Explanations of Participants in Criminal Procedure

N. V. Azarenok*

Department of Criminal Procedure, Ural State Law University, 620137 Yekaterinburg, Russia
Corresponding author. Email: Azarenok_96@mail.ru

ABSTRACT
The article discusses some issues related to the usage of the concept of explanation in criminal procedure. It is noted that it was still used in the Charter of Criminal Procedure of 1864. In the current Code of Criminal Procedure of the Russian Federation, it is also used to regulate both the status of a participant as well as testimonies and at various stages of criminal procedure. This approach indicates the lack of a unified position on the definition of explanation. The positions of scientists regarding the studied category are considered. The lack of unity among them in determining the legal nature of this phenomenon is stated. A formal analysis of the criminal procedural legislation of individual countries regarding the usage of the term explanation is carried out. Based on the research, individual problems are identified and solutions are proposed.
Keywords: *explanations, testimonies, participants in criminal procedure, suspected, accused*

1. INTRODUCTION

The term “explanation” was still used in the Charter of criminal proceedings of 1864 (hereinafter the Charter – approximated by the author) [1]. So, according to Art. 401 of the Charter, the accused who was delivered had the right to give the police an explanation and demand that it be recorded in protocol. Moreover, if from the explanation of the accused it turns out that he was detained by mistake or misunderstanding, the police must immediately release him (Article 402 of the Charter). Explanations were givin by the prosecutor, private prosecutor, defendant and his defense counsel in a judicial process (Clause 4 of Article 630 of the Charter).

The word “explanations” is used in the text of the Code of Criminal Procedure of the Russian Federation 20 times in various situations. For example, giving explanations concerns the rights of such participants in criminal proceedings as a civil plaintiff (paragraph 3.5, part 4, article 44 of the Code of Criminal Procedure), a civil defendant (paragraph 3 part 2 of article 54 of the Code of Criminal Procedure), a suspect (p. 2.6 ch. 4, article 46 of the Code of Criminal Procedure) and the accused (p. 6, ch. 4, article 47 of the Code of Criminal Procedure). The explanations are given during consideration of the application to challenge the judge (part 2 of article 65 of the Code of Criminal Procedure). This definition refers to the verification action when considering a crime report (part 1 of article 144 of the Code of Criminal Procedure). Explanations are also used in investigative actions (for example, a person who refuses to sign the protocol should be given the opportunity to explain the reasons for the refusal, which is recorded in this protocol - part 2 of article 167 of the Code of Criminal Procedure of the Russian Federation; if the identifying person indicated one of the persons presented to him or one of the objects, the identifier is invited to explain by what signs or features he recognized the person or object - part 7 of article 193 of the Code of Criminal Procedure of the Russian Federation).

And finally, explanations are used in the execution of the sentence. According to Art. 399 of the Code of Criminal Procedure of the Russian Federation - when a convicted person, a victim, one’s legal representative participate in the court hearing, they have the right ... to give explanations (Part 3). The court hearing begins with the report of the representative of the institution or body that made the submission or with the applicant’s explanation (Part 7).

It follows from the foregoing that the explanations apply when regulating both the status of a particular participant along with testimonies and at various stages of criminal proceedings. This approach does not allow us to understand the meaning in which this term is used by the legislator.

2. MATERIALS AND METHODS

There is no unity in this issue among the processionalists. Many scientists traditionally consider explanations as a verification action carried out at the stage of initiating a criminal case [2, 168-172], and as a result, as possible evidence for it [3, 36-38].

There are also studies in which this definition is compared with such an adjacent category as “evidence”. This was written back in 1955 by Soviet scientist R.D. Rakhunov, in whose opinion "the legislator does not distinguish between testimonies and explanations as different from one another [4, 158]. Due to the opinion of our contemporaries, nothing has changed during this time. A.V. Pobedkin writes in his doctoral dissertation that the words “Haphazardly and not taking into account any methodological guidelines,” are used, in our opinion, by the legislator, defining “testimony” and “explanation” [5, 103]. He emphasized that "it is inappropriate to abandon

the definition of explanation, as some authors suggest" [6, 11]. L.D. Kokorev sees the difference between testimony and explanation - testimony is information about facts, explanation is the accused's attitude to the prosecution, his conclusions and assessments [7, 183]. Arguing the same position Ya.O. Motovilovker believes that it is reasonable to cover the general information contained in the testimony of the accused and the witness with the same term "testimony", bearing in mind the fact that the testimony of the witness cannot contain outputs, conclusions, etc. [8, 8]. M.S. Strogovich has another position. In his mind "... the accused's testimony is something the accused reports during interrogation, the accused's explanations are something the accused reports and declares outside the interrogation" [9, 205].

Nowdays the term "explanations" is used in the legislation and theory of criminal procedure in general in three meanings:

1) as a verification action carried out at the stage of initiation of a criminal case and as its material result;

2) as an opinion of the participant in criminal procedure during a particular procedural action, including testifying;

3) as a position of a participant in criminal procedure at the stage of execution of the sentence.

Researching the criminal procedural legislation of the countries of the former USSR shows that explanations are used. As for a suspect, accused, acquitted, convicted person the Code of Criminal Procedure of Ukraine provides the right to defense, which consists in giving him the opportunity to provide oral or written explanations (part 1 of article 20) [10]. The same is stated in the articles providing for the rights of the suspect, the accused (Article 42), the victim (Article 56), the translator (Article 68), the expert (Article 69) and the specialist (Article 71). Explanations may be used in proving (Articles 87, 95, 97, 105), as well as when considering petition for the application of a preventive measure (Article 193).

Explanations are used in the Code of Criminal Procedure of the Republic of Tajikistan [11]. According to Part 4 of Art. 46, the suspect has the right to give or not to give explanations or testimonies and to be informed about this right before interrogation. In a criminal case submitted to the court, when applications and petitions are being resolved, the judge has the right to call the person or representative of the organization, who filed the petition, for explanation (part 2 of article 262). The explanations apply when considering the case by the court of cassation. According to part 3 of article 369 convicted or acquitted, their llegal councils and legal representatives, civil plaintiff and civil defendant or their representatives, if they participate in the hearings, give explanations. After giving explanations, the court hears the opinion of the prosecutor and leaves for the deliberation room to make a cassation resolution.

Explanations are used in the Code of Criminal Procedure of the Republic of Kazakhstan. Part 3 of Art. 120 is indicated that the documents may contain information recorded both in writing and in another form [12]. Documents, including explanations, are acts of inventories, audits, certificates, acts of tax audits, opinions of tax authorities, as well as materials containing computer information, photographs and films, sound and video recordings, received, requested or presented in order provided for by Article 122 of the Code.

The Criminal Procedure Code of Kyrgyzstan in Art. 5 of the Code of Criminal Procedure, the following definition is given: "explanation - oral or written argument of the participants in criminal procedure and the applicants, given in support of their claim or the claim of the represented person" [13].

In this regard Kyrgyzstan scientists note that the term "explanations" has a double meaning in criminal procedure: 1) explanation can be understood as the procedural form of receiving and recording data from all persons involved at the initial stage of the criminal investigation; 2) and, secondly, the explanation is a way of expressing the attitude of the suspect and other participants to circumstances of interest of investigators. Therefore, an explanation cannot be considered evidence, as the circumstance to be proved is not established "[14, 174].

In Art. 6 of the Code of Criminal Procedure of Armenia also contains paragraph 35, revealing the content of this definition: "explanation - oral or written argument of the participants in criminal procedure and the applicants, given in support of their claims or claims of the represented person, as well as oral or written communications of other persons given before the initiation of a criminal case". According the Criminal Procedure, the Code of Latvia information, communicated by a person called to provide it during interrogation, is a testimony or an explanation, which have the same meaning and are considered to be an evidence (part 1 of article 131) [15].

Such uncertainty in this definition usage by the legislator is unusial and affects law enforcement negatively. Therefore it demands to resolute ASAP. At the same time, we cannot agree with the position of disuse "explanation" in law, because it is suitable in many codes of criminal procedure [16, 11].

Without delving into the discussion on this issue, as it is not included in the subject of this research, we will try to formulate the starting points for solving the problem.

The starting point is the definition of "information." However there is no unity in its understanding in Criminal Procedure science today. Despite its widespread prevalence, this phenomenon remains one of the most controversial and may have different meanings in individual branches of human activity. There are many definitions of information, and Academician N.N. Moiseev even believed that, due to the breadth of this concept, there is no and cannot be a strict and sufficiently universal definition of information [17, 21].

Therefore, one should turn to the etymology of the word "information" (from lat. Informātiō) that means - "familiarization or clarification" [18]. It follows from this definition that information in its most general form can be obtained in two ways: through personal acquaintance with the phenomenon under study, as a rule, in this case we are talking about material sources of information. Acquaintance in this context means "to receive, collect data about something" and can be represented as the

following scheme: Subject - A Thing, in which the subject is a consumer of information ("reads" it) and the thing is its source.

In another way, information is obtained upon clarification, which, according to the dictionary of the Russian language, means "explain, make clear, clearer, understandable" [19]. Here, mainly verbal information is transmitted according to the scheme: Subject - Subject, and exchange of transmitted information is possible, which is excluded during familiarization, as the subject can not transmit anything.

In criminal procedure, scientists also take this approach as major. S.A. Schaefer notes that the role of the observation method is less significant when verbal information is obtained during such investigative actions as interrogation and confrontation. Observation, in his opinion, acts as the leading method of cognition when evidence is expressed in object-spatial or dynamic features of the object, e.g. during inspection, search, investigative experiment, etc. [20, 28]. As a result there are two methods - observation (familiarization) and the interrogation method (clarification).

Moreover, the term "explanations" itself is interpreted in dictionaries as explanations i.e. "Written or oral presentation in justification of something., Recognition of something. It clarifies, helps to understand something. So here is the explanation! (now it's clear what's the matter, what's the reason)" [21].

From the above it follows that one of the synonyms of the definition of "clarification" is explanations that characterize verbal information (verbalis - verbal, verbal) - this is verbal information transmitted using speech, text, writing [22].

3. RESULTS

The generally accepted forms of explanation (verbal informational statements) are:

1. *Statement of facts and events or statement of facts and events.* Depending on the nature of the information expressed, the statement can be a statement of facts (for example, Ivan has a height of 1 m 80 cm), a value estimation - a subjective opinion (Ivan is high), a generalizing statement - a conclusion (columns are usually high), etc.

The statement of facts is always based on the knowledge that the speaker possesses. Statements of fact are subject to verification - verification of compliance with reality. Correspondence of reality should not be confused with the truth of the statement. True or false statements can be recognized that form not only statements, but also assumptions, conclusions, etc.

2. *Opinion about the facts*. In comparison with a statement of facts, an opinion cannot or does not correspond to reality, as it reflects not reality, but its perception by a person, not the world, but someone's personal picture of the world, but it can be confirmed or not confirmed by facts or objective reality events. An opinion can be based on facts (that's why it differs from conjecture) and contain an assessment of the facts and their comments (that's why it differs from knowledge).

Opinion can be characterized as justified or unreasonable, as proven or unproven, but it is never characterized as corresponding or not corresponding to reality.

3. *Assessment of the facts.* The assessment may be characterized as fair or unfair, justified or not, but cannot be characterized as a whole as corresponding or not corresponding to reality.

Assessment is a modification of a statement of facts through the position of the knower and expressed in the form of an opinion. A statement of fact and an opinion on the fact (the statement passed through the assessment became an opinion) [23].

Thus, from the etymological analysis of the definition of information, it follows that its main verbal way of transmission is clarifications (explanations). The generally accepted forms of explanations (verbal informational statements) are: statement, opinion and assessment of facts.

The information is widely used in law, that's why explanations, as one of the main ways of transmitting, have been disseminated in its various branches (Arbitration Procedure Code of the Russian Federation, Civil Procedure Code of the Russian Federation, Code of Administrative Procedure of the Russian Federation, Federal Law "About Police", etc.). The universal nature of the explanations allows the disputing parties to effectively use them to defend their own legal interest, as well as to bring their position to competent officials. In this connection, the explanations are recognized by the legislator to be one of the types of evidence. Freedom to give explanations is a manifestation of a private principle in law, when participants in legal relations proactively express their position on all issues arising during the trial. The inclusion in the explanations, besides the factual information itself, as well as their assessment and opinion, allows the participant in any legal proceedings to fully realize his procedural interest.

"Among the various actions and judgments of the parties and third parties that are committed and expressed in the course of giving explanations in the case, only those in which the parties or third parties provide information on facts relevant to the establishment of disputed legal relations in the case should be considered as means of proof" [24, 173].

Testimony is also used in arbitration (art. 88), civil (art. 69) and administrative procedure, but only regards witnesses.

Besides the explanations, the arbitration procedural law secures the testimony (Article 88 of the Code of Arbitrational Procedure of the Russian Federation). In special literature it is noted that this is a rare means of proof. The law establishes that any person who knows information and circumstances relevant to the proper resolution of the dispute may be involved as a witness [25, 228].

To Professor M.K. Treushnikov's mind, in the explanations of the parties it is possible to distinguish: 1) messages, information about the facts, i.e. evidences; 2)

expression of will; 3) estimations on the legal qualifications of legal relations; 4) the motives, arguments by which each side covers the factual circumstances in a favorable aspect; 5) expression of emotions, moods [26, 159].

According to scientists' opinion, only part of the explanation can be considered as evidence in which the parties (other persons involved in the case) provide information on facts relevant to the establishment of disputed relations [27, 117]. Summary of arbitration judicial practice states such approach, according to which "it is not necessary to enter everything stated by the persons participating in the case during the court hearings in court record; the latter should be fully reflected only that which is essential for the case" [28].

Often, explanations are considered not to be according the Code of Arbitrational Procedure of the Russian Federation, for example, data that come from subjects that do not have the status of a "person participated in a case", including parties. As a result, such "strange" means of evidence may appear as "witnesses' explanations" [29]; or explanations turn into " clarifications" [30].

In many cases, on the basis of explanations, evidence can be established that eliminates the ambiguity arising from arithmetic inaccuracies or errors in filling out certain documents. Thus the explanations of the persons participating in the case, first of all, are the message to the court about the well-known the facts by persons, participating in the case. Due to the fact that explanations (testimonies) are given by those interested in the outcome of the case, it is unacceptable to ignore this information [31].

The procedural methods for the participants in the criminal procedure to express verbal information under the Code of Criminal Procedure of the Russian Federation are:

1. Testimony (Clause 2, Part 2, Article 42 of the Code of Criminal Procedure, Clause 5 of Part 4 of Article 44 of the Code of Criminal Procedure, Clause 2 of Part 4 of Article 46 of the Code of Criminal Procedure, Clause 3 of Part 4 of Article 47 of the Code of Criminal Procedure RF, Clause 3, Part 2, Article 54 of the Code of Criminal Procedure, Clause 1, Clause 4 of Article 56 of the Code of Criminal Procedure, Clause 1, 2, 2, 3, 1, Clause 2 of Article 74 of the Code of Criminal Procedure, Clause 1.2 of .2 Article 75 of the Code of Criminal Procedure, Articles 76-80 of the Code of Criminal Procedure of the Russian Federation, etc.).
2. Explanations (part 2 of article 18 of the Code of Criminal Procedure, paragraph 3 of part 4 of article 44 of the Code of Criminal Procedure, paragraph 2 of part 4 of article 46 of the Code of Criminal Procedure, paragraph 3 of part 2 of article 54 of the Code of Criminal Procedure, h .1 Article 144 of the Code of Criminal Procedure, part 9 of Article 193 of the Code of Criminal Procedure, etc.).
3. Petitions (part 2 of article 18 of the Code of Criminal Procedure, part 1 of article 25.1 of the Code of Criminal Procedure, paragraph 3 of part 2 of article 30 of the Code of Criminal Procedure, paragraph 5 of part 2 of article 42 of the Code of Criminal Procedure, paragraph 4 of .4 Article 44 of the Code of Criminal Procedure, clause 5 of part 4 of article 46 of the Code of Criminal Procedure of the Russian Federation, clause 5 of part 4 of article 47 of the Code of Criminal Procedure of the Russian Federation, etc.).
4. Complaints (part 2 of article 18 of the Code of Criminal Procedure, part 3 of article 29 of the Code of Criminal Procedure, p.18 part 2 of article 42 of the Code of Criminal Procedure, paragraph 17 of part 4 of article 44 of the Code of Criminal Procedure, paragraph 10 of .4 Article 46 of the Code of Criminal Procedure of the Russian Federation, clause 14 of part 4 of article 47 of the Code of Criminal Procedure of the Russian Federation, clause 10 of clause 1 of article 53 of the Code of Criminal Procedure of the Russian Federation, clause 12 of part 2 of article 54 of the Code of Criminal Procedure of the Russian Federation, etc.).
5. Challenges (Clause 9, Part 2, Article 37 of the Code of Criminal Procedure, Clause 5 of Part 1 of Article 39 of the Code of Criminal Procedure, Clause 5 of Part 2 of Article 42 of the Code of Criminal Procedure, Clause 4 of Part 4 of Article 44 of the Code of Criminal Procedure RF, Clause 5, Part 4, Article 46 of the Code of Criminal Procedure, Clause 5, Part 4, Article 47 of the Code of Criminal Procedure, Clause 8, Part 1 of Article 51 of the Code of Criminal Procedure, etc.).
6. Applications (part 3.1 of article 6.1 of the Code of Criminal Procedure, part 2 of article 18 of the Code of Criminal Procedure, part 4 of article 20 of the Code of Criminal Procedure, paragraph 5 part 1 of article 24 of the Code of Criminal Procedure, article 25 of the Code of Criminal Procedure, .3 part 3 of article 58 of the Code of Criminal Procedure, part 1 of article 3 of article 60 of the Code of Criminal Procedure, part 4 of article 147 of the Code of Criminal Procedure, part 4 of article 166 of the Code of Criminal Procedure, etc.).
7. Remarks (Part 2.3 of Article 260 of the Code of Criminal Procedure).
8. Demurrers (Part 3 of Article 243 of the Code of Criminal Procedure of the Russian Federation, Article 389.7 of the Code of Criminal Procedure of the Russian Federation, Clause 1 of Article 401.7 of the Code of Criminal Procedure of the Russian Federation).
9. Opinion (public prosecutor, commission examination experts, specialist).
10. Speechs.
11. Replicas (Article 337 of the Code of Criminal Procedure).

4. CONCLUSION

Thus, in the Russian criminal procedure, explanations are not widespread and used as the above-mentioned methods for expressing verbal information by participants in the criminal procedure. Moreover, the main ones among them are the testimonies of the suspect, accused, victim, witness, expert and specialist. This approach was formed back in the Soviet period, when the state authorities had

the goal of combating crime, that's why the share of publicity in criminal procedure was in top and the testimony replaced the explanation entirely. The participants in criminal procedure were only required to report all the information they knew about the case. However, their own interests were not taken into account.
This condition is not usial and contradicts the nature of the evidence, which is only part of the explanation. If in other Russian legal branches there was a differentiation between testimonies and explanations, the criminal process was the only branch to replace testimonies by explanations. It is methodologically incorrect.
As a result of the research, the author's approach to understanding the essence of the explanation of the participants in criminal procedure is proposed.
1. Certain information comes from any participant in criminal procedure, which receives the corresponding procedural fixation.
2. In the entire array of such information, apart from other forms, explanations stand out.
3. Explanation is a person's communication of other (auxiliary, additional) information on the procedure, order or for grounds, reasons for his actions (for example, consent to testify after clarification of the provisions of Article 51 of the Constitution of the Russian Federation; the defendant's answer to the question about the attitude to the accusation, asked at the beginning of the interrogation of the accused after the accusation; the message that the clarified rights and obligations are clear, etc.).
4. Unlike the testimonies, the explanations themselves are not evidence. The explanations are an integral part of the investigative action where they were given.
5. The procedure for obtaining explanations is free, does not require additional procedural guarantees and is under the regime of the procedural action in which they are communicated.
6. Explanations are not limited by investigative actions and may be given by a participant in the production of any procedural action, throughout the entire criminal procedure (for example, clarification by the head of the expert institution of the responsibility of the expert for giving a deliberately false conclusion, communication by the interrogated person of individual personal data).
7. Explanations, unlike testimonies, may be given by any participant in criminal proceedure, regardless of their procedural status and interest.
8. Purpose of explanations:
1) increasing the objective, transparency, and as a consequence the legitimacy of the criminal process itself, as a procedure, order.
2) a guarantee of compliance with the rights of all its participants.

REFERENCES

[1] Classics of Russian law. Retrieved from: http: //civil.consultant.ru/reprint/books/118/3.html#img4

[2] B.Ya. Gavrilov, Obtaining an explanation as an investigative action at the stage of initiating a criminal case, in: Interrogation: procedural and criminalistic problems (in memory of Professor N.I. Porubov): A collection of materials of 55 forensic readings, 2014, pp. 168-172.

[3] E.B. Grishina, The role of explanations in the evidence system at the stage of initiating a criminal case, Science and Practice 2(63) (2015) 36-38.

[4] R.D. Rakhunov, Confession of guilt by the accused, Moscow, 1975, p. 158.

[5] A.V. Pobedkin, The theory and methodology of using verbal information in criminal procedural evidence, doctoral dissertation, Moscow, 2005, p. 103.

[6] V.N. Roshchin, Accused at the preliminary investigation in the Soviet criminal trial, abstract of candidate dissertation, Moscow, 1955, p. 11.

[7] L.D. Kokorev, N.P. Kuznetsov, Criminal process: evidence and proof, Voronezh, 1973, p. 183.

[8] Ya.O. Motovilovker, Testimony and explanation of the accused as a means of defense in the Soviet criminal process, Moscow, 1956, p. 8.

[9] M.S. Strogovich, Criminal process, Moscow, 1946, p. 205.

[10] Kodeksy.com.ua; Retrieved from: https: //kodeksy.com.ua/ka/ugolovno_protsesualnij_kodeks_ukraini/statja-7.htm

[11] Code of Criminal Procedure of the Republic of Tajikistan. Retrieved from: http://www.adlia.tj/show_doc.fwx?rgn=15203&conttype=2

[12] Code of Criminal Procedure of the Republic of Kazakhstan. Retrieved from: https://online.zakon.kz/document/?doc_id=31575852#pos=2475;-18

[13] Code of Criminal Procedure of the Kyrgyz Republic. Retrieved from: http://cbd.minjust.gov.kg/act/view/ru-ru/111530

[14] Camille kyzy Guzel, About the essence of the testimony of the suspect, Science, new technologies and innovations of Kyrgyzstan 7 (2017) 174.

[15] Code of Criminal Procedure of the Republic of Armenia. Retrieved from: https://www.legislationline.org/download/id/4261/file/Armenia_CPC_am2006_en.pdf

[16] V.N. Roshchin, Accused at the preliminary investigation in the Soviet criminal trial, abstract of candidate dissertation, Moscow, 1955, p. 11.

[17] V. Khurgin, On the definition of the concept of “information,” Information Resources of Russia 3 (2007) 21.

[18] Wikipedia. Retrieved from: https://ru.wikipedia.org/wiki/%D0%98%D0%BD%D1%84%D0%BE%D1%80%D0%BC%D0%B0%D1%86%D0%B8 % D1% 8F # CITEREF% D0% A5% D1% 83% D1% 80% D0% B3% D0% B8% D0% BD2007

[19] Academician. Retrieved from: https://dic.academic.ru/dic.nsf/ogegova/200834

[20] S.A. Sheifer, Evidence and evidence in criminal matters: problems of theory and legal regulation, Norma, Moscow, 2008, p. 28.

[21] Academician. Retrieved from: https://dic.academic.ru/dic.nsf/efremova/235401/Explanation

[22] Academician. Retrieved from: https://dic.academic.ru/searchall.php? SWord = explanations & from = xx & to = ru & did = efremova & stype =

[23] Center for Expertise at the Institute of Forensic Science and Forensics. Retrieved from: https://ceur.ru/library/articles/lingvisticheskaja_jekspertiza/item351322/

[24] M.K. Treushnikova (ed.), Civil process: Textbook, Spark, Moscow, 1996, p. 173.

[25] N.M. Korshunov, The arbitration process: a textbook for university students enrolled in the specialty "Jurisprudence", 3rd ed., UNITY-DANA: Law and Justice, Moscow, 2015, p. 228.

[26] M.K. Treushnikov, Judicial evidence, Moscow, 2004, p. 159.

[27] M.A. Gurvich, Lectures on the Soviet civil process, Moscow, 1950, p. 117.

[28] A summary of some aspects of the application of the procedural rules of the Arbitration Procedure Code of the Russian Federation in the conduct of the trial record. Retrieved from: http://www. astrakhan.arbitr.ru

[29] Resolution of the Federal Antimonopoly Service of the Ural District of September 28, 2006. No. Ф09-7451/06-C4. Retrieved from: Reference legal system “Guarantor”.

[30] Decision of the FAS MO of 04.07.2006. No. KA-A40/5871-06-P. Retrieved from: Reference legal system "Guarantor".

[31] D.R. Kripakova, Explanations of the case in the mechanism of arbitration procedural evidence (theoretical and legal aspects), Bulletin of the Voronezh State University, Series: Linguistics and Intercultural Communication 3 (2008) 318.