

## Political Searches: The Phantom of Inviolability

Early in the morning, when your whole family is still asleep, your doorbell rings. ‘Who is it,’ you ask, and the answer is: ‘Your downstairs neighbours, you’ve flooded us.’ You rush to open the door, and in storms a crowd of masked special forces soldiers accompanied by an investigator, a State-controlled TV cameraman and pre-brought attesting witnesses. Half-dressed, the householder is sprawled on the floor, face down (or, alternatively, seated on a chair and ordered to look down) and is told that he is suspected of extremism and his home will now be searched. Using a smartphone is not allowed, and a lawyer, whom some of the occupants manages to phone by some miracle, is told off. Following a long argument, the lawyer is after all admitted to the scene – just in time for the filling in of the search report.

After the massive-scale protest actions against the rigging of the presidential and parliamentary elections in 2011-2012 and the ensuing Bolotnaya Square case, not a single week would pass without news that some of the grassroots activists has been taken in for questioning after a home search.

Political opponents are not the only ones exposed to a particular risk. Law enforcers called on journalist Pavel Nikulin after his interview with a young man who left to fight in Syria appeared in the journal *The New Times* under the title ‘Heading for Jihad from Kaluga’<sup>1</sup>. The ring at the door of video blogger Alexei Pskovitin (co-author of the *Nemagia* channel on YouTube) came after he posted a video criticising banker Oleg Tinkov and had a criminal case for defamation instituted against him<sup>2</sup>.

The searches took hours and came complete with the smashing of home furnishings and seizing electronic devices and data storage media. Even copies of the Moloko Plus almanac, T-shirts, badges and stickers were confiscated from Nikulin.

The home raids of a journalist and a blogger could hardly be justified by the need to find any materials relevant to the investigation. These were clear acts of intimidation (and, in the case of Nikulin, also an attempt to get hold of his information sources). Searches are being readopted as a means of exerting pressure and a way to find a technical pretext for an actual criminal prosecution<sup>3</sup>.

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<sup>1</sup> Search conducted at journalist Pavel Nikulin’s home. Meduza. 31 January 2018 [in Russian] // <https://meduza.io/news/2018/01/31/k-zhurnalistu-pavlu-nikulinu-prishli-s-obyskom>

<sup>2</sup> Searchers call on video bloggers of Nemagia channel. They are suspected of defaming Oleg Tinkov and his bank. Meduza. 13 September 2017 [in Russian] // <https://meduza.io/feature/2017/09/13/k-videoblogeram-iz-kanala-nemagiya-prishli-s-obyskom-ih-podozrevayut-v-klevete-na-olega-tinkova-i-ego-bank>

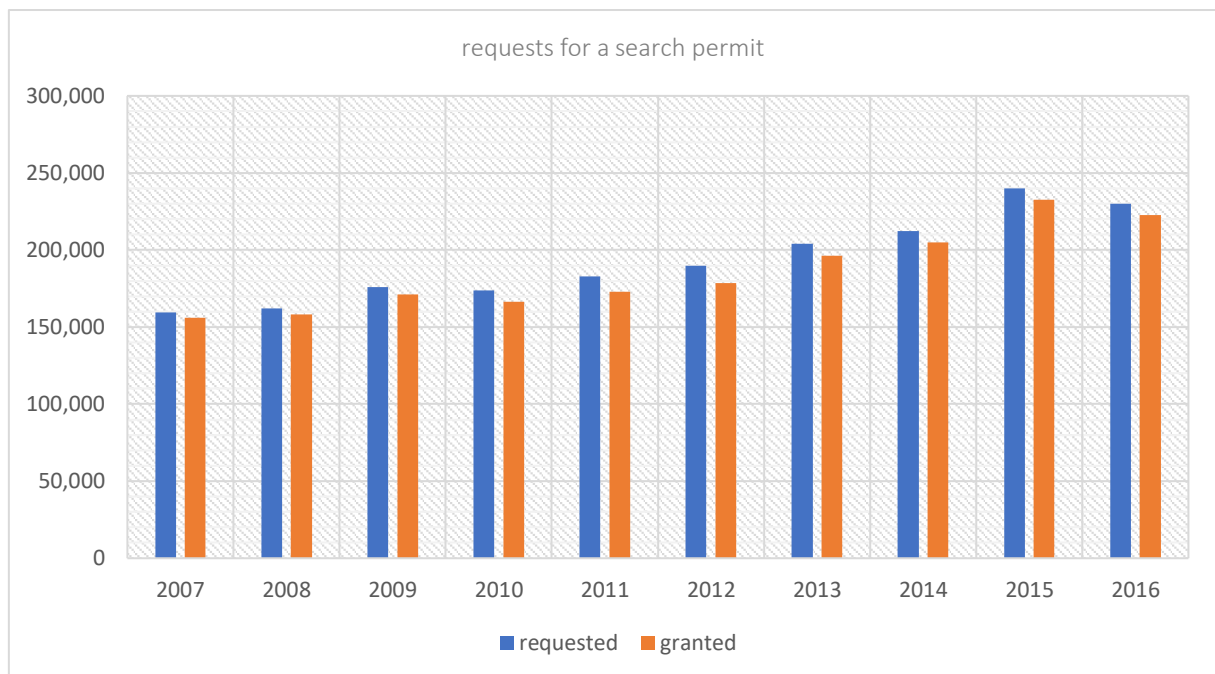
<sup>3</sup> Within this context, under search we subsume both the investigative action provided for by legislation and various types of examinations and inspections, as well as other intrusions into premises by government officials, including such that are not warranted by legislation.

### 3 Per Cent Privacy

Over the past ten and a half years, courts have issued law enforcement agencies **1,976,021** warrants to search or inspect private homes, which accounts for **96.32 per cent** of the total number of such warrant requests<sup>4</sup>. Thus, one in 27 homes in the country has been searched<sup>5</sup>.

Year	Home searches/examinations		
	Requested	Granted	(%)
2007	159,507	155,845	97.70
2008	162,185	158,392	97.66
2009	175,855	171,042	97.26
2010	173,963	166,539	95.73
2011	182,960	172,709	94.40
2012	189,698	178,393	94.04
2013	203,928	196,229	96.22
2014	212,396	204,785	96.41
2015	240,135	232,538	96.83
2016	229,982	222,638	96.80
First half of 2017	120,977	116,911	96.63
<b>TOTAL:</b>	<b>2,051,586</b>	<b>1,976,021</b>	<b>96.32</b>

At that, the total number of requests (and, accordingly, warrants) is growing, having increased by around 50 per cent over that period. Thus, at present, more than 500 searches on the average take place in Russia daily.



<sup>4</sup> Source: Judicial Department of the Supreme Court of the Russian Federation // <http://www.cdep.ru>

<sup>5</sup> According to the All-Russia population census (2010), there are 54.6 million private households in Russia // [http://www.gks.ru/free\\_doc/new\\_site/perepis2010/croc/perepis\\_itogi1612.htm](http://www.gks.ru/free_doc/new_site/perepis2010/croc/perepis_itogi1612.htm)

Recalling that during the same period judges granted an average 98.35 per cent of the motions for a restriction of citizens' constitutional rights to secrecy of correspondence, telephone conversations, telegraph and other communications transmitted over the electric and postal network<sup>6</sup>, it becomes obvious that inviolability of privacy does not exist in Russia even nominally.

The less than 4 per cent refusals of requests for home search warrants and less than 2 per cent refusals of requests for wiretapping and correspondence-monitoring warrants render this concept completely meaningless. Moreover, investigators, despite the extremely low probability of a refusal, quite often try to obtain a court approval for a search warrant after the fact.

Even more often, in 97.86 per cent of the cases on the average, judges have warranted an examination of living quarters as an operational-search measure (i.e. even before the institution of a criminal case).

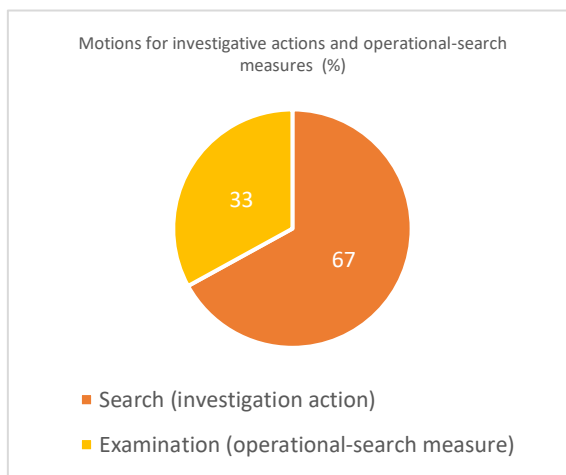
Home searches are only the tip of the iceberg. No court-approved warrant is required for searches and inspections of non-residential premises: offices, warehouses, conference rooms, etc., and in a number of cases they can be raided by officials of a number of other institutions, in addition to the police and the special

services: the Emergency Ministry, the public prosecutor's office, the Federal Service for Supervision of Consumer Rights Protection and Human Welfare, the Ministry of Justice. Information about the number of such raids is not published and, most probably, is not gathered, either.

For example, in march 2014, officials of the public prosecutor's office, the Ministry of Justice and the Ministry of Education of Tatarstan arrived for a check at the premises where the Agora Law School was holding a training workshop for lawyers, stating that a resident of Sochi had reported to them by e-mail that 'human rights defenders are being trained on foreign money in Kazan'<sup>7</sup>.

The raiding of offices by Emergency Ministry personnel is often used as a technical pretext for paralysing or discontinuing the work of an organisation. Fire safety requirements in Russia are so complicated and detailed, so difficult and expensive to comply with, that, when necessary, it is quite easy to look for flaws and non-conformities.

In Dagestan, we were faced with a situation in which police officers of the Centre for Combating Extremism entered premises on the grounds that the citizens who



<sup>6</sup> See Report of AGORA International 'Russia under Surveillance 2017: How the Authorities Are Setting Up a Total System for Monitoring Citizens' // [https://republic.ru/uploads/Россия-под-наблюдением-20172017\\_final%20\(1\).pdf](https://republic.ru/uploads/Россия-под-наблюдением-20172017_final%20(1).pdf)

<sup>7</sup> Andrei Smirnov. Prosecutor's Office Infiltrates Workshop. *Kommersant*. 29 March 2014 [in Russian] // <https://www.kommersant.ru/doc/2441409>

lived or worked there were placed on a preventive watch list. Incidentally, the Federal Law ‘On Administrative Supervision’ empowers police officers to enter a home without a court warrant in order to check the whereabouts of a person under administrative supervision at the place of residence.

## **Searches and the Constitution**

A search (which is one of the routine investigative actions provided for by criminal procedure legislation) is performed in order to locate the implements, equipment or other instruments of crime, objects, documents and valuables which may prove to be of importance to the criminal case.

In a number of cases, a search is practically a mandatory element of the investigation which is applied by default in drug cases, cases about economic crimes, corruption offences, as well as about extremism.

In accordance with the Criminal Procedure Code, a search is performed on the grounds of a court warrant (of living quarters) or of an investigator’s resolution (in all other cases). Nevertheless, in exceptional cases of urgency living quarters may be searched without obtaining a court warrant, but the court and the public prosecutor must be notified within 3 days. In 2017 the Supreme Court of the Russian Federation clarified that such exceptional cases refer, in particular, to situations in which a delay may enable a suspect to abscond or there is a risk of objects or instruments of crime being destroyed or concealed<sup>8</sup>.

Article 25 of the Constitution of the Russian Federation states: ‘The home shall be inviolable. No one shall have the right to enter a home against the will of the occupants thereof in any cases other than those established by federal law or on the grounds of a court decision.’

The search procedure described in the Criminal Procedure Code is one of the exceptions provided for by the Constitution. However, the definition of ‘home’ and the scope of the inviolability which extends to it are open to different interpretations.

The Criminal Procedure Code of the Russian Federation defines this concept as living premises used for permanent or temporary residence (Article 5). This rather narrow interpretation has entailed an established practice in which investigators request a court warrant only when living quarters or an officially registered dwelling house needs to be searched.

The European Court of Human Rights has adopted a considerably broader approach, treating the inviolability of the home as just one of the aspects of the right to respect for private and family life. At that, the Court views a search as one of the indisputable forms of interference with the right to respect for private life.

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<sup>8</sup> See Decree No 19 of 1 June 2017 of the Plenum of the Supreme Court of the Russian Federation ‘On the Case-Law of Examination by the Courts of Motions for the Performance of Investigative Actions Involving a Restriction of the Constitutional Rights of Citizens (Article 165 of the Criminal Procedure Code of the Russian Federation)’

In general, the European Court argues that whether or not a particular habitation constitutes a ‘home’ which attracts the protection of Article 8 of the Convention for the Protection of Human Rights and Fundamental Freedoms must be determined on a case-by-case basis depending on the factual circumstances and above all the existence of sufficient and continuous links with a specific place. Thus, the status of ‘home’ may cover cases of inhabiting (1) a home belonging to another person (as a hotel guest or tenant); (2) premises without legal grounds (as a squatter); (3) mobile homes, trailers, etc.; (3) summer houses and cottages, as well as (4) company office premises without a clear distinction between an own office and a private residence, or between private and business activity.

The last-mentioned criterion is particularly important because it makes it possible to extend the protection, say, to law offices and premises of non-governmental organisations.

Since April 2017, law offices in Russia have enjoyed greater formal protection than the residences of ordinary citizens: the latter, as noted above, can be searched without a court warrant and approval can be obtained after the investigative action has been performed. This scheme no longer works for law offices.

The pre-existing conflict between Article 8 of the Federal Law ‘On Advocacy and the Legal Profession in the Russian Federation’, providing that any operational-search measures and investigative actions in respect of lawyers may be performed only on the grounds of a court decision, and Article 182 of the Criminal Procedure Code of the Russian Federation, requiring that the court should be approached only in connection with the search of living quarters, enabled the law enforcement agencies to search law offices according to the general procedure without a court warrant.

In 2015 the Constitutional Court, invoking the legal position of the European Court of Human Rights, ruled that a search connected with access to the materials of law proceedings is possible solely on the basis of a court decision<sup>9</sup>.

However, without being enshrined in criminal procedure legislation, this formulation hardly affected the existing arrangements. In April 2017, an Article 450.1 was inserted in the Criminal Procedure Code, providing that a search, as well as an inspection and seizure in respect of a lawyer, are possible only after the initiation of a criminal case against that lawyer, on the grounds of a court decision and in the presence of a member of the bar association.

The searches at Moscow-based lawyer Maksim Zagorsky, carried out by the Federal Security Service even after the entry into force of these amendments, are a significant case in point. Attempting to use the well-tested pattern of performing a search in conditions of urgency, the investigators approached the Presnya Court of Moscow only after the fact of the searches, and it determined that they had

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<sup>9</sup> Judgment of the Constitutional Court of the Russian Federation No 33-II of 17 December 2015 on the case concerning a review of the constitutionality of Item 7 of the second part of Article 29, the fourth part of Article 165 and the first part of Article 182 of the Criminal Procedure Code of the Russian Federation in connection with a complaint of A.V. Balyan, M.S. Dzyuba and others.

acted within the law. However, the Moscow City Court granted an appeal lodged by the lawyer's defence, confirming the only possible procedure for searching a lawyer's premises: solely after obtaining a court warrant and in the presence of a member of the bar association<sup>10</sup>.

## **600 politically motivated searches**

*In preparing the present report, we analysed 600 cases of searches conducted at the homes of grassroots activists and members of persecuted organisations over the last three years (a table detailing the cases is annexed to the present report), which made it possible to get a general idea of the techniques applied by the law enforcement agencies.*

Searches have existed since times immemorial as a method of collecting evidence. In Russia, the term 'mask show' gained currency in the early 1990s, referring to a police search carried out with back-up from masked and armed Spetsnaz soldiers, as a tool of unfair competition and an effective means of pressuring partners or business rivals.

Probably one of the first cases of adapting this sort of practice to political cases was a criminal case against the management of the Media-Most Holding, as a result of which the State gained control over the NTV television channel. Between May 2000 and March 2001 officials of the Prosecutor General's Office, the Federal Security Service and the tax police carried out a series of searches of the Media-Most premises, the NTV offices and the homes of the holding's management members<sup>11</sup>.

After Media-Most, Mikhail Khodorkovsky's Open Russia Inter-regional Public Organisation was targeted for raids in the spring of 2006. By that time, the owner of the Yukos Oil Company was already convicted in the first criminal case and was held in a prison colony, but his organisation continued to function, having some 50 branches in most Russian regions<sup>12</sup>. On 17 March 2006 the Basmanny Court of Moscow froze the accounts of the non-profit organisation, and several sacks of financial documents were seized as a result of a series of searches at the Open Russia offices.

Unlike the business sector, where, as a rule, one of the principal objectives is to crush the competitor morally, a broader assignment is often set in political cases: to intimidate the activists, to deprive the leader of support, to hamper the work of the organisation.

Thus, no charges were brought against anybody on the basis of the results of the searches at Open Russia in 2006: this confirms the assumption that the actual objective of the authorities was precisely to neutralise the organisation and end its

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<sup>10</sup> [http://fparf.ru/news/all\\_news/news/42753/](http://fparf.ru/news/all_news/news/42753/)

<sup>11</sup> <http://origin.agentura.ru/timeline/2000/oligarh/?print=Y>

<sup>12</sup> Source: Wikipedia // [https://ru.wikipedia.org/wiki/Открытая\\_Россия](https://ru.wikipedia.org/wiki/Открытая_Россия)

public activity. As a rule, the whole range of intimidation methods is used to this end.

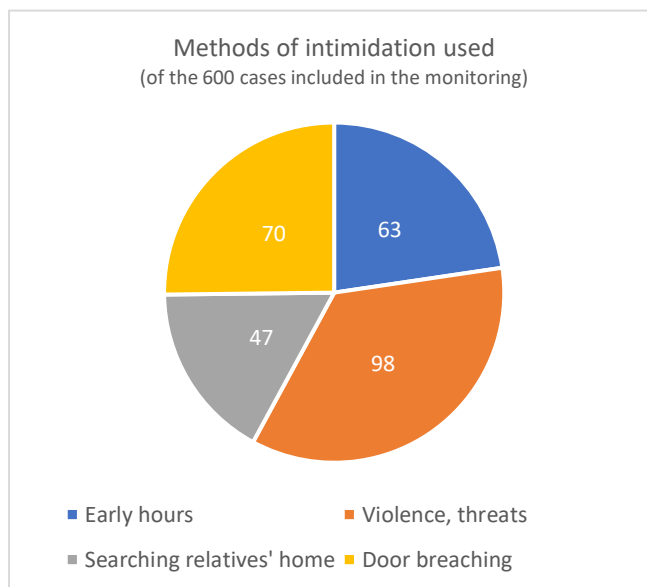
In May 2012, within the framework of the Bolotnaya Square Case, searches were carried out at the homes of the leaders of the protest Boris Nemtsov, Alexei Navalny and Ilya Yashin. None of them was charged in connection with the May 6 Case, but that was precisely the point at which the Investigative Committee could be said to have filled the niche of a main opposition persecutor, and searches at activists' homes became a mandatory element of pressure. Subsequently, activists in various regions of the country were subjected to so-called 'hub-and-spokes' searches under the Bolotnaya Square Case: in Ivanovo, Oryol and Novosibirsk in April 2013<sup>13</sup>, in Belgorod, Yaroslavl and Nizhny Novgorod Region in May<sup>14</sup>, and in Chelyabinsk, Perm and Yekaterinburg in July<sup>15</sup>.

The elements of intimidation used included: arriving for a search at an early hour of the day (in 63 cases the search began between 6 and 8 a.m.); using tools for forcible entry, violence and threats and brandishing weapons (98 cases); searching the homes of parents and other next of kin (47 cases); door breaching or forcible entry through windows (70 cases).

After a well-known episode in the summer of 2013, when, after trying in vain for several hours to get into a dwelling on Chistoprudny Boulevard which belonged to supporters of Moscow mayoral candidate Alexei Navalny, the Moscow police were forced to use a

circular saw, the power tool became emblematic of the Russian repressive apparatus.

The searches at the homes of Crimean Tatars are indicative in this respect: they are often carried out on a massive scale, early in the morning, involve Federal Security Service agents and Spetsnaz soldiers, breaching doors, barring the presence of lawyers, and not allowing telephone calls. Thus, as Krym.Realii reported, on 11 February 2016 Federal Security Service agents searched simultaneously eight Crimean Tatars' homes<sup>16</sup>. OVD-Info quoted Crimean Contact Group on Human Rights Coordinator Abdureshit Dzhapparov as saying:



<sup>13</sup> 'Bolotnaya Square Case' search carried out in Ivanovo. Lenta.ru. 2 April 2013 [in Russian] // <https://lenta.ru/news/2013/04/02/ivanovo/>

<sup>14</sup> Cartridges and drugs found during Bolotnaya Square Case searches, Investigative Committee Says. RIA Novosti. 14 May 2013 [in Russian] // <https://ria.ru/incidents/20130514/937213059.html>

<sup>15</sup> Bolotnaya Square Case searches carried out in a Number of Russian Cities. BFM.ru. 22 July 2013 [in Russian] // <https://glavupdk.bfm.ru/news/223052>

<sup>16</sup> In Crimea, FSB carries out 8 simultaneous searches of crimean tatars' homes – Lawyer. KrymRealii. 11 February 2016 [in Russian] // <https://ru.krymr.com/a/news/27545031.html>

‘The searches were carried out by masked people who stormed the home and forced doors and windows open, children were hurt.’ It was also reported that the occupants of the premises searched were refused access to lawyers and were ordered not to speak on the phone in Crimean Tatar<sup>17</sup>.

Along with Crimean Tatars, members of persecuted organisations are also frequently targeted for large-scale systematic searches. Police and, in a number of cases, Emergency Ministry officials, too, have raided premises of Open Russia (revived as an informal public movement), as well as premises and living quarters of members of the movement and their relatives, on not fewer than fifty occasions over the last three years.

Thus, on 5 October 2017 searches were carried out at the homes of the parents of Open Russia Chairman Aleksandr Solovyov, the chief editor of the website Openrussia.org Veronika Kutsyllo, system administrator Artyom Minich, the 18-year-old daughter of the editor of the Investigations Management Centre Andrei Konyakhin, the former member of the movement Nikolay Levshits, as well as at the offices of the Investigations Management Centre and Open Russia. A film crew of the REN-TV channel took part in the search at the office of Open Russia Executive Director Timur Valeyev, and Valeyev himself was pinned down by the operatives and his arms were twisted back<sup>18</sup>.

As noted above, the raids of activists’ homes and offices can pursue various objectives, one of which is to seize clearly non-criminal objects and information materials so as to hamper the organisation’s activity or wreck a campaign.

Thus, according to Leonid Volkov, head of Alexei Navalny’s presidential election campaign, since the summer of 2017 police have carried out not fewer than 150 raids of the offices of the Anti-Corruption Foundation and Alexei Navalny’s regional campaign offices which, after the opposition politician was denied registration as a presidential candidate, were transformed into centres organising a campaign in support of voters’ boycott.

Under the pretext of combating terrorism, the police seized leaflets, badges, newspapers, brochures and other canvassing material. The seizures often took place immediately before planned public actions. Several weeks after the seizure, the materials were returned as they were not found to contain extremist propaganda<sup>19</sup>.

Yet another goal of police searches is the confiscation of electronic devices and the subsequent unauthorised access to personal data, correspondence and social media accounts and messengers, contacts lists, meta data, etc. This is particularly

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<sup>17</sup> At least eight arrests made during searches of Crimean Tatars’ homes. OVD-Info. 11 February 2016 [in Russian] // <https://ovdinfo.org/express-news/2016/02/11/pri-obyskah-v-domah-krymskih-tatar-zaderzhali-ne-menee-vosmi-chelovek>

<sup>18</sup> Pavel Merzlikin. More searches for Open Russia. Meduza. 5 October 2017 [in Russian] // <https://meduza.io/feature/2017/10/05/v-otkrytyu-rossiyu-vnov-prishli-s-obyskami-ischut-sledy-sotrudnichestva-s-yukosom-i-nezheletelnymi-organizatsiyami>

<sup>19</sup> Forensics in Oryol didn’t find extremism in Navalny’s leaflets. Radio Liberty. 9 August 2017 [in Russian] // <https://www.svoboda.org/a/28667473.html>



relevant to foreign Internet service providers which refuse to disclose users' personal data and correspondence to the Russian authorities. Under the circumstances, the only way to link a post, say, on Facebook, to a particular person is to detect its digital footprint on an account on the subject's personal computer or smartphone accessible without a password.

The risk of operatives getting hold of gadgets compels users to adopt a different line of behaviour and precautions. For example, two-factor authentication of an account by telephone can no longer be considered safe.

On 11 June 2012 yet another search took place at Alexei Navalny's home, during which the Investigative Committee officials seized a laptop, tablet computers and mobile phones. Two weeks later, Navalny's Gmail electronic mail and Twitter account were hacked. Since the email account was linked to the number of the politician's seized smartphone, the sequence of events suggests that government officials may have been implicated in the hack. In 2015 a court in Germany found Sergei Maksimov, a.k.a. Hacker Hell, guilty of hacking. Several dozen bloggers and journalists became his victims, and according to many of them he was connected to the Russian authorities<sup>20</sup>.

'Finding' prohibited objects is yet another aspect of the politically motivated searches. A witness in the criminal case against The Other Russia activist Taisiya Osipova testified that the drugs found at her home in November 2010 were planted by operatives<sup>21</sup>. The same was asserted by the defence of Yabloko activist Kirill Bobrov, from whom a package of a 'green substance' was seized in March 2017<sup>22</sup>. Notably, in both cases the searches were performed by officials of the Centre for Combating Extremism.

Crimean activist Vladimir Baluh, who was sentenced to almost four years' imprisonment, insisted that the criminal case against him for unlawful possession of firearms and ammunition was a frame-up and that the cartridges and TNT bars 'seized' from the attic of his home had been planted<sup>23</sup>.

Untypical cases happen, too. For example, AGORA International lawyer Ilnur Sharapov said that during a search at the home of a person accused in a criminal case an investigator of the Federal Security Service seized a flash card which, upon inspection, was found to contain an audio recording of a conversation about plans of a sabotage involving the accused person. Apparently, keeping such compelling evidence in the case at home made no sense, and what most probably happened was that the investigator thus tried to legalise an audio recording made clandestinely by an agent infiltrated into the group.

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<sup>20</sup> *Olga Kuzmenkova*. Who's That Hell? The Trial in the Russian blogs hacking case started in Bonn: Meduza Report [in Russian] // <https://meduza.io/feature/2015/06/24/chto-za-hell>

<sup>21</sup> Witness tells court that drugs were planted on opposition activist Osipova during search. NEWSru.com. 13 August 2012 [in Russian] // <https://classic.newsru.com/russia/13aug2012/osipova.html>

<sup>22</sup> <https://ovdinfo.org/story/delo-kirilla-bobro>

<sup>23</sup> *Anton Naumlyuk*. 'They Are Tasked with Making Sure Everybody Is as Quiet as a Mouse': Why Vladimir Baluh Was Convicted. Krym.Realii. 4 August 2017 [in Russian] // <https://ru.krymr.com/a/28656409.html>

In recent years, police searches have become an element of campaigns conducted by the authorities not only against their political opponents but also against government officials. This is evidenced by the extensive coverage in State-controlled national TV channels of searches carried out at the homes of former regional governors Aleksandr Khoroshavin and Vyacheslav Gayzer, the head of the Federal Customs Service Andrei Belyaninov, and members of the Dagestani Government. Judging from what can be seen in the operational videos, the only difference between the searches at the homes of senior officials and at the homes of grassroots activists consists, basically, in the lavish interior design, the wads of money and the collections of expensive clocks. Otherwise, the routine is remarkably similar.

## **Summary**

Searches, inspections and other intrusions by government officials into living quarters and offices under various pretexts that have become an established practice in Russia, as well as statistics of court decisions warranting a breach of the inviolability of the home, demonstrate that there are no effective remedies for interferences of this type.

As a rule, the equipment seized during a search is difficult to recover. Canvassing materials lose their topical relevance, and the hardware, even if returned, has to be replaced on security considerations: there are no guarantees at all that the returned laptop or smartphone is not ‘bugged’.

Judicial oversight in this area is illusory, the appealability of a search, which exists on paper, is ineffective in practice. In 2010 the Constitutional Court of the Russian Federation, acting on a complaint by lawyer Denis Fyodorov, ruled that a person whose premises have been unlawfully searched has the right to claim compensation for the non-pecuniary damage caused by the unlawful actions of government authorities and officials and this right is asserted according to the general procedure. The Constitutional Court arrived at this conclusion despite the fact that the Criminal Procedure Code does not treat a search as a measure of restriction and, accordingly, does not extend the rules on rehabilitation to it.

And yet, considering especially the insignificant amount of the compensations, this does not solve the problem of protection. Just as in the case of surveillance, technological security arrangements provide a far more effective way of guaranteeing the inviolability of privacy. As a result, the activists living under a constant threat of search change their conduct: encrypting data storage media and no longer keeping ‘suspicious’ objects and information materials at home becomes a widespread practice.

Guidelines and recommendations on how to prepare and behave during a search are now readily available. One such instruction<sup>24</sup> of Team 29 begins with the words: ‘No one is immune from the risk of having his home searched...’



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The International Human Rights Group AGORA brings together several dozen lawyers from different countries specialising in legal protection of civil liberties in the post-Soviet space

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<sup>24</sup> What to Do When Police Search My Home? Team 29 website. 28 December 2015 [in Russian] // <https://team29.org/knowhow/obysk/>