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CERTAIN OBSERVATIONS REGARDING THE CLASSIFICATION OF CRIMINAL PROCEDURAL SANCTIONS AMONG THE MEANS OF PROCEDURAL COERCION

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Abstract. The article examines the legal nature and classification of criminal procedural sanctions within the system of means of criminal procedural coercion under the Criminal Procedure Code of the Republic of Armenia. It analyses the legislator's approach of placing all procedural sanctions in the chapter on "Means of Coercion" and compares it with the legislation of continental legal systems (Russian Federation, Italy, Austria, Georgia, Latvia) and the Anglo-American legal system (United States). The study reveals that the uniform treatment of sanctions as coercive measures in Armenian law contradicts both international practice and fundamental theoretical distinctions between means of coercion and sanctions as forms of legal liability. Drawing on doctrinal sources and the jurisprudence of the U.S. Supreme Court (*Gompers v. Bucks Stove & Range Co.* and *International Union v. Bagwell*), the author proposes clear criteria for distinguishing between restorative/coercive sanctions and punitive sanctions. The paper concludes with concrete recommendations for legislative reform, suggesting the separation of sanctions constituting legal liability into a distinct chapter, following the Georgian legislative model, in order to strengthen the principles of legality, proportionality, and the authority of the judiciary.

Keywords - *criminal procedural sanctions, means of criminal procedural coercion, procedural liability, contempt of court, classification of sanctions, comparative criminal procedure, restorative and punitive sanctions.*

Introduction

Under the Criminal Procedure Code of the Republic of Armenia, criminal procedural sanctions are systematically included within the institution of "Means of Coercion," which implies their perception as means of criminal procedural coercion. However, this approach is not unequivocal, either in theory or in

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comparative law. The study of the criminal procedural legislation of foreign countries demonstrates that criminal procedural sanctions are often not equated with means of coercion and are regarded as an independent legal institution or even as a type of legal liability.

The purpose of this research is to analyse the legal nature of procedural sanctions, the problems of their classification, and their specific features within the criminal procedure system of the Republic of Armenia, while comparing them with the corresponding approaches of both continental and Anglo-American legal systems. Particular attention is paid to the question of whether it is justified to classify all procedural sanctions entirely among the means of criminal procedural coercion, or whether their reinterpretation as a combination of measures of different legal nature is necessary.

Main Research

It is no secret that the Criminal Procedure Code of the Republic of Armenia, like other branch procedural codes, provides separate regulations concerning the grounds and procedure for the application of procedural sanctions. At the same time, unlike the Administrative Procedure Code and the Civil Procedure Code of the Republic of Armenia, where the provisions on sanctions are included in the chapters establishing the general conditions of judicial proceedings, the Criminal Procedure Code of the Republic of Armenia has devoted a separate chapter to the application of criminal procedural sanctions. Thus, Chapter 17 of the Criminal Procedure Code of the Republic of Armenia, entitled "Procedural Sanctions," is entirely devoted to the grounds and procedure for the application of sanctions in criminal proceedings. The legislator's approach is conditioned by the fact that, in addition to sanctions common to all types of proceedings (which exist in all procedural codes), the Criminal Procedure Code of the Republic of Armenia provides for a number of special, specifically criminal procedural sanctions, the need for whose separate and comprehensive regulation indeed existed. Moreover, the legislator placed the chapter on procedural sanctions in Section 4 of the Criminal Procedure Code of the Republic of Armenia, entitled "Means of Coercion," thereby enshrining the position that sanctions constitute means of procedural coercion. In order to form a clear position on the legislator's approach, it is necessary to study the international experience of classifying procedural sanctions, as well as to discuss at the theoretical level the possibility of sanctions being means of criminal procedural coercion.

The study of the criminal procedural legislation of several countries with developed legal traditions shows that procedural sanctions are not distinguished as means of procedural coercion. Moreover, it should be noted that in the criminal

procedural legislation of a number of countries the term “procedural sanction” does not exist at all and, consequently, there is no unified institution of procedural sanctions. For example, the Criminal Procedure Code of the Russian Federation includes bringing a person to court (Article 113) and a court fine (Article 117) in the list of other types of criminal procedural coercion, while the provisions on warning and removal from the courtroom (Article 258) are placed in the chapter establishing the general conditions of judicial proceedings.[1]

Article 131 of the Italian Code of Criminal Procedure stipulates that, in exercising its functions, the court may request the intervention of the criminal police and, if necessary, of national law enforcement agencies, instructing them to carry out all necessary measures to ensure the safe and orderly performance of the functions entrusted to it. Articles 132 and 133 of the same Code provide for the rules concerning the compulsory appearance of the accused and other participants in the proceedings before the court.[2]

Part 2 of Section 2 of the Criminal Procedure Code of the Republic of Austria is entitled “Means of Coercion, Means of Coercion to Perform Obligations and Monetary Fines” and provides for sanctions for improper conduct by participants in criminal proceedings and for failure to perform their procedural obligations.[3] At the same time, Austria has separated means of coercion from court fines, not placing them on the same plane.

The Criminal Procedure Code of Georgia has adopted a different approach: procedural sanctions are applied in Chapter 11 of the Code, entitled “Procedural Liability for Failure to Perform Procedural Obligations and for Violation of Order in Court.” Thus, unlike Russian legislation, Georgian legislation has systematised the rules on the application of procedural sanctions in a single chapter. At the same time, the study of the legislative provisions shows that the Criminal Procedure Code of Georgia, like Russian legislation, does not use the term “procedural sanction” and does not regard the sanction as a type of criminal procedural coercion, but considers it a separate type of procedural liability.[4]

Contrary to the examples presented above, according to Article 288 of the Criminal Procedure Code of the Republic of Latvia, procedural sanctions are means of coercion that the person conducting the proceedings or the investigating

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[1] Criminal Procedure Code of the Russian Federation No. 174-FZ of 18 December 2001 (as amended on 27 October 2025).

[2] Italian Code of Criminal Procedure. Available at: https://canestrinilex.com/assets/Uploads/pdf/-cf70b10e21/Italian-Code-of-Criminal-Procedure-anestriniLex.pdf

[3] **Sopronyuk A**. International Legal Experience of Applying Sanctions in Criminal Proceedings // Legea şi Viaţa. – 2019. – Vol. 332. – No. 8/2. – P. 115.

[4] Criminal Procedure Code of Georgia, Legislative Herald of Georgia – LHG, 31, 03/11/2009. Available at: https://www.matsne.gov.ge/ru/document/view/90034?publication=171

judge may apply to a person who fails to perform the procedural obligations prescribed by law, obstructs the performance of a procedural action, or fails to show respect to the court.[5]

It is evident from the foregoing that the majority of the criminal procedural codes of continental legal system countries (with the exception of Latvia) have avoided defining the procedural sanction as a separate institution; moreover, in almost no case have sanctions been regarded as means of criminal procedural coercion.

Under the circumstances of the issue under discussion, the relevant legal regulations of the Anglo-American legal system cannot be left unexamined. Unlike the continental legal system, the Anglo-American legal system lacks the classical institution of the procedural sanction. At the same time, the Anglo-American legal system contains a separate institution of substantive law — contempt of court (literally translated as "disrespect to the court"). In particular, pursuant to Section 401 of Title 18 of the United States Code, a court is authorised, at its discretion, to punish by fine or imprisonment, or both, such contempt of its authority as (1) misbehaviour of any person in its presence or so near thereto as to obstruct the administration of justice, (2) misbehaviour of any of its officers in their official transactions, or (3) disobedience or resistance to its lawful writ, process, order, rule, decree, or command.[6] In addition, the institution of contempt of court in American law differs from the continental one in that, in American law, "contempt of court" is not an element of procedural law but of substantive law and is perceived as an offence, being divided into civil and criminal "contempt of court."

Thus, summarising the foregoing, it may be stated that both continental and Anglo-American criminal procedural legislation have for the most part not regarded procedural sanctions as means of criminal procedural coercion. The exceptions are the criminal procedural legislation of the Republic of Armenia and Latvia, which, without any distinction, have regarded all procedural sanctions as means of criminal procedural coercion. This, in our view, is a problematic approach for a number of reasons that will be discussed below.

The Criminal Procedure Code of the Republic of Armenia has not defined the concept of a means of procedural coercion and has used this term only in other relevant articles of the Code. In other words, in the absence of a legislative clarification of the term, it is necessary to refer to theoretical interpretations in

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[5] Criminal Procedure Law of Latvia. Available at: https://sherloc.unodc.org/cld/uploads/res/-document/criminal-procedure-law_html/Latvia_Criminal_Procedure_Law_2005_As_Amended_2013.pdf

[6] 8 U.S.C. § 401 (2023). Available at: https://www.law.cornell.edu/uscode/text/18/401

order to determine its essence and content. Thus, in the narrow sense, means of criminal procedural coercion are the means of coercion applied by state bodies and officials within the scope of their powers to participants in criminal proceedings during the conduct of a criminal case in order to ensure their proper conduct.[7] According to a broader interpretation, means of procedural coercion are special mechanisms that ensure the compulsory performance of obligations by those participants who are not officials (prosecutor, investigator, inquirer) or defence counsel. Essentially, criminal procedural coercion implies the process of subjecting a private (natural) person to coercion by a person acting with state authority.[8]

It is evident from the above that means of criminal procedural coercion are types of state coercion applied within the framework of criminal proceedings; however, it is clear that criminal procedural coercion is not the only type of state coercion that may be applied within the procedures of criminal proceedings. In particular, according to the position of V.M. Kornukov, the state coercion applied within the framework of criminal proceedings is a broader concept that includes procedural liability, procedural sanctions, and the means of procedural coercion proper.[9] Moreover, procedural liability is considered a type of legal liability and is always based on the fact of violation or non-performance of the requirements of criminal procedural norms. It manifests itself in the form of punishing a person for unlawful conduct (for example, imposing a court fine or a penalty).[10] The nature of means of criminal procedural coercion is different, and the law does not link the application of the majority of these means to a violation of criminal procedural norms; therefore, they do not constitute means of legal liability.[11] In addition, while the purposes of legal liability are universally recognised and specifically punitive, restorative and educational,[12] criminal procedural coercion has its own special purposive orientation, which derives from the general tasks of criminal proceedings and the objectives of the successful administration of justice.[13]

In general, coercive measures are used to compel people to do what they do not wish to do. In criminal proceedings, coercive measures may be applied by the

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[7] **Teppeev A.A.** The Concept of Measures of Criminal Procedural Coercion and Their Types // Gaps in Russian Legislation. 2020. No. 4. URL: https://cyberleninka.ru/article/n/ponyatie-mer-ugolovno-protsessualnogo-prinuzhdeniya-i-ih-vidy (accessed: 26.04.2026). P. 236.

[8] **Golovko L. V. et al**. Course of Criminal Procedure. – 2017. P. 521.

[9] **Kornukov V. M.** Measures of Procedural Coercion in Criminal Proceedings. – Saratov University Publishing House, 1978. P. 9.

[10] ibid., P. 10.

[11] ibid., P. 13.

[12] **Solovyov A. R.** Goals and Functions of Legal Liability // Bulletin of the Master's Degree. 2019. No. 4-2 (91). URL: https://cyberleninka.ru/article/n/tseli-i-funktsii-yuridicheskoy-otvetstvennosti (accessed: 02.05.2026). P. 196.

[13] **Kovriga Z. F.** Criminal Procedural Coercion. – Voronezh University Publishing House, 1975. P. 23.

bodies conducting the proceedings to compel participants in criminal proceedings to perform their obligations or to refrain from certain actions, and such measures restrict the fundamental constitutional rights of the accused and other persons.[14] In addition, coercive measures are applied without the need to assess guilt, since their application is based on a reasonable presumption of possible unlawful conduct.[15]

Summarising the above, it may be asserted that a measure of legal influence is considered a means of criminal procedural coercion if: (1) it is applied by a state official to a private person; (2) its primary purpose is to ensure the performance by the person of his or her procedural obligations and to prevent unlawful conduct; (3) it does not constitute a type of liability for an act; and (4) there is no need to assess the person's guilt for its application.

Therefore, in order to form a well-founded position on the procedural nature of procedural sanctions, it is necessary to compare their content with the criteria set out above.

First of all, it should be noted that theoretical literature itself states that the concepts of "coercive measure" and "punitive measure" (sanction) should not be equated, since all procedural codes distinguish between protective procedural measures and measures of influence on violators of the process (punitive measures, sanctions).[16]

At the same time, it is worth noting that there are sanctions that were initially accepted and perceived as means of procedural coercion; for example, compulsory appearance before the body conducting the proceedings is a classic means of procedural coercion. Compulsory appearance before the body conducting the proceedings (bringing to court) is recognised by theory as a classic restorative sanction,[17] which is logical, since its purpose is to ensure the person's participation in the procedural action.

A warning is also a means of procedural coercion; it is an instruction addressed to a person to display proper conduct or to comply with the orders of an authorised person. In other words, a warning has a preventive nature — it is an action of the body conducting the proceedings aimed at preventing a possible gross procedural violation through an instruction.

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[14] **Róth E.** Coercive Measures in Criminal Proceedings. In: Váradi-Csema E. (Ed.), Criminal Legal Studies: European Challenges and Central European Responses in the Criminal Science of the 21st Century. Central European Academic Publishing, 2022. P. 337.

[15] **Melnikov V. Y., Garaeva T. B**. Grounds, Conditions and Purposes of Application of Other Measures of Procedural Coercion // Law and Practice. 2019. No. 4. URL: https://cyberleninka.ru/article/n/osnovaniya-usloviya-i-tseli-primeneniya-inyh-mer-protsessualnogo-prinuzhdeniya (accessed: 03.05.2026). P. 193.

[16] **Popova Z. V.** Sanctions in the Law Enforcement Process: Concept, Types, Grounds for Application: PhD Thesis in Law. Moscow, 2008. P. 27.

[17] **Zaderako K. V**. Other Measures of Procedural Coercion: PhD Thesis in Law. Rostov-on-Don, 2005. P. 73.

Restriction of the exercise of a right has a preventive character, since it prevents actions of a participant in the proceedings aimed at abusing the right. In other words, like a classic coercive measure, it aims to neutralise the possibility of a future violation.

Removal from the courtroom, however, has a punitive character, since it is applied in the event of a violation or non-performance of a warning — that is, a preventive action — and in fact punishes the offender by depriving him or her of the right to be present at the court session. A court fine is by its nature a punitive procedural sanction, since it creates adverse consequences for participants in criminal proceedings and other persons in the form of a financial burden — property losses resulting from the commission of an offence, failure to perform procedural obligations, or non-compliance with lawful orders of state bodies.[18]

The situation is more complicated with regard to removal from the proceedings. Under the ground provided for in point 1 of part 2 of Article 147 of the Criminal Procedure Code of the Republic of Armenia — that is, failure to appear at a court session more than twice without a valid reason — the application of the sanction may also be regarded as a restorative means of coercion, viewing it as ensuring the performance of their obligations by the defence or the prosecution. However, under the ground provided for in point 2 of part 2 of the same Article — malicious continued non-performance of obligations after having been subjected to a procedural sanction three times — the matter is already one of the application of a sanction of a punitive nature, since the ground is the establishment of a new, stricter liability in the conditions of previous offences when the measures of influence applied were lenient.

It is clear from all of the foregoing that part of the procedural sanctions established by the Criminal Procedure Code of the Republic of Armenia are indeed means of procedural coercion, whereas several sanctions do not meet the criteria of a means of procedural coercion and constitute separate types of legal liability. Our position is also based on Decision No. SD O-851 of the Constitutional Court of the Republic of Armenia, by which the High Court, addressing Article 314.1 of the former Criminal Procedure Code of the Republic of Armenia, recognised judicial sanctions as a type of legal liability and the acts constituting the grounds for procedural sanctions as offences.[19]

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[18] **Kuzovenkova Yu.** A. Monetary Penalty in the System of Measures of Criminal Procedural Liability: PhD Thesis in Law. Samara, 2009. P. 59.

[19] Decision No. SD O-851 of the Constitutional Court of the Republic of Armenia of 14 January 2010.

Consequently, the problem arises of distinguishing between procedural sanctions that constitute means of procedural coercion and sanctions that constitute a separate type of legal liability, and of drawing a clear boundary between them.

This problem has been addressed by American doctrine and judicial practice. As we have already noted, in United States law the sanction is regarded as a separate type of liability — contempt of court — within the framework of the legal doctrine, which is intended to prevent and punish conduct that obstructs the administration of justice. Having arisen in English common law as a mechanism for protecting the authority of the Crown, it gradually came to be regarded as a power inherent in the courts themselves.[20]

Moreover, the nature of contempt of court is traditionally divided into two main classifications that serve entirely different purposes: criminal contempt and civil contempt. The former is intended to restore the authority and dignity of the court and to punish the offender for past disobedience. Civil contempt, on the other hand, is primarily of a restorative and coercive nature, intended for the benefit of the plaintiff to compel the resisting defendant to comply with the court's decision.[21] Consequently, in the case of the application of sanctions of a restorative or coercive nature, ordinary civil procedural rules suffice, whereas in the case of sanctions of a punitive nature, criminal procedural rules are required.[22]

The boundary between civil and criminal contempt was addressed by the United States Supreme Court, which established clear criteria for distinguishing them, particularly in the decision in *Gompers v. Bucks Stove & Range Co.*[23] In particular, the Court stated in that decision: "If the case is one of civil contempt, the legal effect is of a restorative nature and directed to the protection of the interests of the complainant. If the case is one of criminal contempt, the legal effect is of a punitive nature, aimed at protecting and restoring the authority and power of the court."

In addition, the most important feature of civil contempt is its conditional nature; that is, the offender must be able to "purge" the contempt and avoid punishment by complying with the requirements.[24]

In another case, *Bagwell*, the United States Supreme Court advanced a new criterion, according to which the application of civil contempt has a prospective, that is, future-oriented, purpose.[25] In other words, fixed, specific fines or other

[20] **Goldfarb R.** The History of the Contempt Power // Washington University Law Quarterly. – 1961. – P. 7.
[21] **Livingston M.** Disobedience and Contempt // Washington Law Review. – 2000. – Vol. 75. P. 9.
[22] ibid., P. 4.
[23] Gompers v. Bucks Stove & Range Co., 221 U.S. 418 (1911).
[24] **Livingston M.** Disobedience and Contempt // Washington Law Review. – 2000. – Vol. 75. P. 33.
[25] International Union, United Mine Workers of America v. Bagwell, 512 U.S. 821 (1994).

liability measures imposed for past disobedience are of a strictly criminal sanction nature. By contrast, daily fines or indefinite imprisonment that accumulate until the respondent complies are classified as coercive civil contempt.

We consider that the foregoing may be compared with the legal regulations of the domestic legal system in order to distinguish between sanctions established by the Code of Procedure as means of coercion and other sanctions constituting judicial legal liability. For this purpose, we propose the following criteria:

- The function of the applied measure — for example, whether it has a punitive function, as in the case of a court fine, or serves to ensure the performance of a specific action, as in the case of compulsory appearance before the body conducting the proceedings;
- The primary purpose of the measure — for example, whether it is to impose legal liability for an already committed offence or to ensure future lawful conduct;
- The primary object of the offence — that is, whether the offence encroached upon the authority of the judiciary or upon the normal course of proceedings or the rights of another participant in the proceedings.

In the light of the aforementioned criteria and the theoretical interpretations cited in the work, we classify the entire body of procedural sanctions into two groups: means of procedural coercion and types of legal liability (sanctions). The sanctions constituting means of procedural coercion are: warning, compulsory appearance before the body conducting the proceedings, and restriction of the exercise of a right. The sanctions constituting types of legal liability are: removal from the proceedings, court fine, and removal from the courtroom. Therefore, in the context of the above, we consider it expedient to separate in the Criminal Procedure Code of the Republic of Armenia the sanctions regarded as types of legal liability from the means of coercion, following the example of the Criminal Procedure Code of Georgia already cited. Under such conditions, it will be possible to ensure the lawfulness of the application of these measures as a type of legal liability.

Conclusion

The foregoing analysis permits the conclusion that the institution of procedural sanctions established by Chapter 17 of the Criminal Procedure Code of the Republic of Armenia, despite its extensive regulation, contains internal inconsistencies. The legislator's uniform treatment of all sanctions as means of procedural coercion does not correspond either to international practice or to the fundamental provisions of criminal procedural theory. The study of continental and

Anglo-American legal systems shows that procedural sanctions are, as a rule, not equated with means of coercion but are often regarded as a separate type of legal liability (Georgia, Russia, the United States) or as an institution regulated within the framework of general procedural conditions.

At the theoretical level, a clear distinction is drawn between means of procedural coercion (as an instrument of state authority directed towards the compulsory performance of obligations) and sanctions of procedural liability (as punitive-restorative influence for an offence). Among the sanctions provided for by the Criminal Procedure Code of the Republic of Armenia, warning, compulsory appearance before the body conducting the proceedings, and restriction of the exercise of a right correspond to the criteria of means of coercion, whereas a court fine, removal from the courtroom, and removal from the proceedings (in certain cases) are of a punitive nature and constitute forms of legal liability.

On the basis of the theoretical foundations of this distinction, as well as the criteria developed by the United States Supreme Court (*Gompers* and *Bagwell* cases), it is proposed to carry out a systemic reform of procedural sanctions in the Criminal Procedure Code of the Republic of Armenia. In particular, it is expedient to follow the legislative model of Georgia by transferring the sanctions of procedural liability to a separate chapter or subsection and by clarifying the grounds, procedures, and guarantees for their application. Such a distinction will strengthen the principles of legality, proportionality, and fairness of proceedings, will enhance the authority of the judiciary, and will correspond to the requirements of contemporary criminal procedural theory.

Thus, the further improvement of the institution of procedural sanctions should become the subject not only of legislative but also of scientific-practical discussion aimed at increasing the effectiveness of domestic criminal procedure.

Conflict of Interests
The authors declare no ethical issues or conflicts of interest in this research.
Ethical Standards
The authors affirm this research did not involve human subjects.

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