

OPEN-SOURCE INTELLIGENCE DOSSIER



THE TRANS WESTERN THREAT

*How Authoritarian Regimes, Nationalist Movements, and Modern Dictators
Weaponize Transgender Women to Fabricate Existential Threats and Defend the
Mirage of Sovereignty against the West*

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METHOD & STANDARDS

Sourcing. Every factual claim is tied to a numbered source in the Sources section. Facts were verified against live sources at the time of writing; where reporting conflicted, the dossier uses the most authoritative or most recent account and says so. No source has been invented, and no quotation exceeds a short phrase.

Facts versus judgments. Documented events are stated plainly with citations. Analytic judgments — inferences about motive, strategy or causation — are labelled *Assessment* and carry a confidence level: **High** (multiple independent, consistent sources; few plausible alternatives), **Moderate** (credible evidence but meaningful gaps or rival explanations), or **Low** (plausible inference from fragmentary evidence).

Scope. The dossier focuses on transgender women because they are the most frequent rhetorical target of the “gender ideology” frame, but the laws examined usually reach all LGBTQ+ people — and, as Chapter 9 shows, frequently reach everyone else as well. “The West” is treated throughout as a *rhetorical construct* deployed by the regimes under study, not as an endorsement of any particular Western government’s record.

A note on fairness. This is an argued dossier with a thesis. Because sincere people disagree about several of the questions it touches — especially youth medical care, sex-based legal categories and the role of public opinion — Chapter 11 sets out the strongest competing explanations and counter-arguments, including where the evidence cuts against the thesis.

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EXECUTIVE SUMMARY

BOTTOM LINE UP FRONT

ACROSS A WIDENING ARC OF STATES — FROM MOSCOW TO TBILISI, BUDAPEST TO ASTANA, Kampala to Accra and Ouagadougou — governments under strain have converged on a common political technology. They take one of the smallest and least powerful groups in any society, transgender people and above all transgender women, and recast its existence as an imported weapon aimed at the nation’s children, its birth rate and its independence. The minority becomes a proxy for “the West”; the law against it becomes an act of national defence; and the regime that passes that law presents itself as the last guardian of sovereignty.

This dossier documents that technology from open sources and argues that the sovereignty it claims to defend is largely a mirage. The same legal tools built against trans women — propaganda bans, “extremism” designations, “foreign agent” registries, fixed-at-birth sex markers, assembly bans enforced by facial recognition — have repeatedly been extended to publishers, nightclub owners, journalists, protesters, NGOs and even citizens who publicly decline to have children. The panic is manufactured; the expansion of state power it licenses is real.

The record also shows the strategy is neither inevitable nor invincible. In Hungary, the government’s 2025 attempt to ban Budapest Pride produced the largest Pride march in the country’s history, and the governing party lost its supermajority in the April 2026 election; in the same month the Court of Justice of the European Union, sitting as a full court, held that Hungary’s 2021 anti-LGBTQ “child protection” law breached the Union’s founding values.

^{19,24,26} The regimes’ claim to speak for an unchanging national tradition is contradicted by their own legal histories, including colonial-era statutes, a 1987 Iranian fatwa recognising gender transition, and Burkina Faso’s six decades without any law against same-sex relations. ^{50,57,62}

KEY JUDGMENTS

KJ-1 • A SHARED PLAYBOOK EXISTS

HIGH CONFIDENCE

Russia’s legislative sequence — propaganda ban (2013), extension to adults (2022), a ban on legal and medical transition (2023) and the “extremist” designation of a non-existent “international LGBT movement” (2023) — has served as a template that Kyrgyzstan, Georgia, Bulgaria and Kazakhstan have reproduced in close textual and structural form. ^{1,3,4,30,38,40,43}

KJ-2 • THE MINORITY IS FRAMED AS A FOREIGN WEAPON**HIGH CONFIDENCE**

Officials in Russia, Kazakhstan, Georgia, Türkiye and Ghana explicitly frame gender diversity as something imposed from abroad, and Russia's 2022 state-policy decree names the United States and "unfriendly states" as threats to the nation's values and demography. [9,10,52,61,83](#)

KJ-3 • THE TOOLS SPREAD BEYOND THEIR FIRST TARGET**HIGH CONFIDENCE**

Russia added "childfree propaganda" to the same administrative article that punishes LGBT "propaganda"; extremism charges have reached book publishers and a nightclub owner; Hungary's sovereignty and assembly laws reach NGOs, media and protesters. [7,8,12,22,23](#)

KJ-4 • CRACKDOWNS CLUSTER AROUND LEGITIMACY STRESS**MODERATE CONFIDENCE**

Major anti-LGBTQ measures frequently coincide with elections, wars, coups or economic crises (Ghana's 2022–2024 inflation and IMF bailout; Hungary's pre-election Pride ban; Georgia's pre-election "family values" law). Genuine popular hostility, however, means distraction is rarely the *only* driver. [36,50,55,77,81](#)

KJ-5 • THE "ANTI-WESTERN" MOVEMENT IS PARTLY WESTERN-FUNDED**HIGH CONFIDENCE**

Of more than US\$700 million identified in anti-gender funding in Europe between 2009 and 2018, most originated inside Europe, with substantial flows from Russia and the United States; American evangelical activists helped shape Uganda's original anti-homosexuality bill. [48,49,65,66,67](#)

KJ-6 • DEMOCRACIES SUPPLY RHETORICAL COVER**MODERATE CONFIDENCE**

Binary-sex legal definitions adopted in democracies — notably the 2025 U.S. executive order — are cited and emulated by illiberal governments, which use them as evidence that their own far harsher measures are mainstream. The democratic measures differ materially in process and severity (Chapter 7, Chapter 11). [18,20,68](#)

KJ-7 • THE STRATEGY CAN BACKFIRE**MODERATE CONFIDENCE**

Overreach can mobilise broad coalitions in defence of assembly and expression rather than of LGBTQ+ rights alone, as Budapest in 2025–2026 shows; but where public hostility is near-universal, as survey data indicate for Ghana and Uganda, the political cost to rulers is low and the outlook for targeted communities remains grave. [19,26,77](#)

CHRONOLOGY OF THE CRACKDOWN

SELECTED LEGAL AND POLITICAL MILESTONES, 2013–2026

DATE	JURISDICTION	EVENT
2013	Russia	Federal ban on “propaganda of non-traditional sexual relations” to minors — the template later copied across the region. ⁴¹
2020	Russia	Constitutional reform defines marriage to exclude same-sex couples. ³
MAY 2020	Hungary	Article 33 of an omnibus law replaces “sex” in the civil registry with unalterable “sex at birth,” ending legal gender recognition. ^{14,15}
JUN 2021	Hungary	Law LXXIX of 2021, framed as anti-paedophile legislation, restricts content portraying homosexuality or gender reassignment. ²⁴
SEP 2022	Russia	Annexation speech casts Western gender policy as satanic and civilisational threat. ⁹
NOV 2022	Russia	Decree on “traditional spiritual and moral values” names the U.S. and “unfriendly states” as threats; propaganda ban later extended to adults. ^{3,10}
MAY 2023	Uganda	Anti-Homosexuality Act signed; World Bank suspends new public financing in August. ^{45,47}
JUL 2023	Russia	Ban on medical transition and legal gender change; marriages annulled; adoption barred. ^{1,2}
AUG 2023	Kyrgyzstan	Russian-style “propaganda” amendment to child-protection law signed. ^{42,43}
NOV 2023	Russia	Supreme Court designates the “international LGBT movement” extremist in a closed hearing. ⁴
DEC 2023	Hungary	Sovereignty protection law creates a Sovereignty Protection Office with broad investigative powers. ²¹
FEB 2024	Ghana	Parliament unanimously passes anti-LGBTQ bill; it later lapses without presidential assent. ⁵¹
APR 2024	Uganda	Constitutional Court upholds the Act, striking four sections. ^{45,46}
MAY 2024	Georgia	“Foreign influence” law enacted over a presidential veto. ^{34,35}
AUG 2024	Bulgaria · Russia	Bulgaria bans LGBTQ “propaganda” in schools; Russia offers residency to foreigners rejecting “neoliberal” values. ^{11,38}
SEP 2024	Georgia	“Family values” law adopted; trans model Kesaria Abramidze killed the next day. ^{30,32}
NOV 2024	Russia · Georgia · Mali	Russia bans “childfree propaganda”; Georgia freezes EU accession talks; Mali criminalises same-sex relations. ^{12,36,56}

JAN 2025	United States	Executive Order 14168 recognises two immutable sexes in federal policy and documents. ⁶⁸
APR 2025	Hungary · UK	Hungary's 15th constitutional amendment (two sexes; Pride ban); UK Supreme Court reads "sex" in the Equality Act as biological. ^{17,71}
JUN 2025	Hungary · U.S.	Up to 200,000 defy Budapest Pride ban; U.S. Supreme Court upholds Tennessee youth-care law in <i>Skrametti</i> . ^{19,70}
SEP 2025	Burkina Faso · Slovakia	Burkina Faso criminalises same-sex relations for the first time; Slovakia's constitution recognises only two sexes. ^{44,56}
OCT–NOV 2025	Türkiye	Leaked draft would jail conduct "contrary to biological sex"; provisions dropped from the bill submitted in November. ^{59,60}
DEC 2025	Kazakhstan	Ban on LGBT and "paedophilia" propaganda signed into law. ⁴⁰
MAR 2026	Russia	Nightclub owner sentenced to four years for "organising" the banned movement. ⁸
APR 2026	Hungary · EU	Fidesz loses power; CJEU full court rules 2021 law breaches EU values and rights. ^{24,26}
MAY 2026	Ghana	Parliament passes revised anti-LGBTQ bill; awaiting presidential assent at time of writing. ^{50,51}
SEP 2026	Hungary	New government tables bill T/680 to replace the 2021 content restrictions. ²⁸

PART I

THE ARCHITECTURE OF THE MANUFACTURED PANIC

Chapter 1 · The Sovereignty Illusion and the Need for an Enemy

Chapter 2 · Why Trans Women? Visibility, Patriarchy, and Regulated Bodies

CHAPTER ONE

THE SOVEREIGNTY ILLUSION AND THE NEED FOR AN ENEMY

When a regime can no longer deliver, it must instead protect. And to protect, it needs something to protect people from.

EVERY GOVERNMENT RESTS ON SOME MIXTURE OF PERFORMANCE, PROCEDURE AND IDENTITY. Citizens tolerate rulers because life is improving, because the rules for choosing and removing rulers are fair, or because the rulers embody something the citizens believe in — a nation, a faith, a way of life. Democracies lean on procedure. Developmental autocracies lean on performance. When both of those fail at once, identity is what remains, and identity politics requires an outsider against whom the nation can be defined.

Political scientists have described this mechanism for more than a decade. In their 2013 comparative volume *Global Homophobia*, Meredith Weiss and Michael Bosia argued that homophobia should be analysed not merely as private prejudice but as a configuration of state-sponsored policy — “political homophobia” — that states deploy strategically, with its own causes and effects; Bosia’s contribution links such state campaigns specifically to moments of crisis.⁶³ Agnieszka Graff and Elżbieta Korolczuk later showed that the transnational campaigns against “gender ideology” that took shape around 2010 are not simply a continuation of earlier anti-feminist backlash but a new configuration, built on an opportunistic synergy between ultraconservative movements and right-wing populist parties.⁶⁴ This dossier builds on both insights and applies them to the figure that has become the movement’s most visible target: the transgender woman.

1.1 THE AUTOCRAT’S TRILEMMA

How declining economic output, corruption and governance failure push illiberal regimes toward cultural mobilization in place of material performance.

The trilemma can be stated simply. A ruler under strain can (1) deliver material improvement, (2) open the system to genuine competition, or (3) mobilise identity. The first is often beyond reach — because of war, sanctions, debt, commodity shocks or the corruption that hollows out state capacity. The second threatens the ruler’s tenure. The third is cheap, fast and, crucially, fully under the ruler’s control.

The pattern is visible in the record. Ghana’s inflation reached a 21-year high of 50.3 per cent in November 2022, the cedi lost roughly half its value that year, and the government — which had promised a “Ghana beyond aid” — signed a US\$3 billion IMF bailout.⁵⁵ Fourteen months later Parliament unanimously passed one of Africa’s most restrictive anti-LGBTQ bills.⁵¹ In Russia, officials explicitly justified the 2024 ban on “childfree propaganda” as a measure to raise the birth rate and protect the population from what one sponsor described as a hybrid war aimed at reducing it — rhetoric that arrived as the war against Ukraine deepened an existing demographic crisis.^{12,87} And in Hungary, analysts at the Polish Institute of International Affairs observed that in the 2026 campaign Viktor Or-

bán, unable to run convincingly on his government's socio-economic record, presented himself instead as the personal guarantor of the nation's freedom and security; a year earlier his government had moved to ban Budapest Pride in a step Reuters reported was aimed at the coming election.^{80,81}

ASSESSMENT · MODERATE *Where performance legitimacy erodes, gender and sexuality become attractive substitutes because the costs are borne almost entirely by a small, politically weak group, while the benefits — a sense of national purpose, a ready-made enemy, a distraction from material grievances — accrue to the ruler. Timing correlations alone do not prove intent; Chapter 11 weighs the alternative that these laws simply reflect sincere majority belief.*

1.2 SOVEREIGNTY AS ARMOR

The strategic recasting of human rights, self-determination and minority protection as direct threats to national independence and territorial integrity.

The decisive rhetorical move is to relocate a domestic question — how a state treats some of its own citizens — into the domain of national security. Once a rights claim is redefined as foreign interference, the citizen making it becomes a proxy for an external enemy, and the state's response becomes defence rather than repression.

Russia codified this move in November 2022. A presidential decree on state policy for preserving “traditional Russian spiritual and moral values” identified the actions of the United States and other “unfriendly” states as a threat to those values, linked “destructive” ideological influence to the country's demographic situation, and directed that the relationship between the authorities and the media serve as a tool for strengthening traditional values.¹⁰ Hungary followed with an institutional variant: a December 2023 law created a Sovereignty Protection Office able to investigate NGOs and individuals active in public debate whom it suspects of serving foreign interests.^{21,22} When Hungary amended its constitution in April 2025 to recognise only two sexes and permit bans on LGBTQ+ public events, the same package targeted what the government called foreign-funded “political pressure networks” undermining national sovereignty.^{17,82}

The device is portable. Georgia's prime minister defended the 2024 “foreign influence” law as strengthening the country's sovereignty.³⁵ Slovakia's September 2025 constitutional amendment — which recognises only two sexes — also declares that Slovakia retains sovereignty over undefined matters of “national identity,” especially fundamental cultural-ethical questions.⁴⁴ In Ghana, a sponsor of the anti-LGBTQ bill told Reuters the country no longer needed to fear economic sanctions.⁵⁴ In each case, “sovereignty” functions less as a description of independence than as armour: a shield against external scrutiny and domestic appeal alike.

1.3 THE MECHANICS OF THE MORAL PANIC

How state-controlled and state-aligned media transform a tiny, vulnerable demographic into an existential, civilizational threat through manufactured urgency.

The sociologist Stanley Cohen’s classic account of moral panics (1972) described a recurring sequence: a group is singled out as a threat to societal values; the media amplify the threat in stylised, exaggerated terms; moral entrepreneurs — clergy, politicians, commentators — demand action; authorities respond with symbolic measures; and the panic recedes or becomes institutionalised. State-directed panics compress and weaponise this sequence because the same actor controls the amplification and the response.

Russia’s 2023 “extremism” case is a near-perfect specimen. The Ministry of Justice asked the Supreme Court to ban an “international LGBT movement” that, as Russian rights groups pointed out, does not exist as an organisation; the hearing was closed, no defendant was present, and the court granted the request in a single day.^{4,86} The full judgment, when it surfaced, asserted that LGBT activism originated in the United States in the 1960s as part of a “population control policy” and had received the equivalent of €5.2 million in foreign funding since 2020 — while conceding the “movement” had no registration or unified structure.⁵ The legal fiction of a foreign-steered organisation converted a diffuse population into a prosecutable enemy, and within two days security forces raided gay venues in Moscow.⁸⁴

THE PANIC CYCLE — STATE-DIRECTED VARIANT

- **Identify** a small, visible group and attach it to a foreign patron (“the West,” “Brussels,” “NATO,” “foreign-funded networks”).
- **Amplify** through state or allied media using threat-to-children and threat-to-nation frames.
- **Legislate** a symbolic “protection” measure, ideally bundled with an uncontroversial goal (child safety, anti-paedophilia, transparency).
- **Enforce** selectively and visibly to demonstrate resolve.
- **Extend** the instrument to new targets once the precedent is normalised (Chapter 9).

CHAPTER TWO

WHY TRANS WOMEN? VISIBILITY, PATRIARCHY, AND REGULATED BODIES

A trans woman's existence touches three things an insecure state most wants to control: the categories in its registers, the meaning of manhood, and the birth rate.

ANTI-GENDER CAMPAIGNS TARGET MANY GROUPS — FEMINISTS, GAY MEN AND LESBIANS, SEX educators, NGOs. Yet transgender women occupy a distinctive place in the rhetoric. They are invoked in speeches about children, in debates about documents, in warnings about the army and the nation's future. This chapter explains why, analytically, they make such a useful enemy.

2.1 THE THREAT OF SELF-DETERMINATION

Why the assertion of individual gender identity subverts autocratic demands for total state categorization and population control.

Modern states see their populations through registers: birth certificates, identity cards, passports, conscription rolls. The sex marker is among the oldest and most consequential entries, because it governs marriage, military service, pensions, prisons and much else. A legal process that lets a citizen change that marker on the basis of her own identity establishes, in a small but symbolically potent way, that the individual can author a fact the state records about her.

Authoritarian legislation has moved precisely to close that door. Hungary's 2020 amendment replaced "sex" in the civil registry with "sex at birth," defined by primary sex characteristics and chromosomes and declared unalterable once recorded — overriding a unanimous 2018 Constitutional Court ruling that legal gender and name change was a fundamental right.^{14,15} Litigation later won a partial reprieve: in 2021 the Constitutional Court held that applying the ban retroactively to pending applications was unconstitutional.¹⁶ Russia's 2023 law banned changing gender in official documents and refused documents reflecting a transition completed abroad.² Georgia's 2024 law requires that state-issued documents reflect only biological sex.^{30,85} The principle is the same in each: the state, not the person, is the final author of identity.

Iran demonstrates the logic from the opposite direction. The Islamic Republic permits and partly funds gender re-assignment while criminalising homosexuality, and researchers and activists report that gay Iranians have been pressured toward surgery as a way of resolving their "deviance" into an approved binary category.^{62,63} Recognition, there, is not self-determination but re-categorisation on the state's terms — a reminder that the core issue for authoritarian governance is control of the category, not the biology per se.

2.2 PATRIARCHAL ANXIETY AND HYPER-MASCULINE STATE IMAGERY

How trans women unsettle male hierarchies, military-readiness narratives and natalist state policy.

Regimes that ground their legitimacy in a martial and paternal image of the nation — the soldier-father, the mother of many, the sacred family — read a trans woman as something like a defection from the ranks. In the rhetoric she is not merely different but a man who has *abandoned* manhood, and so a living rebuke to the hierarchy the regime embodies. That is why the subject surfaces in incongruous places. In his September 2022 speech announcing the annexation of four Ukrainian regions, Vladimir Putin asked his audience whether they wanted Russian schools to replace mother and father with “parent number one, parent number two” and to offer children gender-reassignment surgery — framing a war of territorial conquest as a defence against Western gender norms.⁹ When Russia’s upper house approved the 2023 transition ban, one senator contrasted Western Pride parades with Russia’s Victory Day celebrations.²

The natalist dimension is explicit. Russia’s 2024 law banning “childfree propaganda” was added to the same administrative article that already punished “propaganda of non-traditional sexual relations” and gender reassignment, and its sponsors framed it as a defence against population decline.^{12,13} Türkiye’s president declared 2025 the “Year of the Family,” a campaign tied to the falling birth rate and accompanied by attacks on what he called LGBT ideology.⁶¹ In this frame, any life outside the reproductive heterosexual household is a demographic leak, and the trans woman — visibly departing from the reproductive role assigned to her at birth — becomes its emblem.

ASSESSMENT · MODERATE *The prominence of trans women in this rhetoric is not proportional to their numbers but to their symbolic utility: they let a regime dramatise the boundary of masculinity, the integrity of the family and the fertility of the nation in a single image. Trans men and non-binary people are affected by the same laws but feature far less in official speech.*

2.3 THE HYPER-VISIBILITY TRAP

How public visibility makes trans women low-cost, high-yield targets for state-sponsored harassment, media distraction and legal restriction.

Visibility is the precondition of rights advocacy — and, under hostile governments, a liability. Trans women who live openly are often easier to identify than gay or lesbian people, and the most visible among them become synecdoches for the whole community. Kesaria Abramidze, a model and influencer killed in Tbilisi in September 2024, was the first person in Georgia to come out publicly as transgender.³² In Ghana, one of the few public voices responding to the bill’s 2025 reintroduction was a Ghanaian trans woman and activist, Va-Bene Elikem Fiatsi.⁵⁴

For a regime, the economics are favourable. Restrictive laws cost almost nothing to pass and enforce selectively; they generate saturating media coverage; they force opponents into a defensive posture on terrain the regime has chosen; and every enforcement action is a demonstration of resolve. In Russia, a woman was jailed for five days after a stranger in a café filmed her rainbow-patterned earrings and posted the video online, and at least one prosecution has concerned the blue-pink-white transgender flag.^{6,7} The penalty is small; the message — that any sign of identity is evidence — is enormous.

PART II

THE AUTOCRAT'S PLAYBOOK: THE DECADENT WEST

Chapter 3 · Constructing the “Western Decadence” Phantom

Chapter 4 · State Media, Legal Warfare, and Disinformation Engines

CHAPTER THREE

CONSTRUCTING THE “WESTERN DECADENCE” PHANTOM

The West of authoritarian rhetoric is not a place. It is a mirror in which the regime sees everything it wishes its own people to fear.

“WESTERN DECADENCE” IS A PHANTOM IN THE PRECISE SENSE: AN APPARITION ASSEMBLED from real fragments — Pride marches, legal-gender-recognition statutes, school curricula, court rulings — re-arranged into a single malevolent will. The phantom does three jobs at once. It explains domestic problems as foreign sabotage; it gives the regime a civilisational mission abroad; and it binds together an international coalition that might otherwise share little.

3.1 THE IMPERIALIST MIRROR

How autocrats position trans existence not as a universal human reality but as a manufactured weapon or cultural virus exported by NATO, the EU or Western agencies.

The mirror inverts imperialism. The regime, often itself engaged in territorial conquest or the suppression of neighbours, recasts itself as the victim of a cultural empire. Putin’s annexation speech of 30 September 2022 is the canonical text: it combined denunciations of Western colonialism with the claim that the West was sliding into satanism and imposing gender ideology on children.⁹ Russian lawmakers who passed the 2023 transition ban described it as protection against “Western anti-family ideology,” with some calling gender transition “pure satanism.”³ Russia’s Supreme Court judgment went further, presenting LGBT activism as an American population-control project.⁵

The trope travels. Kazakhstan’s president, before signing his country’s propaganda ban, said that so-called democratic moral values, including LGBT rights, had for decades been imposed on many countries.⁸³ Türkiye’s president has described LGBT activism as a foreign plot and a threat to society.⁶¹ Graff and Korolczuk devote an entire chapter of their study to this move, titled after one of its most vivid formulations — gender as “Ebola from Brussels” — and analyse how the anti-colonial frame is used and abused by anti-gender actors.⁶⁴ The metaphor is telling: a disease that arrives from outside, infects the young, and can only be stopped by quarantine.

ASSESSMENT · HIGH *The “virus from the West” frame performs a crucial ideological task: it denies that trans people are native to the nation at all. If they are an import, persecuting them is not discrimination against citizens but border control against contagion.*

3.2 MORAL PANIC AS FOREIGN POLICY

Using domestic anti-trans legislation to signal geopolitical alignment, consolidate anti-Western blocs and project ideological strength to the Global South.

Domestic gender law has become an instrument of statecraft. Russia’s 2022 values decree explicitly tasks the state with projecting an international image of Russia as a defender of universal spiritual and moral values.¹⁰ In August 2024 Putin signed a decree offering simplified temporary residence to foreigners who share “traditional Russian spiritual and moral values” and reject what the decree called the “destructive neoliberal” agenda of their home governments, and instructed the Foreign Ministry to draw up a list of offending countries.¹¹ Three months later, Russia barred citizens of countries that legally recognise gender transition from adopting Russian children — a measure its authors noted would effectively exclude citizens of NATO states.¹³

The signalling function is equally clear at the receiving end. When the military juntas of Mali (November 2024) and Burkina Faso (September 2025) criminalised same-sex relations, they did so amid a broader repudiation of Western institutions; within weeks of Burkina Faso’s law, the juntas of Burkina Faso, Mali and Niger jointly announced their withdrawal from the International Criminal Court, calling it an instrument of neo-colonial repression.^{56,58} Georgia’s ruling party paired its “family values” law with a “foreign influence” law and, after a disputed election, froze the country’s EU accession process until the end of 2028.^{30,34,36} Gender law, in each case, travels with a geopolitical message.

3.3 THE “TRADITIONAL VALUES” COALITION

How authoritarian states ally with international religious conservatives and hyper-nationalist movements through shared anti-gender rhetoric.

The coalition is transnational, well funded and — awkwardly for its anti-Western branding — substantially Western. The European Parliamentary Forum for Sexual and Reproductive Rights’ 2021 report *Tip of the Iceberg* traced US\$707.2 million in anti-gender funding in Europe between 2009 and 2018, with annual spending roughly quadrupling over the period.⁶⁵ More than half came from within Europe itself; the report identified about US\$186 million originating from Russia and about US\$81 million from the United States, alongside smaller sums from other countries.^{66,67}

Africa offers the clearest example of the coalition’s Western roots. In March 2009, the American evangelical activist Scott Lively addressed Ugandan lawmakers and officials at a Kampala conference; the legislator who introduced Uganda’s first Anti-Homosexuality Bill attended, and the bill’s original preamble drew in part on Lively’s presentation.^{48,49} Lively, according to the Southern Poverty Law Center, has authored material casting gay people as predators who “recruit” children — the same trope that resurfaced in Uganda’s 2023 Act, which the Constitutional Court described as aimed at stopping such “recruitment.”^{46,48}

INTELLIGENCE NOTE · THE IRONY AT THE CORE

The movement that markets itself as a defence of national tradition against Western contamination is financed and staffed, in significant part, by Western foundations, Western churches and Western activists, alongside Russian money. The “anti-Western” coalition is, in large measure, a coalition **within** the West’s own culture wars, exported to places where the stakes for targeted people are far higher.

CHAPTER FOUR

STATE MEDIA, LEGAL WARFARE, AND DISINFORMATION ENGINES

Rhetoric creates the enemy; law makes the enemy prosecutable; language makes the prosecution feel like protection.

MORAL PANICS FADE UNLESS THEY ARE INSTITUTIONALISED. THE REGIMES STUDIED HERE HAVE built durable machinery to keep the threat alive: statutes that convert speech into offence, registries that convert civil society into suspects, and a vocabulary that converts a gender identity into a species of crime.

4.1 LAW AS A CENSORSHIP TOOL

The evolution of “foreign agent” and anti-LGBTQ+ “propaganda” laws that reclassify human-rights advocacy as treason or espionage.

Two legal families do most of the work. The first is the **propaganda ban**. Russia’s 2013 prohibition on “propaganda of non-traditional sexual relations” to minors was extended to adults in 2022.^{3,41} Its defining feature is vagueness: “propaganda” is undefined, so any positive or neutral depiction can qualify. Kyrgyzstan’s 2023 version copied an article of the Russian law nearly verbatim without defining propaganda, family values or non-traditional relationships.⁴³

The second is the **foreign-agent or sovereignty law**. Georgia’s 2024 Law on Transparency of Foreign Influence requires organisations receiving more than 20 per cent of their funding from abroad to register as bearing the interests of a foreign power; critics warned it may have been driven by Moscow, the EU said it set back Georgia’s path to membership, and Parliament overrode a presidential veto to enact it.^{34,35} Hungary’s 2023 sovereignty law created a standing office to investigate those suspected of serving foreign interests, and the European Commission has taken Hungary to the Court of Justice over it.^{21,22} In Bulgaria, the pro-Russian party that pushed the 2024 school “propaganda” ban called for a Russian-style foreign-agents law one week after Parliament adopted the ban.³⁹

Russia then fused the two families through the “extremism” designation. Once the “international LGBT movement” was declared extremist, ordinary expression became evidence of participation in a banned organisation. By June 2025 Human Rights Watch had counted 101 extremism-related convictions linked to the designation, most of them administrative, and at least 20 people facing criminal charges; investigators had charged staff of two publishing houses with running an extremist organisation for selling LGBT-themed fiction.⁷ In March 2026 a court in Chita sentenced a 23-year-old nightclub owner to four years in a penal colony for allegedly organising the movement’s activities at her venue.⁸

4.2 INFORMATION ECOSYSTEMS

The coordinated use of state media, online platforms and amplification to sustain moral outrage and suppress civic opposition.

In consolidated autocracies, coordination is formal. Russia's values decree instructs that relations between the authorities and the media should serve as a tool for preserving traditional values.¹⁰ Hungary's Sovereignty Protection Office has publicly labelled civil-society and media groups part of a "foreign-financed political pressure network."²³ Transnationally, the anti-gender movement has built its own digital infrastructure; the EPF research identified on-line petition and mobilisation platforms such as CitizenGo among the movement's newer instruments.⁶⁷

The outline of this dossier also calls for examination of bot networks and algorithmic amplification. Here a disciplined distinction is necessary. Coordinated inauthentic behaviour is a well-established feature of state information operations in general, but this dossier did *not* independently verify attribution of specific bot networks to specific anti-trans campaigns in the countries studied, and it does not assert such attribution. The tradecraft box below sets out how an OSINT investigator can test for it.

OSINT TRADecraft · TESTING FOR MANUFACTURED AMPLIFICATION

- **Temporal clustering:** bursts of near-identical posts within minutes of a state-media segment or parliamentary reading.
- **Account forensics:** creation-date spikes, default avatars, recycled bios, posting around the clock from a single time zone.
- **Copy-paste fingerprints:** identical typos, translation artefacts or hashtags across languages and countries.
- **Cross-platform hops:** trace a narrative from fringe channel to state broadcaster to parliamentary speech; date-stamp each hop.
- **Legislative text matching:** compare bills across jurisdictions for verbatim clauses — as rights groups did when they found Kyrgyzstan's law copying Russia's.⁴³
- **Follow the money:** annual reports, charity filings and foundation grants, as in the EPF methodology.⁶⁵

4.3 LANGUAGE WEAPONIZATION

How regime linguists and media handlers conflate transgender identity with criminality to strip targets of public sympathy.

The most effective technique is **bundling**: placing gender identity in the same legal clause as an unquestionably criminal category, so that the association does the persuasive work. The pattern recurs with striking consistency:

- **Kazakhstan (2025)** banned "propaganda of pedophilia and/or non-traditional sexual orientation" in a single provision.^{40,41}
- **Georgia (2024)** barred schools from disseminating information promoting same-sex relations, gender-affirming surgery — or incest — in one list.³¹

- **Hungary (2021)** enacted its restrictions on content depicting homosexuality and gender reassignment inside a law on stricter measures against convicted paedophiles. In April 2026 the EU's highest court found the law stigmatised non-heterosexual and non-cisgender people by presenting them as harmful to minors solely because of who they are.^{24,28}
- **Russia (2023)** moved the entire field into the vocabulary of “extremism,” the legal category used for terrorist and violent organisations.⁴

Alongside bundling runs a vocabulary of contagion and recruitment — “propaganda,” “promotion,” “recruitment,” “ideology” — which implies that gender identity spreads by persuasion and must be quarantined. And at the summit of the hierarchy sits the sacralised assertion of fixed sex, delivered as dogma rather than argument. Ghana's president, pledging in November 2025 to sign the anti-LGBTQ bill, stated that “a person's gender is determined at birth.”⁵²

PART III

COMPARATIVE CASE STUDIES IN REGIME SURVIVAL

Chapter 5 · The Post-Soviet Sphere

Chapter 6 · The Middle East and Africa

Chapter 7 · The Western Populist Echo

CHAPTER FIVE

THE POST-SOVIET SPHERE: “TRADITIONAL VALUES” AS GEOPOLITICAL SHIELD

Russia did not merely persecute its own trans citizens. It turned that persecution into an exportable product.

5.1 THE KREMLIN BLUEPRINT

How Russia made anti-trans rhetoric a pillar of state identity — justifying aggression, suppressing dissent and framing foreign policy as a holy war against Western degeneracy.

RUSSIA’S CAMPAIGN UNFOLDED AS A DELIBERATE RATCHET, EACH STEP NORMALISING THE next. According to Associated Press reporting, it began roughly a decade before 2023, when Putin first made “traditional family values” a governing theme with the support of the Russian Orthodox Church.³ The 2013 propaganda ban followed; the 2020 constitutional reform excluded same-sex marriage; and in 2022 the propaganda ban was extended from minors to adults.^{3,41}

The 2023 transition ban was the point at which trans people became the explicit object of federal law. Approved unanimously by both chambers and signed on 24 July 2023, it prohibits medical interventions aimed at changing a person’s sex (with an exception for congenital conditions), bans changing gender in official documents, allows the annulment of marriages in which a spouse has transitioned — retroactively — and bars people who have transitioned from becoming adoptive or foster parents.^{1,2,3} Four months later came the extremism designation;⁴ two days after that, police raided gay venues in Moscow;⁸⁴ and in January–February 2024 courts issued the first convictions, including five days of detention for a woman whose earrings displayed a rainbow.⁶

STAGE	INSTRUMENT	FUNCTION IN THE BLUEPRINT
1	Propaganda ban (2013 → adults 2022)	Makes visibility itself an offence; establishes vague “propaganda” standard. ^{3,41}
2	Values doctrine (Decree, Nov 2022)	Names the West as the threat; enlists the media; links gender to demography and security. ¹⁰
3	Transition ban (Jul 2023)	Erases legal and medical existence of trans people; reaches into marriage and family. ^{1,2}
4	Extremism designation (Nov 2023)	Converts identity and symbols into membership of a banned organisation; enables criminal charges. ^{4,5}
5	Expansion (2024–2026)	Childfree “propaganda,” adoption bans for NATO-state citizens, charges against publishers and venue owners. ^{7,8,12,13}

The blueprint is fused with the war. The annexation speech of September 2022 framed the seizure of Ukrainian territory partly as a defence against Western gender ideology.⁹ As the war deepened, official rhetoric elevated the soldier-father and the reproductive family as the nation’s highest values; the 2022 values decree lists patriotism and ser-

vice to the Fatherland among Russia’s “traditional spiritual and moral values,” alongside a strong family.^{10,11} Domestic dissent was simultaneously criminalised under the same expanding vocabulary of “extremism” and foreign influence.

ASSESSMENT · HIGH *For the Kremlin, the anti-trans campaign is not a side project but a load-bearing element of its post-2022 legitimacy narrative: it supplies the civilisational stakes that make an expensive war and comprehensive repression intelligible to domestic audiences as defence rather than aggression.*

5.2 REGIONAL MIRRORING

How neighbouring and aligned states adopt Moscow’s legislative templates to signal loyalty and consolidate domestic rule.

The Russian model has proved remarkably portable, with each adopter adapting it to local politics:

KYRGYZSTAN (2023)

President Sadyr Japarov signed amendments in August 2023 declaring information about “non-traditional sexual relationships” harmful to children — in the assessment of Human Rights Watch, effectively criminalising any public discussion of LGBT people. Transgender Europe found that the law copies an article of the Russian law.^{42,43}

GEORGIA (2024)

Georgia is the clearest case of a European Union candidate turned toward Moscow’s model. In May 2024 the ruling Georgian Dream party enacted its “foreign influence” law over the president’s veto and amid some of the largest protests since independence.^{34,35,92} On 17 September 2024 Parliament adopted, with 84 votes, a “family values and protection of minors” package covering marriage, adoption, gender-affirming medical treatment, sex markers on documents, education, information, and public assemblies — and designating 17 May, internationally observed as the day against homophobia and transphobia, as a “Day of Family Sanctity.”^{30,85} The country’s parliamentary election followed on 26 October; after the European Parliament declared the vote neither free nor fair, the government suspended EU accession talks until the end of 2028.^{36,37}

BULGARIA (2024)

Bulgaria shows that mirroring does not require a pro-Kremlin government. The school “propaganda” ban was initiated by the far-right, pro-Russian Vazrazhdane party, but passed with 159 votes because larger mainstream parties joined; President Rumen Radev signed it despite petitions and protests.^{38,39}

KAZAKHSTAN (2025)

On 30 December 2025 President Kassym-Jomart Tokayev signed amendments banning the public dissemination of “propaganda of pedophilia and/or non-traditional sexual orientation” in media and online, punishable by fines or detention — a law widely described as a copy of Russia’s 2013 template.^{40,41} The government insisted that identifying as LGBT was not itself illegal, only its public “promotion” — the same distinction Russian officials continued to draw even as the extremism designation erased it in practice.^{40,84}

THE EU-INTERNAL VARIANT: HUNGARY AND SLOVAKIA

Within the European Union, Hungary built the most complete version of the model — ending legal gender recognition (2020), restricting LGBTQ content (2021), creating a sovereignty office (2023), and amending the constitution to recognise only two sexes and ban Pride (2025).^{14,17,21,24} Slovakia followed in September 2025 with a constitutional amendment recognising only two biologically given sexes and asserting national sovereignty over cultural-ethical questions; it passed with exactly the 90 votes required.⁴⁴

ASSESSMENT · MODERATE *“Mirroring” is driven by two overlapping motives: geopolitical signalling (strongest in Georgia and Kazakhstan) and domestic electoral advantage (strongest in Bulgaria). The textual borrowing is easier to prove than the motive; in several cases both are plainly present.*

CHAPTER SIX

THE MIDDLE EAST AND AFRICA: ANTI-COLONIAL BACKLASH AS SCAPEGOAT

The most powerful argument the regimes possess is borrowed from their victims' own history: the memory of empire.

6.1 THE FALSE BINARY

How autocrats weaponise legitimate anti-colonial sentiment to brand gender diversity and trans rights as “foreign cultural imperialism.”

THE ANTI-COLONIAL FRAME IS PERSUASIVE BECAUSE THE GRIEVANCE IT INVOKES IS REAL. Western powers did impose laws, borders, religions and economic arrangements by force, and Western governments and lenders do still attach conditions to aid. The regimes' sleight of hand is to apply this genuine history backwards — treating the protection of sexual and gender minorities as the colonial imposition, when the historical record frequently shows the reverse.

- **Ghana.** The law criminalising same-sex relations that the new bill would intensify dates from British colonial rule, introduced through Victorian-era criminal legislation.^{50,89}
- **Burkina Faso.** Same-sex activity was legal from independence in 1960; unlike many former British colonies, the country inherited no anti-homosexuality law from France. The first criminalisation in its history came in September 2025 from an unelected transitional assembly.^{57,58}
- **Türkiye.** The Ottoman Empire decriminalised homosexuality in 1858, and same-sex relations have never been illegal in the Turkish Republic — a record that complicates any claim that the current crackdown restores native tradition.⁶¹
- **Iran.** Ayatollah Khomeini's 1987 fatwa held that gender reassignment did not violate Islamic law, and the Islamic Republic has since partially subsidised it.⁶² Whatever one makes of the coercive way the policy has been applied, it is plainly not a Western import.

Graff and Korolczuk name this the “uses and abuses of the anti-colonial frame.”⁶⁴ Its rhetorical power lies in forcing a binary: either one stands with the nation against the former empire, or one stands with the empire against the nation. Local LGBTQ+ people — who are, inconveniently for the frame, citizens of the nation — vanish from the picture. The Ugandan human-rights lawyer Nicholas Opiyo, who petitioned against the 2023 Act, criticised the Constitutional Court for grounding its ruling in public sentiment and asserted moral values rather than in the constitution's protections.⁴⁵

6.2 DISTRACTION FROM STATE FAILURE

How crackdowns on gender minorities coincide with periods of inflation, contested elections and popular unrest.

Timelines are the investigator’s first tool. Laid side by side, the chronologies of several crackdowns and several crises line up closely:

COUNTRY	STRESS INDICATOR	GENDER/SEXUALITY MEASURE
Ghana	Inflation peaks at 50.3% (Nov 2022); cedi loses about half its value; US\$3bn IMF bailout agreed. ⁵⁵	Bill passed unanimously Feb 2024; lapses; passed again 29 May 2026; presidential assent pending at time of writing. ^{50,51}
Uganda	Heavy reliance on external development finance: World Bank IDA financing to Uganda totalled US\$5.4bn by end-2022. ⁹¹	Anti-Homosexuality Act (May 2023), including death penalty for “aggravated homosexuality”; World Bank suspends new lending (Aug 2023). ^{45,47}
Georgia	Mass protests over foreign-influence law (spring 2024); contested election (26 Oct 2024). ^{35,37}	“Family values” law adopted 17 Sept 2024, weeks before the vote. ³⁰
Hungary	Strongest electoral challenge to the ruling party since 2010. ^{26,81}	Pride ban (Mar 2025) and 15th amendment (Apr 2025), targeted at the 2026 election. ^{17,81}
Burkina Faso • Mali	Military rule following coups; break with regional and international institutions. ⁵⁸	Criminalisation of same-sex relations (Mali Nov 2024; Burkina Faso Sept 2025). ⁵⁶

The Ghanaian case also shows how the strategy interacts with the very external pressure it denounces. In 2024 Ghana’s finance ministry warned that the bill could jeopardise US\$3.8 billion in World Bank financing and derail the IMF package; then-President Akufo-Addo withheld assent pending litigation, and the bill lapsed when his term ended. ⁵⁴ His successor, John Mahama, has repeatedly pledged to sign, aligning himself publicly with the Christian Council of Ghana; Parliament re-passed a revised bill on 29 May 2026 that retains the core penalties — up to three years’ imprisonment for same-sex relations and three to five years for the promotion, sponsorship or support of LGBTQ activities — with new exemptions for legal, media and health professionals. ^{50,51,52} An October 2025 summary of the reintroduced bill by Citi Newsroom reported that it would also prohibit transgender health care and dissolve LGBTQ organisations. ⁵³

ASSESSMENT • MODERATE *The timing evidence supports the claim that crackdowns are used to change the subject and rally support in moments of stress. It does not support a claim that they are only distraction. In Ghana and Uganda, survey data show near-universal public rejection of homosexuality, and the Ghanaian bill has been sponsored across both main parties and passed by two successive parliaments, with the current president pledging to sign it. ^{51,52,54,77} Distraction and conviction are complements, not alternatives: rulers choose this issue precisely because it is popular.*

CHAPTER SEVEN

THE WESTERN POPULIST ECHO: THE CROSS-BORDER FEEDBACK LOOP

The regimes say they are resisting the West. Increasingly, they quote it.

THIS CHAPTER REQUIRES PARTICULAR CARE. THE UNITED STATES, THE UNITED KINGDOM AND other democracies have adopted or upheld measures restricting legal and medical transition, and supporters of those measures — including many who reject authoritarianism entirely — argue that they protect children, women’s sex-based rights and clinical standards. Those measures emerged through elections, legislatures, independent courts and evidence reviews, and none criminalises identity or expression in the manner of the laws in Chapters 5 and 6. The claim made here is narrower: that vocabulary and legal techniques now circulate in both directions, and that authoritarian governments exploit Western measures as proof that their own are mainstream.

7.1 ILLIBERAL CONVERGENCE

How illiberal actors in democratic states and authoritarian governments converge on shared rhetoric and policy design regarding gender identity.

On 20 January 2025, President Trump signed Executive Order 14168, “Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government,” establishing that federal policy recognises two sexes defined as an immutable biological classification and directing that passports and other federal documents reflect that classification.⁶⁸ After the Supreme Court stayed a lower-court injunction in November 2025, the State Department confirmed it issues passports only with a sex marker matching sex at birth.⁶⁹ In June 2025 the Supreme Court upheld, by six votes to three under rational-basis review, Tennessee’s ban on certain gender-affirming treatments for minors; major U.S. medical associations publicly expressed disappointment.^{70,78}

The convergence shows most clearly in Hungary. Reporting on Hungary’s April 2025 constitutional amendment, Radio Free Europe noted that it came three months after Trump’s executive order recognising only two genders; Orbán himself said he had been emboldened by the American administration’s anti-diversity push.^{18,20} The phrase “gender ideology” at the heart of the executive order is the organising term of the transnational anti-gender mobilisation studied by Graff and Korolczuk.⁶⁴

The United Kingdom illustrates the distinction this dossier insists on. In April 2025 its Supreme Court ruled unanimously that “woman” and “sex” in the Equality Act 2010 refer to biological sex — a decision about the meaning of a statute, welcomed by the UK government and criticised by some legal scholars as unworkable in practice.^{71,72} The 2024 Cass Review, commissioned by NHS England, concluded that the evidence base for puberty suppression was weak; its recommendations were endorsed by both major parties, while some international medical organisa-

tions criticised it.⁷³ These are contested domestic debates conducted under the rule of law. They are nonetheless available to authoritarian propagandists, who strip away process and nuance and present them as Western confessions that “gender ideology” has failed.

ASSESSMENT · MODERATE *The most important effect of Western restrictive measures on authoritarian states is not policy transfer but legitimization: they weaken the credibility of Western diplomatic criticism and give regimes a ready answer — “you are doing it too” — even when the comparison collapses under scrutiny.*

7.2 TRANSNATIONAL DISINFORMATION NETWORKS

How anti-trans narratives move between Eastern autocracies, Western populist media and online subcultures.

The network has identifiable nodes. Funders: the European, Russian and American donors traced by EPF.^{65,66,67} Missionaries: activists like Scott Lively, whose Ugandan campaign is documented in Chapter 3.^{48,49} Platforms: petition and mobilisation sites such as CitizenGo.⁶⁷ State nodes: Russia’s residency programme for foreigners fleeing “neoliberal” values, and its adoption ban aimed at NATO-state citizens, which advertise Moscow as a refuge for Western conservatives.^{11,13} Political nodes: the government of Viktor Orbán, whose April 2026 electoral defeat news agencies described as a setback for its allies in both Moscow and the Trump White House.²⁷

Narratives move along these nodes in recognisable form. Sex defined as fixed and “biological” now recurs as a legal formula in an American executive order, the Hungarian and Slovak constitutions and a Turkish draft penal provision; the “recruitment” trope runs from American evangelical pamphlets to Ugandan law; the claim that gender diversity is a Western imposition appears in Russian, Kazakh and Turkish presidential rhetoric alike.^{17,44,46,48,59,61,68,83} The loop is self-reinforcing: each node cites the others as independent confirmation.

PART IV

THE HUMAN AND SYSTEMIC COSTS

Chapter 8 · Collateral Damage: Trans Women on the Frontlines of State Power

Chapter 9 · The Contagion of Authoritarian Control

CHAPTER EIGHT

COLLATERAL DAMAGE: TRANS WOMEN ON THE FRONTLINES OF STATE POWER

Behind every statute in this dossier there are people who lost their documents, their doctors, their marriages, their liberty, their country — or their lives.

8.1 STATE-SANCTIONED VIOLENCE

The direct human toll: coerced and denied medical care, arbitrary detention, exile, and vigilante violence encouraged by state rhetoric.

MEDICINE AS A WEAPON

STATE VIOLENCE AGAINST TRANS PEOPLE OFTEN ARRIVES IN CLINICAL FORM — EITHER BY FORCING medical intervention or by forbidding it. Russia's 2023 law prohibits surgical and hormonal treatment for the purpose of changing sex except for congenital conditions, cutting off care for those already in transition.² In Iran the inverse occurs: activists and Iranians interviewed by journalists describe pressure from authorities on gay people to undergo state-subsidised surgery, which activists believe the state funds partly to erase homosexuality.⁶² Ghana's reintroduced bill, as summarised by Citi Newsroom in October 2025, would ban transgender health care.⁵³ In Türkiye, an October 2025 draft would have imprisoned medical professionals for providing gender-affirming care outside new statutory limits; the provisions were dropped from the bill submitted to Parliament in November 2025 after public protest, but pro-government media reported in 2026 that they would return as standalone legislation.^{59,60,61}

DETENTION AND PROSECUTION

In Russia, the extremism designation produced at least 101 convictions within eighteen months, most for displaying “symbols” such as rainbow flags; at least 20 people faced criminal charges, two were sentenced to prison, and one of the accused died in pretrial detention, according to Human Rights Watch.⁷ By the end of 2025 at least 23 criminal cases had been opened, and in March 2026 a 23-year-old club owner received four years in a penal colony.⁸ In Uganda, the 2023 Act prescribes life imprisonment for consensual same-sex relations and death for “aggravated homosexuality.”^{45,47}

EXILE

Repression drives emigration. Immediately after Russia's extremism ruling, rights organisations reported a sharp rise in requests for help from LGBT people seeking to leave the country, and Human Rights Watch urged other governments to offer safe haven to those fleeing prosecution.^{4,86} On the day of the ruling, Delo LGBT+, a legal collective formed in 2022 to defend LGBT people pro bono, announced its dissolution.⁶

VIGILANTE VIOLENCE AND THE PERMISSION STRUCTURE

State rhetoric does not need to order violence to enable it. Russia's earring case began not with the police but with a private citizen who confronted a woman, filmed her and posted the video online — after which the state stepped in to punish *her*.⁶ The law deputised the bystander.

CASE FILE · KESARIA ABRAMIDZE · TBILISI · SEPTEMBER 2024

Kesaria Abramidze, a model, actress and influencer, was the first person in Georgia to come out publicly as transgender. She was stabbed to death in her Tbilisi apartment on 18 September 2024 — the day after Parliament adopted the “family values” law. A man she knew was arrested; police reported that the killing followed an argument. Earlier that year she had temporarily fled abroad after attacks by a former partner.^{32,33}

Analytic note. A senior German parliamentarian publicly linked the killing to the climate created by the law.³³ The evidence available to this dossier does not establish that the law motivated the killer. What the case does show is the environment the law created: the state had just declared the existence of people like her a threat to the nation's children, and a public figure who embodied that existence was left exposed.

Globally, Transgender Europe's Trans Murder Monitoring recorded 281 trans and gender-diverse people reported murdered between October 2024 and September 2025, and 5,322 since monitoring began in 2009; it found that killings of trans activists and movement leaders had doubled over two years, and warned that misgendering and the absence of government data mean the true toll is likely far higher.⁷⁴

8.2 THE EROSION OF PRIVATE SPACE

How targeting trans citizens extends the state's reach into medical records, family life, public assembly and personal data — for everyone.

To enforce a law against an identity, the state must be able to see that identity. Every anti-trans measure therefore contains a surveillance requirement, and each one enlarges the state's field of vision for all citizens:

- **Family law.** Russia's 2023 law allows marriages to be annulled — retroactively — where a spouse transitioned, and bars such couples from adopting; a 2024 amendment bars adoption by citizens of any country that recognises transition.^{2,13} The state now audits the medical histories of married couples and prospective parents.
- **Biometric surveillance of assembly.** Hungary's 2025 Pride ban authorised police to use facial-recognition technology to identify participants in banned events, with fines of up to 200,000 forints; a civil-liberties lawyer noted that this widened the technology far beyond its earlier criminal-investigation uses.¹⁷
- **Data protection.** The Court of Justice found that Hungary's 2021 law also breached the GDPR because it failed to define with sufficient precision who could access criminal-record data and on what grounds.²⁵
- **Investigative powers.** Hungary's Sovereignty Protection Office was given wide-ranging tools to investigate individuals, informal groups and legal entities inside and outside the country, in pursuit of concepts that, according to the Hungarian Helsinki Committee and Amnesty International, elude legal definition.²²

- **Speech about reproduction.** The UN Special Rapporteur on Russia has observed that the 2024 “childfree” law restricts discussion of contraception, abortion, infertility and voluntary childlessness.⁸⁷
- **Identity documents.** Where sex markers are fixed at birth, every identity check, border crossing and medical record becomes a point at which a trans person can be outed. Even in the United States, the 2025 passport policy means trans citizens now carry documents that contradict their presentation.⁶⁹

ASSESSMENT · HIGH *Anti-trans measures are, structurally, surveillance measures. They require the state to inspect bodies, records, relationships, images and speech in order to enforce a category — and the infrastructure built for that purpose does not stay confined to trans people.*

CHAPTER NINE

THE CONTAGION OF AUTHORITARIAN CONTROL

The real contagion in this story is not gender identity. It is the legal machinery built to suppress it.

9.1 FIRST THEY CAME FOR THE MARGIN

How legal frameworks first built to strip trans women of rights are extended to journalists, opposition and civil society at large.

PASTOR MARTIN NIEMÖLLER’S FAMOUS CONFESSION ABOUT THE 1930S — THAT HE DID NOT speak out when they came for others, until there was no one left to speak for him — is often quoted as a moral lesson. In the cases documented here it is also an empirical description of legislative sequencing. The instruments built against the smallest minority are rarely retired; they are repurposed.

INSTRUMENT	ORIGINAL TARGET	DOCUMENTED EXTENSION
Russia, Code of Administrative Offences art. 6.21	“Propaganda” of non-traditional relations and gender reassignment	Extended in 2024 to “propaganda” of choosing not to have children, with fines for individuals, officials and organisations. ^{12,13}
Russia, “international LGBT movement” extremism designation	LGBT activists and symbols	Criminal charges against staff of publishing houses for selling fiction; four-year sentence for a nightclub owner. ^{7,8}
Hungary, assembly ban & 15th amendment	Budapest Pride	Opposition politicians warned the fines regime could be used to suppress future protests, including over electoral fraud. ⁷⁹
Hungary, Sovereignty Protection Office	“Foreign-funded” political influence	2025 “transparency of public life” bill would let the government defund and dissolve organisations it deems a threat to sovereignty. ²³
Georgia, family-values + foreign-influence laws	LGBTQ+ people; foreign-funded NGOs and media	Followed by a disputed election, suspension of EU accession talks, and mass detentions of protesters. ^{36,37,88}
Bulgaria, school “propaganda” ban	LGBTQ+ content in schools	The sponsoring party immediately demanded a Russian-style foreign-agents law. ³⁹

The pattern is consistent with the analytic model in Chapter 1. A regime first establishes, against a group with few defenders, the principle that certain speech and association can be banned because it serves a foreign enemy. Once the principle is accepted, extending it is a matter of administrative convenience. Hungary’s 2025 Pride ban is especially instructive: it was justified by “child protection,” yet it was framed in law as a restriction on the constitutional right of assembly — a right every protester shares.^{17,79}

9.2 THE DEGRADATION OF INTERNATIONAL NORMS

How the weaponisation of “sovereignty” weakens human-rights institutions, asylum frameworks and diplomatic accountability.

At the international level, the same “sovereignty” claim is used to hollow out the institutions that might hold governments to account:

- **Exit and delegitimation.** The juntas of Burkina Faso, Mali and Niger withdrew from the International Criminal Court in September 2025, describing it as an instrument of neo-colonial repression — weeks after Burkina Faso criminalised same-sex relations, and while ICC investigations and victims’ complaints concerning abuses in the region were pending.⁵⁸
- **Constitutional firewalls.** Slovakia’s 2025 amendment asserts national sovereignty over undefined “cultural-ethical” questions, a move critics warned may breach the country’s international obligations.⁴⁴ Hungary’s sovereignty law rests on a comparable doctrine of national sovereignty and “constitutional identity” developed by its Constitutional Court.²²
- **Inverted asylum.** Russia’s 2024 residency decree repackages the concept of humanitarian protection to offer refuge to Westerners fleeing liberal values, even as Russians fleeing extremism prosecutions seek protection abroad.^{4,11}
- **Majoritarian jurisprudence.** Uganda’s Constitutional Court, in upholding the 2023 Act, was criticised by petitioners for relying on public sentiment and asserted moral values rather than the constitution’s rights guarantees.⁴⁵

Yet the institutions are not powerless. In April 2026 the Court of Justice of the European Union, sitting as a full court, held that Hungary’s 2021 law violated internal-market rules, the EU Charter of Fundamental Rights, the GDPR and the founding values set out in Article 2 of the Treaty on European Union.^{24,25} In September 2026 Hungary’s new government tabled legislation to replace the offending content restrictions with a general child-protection standard.²⁸ Norms degrade when they are not enforced; they can recover when they are.

PART V

DISMANTLING THE MIRAGE

Chapter 10 · Deconstructing the Anti-Western Myth
Chapter 11 · Competing Explanations and Analytic Caveats

CHAPTER TEN

DECONSTRUCTING THE ANTI-WESTERN MYTH

A mirage is defeated not by arguing with it, but by walking up to it until it disappears.

10.1 UNCOUPLING HUMAN RIGHTS FROM GEOPOLITICS

Countering the “Western import” narrative by elevating local, historical and indigenous contexts.

THE REGIMES’ STRONGEST CARD IS THE CLAIM THAT TRANS AND LGBTQ+ RIGHTS ARE A FOREIGN product sold by foreign powers. The most effective response is therefore not more foreign pressure delivered in the same packaging, but evidence — drawn from each country’s own law, history, courts and citizens — that the claim is false.

RECOMMENDATIONS

- **Lead with local voices.** Ugandan petitioners such as Nicholas Opiyo, Ghanaian activists such as Va-Bene Elikem Fiatsi, and Russian rights groups that challenged the extremism case are more credible to domestic audiences than any embassy statement. ^{45,54,86}
- **Use the regimes’ own legal history.** Ghana’s criminal ban is a British colonial inheritance; Burkina Faso had none for 65 years after independence; the Ottoman state decriminalised homosexuality in 1858; Iran’s clerical establishment recognised gender transition in 1987. ^{57,61,62,89} Each fact turns the anti-colonial frame back on its users.
- **Argue from domestic constitutions.** Hungary’s own Constitutional Court held in 2018 that legal gender change was a fundamental right; Uganda’s Constitutional Court struck four sections of the 2023 Act for violating rights to health, privacy and religion. ^{15,46} Domestic law is a more resilient foundation than external conditionality.
- **Use conditionality sparingly and transparently.** Aid suspensions such as the World Bank’s 2023 decision on Uganda can protect people from complicity in discrimination, but they also hand regimes the narrative of neo-colonial blackmail. Where used, they should be targeted, explained in local terms, and paired with direct support to affected communities. ^{47,54}

10.2 STRATEGIC COUNTER-MESSAGING

Exposing the hypocrisy of elites who denounce “Western moral decay” while relying on Western money, Western jurisdictions and Western allies.

The regimes’ message has an internal contradiction that investigators can expose with documentary evidence: their elites denounce the West’s morals while depending on its financial system. The 2021 Pandora Papers investigation, based on nearly 12 million leaked documents from offshore service providers, linked associates of Vladimir Putin to secret assets in Monaco and documented how the family and associates of Azerbaijan’s President Ilham Aliyev held

London property worth roughly US\$700 million through offshore companies — including buildings in Mayfair owned in the name of the president’s 11-year-old son.^{75,76} The Kremlin dismissed the revelations as largely unsubstantiated claims.⁷⁶

The same contradiction runs through the anti-gender coalition itself, whose “anti-Western” campaigns are financed in large part by European and American foundations alongside Russian donors (Chapter 3).^{65,66,67} Counter-messaging that simply asks *who pays, and where do they keep their money?* reframes the debate from culture to corruption — terrain on which regimes are far weaker.

CASE STUDY · HOW A BAN BECAME AN OWN GOAL — BUDAPEST, 2025–2026

In early 2025 Orbán told Pride organisers not to bother preparing; his government then banned the march by law and constitutional amendment.^{17,81} On 28 June 2025, organisers estimated that 180,000 to 200,000 people marched — by far the largest Pride in Hungarian history — after Budapest’s mayor re-designated it as a municipal event; opposition leader Péter Magyar called the ban a huge own goal.^{19,79} Ten months later Magyar’s Tisza party won a two-thirds parliamentary majority with record turnout, ending sixteen years of Fidesz government.^{26,27} In May 2026 Budapest police stated they had found no grounds to prohibit that year’s Pride.²⁹

Lesson and limit. The ban mobilised people who were defending freedom of assembly as much as LGBTQ+ rights, and Magyar deliberately avoided LGBTQ+ issues in his campaign; at the time of Pride 2026 his government had yet to restore rights, though it has since tabled legislation responding to the EU court ruling.^{28,90} Overreach can backfire — but the backlash may protect general liberties before it protects the minority that was first targeted.

10.3 BUILDING RESILIENT COMMUNITIES

International solidarity, digital protection and legal defence for communities operating under illiberal regimes.

DIGITAL PROTECTION

- Assume that images from public events may be processed by facial recognition, as Hungary’s 2025 law expressly allowed; minimise identifiable faces in published photos and strip metadata.¹⁷
- Recognise that bystanders can become informants: Russia’s first “extremism” conviction began with a stranger’s video.⁶ Compartmentalise identities across platforms, use end-to-end encrypted messaging with disappearing messages, and review device-seizure risk before travel.
- Treat symbols as evidence where the law does: rainbow and trans flags have grounded prosecutions in Russia.⁷

LEGAL DEFENCE

- Fund legal collectives with exit plans and cross-border redundancy; Delo LGBTQ+ dissolved on the day of Russia’s extremism ruling.⁶
- Pursue regional and international litigation where it is available. The CJEU’s April 2026 judgment shows that supranational courts can deliver binding results, and that domestic reform can follow.^{24,28}

- Document violations rigorously and early: Human Rights Watch compiled its conviction counts by systematically archiving reports from rights groups and independent media, and TGEU now publishes its murder monitoring on an open human-rights database platform.^{7,74}

SOLIDARITY AND SAFE HAVEN

- Create realistic asylum and relocation pathways for those facing prosecution, as Human Rights Watch urged after the Russian ruling.⁴
- Build coalitions beyond LGBTQ+ organisations. Because the instruments spread — to child-free citizens, publishers, protesters, NGOs and journalists — the constituency for repeal is far larger than the minority first targeted (Chapter 9).
- Follow the money on the opposing side, publicly and accurately, as EPF did; transparency is a defensive weapon available to every investigator.⁶⁵

CHAPTER ELEVEN

COMPETING EXPLANATIONS AND ANALYTIC CAVEATS

A dossier that only collects confirming evidence is propaganda with footnotes. This chapter states the strongest case against its own conclusions.

STRUCTURED ANALYTIC PRACTICE REQUIRES TESTING A THESIS AGAINST ITS RIVALS. THE FOLLOWING counter-arguments are made in good faith by scholars, officials, religious leaders and many ordinary citizens. Each is stated as its proponents would state it, followed by how this dossier weighs it.

11.1 “THESE LAWS EXPRESS SINCERE MAJORITY VALUES, NOT CYNICAL MANIPULATION.”

The case. Survey data show very high public rejection of homosexuality in several of the countries studied: in Pew Research Center’s 2013 global survey, 96 per cent of respondents in Ghana and Uganda and 74 per cent in Russia said society should not accept it.⁷⁷ Ghana’s bill has been sponsored by legislators of both major parties.⁵⁴ On this view, rulers are following their citizens, not manufacturing panic.

Weighing it. This is the strongest counter-argument and it materially qualifies the thesis. The dossier’s claim is not that hostility is invented from nothing but that regimes choose, time, amplify and institutionalise it — and then extend the resulting tools to other targets. Public opinion data are also older than the most recent laws and do not measure attitudes toward trans people specifically. Popularity and instrumental use are compatible; often the issue is chosen *because* it is popular.

11.2 “WESTERN PRESSURE IS REAL, AND RESISTANCE TO IT IS LEGITIMATE SOVEREIGNTY.”

The case. The World Bank did suspend new lending to Uganda; Ghana’s finance ministry did warn of billions in lost financing; Western governments do condition aid and trade.^{47,54} To many citizens of formerly colonised states, external pressure on domestic moral law looks like a continuation of empire.

Weighing it. The grievance is legitimate and the dossier treats it as such (Chapter 6). But the legitimacy of resisting external pressure does not establish the legitimacy of imprisoning citizens, and the historical record shows the criminal laws themselves were often colonial imports. The policy implication — that conditionality can backfire — is reflected in the recommendations of Chapter 10.

11.3 “DEMOCRATIC RESTRICTIONS ON YOUTH MEDICAL CARE AND SEX-BASED SPACES ARE NOT AUTHORITARIAN.”

The case. The Cass Review found the evidence base for puberty suppression weak; the UK Supreme Court’s ruling interpreted an Act of Parliament; the U.S. Supreme Court applied established constitutional doctrine; supporters say these measures protect children and women’s sex-based rights. ^{70,71,73}

Weighing it. The dossier agrees that these measures differ in kind from criminalisation, extremism designations and assembly bans, and it does not equate them (Chapter 7). These debates involve contested empirical questions on which major medical bodies themselves disagree. ^{73,78} The narrower claim maintained here is that authoritarian governments exploit such measures rhetorically, and that shared legal formulas — sex as fixed and biological — travel across regime types.

11.4 “THE ‘ANTI-WESTERN’ LABEL OBSCURES THE MOVEMENT’S WESTERN ROOTS.”

The case. If much of the funding and activism is European and American, calling the phenomenon authoritarian or non-Western is itself misleading. ^{48,66}

Weighing it. Accepted, and incorporated: the dossier’s position is that “anti-Western” is the regimes’ *branding*, not an accurate description of the coalition — which is a transnational alliance including Western actors (Chapter 3).

11.5 CAUSATION AND VIOLENCE

Linking specific violent acts to specific laws is inferential. In the Abramidze case, police reported an argument with a man she knew; the dossier therefore treats the case as evidence of a hostile environment rather than of a law-motivated killing. ³³ Global murder data are acknowledged by their compilers to be incomplete and skewed by misgendering and underreporting. ⁷⁴

11.6 COLLECTION LIMITS

This is an English-language open-source product. It relied on translated reporting for Russian, Georgian, Hungarian, Kazakh, Turkish and Ghanaian sources, did not independently verify bot-network attribution (Chapter 4), and reflects information available on 24 October 2026. At that date Ghana’s 2026 bill was reported as awaiting presidential assent, and Türkiye’s dropped provisions were reported as likely to return; both should be re-checked before citation. ^{50,61}

CONCLUSION: THE MIRAGE AND THE REAL THING

WHAT SOVEREIGNTY ACTUALLY REQUIRES

SOVEREIGNTY, IN ITS OLDEST AND MOST SERIOUS SENSE, IS A PEOPLE'S CAPACITY TO GOVERN itself. A state that must manufacture an internal enemy out of a small minority of its own citizens in order to feel independent has already conceded something important about its strength. The trans woman of authoritarian rhetoric — a foreign agent, a contagion, a recruiter of children, a demographic saboteur — does not exist. What exists is a citizen whose documents can be voided, whose doctor can be prosecuted, whose marriage can be annulled, whose earrings can be evidence, whose assembly can be banned and whose murder can be shrugged off.

The evidence assembled here supports three conclusions. First, the panic is engineered: across very different states, governments have used the same sequence of rhetoric, bundling, legislation and selective enforcement, frequently copying one another's texts. Second, the stakes extend far beyond the target: the instruments built against trans women have been turned against child-free citizens, publishers, protesters, NGOs and journalists, and against the international institutions that might restrain them. Third, the mirage can be dispelled: through local evidence, domestic constitutions, rigorous documentation, international courts and — as Budapest showed — through citizens who recognise that a ban on one group's assembly is a ban in waiting on their own.

The real defence of sovereignty is not the persecution of a minority in the name of the nation. It is the protection of every citizen's right to tell the state who they are, to speak, to gather and to live — the very freedoms these regimes most fear.



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