

16 June 2025

## **RUSSIA: Prosecutions for unlawful "missionary activity" – 2024 to 2025**

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*At least 90 people in 2024 and 34 in January-April 2025 were prosecuted for unlawful "missionary activity". Fines are typically several weeks' average wages, but foreigners can be deported. A Kurganinsk Magistrate's Court fined six Baptists – including Pastor Aleksandr Chmykh - for leading worship meetings. A Stavropol Muslim teacher was fined for leading prayers and Koranic studies for girls. Police and prosecutors did not respond on why they had brought charges to punish individuals who had conducted worship services in places of worship, prayer rooms, or residential premises.*

Individuals and religious organisations continue to be brought to court across Russia on administrative charges of unlawful "missionary activity". These charges punish a wide range of activities, including ordinary worship meetings for fellow believers. Forum 18 found 124 such prosecutions between the beginning of January 2024 and the end of April 2025. The true number is believed to be higher.

More than 95 per cent of defendants whose cases reached a verdict are known to have been found guilty during this period (see below).

A Magistrate's Court in Kurganinsk fined Aleksandr Chmykh, pastor of the Kurganinsk Council of Churches Baptist church, 5,000 Roubles in March 2024 for having "organised and conducted worship services in Kurganinsk, by which he violated the requirements of the [Religion Law], namely, he did not submit in the established order notification of the beginning of the activities of the religious group to the Justice Ministry". Five other Baptists who participated in a two-day conference were also prosecuted (see below).

Four women were among others prosecuted: a Roman Catholic from Zabaykalsk Region who made posts in the VKontakte group of the "Sisters Servants of the Blessed Virgin Mary of the Immaculate Conception" (a Catholic religious congregation); a Muslim teacher who led prayers and Koranic studies for girls in Stavropol; a Protestant pastor who put on an educational event about Christmas at a cultural centre in Chukotka Region; and a Seventh-day Adventist from the Mari El Republic (see below).

For a list of the 90 known prosecutions in the 2024 calendar year and 34 known prosecutions in the first four months of 2025, see forthcoming F18News article.

Russian citizens found guilty of "unlawful missionary activity" are prosecuted under Administrative Code Article 5.26, Part 4, and can receive fines of 5,000 to 50,000 Roubles. Foreign citizens can be fined 30,000 to 50,000 Roubles under Administrative Code Article 5.26, Part 5. They may also be expelled from the country. Registered organisations (also prosecuted under Part 4) can be fined up to 100,000 Roubles (see below).

A fine of 50,000 Roubles represented two and a half weeks' average wages in 2024 for those in work or just over 10 weeks' average state retirement pension (see below).

(Russia is also imposing these punishments ([https://www.forum18.org/archive.php?article\\_id=2963](https://www.forum18.org/archive.php?article_id=2963)) in parts of Ukraine it has illegally occupied.)

Both Forum 18's figures, drawn from available court records, and the Russian Supreme Court's figures (which are not disaggregated and include cases under Parts 1-3 of Administrative Code Article 5.26) indicate an increase in prosecutions in the last year.

Forum 18 has also found an increase in administrative expulsions of foreign citizens. This may be difficult to track in the future, however, as amendments to the Administrative Code, which came into force in February 2025, enable police to expel non-Russians in missionary-related cases without needing to go to court (see below).

Forum 18 asked police and prosecutors in several regions why they had brought charges of "unlawful missionary activity" against

individuals who had conducted worship services in places of worship or prayer rooms, or on residential premises (freely permitted under the Religion Law) and where only people who were already members of the community were present. Police and prosecutors gave no explanation for this (see below).

The proportion of cases involving Muslims remains high, continuing a trend Forum 18 first observed in 2019-2020. The activity for which most Muslims are prosecuted under Administrative Code Article 5.26, Parts 4 and 5 is simply conducting prayers on premises which are not officially designated places of worship – such as workplaces, workers' hostels, or unregistered prayer houses (see below).

Council of Churches Baptists, who do not seek state registration of their communities, have also faced increasing rates of prosecution for "unlawful missionary activity". Prosecutions are usually linked to the fact that they do not submit notification to the authorities of the creation of a religious group. In some cases, this has been used as partial grounds for prosecutors to seek a ban on their activities (see below).

On 16 May 2025, bailiffs sealed a Baptist church in Kurganinsk (Krasnodar Region) whose activities a court had prohibited in September 2024. Churches in Belorechensk (also Krasnodar Region), Tula, and Blagoveshchensk are also facing a similar ban on activities (see forthcoming F18News article).

Religious organisations also continue to face prosecution under Administrative Code Article 5.26, Part 3 ("Implementation of activities by a religious organisation without indicating its official full name, including the issuing or distribution, within the framework of missionary activity, of literature and printed, audio, and video material without a label bearing this name, or with an incomplete or deliberately false label"). Religious organisations are prosecuted for not showing the complete forms of their officially registered names ([https://www.forum18.org/archive.php?article\\_id=2897](https://www.forum18.org/archive.php?article_id=2897)) on literature, online, and most frequently on buildings.

Broadly defined "missionary activity"

On 6 July 2016, President Vladimir Putin signed amendments to the Religion Law imposing tight restrictions on the sharing of beliefs, including on where and by whom they may be shared. The amendments effectively ban broadly defined "missionary activity" by anyone without written permission from an officially recognised religious association, and apparently any activity performed by religious organisations not using their full legal names.

The amendments also prohibit "missionary activity" on residential premises, or by anyone who is a former member of an "extremist" religious organisation. They allow wide scope for arbitrary official actions.

The amendments were introduced as part of an "anti-terrorism" package ([https://www.forum18.org/archive.php?article\\_id=2897](https://www.forum18.org/archive.php?article_id=2897)) proposed by United Russia Duma deputy Irina Yarovaya and Senator Viktor Ozerov. Protests against the changes were widespread.

A 2015 amendment to the Religion Law required all unregistered religious groups to notify the authorities (usually regional branches of the Justice Ministry) of their existence and activities. This includes providing the names and addresses of all their members, and addresses where any meeting takes place. The written authorisation required by anyone conducting missionary activity on behalf of a religious group includes "written confirmation of receipt and registration of the notification of the [group's] creation and commencement of activities" – the lack of such notification is therefore often taken as evidence of unlawful missionary activity", even if no group in fact exists.

This is despite a 15 October 2018 Constitutional Court ruling that failure to submit notification of the existence of a religious group does not in isolation constitute an offence under Article 5.26, Part 4 (see below).

Punishments

Individuals and legal entities who violate any of the July 2016 restrictions and requirements are subject to punishment under Administrative Code Article 5.26:

- Part 3 ("Implementation of activities by a religious organisation without indicating its official full name, including the issuing or distribution, within the framework of missionary activity, of literature and printed, audio, and video material without a label bearing this name, or with an incomplete or deliberately false label");
- Part 4 ("Russians conducting missionary activity");
- or Part 5 ("Foreigners conducting missionary activity").

These were all signed into law at the same time.

Under Part 4 ("Russians conducting missionary activity"), Russian citizens are liable for a fine of 5,000 to 50,000 Roubles. For

organisations (legal entities), the fine stands at 100,000 to 1 million Roubles. Religious groups, while they may share their beliefs in limited circumstances, are not legal entities – their members are therefore subject to prosecution as individuals.

A fine of 50,000 Roubles represented two and a half weeks' average wages in 2024 for those in work or just over 10 weeks' average state retirement pension.

Under Article 5.26, Part 5, foreign citizens may be fined 30,000 to 50,000 Roubles for the same offence as under Part 4, with the possibility of expulsion from Russia.

Punishments under Part 3 ("Implementation of activities by a religious organisation without indicating its official full name, including the issuing or distribution, within the framework of missionary activity, of literature and printed, audio, and video material without a label bearing this name, or with an incomplete or deliberately false label") are a fine of 30,000 to 50,000 Roubles and possible confiscation of any materials.

Prosecution under Article 5.26, Part 4 may have further consequences for religious communities.

Constitutional Court interpretations of "missionary activity"

On 13 March 2018, the Constitutional Court issued an interpretation ([https://www.forum18.org/archive.php?article\\_id=2377](https://www.forum18.org/archive.php?article_id=2377)) of some of the legal norms in the "anti-missionary" legislation. "A defining feature [sistemooobrazuyushchy priznak] of missionary activity", it declared, "is the dissemination, by citizens and their associations, of information about a specific religious belief among persons who, not being its followers, are involved in their number, including as participants in specific religious associations".

Distributing information – for example, about meetings for worship, ceremonies, or events – therefore "falls under the definition of missionary activity as such, only if it contains the said defining feature".

The Constitutional Court concluded that establishing whether missionary activity has been carried out requires "the identification of all the signs of missionary activity specified in [the Religion Law]". If any is absent, the religious activity "cannot qualify as missionary activity in the sense of the [Religion Law], and therefore, even if it is committed in violation of the requirements of the [Religion Law], it does not constitute an offence as stipulated in Administrative Code Article 5.26, Part 4".

The Constitutional Court has issued three further statements on Article 5.26, Part 4:

– on 15 October 2018, that failure to submit notification of the existence of a religious group does not in isolation constitute an offence under Part 4, and courts should take into account all the circumstances to ascertain whether the Constitutional Court's definition of the "defining feature" of missionary activity has been met (it is difficult to ascertain whether this is having any effect on court decisions separately from the Constitutional Court's March 2018 ruling);

– on 11 February 2021, that missionary activity may be conducted outside the explicitly permitted locations listed in Religion Law Article 24.1 (which include places of worship (v kultovyykh pomeshchaniyakh), other buildings and land to which religious organisations have property rights, cemeteries, and pilgrimage sites), as long as it complies with all the requirements of Religion Law Article 24.2;

– and on 29 September 2022, that "the implementation by citizens (foreign citizens, stateless persons) of missionary activity on behalf of a religious group, in turn, testifies to the creation of such a group, the legal existence of which presupposes notification of the beginning of its activity"(see below).

While judges often explicitly acknowledge the Constitutional Court's interpretations of Article 5.26 in their rulings, this rarely leads to acquittal. Between January 2024 and April 2025, Forum 18 found only three acquittals, all of which were based on the March 2018 clarification of "missionary activity" (a judge sent a fourth case back to police on the same basis).

## Statistics

In an analysis of available court records, Forum 18 found a total of 124 prosecutions under Administrative Code Article 5.26, Parts 4 and 5 in the calendar year 2024 and the first four months of 2025.

It is unknown how many other individuals and organisations may have faced charges, as cases against Russian citizens and legal entities (which comprise the vast majority) are heard in magistrates' courts, of which there are 7,745 across the country, almost all of which are searchable only individually. Establishing accurate figures is also difficult if religious communities or their members do not themselves make prosecutions known.

Administrative Code amendments meaning that most Article 5.26, Part 5 cases will be handled only by police, not courts, has also made the prosecution of foreigners hard to track since February 2025 (see below).

Russia's Supreme Court releases the number of cases brought each year under Article 5.26 as a whole, but does not disaggregate these figures, meaning that they include prosecutions under Part 3 (which was introduced as part of the 2016 anti-missionary amendment ([https://www.forum18.org/archive.php?article\\_id=2897](https://www.forum18.org/archive.php?article_id=2897)) but specifically punishes failure to display a religious organisation's official full name), and Parts 1 and 2, (which respectively punish "Obstructing the exercise of the right to freedom of conscience and religion" and "Deliberate public desecration" of religious objects and symbols).

Nevertheless, lawyers and human rights commentators believe the Supreme Court's figures broadly illustrate trends in Part 4 and 5 prosecutions. Lawyer Anatoly Pchelintsev noted on his Telegram channel on 21 April that the majority of cases enumerated by the Supreme Court will be missionary-related, "as is shown by [legal] practice". Another lawyer with experience of Article 5.26 prosecutions confirmed to Forum 18 on 29 May that "Parts 1 and 2 are very rare, a few cases per year", and that Part 4 is the "most common".

The Supreme Court's figures for the last few years are:

2024 – 431, of which 294 received punishments;

2023 – 354, of which 228 received punishments;

2022 – 388, of which 238 received punishments;

2021 – 329, of which 201 received punishments;

2020 – 335, of which 217 received punishments.

Both the Supreme Court's and Forum 18's figures show an increase in prosecutions in 2024.

Forum 18's review of available court records found 90 prosecutions in the 2024 calendar year (64 under Article 5.26, Part 4; 26 under Article 5.26, Part 5). It found 34 in January to April 2025 (26 under Part 4; 9 under Part 5). Six of these involved registered religious organisations, the remainder individuals, one of whom was charged as an "official person" (*dolzhnostnoye litso*) and punished more harshly than a private citizen (a Moscow Region imam who was fined 30,000 Roubles for holding or allowing prayers three times a day in two prayer houses, allegedly using amplification).

Only four women appear to have been prosecuted in the cases Forum 18 found: a Roman Catholic from Zabaykalsk Region who made posts in the VKontakte group of the Sisters Servants of the Blessed Virgin Mary of the Immaculate Conception (a Catholic religious congregation); a Muslim teacher who led prayers and Koranic studies for girls in Stavropol; a Protestant pastor who put on an educational event about Christmas at a cultural centre in Chukotka Region; and a Seventh-day Adventist from the Mari El Republic, the details of whose two prosecutions are unknown.

A number of cases appear to be based on surveillance by the Federal Security Service (FSB), which then informs prosecutors or police, who open administrative cases against the people or communities involved. Other cases may arise from police monitoring of religious communities' activities or routine prosecutor's office "inspections of compliance with the requirements" of the Religion Law and Extremism Law, or are triggered by calls to police or prosecutors from members of the public.

Lawyer Sergey Chugunov described on his Telegram channel on 26 April 2022 (<https://t.me/chugunovsv/22>) a case in which the FSB's "operational information", on which police based the prosecution, turned out to be a community's entry in the list of churches on the Protestant.ru website, which is drawn up without participation or knowledge of communities themselves. "All that remains for the valiant law enforcement officers is to go through the list of churches in their region, identify those who have not registered an organisation or notified [the Justice Ministry] about a group, and invite the violators to come in to draw up a protocol [of an offence]," Chugunov wrote.

It is usually unclear from court decisions, however, how activities come to the attention of investigative agencies, either because judges have not included such information or because it has been redacted in publicly available records.

Convictions remain high – appeals few and largely unsuccessful

With the caveat that it is not possible to give exact statistics because of the difficulty in obtaining comprehensive and reliable data, the conviction rate for prosecutions found by Forum 18 appears to have increased. Between January 2024 and April 2025, first-instance courts convicted 108 defendants and acquitted three. They sent a further 10 cases back to police or prosecutors. Three cases were dismissed because they reached court after the permitted three-month time period for administrative prosecutions had passed (the statute of limitations).

This gives an initial conviction rate of 97.28 per cent for known cases which reached a verdict, and 87.01 per cent overall. Between

July 2020 and December 2021, the conviction rate was 84.52 per cent for cases found by Forum 18 which reached a verdict – for the period January 2019 to June 2020, this figure was 90.86 per cent; in 2018, 90 per cent; and in 2016-17, 82 per cent.

Defendants submitted initial appeals in 31 known cases. Of these, 25 were unsuccessful and none was successful. The outcome of one appeal is as yet unknown. One appeal was rejected without consideration because of a missing signature and two for late submission. Two defendants succeeded in having their sentences changed, although the guilty verdicts were upheld (these were a Polish Catholic priest, ordered expelled from Russia under Article 5.26, Part 5, who managed to have his expulsion order overturned, and a Russian Orthodox (Moscow Patriarchate) parish, whose offence under Article 5.26, Part 4 was deemed insignificant and whose fine was therefore waived).

Eleven defendants challenged their unsuccessful appeal rulings in the cassational courts. So far, one of these cassational appeals has been successful (because of the statute of limitations), one unsuccessful, and two rejected without consideration. The remainder are yet to be considered.

### Religious profile

A wide range of religious backgrounds continues to be represented in known cases brought under Administrative Code Article 5.26, Parts 4 and 5. Muslims form a strong plurality as they have done over the last few years.

Known prosecutions in the calendar year 2024 and the first four months of 2025 involved individuals or organisations belonging to the following religious communities:

Muslim – 50 (35 in 2024, 15 in January to April 2025);

Council of Churches Baptists – 24 (16, 8);

Baptist Union – 4 (4, 0);

other Protestant – 7 (4, 3);

Society for Krishna Consciousness – 5 (4, 1);

Seventh-day Adventist – 2 (2, 0);

Roman Catholic – 3 (2, 1);

Armenian Catholic – 1 (1, 0);

Russian Orthodox Church (Moscow Patriarchate) – 1 (1, 0);

Russian Orthodox Autonomous Church – 1 (1, 0);

independent Orthodox – 1 (1, 0);

Orthodox-linked commercial entity – 1 (1, 0);

Christian of unknown denomination – 1 (1, 0);

Unknown affiliation – 23 (18, 5).

Muslims appear to be particularly vulnerable to the continued tendency of police and prosecutors to discern a "missionary" element even in ordinary gatherings for worship involving only fellow believers. An increasing number of raids on workplaces, hostels, and cultural centres by police looking for illegal immigrants, particularly in Moscow, have also led to a high number of Article 5.26, Part 5 prosecutions of Muslim migrant workers (23 known cases out of 34 Part 5 cases found).

The comparatively large number of prosecutions of Council of Churches Baptists derives mostly from an apparent increase in police and security service attention towards these communities in Krasnodar Region. Krasnodar Region saw 19 of the 24 cases involving people (mostly pastors) of this denomination.

### Geographical spread

Twenty-eight out of Russia's 83 federal subjects saw at least one known prosecution under Article 5.26, Parts 4 and 5 in 2024 and the first four months of 2025 (not counting Russian-annexed Ukrainian Regions).

The highest numbers of known prosecutions across this whole period were found in: Krasnodar Region – 29; Moscow – 22; Stavropol Region – 14; Tatarstan Republic – 12; Rostov Region – 5; Republic of Adygeya – 5.

The Krasnodar Region cases were derived from 19 investigations, including the prosecution of six Baptist pastors over one event (see below). As well as Council of Churches Baptists, Muslims, other Protestants, an Armenian Catholic priest, and a Polish Roman Catholic priest (see forthcoming F18News article) have also faced prosecution in this region.

"Due to proximity to the Caucasus, perhaps the fight against extremism is being conducted more actively (at least on paper) [in Krasnodar Region], and it is easiest to fight under Article 5.26," a Russian human rights researcher commented to Forum 18 on 9 June. "And the personal attitude of the security forces towards 'sectarians' must be taken into account. Baptists are now being actively suppressed there."

"Krasnodar is a complex region and finding the truth is extremely difficult," lawyer Anatoly Pchelintsev noted on Telegram on 27 January 2025.

Prosecutions lead to bans and church closures?

A single conviction of a religious community member under Article 5.26, Part 4 ("Russians conducting missionary activity") alone is not grounds for the dissolution of a religious association. Prosecutors or Justice Ministry branches may, however, use it in conjunction with other legal violations – or may use repeat convictions – as evidence in requesting the liquidation of a registered religious organisation or the suspension of a religious group.

This practice appears to have intensified in relation to Council of Churches Baptist communities in 2024 and 2025. Courts have ordered the suspension of activities of their churches in Kurganinsk and Belorechensk, both in Krasnodar Region. Courts cited the prosecution of their pastors for conducting "missionary activity" without notifying the Justice Ministry of the creation of religious groups as partial grounds for the decisions.

Council of Churches Baptists do not register their communities as religious organisations or submit notification of their existence as religious groups, arguing that the Religion Law and the Constitution permit them to meet for worship without state involvement.

Kurganinsk District Magistrate's Court No. 167 fined Aleksandr Chmykh, pastor of the Kurganinsk church, 5,000 Roubles under Article 5.26, Part 4 on 18 March 2024 for having "organised and conducted worship services in Kurganinsk, by which he violated the requirements of the [Religion Law], namely, he did not submit in the established order notification of the beginning of the activities of the religious group to the Justice Ministry".

The worship services in questions were in fact a two-day conference of the Caucasian Association of Council of Churches, according to the Council of Churches-Baptists Intercession Department. Five other Baptists who participated in the event were also prosecuted under Article 5.26, Part 4.

On 6 September 2024, Kurganinsk District Court upheld a lawsuit from prosecutors seeking a ban on the activities of Chmykh's church until the community submitted notification of its existence.

"In the building of the House of Prayer .. with the participation of residents of [Krasnodar Region] and neighbouring regions, including minors and missionaries and foreign citizens, illegal missionary religious events are systematically held," prosecutors argued in court, according to the written decision, seen by Forum 18.

The ban entered legal force upon its unsuccessful appeal at Krasnodar Regional Court on 26 November 2024. The community continued its activities. Pastor Chmykh received two further fines for "unlawful missionary activity" on 10 February 2025.

After Chmykh again appealed unsuccessfully against the ban at the 4th Cassational Court in Krasnodar on 7 May 2025, bailiffs sealed the church building on 16 May 2025. The community has since met for worship in front of its closed building.

Forum 18 wrote to Kurganinsk District Magistrate's Court No. 167 on 11 March to ask why it had found Pastor Chmykh guilty of "unlawful missionary activity" when the events in question took place inside the church and only fellow Baptists were present. Forum 18 had received no response by the end of the working day of 16 June.

Forum 18 wrote to the Krasnodar Region branch of the Federal Security Service (FSB), upon whose information prosecutors based their request to ban the church's activities, on 7 March, asking why a church conference was considered an "unauthorised mass event" when held inside the church itself, and why it was considered "unlawful missionary activity" if only fellow believers were present. Forum 18 had received no response by the end of the working day of 16 June.

Forum 18 wrote to Kurganinsk District Court asking why it had upheld the prosecutors' request to prohibit the church's activities, and seeking to clarify whether the church would be able to resume operations if it submits notification of its existence. The court press service responded on 17 March, ignoring Forum 18's first question but confirming that the court decision suspended the church's activities "until the elimination of violations by means of sending notification of the beginning of the activities of a religious group to the Office of the Justice Ministry for Krasnodar Region. After the elimination of violations, activity can be resumed".

Article 5.26, Part 5: expulsion from Russia – now extrajudicial?

On 5 February 2025, amendments to several Articles of the Administrative Code came into legal force. These remove Article 5.26, Part 5 ("Foreigners conducting missionary activity") from the list of offences automatically considered by a judge and transfer them largely to the jurisdiction of the police and other Interior Ministry bodies, while adding the police to the list of authorities able to impose administrative expulsion as punishment for administrative offences (previously, only a judge could issue such an order).

If a Part 5 case is initiated by "a body authorised to exercise functions in the sphere of control (supervision) over the activities of non-profit organisations", i.e. a branch of the Justice Ministry (vanishingly rare in Part 5 cases), it will still be sent to court and considered by a judge.

If the police decide to have an individual expelled from Russia, there will be no public court record of the case unless the person manages to lodge an appeal.

Forum 18 has so far found only one example of the police extra-judicially punishing a foreign citizen under Article 5.26, Part 5 after 5 February 2025, Muslim university student Samir Sharipov (see forthcoming F18News article).

Out of 35 prosecutions under Article 5.26, Part 5 in 2024 and the first four months of 2025, 32 resulted in guilty verdicts, 18 of which are known to have included administrative expulsion from Russia (some punishments are unknown). This appears to represent an increase on previous years.

Most Part 5 cases involve Muslims who appear to be migrant workers from Central Asian countries – they are mostly prosecuted for praying in their workplaces (despite often having their employers' support) or in hostel accommodation.

Forum 18 found Part 5 cases involving citizens of the following countries: Tajikistan – 7; Uzbekistan – 7; Poland – 2; Kyrgyzstan – 1; Armenia – 1; Ireland – 1. In 16 court rulings, defendants' citizenship was redacted, but the majority of these also appear to come from Central Asia.

Persistent lack of clarity over what constitutes missionary activity

Despite the Constitutional Court's attempts to clarify the law and the ways in which it should be applied, police and prosecutors continue to open cases against individuals and their communities for a wide range of activities, and judges continue to find them guilty.

Common grounds for prosecution include a lack of written authorisation from a religious organisation or group to carry out missionary activity on its behalf. This assumes, firstly, that everyone carrying out missionary activity must be representing a formally constituted religious association, rather than simply sharing their own beliefs (many defendants appear not to be members of any association); and secondly, that any activity which individuals might perform on behalf of (or merely in connection with) their religious communities is inherently "missionary".

The Religion Law states that missionary activity may be freely carried out in places of worship (v kultovykh pomeshcheniyakh), but is prohibited on residential premises "except in cases provided for by Article 16 Part 2" of the Religion Law, according to which "Religious services and other religious rites and ceremonies" may freely take place on residential premises.

Police and prosecutors often a) interpret simply meeting for worship as "missionary activity", and b) do not treat residential or commercial premises as "places of worship" (even if communities or individuals have formal permission from their owners to use them for worship meetings).

(Because of the difficulties some religious communities encounter in building, buying, or renting their own spaces for worship, they often have to meet on premises which are technically designated residential or commercial. This can also lead to prosecution under Administrative Code Article 8.8, Part 1 ("The use of a land plot not for its intended purpose in accordance with its belonging to a particular land category and/or authorised use").)

– on 27 May 2024, Neklinovsky District Magistrate's Court No. 2 (Rostov Region) fined Russian Orthodox Autonomous Church priest Hieromonk Dionisiy (Dmitry Belolipetsky) 5,000 Roubles under Article 5.26, Part 4 for having "disseminated his beliefs

among persons who are not members of the religious association" at a service "where participants sang religious hymns, read the Bible, prayed" at the Church of the Holy Apostles Peter and Paul in Sovetka village, without written authorisation from the religious association to perform missionary activity on its behalf;

(Belolipetsky's predecessor Archimandrite Artyomy (Aleksandr) Smitchenko, who died in 2022, was also fined ([https://www.forum18.org/archive.php?article\\_id=2731](https://www.forum18.org/archive.php?article_id=2731)) under Article 5.26, Part 4 by the same court in December 2020 for identical reasons.)

Forum 18 wrote to Rostov Regional Prosecutor's Office and the Magistrate's Court on 5 June 2025, asking why Belolipetsky had been prosecuted for simply leading worship in his own church, when this does not have the defining feature of missionary activity as set out by the Constitutional Court in March 2018. Forum 18 had received no response by the end of the working day in Rostov Region of 16 June.

– on 2 July 2024, Sterlitamak Magistrate's Court No. 3 (Republic of Bashkortostan) fined Council of Churches Baptist pastor Oleg Alekseyev 5,000 Roubles under Article 5.26, Part 4 for holding a worship service in his own home "with the participation of a person who is not a member of the group", without written authorisation from the religious group to carry out missionary activity and without having notified the Justice Ministry of the group's existence. Police had videoed the service during an inspection of "implementation of legislation on countering extremist activity". The prosecutor argued that the fact a police officer could freely enter the house and participate in the service is evidence of missionary activity. Pastor Alekseyev appealed unsuccessfully at Sterlitamak City Court on 12 August 2024.

Forum 18 wrote to the Republic of Bashkortostan Prosecutor's Office and the Magistrate's Court on 6 June 2025 asking why Pastor Alekseyev had been prosecuted for simply leading worship in his own church, when this does not have the defining feature of missionary activity as set out by the Constitutional Court in March 2018. Forum 18 had received no response from either by the end of the working day of 16 June.

– 1 August 2024, Aleksin Inter-District Court (Tula Region) fined Kyrgyz citizen Okhunzhon Isabayev 35,000 Roubles under Article 5.26, Part 5 for leading Muslim prayers "without documents on state registration", in a prayer room he had equipped with carpets, a clock, and religious literature. Isabayev's company had provided the prayer room in an administrative building at the request of Muslim employees. The judge noted Isabayev's employer's positive character reference, his legal migration status, and his lack of previous offences in deciding not to expel him from Russia.

Forum 18 wrote to Tula Region Prosecutor's Office and Tula Region's Unified Court Press Service on 6 June, asking why Isabayev had been prosecuted for simply leading prayers, when this does not have the defining feature of missionary activity as set out by the Constitutional Court in March 2018.

Olga Dyachuk, head of the Unified Court Press Service, responded on 11 June, directing Forum 18 to the written verdict on the court website. Forum 18 had received no response from the Prosecutor's Office by the end of the working day of 16 June.

"Missionary" prosecutions effectively prosecution for failure to notify

Another common reason for prosecution for "missionary activity" under Article 5.26, Part 4 or 5 is the failure to submit notification to a regional branch of the Justice Ministry of the existence of a religious group. This is cited in the verdicts of 31 cases found by Forum 18 between January 2024 and April 2025.

Failure to notify does not constitute a specific offence, although it can be prosecuted under Administrative Code Article 19.5 ("Failure to comply with a legal order (resolution, submission, decision) of a body (official) exercising state supervision (control)"). Legislators in Bashkortostan proposed amendments to the federal Religion Law in 2016, which would have a) clarified the requirement for religious groups to submit notification, and b) introduced fines for non-compliance. The State Duma eventually rejected this on 8 February 2023.

Cherlak District Magistrate's Court No. 105 (Omsk Region) fined Council of Churches Baptist pastor German Adrian 5,000 Roubles on 26 January 2024 for leading worship in his own house. The judge concluded that Adrian had disseminated "information about the doctrine of 'Christianity' of this group among persons who are not members of this religious group, with the purpose of involving these persons in the religious group, [and] conducted ceremonies and services on the premises of his home among persons who are not members of the religious group, by appealing to their consciousness, will, [and] feelings, including by disclosure .. of his own religious views and convictions, without observing the notification procedure for the activities of this religious group".

Pastor Adrian appealed unsuccessfully at Cherlak District Court on 24 February 2024 and the 8th Cassational Court in Kemerovo on 25 April 2024.

Forum 18 wrote to the Omsk Region Interior Ministry and Magistrate's Court No. 105 on 6 June to ask why Adrian had been prosecuted simply for conducting worship without submitting notification to the Justice Ministry, given that, firstly, this lacks the



defining feature of "missionary activity" as set out by the Constitutional Court, and secondly, that failure to notify should not in itself constitute an offence. Forum 18 had received no response from either by the end of the working day in Omsk Region of 16 June.

The Religion Law does not set out a specific process for the creation of a religious group. After a court banned their community's activities ([https://www.forum18.org/archive.php?article\\_id=2731](https://www.forum18.org/archive.php?article_id=2731)) because they had not submitted notification and subsequently carried out "unlawful missionary activity", Council of Churches Baptists in Anapa appealed to the Constitutional Court in 2022 to clarify this. The Constitutional Court refused to consider the appeal.

The Court stated in its 29 September 2022 ruling that "the implementation by citizens (foreign citizens, stateless persons) of missionary activity on behalf of a religious group, in turn testifies to the creation of such a group, the legal existence of which presupposes notification of the beginning of its activity".

"In my opinion, such an approach can only mean that the problem we raised will not be addressed", the Baptists' lawyer Sergey Chugunov commented on his Telegram channel (<https://t.me/chugunovsv/87>) after the ruling on 3 November 2022. "The uncertainty of the law is obviously beneficial to law enforcement."

"Citizens have the right to practice religion together without creating religious associations," Chugunov noted on 18 May 2025 (<https://t.me/chugunovsv/404>). "If citizens say that they have not created any group, then this is their legal right. To prove the opposite, criteria prescribed by law are needed. Without such criteria, all decisions to prohibit citizens from gathering contradict current legislation and the Constitution of the Russian Federation."

Chugunov believes that the situation is being left deliberately ambiguous. "Because if criteria for creating religious groups are prescribed, this will clearly distinguish this right from the right to gather without creating associations," he notes. "Thus, emphasising and confirming the right to gather without creating anything. After this, creating a group will be a pointless exercise, because [being] a group does not grant any additional rights. Why is it needed at all? It seems that someone does not want such a result." (END)

More reports on freedom of thought, conscience and belief in Russia (<https://www.forum18.org/archive.php?country=10>)

For background information see Forum 18's Russia religious freedom survey ([https://www.forum18.org/archive.php?article\\_id=2897](https://www.forum18.org/archive.php?article_id=2897))

Forum 18's compilation of Organisation for Security and Co-operation in Europe (OSCE) freedom of religion or belief commitments ([https://www.forum18.org/archive.php?article\\_id=1351](https://www.forum18.org/archive.php?article_id=1351))

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