



**УПОЛНОМОЧЕННЫЙ РОССИЙСКОЙ ФЕДЕРАЦИИ
ПРИ ЕВРОПЕЙСКОМ СУДЕ ПО ПРАВАМ ЧЕЛОВЕКА –
ЗАМЕСТИТЕЛЬ МИНИСТРА ЮСТИЦИИ РОССИЙСКОЙ ФЕДЕРАЦИИ**

**Representative
of the Russian Federation at
the European Court of Human Rights
– deputy Minister of Justice
of the Russian Federation**

**Représentant
de la Fédération de Russie auprès
de la Cour Européenne
des Droits de l'Homme – vice-ministre de
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Mr J.S. PHILLIPS
Third Section Registrar

European Court
of Human Rights

Application no. 29384/14
Sergeyev v. Russia

Dear Sir,

Please find attached the copy of the English translation of the observations of the Government of the Russian Federation.

Yours faithfully,

The Head of the Office of the Representative
of the Russian Federation at the European
Court of Human Rights – Deputy Minister
of Justice of the Russian Federation

Andrey Fedorov

TO THE EUROPEAN COURT OF HUMAN RIGHTS

SERGEYEV v. RUSSIA

**OBSERVATIONS OF THE GOVERNMENT OF THE RUSSIAN
FEDERATION AS TO THE ADMISSIBILITY AND ON THE MERITS
OF THE APPLICATION**

**Moscow
23 January 2019**

I. Introduction

On 7 September 2018 the European Court of Human Rights informed the Government of the Russian Federation of application no. 29384/14 *Sergeyev v. Russia* lodged with the Court under Article 34 of the Convention for the Protection of Human Rights and Fundamental Freedoms.

Pursuant to Rule 54 § 2 (b) of its Rules, the Court invited the Government to submit their observations and answer the following questions:

1. Does the loss of the applicant's things (eight icons and one silver plate) seized by the state authorities constitute the failure by the authorities to comply with their obligation to take reasonable measures necessary to preserve the seized property pursuant to Article 1 of Protocol No. 1 to the Convention (see *Dzugayeva v. Russia*, no. 44971/04, § 27, 12 February 2013)?
2. Does the refusal of the domestic courts to award compensation to the applicant for pecuniary damage due to the loss of the things, because the applicant could not specify the exact value of the missing things, constitute the violation of the applicant's right to respect for his property pursuant to Article 1 of Protocol No. 1 (*Dzugayeva v. Russia*, no. 44971/04, §§ 25–29, 12 February 2013, and also, *mutatis mutandis*, *Novikov v. Russia*, no. 35989/02, § 46, 18 June 2009), *Tendam v. Spain*, no. 25720/05, §§ 51–57, 13 July 2010, and *OOO KD-Konsalting v. Russia*, no. 54184/11, §§ 57–59, 29 May 2018)?

II. The Facts

1. On 27 April 2002 Yu.A. Sergeyev was arrested by the police officers at the railway station in Moscow, then he was taken to the Department of Internal Affairs of the Basmanniy District of Moscow ("Basmanniy Police Station"), where police officer [REDACTED] Z [REDACTED] conducted his personal search and seized eight icons and one oval silver plate from the applicant in the presence of the attesting witnesses.
2. In 2008 Yu.A. Sergeyev filed a claim to the Basmanniy District Court of Moscow against the Basmanniy Police Station, the Ministry of Internal Affairs of the Russian Federation, the Ministry of Finance of the Russian Federation seeking monetary compensation for non-pecuniary damage, reclamation of icons from another's unlawful possession. In support of the claims for compensation for non-pecuniary damage, he specified that actions of the officer of the Basmanniy Police Station on his arrest, search and seizure of the icons and oval plate were unlawful.
3. The compensation for non-pecuniary damage in the amount of RUB 5,000, the expenses for payment of state fee in the amount of RUB 100, travel costs in the amount of RUB 14,715.10 were recovered by the Basmanniy District Court of Moscow on 19 December 2008 in his favour from the Treasury of the Russian Federation represented by the Ministry of Finance of the Russian Federation. The claims of Yu.A. Sergeyev against the Basmanniy Police Station, the Ministry of Internal Affairs of the Russian Federation seeking monetary compensation for non-pecuniary damage and reclamation of icons from another's unlawful possession were dismissed.
4. On 19 March 2009 the Judicial Division for Civil Cases of the Moscow City Court upheld the judgment of the first-instance court.
5. Yu.A. Sergeyev filed a claim to the Tverskoy District Court of Moscow against the Ministry of Internal Affairs of the Russian Federation, the Ministry of Finance of the Russian Federation for recovery of the value of eight icons and a silver oval plate in the amount of RUB 8,500,000, compensation for non-pecuniary damage in the amount of RUB 5,000,000.
6. On 29 July 2009 the Tverskoy District Court of Moscow ruled to replace the respondent — Ministry of Finance of the Russian Federation - with the

appropriate one — the Ministry of Internal Affairs of the Russian Federation; the case was forwarded according to jurisdiction to the Zamoskvoretskiy District Court of Moscow.

7. On 18 November 2009 the Zamoskvoretskiy District Court of Moscow dismissed Yu.A. Sergeyev's claims.

8. On 20 May 2010 the Judicial Division for Civil Cases of the Moscow City Court quashed the judgment of the first-instance court, and the case was remitted for fresh examination.

9. On 5 April 2011 the Zamoskvoretskiy District Court of Moscow dismissed Yu.A. Sergeyev's claims against the Ministry of Internal Affairs of the Russian Federation, the Ministry of Finance of the Russian Federation for the recovery of funds, compensation for non-pecuniary damage, travel costs.

10. On 30 August 2011 the Judicial Division for Civil Cases of the Moscow City Court upheld the judgment of the Zamoskvoretskiy District Court of Moscow of 5 April 2011.

11. On 2 August 2013 the Moscow City Court refused to refer Yu.A. Sergeyev's cassation appeal against the judgment of the Zamoskvoretskiy District Court of Moscow of 5 April 2011 and the ruling of the Judicial Division for Civil Cases of the Moscow City Court of 30 August 2011 for its consideration by a court of cassation.

12. On 28 October 2013 the Supreme Court of the Russian Federation refused to refer Yu.A. Sergeyev's cassation appeal against the judgment of the Zamoskvoretskiy District Court of Moscow of 5 April 2011 and the ruling of the Judicial Division for Civil Cases of the Moscow City Court of 30 August 2011 for its consideration by a court of cassation.

III. The Law

Arguments on the applicant's omission of the six-month period for lodging an application

1. Article 35 § 1 of the Convention stipulates that the Court may only deal with the matter within a period of six months from the date on which the final decision was taken by the domestic authorities.
2. The purposes of that rule were repeatedly explained by the Court in its case-law. They are (a) to maintain legal certainty by ensuring that cases raising issues under the Convention are examined within a reasonable time, and to prevent the authorities and other persons concerned from being kept in a state of uncertainty for a long period of time, (b) to afford the prospective applicant time to consider whether to lodge an application and, if so, to decide on the specific complaints and arguments to be raised, (c) to facilitate the establishment of facts in a case, since with the passage of time, any fair examination of the issues raised is rendered problematic, and (d) to mark out the temporal limit of the supervision exercised by the Court and signals, both to individuals and State authorities, the period beyond which such supervision is no longer possible¹.
3. The Government of the Russian Federation would like to note in particular that, in order to properly and effectively consider the present case and the possible restoration of the applicant's rights both at the domestic level and at the level of the court of international instance, taking into account the alleged seizure of the applicant's property, without providing him with any documents confirming the commission of these actions, the applicant should have taken any actions aimed at returning the relevant property as soon as possible.
4. However, as follows from the documents submitted by the applicant, his arrest by the police officers took place on 27 April 2002, yet Yu.A. Sergeyev applied to the court for the restoration of the violated rights as late as in 2008, when it was difficult to restore the sequence of events in connection with the remoteness of the disputed event.

¹ *Sabri Güneş v. Turkey* [GC], no. 27396/06, §§ 39, 40, 29 June 2012.

5. Meanwhile, according to the applicant, since 2002 he had repeatedly appealed to the district courts of Moscow (Basmanniy, Tverskoy, Zamoskvoretskiy) due to his arrest on 27 April 2002 by police officers at the railway station of Moscow and seizure of his things. However, the applicant had not submitted any documents confirming these appeals and correspondence with the courts.

6. At the same time, according to the Moscow City Court, the applicant's appeals related to this fact were not received, no correspondence was held with him.

7. It follows from the applicant's conduct that he did not suffer any significant harm and that the property allegedly seized from him by the police officers was of no value to him.

8. In view of the foregoing, taking into account the fact that the events contested by the applicant took place in April 2002, and the applicant appealed against them as late as in the end of 2008, i.e. **more than 6 years later**, the application was lodged by Yu.A. Sergeyev with the European Court of Human Rights in March 2014, i.e. **12 years** after the disputed event, as well as the fact that, given the time which elapsed, any fair consideration of the issues raised seems problematic, the Government of the Russian Federation believe that the applicant missed the six-month period for lodging an application with the Court, and therefore his application should be dismissed.

Answer to question no. 1

13. The Government of the Russian Federation primarily would like to draw the attention of the Court to the fact that it is impossible to provide the detailed information on the present case, since the administrative materials, including those relating to the applicant, were destroyed in 2007, and the log books of statements and reports of crimes, administrative offences, incidents and accounting books for 2002 were destroyed in 2011, based on the order of the Ministry of Internal Affairs of the Russian Federation of 12 May 2016. All information provided in the case will be based on the documents submitted by the domestic courts that examined the applicant's civil cases.

14. In view of the foregoing, the Government of the Russian Federation would like to report the following.
15. On 19 December 2008 the Basmanniy District Court of Moscow considered the civil case following the claim of Yu.A. Sergeyev against the Basmanniy Police Station, the Ministry of Internal Affairs of the Russian Federation, the Ministry of Finance of the Russian Federation seeking monetary compensation for non-pecuniary damage, reclamation of icons from another's unlawful possession.
16. The court found that on 27 April 2002 in the afternoon, Yu.A. Sergeyev had been taken on suspicion of committing a crime to the police control room by the officers of the municipal police, he had been searched, and the icons had been found in his hand luggage. The icons (8 pieces) and oval plate had been seized from Yu.A. Sergeyev by police major [REDACTED] Z [REDACTED] in the presence of attesting witnesses D.D. Blinov, A.V. Makogon.
17. Furthermore, for establishment of all circumstances of the case within consideration of this civil case, the Ministry of Internal Affairs conducted official investigation during which the following was established. In accordance with the report of [REDACTED] Z [REDACTED] compiled in connection with the official investigation on 27 April 2002, [REDACTED] Z [REDACTED] was on duty as part of the operational investigative group. In the afternoon, Yu.A. Sergeyev was taken on suspicion of committing a crime to the police control room by the officers of the municipal police, he was searched, and the icons were found in his hand luggage. [REDACTED] Z [REDACTED] inspected the icons, a seizure report was drawn up. Yu.A. Sergeyev, the icons and compiled materials were left near the police control room, as [REDACTED] Z [REDACTED] was called as a part of the operational investigative group to respond to the scene.
18. The court also found that there were no documents in the civil case of the applicant that could confirm the existence of the disputed property or its seizure, in connection with their destruction after the expiration of the established period of storage.
19. The specified factual circumstances were not challenged by the parties.
20. In such circumstances, the court came to the conclusion that at the time of the consideration of the case, there were no icons and oval plate seized from

Yu.A. Sergeyev upon his taking to the Basmanniy Police Station on 27 April 2002 in the Basmanniy Police Station, they were not transferred to specialised bodies for storage. These circumstances were ascertained by the evidence collected in the case, including official investigation materials.

21. Pursuant to Article 301 of the CC RF, an owner may reclaim his/her property from another's unlawful possession.

22. Within the meaning of this Article, the owner may reclaim his/her property from a person who actually unlawfully possesses such property.

23. No evidence ascertaining the fact that the disputed property was possessed by the respondent, was provided by the plaintiff or established by the court.

24. In this regard, since Yu.A. Sergeyev filed the claim for reclamation of the property against the entity that unlawfully possessed such property in April 2002, but that did not possess such property at the moment of consideration of the case, the claim of the plaintiff for the reclamation of the icons (eight pieces) and an oval plate seized according to the seizure report from the Basmanniy Police Station should be dismissed.

25. Therefore, there were no grounds for reclamation of the things seized in the Basmanniy Police Station.

26. The Government of the Russian Federation also would like to note that the things and documents may be seized from a citizen only in cases provided for by law.

27. Thus, neighbourhood police officer, police major [REDACTED] Z [REDACTED] mentioned in the claim of Yu.A. Sergeyev upon being questioned reported that in 2002 he had held the position of the senior criminal investigator of the criminal investigation unit of the Basmanniy Police Station. Regarding the arrest of Yu.A. Sergeyev in 2002 and the seizure of his property, he indicated that during the service, when he had to arrest citizens for committing various crimes and administrative offences, he acted in accordance with the current legislation.

28. In accordance with Article 244 of the Code of the RSFSR on Administrative Offences in force until June 2002, the things and documents which are the tool or direct object of the offence found upon arrest, personal

search or examination of things shall be seized by the officials of the bodies provided for in Articles 241 and 243 of this Code.

29. By virtue of Article 81 § 4 of the Code of Criminal Procedure of the Russian Federation, in force until 29 May 2002, things seized during pre-trial proceedings but not recognized as material evidence shall be returned to the persons they were seized from.

30. It follows from the report of the Criminal Record Information Centre of the Main Internal Affairs Directorate in Moscow of 9 December 2008 that Yu.A. Sergeyev did not bring to the criminal or administrative responsibility in the territory of Moscow.

31. In this regard, the Government of the Russian Federation believe that the applicant's arguments about the seizure of the disputed property from him are generally quite doubtful.

32. However, in accordance with Article 151 of the CC RF, if a citizen has been inflicted non-pecuniary damage (physical or moral sufferings) due to the actions violating his/her personal non-property rights or infringing upon other non-material values in his/her possession, as well as in other cases stipulated by law, the court may oblige the offender to pay monetary compensation for the said damage.

33. Due to the fact that it was found during the consideration of the case that Yu.A. Sergeyev was not brought to criminal or administrative responsibility, the court concluded that the officers of the Basmanniy Police Station took him to the police control room, searched him and seized the icons and oval plate, which were not the subject of administrative offence or material evidence in a criminal case without sufficient grounds.

34. The court recognized the arguments of the plaintiff about moral and physical sufferings by the actions of the officers of the Basmanniy Police Station as substantiated. Therefore, the damage caused as a result of the above mentioned actions was subject to compensation in the manner prescribed by Article 1069 of the CC RF.

35. In accordance with Article 1069 of the CC RF, damage caused to an individual or a legal entity as a result of unlawful actions (omission) of state authorities, local self-government authorities or their officials, including

damages resulting from the issuance of an act of a state authority or local self-government authority contrary to a law or other regulatory act, shall be subject to compensation. The damage shall be compensated at the expense of the Treasury of the Russian Federation, a treasury of the constituent entity of the Russian Federation, or a treasury of a municipal authority, respectively.

36. By virtue of Article 1070 § 2 of the CC RF, damage inflicted to a citizen or a legal entity as a result of illegal actions of inquiry authorities, preliminary investigation bodies, or prosecutor's offices which have not entailed the consequences provided for by § 1 of the present Article shall be compensated on the grounds and in the manner stipulated by Article 1069 of the CC RF.

37. Determining the amount of compensation for non-pecuniary damage, the court took into account the degree of fault of the offender and the degree of physical and moral sufferings caused to Yu.A. Sergeyev in connection with the application of such measures to him as delivery, personal search, examination of things.

38. Taking into account the above, as well as in accordance with the requirements of proportionality, reasonableness and justice, the court found it necessary to recover compensation for non-pecuniary damage from the Treasury of the Russian Federation represented by the Ministry of Finance of the Russian Federation in the amount of RUB 5,000 in favour of Yu.A. Sergeyev.

39. These findings of the first-instance court were confirmed in the ruling of the Judicial Division for Civil Cases of the Moscow City Court of 19 March 2009 which upheld the judgment of the Basmanniy District Court of Moscow of 19 December 2008, and dismissed the cassation appeal of Yu.A. Sergeyev.

40. In view of the foregoing, the Government of the Russian Federation believe it possible to make a reasonable conclusion that in the present case neither the fact of loss of property belonging to the applicant nor its alleged seizure by the state authorities were established. Therefore, there is no evidence of non-compliance by the authorities with their obligation to take the reasonable measures necessary to preserve the seized property in accordance with Article 1 of Protocol No. 1 to the Convention.

Answer to question no. 2

41. After the refusals to grant his claims against the Ministry of Internal Affairs of the Russian Federation, Yu.A. Sergeyev filed a claim to the court against the Ministry of Internal Affairs of the Russian Federation, the Ministry of Finance of the Russian Federation for recovery of the value of eight icons and a silver oval plate in the amount of RUB 8,500,000, compensation for non-pecuniary damage in the amount of RUB 5,000,000.

42. The property was assessed by the applicant at his own discretion, no documents that could confirm the value of the disputed property were submitted by him.

43. To confirm the amount of his claims, Yu.A. Sergeyev also attached the seizure report regarding disputed property to his claim. However, this document was not attached to the materials sent by the applicant to the Court. The Government of the Russian Federation explain this by the fact that the seizure report does not contain information on the value and cost of the icons, and that they are made of valuable precious metals.

44. The copy of the seizure report of 27 April 2002, submitted by the plaintiff, does not contain any information about the artistic value of the things either.

45. In this regard, on 12 November 2010 the Zamoskvoretskiy District Court of Moscow commissioned an art expertise, relevant questions were raised to the experts, which would allow assessing the value of the disputed property. However, the civil case-file was returned by ANO "Centre of Forensic Examinations" by cover letter no. 1944 of 28 December 2010 without execution due to the impossibility to conduct expertise on the issues raised due to the lack of materials in the case for examination.

46. In accordance with Article 91 § 2 of the Code of Civil Procedure of the Russian Federation, the price of the claim shall be indicated by the plaintiff, and its determination on property disputes shall be a mandatory requirement for the claim, since the price of the claim is understood as a monetary value of the disputed property, based on which the amount of the state fee is determined, and the failure to indicate the price in the claim shall be the basis for dismissing the

claim by virtue of Article 136 of the Code of Civil Procedure of the Russian Federation.

47. In accordance with Article 12 of the CC RF, the civil rights shall be protected, in particular, by compensation for losses. In accordance with 15 § 2 of the CC RF, the losses shall mean the expenses that a person, whose right was violated, paid or will have to pay to restore the violated right, the loss or damage to his property (actual damage), the lost income that the person would have received in the ordinary conditions of civil transactions if his/her right was not violated (lost profit).

48. In accordance with the requirements of Article 56 § 1 of the Code of Civil Procedure of the Russian Federation, a party has to prove circumstances to which he/she refers in support of his/her claims or objections, unless otherwise prescribed by federal law. In this regard, Yu.A. Sergeyev as the plaintiff had to prove the amount of actual damage caused to him.

49. When making decision, the court, in full compliance with Article 67 § 4 of the Code of Civil Procedure of the Russian Federation, reflected the result of assessing the collected evidence in the judgment, came to the conclusion that the amount of actual damage claimed by the plaintiff was not confirmed during the trial, as Yu.A. Sergeyev failed to submit sufficient and valid evidence to meet the requirements of relevance and admissibility in violation of the provisions of article 56 of the Code of Civil Procedure of the Russian Federation.

50. In addition, the Zamoskvoretskiy District Court of Moscow did not establish the grounds for granting the claims of Yu.A. Sergeyev seeking compensation for non-pecuniary damage, since this claim is derived from the main claim which was dismissed. At the same time, the court considered that the claim of Yu.A. Sergeyev seeking compensation for non-pecuniary damage in connection with unlawful actions of the officers of the internal affairs bodies was granted by the Basmanniy District Court of Moscow in its final judgment of 19 December 2008.

51. Thus, the refusal of the domestic courts to award compensation to the applicant for pecuniary damage due to the loss of things, on the grounds that the applicant could not specify the exact value of the missing things, is justified.

Consequently, there is no violation of the applicant's right to respect for his property in accordance with Article 1 of Protocol No. 1 in the present case.

Arguments on the applicant's non-exhaustion of available effective remedies

52. As was stated earlier, in the period from 2002 to 2008, i.e. from the moment when the applicant had become aware of his violated right, the applicant did not apply to the courts of the Russian Federation, and did not use other remedies.

53. The Constitutional Court of the Russian Federation indicated in paragraph 3.2. of Resolution no. 9-P of 16 July 2008 *On verification of constitutionality of the provisions of Article 82 of the Criminal Procedural Code of the Russian Federation in connection with the complaint lodged by V.V. Kostyshev*: "Addressing the issue of the admissibility of the seizure of property from the owner or legal owner by decision of a state body or official engaged in the prevention, suppression or solution of an offence, the Constitutional Court of the Russian Federation formulated a legal position according to which the temporary seizure of property, which is a procedural interim measure and does not give rise to the transfer of ownership of property, may not be regarded as a violation of constitutional rights and freedoms, including as a violation of property rights, while the persons in whose respect such measures are applied, associated with the limitation of the right, title and interest in property, have the right to appeal against relevant decisions and actions in court as stipulated by Article 46 (§ 2) of the Constitution of the Russian Federation."

54. According to Article 123 § 1 of the Code of Civil Procedure of the Russian Federation, actions (or omission) and decisions of the inquiry body, inquiry officer, head of the inquiry body, investigator, head of the investigative authority, prosecutor and court may be appealed against in the manner prescribed by the Code of Civil Procedure of the Russian Federation by the participants of the criminal proceedings as well as other persons to the extent in which procedural actions taken and procedural decisions affect their interests.

55. The applicant or his representatives did not appeal against the decisions of the investigator, the head of the investigative body, the prosecutor, their actions (omission) in connection with the arrest and search on 27 April 2002, as

well as the seizure of property of Yu.A. Sergeyev, to the courts of Moscow in the manner prescribed by Article 125 of the Code of Civil Procedure of the Russian Federation.

56. Thus the applicant failed to fully exercise the right to the judicial protection guaranteed by Article 46 of the Constitution of the Russian Federation.

57. In addition to these ways of protection, the applicant did not file any statement about the commission of unlawful actions by the officers of the internal affairs bodies during arrest for an administrative offence to the Internal Security Department of the Main Directorate of the Ministry of Internal Affairs of Russia for Moscow, as well as the Internal Security Division of the Department of Internal Affairs for the Central Administrative District of the Main Directorate of the Ministry of Internal Affairs of Russia for Moscow for a long time, namely from 2002 to 2019 (more than 16 years), i.e. from the moment when the applicant became aware of the above-mentioned fact, since he was directly involved in the events, i.e. in the period from 27 April 2002 to the present time. No criminal case on this fact was initiated.

58. The period during which the applicant did not show any interest in the application of a possible method of protection of his rights is more than 16 years (see, *mutatis mutandis*, *Gadzhikhanov and Saukov v. Russia*:² the applicants, since 2000 and 2008 respectively, have not taken any steps to recover the judgments debts; see also, *mutatis mutandis*, *Li v. Russia*:³ the applicant since 2003 till 2007 has not taken any steps to recover the judgment debt).

59. Consequently, the applicant failed to exhaust effective domestic remedies before appealing to the court of international jurisdiction in violation of Article 35 § 1 of the Convention; on that ground the application shall be dismissed as manifestly inadmissible.

² *Gadzhikhanov and Saukov v. Russia*, cited above, 31 January 2012, § 24.

³ *Li v. Russia*, no. 38388/07, 24 April 2014, § 16.

IV. Conclusion

In view of the foregoing, the Government of the Russian Federation

SUBMIT:

that Yu.A. Sergeyev's application alleging violation of his rights guaranteed by Article 1 of Protocol No. 1 to the Convention is inadmissible within the meaning of Article 35 § 1 of the Convention due to the failure to comply with the six-month rule;

that Yu.A. Sergeyev's application alleging violation of his rights guaranteed by Article 1 of Protocol No. 1 to the Convention is inadmissible within the meaning of Article 35 § 1 due to the failure to exhaust the effective domestic remedies before appealing to the international court;

that Yu.A. Sergeyev's application alleging violation of his rights guaranteed by Article 1 of Protocol No. 1 to the Convention is manifestly ill-founded within the meaning of Article 35 § 3 (a) of the Convention.

ASK:

to recognize Yu.A. Sergeyev's application alleging violation of his rights guaranteed by Article 1 of Protocol No. 1 to the Convention inadmissible due to the failure to comply with the six-month period for lodging an application, as well as non-exhaustion of the effective domestic remedies before appealing to the international court;

to dismiss Yu.A. Sergeyev's application alleging violation of his rights guaranteed by Article 1 of Protocol No. 1 to the Convention in full under Article 35 § 3 (a) and § 4 of the Convention.

Appendix: on

Representative of the Russian Federation
at the European Court of Human Rights —
Deputy Minister of Justice
of the Russian Federation

M.L. Galperin