

BRIEF

Amendments to Russia's Code on Administrative Offenses¹

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On June 3, 2026, the Russian Federation Council approved a federal law amending the Code on Administrative Offenses (CoAO) (the amendments). Once signed by the president, the amendments will enter into force on September 1, 2026.

The amendments significantly expand Russia's extraterritorial administrative jurisdiction over persons and entities outside Russia, including Russian citizens abroad, foreign citizens, stateless persons, and foreign legal entities. They also introduce a powerful new enforcement mechanism—the arrest of property—to ensure compliance with administrative penalties imposed in proceedings where the person concerned may be outside Russia.

The law targets individuals and organizations that have committed certain existing administrative offenses outside Russia's borders or that fail to pay fines imposed for such offenses. It enables Russian courts to freeze the assets of persons located abroad, including their bank accounts and other property held within Russia, without requiring their physical presence at proceedings.

This brief summarizes the key provisions of the law and their potential implications for civil society actors, journalists, and others who have relocated abroad.

Key changes include:

I. Expanding the list of administrative offenses committed outside Russia for the extraterritorial application of Russian administrative liability

The amendments expand the list of administrative offenses committed by individuals and foreign legal entities outside Russia that are subject to extraterritorial administrative liability (to 16, from 4 under the previous version of the CoAO) where the conduct is considered to be “directed against the interests of the Russian Federation,” as well as in instances provided for by international treaties, if a person has not already been held criminally or administratively liable for the same conduct in a foreign state.

¹ Interpretations and definitions are based on unofficial English translations of the Russian text.

The list of newly covered offenses includes, among others:

- illegal acquisition of restricted-access information;
- abuse of freedom of mass information;
- violations related to the dissemination of information online or through information systems;
- public statements equating actions of the Soviet Union’s leadership with those of Nazi Germany;
- disclosure of information about judges, law enforcement officials, and other protected persons;
- incitement of hatred, calls to violate Russia’s territorial integrity, “discrediting” the Russian Armed Forces or state bodies acting abroad, and sanctions-related calls; and
- production or dissemination of “extremist” materials.

Previously, administrative liability for individuals applied only to violations of rules for “foreign agents” and participation in the activities of an “undesirable” organization, if committed outside Russia. Administrative liability for offenses committed outside Russia by foreign legal entities included transactions or financial operations involving assets received illegally in the interests of a legal person, and illegal remuneration on behalf of a legal person.

Administrative liability also applies to non-payment of administrative fines imposed for the listed offenses.

2. Applying administrative penalties for certain offenses committed outside Russia to foreigners, persons without citizenship, and foreign legal entities

Foreign citizens, stateless persons, and foreign legal entities may be held liable for an expanded list of administrative offenses committed outside Russia (see Section 1), or for failure to pay penalties for such offenses. Previously, such liability applied only in limited cases against foreign legal entities.

The new provision is especially relevant if a foreign citizen has property in Russia that may be arrested (see Section 3).

3. Creating a broader mechanism for the arrest of property

The rewritten Article 27.20 of the CoAO establishes a mechanism for arresting property to secure enforcement of administrative sanctions for the offenses listed in Section 1, as well as for failure to pay penalties and mandatory expenses related to these offenses.

The amendments do not specify how long property may remain under arrest. A court may lift the arrest at the request of the prosecutor, the penalized person, or the person’s representative.

The arrest of property consists of a prohibition on disposing of the arrested property and, where necessary, restrictions on possession or use. In practice, the measure may prevent a person or entity from selling, transferring, accessing, or otherwise using property while the administrative case or enforcement process is pending. Property remaining in Russia may include funds in bank accounts, apartments, business shares, shares in co-owned property, cars, and other assets.

For the listed extraterritorial offenses, the value of the arrested property is not limited to the amount of the administrative fine. This is a significant escalation, as the property may be arrested even when the value of the asset exceeds the penalty amount.

The amendments also prioritize the arrest of money held in bank accounts and deposits. For the listed offenses, authorities may first arrest funds held in banks or other credit institutions; if such funds are absent, other property may be arrested.

If the person who has relocated abroad does not have property within Russian jurisdiction, the notice of the obligation to pay an administrative penalty remains in the person's database. This may impede the person's use of consular services abroad (such as replacing an expired passport, issuing power of attorney, or obtaining a certified copy of a diploma).

4. Allowing rapid judicial consideration of property-arrest motions

A key change is that a court may order the arrest of property before considering the underlying administrative case, at the request of, for example, a prosecutor, the Ministry of Justice, or a tax authority conducting the administrative investigation. When an administrative investigation is opened, the motion may be filed at the same time as the decision initiating that investigation.

The judge must consider the motion no later than the day after it is received, and, notably, the law permits the motion to be considered without notifying the person concerned. If granted, the arrest order becomes an enforcement document executed through enforcement proceedings. The order may be appealed, but a deferral or installment arrangement for the fine is not a basis for lifting the arrest.

5. Facilitating proceedings against persons located abroad

At the preparatory stage, the court or other competent authority must determine whether the person is in Russia and, if the person is abroad, whether proper notice can be given under the CoAO. If the person is outside Russia and proper notice is not possible, participation of a defense lawyer is mandatory in covered cases. The judge, authority, or official handling the case must take steps to appoint counsel. The cost of appointed defense counsel, including travel, accommodation, and per diem expenses, is treated as a case expense and, as a general rule, is charged to the person found administratively liable.

In addition, the amendments provide that such cases are to be heard at the location of the authority that initiated the case. If a person is abroad and it is not possible to obtain their signature on a seizure protocol for documents or other items, the protocol may simply record that fact instead.

The amendments also accelerate the enforceability of decisions in these cases. Covered administrative penalty decisions enter into legal force from the day they are issued, rather than only after the ordinary appeal period. This may allow authorities to move more quickly from a decision imposing a fine to enforcement measures, including the continued use of arrested property to secure payment.

Finally, the amendments clarify that certain sanctions that are difficult or impossible to apply to persons abroad (including administrative arrest, compulsory work, administrative suspension of activity, and certain confiscation measures) do not apply in specified extraterritorial cases when the person is outside Russia at the time of consideration. As a consequence, such cases are likely to focus on monetary penalties, backed by the new mechanism for arresting bank funds and other property.

Conclusion

Overall, the amendments significantly expand the enforceability of Russian administrative law against persons and entities outside of Russia, with a particular focus on so-called “political” offenses, such as violations of regulations governing “foreign agents,” participation in the activities of “undesirable” organizations, dissemination of broadly defined “extremist materials,” or advocacy against Russia’s war on Ukraine or in support of international sanctions against Russia. Russian experts [believe](#) that these new measures are designed to silence vocal exiles. The broad formulation of covered conduct and the undefined reference to acts directed against Russia’s interests may create substantial uncertainty for individuals, organizations, and others outside Russia who retain assets or accounts within Russian jurisdiction.