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in defense of the suspect,  
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Head of the Interdepartmental Investigative and Operational Group  
Head of the Investigative Department  
of the National Bureau for Combating Corruption  
of the Agency of the Republic of Kazakhstan  
for Civil Service Affairs and Anti-Corruption  
**S. N. PEROV**

## **COMPLAINT**

There currently is a criminal case pending before your bureau, namely, case No. 170000131000012 against I.M. Yerimbetov, initiated under Article 193, pt.3, paragraphs B and C of the Criminal Code of the Republic of Kazakhstan.

On November 13, 2017, I.M. Yerimbetov was detained in accordance with Article 128 of the Criminal Procedure Code of the Republic of Kazakhstan.

On November 15, 2017, A.T. Baydauletova, investigative magistrate of district court No.2 of the Medeus district of Almaty, authorized the detention of I.A. Yerimbetov, the suspect.

Currently, the defendant (I.A. Yerimbetov) is being kept in the detention facility of the Almaty department of the National Security Committee (NSC), temporarily located at Detention Facility No.1 of the Penal Correction System Department in Almaty.

On November 20 and 21, 2017, I was denied a talk with him at the detention facility, the denial being justified by the fact that he had been taken out to undergo investigative procedures. However, members of the Interdepartmental Investigative and Operational Group (G.A. Abdullayeva and B. Muzhikov) told me in our telephone conversation that no investigative procedures were taking place at that moment. On November 21, at 10:30 am, the head of Detention Facility No.1 told me that I.M. Yerimbetov had been taken away 30 minutes before and that he kept everything under control at his detention facility.

Only on the morning of November 22, 2017, did I see my defendant. He was very sick, pale, extremely depressed, intimidated; from time to time he fainted, his speech was incoherent, he could not talk at all, he was crying. Also, he was asking for water, and it was obvious that he was hungry, too. When I asked him where he had been, Yerimbetov did not give a clear answer; at first he let slip that he had been taken out [of the detention facilities], later he denied his own words.

Moreover, from his words I understood that he is being kept with convicted criminals and sleeps on the floor.

I am therefore very worried about Yerimbetov's condition; I think there is serious moral and psychological pressure being put on him by the NSC operating officers, since they are the only people that have access to the Detention Facility of the department of the National Security Committee. The reason for my worries is that, being in such condition, he might be coerced into incriminating himself.

The defendant, I.M. Yerimbekov, addressed you personally as the head of the Interdepartmental Investigative and Operational Group in my presence and expressed his willingness to cooperate; there is therefore no need to put any kind of physical or moral pressure on him, bringing him to such a state.

In light of the above, I hereby call on you to intervene immediately, find out where he was taken to and prevent the NSC operating officers from visiting him in the absence of investigators from the Interdepartmental Investigative Group that you are in charge of.

Lawyer [signature] P.Y. Tepsayeva

November 23, 2017