

Legal Grey Zone Exploitation And The Silent Displacement Of A Population: Reframing Russia's Passportization Policy¹ In Georgia's Breakaway Regions

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Abstract

This article examines Russia's "passportization policy" in Georgia's breakaway regions of Abkhazia and Tskhinvali,² analyzing it as a strategic legal maneuver aimed at undermining Georgian sovereignty through non-military means. Moving beyond conventional analyses of naturalization as a humanitarian or identity-based act, the paper introduces two original concepts – legal grey zone exploitation and silent displacement through legal absorption – to explain how Russia has capitalized on Georgia's post-Soviet legal and institutional fragility. By issuing passports *en masse* to Georgian citizens residing in the contested territories, Russia displaced Georgian jurisdiction and redefined political allegiance without altering borders or deploying overt force. Drawing on international legal principles, Georgian domestic law, and Russian citizenship legislation, the analysis reveals a calculated manipulation of legal ambiguity and transitional periods to assert *de facto* sovereignty. The paper challenges the claim of statelessness among the local Abkhaz and Ossetian populations and highlights the disconnect between legislative intent and institutional capacity in early Georgian statehood. Through this Georgia-centered lens, the study offers an interpretation of passportization as a tool of hybrid legal warfare – one that blurs the boundaries of identity, legality, and territorial control. The findings have broader implications for understanding how extraterritorial citizenship policies can silently erode the foundations of state sovereignty under the guise of legality.

Keywords – Abkhazia, Citizenship, Hybrid warfare, Passportization, Sovereignty, Tskhinvali region

INTRODUCTION

Russia's "passportization policy" in Georgia's breakaway regions of Abkhazia and Tskhinvali has emerged as one of the most subtle yet powerful tools of statecraft in the post-Soviet space. Through the mass naturalization of Georgian citizens, Russia redefined the legal status and political allegiance of populations in the contested territories. While this practice has often been interpreted through geopolitical or humanitarian lenses, its legal implications – particularly in the Georgian context – remain underexplored. The study contributes to international legal scholarship by introducing two novel concepts: (1) "legal grey zone exploitation," referring to the strategic use of legal ambiguity to intervene in another state's jurisdiction, and (2) "silent displacement through legal absorption," where individuals are reclassified through foreign citizenship rather than through physical expulsion or annexation. By centering these concepts in the Georgian experience, this paper offers a deeper, state-specific account of how sovereignty, legality, and identity are manipulated in contemporary hybrid conflicts.

Methodologically, this study combines legal-textual analysis with conceptual development rooted in political theory. It examines primary legislation, international legal instruments, and secondary legal interpretations, applying them through the lens of post-Soviet state fragility and contested sovereignty. This approach enables a nuanced interpretation of how legal tools were operationalized for identity displacement and jurisdictional substitution.

While Russia's passportization policies have manifested in other contested regions – such as Transnistria, Crimea, and Donbas – this article deliberately narrows its focus to the Georgian context. This choice reflects the need for a deeper, case-specific understanding of how extraterritorial citizenship functions in the absence of direct annexation. The Georgian experience offers a unique case of legal appropriation without full territorial integration, allowing for the development of original conceptual frameworks such as legal grey zone exploitation and silent displacement through legal absorption. Rather than dilute the analysis through cross-case comparison, this study aims to produce a detailed, Georgia-centered model that may inform broader comparative work in future research.

Theoretical and Legal Framework

To assess the legality and implications of Russia's passportization policy in Georgia, this paper adopts an interdisciplinary legal-political framework that draws from both international law and constructivist theories of identity.

From a legal standpoint, the core international principles at stake include state sovereignty, non-intervention, and the requirement of a genuine link between a person and the state conferring nationality (ILC Draft Articles on Diplomatic Protection, 2008). These norms are foundational to the international legal order and are routinely violated when citizenship is used as a geopolitical instrument.

From a theoretical perspective, this paper builds on constructivist approaches to show how legal categories – such as citizenship – are not just juridical tools, but also instruments of identity construction and political alignment. The act of naturalization, especially under extraterritorial conditions, reshapes not only legal affiliations, but also cultural and symbolic attachments. Through policies promoting the Russian language, education, and economic dependency, Moscow reinforces the identity shift initiated by passportization. This dual framework enables us to view Russia's policy not simply as a legal irregularity, but as a "state-sponsored identity transformation project," executed through the technical machinery of citizenship law. It also allows us to analyze how Georgia's fragile state-building process left gaps – "legal grey zones" – that Russia was able to exploit.

By synthesizing legal doctrines with socio-political theory, this paper reveals the multi-layered nature of passportization in the Georgian context. Georgia's case demonstrates not merely document issuance, but a systematic attempt to replace Georgian jurisdiction with Russian legitimacy, not by force of arms, but by the slow erosion of legal identity through paperwork, policy, and presence.

A Legal Triangle: The Russian Passportization Policy and Conflicting Legal Frameworks

Russia's "passportization policy" in Georgia's breakaway regions represents not merely a legal irregularity, but a strategically orchestrated intervention in a sovereign legal order. This section examines how the policy intersected with and ultimately contradicted three key legal frameworks: international law, Georgian domestic law, and Russia's own citizenship laws. More than a legal anomaly, this practice exemplifies what this paper terms "legal grey zone exploitation" – the deliberate manipulation of overlapping legal systems and institutional weaknesses to assert geopolitical influence without overt military action. This analysis focuses exclusively on how the specific post-Soviet legal vacuum in Georgia enabled Russia's long-term encroachment. Russia's policy did not rely on direct confrontation, but instead proceeded through the slow erosion of legal identity, a process we define as "silent displacement through legal absorption." In this sense, citizenship was used not only to establish extraterritorial loyalty, but to overwrite the legal and symbolic relationship between the Georgian state and its residents in Abkhazia and the Tskhinvali region. Scholars such as Anne Peters (2023) and Kentaro Nagashima (2017) have emphasized that these practices represent a growing challenge to the international legal system. Peters argues that extraterritorial naturalization without meaningful links constitutes a form of *de facto* annexation and contributes to the erosion of norms surrounding state sovereignty and non-intervention. This view is echoed by Bauböck (2019) and Harpaz (2019), who describe such policies as examples of "strategic citizenship," where legal status is instrumentalized for power projection.

International Law and the Illegality of Extraterritorial Naturalization

In principle, states are free to regulate citizenship under domestic law. However, international law imposes limitations when the granting of nationality interferes with the sovereignty of another state. According to

the International Law Commission's 2008 'Draft Articles on Diplomatic Protection,' nationality must reflect a "genuine link" between the individual and the state (ILC 2008, Article 4). Russia's mass conferral of citizenship to residents of Abkhazia and the Tskhinvali region, without Georgia's consent and lacking meaningful links to the Russian state, violates this principle.

Kristopher Natoli's 2009 article insightfully critiques the timing and geopolitical manipulation of Russia's policy - *"The right of a successor state's minority population to choose their nationality necessarily implies the right of the predecessor state to confer its nationality on that population if requested to do so. If the predecessor state lacked that right, the minority group's right would be hollow. But a state's ability to exercise this right must be limited to a relatively narrow time frame surrounding the formation of the newly independent state. Otherwise, the internal stability of states could be threatened. Although Russia's involvement in South Ossetia has been consistent since the dissolution of the Soviet Union, its policy of conferring citizenship on the population of this area is more recent, beginning in earnest in 2002"* (Natoli 2009, 409).

The Abkhaz and Ossetian peoples who automatically received Georgian citizenship after the fall of the USSR, showed their interest in receiving Russian citizenship only eleven years later, in 2002. More recent legal scholarship – particularly by Anne Peters – identifies such extraterritorial policies as a form of "instrumentalization of nationality," which blurs the line between legal naturalization and indirect annexation (Peters 2023). Peters warns that practices like those seen in Georgia and Ukraine destabilize the international order by eroding the norm of non-intervention.

Similarly, Rainer Bauböck and Yossi Harpaz have discussed the emergence of "strategic citizenship" practices, where states use nationality to pursue extraterritorial influence. In these frameworks, Russia's passportization policy constitutes a form of citizenship inflation that undermines the territorial logic of international law (Bauböck 2019; Harpaz 2019). This paper builds upon these insights by showing how, in the Georgian case, passportization served to displace Georgian sovereignty silently, replacing it with de facto Russian jurisdiction through identity transformation and legal substitution.

Violation of Georgian Citizenship Law and the Principle of Sovereignty

Georgia's Organic Law on Citizenship (1993) granted citizenship to all residents of its territory, including those in Abkhazia and the Tskhinvali region, unless they formally renounced it. This legal framework was confirmed by the 2009 Independent International Fact-Finding Mission on the Conflict in Georgia (IIFFMCG). The mission determined that no such renunciations were documented, meaning that the residents of the breakaway regions remained Georgian citizens under both domestic and international law. The Russian policy ignored this legal reality and facilitated dual citizenship in contradiction to Georgian law, which, at the time, prohibited dual nationality. More importantly, Russia's actions represented an unlawful extraterritorial assertion of jurisdiction over Georgian citizens.

As stated in the report by the IIFFMCG, the Russian Law on Citizenship of the Russian Federation of November 28, 1991, stipulated that: *"The only group of persons not resident in the territory of the Russian Federation that could acquire Russian nationality by way of registration were stateless persons permanently resident on the territory of other republics within the former USSR. They had to register by 6 Feb 1993. That means that the residents of Abkhazia and South Ossetia who remained there on a permanent basis and did not resettle in the Russian Federation could acquire Russian nationality only if they were of Russian ascendancy or if they were stateless"* (Independent International Fact-Finding Mission on the Conflict in Georgia, Chapter 2: Conflicts in Abkhazia and South Ossetia: Peace Efforts 1991–2008, 2009, p. 164). Notably, the Russian version of the above-mentioned law is different. Article 18, paragraph 3, states that Russian citizenship could be acquired by: *"Citizens of the former USSR residing on the territories of the former states of USSR, also those people who moved to Russia after February 6, 1992, if they declare their will to acquire citizenship of the Russian Federation before December 31, 2000"* (Glava II: Priobreteniyе Grazhdanstva Rossiyskoy Federatsii, 2025).

To justify its actions, Russia, and some scholars (e.g., Toal 2008), have argued that many Abkhaz and Ossetians became "stateless" after the collapse of the USSR due to the difficulty of obtaining Georgian documents. However, it is important to acknowledge that Georgian citizenship mechanisms existed and applied to these populations from 1991 onward, as shown by Artman (2011) and Gugushvili (2012). The issue was not in law, but in the institutional capacity of the newly independent Georgian state, which

lacked the administrative machinery to implement and enforce its legislation, particularly in the separatist regions. This gap between legal entitlement and administrative execution formed the core of the legal grey zone, which Russia was uniquely positioned to exploit.

Misapplication of the Russian Citizenship Law and Temporal Manipulation

The 2002 Russian Citizenship Law (Federal Law No. 62-FZ), which came into force on July 1, 2002, allowed simplified naturalization for former Soviet citizens who were stateless. However, while evidence indicates that passportization in Abkhazia began before this law came into effect, roughly a month prior, raising doubts about its legal foundation, as Nagashima (2017) shows, the relevant Georgian legal framework on citizenship existed even prior to the Russian law on citizenship of November 1991, and this document restricted such extraterritorial grants and imposed strict deadlines, which had long passed by the year 2002. The Decree of the Supreme Council of the Georgian Republic on the Citizenship of the Georgian Republic, June 28, 1991, is a very important yet often neglected document that has to be taken into consideration in order to respond to and refute the emerging arguments attempting to legitimize Russia's "passportization policy" in Georgia. It clearly defined who automatically acquired Georgian citizenship, and applied to those who, on the effective date of this law coming into force, had been permanent residents of Georgia, had a permanent job or other legal sources of income on the territory of Georgia, or owned property within Georgian territory and expressed their will for Georgian citizenship by way of a declaration of loyalty. The decree also detailed naturalization eligibility criteria, such as a ten-year residency in Georgia, Georgian language competence, the ability to speak the local language in autonomous republics, and a guarantee of means of subsistence, employment, or property in ownership (*The Decree of the Supreme Council of Georgian Republic on the Citizenship of the Georgian Republic* 1991). As expressed by scholar Alexi Gugushvili, the mentioned law had been adopted by Georgia's first post-Soviet, democratically elected legislative body (Gugushvili, 2012, p. 3). As clarified by the original legislative text and supported by legal analyst Kentaro Nagashima (2017), the passportization policy was initiated while the 1991 decree of the Supreme Council of the Georgian republic was still in effect. That law had strict limitations: it permitted the extraterritorial acquisition of Russian nationality only by stateless persons residing outside the Russian Federation who applied by the set deadlines – February 6, 1993, and December 31, 2000. Generally, the period of the 1990s in Georgia was marked by profound institutional incapacity. This fragility stemmed largely from the violent political upheaval that followed the collapse of the Soviet Union, including the military coup of 1991–1992 and the ensuing civil war, which devastated Georgia's state infrastructure. These events not only destabilized the central government, but also severely undermined the capacity of newly established state institutions to implement legislation, deliver public services, or assert control over the entirety of Georgian territory – including the breakaway regions of Abkhazia and Tskhinvali. While Georgia took early legal steps to assert its sovereign jurisdiction over all territories within its internationally recognized borders – including Abkhazia and the Tskhinvali region – these measures were severely undermined by the lack of effective state institutions capable of enforcing such laws. This disconnect between legislative ambition and administrative implementation gave rise to a persistent "legal grey area," which Russia opportunistically exploited to advance its own political agenda in the region.

Thus, the aforementioned decree of June of 1991, while symbolically significant, lacked the institutional machinery necessary for effective implementation. In practice, the state's inability to administer these citizenship rights – particularly in conflict-affected and separatist regions – rendered the law more declarative than operational. The resulting vacuum created conditions ripe for external manipulation. Russia capitalized on this institutional void to frame the Abkhaz and Ossetian populations as victims of Georgian neglect, thereby legitimizing its own passportization policy under the guise of humanitarian intervention. This disjuncture between legal frameworks and on-the-ground realities underscores a fundamental weakness in early post-Soviet Georgian statehood. While Georgia maintained formal sovereignty, it lacked practical reach to the breakaway regions, leaving its citizens vulnerable to legal absorption by a more institutionally capable neighboring state. This phenomenon – where another state takes advantage of legal ambiguity to assert quasi-sovereignty over a population – is central to what this

paper terms “legal grey zone exploitation.” By providing Russian passports to these residents, Russia displaced Georgia’s legal and symbolic claim over its citizens. These individuals continued to reside within Georgia’s internationally recognized borders, but their allegiance, documentation, and rights were redefined by a foreign power. This is silent displacement in practice: no border changes, no population movement – yet a complete transformation of state-citizen relations. Moreover, Russia’s actions contravened its obligations under the 1997 European Convention on Nationality, particularly those prohibiting arbitrary naturalization and interference with another state’s domestic affairs. The selective use of legal texts, strategic timing, and humanitarian justifications reflect a pattern of legal opportunism. Citizenship became the means through which Moscow penetrated Georgian sovereignty, not by force, but by substituting the legal framework that defined the identity and belonging of its citizens.

Identity Reconfiguration through Citizenship: A Dual Strategy

Russia’s passportization policy in Abkhazia and the Tskhinvali region is not only a legal strategy, but also a calculated project of social engineering. It combines two parallel and mutually reinforcing mechanisms: economic dependency and identity transformation, both central to understanding the long-term geopolitical consequences of the policy. Drawing on Dependency Theory, the Kremlin positioned itself as the primary provider of welfare and opportunity. By offering pensions significantly higher than those of the local *de facto* authorities, and by awarding student scholarships for study in Russian universities, Russia cultivated a material reliance that translated into political loyalty. Economic aid, social services, and access to benefits became conditional on accepting Russian citizenship, thereby embedding dependency within the framework of naturalization. This is the visible theory in the deliberate creation of financial disparities by Russia in offering pensions amounting to 1,600 rubles to its passport holders in Abkhazia against 100 rubles provided by the *de facto* authorities (Kirova, 2012, p. 17). In the process, by positioning itself as the primary source of economic support, Moscow undermined local governance structures and made the separatist regions economically dependent on Russian aid, hence limiting their capacity for autonomous decision-making. At the same time, constructivism relies on social constructs, norms, and identity formation as the foundational base of international relations (Wendt 1992). Through linguistic policies, education, and institutional Russification, Russia gradually displaced local or Georgian-aligned identities with those aligned to the Russian state. The adoption of Russian as an official language, the dominance of Russian in administrative and educational contexts, and the symbolic promotion of Russian narratives, all contributed to embedding Abkhazia and the Tskhinvali region within Moscow’s cultural orbit.

The linguistic policies in both regions further demonstrate the interaction of dependency and constructivism. In the so-called South Ossetia, the referendum in 2011 that gave Russian the status of state language along with Ossetian reflects the profound cultural integration stimulated by Moscow (Kirova, 2012, p. 21). Similarly, while Abkhaz presidential candidates are required to pass an Abkhaz language test, the *de facto* lingua franca in education and administration is Russian. This aspect reveals the gradual erosion of local identity in favor of Russian linguistic and cultural dominance. According to constructivist scholars, such policies do not only reshape the identity of the governed, but also redefine their social and political alignment, embedding them within the sphere of influence of the dominant power (Risse 2000). Together, Dependency Theory and Constructivism can reveal the duality of Russia’s strategies: creating economic dependency in tandem with the reconstruction of cultural and political identity. In this regard, the multipronged approach is bound to keep the Abkhazia and Tskhinvali region within Moscow’s geopolitical orbit, not by coercion alone, but within a carefully constructed framework of economic dependency and identity alignment. The intersection of these strategies created a condition of silent displacement. Residents of Abkhazia and the Tskhinvali region were not physically relocated, but their legal identity as Georgian citizens was overwritten, and their cultural allegiance reoriented. In effect, Russia exercised control not through overt occupation, but by gradually remapping the identity and legal status of populations in the contested areas.

CONCLUSION

The Russian "passportization policy" in Abkhazia and the Tskhinvali region represents a profoundly disruptive tool of hybrid warfare. By exploiting legal ambiguity and institutional fragility, Russia systematically undermined Georgia's post-Soviet state-building process, replacing national jurisdiction with foreign allegiance without direct military confrontation. Legally, the policy violates principles of sovereignty, non-intervention, and the requirement of a genuine link in naturalization. It also disregards Russia's own legal frameworks through selective interpretation and strategic timing. The policy's implications, however, extend far beyond legal irregularities. By embedding economic dependency and reconstructing identity through cultural policies, Moscow implemented a long-term strategy of control that bypasses the traditional mechanisms of occupation or annexation.

This paper introduced the concepts of legal grey zone exploitation and silent displacement through legal absorption to capture the unique mechanisms at play in the Georgian case. These concepts help to explain how citizenship, identity, and sovereignty can be reshaped without warfare, using the legal architecture of statehood itself as a weapon. Russia's passportization campaign in Georgia is not just a national challenge – it is a precedent-setting act with global implications. It lowers the threshold for external interference under the guise of legal order, posing a systemic threat to international law and regional security. While this analysis focuses specifically on Georgia, the conceptual frameworks developed here – particularly legal grey zone exploitation and silent displacement through legal absorption – may hold broader relevance. Future research might explore how these dynamics operate in other contested territories where legal ambiguity intersects with geopolitical ambition. In this sense, Georgia offers not only a case study, but a paradigm for understanding the legal mechanisms of hybrid territorial influence.

Addressing such policies requires not only legal and diplomatic responses, but also a renewed focus on rebuilding state capacity, reaffirming sovereign citizenship, and developing international norms to regulate extraterritorial naturalization in contested regions.

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