beat detainees.⁵⁹ Additionally, it has become common for police to beat criminal suspects and citizens during an arrest—often such arrests are arbitrary.⁶⁰

Following the August 9th, 2020 presidential election, and subsequent peaceful protests, thousands of Belarusian citizens have been subjected to torture.⁶¹ Victims of police brutality have described beatings, electric shocks, being forced into prolonged stress positions, and even rape.⁶² Some have been hospitalized for sustained injuries, while others have reported serious injuries like broken bones, skin wounds, and kidney damage.⁶³ These victims have not only been tortured on the streets for their peaceful protests, but once they are taken to the detention centers, they receive more mistreatment.⁶⁴ Additionally, some detainees were reportedly

⁵⁷ Belarus Const. § II, art. 25.

⁵⁸ See Fokht, Pushkarskaya & Chizh, *supra* note 18.

⁵⁹ U.S. Dep’t of St. 2016 Report, *supra* note 11, at 3.

⁶⁰ See *id.* at 1.

⁶¹ See, e.g., *Belarus: Systematic Beatings, Torture of Protestors*, HUM. RTS. WATCH (Sept. 15, 2020), <https://www.hrw.org/news/2020/09/15/belarus-systematic-beatings-torture-protesters> [<https://perma.cc/8TVJ-XM2S>]; Dan Peleschuk, *I Spent Two Terrifying Days Imprisoned in Belarus*, BUZZFEED NEWS (Aug. 16, 2020), <https://www.buzzfeednews.com/article/danpeleschuk/belarus-detention-centers-abuse-lukashenko-protests> [<https://perma.cc/Z98U-G8D8>] (describing one man’s arrest and detention after being approached by police for simply walking in an area near a recent protest of the 2020 presidential election).

⁶² See *Belarus: Systematic Beatings, Torture of Protestors*, *supra* note 61; see also Peleschuk, *supra* note 61.

⁶³ See *Belarus: Systematic Beatings, Torture of Protestors*, *supra* note 61 (“Some [victims] were arrested as they took part in demonstrations that they described as peaceful; others were grabbed off the streets or from their cars.”).

⁶⁴ Aleksei Alekdandrov, Alina Pinchuk & Tony Wesolowsky, ‘At Night The Screaming Began’: Firsthand Account of Torture at Minsk Detention Center, RADIO FREE

“forced to kneel for hours on the concrete floor with their foreheads bowed to the ground.”⁶⁵ Furthermore, these detainees have been subjected to mental anguish.⁶⁶ There have been reports from former detainees that the detention centers have become “torture chambers” for citizens whose “only ‘crime’ was to take to the streets in peaceful protest” of a president that has taken advantage of his power.⁶⁷

Although the Constitution does not lay out what constitutes torture, Article 25 includes “cruel, inhuman or undignified treatment or punishment.”⁶⁸ It is clear from the reports of protestors that the mistreatment suffered on the streets and in the detention centers amounts to cruel, inhuman, or undignified treatment as reports list numerous physical injuries sustained by the police. Thus, by allowing this mistreatment, the Government violates the Constitution’s express prohibition against torture or cruel, inhuman, or undignified treatment or punishment.

B. Freedom of Expression Rights in the Belarus Constitution

In addition to the violations of the prohibition against torture, the government also attacks its citizens’ rights to freedom of expression.⁶⁹ Article 33 of the Constitution provides that “[e]veryone is guaranteed freedom of thoughts and beliefs and their free expression.”⁷⁰ Additionally, Article 33 stipulates that a citizen should not be forced to deny their beliefs and mass media should be censored.⁷¹ To prevent the Belarusian public and the outside world from seeing the oppression of their people, Belarus has “suppressed

EUR. RADIO LIBERTY (Aug. 18, 2020), <https://www.rferl.org/a/firsthand-account-of-torture-at-minsk-detention-center/30790313.html> [<https://perma.cc/X65W-JQYZ>].

⁶⁵ *Id.*

⁶⁶ *See id.* (“These situations didn’t always end in beatings, but every word we uttered was met by insults and humiliation.”).

⁶⁷ *Belarus: Mounting Evidence of a Campaign of Widespread Torture of Peaceful Protestors*, AMNESTY INT’L (Aug. 13, 2020), <https://www.amnesty.org/en/latest/news/2020/08/belarus-mounting-evidence-of-a-campaign-of-widespread-torture-of-peaceful-protesters/> [<https://perma.cc/NDL8-KUDB>].

⁶⁸ *See* Belarus Const. § II, art. 25.

⁶⁹ *See* Tom Lynch, *Belarus Government Hinders Freedom of Expression*, 6 HUM. RTS. BRIEF 25, 25 (1999).

⁷⁰ Belarus Const. § II, art. 33.

⁷¹ *Id.*

freedom of expression online and offline.”⁷² Not only do Belarusian authorities detain and abuse both journalists and peaceful protestors, but they also censor the media by blocking access to independent media and opposition websites.⁷³ Additionally, governmental authorities cut off access to the internet immediately after announcing the election results in an attempt to deprive their citizens of the ability to seek information—another clear example of the government violating their citizens’ freedom of expression rights.⁷⁴

After evaluating Belarus over the past few years, reports from the U.S. Department of State have determined that the government has repeatedly violated their citizens’ freedom of expression rights provided by their constitution.⁷⁵ According to the 2019 U.S. Department of State report, governmental authorities have prohibited displaying certain historical flags and symbols that are construed as a threat to the Lukashenka-led Government or public order.⁷⁶ The citizens of Belarus have systematically had their freedom of expression rights violated throughout Lukashenka’s rule, but violations of these rights have dramatically increased throughout the 2020 presidential election cycle.⁷⁷ The Belarusian Government is violating their citizens’ constitutional rights by physically abusing journalists due to their jobs, revoking journalists’ accreditation, and media censorship by blocking access to websites.

C. Freedom of Assembly Rights in the Belarus Constitution

Article 35 of the Constitution provides the “freedom to hold assemblies, rallies, street marches, demonstrations and pickets that

⁷² James S. Gilmore III, *Attacks on Freedom of Opinion and Expression and Media Freedom in Belarus*, U.S. MISSION OSCE (Sept. 3, 2020), <https://osce.usmission.gov/attacks-on-freedom-of-opinion-and-expression-and-media-freedom-in-belarus/> [https://perma.cc/3EXU-VN5Z].

⁷³ *Id.* (“[The] actions by the Belarusian government are clearly designed to intimidate and deter independent reporting.”).

⁷⁴ *Id.*

⁷⁵ U.S. Dep’t of St. 2019 Report, *supra* note 55, at 9.

⁷⁶ *Id.*

⁷⁷ See *Belarus: Crackdown on Freedom of Expression*, ARTICLE 19 (Sept. 7, 2020), <https://www.article19.org/resources/crackdown-freedom-of-expression/> [https://perma.cc/2QPU-UKEH].

do not disturb law and order or violate the rights of other citizens.”⁷⁸ Even though the Constitution requires the freedom of peaceful assembly, the Government has severely restricted this right.⁷⁹ Lukashenka has created many restrictions to a person’s freedom of assembly rights, including requiring organizers of public events to notify the Government prior to an event and gain permission from authorities even to hold an event.⁸⁰ The Law on Mass Events, which provides these restrictions for their citizens’ freedom of assembly, was adopted in 1997.⁸¹ There have been numerous amendments to the law, but the most recent amendment in January 2019 added further restrictions to the ability of citizens to gather publicly.⁸² The amendment allows the Government to deny any public assembly and led to the Government’s denial of many requests to hold protests.⁸³ Since the 2020 election, thousands of citizens who have come together to protest pressing issues peacefully have faced charges under Article 23.34 of the Code of Administrative Offences for “participation in an unauthorized mass event.”⁸⁴ Additionally, the Government uses intimidation tactics and threats to citizens to “discourage persons from participating in demonstrations.”⁸⁵

Most recently, in April 2021, Belarus’ parliament brought forth several draconian bills that would expand legal restrictions on mass media outlets, including expanding the list of grounds authorities can use to deny accreditation to journalists, block their websites, or shut them down.⁸⁶ Additionally, one of the proposed amendments

⁷⁸ Belarus Const. § II, art. 35.

⁷⁹ U.S. Dep’t of St., Bureau of Democracy, H.R. and Lab., Belarus 2018 Human Rights Report 1 (2018) [hereinafter U.S. Dep’t of St. 2018 Report].

⁸⁰ See *Belarus 2019*, AMNESTY INT’L, <https://www.amnesty.org/en/countries/europe-and-central-asia/belarus/report-belarus/> [https://perma.cc/CE8V-V6H3] (last visited Dec. 8, 2020).

⁸¹ Law on Mass Events in the Republic of Belarus, No. 114-Z of Dec. 30, 1997 (Belr.).

⁸² See *Belarus: Events of 2019*, *supra* note 38.

⁸³ See *id.*

⁸⁴ See United Nations High Commissioner for Human Rights, *Situation of Human Rights in Belarus in the Context of the 2020 Presidential Election*, ¶¶ 41, 43, U.N. Doc. A/HRC/46/4 (Feb. 15, 2021).

⁸⁵ U.S. Dep’t of St. 2018 Report, *supra* note 79, at 19.

⁸⁶ Anastasiia Zlobina, *New Laws Further Stifle Freedom of Speech in Belarus*, HUM. RTS. WATCH (Apr. 7, 2021), <https://www.hrw.org/news/2021/04/07/new-laws-further-stifle-freedom-speech-belarus> [https://perma.cc/Q9XG-97DR].

would make it illegal for journalists to criticize the Government.⁸⁷ Lukashenka also approved legislation that would ban journalists from providing real-time coverage of unauthorized mass events, effectively putting targets on the backs of journalists attending those demonstrations.⁸⁸ Not only will journalists become targets, but the Belarus Government is now preventing the world from seeing any human rights abuses committed during these protests. These new laws will have a detrimental effect on not only freedom of assembly rights but also freedom of expression rights.

In sum, the Lukashenka-led Belarusian Government has substantially violated many protections provided by their Constitution. Despite the explicit constitutional provisions protecting freedom of expression and assembly and prohibiting torture, severe restrictions on the rights of citizens remain in place. Since August 9, 2020, citizens have been brutally tortured and oppressed from participating in peaceful protests. With a seemingly endless presidency, the Belarusian people have taken to the streets to call for the removal of Lukashenka from power. The only way the fundamental human rights guaranteed by the Constitution will be protected in the future is for the Lukashenka era to end or the relatively unlikely event of President Lukashenka's immediately ceasing all human rights violations and reforming the Government.

IV. Belarus' International Obligations

Under Lukashenka's rule, fundamental rights such as the rights to freedom of expression, association, and assembly have increasingly become obsolete in Belarus.⁸⁹ Belarus is a party to several international human rights treaties and is bound to abide by its obligations.⁹⁰ The international community criticizes Belarus for its "poor human rights record," but Lukashenka refuses to comply with the criticisms.⁹¹ Numerous human rights organizations have

⁸⁷ *Id.*

⁸⁸ See *Belarus Bans Journalists from Live Reporting at Protests*, DEUTSCHE WELLE (May 24, 2021), <https://www.dw.com/en/belarus-bans-journalists-from-live-reporting-at-protests/a-57649288> [<https://perma.cc/XV6Q-JR3F>].

⁸⁹ See U.S. Dep't of St. 2019 Report, *supra* note 55, at 1.

⁹⁰ *Country Factsheet Series: Belarus*, INT'L JUST. RES. CTR., <https://ijrcenter.org/wp-content/uploads/2020/02/Belarus-Factsheet.pdf> [<https://perma.cc/4KDZ-MFYX>] (last updated Jan. 2020).

⁹¹ *Belarus: Suppressing the Last Voices of Peaceful Dissent*, AMNESTY INT'L,

also given recommendations for legislation, policies, and practices to align Belarus with the commitments it has agreed to under international human rights law.⁹² The implementation of those recommendations has been limited.⁹³

As a member state of the United Nations (“U.N.”), Belarus is obligated to protect and respect numerous human rights.⁹⁴ Due to the country’s member state status, U.N. human rights bodies, including the Human Rights Council, oversee Belarus’ operations.⁹⁵ In addition to its status as a member state, Belarus has human rights obligations through its ratification of seven specific U.N. human rights treaties, including the International Covenant on Civil and Political Rights (“ICCPR”), the International Covenant of Economic, Social, and Cultural Rights (“ICESCR”), and the Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment (“CAT”).⁹⁶ U.N. treaty bodies observe the policies and practices of Belarus.⁹⁷ Although Belarus is also a member state of the Organization for Security and Co-operation in Europe (“OSCE”) and is bound by OSCE commitments, the promises they have made “do not have the character of legally binding treaties under international law.”⁹⁸ Therefore, Belarus is “only legally bound by human rights treaties which were adopted within the framework of the UN and the International Labour Organization (“ILO”) Conventions.”⁹⁹ Of the treaties ratified by Belarus, there are clear violations of three treaties—ICCPR, ICESCR, and CAT.

Although Belarus is legally bound by the ratification of these human rights treaties, enforcement mechanisms present an additional barrier to upholding obligations. When a state ratifies these treaties, they commit to respecting and ensuring the rights of

<https://www.amnesty.org/download/Documents/84000/eur490042005en.pdf>
[<https://perma.cc/X242-46AJ>] (last visited Dec. 8, 2020).

⁹² Miklós Haraszti (Special Rapporteur), *Report of the Special Rapporteur on the Situation of Human Rights in Belarus*, ¶ 28, U.N. Doc. A/HRC/29/43 (Apr. 29, 2015).

⁹³ *Id.*

⁹⁴ *Country Factsheet Series: Belarus*, *supra* note 90.

⁹⁵ *Id.*

⁹⁶ *Id.*

⁹⁷ *Id.*

⁹⁸ *Conditions in Belarus*, *supra* note 7, at 9.

⁹⁹ *Id.*

every person in their jurisdiction.¹⁰⁰ However, the treaties “defer to the state to determine and implement the measures” in any manner the state deems fit due to state sovereignty.¹⁰¹ Thus, state sovereignty, or the “Achilles’ heel” of the human rights system, impedes the enforcement of these human rights treaties.¹⁰² This next section will provide a broad overview of three treaties ratified by Belarus, which have in some way been violated by the actions of the Belarus Government throughout the 2020 election cycle.

A. *International Covenant on Civil and Political Rights* (“ICCPR”)

The International Covenant on Civil and Political Rights is an international human rights treaty adopted in 1966 by the U.N. General Assembly.¹⁰³ The ICCPR, the Universal Declaration of Human Rights, the International Covenant on Economic, Social, and Cultural Rights, and the two Optional Protocols to the ICCPR form the International Bill of Human Rights.¹⁰⁴ Together they set out the fundamental rights and freedoms that all humans around the world are entitled to possess.¹⁰⁵ The ICCPR’s purpose is to promote and encourage respect for human rights and fundamental freedoms.¹⁰⁶ Among the critical rights protected by the ICCPR are freedom of association,¹⁰⁷ freedom of expression,¹⁰⁸ and the right to be free from torture or cruel and inhuman treatment.¹⁰⁹

The Human Rights Committee (“HRC”) is mandated to enforce

¹⁰⁰ JULIE FRASER, SOCIAL INSTITUTIONS AND INTERNATIONAL HUMAN RIGHTS LAW IMPLEMENTATION: EVERY ORGAN OF SOCIETY 4 (2020).

¹⁰¹ *Id.*

¹⁰² See Sarah Joseph & Joanna Kyriakakis, *The United Nations and Human Rights*, RESEARCH HANDBOOK ON INTERNATIONAL HUMAN RIGHTS LAW 1, 1–2 (Sarah Joseph & Adam McBeth eds., 2010).

¹⁰³ United Nations International Covenant on Civil and Political Rights, Mar. 23, 1976, 999 U.N.T.S. 171 [hereinafter ICCPR].

¹⁰⁴ *Fact Sheet No. 2 (Rev. 1), The International Bill of Human Rights*, OFF. HIGH COMM’R HUM. RTS., <https://web.archive.org/web/20080313093428/http://www.unhchr.ch/html/menu6/2/fs2.htm> [https://perma.cc/2MDZ-ZCWV] (last visited Dec. 9, 2020).

¹⁰⁵ *Id.*

¹⁰⁶ See generally ICCPR, *supra* note 103 (announcing such a purpose).

¹⁰⁷ *Id.* art. 22.

¹⁰⁸ *Id.* art. 19.

¹⁰⁹ *Id.* art. 7.

the rights in the ICCPR.¹¹⁰ Once a country ratifies the ICCPR, the country has committed itself to “submit reports on the measures they have adopted which give effect to the rights recognized [t]herein and on the progress made in the enjoyment of those rights.”¹¹¹ Reports should be submitted within one year of signing the treaty and then whenever the HRC requests,¹¹² typically every four years.¹¹³ Once the HRC reviews the reports, a summary of its impartial assessments of the State’s human rights situation will be distributed to the State.¹¹⁴ However, the HRC’s observations are not legally binding on the State.¹¹⁵ Additionally, the rights enumerated in the ICCPR can be evoked through the Universal Periodic Review (“UPR”), a tool of the HRC where the human rights record of a member state is reviewed periodically.¹¹⁶

Since Belarus ratified the ICCPR, it has submitted four reports to the U.N. HRC, including one initial report upon ratification and three periodic reports.¹¹⁷ The last report submitted to the HRC was in 1997, and Belarus has been overdue on its reporting requirements since 2001.¹¹⁸ In September 2020, the U.N. Human Rights Council approved a proposal to hold an urgent debate on the human rights situation in Belarus.¹¹⁹ A resolution was adopted in which the Council urged Belarusian authorities to fulfill their obligations under international human rights law, including their obligations

¹¹⁰ Christian Tomuschat, *International Covenant on Civil and Political Rights*, U.N. AUDIOVISUAL LIBR. INT’L L. 3, https://legal.un.org/avl/pdf/ha/iccpr/iccpr_e.pdf [<https://perma.cc/ZE8Q-YEV9>] (last visited Dec. 11, 2020).

¹¹¹ ICCPR, *supra* note 103, art. 40.

¹¹² *Id.*

¹¹³ *Human Rights Committee*, U.N. HUM. RTS. OFF. HIGH COMM’R, <https://www.ohchr.org/en/hrbodies/ccpr/pages/ccprindex.aspx> [<https://perma.cc/3YA6-4HE5>] (last visited Feb. 10, 2022).

¹¹⁴ *See* Tomuschat, *supra* note 110, at 3.

¹¹⁵ *Id.* Although the observations by the HRC are not binding on the State, every treaty in force is still binding upon its signatories.

¹¹⁶ *Arbitrary Preventative Detention of Activists in Belarus*, INT’L FED’N FOR HUM. RTS. 9, <https://www.refworld.org/pd/fid/547732ea4.pdf> [<https://perma.cc/ER6W-D9FT>] (last visited Dec. 14, 2020) [hereinafter *Arbitrary Preventative Detention*].

¹¹⁷ *Conditions in Belarus*, *supra* note 7, at 9.

¹¹⁸ *Arbitrary Preventative Detention*, *supra* note 116, at 9.

¹¹⁹ Lisa Schlein, *UN Council to Hold Urgent Debate on Human Rights Situation in Belarus*, VOICE AM. NEWS (Sept. 14, 2020), <https://www.voanews.com/europe/un-council-hold-urgent-debate-human-rights-situation-belarus> [<https://perma.cc/YX6Z-HT9B>].

under the ICCPR.¹²⁰ Overall, the international community agrees that the human rights situation in Belarus needs to be addressed.¹²¹ Belarus must abide by its obligations under the ICCPR and resolve the human rights situation.¹²²

However, even though the ICCPR has legal status in international law and is binding on any State that ratifies the treaty, it is not necessarily effective.¹²³ There are essentially no effective sanctions for non-compliance with the obligations state parties have accepted with ratification.¹²⁴ The HRC can mention a State Party's failure to submit their obligatory reports in the Committee's Annual Report to the General Assembly. However, this reprimand is not regarded as significant by State Parties.¹²⁵ Since the ICCPR undeniably fails to penalize noncomplying States, Belarus has been able to repeatedly violate its obligations under the ICCPR and face no consequences.

B. International Covenant on Economic, Social, and Cultural Rights ("ICESCR")¹²⁶

The International Covenant on Economic, Social, and Cultural Rights is an international human rights treaty registered in 1976 by the United Nations General Assembly.¹²⁷ Like the ICCPR, the ICESCR is a part of the International Bill of Human Rights.¹²⁸ The Covenant is monitored by the U.N. Committee on Economic,

¹²⁰ See *Human Rights Council Adopts Resolution on Situation of Human Rights in Belarus*, UN HUM. RTS. COUNCIL (Sept. 18, 2020), <https://www.ohchr.org/EN/HRBodies/HRC/Pages/NewsDetail.aspx?NewsID=26262&LangID=E> [<https://perma.cc/8YT4-8HGE>].

¹²¹ See *id.*

¹²² See *id.*

¹²³ See Elizabeth Willmott-Harrop, *Human Rights Mechanisms and International Law*, LIBERTY HUM. (Jan. 2001), <https://libertyandhumanity.com/themes/international-human-rights-law/human-rights-mechanisms-and-international-law/> [<https://perma.cc/U479-Z4CX>].

¹²⁴ See *id.*

¹²⁵ See *id.*

¹²⁶ International Covenant on Economic, Social and Cultural Rights, Jan. 3, 1966, 993 U.N.T.S. 3 [hereinafter ICESCR].

¹²⁷ See *id.*

¹²⁸ See *id.*

Social, and Cultural Rights.¹²⁹ The ICESCR guarantees a comprehensive range of substantive rights, including the right to non-discrimination and the right to participate in cultural life.¹³⁰

Unlike the ICCPR, there is no complaint procedure under the ICESCR.¹³¹ Therefore, the primary mechanism for its enforcement is the State reporting process.¹³² Every five years, State Parties are required to prepare reports on the situation of ESCR in their country, which the U.N. Committee (“CESCR”) then reviews.¹³³ The CESCR reviews each State Parties’ report, as well as reports from other sources, and then releases the concluding observations, which provide an overview of the State’s “progress made in fulfilling ESCR, difficulties in achieving these rights, areas of concern, and recommendations.”¹³⁴ The concluding observations of the CESCR are not legally binding, and there is no method of enforcement. However, if a State Party ignores the comments, they act in bad faith of their Covenant-based obligations.¹³⁵ Belarus’s violations of the ICESCR are not as blatant as their violations of the ICCPR or the CAT. However, there are clear violations of their obligations as a whole for violating the International Bill of Human Rights to which the ICESCR comprises.

*C. Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment (“CAT”)*¹³⁶

The Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment is an international human rights treaty adopted in 1985 that aims to protect the “inherent

¹²⁹ See *Committee on Economic, Social, and Cultural Rights*, UN HUM. RTS. OFF. HIGH COMM’R, <https://www.ohchr.org/EN/HRBodies/CESCR/Pages/CESCRIndex.aspx> [https://perma.cc/C2Y2-7EJ7] (last visited Dec. 14, 2020).

¹³⁰ See ICESCR, *supra* note 126, art 1.

¹³¹ *Social, Cultural, and Economic Rights Under International Law*, OFF. HUM. RTS. COUNCIL, <http://www.ohrc.on.ca/en/book/export/html/2903> [https://perma.cc/QCY7-89E6] (last visited Dec. 14, 2020).

¹³² See *id.*

¹³³ See *Human Rights Enforcement Mechanisms of the United Nations*, ESCR-NET, <https://www.escr-net.org/resources/human-rights-enforcement-mechanisms-united-nations> [https://perma.cc/7FXS-BPYK] (last visited Aug. 26, 2021).

¹³⁴ See *id.*

¹³⁵ See *id.*

¹³⁶ Convention Against Torture and Other Cruel, Inhuman, or Degrading Treatment and Punishment, June 26, 1987, 1465 U.N.T.S. 85 [hereinafter CAT].

dignity of the human person.”¹³⁷ The CAT is based upon the recognition that torture is already illegal under international law.¹³⁸ Therefore, the treaty’s purpose is not to outlaw torture but to “strengthen the existing prohibition of such practices by a number of supportive measures.”¹³⁹

The CAT defines “torture” as “any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person.”¹⁴⁰ Additionally, the CAT defines torture as “such pain or suffering [that] is inflicted by . . . a public official or person acting in an official capacity.”¹⁴¹ Thus, the CAT only pertains to practices which occur at the hands of public officials, as opposed to those that occur in non-governmental settings.¹⁴² All States that are a party to the CAT are obligated to submit periodic reports on how the rights that it covers are being implemented in their country to the United Nations Committee against Torture (“the Committee”).¹⁴³ If the Committee receives reliable information that “torture is being systematically practiced in the territory of a State Party[,]” then the Committee can initiate a confidential inquiry, whereupon, they will provide comments or suggestions to the State Party.¹⁴⁴

It is clear that Belarusian authorities have tortured their citizens over the past few decades, but especially in the last few months of 2020.¹⁴⁵ The mistreatment suffered by Belarusian citizens undoubtedly meets the definition of torture provided by the CAT.¹⁴⁶ Yet, even if the Committee receives reliable information on torture practices in Belarus, it is unlikely the practices will change due to the significant obstacles regarding the enforcement of international

¹³⁷ *See id.*

¹³⁸ J. HERMANN BURGERS & HANS DANIELIUS, *THE UNITED NATIONS CONVENTION AGAINST TORTURE: A HANDBOOK ON THE CONVENTION AGAINST TORTURE AND OTHER CRUEL, INHUMAN, OR DEGRADING TREATMENT OR PUNISHMENT* 1 (Martinus Nijhoff Publishers 1988).

¹³⁹ *See id.*

¹⁴⁰ CAT, *supra* note 136, art. 1.

¹⁴¹ *Id.*

¹⁴² *Id.*

¹⁴³ Ronagh McQuigg, *How Effective is the United Nations Committee Against Torture?*, 22 EUR. J. INT’L L. 813, 813 (2011).

¹⁴⁴ *See* BURGERS & DANIELIUS, *supra* note 138, at 1.

¹⁴⁵ *See supra* Section III.A.

¹⁴⁶ *See id.*

human rights standards.¹⁴⁷ The ICCPR, ICESCR, and CAT can and will highlight the numerous inadequacies of Belarus' agreement to international treaties, which will bring universal pressure and shame on their Government. However, the impact of these U.N. human rights treaties truly depends on Belarus's commitment to its obligations.¹⁴⁸

V. The European Union's Framework to Address Human Rights Violations Around the World

On December 7th, 2020, the Council of the European Union ("E.U.") adopted a regulation instituting a global human rights sanctions regime.¹⁴⁹ The E.U.'s global human rights sanction regime is modeled after the Magnitsky Act—a U.S. law restricting specific individuals and entities' access to travel and the global financial system.¹⁵⁰ This framework will allow the E.U. to target individual entities and bodies responsible for, involved with, or associated with severe human rights violations and abuses worldwide.¹⁵¹ The framework applies to genocide, crimes against humanity, torture and other cruel treatment, enforced disappearance of persons, and arbitrary arrests or detentions.¹⁵² The regulation provides restrictive measures such as a travel ban applying to individuals and the freezing of funds applying to both individuals and entities.¹⁵³ Additionally, the regulation prohibits persons and entities in the E.U. from making funds and economic resources available to those involved in severe human rights violations or abuses.¹⁵⁴

The E.U.'s regulation could have harsh consequences for those

¹⁴⁷ See McQuigg, *supra* note 143, at 827. One problem with the enforcement of the CAT is that the Committee cannot impose sanctions on States that refuse to comply with their obligations.

¹⁴⁸ See *id.*

¹⁴⁹ Council Regulation 2020/1988 of Dec. 7, 2020, Concerning Restrictive Measures Against Serious Human Rights Violations and Abuses, 2020 O.J. (L 410 I) 63 (EU).

¹⁵⁰ Zachary Basu, *How the EU Plans to Take on Human Rights Abusers*, Axios Media (Sept. 17, 2020), <https://www.axios.com/european-magnitsky-act-3e9bb52e-4fd5-437c-95ec-b822fd64691e.html> [<https://perma.cc/2TZY-GQYN>].

¹⁵¹ See Council Regulation 2020/1988, *supra* note 149.

¹⁵² See *id.* The full list of acts this regulation applies to can be found in Article 2 of the regulation.

¹⁵³ See *id.*

¹⁵⁴ See *id.*

responsible for the abuses in Belarus. Any member state of the E.U. or the High Representative of the E.U. for Foreign Affairs and Security Policy can submit a proposal for the Council to establish, review, and amend the sanctions list.¹⁵⁵ The E.U.'s new sanctions regime could prove to be a valuable instrument for member states to reprimand any state or individual that commits human rights abuses around the world. Since the implementation of the E.U.'s framework, 166 individuals and fifteen entities including Alexander Lukashenka and other key figures in the political leadership have been designated under the sanctions.¹⁵⁶ Additionally, three Baltic countries—Lithuania, Latvia, and Estonia—imposed sanctions on Belarusian officials.¹⁵⁷ In response to the Baltic countries' sanctions, Belarus imposed their own travel ban on officials from those countries.¹⁵⁸

Since there are significant limitations with the enforcement of the binding standards of the international treaties Belarus has implemented, the E.U.'s framework could be the best option to crackdown on the human rights violations in the country. If the E.U. implements sanctions, in conjunction with treaty violations or sanctions by other countries, Belarus officials would be considerably limited in their actions, which could lead to an end to the abuses in the country.

VI. Conclusion

The systematic human rights abuses in Belarus have persisted for too long, and the citizens of Belarus have endured an excessive amount of suffering. "Europe's last dictator" has maintained an authoritarian grip on Belarus for over twenty-five years. Although the 2020 presidential election was clearly fraudulent, leading to mass protests and, subsequently, a violent crackdown, Lukashenka refuses to step down from power or allow a new election. The

¹⁵⁵ *See id.*

¹⁵⁶ *Belarus: EU Broadens Scope for Sanctions to Tackle Hybrid Attacks and Instrumentalization of Migrants*, COUNCIL OF THE EU (Nov. 15, 2021), <https://www.consilium.europa.eu/en/press/Spres-releases/2021/11/15/belarus-eu-broadens-scope-for-sanctions-to-tackle-hybrid-attacks-and-instrumentalisation-of-migrants/> [https://perma.cc/RW8T-Z3J3].

¹⁵⁷ *Belarus to impose retaliatory sanctions against Baltic states, foreign minister says*, REUTERS (Sept. 2, 2020), <https://www.reuters.com/article/uk-belarus-election-sanctions-idUKKBN25T1NH> [https://perma.cc/B9UP-4SLB].

¹⁵⁸ *See id.*

systematic violations of the Belarus Constitution and international law must be addressed. The international community must step in and support the goals of the protestors. The end of Lukashenka's rule could be near, with the aid of the international community.