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**CRIMINAL LIABILITY FOR OBSTRUCTING
THE IMPLEMENTATION OF THE CITIZENS VOTING
RIGHTS OR THE RIGHT TO PARTICIPATE
IN THE REFERENDUM IN UKRAINE
AND THE INDIVIDUAL MEMBER STATES
OF THE COMMONWEALTH OF INDEPENDENT
STATES: COMPARATIVE-LEGAL ANALYSIS
ON THE EXAMPLE OF THE RUSSIAN FEDERATION
AND BELORUSSIA**

The article is devoted to the comparative-legal aspect features of criminal liability for obstructing the implementation of the citizens of voting rights or the right to participate in the referendum in Ukraine and the Russian Federation and Belorussia.

The author tries to fully and completely disclose the issue of criminal responsibility, which occurs in the case of a person of a crime under Article 157 of the Crim-

inal Code of Ukraine. He refers to the same standards of foreign criminal law, which also provides for responsibility for a crime, the object of which is to attack the social relations that arise during the citizens electoral and referendum rights, to form the corresponding propositions implementation of positive foreign experience domestic criminal law, as well as to improve certain provisions of Article 157 of the Criminal Code of Ukraine.