

MONGOLIA

- **MNG-09:** Bulgantuya Khurelbaatar
- **MNG-01:** Zorig Sanjasuuren



Inter-Parliamentary Union
For democracy. For everyone.

Mongolia

Decision adopted unanimously by the IPU Governing Council at its 217th session (Istanbul, 19 April 2026)



© Ms. Bulgantuya Khurelbaatar

MNG-09 – Bulgantuya Khurelbaatar

Alleged human rights violations

- ✓ Threats, acts of intimidation
- ✓ Lack of due process at the investigation stage
- ✓ Lack of fair trial proceedings
- ✓ Right of appeal
- ✓ Violation of freedom of opinion and expression
- ✓ Violation of freedom of movement
- ✓ Failure to respect parliamentary immunity

A. Summary of the case

On 16 October 2025, Ms. Bulgantuya Khurelbaatar (Ms. Bulgantuya.Kh), a member of the State Great Hural of Mongolia and then Deputy Speaker, chaired a plenary session to deliberate on a motion regarding the dismissal of the then Prime Minister of Mongolia. The then Speaker of Parliament, who was also the subject of a dismissal motion due to be discussed on the same day, unexpectedly resigned a day prior to the session. Ms. Bulgantuya.Kh was therefore the official acting Speaker of the State Great Hural.

On the day of the vote (16 October 2025), several members of the State Great Hural were allegedly physically prevented from entering the plenary chamber and threatened with criminal prosecution if they attempted to participate in the vote. The complainant also stated that the members of the Standing Committee on State Structure, who had initially supported the motion to dismiss the former Prime Minister, had backtracked on their decision. The Standing Committee's unexpected decision, coupled with threats directed at several MPs, made it impossible to reach a quorum on 16 October to proceed with the vote. According to article 27 of the Mongolian Constitution on quorum, "the

Case MNG-09

Mongolia: Parliament affiliated to the IPU

Victim: Female majority Member of Parliament

Qualified complainant(s): Section I.1(a) of the Committee Procedure (Annex I)

Submission of complaint: February 2026

Recent IPU decision: - - -

Recent IPU mission(s): - - -

Recent Committee hearing: - - -

Recent follow-up:

- Communication from the authorities: Letter from the Chairman of the State Great Hural (April 2026)
- Communication from the complainant: April 2026
- Communication addressed to the authorities: Letter addressed to the Chairman of the State Great Hural (March, April 2026)
- Communication addressed to the complainant: April 2026

presence of an overwhelming majority of members of the National Parliament is required to consider a session valid, and decisions are taken by a majority of all members present if the Constitution and other laws do not provide otherwise.” In addition, Article 7, paragraph 1 of the Law on the Rules of Procedure of the Plenary Session of the State Great Hural states: “A session shall be deemed valid if a majority of the members are present.”

In his letter to the IPU Secretary General dated 8 April 2026, the Chairman of the State Great Hural stated that immediately thereafter, and before a vote was cast in Parliament, the then Prime Minister submitted a petition to the Constitutional Court challenging the Deputy Speaker’s actions and affirming that they violated Article 43.1 of the Constitution and Articles 101.3 and 101.4 of the Law on the Rules of Procedure of the Plenary Session of the State Great Hural.

However, following legal advice from the Secretariat of the State Great Hural, Ms. Bulgantuya.Kh maintained the parliamentary session open until the next day, and voting took place based on the number of MPs who had registered their attendance the day before and those present on 17 October 2025. In his letter to the IPU Secretary General dated 8 April 2026, the Chairman of the State Great Hural provided additional information, stating that the wording used by Ms. Bulgantuya.Kh to introduce the motion was the subject of a debate between Members of Parliament. The complainant explained that the parliamentary Secretariat had advised the acting Speaker to proceed with the vote to respect the legal timeframe for discussing the motion to dismiss the then Prime Minister. As such, on 17 October 2025, based on the number of MPs present and those who had registered their attendance the day before, 71 out of 126 MPs voted to oust the then Prime Minister.

The complainant argued that, in handling the then Prime Minister’s petition, the Constitutional Court consolidated two distinct matters – an institutional resolution and an individual official’s conduct, despite differing constitutional procedures for each, and rejected Ms. Bulgantuya.Kh’s request to separate the two cases, arguing in its decision of 22 October 2025, that “these issues were interrelated and there was therefore no basis to decide them separately”. According to the complainant, the Court also denied Ms. Bulgantuya.Kh’s right to a fair trial as she had limited time to prepare her defence and was prevented from calling specialists knowledgeable in parliamentary proceedings to justify her decision to maintain the parliamentary session open.

On 22 October 2025, the Constitutional Court convened in a closed hearing and found that Ms. Bulgantuya.Kh’s conduct and the procedure that led to the dismissal of the then Prime Minister were unconstitutional. The Court identified irregularities in the way attendance and voting were recorded during the two relevant plenary sittings of 16 and 17 October. In particular, the Court found that the attendance and vote counts from the two consecutive sittings had been improperly aggregated. In its decision, the Court also found that the wording used by Ms. Bulgantuya.Kh to announce the vote, “I support the proposal that the Standing Committee did not support” (i.e. the dismissal of the Prime Minister), or words to that effect, violated Article 43, paragraph 1 of the Constitution. The Court concluded that this wording effectively changed the legal nature of the voting act and created conditions for procedural irregularity. According to the Court, this formulation was inconsistent with the procedural safeguards required by the Constitution for decisions of such gravity.

Despite the Constitutional Court’s decision reinstating the then Prime Minister, the latter filed a separate complaint under Criminal Law 19.2 against Ms. Bulgantuya.Kh accusing her of organizing the unlawful seizure of the State Great Hural. The General Intelligence Agency initiated proceedings within a day of that complaint, as the matter was considered a threat to national security.

In the same letter dated 8 April 2026, the Chairman of the State Great Hural stated that following the decision of the Constitutional Court of Mongolia, the caucus of the Mongolian People’s Party (MPP), Ms. Bulgantuya.Kh’s own political party, had sent the other Deputy Speaker, Mr. B. Purevdoj, an official letter on 30 October 2025 deciding to dismiss Ms. Bulgantuya.Kh as Deputy Speaker. On 12 November 2025, during a plenary session, the State Great Hural dismissed Ms. Bulgantuya.Kh from her position of Deputy Speaker. The Chairman added that her parliamentary mandate, however, had not been terminated and that no further decision nor additional measures had been taken by the State Great Hural against her. In his letter, the Chairman also stated that while it would not be appropriate to express a definitive view on a matter that has not yet been finally resolved, the State Great Hural remained firmly committed to the principles of the rule of law and due process and would continue to pay due attention to the protection of the legal right of Ms. Bulgantuya.Kh as a Member of Parliament.

As a result of the proceedings initiated against her, Ms. Bulgantuya.Kh is subject to a travel ban without any formal justification from the General Intelligence Agency, which has also denied her requests to call specialists knowledgeable in parliamentary proceedings. Although her parliamentary immunity has yet to be lifted, the complainant alleges that since October 2025, Mr. Bulgantuya.Kh has been a victim of social media campaigns aiming to discredit her, harm her image, and foster the public's hatred towards her, including by assuming her guilt and stating that the Prosecutor General has already requested the lifting her immunity, which has yet to happen. However, the complainant argues that it is only a matter of time before the State Great Hural lifts her parliamentary immunity.

Simultaneously, the Parliament is currently examining a bill submitted by the President of the country on the "Right to Recall" Members of Parliament if they commit ethical violations or have a court decision pending against them, including a Constitutional Court ruling. The proposed bill also enables political parties to recall their own MPs if they deem it necessary. According to the complainant, the bill was submitted to Parliament under an expedited procedure, following consultations with the Government. On 16 April 2026, the State Great Hural approved the draft bill for an initial discussion.

If convicted, Ms. Bulgantuya.Kh could face imprisonment for 10 to 12 years and expulsion from her political party, in accordance with the provisions of the "Right to Recall" bill.

B. Decision

The Governing Council of the Inter-Parliamentary Union

1. *Thanks* the Chairman of the State Great Hural for his letter received on 15 April 2026 and the information provided, including a copy of the decision of the Constitutional Court of Mongolia;
2. *Notes* that the complaint concerning the case of Ms. Bulgantuya Khurelbaatar (Ms. Bulgantuya.Kh) is admissible, considering that the complaint: (i) was submitted in due form by a qualified complainant under section I.1(a) of the Procedure for the examination and treatment of complaints (Annex I of the Rules and Practices of the Committee on the Human Rights of Parliamentarians); (ii) concerns an incumbent Member of Parliament at the time of the allegations; and (iii) deals with allegations of lack of fair trial proceedings, lack of due process at the investigation stage, failure to respect parliamentary immunity, threats, acts of intimidation and violations of the rights to appeal, freedom of movement, and freedom of expression, which are allegations that fall within the Committee's mandate;
3. *Is deeply concerned* about the disproportionate criminal proceedings initiated against Ms. Bulgantuya.Kh by the General Intelligence Agency on accusations of unlawful seizure of the State Great Hural for carrying out her duties as the official acting Speaker of the State Great Hural and chairing a parliamentary session aiming to discuss a motion submitted by another Member of Parliament to vote on the dismissal of the then Prime Minister;
4. *Regrets* the failure to respect Ms. Bulgantuya.Kh's parliamentary immunity, given that she is currently the subject of criminal charges before any formal proceedings to waive her immunity have been initiated;
5. *Is concerned* about the online intimidation reportedly suffered by Ms. Bulgantuya.Kh and the harassment campaigns initiated against her which aim to discredit her, harm her image and foster the public's hatred towards her, including by portraying her as guilty before the conclusion of the legal proceedings against her; and *calls on* the Mongolian authorities to ensure Ms. Bulgantuya.Kh's safety and right to a fair trial by identifying the individuals responsible for such campaigns and holding them to account;
6. *Notes with concern* that the decision issued by the Constitutional Court against Ms. Bulgantuya.Kh has led the State Great Hural to adopt a resolution dismissing her from her position of Deputy Speaker in the absence of any independent parliamentary procedure that would have provided her with the opportunity to defend herself and argue her case before Parliament and her peers;
7. *Takes note* of the current "Right to Recall" bill under review by the Parliament of Mongolia; *expresses concern* about the bill's significant consequences for the exercise of the parliamentary

mandate, the individual rights of Members of Parliament and the Parliament as a whole; *calls on* the parliamentary authorities of Mongolia to ensure that the draft bill is in line with the Mongolian Constitution; and *affirms* the IPU's readiness to support its review to ensure its compliance with established human rights standards;

8. *Requests* the Secretary General to convey this decision to the relevant authorities, the complainant and any third party likely to be in a position to supply relevant information;
9. *Requests* the Committee to continue examining this case and to report back to it in due course.



Inter-Parliamentary Union
For democracy. For everyone.

Mongolia

Decision adopted by the Committee on the Human Rights of Parliamentarians at its 179th session (Geneva, 2 to 18 February 2026)



© Zorig Foundation

MNG-01 – Zorig Sanjasuuren

Alleged human rights violations

- ✓ Murder
- ✓ Impunity

A. Summary of the case

Mr. Zorig Sanjasuuren (“Mr. Zorig”) was assassinated on 2 October 1998. Regarded by many as the father of the democratic movement in Mongolia in the 1990s, Mr. Zorig was a member of parliament and acting Minister of Infrastructure at the time and was being considered as a candidate for the position of Prime Minister on the day he was killed.

Between 2015 and 2017, three suspects were identified, arrested, expeditiously tried and sentenced based on classified evidence, during trials held behind closed doors. Several reports indicated that the suspects were allegedly tortured to force them to make false confessions and framed by the intelligence services. The murder of Mr. Zorig is widely believed to have been a political assassination that was covered up. The investigation into the mastermind(s) of his murder is still open and has not yet yielded any results.

Despite the government declassification order of several files relating to the Zorig case in December 2017, the lack of transparency is still prevalent, as the court verdicts have remained inaccessible.

Case MNG-01

Mongolia: Parliament affiliated to the IPU

Victim: Member of the majority

Qualified complainant(s): Section I.1(a) of the Committee Procedure (Annex I)

Submission of complaints: October 2000, March 2001, September 2015

Recent IPU decision: February 2024

IPU Missions: August 2001, [September 2015](#), [September 2017](#), [June 2019](#)

Recent Committee hearing: Hearing with the Mongolian delegation to the 141st IPU Assembly (October 2019)

Recent follow-up:

- Communication from the authorities: Letter from the Deputy Speaker of the State Great Hural (February 2025)
- Communication from the complainants: January 2026
- Communication addressed to the authorities: Letter addressed to the Chairman of the State Great Hural (January 2026)
- Communication addressed to the complainants: January 2026

Since the submission of the complaint 20 years ago, the Committee has undertaken three fact-finding missions to Mongolia at crucial phases in the case. In June 2019, the Committee returned to Mongolia following the invitation of the parliamentary authorities and was updated on the important developments in the case, in particular the release of a video in March 2019 showing the torture and ill-treatment of two of the convicts, Ms. Chimgee and Mr. Sodnomdarjaa, as well as the establishment of a parliamentary *ad hoc* committee on the case of Mr. Zorig. The two convicts in question were transferred to the prison hospital as a result of the video and a criminal case was opened against intelligence and law enforcement officials allegedly responsible for torturing them. Nevertheless, they remained in detention at that time.

On 22 July 2020, the Ulaanbaatar Court of First Instance concluded that Ms. Chimgee and Mr. Sodnomdarjaa had been tortured during the investigation into this crime. It convicted the former Chief of the General Intelligence Agency, Mr. Bat Khurts, as well as other intelligence officers, to prison terms ranging from one to three years for their involvement in the torture. However, on 30 October 2020, the appeals court dismissed the verdict and ordered a retrial of the case, arguing that the first-instance court had made a wrongful interpretation of the Criminal Code and violated two articles of the Code on Criminal Procedure. In their letter of 23 February 2021, the parliamentary authorities stated that Mr. Khurts and the other defendants in the torture case had been released on bail on 23 November 2020 due to the annulment of the case by the appeals court. However, on 31 March 2021, the Supreme Court of Mongolia convicted Mr. Khurts of torture in relation to the Zorig case and sentenced him to one and a half years in prison. Similarly, the former deputy prosecutor, Mr. Erdenebat, was reportedly sentenced to one year in prison by the Supreme Court for his responsibility for the acts of torture.

According to the complainants, on 10 March 2021, the Mongolian Government allegedly issued a decree to declassify the video showing that in 2015 Ms. Chimgee was allegedly drugged, undressed by investigators and had her fingerprints taken. The Minister of Justice reportedly tweeted that the "Government Cabinet meeting of 31 March 2021 decreed that all recordings (without specifying which ones) related to the Zorig case will be declassified".

On 14 May 2021, the Supreme Court of Mongolia ordered the release on bail of Ms. Chimgee and Mr. Sodnomdarjaa and returned the case of Mr. Zorig for further investigation. However, the court has not officially abandoned legal proceedings against Ms. Chimgee and Mr. Sodnomdarjaa, given that the Zorig case is subject to further investigation.

In her letter of 5 February 2025, the then Deputy Speaker of the State Great Hural, Ms. Bulgantuya Khurelbaatar stated that the General Intelligence Agency and the National Police Agency had issued decrees establishing a joint working group to conduct an investigation under the supervision of the Prosecutor's Office. In that same letter of February 2025, the parliamentary authorities also indicated that the former Speaker of the State Great Hural had established a parliamentary working group to oversee the ongoing investigation and work toward the restoration of the rights of the individuals who were wrongfully charged with the murder of Mr. Zorig. The parliamentary authorities have yet to provide updated information about the progress of these working groups.

B. Decision

The Committee on the Human Rights of Parliamentarians

1. *Thanks* the former Deputy Speaker of the State Great Hural for the information provided in her letter of 5 February 2025;
2. *Welcomes* the establishment of the joint working group by the General Intelligence Agency and the National Police Agency to investigate the case, as well as the establishment of the parliamentary working group tasked with overseeing the ongoing investigation, which illustrates the authorities' commitment to establishing the truth in the case of Mr. Zorig and determining the identity of his assassins;
3. *Regrets*, however, the lack of official information from the Mongolian parliamentary authorities about these two entities since their establishment in 2024, despite its repeated requests; and *calls* on the State Great Hural to provide detailed information about the mandate of these two working groups, their composition and the work they have achieved so far, including whether they have been granted a full and unhindered access to all declassified files in the Zorig case;

4. *Sincerely hopes* that the Mongolian judicial authorities will abandon once and for all, the legal proceedings against Ms. Chimgee and Mr. Sodnomdarjaa in light of their torture and mistreatment and the conviction by the Supreme Court of Mongolia of several high-level individuals responsible for their torture and miscarriage of justice; and *firmly believes* that with the earlier acquittal of these two individuals, the authorities now have the opportunity and responsibility to follow potentially plausible leads to identify the true masterminds of Mr. Zorig's murder;
5. *Reaffirms* that the resolution of the Zorig case would be a landmark achievement for the Mongolian authorities in upholding human rights and that transparency is an important step in the pursuit of justice in this case, which can only be achieved when the identity of the masterminds responsible for murdering Mr. Zorig is established; *renews its call*, therefore, for the authorities to ensure a robust and effective investigation into establishing the identity of those accountable for this crime and to allow unhindered access to all relevant documents; and *reiterates its wish* to be kept regularly apprised of all significant developments, including with regard to any progress made;
6. *Requests* the Secretary General to convey this decision to the relevant authorities, including the Minister of Justice, the complainants and any third party likely to be in a position to supply relevant information;
7. *Decides* to continue examining this case.