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Introduction: What is the Role of Coherence in Criminal Justice?

The Characterization of Coherence in Law

In modern society, the ever-increasing role of law as a basis for designing, adopting, expressing, and implementing social policy decisions and evaluating their consequences often overshadows the role of other social regulators. Thus, it is no coincidence that the legal system is one of the most important centers of social life in modern society. The legal system represents the totality of the legal reality – a phenomenon that embodies legal consciousness or ideology, legal psychology, objective law and the legal practice of any social group. In other words, the legal system is a concept that defines the characteristics of the legal reality of any social group – i.e., the totality of legal phenomena. This concept has both a broad and narrow interpretation. In the narrow sense, the legal system usually encompasses the system of law and legislation. In the broad sense, the legal system is not identical to the law system, as the content of the legal system may comprise more elements than law and legislation. The latter two elements are the normative basis of the legal system, acting as its central connecting link, on the basis of which the legal system encompasses legal theory, legal consciousness, and legal policy, i.e., theoretical elements and those that relate to worldview as well as legal practice (Šlapkauskas 2006, pp.21–22).

As mentioned above, from a functional perspective, law is considered a regulatory instrument for social affairs, and each country faces similar, if not identical, law problems. Various legal systems lead to the same system of functional complexes when applied in practice, despite their differences in historical development, theoretical and systemic structure, and style. The main functional subsystems of a legal system are legislation, jurisdiction, and jurisprudence (Galginaitis 2002, p.39).

The modern legal system and its functional subsystems are inextricable from coherence. A coherent legal system, presupposed by the principle of the rule of law, is one in which components are logically concerted and work together in harmony. Coherence emphasizes the need for a unified and integrated approach to the interpretation and application of the law to ensure the predictability and stability of legal outcomes. Overall, coherence is essential to maintaining a legal system that is fair to all stakeholders and fosters public confidence in its effectiveness.

For example, according to the doctrine of the Constitutional Court of the Republic of Lithuania (hereinafter – the Constitutional Court), the constitutional principle of the rule of law encompasses a large number of different interlinked imperatives. The content of this principle is revealed with respect to the various provisions of the Constitution of the Republic of Lithuania (hereinafter – the Constitution) by assessing the totality of the values enshrined therein and which are protected and defended under the Constitution (Resolution of the Constitutional Court of 13 December 2004). The constitutional principle of the rule of law must guide both the legislative and executive processes (Rulings of the Constitutional Court of 6 December 2000, 13 December 2004, 16 January 2006, 13 August 2007). The Constitutional Court has reiterated that the constitutional principle of the rule of law is inseparable from the principle of justice, and vice versa: the protection of legitimate expectations, legal certainty, and legal security are equally inseparable elements of the principle of the rule of law (Resolution of the Constitutional Court of 3 February 2010), as is the constitutional principle of proportionality (Rulings of the Constitutional Court of 29 December 2004, 29 September 2005, 10 April 2009). The Constitutional Court has also stated that public authorities must comply with the principle of the rule of law enshrined in the Constitution when drafting and adopting legal acts (Resolution of the Constitutional Court of 26 February 2010). Further, the Constitutional Court has established that an essential element of the principle of the rule of law enshrined in the Constitution is legal clarity, which implies certain mandatory requirements for legal regulation: it must be clear and coherent, and legal norms must be formulated precisely and not contain any ambiguities (Rulings of the Constitutional Court of 30 May 2003, 26 January 2004, 24 December 2008, 22 June 2009).

The particular significance of coherence has been emphasized in legal theory. Scholars have sought to demonstrate the importance of coherence as an ideal characteristic of law and a criterion for legal reasoning (Bertea 2005, pp.369–370). In the 20th century, some authors focused on what makes law coherent, while others debated whether law is coherent and, if so, why it should be thus (e.g., Levenbook 1984; Alexy and Peczenik 1990, as cited in Bertea 2005, p.370). For example, Dworkin (1986) described law as an integral system and its structure as an all-encompassing legal empire. Certainly, this structure is conflicting, as contradictions are bound to arise between different legal values expressed as principles. According to Dworkin, when deciding cases, judges do not possess the discretion to make law; instead, law ought only to be identified, discerned, and have its principles revealed (Dworkin 2005, pp.188–190). It should be noted that Dworkin made notions of law dependent on morality: law delegates to the

court the power to implement its own notions of political morality (Dworkin 2004, p.200). On the other hand, different authors have treated the role of coherence in law in a different light. For example, Raz (1994) supported a rather critical view of the requirement for coherence in law. In 21st century legal scholarship, some iterations of a coherent law theory are already in development, such as "integrated coherentism," which postulates that law is "broadly coherent" (Hage 2004, p.101).

Without delving into a comprehensive analysis of the concept of coherence in legal literature, it may be noted that

> Coherence is generally held to be something more than logical consistency of proposition. But it is not clear exactly what this "something more" amounts to. Thus, coherence is often defined in figurative language as the equivalent of "hanging together," "making sense as a whole," "cohesion," "consonance," and "speaking with one voice." A coherent set might therefore be described as a "tightly knit unit." Which makes coherence a "kind of internal interconnectedness," a "plausible connection" that is not linear and asymmetrical, but circular and symmetrical: the elements of a coherent structure are mutually supporting and reinforcing. Coherence is argued on this basis to be a form of supportive rationality (Bertea 2005, pp.371–372).

These definitions allow for further internal distinctions to be made between types of coherence. "An important distinction is that between epistemic and constitutive coherence. Epistemic coherence is a condition of justified beliefs; constitutive coherence is a criterion of either correctness or truth" (Bertea 2005, p.372). Therefore, coherence in the context of "drawing inferences of fact from evidentiary facts" is referred to as "narrative"; when applied to matters of law, it is regarded as "normative coherence." The latter term may also be applied "to a normative system or to reasoning with norms" (Bertea 2005, p.372). Based on an approach involving a normative system, coherence is considered to be an ideal characteristic of any given legal system, i.e., it is recognised as a systemic category: "a legal system is coherent if its components fit together, either all of them (global systemic coherence) or a sub-part (in which case we have local systemic coherence)" (Bertea 2005, p.372). Normative coherence may also be applied in the assessment of legal arguments presented in support of specific decisions, i.e., whether each argument is consistent with the others, or whether a specific legal decision is in line with the fundamental principles of a given legal system (Bertea 2005, p.372).

Conversely, a more moderate view proposes that correct legal decisions are based on criteria other than coherence. To seek coherence means to accept the plurality of both evaluation/motivation criteria and the elements that make up the legal system without denying the multifaceted nature of coherence. Coherence,

therefore, does not imply a commitment to ignore the complexity of the legal system and uphold an unrealistic ideal of the legal order (Bertea 2005, p.373).

In summary, while coherence is perceived as a minimum requirement for rationality, it is not itself superior to other values. For example, a sentencing system may appear coherent and harmonized, but in practice, sentences may be three times or one-third higher than they should be. Nonetheless, the prevailing belief is that any area of law should strive for coherence to avoid arbitrariness and injustice. As a minimum, the most obvious inconsistencies, errors, or discrepancies ought to be addressed despite the trouble or even impossibility of reaching a consensus as to what complete coherence actually means (Sunstein *et al.* 2002, p.1203). It is therefore no coincidence that the title of this monograph includes the words "towards coherence."

Coherence Between National, International, and EU Law

Globalization has had a profound effect on all areas of modern life, including law. In a globalized world, legal issues are increasingly becoming common to everyone. International transactions, business relations, and technological development, among other factors, are driving international, European Union (EU), and national legal systems to seek ways in which to align legal rules, institutions, and organizations with the implementation of the law and other components of the legal system to effectively address multinational issues.

The approximation of national law, international law and EU law is a key issue, especially for EU Member States. Member States have their own laws and legal systems, which reflect differences in national legal traditions. These differences can lead to certain challenges, including that of primacy – i.e., whether, in certain cases, EU law, international law or national law takes precedence. The coherence/harmonization process is meant to aid in such instances, as its purpose is to define a resolution mechanism for discordant legal systems and ensure their harmonized application.

The scientific literature has identified and continues to explore the various directions of the influence exerted by international and EU law: their impact on national legal systems (e.g., Bobek 2020; Brink 2017); their interaction (e.g., Hildebrandt 2020; Callewaert 2009); and the relationship between the case law of the European Court of Human Rights (hereinafter – ECtHR) and the Court of Justice of the European Union (hereinafter – CJEU) in the interpretation of the European Convention on Human Rights (hereinafter – ECHR) and EU laws, respectively (e.g., Kargopoulos 2015, as cited in Jočienė 2022, p.91). The issue of coherence in purely international or EU law has been raised further in scholarly

discourse, accentuating the need for consistency across these legal systems, given that the "judicial category" is particularly dependent on an explicit and implicit legislative process (e.g., Trachtman 2011; Duic 2015).

The principle of constitutional supremacy is often explicitly enshrined in national constitutions, but provisions on the standing of international and EU law with regard to national legal systems are also included (Jočienė 2022, p.91). For example, in the constitutional law of the Republic of Lithuania, the principles of general law and *pacta sunt servanda* imply the commitment to fulfill in good faith the obligations of the Republic of Lithuania under international law alongside respect for international law, which is an integral part of the constitutional principle of the rule of law (Miliuvienė 2020, p.152). The Constitutional Court has ruled that minimum standards for the protection of human rights and freedoms in relation to national protection have been established by international legal norms and principles, and that, therefore, Lithuanian state institutions may not impose on the local population standards that are fundamentally different from those provided for by the norms of international law (Miliuvienė 2020, p.152).

The constitutional acceptance of international and EU law is also expressed by the geopolitical orientation of the Republic of Lithuania, which is rooted in the country's fundamental constitutional values – independence, democracy, and the country's status as a republic – and which implies the Republic of Lithuania's membership of the EU and NATO and the necessity of fulfilling the relevant international obligations that arise from these memberships (Miliuvienė 2020, p.153).

EU law has further constitutional "safeguards": the Constitutional Act "On Membership of the Republic of Lithuania in the European Union" is an integral part of the Constitution; therefore, Lithuania's membership in the EU is a constitutional value. This act *expressis verbis* provides a solution/rule regarding the question of applicable law: "The norms of European Union law shall be a constituent part of the legal system of the Republic of Lithuania. Where it concerns the founding Treaties of the European Union, the norms of European Union law shall be applied directly, while in the event of the collision of legal norms, they shall have supremacy over the laws and other legal acts of the Republic of Lithuania" (The Constitutional Act "On Membership of the Republic of Lithuania in the European Union" 2004).

Constitutional courts are mandated to ensure coherence between national constitutional provisions and international and EU law, and to adapt international and EU law to the national system. In other words, they must seek reconciliation between the two elements that comprise the rule of law: the supremacy

of the national Constitution and respect for international and EU law. "While ensuring the supremacy of the Constitution, the Constitutional Court must find ways to bring it into accordance with another aspect of the rule of law – respect for international (and EU) law, and in fulfilling such an obligation, the Constitutional Court may apply all necessary measures – from harmonising interpretation, to pointing out the obligation to amend the Constitution or eliminating amendments to the Constitution that contradict international or EU law" (Žalimas 2018, p.67)

As further noted in the legal literature, the relationship between national constitutional law and international and EU legal systems is defined by the realist (coordination) theory, which does not recognize the primacy of any one of these legal systems. A key principle of this theory lies in "mutual comity," according to which constitutional courts interpret their national law in a manner that ensures maximum alignment with the provisions of international or EU law, while the pertinent international and EU courts interpret laws under their jurisdiction while remaining mindful of national constitutional jurisprudence. Therefore, hypothetical clashes between different legal systems and the jurisprudence of their representative courts are exceedingly rare, as both sides make a conscious effort to avoid them. The success of this theory is strongly contingent on the coordination and harmonization of international, EU, and national legal systems. The establishment of a global and universal legal order that comprises national, international, and EU legal systems operating on an equal footing rests on the acceptance of constitutional pluralism (Miliuviene 2020, pp.158–159).

Challenges to the Coherence of Criminal Law in the EU

The term *criminal justice system* "[…] describes the formal governmental institutions that aim to regulate human behavior and human morality in order to achieve social control through criminal legislation, law enforcement, courts, corrections, pardons and parole, and rehabilitation and treatment programs – as well as by understanding, predicting, and managing the occurrence of crime" (Friedman 2015, Abstract). Similar to other judicial systems, the criminal justice system currently faces challenges arising from, among other things, internationalization, digitization, and European integration.

This is particularly evident in the EU, where national substantive and procedural criminal law is covered by EU legislation to a significant extent. The dynamic interaction between EU law and criminal law (which broadly encompasses substantive, procedural, and sentencing law) is shaping and redefining their very foundations, principles, and concepts. This is done in pursuit of

effective crime control and due process at the national, EU, and international levels, as well as to implement EU policies and to maintain the EU's standing as a global player in the fields of security and criminal justice.

> The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities (Consolidated version of the Treaty on European Union, Article 2). These values are central to the functioning of the EU; upholding them is a prerequisite for accession, and they must not be infringed on afterwards (Mancano 2021, p.477).

In a sense, the EU values are the blood vessels, with EU and national law acting as the blood of the Union legal order: when the mechanisms to ensure that the values are respected throughout the EU fail, it is the whole legal organism that suffers the consequences (Mancano 2021, pp.477–478).

Based on these values, the EU aims to foster and develop an area of freedom, security, and justice, where fundamental rights and the different legal systems and traditions of the Member States are respected (Consolidated version of the Treaty on the Functioning of the European Union, Article 67). The EU respects the national identities of the Member States, which are inseparable from their fundamental political and constitutional structures (Consolidated version of the Treaty on European Union, 2020, Article 4, paragraph 2). The preamble of the Charter of Fundamental Rights of the European Union (2016); hereinafter – the EU Charter) also recognizes that the EU respects, among other things, the diversity of the traditions of the peoples of Europe. Traditionally, criminal law has been ascribed to national competence and therefore subject to "intergovernmental" governance at the EU and international level (Öberg 2021, p.409). Some criminal law issues, such as criminalization, sanctioning, procedural models, etc., often echo national traditions which vary considerably across Member States and are not immune to the effects of societal change. However, EU criminal policy employs a range of legal instruments that impact national criminal justice systems to a variable scope and degree. "In that regard, although it is true that the authors of the Treaties have ascribed only limited powers to the Union in criminal matters, it is nonetheless apparent from the case-law of the Court that EU law sets certain limits to the powers of Member States in such matters […]. Indeed, that power of the Member States must be exercised in line with not only the fundamental freedoms guaranteed by EU law […], but also EU law as a whole, in particular primary EU law" (*Ilmārs Rimšēvičs and European Central Bank v. Republic of Latvia* [GC] 2019, paragraph 57). As regards criminal matters, Member States must fulfill their obligations under EU law.

Firstly, both the improvement of the mutual recognition of convictions and other judicial decisions, and targeted legislative harmonization are necessary to facilitate cooperation between competent authorities in the field of criminal justice and to ensure the protection of individual rights. In accordance with Article 82 of the Treaty on the Functioning of the European Union (hereinafter – TFEU), "judicial cooperation in criminal matters in the Union shall be based on the principle of mutual recognition of judgments and judicial decisions and shall include the approximation of the laws and regulations of the Member States in the areas referred to in paragraph 2 and in Article 83." The principle of mutual recognition assumes that Member States trust their respective criminal justice systems. The CJEU has also ruled that the principle of mutual recognition is based on the mutual confidence of Member States in the ability of their respective national legal systems to ensure the equivalent and effective protection of fundamental rights recognized at the EU level. The principle of mutual trust requires each Member State to presume that, barring exceptional circumstances, all other Member States comply with EU law and, in particular, uphold the fundamental rights enshrined therein, and limitations on the principles of mutual recognition and trust between Member States may only be imposed in exceptional circumstances (*Pál Aranyosi and Robert Căldăraru v. Generalstaatsanwaltschaft Bremen* [GC] 2016, paragraphs 76–78, 82).

The extent to which the principle of mutual recognition is implemented hinges on a number of factors, including, among other things, the existence of harmonized mechanisms for the protection of the parties to criminal proceedings and standards for the admissibility of mutual evidence. Pursuant to Article 82(2) of the TFEU, directives may establish minimum rules to facilitate the mutual recognition of convictions and judgments and cooperation between the police and judicial authorities in cross-border criminal matters. The minimum rules apply to the areas laid down in Article 82(2) (a)–(d), and they have received considerable attention in the EU legislative agenda. The following areas are worthy of separate mention: common minimum standards for criminal proceedings; the fight against terrorism; the fight against corruption, cybercrime, fraud, and money laundering; the exchange of information between Member States and EU agencies; the protection of victims; and both agencies for judicial cooperation in criminal matters and other related bodies, such as the European Union Agency for Criminal Justice Cooperation (Eurojust) and the European Public Prosecutor's Office (Judicial Cooperation in Criminal Matters 2023; also, see Ouwerkerk 2019). It should be noted that although the competence of the EU

is functional under Article 82(2) of the TFEU, the harmonization of the rights of defense applies not only to cross-border cases, but also to those of a domestic nature.

> Although the Treaty limits EU power to minimum harmonisation, the CJEU has already confirmed that the effectiveness of EU law applies fully to EU measures on defence rights, including the securing the effective exercise of rights on the ground. Although it has been argued that EU secondary law would be superfluous in this field, as the rights are already enshrined in the ECHR and the Charter, the adoption of secondary harmonising EU law has had the effect of amplifying these rights, and triggering the reach of a variety of enforcement mechanisms under EU law. The approach of the CJEU thus far has demonstrated that the interaction between EU secondary law and ECHR and Charter norms has not been problematic. With the CJEU relying on the ECHR to determine the content of specific Directive provisions when there is already Strasbourg case-law, reverting to general principles of EU law when called to balance the effectiveness of enforcement with the effectiveness of fundamental rights protection more broadly (Mitsilegas 2019b, p.141).

Second, the EU's competence in the area of substantive criminal law includes the establishment of minimum rules for offenses and sanctions in the areas of particularly serious crimes with a cross-border dimension, such as terrorism, trafficking in human beings and the sexual exploitation of women and children, illicit drug trafficking, illicit arms trafficking, money laundering, corruption, counterfeiting means of payment, computer crime, and organized crime (Article 83(1) of the TFEU). Furthermore, the CJEU has ruled that although in principle criminal law and criminal procedure rules fall outside EU competence, the EU legislator is not precluded from taking measures with regard to the criminal laws of Member States in situations where competent national authorities must impose effective, proportionate and dissuasive criminal sanctions in order to guarantee the effective implementation of an EU policy. This competence is expressly provided for in Article 83(2) of the TFEU (Opinion of Advocate General Pitruzzella, delivered on 27 April 2023, paragraph 32).

Despite considerable progress having been made in the functioning of the EU within the scope of Articles 82 and 83 of the TFEU, a number of challenging issues remain concerning the approximation of legislation and its subsequent interpretation, application and so on. For example, the scope of the EU's "functional criminalization" competence under Article 83(2) of the TFEU is considered ambiguous; the multi-layered system of the European Public Prosecutor's Office is considered to lack legal certainty (Mitsilegas 2019a, pp. 393, 394–395); and the legal justification for the formulation of EU criminal policy is viewed critically (Öberg 2021).

Research Object

Toward Coherence in Criminal Justice: Challenges, Discussions, and/or Solutions is a comprehensive study of coherence in various aspects of criminal justice. The research focuses on coherence as a principle that enhances the effectiveness of criminal justice and its individual components.

It critically examines practical issues of coherence in various areas of criminal justice. The monograph analyzes existing research, legal frameworks, case law, and empirical evidence to identify the level of coherence in various areas of criminal justice. It also examines whether a degree of coherence is compatible with the objectives of justice and public safety, as well as possible tensions or trade-offs between coherence and other values, such as flexibility and responsiveness to a changing social environment.

In summary, this monograph aims to examine the coherence of legal regulation and the application of individual elements of criminal justice. The authors of the monograph aim to contribute to scientific progress in the field of criminal justice and to the improvement of its policy and practice by presenting the most important theoretical and practical views on the coherence of individual areas of criminal justice, identifying existing problems, potential challenges, and proposing solutions.

Research Aim and Objectives

The aim of this study is to identify the main challenges or problems and to offer possible solutions, or at least to initiate a scholarly debate on how to achieve greater coherence in the various areas of criminal justice.

Research objectives:

1. An examination of the coherence of legal regulations and their interpretation, application, and practical implementation in the following areas of substantive criminal law:
   (a) criminalization or decriminalization, the legal framework and its interpretation, and practice within individual offenses (e.g., human trafficking, drug possession, offenses against justice, and unlawful stalking);
   (b) compatibility between the application of administrative and criminal liability; and
   (c) the uniform application of criminal jurisdiction principles to offenses committed abroad by Member State nationals and residents.

2. An examination of the coherence of legal regulations and their interpretation, application, and practical implementation in the following areas of criminal procedural law:
   (a) the movement of electronic evidence between EU Member States and the assessment of its reliability;
   (b) the standard of proof in a confiscation procedure not predicated on a conviction and its compatibility with human rights, particularly the presumption of innocence; and
   (c) subjective threats to the free evaluation of evidence;
   (d) separate issues relating to the right to a fair criminal trial – whether written procedures are an absolute limitation on the right to an oral hearing before an appellate court, and the limits of the integration of technology into criminal procedure.

Research Methodology

This monograph has been prepared in response to the *Rule of Law, Sustainability, Technologies* 2022–2026 research program approved by Mykolas Romeris University in 2021. The program includes a fourth research axis: *Research for more effective justice*. Improving the criminal justice system is crucial to achieving more effective justice. This can be achieved through measures such as criminalizing or decriminalizing offenses, exploring new methods of investigating or assessing evidence, and finding solutions to the challenges posed by remote criminal proceedings, etc.

The relationship between the coherence and effectiveness of the criminal justice system and its components is complementary. A coherent criminal justice system ensures that all its components work smoothly together, avoiding contradictions or incompatibilities that could hamper its effectiveness. When legislation is coherent, and its application and implementation are consistent, this can increase the efficiency of the system by streamlining processes, reducing delays and maximizing resources.

This monograph is the result of a collaborative effort among researchers to improve the coherence of criminal justice. Criminal justice scholars were invited to participate in the study and answer the following questions: Why is legal coherence relevant to your proposed criminal justice research? How might your research be developed through the prism of legal coherence? What developments in legal coherence have influenced the development of your proposed

criminal justice research? What are the main barriers to legal coherence in your field, and how can they be overcome?

Limitations

This edited volume has a limited geographical scope, covering mainly Lithuanian and European legal perspectives. Some parts of the monograph deal with Lithuanian issues in a European context, in some cases using non-European examples. Other parts focus solely on the Lithuanian aspect, while some parts go beyond Lithuania to include examples from Latvia, for example. The authors' coverage of a wide range of topics is crucial for presenting specific issues of legal coherence in Lithuania and highlighting problems and challenges both within and outside the region.

The Structure of the Book

The structure of this monograph is divided into two parts. The first part, *The Search for Coherence in Substantive Criminal Law*, addresses several key issues. These include criminalization or decriminalization, the legal framework and its interpretation, and practice within the areas of individual offenses (human trafficking, drug possession, offenses against justice, and unlawful stalking). It also examines the compatibility of administrative and criminal liability and the consistent application of criminal jurisdiction principles to offenses committed abroad by nationals and residents of a Member State.

The second part of the monograph, *The transformation of Criminal Procedure Law in the Context of Coherence*, focuses on several issues, including: the movement of electronic evidence between EU Member States; the concept of electronic evidence and the assessment of its reliability; subjective threats to the free assessment of evidence; and the standard of proof in a confiscation procedure not predicated on a conviction and its compatibility with human rights, particularly the presumption of innocence. It also addresses specific issues related to the right to a fair criminal trial, such as whether the written procedure of a case constitutes an absolute restriction on the right to an oral hearing before an appellate court and the limits of the integration of technology into criminal procedure.

The edited volume also contains conclusions and a summary.

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Jolanta Zajančkauskienė /
Rima Ažubalytė / Oleg Fedosiuk (eds.)

Towards Coherence In Criminal Justice

Challenges, Discussions And/Or Solutions

PETER LANG

This book explores the pursuit of coherence in criminal justice, addressing how criminal laws and practices can become more rational and aligned with human rights principles. It examines key criminal justice principles like legality, proportionality, and presumption of innocence, aiming to adapt them to modern societal and technological challenges. The work highlights the growing influence of international conventions and European courts on national legal systems, emphasizing the need for thoughtful implementation of transnational precedents. While focused on Lithuanian criminal justice, topics like human trafficking, drug possession, and electronic evidence are relevant across Europe, offering insights for legal researchers globally.

Jolanta Zajančkauskienė is a researcher with 25+ years of experience and has published 30+ articles. She leads the Institute of Criminal Law and Procedure and the master's program in Criminal Law and Criminology at Mykolas Romeris University.

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