EUROPEAN COURT OF HUMAN RIGHTS
COUR EUROPÉENNE DES DROITS DE L'HOMME

THIRD SECTION

DECISION

Application no. 55277/20
Konstantin Anatolyevich BOGDANOV
against Russia

The European Court of Human Rights (Third Section), sitting on 25 September 2025 as a Committee composed of:

Diana Kovatcheva*, President*,
Canòlic Mingorance Cairat,
Vasilka Sancin*, judges*,

and Viktoriya Maradudina, *Acting Deputy Section Registrar,*

Having regard to the above application lodged on 27 November 2020,

Having regard to the observations submitted by the respondent Government,

Having deliberated, decides as follows:

FACTS AND PROCEDURE

The applicant's details are set out in the appended table.

The applicant was represented by Mr A.N. Laptev, a lawyer practising in Moscow.

The applicant's complaints under Article 6 § 1 of the Convention concerning the lack of impartiality of the tribunal in view of the absence of the prosecuting party in administrative-offence proceedings were communicated to the Russian Government ("the Government").

THE LAW

The Court notes from the outset that the application was introduced on 27 November 2020, more than six months after 27 February 2020, the date on which the final domestic decision, within the meaning of Article 35 § 1 of the Convention, was adopted in the administrative-offence proceedings complained of by applicant. It must therefore be ascertained whether the applicant has complied with the six-month rule set out in Article 35 § 1 of the Convention, as worded before the entry into force of Protocol No. 15.

The Court further notes that, as regards applications introduced in 2020, the method of calculation of the six-month period has been adjusted to handle the difficulties to which the global pandemic and widespread lockdown gave rise and to preserve the essence of the right of the individual petition under Article 34 of the Convention. In particular, the six-month rule was exceptionally considered to have been suspended for the three calendar months in total, whenever a calendar six-month period either started to run or, on the contrary, was due to expire at any time between 16 March and 15 June 2020 (see *Saakashvili v. Georgia* (dec.), nos. 6232/20 and 22394/20, §§ 46-59, 1 March 2022).

Turning to the circumstances of the present case, the Court observes that neither the date of the introduction of the application, nor the date of the expiration of the six-month time-limit fall within the period between 16 March and 15 June 2020. The exceptional measure is therefore not applicable in the present case (compare *Kitanovska and Barbulovski v. North Macedonia*, no. 53030/19, §§ 39-40, 9 May 2023 and *Masse v. France* (dec.). no. 47506/20, 25 March 2025). It follows that the application was introduced out of time and must be rejected in accordance with Article 35 §§ 1 and 4 of the Convention.

For these reasons, the Court, unanimously,

Declares the application inadmissible.

Done in English and notified in writing on 16 October 2025.

Viktoriya Maradudina Acting Deputy Registrar	Diana Kovatcheva President

APPENDIX

Application raising complaints under Article 6 § 1 of the Convention (lack of impartiality of the tribunal in view of the absence of the prosecuting party in administrative-offence proceedings)

Application no. Date of introduction	Applicant's name Year of birth	Representative's name and location	Penalty	Date of final domestic decision Name of court
55277/20 27/11/2020	**Konstantin Anatolyevich BOGDANOV** 1975	Laptev Aleksey Nikolayevich Moscow	fine of RUB 30,000, suspension of driving licence for 1 year and 6 months	Tsentralnyy District Court of Voronezh, 27/02/2020