

## Azerbaijan and Accountability for Crimes Against Armenians

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### 1. Historical Background and Roots of the Conflict

The Armenia–Azerbaijan conflict represents one of the most enduring and tragic disputes to emerge from the dissolution of the Soviet Union, with roots stretching back over a century. Following the collapse of the Russian Empire, both Christian Armenia and Muslim Azerbaijan declared independence in 1918, with Azerbaijan claiming extensive territories including areas with significant Armenian populations.<sup>1</sup> The Muslims of Transcaucasia, referred to as ‘Tatars’ by the Russians, adopted the name ‘Azerbaijan’ for political reasons and lacked a standing army. The newly formed Azerbaijani state allied with the advancing Turkish army, which had recently perpetrated the Armenian Genocide, to secure control over disputed territories.

When Soviet power advanced into the Caucasus, Nagorno-Karabakh Armenians surrendered to the Bolsheviks in 1920, believing promises made that the region would remain with Armenia. However, Stalin’s divide-and-rule policies dashed these hopes. In July 1921, the Kavburo, the Bolsheviks’ Committee on the Caucasus, initially voted to attach Nagorno-Karabakh to Soviet Armenia, but Stalin reversed this decision the next day, placing the ethnically Armenian region under Azerbaijani control – possibly at Mustafa Kemal Atatürk’s request to keep Armenia weak.<sup>2</sup> This decision was driven largely by Azerbaijan’s strategic importance due to its oil resources and Moscow’s hope that the Muslim republic would inspire regional revolution.<sup>3</sup>

When Gorbachev’s *glasnost* policies allowed open political expression, suppressed ethnic grievances exploded. The first major atrocity was the February 1988 Sumgait pogrom, involving “horrific savagery” against Armenians including murder, rape and mutilation while Azerbaijani police turned a blind eye.<sup>4</sup> This pogrom forced approximately 14,000 Armenians to flee their homes. No investigation was conducted, establishing a pattern where those who committed crimes against Armenians would face no consequences. This violence escalated through ‘Operation Ring’ in 1991 and pogroms in Baku that ultimately forced virtually the entire Armenian population of Azerbaijan to flee.<sup>5</sup>

As the Soviet Union collapsed in 1991, both republics declared independence while remaining locked in fundamental disagreement over Nagorno-Karabakh. The region’s population voted 99.89 per cent for independence in December 1991, leading to the formation of a local defence force comprised mainly of Nagorno-Karabakh Armenians fighting to protect their ancestral homeland from systematic persecution.

By 1992, full-scale warfare had begun, Azerbaijani forces used Soviet GRAD rocket launchers to deliberately target civilian areas, destroying schools and hospitals while forcing 50,000 people into basement shelters.

A devastating siege of Nagorno-Karabakh’s capital killed approximately 2,000 civilians.<sup>6</sup>

In 1994, a Russian-mediated ceasefire ended the first war, leaving Armenians controlling Nagorno-Karabakh and seven surrounding Azerbaijani districts, including Lachin, which served as a vital corridor to Armenia.<sup>7</sup> Armenian Nagorno-Karabakh forces considered this necessary to stop the shelling and starvation, and to provide humanitarian relief.<sup>8</sup>

Following the ceasefire, the Organization for Security and Co-operation in Europe (‘OSCE’) Minsk Group, became the main mediation platform for over 25 years on the status of Nagorno-Karabakh.<sup>9</sup> Despite numerous proposals, Azerbaijan rejected every solution, steadily arming itself for a military resolution.<sup>10</sup>

Border clashes persisted, and in April 2016, after rejecting a proposed settlement, President Ilham Aliyev launched an attack, openly declaring his intent to retake the territory by force. Another Russian-brokered ceasefire temporarily halted hostilities.

In September 2020, Azerbaijan launched a full-scale war, ignoring international ceasefire efforts and announcing that it would advance until complete victory. Azerbaijan’s extensive use of Turkish Bayraktar TB2 drones and Israeli Harop loitering munitions provided decisive advantages against obsolete Soviet-era air defences.<sup>11</sup> Azerbaijan also deployed Syrian mercenaries to the frontlines, further escalating the conflict.<sup>12</sup> The war ended after 44 days with another Russian-brokered ceasefire that deployed Russian peacekeepers along the Lachin Corridor for a mandated five-year term.

Since 2020, clashes continued intermittently, with Azerbaijan conducting incursions into Armenian territory. The critical development came on 12 December 2022, when Azerbaijan established a blockade of the Lachin Corridor, the only road connecting Nagorno-Karabakh to Armenia and the outside world.

For nine months, an estimated 120,000 people were deprived of outside goods, including food, medicine, electricity, heating, water and fuel supplies. This blockade culminated in September 2023 with a full-scale assault that forced the entire Armenian population of Nagorno-Karabakh to flee.

<sup>6</sup> *Ibid.*, pp. 47–48.

<sup>7</sup> Tatul Hakobyan, *The Valley of Death*, Lusakn Publishing House, Yerevan, 2021, p. 302.

<sup>8</sup> Robertson, 2021, p. 51, see *supra* note 2.

<sup>9</sup> Walter Landgraf and Nareg Seferian, “A ‘Frozen Conflict’ Boils Over: Nagorno-Karabakh in 2023 and Future Implications”, Foreign Policy Research Institute, Eurasia Program, 2024, p. 12.

<sup>10</sup> Hakobyan, 2021, pp. 300–306, see *supra* note 7.

<sup>11</sup> Joël Postma, “Drones over Nagorno-Karabakh: A Glimpse at the Future of War?”, in *Atlantisch Perspectief*, 2021, vol. 45, no. 2, pp. 15–20.

<sup>12</sup> Lemkin Institute for Genocide Prevention, “Risk Factors and Indicators of the Crime of Genocide in the Republic of Artsakh: Applying the UN Framework of Analysis for Atrocity Crimes to the Nagorno-Karabakh Conflict”, 5 September 2023, pp. 81–82 (<https://legal-tools.org/doc/71cb3gwt/>).

<sup>1</sup> “World War I and Its Consequences”, in Glenn E. Curtis (ed.), *Armenia: A Country Study*, Library of Congress, Washington, D.C., 1995.

<sup>2</sup> Geoffrey Robertson, “Nagorno-Karabakh’s Right to Self-Determination”, in *Genocide Studies International*, 2021, vol. 15, no. 1, p. 45.

<sup>3</sup> Thomas de Waal, *Black Garden: Armenia and Azerbaijan through Peace and War*, New York University Press, 2013, p. 144.

<sup>4</sup> Robertson, 2021, pp. 45–46, see *supra* note 2.

<sup>5</sup> *Ibid.*

## 2. Documented Atrocities and Human Rights Violations

Survivor testimony and human rights investigations have also documented widespread torture and inhuman treatment. Armenian prisoners of war and civilian detainees have described severe physical beatings, electric shocks, deprivation of food and medical care, and psychological abuse. These acts, coupled with sexual violence, including rape and other forms of assault, were often accompanied by ethnic slurs and dehumanizing rhetoric, pointing to a deliberate targeting of victims on the basis of their Armenian identity.

Another dimension of the crimes has been the use of deprivation and blockade as tools of persecution. In recent years, blockades cutting off food, medicine and essential supplies to Armenian-populated areas have led to starvation conditions and deteriorating health outcomes, disproportionately affecting vulnerable groups such as the elderly and children.

## 3. State-Sponsored Hatred and Racial Discrimination

The systematic promotion of anti-Armenian hatred documented by international monitoring organizations provides crucial context for understanding why accountability mechanisms fail in Azerbaijan. A 2016 report submitted to the United Nations (‘UN’) Committee on the Elimination of Racial Discrimination (‘CERD’) found that anti-Armenian sentiment is embedded at the highest levels of state policy, creating an environment where violence against Armenians is celebrated rather than prosecuted.

The report documents how President Ilham Aliyev himself has identified “global Armeniandom” as Azerbaijan’s “main enemy”.<sup>13</sup> First Vice-Speaker Ziyafat Asgarov stated that the ‘Armenian’ disease is hard to cure and the “longer it remains without cure, the harsher its consequences are”.<sup>14</sup> When the highest levels of government openly promote such dehumanizing rhetoric, it creates a climate where violence against Armenians becomes not only acceptable but patriotic.

This state-sponsored hatred extends into Azerbaijan’s educational system, where official textbooks systematically demonize Armenians. Analysis of Ministry of Education-approved materials reveals that Armenians are described using terms like “Armenian terrorist”, “Armenian bandit”, and “Armenian enemy” throughout history courses. In textbooks designed for tenth and eleventh grade students, 33 discriminatory and derogatory terms are used to describe Armenians, with children being taught to view them as inherent enemies rather than fellow human beings.<sup>15</sup>

Azerbaijan actively suppresses any voices that challenge this anti-Armenian narrative, demonstrating how accountability advocates are systematically silenced. Azerbaijani writer Akram Aylisli, who portrayed Armenians in a positive light and depicted historical pogroms honestly, was stripped of his ‘People’s Writer’ title and pension by presidential decree. His books were publicly burned and society called for cutting off his ears. This persecution sends a clear message that questioning anti-Armenian hatred carries severe consequences.<sup>16</sup>

Media outlets serve as tools for disseminating this hatred, with articles comparing Armenians to infectious diseases. One typical example states: “The Armenian dom is like a variety of flu [...] This contagion had turned into an epidemic which must be fiercely fought off [...] killing this virus is possible only by understanding its nature, becoming immune to it and destroying it without mercy”. Such dehumanizing language creates an ideological framework where violence against Armenians appears justified rather than criminal.<sup>17</sup>

## 4. Crimes During the War and the Blockade

During the Second Nagorno-Karabakh War and the September 2022 attacks, Azerbaijani forces engaged in widespread atrocities including the extrajudicial execution of prisoners of war (documented on video), torture of captives through beatings, electric shock devices, forced standing for

days, and withholding food and water.<sup>18</sup>

The regime deliberately targeted civilians, bombing schools and healthcare centres, while using prohibited weapons including cluster munitions in populated areas and white phosphorus that caused severe burns to 87 Armenian soldiers, nine of whom died from their injuries.<sup>19</sup>

Rather than prosecuting these crimes, the Aliyev regime has celebrated and rewarded perpetrators, creating a culture of impunity that encourages further atrocities. President Aliyev personally awarded medals to soldiers who committed documented war crimes, including Gardashkhan Abishov, who participated in the sexual mutilation of a female Armenian soldier’s corpse, and an officer who decapitated 19-year-old Kyaram Sloyan and posted photos with the severed head on social media. The regime established a ‘Military Trophy Park’ in Baku displaying captured Armenian military equipment, helmets of dead soldiers, and wax figures of Armenian soldiers designed with deliberately exaggerated and stereotypical features to mock and dehumanize them. This systematic celebration of atrocities has created what the European Court of Human Rights (‘ECHR’) termed “virtual impunity” for crimes against Armenians.<sup>20</sup>

The nine-month complete blockade of the Lachin Corridor, the sole road connecting Artsakh to Armenia and the outside world, systematically cut off 120,000 Armenians from essential supplies. Azerbaijan deliberately sealed off the territory from access to food, medications, infant formula, and other necessities and then compounded this crisis by cutting electricity and natural gas supplies, and disrupting telecommunications.<sup>21</sup> The first death from starvation happened eight months into the blockade.<sup>22</sup>

## 5. Destruction of Cultural Heritage

Following the forced displacement ethnic Armenians from Nagorno-Karabakh in September 2023, Azerbaijan has accelerated a systematic campaign to erase centuries of Armenian cultural and religious heritage from the region. This destruction extends far beyond wartime damage to encompass deliberate targeting of churches, monasteries, cemeteries, and entire villages with deep historical significance. Notable examples include the complete demolition of the nineteenth-century St. Hovhannes Mkrtich Church (Kanach Zham) and the St. Hambardzum Church of Berdzor, both reduced to rubble by 2024. The historic Ghazanchetsots Cathedral, a masterpiece of nineteenth-century Armenian architecture, has undergone unauthorized ‘restoration’ that fundamentally altered its Armenian character. Satellite imagery confirms the complete destruction of historic cemeteries, including the Ghazanchetsots cemetery containing eighteenth- and nineteenth-century Armenian gravestones.

Beyond physical destruction, Azerbaijan has engaged in systematic appropriation of Armenian heritage sites through false historical claims and forced conversions. Ancient monasteries like Gandzasar and Dadivank, containing hundreds of Armenian inscriptions dating back centuries, are being rebranded as “Caucasian Albanian” sites despite overwhelming archaeological and historical evidence of their Armenian origins.<sup>23</sup> This erasure campaign has been institutionalized at the highest levels of government, with President Aliyev and Azerbaijan’s Ministry of Culture ordering the removal of medieval Armenian inscriptions from churches and explicitly promising to erase what they termed “fictitious [Armenian] traces”.<sup>24</sup> Such policies institutionalize the view that Armenians are unwelcome enemies rather than individuals deserving equal treatment.

This comprehensive system of state-sponsored hatred explains why accountability for crimes against Armenians is structurally impossible in Azerbaijan. When official ideology consistently portrays Armenians as enemies deserving of violence, when children are educated to hate them,

<sup>18</sup> Human Rights Watch, “Azerbaijan: Armenian POWs Abused in Custody”, 19 March 2021 (<https://legal-tools.org/doc/if8oltqm/>).

<sup>19</sup> Human Rights Watch, “Azerbaijan: Cluster Munitions Used in Nagorno-Karabakh – Stop Use of Banned Weapons; Secure and Destroy Stocks”, 23 October 2020 (<https://legal-tools.org/doc/4qf1lhyo/>). Lemkin Institute for Genocide Prevention, 2023, pp. 116–117, see *supra* note 12.

<sup>20</sup> *Ibid.*, pp. 36–37.

<sup>21</sup> *Ibid.*, pp. 75–77.

<sup>22</sup> Ani Avetisyan, “First death from starvation reported in blockade-struck Nagorno-Karabakh”, *OC Media*, 15 August 2023.

<sup>23</sup> Center for Truth and Justice, “The Deliberate and Systematic Erasure of Armenian Cultural and Religious Sites by Azerbaijan in 2024”, 1 February 2025, p. 24 (<https://legal-tools.org/doc/15wnyud3/>).

<sup>24</sup> Lemkin Institute for Genocide Prevention, 2023, pp. 100–101, see *supra* note 12.

when media dehumanizes them, and when cultural monuments are destroyed, individual acts of violence become heroic rather than criminal.

The international community has repeatedly condemned this hate campaign, but Azerbaijan continues these policies with impunity. This demonstrates that accountability failures are not bureaucratic oversights, but deliberate choices to maintain an ideological system where violence against Armenians is celebrated as patriotic duty. Until this systematic promotion of hatred is addressed, genuine accountability for crimes against Armenians remains unlikely within Azerbaijan's current political and social framework.

## 6. Accountability Denied

### 6.1. ECHR Case Law

Rather than prosecuting or condemning individuals implicated in killings or abuses, Azerbaijan has often celebrated them as national heroes. This has contributed to a culture of impunity, where violence against Armenians is not only tolerated, but valorized. Three ECHR cases, *Narayan*, *Makuchyan and Minasyan*, and *Khojayan and Vardazaryan*, vividly illustrate this pattern, showing how official responses have shifted from glorification to denial, but never towards genuine accountability.

The *Makuchyan and Minasyan v. Azerbaijan and Hungary* case provides a stark illustration of how Azerbaijan has not only failed to hold perpetrators accountable for crimes against Armenians, but has actively celebrated them as heroes. In 2004, Azerbaijani soldier Ramil Safarov murdered Armenian Lieutenant Guren Markarian by decapitating him with an axe while he slept during a North Atlantic Treaty Organization ('NATO') training course in Budapest. Safarov was convicted by Hungarian courts of premeditated murder motivated by ethnic hatred and sentenced to life imprisonment. When transferred to Azerbaijan in 2012 under a prisoner transfer convention, Aliyev immediately pardoned Safarov and orchestrated a hero's welcome that revealed the state's complete endorsement of his actions. Safarov was promoted to major, given eight years of back pay, and gifted a state apartment. The state's highest officials publicly praised his actions as patriotic.<sup>25</sup> The presidential web site even created a dedicated section where citizens could congratulate Safarov on his release and pardon.

This official celebration of Safarov's crime drew sharp international condemnation. Russia, which had been mediating the Armenia–Azerbaijan conflict, stated that Azerbaijan's actions "contradict internationally brokered efforts" to ease regional tensions. The co-chairs of the OSCE Minsk Group expressed "deep concern and regret for the damage the pardon and any attempts to glorify the crime have done to the peace process". The European Union called for calm, while the European Parliament later condemned the pardon as running contrary to the spirit of international agreements and violating principles of good faith.

The ECHR found that Azerbaijan's handling of Safarov's case granted him impunity and was directly tied to the ethnic identity of his victim, reinforcing the message that violence against Armenians is to be rewarded, not punished.<sup>26</sup>

The *Narayan* case demonstrates that this glorification was not an isolated event. In 2016, Azerbaijani soldier Çingiz Gurbanov killed two unarmed Armenian soldiers during a cross-border attack. Rather than investigating or prosecuting these actions, Azerbaijan posthumously awarded Gurbanov the title of 'National Hero of Azerbaijan'. President Aliyev, in his official statements, praised him for fighting "to the last breath" and "killing several invaders", despite the ECHR's finding that the Armenian soldiers were unarmed and posed no threat. Aliyev framed the unlawful killings as heroic acts of patriotism, stating "All Azerbaijan is proud of Chingiz" and promising that his name would be "immortalized".

Rather than accountability, there was state-sponsored honour for actions that an international court found to be unlawful killings. This pattern exemplifies how perpetrators of crimes against Armenians in Azerbaijan face no consequences and may even receive state honours.<sup>27</sup> The state's ceremonial honouring of Gurbanov and public glorification of his actions

sent a powerful message: violence against Armenians could be celebrated as patriotic duty rather than punished as a crime.

The *Khojayan and Vardazaryan v. Azerbaijan* case involves the capture and torture of a 77-year-old Armenian farmer that illustrates Azerbaijan's systematic failure to investigate crimes against Armenians. In 2014, 77-year-old Armenian farmer Mamikon Khojayan was captured after accidentally crossing the border. Initially appearing unharmed, he was later shown with severe injuries while still in Azerbaijani custody. Upon his release, five weeks later mediated by the Red Cross, Khojayan was in critical condition with multiple head injuries, fractures, bullet wounds, and signs of torture, and died two months later. Despite this evidence, Azerbaijan refused to open an investigation and claimed Khojayan had been treated properly. The ECHR concluded that Azerbaijan's failure to investigate violated its procedural obligations and perpetuated impunity. The complete absence of any Azerbaijani investigation into Khojayan's treatment represents another clear example of impunity for crimes against Armenians.<sup>28</sup>

The Azerbaijani government's defence revealed the same pattern of denial and deflection seen in other cases. This reflexive denial of obvious wrongdoing demonstrates how accountability mechanisms have been entirely subverted when Armenians are the victims.

The cases also reflect the broader climate that enables such treatment to occur without consequences. By 2014, Azerbaijan had already celebrated Safarov as a national hero for murdering an Armenian soldier, sending a clear message that violence against Armenians would be rewarded rather than punished. In this environment, the torture of an elderly Armenian farmer becomes normalized rather than criminal, requiring no investigation or accountability from authorities who have internalized the message that Armenians are legitimate targets for abuse.

### 6.2. Performative Military Justice

While the cases above demonstrate how perpetrators are typically celebrated or shielded, there have been rare instances where Azerbaijan has prosecuted its own soldiers for abuses. These moments, however, may reveal the limits of accountability rather than a systemic change.

Following the 2020 Nagorno-Karabakh war, disturbing videos emerged showing Azerbaijani soldiers desecrating Armenian corpses and destroying Armenian gravestones. In December 2020, Azerbaijan's Prosecutor General's Office announced the arrest of four servicemen – Rashad Aliyev, Gardashkhan Abishov, Arzu Huseynov and Umid Aghayev – for these acts under charges of torture, cruel treatment and insulting acts on graves or corpses.

The prosecution statement acknowledged that these "criminal acts committed by the servicemen of the Republic of Azerbaijan are unacceptable and contradict the mentality of the Azerbaijani people" and promised that "persons who have committed similar violations will be brought to liability".<sup>29</sup> This marked a notable departure from the celebratory responses seen in the Safarov and Gurbanov cases, suggesting some awareness that such conduct damages Azerbaijan's international standing.

The statement's defensive tone reveals its limitations. Rather than focusing solely on accountability for its own forces, Azerbaijan extensively criticized Armenia for alleged inaction regarding crimes against Azerbaijanis, deflecting attention from its own responsibilities. The prosecution framed these incidents as isolated "mistakes" caused by the "severe psychological state" of war, rather than examining how years of state-sponsored anti-Armenian rhetoric and the glorification of figures like Safarov created conditions for such acts.

### 6.3. Structural Barriers to Justice

The Azerbaijani Prosecutor General's Office maintains extensive anti-Armenian propaganda on its official web site, revealing how deeply ethnic hatred has penetrated the very institutions responsible for ensuring accountability. The site hosts a lengthy document titled "The Armenian Question and Armenian Terror" that presents a comprehensive narrative casting Armenians as inherently treacherous and violent, describing their political movements as fundamentally "aggressive and predatory" arising from "the kernel of Armenian history".<sup>30</sup>

<sup>25</sup> "Azeri killer Ramil Safarov: Concern over Armenian anger", *BBC*, 3 September 2012.

<sup>26</sup> ECHR, *Makuchyan and Minasyan v. Azerbaijan and Hungary*, Fourth Section, Judgement, Application no. 17247/13, 12 October 2020 (<https://legal-tools.org/doc/whwke5wu/>).

<sup>27</sup> ECHR, *Narayan and Others v. Azerbaijan*, Fifth Section, Judgement, Applications nos. 54363/17, 54364/17 and 54365/17, 24 June 2024 (<https://legal-tools.org/doc/g0v2srva/>).

<sup>28</sup> ECHR, *Khojayan and Vardazaryan v. Azerbaijan*, Fifth Section, Judgement, Application no. 62161/14, 28 February 2022 (<https://legal-tools.org/doc/vnb7o-9jg/>).

<sup>29</sup> Azerbaijan, Prosecutor General's Office, "Detained Four Servicemen Accused of Insulting Bodies of Armenian Servicemen and Tombstones Belonging to Armenians", 14 December 2020 (<https://legal-tools.org/doc/lswbf8z/>).

<sup>30</sup> Azerbaijan, Prosecutor General's Office, "The Armenian Question and Arme-



This official language is deeply troubling for several reasons. First, it demonstrates the institutionalization of anti-Armenian sentiment within Azerbaijan's justice system itself. The Prosecutor General's Office, the institution responsible for prosecuting hate crimes and ensuring equal justice, simultaneously hosts content that dehumanizes an entire ethnic group. The document characterizes Armenian political movements as terrorist organizations and includes a section titled "The World About Armenians" featuring derogatory quotes portraying Armenians as cunning, mean and untrustworthy people who "have excited bad thoughts since ancient time".<sup>31</sup>

The presence of such propaganda on a law enforcement web site creates a fundamental contradiction in Azerbaijan's accountability framework. While the same Prosecutor's Office arrested four soldiers for desecrating Armenian corpses in 2020, it simultaneously promotes the ideological foundations that enable such violence. This schizophrenic approach reveals why accountability efforts remain superficial – the institution prosecuting specific acts continues to foster the ethnic hatred that motivates those acts.

The document's official status provides crucial context for understanding how perpetrators of anti-Armenian violence like Safarov and Gurbanov become celebrated as heroes. When state institutions officially characterize Armenians as historical enemies and existential threats, individual acts of violence against them can be reframed as patriotic defence rather than criminal behaviour. The hate speech creates a narrative framework where killing Armenians appears justified and heroic rather than criminal.

The selective nature of the document further undermines accountability by presenting Azerbaijan exclusively as a victim while extensively cataloguing alleged Armenian crimes. This victim-perpetrator reversal allows the state to justify retaliatory violence and present anti-Armenian attacks as defensive measures. When the institutions responsible for justice actively promote such narratives, genuine accountability for ethnic violence becomes structurally impossible.

This official promotion of ethnic hatred demonstrates that Azerbaijan's accountability problem extends far beyond individual cases or military discipline failures. It reflects systematic state policy that makes substantive accountability very unlikely as it reinforces the very ideological foundations that enable anti-Armenian violence. The 2020 prosecutions thus appear as performative damage control rather than genuine reform – addressing visible symptoms while the state apparatus continues nurturing the underlying disease of ethnic hatred through its official channels.

## 7. Recommendations

On 8 August 2025, Armenian Prime Minister Nikol Pashinyan and Azerbaijani President Ilham Aliyev, with United States President Donald Trump's mediation, signed a peace agreement aiming to end the conflict permanently. The deal includes creating a 43-kilometre transit corridor through southern Armenia, dubbed the Trump Route for International Peace and Prosperity ('TRIPP'), connecting mainland Azerbaijan to its Nakhchivan exclave.<sup>32</sup>

While the August 2025 peace agreement and creation of TRIPP offer hope for a more stable future, peace without justice risks entrenching impunity and leaving root causes of conflict unresolved. The very fact that Armenia was pressured to withdraw its cases at the International Court of Justice ('ICJ') under threat of renewed Azerbaijani military action highlights the structural imbalance that continues to favour coercion over the rule of law. True reconciliation cannot be built on fear, nor can lasting peace endure when past atrocities remain unpunished.

The Azerbaijani Prosecutor General's Office – the very institution tasked with ensuring justice – continues to publish rhetoric depicting Ar-

menians as 'aggressors' and 'terrorists'. This state-sanctioned dehumanization is powerful evidence that neutral domestic accountability remains implausible, and that systemic reform is needed before domestic courts could be trusted to deliver justice.

The international community must ensure that Azerbaijan's crimes against Armenians are documented and adjudicated despite the withdrawal of ICJ cases. Independent UN fact-finding missions and OSCE investigative mechanisms should be mandated to collect evidence for potential future proceedings before the ICJ, the ECHR, or even the International Criminal Court following the principle of complementarity. Countries with universal jurisdiction statutes should be encouraged to open investigations targeting specific Azerbaijani officials responsible for war crimes, torture and cultural destruction.

Targeted sanctions remain one of the few tools capable of altering Baku's cost-benefit calculus. Magnitsky-style sanctions should be applied to military commanders, prosecutors and cultural officials directly implicated in atrocities and heritage destruction.

Furthermore, the deliberate targeting of Armenian cultural heritage represents not merely property destruction, but an assault on the religious freedom and cultural identity of the displaced Armenian population. Despite explicit ICJ orders to prevent acts of vandalism against Armenian cultural sites, Azerbaijan has continued these violations with impunity, demonstrating the urgent need for robust international accountability mechanisms. The international community must implement targeted sanctions against Azerbaijani officials responsible for cultural destruction, establish independent monitoring of remaining heritage sites, and pursue criminal liability through appropriate international judicial bodies. Without immediate intervention, Azerbaijan's systematic erasure campaign threatens to permanently obliterate centuries of Armenian cultural presence in the region, setting a dangerous precedent for cultural genocide that undermines the foundational principles of international heritage protection.

The Azerbaijani government's suppression of voices challenging anti-Armenian propaganda perpetuates a cycle of dehumanization. The international community must support Azerbaijani intellectuals, journalists, and human rights defenders who speak out, providing them with platforms and protections. Counter-disinformation campaigns are necessary to challenge state-sanctioned hate speech that lays the groundwork for future atrocities.

Without robust accountability mechanisms, the crimes committed against Armenians will remain unpunished, the victims unheard, and the perpetrators emboldened. The international community should move beyond statements of concern to enforceable measures to ensure that the cycle of impunity is broken.

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nian Terror", 31 December 2021 (<https://legal-tools.org/doc/zrdr4d1n/>).

<sup>31</sup> *Ibid.*

<sup>32</sup> United States, The White House, "President Trump Brokers Another Historic Peace Deal", 8 August 2025 (<https://legal-tools.org/doc/yborifk4/>).



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